

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
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

	<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>	

Akfen Solar Power Plant Project Portfolio: ESAP

	<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>	