

Annual Environmental & Social Report (AESR)

Please read the points below carefully before completing this AESR template:

- a) This template is prepared to enable EBRD Clients to provide the EBRD with an annual report, in form and scope satisfactory to the EBRD, on environmental and social matters arising in relation to the Project (i.e. the business activity for which EBRD financing has been provided) or which may affect the Project. Where the Project is located at an existing Client facility and/or operation, the Client is required to provide information with respect to the Project and the existing facility and/or operation (e.g. health and safety statistics for the facility should be provided).
- b) This template requires provision of a summary of the Project environmental and social (E&S) performance, an update on implementation of the Environmental and Social Action Plan (ESAP) and other relevant information to help the EBRD review the Project's compliance with the applicable environmental and social laws and the EBRD Performance Requirements (PRs) as well as an overall update of E&S status.
- c) There are number of questions where further information is requested. Additional information can either be provided in summary form in the boxes provided or, if more convenient, additional information can be attached to the report.
- d) Some sections of this template may seem less relevant than others. The EBRD recognizes that this will be the case but encourages Clients to provide clear and sufficient information in all sections of the template. The more comprehensive the answers given, the less need there may be for the Bank to request further information. Please, therefore, try to answer the questions as fully and openly, as possible.
- e) The information provided in this template will constitute a representation regarding the Client under the financing documentation.

	• In order to provide the sustainable fuel supply and reduce the cost of the Biomass fuel, Additional Biomass fuels adaptation to the plant license in progress.
	Ezine Project:
	• The second phase Plant PAC Has been done with government on 31.03.2024.
	Total accepted capacity reached to 18,78 MWe.
	• The Biomass fuel homogenization and feeding system construction and
	commissioning have been don and in operation.
	• The Performance test of the Boiler and Turbine Have been done.
	Balance of the civil works have been completed.
	• Plant has been operated 59,3% Avg. electricity capacity utilization rate in 2023.
	Fuel supply chain contacts and organization improved in 2023.
	• In order to provide the sustainable fuel supply and reduce the cost of the Biomass
	fuel, Additional Biomass fuels adaptation to the plant license in progress.
	İzmir / Aliağa "Chemical Upcycle Project"
	 Project development is in progress, financing alternatives of the project to be finalized by Q₄/2024.
	 The incentive package for the project is achieved.
	 Land allocation procedures are initiated; dedicated land is identified together with
	Ministry and formal procedures are expected to be finalized in June 2024.
	• The tests for pretreatment & the plot test of the pre-treatment products are on-
	going process.
	PO for main major equipment is issued.
	• EPC selection is initiated, project management structure & team are established;
	pre-feed studies to be finalized by end of July 2024.
	• EIR study is initiated, expected to be finalized by end of 2024.
	Aksaray Project:
	• Existing sanitary landfill & LFG plant are in operation.
	• Mechanical Sorting Facility (MBT) construction is finalized by March 2024.
	Administration building construction is completed by March 2024.
	Composting Facility construction is completed by March 2024.
	• Construction of landfill 2nd lot is started in August 2023 & finalized by March 2024.
	• Construction of fire-fighting system, tire washing units are finalized by March 2024.
	• Ministry Permits procedures are initiated for 2nd lot, MBT, Compost unit & expected
	to be finalized in June 2024.
	• The asset is sold in accordance with Biotrend's growth strategy, with the share transfer to Mana Enerji issued by March 2024.
	Ayvacık Project:
	 In Ayvacık Project, Sanitary Landfill construction is under responsibility of Bank of
	Province (iller Bankası) and site as stage-1 (sanitary landfill) is delivered, stage-2 MBT
	to be delivered to Biotrend by end of 2024 by İller Bankası.
	• Energy transmission line, transfer stations, related complementary works to be
	initiated in accordance with Bank of Province (İller Bankası) progress.
	Balıkesir Project:
	 Existing 2nd lot of sanitary landfill & LFG plant are in operation.
L	

 Construction of the mechanical sorting facility (MBT) and RDF facility is finalized by May 2023, and are in operation. Capacity increase for RDF plant for second line is initiated, expected to be finalized by end of 2024. PO for the main equipment (shredder) to be issued by End of June 2024. Bergama Project:
• Existing 2nd lot of sanitary landfills, LFG plant, fermentation (3 x anaerobic digesters) are in operation.
• Capacity of the plant / landfill revised as 1.200 ton/day.
 Purchase of self-owned landfill operation equipment (excavator, dozer) are issued. Organic dosing system & bunkers are modified to feed 3 x anaerobic digesters efficiently.
• Organisation to provide alternative organics for the enrichment of the feedstock provided to 3 x anaerobic digesters are established.
 Construction of the RDF facility is finalized by August 2023, and are in operation. Installation of the firefighting system was completed; testing and commissioning process are finalized by June 2024.
 Installation of the additional desulphurization unit continues and planned to be operational in May 2024.
• Construction of the 3rd lot/cell of sanitary landfill is initiated, design & design approval will be finalized by End of June 2024, construction of the cell expected to be finalized by first quarter of 2025.
 Design & Construction of the 2 MBT (Mechanical Sorting) facility is initiated, construction of the unit to be finalized by first quarter of 2025. Construction of the Composting & RDF facility is initiated by January 2024, and
expected to be finalized by July 2024.
• Construction of the Leachate Treatment Plant is finalized, and in operation by April 2024.
Construction of the Digestate Treatment facility is initiated, PO for main equipment is issued; expected to be in operation by end of August 2024
Construction of the additional bale storage area (1.300 m2) is finalized by end of April 2024.
Harmandalı Project:
Existing sanitary landfill & LFG plant are in operation.
• Purchase of self-owned landfill operation equipment (excavator, compactor, dozer) are issued.
 Construction of main warehouse is finalized; warehouse management system is established. Additional administration building, cafetoria construction are completed by May
 Additional administration building, cafeteria construction are completed by May 2023. Construction of the MRT (Mechanical Serting) facility is finalized by June 2022, and
 Construction of the MBT (Mechanical Sorting) facility is finalized by June 2023, and are in operation. Construction of the RDE facility is finalized by June 2022, and are in operation.
 Construction of the RDF facility is finalized by June 2023, and are in operation. Capacity increase for RDF plant for second line is initiated, expected to be finalized by end of 2024. PO for the main equipment (shredder) to be issued by end of May 2024.
• The operation of Landfill is being carried out in accordance with the guidance of technical consultants.

Uşak Project:
• Existing sanitary landfill, LFG plant, fermentation (1 X Anaerobic digester) are in operation.
• Construction of warehouse is finalized; warehouse management system is established.
• Purchase of self-owned landfill operation equipment (forklift) are issued.
• Construction of fire-fighting system & tire washing units are finalized by June 2023, are in operation.
• Organic dosing system & bunkers are modified to feed 1 x anaerobic digesters efficiently.
• Organisation to provide alternative organics for the enrichment of the feedstock provided to anaerobic digester are established.
• Construction of the desulphurisation unit is finalized, and in operation by January 2024.
• Construction of the Digestate Treatment facility is initiated, PO for main equipment is issued; expected to be in operation by end of August 2024
• Design & Construction of the solar farm (hybrid power plant) for the capacity of 820 kWp/750 kWe is initiated, construction of the unit to be finalized by November 2024.
İnegöl-I Project:
 Existing sanitary landfill & LFG plant are in operation.
 Capacity increase of the LFG plant is initiated, formal procedures are expected to be
finalized the second half of 2024, and additional engine to be installed accordingly.
 Purchase of self-owned landfill operation equipment (excavator & dozer) are issued.
• Construction of fire-fighting system is finalized by June 2023, are in operation.
• Construction of landfill 2nd lot (by Municipality) is started in September 2023 &
expected to be finalized by September 2024.
İnegöl-II Project:
• Existing 2nd lot of sanitary landfills, LFG plant, fermentation (4 x anaerobic digesters) are in operation.
 Capacity of the plant / landfill revised as 1.600 ton/day.
Purchase of self-owned landfill operation equipment (forklift) are issued.
• Construction of fire-fighting system is finalized by June 2023, are in operation.
• Construction of the desulphurisation unit is finalized, and to be in operation by $Q_2/2024$.
• Organic dosing system & bunkers are modified to feed 1 x anaerobic digesters efficiently.
• Organisation to provide alternative organics for the enrichment of the feedstock provided to anaerobic digester are established.
• Construction of the Digestate Treatment facility is initiated, PO for main equipment
is issued; expected to be in operation by end of August 2024
• Construction of the additional bale storage area (600 m2) is finalized by end of April 2024.
İskenderun Project:
 Existing sanitary landfill & LFG plant are in operation.
 Capacity of the plant / landfill modified in accordance with the main earthquake in the region in 2023.

Giresun Project:
 Existing sanitary landfill & LFG plant are in operation.
• Acceptance of the second engine is issued; the installed capacity of the LFG plant is revised as 2,828 MW.
• Purchase of self-owned landfill operation equipment (excavator) are issued.
• Construction & modification of existing of fire-fighting system is finalized by June
2023, are in operation.
• The asset is sold in accordance with Biotrend's growth strategy, with the share
transfer to Mana Enerji is issued by March 2024.
Malatya Orduzu Project:
• Existing sanitary landfill, LFG plant, greenhouse & fermentation unit (2 x Anaerobic
Digesters) are in operation.
• Construction & modification of existing of Mechanical Sorting Facility (MBT) is finalized by June 2023, are in operation.
 Capacity of the plant / landfill revised as 600 ton/day.
 Purchase of self-owned landfill operation equipment (Beko-loader) are issued.
 Organic dosing system & shredders are revised to feed 1 x anaerobic digesters
efficiently.
• Organisation to provide alternative organics for the enrichment of the feedstock
provided to anaerobic digester are established.
• Rehabilitation project / design approval by Ministry (closure of old cells) are
initiated, expected to be in finalized by end of 2024.
Meletus Kenikawa Drejest
Malatya Kapikaya Project:
 Existing sanitary landfill & LFG plant are in operation. Construction of landfill 2nd lot (by Municipality) to be started by end of 2024 &
expected to be finalized by September 2025.
Sivas Project:
 Existing sanitary landfill & LFG plant are in operation.
• Construction of heat supply lines for greenhouse is finalized by August 2023 & the
system is in operation.
• Construction of landfill 2nd lot (by Municipality) to be started by end of 2024 &
expected to be finalized by September 2025.
 Construction of waste transfer station to be started by end of 2024 & expected to be finalized by May 2025.
be manzed by May 2023.
Maven Tarım Greenhouse Project:
• Construction & commissioning of the greenhouse is finalized by July 2023,
production & sales of tomatoes in the greenhouse are achieved accordingly.
• Construction of fire-fighting system is finalized by June 2023, are in operation.
• Construction of fresh water supply & treatment system are finalized by June 2023,
are in operation.
• Design & Construction of heat buffer system to use extra heat from the LFG plant
are initiated, expected to be in finalized by end of 2024.

3. General		
3.1. Have any new	Yes: 🗆	If yes, please provide details:
environmental and	No: 🛛	
social risks and		
impacts associated		
with the project		
(and existing		
facility, if		
applicable) been		
identified which		
were not foreseen		
by or contemplated		
in the		
Environmental and		
Social Action Plan?		If was also also also instant factoria de la seconda de la seconda de la seconda de la seconda de la seconda de
3.2. Have there	Yes:🛛	If yes, please describe incident/accidents, damage caused by the
been any accidents or incidents that	No: 🗆	incident/accident, including details of actions to repair and prevent
have caused		reoccurrence:In our Izmir Harmandalı project, waste was disposed outside the facility
damage to the		boundary. In 2023; the site management plan is revised accordingly (with
environment, third		participation of municipality); new cells / areas are determined for the
party		disposal of the municipal solid waste.
property/assets,		 In our Ezine project, damage occurred to agricultural land due to dust
cultural heritage, or		emissions. In 2023; The root-cause analysis for the issue is implemented; the
created liabilities		main cause of the problem is eliminated. (The preparation of the fuel
for the Client?		(shredding of the forestry wastes) in-site cancelled, & alternative dust free
		long term (like SRF) fuels to the plant is provided. And all the fuels are being
		stored in in-door condition to overcome the similar events.
		• In our Giresun project, wastewater was mixed into the receiving
		environment due to heavy rainfall. Following the issue; the capacity of the
		leachate treatment plant is increased with additional one train to double
		capacity; and an extra abnormal condition pit/lagoon with a capacity of 1.750
		m3 is constructed to eliminate such cases in future.
3.3. Have there	Yes:🛛	If yes, please describe identified violations, including resulting penalties,
been any	No: 🗆	status of implementing corrective actions to address any violations found:
suspensions,		
closures, penalties,		
fines and/or corrective action		3.3.a) Environmental
plans imposed by		In our Izmir Harmandalı project, administrative sanctions were imposed by
environmental,		the Provincial Directorate of Environment, Urbanization and Climate Change
health and safety,		because waste was disposed of outside the facility border. The area where
labor authorities on		waste is taken is a landfill expansion area and permit processes are ongoing.
the Project (and		
existing facility, if		In our Uşak project, administrative sanctions were imposed by the Provincial
applicable) or the		Directorate of Environment, Urbanization and Climate Change due to failure
Project/Client		to fulfill the obligation to not provide information. Disposal reports could not
contractors?		be obtained due to a change in the management of the Organized Industrial
		Zone to which the wastewater was sent. For this reason, wastewater disposal
		reports could not be submitted to the Provincial Directorate of Environment,
		Urbanization and Climate Change.

		Directorate of agricultural la In our Gires Provincial Dir to wastewate 3.3.b) Health Inspector au Bergama. 1 nonconformini imposed on	of Agriculture and due to du sun project, rectorate of E er mixing into and safety dit from Min 8 nonconfor ties have bee the facility	and Forestry of st. administrative nvironment, Urk the receiving er istry of Labor S rmities were en made. But at	due to the dama sanctions were banization and Cli hvironment due to Social Security w detected. The fter the audit, a mpliance related	the Ezine District ge caused to the imposed by the imate Change due o heavy rainfall. as taken place in studies for all penalty has been to unsuccessful
		3.3.c) Labour There were n		s, closures or iss	sued fine imposed	l in 2023.
3.4. Have there been any exceedance of the emission and discharge standards that apply to the Project (either by regulation or as agreed with the EBRD)	Yes:□ No: ⊠	If yes, please	describe, incl	uding details of	corrective action	s:
3.5. Have there been any court cases field or determined against the Project (and existing facility, if applicable) in the reporting period that are related to	Yes:⊠ No: □	the previous enhance ope workplace ind In accordance workers who	year. Process rational effic compatibility. e with the Co se employme	es related to the iency or to pre ompany's policy, nt contracts are	e exit of workers event situations , standard packag	units compared to are carried out to that may lead to ges are offered to strive to adhere to ers.
labour, health and safety, environment, land acquisition, damage to third party assets, etc.?		COURT Malatya 2. Labour Court Bursa 2. Labour Court	NUMBER 2023/473 2023/441	PLAINTIFF Hulusi Gürbüz Metin Yelkovancı	DEFENDANT Doğu Star Doğu Star	SUBJECTlabourreceivableslabourreceivables
		Osmaniye 1. Labour Court	2023/533	Fatma Çolak Memet Çolak	Nov Enerji	Claim for Compensation

		Sevim Çolak		Due to Work Accident
İzmir 17. Labour Court	2023/304	Canali İmanur	İzmir Novtek	labour receivables
İzmir 3. Labour Court	2023/195	Furkan Çalgın	İzmir Novtek	reinstatement request
İzmir 13. Labour Court	2023/174	Doğan Tavasoğlu	İzmir Novtek	labour receivables
İzmir 13. Labour Court	2023/173	Baha Zan	İzmir Novtek	labour receivables
Bursa 2. Labour Court	2023/200	Kadir Şirin	Doğu Star	labour receivables
İzmir 21. Labour Court	2023/126	Şahin Çiçek	İzmir Novtek	labour receivables
Malatya 3. Labour Court	2023/123	Orhan Boztaş	Doğu Star	labour receivables
İstanbul Anadolu 8. Labour Court	2023/177	Gürcan Aylar	Biotrend	Claim for Compensation Due to Work Accident
İstanbul Anadolu 2. Labour Court	2022/668	Fuat Ertunç	Biotrend	labour receivables (in the court of appeal)
Ulak 2. Labour Court	2022/354	Ertan Çakır	Uşak Yenilenebilir	labour receivables (in the court of appeal)
Karşıyaka 1. Labour Court	2022/181	Burhan Çoban	İzmir Novtek	labour receivables
Karşıyaka 3. Labour Court	2022/252	Muhammet Ali Bayrak	İzmir Novtek	labour receivables

Karşıyaka 4. Labour Court	2022/126	Volkan Özen	İzmir Novtek	labour receivables
İzmir 18. Labour Court	2022/161	Cihan Hüseyinoğlu	İzmir Novtek	labour receivables
İzmir 20. Labour Court	2020/229	Ebubekir Karagöz	İzmir Novtek	labour receivables (in the court of appeal)
Bergama 1. Civil Courts of First Instance	2023/713	Cihan Dinçel	İzmir Doğu Star	Claim for Compensation Due to Work Accident
Çine Civil Courts of First Instance	2023/128	Zekeriya Taşkıran	Biyomek	reinstatement request (in the court of appeal)
İnegöl 1. Civil Courts of First Instance	2023/83	İsmail Fidan	Doğu Star	Claim for Compensation Due to Tort (Financial compensation claim of the driver of the vehicle who fell into the pit opened by the subcontractor company)
Bergama 1. Civil Courts of First Instance	2023/10	Hatice Sürgün	İzmir Doğu Star	labour receivables
Bergama 1. Civil Courts of First Instance	2022/578	Serhat Boyraz	İzmir Doğu Star	reinstatement request

		Bergama 1. Civil Courts of First Instance	2022/565	Mehmet Kalın		zmir Do tar	r c	einstatem equest (in ourt of ppeal)	
		Bergama 1. Civil Courts of First Instance	2022/564	Minel To		zmir Do tar	<u> </u>	einstatem equest	ent
		Malatya 5. Civil Courts of First Instance	2022/301	Güllü Ça	m D	oğu Sta	C I N I t	Claim for Compensa Due to Material Damage D o Traffic Accident	
3.6. Have there been any new acquisitions, significant capital expenditures or divestments during the reporting period?	Yes:□ No: ⊠	lf yes, pleas	e describe:						
4. Human Resources Unless otherwise noted, the questions in this section apply to both direct employees and non-employee workers (e.g. contractors and other 3 rd party workers and contractors working on the Project site (and existing facility, if applicable) or performing work directly related to the core functions of the Project).									
	Tot	tal R	ecruited in the	ereporting	period	Disn	nissed in t peri	-	ting
Number of direct employees:	Men: Women: Other:	654 173 0	Men: Women Other:	532 : 235 0		-	Men: Women: Other:	126 52 0	

Men:

Women:

Other:

Men:

Women:

Other:

International: %

0

0

0

0

0

0

If yes, please describe, or attach to this report, the collective

dismissals plan, including reasons for dismissals, number, gender,

undertaken, and measures to mitigate the effects of dismissals:

and age of workers involved, how they were selected, consultation

of

of

Men:

Women:

Other:

Men:

Women:

Other:

Yes:

No: 🖂

International: %

0

0

0

0

0

0

Number

Number of

workers:

Number

employees:

contracted workers:

seasonal/temporary

4.1. Were there any

collective dismissals

and/or as defined in

the national labour

code affecting the

Men:

Women:

Other:

International: %

0

0

0

directly employed workforce during the reporting		
4.2. Are there any collective dismissals planned for the directly employed workforce in the next year?		If yes, please describe, or attach to this report, the collective dismissals plan, including reasons for dismissals, number, gender, and age of workers involved, and selection and consultation process:
4.3. Were there any changes to: Worker representation at the Project facilities? Collective agreements?	Yes: 🗌 No: 🖾	If yes, please provide details, and summarize engagement with workers, worker representatives, trade unions, and relevant state authorities during the reporting period:
4.4. Have there been any strikes or other collective disputes related to working conditions in the reporting period?	Yes:□ No: ⊠	If yes, please summarize nature of, and reasons for, disputes and explain how they were resolved.
4.5. Have employees and contractors raised any grievances concerning the Project or the Client including working conditions?	Yes:⊠ No: □	If yes, please state how many complaints were made and through which channels the issues were raised (e.g. grievance mechanism, trade unions, courts, media, etc.); report number of grievances by male and female staff and explain how the Client has addressed them: There have been complaints about the fact that a driver working at the Bergama facility is unqualified. As a result of the vaccinations sent to our corporate e -mail via personal mail, the subject was sent to the Human Resources Department and the necessary action was realized by human resources.
4.6. Have employees and contractors raised any grievances concerning any type of discrimination, harassment (including sexual harassment) or bullying during the reporting period?	Yes:⊠ No: □	If yes, please state how many complaints were made and through which channels the issues were raised (e.g. grievance mechanism, trade unions, courts, media, etc.); report number of grievances by male and female staff and explain how the Client has addressed them: A manager was referred to the Disciplinary Board due to allegations of verbal sexual harassment against a subordinate employee. The Ethics Committee convened to review the case. Based on the Ethics Committee's decision, the accused manager was referred to the Disciplinary Board for further investigation. The Disciplinary Board issued a verbal warning to the manager in question. He is not working for Biotrend anymore.
4.7. Is there an Equal Opportunities Action Plan/Gender Action	Yes:□ No: ⊠	If yes, please attach an implementation report including any further progress made during the reporting in the implementation of the plan. Please provide the results of any other related

Plan (GAP) for the Company?		monitoring carried out by the Client or its consultants and attach any additional information you think would be useful.
4.8. Have workers	Yes:🛛	
received training	No: 🗆	If yes, please information about the type of training received
about their terms of		(including induction) and the number of workers trained.
engagement,		- First Aid Training: 9 People / 16 Hours Per Person
working conditions,		- Basic OHS Training: 97 People / 15 Hours Per Person
code of conduct, etc.		- Toolbox Training: 10 People / 36 Minutes per Person.
during the reporting		- QDMS Training: 20 People / 2 Hours Per Person
period?		- Other: 93 People / 4 Hours Per Person

5. Health and Safety

5.1. Please provide information on any accidents/incidents that have happened to employees, contractors or other third parties during the reporting period? Please confirm circumstances, severity of the accident (fatal, serious, minor etc.), status of investigation and remedial action taken (please attach additional documentation if appropriate).

	Employees	Contractors	Third Party	Details
Average	Men:667	Men:293	Men:0	
workers	Women:174	Women:118	Women:0	
workers	Other:0	Other:0	Other:0	
Total	Men:1591587	Men:816739	Men:0	
work	Women:415197	Women:328925	Women:0	
hours	Other:0	Other:0	Other:0	
	Men:0	Men:0	Men:0	
Fatalities	Women:0	Women:0	Women:0	
	Other:0	Other:0	Other:0	
Lost time injuries	Men:32 Women:10 Other:0	Men:13 Women:1 Other:0	Men:0 Women:0 Other:0	Electric shock: 1 Broken and dislocated: 8 Skin injury: 9 Foreign object in the eye: 3 Sprain: 7 Slipping and falling: 10 Cut: 4 Material hitting: 5 Burned: 7 Injury: 2
First aid injuries	Men:24 Women:22 Other:0	Men:11 Women:9 Other:0	Men:0 Women:0 Other:0	Skin injury: 15 Slipping and falling: 4 Foreign object in the eye: 8 Illness: 4 Sprain: 5 Cut: 6 Material hitting: 7 Burned: 2 Poisoning:14
Fire	Men:0 Women:0 Other:0	Men:0 Women:0 Other:0	Men:0 Women:0 Other:0	The Ulubey facility has experienced 15 incidents of ignition. The Biyomek facility has experienced 7 incidents of ignition.

				The Ezine facility has experienced 5 incidents of ignition.
Properly	Men:0 Women:0	Men:0 Women:0	Men:0 Women:0	
damage	Other:0	Other:0	Other:0	
Vehicle incidents	Men:0 Women:0 Other:0	Men:0 Women:0 Other:0	Men:0 Women:0 Other:0	The garbage truck at the Aksaray facility rolled into the waste disposal area while parked, as the handbrake was not engaged. The window of the construction vehicle was broken at the Ezine facility.
Near	Men:37	Men:0	Men:0	
misses	Women:7	Women:0	Women:0	
1113303	Other:0	Other:0	Other:0	

5.2. Please provide information on the H&S training provided to employees or contractors during the reporting period. Please provide the training topics and the numbers of workers that have been trained.

• Occupational Health & Safety Training:

Place	Number of Participants	Place	Number of Participants
Kavacık	87	Aydın	265
İnegöl	275	Ankara	15
Bergama	268	Harmandalı	64
Malatya	52	Ezine	137
Aksaray	17	Sivas	19
İskenderun	20	Balıkesir	65
Uşak	76	Giresun	18

Place	Number of Participants
Bergama Contractors (SCA)	72
İnegöl Contractors (SCA)	45
Harmandalı Contractors (Garanti Plastik)	150

• Explosion Protection and Confined Spaces Training:

Place	Number of Participants		
Bergama	96		
Malatya	30		
İnegöl	105		
Aksaray	25		
Harmandalı	14		
Aydın	17		
İskenderun	5		
Sivas	15		

Giresun	6
Uşak	6

• Working at Height Training:

Place	Number of Participants		
Harmandalı	27		
İnegöl	84		
Bergama	226		
Kavacık	1		
Uşak	39		
Malatya	17		
Giresun	5		
Balıkesir	26		
Aydın	28		
Aksaray	8		

• Logo out Tag out Training:

Place	Number of Participants		
Bergama	14		
Harmandalı	4		
Aksaray	2		
Ezine	8		
İnegöl	43		
İskenderun	4		
Sivas	2		
Uşak	7		
Malatya	6		

• Control of Biological Substances Hazardous to Health Training:

Place	Number of Participants		
Aksaray	15		
Bergama	54		
Harmandalı	16		
İnegöl	44		
Uşak	14		
Aydın	24		
İskenderun	3		
Malatya	20		
Giresun	10		
Sivas	11		
Uşak	8		

Risk Assessment Training:

Place	Number of Participants	Place	Number of Participants
Kavacık	5	Harmandalı	4
İnegöl	5	Ezine	6

Bergama	8	Sivas	4
Malatya	8	Uşak	5
Aksaray	3	Giresun	4

H&S Board Members Training:

Place	Number of Participants	Place	Number of Participants
Giresun	4	Aydın (Biyomek- Ulubey)	12
İnegöl	10	Ezine	30
Bergama	11	Uşak	9
Malatya	6	Harmandalı	13

• Control of Chemical Substances Hazardous to Health Training:

Place	Number of Participants				
Aksaray	17				
Bergama	37				
İnegöl	22				
Aydın	43				
Balıkesir	22				
Harmandalı	27				
Malatya	16				
Giresun	5				
Uşak	5				

• Emergency Squad Training:

Place	Number of Participants
Kavacık	16
Ankara	4
Aksaray	6
Aydın (Biyomek,Ulubey)	34
Bergama	39
Ezine	44
Harmandalı	13
İnegöl	40
İskenderun	9
Malatya	16
Serenti	7
Sivas	16
Uşak	20
Balıkesir	22

• Work Accidence and Near Miss Training:

Place	Number of Participants				
Harmandalı	42				
İnegöl	31				

Aksaray	9
Bergama	28
Sivas	2
Uşak	47
Aydın	28
Balıkesir	26
Ezine	32
Malatya	18
Sivas	14
Giresun	5

HAZOP Training:

Place	Number of Participants			
Kavacık	14			

• EKAT Training:

Place	Number of Participants				
Aksaray	1				
Aydın	1				
Bergama	1				
Ezine	1				
Harmandalı	1				
İnegöl	2				
İskenderun	1				
Malatya	2				
Giresun	1				
Sivas	1				
Uşak	1				

• Professional Competence Training:

Place	Number of Participants
Aksaray (Plastic Welder)	1
Bergama (Plastic Welder, Steel Welder, Machine Maintenance)	11
Harmandalı (Plastic Welder)	7
İnegöl (Crane Operator)	4
İskenderun (Plastic Welder)	2
Malatya (Plastic Welder)	3
Giresun (Plastic Welder)	1
Sivas (Plastic Welder)	2
Uşak (Plastic Welder, Steel Welder)	4

• Fire Training:

Place	Number of Participants				
Kavacık	53				
Aksaray	6				

Aydın	66
Bergama	128
Ezine	47
Harmandalı	17
İnegöl	88
İskenderun	9
Malatya	30
Giresun	10
Sivas	15
Uşak	55

• First Aid Training:

Place	Number of Participants		
Ankara	1		
Kavacık	8		
Aksaray	1		
Aydın	5		
Bergama	9		
Ezine	4		
Harmandalı	3		
İnegöl	7		

5.4. Please provide information on the any H&S inspections/audits which have been carried out during the reporting period. Please confirm if these were carried out by the Client or by an independent H&S expert and if any corrective actions are outstanding.

• All Facilities get service from OSGB (Joint Health and Safety Unit) for health and safety activities. In addition, all works have been controlled by HSE System Specialist from head office.



All necessities and standards of the ISO 45001, 14001 and 9001 carried out in all facilities. In 2023, All certifications have been obtained for all facilities. Internal audits are conducted before ISO 9001, ISO 14001, and ISO 45001 certification processes.





- EBRD audit (Surveillance audit) was taken place in Harmandalı. Also, After the 2022 TSKB audit, a follow-up audit has been conducted. (Environmental and Social Compliance Audit) was taken place in Aksaray and Ezine facilities.
- Non-conformities identified after internal and external audits are tracked through the QDMS and DIF Follow-up List, and actions are taken accordingly. After a workplace accident, an accident report is prepared. Root cause analysis is conducted regarding the accident. The employee's training is reiterated after the workplace accident.
- After workplace accidents, corrective and preventive measures are taken. The root causes of
 workplace accidents are typically carelessness, non-compliance with procedures and instructions, and
 not using personal protective equipment. Preventive measures initiated for workplace accidents in
 2023 include: vertical and horizontal lifeline projects, toolbox training sessions, lockout-tagout
 system, work permit system, near-miss reporting system, warning sign improvements, regular board
 of occupational health and safety meetings, and internal audits conducted by the headquarters. Fire
 suppression systems have been installed for incidents of ignition in biomass facilities.
- Slipping and Falling: These incidents occur due to reasons such as slippery floors and tripping over materials. As a preventive measure, toolbox training has been initiated. The frequency of workplace cleaning has been increased. Personal protective equipment suitable for slippery floors is being provided. Warning signs have been posted.
- Electric Shock: The lockout-tagout system has been implemented. The work permit procedure has been put into practice.
- Broken and Dislocated: It has arisen from situations such as carelessness, slippery floors and falls. The number of warning signs has been increased. Toolbox trainings are being conducted. Regular site inspections are being carried out.
- Skin injury: It usually occurs due to the incorrect use of equipment. Toolbox trainings are being conducted. Periodic inspections of the equipment are being performed.
- Foreign Object in the eye: It generally arises from not using personal protective equipment. Welding goggles and safety glasses have been provided and their usage is being monitored.
- Sprain: It occurs due to carelessness. Measures have been taken for level differences and pits in the floors.
- Cut: It usually occurs due to no using of personal protective equipment.
- Burned: Workplace accidents have occurred in biomass facilities due to hot ash. As an action, flameresistant work clothing is provided. Corrective activities have been undertaken in areas where accidents occurred.
- Illness: It is caused by seasonal illnesses. It has been documented as a workplace accident in the hospital. Training sessions are provided on outbreaks and seasonal illnesses.

- Poisoning: It has occurred due to employees not using the dust and gas masks provided. Occupational hygiene measurements are being conducted, and the use of personal protective equipment by employees is monitored. Ventilation systems have been installed in the isolation facility cabins.
- Inspector audit from Ministry of Labor Social Security was taken place in Bergama. There were 18 nonconformities were detected. The deadline of this nonconformities was 15 days. The studies for all nonconformities have been made.

5.5. Please provide information on any major developments and achievements related to H&S management during the reporting period. Please include new safety measures which have been introduced, safety awards which the project has received or safety programs/initiatives that have been introduced.

• The consultancy service for HAZOP (Hazard and Operability Analysis) which is used to make risk management to identify, evaluate, and control hazards and risks in complex processes has been having in all facilities. At the same time consulting firm gives training some employees to able to make HAZOP Analysis.



• A fire drill has been conducted at all of our facilities. All employees receive fire safety training.



• Environmental and chemical leak drills have been conducted at all of our facilities. All employees receive environmental training.



• In our facilities in Bergama, İnegöl, and Uşak, infirmaries have been established. The process is still ongoing for our facilities in Malatya and Aksaray.



• The explosion protection documents have been renewed, and training has been provided due to process changes at the Bergama, İnegöl, and Harmandalı facilities.



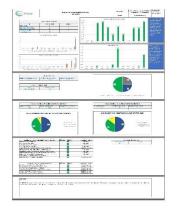
- At the İnegöl, Bergama, Harmandalı, Malatya, Ezine, and Balıkesir facilities, occupational hygiene measurements have been renewed due to process changes.
- A list of equipment requiring calibration for all facilities has been created. Monitoring is in place. Despite the calibration intervals for scales being every two years, verification is conducted every six months.



• The documentation system is managed through QDMS. The tracking and control of corrective and preventive activities, as well as their actions, are handled through QDMS. Management systems and QDMS training are provided to all employees.

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- Orientation training is provided to newly hired employees.
- Monthly toolbox training sessions, covering topics determined by the headquarters, have been initiated for all employees. Toolbox training sessions are conducted by process managers, HSE specialists.
- In accordance with integrated management systems, occupational health and safety committee meetings have started to be held monthly in all facilities, regardless of the number of personnel. Employee representatives and support staff participate in Occupational Health and Safety Committee meetings, ensuring that the views and suggestions of the employees are taken into consideration.
- Quality-HSE reports are prepared every three months and displayed on the HSE boards prepared in 2022, ensuring that employees are informed.





• In addition to mandatory training, employees have started to receive training on working in confined spaces, working with biological agents, working with chemicals, working at heights, and training on occupational accidents, near misses, and explosive environments.

6. Stakeholder Engagement

6.1. Please provide information either below in the table or in attachments on the implementation of the Project Stakeholder Engagement Plan (SEP), or equivalent, and summarize any interactions with stakeholders during the reporting period, including:

6.1.a. meetings or other initiatives to engages with formal stakeholders (e.g. authorities), members of the public or public organizations, civil society, communities, including vulnerable groups during the report period.

In our Bergama project, a public information meeting was held within the scope of the EIA process in September 2023.

6.1.b. any coverage in the media on environmental, health and safety and social issues related to the Project, and interaction with any environmental or other community groups.

No meetings or interactions took place.

6.1.c. interaction with environmental or other community groups.

We participated in the Coastal Cleaning Event organized by Gekader in 2023 as part of the World Environment Day on June 5th. We have announced this participation only through social media.

	Dates	Stakeholders	Nature of engagement and topics presented/discussed
Meetings	Webcast: 17.03.2023 11.05.2023 23.08.2023 14.11.2023 Over 100 phone meetings with retail investors throughout the year One-to-One meetings All throughout the year in 2023	Investment Banks, Asset Management Companies	Webcast Meetings, Company presented about the company, investment themes, one-to-one investor meetings
Public hearings	14.04.2023	All Shareholders	General Assembly Meeting https://www.kap.org.tr/en/Bildirim/1138543
Public/stakeholder events	Quarterly 13.03.2023 10.05.2023 21.08.2023 8.11.2023	Institutional Investors	Quarterly Financial Data Q4/22 https://www.kap.org.tr/en/Bildirim/1124120 1Q/23 https://www.kap.org.tr/en/Bildirim/1149868 2Q/23 https://www.kap.org.tr/en/Bildirim/1187862 3Q/23 https://www.kap.org.tr/en/Bildirim/1216026
Focus group discussions	-		
Information disclosure	All throughout the year in 2023	All Shareholders	https://www.kap.org.tr/en/sirket- bilgileri/ozet/8acae2c4780814e2017826e1e07318d8

Media coverage	-			1		
6.2. Have any new vulnerable people been identified who may be potentially affected by the Project? If yes,						

please summarize additional measures undertaken in order to identify, engage and address risks and impacts to vulnerable groups.

No - No application has been received/transmitted to Human Resources.

6.3. How many complaints or grievances did the Project (or existing facility, if applicable) receive from group members of the public or civil society organizations during the reporting period? Please indicate the stakeholder group and summarize the main issues raised in the complaints or grievances and explain how they were resolved:

There were no complaints from members of this group.

Compleint Cotegony	No. of Complaints			Summarize main issues, from which
Complaint Category	Closed	Open	Overdue	stakeholder group and resolution
Land/asset acquisition and				
compensation				
Environmental impacts				
Disturbance/nuisance				
Recruitment				
Community health, safety				
and security				
Service				
provision/disruption/quality				
Damage				
Behavior of company or				
company				
employees/contractors				
Gender based violence and				
harassment				
Other				
*Complaints which have been	closed o	r are op	en but still	unresolved outside of timeframe defined
in the complaints procedure				

If no complaints were received:

6.3.1. Does the Project/Client has a documented grievance procedure to address grievances from the public within defined timeframes?

Yes: No: 🗆

People communicate with us via direct message and corporate web site's communication tab (Communication Form). Demands are processed in external stakeholder complaint suggestion and request form. Requests are shared with related department, The communication process is followed up until the end of the process, afterward the relevant form is closed. Requests are generally consisting of advertisement collaboration, fair/summit request, job applications and various collaborations.

6.3.2. Is information on how to raise a complaint available publicly, and via which mechanisms? **Yes:** ⊠ No: □

Faced to Face (Community Liaison Officer; Public Meetings) ⊠ Printed Materials (e.g. Public notices; Leaflets) ⊠

Company Website/Social Media 🛛

Other (describe):

On our website, we have our contact information (address, telephone and corporate e-mail) and a contact box where they can write their messages.

6.3.3. Confirm how a complaint can be raised:

Face to Face ⊠ Complaint Boxes ⊠ Company Website/Social Media/Email ⊠ Community leaders/authorities ⊠ Telephone/Text/WhatsApp ⊠ Other (describe):

- Anyone who wants to voice their complaint has access to "Complaint Boxes" located in the facilities.
- People communicate with us via social media channels' direct message platform and corporate web site's communication tab (Communication Form). Demands are processed in external stakeholder complaint suggestion and request form. Requests are shared with related department, the communication process is followed up until the end of the process, afterward the relevant form is closed.
- Community leaders and authorities can deliver their or communities' complaints through face-to-face communication and telephone or text.

6.4. What information on environmental and social issues was put in the public domain during the reporting period (e.g., ESIA, environmental and social monitoring reports, Environmental, Social and Governance (ESG) reporting, etc.)? Please attach a copy or the link.

Sustainable Lease Certificate Issuance / All Shareholders / https://www.kap.org.tr/en/Bildirim/1136566

7. Water Use and Efficiency

7.1. Does the Project accommodate any environmental investments resulting in reduction of water use or improvement of water efficiency?

Yes: 🗆

No: 🛛

If yes, please complete sections 7.2.1. through 7.2.2.

7.2. Does the Project (or existing facility, if applicable) involve production or manufacturing with a high-water demand (greater than 5,000 m^3/day)?

Yes: 🗆

No: 🖂

If yes, please attach a recent water balance and complete sections 7.2.1 through 7.2.2.

7.2.1. Total volume of water drawn from water source(s) in m³ during the reporting period.

<u>Source</u>	Volume (m ³ /yr)
Wells	
Surface water	
Municipal supply	
Recycled/reused	
Other (name)	
TOTAL Annual Volume	

7.2.2. Total units of production/manufacturing (please define units in the response).

8. Greenhouse Gas (GHG) Emissions

8.1. Does the Project accommodate any climate mitigation finance resulting in reduction of GHGs? Yes: □

No: 🖂

If yes, please complete section 8.3

8.2. Is the Project associated with direct and indirect GHG emissions of more than 25,000 tonnes/year CO₂-equivalent?

Or

Is the Project associated with a decrease in direct and indirect emissions at the existing facility of more than 25,000 tonnes/year CO₂-equivalent?

The project is associated with a decrease in direct and indirect emissions at the existing facility of more than 25,000 tonnes/year CO2-equivalent.

Please check attached GHG emissions reduction table. (EBRD AESR_GHG Emissions Table.pdf)

8.3. Please specify the following in case the Project encompasses any climate mitigation investments, leading to reduction of GHGs.

- GHG reduction technology used (please specify type of the technology, purpose of use, capacity installed):
- Physical use of technology (annual production/performance, average load factor, annual numbers of hours in use):
- Annual energy use by energy carrier (electricity, gas, heat, other fuels please specify the annual quantity and unit per energy carrier):
- Annual GHG emissions in tonnes CO_{2eq} per annum (if known):

9. Land Acquisition

9.1. Is there a Resettlement Plan for the Project?

Yes: 🗆

No: 🛛

9.2. Was there any land acquisition associated with the Project during the reporting period?

Yes: 🖂

No: 🗆

If yes, please answer the following questions:

9.2.1. Was the land acquired through amicable agreements (negotiated settlements) or through a court process (e.g., expropriation or other compulsory land acquisition process)? Please provide details below.

Negotiated settlement:

MERSIN ELEKTRIK-EZINE: Approximately 5,000 m2 of space was rented from Ezine District Governorate as additional fuel storage area.

DOĞU STAR-İNEGÖL: Within the scope of the İnegöl-2 project, 2907.06 m² of forestland Forest permission was obtained for the Energy Transmission Line in the area.

Court Cases: -

Please summarize the reasons for the court cases: -

9.2.2. Number of communities affected: none

9.2.3. Number of people affected: none.

		- <u>-</u>					
Landowners:	Men:	Women:	Other:	_			
Formal Land Users:	Men:	Women:	Other:	-			
Informal Land Users:	Men:	Women:	Other:				
9.2.4. Permanent land u							
Number of parcels: unre Area affected:	gistered are	28					
9.2.4. Temporary land us	se:						
Number of parcels:							
Area affected:							
9.2.5. Have any persons	been physic	cally displaced	?				
Yes: 🗌							
No: 🛛							
If yes, how many?							
development initiatives initiatives undertaken by whether the community supported.	le developn such as (env the Client and/or civi	nent program vironmental ar during the rep I society orgar	nd social invo orting perio izations has	es please summarize the sustainable estment projects or community development d, and associated expenditure: Comment on input into selection of the initiatives to be rment of women. In alignment with this goal,			
we have proudly become order to foster an enviro Furthermore, in our com	e signatorie nment that mitment to	s to the United promotes equal advance won	d Nations Wo uality, inclus nen's leaders	omen's Empowerment Principles (WEPs) in ivity, and women's leadership in the workplace. ship in the professional sphere, we have joined rises 33.3% women members.			
United Nations \30% Club	Vomen Emj	powerment Pr	inciples				
11.Green Econo	my Trans	sition (GET)					
11.1. Does the Project en Yes: □ No: ⊠ If yes, please provide the	·		ronmental fi	nance related to wastewater treatment?			

11.1.1. Type and capacity of technology used:

11.1.2. Volume of wastewater treated, or wastewater avoided or reduced, in m³ per year:

11.1.3. Any other information (e.g., effluent quality as per EU classification):

11.2. Does the Project encompass any green environmental finance related to solid waste? Yes: □ No: ⊠

If yes, please provide the following information:

11.2.1. Type and capacity of technology used:

11.2.2. Volume of waste processed, or waste disposed, recovered, recycled or reduced, in tonnes per year:

11.2.3. Any other information (e.g., category of waste as per EU waste classification):

11.3. Does the Project encompass any green environmental finance related to material efficiency or the circular economy?

Yes: 🗌 No: 🖂

If yes, please provide the following information:

11.3.1. Type and capacity of technology used:

11.3.2. Amount of materials (by type of material) processed, recovered, recycled or reduced, in tonnes per year:

11.3.3. Any other information (e.g., type of materials and type of circular economy activity as per EU circular economy classification):

11.5. Does the Project encompass any other nature-positive or nature-based solutions investments, not accounted for above?

Yes: 🗌 No: 🖂

If yes, please provide a brief description including quantitative aspects (e.g., type of nature positive activity/technique) or quantitative impacts per year: