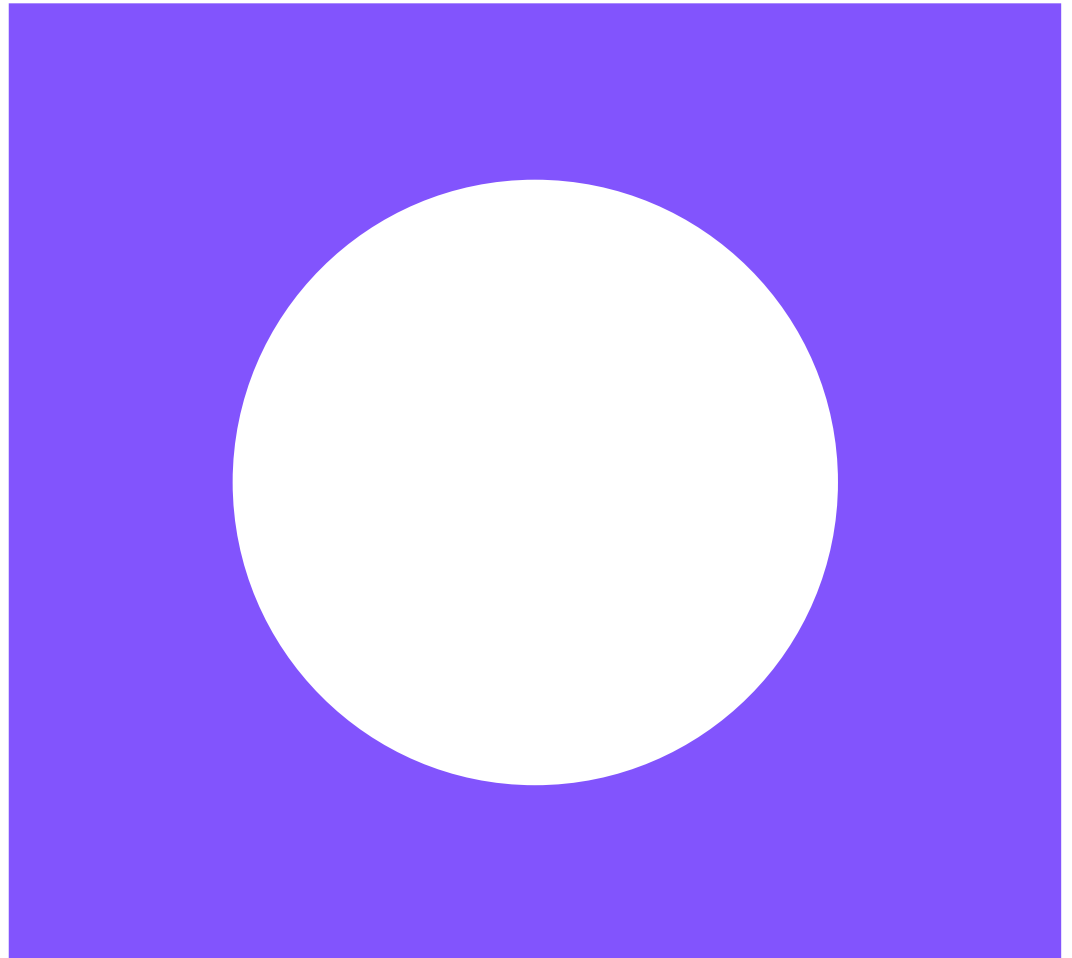




Ates Wind Power

Stakeholder Engagement Plan

June 2025

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Mott MacDonald
Mesa Koz
Sahrayıcedit District
Atatürk Street No. 69 / 255
34734 Kadıköy
İstanbul
Turkey

T +90 (0) 216 766 3118
mottmac.com

Ates Wind Power

Stakeholder Engagement Plan

June 2025

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Executive summary

This Stakeholder Engagement Plan (SEP) has been prepared for Ateş Wind Power (“AWP”, “the Company”) and covers its two facilities located in the Zeytindağ Neighbourhood (Çandarlı facility) and the Bergama Organized Industrial Zone (BOSBI facility) in İzmir Province.

Mott MacDonald was contracted by Maxis Private Equity Portfolio Management A.Ş. (“Maxis”) to conduct an Environmental and Social Due Diligence (ESDD), develop an Environmental and Social Action Plan (ESAP), and prepare a Stakeholder Engagement Plan (SEP) for Ateş Wind Power’s operations in İzmir, Türkiye. This document represents the SEP, which has been developed as part of the ESDD process, drawing on information from documents provided by the Company, a site visit held in March 2025 within the scope of the ESDD study, and in alignment with international requirements and national regulatory frameworks.

The SEP has been prepared in accordance with the World Bank Group’s Environmental and Social Standards (ESS10: Stakeholder Engagement and Information Disclosure) and complies with relevant Turkish national legislation. This includes the Turkish Environmental Impact Assessment (EIA) Regulation (Official Gazette Date/Number: 29.07.2022/31907), the Law on the Right to Information (No. 4982), the Law on the Protection of Personal Data (No. 6698), the Law on the Use of the Right to Petition (No. 3071), and the Regulation on the Principles and Procedures for the Enforcement of the Law on the Right to Information.

The primary objective of this SEP is to facilitate continuous, transparent, and meaningful engagement with key stakeholders, including but not limited to local authorities, public institutions, local communities, suppliers, and other affected or interested parties. This plan is intended to foster a sustainable and participatory approach by integrating stakeholder feedback and addressing their expectations throughout the facilities’ construction and operational phases. Additionally, the Facility staff and the Company employees are also considered key stakeholders, and the SEP encompasses interactions with them as well, including mechanisms such as the internal grievance mechanism.

To achieve above-mentioned goals, the SEP identifies and prioritizes all stakeholders directly or indirectly affected by the constructional and operational activities of the facilities. A variety of engagement methods have been established to maintain open and two-way communication channels. These methods include regular information meetings, a robust feedback mechanism, and a formal grievance management system to capture and respond to concerns in a timely and effective manner. This comprehensive approach ensures that stakeholders remain informed about activities of the Company, and their perspectives and concerns are continuously acknowledged, evaluated, and addressed. Therefore, this SEP provides Ateş Wind Power with an adaptive approach to maintain proactive engagement and foster positive, long-term relationships with all stakeholders.

1 Introduction and Project Summary

1.1 Overview

Ateş Wind Power (referred as “AWP” or “the Company”) has two facilities located in Zeytindağ Neighbourhood (Çandarlı facility) and Bergama Organized Industrial Zone (BOSBI facility).

Çandarlı facility is in operation and covering the manufacturing operations for wind turbine tower and generator. The total facility area is 250,000 m² and total closed area is 33,000 m². There are two main production lines for tower and generator. Office buildings, stock areas, utilities and waste storage areas are also located in this area.

BOSBI facility has recently started its operations and in commissioning stage. It should be noted that construction activities are ongoing simultaneously with commissioning. The main area of production in this facility is manufacturing of mechanical components for wind turbines. The total facility area is 40,000 m² and total closed area is 22,000 m². Welding, metallization and surface coating operations are performed in Block A and Block B. Block C will be used for administrative issues and also designed as training centre for both theoretical and applied trainings.

This document (the SEP) is prepared for the above-mentioned facilities. The purpose of SEP is to promote the Company's approach to stakeholder engagement throughout the facilities' lifecycle. The SEP includes outlining the responsibilities of the Company, contractors, and subcontractors in the implementation of stakeholder engagement activities, including how the Company, contractors, and subcontractors will communicate with stakeholders, how stakeholders can raise their concerns, and provide their feedback to the Company. The SEP has been prepared in line with national legislation and international standards and requirements which are explained in detail in the following sections.

This document represents the SEP which has been prepared within the scope of the ESDD studies of the Project, documents provided by the Company, and in line with the requirements of The World Bank Group Environmental and Social Standards Requirements (ESS10) as well as the Turkish national legislation including the Turkish EIA Regulation (Official Gazette Date/Number: 29.07.2022/31907), Law on Right to Information (No. 4982), Law on Preservation of Personal Data (No. 6698), Law on Use of the Right to Petition (No. 3071), and Regulation on the Principles and Procedures for the Enforcement of the Law on the Right to Information.

1.2 Objectives and Scope of the Stakeholder Engagement Plan

The objective of this SEP is to present a strategic guideline for the stakeholder engagement and consultation activities that will be implemented in a comprehensive and culturally appropriate way. The SEP will follow a gender-sensitive approach during all implementation phases. SEP ensures that communication tools and information sharing mechanism are accessible to the vulnerable groups identified within the scope of the facilities of the Company.

The SEP identifies stakeholder groups that could be affected or may have an interest in the facilities and defines the stakeholder engagement activities to be organized, grievance mechanism to be applied. It is suggested that an Environmental Specialist to be employed by the Company be appointed as Community Liaison Officer (CLO). The primary responsibility for implementation of this SEP will be with the Human Resources Department until the employment is realised.

The Project Company is committed to actualize effective stakeholder engagement as defined in this SEP and in line with the ESS10 requirements.

The Company is committed to follow the Turkish EIA Regulation (Official Gazette Date/Number: 29.07.2022/31907), Law on Right to Information (No. 4982), Law on Preservation of Personal Data (No. 6698), Law on Use of the Right to Petition (No. 3071), and Regulation on the Principles and Procedures for the Enforcement of the Law on the Right to Information in order to achieve an effective SEP.

1.3 Location and Social Area of Influence

As explained above, the Company has two facilities located in Zeytindağ Neighbourhood (Candarlı facility) and Bergama Organized Industrial Zone (BOSBI facility) as demonstrated in Figure 1.1. and Figure 1.2.

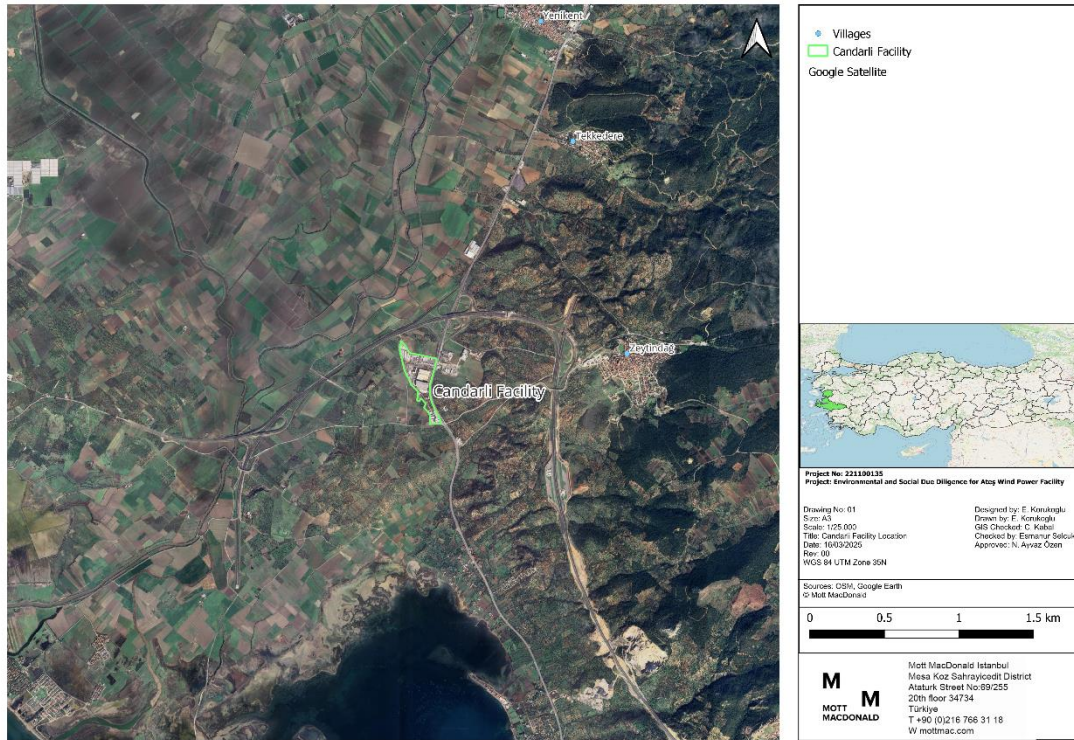


Figure 1.1: Çandarlı Facility

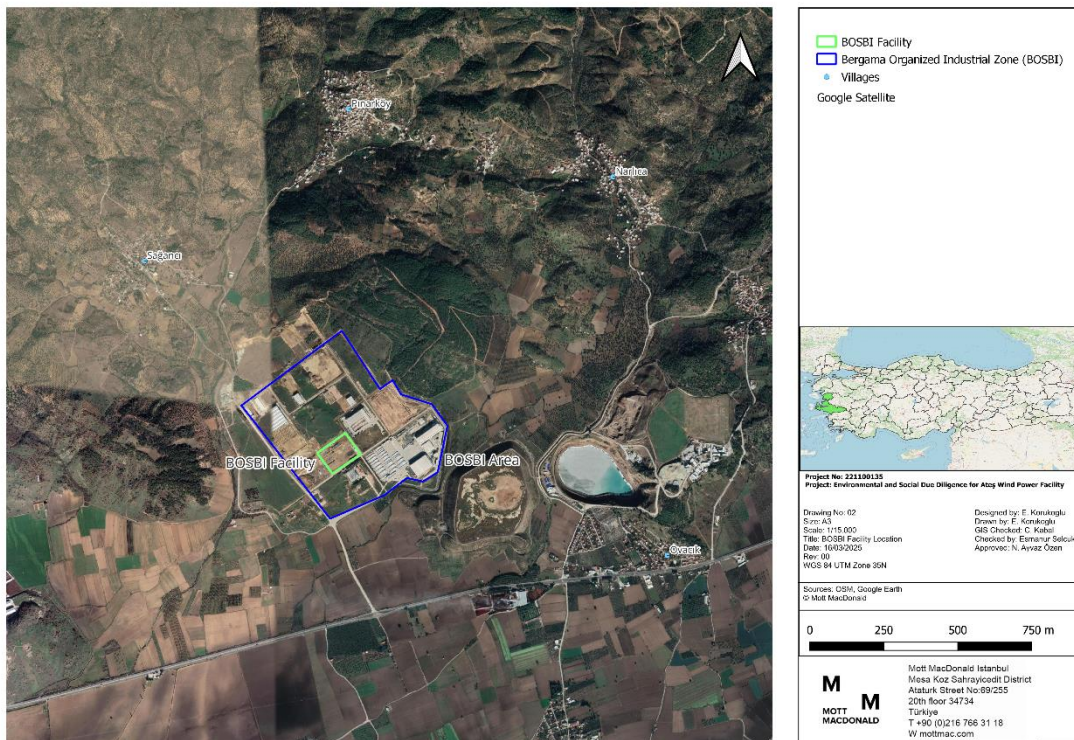


Figure 1.2: BOSBI Facility

The social area of influence (AoI) of the Company covers a total of three neighbourhoods in Bergama district. Ovacık and Sağanca neighbourhoods are approximately 4 km away from the

BOSBİ facility of the Company, and Zeytindağ neighbourhood is approximately 4 km away from the Çandarlı facility. During the site visit held in March 2025 within the scope of the ESDD studies, five residents residing in the Zeytindağ neighbourhood were interviewed. As the site visit was conducted as part of the ESDD study, only a few numbers of local stakeholders were interviewed, and it is acknowledged that this represents a limitation of the SEP.

During the site visit in March 2025, an analysis has been made to assess the social receptors of the facilities during the construction and operation phases separately. Accordingly, the direct social receptors of the Project during the construction phase are as follows:

- Nearby neighbourhoods and business enterprises located in the immediate vicinity of the areas of facilities that are likely to be exposed to increased traffic volume, road safety risks, dust, and noise,
- Local community members who are on the access roads to the areas of facilities and/or use these roads, and are likely to be exposed to increased traffic volume and road safety risks,
- Local community members who may benefit from the Company's local employment opportunities,
- Local community members whose agricultural lands are on the access road to the BOSBİ facility, and are likely to be exposed to dust generated from the construction vehicles,
- Business enterprises that may benefit from the Company's local procurement activities,
- Vulnerable groups who may be in need for essential consultation throughout the construction phase, and
- All construction phase staff employed within the scope of the BOSBİ facility

The social receptors that are estimated to be affected by the Çandarlı and BOSBİ facilities during the operation phase are listed below:

- Nearby neighbourhoods and businesses enterprises in the immediate vicinity of the facilities are likely to experience traffic and road safety risks during the transportation of heavy equipment.
- Local community members who may benefit from the Company's local employment opportunities,
- Business enterprises that may benefit from the Company's local economic activities,
- Vulnerable groups who may be in need for essential consultation within the Company, and
- All operation phase workers employed within the Company

1.4 Potential Project Impacts and Summary of Mitigations

The Çandarlı facility is fully operational, and despite the BOSBİ facility being in a construction phase, it is located in the organised industrial zone. Hence, when looking at the impacts of the Project on resettlement and livelihoods, it is seen that there will be no economic or physical displacement.

During the construction phase of the BOSBİ facility, in terms of the local economy, livelihood sources and employment, there will be numerous procurement opportunities which may be beneficial for the local businesses, enterprises and suppliers in terms of income generation and increase. This can contribute to a certain reduction in unemployment and increase in the welfare of the employed workers' families. In order to support local recruitment and employment opportunities, there will be a local employment and procurement strategy in parallel with the continuous consultation, and engagement with the stakeholders through the Community Liaison Officer (CLO) as defined in the SEP. In addition, the Company will also improve local infrastructural capacity such as increasing the domestic production capacity of clean energy on a country basis during the operation phase.

The Company has a foreign national employee. The document submitted relates to the approval of a work permit for a foreign national employed by the Company. It states that the person knows the Turkish language. During the site visit in Zeytindağ, it was stated that no foreigners live in the neighbourhood or in the vicinity. Based on the results of the site visit, no impact on foreigners is anticipated.

The construction and operation activities of the facilities can have potential of increased noise pollution, traffic congestion, and environmental degradation. These factors can negatively impact the quality of life for all residents, including vulnerable groups¹. In terms of gender aspect, the Company may improve the gender equality through local employment of both women and men as unskilled and semi-skilled workforce residing in the facility affected settlements. Throughout the construction and operational activities, gender-based violence and harassment (GBVH) cases may occur unless preventive measures are taken. To prevent these incidents, mitigation measures are summarized as followed:

- Trainings and Code of Conduct for workers
- Awareness raising activities for the facility affected neighbourhoods
- Specific meetings with women in the facility affected neighbourhoods
- SEP, continuous consultation, and engagement through the CLO
- Community grievance mechanism
- Community Health, Safety and Security Procedure
- Company GBVH Policy

The potential adverse impacts of the facilities during the construction and operation phase in terms of health and safety issues are assessed within the Environmental and Social Due Diligence (ESDD) Report of the Project (i.e., fire/explosion, earthquake, combustible/flammable chemical leakage, environmental spill etc.).

In the context of community health, safety, and security, the risks and impacts to the affected communities, as outlined in ESS4, were assessed during the ESDD. It is the responsibility of AWP to prevent or minimize these risks and impacts, with particular attention to vulnerable groups. However, this assessment was limited due to the absence of a community health, safety, and security management plan and an external grievance mechanism, which are proposed to be developed in the plan.

A main road separates the facilities from residential areas. While there are no residential areas in the immediate vicinity of the BOSBI and Çandarlı facilities, they are surrounded by agricultural land. Although landowners were not interviewed, interviews with residents in the Zeytindağ neighbourhood, where most employees reside, did not reveal any complaints or disturbances near the facility. One complaint was noted from the surrounding neighbourhoods of the BOSBI during the interview with employees in BOSBI. The dust-related complaints have been recorded by official institutions, and local directorates have communicated warnings to the contracted company of the AWP. Despite the construction being located in an organized industrial zone and relatively distant from neighbourhoods, strong regional winds caused dust to spread to surrounding areas. Eventually, in accordance with the grievance, the construction works were put on hold for a short period of time and the wind was allowed to settle. There have been no recurring complaints received from the local community regarding this issue. All

¹ Based on the World Bank Group (2017)'s definition of vulnerable people, this category includes those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so. This will take into account considerations relating to age, including the elderly and minors, and including in circumstances where they may be separated from their family, the community or other individuals upon whom they depend.

grievances will be recorded on the grievance log and the relevant responsible parties and actions will be followed up. Sample grievance log to be utilized by the Company is provided in Appendix 8.3.

Regarding traffic and road safety, noise, communicable and viral diseases, no complaints were identified during the interviews. However, the environmental and social risks and impacts of the Company's planned WPP project will be assessed, considering:

- Traffic and Road Safety
- Shadow Flicker, Blade, and Ice Throw
- Cultural Heritage Study
- Habitat Alteration and Biodiversity Assessment
- Public Access

2 Stakeholder Engagement Requirements

2.1 Overview

Continuous, open, and transparent stakeholder engagement is an essential aspect in projects to ensure sustainability, improved quality, and better implementation. The objective of the stakeholder engagement is successfully managing the risks and impacts on communities, people, groups, businesses, and any other interested parties affected the activities of the Company. Robust stakeholder identification and stakeholder mapping are the very first and significant steps of an effective stakeholder engagement.

Stakeholder engagement provides a mutual communication line between the Company and the stakeholders, which will continue throughout the project lifecycle including construction and operation phases. Different phases of the project can necessitate varying engagement and consultation activities. The Company is responsible for establishing a platform that enables continuous communication and consultation with all stakeholders.

As the international standards and requirements (particularly WBG ESS Guidelines) necessitate, stakeholder consultation and engagement involve the following aspects:

- Identification and analysis of all potentially affected individuals, groups, communities, organizations, vulnerable/disadvantaged individuals, and groups that will be considered as stakeholders,
- Planning the steps for the way stakeholder engagement, information disclosure and meaningful consultation with stakeholders will be held,
- Identification of the issues that remain as a risk or adverse impact for the Company or the stakeholders,
- Formation of a good understanding of facilities of the Company for stakeholders,
- Addressing a grievance mechanism, which is free of manipulation, coercion, and intimidation for long-term communication between the Company and the stakeholders,
- Responding to grievances in a timely manner through the grievance mechanism, and
- Regularly informing the stakeholders about the facilities of the Company.

2.2 Applicable Guidelines and Standards

2.2.1 National Requirements

There are several laws and regulations in force that define terms and conditions to inform and consult the public while conducting certain activities. The ones that would apply to the facilities are as follows:

Constitution of the Republic of Türkiye (Articles 25, 26, 74 and 148)

The Constitution of the Republic of Türkiye is the fundamental document for guaranteeing citizens' freedom of thought and opinion (Article 25). No one shall be compelled to reveal his/her thoughts and opinions for any reason or purpose; nor shall anyone be blamed or accused because of his/her thoughts and opinions. Everyone has the right to express and disseminate his/her thoughts and opinions by speech, in writing, pictures, or through other media, individually or collectively. This freedom includes the liberty of receiving or imparting information or ideas without interference by official authorities (Article 26). In addition, Turkish citizens and foreigners residing in Türkiye, on the condition of observing the principle of reciprocity, have the right to apply in

writing to the competent authorities and the Grand National Assembly of Türkiye about the requests and complaints concerning themselves or the public (Article 74). Everyone may apply to the Constitutional Court because one of the fundamental rights within the scope of the European Convention on Human Rights, which public authorities have violated the Constitution grants provided that ordinary remedies are exhausted (Article 148).

Law on the Right to Information (No. 4982)

Law on the Right to Information 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.

The Law on Use of the Right to Petition (No. 3071)

Citizens of the Turkish Republic are entitled to apply to the Turkish Grand National Assembly and the public authorities by written petition, in respect to their requests and complaints, by Article 3 of the Law on Use of the Right to Petition (Official Gazette dated 01.11.1984 and numbered 3071). Foreigners residing in Türkiye are also entitled to enjoy this right on the condition of reciprocity and using Turkish language in their petitions.

Regulation on Environmental Impact Assessment (EIA) (No. 31907)

This Regulation (published in the Official Gazette dated July 29, 2022, and numbered 31907) was prepared in the context of the Article 10 of the Environmental Law. It aims to prevent the potential destructive environmental impacts and decrease or alleviate the existing environmental impacts of these facilities of companies.

Under the scope of the current Turkish EIA Regulation, several references are made to information disclosure and stakeholder participation. This Regulation on EIA defines the legal obligation to organize a public consultation meeting at the beginning of the national EIA process in Türkiye.

According to this Regulation, the primary objective of the public consultation meeting is to inform and consult the public about the Facility. The Regulation requires the meeting to be conducted in the site and accessible for the stakeholders and interested groups. The date and venue of the meeting need to be approved by the Governor and announced on a local and national newspaper, at least ten days before the meeting.

The amendment to the Regulation in 2022 makes it mandatory to prepare a SEP. This plan shall include how, by which methods and tools, legal/real persons (stakeholders) who may be affected by or have an interest in the Company will be contacted and informed at all stages of the facilities.

2.2.2 International Requirements

The stakeholder engagement and consultation requirements of the Company are assessed and planned by considering the following international standards:

The World Bank Group Environmental and Social Standards Requirements

The main applicable international standard for the Company, The World Bank Group's Environmental and Social Standards (ESS), which recognizes the environment as a public good and considers stakeholder engagement as an essential part of good business practices, corporate citizenship, and a way of improving the quality of projects.

Within this scope, The Company will conform to The World Bank Group's disclosure and stakeholder engagement requirements as outlined in The World Bank Group's Environmental and Social Standards 10 (ESS). ESS10 requirements are indicated below:

ESS10:

- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.
- The Borrower will disclose project information to allow stakeholders to understand the risks and impacts of the project, and potential opportunities. The Borrower will provide stakeholders with access to the following information, as early as possible before the Bank proceeds to project appraisal, and in a timeframe that enables meaningful consultations with stakeholders on project design.
- The Borrower will identify the different stakeholders, both facility-affected parties and other interested parties. Individuals or groups that are affected or likely to be affected by the facilities will be identified as 'facility affected parties' and other individuals or groups that may have an interest in the project will be identified as 'other interested parties'.
- The process of stakeholder engagement will involve the following: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrower will identify those facility-affected parties (individuals or groups) who, because of their particular circumstances, may be disadvantaged or vulnerable. Based on this identification, the Borrower will further identify individuals or groups who may have different concerns and priorities about project impacts, mitigation mechanisms and benefits, and who may require different, or separate, forms of engagement. An adequate level of detail will be included in the stakeholder identification and analysis so as to determine the level of communication that is appropriate for the project.

Where Turkish legislation differs from WB Policies, the more stringent rules will be applied in project implementation.

2.2.3 Applicable Policies and Management Systems of the Company

The Company has an integrated Quality, Health and Safety, Environment and Energy Management Systems and relevant certifications, which are listed below:

- ISO 9001: 2015 - Quality Management System
- ISO 14001: 2015 - Environmental Management System
- ISO 45001: 2018 - Occupational Health and Safety Management
- ISO 50001: 2018 - Energy Management System
- TS EN ISO 14064-1:2018 Greenhouse gases - Part 1: Specification with guidance at the organization level for quantification and reporting of greenhouse gas emissions and removals
- TS EN ISO 3834-2 - Quality requirements for fusion welding of metallic materials - Part 2: Comprehensive quality requirements
- EN 1090-1 Execution of steel structures and aluminium structures - Part 1: Requirements for conformity assessment of structural components
- EN 1090-2 Execution of steel structures and aluminium structures - Part 2: Technical requirements for steel structures
- EN 1090-3: Execution of steel structures and aluminium structures - Part 3: Technical requirements for aluminium structures

In line with these management systems, the Company has an Integrated Management Systems Policy. In addition, the Company has the following policies and management plans, which are disclosed at the Sustainability Report 2023:

Corporate level:

- Sustainability Policy
- Information, Information Systems and Security Policy
- Information Security Management Policy
- Human Rights Policy
- Ethical Principles Procedure

Facility Specific:

- Quality Planning Procedure
- Input Quality Control Procedure

3 Stakeholder Identification and Analysis

3.1 Overview

In line with the definitions of international standards, stakeholders are defined as the individuals or groups who are impacted by the facilities or possess an interest in its outcome. Facilities' impact may be positive or negative and can be direct or indirect.

The first step of the stakeholder engagement is to identify the Company stakeholders. The aim of this identification is to determine each stakeholder group and define their relation to the facilities. It is important to consider their opinions, perspectives, concerns and to ensure successful outcomes.

3.2 Company Stakeholders

Identified stakeholders of the facilities are categorized as external stakeholders (including governmental and non-governmental bodies, mukhtars/residents/local communities, vulnerable/disadvantaged groups, media and universities) and internal stakeholders (all Facility staff, including contractors, subcontractors, and suppliers) which are given in Table 3.1 through Table 3.4 below. Disclosure and consultation activities to be implemented throughout the lifetime of the facilities is outlined in Table 4 together with the proposed implementation timetable.

Table 3.1: External stakeholder list for governmental authorities

GOVERNMENTAL BODIES

Level	Organization	Relation to the facilities
National	Ministry of Energy and Natural Resources	Ministry of Energy and Natural Resources and its relevant departments have regulatory functions relation to the facilities and its components.
	Energy Market Regulatory Authority (EPDK)	EPDK is one of the key stakeholders of the Company in relation to the facility scope and components in general.
	Turkish Electricity Transmission Company (TEIAS)	TEIAS is a key stakeholder for various co-operations on electricity storage facilities
	Ministry of National Defence	Ministry of National Defence is a significant stakeholder since securing the facility areas is crucial.
	Ministry of Environment, Urbanization and Climate Change (MoEUCC)	MoEUCC has regulatory functions in relation to the facilities such as environmental impact assessment permits and environmental permitting.
	MoEUCC, General Directorate of EIA, Permit and Audit	
	MoEUCC, General Directorate of Environmental Management	
	MoEUCC, General Directorate of Infrastructure and Urban Transformation	
	MoEUCC, General Directorate of Spatial Planning	
	MoEUCC, General Directorate of Protection of Natural Assets	
	Ministry of Transport and Infrastructure (MoTI)	

GOVERNMENTAL BODIES

Level	Organization	Relation to the facilities
Provincial	MoTI General Directorate of Infrastructure Investments	MoTI may have specific views regarding evaluation of the facilities.
	MoTI General Directorate of Highways	
	Ministry of Labour and Social Security (MoLSS)	MoLSS may have specific views on labour and working conditions, and health and safety of the facility personnel.
	MoLSS, General Directorate of Labor	
	MoLSS, General Directorate of Occupational Health and Safety	
	Regional Council for the Conservation of Cultural Property	This organization is an important stakeholder to identify and clarify the archaeological potential of the facility areas.
	Governorship of İzmir	The governorship representing the national government is the highest authority in the province.
	İzmir Investment and Coordination Committee Directorate	This organization coordinates all kinds of investment and construction works to be carried out by ministries and other central government organizations in the provinces.
	İzmir Metropolitan Municipality	The metropolitan municipality and its relevant departments will have responsibilities in relation to the facilities.
	Directorate of Environmental Protection and Control	
	Directorate of Zoning and City Planning	
	Directorate of Transportation	This organization may provide specific views on labour and working conditions, and health and safety of facility personnel.
	İzmir Governorship Provincial Directorate of Social Security Institution	
	İzmir Governorship Provincial Directorate of Environment, Urbanization and Climate Change (PDoEUCC)	PDoEUCC has regulatory functions related to the facilities such as environmental impact assessment permits and environmental permitting.
	İzmir Provincial Directorate of Environment and Urbanization	This organization has regulatory functions in relation to the facilities such as environmental impact assessment permits and environmental permitting.
District	Ministry of Transportation and Infrastructure 2 nd Regional Directorate of Highways	This organization has regulatory functions in relation to the potential impacts on highways.
	İzmir Cultural Heritage Preservation Regional Board Directorate	This organization is an important stakeholder to identify and clarify the archaeological potential of the facility areas.
	İzmir Water and Sewer Administration (İZSU)	This organization may provide an opinion related to water/wastewater infrastructure of the facility areas.
	İzmir gas supplier and distribution companies (İzmirGaz)	These organizations may provide an opinion related to gas supply and distribution infrastructure of the facility.
	Bergama District Governorship	The local governorship, central municipality and their related departments located in the facility areas are stakeholders regarding obtaining relevant permits, approvals during planning, and construction and operation phases of the facilities.
	Bergama District Municipality	
	Directorate of Zoning and Urbanisation	
	Directorate of Civil Works	
	Directorate of Plan and Project	
	Directorate of Cleaning Works	
	Directorate of Municipal Police	
	Bergama District Directorate of Health	

GOVERNMENTAL BODIES

Level	Organization	Relation to the facilities
	Bergama District Directorate of National Education	
	Bergama Organized Industrial Zone	Bergama Organized Industrial Zone is an important stakeholder as its regulations are binding and it has regulatory functions on issues such as permits and audits related to the facilities.

Table 3.2: External stakeholder list for non-governmental bodies

NON-GOVERNMENTAL BODIES

Level	Organization	Relation to the facilities
National, Provincial and District	Energy Storage Industries Association of Türkiye	These foundations, associations, and other chambers in the list may provide their specific views related to the facilities.
	Türkiye Foundation for Combating Erosion, Afforestation and Protection of Natural Assets (TEMA)	
	Environmental Protection and Research Foundation (ÇEV-KOR)	
	Turkish Environmental Protection Foundation (TUÇEV)	
	Turkish Nature Conservation Association	
	Foundation for the Protection and Promotion of Environmental and Cultural Values (ÇEKÜL)	
	World Wide Fund for Nature (WWF) Türkiye	
	Türkiye Exporters Assembly	
	Energy Investors Association (GÜYAD)	
	Energy Industrialists & Business Association	
	Association of Generator Industrialists and Power Systems	
	Electromechanical Industrial Association	
	Renewable Energy Research Association	
	Resource, Environment and Climate Association (REC)	
	Ecological Research Society (EKAD)	
	Greenpeace Akdeniz Türkiye	
	Association for Sustainable Economics and Finance Research (SEFIA)	
	Bergama Chamber of Agriculture	
	Bergama Chamber of Commerce	
	Bergama Chamber of Merchants and Craftsmen	
	İzmir Industrialists and Businesspeople Association	

Table 3.3: Other external stakeholder groups

STAKEHOLDER GROUPS

Level	Group	Relation to the facilities
Mukhtars/Residents/Local communities	The mukhtars and residents of the Zeytindağ, Ovacık, and Sağanca neighbourhoods	Neighbourhoods are key stakeholders considering potential impacts of the facilities.
	Local businesses and enterprises	
Vulnerable/Disadvantaged groups	Women	Vulnerable groups are key stakeholders considering potential impacts of the facilities.
	Students	
	The elderly	
	People with disabilities	
	Unemployed people	
	Syrians under temporary protection (SuTP)	
	Refugees under international protection (UIP)	
Customers	Beneficiaries of company services both at national and international level	Customers are key stakeholders considering their direct influence on the

STAKEHOLDER GROUPS

Level	Group	Relation to the facilities
		Company's success and profitability.
Neighbouring companies at Bergama Organized Industrial Zone	AFG Construction	Neighbouring companies are key stakeholders considering potential impacts of the facilities.
	Bergama Industry	
	LM Wind Power	
	Bergama Organized Industrial Zone Transformer Station	
Media	Local, regional, and social media (including newspapers, TV stations, social media channels)	It is important to engage with local and regional media organizations for effective public disclosure and consultation.
Universities	İzmir Ege University	Universities are key stakeholders when research needs to be conducted within the scope of the facilities.
	İzmir Dokuz Eylül University	
	İzmir Ekonomi University	
Other potentially affected local social institutes	Schools (at primary, secondary and high school levels)	It is essential to ensure that the social environments that pose a significant place for community health, safety and security issues (i.e., hospitals, fire stations) and/or where key stakeholders utilize/ spend their time are operating properly.
	Mosques	
	Local coffeeshops	
	State Hospitals	
	District Fire Stations	

Table 3.4: Internal stakeholder list

INTERNAL STAKEHOLDERS

Level	Organization	Relation to the facilities
Internal stakeholders	Company staff	These groups are one of the key stakeholders in terms of continuation of the facility activities in compliance with the international standards.
	Contractors and subcontractors and their employees	
	Suppliers and their workers	

4 Stakeholder Engagement and Consultation Program

4.1 Overview

Stakeholder engagement is an ongoing component of the Company that needs to continue throughout the pre-construction, construction, and operation phases. The stakeholder engagement activities conducted will follow a local community member-centred and structured framework in line with the international requirements.

The stakeholder engagement programme given in this section of the SEP summarizes key planned stakeholder engagement and consultation activities during the pre-construction, construction, and operation phases. The programme will be reviewed on a regular basis and when needed during all phases in order to ensure that it remains valid and meets the needs of the facilities. Main stakeholder engagement tools are provided below:

- Formal and informal face-to-face meetings (individual and collective): This includes stakeholder meetings planned by the Project or requested by stakeholders.
- Project Owner Website: Public project announcements, documents, reports, etc.
- Grievance mechanism: This specifically targets directly affected stakeholders. The details of the mechanism in question will be clearly introduced to the stakeholders within its scope.
- Media promotions: Meeting participation invitations, information sharing, etc.

The Company will follow a gender-sensitive approach, which is also reflected to the SEP and its content on the consultation activities. Gender aspect will be considered in the implementation of the SEP through a gender inclusive and participatory point of view.

4.2 Community Liaison Officer (CLO)

It is recommended that an Environmental Specialist with relevant experience and background to provide consistent expertise is employed by the Company and this person will also act as a Community Liaison Officer (CLO) to be the main point of contact for the stakeholders. Accordingly, disclosure, consultation and engagement activities of the Company will also be managed by the CLO on the basis of the stakeholder engagement and consultation program defined in the SEP and Table 4 4.2 below. The CLO will be responsible for stakeholder engagement activities during both construction and operation phases. Additionally, the CLO will also be responsible for registering the stakeholder engagement and consultation activities into the facility-specific consultation log. Sample consultation log is provided in 8.1.

The Company will be involved in the stakeholder engagement and consultation activities when necessary.

CLO will be the primary responsible for stakeholder engagement and consultation program. When necessary, the CLO will work in an integrated manner with the relevant units (e.g. Human Resources, Operational Health and Safety) depending on the context. Detailed information regarding is provided in Section 6.

4.3 Stakeholder Activities

The Company is in open communication with locals, institutions, universities, and NGOs. During the site visit, it was noted that collaboration with universities has facilitated the creation of employment opportunities for recent graduates. These initiatives include participation in career fairs and internship programs. The Company's previous stakeholder activities are presented in Table 4. below based the documents that are provided and findings of the interviews with HR Department.

Table 4.1: The Company's Stakeholder Activities
Stakeholder Activities²

2022	2023	2024
Internal: - Annual Employee Satisfaction Survey - Service Award Ceremony - Celebration of International Women's Day External: - Drawing contest among AWP' children of employee - Sponsored the Bergama Municipality Youth and Sports Club	Internal: - Annual Employee Satisfaction Survey - Employing Women in Production Project - Planning the 'Sustainable Life Club' - Celebration of International Women's Day External: - Sponsored the Bergama Municipality Youth and Sports Club - Donation for education: ITU Alumni Education Foundation, Sabancı University Earthquake Scholarship Fund, Izmir Institute of Technology, and Darüşşafaka Society, Bergama Bakırçay MTAL Parent-Teacher Association, - Donation for nature: Tema Foundation - Support the NGOs: Turkish Wind Energy Association (TUREB), Energy Industrialists and Business Association (ENSIA), Izmir Helps (earthquake recovery campaign)	Internal: - Annual Employee Satisfaction Survey - Employing Women in Production Project - Sustainable Life Club - Celebration of International Women's Day External: - Bergama Women's Volleyball Team Sponsorship, - Welding School, - Tema Foundation Seedling Donation - In-kind and cash aid support for earthquake victims affected by the Hatay earthquake - Communication with mukhtars to always evaluate local human resources and prioritize local employment, except for positions requiring special competence in recruitment. - Donation for Education: Darüşşafaka Society, Sabancı University Earthquake Scholarship Fund, İYTE, İTÜ Alumni Education Foundation - Support the NGOs: ENSIA Board of Directors, Turkish Wind Energy Association

The HR department has listed some of the institutions and associations that the Company is a member these are as follows:

- Board membership in the Energy Industrialists and Businessmen's Association,
- Alternate audit board membership in the Turkish Wind Energy Association,
- Bergama Chamber of Commerce,
- Turkish Exporters Assembly and Aegean Region Chamber of Industry.

The latest consultation held on 4 June 2025 with participants including the Company's Senior Administrative Affairs Specialist, the mukhtar of Zeytindağ neighbourhood, the mukhtar of

² The findings based on AWP Sustainability Reports (2022-2023) and the interviews with HR Department for activities in 2024.

Sağancı neighbourhood, and three local farmers (please see Appendix 8.6). The following topics were discussed:

- The type of the Çandarlı facility, the products manufactured, production processes, land use, employment targets, and local contribution plans. Environmental and social impacts were presented in detail, including air emissions and control systems, wastewater management, water usage, treatment processes, noise impacts, traffic impacts, and social impacts.
- Local farmers stated that there is no adverse impact on their livelihoods and agricultural activities.
- The village residents and mukhtars expressed their satisfaction with the employment opportunities provided by the AWP. Discussions were also held on how the local employment could be further enhanced.
- Local business owners noted that the return of residents to the villages had a positive effect on local economic activity and that their businesses were performing better than in the past due to increased mobility.
- No issues related to air pollution, noise, or traffic impacts were reported during the meeting.

4.4 Stakeholder Engagement and Consultation Program

The proposed implementation timetable and responsibilities for stakeholder engagement for both the construction and operation phase activities of the Company is outlined in Table 4 below.

Table 4.2: Stakeholder engagement and consultation program of the Company

No	Stakeholders	Issues to be consulted/discussed	Communication methods	Phase and frequency	Responsible
Local Communities					
1	Residents in the facility affected neighbourhoods (Zeytindağ, Ovacık, and Sağanca)	Provide information about the activities of the facilities when potential impacts might occur, communication channels with stakeholders, and grievance mechanism of the facilities, provisions to prevent the risks of GBVH	- Face-to-face consultation meetings - Regular visits - Disclosure of SEP and other related Company documents	Quarterly (and when needed) during construction³	CLO/Appointed staff
	Local Businesses and Enterprises	- Inform about the local employment and procurement - Inform about the Company activities involving community health and safety risks (i.e., transportation of heavy equipment)	- Website announcements - Social media announcements - Announcements through posters/ billboards/ press release	Annually during operation	The Company
2	Mukhtars of the facility affected settlements (Zeytindağ, Ovacık, and Sağanca)	Provide information about the facilities' development stages, potential impacts, communication channels with stakeholders, and grievance mechanism of the Company, provisions to prevent the risks of GBVH	- Face-to-face consultation meetings - Regular visits - Disclosure of SEP and other related documents	Quarterly (and when needed) during construction	CLO/Appointed staff
		- Inform about the local employment and procurement - Inform about the Company activities involving community health and safety risks (i.e., transportation of heavy equipment), information regarding plan of WPP Project	- Disclosure of SEP and other related documents - Website announcements - Social media announcements - Announcements through posters/ billboards/ press release	Annually during operation	The Company

³ The construction activities are referred in BOSBI

No	Stakeholders	Issues to be consulted/discussed	Communication methods	Phase and frequency	Responsible
3	Vulnerable groups (Women, elderly people, students, people with disabilities, unemployed people, SuTP, refugees UIP)	- Provide information about the facilities' development stages, potential impacts, communication channels with stakeholders, informing about grievance mechanism of the Company, provisions to prevent the risks of GBVH - Specific interest to receive their grievances (if there are any) since they may not be able to use the grievance channels - Inform about the local employment and procurement - Inform about the Company activities involving community health and safety risks (i.e., transportation of heavy equipment)	- Face-to-face consultation meetings - Regular visits - Disclosure of SEP and other related Company documents - Website announcements - Social media announcements - Announcements through posters/ billboards/ press release - Specific focus group meetings held with women groups and other particular vulnerable groups	- Every three months - Annually during operation	- CLO/Appointed staff - The Company
4	Other potentially affected local social institutes (Schools, mosques, local coffeshops)	- Provide information about the facilities' development stages, potential impacts, communication channels with stakeholders, and grievance mechanism of the Company, provisions to prevent the risks of GBVH - Inform about the local employment and procurement - Inform about the Company activities involving community health and safety risks	- Face-to-face consultation meetings - Regular visits - Disclosure of SEP and other related documents - Website announcements - Social media announcements - Announcements through posters/ billboards/ press release	- Quarterly (and when needed) during construction - Annually during operation	- CLO/Appointed staff - The Company
5	Customers	Provide information about the facilities' development stages, potential impacts, communication channels with stakeholders, and grievance mechanism of the Company, provisions to prevent the risks of GBVH	- Face-to-face consultation meetings - Regular visits - Disclosure of SEP and other related documents - Website announcements	When needed during construction and operation	- CLO/Appointed staff - The Company
6	Neighbouring companies at Bergama Organized Industrial Zone	Provide information about the facilities' development stages, potential impacts, and grievance mechanism of	- Face-to-face consultation meetings - Regular visit	Quarterly (and when needed) during construction	- CLO/Appointed staff - The Company

No	Stakeholders	Issues to be consulted/discussed	Communication methods	Phase and frequency	Responsible
		- the Company, provisions to prevent the risks of GBVH - Inform about the local employment and procurement - Inform about the Company activities involving community health and safety risks	- Disclosure of SEP and other related documents - Website announcements - Social media announcements - Announcements through posters/ billboards/ press release	Annually during operation	
Governmental Bodies					
6	Governmental bodies and stakeholders at national level	- Conduct consultation on facilities' construction and operation activities - Provide information on potential impacts of the facilities as well as on the grievance mechanism of the Company	- Face-to-face consultation meetings - Regular visits - Disclosure of SEP and other related documents - Correspondence	- Annually during construction - When needed during operation	CLO/Appointed staff The Company
7	Governmental bodies and stakeholders at provincial and district level	- Conduct meetings and correspondence for permits, consultation on the construction and operational stages of the Company - Provide information on environmental and social impacts of the facilities, grievance mechanism	- Face-to-face consultation meetings - Regular visits - Disclosure of SEP and other related documents - Correspondence	- Quarterly during construction - Annually during operation	- CLO/Appointed staff - The Company
8	District municipalities	- Conduct meetings and correspondence for permits, consultation on the facilities - Provide information on environmental and social impacts of the facilities, Company grievance mechanism - Organized meetings for grievances reported to the municipal units and receiving opinions and recommendations	- Face-to-face consultation meetings - Regular visits - Disclosure of SEP and other related documents - Correspondence	- Quarterly during construction - Annually during operation	- CLO/Appointed staff - The Company
Universities					
9	Universities	- Conduct consultation on construction and operational stages of the facilities - Organize meetings about the research if needed to be conducted within the scope of the facility activities	- Face-to-face consultation meetings - Regular visits - Disclosure of SEP and other related documents	When needed during construction and operation	- CLO/Appointed staff - The Company

No	Stakeholders	Issues to be consulted/discussed	Communication methods	Phase and frequency	Responsible
		Provide information on possible impacts of the Company activities, information on the grievance mechanism of the Company	- Website announcements - Correspondence		
NGOs					
10	NGOs	Provide information about the Company's potential impacts, communication channels with stakeholders, and grievance mechanism of the Company	- Face-to-face consultation meetings - Regular visits - Disclosure of SEP and other related documents - Website announcements - Social media announcements - Announcements through posters/ billboards/ press release	When needed during construction and operation	- CLO/Appointed staff - The Company
Media					
11	Media	- Provide information about the Company's developments and potential impacts, communication channels with stakeholders, and grievance mechanism of the Company - Engage with local and regional media organizations for effective public disclosure and consultation	- Face-to-face consultation meetings - Regular visits - Disclosure of SEP and other related documents - Website announcements - Social media announcements - Announcements through posters/ billboards/ press release	When needed during construction and operation	- CLO/Appointed staff - The Company
Internal Stakeholders					
12	Company Staff Contractors and subcontractors and their employees	Provide information about the updates and changes in operations with regard to labour rights, information on contracts, code of conduct, including provisions for GBVH	- Trainings - Face-to-face consultation meetings - Disclosure of SEP and other related documents - Announcements through posters/	- Monthly during construction - When needed during operation	The Company and relevant departments (i.e., Human Resources Department)

No	Stakeholders	Issues to be consulted/discussed	Communication methods	Phase and frequency	Responsible
	Suppliers and their workers	● Disclose the grievance mechanism of the Company	- billboards/ press release ● Announcements on the facility areas		

5 Grievance Mechanism

5.1 Overview

The Company is required to establish an effective and accessible grievance mechanism as a part of the stakeholder engagement, information disclosure and consultation. The aim of the grievance mechanism is to provide channels that are free of manipulation, coercion and intimidation in which local community members can report their requests, concerns and grievances regarding the facilities and its impacts. Responding to grievances and resolving them in a timely, proactively, unbiased, effective, and efficient manner is essential according to the international standards and requirements on stakeholder engagement. Specifically, it provides a transparent and credible process for fair and sustainable outcomes. By this way, trust and cooperation could be mutually developed among the stakeholders and the Company through corrective actions. Main components of a successful grievance mechanism also include anonymity, confidentiality, and transparency principles.

5.2 Company Grievance Mechanism

In order to ensure compliance with ethical rules of the Ethical Principles of the Company and establish whether a certain act is in compliance with ethical standards, Ethics Committee has been established within the Company. The Ethics Committee consists of the relevant Factory Director, HR and Management Coordination Director, Finance Director, and HR Manager. The HR and Management Coordination Director chairs the committee. The committee convenes as soon as possible upon receiving consultation requests or complaints, initiated by at least one member via email or upon request by the chair or a Board member.

In case of a violation of, or a suspicious act that may violate, ethical rules, communication channel etik@atescelik.com is used to notify. The Company is committed to treat all notifications confidentially and protect informant's rights. Where such notification involves any member of the Ethics Committee, the notification is made to other members of the Ethics Committee or directly to the Board of Directors.

However, issues and cases that can be notified to the Ethics Committee are constrained with ethical violations. In order to cover all sorts of requests and complaints apart from the ethical violations, there are a number of principles that the Company will apply to the Company's grievance mechanism in general. These principles can be summarized as follows:

- There will be a formalized and written Grievance Mechanism Procedure that involves the principles of the mechanism (including anonymity), available channels, defined timeframes for acknowledgement of the receipt of complaints and subsequent resolution, sample subjects that describes the type of grievance as per the identified Company impacts (i.e., dust, gender-based violence and harassment (GBVH), labour management, and traffic), and management and resolution process together with the assigned responsible Company staff.
- Grievance mechanism will be committed to confidentiality and anonymity. Grievance channels both online and offline will be enabled to receive anonymous applications.
- It is important to provide appropriate working environment where all internal and external stakeholders can easily report any GBVH-related grievance in a safe and confidential way when they need. GBVH cases will be registered and processed as a part of the current grievance mechanism. However, they will be approached in a more sensitive way and in an immediate time manner through ensuring confidentiality, non-retaliation, protection, and supervision of victims, and utilize legal expertise when needed.

5.3 External Grievance Mechanism

The Project Company will appoint a CLO for the Company, who will undertake and supervise engagement with all stakeholders in relation to the Company and use available resources to ensure that the relevant activities are conducted effectively. Other responsibilities of the CLO are as follows:

- Conducting stakeholder engagement and disclosure activities with stakeholders
- Following the grievances and requests from registration through the resolution process
- Awareness raising campaigns among the workforce of facilities on the stakeholder engagement and grievance mechanism principles
- Responsibility for the preparation of the facility-specific grievance and consultation logs to be used during internal/external reporting
- Responsibility for the preparation of the facility-specific stakeholder engagement and consultation reports to be shared internally and with the Lenders
- Informing the relevant managers of the Company for development and implementation of additional measures, when necessary, in order to resolve community-related issues, including measures aimed at resolving non-closed grievances
- Coordinating with parties for proper implementation of the SEP

External stakeholders can use the grievance mechanism through the following channels:

- Verbal statements during face-to-face meetings/visits (to the CLO)
- Through e-mail or phone calls to the Ethical Principles Notification Line
- Petitions
- Communication Form on the Company website
- Posters that are hung in common areas of the facility affected neighbourhoods, indicating what the clear communication channels are.
- E-mails to the Company

In addition, people who wishes to submit an anonymous grievance will be able to use abovementioned channels (e-mail, phone call etc.).

Should the Company be unable to resolve a complaint, or if the stakeholder is not satisfied with the outcome, the Company may consider seeking advice from other independent parties. Applicants always have the right to appeal to local or relevant legal authorities for a solution with which they are not satisfied. The steps listed below summarize the external grievance mechanism process:

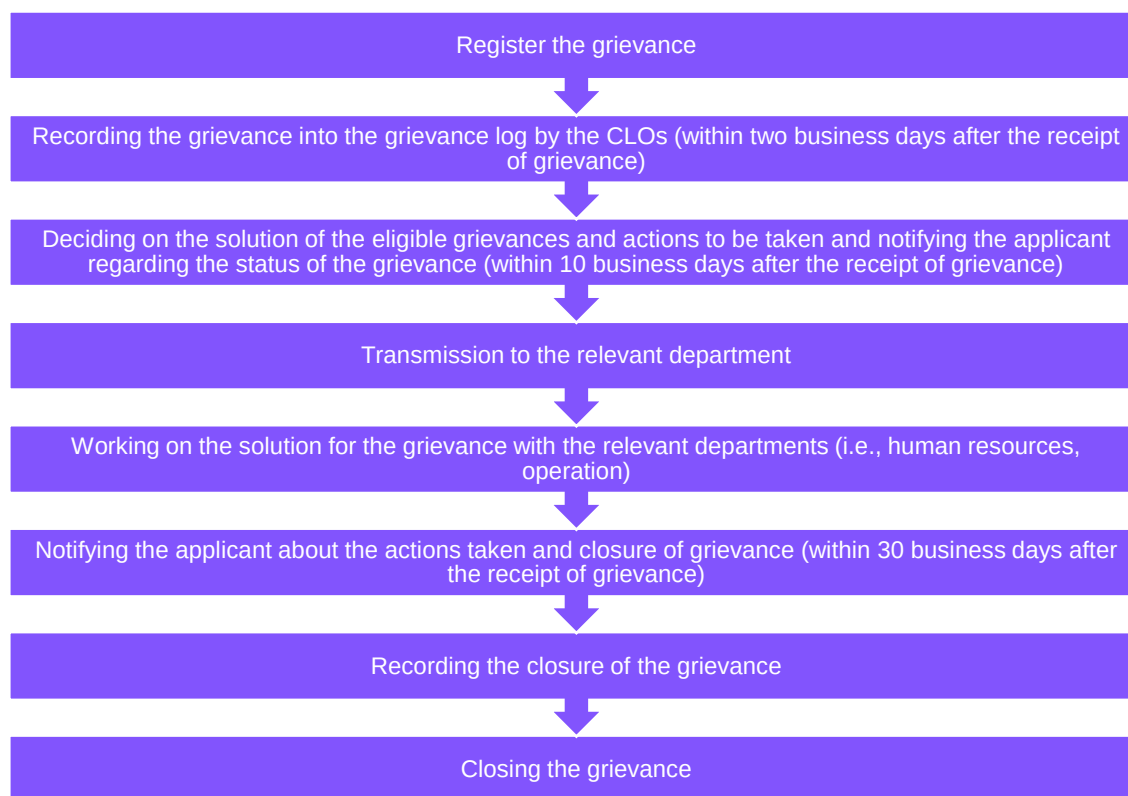


Figure 5.3: Steps of the External Grievance Mechanism

Sample grievance log to be utilized by the Company is provided in Appendix 8.3.

5.4 Internal Grievance Mechanism

Internal grievance mechanism covers the grievances of all employees of facilities including subcontractors working under the Company. Internal grievance channels include ethical hotline, e-mail address, an online form, employee committee meetings, reporting grievances to the managers and employee representatives verbally or in a written way. As with the external grievance mechanism, there will be grievance boxes located in the facilities for all employees and subcontractors working under the Company. The Human Resources department will be the main implementation body for the internal grievance mechanism of the Company.

The following will be applied for all grievance channels for the successful implementation and management of internal grievance mechanism:

- All grievances will be allowed to be anonymous to protect informant's confidentiality and rights.
- Grievances will be classified and prioritized depending on their subjects while registering to the grievance log. Accordingly, resolution period for the grievances with high priority will be 7 days after the receipt of the grievance. For the grievances with medium priority, it is 15 days and the grievances that are prioritized as low can be resolved within 30 days.
- After the grievances are successfully closed and the corrective actions are taken, the complainant will be notified directly and complaints deemed necessary and affecting all employees will be announced on the notice board.

In summary, all AWP staff including subcontractors working for facilities will be able to report their grievances (including anonymous ones) through one-to-one meetings, petitions, telephone

calls, e-mails, online forms, grievance boxes, and collective meetings. The Company aims at creating a positive working environment based on open and continuous communication.

5.5 Grievance Mechanism Channels

The channels listed below can be used for receiving grievances.

Grievance Mechanism Channels

- Official letter and/or petition to: Zeytindağ Mahallesi 2208 Sokak No:1 35720 Bergama/İzmir
- The corporate e-mail address: info@atescelik.com
- Phone number of the Çandarlı Facility: +90 (232) 877 22 24
- CLO contact information: (TBD)
- Website communication form: <https://ateswindpower.com/iletisim/>

Ethical Violation Declaration Channel

- E-mail address: etik@atescelik.com

Presidential Communications Center (CIMER)

- Website: <https://www.cimer.gov.tr/>
- Phone number: 150

Foreigners Communication Center (YIMER)

- Website: <https://yimer.gov.tr/>
- Phone number: 157

5.6 Türkiye Green Fund Grievance Mechanism⁴

As Investment Committee members, TSKB and Maxis will have separate and inclusive Grievance Redress Mechanisms in place to receive complaints from stakeholders of the Fund via website, the Fund specific e-mail or phone call. The grievance mechanisms and those communication channels are defined below.

TSKB Workers' Grievance Mechanism:

Employees have the right to submit suggestions, express concerns and grievances related to the workplace, and to file complaints and lawsuits due to the administrative actions and procedures applied to them by their managers or the workplace. In that sense, TSKB has an internal grievance mechanism for its own employees which can also be reached anonymously and transparently. All necessary information about the communication channels which allows the employees to convey their grievances/suggestions about the TSKB and the working conditions are placed on TSKB's web-site. The grievances/suggestions are received, evaluated and closed by Human Resources Department in 30 days after the application is made and employees are informed about the taken action.

Maxis Workers' Grievance Mechanism:

On Maxis side, a similar procedure is in place. There is a Grievance Committee consisting of General Director, Deputy Director General and Coordinator to manage the procedure. The Committee duties also cover to hear, investigate, and resolve any complaint, grievance, or conflict raised by employees. However, Maxis is required to inform TSKB as soon as receives a grievance regarding the TGF since TSKB is leader of the Investment Committee. Then TSKB will implement its grievance procedure to solve any complaint raised.

⁴ Stakeholder Engagement Plan, TSKB (2023) Retrieved from <https://www.tskb.com.tr/en/turkiye-green-fund> on 02 April 2025

Grievance Channels

TSKB

- Web site: <http://www.tskb.com.tr/en/about-us/tskb-contact-form>
<http://www.tskb.com.tr/tr/hakimizda/tskb-iletisim-formu>
- E-mail address: tgf@tskb.com.tr
- Phone number: +90 212 334 50 50

Maxis

- Web site: <https://www.maxisgs.com/iletisim.html>
- Phone number: +90 (212) 283 51 13

5.7 Gender-Based Violence and Harassment (GBVH)

Gender-based violence and harassment is defined as and harassment directed at persons because of their sex or gender, or affecting persons of a particular sex or gender disproportionately. It includes acts that inflict physical, mental or sexual harm or suffering, threats of such acts, coercion and other deprivations of liberty⁵.

AWP emphasized the Company's gender-sensitive approach in the Sustainability Report, 2023. The report indicates that the Company integrates the principle of social equality and diversity in its corporate culture and organize awareness-raising trainings to provide equal employment without gender discrimination. In addition to these principles and policies, there are some precautions and procedures in order to prevent GBVH in the Company:

- The grievance mechanism will allow for anonymous complaints to be registered and assessed. This is especially critical for reporting any GBVH related complaint. GBVH cases are recorded and analysed accordingly.
- The Grievance Mechanism process have an inclusive system designed to deal with all types of grievances. To ensure the safety, confidentiality and comfort of the victims or survivors of GBVH, it is ensured that there are female employees hired by the Company for various roles, as per the skill and experience requirements.
- The Company identify focal points of contact who will undergo detailed training on these issues and will train all staff gradually. Then, specially trained will also be assigned within grievance mechanism to handle GBVH-related grievances in a better way through ensuring confidentiality, non-retaliation, protection and supervision of victims.
- The CLO of the Company will be in charge of interacting with grievances reported by the community members, in other words, all grievances from external stakeholders. Until a CLO is appointed HR will be in charge of this responsibility.
- Whenever GBVH is reported, the Company will draw on GBVH, child protection and, where necessary, legal expertise to ensure that the process is carried out in a sensitive and confidential manner, using only trained investigators to carry out investigations.
- The Company will resolve reported GBVH incidents in a timely, fair, and thorough manner. The approach will be identifying and addressing systemic issues that may contribute to GBVH in the workplace.

Remediation measures are also an essential part of GBVH policy. Appropriate support and remedies should be provided when incidents occur. Remediation measures will be designed to restore the dignity, respect, and safety of the victim/survivor and to ensure the accountability of the perpetrator. In this scope, survivor of GBVH will be provided with necessary supports such

⁵ILO, **Addressing gender-based violence and harassment in a work health and safety framework** (2025)
Retrieved from: <https://webapps.ilo.org/static/english/intserv/working-papers/wp116/index.html#ID0E2EAC>
on 19 March 2025

as counselling services, medical assistance, legal advice, and other resources. In İzmir, individuals who face with any kind of GBVH can apply the following institutions⁶ for medical, legal and psychological support:

- 112
- Public Prosecutor's Office
- Family Court
- Violence Prevention and Monitoring Centers (ŞÖNİM)
- İzmir Bar Association
- Provincial Directorates of Family, Labor and Social Services
- Women's organizations
- Women's Counselling Centers of Municipalities
- Hospitals
- Social Service Centers
- District Governorship/Governorship

⁶ https://evicisiddet.adalet.gov.tr/Ne_Yapabilirim.html

6 Resources and Responsibilities

The Company will have the overall responsibility and commitment to actualize effective stakeholder engagement as defined in this SEP and in line with the WBG ESS Guidelines requirements. It is suggested that an Environmental Specialist to be employed by the Company be appointed as CLO with the following responsibilities:

- Conducting external stakeholder engagement and disclosure activities with stakeholders
- Following the grievances and requests from registration through the resolution process
- Responsibility for the preparation of the facility-specific grievance and consultation logs to be used during external reporting
- Responsibility for the preparation of the stakeholder engagement and consultation reports to be shared internally and with the Lenders
- Informing the relevant managers of the Company for development and implementation of additional measures, when necessary, in order to resolve community-related issues, including measures aimed at resolving non-closed grievances
- Coordinating with parties for proper implementation of the SEP.

Factory Director:

- Holding regularly scheduled meetings with the CLO to supervise and evaluate the quality and impact of stakeholder engagement activities.
- Conducting monthly meetings to address and monitor any complaints. Furthermore, holding meetings with the headquarters to tackle high-level complaints and explore holistic solutions.
- Determining and allocating the necessary resources for effective implementation of this SEP
- Evaluation of the compliance of the facilities' stakeholder engagement and consultation activities with national legislation and international standards

HR Specialist:

- Oversee labour and work-force related stakeholder engagements.
- Ensure compliance with labour laws and company policies in stakeholder interactions
- Facilitate internal coordination to address stakeholder inquiries

OHS Specialist:

- Ensure compliance with occupational health and safety regulations during stakeholder engagement activities.
- Monitor and report any safety-related concerns arising from stakeholder interactions
- Collaborate with relevant teams to implement corrective actions in case of safety incidents.

Other Project Staff:

- Provide relevant technical or administrative input based on their area of expertise
- Support the CLO in executing stakeholder engagement activities as required

7 Monitoring and Reporting

The Company will be responsible for monitoring, evaluation and reporting activities, overseeing progress related to the facility activities, outcomes, and results.

The monitoring and reporting process of the Stakeholder Engagement Plan is essential for accurately identifying the demands of stakeholders, developing strategies to respond to their needs, and actively involving stakeholders in all stakeholder engagement processes by building effective communication strategies. Stakeholders will be informed about facilities' development stages, potential impacts (involving community health and safety risks), communication channels with stakeholders, and grievance mechanism of the Company, provisions to prevent the risks of GBVH during the process through face-to-face consultation meetings, regular visits, SEP, brochure and other facility related documents, website and social media announcements, and announcements through posters/ billboards/ press release.

To ensure a comprehensive understanding of stakeholder needs, it is important that the tools used for monitoring capture relevant information about their expectations, experiences, and satisfaction levels. Conducting focus groups and one-on-one interviews with key stakeholders can provide valuable and personalised feedback. Additionally, by establishing feedback channels, such as suggestion boxes, customer service hotlines, or online platforms, can encourage stakeholders to provide ongoing feedback. In this way, it will also be possible to assess the involvement and the perception of the stakeholders as well as the level of collaboration and partnerships established with them.

This SEP is a live document; therefore, it will be reviewed and updated by including the stakeholder engagement activities carried out every 6 months for all phases. The updated version will be published on the Company website on an annual basis. The SEP will be monitored by the relevant representatives of the Company to maintain effectiveness and quality.

The CLO will also prepare reports on a semi-annual basis during construction phase and on an annual basis during operation phase, which will summarize the following:

- The number of Facility-related grievances received within the particular reporting period, their resolution status with actions taken/ to be taken, and the number of those resolved within the prescribed timeline
- Stakeholder engagement, consultation and disclosure activities are conducted within the particular reporting period together with the outcomes of these activities

These reports will be shared with the relevant representatives of the Company and the Lenders for monitoring the ongoing progress on the stakeholder engagement and consultation activities

8 Appendices

8.1 Sample Consultation Log

No	Date	Engagement Channel (i.e., phone call, face-to-face, consultation)	Authorized Person Conducting the Activity (i.e., CLO, Company representatives)	The Subject of the Engagement/Consultation Activity (i.e., current status, information disclosure, regular visit)	Type and Name of the Stakeholder Engaged (Community/Public, Mukhtar, etc.)	Number of Stakeholders Engaged	Meeting Place and Time	Notes from the Activity (i.e., employment requests, road safety grievances)	Comments/Feedback of the Authorized Person (i.e., CLO, the Company representatives) after the Engagement
1									
2									
3									
4									
5									
6									
7									
8									

8.2 Sample Grievance Register Form

A. General Information	
Company Name	
Name of the Recorder	
Form Registry No	
Date of Register	
Place of Register	☐ Office ☐ Other: Please specify the location.....
B. Means of Receiving Grievance	
☐ Telephone ☐ Petition (Please attach one copy to this form)	☐ Face-to-face meetings (site visits) ☐ Community meetings (Public Information Meetings etc.) ☐ E-mail..... ☐ Other: Please specify.....
C.1. Information about the Applicant (Please do not fill for anonymous applications)	C.2. Stakeholder Category
Name	☐ Local governmental authorities ☐ Local residents ☐ Non-governmental organization ☐ Company Employees ☐ Workers of contractors/subcontractors ☐ Consultant ☐ Media ☐ Other: Please specify
Gender	
Contact Information	
Address	
Neighbourhood/District/Province	
D.1. Information about Grievance	D.2. Grievance Category
	☐ Damage to land/crop/structure ☐ Damage to access roads ☐ Environmental impacts ☐ Use of lands without owner's consent and legal permission ☐ Restricting access to natural resources/lands ☐ Payment of usage fee or compensation ☐ Expropriation ☐ Resettlement ☐ Demand for job or work from local ☐ Working conditions ☐ Laying off ☐ Non-payments of workers' wages ☐ Debt to local suppliers or subcontractors ☐ Demanding any supports on education ☐ Demanding any supports for households/individuals ☐ Demanding any supports for neighbourhood/community ☐ Demanding any supports for local authorities ☐ Other: Please specify
E. Actions Recommended	

8.3 Sample Grievance Log

Registration number	Date of receipt and registration	How is the grievance received? (via Grievance Form, community meeting, telephone etc.)	Name of the responsible staff receiving grievance	Information about the applicant (Leave blank if application is anonymous)				Grievance category	Description of the grievance	Priority of the grievance (High, Medium, Low)	Due date of the addressing the grievance	Responsible person/ department for follow-up	Grievance status (open, closed, pending)	Action planned	Date of action taken	Supporting documents for grievance closeout and resolution
				Name and surname	Gender	Telephone and/or e-mail	District									

8.4 Project Grievance Closure Form

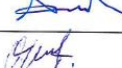
Name of the Recorder:	
Date of Register:	/...../.....
GRIEVANCE/REQUEST CLOSURE	
In this section of the Closing Form, information on how the grievance was resolved or how the request was met will be included; if there is an expenditure made, its information will be entered; an explanation that the grievance/request is agreed with the grievance/request owner will be written and signed by grievance or request owner and the relevant Ateş Wind Power employee and closed. (For grievances received over the Internet, an e-mail response will be expected instead of a signature)	
Actions Taken for Grievance/Request	Relevant Departments /Contractors/ Subcontractors
1-	
2-	
3-	
4-	
Amount of Expenditure:	
Grievance/Requestor Name and Surname	On behalf of Ateş Wind Power Title-Name-Surname and Signature

8.5 Sample Consultation Form

	Ateş Wind Power			
	İSTİŞARE KAYIT FORMU Consultation Form			
Formu Dolduran Kişi Person Filling Out the Form		Tarih Date		
Toplantı Gündemi Meeting Agenda		Görüşme Kayıt No Consultation Register Number		
1- Toplantı Bilgileri Meeting Information				
Yetkili Kişinin Adı Name of Authorized Person		İletişim Şekli Type of Communication		
İstişare Edilen Kurum Institution Consulted		☐ Yüz Yüze Face-to-Face		
Telefon/E-posta Phone/Email		☐ Telefon Phone		
Köy-Mahalle/İlçe/İl Village/District/Province		☐ Diğer Other		
Paydaş Tipi Type of Stakeholder				
☐ Kamu Kurumu Public Institution	☐ PEK PAP	☐ STK Association/NGO	☐ İlgili Grup Related Group	☐ Oda/Meslek Birlikleri Chamber/Professional Body
☐ Yüklenici/Alt Yüklenici Contractor/Subcontractor	☐ İşçi Sendikası Labour Union	☐ Medya Media	☐ Üniversite University	☐ Diğer Other
2- İstişare Detayları Details of the Consultation				
Konu Subject				
Geri Bildirim Feedback				
Not Note				

8.6 June 4, 2025 Record/Minutes of Meeting

ATES WIND POWER Integrating Innovative Sustainable Solutions	TOPLANTI TUTANAĞI FORMU		
Toplantı Adı:	Fabrika için Paydaş Katılım		
Toplantının Amacı:	Fabrika'nın Bölge Halkına Etkilerinin Araştırılması		
Tarih, Saat ve Yeri:	04.06.2025 / 10:00 / Zeytinadağ ve Sağancı Mahalleleri		
Toplantı Sekreteri:	Osman Şahbaz		
NO	GÖRÜŞÜLEN KONULAR		
1	Fabrikanın türü, üretilen ürünler, üretim süreçleri, arazi kullanımı, istihdam hedefleri ve yerel katkı planları görüşüldü.		
2	Çevresel ve sosyal etkiler detaylı olarak aktarıldı, hava emisyonları, kontrol sistemleri, atık su yönetimi, su kullanımları, arıtma prosesleri, gürültü etkileri, trafik etkileri ve sosyal etkiler görüşüldü.		
3	Köy halkı ve yerel yönetim Ates Çelik Fabrikasında gerçekleştirilen istihdamdan memnun olduklarını iletti. Daha ileriye nasıl taşınabileceği görüşüldü.		
4	Zeytinadağ yöresinden çiftçi Salih Tutar, Ali Yılmaz ve Ruhi Ak ile işletme faaliyetlerinin çevredeki çiftçilik faaliyetlerine olumsuz bir etkisinin olmadığı görüşüldü.		
5	Bölge esnafının köylere dönüştürten memnun olduğu hareketliliğin artmasından dolayı işlerinin eskiye oranla daha iyi olduğu görüşüldü.		
6	Hava kirliliği, gürültü veya trafik ile alakalı bir sorun yaşanmadığı görüşüldü.		
NO	GÜNCEL TOPLANTIDA ALINAN KARARLAR	TERMİN TARİHİ	SORUMLU BİRİM / KİŞİ
1	Toplantıların daha sık yapılmasına karar verildi.	Temmuz 25	TİG
2	Yerel halk kadınlarının daha fazla üretime dahil edilmesi için AWP tarafında bir çalışma yapılmasına karar verildi.	Aralık 25	AWP -İK
3	Yerel yönetimler ile daha fazla irtibat halinde olunmasına karar verildi	SÜREKLİ	TİG

ATES WIND POWER Integrating Innovative Sustainable Solutions	TOPLANTI TUTANAĞI FORMU			
Toplantı Adı:	Fabrika için Paydaş Katılım			
Toplantının Amacı:	Fabrika'nın Bölge Halkına Etkilerinin Araştırılması			
Tarih, Saat ve Yeri:	04.06.2025 / 10:00 / Zeytinadağ ve Sağancı Mahalleleri			
Toplantı Sekreteri:	Osman Şahbaz			
NO	ADI SOYADI	BÖLÜMÜ	GÖREVİ	İMZA
1	Osman Şahbaz	Ates Çelik	Kdm. İdr. İşl. Uzm.	
2	O	—	Zeytinadağ Muhtarı	
3	S.	—	Çiftçi	
4	A	—	Çiftçi	
5	A	—	Söğaneç Muhtarı	
6	R	—	Çiftçi	
7				
8				

