

ENERJISA ENERJİ A.Ş.

CORPORATE STAKEHOLDER ENGAGEMENT PLAN

October 2019



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1 INTRODUCTION

1.1 Overview

This Corporate Stakeholder Engagement Plan (SEP) provides a framework outlining the requirements and applied processes for stakeholder engagement and public consultation, stakeholder identification and grievance mechanism planned by Enerjisa Enerji A.Ş. (“Enerjisa” or the “Company”) at a corporate level. This SEP conforms to the European Bank for Reconstruction and Development (EBRD) Performance Requirements (PRs) which recognise the importance of an open and transparent engagement between the Company, its employees, local communities directly affected by the Company operations and, where appropriate, other stakeholders as an essential element of good international practice (GIP) and corporate citizenship¹.

Each of our distribution companies will develop a standalone SEP in line with the principles defined in this corporate SEP which should include grievance mechanisms.

This document is intended for public disclosure and will be made available in the Turkish and English language by Enerjisa.

Please do not hesitate to contact us in case of any queries, comments or suggestions that you may have in relation to this SEP or to our operations using below contact details.

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1.2 Objectives of Stakeholder Engagement Plan (SEP)

This Stakeholder Engagement Plan provides a framework for stakeholder engagement; it has been designed so that Enerjisa can demonstrate engagement that is effective, meaningful, consistent, comprehensive, coordinated and culturally appropriate, in line with all the relevant legal and regulatory commitments and good international industry practice.

Stakeholder engagement is an ongoing process and as such, this SEP is a ‘living document’ that will be updated and adjusted as we continue to grow.

The primary objectives of stakeholder engagement are as follows and are illustrated in **Figure 1** below:

- To ensure that adequate and timely information is provided to stakeholders;
- To provide sufficient opportunity to stakeholders to voice their opinions and concerns such that if relevant these might be taken into account in our Company decisions;

¹ <http://www.ebrd.com/who-we-are/our-values/environmental-and-social-policy/performance-requirements.html>

- To establish a relationship and form of communication between our Company, government regulators, affected communities and other parties interested in our operations and impacts; and
- To focus on issues that are required to bring our operations into compliance with our investors' requirements including those of the EBRD.

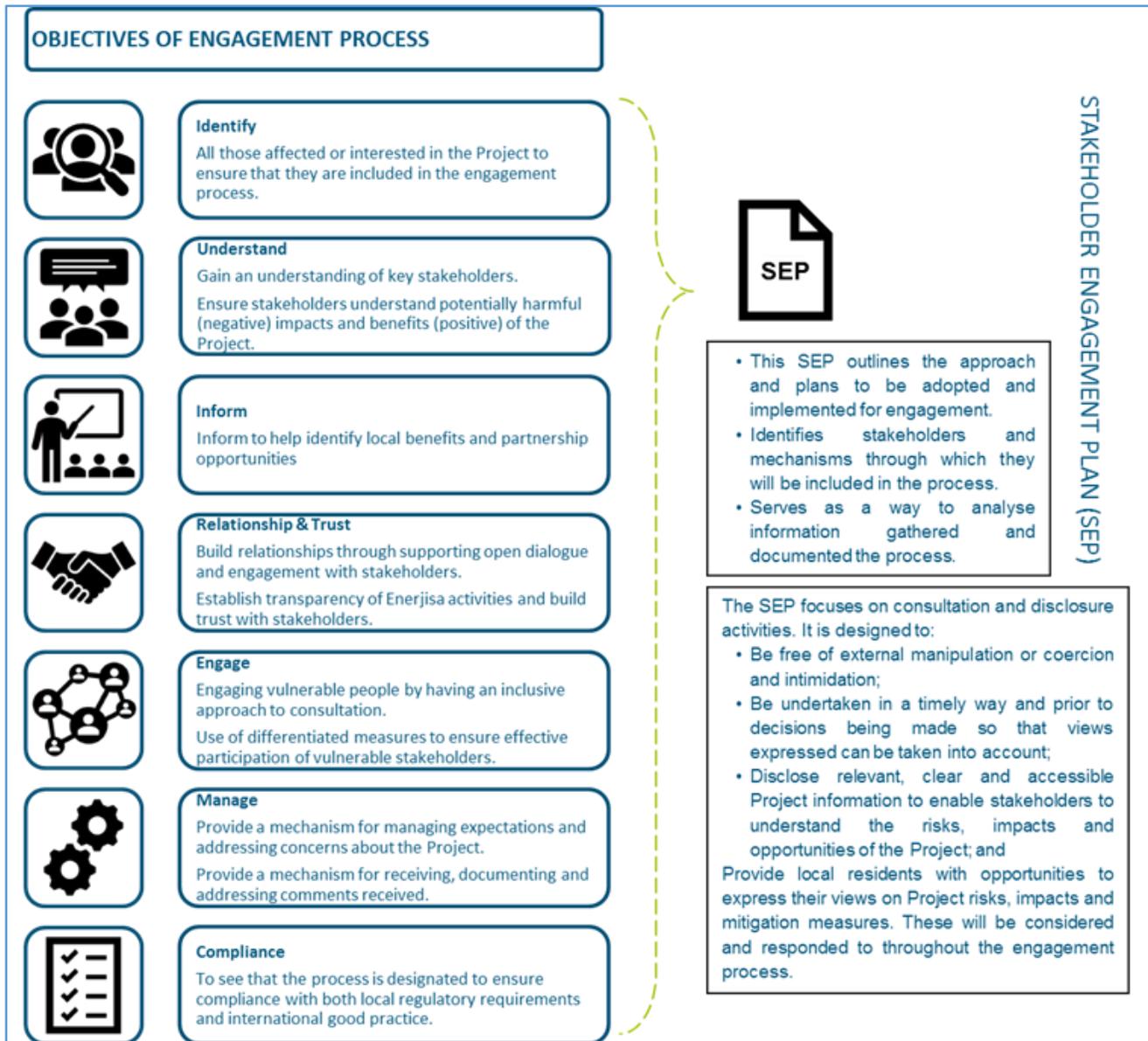


Figure 1. Objectives of Engagement Process

1.3 Who We Are?

We are the leading company in Turkey's electricity sector. As Enerjisa Enerji A.Ş., we are engaged in electricity distribution operations through Başkent Elektrik Dağıtım A.Ş. ("Başkent EDAŞ") in the Başkent region which covers the provinces of Ankara, Zonguldak, Kastamonu, Kırıkkale, Karabük, Bartın and Çankırı; through İstanbul Anadolu Yakası Elektrik Dağıtım A.Ş. ("AYEDAŞ") in the AYEDAŞ Region, which covers districts on the Asian side

of İstanbul; and through Toroslar Elektrik Dağıtım A.Ş. (“Toroslar EDAŞ”) which covers the provinces of Adana, Gaziantep, Mersin, Hatay, Osmaniye and Kilis (**Figure 2**).

We reach out to a population of around 21 million in 14 cities with a team of comprising around 10,000 employees. As of December 31, 2018, we have around 11 million network connections, approximately 26% of all network connections in Turkey and 9.6 million retail customers, about 23% of the retail electricity market. We distribute electricity in 14 provinces spanning across approximately 110,000 square kilometres.

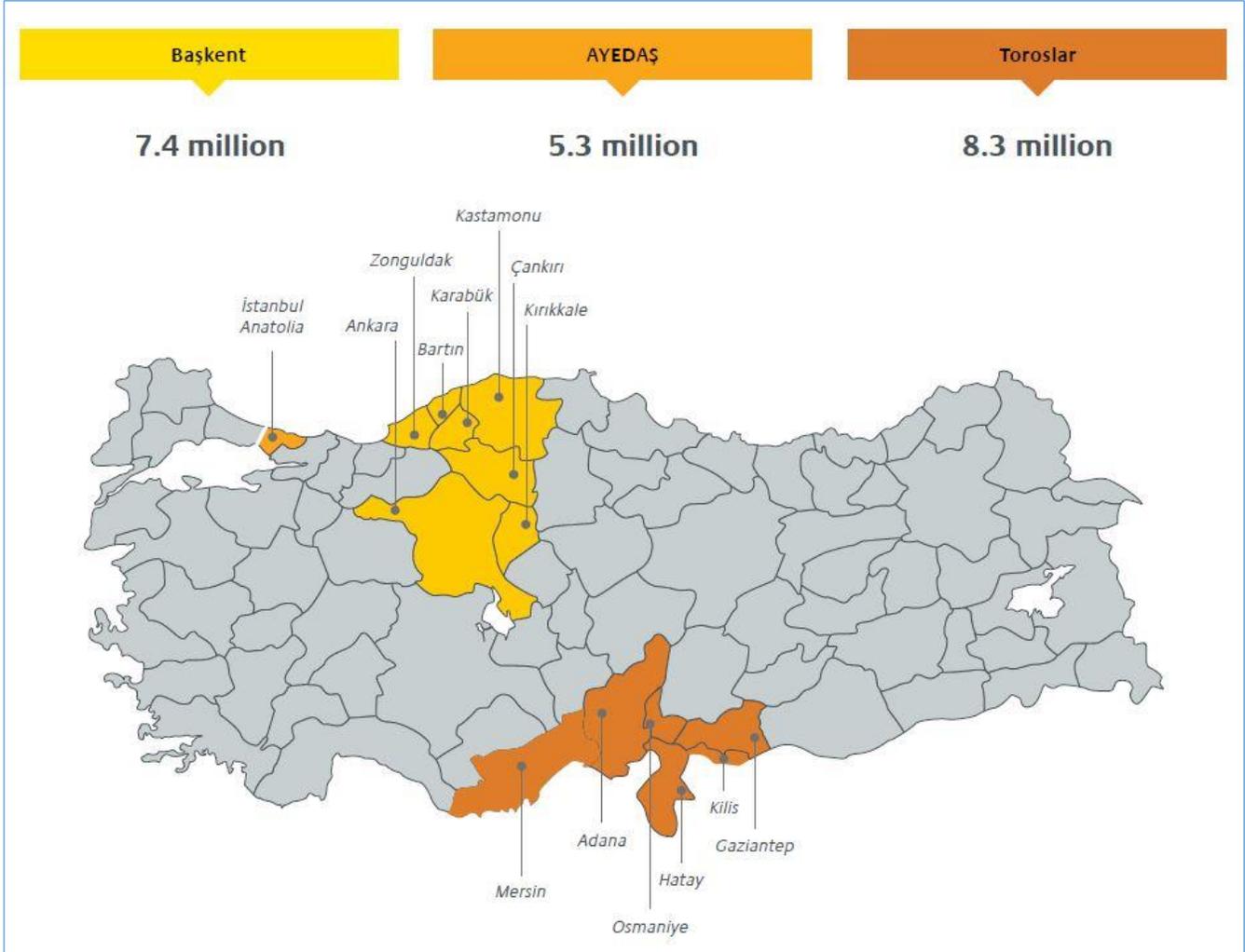


Figure 2. Electricity Distribution Regions of Enerjisa

1.4 Enerjisa And Stakeholder Engagement Policy

As Enerjisa we have policies, procedures and processes in terms of information disclosure and stakeholder engagement as presented below:

- Enerjisa Corporate Communication Procedure: Enerjisa Corporate Communication Procedure entered into force on 28.02.2009 and was reviewed on 27.01.2017. The procedure defines communication strategy including press relations, corporate social responsibility and communications through digital and social media;

- Başkent EDAŞ, AYEDAŞ, Toroslar EDAŞ Application Management Procedure from Digital Channels entered into force on 22.11.2018;
- Başkent EDAŞ, AYEDAŞ, Toroslar EDAŞ Application Management Procedure from Written Channels entered into force on 06.11.2018;
- Enerjisa distribution companies are certified for ISO 10002 Customer Complaint Management Process;
- Corporate Social Responsibility (CSR) management is carried out in accordance with the Corporate Communication Procedure. The Procedure defines Enerjisa's corporate social responsibility areas as education, environment-society and energy.

In line with our corporate processes, we have also developed this SEP which is an action plan drawing the framework of the factors that are important for our interaction with stakeholders and sets out paths for engagement. The SEP aims to present a transparent, inclusive and responsive implementation in a cooperative manner in line with the existing procedures in place. The SEP also provides a framework to be rolled-out to our distribution companies to ensure the effectiveness of stakeholder engagement and grievance resolution practices.

This SEP has been developed in accordance with the Performance Requirement 10 of the European Bank for Reconstruction and Development (EBRD PR10) on Information Disclosure and Stakeholder Engagement. SEP is a living document and will be monitored, reviewed and updated by on a regular basis.

1.5 Project Background

Turkey's electricity distribution business requires vast amount of investments due to growing electricity demand. EMRA, in consultation with distribution companies, sets investment targets for a given 5-year implementation period (e.g. for 3rd implementation period 2016-2020) and monitors investments during each implementation period.

The European Bank for Reconstruction and Development currently is to provide a senior unsecured term loan (the "Loan") to Enerjisa for capital expenditure investments of Başkent Elektrik Dağıtım A.Ş., İstanbul Anadolu Yakası Elektrik Dağıtım A.Ş., and Toroslar Elektrik Dağıtım A.Ş. as required by EMRA to be made during the calendar year 2019 and/or 2020 (the "Project"). In line with investment target set by EMRA and Enerjisa's 2019 investment plan, the proposed Loan will enable Enerjisa to implement a part of the capex investments required by EMRA for the 3rd implementation period of 2016-2020. The Project will be comprised of network investments; environment, safety and other obligatory investments; grid operating system investments; meter investments; and other (buildings, information technology (IT), etc).

2 LEGISLATIVE BACKGROUND

2.1 National Legislation

Turkish Environmental Impact Assessment (EIA) Regulation includes provisions for environmental impact assessment, public consultation and disclosure of project information for projects listed in annexes of the Regulation. Electricity distribution lines and relevant facilities are not covered under the annexes of the Turkish EIA Regulation; hence, Enerjisa operations are not subject to national EIA requirements. Accordingly, no stakeholder engagement has been required according to Turkish legislations.

Notwithstanding, due to international financing and as best industry practice, Enerjisa is committed to make sure that the Project will comply with the requirements of the EBRD Environmental and Social Policy. According to best practice and the EBRD performance requirements, Enerjisa is offering consultation opportunities for stakeholders as described in the following sections. Enerjisa will appropriately engage such stakeholders on environmental and social issues that could potentially affect them through a process of information disclosure and meaningful consultation, on an ongoing basis during implementation.

Enerjisa strives to fulfil its responsibilities towards the environment, the public and customers in their service region. The primary goal is to ensure quality and continuous services, with due respect to the environment and by protection of health and safety of the workers.

2.2 International Standards We Seek to Meet

Enerjisa is committed to implementing a Stakeholder Engagement Plan in line with the EBRD Performance Requirements. In particular reference is made to PR 1, 2 and 10:

PR 1: Assessment and Management of Environmental and Social Impacts and Issues - this PR establishes the importance of integrated environmental, social and labour assessment and a Company's management of environmental, social and labour performance throughout the life of its operations and requires the following:

- A successful and efficient Environmental and Social Management System (ESMS) which allows for meaningful engagement between our Company, our workers and the affected and interested stakeholders *“requires a methodical systems approach comprising planning, implementing, reviewing and reacting to outcomes in a structured way with the aim of achieving a continuous improvement in performance management.”*
- The identification of and planning to engage with stakeholders in a meaningful manner to take their views and concerns into consideration in planning, implementing and operating the operation in accordance with PR 10.

PR 2: Labour and Working Conditions - this PR recognises that a Company's workforce is “a valuable asset, and that good human resources management and a sound worker-management relationship based on respect for workers' rights, including freedom of association and right to collective bargaining, are key ingredients to the sustainability of business activities”. In particular this PR addresses:

- Non-discrimination or retaliation against workers belonging to worker organisations / Unions. It requires our Company to engage with such workers' representatives or Unions and provide them with information needed for meaningful negotiation in a timely manner.
- The need to engage with migrant workers and to ensure that they are engaged on substantially equivalent terms and conditions to non-migrant workers carrying out the same work.

PR10: Information Disclosure and Stakeholder Engagement - EBRD Performance Requirements (2014) is the specific standard of relevance, in particular:

- Information Disclosure of relevant Company/operational information helps stakeholder understand the risk, impacts and opportunities. The information will be disclosed in the local language(s), and in a manner that is accessible and culturally appropriate.
- The SEP is tailored to take into account the main characteristics and interest of the affected parties, and the different levels of engagement and consultation that might be appropriate.
- We are required to conduct stakeholder engagement on the basis of providing local communities that are directly affected by the Project and other relevant stakeholders with access to timely, relevant and accessible information in a culturally appropriate manner and free of manipulation, coercion or intimidation.
- Stakeholder engagement will involve stakeholder identification and analysis, stakeholder engagement planning, disclosure of information, consultation and participation, grievance mechanism, and ongoing report to relevant stakeholders.
- The nature and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential adverse impacts on the affected communities, the sensitivity of the environment and the level of public interest.
- We are required to define clear roles, responsibilities and authority as well as designate specific personnel to be responsible for the implementation and monitoring of stakeholder engagement activities.
- Our Company needs to be aware of and respond to stakeholders concerns in a timely manner via internal and external grievance mechanisms.

3 STAKEHOLDER IDENTIFICATION AND ANALYSIS

Enerjisa has identified priority areas that will guide its sustainability investments through a participatory stakeholder analysis and in accordance with the AA1000 AccountAbility Stakeholder Engagement Standard. As part of the analysis, the expectations of Enerjisa employees and the insights of our external stakeholders, including international organisations, financial institutions, affiliates, business partners and public institutions, were collected. In addition, Enerjisa obtained employee opinions through a focus group workshop. An online questionnaire was used to get external stakeholders’ opinions. Following the collection of data, the responses received from 51% of stakeholders were assessed based on the external trends that lead to the energy and distribution/retail sector.

Among the external trends Enerjisa considered the global risks outlined by the World Economic Forum, insights that will define the future of the electricity industry, industry-specific material issues defined by Sustainability Accounting Standards Board (SASB) and Sustainable Development Goals. While evaluating the priority of each area for Enerjisa, the strategy and targets of Enerjisa together with the strategies of its main shareholders, Sabancı Holding and E. ON were addressed and opinions of the senior management, consisting of Enerjisa Enerji A.Ş. Leadership Team members were taken. In addition, Enerjisa draw upon impact analysis methodology, which is recommended by SASB in determining priority issues, allowing to address each issue in terms of various impacts and opportunities. Enerjisa then evaluated significant risks and opportunities concerning finance, law, innovation and competition using this method, which is important for an integrated approach. As a result of the study, Enerjisa put forward priority issues matrix, comprising high priority and very high priority issues.

The methodology employed during the stakeholder identification and analysis process is outlined in **Figure 3**. The scope of stakeholder analysis is presented in **Table 1** below.

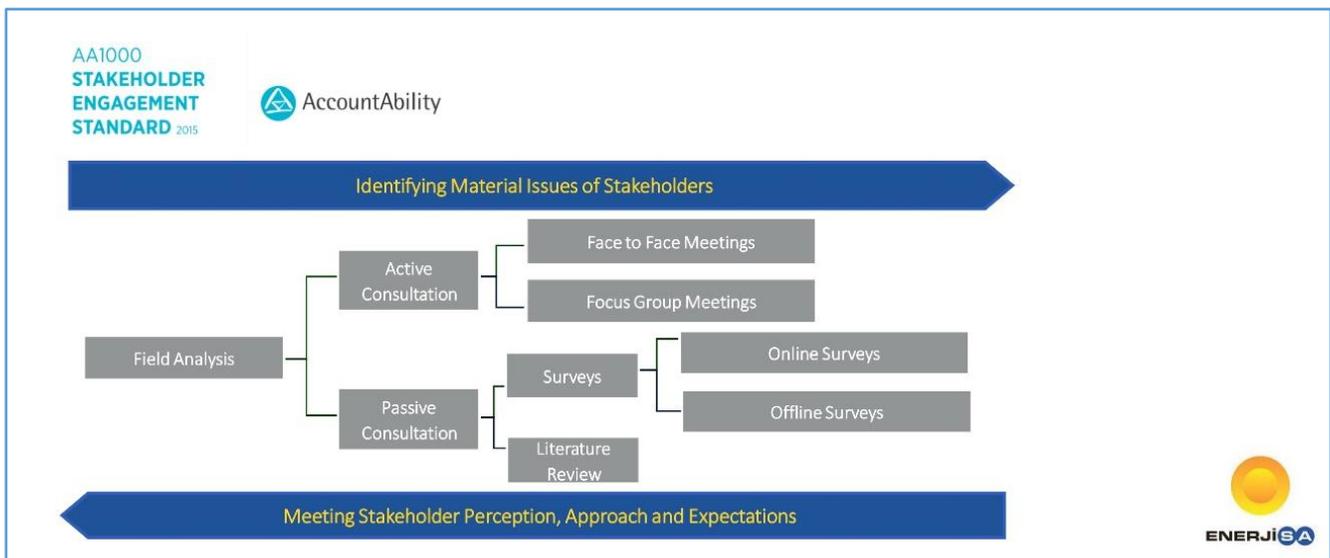


Figure 3. AA1000 Stakeholder Engagement Process

Table 1. Scope of Stakeholder Analysis

Stakeholder Group	Stakeholders	Tools	Methodology
External stakeholders	<ul style="list-style-type: none"> Analysts Press Credit Rating Agencies Think Tanks Financial Institutions Shareholders Public Institutions and Regulatory Authorities Customers Competitors Unions Non-Governmental Organisations (NGOs) Suppliers and Business Partners International Organisations Universities Investors Local Governments 	<ul style="list-style-type: none"> Stakeholder Analysis External Trend Analysis 	<ul style="list-style-type: none"> Active Consultation (online surveys, research, etc.) Literature Review
Internal stakeholders	<ul style="list-style-type: none"> Employees Subsidiaries Senior Management 	<ul style="list-style-type: none"> Analysis of Enerjisa Enerji Strategy and Targets Analysis of Sabancı Holding Strategy Analysis of E.ON Strategy SASB Four Factor Impact Analysis 	<ul style="list-style-type: none"> One-on-one Meetings Focus Groups Online Surveys

Following the analysis of its stakeholders, Enerjisa has identified the communication platforms and methods, communication frequency as well as target and evaluation criteria to measure the success of stakeholder engagement as part of the topics highlighted during the stakeholder analysis (**Table 2**):

Table 2. Enerjisa Stakeholders List, Communication Methods, Targets and Successful Evaluation Criteria

Stakeholder Group	Stakeholder Type	Stakeholder Communication Platforms and Methods	Communication Frequency	Targets and Successful Self-Evaluation Criteria
Analysts	External	Meetings, conferences, phone calls, quarterly investor teleconferences, analyst informing activities, podcasts, webcasts, Investor Relations website	Continuously	<ul style="list-style-type: none"> Increasing transparency Informing market about the Company Company valuation reports reflecting the fair value

Stakeholder Group	Stakeholder Type	Stakeholder Platforms and Methods	Communication Frequency	Targets and Successful Self-Evaluation Criteria
				<ul style="list-style-type: none"> Increasing Company credibility Financial sustainability
Press	External	Sponsorships and sectoral events Regular/irregular press releases, press conferences, interviews	Year-round	<ul style="list-style-type: none"> Informing public accurately Increasing Company reputation and brand value Building strong relations with press members
Credit Rating Agencies	External	Meetings, conferences and phone calls	Once a year	<ul style="list-style-type: none"> Increasing transparency Generating a fair value for Company's equity Increasing company credibility Financial sustainability
Financial Institutions	External	Meetings, conferences and phone calls	Continuously	<ul style="list-style-type: none"> Increasing transparency Increasing Company credibility Financial sustainability
Shareholders	External	Board of Directors meeting, committee meeting, quarterly investor teleconferences, General Assembly, Investor Relations	Continuously	<ul style="list-style-type: none"> Managing sustainability risks Adopting a target-oriented management approach Sharing environmental performance transparently Compliance with Corporate Governance Principals Financial sustainability
Government Agencies and Regulatory Bodies	Internal	Meetings, conferences and phone calls	Continuously	<ul style="list-style-type: none"> Improving stakeholder engagement Increasing transparency in customer communication Financial sustainability
Customers	External	Customer Service Centers (CSC), Enerjisa Operation Centers (EOC), alternative sales channels, call centers, digital channels (Mobile application, website), customer representatives social media channels, short message service (SMS) and customer satisfaction surveys	Continuously	<ul style="list-style-type: none"> Developing customer-oriented solutions Increasing customer satisfaction Enabling a continuous supply of energy from renewable energy sources Ensuring data security Increasing smart technologies
Unions	External	Face to face interview	Once a year	<ul style="list-style-type: none"> Providing uninterrupted and accessible energy

Stakeholder Group	Stakeholder Type	Stakeholder Platforms and Methods	Communication Frequency	Targets and Successful Self-Evaluation Criteria
				<ul style="list-style-type: none"> Ensuring leadership on energy efficiency and increasing awareness
Non-Governmental Organisations	External	Conferences, management meetings, focus group activities	Continuously	<ul style="list-style-type: none"> Ensuring leadership on energy efficiency and increasing awareness
Suppliers and Business Partners	External	Joint projects	Continuously	<ul style="list-style-type: none"> Establishing alternative supply infrastructures for uninterrupted energy in distribution regions Ensuring customer satisfaction and continuous energy supply
International Organisations and Initiatives	External	Joint projects	Continuously	<ul style="list-style-type: none"> Ensuring leadership on energy efficiency and increasing awareness
Universities	External	Joint projects	At least four times a year	<ul style="list-style-type: none"> Stakeholder collaboration Attracting qualified talents Investment on R&D
Investors	External	Roadshows, meetings, teleconferences, quarterly investor teleconferences, podcasts, webcasts, General Assembly, Investor Relations website	Continuously	<ul style="list-style-type: none"> Managing sustainability risks Adopting a target-oriented management approach Sharing environmental performance transparently Compliance with Corporate Governance Principals Financial sustainability
Local governments	External	Whatsapp Mukhtar Support Line, regular meetings with the mukhtars and satisfaction surveys	Continuously	<ul style="list-style-type: none"> Building stakeholder dialogue Transparency in customer communication
Employees	Internal	IKON, mobile applications, Intranet, employee engagement focus groups, team leaders information meetings, CEO briefing meetings, management meetings, human resources meetings (happy hour), trend talks	Continuously	<ul style="list-style-type: none"> Attracting qualified talent Broadening the knowledge and skills of employees, primarily blue-collar employees Increasing employee loyalty Investing in smart technologies Increasing OHS investments
Subsidiaries	Internal	Meetings, Board meetings	Continuously	<ul style="list-style-type: none"> Promoting leadership in the use of new technologies

Stakeholder Group	Stakeholder Type	Stakeholder Platforms and Methods	Communication Frequency	Targets and Successful Self-Evaluation Criteria
				<ul style="list-style-type: none"> Managing sustainability risks Financial sustainability

For more information on stakeholder relations, please refer to Enerjisa’s Sustainability Report (2018) available at:

https://www.enerjisainvestorrelations.com/Media/Default/pdf/FR/Enerjisa_SRD_ENG_1006.pdf

It should also be noted that Enerjisa Distribution Companies have been certified by ISO 14001:2015 Environmental Management System standard. In accordance with Clause 4.2 of ISO 14001:2015, Başkent EDAŞ, AYEDAŞ and Toroslar EDAŞ have identified their external and internal stakeholders and listed their needs and expectations within the context of Environmental Management System. Responses and actions to satisfy the needs and expectations of the stakeholders are managed within Environmental Management System.

4 SUMMARY OF STAKEHOLDER ENGAGEMENT ACTIVITIES BY ENERJISA

Enerjisa believes in the importance of open, transparent and honest communication with stakeholders and care about their opinions and expectations. To this end, we continuously communicate with our stakeholders, both internal and external, through various channels as outlined in **Table 2**.

4.1 Internal Stakeholders

4.1.1 Employees

Our human resources are one of the most important assets that make us the leader in the industry. We aim to ensure the sustainability of our business and to attract well-equipped individuals to the industry with the vision of becoming the most desirable employer. From this point of view, we offer our employees a positive work environment where they can work confidently and improve themselves. The foundation of Enerjisa human resources management is to get strengthened by drawing upon our employees' strengths in order to provide excellent service continuously. We intend to develop a positive organisational climate, communication and culture within our company in line with our human resources practices. Therefore, we focus on issues such as developing the leadership qualities of employees and providing training, development and offering equal opportunities to all employees.

We conduct employee loyalty surveys annually to measure employee loyalty and ensure that we provide the best working conditions. The employee loyalty scores in 2018 for Enerjisa and its electricity distribution companies were 55% and 59%, respectively.

It is important for us that our employees maintain a healthy work-life balance, and we support them accordingly. In this scope, we have taken steps in order to implement flexible working model, dress code and remote working in our headquarters. In 2018, we launched the flexible working model in our headquarters that our employees can be able to pick their working hours. We have implemented a pilot scheme for remote working model. With this model, we intend to increase employee productivity. We are also planning to implement this model in our other headquarters. We launched Avita Employee Support Program in 2018, and through this program, we ensure that employees and their families receive counseling on psychological, medical, financial, and legal matters.

You can find out more about our engagement with our employees in our Sustainability Report available at:

<https://www.enerjisainvestorrelations.com/en/reports-presentations/sustainability-reports>

4.1.2 Engaging Worker Organisations

Throughout 2018, Enerjisa Enerji also successfully renewed the collective bargaining agreement, which includes a large part of all employees for the upcoming period until 2021, ensuring visibility for all parties and allowing employees to participate in the success of the company.

4.1.3 Working with Contractors and Suppliers

Our suppliers help us improve and strengthen our distribution network, get administrative services, construct and renovate buildings and maintain and repair our materials and software. In 2018, all our 599 suppliers were local. We provide training to certain suppliers who are critical to our operations about regulation changes and technical issues regarding procurement. We also offer training and organise meetings before inviting tenders to decrease any uncertainty our suppliers may be experiencing as a result of changes in our procurement processes, regulations (EMRA Regulation on Procurement) or our company policy.

In 2018, we designed our supply chain flow to make our procurement processes more systematic, to increase internal customer satisfaction and to ensure that supply chain processes are faster, more efficient and in compliance with procedures and regulations. With this system, we aim to make our supply chain more transparent and measurable, ensuring that all documents required by the procurement processes can be checked by the relevant units with the help of control points specified by the system.

4.2 External Stakeholders

4.2.1 Engaging with State and Local Authorities

Government agencies, regulatory bodies and local governments are the main stakeholders that directly affect our business. As the leading company in the industry, we are aware that the development of a regulatory framework is necessary to encourage investments, efficiency and quality in an effort to ensure a reliable and cost-effective network infrastructure in Turkey. With this awareness, we contribute to the process by keeping in touch with government agencies and regulatory bodies. Our relations with the public are based on the principles of transparency, equality and impartiality. Our relationships with public institutions are independent of any political view and managed as required by our corporate identity.

We care about establishing bilateral communication based on trust with our stakeholders. As part of the annual Enerjisa Local Governments Communication Plan, we pay regular visits to governors, district governors, municipalities and Mukhtars (local authority: officially elected neighbourhood representative) in our service regions. As a result of our face-to-face interviews, we obtain information about the expectations of public institutions and we have the opportunity to improve our business processes through their requests and opinions. In this respect, we organised meetings with stakeholders in the regions we operate, in particular with local authorities (Mukhtar), in 2017 and 2018.

4.2.2 Engaging with Media

We use media as a tool to strength our relations with customers and community. All necessary information on our operations spread through local and national media outlets such as newspapers, magazines, TV channels, etc. As the region we operate consists of huge geography, information diffusion has different characteristic according to the cities. It is our job to specify the right tool to inform with the correct and necessary information. In order to do that, we monitor the media and public reactions closely and develop different strategies. We build our relations with the media on correct information, transparency and trust pillars. Communication Department manage both verbal and written communication with media.

4.2.3 Engaging with Non-Governmental Organisations (NGOs)

Enerjisa is a member of various organisations where sector specific developments are discussed on a continuous basis. The list of organisations Enerjisa is a member of is presented in **Table 3** below:

Table 3. List of Member Organisations

Member Organisations
Association of Distribution System Operators - ELDER
Turkish Industry and Business Association - TUSIAD
International Investors Association - YASED
Solar Energy Investors Association - GÜYAD
Turkey Cogeneration Association - TURKOTED
Business Council for Sustainable Development Turkey - SKD
Global Investor Relations Associations - TUYID
EUROGIA2020

4.2.4 Engaging with Customers

We consider access to energy as a natural human right. We aim to provide the best service in energy supply by continuously enhancing our products and services. We provide energy to more than 21 million people in our energy distribution and sales operations. With our customer-focused approach, we develop exclusive services and products that keep up with the constantly digitalizing world and utilize the cutting-edge technology.

We manage customer satisfaction and communication in line with our internal policies and international standards. With the ISO 10002 Customer Satisfaction standard that we have adopted, we provide services at international standards. In this context, we provide training to enable our employees to respond to customer expectations in the fastest and most efficient way. In 2018, we provided training to more than 450 employees in the areas of customer orientation and customer satisfaction.

Since communication is a priority to ensure satisfaction, we communicate with our customers through a variety of channels. While increasing the variety of communication channels we also update them according to the needs of our customers in order to resolve their issues and complaints as soon as possible. Accordingly, we make use of communication channels such as petition, SMS, e-mail, registered e-mail (KEP), telephone and internet, as well as our mobile applications Enerjisa Mobil and Mobile 186, social media, corporate şikayetvar.com account, WhatsApp Mukhtar Support Line and SMSs. We have a wide service network with 41 customer service centers, 83 transaction centers and a 24/7 call center. We manage 2 million transactions per year, including subscription, invoices, applications and complaints. In addition to the diversity of the communication channels we create for our customers, we also bring our services to our customers' doorsteps. We have mobile service vehicles in the Başkent and Toroslars regions for use in areas that are far away from the transaction centers. We also perform regular customer satisfaction surveys for evaluating customer journeys at our customer channels and to improve customer experience.

As the leader energy provider in Turkey, Enerjisa guides customers to make savings based on daily household activities, considering the concept of sustainability in environment & climate and energy supply security. In that

context, Enerjisa has started a national awareness campaign in 2017, which is called 'Save Your Energy'. The campaign includes TV, digital and printed media commercials, as well as a micro website (enerjinikoru.com) that evaluates the saving habits via a gamified survey.

Enerjisa also performs various corporate social responsibility projects in line with its corporate communication procedure. Through one of the major CSR projects conducted by Enerjisa, namely the 'Energy Efficiency Trainings' social responsibility project for the elementary school students with the motto 'I'm Protecting the World's Energy' since 2010, the importance of energy efficiency is being explained to the children via stage plays. To date, Enerjisa has reached 250,000 students in 550 schools.

Enerjisa also reaches children via www.enerjimikoruyorum.org web site. The children visiting the web site can access information about the energy resources of the world through animations and vocalisation prepared specifically for children and they can also learn how they can protect the limited resources of the world alongside an enjoyable game. Information on corporate social sustainability projects is disclosed to public at the corporate web site: <https://www.enerjisa.com.tr/en/enerjisa/about/social-responsibility>.

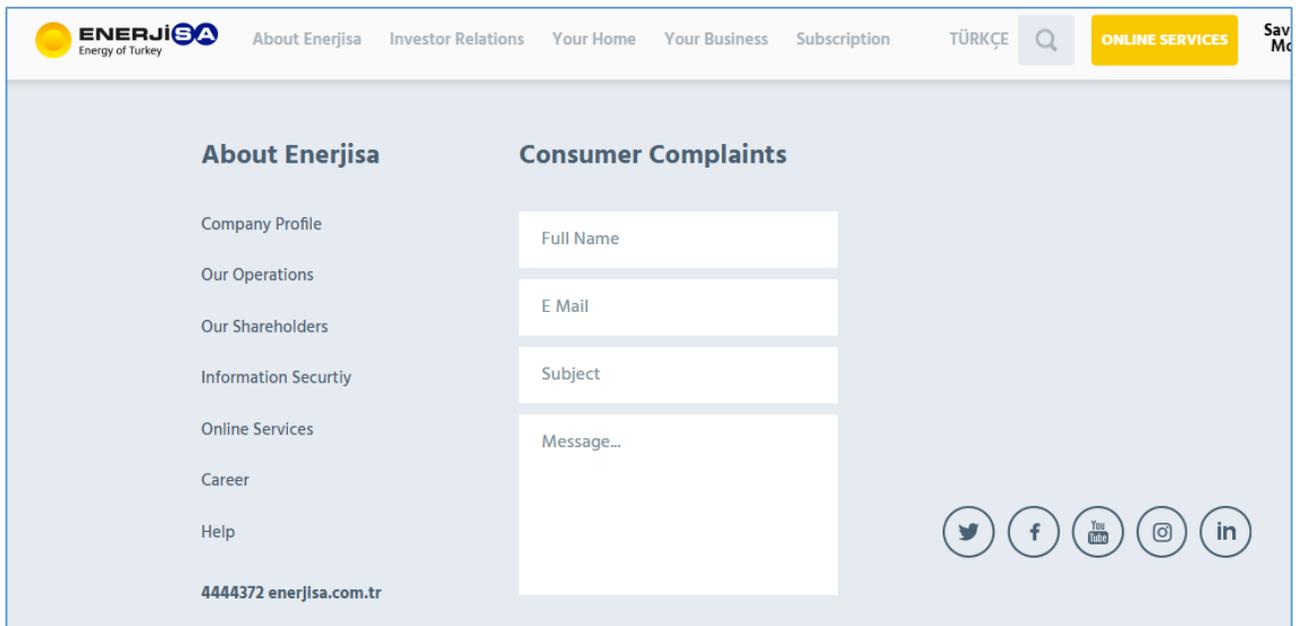
5 GRIEVANCE MECHANISM

5.1 Existing Grievance Mechanism

Enerjisa has an external grievance mechanism in place. The channels listed below are used for receiving grievances for electricity distributions of Enerjisa:

- 186 call centre,
- Mobile 186 application,
- Social media accounts (Twitter, Facebook),
- ‘Şikayetvar’ website
- The corporate website,
- E-mail,
- Government offices / Open door (Written grievances from public institutions),
- Petitions,
- Enerjisa Operation Centers,
- Whatsapp mukhtars support line.

Complaints are coded as complaints on behaviour (employees of Enerjisa) and other complaints. Other complaints are evaluated according to the related category and directed to the related unit. Responses are sent to the applicant via the communication channel within 15 working days. The complaint submission form available at the corporate web site is shown below in **Figure 4**:



The screenshot displays the Enerjisa corporate website's 'Consumer Complaints' form. The website header features the Enerjisa logo (Energy of Turkey) and navigation links: 'About Enerjisa', 'Investor Relations', 'Your Home', 'Your Business', and 'Subscription'. A search bar and a 'TÜRKÇE' language selector are also present. A yellow 'ONLINE SERVICES' button is visible in the top right corner. The main content area is divided into two columns: 'About Enerjisa' on the left and 'Consumer Complaints' on the right. The 'About Enerjisa' column lists links for 'Company Profile', 'Our Operations', 'Our Shareholders', 'Information Security', 'Online Services', 'Career', and 'Help'. The 'Consumer Complaints' column contains a form with four input fields: 'Full Name', 'E Mail', 'Subject', and 'Message...'. At the bottom right of the form, there are social media icons for Twitter, Facebook, YouTube, Instagram, and LinkedIn. The footer of the page shows the phone number '4444372' and the website address 'enerjisa.com.tr'.

Figure 4. Grievance Form Available at the Corporate Web Site (www.enerjisa.com.tr)

Total of 13,074,884 grievances were recorded in 2018 for Başkent EDAŞ, Toroslar EDAŞ and AYEDAŞ. The number of grievances received per distribution company in 2018 per category is given in **Table 4**, **Table 5**, and

Table 6, respectively. The majority of grievances were related to outages for all distribution companies and call centre is the main channel for filing grievances. The closure rates of the grievances received by Başkent EDAŞ, AYEDAŞ and Toroslar EDAŞ are 96.9%, 98.4% and 98.2%, respectively.

Table 4. Grievances Received for Başkent EDAŞ in 2018

Records of Grievances - Category Based	2018	%
Outage	1,868,795	55%
General Information	726,955	22%
Lighting	256,094	8%
Reconnection-Disconnection	214,874	6%
Theft and Loss	79,508	2%
Other Categories	63,461	2%
Meter Operations	59,115	2%
Information Update	40,578	1%
Network Maintenance and Repair (Outage)	23,700	1%
Damage Claim	18,202	1%
Meter Reading	13,226	0.4%
Construction & Investment	9,420	0.3%
Subscription Operations	3,001	0.1%
Employee Grievance & Satisfaction	1,980	0.1%
Total	3,378,909	100%

Table 5. Grievances Received for AYEDAŞ in 2018

Records of Grievances - Category Based	2018	%
Outage	879,727	44%
General Information	447,265	22%
Reconnection-Disconnection	171,773	9%
Theft and Loss	163,968	8%
Lighting	148,867	7%
Meter Operations	72,369	4%
Other Categories	56,580	3%
Information Update	24,035	1%
Meter Reading	20,223	1%
Network Maintenance and Repair (Outage)	11,385	1%
Damage Claim	7,888	0.4%

Records of Grievances - Category Based	2018	%
Construction & Investment	3,004	0.1%
Employee Grievance & Satisfaction	2,808	0.1%
Subscription Operations	2,559	0.1%
Total	2,012,451	100%

Table 6. Grievances Received for Toroslar EDAŞ in 2018

Records of Grievances - Category Based	2018	%
Outage	5,557,881	72%
General Information	738,262	10%
Lighting	509,344	7%
Reconnection-Disconnection	257,811	3%
Theft and Loss	203,201	3%
Meter Operations	123,541	2%
Other Categories	91,274	1%
Network Maintenance and Repair (Outage)	82,136	1%
Information Update	48,893	1%
Damage Claim	32,948	0%
Meter Reading	18,054	0%
Construction & Investment	12,374	0%
Subscription Operations	4,285	0%
Employee Grievance & Satisfaction	3,520	0%
Total	7,683,524	100%

5.2 Public Disclosure

Disclosures are made through information instruments such as material disclosures, financial statements and reports, annual reports, the web page, presentations, investor meetings and teleconferences, information letters, press releases, Turkish Trade Registry Gazette etc.

Basic public disclosure methods and instruments used by the Company have been stated below provided that provisions of Capital Markets legislation and Turkish Commercial Code are reserved;

- Material disclosures transmitted through Public Disclosure Platform (the “PDP”),
- Financial statement and footnotes, independent audit report, declarations and activity report transmitted periodically to the PDP,

- Announcements and proclamations performed through Turkish Trade Registry Gazette (letter of authorized signatures, general assembly call of notice etc.)
- Press releases performed through written and visual media,
- Disclosures made to data distribution institutions such as Reuters, Forex etc.,
- Briefings and meetings held with capital markets participants either face to face or through teleconferences,
- Notifications of Corporate website (www.enerjisa.com.tr),
- Disclosures made through communication methods and instruments such as telephone, mobile phone, electronic mail, telefax etc.

5.3 Planned Improvements on the Engagement and Grievance Mechanisms

For the purposes of the Project, Enerjisa will develop and implement SEPs for the distribution companies in line with this Corporate SEP in order to ensure that all comments, suggestions and objections received from the stakeholders (in particular from the nearby surrounding communities and facilities where construction works are carried out) are dealt with appropriately and in a timely manner. It is important to note that there will also be a separate grievance mechanism for workers/employees during construction and operation phases.

To ensure that all comments, suggestions and objections received from the stakeholders are dealt with appropriately and in a timely manner, the existing grievance mechanism will be enhanced so as to inform local communities about the grievance mechanism during the consultation and disclosure activities. All grievances will be recorded, responded and resolved in a defined timeframe in line with the existing grievance mechanism in place. It is expected that comments and grievances related to the investments to be made within the scope of the Project can be sent to Enerjisa through the existing channels listed above or using the Comment/Grievance Form presented in **Appendix A**.

It is important to note that any grievances related to the activities of Enerjisa’s contractors, and their sub-contractors, will be managed in line with the mechanism described here. In addition to grievances, comments will be reviewed once a week to identify if they require a response. In case the comment requires a response, an appropriate response will be developed by Enerjisa in a month after the submission date of the comment. Comments will be reflected to a comment log that will include information on the date of the comment submission, details of the person submitting the comment, issue of comment, response required or not, and date of response.

The anticipated procedure to handle grievances during construction is illustrated in **Figure 5** below:

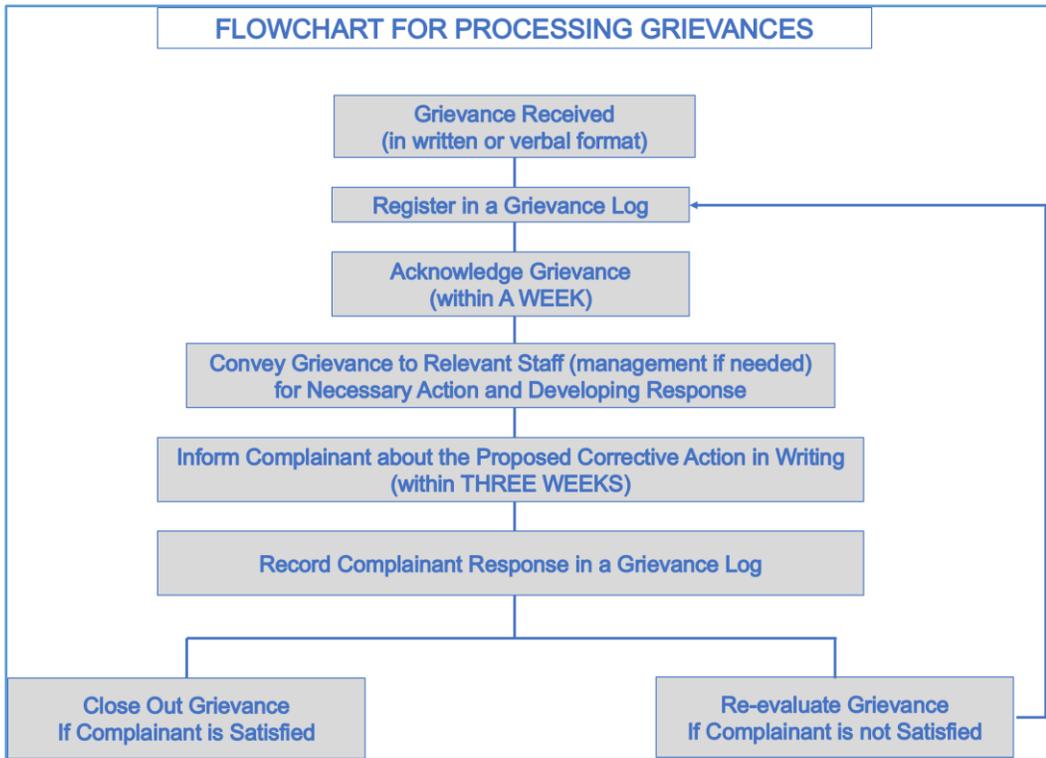


Figure 5. The Anticipated Procedure to Handle Grievances during Construction

6 RESOURCES AND RESPONSIBILITIES

The implementation of the SEP will be conducted and monitored by Enerjisa. For more information, please contact:

Address: ENERJISA ENERJİ A.Ş. Barbaros Mah. Begonya Sok. Nida Kule Ataşehir, Batı Sitesi No:1/1 Ataşehir 34746 Istanbul.

Phone: 444 4 372

7 MONITORING and REPORTING

SEP monitoring and evaluation reports including general performance/sustainability aspects of the Project will be disclosed to stakeholders periodically by Enerjisa via the corporate web site.

Appendix A: Comment/Grievance Form

COMMENT/GRIEVANCE FORM		
INFORMATION ABOUT THE PERSON SUBMITTING COMMENT AND/OR COMPLAINT (Please leave blank if you wish to remain anonymous. Your comments/complaints will still be considered by Enerjisa)		
Full Name:		
Date:		
Contact Information: (Please provide necessary information based on how you wish to be contacted)		
By mail		
By phone		
By e-mail.....		
Indicate your purpose: <input type="checkbox"/> Comment <input type="checkbox"/> Complaint Recorded by: <input type="checkbox"/> Person submitting comment/complaint <input type="checkbox"/> Other (please specify who)		Signature confirming receipt of completed Comment/Complaint Form copy
YOUR COMMENTS (Continue on the back of the sheet if required)		
INFORMATION ABOUT YOUR COMPLAINT		
Describe the Complaint (Continue on the back of the sheet if required)		
Date of Incident Regarding Complaint		
<input type="checkbox"/> One-time incident/grievance (Date) <input type="checkbox"/> Happened more than once (how many times?) <input type="checkbox"/> On-going (currently experiencing problem)		
What would you propose to resolve the problem? (Continue on the back of the sheet if required)		
This section will be filled by Enerjisa		
STATUS OF COMMENT		
Comment Logged (Y/N)	Date of submission:	Logged by:
Response Required (Y/N)	Date of response sent:	
STATUS OF COMPLAINT		
Complaint Logged (Y/N)	Date of submission:	Logged by:
Date of Response sent:	Complaint closed (Y/N):	Close out date and signature: