Polat Enerji Capex
Non-Technical Summary

July 2024

1. What is this document?

This Non-Technical Summary (NTS) document provides an overview of the proposed Polat Enerji Wind and Hybrid Solar Extension plant developments based on the proceeds of financing loan to Polat Enerji. A summary of relevant potential environmental and social issues and impacts is provided related to the construction and operation of the proposed developments. Appropriate measures to mitigate the key adverse environmental and social impacts that may arise during the construction and operation of the Polat Enerji power generation activities are also presented within this document.

2. The Project Summary

European Bank for Reconstruction and Development (EBRD) is currently considering providing finance to Polat Enerji Yatırımları A.Ş. ("Polat Enerji" or the "Borrower"), which is a diversified renewable energy company and 50/50 owned by the Turkish group Polat Holding A.S. ("Polat Holding") and Is Enerji Yatirimlari A.S. ("Is Enerji"), a subsidiary of Türkiye Is Bankasi A.S. (together the "Sponsors"). The Borrower operates one of Türkiye's largest renewable energy portfolios with a total installed capacity of 654MW, fully consisting of wind power plants. The Borrower is an existing client of the Bank under Project Poyraz (Op ID 53604), signed on 2 September 2022.

The Project consists of the development and construction at three sites for (i) additional 30.76 MWm / 28.6 MWe wind capacity expansion at the Borrower's operating Wind Power Plant (WPP) portfolio (i.e. Soma WPP, Geycek WPP, and Poyraz WPP), (ii) a 46.6402 MW solar power plant (SPP which will be developed under hybrid power plant regulation) co-located with the operating Geycek WPP and (iii) a battery storage project with an installed capacity of up to 10.0MWh also co-located with the Geycek WPP and/or other WPPs at the Borrower's operating WPP portfolio.

Polat Enerji Power plants are located in Anatolia, as shown below:

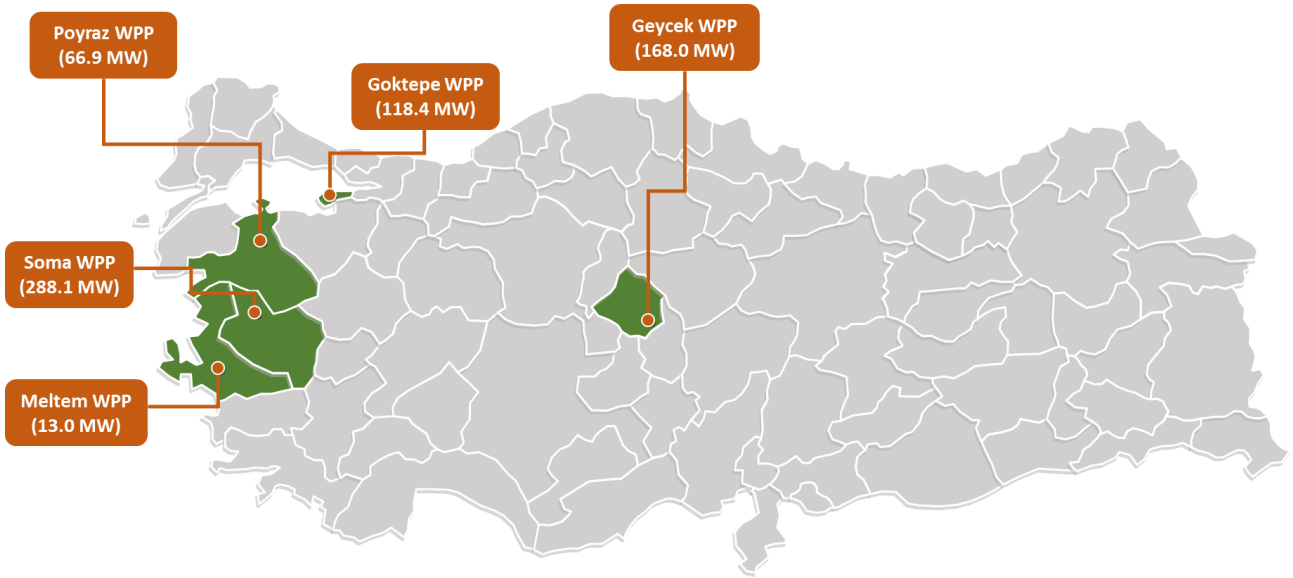

Figure 1. Polat Enerji Power Plants

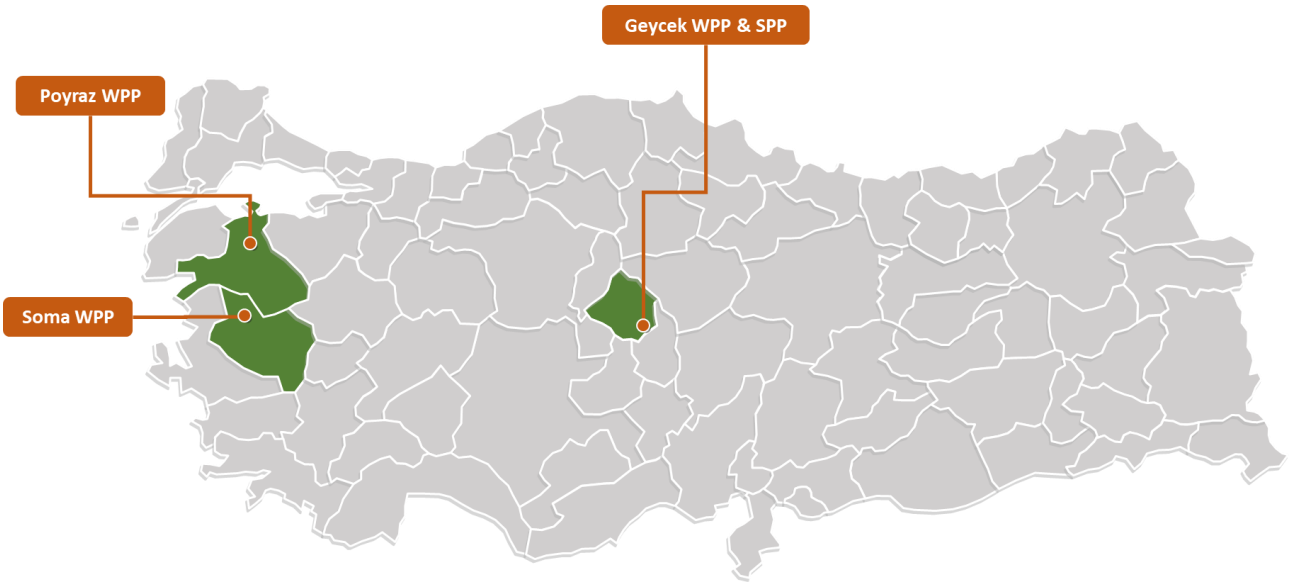

Figure 2. Power plants within the Assessment

Polat Enerji development milestones are as follows:

- The company was created in 2000 to conduct activities in the renewable sector.
- A partnership agreement was signed with EDF Renewables in 2008.
- Soma WPP came on line with 140.1 MW in 2009.
- Seyitali WPP came on line with 30 MW capacity in 2011.
- Poyraz WPP came on line with 54.9 MW in 2012.
- Geycek WPP came on line in 2013, with 168 MW being the largest WPP at the time.
- PSP Investments investment fund entered into a partnership with Polat Enerji in 2014.
- Soma WPP increased its production capacity by 100 MW in 2015.
- Poyraz WPP and Seyitali WPP increased their capacities to 66.9 MW and 36 MW in 2017.
- Cingilli Solar Power Plant (SPP) came on line in 2019.
- Soma WPP increased its production capacity by 48 MW to reach a total of 288.1 MW in 2015.
- Adnan Polat Enerji Yatırımı A.Ş. took over the EDF Renewables' and PSP Investments' shares and became a 100% shareholder of Polat Enerji and transferred 50% of the shares representing its capital to Maxis and established a partnership in 2021.
- Goktepe WPP came on line in 2022 with a capacity of 110 MW. Seyitali WPP increased its capacity to 40.7 MW.
- Goktepe WPP increased its installed capacity by 8.4 MW to reach a total of 118.4 MW in 2023.
- İş Enerji Yatırımları A.Ş. took over the Maxis' shares in 2023, thus Polat Holding and İş Enerji became 50%-50% partners in Polat Enerji.
- Seyitali WPP and Sua SPP were sold to Polat Holding and Is Enerji in 2024. Concurently, Polat Enerji acquired Meltem WPP, with a total operational capacity of 13 MW, from Polat Holding.

Soma WPP

Soma Energy currently operates 181 turbines, with a total installed capacity of 312.1 MWm / 288.1 Mwe as Soma WPP in the Soma and Kırkağaç Districts of the Province of Manisa and Savaştepe Districts of the Province of Balıkesir, Turkey. It supplies the electricity demand of 273,000 people. Approximately

560,000 tons of CO_2e emission is offset annually.

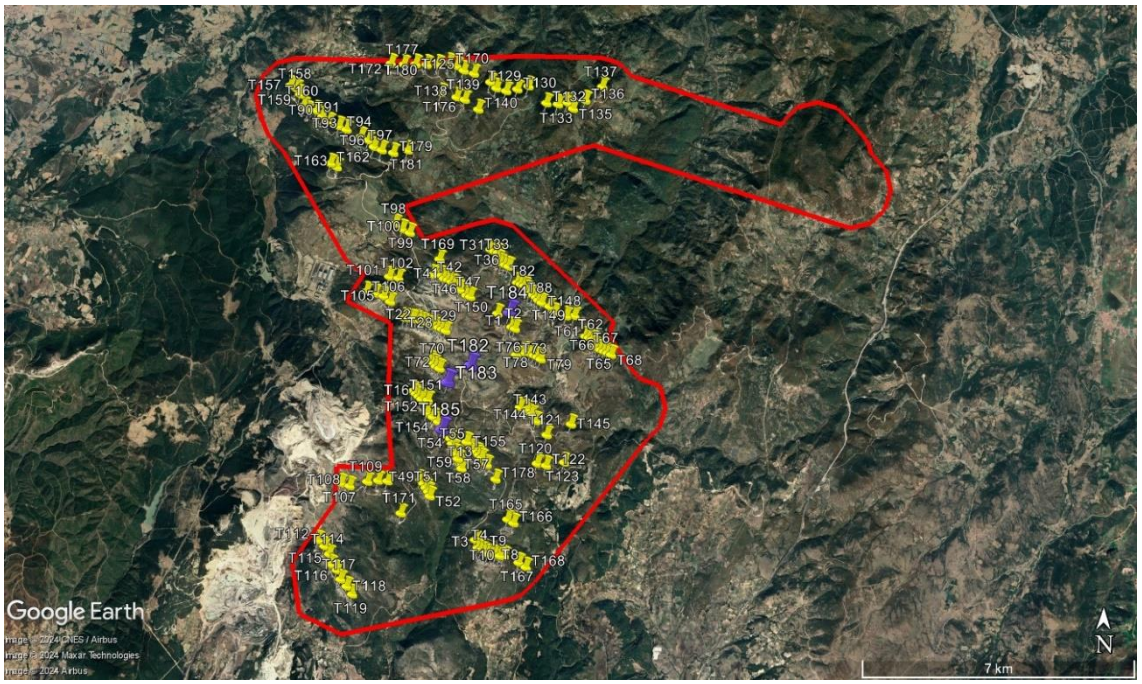

Figure 3 Overview of the Soma WPP (Red line indicates the licensing boundaries, yellow pins are existing Turbines, purple pins indicate capacity expansion turbines for this assessment)

The standard "49-year Electric Power Generation License" for the Project (License No. EÜ/1149-7/827, dated 04th April 2007) was issued by the Energy Market Regulatory Authority ("EMRA") for the Soma Wind Power Plant Project for a capacity of 140.1 MW. The expansion stages of the Project are as follows:

- Soma 1: The construction started in 2009, and the final stage was commercial operation in January 2012. Capacity: 79.2 MW.
- Soma 2: After commercial operation started, Soma Enerji applied for a capacity extension in line with the legislation. Capacity 60.9 MW
- Soma 3: In 2013, the Energy Markets Regulatory Authority of Turkey (EMRA) granted a 100 MW additional extension (Soma 3 WPP), increasing the power plant's total capacity to 240.1 MW, which started commercial operation in June 2015.
- Soma 4: Following the completion of Soma 3, Soma Enerji applied for a second extension. In January 2018, the project was granted an additional capacity extension of 48 MW, which increased the installed capacity to 288.1 MW.
- Soma 5: Part of the assessment will have a capacity of 16.8 MW using four turbines at the locations shown in the previous figures. The capacity will then be increased to 328.9 MW.

Geycek WPP and SPP

The WPP was constructed by Al-Yel Elektrik Üretim A.Ş., one of the subsidiary companies. The facility is located in Kırşehir, Mucur, and it started commercial operation in 2013. It supplies the electricity demand of 116,000 people. Approximately 240,000 tons of CO_2e emission is offset annually.

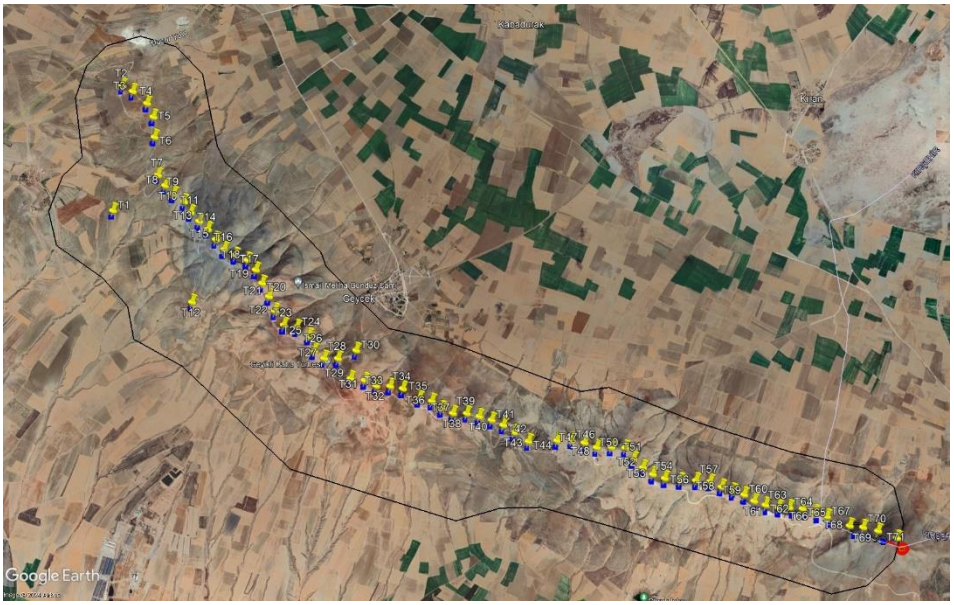

Figure 4 Overview of the Geycek WPP (The black line indicates the licensing boundaries, yellow pins are existing Turbines, and purple pins indicate capacity expansion turbines for this assessment)

Geycel WPP is Turkiye's fifth-largest wind power plant, with a capacity of 168 MW. The wind farm consists of 60 turbines with a capacity of 2.3 MW and ten turbines with a capacity of 3 MW. On 21.07.2023, an EIA Positive Certificate was obtained for the WPP project with a license EÜ/1605-1/1167, dated 14.05.2008, for a total capacity of 220,20 MWm / 172.2 MWe

The expansion stages of the Project are as follows:

- Geycek WPP 1: The construction started in 2013. Capacity: 79.2 MW.
- Geycek WPP 2: One turbine as part of the assessment, which will have a capacity of one 5.56 MWm / 4.2 Mwe

The SPP will be developed as:

- GES-1: 22.744 MWm
- GES-2: 23.896 MWm

A 10 MWh storage facility is planned in the hybrid system.

Poyraz WPP

The Project was constructed by Poyraz Yenilenebilir Enerji Üretim A.Ş, one of the subsidiary companies. It is located in Balıkesir, Kepsut, and started commercial operation in 2012. Poyraz WPP generates electricity with an installed capacity of 66.9 MW. It supplies the electricity demand of 61,000 people. Approximately 125,000 tons of CO2e emission is offset annually

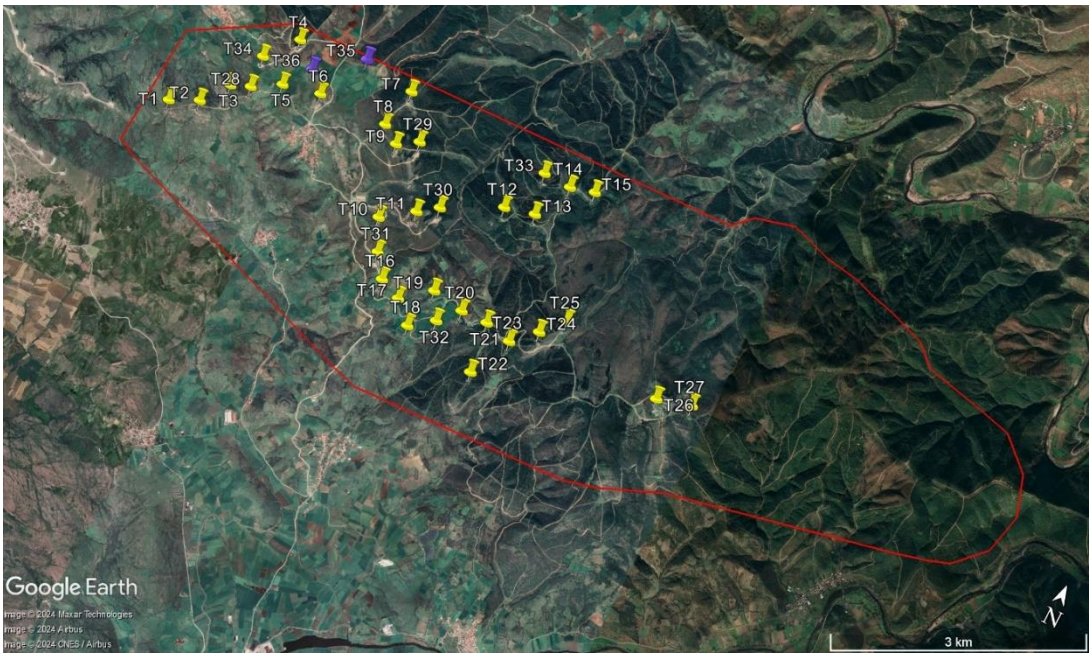

Figure 5. Overview of the Poyraz WPP (Red line indicates the licensing boundaries, yellow pins are existing Turbines, and purple pins indicate capacity expansion turbines for this assessment)

The wind farm consists of 33 turbines with a capacity of 2 MW and one turbine with a capacity of 0.9 MW. It started operating in 2012 with an installed capacity of 54.9 MW. With the latest capacity increases in 2022, the installed capacity reached 77.1 MWm / 66.9 MWe. Poyraz WPP has the necessary 'Generation Licence' issued by the Turkish Energy Market Regulatory Authority (EPDK) Poyraz WPP: Licence No: EÜ/1174-15/05391, dated 23.03.2023.

For the capacity increase turbines to be installed within the scope of the Poyraz WPP project, the General Directorate of EIA Permit and Inspection has an "EIA Not Required" decision dated 04.07.2022. On 24.07.2023, an opinion was written that the EIA Decision is also valid for Poyraz Renewable Energy.

The expansion stages of the Project are as follows:

- Poyraz 1 started operations in 2012 with an installed power of 54.9 MW.
- Poyraz 2: With the latest capacity increases in 2022, the installed power of the power plant reached 77.1 MWm / 66.9 MWe.
- Poyraz 3: Part of the assessment will have a capacity of 8.4 MWm / 8.4 Mwe using four turbines at the locations shown in the previous figures.

3. Project Finance

The proceeds of the Loan will be used to finance the development and construction at three sites for (i) additional 30.76 MWm/ 28.6 MWeMW wind capacity expansion at operating Wind Power Plant (WPP) portfolio (i.e. Soma WPP, Geycek WPP, and Poyraz WPP), (ii) a 46.6402 MW solar plant (which will be developed under hybrid power plant regulation) co-located with the operating Geycek WPP and (iii) a battery storage project with an installed capacity of up to 10.0MWh also co-located with the Geycek WPP and/or other WPPs at the Borrower's operating WPP portfolio.

4. What Environmental and Social Studies Have Been Undertaken?

Environmental Impact Assessment (EIA) of Polat Enerji facilities was conducted per the Turkish EIA Regulation. The EIA Regulation classifies projects into annexes (Annex I and Annex II) based on the potential environmental impacts considering a project's type, capacity, or location. Projects listed in Annex I are subject to a comprehensive EIA process. In contrast, projects listed in Annex II are subject to selection-elimination criteria and must prepare a Project Description Document (PDD). The EIA Regulation in Turkey was first introduced in 1993 and underwent revisions in 1997, 2002, 2003, 2008, 2013, 2014, and 2022 (current EIA Regulation - Official Gazette Date/Number: 29.07.2022 /31907). Polat Enerji power plant projects were realized in different years and, therefore, were subject to relevant Turkish EIA regulations that were valid at the time. The EIA status of each project is summarized in Table 1. All projects have the necessary 'EIA positive' or 'EIA Not Required' decisions.

Table 1 Studies for ESA Projects

Facility	Installed Capacity	Planned Expansion	Installed Capacity After Planned Expansion	EIA/PDD Decision and Official View of General Directorate of EIA, Permit and Auditing
Poyraz WPP	77.1 Mm/ 66.9 MWe 34 turbines	8.4 MWm/ 8.4 MWe (2 turbines x 4.2 MWm/4.2 MWe)	85.5 MWm/ 75.3 MWe	"EIA not Required" decisions dated 14.08.2007, 06.09.2011, and 09.04.2013 for a total of 36 turbines with an installed capacity of 85.5 MWm/75,3 MWe Official letter from the General Directorate of EIA, Permit, and Auditing of Ministry of Environment and Urbanization dated 04.07.2022 stating that the obtained "EIA not Required" decisions are valid for 36 turbines with an installed capacity of 85.5 MWm/75.3 MWe
Soma WPP	312.1 MWm/ 288.1 MWe 181 turbines	16.8 MWm/ 16.8 MWe (4 turbines x 4.2 MWm/4.2 MWe)	328.9 MWm/ 304.1 MWe	"EIA not Required" decisions dated 18.09.2007, 01.04.2011, 04.05.2011, 20.02.2013, and 21.02.2013 for 169 turbines/240.1 MWm installed capacity. "EIA Positive" decision dated 28.11.2016 for capacity expansion from 169 turbines/240.1 MWm to 317 turbines/611 MWm with 148 turbines/370.9MWm Official letter from the General Directorate of EIA, Permit, and Auditing of Ministry of Environment, Urbanization, and Climate Change dated 21.10.2022 stating that the obtained "EIA Positive" decision is valid related to technological changes resulting in 0.8 MWm/0.8 MWe capacity increase compared to the previously planned capacity of 328.1 MWm, related to the four turbines (i.e. T182-T183-T184 and T185) that are planned to be installed
Geycek WPP	168 MWm/ 168 MWe 70 turbines	.5.56 MWm/ 4.2 MWe (1 turbine x 5.56 MWm/4.2 MWe)	220.20 MWm/ 172.2 Mwe	"EIA not Required" decision dated 26.05.2008 for 70 turbines/150 MWm. Official letter from the General Directorate of EIA, Permit and Auditing of Ministry of Environment and Urbanization dated

Facility	Installed Capacity	Planned Expansion	Installed Capacity After Planned Expansion	EIA/PDD Decision and Official View of General Directorate of EIA, Permit and Auditing
				13.05.2016 stating that the obtained "EIA not Required" decision is valid related to technological changes resulting in 18 MWm capacity increase (i.e., 60 turbines with 2.3 MW capacity were operated at 2 MW due to limitations made in the software. Polat Energy then planned to operate the turbines at full capacity, which resulted in an 18 MWm capacity increase, and asked the view of the General Directorate of EIA, Permit and Auditing on the applicability of the EIA regulation). "EIA Positive" decision dated 21.07.2023 for WPP capacity expansion from 70 turbines/168 MWm/168 MWe to 72 turbines/180.4 MWm/180.4 MWe and additional solar power plant (5 units, 146.66 hectares, 113.81 MWm/109 MWe installed capacity)
Geycek SPP	-	46.64 MWm	46.64 MWm	"EIA Positive" decision dated 21.07.2023 for WPP capacity expansion from 70 turbines/168 MWm/168 MWe to 72 turbines/180.4 MWm/180.4 MWe and additional solar power plant (5 units, 146.66 hectares, 113.81 MWm/109 MWe installed capacity No assessment was conducted for the 10 MWh storage facility planned in the hybrid system (no EIA assessment or permitting is required)

The EBRD commissioned a third-party Environmental and Social Assessment (ESA) for the Project. The Project has been designated as a Category B project by the EBRD's 2019 Environmental and Social Policy as the potential E&S impacts associated with the Project are assessed to be limited and can be readily addressed and managed through the implementation of the Environmental and Social Action Plan (ESAP). The potential environmental and social impacts/risks will be mitigated through careful design and implementation of effective measures for a wide range of topics, including biodiversity and supply chain. Professional bird monitoring during the operation will be used to develop mitigation measures as needed to preserve the biodiversity including flora and fauna specifically for species of key interest. The potential environmental and social impacts are generally site-specific and can be avoided or mitigated by adhering to relevant Lenders' performance requirements, procedures, guidelines, and design criteria.

5. Scope of the Environmental and Social Assessment

The scope of work for the ESA comprised of the following:

- Identify existing and Project-related environmental and social impacts and risks.
- Describe and characterize a relevant environmental and social baseline commensurate with the risks posed by the current site operations and the Project.
- Develop a draft E&S Assessment report according to the bank's requirements

- Identify if additional studies will be required to cover relevant aspects in greater detail (e.g., biodiversity, resettlement, reduction, etc.).; and,

The work included interviews with management and workforce, a review of available environmental and social documents, a detailed environmental and social management review and analysis, and site visits for the Project and main contractor about national regulatory requirements and relevant international standards. The ESA was conducted with environmental, social, health and safety, labour and supply chain experts.

6. What are the key environmental and social impacts of the Project and the proposed mitigation measures?

Table 1 Potential Environmental & Social Impacts of the Project

Impact Topic	Potential Impact / Source		Proposed Remedial Measures
	Source	**Significance**	

Environmental and Social Assessment	No existing procedure that outlines due diligence requirements for future developments and investments, particularly related to potential acquisitions.
	
	Existing EIAs not aligned with assessments with reference to EBRD PRs
		High	• Related to future projects, undertake a gap analysis and/or Environmental and Social Impact Assessment (ESIA) following the EBRD PRs. Ensure that gap analysis/ESIA studies will cover the Project and all associated facilities.
			• Related to potential acquisitions of projects developed by others, develop and implement an Environmental and Social Due Diligence Procedure to describe the due diligence process, categorise the Project, identify gaps between current project performance and the EBRD PRs and identify and conduct actions including additional studies to close any gaps in order to be in line with the EBRD PRs.
			• Implement EIA gap analysis findings to ensure that existing EIAs are aligned with EBRD PRs
			• For new WPP projects and capacity extension projects:
			  ○ implement best practices, including avoiding major bird migratory routes and Key Biodiversity Areas (KBAs)
			  ○ undertake EIA (if required) or ESDD (if EIA is not required) and cumulative impact assessments (CIA)
			  ○ Undertake appropriate baseline studies for birds and bats and develop mitigation measures to avoid impacts. Bat assessment was undertaken in line with EUROBAT Guidance.
			  ○ Ensure adequate baseline data is provided for each wind farm (2 seasons of bird and bat data; noise and air measurements (if needed))
			  ○ For wind farms: Conduct shadow flicker, blade/ice throw, and visual impact assessments.
			• Prior to expropriation, attempt to acquire land through voluntary negotiation; ensure any expropriation is by Land Acquisition Procedure to be developed in line with PR5.

Impact Topic	Potential Impact / Source		Proposed Remedial Measures
	Source	Significance	
			• For each extension or new wind project, develop and implement carcass mortality monitoring in-house based on assessing bird and bat fatalities that also considers cumulative issues and reports to EBRD based on reporting to authorities.
Environmental and Social Management Systems Environmental and Social Policy	Enhancement of existing integrated Quality, Health and Safety, Environment and Energy management systems	High	• Develop the Corporate OHS in line with ISO 45001 and align it with the Environmental, Health, and Safety (EHS) Management system in line with ISO 14001& CSR/ESG reporting in line with international good practice and EU requirements • Develop ESMS in line with the PRs and monitor its implementation at the site. Develop ESMP, Environmental, HS, and Social Monitoring Plans (including all requirements listed in ESMS documentation), periodically evaluate compliance with the Projects, and develop Environmental, HS, and Social Monitoring Reports in line with the PRs, international good practice, and EU requirements • Develop Social related policies along the E&S management systems, specifically for social topics such as human resources, human rights, equal opportunity, child labor, and forced labor issues. • Determine and adopt environmental and social (E&S) targets and specific Environmental and Social Key Performance Indicators (KPIs) based on national and international good practice standards for the industry. • Implement the substantive requirements of the EU Directives related to OHS and environmental& social standards, as appropriate.

Impact Topic	Potential Impact / Source		Proposed Remedial Measures
	Source	Significance	
Organisational Capacity and Commitment	Lack of adequate personnel to conduct E&S management at corporate and site level.	High	• Strengthen the Asset Management and Sustainability Department organisational structure through defining clear roles, responsibilities, and authority to implement the environmental and social safeguards • Provide sufficient management commitment and financial and human resources vested with a strong mandate on an ongoing basis to achieve effective and continuous environmental and social performance. • Appoint Community Liaison officers to project sites and train the CLOs on the Corporate Social Policy & updated Social Management Procedure and ensure a robust internal monitoring and reporting mechanism is established for all site teams to enhance monitoring& reporting to the Corporate consistently. The CLOs will assume responsibility for grievance management. All CLOs to complete EBRD online training course
Supply Chain Management	Development of contractor and supply chain Management System	High	• Develop and implement a robust supply chain management system (SCMS) acceptable to EBRD to manage E&S and human rights risks in the supply chain. • Review and update the Standard OHS and Environmental Specifications (included as an annex to the contractor/supplier contracts) to ensure that the environmental and social requirements of EBRD are included and all other EBRD PR requirements are covered appropriately, as necessary. Ensure that the revised Standard OHS and Environmental Specifications are included as an annex to all contractor/supplier contracts • Enhance the existing contractor monitoring and management program at the corporate level to audit, monitor, and document contractor's environmental and social performance. • Undertake supplier/contractor risk assessment and review potential supplier/contractor labor issues and risks, including child labor, forced labor, working conditions, etc. Where labor risks are identified, work with suppliers/contractors to address these issues over a defined period • Develop a contractor management plan that defines the minimum requirements for Contractors/ Sub-Contractors/, which includes the selection and evaluation criteria for a contractor, monitoring requirements, HS

Impact Topic	Potential Impact / Source		Proposed Remedial Measures
	Source	**Significance**	
			requirements, labor requirements performance assessment, grievance management, etc., and identifies the monitoring processes of the contractor, to ensure appropriate compliance with EBRD PRs
Human Resource Policies and Working Relationships	Clauses in the employment contracts, not in line with regulations and EBRD PR2 standards.	Medium	• Develop individual HR procedures for Polat Enerji that define key employee rights in line with national laws and PR 2 requirements. • Ensure PR 2 requirements apply to corporate labor and working conditions and all sites, including contractor workers. • Respect the right of all workers to form and join a trade union of their choice without fear of intimidation or reprisal by national law. • Elect worker representatives, namely, representatives whom the undertaking workers freely elect by provisions of national laws or regulations. • Female worker representative(s) will be elected to the committee. If necessary, women representatives will meet separately with a female manager.
Non-Discrimination and Equal Opportunity	Lack of stand-alone gender policy, an inclusive gender-responsive workplace strategy, and a gender action plan (GAP) including a zero-tolerance policy against any form of discrimination, violence, and harassment policies special to the workplace and ensure everybody complies with this policy	High	• Put in place non-discriminatory policies and procedures for trade union organization, union membership, and activity in such areas as applications for employment and decisions on advancement, dismissal, or transfer. • Develop a corporate GBVH and sexual harassment policy framework and GBVH Code of Conduct for all employees and contracted workers in line with the Bank requirements and cascade down to all subsidiaries, including senior management's mission statement and intended outcome for handling GBV and sexual harassment at the workplace and identify grievance procedures allowing anonymous grievances, including handling complaints and carrying out investigations. • Communicate developed GBVH policy and Code of Conduct to contractors, sub-contractors, and core suppliers through training and regular refresher communications. • Develop and implement a GBVH grievance handling mechanism and support complainants in line with a survivor-centered approach.

Impact Topic	Potential Impact / Source		Proposed Remedial Measures
	Source	Significance	
Wages, benefits, and conditions of work and accommodation	Overtime occurrence	Medium	• Review working hours (regular + overtime) and other aspects within seven days-time scales, maximum 7,5 hours night shift, at least one-day-off in a week, maximum 270 hours overtime per year, maximum 11 hours daily work incl. overtime to ensure compliance with national regulations and EBRD PR 2 standards, identify and correct any potential deficiencies. • Conduct dedicated labor audit during construction works
Grievance Mechanism	Enhancement of the existing grievance mechanism	Medium	• Establish a formal grievance procedure that outlines the various communication channels (open-door policy, grievance box, worker representatives, etc.) for addressing grievances, with defined roles and responsibilities for the Personnel HR department and management. • Implement a structured employee grievance mechanism, including both direct and subcontracted workers, that provides information on internal communication channels and grievance procedures, emphasizing transparency and accessibility. Consider incorporating an anonymous grievance option to encourage open dialogue and resolution of concerns. • Establish a dedicated grievance channel for contractors and subcontractors in the Polat Enerji grievance procedure to ensure that all employees, regardless of employment status, have a platform to voice suggestions and address grievances effectively.
Occupational Health and Safety and Community Health and Safety	Enhancement of existing OHS plans	Medium	• Conduct electromagnetic field measurements near the main field operation, such as in the electrical manoeuvring room, power transformers, and switchyard areas, with the risk of employee health exposure • Develop and implement road safety policy, practices, and procedures to include a defensive driving training program for own drivers, contractors, and subcontractors' drivers • Follow the government emergency preparedness procedures and legislation changes after the 06.02.2023 Kahramanmaraş Earthquake and incorporate them into corporate plans and strategy.

Impact Topic	Potential Impact / Source		Proposed Remedial Measures
	Source	Significance	
			• Conduct a detailed climate change environmental, biodiversity, and OHS (Occupational Health and Safety) risk assessment study as Polat Enerji operations will be subject to risks from climate change. • Develop community risk assessment, accident investigation, and reporting system to identify and take action to prevent recurrences during the operation and construction phases, • Develop Community Health and Safety plans for each facility that will incorporate the project-related risks and adverse impacts to the health and safety of the potentially project-affected communities. The plan will include traffic management planning
Expropriation, Involuntary Resettlement and Economic Displacement	Enhancement needs for existing Land Acquisition Procedure and the Social Management Procedure	High	• Land Acquisition and Compensation Plan (LACP) will be prepared, and the expropriation method and process, gaps between national legislation and EBRD PR5, and measures to be taken should be explained. • All potential socio-economic risks within the scope of the project will be identified and managed as per the policy, • Conduct survey of pre-project and post-project income levels of PAPs affected by the project due to land acquisition and manage impacts identified
Cultural Heritage	Lack of corporate cultural heritage management plan	High	• Develop a Archaeological Chance Finds Procedure. The corporate management plans and project level Archaeological Chance Finds Procedure should be revised at each project for site-specific conditions and implement it during construction • Specific to WPP extension projects and for all future projects, consult with all relevant stakeholders (including authorities and local communities, as appropriate) when assessing impacts on cultural heritage, and maintain records of consultation made
Biodiversity windfarms	Lack of adequate biodiversity baseline and development of mitigation measures as necessary.	High	• For new WPP projects and capacity extension projects: o implement best practices, including avoiding major bird migratory routes and Key Biodiversity Areas (KBAs) o undertake EIA (if required) or ESDD (if EIA is not required) and cumulative impact assessments (CIA)

Impact Topic	Potential Impact / Source		Proposed Remedial Measures
	Source	**Significance**	
			○ Undertake appropriate baseline studies for birds and bats and develop mitigation measures to avoid impacts. Bat assessment was undertaken in line with EUROBAT Guidance. • Ensure adequate baseline data is provided for each wind farm (2 seasons of bird and bat data; noise and air measurements
Stakeholder and Information Disclosure	Lack of stakeholder engagement	High	• Implement the Corporate Level Stakeholder Engagement Plan (SEP) in line with EBRD PR 10 to cover all stakeholder engagement requirements as required by EBRD and formalize a systematic way to engage with stakeholders regularly • Develop site-specific Stakeholder Engagement Plans (SEP) for each Project • Monitor implementation of the SEP and grievance mechanism to ensure a continuous and systematic stakeholder engagement programme throughout the Project's life cycle. Documentation of all stakeholder activities and logging of grievances should be recorded to inform the annual monitoring report. The SEP should be reviewed and if necessary, updated annually or when changes occur in the Project. • Appoint Community Liaison Officers (CLOs) and supported by the Social Manager at Corporate level and as needed on a regional and Project basis, with appropriate skills and experience to effectively manage the implementation of the social management plans, Stakeholder Engagement Plan (SEP)

7. How will Polat Enerji communicate and engage with stakeholders?

Polat Enerji considers stakeholder engagement (including dialogue, consultation, and the disclosure of information) to be a key element of Project planning, development, and implementation and are committed to a transparent and respectful dialogue with stakeholders.

Polat Enerji mapped out the potential stakeholders and their interests and developed a Stakeholder Engagement Plan. This will ensure regular engagement with the affected people and vulnerable people, wider communities, local/national government, and non-governmental organizations, and media to inform them about project activities, plans and developments on an ongoing basis, and gather any complaints or feedback.

8. How can stakeholders make a request, complaint or inquire?

Polat Enerji has a Grievance Mechanisms, which provide a process for all people to easily convey their complaints and suggestions and allows the Project to respond to and appropriately resolve the issues. Grievance procedures allow people to raise anonymous complaints if they wish to.

You can raise requests, questions, feedback, and complaints through the contact details provided below.

The contact details for submitting grievances to Polat Enerji are provided below:

Polat Enerji Yatırımları A.Ş.

Gürsel Mah., POLAT OFİS, İmrahor Cd. No: 27,
34400 Kâğıthane/İstanbul

Telephone: (0212) 213 66 35

Fax: (0212) 213 66 39

E-mail: info@polatenerji.com

Website: https://www.polatenerji.com