Enerjisa Distribution Investments Project

Stakeholder Engagement Plan

August 2026

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ABBREVIATIONS AND ACRONYMS

CBO	Community Based Organizations
CLO	Community Liaison Officer
EBRD	European Bank for Reconstruction and Development
E&S	Environmental and Social
EHS	Environment Health and Safety
EMO	Turkish Chamber of Electrical Engineers (Elektrik Mühendisleri Odası),
ESG	Environmental, Social and Governance
ESR	Environmental and Social Requirement
GBVH	Gender based violence and harassment
GM	Grievance Mechanism
HR	Human Resources
NGO	Non-Governmental Organisation
OHS	Occupational health and safety
SEA	Sexual exploitation and abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SMS	Short Message Service (text messaging)

1 INTRODUCTION

1.1 OVERVIEW

This Stakeholder Engagement Plan (SEP) has been prepared for the proposed Green Electricity Distribution Investment Programme (the Project), for which Enerjisa Enerji A.Ş. (Enerjisa) is seeking financing from the European Bank for Reconstruction and Development (EBRD).

The Project comprises a portfolio of electricity distribution investments to be implemented across the AYEDAŞ, Başkent EDAŞ and Toroslar EDAŞ distribution regions during the 2026-2030 investment period. The Project is intended to support the modernisation, reinforcement, expansion and digitalisation of electricity distribution infrastructure and to improve the reliability, resilience and efficiency of electricity supply across Enerjisa's service areas.

This SEP has been prepared in accordance with the requirements of the EBRD Environmental and Social Policy (2024), including Environmental and Social Requirement 10 (ESR10): *Information Disclosure and Stakeholder Engagement*, and applicable legislation of the Republic of Türkiye.

The SEP establishes the framework through which stakeholders will be identified, informed, consulted and engaged throughout implementation of the Project. It also describes the arrangements for information disclosure, stakeholder feedback, grievance management, monitoring and reporting.

1.2 NATURE OF THE INVESTMENT PROGRAMME

The Project differs from a conventional infrastructure project in that it comprises a rolling programme of investments that will be developed and implemented progressively throughout the investment period. At the time of preparation of this SEP, the overall types of investments are known; however, the precise scope, location, timing and design of individual investment packages will continue to evolve over time.

The Project forms part of Enerjisa's 2026-2030 investment programme and includes investments intended to accommodate new electricity demand, increase network capacity, improve quality and reliability of electricity supply, enhance operational efficiency and system flexibility; strengthen resilience to climate-related and operational risks, support digitalisation and network automation; and maintain compliance with regulatory and operational requirements.

Because future investment packages have not yet been fully defined, this SEP adopts a programme-level approach. The SEP establishes the principles, procedures and minimum requirements that will apply across the Project while allowing stakeholder engagement activities to be tailored to the specific characteristics and risks of individual investment packages as they are identified.

While many investments are expected to involve upgrades within existing electricity distribution corridors and facilities, others may comprise new developments such as substations, distribution infrastructure or associated facilities where required to improve network performance and reliability. Where future investment packages have the potential to result in more significant environmental or social impacts, additional package-specific engagement arrangements may be developed in accordance with this SEP and Enerjisa's environmental, social, health and safety management systems.

1.3 PURPOSE OF THIS STAKEHOLDER ENGAGEMENT PLAN

The purpose of this SEP is to establish a transparent, systematic and proportionate approach to stakeholder engagement throughout the lifecycle of the Project. Specifically, the SEP aims to:

- ✓ Identify stakeholders with an interest in the Project or who may be affected by Project activities;
- ✓ Establish procedures for identifying stakeholders associated with future investment packages;
- ✓ Ensure stakeholders receive timely, accessible and relevant information;
- ✓ Provide opportunities for meaningful consultation and participation;
- ✓ Facilitate consideration of stakeholder views during Project implementation;
- ✓ Establish accessible mechanisms for receiving and responding to stakeholder concerns and grievances;
- ✓ Support engagement with vulnerable and disadvantaged stakeholders; and
- ✓ Demonstrate compliance with the requirements of EBRD ESR10.

The SEP is intended to function as a practical implementation tool that builds on the existing corporate and subsidiary level engagement activities being undertaken, and will be used alongside Enerjisa's environmental, social, health and safety management systems and supporting corporate procedures identified in Section 1.5.

1.4 SCOPE

This SEP applies to all investment packages financed under the Green Electricity Distribution Investment Programme. The SEP establishes minimum stakeholder engagement requirements applicable across the Project while recognising that individual investment packages may require different levels of engagement depending upon their location, scale and potential environmental and social impacts. For each investment package Enerjisa will:

- ✓ Identify affected and interested stakeholders including vulnerable or disadvantaged groups;
- ✓ Determine the appropriate level of consultations and information disclosure;
- ✓ Undertake consultation that is appropriate to the characteristics of the investment;
- ✓ Maintain accessible grievance mechanisms; and
- ✓ Document stakeholder engagement activities and outcomes.

The templates included in the Annexes are intended to support implementation of these processes.

1.5 RELATIONSHIP WITH ENERJISA'S CORPORATE STAKEHOLDER ENGAGEMENT FRAMEWORK AND INFORMATION DISCLOSURE FRAMEWORK

Enerjisa maintains established stakeholder engagement, communication, grievance-management and information-disclosure systems across its electricity distribution operations. These systems provide the foundation for implementation of this SEP and will be used to support stakeholder engagement associated with the Project. This SEP should be read and implemented together with the following corporate systems and documents:

- ✓ Enerjisa's environmental, social, health and safety management systems;
- ✓ Corporate Stakeholder Engagement Strategy Guide

Corporate Stakeholder Engagement Plan

- ✓ Land Acquisition Procedure;
- ✓ Sustainability Strategy and Sustainability Reports;
- ✓ Code of Ethics;
- ✓ Human Rights Policy;
- ✓ Anti-Bribery and Anti-Corruption Policy;
- ✓ Third Party Relations Policy;
- ✓ ENETİK Ethics Reporting System and Procedures;
- ✓ Contractor Code of Conduct; and
- ✓ Labour Management Procedures (where applicable).

These corporate arrangements provide existing communication channels, stakeholder databases, customer communication systems, grievance-management mechanisms and governance arrangements that will support implementation of this SEP. Stakeholder engagement associated with the Project will therefore build upon Enerjisa's established engagement practices with customers, regulators, public institutions, municipalities, governorships, mukhtars, contractors, suppliers, educational institutions, civil society organisations, landowners and local communities.

This SEP establishes the stakeholder engagement framework for the Enerjisa Distribution Investments Project. It is expected that each subsidiary will have in place its own SEPs prepared to cover AYEDAŞ and Başkent EDAŞ (under development) and Toroslar EDAŞ (which is already in place), that these will support implementation of stakeholder engagement activities within their respective licence areas and are updated periodically in accordance with the Corporate Stakeholder Engagement Strategy Guide. Where Project-financed investments are implemented within these regions, stakeholder engagement activities will be undertaken in a manner consistent with both this SEP and the applicable subsidiary-level stakeholder engagement arrangements.

2 PROJECT DESCRIPTION

2.1 PROJECT OVERVIEW

The Enerjisa Distribution Investments Project comprises a portfolio of electricity distribution investments to be implemented across the AYEDAŞ, Başkent EDAŞ and Toroslar EDAŞ distribution regions in Türkiye. The Project supports Enerjisa's ongoing investment programme for the modernisation, reinforcement, expansion and digitalisation of electricity distribution infrastructure and is intended to improve security of supply, operational performance, network resilience and service reliability across the Company's service areas.

Indicative investment categories include:

- ✓ Capacity increase investments;
- ✓ Voltage conversion investments;
- ✓ Refurbishment and renewal of existing electricity distribution infrastructure;
- ✓ Electricity transmission and distribution line investments;
- ✓ Public lighting investments;
- ✓ SCADA and network automation investments;
- ✓ Reactive power compensation investments;
- ✓ Automatic Meter Reading (AMR) investments; and
- ✓ Service buildings, operational facilities, fixtures and equipment investments.

The final composition of the investment programme will continue to evolve throughout implementation, and individual investment packages will be identified, prioritised and developed in accordance with Enerjisa's established investment planning processes.

2.2 PROJECT AREA

The Project will be implemented within the licensed electricity distribution service areas of Başkent EDAŞ; AYEDAŞ; and Toroslar EDAŞ (Figure 2.1). Collectively, these distribution regions cover fourteen provinces and include metropolitan, urban, peri-urban and rural environments containing existing electricity distribution infrastructure as well as locations where future network expansion may be required. Most investments are expected to occur within existing operational corridors, substations, operational facilities and established rights-of-way. However, some future investments may involve network expansion, new substations, new facilities or transmission and distribution line developments that extend beyond existing operational footprints.

Because the precise scope and location of all future investment packages have not yet been defined, stakeholders affected by individual investments cannot be comprehensively identified at this stage. Stakeholder identification and engagement requirements will therefore be refined as individual investment packages are screened and developed.

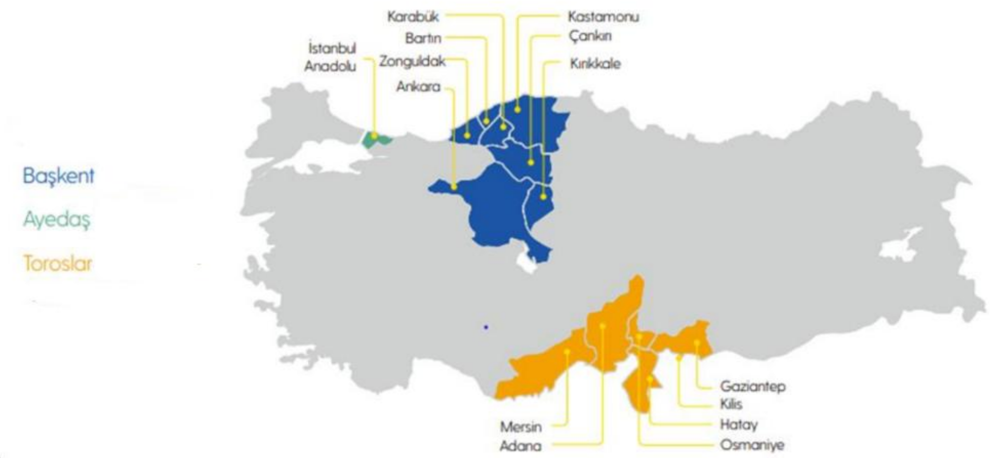

Figure 2.1: Project Areas

2.3 ENVIRONMENTAL AND SOCIAL CONTEXT

The majority of investments currently anticipated under the Project are expected to be implemented within existing electricity distribution corridors and operational facilities and are therefore anticipated to result primarily in temporary and localised environmental and social impacts.

Potential environmental and social issues associated with future investment packages may include:

- ✓ Temporary traffic disruption;
- ✓ Temporary access restrictions;
- ✓ Construction noise and dust;
- ✓ Vegetation management;
- ✓ Temporary interruptions to electricity supply;
- ✓ Contractor workforce interactions with local communities; and
- ✓ Occupational and community health and safety risks;
- ✓ Temporary disturbance to businesses and road users; and
- ✓ Land access requirements or land acquisition or easement requirements associated with selected investments.

Engagement with landowners, land users and local communities is expected to arise mainly in connection with distribution-line investments and associated land acquisition, easement and access requirements. Based on current planning information, these requirements are most likely to occur within the Başkent EDAŞ and Toroslar EDAŞ distribution regions.

2.4 EXISTING STAKEHOLDER ENGAGEMENT COMMUNITY OUTREACH AND SOCIAL INVESTMENT ACTIVITIES

Enerjisa maintains established stakeholder engagement arrangements across all three distribution regions. Stakeholder engagement is undertaken routinely with public institutions, regulators, municipalities, governorships, district authorities, mukhtars, customers, contractors, landowners, educational institutions, civil society organisations and local communities. Existing engagement activities provide an established platform through which the stakeholder engagement commitments contained in this SEP will be implemented. The initiatives described below demonstrate Enerjisa's existing approach to community engagement and are expected to continue throughout implementation of the Project.

Engagement activities are conducted through a combination of:

- ✓ Coordination and consultation meetings;
- ✓ Stakeholder visits;
- ✓ Customer communication channels;
- ✓ Customer service centres;
- ✓ Websites and digital platforms;
- ✓ Mobile applications;
- ✓ Customer surveys;
- ✓ Community awareness programmes;
- ✓ Educational initiatives;
- ✓ Sustainability partnerships;
- ✓ Community development programmes; and
- ✓ Grievance-management systems.

2.4.1 Public Disclosure Activities

Enerjisa publicly discloses sustainability and ESG information through its annual Sustainability Reports, Integrated Annual Reports and TSRS-aligned sustainability disclosures. Public reporting includes information on sustainability strategy and targets, climate-related risks and opportunities, environmental and social performance, stakeholder engagement, grievance mechanisms, workforce matters, community investment activities, responsible supply chain management and corporate governance performance. Sustainability disclosures are publicly available through Enerjisa's corporate and Investor Relations websites.

2.4.2 Existing Operational Stakeholder Engagement

Enerjisa maintains annual stakeholder engagement plans for its three distribution companies: AYEDAŞ, Başkent EDAŞ and Toroslar EDAŞ. These plans identify priority stakeholder groups and planned engagement activities. Existing stakeholder engagement arrangements include customer communication systems, community programmes, sustainability reporting and partnerships with public institutions and other organisations. Stakeholder engagement activities regularly undertaken by the distribution companies include those outlined in Table 2.1.

Table 2.1: Examples of Operational Stakeholder Engagement Activities

Stakeholder Group	Typical Engagement Activities
Public authorities and regulators	Engagement with ministries, TEDAŞ, TEİAŞ, AFAD, municipalities, governorships and public institutions regarding network investments, public lighting, infrastructure coordination, outages, emergency preparedness and service delivery.
Mukhtars	Ongoing communication through meetings, visits, telephone communication, the WhatsApp Muhtar Support Line and priority customer communication channels.
Landowners and land users	Consultation regarding easements, land acquisition, land access, expropriation processes and transmission-line developments where required.
Customers	Customer communication through service centres, call centres, websites, mobile applications, social media channels, SMS notifications and customer surveys.
Contractors and suppliers	Contractor-management meetings, audits, inspections, OHS meetings and project coordination activities.
Professional organisations	Engagement with Turkish Chamber of Electrical Engineers (Elektrik Mühendisleri Odası), Turkish Chamber of Electrical Technicians (Elektrik Teknisyenleri Odası) and other professional associations regarding technical, operational and customer connection matters.

2.4.3 Community Health and Electrical Safety Awareness Activities

Enerjisa implements community health and safety initiatives intended to improve public awareness of electrical hazards and reduce third-party electrical accidents. These initiatives include meetings with mukhtars and local representatives, community awareness sessions, public-information campaigns, electrical safety presentations, distribution of safety-awareness materials, social media campaigns and stakeholder engagement events focusing on accident prevention and safe behaviour around electricity infrastructure.

Topics addressed include electrical safety culture, safe approach distances near electricity infrastructure, prevention of third-party accidents, emergency reporting procedures, community responsibilities relating to electrical safety and community health and safety awareness.

2.4.4 Community Development, Educational and Sustainability Programmes

In addition to operational stakeholder engagement activities, Enerjisa implements a range of community investment, educational and sustainability initiatives that support ongoing engagement with communities, schools, businesses, NGOs and development partners. Key programmes include the following described below.

Better Future Platform

A sustainability and productivity initiative supporting small and medium-sized enterprises through training programmes, awareness activities, stakeholder events and business-support tools. Activities are expected to continue throughout 2026 and beyond.

SENTRUM

A sustainable tourism and local development initiative in collaboration with UNDP and TGA intended to support local economic development, energy efficiency and sustainable tourism. Following implementation in Küçükköy and Birgi, activities are planned to expand to Göynük.

Enerjimi Koruyorum (I Protect My Energy)

A national educational initiative promoting energy efficiency, sustainable living and renewable-energy awareness among schoolchildren. The programme has reached approximately 400,000 children in around 750 schools and will continue through an updated educational programme during 2026 and beyond.

Green and Digital Skills in the Energy Sector

An initiative developed in collaboration with EBRD and UNDP ICPSD partners to support vocational education, workforce development and skills required for the green transition. Implementation of vocational training activities is planned from 2026 onwards.

Hatay Workforce Development Initiative

An initiative in collaboration with EBRD and IDEMA focused on workforce development and local-business capacity building within earthquake-affected communities in Hatay Province. Training and development activities are planned following completion of field assessments.

Teachers are Worth It

A programme supporting educational innovation and learning effectiveness through teacher-development initiatives and dissemination of innovative teaching practices. The second phase of the programme is expected to continue during 2026.

2.5 EXISTING AND PLANNED STAKEHOLDER ENGAGEMENT ACTIVITIES (2026-2027)

Stakeholder engagement activities planned during the 2026-2027 period are largely a continuation of those already being conducted and include:

- ✓ Regular engagement with municipalities and public authorities regarding electricity distribution investments and infrastructure coordination;
- ✓ Customer communications relating to planned outages, network improvements and service delivery;
- ✓ Community awareness activities on electrical safety and energy efficiency;
- ✓ Engagement with mukhtars and local community representatives;
- ✓ Consultation activities relating to land access and easement requirements where relevant;
- ✓ Engagement with regulators, technical institutions and infrastructure operators;
- ✓ Contractor management and occupational health and safety engagement activities;
- ✓ Sustainability reporting and climate-related disclosures; and
- ✓ Environmental and social monitoring and reporting to lenders.

These activities are expected to continue throughout implementation of the investment programme and may be supplemented by package-specific stakeholder engagement activities where this is needed. Further details regarding stakeholder engagement requirements and information disclosure arrangements are provided in Section 6.

3 REGULATORY AND CORPORATE FRAMEWORK

3.1 INTRODUCTION

This SEP has been prepared in accordance with the stakeholder engagement requirements of the EBRD Environmental and Social Policy (2024) and applicable legislation of the Republic of Türkiye. The SEP also builds upon Enerjisa's existing corporate stakeholder engagement arrangements, which provide the foundation for ongoing communication with its customers, employees, contractors, regulators, public authorities and communities. As this is a programme-level SEP, the framework presented below applies to all investments financed under the Project. Additional requirements may be identified through environmental and social screening of individual investment packages.

3.2 APPLICABLE REQUIREMENTS

Stakeholder engagement activities undertaken under the Project will be guided by the following requirements and standards:

3.2.1 National Framework

The implementation of this SEP will also take account of applicable Turkish legislation governing public consultation, land acquisition and expropriation access to information and freedom of expression (summarised in Table 3.1). Other requirements that may govern engagement include environmental management, labour and occupational health and safety, community health and safety, administrative procedures and public authority engagement; and operation and regulation of electricity distribution infrastructure.

Where differences exist between national requirements and EBRD requirements, the more stringent requirement will be applied for activities financed under the Project.

Table 3.1: Overview of national Framework for Stakeholder Engagement

Legislation / Regulation	Key Stakeholder Engagement Requirements	Relevance to SEP
Constitution of the Republic of Turkey	Guarantees freedom of thought and opinion (Art. 25), freedom of expression and access to information (Art. 26), and the right to submit requests and complaints to public authorities (Art. 74).	Provides the constitutional basis for stakeholder participation, access to information, and grievance mechanisms.
Law on the Right to Information (No. 4982, 2003)	Establishes the public's right to obtain information from public institutions in accordance with principles of transparency, equality, and accountability.	Supports disclosure of project information and stakeholder access to information.
Law on the Use of the Right to Petition (No. 3071, 1984)	Allows Turkish citizens and eligible foreign residents to submit written petitions, requests, and complaints to public authorities.	Provides a legal basis for stakeholder feedback and grievance submission.
Expropriation Law (No. 2942, 1983)	Regulates compulsory land acquisition and ensures procedures are undertaken according to legal requirements and due process.	Relevant where project land acquisition or easement processes affect landowners and users.
Environment Law (No. 2872, 1983)	Establishes principles for environmental protection and sustainable development.	Provides the overarching legal framework for environmental management and public interest considerations.
Environmental Impact Assessment (EIA) Regulation (2022)	Regulates environmental assessment and associated consultation processes for projects subject to EIA requirements.	Transmission lines below 154 kV and electricity distribution lines/facilities are exempt from the Turkish EIA Regulation; therefore, Enerji operations are not subject to national EIA consultation requirements.

3.2.2 International Requirements

- ✓ EBRD Environmental and Social Policy (2024);
- ✓ EBRD Environmental and Social Requirement 10 (ESR10): *Information Disclosure and Stakeholder Engagement*;
- ✓ Environmental and Social Requirement 10 (ESR 10): Stakeholder Engagement Guidance Note
- ✓ EBRD Environmental and Social Requirement 1 (ESR1): *Assessment and Management of Environmental and Social Risks and Impacts*;
- ✓ EBRD Environmental and Social Requirement 2 (ESR2): *Labour and Working Conditions*;
- ✓ EBRD Environmental and Social Requirement 4 (ESR4): *Community Health and Safety*; and
- ✓ other applicable EBRD requirements relevant to specific investment packages.

ESR10 requires project proponents to identify stakeholders, disclose relevant information, undertake meaningful consultation, provide opportunities for participation, establish grievance mechanisms and maintain ongoing stakeholder engagement throughout the project lifecycle.

The EBRD's Independent Project Accountability Mechanism (IPAM), as an independent process, aims to facilitate the resolution of social, environmental and public disclosure issues raised by project-affected people and civil society organisations (CSOs) about EBRD-financed projects, or to determine whether the Bank has complied with its ESP and the project-specific provisions of its Access to Information Policy; and, where applicable, to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

3.2.3 Relationship with Enerjisa Corporate Framework

The Project will utilise Enerjisa's existing stakeholder engagement, communication and grievance-management systems wherever possible. Enerjisa has established procedures and communication channels that support ongoing engagement with regulators, public authorities, municipalities, customers, contractors, communities, educational institutions, civil society organisations and other stakeholders throughout its areas of operation. Implementation of this SEP will therefore be integrated into existing management processes rather than creating a separate stakeholder engagement system for the Project.

The following corporate documents and management systems are considered particularly relevant to implementation of this SEP and are summarised in Table 3.2.

Table 3.2: Relationship between this SEP and Enerjisa's Corporate Framework

Corporate Document / System	Relevance to SEP Implementation
Enerjisa's corporate environmental and social management processes	Identification and management of environmental and social risks and social risk information relevant to stakeholder engagement activities.
Corporate Stakeholder Engagement Strategy Guide	Stakeholder identification, mapping, engagement planning, communication and reporting
Sustainability Strategy and Sustainability Reports	Sustainability commitments, stakeholder engagement priorities and reporting
Code of Ethics	Ethical conduct, accountability and stakeholder relationships
Human Rights Policy	Human rights commitments and stakeholder protections
Anti-Bribery and Anti-Corruption Policy	Management of corruption-related concerns and ethical behaviour
Third Party Relations Policy	Expectations for suppliers, contractors and other external parties
ENETİK Ethics Reporting System	Confidential reporting and investigation of ethics-related concerns
Contractor Code of Conduct	Contractor obligations relating to stakeholder behaviour, community interactions and grievance reporting
Labour Management Procedures (where applicable)	Management of workforce consultation and worker grievances

The Project SEP builds upon these existing corporate arrangements and establishes the additional requirements necessary to satisfy EBRD stakeholder engagement obligations for the Project. In practice, this means that existing communication channels will be used for disclosure of Project information where appropriate. Existing stakeholder relationships with municipalities, governorships, regulators and communities will support Project engagement activities. Project-related grievances will be managed through Enerjisa's existing grievance-management systems and tracked separately for Project reporting purposes. Investment package-specific stakeholder engagement activities developed will be identified through environmental and social risk assessment screening to identify the need for enhanced engagement. Finally, stakeholder engagement outcomes will be incorporated into Project monitoring and reporting processes.

Stakeholder engagement activities undertaken under this SEP will utilise existing stakeholder engagement, customer management, risk-management and grievance management processes where appropriate. Information obtained through these systems, including social risks identified through the Qualitative Risk Reporting Procedure (EE-P-751), stakeholder concerns and planned investment activities, will be considered when determining stakeholder engagement requirements for individual investment packages.

4 STAKEHOLDER ENGAGEMENT APPROACH

4.1 OBJECTIVES

Stakeholder engagement is a key component of the Project's environmental and social management approach. Given the programme-based nature of the Project, stakeholder engagement will be an ongoing process that evolves as individual investment packages are developed and implemented.

The objectives of this SEP are to:

- ✓ Provide timely and accessible information regarding Project activities;
- ✓ Identify and engage relevant stakeholders in a manner proportionate to the characteristics of Project investments;
- ✓ Provide opportunities for stakeholders to raise concerns and provide feedback;
- ✓ Ensure vulnerable and disadvantaged stakeholders are appropriately considered in stakeholder engagement activities; and
- ✓ Support compliance with EBRD ESR10 and applicable national requirements.

4.2 STAKEHOLDER ENGAGEMENT APPROACH

Stakeholder engagement will be undertaken at two complementary levels:

1. Existing Corporate Level; and
2. Project Level;.

This approach enables the Project to utilise Enerjisa's existing stakeholder engagement arrangements while implementing additional project-specific stakeholder engagement measures where needed.

4.2.1 Corporate Level

Enerjisa maintains established stakeholder engagement arrangements across its operations. Corporate-level stakeholder engagement activities are guided by the Corporate Stakeholder Engagement Strategy Guide and relevant corporate procedures and are implemented through annual stakeholder engagement workplans prepared by AYEDAŞ, Başkent EDAŞ and Toroslar EDAŞ.

Existing arrangements include customer communication channels, stakeholder consultations, sustainability disclosures, community outreach and educational programmes, and grievance-management mechanisms.

4.2.2 Project Level

This SEP establishes the stakeholder engagement framework for the Project and the process through which stakeholder engagement requirements for individual investment packages will be determined. It is expected that most investment packages will comprise routine electricity distribution investments that can be adequately supported through Enerjisa's existing corporate-level stakeholder engagement arrangements. Where investment packages have the potential to involve greater environmental or social risks and impacts, land-related issues, vulnerable stakeholders or elevated stakeholder sensitivities, the Project Team will undertake a stakeholder engagement assessment to determine whether additional project-specific stakeholder engagement measures are required.

The assessment will take into consideration:

- ✓ The location of the investment;
- ✓ The nature and scale of the planned works;
- ✓ Potential environmental and social risks and impacts;
- ✓ Stakeholder interest or sensitivity;
- ✓ Community health and safety considerations;
- ✓ Land acquisition, easement or land-access requirements;
- ✓ The presence of vulnerable or disadvantaged stakeholders; and

- ✓ Applicable regulatory or lender requirements.

Additional project-specific stakeholder engagement measures are discussed in Section 6.

4.3 PRINCIPLES OF ENGAGEMENT

Stakeholder engagement activities undertaken under this SEP will be guided by the following principles.

Transparency: stakeholders will be provided with timely and understandable information regarding relevant Project activities.

Inclusiveness and accessibility: stakeholder engagement activities will seek to facilitate participation by affected and interested stakeholders, including vulnerable and disadvantaged stakeholders.

Proportionality: the level of stakeholder engagement undertaken will be proportionate to the characteristics and potential risks and impacts of individual investment packages.

Responsiveness: stakeholder feedback and grievances will be considered and addressed through appropriate management processes.

Good faith engagement: stakeholder engagement activities will be undertaken in a respectful and constructive manner.

5 STAKEHOLDER IDENTIFICATION AND ANALYSIS

5.1 STAKEHOLDER IDENTIFICATION

Stakeholder identification is an ongoing process that will be reviewed as individual investment packages are identified and developed. Given the programme-based nature of the Project, the precise scope, location and characteristics of future investment packages will continue to evolve throughout implementation.

This SEP identifies the stakeholder groups currently considered relevant to the Project based on the anticipated investment types, existing stakeholder relationships and stakeholder engagement activities across the AYEDAŞ, Başkent EDAŞ and Toroslar EDAŞ distribution regions.

Where required, the Project Team will review whether individual investment packages may affect additional stakeholders or require additional stakeholder engagement measures.

5.2 PROJECT-LEVEL STAKEHOLDERS

The stakeholder groups currently considered most relevant to implementation of the Project are presented in Table 5.1.

Table 5.1: Main Project Stakeholders

Stakeholder Group	Relevance to the Project
Project-Affected People	
Mukhtars and local community representatives	Local information sharing, communication of community concerns and support for stakeholder engagement activities
Communities located near investment activities	Potentially affected by Project activities, construction impacts and service interruptions
Landowners and land users	Potential easement, access or land-acquisition requirements associated with certain investments
Customers (residential, commercial and industrial)	Service reliability, planned outages, network investments and customer service
Vulnerable customers (including customers dependent on electrically powered medical devices)	May require targeted communications relating to planned outages, emergency preparedness and service interruptions.
Businesses and road users	Temporary construction-related impacts
Educational facilities and public institutions located near investments	Potential operational or construction-related impacts
Infrastructure coordination bodies and public utilities	Utility coordination, infrastructure crossings, relocations and network planning
Interested Parties	
Governorships and district governorates	Local administration, emergency preparedness, permitting and coordination of Project activities
Municipalities and metropolitan municipalities	Infrastructure coordination, street lighting, permitting, traffic management and local stakeholder concerns
Government ministries and national authorities	Energy policy, environmental regulation, labour regulation, emergency preparedness and national infrastructure priorities
Sector regulators and infrastructure agencies	Distribution-sector regulation, coordination and infrastructure planning
EBRD and other lenders	Oversight of Project implementation, environmental and social performance and compliance with financing requirements
Shareholders, investors and analysts	Corporate performance, governance, sustainability and investment performance
Professional organisations and technical bodies	Technical coordination, industry development and information exchange
Educational institutions	Workforce development, educational programmes and skills initiatives

Stakeholder Group	Relevance to the Project
Civil society organisations and NGOs	Environmental, social, consumer and community interests
Media organisations	Public information and communication

Vulnerable and disadvantaged stakeholders are discussed in Section 5.3.

5.3 VULNERABLE AND DISADVANTAGED STAKEHOLDERS

Particular consideration will be given to stakeholders who may experience barriers to participation in stakeholder engagement activities or who may be disproportionately affected by Project activities. Based on existing customer management systems and stakeholder engagement activities undertaken across Enerjisa's distribution regions, vulnerable or disadvantaged stakeholders may include:

- ✓ Elderly persons;
- ✓ Persons with disabilities;
- ✓ Persons with chronic illnesses;
- ✓ Customers dependent upon electrically powered medical devices;
- ✓ Families of martyrs and veterans;
- ✓ Economically disadvantaged households;
- ✓ Persons with limited literacy;
- ✓ Isolated rural communities;
- ✓ Women and female-headed households where relevant; and
- ✓ Other vulnerable stakeholders identified during investment package planning and stakeholder engagement activities.

Existing customer management systems currently identify approximately 1.34 million customers aged over 65 years, approximately 21,000 families of martyrs and veterans; and approximately 3,400 customers dependent upon electrically powered medical devices through the Hasta Var Programme.

Where relevant, stakeholder engagement activities may be adapted to facilitate participation by vulnerable or disadvantaged stakeholders. Such measures may include targeted notifications and communications, direct engagement, accessible communication methods and additional consultation activities where required.

5.4 STAKEHOLDER IDENTIFICATION DURING PROJECT IMPLEMENTATION

As individual investment packages are identified and developed, the Project Team will review whether existing corporate stakeholder engagement arrangements are sufficient or whether additional project-specific stakeholder engagement measures are required. For most investment packages, existing corporate stakeholder engagement arrangements are expected to provide an appropriate and proportionate means of communicating with stakeholders and managing stakeholder concerns.

The stakeholder engagement requirements assessment will consider:

- ✓ Stakeholders who may be affected by the investment package;
- ✓ The nature and scale of the planned works;
- ✓ Potential environmental and social risks and impacts;
- ✓ Community health and safety considerations;
- ✓ Land acquisition, easement or land-access requirements;
- ✓ Planned outages and service interruptions;
- ✓ Stakeholder interest, sensitivities or public concerns;
- ✓ The presence of vulnerable or disadvantaged stakeholders; and
- ✓ Applicable regulatory or lender requirements.
- ✓ Defining the area of influence of the investment package;

Where additional stakeholder engagement measures are required, the assessment will determine:

- ✓ Which stakeholders should be engaged;
- ✓ The appropriate level of stakeholder engagement;
- ✓ Information disclosure requirements;
- ✓ The most appropriate engagement methods;
- ✓ Whether additional consultation activities are necessary; and
- ✓ Whether specific measures are required for vulnerable or disadvantaged stakeholders.

Stakeholder engagement activities associated with Project-financed investments will build upon Enerjisa's existing corporate stakeholder engagement arrangements and annual stakeholder engagement planning processes undertaken by AYEDAŞ, Başkent EDAŞ and Toroslar EDAŞ. Where investment packages involve potentially greater environmental or social risks and impacts, land-related issues or elevated stakeholder sensitivities, additional stakeholder engagement measures may be implemented. These measures are described further in Section 6.

Stakeholder information and engagement activities will be documented through existing stakeholder engagement planning, monitoring and reporting processes.

6 STAKEHOLDER ENGAGEMENT, INFORMATION DISCLOSURE AND CONSULTATION

6.1 GENERAL APPROACH

Stakeholder engagement activities associated with the Project will primarily use Enerjisa's existing corporate stakeholder engagement arrangements, communication channels and stakeholder relationships. These arrangements are expected to be appropriate for the majority of investment packages financed under the Project.

Where the stakeholder engagement requirements assessment described in Section 5 identifies the need for additional stakeholder engagement measures, project-specific information disclosure and consultation activities will be implemented as appropriate to the characteristics and potential impacts of the relevant investment package.

Particular attention will be given to engagement with potentially affected communities, local authorities, landowners and land users, vulnerable or disadvantaged stakeholders and other stakeholders who may be affected by Project activities.

6.2 PLANNED STAKEHOLDER ENGAGEMENT ACTIVITIES (2026-2027)

Enerjisa maintains annual stakeholder engagement workplans for AYEDAŞ, Başkent EDAŞ and Toroslar EDAŞ which identify priority stakeholder groups, planned engagement activities and responsible departments. Stakeholder engagement activities associated with the Project will build upon these existing arrangements throughout implementation of the 2026-2027 investment programme.

The stakeholder engagement activities currently planned for the 2026-2027 period are summarised in Table 6.1.

Table 6.1: Planned Stakeholder Engagement Activities (2026-2027)

Stakeholder Group	Planned Stakeholder Engagement Activities
Government authorities, governorships and district governorates	Coordination meetings, consultations, notifications and liaison activities relating to investment planning, public services, emergency preparedness and infrastructure development.
Municipalities and metropolitan municipalities	Regular coordination meetings regarding public lighting investments, excavation permits, infrastructure coordination, traffic management requirements and planned electricity distribution investments.
Muhtars and local community representatives	Meetings, site visits and consultation activities regarding planned works, outages, maintenance activities and community concerns. The Muhtar WhatsApp Support Line will continue to be used as a dedicated communication channel for notifying local representatives of planned outages, maintenance activities and issues relating to electricity infrastructure.
Regulators and public institutions	Engagement with TEDAŞ, TEİAŞ, AFAD, TOKİ, BOTAŞ, DSİ and other relevant institutions regarding investment activities, infrastructure coordination and emergency preparedness arrangements.
Customers	Existing customer communication channels, including customer service centres, customer contact centres, Mobile 186, SMS notifications and digital platforms, will continue to be used to communicate planned outages, service interruptions, network improvements and customer-related matters.
Communities and vulnerable stakeholders	Community awareness programmes relating to electrical safety and energy efficiency are expected to continue throughout the Project implementation period. Additional package-specific communications and consultation activities will be undertaken where investment packages have the potential to affect local communities or vulnerable stakeholders.

Stakeholder Group	Planned Stakeholder Engagement Activities
Landowners and land users	Direct consultation regarding transmission-line developments, easements, land access requirements, compensation arrangements and associated stakeholder concerns where applicable.
Contractors and suppliers	Contractor management meetings, audits, inspections, occupational health and safety meetings and implementation coordination activities.
Professional organisations and technical bodies	Engagement with professional organisations and technical institutions regarding technical matters, customer connections and information exchange activities.
EBRD and other lenders	Environmental and social monitoring meetings, Project implementation updates and information sharing in accordance with applicable financing requirements.

In addition to investment-related stakeholder engagement activities, Enerjisa will continue to implement broader stakeholder engagement initiatives through its sustainability reporting processes, community investment programmes, educational partnerships and electricity safety awareness activities across its distribution regions where relevant to the Project.

6.3 INFORMATION DISCLOSURE

Information disclosure activities will use Enerjisa's existing communication channels wherever practicable and will be proportionate to the characteristics of the relevant investment package. Indicative information disclosure arrangements are presented in Table 6.2.

Table 6.2: Indicative Information Disclosure Arrangements

Topic	Typical Disclosure Approach
Planned outages and service interruptions	SMS notifications, customer communication channels, Mobile 186 and operational notifications.
Planned works and temporary disruptions	Direct stakeholder notifications and local communications where required.
Traffic and access disruptions	Coordination with municipalities and notifications to affected stakeholders where appropriate.
Land acquisition, easements and land access requirements	Direct consultation and written communications with affected landowners and land users.
Community health and safety matters	Community notifications and targeted stakeholder communications where required.
Project grievance mechanism	Disclosure through corporate websites, stakeholder communications and existing customer engagement channels.
Project information and financing-related disclosures	Disclosure in accordance with applicable lender requirements and corporate disclosure arrangements.
Investment package-specific information	Package-specific disclosure measures proportionate to the characteristics and potential impacts of the investment package.

Additional information disclosure activities may be undertaken where investment packages involve potentially affected communities, vulnerable stakeholders or elevated stakeholder sensitivities.

6.4 ADDITIONAL STAKEHOLDER ENGAGEMENT MEASURES

For the majority of investment packages, existing corporate stakeholder engagement arrangements and communication channels are expected to provide an appropriate level of stakeholder engagement. Where the stakeholder engagement requirements assessment identifies the need for additional stakeholder engagement measures, these will be proportionate to the characteristics and potential impacts of the relevant investment package.

Examples of additional stakeholder engagement measures that may be implemented are presented in Table 6.3.

Table 6.3: Examples of indicative stakeholder engagement approaches for different investment categories

Investment Characteristics	Typical Additional Stakeholder Engagement Measures
Routine investment activities with limited stakeholder impacts	Existing corporate communication channels and grievance mechanisms are utilised.
Investment packages involving temporary community impacts, planned outages or traffic disruptions	Targeted stakeholder notifications and engagement with municipalities, mukhtars and affected customers where appropriate.
Investment packages involving land acquisition, easements or land access requirements	Direct engagement and consultation with affected landowners and land users.
Investment packages involving potentially affected communities or vulnerable stakeholders	Targeted information disclosure and consultation activities appropriate to stakeholder needs.
Investment packages involving elevated stakeholder interest or potentially significant environmental or social impacts	Enhanced stakeholder engagement measures, including package-specific consultation and information disclosure activities where required.

Engagement methods may include meetings, consultations, site visits, written notifications, community information sessions and direct communications appropriate to the relevant stakeholder group. Where necessary, stakeholder engagement activities will be adapted to facilitate the participation of vulnerable and disadvantaged stakeholders.

6.5 DOCUMENTATION AND RECORD KEEPING

Stakeholder engagement and information disclosure activities undertaken under the Project will be documented through Enerjisa's existing stakeholder engagement planning, grievance management and reporting systems.

Records may include stakeholder communications, consultation records, grievance records and annual stakeholder engagement reporting documentation.

As the financing facility is structured as a corporate finance transaction, stakeholder engagement and grievance-management activities will continue to be implemented, monitored and reported through Enerjisa's established corporate and subsidiary-level systems. Grievances relating to the activities of Enerjisa's distribution companies will be recorded, monitored and reported through existing company-wide processes, including annual stakeholder engagement and grievance reporting arrangements. Assessment of stakeholder concerns and grievance trends associated with the Project will therefore be based on these consolidated records.

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7 PROJECT GRIEVANCE MECHANISM

7.1 EXTERNAL GRIEVANCE MECHANISM

Enerjisa has established mechanisms through which stakeholders may submit requests, suggestions, complaints, grievances and enquiries regarding its activities and operations. The Project will utilise these existing mechanisms as the primary means for receiving, recording and managing Project-related grievances.

For the purposes of the Enerjisa Distribution Investments Project, grievances associated with Project-financed investment activities will be identified and tracked separately within existing systems to facilitate Project monitoring and reporting.

Stakeholders may submit requests, suggestions, complaints and grievances through the channels set out in Table 7.1.

Table 7.1: External Grievance Submission Channels

Communication Channel	Contact Details / Description
Customer Service Centres and Transaction Centres	In-person submission of requests, suggestions, complaints and grievances
Customer Contact Centre	444 4 372
Online Application Channels	https://online.enerjisa.com.tr/anasayfa/talepve-onerilerim https://www.ayedas.com.tr/iletisim https://www.baskentedas.com.tr/iletisim https://www.toroslaredas.com.tr/iletisim
Corporate Website	www.enerjisa.com.tr www.ayedas.com.tr www.baskentedas.com.tr www.toroslaredas.com.tr
E-mail	musteriiliskileri@enerjisa.com
Enerjisa Mobile Application	Customer requests, suggestions and complaints
Distribution Service Line	186
Mobile 186 Application	Distribution-related requests and complaints
Social Media Accounts	Twitter/X, Instagram, Facebook and other corporate channels
Distribution Company Websites	Relevant distribution company websites
Government Open Door Applications	Written grievances received through public authorities
Written Petitions and Correspondence	Postal or hand-delivered submissions
Enerjisa Operations Centres	Direct submission of operational concerns
WhatsApp Customer Support Line	Existing customer support arrangements
WhatsApp Muhtar Support Line	Dedicated communication channel for mukhtars
Chatbot Services	Existing digital communication channels

The Internal Audit Department, Ethics and Inspection Office independently reviews notifications received through ENETİK and reports outcomes through established corporate governance processes. Complaints are managed in accordance with Enerjisa's existing ethics, compliance and investigation procedures

Workforce grievances relating to employment conditions, workplace concerns, health and safety matters, contractor management or other labour-related issues may also be raised through existing company and human resources procedures.

7.2 MANAGEMENT OF SENSITIVE GRIEVANCES

Certain grievances require a different management approach due to their sensitive nature. These may include allegations relating to:

- ✓ Sexual exploitation and abuse (SEA)/ sexual harassment (SH)/ gender-based violence and harassment (GBVH);
- ✓ Discrimination;
- ✓ Child protection concerns;
- ✓ Fraud and corruption;
- ✓ Human rights concerns;
- ✓ Unethical conduct; and
- ✓ Other serious misconduct.

Such allegations will not be managed through routine grievance resolution processes. Instead, they will be referred through Enerjisa's established confidential reporting, ethics, compliance and investigation procedures, including the ENETİK reporting channels where appropriate, to ensure appropriate handling, confidentiality, protection from retaliation and management oversight. Sensitive grievances may also be reported through designated channels including the Compliance Department, People and Culture Department and other approved reporting mechanisms.

Sensitive grievances will only be disclosed to personnel with a legitimate need to know and will be managed in accordance with applicable legal requirements and corporate procedures. The identity of complainants, witnesses and individuals participating in investigations will be protected to the extent permitted by law and Company procedures, and information will be shared only with authorised personnel involved in the assessment and resolution of the matter.

Where allegations relate to fraud, corruption, unethical conduct, discrimination, human rights concerns or other serious misconduct, complainants may utilise Enerjisa's existing ethics reporting channels, including the ENETİK reporting system. Notifications received through these channels will be reviewed and investigated through the Company's established ethics, compliance and internal investigation processes.

Where allegations involve contractor personnel, contractors will be required to notify Enerjisa promptly and cooperate fully with any investigation while maintaining appropriate confidentiality protections. Findings and corrective actions will be managed in accordance with applicable contractual requirements and Company procedures.

Enerjisa applies a non-retaliation approach to sensitive grievance management. Individuals raising concerns in good faith, participating in investigations or supporting grievance-resolution processes will be protected from retaliation, intimidation, discrimination, harassment or other adverse treatment. Where appropriate, protective measures may be implemented during investigations to safeguard affected individuals and ensure the integrity of the reporting process.

Complaints relating to SEA/ SH/GBVH will be managed using a survivor-centred approach that prioritises:

- ✓ Confidentiality;
- ✓ Safety;
- ✓ Dignity;
- ✓ Respect;
- ✓ Non-discrimination; and
- ✓ Protection from retaliation.

Individuals raising such concerns will not be required to provide information beyond that necessary to facilitate appropriate support and investigation. Where appropriate, and subject to the wishes of the affected individual, information regarding available support services and referral pathways will be provided.

All sensitive grievances will be recorded and monitored in a manner that protects confidentiality and privacy. Where reporting is required for Project monitoring purposes, information will be presented only in aggregated form and will not include information that could identify individual complainants. Trends, corrective actions and lessons learned may be reviewed through Enerjisa's established ethics and compliance processes to support continual improvement while maintaining appropriate confidentiality protections.

7.3 GRIEVANCE MANAGEMENT PROCESS

All requests, suggestions, enquiries, complaints and grievances submitted through the channels identified in Section 8.1 will be recorded, assessed and managed through Enerjisa's existing grievance-management systems.

The grievance-management process applicable to the Project is summarised in Table 7.2.

Table 7.2: Grievance Management Process

Step	Activity
1	Receipt of grievance, complaint, request or enquiry
2	Registration and screening, including identification of any sensitive grievances requiring specialised handling
3	Acknowledgement of receipt, where appropriate
4	Assessment and assignment of responsibility
5	Investigation and development of corrective or resolution measures
6	Communication of response and proposed resolution
7	Implementation of corrective actions where required
8	Closure and documentation of outcome
9	Escalation through appropriate corporate procedures where required

Grievances will be recorded and managed through Enerjisa's existing grievance-management systems and procedures. Sensitive grievances will continue to be managed through Enerjisa's confidential corporate procedures and ethics-reporting mechanisms where applicable.

As the financing facility is structured as a corporate finance transaction, grievances relating to the activities of Enerjisa's distribution companies will continue to be monitored, analysed and reported through existing company-wide grievance-management and stakeholder reporting processes. Stakeholder grievances and grievance trends will be assessed through its consolidated annual monitoring and reporting arrangements, including annual stakeholder engagement and grievance reporting processes. Assessment of recurring issues, stakeholder concerns and grievance trends relevant to Project activities will therefore be based on these consolidated records.

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7.4 WORKFORCE GRIEVANCE MECHANISM

Employees and contractor workers engaged in Project activities will continue to have access to Enerjisa's existing workforce grievance and ethics-reporting mechanisms. Workforce grievances will be managed in accordance with applicable company procedures, labour-management arrangements and relevant legal requirements.

Existing mechanisms include:

- ✓ Line-management reporting channels;
- ✓ Human Resources procedures;
- ✓ ENETİK reporting channels;

- ✓ Ethics hotline and ethics reporting mechanisms;
- ✓ Internal reporting applications and platforms; and
- ✓ Other established workforce communication channels.

Workforce grievances are managed separately from the external stakeholder grievance mechanism described in this SEP.

7.5 MONITORING AND REPORTING OF GRIEVANCES

Project-related grievances will be recorded and monitored through Enerjisa's existing grievance-management systems.

Monitoring information may include:

- ✓ Number of grievances received;
- ✓ Stakeholder category;
- ✓ Grievance topic;
- ✓ Status of grievances;
- ✓ Corrective actions implemented;
- ✓ Grievances resolved; and
- ✓ Recurring stakeholder concerns.

Summary information regarding Project-related grievances will be included in Project monitoring and reporting activities.

8 ROLES AND RESPONSIBILITIES

8.1 OVERVIEW OF ROLES AND RESPONSIBILITIES

Implementation of this SEP will be integrated into Enerjisa's existing organisational structures, stakeholder engagement arrangements and operational processes. Responsibility for stakeholder engagement is shared across the relevant Project, environmental and social, customer relations and operational teams.

Table 8.1 summarises the main responsibilities for implementation of this SEP.

Table 8.1: Roles and Responsibilities

Role	Key Responsibilities
Enerjisa Sustainability and Corporate Capabilities	Oversight of SEP implementation, monitoring compliance with lender requirements and environmental and social reporting obligations.
Project Management Team and Distribution Companies	Implementation of stakeholder engagement activities associated with Project-financed investments and coordination of any project-specific stakeholder engagement requirements identified during investment package planning.
Customer Relations and Customer Service Functions	Management of existing stakeholder communication channels, customer enquiries and information disclosure activities.
Distribution Companies (AYEDAŞ, Başkent EDAŞ and Toroslar EDAŞ)	Implementation of stakeholder engagement activities within their respective licence areas; engagement with municipalities, regulators, customers, muhtars and communities; and support for Project implementation activities.
Land and Permitting Teams	Management of land-related stakeholder engagement activities, including engagement with affected landowners and land users where required, in accordance with applicable company procedures.
Contractors and Subcontractors	Compliance with applicable stakeholder engagement, community health and safety and grievance management requirements associated with their activities.

8.2 CONTRACTOR RESPONSIBILITIES

Contractors undertaking work on behalf of the Project will be required to comply with applicable stakeholder engagement, community health and safety and grievance management requirements established by Enerjisa.

Contractors may support stakeholder engagement activities associated with planned works and temporary construction impacts where required. Stakeholder complaints and grievances associated with Project activities will be managed through Enerjisa's established grievance-management arrangements unless otherwise specified by Enerjisa.

8.3 LANDOWNER AND COMMUNITY ENGAGEMENT

Where investment packages involve land acquisition, easements or land-access requirements, additional stakeholder engagement activities may be required. Such activities will be undertaken in accordance with the requirements of this SEP and Enerjisa's applicable land acquisition and permitting procedures.

Depending on the characteristics of the investment package, stakeholder engagement activities may include:

- ✓ Disclosure of Project information;
- ✓ Consultation with affected landowners and land users;
- ✓ Discussions regarding land access, easements and compensation arrangements where applicable;
- ✓ Engagement with relevant public authorities and municipalities; and
- ✓ Ongoing communication throughout implementation of land-related processes.

Additional stakeholder engagement activities may also be implemented where investment packages have the potential to affect local communities or involve elevated stakeholder sensitivities and in agreement with the government authorities.

8.4 RESOURCES

Stakeholder engagement activities associated with the Project will be implemented through Enerjisa's existing organisational structures, communication systems and stakeholder engagement arrangements. Resources required for implementation of this SEP, including stakeholder engagement, information disclosure, grievance management, monitoring and reporting activities, will be provided through existing operational and Project management budgets.

Where investment packages require enhanced stakeholder engagement activities, including land-related consultations or targeted community engagement measures, additional resources will be allocated as necessary to ensure the requirements of this SEP are implemented.

9 MONITORING, REPORTING AND REVIEW

9.1 MONITORING

Stakeholder engagement activities undertaken under the Project will be monitored through Enerjisa's existing stakeholder engagement, grievance management and Project reporting processes. Monitoring information will be collected through: stakeholder engagement and information-disclosure records, grievance-management records, contractor monitoring activities and other Project implementation records. Monitoring activities may include consideration of:

- ✓ Stakeholder engagement activities undertaken;
- ✓ Stakeholder feedback and concerns raised;
- ✓ Information disclosure activities completed;
- ✓ Project-related grievances and their resolution;
- ✓ Implementation of any project-specific stakeholder engagement measures; and
- ✓ Lessons learned during Project implementation.

Information generated through stakeholder engagement activities will be used to identify opportunities for improvement and inform updates to stakeholder engagement arrangements where necessary.

Monitoring indicators are presented in Table 9.1 .

Table 9.1: Stakeholder Engagement Monitoring Indicators

Indicator	Performance Measure	Monitoring Frequency	Responsibility	Means of Verification
Stakeholder engagement activities completed	Number and type of stakeholder engagement activities implemented	Quarterly	Sustainability and Corporate Capabilities Department / Project Manager	Stakeholder engagement records
Stakeholders engaged	Number and category of stakeholders engaged, including vulnerable stakeholders where applicable	Quarterly	Project Manager	Stakeholder registers, consultation records
Information disclosure	Information disclosed in accordance with this SEP	Quarterly	Communications Function	Disclosure records, website records, correspondence
Grievances received	Number and type of Project-related grievances received	Quarterly	Sustainability and Corporate Capabilities Department	Grievance records
Grievance status	Status of grievances, including open and closed grievances and implementation of corrective actions where applicable	Quarterly	Sustainability and Corporate Capabilities Department	Grievance records
Sensitive grievances	Number of sensitive grievances managed through confidential procedures (reported only in aggregated form)	Quarterly	Sustainability and Corporate Capabilities Department	Confidential reporting systems
Stakeholder feedback	Significant stakeholder concerns, recommendations and	Quarterly	Project Manager	Consultation records and action trackers

Indicator	Performance Measure	Monitoring Frequency	Responsibility	Means of Verification
	actions taken where appropriate			
SEP implementation	Implementation status of stakeholder engagement commitments contained in this SEP	Annually	Sustainability and Corporate Capabilities Department	Internal monitoring reports
SEP review	Completion of annual SEP review and identification of required updates	Annually	Sustainability and Corporate Capabilities Department	SEP review records

Sensitive grievances will be reported only in aggregated form and in a manner that protects confidentiality and personal privacy.

9.2 REPORTING

Stakeholder engagement activities associated with the Project will be documented through Enerjisa's existing management systems and reporting processes. Information relating to stakeholder engagement may be incorporated into:

- ✓ Project monitoring reports;
- ✓ Environmental and social monitoring reports;
- ✓ Annual sustainability reporting processes;
- ✓ Lender reporting requirements; and
- ✓ Internal management reporting processes.

Where required, stakeholder engagement information will be reported to EBRD in accordance with applicable financing agreements and environmental and social reporting requirements.

Reporting may include stakeholder engagement activities undertaken, significant stakeholder concerns raised, grievances received and resolved, and any additional stakeholder engagement measures implemented during Project implementation.

9.3 SEP REVIEW AND UPDATE

This SEP is a living document and will be reviewed at least annually throughout implementation of the Project. Reviews will consider:

- ✓ Changes to the Project portfolio or investment programme;
- ✓ Stakeholder feedback and grievance trends;
- ✓ Lessons learned from Project implementation;
- ✓ Monitoring and reporting information;
- ✓ Changes in applicable legal, regulatory or lender requirements; and
- ✓ Any changes to stakeholder engagement arrangements or communication channels.

Where necessary, the SEP will be updated to reflect changes in Project activities, stakeholder engagement requirements or lender requirements. Updated versions of the SEP will be disclosed in accordance with the information disclosure provisions of this document.

10 REFERENCES

This Stakeholder Engagement Plan has been prepared with reference to:

- ✓ European Bank for Reconstruction and Development (EBRD). *Environmental and Social Policy (2024);*
- ✓ EBRD Environmental and Social Requirement 10 – *Information Disclosure and Stakeholder Engagement;*
- ✓ Applicable environmental and social legislation of the Republic of Türkiye;
- ✓ Enerjisa Corporate Stakeholder Engagement Strategy/Guidance;
- ✓ Enerjisa Land Acquisition Procedure (where applicable);
- ✓ Enerjisa stakeholder engagement, customer communication and sustainability documentation, including annual stakeholder engagement workplans prepared by the distribution companies; and
- ✓ Terms of Reference for the Environmental and Social Due Diligence.

Annex A:
Stakeholder Register and Closure Form

ANNEX A – PROJECT-LEVEL STAKEHOLDER REGISTER (TEMPLATE)

Stakeholder Category	Stakeholder Name/Organisation	Interest in Project	Potential Impact	Influence	Engagement Method	Frequency	Responsible Person

Annex B:
Stakeholder Engagement Screening Checklist

Annex B - Stakeholder Engagement Screening Checklist

Question	Yes	No
Is the investment located within an existing operational site?		
Will construction occur adjacent to residential properties?		
Will planned power outages be required?		
Will temporary traffic management be required?		
Are vulnerable groups likely to be affected?		
Is land acquisition required?		
Is enhanced consultation required?		
Is a package-specific SEP required?		