

Environmental and Social Action Plan (ESAP) for Akfen Solar Portfolio

| No. | Action | Environmental & Social Risks (Liability/Benefits) | Requirement (Legislative, EBRD PR, Best Practice) | Resources, Investment Needs, Responsibility | Timetable | Target and Evaluation Criteria for Successful Implementation | Status |
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| Management of Environmental, Social and Governance (ESG) issues | | | | | | | |
| 1.1 | Implement Corporate ESAP fully in existing and new sites Provide an annual summary of implementation And ongoing information of any complaints or non-compliance events | Compliance with local legislation Need to ensure resources are provided for implementation | Lenders ESAP agreed as part of financing into Akfen Renewables in 2015 | Akfen Renewable, with support from external consultants | ongoing | Summarize in annual report | |
| 1.2 | Increase internal E&S capacity with additional E&S staff with adequate qualifications, skills and experience. Appoint an EHS manager and also a community liaison officer to manage CSR issues at all renewable project sites. | Increased monitoring of the project sites and contractors Ensure appropriate staff available to manage issues | Lenders | Akfen Renewable | 2018 | Updated HSSE Organisation chart Liaison officer to visit on regular basis local regulators and communities to ensure implementation of SEP and CSR | |
| 1.3 | Develop and Implement an Environmental, Health and Safety (EHS) management system for each Project sites. As part of Corporate Social Responsibility (CSR) program develop a CSR and community interaction action for each Project site. Fund should be | The CSR program will aim to assist the local community to ensure there is a 'buy-in' into the project and there are some local benefits from the project. | Lenders requirement, best practice. | A minimum lump-sum contribution of USD 100 k distributed among all sites, during construction per site, and | Report to Lender and information published in local paper and on web site on the CSR program, what funds are | 2018 – onwards. Commitment provided prior to financial close with CSR program in place In annual report provide information on | The CSR program will be stand alone for the Project. The CSR program will link with the SEP to ensure a consistent |

Akfen Solar Power Plant Project Portfolio: ESAP

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| | <p>provided for each site. An initial budget of 100 K USD for 2018, and then around 50 k USD per annum with a flexibility to distribute according to the needs of the local communities around the projects. Each site needs to received some funding every 2-3 years.</p> <p>The CSR will include the development of local action plan and interaction with the local community and support for local development projects. A summary of the CSR program will be made available locally in local press and web site.</p> | | | <p>then an annual contribution of circa USD 50 K to be distributed on as needed basis, with a principal that every site receiving funding every 2 years.</p> | <p>used for and how they benefit the local community</p> | <p>CSR and sum spend per site and total and priority programs</p> | <p>approach and engagement with local community.</p> |
| 1.4 | <p>Implement Corporate Social Responsibility (CSR) plan and Stakeholder Engagement Plan (SEP). Update on annual basis. Provide information on CSR implementation in annual report.</p> | <p>Positive communication with the surrounding communities and hence possible protection of the assets</p> | <p>Best practice</p> | <p>Akfen Renewable</p> | <p>ongoing</p> | <p>Report in Annual Report</p> | |
| 1.5 | <p>Publish NTS for each project on Akfen web site and maintain information on each project on internet and in local community.</p> <p>Every 3 years undertake a review (internal audit) of implementation and need to update NTS</p> | <p>Update information as needed.</p> | <p>EBRD / Lenders existing ESAP</p> | | <p>ongoing</p> | <p>NTS published</p> | |
| <p>Additional Site specific issues: Biodiversity and Living Natural Resources</p> | | | | | | | |
| 2.1 | <p>Konya, Malatya and Van SPP sites need additional investigations or more detailed survey results to fully ascertain biodiversity baseline and possible</p> | <p>Although non of the sites are in critical habitat areas, baseline studies</p> | <p>EBRD PR6 / IFC PS6 - Lenders Best Practice</p> | <p>Akfen Renewable with support from</p> | <p>Before construction starts</p> | <p>Annual report to provide information on results of studies and compensation</p> | |

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| | <p>impacts. A budget of 10 k USD to be provided for this.</p> <p>Based on the studies develop a mitigation and compensation measure to offset unavoidable impacts and to reduce the risks of impacts to those resources.</p> <p>The compensation can take the form of financial contributions to conservation programmes focused on those KBAs and specifically the critical habitats and species that are impacted. A budget of 20 K USD should be provided to such measures, and can be linked to CSR program</p> | <p>need to be updated to assess biodiversity and limit damage to and loss of habitat and ecosystem.</p> | <p>ESDD identified some issues needing further review and if need be compensation measures</p> | <p>ecosystem experts</p> | | <p>measures undertaken at Konya, Malatya and Van SPP.</p> <p>Annual report to provide what mitigation measure taken and how much was spent.</p> | |
| 2.2 | <p>Based on the studies above, develop Ecological Management Plans to be produced for the three sites near KBA's (ME-SE, Iota, Van) and 36 km ETL and be integrated into project development and implementation plans, including the EPC and O&M contracts.</p> | <p>Avoid risk of damage to and loss of habitat and ecosystem, possible impacts on endangered species</p> | <p>EBRD PR6/IFC PR6 Lenders Best practice</p> | <p>Akfen Renewable</p> | <p>Before construction starts</p> | <p>An Ecological Management Plan for each site to be produced and integrated into project development and implementation plans, including EPC and O&M contracts</p> | |
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