

Kizildere III GPP Capacity Extension Project

Stakeholder Engagement Plan

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Quality information

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1. Introduction

Kizildere III is a geothermal power project with a 100 MW capacity developed by Zorlu Enerji. It employs highefficiency triple flash combined-cycle geothermal power plant. The plant integrates two systems: flash steam generation system that uses steam under high pressure; plus binary cycle power generation system that uses flash turbine exhaust steam to vaporize a working fluid with a lower boiling point and use it to drive a turbine. The planned Project is capacity extension of the power generation capacity from 100 MW to 165 MW. Hence, the Project includes acquisition of additional land for fourteen production wells, 8 reinjection wells and 1 observation well, pipelines, service roads and power plant.

This document presents the Stakeholder Engagement Plan (SEP) developed for guiding Zorlu Enerji toward implementing a structured stakeholder consultation and engagement process for the Project. The SEP outlines a systematic approach to stakeholder engagement that will help Zorlu Enerji develop and maintain over time a constructive relationship with its stakeholders throughout the Project life time. The SEP is comprised of analysis of stakeholders, proposed engagement activities, disclosure plan and grievance mechanism for stakeholders to raise their concerns about the Project.

The SEP has been produced in accordance with the international standards required by the European Bank for Reconstruction and Development (EBRD).

The SEP is a living document and it will be regularly monitored, reviewed and updated by Zorlu Enerji throughout all stages of Project implementation.

2. **Project Information**

2.1 Project Location

The Project is located in Gökgedik area of Buharkent District of Aydın Province, Turkey. The area covered by the Project is 84,700 m². Figure 1 shows the geographic location of the Project site.

2.2 Need for the Project

10th Development Plan (2014-2018) of Turkey indicates that electricity energy demand was 174,637 GWh in 2006 and increased to 255,000 GWh and it is expected to be around 341,000 GWh in 2018. The pace of electricity generation cannot keep up with that for consumption; hence electricity generation capacity is required to be increased in order to meet the increasing demands. In this respect, the Project will contribute to the electricity generation capacity of the country and respond well to the National Energy Strategy (2015-2019) that calls for concentrating on domestic resources for meeting the increasing energy demands through use of resource diversity and renewable energy.

According to data of General Directorate of Renewable Energy, Turkey ranks the 5th in the world and 1st in Europe based on its use of geothermal potential. As for electricity generation from geothermal resources, Turkey is in the 12nd rank in the world in terms of electrical energy production from geothermal resources with 490 GWh/year. Despite the high geothermal potential, geothermal energy is not adequately considered as important and is used only at a rate of 3% of the overall potential. Geothermal energy is a renewable, sustainable, cheap, safe, environmentally-friendly, domestic and green energy type.

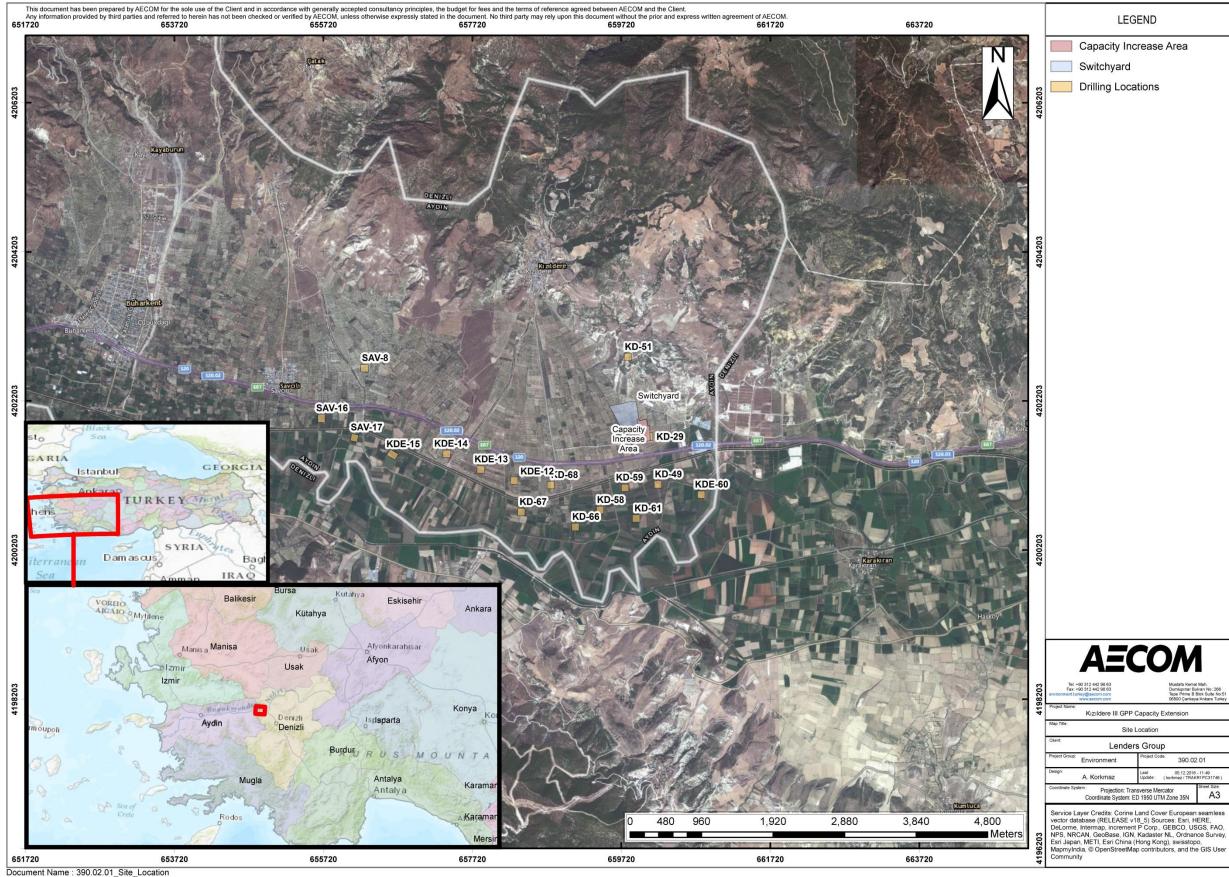


Figure 1. Project Location

| _ | | |
|---|----|---|
| | IN | υ |
| | | |

| Capacity Extension | |
|---|-------------------|
| s Group | |
| Project Code: 390.02 | 01 |
| Last 05.12.2016 Update: (korkmaz / TRAK | |
| nsverse Mercator D 1950 UTM Zone 35N | Sheet Size: A3 |
| Land Cover European 18_5) Sources: Esri, H | |

2.3 Summary of Environmental and Social Impacts of the Project

Despite that it is a green energy source, the Project may pose certain adverse impacts on the environment and communities in its impact zone throughout the construction and operation phases.

Potential socio-economic impacts of the project are land-acquisition, labour issues, occupational health and safety, temporary nuisance from noise and dust generation, community safety, etc and while some other cumulative impacts may be anticipated affect i.e. impacts on local livelihoods such as agricultural production in the long run. As for potential environmental impacts; soil and groundwater contamination from storage and use of chemicals, hazardous materials and various types of wastes; wastewater generation from site personnel, emissions from the cooling tower, etc.

2.4 Purpose of this Stakeholder Engagement Plan

The main goal of this SEP is to ensure that project-affected people and other stakeholders are provided relevant, timely and accessible information so that they have an opportunity to express their views and concerns about the Project and its impacts. Stakeholder engagement process helps to:

- identify and involve all potentially affected stakeholders,
- generate a good understanding of the Project among those that will be affected,
- identify issues early in the project cycle that may pose risks to the Project or its stakeholders,
- ensure that mitigation measures are appropriate (implementable, effective and efficient),
- establish a system for long-term communication between the Project and communities that is of benefit to all parties.

The SEP also aims to:

- define a consultation approach for stakeholders in relation to construction and operation of the Project,
- identify resources and responsibilities for implementation and monitoring of the consultation program,
- set up a grievance mechanism for the stakeholders, including a process to address views and concerns.

The ultimate purpose of this SEP is to establish and maintain constructive relationships with the local community and other interested stakeholders that are essential for the successful management of the Project's environmental and social impacts. Zorlu Energi is fully committed to undertaking necessary engagement activities related to the Project in a manner that is consistent with international good practice as outlined in next sections.

2.5 Structure of the SEP

Contents of this SEP include the following:

- Project description and key environmental and social issues
- Identification of stakeholders and other affected parties
- Overview of previous stakeholder engagement activities
- Stakeholder engagement programme and methods of engagement
- Grievance mechanism
- Reporting

3. **Regulatory Requirements**

3.1 National Requirements

According to the EIA Regulation of 2014 of MoEU, an EIA Report is compulsory for geothermal power plants with capacity above 25 MW. Article 9 of the EIA Regulation requires that a public participation meeting is held for disclosing the project to local stakeholders and for creating the means for communities to express their opinions and ask questions related with the Project's possible impacts and corresponding measures.

3.2 EBRD Requirements

Performance Requirement (PR) 10 of EBRD recognizes the importance of an open and transparent engagement between the client, its workers, local communities directly affected by the project and, where appropriate, other stakeholders as an essential element of good international practice (GIP) and corporate citizenship. Such engagement is also a way of improving the environmental and social sustainability of projects. In particular, effective community engagement, appropriate to the nature and scale of the project, promotes sound and sustainable environmental and social performance, and can lead to improved financial, social and environmental outcomes, together with enhanced community benefits. Stakeholder engagement is central to building strong, constructive and responsive relationships which are essential for the successful management of a project's environmental and social impacts and issues.

This PR identifies GIP relating to ongoing stakeholder engagement as an ongoing process which involves public disclosure of appropriate information; meaningful consultation with stakeholders; and an effective procedure or mechanism by which people can make comments or raise grievances.

This PR applies to all projects that are likely to have adverse environmental and social impacts and issues on the environment, workers or the local communities directly affected by the project. The clients are expected to identify and engage with stakeholders as an integral part of their overall environmental and social management system (ESMS) and (ESMP) as outlined in PR 1.

4. **Previous Stakeholder Engagement Activities**

4.1 Previous Stakeholder Engagement Activities

A "Public Participation Meeting" was organized on 19th July 2016 in a community center in Kizildere village, within the scope of EIA preparation process. About 40 people among the local community participated in the meeting together with participants from local authorities. Zorlu Enerji and the EIA Consultant presented the Project and potential environmental and social impacts and mitigations to the participants. Selection of the Project site and project context was explained in detail during the meeting. Questions from community members comprised mainly of concerns on potential impacts of the Project on agricultural production and on regional flora and fauna. Local people were also concerned about the effluent discharge from drilling works and how the effluent will be managed. Zorlu Enerji answered all questions in detail.



Figure 2. EIA Public Participation Meeting

A group of 17 locals who attended the EIA consultation meeting signed a petition against the project, entitled "We are against geothermal power" which was appended to the minutes of the meeting submitted to the MoEU as part of the EIA.

It is observed that local people have experienced negative impressions from other geothermal projects in the region, particularly because of discharge of geothermal effluent directly on soil and into creeks.

During the meeting, local people raised concerns with regards to the potential cumulative impacts of geothermal projects such as climate change, disturbed moisture balance in the atmosphere, impacts on agricultural production in the Menderes basin. They believe that olive and fig trees have already been disturbed by other geothermal power activities in Aydin province due to radon emissions from geothermal wells which are carcinogenic. They also relate increased mortality rates with the geothermal power production in the region.

The concerns of the local stakeholders indicated that there is an urgent need for further analysis and management of cumulative impacts of geothermal projects in the region. It is also understood that there is a need for a clear and transparent information sharing with the local stakeholders on a regular basis to avoid misinterpretations with regards to the impacts of geothermal energy on their lives.

Therefore, Zorlu Enerji will liaise with all relevant stakeholders including universities, Associations and local authorities in order to increase awareness and knowledge on the impacts and mitigations of geothermal projects.

4.2 Ongoing Stakeholder Engagement Activities with Local Stakeholders

Zorlu Enerji has established an effective relationship and dialogue with local communities by means of organizing thematic meetings. A meeting on "Geothermal Energy" was organized in Sarayköy with the participation of local people from 10 villages in the region, by early 2014. Another thematic meeting was organized on "Geothermal Energy and its Applications" for 30 staff of Provincial Directorate of Environment and Urbanization in April 2015. The site social specialists typically conducted 2-3 times per week village visits and meetings as part of regular engagement activities in 2016. Additionally, once a month visits are conducted by the environmental and social specialist based in the Zorlu Enerji head office.



Figure 3. Regular Village Visits by Zorlu Enerji Team (Saraykoy Market)



Figure 4. Regular Village Visits by Zorlu Enerji Team (Kizildere Village)



Figure 5. Regular Village Visits by Zorlu Enerji Team (Karataş Village)

4.3 Community Investment Programme

As a means of implementing its sustainability policy, Zorlu Enerji prepares and implements a "social management plan" for its additional investments which goes beyond the mitigation measures. Zorlu Enerji has performed a series of Corporate Social Responsibility (CSR) activities in the region, which in turn is highly positive for the local people. CSR activities started in 2007 along with the Kizildere I and II projects and still continue today. Such activities include, but not limited to:

- Heating of 2500 dwellings and 500 decares of greenhouse;
- Financial support to local entrepreneurs for three hotels,
- Improvement of community facilities such as schools and mosques, and
- Improvement of infrastructure in villages.

The financial magnitude of the CSR Programme conducted between 2014-2016 period is about 2 Million Turkish Liras.

Other CSR activities can be listed as follows:

Scholarship Programme for 70 successful student from Buharkent and Sarayköy districts and villages (further information is available at <u>www.mzv.org</u>);

Sponsorship to Local Festivals in Buharkent for fig production and conservation of cultural traditions of camel wrestling;

Support to the Disadvantaged Children and Youth in Buharkent, in cooperation with Pamukkale University and District Governorship, Municipality and Directorate of National Education. The programme is entitled "Dunk Shot for Life" and aims at adaptation of the disadvantaged (addicted, victims or doers of crimes, those with families in prison, extremely poor, etc.) to the society. (Further information is available at <u>www.hayatasmac.com</u>). The activity has reached out to 150 children and the young by now.

Energy for Kids Project that has been conducted since 2010, supports 3rd and 4th grade primary school curriculum with awareness raising topics such as concepts of energy, energy resources, renewable and clean energy resources and energy conservations. Training of trainers is performed along with performing presentations and games for learning. Project activities also comprise organizing trips for all local stakeholders and their children to Zorlu Center in Istanbul for seeing theatre plays. (further information is available www.enerjimizcocuklaricin.com);

Small-Scale Community Infrastructure Projects such as:

- Supply of materials for the junction in Kizildere (www.buharkent.bel.tr)
- Support for the drinking and irrigation water supply in Kizildere Village by means of drilling of a deep well.
- Renovation of the community center in Kizildere Village

Support for the Vocational School in Buharkent, by means of supplying electronic Office equipment for the academicians for the 2016-2017 education year, as well as the establishment of the Conference Hall and laboratories for alternative energy resources;

Support to **Buharkent Directorate of Food, Agriculture and Livestock** for farmers training by means of supplying computers and printers (<u>http://www.buharkent.gov.tr/</u>);

Support to the Secondary School in Sarayköy for establishing an "information Technologies classroom" (http://saraykoygaziortaokulu.meb.k12.tr/);

Support to District Commandership of Gendarme for repairing its building;

Establishing orchards of figs and olives for transplanting 1000 trees including fig and olive trees which were taken out from the wellpad zone of Kizildere III, by means of transferring and planting the trees on a 35-decare

land allocated by the General Directorate of National Property. It is aimed that the plantation will be an income source for the Buharkent Municipality and the district economy.

Support for Sports by means of 2-years sponsorship of Kutbettin Bulut, a national body-building athlete who is an important figure in helping and inspiring social adaptation of disadvantaged children and the young.



Figure 6. Sponsorship to Local Festivals in Buharkent

Zorlu Enerji will continue to design and implement social investment projects in close cooperation with local authorities, communities and relevant NGOs in future. The planned projects for future will be based on key thematic areas such as

- Management of cumulative environmental and social impacts
- Income generating activities
- Skill development and vocational training
- Improvement of local infrastructure

Zorlu Enerji has developed "Supporting Agricultural Sustainability in Buharkent Project" with Adnan Menderes University. This Project will be executed once the University's approval procedure is resolved.

Zorlu Enerji will update information on social investment projects in its web site as soon as new activities are commenced.

5. Stakeholder Identification

For the purposes of this plan, a stakeholder is defined as any individual, organization or group who is potentially affected by the Project or who has an interest in the Project and its impacts. The purpose of stakeholder identification is to identify and prioritize Project stakeholders for consultation who may be affected (either directly or indirectly in positive or negative way) by the Project or who have an interest in the Project but are not necessarily directly impacted by the Project. As part of the stakeholder identification process, it is also important to identify individuals and groups that may be differentially or disproportionately affected by the Project because of their disadvantaged or vulnerable status. Stakeholder identification is an ongoing process, and thus stakeholders will continue to be identified during different stages of the Project.

Stakeholders that may potentially be impacted due to existing and future activities of Zorlu Enerji are considered to include primarily the following:

Farmers:

One of the primary stakeholder group is comprised of people directly affected by the project: communities in the vicinity of the project wellpads and power plant site. Based on the social survey performed within the context of the EIA process, Kizildere, Savcıllı, Karataş and Karakıran villages are the nearest settlements, located in Buharkent District. Population of the villages vary between 160 to 1850. Local economy is mainly based on agriculture, with livestock breeding and wage labour as side income sources. Besides wheat and maize production, fig gardens make up a significant economic resource. Hence, fig gardens are part of concerns raised by communities in relation to steam generation from geothermal wells of the Project. They doubt that steam could pose adverse impact on fig trees.

Neighbouring communities:

Communities are also affected by means of land acquisition process. Given that the Project did not result in physical displacement and that land has been acquired by purchase based on negotiated settlement and with the willingness of sellers, significance of land acquisition impacts can be considered low to insignificant.

Communities are affected also positively by the Project by means of employment opportunities and CSR activities of Zorlu Enerji.

Other stakeholder groups include:

- Administrative authorities (village muhtars, provincial directorates, regional development agency, etc.),
- NGOs that advocate rights and claims of communities;
- Research organizations, universities, consultants
- Local Media (Local Newsletters, local TV channels, etc.)
- Other GPPs in the region with similar impacts adding to the cumulative impacts with the Project
- JESDER (Association for GPP Investors)
- Professional Chambers (i.e. Chamber of Environmental Engineers, Chamber of Agriculture, etc.)

Elected village leaders "Muhtars" play an intermediary role by acting as a bridge between communities and external stakeholders from outside their localities. Although muhtars are not directly affected by the Project, they are important for transferring information and coordination.

Role of environmental NGOs and advocacy NGOs is important as they have the power to organize their members and support them speak for their rights. This would be highly useful if they act upon scientific knowledge and correct information, rather than misleading. Aydın Association of Environment and Culture (i.e. Aydın Çevre Kültür Derneği) is active in the region against possible negative impacts of GPPs.

The local media is particularly important for providing correct information that communities can rely on.

Administrative authorities such as the directorate on agriculture, district governorates, and researchers, agricultural consultants, and agricultural engineers assigned to villages by MoFAL are crucial for informing communities with correct and scientifically proven knowledge. Regional Development Agency will be of particular use in managing cumulative impacts.

Other GPPs are also significant stakeholders for Zorlu Enerji and the Project, in mainly two aspects: failures in mitigation measures that leave negative impressions and that trigger concerns of communities, and together with other GPPs Zorlu Enerji may give rise to cumulative impacts to be managed. Role of JESDER is crucial as well, particularly by bringing together GPPs in the region, and to act on a joint action plan, that contribute to building trust in communities toward geothermal power projects.

An elaboration of the relationships between stakeholders gives clues as to designate methods of engagement such as disclosure of information, coordination, cooperation, financial support, technical support.

6. Stakeholder Engagement Plan

Project related information will be disclosed on a dedicated page of Zorlu Enerji from December 8th, 2016. The local EIA Report, Non-technical Summary, this Stakeholder Engagement Plan, Environmental and Social Action Plan and related technical supplementary information will be available in English and Turkish and accessed through the following webpages:

In English: <u>http://www.zorluenerji.com.tr/en/corporate/2515/Kizildere-geothermal-power-plant-project</u> In Turkish: <u>www.zorluenerji.com.tr/tr/kurumsal/2514/kizildere-jeotermal-elektrik-santrali-projesi</u>

Information will also be publicized to affected communities through contextually appropriate avenues including the distribution of leaflets, on information boards within the community.

Further information on the Project, as well as copies of environmental and social impact assessment studies can be found by contacting Zorlu Enerji. Full ESIA documentation is available locally at Buharkent Municipality (in hard copy), Zorlu Enerji's head office and field office.

Zorlu Enerji will hold a public consultation meeting with key stakeholders in the region after disclosure of the documents for Kizildere III GPP capacity extension project. The meeting will be held at Buharkent beginning of 2017. The details on the meeting will be shared with the stakeholders in due course.

Zorlu Enerji plans to undertake the following disclosure and stakeholder engagement activities:

- Brief information about the Project published in local newspapers;
- ESAP and ESMP published on the official website of Zorlu Enerji in both Turkish and in English;
- ESAP and ESMP displayed at the entrance of the Site Office in Turkish; and in local newsletters;
- Meetings with local stakeholders to disclose the ESIA findings;
- Meetings on a regular basis with key stakeholders such as local authorities, university representatives, opinion makers and other industry representatives in the region as well as the Association of Geothermal Electrical Plant Investors (JESDER) to identify and manage the cumulative environmental and social impacts of the GPPs and other developments in the region and resolve community concerns in a coordinated manner;
- Regular meetings between Zorlu Enerji managers and provincial and district level public authorities and local NGOs;
- Regular meetings with Site Manager and muhtars throughout operation stage of the power plant;
- Grievance mechanism republished in local newspaper and displayed in community centers;
- Regular meetings with farmers together with the participation of Directorate of Food, Agriculture and Livestock as regards crop damages, mechanism for making claims and receiving payment, etc.
- Annual environmental and social reports comprised of Project impacts, undertaken mitigation and enhancement activities, published on Zorlu Enerji web site and submitted to the Lenders (i.e. EBRD);
- Social Investment Programme published on Zorlu Enerji web site and in local and national newsletters.

Zorlu Enerji will perform various methods of stakeholder engagement throughout construction and operation stages, as stated in table below:

| Stakeholder | Engagement Method | | |
|--|--|--|--|
| Communities | Information disclosed to residents through regular community meetings, use of public notice boards for project-related information, local media, etc. Community Investment Programme Including community members in decision-making for the Community Investment Programme Grievance mechanism | | |
| Farmers and farmer associations | Regular meetings with farmers Monitoring of agricultural yield Grievance mechanism | | |
| Village Muhtars | Regular meetings for evaluating grievances Disclosing project information | | |
| NGOs (Aydın Kültür Derneği, etc.) | Bringing NGOs together with Agricultural Consultants in the Region as well as University members, etc. | | |
| JESDER | Regular meetings by bringing together other GPPs in relation to their cumulative impacts and possible joint actions to be taken in coordination | | |
| Agricultural Consultants in the Region | Regular meetings with the participation of invited scientists and experts | | |
| Administrative Authorities | Official correspondence and meetings, project progress updates and reports, monitoring of agricultural productivity | | |
| Local media | Continuous contact for training journalists on geothermal energy; Publishing correct information on impacts and mitigation measures | | |
| Other GPPs in the region | Cooperation on common grounds, joint action plans and management of cumulative impacts | | |

Table 1. Stakeholder Engagement Plan

Zorlu Enerji will coordinate events with the participation of local authorities, university representatives, opinion makers and other industry representatives in the region as well as the Association of Geothermal Energy to identify and manage the cumulative impacts of the geothermal projects and other developments in the region.

Zorlu Enerji will also concert the best effort to set up and lead the regional network of geothermal investors with a view to discussing cumulative HSE and socio-economic issues and opportunities for the region. In this context, Zorlu Enerji will share their own experiences with other industries with the aim of setting up common HSES standards for geothermal projects and a common environmental social monitoring programme, and development of regional action plans where each responsibilities of each party are clearly defined.

7. Grievance Mechanism

A grievance mechanism is in place, comprising of grievance procedure and associated grievance form and record of grievances. Samples for a grievance form and log are provided at the end of this section. Grievances and details of responses are reported internally on quarterly basis.

Zorlu Enerji has disclosed its grievance procedure through the Environmental and Corporate Responsibility Manager to district municipalities of Buharkent and Sarayköy, village muhtars and the Project Manager. In this respect; mayors, muhtars and project staff are responsible for receiving grievances. It is required that a written record of grievance is kept and verbally communicated with the Environmental and Corporate Responsibility Manager of Zorlu Enerji at contact details:

Phone: +90 212 456 28 38

GSM: +90 549 727 34 11

Fax: +90 212 422 00 99

Address: Büyükdere Cd. Levent 199, No : 199 34394 Şişli / İSTANBUL

8. Resources and Responsibilities

The implementation of this SEP will be conducted and monitored by Zorlu Energi CSR Department The Company will assume an overall responsibility for undertaking and supervising engagement with all stakeholders in relation to the Project and will use available resources to ensure that the relevant activities (such as disclosure of Project information, public consultation activities and the management of the Project specific grievances are conducted effectively and to the appropriate standard.

The construction contractors will be monitored closely in order to comply with the requirements of this SEP. They will report to Zorlu Enerji on regular basis with regards to engagement activities and grievances submitted to them directly.

Appendix A Sample Grievance Form and Sample Grievance Log of the Project

| GRIEVANCE FORM | | | |
|----------------------------|----------|-----------------------|---------------|
| Person Receiving Grievance | Name | | |
| | Position | | |
| GRIEVANCE HOLDER | | Means of Co | orrespondence |
| Name | | Phone | |
| Phone | | Meeting(s) | |
| Address | | Contact at the Office | |
| Village | | Email/Mail | |
| Signature (optional) | | Site visit | |
| | | Other | |
| GRIEVANCE: | | 1 | |
| | | | |

| EVALUATION OF GRIEVANCE | Damage to household and livelihood | | | | |
|---------------------------|------------------------------------|--|--|--|--|
| | Environmental and Social | | | | |
| | Expropriation | | | | |
| | Labour | | | | |
| | Other | | | | |
| Is compensation required? | | | | | |
| □Yes □No | | | | | |
| RESULT | | | | | |
| CLOSURE NOTE | | | | | |
| Authorised Person | Grievance Holder | | | | |
| Name | Name | | | | |
| Date and Signature | Date and Signature | | | | |
| | | | | | |

Sample Grievance Log of the Project

| Date of grievance received | Grievance Holder | Grievance | Response Measure | Closure Remark |
|----------------------------|------------------|-----------|------------------|----------------|
| | | | | |
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