YELLİCE WIND POWER PLANT PROJECT

STAKEHOLDER ENGAGEMENT PLAN

Document History

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Yellice Enerji Üretim A.Ş.
İçerenköy Mah. Destan Sok. Efor Plaza No:6
İç Kapı No:16 Ataşehir / İstanbul / Türkiye
T: +90 0850 275 0 746 / +90 0216 252 0 746 / info@eforholding.com

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Yellice Enerji Üretim A.Ş.
İçerenköy Mah. Destan Sok. Efor Plaza No:6
İç Kapı No:16 Ataşehir / İstanbul / Türkiye
T: +90 0850 275 0 746 / +90 0216 252 0 746 / info@eforholding.com

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DEFINITIONS

Grievance Mechanism: The International Finance Corporation ("IFC") Good Practice Note: Addressing Grievances from Project-Affected Communities (September 2009) defines a grievance as a concern or complaint raised by an individual or a group within communities affected by Company operations. Both concerns and complaints can result from either real or perceived impacts of a Company's operations and may be filed in the same manner and handled with the same procedure. The difference between responses to a concern or a complaint may be in the specific approaches and the amount of time needed to resolve it.

Project Affected People: Project affected people refer to the individuals and communities likely to be subject to the environmental and social impacts caused by the Project.

Stakeholder: Stakeholders are persons or groups who are directly or indirectly affected by a Project, as well as those who may have interests in a Project and the ability to influence its outcome, either positively or negatively. Stakeholders may include locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organisations and groups with special interests, the academic community, or other businesses.

Public Consultation: As referred to in this Good Practice Manual, public consultation is a tool for managing two-way communication between the Project sponsor and the public. Its goal is to improve decision-making and build understanding by actively involving individuals, groups, and organisations with a stake in the Project. This involvement will increase a Project's long-term viability and benefit locally affected people and other stakeholders.

Stakeholder Engagement Plan: Stakeholder Engagement Plan ("SEP") is a guidance for stakeholder consultations and communications for projects. SEP is a living document should be updated to provide a roadmap for engagement in monitoring the effectiveness of impact mitigation measures.

Vulnerable Groups: Vulnerability status may stem from an individual's or group's race, colour, sex, language, religion, political or other opinions, national or social origin, property, birth, or status. The client should also consider gender, age, ethnicity, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

ABBREVIATIONS

the Project	Yellice Wind Power Plant Project
Client or Yellice Enerji	Yellice Enerji A.Ş.
WSP Türkiye or WSP	WSP Danışmanlık ve Mühendislik Ltd. Şti.
AoI	Area of Influence
CIMER	Presidential Communication Centre (Cumhurbaşkanlığı İletişim Merkezi)
CLO	Community Liaison Officer
EIA	Environmental Impact Assessment
EMRA	Energy Market Regulatory Authority
EPC	Engineering, Procurement and Construction
EPFI	Equator Principles Financial Institutions
EPs	Equator Principles
E&S	Environmental and Social
ESAP	Environmental and Social Action Plan
ESDD	Environmental and Social Due Diligence
ESMS	Environmental and Social Management System
ETL	Energy Transmission Line
GBVH	Gender-Based Violence and Harassment
GM	Grievance Mechanism
IFC	International Finance Corporation
KPIs	Key Performance Indicators
LRP	Livelihood Restoration Plan
MoAF	Ministry of Agriculture and Forestry
MoCT	Ministry of Culture and Tourism
MoENR	Ministry of Energy and Natural Resources
MoEUCC	Ministry of Environment, Urbanization and Climate Change
MoFSS	Ministry of Family and Social Services
MoND	Ministry of National Defence
MoI	Ministry of Interior
MoTI	Ministry of Transport and Infrastructure
NGOs	Non-governmental organisations

NTS	Non-Technical Summary
PAPs	Project Affected Persons
PPM	Public Information and Participation Meeting
PSs	Performance Standards
SEP	Stakeholder Engagement Plan
TEİAŞ	Turkish Electricity Transmission Corporation
TMMOB	Union Chambers of Turkish Engineers and Architects
TOBB	Union of Chambers and Commodity Exchanges of Türkiye
WPP	Wind Power Plant
YEKA	Renewable Energy Resource Zone

1. INTRODUCTION

This Stakeholder Engagement Plan ("SEP") is prepared for the Yellice Wind Power Plant ("WPP") Project (here in after referred as "the Project") by WSP Danışmanlık ve Mühendislik Ltd. Şti. (herein after "WSP") on behalf of Yellice Enerji Üretim A.Ş. (here in after referred as "Yellice Enerji" or "Client") for implementing the Project in compliance with the national and international requirements.

Yellice Enerji is currently implementing the construction of the Yellice WPP and is planning to operate the Project upon completion. The Project is located in the Kangal and Gürün districts of Sivas Province and covers a total area of 870.23 hectares. It will consist of 23 wind turbines with a total installed capacity of 160 MWm / 160 MWe, comprising 21 turbines each with a capacity of 7 MWe, one turbine with a capacity of 6.8 MWe, and one turbine with a capacity of 6.2 MWe.

This SEP is developed to enable all processes of interaction with stakeholders who are directly or indirectly affected by the Project or who are interested in the Project's outcomes. During the execution of the Project, SEP will be implemented in accordance with the requirements of Turkish national laws/regulations, International Finance Corporation ("IFC") Performance Standards ("PSs") and Equator Principles ("EPs") on Social and Environmental Sustainability.

This SEP identifies the Project stakeholders, target groups and the specific engagement activities required for each group of stakeholders of the Project. The SEP is a living document and will be continuously updated to reflect any changes or developments throughout the lifecycle of the Project.

The Project will be committed to the following principles based on the international best practices to obtain effective stakeholder engagement as:

- Commitment to understand, engage and identify the community at the early stages of the Project,
- Transparency in community concerns and respond in a timely, open, and effective manner,
- Integrity in a way that encourages mutual respect and trust,
- Respect the rights, cultural beliefs, values, and interests of stakeholders and affected communities,
- Ensuring equal participation in all stakeholder engagement processes with a gender-sensitive approach, and,
- Establishing an inclusive engagement process by ensuring the meaningful participation of vulnerable groups in the Project affected settlements,
- Establishment of a Project-specific grievance mechanism (both internal and external) to ensure a technically and culturally appropriate approach for engagement with all stakeholders.

1.1. Purpose of the Stakeholder Engagement Plan

A project-specific SEP is a strategic tool to manage relationships, address concerns, and ensure stakeholders are appropriately involved and informed for the project. The purpose of this SEP is to

ensure that Project stakeholders, including Project Affected People ("PAPs") and other interested stakeholders, receive timely, consistent, comprehensive, relevant, accessible and transparent information about the Project. The SEP ensures a participatory approach, and the implementation of the SEP is intended to solicit opinions and concerns about the project and its impacts.

The primary objectives of this document are to:

- Identify stakeholders,
- Define processes for informing stakeholders about the Project,
- Conduct current stakeholder engagement activities and describe planned future stakeholder engagement activities,
- Set up a grievance mechanism, including a process for addressing feedback and concerns,
- Define Project commitments, and procedures relevant to this Plan,
- Describe roles and responsibilities related to engagement activities,
- Define training requirements; and,
- Establish a framework for monitoring engagement activities.

1.2. Scope of the Stakeholder Engagement Plan

This Plan applies to all Project-related activities, including those of associated facilities and all contractors, during both the construction and operation phases. Once approved by Yellice Enerji, all contractors shall comply with the requirements and standards set out in this Plan.

2. PROJECT DESCRIPTION

2.1. Project Overview

The Yellice WPP is a renewable energy Project initiated by Yellice Enerji Üretim A.Ş., a subsidiary of Efor Holding A.Ş. The Project Area is located in the Kangal and Gürün districts of Sivas Province, covering a total area of 870.23 hectares and is designed to utilize wind energy for electricity generation. The Project is within an area designated as a Renewable Energy Resource Zone ("YEKA") by the Ministry of Energy and Natural Resources ("MoENR"). The Project location is shown in Figure 1. The Project layout with nearest settlements is presented in Figure 2.

The Project has been granted a preliminary license by the Energy Market Regulatory Authority ("EMRA") on April 10, 2025, under license number ÖN/13444-4/06430, authorizing the commencement of investment activities. The Project will consist of 23 wind turbines with a total installed capacity of 160 MWm / 160 MWe, including 21 turbines with 7 Mwe capacity for each, one turbine with 6.8 Mwe capacity, and one turbine with 6.2 Mwe capacity.

The Project will be connected to the Kangal Transformer Station - Hasan Çelebi Transmission Line and national grid via an overhead Energy Transmission Line ("ETL") 154 kV with a length of 5+5 km, ensuring reliable and efficient energy transmission. EIA exemption letter dated 22.10.2025 for ETL was shared by Yellice Enerji.

The construction of the ETL within the scope of the Project is under the responsibility of Yellice Enerji, and following the completion of construction, the ETL will be transferred to Turkish Electricity Transmission Corporation ("TEİAŞ") for the purpose of operation and maintenance. As the ETL will be under the management of TEİAŞ, all land acquisition processes and compensation activities fall under the responsibility of TEİAŞ. In this context, Yellice Enerji is not responsible for land acquisition activities and will only act in a monitoring and follow-up capacity for this process.

An EIA Report for the Project was prepared by Çınar Engineering in accordance with the national EIA Regulation published in the Official Gazette on July 29, 2022 (Issue No. 31907). The Ministry of Environment, Urbanization, and Climate Change ("MoEUCC") issued an EIA Positive Decision on January 4, 2024 (Decision No. 7472).

Due to revisions in the number of turbines and their capacities in the Project, the validity of the EIA Decision has been confirmed by the MoEUCC by the Official Letter numbered E-48331039-220.01-12645403 and dated 18 June 2025, based on the updated turbine numbers and capacities.

The Project area includes private lands, treasury lands, and pasturelands. In total, 87 parcels are identified within the scope of the WPP Project while additional 17 parcels were identified for ETL Route. The closest residence to the turbines is located in Mescit Village, approximately 750 meters away.

Regarding access to the Project Area, it is provided from existing village roads that connect to Sivas - Malatya Provincial Road. As part of the Project, some extension and improvement works will be performed on these village roads. Additionally, approximately 7 km long in-site roads (turbine access roads) will be constructed within the scope of the Project.

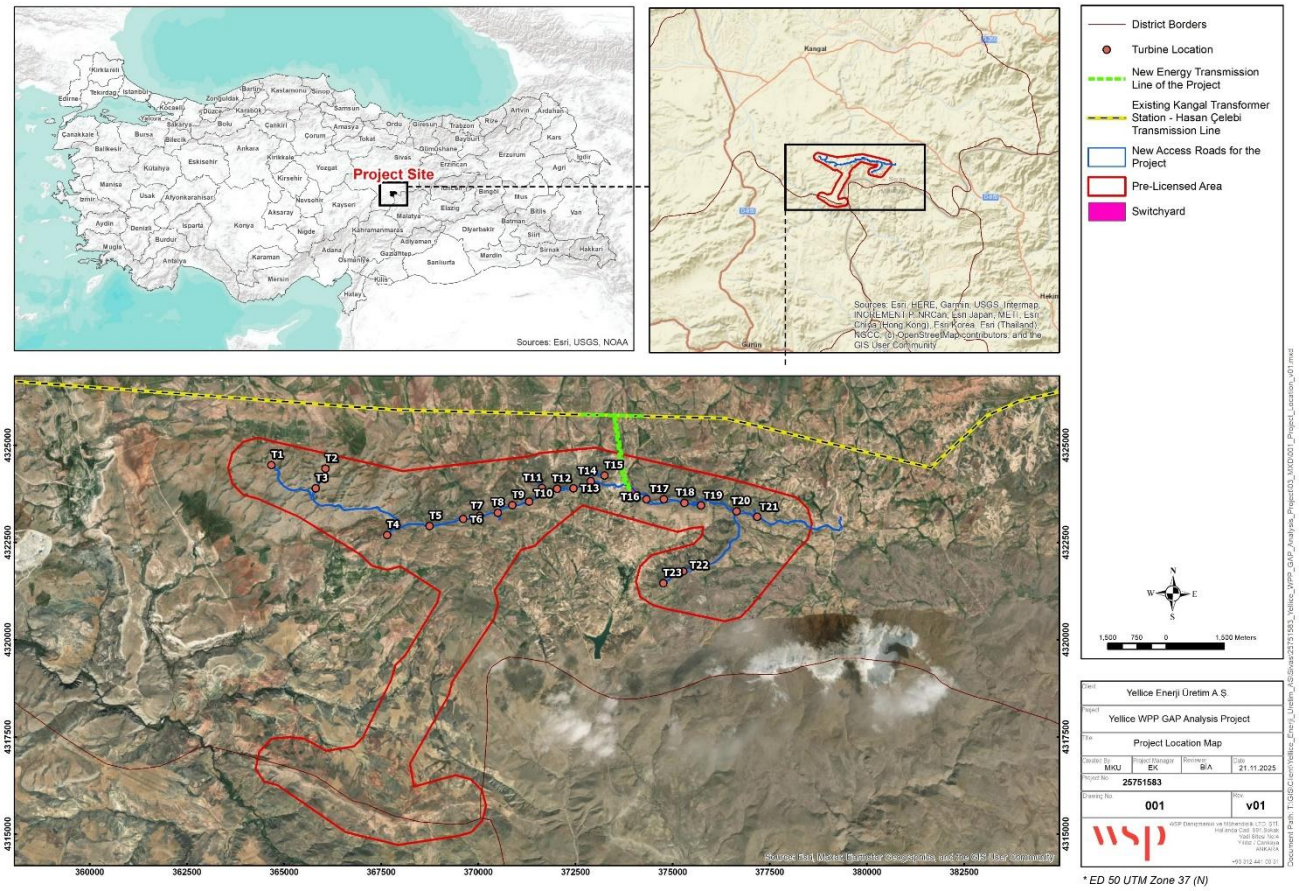


Figure 1: Project Layout

Yellice Enerji Üretim A.Ş.
İçerenköy Mah. Destan Sok. Efor Plaza No:6
İç Kapı No:16 Ataşehir / İstanbul / Türkiye
T: +90 0850 275 0 746 / +90 0216 252 0 746 / info@eforholding.com

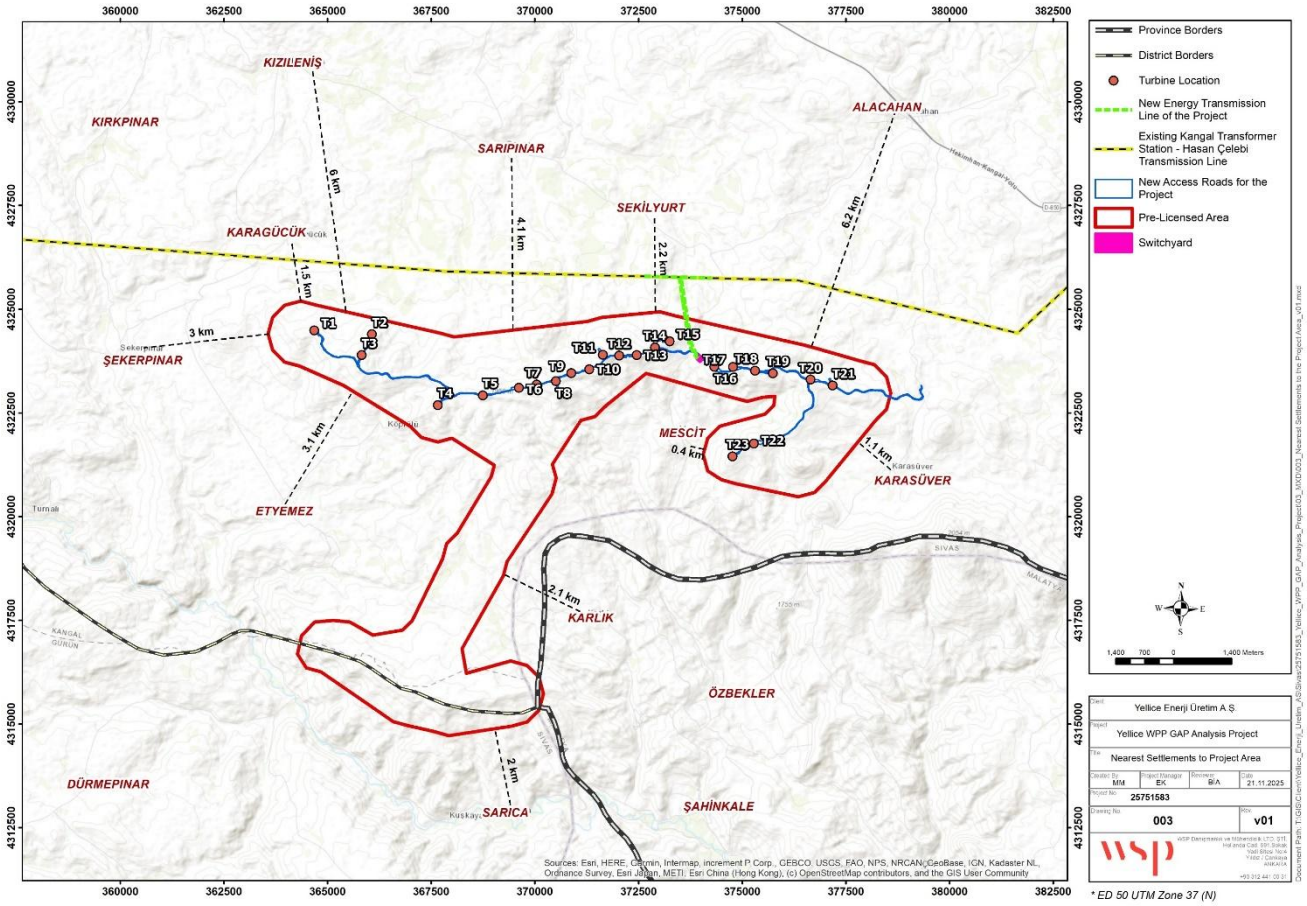


Figure 2: Project Layout with Nearest Settlements

2.2. Project Schedule

Within the scope of the Project, the construction phase is estimated as 17 months, while the economic lifetime of the Project is estimated as 49 years. Electrical and electromechanical works will be carried out simultaneously with the installation of the turbines. After that, operational tests will be carried out and the Project will become operational.

2.3. Area of Influence

The Area of Influence ("AoI") of the Project is the area in which a direct or indirect impact on the biological, physical, and social components might occur.

As defined by IFC PS1, the Area of Influence encompasses:

- The area likely to be affected by: (i) the project and the client's activities and facilities that are directly owned, operated or managed (including by contractors) and that are a component of the project (ii) impacts from unplanned but predictable developments caused by the project that may occur later or at a different location; or (iii) indirect project impacts on biodiversity or on ecosystem services upon which Affected Communities' livelihoods are dependent.

- Associated facilities, which are facilities that are not funded as part of the Project and that would not have been constructed or expanded if the Project did not exist and without which the Project would not be viable.
- Cumulative impacts that result from the incremental impact, on areas or resources used or directly impacted by the Project, from other existing, planned or reasonably defined developments at the time the risks and impacts identification process is conducted.

The settlements that are included in the AoI of the Project and their distances to the nearest turbines are presented in Table 1.

Table 1: Nearest Settlements and Their Distances to the Nearest Turbines

Province	District	Village	Nearest Turbine	Distance to the Nearest Turbine (km)
Sivas	Kangal	Etyemez	T4	1.24
Sivas	Kangal	Karagücük	T1	1.94
Sivas	Kangal	Mescit	T23	0.66
Sivas	Kangal	Karasüver	T21	2.38
Sivas	Kangal	Alacahan	T21	5.86
Sivas	Kangal	Kızıleniş	T1	6.14
Sivas	Kangal	Sarıpınar	T11	4.96

3. REGULATORY REQUIREMENTS

3.1. Turkish Requirements for Stakeholder Engagement and Public Consultation

3.1.1. The Constitution of The Republic of Türkiye

"The Constitution of the Republic of Türkiye" is the main document related to the stakeholder engagement component of the Project. The articles of the Constitution related to engagement issues are listed below.

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VII. Freedom of Thought and Opinion

ARTICLE 25. Everyone has the right to freedom of thought and opinion. No one shall be compelled to reveal their thoughts and opinions for any reason or purpose, nor shall anyone be blamed or accused on account of their thoughts and opinions.

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VIII. Freedom of Expression and Dissemination of Thought

ARTICLE 26. Everyone has the right to express and disseminate his thoughts and opinion by speech, in writing or pictures or through other media, individually or collectively. This right includes the freedom to receive and impart information and ideas without interference from official authorities.

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VIII. Health, the Environment and Housing

A. Health Services and Conservation of the Environment

ARTICLE 56. Everyone has the right to live in a healthy, balanced environment. It is the duty of the state and citizens to improve the natural environment and to prevent environmental pollution.

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - XI. Conservation of Historical, Cultural and Natural Wealth

ARTICLE 63. The state shall ensure the conservation of the historical, cultural, and natural assets and wealth and take supportive and promotive measures towards that end.

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VII. Right of Petition

ARTICLE 74. Citizens and foreign residents considering the principle of reciprocity have the right to apply in writing to the competent authorities and the Turkish Grand National Assembly about the requests and complaints concerning themselves or the public.

3.1.2. Other main national laws/regulations

In addition to the Constitution, the following national laws and regulations are relevant to stakeholder engagement activities under the Project.

I. Turkish Civil Code

Property ownership, land tenure and real property rights are regulated under the Turkish Civil Code No. 4721 (Official Gazette No. 24607, dated 08.12.2001). Provisions of the Civil Code shall be respected throughout all phases of the Project, particularly in relation to land ownership, usage rights and interactions with landowners and land users.

II. Law on the Right to Information

Law on the Right to Information No. 4982 Official Gazette No. 25269, dated 24.10.2003) regulates the procedure and the basis of the right to information according to the principles of equality, impartiality and openness that are the necessities of a democratic and transparent government. Everyone has the right to information on the activities of public institutions and professional organisations, which qualify as public institutions.

III. Law on the Use of Right to Petition

Turkish citizens have the right to apply in writing to the Turkish Grand National Assembly and the component authorities about the requests and complaints concerning themselves or the public according to Article 3 of the Law on the Use of Right to Petition No. 4982 (Issued on 01.11.1984, Official Gazette No. 3071). Foreign residents have this right considering the principle of reciprocity and by drawing up petitions in Turkish.

IV. Expropriation Law

The Expropriation Law No. 2942 (Official Gazette No. 18215, dated 04.11.1983) governs land acquisition processes carried out for public interest purposes. The law defines procedural requirements related to notification, valuation, compensation and legal remedies. Where applicable, stakeholder engagement activities related to land acquisition, including information disclosure to landowners and affected users, shall be undertaken in accordance with the Expropriation Law.

V. Environmental Law and Environmental Impact Assessment Regulation

In addition to the legislation explained above, the fundamental law in Turkish Environmental Legislation is the Environmental Law No. 2872 (Issued on 11.08.1983, Official Gazette No.18132, amended by Law No. 5491). According to the Environmental Law, citizens, and the state bear responsibility for the protection of the environment based on the "polluter pays" and "user pays" principles. The law is supported by numerous regulations and decrees prepared or updated in the process of alignment with European Union legislation.

The main stages of the Environmental Impact Assessment are defined by the Turkish Regulation on Environmental Impact Assessment ("EIA") (29.07.2022, OG No. 31907).

The projects requiring an EIA Report, the EIA process and other relevant principles and procedures are detailed in the EIA Regulation. The first Turkish EIA Regulation was put into force in 1993, and it was amended in 1997, 2002, 2003, 2008, 2013 and 2014. Finally, the last EIA Regulation came into force on July 29th, 2022.

The relevant requirements regarding the EIA process have been disclosed to the public in accordance with the Environmental Impact Assessment Regulation of the MoEUCC of the Republic of Türkiye.

Environmental Impact Assessment Regulation

Environmental Impact Assessment procedures are regulated by the EIA Regulation, which entered into force upon publication in the Official Gazette dated 29.07.2022 (No. 31907), and was subsequently amended on 26.06.2025 and 05.03.2026.

The EIA Regulation defines projects subject to EIA, the procedural stages of the EIA process, and requirements for information disclosure and public participation. Amendments introduced in 2025 and 2026 strengthened public announcement and disclosure requirements, including mandatory announcements at provincial directorates, district governorships and mukhtars' offices, thereby enhancing stakeholder access to information at the local level.

Article 9(5) of the EIA Regulation requires authorised institutions or organisations to prepare a SEP for projects subject to the EIA process. The SEP shall outline procedures for informing the public about the project and its potential impacts and for collecting public opinions and suggestions. The SEP is submitted as an annex to the EIA application file and may be updated upon request of the Ministry during the EIA process.

For projects listed under Annex-1 of the EIA Regulation, it is a legal requirement to conduct a Public Information and Participation Meeting to inform affected communities and to receive their views and concerns. This meeting constitutes the formally mandated public consultation activity under Turkish law. For Annex-2 projects, such a meeting is not legally required, and public participation obligations are more limited.

Project's status according to Environmental Impact Assessment Regulation

An EIA Report for the Project was prepared by Çınar Engineering in accordance with the national EIA Regulation published in the Official Gazette on July 29, 2022 (Issue No. 31907). The MoEUCC issued an EIA Positive Decision on January 4, 2024 (Decision No. 7472).

VI. Law on the Protection of Personal Data

The Law on the Protection of Personal Data No. 6698 (Official Gazette No. 29677, dated 07.04.2016), as amended in 2024, governs the collection, processing, storage and disclosure of personal data. Stakeholder engagement activities that involve the collection of personal information, including consultation records, grievance submissions and meeting attendance lists, shall be conducted in compliance with personal data protection principles, including informed consent, data minimisation and confidentiality.

3.2. International Standards

3.2.1. IFC Performance Standards

IFC's Sustainability Framework articulates strategic commitment to sustainable development and is an integral part of IFC's approach to risk management. PSs establish standards that the client is to meet throughout the life of an investment by IFC. Applicable standards guiding social studies are as follows:

- Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts
- Performance Standard 2: Labour and Working Conditions
- Performance Standard 4: Community Health, Safety, and Security
- Performance Standard 5: Land Acquisition and Involuntary Resettlement
- Performance Standard 8: Cultural Heritage

In response to stakeholder engagement, PS1 requires the client to develop and implement a SEP that is scaled to the Project risks and impacts and development stage and be tailored to the characteristics and interests of the affected communities. The SEP will include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable. When the stakeholder engagement process depends substantially on community representatives, the client will make every

reasonable effort to verify that such persons do represent the views of affected communities and that they can be relied upon to communicate the results of consultations to their constituents faithfully.

PS1 specifically requires proponents to:

- Identify and evaluate environmental and social risks and impacts of the Project.
- Adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimise, and, where residual impacts remain, compensate, or offset for risks, and impacts to workers, affected communities, and the environment.
- Promote improved environmental and social performance of clients through the effective use of management systems.
- Ensure that grievances from affected communities and external communications from other stakeholders are responded to and managed appropriately.
- Promote and provide adequate engagement with affected communities throughout the Project cycle on issues that could potentially affect them and ensure that relevant environmental and social information is disclosed and disseminated.

3.2.2. Equator Principles (EPs)

The EPs is a voluntary financial industry benchmark for determining, assessing, and managing social and environmental risks in Project financing.

The EPs are considered the financial industry 'gold standard' for sustainable Project finance. The EPs, based on the IFC PSs on social and environmental sustainability, and the World Bank Group's Environmental, Health and Safety general guidelines, and are intended to serve as a common baseline and framework for the implementation by each adopting institution of its own internal social and environmental policies, procedures and standards related to its Project financing activities.

Equator Principles Financial Institutions ("EPFI") commit to not providing loans to projects where the borrower will not or is unable to comply with their social and environmental policies and procedures that implement the EPs. The list of the EPs presented below:

- Principle 1: Review and Categorisation.
- Principle 2: Environmental and Social Assessment.
- Principle 3: Applicable Environmental and Social Standards.
- Principle 4: Environmental and Social Management System and EP Action Plan.
- Principle 5: Stakeholder Engagement.
- Principle 6: Grievance Mechanism.
- Principle 7: Independent Review.
- Principle 8: Covenants.

- Principle 9: Independent Monitoring and Reporting.
- Principle 10: Reporting and Transparency.

Principle 5 in specific sets out that, "For all Category A and Category B Projects, the EPFI will require the client to demonstrate effective stakeholder engagement as an ongoing process in a structured and culturally appropriate manner with affected communities and, where relevant, other stakeholders. The client will conduct an informed consultation and participation process for projects with potentially significant adverse impacts on affected communities. The client will tailor its consultation process to the risks and impacts of the Project, the Project's phase of development, the language preferences of the affected communities, their decision-making processes, and the needs of disadvantaged and vulnerable groups. This process should be free from external manipulation, interference, coercion, and intimidation".

"The client will take account of, and document, the results of the stakeholder engagement process, including any actions agreed resulting from such process. For projects with environmental or social risks and adverse impacts, disclosure should occur early in the assessment process, in any event before the Project construction commences, and on an ongoing basis".[1]

Principle 6 in specific sets out that "For all Category A and, as appropriate, Category B Projects, the EPFI will require the client, as part of the Environmental and Social Management System ("ESMS"), to establish a grievance mechanism designed to receive and facilitate the resolution of concerns and grievances about the Project's environmental and social performance. The grievance mechanism must be scaled to the risks and impacts of the Project and has affected communities as its primary user. It will seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate, readily accessible, at no cost, and without retribution to the party that originated the issue or concern. The mechanism should not impede access to judicial or administrative remedies. The client will inform the affected communities about the mechanism in the course of the stakeholder engagement process".

The IFC defines stakeholders as individuals or groups who are directly or indirectly affected by a project, as well as those who are not directly affected by a project but have an interest in it and the ability to influence its outcome, either positively or negatively. They may include locally affected communities or individuals and their formal and informal representatives, national or local administrations, politicians, religious leaders and special interest groups, academia or businesses, and direct and indirect workers.

Stakeholder engagement encompasses a range of activities throughout a project's life, divided into key components:

[1] https://equator-principles.com/

- **Stakeholder Identification and Analysis:** Identify and prioritize stakeholders by understanding their interests and concerns.
- **Information Disclosure:** Share relevant information with stakeholders early and consistently, ensuring it's accessible and meaningful.
- **Stakeholder Consultation:** Plan and conduct inclusive consultations, document the process, and communicate outcomes.
- **Negotiation and Partnerships:** Engage in good-faith negotiations on complex issues and form partnerships to add value to mitigation efforts or project benefits.
- **Grievance Management:** Set up accessible systems for stakeholders to raise concerns and grievances throughout the project.
- **Stakeholder Involvement in Monitoring:** Involve stakeholders in monitoring the project's impacts, mitigation measures, and benefits, while also including external monitors for added transparency.
- **Reporting to Stakeholders:** Provide regular updates on the project's environmental, social, and economic performance.
- **Management Functions:** Ensure the company has the capacity to manage stakeholder engagement, track commitments, and report progress.

4. STAKEHOLDER IDENTIFICATION

The first step in stakeholder engagement is identifying who the project's stakeholders are, along with their main groups and subgroups. Following this, stakeholder analysis takes a deeper dive into understanding their interests, how they may be impacted, and the level of influence they might have on the project.

The overall objective of stakeholder identification is to identify and prioritise project's stakeholders for informed consultation and participation. Stakeholder identification is a continuous process. The list of identified stakeholders will be evaluated and updated according to the results of the grievance mechanism and for the different phases of the Project and Project updates.

Potential stakeholders will be categorised and prioritised on the basis of stakeholder status, level of interest or ability to influence.

Community Liaison Officer ("CLO"), who serves as key points of contact between the project and its stakeholders, will be appointed to manage communication, gather stakeholder feedback, and oversee the grievance mechanism. If there are female applicants for the CLO role, their applications will be prioritised to encourage women's participation, receive and report gender-specific grievances, and conduct women-only consultation activities when needed.

3.3. Project's Stakeholders

In general, stakeholders can be categorised into two groups:

- Primary stakeholders are the individuals and communities directly affected by the Project's impacts; and
- Secondary stakeholders are those who have an interest or influence (negative or positive) on the Project.

Primary stakeholders include:

- International bodies and organisations (e.g. international investors, international financial institutions, international non-governmental organisations ("NGOs"),
- National and local NGOs and organisations,
- National government agencies,
- Regional government agencies/authorities,
- Local authorities,
- Trade Unions and Associations,
- Education and training institutions (e.g. universities, education centres),
- Industry (e.g. construction and infrastructure trade associations),
- Project Affected People ("PAPs"),
  - Mukhtars/local authorities of Project-affected settlements,
  - Local community members,
  - Landowners and land users (formal and informal land users), and
  - Affected businesses and employees of businesses
  - Vulnerable groups: elderly, people with disabilities, female-headed households, landless households and/or individuals, ethnic minorities, immigrants, refugees, etc.
- Project workers and workers' representatives,
- Third party suppliers of goods and services, contractors and their subcontractors,
- Social services (e.g. hospitals, local schools and other local community services), and
- Media.

Table 2 shows the identified stakeholders according to the above classification.

Table 2: Stakeholder Classification

Type	Stakeholders	Primary stakeholders		Secondary stakeholders
		Direct	Indirect	
Internal Stakeholders				
Project Owner	Yellice Enerji	X		
Subcontractor	Subcontractors who will be working on the Project	X		
Employees	Project employees	X		
Consultants	Project consultants – if any	X		
External Stakeholders				
International bodies and organizations	Lenders, potential lenders			X
National Governmental Authorities	Ministry of Environment, Urbanization and Climate Change ("MoEUCC") Ministry of Transport and Infrastructure ("MoTI") Ministry of Culture and Tourism ("MoCT") Ministry of Energy and Natural Resources ("MoENR") Ministry of Agriculture and Forestry "(MoAF") Ministry of Interior ("MoI") Ministry of Family and Social Services ("MoFSS") Ministry of National Defence ("MoND")			X

Type	Stakeholders	Primary stakeholders		Secondary stakeholders
		Direct	Indirect	
Regional/Local Authorities	Sivas Governorship Sivas Municipality Sivas Provincial Directorate of Environment, Urbanization and Climate Change Sivas Provincial Directorate of Culture and Tourism Sivas Provincial Directorate of Family and Social Services Sivas Provincial Directorate of Disaster and Emergency Management ("AFAD") Sivas Provincial Special Administration Sivas Provincial Police Department Sivas Provincial Gendarmerie Command Sivas 19th Regional Directorate of State Hydraulic Works ("DSİ") Gürün District Governorship Gürün District Special Administration Directorate Gürün Union for Delivering Services to Villages Gürün Municipality Gürün Social Assistance and Solidarity Foundation Gürün Land Registry Directorate Gürün District Police Department	X		

Type	Stakeholders	Primary stakeholders		Secondary stakeholders
		Direct	Indirect	
	Gürün District Gendarmerie Command Kangal District Governorship Kangal District Special Administration Directorate Kangal Union for Delivering Services to Villages Kangal Municipality Kangal Social Assistance and Solidarity Foundation Kangal Land Registry Directorate Kangal District Police Department Kangal District Gendarmerie Command			
National and Local NGOs and organizations	Sivas Chamber of Commerce and Industry City Councils Nature Association Social Aid and Solidarity Promotion Fund TEMA Turkish Association of Mukhtars Union of Chambers and Commodity Exchanges of Türkiye (“TOBB”) Union of Chambers of Merchants and Artisans Union Chambers of Turkish Engineers and Architects (“TMMOB”) WWF Türkiye			X

Type	Stakeholders	Primary stakeholders		Secondary stakeholders
		Direct	Indirect	
	Gürün Agricultural Credit Cooperative No. 2726 Kangal Agricultural Credit Cooperative No. 2754 Gürün Public Education Center Kangal Public Education Center Gürün Hanımeli Women's Cooperative Kangal Strong Women Initiative and Business Cooperative Gürün Cultural Foundation Kangal Culture and Education Foundation Sivas Journalists Association Gürün Industrialists and Businessmen Association Gürün Headmen Association Gürün Alevi Bektaşi Cultural Association Gürün Shepherds' Breeding Sheep and Ram Breeders Association Green Gürün Local Action Group Association Kangal District Neighborhood and Village Headmen Association Kangal Herd and Kangal Shepherd Dog and Akkaraman Sheep Breeding and Development Association Yellice Village Culture and Cemevi			

Type	Stakeholders	Primary stakeholders		Secondary stakeholders
		Direct	Indirect	
	Construction Association İŞKUR			
Trade unions and associations	Sivas Chamber of Commerce and Industry Sivas Chamber of Agriculture Sivas United Chamber of Artisans and Craftsmen	X		
Education and training institutions	Sivas Provincial Directorate of National Education Sivas Cumhuriyet University Gürün Vocational School Kangal Vocational School Sivas University of Science and Technology Gürün District Directorate of National Education Kangal District Directorate of National Education Karagücük Primary School Alacahan Primary School Kuzyaka Primary School Yeniköy Primary School Sarıca Primary School Alacahan Secondary School Sarıca Secondary School Hakkı Doğan Anatolian High School			X

Type	Stakeholders	Primary stakeholders		Secondary stakeholders
		Direct	Indirect	
Social services	Sivas Provincial Health Directorate Sivas State Hospital Sivas Cumhuriyet University Faculty of Medicine Research and Application Hospital Sivas Numune Hospital Gürün District Health Directorate Kangal District Health Directorate Gürün State Hospital Kangal State Hospital		X	
Agriculture, Livestock and Fisheries	Sivas Provincial Directorate of Agriculture and Forestry Gürün District Directorate of Agriculture and Forestry Kangal District Directorate of Agriculture and Forestry Gürün Chamber of Agriculture Presidency Kangal Chamber of Agriculture Presidency			X
Transportation	TCDD 4th Regional Directorate		X	
Industrial sectors	Çamlıbel Electricity Distribution Joint Stock Company Rönesans Energy Generation and Trading Joint Stock Company Kangal Electricity Energy Generation Joint Stock Company	X		

Type	Stakeholders	Primary stakeholders		Secondary stakeholders
		Direct	Indirect	
	Kangal Thermal Power Plant Electricity Generation Joint Stock Company Sivas Organized Industrial Zone Demir Export Joint Stock Company Aksu Mining Electricity Generation Trade Joint Stock Company Plamako Mining Industry and Trade Joint Stock Company Hestaş Mining Petroleum Construction Surveying Joint Stock Company			
Places of Worship and Cultural Centers	Karasüver Village Güllü Aslan Cemevi Sarıpınar Village Cemevi Ahmet Güllüpınar Cultural Center Alacahan Mosque Etyemez Village Mosque Karagücük Village Mosque Sarıca Tökler Mosque Sarıpınar Village Mosque Şekerpınar Village Mosque Mescit Village Mosque Yeşilvadi Village Mosque	X		
Local communities / Affected settlements / Mukhtars	Etyemez Village Karagücük Village Mescit Village			

Type	Stakeholders	Primary stakeholders		Secondary stakeholders
		Direct	Indirect	
	Karasüver Village Alacahan Village Kızıleniş Village Sarıpınar Village			
PAPs	Vulnerable groups Landowners Formal Land Users Informal Land Users Project affected businesses Employees of businesses	X		
Media	Büyük Sivas Haber Sivas Ekspres Newspaper Sivas İrade Newspaper Bizim Sivas Newspaper Kangal Gündem Newspaper Gürün Gündem Newspaper Sivas FM Radio Radio 58			X

4.1. Identification of Vulnerable Groups

According to the IFC, vulnerability refers to the condition of individuals or groups who may be disadvantaged or marginalized based on characteristics such as race, color, sex, language, religion, political or other opinions, national or social origin, property, birth, or social status. Additional factors like gender, age, ethnicity, culture, education level, illness, physical or mental disability, poverty, economic hardship, or reliance on specific natural resources are also considered. **Vulnerable groups**, including the elderly, children, persons with disabilities, minorities, and those living in poverty, may experience project impacts differently and often have limited access to its benefits and opportunities compared to others.

Within the Social Impact Assessment study conducted by Çınar Engineering in July 2025, vulnerable groups, as presented in the table below, were identified based on the findings of community-level and household surveys conducted in Etyemez, Karagücük, Mescit, Karasüver, Alacahan and Sarıpınar villages. The identification of vulnerable groups will be an ongoing process; therefore, the Project CLO will be responsible of identifying and continuing to engage with vulnerable groups throughout the Project's lifespan.

Table 3: Vulnerable Groups in the Settlements

Vulnerable Groups/Individuals	Etyemez	Karagücük	Mescit	Karasüver	Alacahan	Sarıpınar
Illiterate adults	5	-	6	6	10	-
Does not know Turkish	-	Yes, but number is unknown	Yes, but number is unknown	-	Yes, but number is unknown	Yes, but number is unknown
Seasonal workers	-	-	-	-	-	-
Mobile beekeepers	Yes, but number is unknown	Yes, but number is unknown	-	Yes, but number is unknown	1,000 hives	Yes, but number is unknown
Households whose only income is social support	-	-	-	-	-	-
Elderly people living alone, in need of help	6	3	4	7	15	6
Individuals who are dependent on care or homebound	2	-	-	4	4	1

Vulnerable Groups/Individuals	Etyemez	Karagücük	Mescit	Karasüver	Alacahan	Sarıpınar
People with physical/ mental disabilities	2	1	-	-	2	3

From the early phases of the Project, special consideration and assistance will be provided to people identified as vulnerable to ensure inclusivity on decision making, grievance mechanism and consultation. It will be ensured that targeted consultation is established. All Project related information will be provided to vulnerable groups in a timely and culturally appropriate manner.

The potential negative impacts on vulnerable groups due to the Project can be minimized by providing assistance for:

- the processes required for applying to legal resources,
- accessing compensation,
- helping to access educational opportunities and professional development programs,
- access to essential public services such as water, electricity, and sanitation.

Additional support such as prioritizing them in recruitment, offering travel support especially for accessing healthcare and education services when needed and supporting the individuals who do not speak the local language or have literacy challenges in understanding official documents or communication processes will be considered and implemented where applicable.

5. STAKEHOLDER ENGAGEMENT TOOLS

Table 4 presents the various tools and methods utilized to facilitate effective stakeholder engagement throughout the Project. In this context, a tool refers to any channel, mechanism, or activity intended to inform, consult, or actively involve stakeholders in a meaningful manner. The objective is to ensure that all stakeholders have access to information and can participate in the Project's stakeholder engagement through approaches that best suit their needs and preferences. The performance of these tools will be continuously monitored, and new or alternative methods may be adopted as necessary to strengthen engagement efforts.

Table 4: Stakeholder Engagement Tools

Stakeholder Engagement Tools	Content of the Tools
Community meetings	Held with support from Mukhtars in affected settlements to inform communities about Project impacts, introduce CLO, and explain the grievance mechanism.

Stakeholder Engagement Tools	Content of the Tools
Project website	Central online platform for up-to-date Project information and documents. Discloses Environmental and Social ("E&S") documents, Non-Technical Summary ("NTS"), SEP, grievance mechanism, Project layout, permits, and Project contact.
Online meetings	Conducted with NGOs and governmental institutions, if necessary.
Phone calls, e-mails text messaging	CLO shares contact details and engages directly with stakeholders to provide information, request feedback, or schedule consultations. Enables all stakeholders to share grievances via phone number available at mukhtar offices, public institutions, and common spaces.
Grievance Mechanism	Structured system for all stakeholders (internal and external) to raise concerns via post, email, phone, or in person. A separate mechanism is available for external and internal grievances.
Grievance boxes for internal stakeholders (mainly for employees)	Boxes placed in accessible areas (e.g., cafeteria, rest zones) for employees to submit concerns and suggestions.
Grievance boxes for external stakeholders (mainly for local community)	Located in mukhtar offices, and public spaces for easy access by external stakeholders, especially vulnerable groups.
Project posters / brochures / flyers/billboards	Distributed in public areas (e.g., mukhtar offices, municipalities, professional chambers) with Project information and CLO contact details.
Newspaper	Used for public announcements and major Project updates.
Face to face meetings	Ongoing, direct engagement with stakeholders on Project topics.
Survey	Used for data collection and feedback, especially related to livelihood restoration or specific Project aspects.
Focus Group Discussions ("FGDs")	1–1.5-hour discussions with 6–12 people from targeted groups (e.g., women, elderly, disabled, refugees), facilitated by a moderator.
In-depth interviews	Conducted face-to-face for detailed information during various Project phases.
Household visits	Targeted visits to vulnerable individuals (e.g., elderly, female-headed households) who cannot attend public meetings.

6. PREVIOUS STAKEHOLDER ENGEMENT AND CONSULTATION ACTIVITIES

Stakeholder engagement involves transparently sharing Project-related information to keep stakeholders informed about activities and developments. This includes facilitating clear and accessible disclosure of E&S information by distributing relevant data and reports to stakeholders. It

also entails meaningful stakeholder consultation, implementing a structured approach to engage stakeholders, ensuring their active involvement in the Project's development through open consultations, soliciting feedback, and integrating valuable insights shared by stakeholders.

6.1. Stakeholder Engagement Activities for EIA Phase

In compliance with the national requirements, as part of the EIA Report for the Project, a Public Information and Participation Meeting ("PPM") was held on December 27th, 2021, at 2:00 p.m. at Sarıca Primary School to inform the public and gather their views and suggestions by the Sivas Provincial Directorate of Environment, Urbanization, and Climate Change.

Prior to the meeting, announcements were published for one day on December 4th, 2021 in a national newspaper (*Dünya*) and a local newspaper (*Bizim Sivas*) to inform the local communities about the meeting location and date.

Within the scope of the meeting, a presentation introducing the Project was prepared by Çınar Engineering and made available for public review to gather opinions, suggestions, and objections. The presentation covered key topics including the Environmental Impact Assessment ("EIA") process, its stages, the Project description and objectives, land use in and around the Project area, site selection criteria, Project technology, and the potential environmental and social impacts along with the mitigation measures to be implemented. Stakeholders consulted during the meeting included local residents as well as relevant public institutions and organizations. Following the presentation, the public's views, objections, and suggestions regarding the Project were collected, and their questions were duly addressed.

The MoEUCC sought opinions regarding the Project from the following institutions:

- Ministry of Energy and Natural Resources, General Directorate of Mining and Petroleum Affairs
- Ministry of Agriculture and Forestry, General Directorate of Forestry
- Ministry of Agriculture and Forestry, General Directorate of Nature Conservation and National Parks
- Ministry of Agriculture and Forestry, General Directorate of State Hydraulic Works
- Ministry of Culture and Tourism, Sivas Regional Board Directorate for the Conservation of Cultural Assets
- General Directorate of Meteorology
- General Directorate of Spatial Planning
- General Directorate for the Protection of Natural Assets
- Sivas Governorship, Provincial Directorate of Disaster and Emergency Management
- Sivas Governorship, Provincial Directorate of Agriculture and Forestry

- Sivas Governorship, Special Provincial Administration
- Sivas Governorship, Provincial Directorate of Environment, Urbanization and Climate Change

6.2. Stakeholder Engagement Activities for Gap Analysis Report

As part of the site visit conducted for the Gap Analysis Report on 3-4 November 2025, community-level surveys and meetings were held with the Mukhtars of Mescit and Karasüver Villages, with the participation of Project representatives.

Community level surveys were conducted, which included questions on demographic profile, socioeconomic structure, and livelihoods of the local communities; infrastructure and services; and ecosystem service usage and land use in the settlements. Also, the anticipated positive and negative impacts of the Project were discussed with the mukhtars. The discussions indicate no anticipation of negative impacts by the Project on the settlements. It is expected that the Project will create employment opportunities and community development through social responsibility projects.

7. FUTURE STAKEHOLDER ENGAGEMENT AND CONSULTATION ACTIVITIES

7.1. Stakeholder Engagement Activities for Land Acquisition

Stakeholder engagement activities in relation to land acquisition and expropriation process will be made accordingly to the national regulations and IFC PS 5.

The Project affects privately owned land parcels, as well as forestry, pasture, and treasury lands. The land acquisition and expropriation processes are being implemented by Yellice Enerji in accordance with applicable national legislation.

In line with international standards, a Livelihood Restoration Plan (“LRP”) is being developed to address potential impacts on the livelihoods of affected land users. The LRP seeks to ensure that affected persons are supported in restoring, and where feasible improving, their pre-project income levels and living standards through targeted mitigation measures, monitoring frameworks, and ongoing stakeholder engagement.

To inform the preparation of the LRP, WSP conducted social fieldwork in Sivas between 25-27 April 2026, including consultations with land users, affected settlement mukhtars, and landowners. As part of this fieldwork, the villages of Alacahan, Mescit, Etyemez, Karagücük, Kızıleniş, Karasüver, and Sarıpınar were visited. The consultations were attended by the Yellice WPP Operation Manager. These engagement activities were undertaken to inform stakeholders about the land acquisition process, collect baseline data on land use and livelihoods, and identify potential risks and mitigation measures.

The engagement methods included one-on-one interviews with landowners and land users, meetings with village mukhtars, and site observations. Key topics covered land ownership and usage patterns, dependency on affected land (including agricultural and grazing activities), and expectations regarding

compensation. Particular attention was given to identifying potentially vulnerable stakeholders and ensuring their perspectives were considered. The outcomes of these consultations have informed the development of the LRP.

7.2. Stakeholder Engagement Activities for Information Disclosure

Future stakeholder engagement activities for general information disclosure will focus on providing clear, timely, and accessible updates regarding the Project's progress, key decisions, and potential impacts. These activities will include public meetings, informational materials, and updates through various communication channels such as the Project website and social media. Scheduled throughout the Project's timeline, they aim to reach all relevant stakeholders, provide key updates, and solicit feedback. Responsibilities for these activities will be assigned to designated team members to ensure effective dissemination of information.

8. STAKEHOLDER ENGAGEMENT PROGRAMME

The stakeholder engagement programme aims to inform, disclose, and consult with all stakeholders using the various engagement tools. Different engagement tools are proposed to ensure informed consultation and participation during the Project implementation in a culturally appropriate manner, respectful of human rights and considering gender inclusion.

8.1. Proposed Programme for Project Phases

The proposed stakeholder engagement programme is presented in Table 5.

Pre-construction activities will focus on disclosure of the Project information, including the Project construction schedule, land acquisition and land access issues. Engagement activities during the construction phase will focus on minimising project-related construction impacts. During the transition from the construction phase to the operation phase, the SEP will be updated to address operational activities.

The SEP will undergo annual updates to incorporate the latest Project developments and information. Stakeholder identification will be reassessed, and the stakeholder list will be updated accordingly.

Regular stakeholder engagement activities will be conducted throughout all Project phases to keep stakeholders informed about Project progress. Special activities during construction, such as energy resource disruptions, or road closures, will be communicated promptly by the CLO to the affected communities.

For the operation phase, the local communities will be informed about the transition period, the impact of the operational phase, the displacement of local employment and the reduction in demand for goods and services. The CLO of the Project will be trained on the implementation of the SEP, and the contact details of the CLO will be provided to all affected stakeholders.

Table 5: Stakeholder Engagement Programme

Project stage	Target stakeholders	Topic(s) of engagement	Engagement Tool	Location	Frequency	Responsibilities
Before Construction	**Project Affected People** Project Affected People ("PAPs"), including landowners, land users, and vulnerable groups	Project information on design, schedule, environmental and social impacts of the Project construction, commissioning and operation Land acquisition, compensation, livelihood restoration, Project scope and timeline, grievance mechanism, introduction of the Project CLO, vulnerability and gender considerations	1. Disclosed NTS and SEP 2. Brochures/leaflets 3. Community meetings, face-to-face meetings 4. FGDs and surveys, in-depth interviews	Each affected settlement, project office, mukhtar offices, public areas	1. & 2. Prior to Construction, reviewed for updates every year 3. Once prior to the commencement of construction, with additional meetings as needed based on stakeholder feedback or Project developments 4. If needed	Yellice Enerji Subcontractors of Yellice Enerji
	Local Communities Residents in nearest settlements Mukhtars of the settlements	Project information on design, schedule, environmental and social impacts of the Project construction, commissioning and operation Project impacts, benefits, community development opportunities, environmental and social risks, grievance	1. Disclosed NTS and SEP 2. Brochures/leaflets 3. Community meetings, face-to-face meetings 4. FGDs and surveys, in-depth interviews, public notices	Nearest settlements, and public areas	1. & 2. Prior to Construction, reviewed for updates every year 3.Once prior to construction activities, with additional meetings as needed based, if required	Yellice Enerji Subcontractors of Yellice Enerji

Project stage	Target stakeholders	Topic(s) of engagement	Engagement Tool	Location	Frequency	Responsibilities
		mechanism, introduction of the Project CLO, vulnerability and gender considerations			4. If needed	
	Governmental Parties Municipalities, governorates, district authorities, academic institutions	Project scope, land acquisition, expropriation procedures, compensation, Project E&S findings, grievance mechanism, coordination roles	1. Disclosed NTS and SEP 2. Brochures/leaflets 3. Face-to-face or online meetings 4. Stakeholder visits 5. Emails	Relevant public institutions, project office	1. & 2. If needed around key milestones or if coordination is required 3. & 4. & 5. If needed	Yellice Enerji
	Non-Governmental Parties NGOs, media, workers' and business organizations	Disclosure of Project documents, stakeholder roles, grievance mechanism, E&S risks	1. Disclosed NTS and SEP 2. Brochures/leaflets 3. Face-to-face or online meetings 4. Stakeholder visits 5. Emails	Project office, NGO offices, affected provinces	1. & 2. If needed when significant environmental/social issues or media/public interest events occur 3. & 4. & 5. If needed	Yellice Enerji
Construction	**PAPs**	Updated construction status, construction-related grievances, environmental and social awareness, construction phase E&S	1. Disclosed NTS and SEP 2. Brochures/leaflets	Affected settlements, Project office (upon request), mukhtar	1. & 2. Prior to Construction, reviewed for updates every year	Yellice Enerji Subcontractors of Yellice Enerji

Project stage	Target stakeholders	Topic(s) of engagement	Engagement Tool	Location	Frequency	Responsibilities
		impacts, community health and safety, local employment, livelihood impacts, construction updates and schedule	3. Community meetings, face-to-face meetings 4. FGDs and surveys, in-depth interviews	offices, village public areas	3. Once prior to the commencement of construction, with additional meetings as needed based on stakeholder feedback or Project developments 4. If needed	
	Local Communities	Construction impacts, environmental and social risks, community development opportunities, local employment, community health and safety, grievance mechanism, vulnerability and gender considerations	1. Disclosed NTS and SEP 2. Brochures/leaflets 3. Community meetings, face-to-face meetings 4. FGDs and surveys, in-depth interviews	Nearest settlements, and public areas	1. & 2. Prior to Construction, reviewed for updates every year 3. Once prior to the commencement of construction, with additional meetings if significant impacts arise (e.g., increased traffic, noise complaints) 4. If needed	Yellice Enerji Subcontractors of Yellice Enerji

Project stage	Target stakeholders	Topic(s) of engagement	Engagement Tool	Location	Frequency	Responsibilities
	Governmental Parties	Construction phase updates, environmental and social risks, grievance mechanism, coordination roles, local employment, community health and safety	1. Disclosed NTS and SEP 2. Brochures/leaflets 3. Face-to-face or online meetings 4. Stakeholder visits 5. Emails	Relevant public institutions, Project office	1. & 2. If needed around key milestones or if coordination is required 3. & 4. & 5. If needed	Yellice Enerji
	NGOs, Media, Workers' and Business Organizations	Construction-related E&S impacts, stakeholder roles, grievance mechanism, local employment, environmental and social awareness	1. Disclosed NTS and SEP 2. Brochures/leaflets 3. Face-to-face or online meetings 4. Stakeholder visits 5. Emails	Project office and NGO offices	1. & 2. If needed when significant environmental/social issues or media/public interest events occur 3. & 4. & 5. If needed	Yellice Enerji
Operation	**PAPs**	Transition process from construction to operation, introduction of operation phase CLO, grievance roles, operation phase E&S issues, community health and safety, information disclosure	1. Disclosed SEP 2. Brochures/leaflets 3. Community meetings, face-to-face meetings 4. FGDs and surveys, in-depth interviews	Each affected settlement, Project office (upon request)	1. & 2. Prior to Operation, reviewed for updates every year 3. Once prior to the commencement of construction, with additional meetings if significant impacts arise	Yellice Enerji Subcontractors of Yellice Enerji

Project stage	Target stakeholders	Topic(s) of engagement	Engagement Tool	Location	Frequency	Responsibilities
					4. If needed	
	Local communities	Operation impacts, community health and safety, grievance mechanism, environmental and social risks, introduction of operation phase CLO, role of local employment	1. Disclosed SEP 2. Brochures/leaflets 3. Community meetings, face-to-face meetings 4. FGDs and surveys, in-depth interviews	Nearest settlements, and public areas	1. & 2. Prior to Operation, reviewed for updates every year 3. Once prior to the commencement of construction, with additional meetings if significant impacts arise (e.g., increased traffic, noise complaints) 4. If needed	Yellice Enerji Subcontractors of Yellice Enerji
	Other Interested Parties (External)	Information disclosure (national/local media), operation phase E&S impacts, community health and safety, local employment	1. Project website 2. Newspapers 3. Stakeholder visits	Institution visits, public spaces, and Project office (upon request)	1. & 2. If needed around key milestones or if coordination is required 3. If needed	Yellice Enerji

8.2. Proposed Strategy for the Information Disclosure

Project E&S documents, NTS and the SEP will be disclosed at the Project website and will be available in Turkish and English. The hard copies of the NTS and the SEP will be provided to the mukhtars of the affected settlements.

The following tools will be used to communicate Project updates and raise awareness:

- Project website,
- Local media,
- Notice boards of the Mukhtars' offices, and
- Leaflets and banners.

All NGOs, associations and other interested organisations listed in Table 2 will be informed about the disclosure process and the relevant website links of the Project documents will be shared with them. Where required, copies of the disclosure package will be sent by e-mail or hard copies of the disclosure package will be sent by post.

During the Project development and construction phase, the CLO will prepare quarterly reports that present the Project's social performance and the engagement activities, and the grievance mechanism outputs.

8.3. Proposed Strategy for Consultation

This SEP has been developed to engage with stakeholders during the pre-construction, construction and operation phases of the Project, to inform stakeholders about the Project activities, to address their concerns and to involve them in the decision-making processes in a participatory approach. In order to establish sound stakeholder engagement activities, the following consultation strategies will be applied throughout the Project lifecycle:

- A CLO will be appointed for the Project.
- Targeted consultations will be carried out with the identified vulnerable groups to ensure their participation during the information disclosure, engagement, and grievance management.
- All proposed engagement tools will provide the name of the CLO, the contact details, and the grievance mechanism.

9. GRIEVANCE MECHANISM

The *IFC Good Practice Note: Addressing Grievances from Project-Affected Communities 2009* defines a grievance as "a concern or complaint raised by an individual or a group within communities affected by company operations" (p. 8). Projects should develop a grievance mechanism to provide a structured way for addressing these concerns, ensuring transparency and responsiveness in handling

grievances. This procedure is designed to outline indicators for effectively managing community and employee complaints that may arise from Project activities.

A Grievance Mechanism ("GM"), including a grievance form will be developed as a part of this SEP, ensuring that the grievances from the stakeholders are resolved in a fair, transparent, and timely manner.

The Grievance Mechanism will cover all internal and external stakeholders and all employees. The grievance mechanism is the key tool that allows stakeholders to provide feedback, concerns and complaints related to the Project. The grievance mechanism aims to demonstrate responsiveness to stakeholder needs and facilitate a trustworthy and constructive relationship with the stakeholders by developing appropriate mitigation strategies. The objectives of the grievance mechanism are to:

- provide culturally appropriate ways and means for affected people to express their grievances during the project (from site preparation to decommissioning),
- ensure that grievances are kept confidential and not shared outside the process,
- establish transparent and mutually respectful relationships with communities,
- ensure that corrective actions are identified and implemented,
- verify that affected people are satisfied with the corrective action taken; and
- avoid the need for legal action; however, the grievance mechanism does not prevent stakeholders from accessing the legal system.

Grievances can be submitted by internal and external stakeholders through the following methods:

- Grievance boxes accessible at the settlements and the Project Area,
- Submitting a grievance in person to mukhtars and/or grievance form to be submitted via mukhtar,
- By mail (to the postal address of Yellice Enerji),
- Via e-mail to Yellice Enerji,
- Submitting a grievance to the CLO by telephone,
- Submitting a grievance in person to the CLO.

The requests will be logged in a Request & Grievance Log / Database. The request will be logged as a worker or community request and the grievances will be logged in a grievance registration system by Yellice Enerji in categories. The grievances can be categorized as:

- Environmental issues (e.g., noise, dust, waste management) related complaints,
- Labour or occupational health and safety-related complaints,
- Complaints or reports regarding damages and losses caused by construction activities,

- Reports of discriminatory treatment based on gender, age, disability, religion, language, race, sect, ethnicity, social status, political views, health condition, marital status, etc.,
- Grievances related to Gender-Based Violence and Harassment ("GBVH"), sexual abuse, harassment, exploitation, and assault,
- Complaints or concerns related to land acquisition, including disputes or grievances regarding compensation, land rights, or relocation.

The grievance management process will follow these key steps to ensure timely and effective resolution:

1) **Grievance Submission** – Stakeholders may submit grievances through various accessible channels (e.g., in person, via phone, email, or grievance boxes).
2) **Registration and Logging** – Each grievance will be recorded in the grievance register, assigned a reference number, and categorized for tracking.
3) **Acknowledgement** – Complainants will receive confirmation of receipt within a defined timeframe.
4) **Review and Assessment** – The grievance will be evaluated to determine its eligibility, seriousness, and urgency.
5) **Investigation and Response** – A fair and transparent investigation will be conducted, followed by a proposed resolution or corrective action.
6) **Feedback and Closure** – The proposed outcome will be shared with the complainant. If accepted, the grievance will be formally closed and documented.
7) **Follow-up (if needed)** – In cases requiring corrective action, follow-up will be conducted to verify implementation and effectiveness.

9.1. Governmental Grievance Mechanism- all stakeholders

The public may submit any concerns, complaints, or requests through the Presidential Communication Centre ("CIMER"). This centre is an active 24-hour online national system developed by the Directorate of Communications to maintain open communication between public and the government. It enables individuals to report issues or make requests at any time and from any location, with submissions and responses managed entirely through this online system.

The CIMER system enables stakeholders to communicate directly with Yellice Enerji during the Project lifespan. Still, a separate grievance mechanism system will be established for the Project in which the stakeholders can receive their responses locally and communicate their complaints. This Project-level grievance system will be established within Yellice Enerji, implemented, and followed during the Project lifespan.

Affected communities will be informed of their right to raise concerns through the Project's grievance mechanism and, if they are not satisfied with the response received, to further escalate their grievances through alternative channels such as CIMER.

9.2. Internal Grievance Mechanism – for Workers

Yellice Enerji's internal grievance mechanism will be available to all Project workers, including direct and indirect employees. This system allows workers to report any issues or conditions that may negatively affect them, ensuring that such concerns are addressed fairly and respectfully. Grievances may relate to issues such as internal communication breakdowns, misuse of authority, discrimination based on race, colour, national origin, religion, age, sex, sexual orientation, gender identity, sexual harassment, or disability status.

Workers will have the right to submit grievances anonymously if they choose, and confidentiality will be strictly maintained. Yellice Enerji will not share the identity of any grievance holder without their explicit consent. When consent is provided, only those directly involved in resolving the grievance will be informed. Results or outcomes of anonymous grievances will be announced via internal bulletin boards, regular toolbox meetings, or other general staff communication channels to ensure transparency without compromising anonymity.

A gender-sensitive approach will be integrated into the mechanism to effectively address cases of GBVH throughout the Project lifecycle. All GBVH-related grievances will be handled by nominated, trained staff.

The mechanism will support affected individuals and allow anonymous submissions. Hence, the grievance mechanism ensures that all stakeholders, including vulnerable groups and survivors of GBVH, have a structured and formal means to report complaints and receive prompt, fair, and effective responses.

Workers will have access to multiple grievance channels such as:

- **Grievance Boxes:** Secure and clearly marked boxes will be placed at easily accessible locations such as worker accommodation areas, canteens, and entrances to work sites.
- **Grievance Forms:** A standardized grievance form will be made available near grievance boxes and in common areas. A sample form is included in APPENDIX B of this SEP.
- **In-Person Submission:** Workers may submit grievances directly to worker representatives or designated personnel, which will then be formally logged.
- **Email or Phone Submission:** An internal grievance can be submitted through email address and phone line of the Yellice Enerji.

9.3. External Grievance Mechanism – for communities

Yellice Enerji will establish an external grievance mechanism as part of the Project's management system to address any concerns raised by affected communities and stakeholders. The aim is to provide transparent, accessible, and efficient channels through which stakeholders can submit their concerns, receive information, and obtain fair and timely resolutions.

Grievances can be submitted through multiple channels, including:

- **Grievance Forms**: Available on the Project website, at the Project Area, in mukhtar offices, and at key Project facilities. (A sample external grievance form is presented in APPENDIX C)
- **Mukhtars**: Local mukhtars can collect and forward grievances to the Project CLO.
- **CLO In Person**: The CLO will be available on-site to receive and address concerns.
- **CLO Telephone Line**: A dedicated phone line will be set up for verbal submissions.
- **Project Email Address**: An official email address in the Project web site will be used for electronic submissions.

These options ensure that community members can easily raise issues and seek resolution through the method most convenient to them. For **anonymous complaints**, feedback and outcomes will be shared through general information channels such as public notice boards at mukhtar offices and Project Area entrances without revealing any personal details.

All received grievances will be logged in a grievance registration system by Yellice Enerji. Designated and trained staff will maintain a grievance log, tracking submission details, follow-up actions, and outcomes.

Grievance management process:

- All grievances will be **acknowledged within 3 days** of receipt.
- A formal **response will be provided within 30 days**.
- **Land-related grievances will be prioritized and resolved within 7 days** to ensure the timely continuation of land access and project activities.

The workflow of the grievance mechanism is shown in Figure 3.

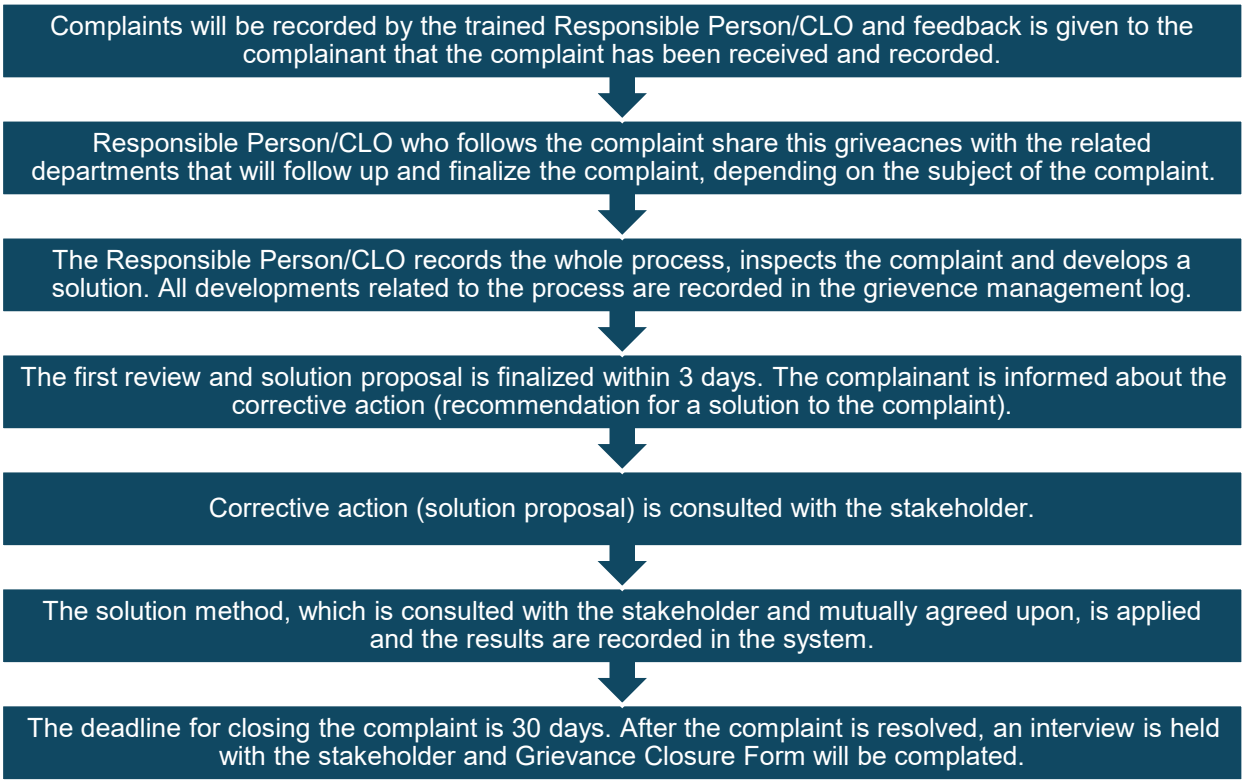


Figure 3: Grievance Management Workflow

The grievance mechanism will be widely announced to the public through stakeholder engagement activities. Tailored engagement will be organized to target women and vulnerable groups to share Project information as well as information on Project GM.

9.4. Receiving and Assessment of Anonymous Grievances

If external or internal stakeholders are unable or unwilling to provide their contact details or identity, their submissions will be treated and recorded as anonymous complaints or suggestions. Stakeholders can convey all of their wishes and complaints, without specifying their names, to the grievance boxes placed at specific points for external stakeholders or via Yellice Enerji phone number in its website.

Grievances are received anonymously and assessed by applying the steps defined in the workflow. To protect confidentiality, cameras are not installed in areas where complaints are submitted. This prevents the disclosure of complainants' identities and ensures their anonymity. Within the scope of the complaint, it will be evaluated through investigation/examination processes, and each stage will be recorded in the grievance register system. Third parties will not be informed about complaints that need to be kept confidential.

When the grievance is concluded, although there will be no formal feedback on the solution to be implemented, if it is an issue that needs to be informed by the public and if deemed necessary, it can be announced to the stakeholders through common boards/ public and general communication tools.

10. MONITORING

Monitoring activities will be conducted throughout all phases of the Project to evaluate the SEP's compliance with Project standards. If any non-conformities are identified during monitoring, they will be investigated, and suitable corrective actions will be determined.

The Project SEP will be reviewed and updated annually, and in different Project phases. Grievances will be recorded and collected monthly, with quarterly reports submitted to Project Management for prompt resolution. Summary reports of grievance records will be provided to Project Management on a quarterly basis. Quarterly summaries will be used for evaluation of:

- transparency and accessibility of the engagement process,
- provision of relevant information,
- timeliness of responses (ongoing communication),
- clarity and simplicity of information provided, and
- applicability and relevance of the information provided.

A set of Key Performance Indicators ("KPIs") have been defined to enable monitoring and evaluation of the implementation of the SEP and guide updates and revisions of the document. Table 6 summarizes the KPIs and associated key monitoring actions that will be used to assess the progress and effectiveness of the SEP.

Table 6: KPIs and Monitoring Actions – Stakeholder Engagement

ID	KPI	Target	Monitoring Measure
Consultation and Information Disclosure			
SEP-KPI-01	Registration of stakeholder engagement activities	Target of 100%	Stakeholder Meeting Register
SEP-KPI-02	▪ Consultation records ▪ Materials shared with the stakeholders (brochure, presentations) ▪ Number of the meetings held ▪ Number of the participants who attended the public consultation meetings ▪ Visits to local authorities or other local stakeholders ▪ Frequency of the visits to the settlements affected by the Project	Development of biannual reports on the consultation activities	Reporting

ID	KPI	Target	Monitoring Measure
	▪ Number of newspapers to share the information ▪ Any updates on the Project website ▪ Any type of announcements (information banners, calls)		
SEP-KPI-03	▪ Disclosure of Project's E&S documents	Disclosure of documents on an annual basis	Project Website
Implementation of Grievance Mechanism			
SEP-KPI-04	Total number of grievances submitted by community members	The total number reduced per year	Grievance Log / Database
SEP-KPI-05	Number of grievances responded to within targeted time frame	The target of 100%	Grievance Log / Database
SEP-KPI-06	Reporting of grievance records summaries	Quarterly	Reporting
SEP-KPI-07	Providing feedback to stakeholders on the implementation and outcomes of the grievance mechanism	Delivery of regular reports to stakeholders on the outcomes of the grievance mechanism	Reporting
SEP-KPI-08	Auditing the SEP and grievance mechanism to ensure that they are being implemented and that grievances are being adequately addressed	Biannual (construction), Annual (operation) Target of 100% of grievances closed out to the satisfaction of complainant within the targeted time frame	Annual Assessment Report / Audit report

11. TRAINING

All relevant workers of the Project and contractors' workers will receive induction training, which will include general awareness-raising on environmental and social requirements. As part of this induction, all workers will be informed about the Project's SEP and Grievance Mechanism, including how to submit grievances, confidentiality provisions, and available support channels.

In addition to the general induction training, targeted training on stakeholder engagement and the implementation of the Grievance Mechanism will be delivered to the CLO, as well as other key staff

of Yellice Enerji and its subcontractors who are directly involved in or responsible for community-facing activities under the supervisors of Yellice Enerji.

The need for refresher training on the SEP and the Grievance Mechanism will be periodically assessed by the CLO and repeated as necessary to ensure continued awareness and effective implementation.

12. REPORTING and AUDIT

Grievances will be recorded and collected monthly, with quarterly reports submitted to Project Management for prompt resolution. Summary grievance reports will also be prepared quarterly to evaluate both the number and nature of received complaints, as well as the Project's effectiveness in addressing them promptly and appropriately.

For transparency and effective stakeholder engagement, the Project will disclose the Project SEP and NTS at the Project website. Additionally, grievance mechanism summary reports will be ready to share upon request, detailing how stakeholder grievances are received, addressed, and resolved, ensuring accountability and trust throughout the Project lifecycle.

To keep external stakeholders informed, the Project will disclose annual statistics, including activity records, meeting participation numbers, types and quantities of grievances raised per settlement, and the resolution timelines for each grievance.

Yellice Enerji will internally monitor compliance with this SEP in accordance with its requirements. Periodic assessments will be conducted to ensure adherence to the SEP, including auditing the grievance mechanism to confirm its proper implementation and effective resolution of grievances. The annual assessment report of the SEP and GM will serve as an official audit report.

Records will be kept on the following subjects:

1) Consultation meetings.
2) Stakeholder engagement activities.
3) Grievances raised and actions taken to close them
4) Opinions/suggestions/comments provided by the community members during consultation meetings and stakeholder engagement activities (to be recorded in the grievance mechanism).
5) Press releases and interviews.
6) Records of audits, inspections and incidents.

Reporting requirements are presented in Table 7.

Table 7: Reporting & Monitoring Time Frame

Monitoring Type	Frequency	For	Content
Reporting	Quarterly	Project management	Comprehensive records of all stakeholder engagement activities, number of participants attended to the meetings, number and type of the grievances raised per settlement, timeline for the resolution of each grievance
Reporting	Biannually	Project management / Local communities	Statistics of the records of the activities, number of participants attended to the meetings, number and type of the grievances raised per settlement, timeline for the resolution of each grievance
Performance Monitoring	Biannually (construction), Annually (operation)	Project management	Summarising progress against determined KPIs, summary schedule of grievance status, workforce analyses
Impact Monitoring	Biannually	Project management / PAPs	Summarising assessment of progress towards living standard restoration, livelihood restoration; identification of any areas of non-compliance and agreed corrective actions

13. ROLES AND RESPONSIBILITIES

Yellice Enerji has the overall responsibility in relation to implementation of the SEP. During the construction phase of the Project, the following roles and responsibilities related to stakeholder engagement will be implemented by Yellice Enerji. The roles and responsibilities will be updated for each Project phase where relevant.

Table 8: Roles and Responsibilities

Roles	Detailed Responsibilities
General Manager	▪ Approval of this SEP and resources required for implementation. ▪ Ensure adequate resources are provided for implementation of this SEP. ▪ Monitoring the correct and effective implementation of the SEP. ▪ Overall responsible for ensuring the implementation of all environmental and social management plans. ▪ Assist the Operation Manager and the Site Chief when required.
Operation Manager	▪ Oversight of environmental inspections and mitigation measures implementation. Maintaining records of environmental monitoring activities. ▪ Manage, improve, monitor and update this SEP and ensure effective implementation of the management measures.

Roles	Detailed Responsibilities
	▪ Ensure technical support is provided to Contractors for implementation of the SEP. ▪ Ensure related trainings are provided by the Contractors, through review of training records and related training documents. ▪ Conduct/organize periodic audits. ▪ Organize trainings related to this SEP. ▪ Ensure the SEP is distributed to all Contractors. ▪ Ensure targeted KPIs covered in the SEP are met within the given timeline.
Site Chief	▪ Ensure the implementation of this SEP. ▪ Routine monitoring/inspections of the Project Area and effectiveness of management measures. ▪ Record non-compliances, propose corrective actions (if required) and follow-up of the actions. ▪ Ensure the worker grievance mechanism is being announced and easily accessible to all workers. ▪ Monitor the performance of the Contractors. ▪ Support CLO when and/if corrective action of a grievance requires Site Manager's decision/action. ▪ Monitor the regular reports of the CLO and the grievance records.
Subcontractors' Project Managers and OHS Specialists	▪ Develop its own procedure to fully implement this SEP. ▪ Ensure compliance with Project Standards and contractual agreements. ▪ Ensure related non-compliances are recorded and responded to immediately. ▪ Conduct internal audits and record identified incompliances. ▪ Provide related trainings. ▪ Provide staff, equipment and material for management measures.
CLO	▪ Maintain ongoing relations with the targeted stakeholders and identify new stakeholders as the Project progress. ▪ Provide Project related information on behalf of Yellice Enerji. ▪ Manage Grievance Mechanism. ▪ Ensure grievance mechanism is publicly announced and easy to access for all stakeholders. ▪ Ensure all grievances are received and addressed within the targeted deadlines. In case the resolution process exceeds the targeted deadline, ensure to communicate with the complainant about the ongoing process. ▪ Keep all records of the stakeholder engagements (formal and/informal) logged in a database. ▪ When required, work with relative departments to resolve the grievances. ▪ Ensure that the SEP is being updated accordingly. ▪ Provide regular reporting and outcomes of the grievance mechanism. ▪ Ensure employment opportunities are being promoted within the affected communities.

Roles	Detailed Responsibilities
All employees (direct and/or indirect)	▪ Participate in the trainings. ▪ Ensure compliance with management measures.

14. CONTACT DETAILS

A CLO will be assigned for the implementation of the SEP that includes engagement activities and the grievance mechanism management of the Project.

Project website: https://www.eforholding.com/sektor/enerji-3

Project Site: To be disclosed.

Yellice Enerji Communication Phone Number: +90 216 252 07 46

e-mail: info@eforholding.com

The contact number of the CLO will be disclosed.

15. REFERENCES

- EIA Report of Yellice Wind Power Plant Project (32 Turbine, 160 MWm/160 MWe), 2023
- Social Impact Assesment Report prepared by Çınar Engineering, July 2025
- Gap Analysis Report prepared by WSP, January 2026
- International Finance Corporation. (2009, August 31). Addressing grievances from project-affected communities: Guidance for projects and companies on designing grievance mechanisms. World Bank Group. https://www.ifc.org
- Equator Principles Association. (2020). The Equator Principles (EP4, EP5, EP6). https://equator-principles.com/wp-content/uploads/2020/05/The-Equator-Principles-July-2020.pdfhttps://equator-principles.com/wp-content/uploads/2020/05/The-Equator-Principles-July-2020-v2.pdf

APPENDIX A - Stakeholder Engagement Activity Registration Template

No	Date	Project Party conducted to engagement activity	Name of the stakeholder/participants (if provided)	Type of consultation	Aim of the consultation	Location of the consultation	Summary of the engagement activity

Yellice Enerji Üretim A.Ş.
İçerenköy Mah. Destan Sok. Efor Plaza No:6
İç Kapı No:16 Ataşehir / İstanbul / Türkiye
T: +90 0850 275 0 746 / +90 0216 252 0 746 / info@eforholding.com

APPENDIX B - Sample Internal Grievance Form

EMPLOYEE GRIEVANCE FORM	
To be filled out by the employee – Grievance holder	
Date of the grievance (complaint/opinion/suggestion/ request)	……
Full Name of the employee *Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent*	…….. ¨ I request non-disclosure of my identity information ¨ I would like to submit an ANONYMOUS claim
Company Information	……
Contact Information *Please mark how you wish to be contacted*	¨ By Post: Please provide mailing address …….. ¨ By person:…… ¨ By telephone:…… ¨ By e-mail:…… ¨ Other:……
The grievance history	Occurred in □ One-time event □ Multiple times (...) □ Continues/on-going
Detailed description of the Grievance: *Please add if any visual material available (photography video etc.)*	
Have you ever filed a grievance form on the same issue before? (Please specify)	

How can your complaints be resolved? Please provide your suggestions.	
Please do not fill the following sections of the form. To be filled out by the CLO or Project Representatives	
How was the comment received? ¨ In person ¨ By phone ¨ By mail ¨ By grievance box number: (please include the box number) ¨ Other (please describe)	
Grievance registration number and date:	**Grievance Recorder:**
Related Department:	
Closing the Grievances	
ASSESSMENT and PROPOSED ACTIONS:	
ACTIONS TAKEN:	
Grievance closure date:	
Grievance Holder **First-Last Name and Signature**	**On Behalf of Yellice Enerji** **Title-First Name-Surname and Signature**

APPENDIX C - Sample External Grievance Form

Introductory Information	
Date of the grievance (complaint/opinion/suggestion/ request)	……
Full Name of the stakeholder *Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent*	…….. ¨ I request non-disclosure of my identity information ¨ I would like to submit an ANONYMOUS claim
Province/District/Settlement *where the grievance occurred*	……
Contact Information *Please mark how you wish to be contacted*	¨ By Post: Please provide mailing address …….. ¨ By person:…… ¨ By telephone:…… ¨ By e-mail:…… ¨ Other:……
The grievance history	Occurred in □ One-time event □ Multiple times (...) □ Continues/on-going
Information about the Grievance	
Detailed description of the Grievance: *Please add if any visual material available (photography video etc.)*	

Have you ever filed a grievance form on the same issue before? (Please specify)	
Do you know if any other locals that are experiencing the same issue? (Please provide the names and the contact details)	
How can your complaints be resolved? Please provide your suggestions.	
Please do not fill the following sections of the form. To be filled out by the CLO or Project Representatives	
How was the comment received? ¨ In person ¨ By phone ¨ By mail ¨ By grievance box number: (please include the box number) ¨ Other (please describe)	
Grievance registration number and date:	**Grievance Recorder:**
Closing the Grievances	
Detailed explanation related to actions taken, date, monitoring of the action etc.:	
Grievance closure date:	
Grievance Holder **First-Last Name and Signature**	**On Behalf of Yellice Enerji** **Title-First Name-Surname and Signature**

APPENDIX D - Grievance Closure Form

Grievance Closure Form	
Date of the grievance (complaint/opinion/suggestion/ request)	……
Grievance registration number and date:	…….
Province/District/Settlement *where the grievance occurred*	……
Grievance Details	
Description of the Grievance:	
Actions Taken	
Detailed Explanation of Actions Taken:	
Date of Actions Taken: _____	
Monitoring and Follow-up Actions:	
Grievance closure date:	
Outcome:	

Grievance Holder **First-Last Name and Signature** *Note: The grievance holder can remain anonymous if they prefer or request not to disclose their identity to the third parties without their consent*	**On Behalf of Yellice Enerji** **Title-First Name-Surname and Signature**

APPENDIX E- Request & Grievance Log / Database

Grievance ID (Registration No)	Date	Company Representative Who Recorded the Grievance	Internal/External	Grievance Holder	Province/District/Village of the Grievance Holder or Company of the employee	Grievance Subject	Short description of the grievance	Category[2]	Related Department	Suggested Action	Action Taken	The date of the action taken	Grievance Status	Closure date of the grievances

[2] Request: Labour or community o and Grievance :Environmental, Labour, OHS, Damages and losses caused by construction activities, Discriminatory, GBVH , Land acquisition and livelihood