

# ENVIRONMENTAL AND SOCIAL PERFORMANCE ANNUAL MONITORING REPORT (AMR)

Akfen Yenilenebilir Enerji A.S. Akfen Enerji Turkey IFC Project Number: 36772

REPORTING PERIOD: (month/year) through (month/year)

AMR COMPLETION DATE: (day/month/year)

Environment, Social and Governance Department 2121 Pennsylvania Avenue, NW Washington, DC 20433 USA www.ifc.org/enviro

### **AMR SECTION I**

#### **INTRODUCTION**

IFC's Investment Agreement requires for the Akfen Yenilenebilir Enerji A.S. project require the akfen Enerji to prepare a comprehensive Annual Monitoring Report (AMR) on the environmental and social (E&S) performance of its facilities and operations. This document comprises IFC's preferred format for E&S performance reporting. The following template may be supplemented with annexes as appropriate to ensure all relevant information on project performance is reported.

#### Contents:

- Project Information
- Client's Representation Statement by Sponsor authorized representative
- Summary of Key E&S Aspects during the Reporting Period
- New Development/ Corporate Financing
- Action Plan Status and Update
- Deviations/non-compliances

#### **AMR SECTION II**

#### Client's Representation Statement by Sponsor authorized representative

I am Mustafa Kemal GÜNGÖR in my role of Assistant General Manager and representing Akfen Renewable Energy certify that

- a) The Project is in compliance with all applicable E & S Requirements as described in the investment agreement/contract/.../, and all actions required to be undertaken pursuant to the Environmental and Social Action Plan (ESAP) and any subsequent supplemental action plans. (when applies: with the exception made for those that have been disclosed in Section seven (VI) in this report ...........(Section VI is to include any such deviation/non compliance that the client must inform IFC of)
- b) Beyond what is reported in this AMR for the current reporting period, in relation to the Project, to the best of my knowledge, after due inquiry, there no:
  - Circumstances or occurrences that have given or would give rise to violations of E &S and labor Laws or E &S and labor Claims;
  - Social unrest, local population disruption or negative NGO attention due to the project
  - Material social or environmental risks or issues in relation to the Project other than those identified by the E&S Assessment and the Environmental and Social Review Summary.
  - Existing or threatened complaint, order, directive, claim, citation or notice from any Authority.
  - Any written communication from any Person, in either case, concerning the Project's failure to comply with any matter covered by the Performance Standards;
  - Ongoing or, threatened, strikes, slowdowns or work stoppages by employees of the Borrower or any contractor or subcontractor with respect to the Project;
- c) All information contained in this AMR is true, complete and accurate in all respects at the time of submission and no such document or material omitted any information the omission of which would have made such document or material misleading.
- d) There have not been any new company activities (eg. expansions, construction works, etc) that could generate adverse environmental effects? And there have been no new ESIA studies, audits, or E&S action plans conducted by or on behalf of (the ClientCompany), with respect to any Environmental or Social standards/regulation/ applicable to the Project that IFC has not been notified of

	27.02.2017
Signature	Date

#### **AMR SECTION III**

#### SUMMARY OF KEY E&S ASPECTS DURING THE REPORTING PERIOD

This section aims to identify the key E&S progress/activities/incidents during the Reporting period (include Summary of Key Findings for the Reporting Period e.g. non-compliances, significant incidents<sup>1</sup>, social unrest, significant improvements/initiatives regarding E&S performance. Etc)

,	, 8	•		8 8	•	,
the project over	r the reporting in installed, ha	project and provi- period. For examp production capa s as needed/	ole, has constru	ction been start	ed or completed	d, has new
Design	Construction	Expansion	Operation	n 🗌 Closure	e Other (s	specify)
New investmen Please provide		oment?  Yes	☐ No report.			
PS1: Asses Impacts	sment and	Management	of Enviro	ımental and	d Social Ri	sks and
•		atus of the following below. Please co				on schemes
	Not being	Future	Planning C	Currently	Successfully	Date of

	Not being considered	Future consideration	Planning to implement	Currently implementing	Successfully implemented	Date of certification/re-certification
ISO 9001 - Quality						
ISO 14001 - Environment						
OHSAS 18001 - OHS						
Other						

Describe any changes in the organizational structure to manage environment, health and safety, labor and social aspects during the reporting period. Describe number of personnel in charge of E&S issues.

5

<sup>&</sup>lt;sup>1</sup> Examples of significant incidents follow. Chemical and/or hydrocarbon materials spills; fire, explosion or unplanned releases, including during transportation; ecological damage/destruction; local population impact, complaint or protest; failure of emissions or effluent treatment; legal/administrative notice of violation; penalties, fines, or increase in pollution charges; negative media attention; chance cultural finds; labor unrest or disputes; local community concerns.

		al, social and health g and number of par	•	ing provided to sta	ff. Provide annex	
During the reporting period, are you aware of any events that may have caused damage; brought about njuries or fatalities or other health problems; attracted the attention of outside parties; affected project abor or adjacent populations; affected cultural property; or created liabilities for your company?  Yes No						
Provide details						
		nsultation and disclo nunities or public rel				
		mplemented during t er savings, sustainab				
	How many have b	ype of comments and here resolved and here				
Have ESIAs an	d or E&S Due Dili	gence conducted du	ring the reportin	g period? (Please p	provide copies)	
Using the Table provided below list any internal and/or external grievance or dispute (include court action) received during the reporting period, describe how it was addressed and its current status.						
		ng period, describe				
action) received  Grievance/	l during the reporti	ng period, describe	how it was addre	essed and its currer	nt status.	
action) received  Grievance/	l during the reporti	ng period, describe	how it was addre	essed and its currer	nt status.	
Grievance/ Dispute date  PS2. Labor  Have you chan reporting period	Complainant  and Working ged your Human	Issue  Conditions  Resources (HR) pol	Resolved (Y/N)	Action taken	Date closed	
Grievance/ Dispute date  PS2. Labor  Have you chan reporting period  Yes	Complainant  Complainant  and Working  ged your Human  ?  No Provide do	Issue  Conditions  Resources (HR) poletails	Resolved (Y/N)	Action taken  s or working cond	Date closed  ditions during the	
Grievance/ Dispute date  PS2. Labor  Have you chan reporting period  Yes	Complainant  Complainant  and Working  ged your Human  ?  No Provide do	Issue  Conditions  Resources (HR) pol	Resolved (Y/N)	Action taken  s or working cond	Date closed  ditions during the	
Grievance/ Dispute date  PS2. Labor  Have you chan reporting period  Yes	Complainant  Complainant  and Working  ged your Human  ?  No Provide do	Issue  Conditions  Resources (HR) poletails	Resolved (Y/N)	Action taken  s or working cond	Date closed  ditions during the	

Site 2

<sup>&</sup>lt;sup>2</sup> Contractors performing core functions for the Company in the premises of the Company or in the name of the Company

## Occupational Health and Safety

Describe the main changes implemented in terms of Occupational Health and Safety (OHS) during the reporting period, e.g. identification of hazards, substitution of chemicals, new controls, etc.

Provide the workplace monitoring data, including thermal conform (temperature, humidity), noise, illumination during this reporting period.

Occupational Health and Safety Indicators . Please provide separate tables as needed for each site and at corporate level.

Report Total numbers for each parameter	This reporting	g period	Reporting period- Previous year		
cach parameter	Direct employees	Contractor employees	Direct employees	Contractor employees	
Total number of Workers					
Total man-hours worked - Annual					
Total number of lost time occupational injuries					
Total number of lost workdays due to injuries					
Number of fatalities					

Provide details for the non-fatal injuries during this reporting period

Company or contractor employee?	Total workdays lost	Description of injury <sup>3</sup>	Cause of accident	Corrective measures to prevent reoccurrence

Describe in detail fatalities and vehicle accidents, including corrective measures (provide copies of OHS investigation and respective corrective plan).

#### Significant Incidents

<sup>&</sup>lt;sup>3</sup> Injury: Incapacity to work for at least one full workday beyond the day on which the accident or illness occurred. Lost workdays are the number of workdays (consecutive or not) beyond the date of injury or onset of illness that the employee was away from work or limited to restricted work activity because of an occupational injury or illness.

Date of Incident	Type of Incident	Brief Description of Incident	Fatalities? (Y/N)	Fatalities	Preventive measures taken after the incident

## PS3. Resource Efficiency and Pollution Prevention

Provide the following environmental monitoring data for this reporting period. If you already have all the data requested available in another format, this can be submitted instead. Please provide a scaled facility map showing the precise locations of all monitoring points.

Ambient noise:

Ambient air quality:

Liquid effluent discharges:

#### Resources and Energy Consumption:

If any of the EHS guidelines or local regulatory limits are exceeded please explain the cause and, if appropriate, describe the planned corrective actions to prevent re-occurrence.

#### Energy and Water management (please add cloumns as needed):

Utility Units		Annual Cor	Annual Consumption			Total	
Type		Site 1	Site 2	Site 3			
Electricity productio	MWh						
n							
Electricity	MWh						
consumpti							
on							
Natural	$m^3$						
Gas							
Diesel	L						
Other fuel	L						
(specify)							
Water	$m^3$						

Greenhouse Gases: Please complete the following table for each site and at corporate level

Indicator (Site)	Annual Quantity	Units	Target Reduction (%)	Actions To Be Taken
Direct CO <sub>2</sub> emission				

intensity		
Indirect CO <sub>2</sub>		
emission intensity		
Total production		
Total CO <sub>2</sub> emission		

Waste and Hazardous Materials (please complete the tables below. Add rows/columns as needed)

Waste Type (add rows as needed)	Annual Quantity (Site 1)	Annual Quantity (Site 2)	Annual Quantity (Site 3)	Annual Quantity (Site 4)	Storage, Handling and/or Treatment Method
Domestic					
Waste					
Plastics					
Paper					
Metal Scraps					
Wooden					
Scraps					
Waste					
oils/lubricants					
Medical waste					
Electronic					
wastes					

Hazardous Material (Name and Number UN/CAS)	Site	Class or division	Annual Quantity	Maximum Quantity Stored on Site
-		-	-	=
-		-	-	-
-		-	-	-
-		-	-	-

## PS4 - Community Health, Safety and Security

Using the table below list and briefly describe any new initiatives implemented in relation to community health and safety during the reporting period. Include risk assessments, new infrastructure and equipment; hazardous materials and safety management, transportation and exposure to disease.

Expected or actual date of Implementation	Planned future
	mitigation efforts?

During the reporting period any emergency drills have been conducted with community participation? Are the communities aware of the emergency response plans?

Please describe any changes in the Company's engagement with private/public security forces during the reporting period and any corresponding agreements.

## PS5 - Land Acquisition and Involuntary Resettlement

Provide the following information regarding land acquisition required for the project that has taken place during the reporting period. if none, write N/A and skip this section.

	# Plots	Hectares	Status of Acquisition % total area
Total area acquired during the reporting period			
Total area of agricultural lands affected			

## Displacement Indicators

	Total land (Ha)	Total Families/ Business	Total Individuals	Resettled/ Restored To-Date	Pending	Comments
1. Physically displaced						
Legal title holders						
Without title Squatters						
Renters						
Total						
<b>2.</b> Economically displaced						
3. Physically and Economically Displaced (Both)			_			
TOTAL						

Briefly describe any measures to avoid impacts on livelihoods and residences during the reporting period.

Briefly describe the type of solutions provided for new physically displacement and economic displacement not included in the RAP).

Briefly describe any special measures for particularly vulnerable cases (elderly, female-headed household, etc) (new displacement)

Please attach detailed information/report of the resettlement process as per the Resettlement Action Plan monitoring arrangement.

Has	Clie	ntCompany	made any	new ir	ivestment	or	acquisitions	that	have	resettlement	issues	as	defined	by
PS5	?	Yes	☐ No				-							

If yes please provide copy/ updated information of the Resettlement Action Plan, Framework or other resettlement management plans or reports.

Using the Table provided below list any grievance or dispute (include court action) regarding land acquisition or resettlement received during the reporting period, describe how it was addressed and its current status.

Grievance/ Dispute date	Complainant	Issue	Resolved (Y/N)	Action taken	Date closed

# PS6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources

Using the table below describe any **new activities or expansions** that have increased the project footprint into new **areas of habitat** during the reporting period.

New activity/expansion	Total area covered	Habitat type

Using the table below provide details of **deforestation** conducted during the reporting period.

Site	Total area deforested	Type of species lost	Total area reforested	Type of species planted	Reforestation for commercial use Y/N

Using the table below provide details of **fish and other aquatic species harvesting** during the reporting period.

Site	Volume harvested	Type of species

## **PS8 – Cultural Heritage**

Using the table below list new cultural property discovered in the course of project activities during the reporting period.

Location	Date of discovery	Type of discovery	Additional protection measures taken

#### **AMR SECTION IV**

#### New Development

#### **Social and Environmental Screening**

Please list projects which have come under active consideration for development by since the last report. For the first report please list the opening project pipeline.

Project & Location	Brief Description

Add rows if necessary to list all projects.

#### **Projects Completed or in Progress during the Reporting Period**

Please complete the table to list the projects completed during the reporting period, which are operated by Akfen Enerji or which are under construction, and how environmental and social risk was managed in these projects. If risk management cannot be adequately covered in the sections which follow, please add any relevant information if required.

Project	Status (e.g. under construction, complete)	Major risk management measures adopted.

## **Pre-development Project Screening**

Please complete the table to show how Akfen Enerji has screened potential projects identify potential adverse environmental and/or social impacts, covered by IFC's Performance Standards which may arise from these projects. If issues were identified, please describe briefly how Akfen Enerji expects that these issues will be managed in compliance with IFC Performance Standards and local law. For each project please also state whether a formal Environmental and Social Impact Assessment was prepared.

Project	Check if the PS is applicable					Management	Formal		
	PS 2	PS 3	PS 4	PS5	PS6	PS7	PS8	Measures Summary	ESIA prepared?

## **AMR SECTION V**

## Action Plan Status and Update

Please update us in the current status of the action plan, define the dates when pending actions will be implemented. Please refer to the initial ESAP for the indicators and deliverables.

IFC No	EBRD No.	Action	Timetable Action to be Completed	Due date to be disclosed on IFC	Target and Evaluation Criteria For	Comment	Progress Update
2	1.1	Develop and implement an	- 2018	project webpage 12/31/2018	Successful Implementation Develop an		
2	1.1	environmental, health and safety management system at the corporate and site level. Ensure appropriate reporting lines to be implemented through Akfen Holding and through Akfen Energy. Attain certification to ISO 14001, OHSAS 18001and ISO 50001.	- 2018	12/31/2018	implementation plan in 2015 Corporate certification by 2018 New sites will be - in the corparete systemwithin 3 years of commissioning		
4	1.2	As part of EHS management system, nominate and maintain an EHS manager at corporate level.  The person should be a main point of contact for every stakeholder, NGOs, local communities and grievances from third parties, as well as review all new EIA's for new projects and maintain an internal audit system	December 2016	12/31/2016	HSSE Organisation chart Summarize in annual report		
5	1.3	Create an "environmental council" consisting of environmental, H&S and social specialists from the plants to improve information exchange and strategic planning.  As part of the EHS team and 'environmental council' Develop a procedure for an inspection and maintenance programme with regards to dam safety against ICOLD standards. Implement the inspection programme once the procedure is developed.  As part of EHS management plan	2015 - ongoing	12/31/2016	Summarize in annual report		
		prepare and emergency response plan, (and implement when necessary) inclusive of an early warning procedures in case of flood threatening the public (typically for floods with a return period of five years or more).					
	1.4	Develop and implement a Corporate and Social Responsibility (CSR) Policy for the Company. Create synergies with Akfen Group Foundation social investment activities.	2017 First report for 2017 in 2018	12/31/2017	In annual report provide status of implementation Copy of the CSR report	This action will be on the agreement but will not be	

IFC No	EBRD No.	Action	Timetable Action to be Completed	Due date to be disclosed on IFC project webpage	Target and Evaluation Criteria For Successful Implementation	Comment	Progress Update
		This programme should contain high quality information on objectives, methodologies, target dates and Key Performance Indicators (KPI) same as corporate requirements. Develop a programme for community engagement for each plant. Prioritise the most vulnerable and affected communities in CSR projects.				disclosed on IFC project data base	
		Publish CSR report, as part of disclosure of non financial information every year					
	1.5	Review and check the labour conditions of long term (>1 year) subcontractor companies proving services to the power plants.	2015/16 ongoing		Summary in annual report to EBRD and IFC	This action will be on the agreement but will not be disclosed on IFC project data base	
	1.6	Development of an Energy Saving Programme and conduct energy efficiency audits at each power plant. This should be undertaking as part of ISO 50001 implementation.	2018		Energy efficiency audits conducted	This action will be on the agreement but will not be disclosed on IFC project data base	
	1.7	Improve health and safety, with appropriate training and PPE equipment. Aim to attain LTIR to 1 by 2016 and Total recordable incidents (TRiR) to less than 5. This applies to company direct acitivities only.	2015-17		Procedure developed	This action will be on the agreement but will not be disclosed on IFC project data base	
3	1.9	Develop a procedure of independent impact assessment (EIA) on environment, biodiversity and local communities as well as cultural heritage for all new investments.  This will include appropriate biodiversity assessments for birds and bats - and aquatic surveys (fish etc).  Design mitigation measure for each Project.  Any new project that would fall under the EU EIA Directive will include a screening assessment which will be conducted by Akfen and its advisors(unless a project falls into a category no approval is required) to define the scope of the due diligence.	2016(prssecure will be develop with in the first 6 months of 2016) onwards	12/31/2016	Summary of work undertaken in annual report and copy of NTS or link to web site with NTS in annual report. Any A category Project or located in a sensitives areas (IBA, Protected areas, Key Biodiversity Areas etc) to be subject to a non objection from	The document will prepare in Turkish a summary in English will be provided in the annual report under the decision making process	

IFC No	EBRD No.	Action	Timetable Action to be Completed	Due date to be disclosed on IFC project webpage	Target and Evaluation Criteria For Successful Implementation	Comment	Progress Update
		all projects will follow National legislation, - The final EIA may consist of a local EIA plus supplementary information as defined by the screening assessment on environmental and social issues.  For all projects where an EIA is required - publish a Non Technical Summary (NTS) at the time of the zoning plan Stakeholder Engagement Plan (SEP) on internet and disclose as appropriate EBRD and IFC top approve any A category Project		, sopuge	EBRD and IFC prior to application for construction permit.		
	1.10	For any wind farm located in a bird sensitive area as defined in screening assessment by an ornithological or their advisers will undertake an appropriate ird ad bat monitoring to assess environmental impacts.  Any wind farm as defined in the screening assessment will need to include a cumulative assessment of all existing and planed wind farm projects in the near by area -  No wind farm or hydro plant will be located on a Cultural Heritage site, or in a locally, nationally or internationally recognized protected area.  - as part of the screening assesment Akfen will review KBA (Key Biodiversity Areas) for key projects. The online version of Key Biodiversity Areas (Önemli Doğa Alanları) inventory in Turkish is available on: http://dogadernegi.org/yayinlarimiz.aspx and http://milliparklar.gov.tr  Based on the screening assessment Any wind farm located near a sensitive bird habitat or bird migratory route requires prior approval- and the definition of the scope of due diligence by EBRD and IFC.	2015 ongoing		Annual report to Bank	This action will be on the agreement but will not be disclosed on IFC project data base	
	1.11	The Company will not develop any new project that is located within an existing or potentially protected areas based on the screening areas   If a site is located in a potentially sensitive areas, as defined in the screening assessment such as National Parks, the scope of the EIA will be agreed with the EBRD and IFC	Ongoing		Appropriate assessment of sites and, avoidance of sensitive locations.	Catak HEPP project to be undertaken only if not located in A - protection area, -if the court decides	

IFC No	EBRD No.	Action	Timetable Action to be Completed	Due date to be disclosed on IFC project webpage	Target and Evaluation Criteria For Successful Implementation	Comment	Progress Update
				- Vogage		that the project is go ahead, the company will provide to EBRD and IFC an English version of the ecological report for this project for non-objection from EBRD and IFC to proceed  This action will be on the agreement but will not be disclosed on IFC project data base	
10	2.1	Develop formalised human resources management system and procedures with special regard to grievance procedures. This should include welfare arrangements for construction workers prior to construction activities commencing.	End of 2017	12/31/2017	Management system manual and policies to be submitted to EBRD and IFC		
9	2.2	Develop and adopt Human Resource Policy and management system covering all employees, on a best effort basis for contractors as well as sub- contractors, to include (but not be limited to)  Approach to managing its workforce Management of worker relationships Access to worker's organisations Working conditions and terms of employment Child labour and forced labour policies Equal opportunities and non-	End of 2017	12/31/2017	Written HR policies compliant with EBRD PR2 / IFC PS2 and the national Labour Law HR policy developed and adopted: prior to further construction activities. Contractor policies/ procedures reviewed/ approved: prior		

IFC No	EBRD No.	Action	Timetable Action to be Completed	Due date to be disclosed on IFC project webpage	Target and Evaluation Criteria For Successful Implementation	Comment	Progress Update
		discrimination  Oversight provided of contractor policies/procedures			to work on-site. HR Policies implemented throughout construction and operation.		
	2.3	Set up and maintain a formal grievance mechanism for employees and contractors and disseminate information about its uses to the workforce	Prior to construction In Annual report Summarize material issues to EBRD		Adoption of formal grievance mechanism detailed in the SEP	This action will be on the agreement but will not be disclosed on IFC project data base	
	2.4	Arrangements should be in place for construction workers so that they should have access to welfare facilities such as drinking water, toilets and dining facilities At the time of the construction of laydown area and more semi-permanent facilities.	At the time of the construction activities commencing		Report should be submitted to EBRD/IFC-detailing arrangements to be put in place for construction workers At the time of the commencement of construction.	This action will be on the agreement but will not be disclosed on IFC project data base	
	2.5	Conduct regular employee standards audits to the best effort for contractor and sub-contractor employees to ensure compliance with the Labor Law and ILO Principles which Turkey is a party.	During construction and operation		Employee Standards Review Reports Summary of these reviews/audits should be provided in the Annual Report to EBRD and IFC	This action will be on the agreement but will not be disclosed on IFC project data base	
	3.1	Ensure that the measures identified in the EHSS due diligence report with regards to prevention and minimisation of pollution risk is addressed. Undertake an internal audit at end of 2018 to assess compliance with the ESAP and findings of the ESDD. As part of EHS management systems develop an additional action plant	2018		End of 2018 Report on the issues identified and remedial actions taken or planned.	This action will be on the agreement but will not be disclosed on IFC project data base	
15	3.2	Undertake an environmental monitoring assessment at each current and future HEPP location, to verify the biological effectiveness of the ecoflows. This should consider factors such as:  are ecoflows able to maintain water quality (temperature, dissolved oxygen, etc.);  can ecoflows support the maintenance of fish populations, particularly the more vulnerable species; and	2018 or following commissioning of a new HEPP.	12/31/2018	Report on the findings of the assessment to EBRD/IFC by end of 2018 to be discussed by the KEY shareholders internal		

IFC No	EBRD No.	Action	Timetable Action to be Completed	Due date to be disclosed on IFC project webpage	Target and Evaluation Criteria For Successful Implementation	Comment	Progress Update
		do ecoflows give the streams the capacity to support spawning, incubation, rearing, and passage of fish?  Confirm that the presence and sizing of fish protection grids on the water intakes are appropriate.					
	3.3	Provide an annual report to EBRD and IFC - with an inventory of greenhouse gas savings from the portfolio.	End 2016 and then each year after for the GHG inventory.		Report on the procedures and systems to be implemented to EBRD and IFC	This action will be on the agreement but will not be disclosed on IFC project data base	
11	4.1	Akfen to review and align the H&S Plans in line with the EBRD PR4 / IFC PS2 and PS4 requirements. Plans should guide all Project-related activities during construction and operation. Requirements to include (but not be limited to):  Job- and task-specific hazard and risk analysis and controls for activities.  Provision of PPE, requirements for use of PPE, and enforcement of PPE use.  Safety training for all personnel, covering hazards for their jobs.(i.e. Undertake driver safety training and code of conduct training for the drivers of the transfer trucks as well as drivers of employee service buses.)  Develop an accident investigation program. Record incident statistics, including total work hours, serious injuries, lost time, etc.  Develop a medical monitoring program for employees.  Ensure implementation of a work permit system covering both workforce and contractors for dangerous tasks such as confined space.  Establish and implement a "Lock Out Tag Out" system.  Implement workplace hazard monitoring.  Place safety signage where necessary. Safety signage should address fire safety, emergency response, noise, PPE, no smoking, traffic	2016- throughout the lifetime of the projects	12/31/2016	Health and safety management plan Copies of updated procedures Records of internal and external audits		

IFC No	EBRD No.	Action	Timetable Action to be Completed	Due date to be disclosed on IFC project webpage	Target and Evaluation Criteria For Successful Implementation	Comment	Progress Update
12	4.2	control, etc.  Review and update the current emergency response plans in consultation with responsible authorities and communities to cover at least fire, flood response, spills, severe injuries or fatalities, or other events that could reasonably be expected to occur within the lifetime of the projects in line with the EBRD and IFC requirements.  Trainings and drilling exercises should be conducted on regular basis.	2016-ongoing	12/31/2016	Updated Emergency Response Plan		
	4.3	Regularly Monitor the firefighting system/equipment as necessary, including fire extinguishers in offices and operation areas. Provide relevant training to personnel and prepare/post relevant instructions.	2016		Availability of firefighting equipment and fire water	This action will be on the agreement but will not be disclosed on IFC project data base	
14	5.1	Adopt a formal grievance mechanism, enact the Stakeholder Engagement Plan and develop a land acquisition and compensation framework.	2017	12/31/2017	Document stakeholder engagement activities to include land acquisition Annual report on stakeholder engagement  Provide report to EBRD and IFC with regards to land acquisition framework		
	5.2	Implement the SEP (See Action 10.1 to develop an SEP) and a formal grievance mechanism, and continued consultation with people affected by land acquisition	Prior to land acquisition as required		Document stakeholder engagement activities to include land acquisition Annual report on stakeholder engagement	This action will be on the agreement but will not be disclosed on IFC project data base	
	5.3	Provide an update on the progress to close out all land acquisition claims with regards to Doruk	June 2016		Provide report to EBRD and IFC quarterly on progress	This action will be on the agreement but will not be disclosed on IFC project data base	
13	5.4	Develop a land acquisition and compensation framework for the	End 2016	12/31/2016	Provide report to EBRD and IFC		

IFC No	EBRD No.	Action	Timetable Action to be Completed	Due date to be disclosed on IFC project webpage	Target and Evaluation Criteria For Successful Implementation	Comment	Progress Update
		purchase of land for new projects the framework where possible and to the extend when possible will include associated infrastructure such as powerlines. For each project undertake risk assessment associated infrastructure even if not develop by Akfen.  The objectives of the framework should describe how to:  avoid or minimise resettlement, economic displacement  consider feasible alternative project designs  mitigate adverse social and economic impacts from land acquisition  provide compensation for loss of assets at replacement cost  improve or, at a minimum, restore the livelihood and standards of living			with regards to land acquisition framework		
	6.1	Undertake pre-construction ecological surveys and develop site mitigation / protection plans, for OHL project in the locations where the EIA has identified that protected species are present.	Prior to construction commencement.		Provide report to EBRD and IFC with regards the material findings of the surveys and measures implemented which will be used internally	This action will be on the agreement but will not be disclosed on IFC project data base	
	6.2	Based on the screening study Undertake location specific terrestrial ecological and birds and bats surveys for all new windfarm locations, to assess resident species risk, migratory and general bird related risks, and ensure adequate mitigation is featured as part of the project designs.	As part of planning for all future windfarms, completed prior to detailed design finalisation.		Provide report to EBRD and IFC - with regards the findings of the surveys and measures implemented.	This action will be on the agreement but will not be disclosed on IFC project data base	
	6.4	Maintain a post construction monitoring system for hydro and wind farms to asses post construction impacts and as necessary develop mitigation measure to limit such impacts. These can be through active turbine management or flow management.	Ongoing		Compliance with permits and best practice to limit net ecological impact.  Information in annual report. To be verified every 5 years by independent audit.	Action plans could result in reduction of operations.  This action will be on the agreement but will not be disclosed on IFC project	

IFC No	EBRD No.	Action	Timetable Action to be Completed	Due date to be disclosed on IFC project webpage	Target and Evaluation Criteria For Successful Implementation	Comment	Progress Update
	6.5	Maintain a minimal water flow on all hydro project for all to ensure that not net biodiversity loss and no negative impact on downstream water users.	Ongoing		Compliance with permits and best practice to limit net ecological impact.  Information in annual report. To be verified every 5 years by independent audit.	data base This action will be on the agreement but will not be disclosed on IFC project data base	
1	7.1	The EIA process for each new project to consider the range of cultural heritage considerations  Develop and implement a 'chance find' procedure to be used during all construction activity, to aid in managing archaeological finds.	End of 2016 training to be implemented as part of EHS management system development	12/31/2016	Completed EIA accepted and assessed by national regulator.		
6	10.1	Develop and implement a corporate Communication Plan and implement such plans at the companies' level. Develop separate Stakeholder Engagement Plans (SEP) for each project (at least for each major investment). This should include the development and implementation of a Grievance Mechanism. The SEP should be reviewed and if necessary updated annual or when changes occur in the Projects.	2016- ongoing throughout the lifetime of the projects	12/31/2016	SEP published on website and disclosed to affected stakeholders. Summary of the implementation in Annual reports to EBRD and IFC		
		The SEP (s) should address potential issues that may be raised by NGOs in Turkey. If necessary, or request arrange for meetings as appropriate.  As part of SEP and EHS management prepare a register of risks for the public and develop and implement and monitor mitigation measures.  The register should be prepared by a specialist used with the implementation of international Industry good practices on hydropower schemes.					
7	10.2	Monitor implementation of the SEP and grievance mechanism to ensure a continuous and systematic stakeholder engagement programme throughout the projects life cycle. Documentation of all stakeholder activities and logging of grievances to inform the annual monitoring report. The SEP should be reviewed and if necessary updated annual or when material changes occur in the Project.	2016- ongoing throughout the lifetime of the projects	12/31/2016	Document stakeholder engagement activities Document grievances, response to grievances with records maintained. Provide summary in Annual report on stakeholder		

IFC No	EBRD No.	Action	Timetable Action to be Completed	Due date to be disclosed on IFC project webpage	Target and Evaluation Criteria For Successful Implementation engagement activities and	Comment	Progress Update
8	10.3	Develop a Corporate internet site, with	2016	12/31/2016	grievances Link to web site		
		inclusive of a sustainability page and disclose as appropriate NTS and community information brochures for new Projects on this web site			in annual report		
	10.4	Develop a Non-Technical Summary (NTS) as appropriate and community leaflet for each new project in construction or to be developed in the future providing a project description, the ESIA process, the environmental and social benefits/impacts, mitigation and management measures and the contact details for communications with a link to the SEP	As part of the development, planning, design, construction and commissioning of each project		Disclosure of SEP and NTS	This action will be on the agreement but will not be disclosed on IFC project data base	
	10.5	Appoint a Community Liaison Officer (CLO) with appropriate skills and experience to effectively manage the implementation of the SEP at each site	Prior to construction		Appointment of CLO Organisation chart	This action will be on the agreement but will not be disclosed on IFC project data base	

### **AMR SECTION VI**

## Deviation/non-Compliances

The following are the identified deviation/non-compliances identified in reference to the following:

(I) IFC's Performance Standards; (ii) Environmental and Social Action Plan; (iii) Non-compliance with local environmental and Social regulations iv) Applicable EHS Guidelines

If there is any Non-compliances/deviations please record and provide additional information if necessary.

Areas of Interests	Non- Compliances Identified	Corrective Action Plan	Status of Completion	Completion Date
IFC's Performance Standards (PS1-8)		1100001110011	Comprone	
Environmental and Social Action Plan				
Local environmental and Social regulations				
Applicable EHS Guidelines				

Please explain the cause and, if appropriate, describe the planned corrective actions to prevent reoccurrence.