

Environmental & Social Action Plan

S.no	Description	Anticipated Completion Date	Status
1	Enerjisa to prepare and implement a Corporate Environmental and Social Management System, in line with the requirements of IFC PSs and WBG EHS General guidelines, and Environmental and Social Management Plan. The scope of the Corporate ESMS/ESMP to include the following:a. Biodiversity Policy, Screening Procedure and Management Plan	04/30/2025	Completed
2	Enerjisa to prepare and implement a Corporate Environmental and Social Management System, in line with the requirements of IFC PSs and WBG EHS General guidelines, and Environmental and Social Management Plan. The scope of the Corporate ESMS/ESMP to include the following:b. Road-traffic safety policy and management plan	04/30/2025	Completed
3	Enerjisa to prepare and implement a Corporate Environmental and Social Management System, in line with the requirements of IFC PSs and WBG EHS General guidelines, and Environmental and Social Management Plan. The scope of the Corporate ESMS/ESMP to include the following:c. Community health and safety policy and management plan	01/31/2026	Pending
4	Enerjisa to prepare and implement a Corporate Environmental and Social Management System, in line with the requirements of IFC PSs and WBG EHS General guidelines, and Environmental and Social Management Plan. The scope of the Corporate ESMS/ESMP to include the following:d. The Social Risk Assessment (SRA) prepared in 2020 is to be updated, developed into a corporate procedure, implemented and reported on, taking into account the social impacts in the earthquake zone.	04/30/2025	Completed

5	Enerjisa to prepare and implement a Corporate Environmental and Social Management System, in line with the requirements of IFC PSs and WBG EHS General guidelines, and Environmental and Social Management Plan. The scope of the Corporate ESMS/ESMP to include the following:e. Social management and monitoring plan (SMMP) needs to be updated, and implemented through a procedure	04/30/2026	Pending
6	Enerjisa to prepare and implement a Corporate Environmental and Social Management System, in line with the requirements of IFC PSs and WBG EHS General guidelines, and Environmental and Social Management Plan. The scope of the Corporate ESMS/ESMP to include the following:f. Preparation of Contractor Management Plan (CMP) that includes Lender's E&S documentation cascaded down into (sub)contractors' scope of work through inclusion into tender documentation, contracts and their procedures during construction and operation	04/30/2026	Pending
7	Enerjisa to prepare and implement a Corporate Environmental and Social Management System, in line with the requirements of IFC PSs and WBG EHS General guidelines, and Environmental and Social Management Plan. The scope of the Corporate ESMS/ESMP to include the following:g. Revised waste management procedure	04/30/2026	Pending
8	Enerjisa to prepare and implement a Corporate Environmental and Social Management System, in line with the requirements of IFC PSs and WBG EHS General guidelines, and Environmental and Social Management Plan. The scope of the Corporate ESMS/ESMP to include the following:h. GBVH procedure and training, addressed in GM	04/30/2026	Pending
9	Enerjisa to prepare and implement a Corporate Environmental and Social Management System, in line with the requirements of IFC PSs and WBG EHS General guidelines, and Environmental and Social Management Plan. The scope of the Corporate ESMS/ESMP to include the following:i. External Assault Incident Management Procedure	04/30/2026	Pending
10	Enerjisa to prepare and implement a Corporate Environmental and Social Management System, in line with the requirements of IFC PSs and WBG EHS General guidelines, and Environmental and Social Management Plan. The scope of the Corporate ESMS/ESMP to include the following:j. Preparation and regular reporting of Company specific inclusive stakeholder engagement plan (SEP) including (i) Ayedas SEP, (ii) Baskent SEP, (iii) Update Toroslar SEP to include a dedicated section and strategy focused on external assault incident management developed in consultation with ELDER and update the NGOs identified to include Nature Association for biodiversity, (iv) Update of the Corporate SEP	04/30/2026	Pending
11	Esarj are to develop standalone E&S management system. The system will include separate internal and external grievance management mechanisms. The system has to include Emergency response plan, Environmental and social policy, Energy management policy, Product safety improvement plan, Water management policy, Health and Safety policy, Stakeholder Engagement plan (SEP), Internal grievance mechanism, External grievance mechanism, GBVH procedure and training. The integration of Enerjisa Enerji corporate policies to ESMS will be prioritized to align with the Enerjisa Enerji corporate strategy.	05/31/2026	Pending
12	Develop corporate-level procedures for Identification of Risks and Impacts that will be aligned with IFC PS1 and PS6 requirements to define and implement mitigation measures commensurate to the risk of existing and new/future infrastructure.	07/31/2026	Pending

13	Enerjisa is to establish an ESAP Committee to ensure the implementation and reporting of ESG ESAP items and the establishment of coordination between departments, and that it be integrated into the existing organization chart	11/30/2025	Pending
14	Enhance EHS capacity (Enerjisa Enerji and DISCOS) by:a. Enhance the organizational capacity of DISCO in terms of biodiversity management. The capacity increase as related to biodiversity management needs to include specific trainings/workshops for relevant managers and site teams (specifically those registering bird-related outages to allow them recognition of CR/EN/VU species).	01/31/2026	Pending
15	Ensure Internal Grievance Mechanism is established, and operational for all companies.a. Ensure E-Sarj have established their own internal grievance mechanisms that extends to contractor's workers; Grievances	01/31/2026	Pending
16	Ensure Internal Grievance Mechanism is established, and operational for all companies.b. Inform and train all employees/workers on internal grievance mechanism	01/31/2026	Pending
17	a. Prepare the GBVH procedure and ensure implementation, regular reporting and training.	12/31/2025	Pending
18	b. Assess workplaces for gender, GBVH and disability access, devise corrective measures, monitor and report implementation of these measures.	04/30/2026	Pending
19	c. Define and report GBVH related grievances separately under the grievance mechanism for both internal and external grievances. As per result of the GBVH Risk Assessment GBVH, GBVH Grievance mechanism will be evaluated whether it needs to be separated from other grievances or not, and need to ensure:• anonymity needs to be 100% secure and neither Enerjisa, lenders or other can have access to survivors information• establish partnerships with local support service providers for health, emotional support and legal services• focus of grievances needs to be exclusively on survivor and cannot focus on identifying perpetrators• anti-retaliation system in place	04/30/2026	Pending
20	d. Complete the GBVH roadmap (training plan) and submit results of the trainings	04/30/2026	Pending
21	e. GBVH focal points will be assigned for E-Sarj, as well as the distribution companies and receive first aid psychological training	04/30/2026	Pending
22	f. The security personnel need to be trained on GBVH (as well as sexual exploitation, abuse and harassment prevention).	04/30/2026	Pending
23	Conduct an external labor audit of main contractors with a focus on high-risk contractors such as construction and security contractors, but also including catering, cleaning contractors, and call center services. Implement mitigation measures to address the external audit findings. Onward internal auditing and contractors' performance monitoring activities will focus on key risk areas identified in the external audit report and will be undertaken by a team of specialized personnel on HR, OHS and legal issues and familiar with IFC PS2.Findings from ongoing internal auditing and contractor monitoring will be shared with lenders twice a year.	11/30/2025	Pending

24	Undertake a gap analysis of existing procedures against IFC's Managing Contractors' Environmental and Social Performance Good Practice Note (GPN), update existing procedures/develop new procedures, if necessary. Including but not limited to preparation of a Contractor Management Plan to be tailored to each distribution company and E-Sarj, to conduct on-site audits for all contractors, and integrate Code of Conduct compliance into the existing Contractor Performance Evaluation Form. Ensure that child labor and forced labor prohibition policy is communicated to all contractors and included in contracts.	11/30/2025	Pending
25	Provide information and regular updates on the existing situation in the container cities, including on health & safety and sanitary conditions, and establish procedures to ensure minimum standards are met. Include container cities in the semi-annual internal audits conducted according to Turkish legislation on temporary accommodation, develop a set of corrective actions to ensure local standards are met.	11/30/2025	Pending
26	• Improve existing risk assessment of physical attack/assault on employees and develop a procedure for managing the risk if necessary. • Prepare an "External Assault Incident Management Procedure" that includes prevention measures, response to events, and support in remediation. The procedure is to have monitoring program and be revised periodically against the results. Ensure that the procedure is reviewed with workshop findings and other stakeholder opinions. • Discuss the physical assault/attack issues by organizing a workshop with other distribution companies through ELDER. • Implementation of regular gender-sensitive consultations with local communities to address concerns and gather feedback regarding the safety of workers. • Conduct regular trainings on conflict management, healthy stakeholder engagement, GBVH awareness and assistance provided by Enerjisa to blue-collar workers, especially metering. • Establish a pro-active support system to all assaulted employees and provide psychological support in addition to legal support.	04/30/2026	Pending
27	Enerjisa Enerji to develop and implement a robust supply chain management system for Solar Panel Suppliers of the Customer Solution (EMC) with particular focus on selection, onboarding and verification of solar panels suppliers' E&S performance through dedicated supplier audits and monitoring to identify, manage and remediate issues associated to child labor and forced labor in the supply chain. This includes due diligence and management procedures for the sourcing of solar PV modules in accordance with IFC PS2 and PS 4 requirements. • Enerjisa Enerji shall notify the Lenders immediately if forced labor and child labor issues (including allegations) occur/are detected along the supply chains. • Specific measures to be implemented in case of identification of potential risks of child labor and forced labor will include labor audits and/or finding alternative suppliers when remedy is not possible.	04/30/2026	Pending
28	• Implement the corporate GHG emissions reduction plan and issue annual progress reports to the Lenders. • Ensure full compliance with the Regulation on Fluorinated Greenhouse Gases (in consideration of the upcoming new regulation).	11/30/2025	Pending

29	a. • Revise the waste management procedure to reflect duty of care regarding the monitoring of hazardous waste ultimate disposal, with detailed process flows for Asbestos and PCB. • Develop an inventory of PCB containing transformers and ensure regulatory compliance. • Develop an inventory of SF6 containing breakers and ensure regulatory compliance. • Ensure that the ACMs (asbestos containing materials) already identified in some of the building / or to be identified in the future are disposed of in line with regulatory requirements and duty of care is provided for their ultimate disposal. • Ensure sewage connection permits are obtained for all assets. • Report environmental incidents, if any, through ENSAFE (with clear categorization of accident/incident types)	04/30/2026	Pending
30	b. • Initiate the process of installing oil separators at the outlets of stormwater channels in warehouses / areas where transformers are stored. • Equip oil separators to the outlets of stormwater channels in warehouses/areas where transformers are stored.	06/30/2026	Pending
31	Conduct a detailed climate change risk assessment (physical risk assessment of assets and also transition risks) Conduct a climate change risk assessment study for all operations of Enerjisa Enerji with emphasis on occupational health and safety and the environment.	04/30/2026	Pending
32	DISCO to - Develop a standalone community health and safety risks assessment.- Develop and implement a community health and safety plan, - Ensure that relevant procedures and instructions updated and linked to community health and safety matters. Increase awareness campaigns in the Toroslar region to prevent third-party accidents.	01/31/2026	Pending
33	Gap analysis between the requirements of national legislation and PS4 requirements (e.g., Code of Conduct, in particular human rights, crowd management, inclusion of public security forces, use of force, screening of forces personal, etc.) including risk assessment and considering all types of operations performed by Enerjisa and revise the existing practices and relevant security procedures based on the findings, in a Security Management Plan (SMP).	04/30/2026	Pending
34	E-Sarj to: • Develop a community health and safety risk assessment. • Update procedures, specifications, and contracts with respect to community health and safety measures based on the risk assessment • Train and supervise contractors on community health and safety	04/30/2026	Pending
35	DISCO to Conduct 10% random appropriate sampling for existing office buildings and ensure that office buildings are: a. asbestos free,	04/30/2026	Pending
36	Conduct 10% random appropriate sampling for existing office buildings and ensure that office buildings are b. resistant to earthquakes and have adequate system and technical provision to safeguard against fire risks.	04/30/2026	Pending
37	•E-Sarj to: • Develop a product safety improvement plan for EV chargers. • Provide defensive, anti-skid, EV cars principle training and improve road-traffic safety practices (including contractors)	04/30/2026	Pending
38	DISCO to: • Develop a road-traffic safety management plan. • Improve road-traffic safety risk assessment.	04/30/2026	Completed

39	Enerjisa will enhance the Land Acquisition procedure to ensure that: a. Damage to crops shall be avoided and when avoidance is not possible re-scheduling the construction period or by exploring alternative project designs. b. Landowners/users are consulted, and informed prior to land entry by the contractor c. Compensation for unintentional damage to assets and cultivated areas shall be a mandatory provision in contractor contracts. Payment records for the damages to crops/assets shall be provided by the contractor as evidence upon request of the Enerjisa Enerji to ensure that no issues left behind when they exit the sites. d. Relevant data is recorded and kept.e. An annual activity report on land acquisition is prepared, including any additional information (if possible) that may be required by the lenders on evidence related issuesf. Land acquisition reports that depict progress have to be prepared for all regions which includes detailed information on:g. Information sharing activities (Article 8, Article 27, Article 10)• Grievances on land acquisition• Expropriation type (permanent, right of way, temporary)• Leased land• Impacted land/parcel size• Number of poles installed/land • Number of Project affected people (PAPs) (gender based)h. Vulnerable groups (earthquake survivors, people with disabilities, elderly 65+, women headed households) impacted	11/30/2025	Pending
40	For E-Sarj, a set of site selection criteria is to be established in a planned manner, including criteria covering social risks.	04/30/2026	Pending
41	For existing electricity distribution infrastructure in Protected Areas, Enerjisa will conduct a screening in line with PS6 to identify high-risk areas for wildlife electrocution through engagement and consultation with experts/stakeholders. Enerjisa will insulate poles and lines in these high-risk areas within the Protected Areas in line with a schedule to be determined based on the outcomes of the screening, which will also determine the length of distribution lines and number of poles to be insulated, as well as required time and workforce to do the insulation.	04/30/2026	Pending