



Stakeholder Engagement Plan

2022

1 TABLE OF CONTENTS

1	INTRODUCTION.....	3
1.1	Overview	3
1.2	Purpose of Stakeholder Engagement Plan.....	3
1.3	Structure of Stakeholder Engagement Plan.....	3
2	ABOUT UEDAŞ.....	4
2.1	Structure of UEDAŞ.....	5
2.2	Distribution Network.....	7
2.3	SCADA System	8
2.4	Operating Performance.....	9
2.5	Potential Environmental and Social Impacts of UEDAŞ	11
3	NATIONAL LEGISLATION AND INTERNATIONAL REQUIREMENTS	1
4	UNDERSTANDING THE NEEDS AND EXPECTATIONS OF RELATED PARTIES.....	2
4.1	Customers (including vulnerable groups).....	2
4.2	Neighbouring Communities and Facilities (including vulnerable groups).....	3
4.3	Landowners/Users (including vulnerable groups).....	3
4.4	Employees.....	3
4.5	Contractors/Suppliers	3
4.6	Official Institutions.....	4
4.7	Non-Governmental Organizations (NGOs).....	8
5	STAKEHOLDER ENGAGEMENT ACTIVITIES	9
5.1	Customer Relations.....	9
5.2	Corporate Relations.....	11
6	STAKEHOLDER ENGAGEMENT APPROACH AND FUTURE STAKEHOLDER ENGAGEMENT PROGRAM ..	12
7	GRIEVANCE MECHANISM.....	16
7.1	Grievance Management for Employees and Contractors/Suppliers	16
7.1.1	Employees	16
7.1.2	Contractors/Suppliers	17
7.2	Grievance Management of Land Owners/Users and Other Stakeholders.....	17
7.2.1	Receipt and Recording o the Grievances.....	18
7.2.2	Resolution of the Grievances.....	19
7.2.3	Response to Grievances.....	19
7.3	Grievances about Gender Based Violence and Harassment	19
7.4	Reporting of Grievances.....	19
8	RESOURCE AND ORGANISATIONAL ARRANGEMENTS	20
9	REPORTING OF SEP.....	21
10	COMPANY CONTACT INFORMATION.....	22
11	APPENDIX.....	22

11.1	Abbreviations.....	22
11.2	General Application Form.....	24
11.3	Online Transaction Center.....	25

1 INTRODUCTION

1.1 Overview

The Stakeholder Engagement Plan is an active document prepared by UEDAŞ with the purpose of presenting plans for stakeholder engagement, communication and information sharing with stakeholders, in line with the company's environmental and social policies, international standards, and credit institution requirements.

1.2 Purpose of Stakeholder Engagement Plan

The main purpose of the Stakeholder Engagement Plan is to provide people impacted by UEDAŞ and other stakeholders with valid, timely and accessible information. Stakeholders will be able to have the opportunity to express their thoughts and concerns on the impacts and mitigation measures of UEDAŞ by this way. The stakeholder engagement process helps in the case of the following issues:

- Identification of the stakeholders that may be impacted by UEDAŞ and inclusion of them in the processes,
- Ensuring that UEDAŞ is well understood by the stakeholders impacted by its regional activities and new line installations,
- Identification of issues that may pose a risk or its stakeholders in the early stages of the activities of UEDAŞ, impacts related to such activities, and impact management process,
- Ensuring the appropriateness of mitigation measures (and ensuring that they are applicable, effective, and efficient),
- Establishment of a system, long-term information sharing, between UEDAŞ and citizens living in the service area that will benefit all parties.

The main objectives of this document are as follows:

- Definition of the stakeholder engagement approach to construction and operation of the existing operations of UEDAŞ,
- Identification of resources and responsibilities for the implementation and monitoring of the stakeholder engagement program,
- Establishment of a grievance system for stakeholders, including addressing views and concerns.

1.3 Structure of Stakeholder Engagement Plan

The content of this Stakeholder Engagement Plan consists of the following elements:

- Definition of UEDAŞ and key environmental & social issues
- Identification of stakeholders, other impacted parties and customers in the operational phase
- Overview of previous stakeholder engagement activities
- Stakeholder engagement program and engagement methods

- Grievance mechanism
- Resources and responsibilities
- Reporting and monitoring

2 ABOUT UEDAŞ

UEDAŞ is an electricity distribution company with exclusive distribution rights in the distribution region No. 12 (also known as the UEDAŞ Region), which is among the 21 electricity distribution regions in Türkiye and covers the provinces of Bursa, Çanakkale, Balıkesir, and Yalova.

Uludağ Elektrik Dağıtım A.Ş. (UEDAŞ), whose privatization was completed on 01.09.2010, started its activities under Limak Holding. As of 01.04.2022, all rights of Uludağ Elektrik Dağıtım AŞ have been transferred to ACTIS. Since this date, based in Bursa, UEDAŞ maintains its duty with the understanding of reliable and uninterrupted service under the roof of ACTIS in the provinces of Balıkesir, Çanakkale, Yalova, and Bursa.

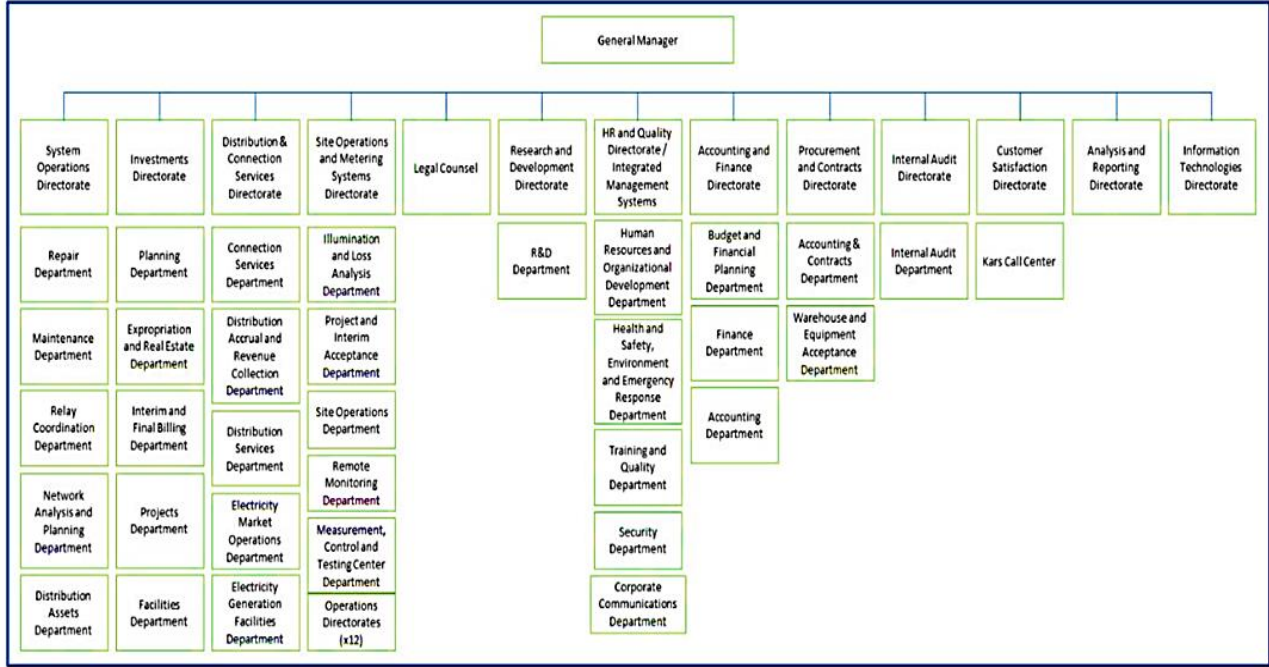
With its service area covering the south of the Marmara Region, the locomotive region of Türkiye, Uludağ Elektrik Dağıtım A.Ş. maintains its activities on an area of 35,501 km². Offering service for over 3.5 million subscribers in total in Türkiye's automotive centre Bursa, as well as Balıkesir, Çanakkale and Yalova, Uludağ Elektrik Dağıtım A.Ş. maintains its activities with the understanding of improving its infrastructure and offering better quality service in direct proportion to the increasing number of subscribers.



Figure 1: UEDAŞ Electricity Distribution Region No. 12

Within the scope of electricity distribution services, the field of activity of UEDAŞ includes the construction of new distribution facilities, capacity increase, maintenance and repair services, evaluation of connection applications, reading index from consumer meters, lighting works, meter replacement and calibration, combating technical and non-technical losses, providing services by minimizing electricity failures, reducing the duration & number of power outages and ensuring the continuity of electricity supply.

In 2022, 13,128 TWh (net) energy was distributed by UEDAŞ. The organizational structure consists of a general directorate located in Bursa and 12 affiliated Repair and Maintenance Units.



Organization Structure of UEDAŞ

2.1 Structure of UEDAŞ

There are 54 Repair and Maintenance Units (Arıza Onarım Bakım – AOB in Turkish) and 4 main warehouses in 4 provinces where UEDAŞ operates. All necessary equipment and materials are stored in these main warehouses and regularly transferred to the operating facilities according to defined stock levels.

PROVINCE	OPERATIONS DIRECTORATE	REPAIR AND MAINTENANCE UNITS (AOB) AND MAIN WAREHOUSES
BURSA	OSMANGAZİ	OSMANGAZİ REPAIR AND MAINTENANCE UNIT (AOB)
		BÜYÜKKORHAN REPAIR AND MAINTENANCE UNIT (AOB)
		HARMANCIK REPAIR AND MAINTENANCE UNIT (AOB)
		KELES REPAIR AND MAINTENANCE UNIT (AOB)
		ORHANELİ REPAIR AND MAINTENANCE UNIT (AOB)
		BURSA CENTRAL WAREHOUSE
	YILDIRIM	YILDIRIM REPAIR AND MAINTENANCE UNIT (AOB)
		GÜRSU-KESTEL REPAIR AND MAINTENANCE UNIT (AOB)
	İNEGÖL	İNEGÖL REPAIR AND MAINTENANCE UNIT (AOB)
		YENİŞEHİR REPAIR AND MAINTENANCE UNIT (AOB)
	NİLÜFER	NİLÜFER REPAIR AND MAINTENANCE UNIT (AOB)
		MUDANYA REPAIR AND MAINTENANCE UNIT (AOB)
	MUSTAFAKEMALPAŞA	M.K.PAŞA REPAIR AND MAINTENANCE UNIT (AOB)
		KARACABEY REPAIR AND MAINTENANCE UNIT (AOB)
BALIKESİR	GEMLİK	GEMLİK REPAIR AND MAINTENANCE UNIT (AOB)
		İZNİK REPAIR AND MAINTENANCE UNIT (AOB)
		ORHANGAZİ REPAIR AND MAINTENANCE UNIT (AOB)
BALIKESİR	BALIKESİR	BALIKESİR REPAIR AND MAINTENANCE UNIT (AOB)
		BALYA REPAIR AND MAINTENANCE UNIT (AOB)

		BİGADIÇ REPAIR AND MAINTENANCE UNIT (AOB)
		DURSUNBEY REPAIR AND MAINTENANCE UNIT (AOB)
		İVRİNDİ REPAIR AND MAINTENANCE UNIT (AOB)
		KEPSUT REPAIR AND MAINTENANCE UNIT (AOB)
		SAVAŞTEPE REPAIR AND MAINTENANCE UNIT (AOB)
		SINDIRGI REPAIR AND MAINTENANCE UNIT (AOB)
		SUSURLUK REPAIR AND MAINTENANCE UNIT (AOB)
		BALIKESİR WAREHOUSE
	BANDIRMA	BANDIRMA REPAIR AND MAINTENANCE UNIT (AOB)
		AVŞA REPAIR AND MAINTENANCE UNIT (AOB)
		ERDEK REPAIR AND MAINTENANCE UNIT (AOB)
		GÖNEN REPAIR AND MAINTENANCE UNIT (AOB)
		M.ADASI REPAIR AND MAINTENANCE UNIT (AOB)
		MANYAS REPAIR AND MAINTENANCE UNIT (AOB)
	EDREMIT	EDREMIT REPAIR AND MAINTENANCE UNIT (AOB)
		AKÇAY REPAIR AND MAINTENANCE UNIT (AOB)
		ALTINOLUK-K.KUYU REPAIR AND MAINTENANCE UNIT (AOB)
		AYVALIK REPAIR AND MAINTENANCE UNIT (AOB)
		BURHANİYE REPAIR AND MAINTENANCE UNIT (AOB)
		GÖMEÇ REPAIR AND MAINTENANCE UNIT (AOB)
		HAVRAN REPAIR AND MAINTENANCE UNIT (AOB)
ÇANAKKALE	ÇANAKKALE	ÇANAKKALE REPAIR AND MAINTENANCE UNIT (AOB)
		AYVACIK REPAIR AND MAINTENANCE UNIT (AOB)
		BAYRAMIÇ REPAIR AND MAINTENANCE UNIT (AOB)
		BOZCAADA REPAIR AND MAINTENANCE UNIT (AOB)
		ECEABAT REPAIR AND MAINTENANCE UNIT (AOB)
		EZİNE REPAIR AND MAINTENANCE UNIT (AOB)
		GELİBOLU REPAIR AND MAINTENANCE UNIT (AOB)
		GÖKÇEADA REPAIR AND MAINTENANCE UNIT (AOB)
		LAPSEKİ REPAIR AND MAINTENANCE UNIT (AOB)
		ÇANAKKALE WAREHOUSE
	BİGA	BİGA REPAIR AND MAINTENANCE UNIT (AOB)
		ÇAN REPAIR AND MAINTENANCE UNIT (AOB)
		YENİCE REPAIR AND MAINTENANCE UNIT (AOB)
YALOVA	YALOVA	YALOVA REPAIR AND MAINTENANCE UNIT (AOB)
		ALTINOVA REPAIR AND MAINTENANCE UNIT (AOB)
		ARMUTLU REPAIR AND MAINTENANCE UNIT (AOB)
		ÇINARCIK REPAIR AND MAINTENANCE UNIT (AOB)
		YALOVA WAREHOUSE

List of Operations directorates, main warehouses and AOBs



Panayır Main Warehouse



Panayır Main Warehouse

2.2 Distribution Network

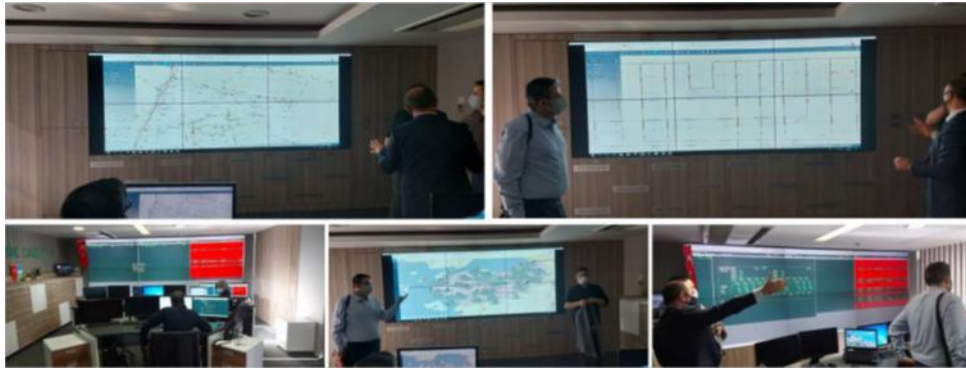
UEDAŞ has approximately 50,000 km of a distribution network consisting of aerial and underground power lines. Third parties also have distribution lines. The capacity of the electricity distribution lines and the number of transformers, poles and armatures belonging to UEDAŞ and third parties are given below.

ASSET NAME	TYPE	TECHNICAL SPECIFICATIONS	OWNED BY	
			UEDAŞ	THIRD PARTY
Distribution Line (km) LV: Low Voltage (up to 1 kV) MV: Medium Voltage (between 1 kV and 34.5 Kv)	LV	Aerial line (km)	19,047	393
		Underground line (km)	9,022	447
		Total (km)	28,069	839
	MV	Aerial line (km)	15,604	4,380
		Underground line (km)	3,394	1,026
		Total (km)	18,998	5,406
Number of Transformers			11,151	16,853
Transformer Power (MVA)			5,160	6,676
Number of Poles			765,141	89,008
Number of Armatures			535,171	33,125

UEDAŞ 2022 Distribution Network Assets

2.3 SCADA System

There is a SCADA system in place that allows instantaneous intervention in case of power outages and inspection of faults. SCADA (Central Control and Data Collection) system has been developed with the purpose of providing better quality and uninterrupted energy in the service area. The SCADA system is operated over the SCADA Control Center located in the UEDAŞ General Directorate System Operations Directorate building. Currently, the system carries out remote measurement, monitoring and control activities of stations consisting of total of 580 DM/IM/KÖK and Building type transformers. The SCADA system aims at the continuation of operations and minimizing losses.



SCADA system

2.4 Operating Performance

The operating performance parameters of UEDAŞ for the years 2021-2022 (energy distributed and number of customers served) are given below.

NUMBER OF SUBSCRIBERS	
2021	3.461.589
2022	3.556.627

CONSUMPTION SUBJECT TO DISTRIBUTION (MWH)	2021	2022
Lighting	313,694.27	335,134.07
Residence	3,908,380.25	3,907,847.10
Industry	4,600,706.74	4,793,717.55
Agricultural Irrigation	345,426.90	349,971.06
Business	3,640,915.70	3,740,782.61

UEDAŞ Operational Performance Parameters

PROVINCE	2022 INVESTMENT YEAR							
	NUMBER OF PROJECTS REALIZED (NUMBER)				PROJECT AMOUNT (TRY) (2022 CURRENT YEAR AMOUNTS)			
	Main Facility Construction Investments	Small Additional Facility Investments	Building Connection Line Investments	Total Number of Projects (Number)	Main Facility Construction Investments	Small Additional Facility Investments	Building Connection Line Investments	Total
BURSA	61	279	720	1,060	223,614,238	59,401,025	11,735,260	294,750,523
BALIKESİR	21	114	118	253	65,033,668	38,169,518	1,943,866	105,147,052
ÇANAKKALE	17	92	29	138	59,648,028	24,994,204	381,539	85,023,771
YALOVA	9	33	15	57	16,590,210	5,808,552	307,239	22,706,000
TOTAL	108	518	882	1,508	364,886,144	128,373,299	14,367,904	507,627,346

Investments Made in 2022

The most important improvement to be achieved by the project will be the alleviation of power outages, technical energy losses and similar problems related to electricity distribution in the UEDAŞ region. In addition to these, the

planned investments will also meet the needs of customers who will be newly included in the distribution system. On the other hand, some negative impacts that the Project may cause have also been identified. The breakdown of the company's investment items for 2023 and their breakdown within the network are shown in the tables below:

PROVINCE	2023 INVESTMENT YEAR*			
	NUMBER OF PROJECTS PLANNED (NUMBER)			
	Main Facility Construction Investments	Small Additional Facility Investments	Building Connection Line Investments	Total Number of Projects (Number)
BURSA	131	437	1,495	2,063
BALIKESİR	65	446	158	669
ÇANAKKALE	23	159	24	206
YALOVA	24	30	22	76
TOTAL	243	1072	1,699	3,014

Investments Planned for 2023
(*<https://www.uedas.com.tr/tr/yatirim-planlari>)

BREAKDOWN OF NETWORK INVESTMENT 2023	
Number of Transformers (Number)	248
Transformer Capacity (MVA)	152
Network Investments LV Line (km)	1399
Network Investments MV Line (km)	343

Breakdown of Investment (2023)

	INVESTMENT CHARACTERISTICS	2021 Investment Expenditure Amount (TL) (1)	2022 Investment Expenditure Amount (TL) (2)	2023 Investment Expenditure Amount (TL) (3)	2024 Investment Expenditure Amount (TL) (4)	2025 Investment Expenditure Amount (TL) (5)	Total Amount (TL) (1+2+3+4+5)
1	Network Investments	347.335.918	576.528.039	1.993.983.754	1.566.041.845	1.783.714.246	6.267.603.802
2	Investments with Legal Obligations	41.916.965	104.549.406	114.750.000	144.694.570	164.806.430	570.717.371
3	Network Operating System Investments	46.564.976	36.952.063	69.458.064	28.515.137	32.478.606	213.968.845
4	R&D Project Dissemination Investments	0	0	5.000.000	3.838.448	4.371.974	13.210.422
5	Other Expenditures Qualified as Investment Exp.	3.889.323	12.438.737	47.808.181	140.000.000	0	204.136.242
	Investment Total	439.707.182	730.468.245	2.231.000.000	1.883.090.000	1.985.371.256	7.269.636.682

Investment for 2021-2025 Period

2.5 Potential Environmental and Social Impacts of UEDAŞ

Environmental and Social Due Diligence (ESDD) study was carried out by MRC R&D ENERGY ENG. CONTROL AND TEST SERVICE INC. in May 2021 for the proposed financial investment program of the Project. The purpose of the ESDD study was to identify and evaluate the current or potential significant environmental and social impacts as well as proposing management/mitigation measures of the Project.

The project is being evaluated within the framework of Turkish laws, regulations and policies, EBRD ESP and Performance Requirements (PRs) and IFC Performance Standards (PSs) as the framework for environmental and social risks is clear and these risks can be mitigated with an action plan. As a result, it was classified as Category B, taking into account the EBRD's 2019 Environmental and Social Policy criteria.

However, during its environmental and social assessment, a number of potential adverse impacts related to existing activities were identified. To this end, UEDAS will implement specific actions to prevent, manage or mitigate any potential adverse environmental and social impacts that may be associated, including electricity distribution operations. Required mitigation measures to minimize significant environmental and social impacts are also shared within the scope of this document.

Current and new investment projects-related environmental and social impacts and risks have been identified within the scope of the environmental and social assessment study.

Within the scope of environmental and social assessment, in 2021 site visits were made to certain existing facilities, interviews were held with consultant, company's existing ESMS was reviewed, and existing activities within the framework of national legislation requirements and international standards.

The site visits included the sites in existing operations in Bursa, and site conditions included urban and rural settlements were assessed at the headquarter, main warehouse, operational centers, planned electrical distribution line route, and contractor work sites. Selected visits to mukhtars and affected landowners from

previous land acquisitions were also undertaken by the consultant. A detailed ESDD Report and Environmental and Social Action Plan have also been prepared as a result of assessments.

The ESDD study offers some improvement suggestions for existing businesses as well as to avoid, minimize and mitigate these negative effects. For these reasons, it will implement the necessary mitigation measures to prevent and mitigate the potential negative impacts of the planned investments of the Project, including the existing businesses of UEDAŞ.

Possible impacts and mitigation measures for these impacts are summarized in the table below;

IMPACT TOPIC	POTENTIAL IMPACT/SOURCE		PROPOSED REMEDIAL MEASURES
	SOURCE	SIGNIFICANCE	
EBRD PR1 Assessment and Management of Environmental and Social Impacts and Issues			
IFC PS1 Assessment and Management of Environmental and Social Risks and Impacts			
Integrated Management System	Improvement of the E&S Performance	High	<ul style="list-style-type: none">· Revised Environmental and social risk impacxt assessment and procedure· Include the requirement for the development and implementation of the Construction Environmental and Social Management Plan (ESMP) in the contracts· Development of a formal ESMP and field activities, implementation across all regions, covering contractors and third party management· Review the existing Environmental and OHS Policies and update them, if necessary, to cover UEDAŞ all field activities· Preparation and implementation of necessary environmental and social management plans within the framework of environmental, health and social impact management systems
Management of Contractors/ Subcontractors	Risks due to inadequate contractor management / insufficient control mechanisms	High	Improve existing Contractors management and monitoring/control mechanisms to managing and monitoring contractors within the framework of PR2/PS2 requirements
Climate Change	Climate change in the region to potentially impact UEDAS operational activities	Medium	Carrying out climate change risk assessment for UEDAŞ activities
EBRD PR2 Labour Conditions			
IFC PS2 Labour and Working Conditions			
Working Conditions	Risks due to noise, vibration, illumination, thermal comfort, and air quality measurements create risks in the work environment	Medium	<ul style="list-style-type: none">· Prepare and implement a workforce management and employee engagement program under EBRD PR 2 requirements· Making noise, vibration, lighting and thermal comfort measurements during construction processes· Establishing a permit system for non-routine activities

Wages, benefits, and conditions of work and accommodations	Noncompliance of workers work schedule with the ILO Conventions and EBRD PR2/IFC PS2 requirement	Medium	<ul style="list-style-type: none"> Preparation and implementation of Corporate Social Compliance Policy, HR Policy and HR Management System meeting EBRD PR 2/IFC PS2 standards Implementation of the requirements of the SA8000 based social compliance management system Performing internal audit report according to EBRD PR2/IFC PS2 requirements Providing training on local laws, regulations and ILO conventions regarding employee personal rights Measurable change in the gender balance of the workforce Developed and monitored Equal Opportunity Action Plan
Permit Requirements	Compliance to the legislative requirements regarding construction and operation permits (e.g. workplace permits, temporary waste storage permits, fire brigade permits etc.)	Medium	<ul style="list-style-type: none"> Compiling permit inventory Determining the deficiencies Taking actions to obtain permits
Grievances and Complaints	The company employees and contractor employees are not sufficiently aware of the grievance mechanism and its implementation.	Medium	<ul style="list-style-type: none"> Continue to apply the current Grievance Management System for permanent employees and subcontractor employees and informing employees about internal communication and complaint reporting channels Strengthening the grievance mechanism to handle anonymous grievances Training all company employees to raise awareness of the company grievance mechanism and employee representation system Community social tensions and complaints Continue and enhance the grievance management system for external stakeholders, project-affected people and other relevant parties
Gender-based violence	<ul style="list-style-type: none"> Affected employees/communities Customers: abuse, mistreatment, harassment, exploitation 	Medium	<ul style="list-style-type: none"> Complaint management procedure Workers Grievances

			<ul style="list-style-type: none"> · Code of Conduct/Ethics Line · Providing training to employees and contractors, contractor management over contractual commitments · Awareness raising activities for prevention through social media
Inclusion & Diversity	The low percentage of female employees within the scope of diversity and the absence of women-oriented initiative programs applications	Medium	<ul style="list-style-type: none"> · A tailored training programme developed and implemented, and 100 participants attaining accredited skills in total, including 50% women · Improved practices on equal opportunities.
EBRD PR 3 Resource Efficiency and Pollution Prevention and Control			
IFC PS3 Resource Efficiency and Pollution Prevention			
Hazardous Substances	<ul style="list-style-type: none"> · Hazardous materials are used in the operations including transformer oil, diesel oil, engine oil, paints, lubricants, and cleaning agents · PCB presence in older transformers · HCFC Gas presence (greenhouse gas) · Asbestos containing roofing material presence 	High	<ul style="list-style-type: none"> · Execution of asbestos investigation and appropriate disposal as required by regulations · Making an inventory for transformers containing PCBs and preparing a decommissioning plan, if necessary · Development of an equipment replacement plan for replacement air-conditioning equipment containing R-22 · Making an inventory of materials and chemicals used in all activities · Ensuring the implementation of hazardous materials handling procedures within the framework of the relevant legislation
Waste Management / Warehouse	Hazardous and non-hazardous waste material generated during construction and operations in all four provinces.	High	<ul style="list-style-type: none"> · Ensuring waste storage conditions in accordance with the legislation · Obtaining temporary waste storage permits · Fulfilling legal requirements regarding reporting and planning

			<ul style="list-style-type: none"> Major rehabilitation and retrofitting in the Main Warehouse (Panayır)
Wastewater	Failure to take the necessary measures in storage areas to prevent water pollution	Low	<ul style="list-style-type: none"> Making and evacuating gratings in storage areas Ensuring proper management of hazardous materials
Soil and Groundwater	Adverse impact to soil and ground water quality from the management of hazardous chemicals during operations	Medium	<ul style="list-style-type: none"> Updated Activity Preliminary Information Form for Main Warehouse Pollutant source control such as removal of transformers and waste on earth ground
EBRD PR 4 Health and Safety			
IFC PS4 Community Health, Safety and Security			
OHS/Community Safety & Security	The risks due to affect the society during operations to be carried out in the sites such as excavation, construction, installation, breakdown, maintenance and repair, and add mitigation and preventive studies to the risk analysis	High	<ul style="list-style-type: none"> Community health and safety risk assessment Community Health and Safety Management Plan Conducting electromagnetic field measurements at all sites of activity and where there is a risk of exposure to residents Include public health, safety and security issues in the risk assessment process Taking necessary security measures in construction activities (including raising public awareness about security) in order to ensure the safety of the public
Disaster & Emergency Preparedness	Risks exist for fire and natural disasters (earthquakes) in UEDAS operation buildings	High	<ul style="list-style-type: none"> Review of emergency exits, fire extinguishers, and ensure that businesses that have not yet received the Fire Brigade Compliance Report should complete the necessary deficiencies Develop the existing emergency response plan Establishing a (seismic risk) inventory of the buildings (existing physical condition, renovations made and/or planned to be made, age of the building, the biggest earthquake in the world) and preparing an action plan
Traffic Management	Injury or death of employees, contractor employees and/or the community in accidents that may occur during vehicle use and during field work in areas with traffic	Low	Development and implementation of the Traffic Management Plan

EBRD PR 5 Land Acquisition, Involuntary Resettlement and Economic Displacement			
IFC PS5 Land Acquisition and Involuntary Resettlement			
Expropriation	Land owners and users: Lack of access to information and grievance mechanism, loss of land and crops in seasonal, partial loss of assets	Medium	<ul style="list-style-type: none"> Review and finalize Land Acquisition/ Expropriation Procedure under EBRD PR 5 requirements Carry out information disclosure, participation activities and grievance mechanism in an inclusive manner especially for vulnerable groups
EBRD PR 6 Biodiversity and Living Natural Resources			
IFC PS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources			
Biodiversity	Biodiversity impacts from existing and future UEDAS investments as some of power lines are located near or in the vicinity of sensitive biodiversity areas	High	<ul style="list-style-type: none"> The biodiversity screening procedure, ecological risk assessment analysis and high-level assessments for all existing and new sites/assets Carrying out baseline evaluation studies for investment projects Preparation of a biodiversity action plan for critical habitat zones located at all project sites in the four UEDAŞ regions Develop a biodiversity policy and biodiversity management plan (BMP) to action on minimize in alignment with PR6 and PS6
EBRD PR 8 Cultural Heritage			
IFC PS8 Cultural Heritage			
Cultural Heritage	The potential presence of cultural heritage artifacts identified during the new investment	Low	Review the existing procedure and implementing on trainings on this subject to the contractors of UEDAŞ
EBRD PR 10 Information Disclosure and Stakeholder Engagement			
IFC PS1 Assessment and Management of Environmental and Social Risks and Impacts			
Stakeholder Management	<ul style="list-style-type: none"> Affected communities NGOs 	High	<ul style="list-style-type: none"> Updating the stakeholder engagement plan Implementation of the updated stakeholder engagement plan

	<ul style="list-style-type: none"> · Local authorities and regulatory bodies · Project Affected People · Vulnerable groups · Internal stakeholders, employees 		<ul style="list-style-type: none"> · Clarifying and developing the content and channels of stakeholder interaction and information to be shared (with a more proactive approach and content, including impact and risk management beyond reactive management of complaints and demands)
--	---	--	--

3 NATIONAL LEGISLATION AND INTERNATIONAL REQUIREMENTS

UEDAŞ works to fulfill its responsibilities towards the environment, the public and its customers in its service area. The main goal of UEDAŞ is to provide quality and consistent service with an environment-friendly attitude, taking into account the health and safety of its employees. For this purpose, it has established and operates an Integrated Management System that includes procedures, instructions and other necessary documents in environmental and social areas. Integrated Management System and related documentation have been prepared in accordance with the provisions of ISO 9001, ISO 14001, and ISO 45001 management system standards.

The Turkish Environmental Impact Assessment (EIA) Regulation (Official Gazette dated 25.11.2014 and numbered 29186) contains provisions regarding public engagement and disclosure of project information for the projects whose annexes are listed. Electricity distribution lines and related facilities are not covered under the annexes of the Turkish EIA Regulation, hence UEDAŞ operations are not subject to national EIA requirements.

UEDAŞ shares the information with its stakeholders on its website (investment plans within the region it is responsible for, energy consumption amounts, etc.) within the scope of the following legal regulations.

- 4982 Right to Information Law
- EMRA Quality Regulation on Distribution and Retail Sales Activities in the Electricity Market

EBRD and IFC's stakeholder engagement requirements are contained in the following documents:

- EBRD - Environmental and Social Policy (2019)
- EBRD - Access to Information Policy (2019)
- IFC - Environmental and Social Management System (2016)
- IFC - Access to Information Policy (2012)
- IFC - Stakeholder Engagement (2007)
- IFC PS 1 - Assessment and Management of Environmental and Social Risks and Impacts

Within the scope of the international standards, the core principles with regard to a comprehensive and effective project can be summarized as follows:

- Present meaningful information in an easy-to-understand language and align this information with the needs of the target stakeholder group(s) (including vulnerable groups and/or minorities)
- Providing information before and during the consultation activities and decision-making
- Providing information in a manner and location that stakeholders can easily access such information
- Exchanging views with reciprocal parties, listen to their opinions, and ensure that their problems are handled.
- Implementing processes in a way that they do not impose intimidation, coercion, or inducement
- Using communication channels to respond to people's concerns, suggestions, and managing grievance system to complaints
- Incorporating feedback into project or program design when appropriate and practicable, and reporting back to stakeholders

These principles will be adopted in line with the customer's point of view by review of the national legislation, EBRD, IFC, AIIB requirements and the best international practices.

4 UNDERSTANDING THE NEEDS AND EXPECTATIONS OF RELATED PARTIES

For the purposes of this plan, a stakeholder is defined as any individual, organization or group who is potentially impacted by the Project or who has an interest in the Project and its impacts. The purpose of stakeholder identification is to identify and prioritize Project stakeholders for consultation who may be impacted (either directly or indirectly in positive or negative way) by the Project or who have an interest in the Project but are not necessarily directly impacted by the Project. It is important to note that stakeholder identification is an ongoing process, and thus stakeholders will continue to be identified during different stages of the Project.

Stakeholders that may potentially be impacted due to future construction/operation related works of UEDAŞ are considered to include the following:

- ✓ Customers (including households, commercial businesses, and industrial facilities),
- ✓ Landowners/users,
- ✓ Local communities and businesses located in four regions (Bursa, Çanakkale, Balıkesir,, Yalova) within the operational area,
- ✓ Employees,
- ✓ Subcontractors(maintenance and repair, connection/cuts in electrical installations, meter reading, cleaning service, construction, cleaning etc.) and suppliers,
- ✓ Governmental organizations (e.g. Ministry of Energy and Natural Resources, Ministry of Environment, Urbanization and Climate Change, Ministry of Labor and Social Security and related public institutions)
- ✓ Regulatory institutions such as EMRA, TEDAŞ, TEİAŞ, EÜAŞ,
- ✓ Official institutions,
- ✓ Authorized local authorities and public institutions in four regions within our operation area
- ✓ Non-governmental organizations (eg. ELDER, Chambers of Electrical Engineers, Union etc.),
- ✓ Local and national media,
- ✓ General public.

If you are not on this list and would like to be informed about UEDAŞ, please contact UEDAŞ at the numbers on the last page of this SEP document.

Priority stakeholders for UEDAŞ are defined in the following sections.

4.1 Customers (including vulnerable groups)

Customers are among the most important stakeholders in terms of electricity distribution operations within the framework of the quality and efficiency of the services provided by UEDAŞ. Service users include residential subscribers, commercial/industrial businesses, and eligible customers.

Among the costumers, potential vulnerable groups will be given priority as stakeholders and their access to project information disclosure will be ensured. Such groups may include women, disabled people and certain disadvantaged groups (including illiterate people, elder people, people with special needs and similar). UEDAŞ determines in advance the customers who are considered vulnerable and who will be directly impacted by its activities and takes the necessary precautions so that they are not adversely impacted by such activities.

4.2 Neighbouring Communities and Facilities (including vulnerable groups)

Neighbouring communities and facilities to UEDAŞ facilities are among the important stakeholders both in relation to operational activities and future construction activities.

4.3 Landowners/Users (including vulnerable groups)

Investment activities may require the expropriation of private lands. During the expropriation process, UEDAŞ will inform the land owners/users who may be impacted expropriation process, about legal rights and restrictions during the construction and operation in advance through written notifications, information brochures, and face-to-face interviews, and offer support. These stakeholders will be identified during the preparation of the expropriation plan. In order to minimize expropriation needs, UEDAŞ will take all necessary measures to prevent physical resettlement and will mostly prefer public areas (e.g. roads, streets, parks, squares, etc.) in determining distribution network routes. In addition, potential negative impacts that may occur during construction will be monitored, all procedures will be implemented to prevent such impacts, grievance mechanism will be used to manage and resolve complaints and operational procedures will be implemented within the scope of sustainability targets, besides legal obligations, in order to compensate for the said impact if it occurs.

4.4 Employees

As of the end of 2022, the number of personnel employed in UEDAŞ is 766, of which 190 are women, representing 25% of the total workforce. UEDAŞ undertakes to comply with the Turkish Labor Law and EBRD/IFC requirements with regard to labour rights and working conditions.

UEDAŞ employees convey their requests, suggestions or complaints to the company management through the grievance mechanism called “UMAR”. In addition, regular employee satisfaction surveys, performance management system, employee feedback meetings, field visits and interviews with employee representatives are also feedback mechanisms used. Also, there is an Ethics Line, which is accessible to all employees and managed entirely by third parties, on matters falling within the scope of business ethics. Employees are informed about the feedback mechanisms in the recruitment and orientation processes from the moment they start working at UEDAŞ. Employees are also informed about feedback mechanisms through regular e-mail announcements, field meetings attended by various employee groups and employee representatives, and occupational safety and training events throughout the year.

4.5 Contractors/Suppliers

Subcontractors and suppliers are critical stakeholders in terms of ongoing operations and UEDAŞ-related activities. UEDAŞ regularly works with various subcontractors for services such as maintenance and repair,

opening/cutting in electrical installations, meter reading, civil works (above and underground), and cleaning services. 200 subcontractor employees on average work in the activities of UEDAŞ each month. Equipment and related service suppliers and suppliers of other services (such as maintenance of fire systems) are also considered among the stakeholders of UEDAŞ.

UEDAŞ expects all contractors and subcontractors to work and fulfill their obligations as per EBRD PR2/IFC PS2 and national legislation. UEDAŞ will actively implement the control mechanisms and the right to impose sanctions for the fulfillment of these obligations.

Most of the technical developments for making the UMAR application available to contractor and supplier employees have been completed, and it has been made available to all contractor and supplier employees as of June 2023. In addition, the Ethics Line has been opened to all contractor and supplier employees. Feedback mechanisms are explained at the meetings held at the beginning of the contractor's work. Feedback is also collected through field visits and inspections throughout the year.

4.6 Official Institutions

Official institutions can be grouped at national, provincial, district, and local (neighbourhood) levels. These institutions include UEDAŞ or authorities with legal responsibilities related to environmental or social issues and other organizations responsible for providing infrastructure related to UEDAŞ activities. The list of official institutions associated with UEDAŞ is as follows:

OFFICIAL INSTITUTIONS AND ORGANIZATIONS		
LEVEL	INSTITUTION/ORGANIZATION	RELATIONSHIP WITH UEDAŞ
NATIONAL	Ministry of Energy and Natural Resources (MoENR)	MoENR has a regulatory function that ensures the determination of energy targets and policies and the realization of energy production and consumption in line with these targets and policies. It establishes cooperation in all areas including crisis communication and customer satisfaction by communicating with distribution companies in a direct or indirect manner.
NATIONAL	The Grand National Assembly of Türkiye (TBMM)	Acting as a legislature with the authority given by the Turkish Nation by the constitution, TBMM is the constitutional state organ of the Republic of Türkiye. UEDAŞ submits printed or digital information/invitations to all members of this body on special days and events.
NATIONAL	Türkiye Elektrik Dağıtım A.Ş. (TEDAŞ)	In line with the 'Operating Rights Transfer Agreement' signed with this government institution, the ownership of distribution assets and new assets arising from investments belongs to UEDAŞ. The General Directorate of UEDAŞ carries out the expropriations and the processes for obtaining the road crossing rights for the determination of the distribution network routes. This institution also provides occupational and worker health training and relevant certifications. Also, regular meetings are held and joint studies are planned with this institution.

NATIONAL	Türkiye Elektrik İletim A.Ş. (TEİAŞ)	TEİAŞ was put into operation on 01.01.2001 to take over all transmission facilities in the country and to carry out electricity transmission, load distribution, and operation planning services. This institution may be contacted in various technical studies according to the scope of the subject.
NATIONAL	Energy Market Regulatory Authority (EMRA)	Distribution licenses are given to regional electricity distribution companies by EMRA. This competent authority also determines electricity tariffs, monitors service quality, and approves investment plans and expropriation requests of distribution companies. Having a critical place in the stakeholder plan as a consulted partner in projects, EMRA is also an important stakeholder of UEDAŞ.
NATIONAL	Ministry of Environment, Urbanization and Climate Change (MoEUCC)	MoEUCC has regulatory functions including environmental impact assessment permits and issuance of environmental permits. MoEUCC is capable of expressing opinions on the environmental impact assessment regulation.
NATIONAL	Ministry of Industry and Technology (MoIT)	MoIT verifies the meters used in distribution networks based on subscriber applications.
NATIONAL	Ministry of Health (MoH)	Due to the Covid-19 Pandemic, epidemic disease data within UEDAŞ are transmitted to the Ministry of Health.
NATIONAL	Ministry of Labor and Social Security (MoLSS)	MoLSS has special laws and regulations on labour and working conditions and occupational health and safety. This institution will be contacted during the processes of recruitment, work permits, social security and insurance payments. MoLSS is capable of organizing inspections on work and working conditions.
PROVINCE	Governorships	Governorships are the most authoritative bodies in provinces, which represent the national government. Contacts are made with this institution at various levels on issues that will affect the region. In addition, direct communication is made about requests and grievances with the team established under the governorships.
PROVINCE	Municipalities	These institutions are responsible for actions such as issuing permits and licenses for infrastructure and traffic planning works, as well as determining the necessary fees. Municipalities are among the most important local stakeholders of UEDAŞ. They are one of the groups that UEDAŞ directly works with in terms of stakeholder relations for maintaining relations with the request/grievance unit and establishing social project partnerships. In addition, decisions on land allocations, infrastructure construction permits, lighting poles and other issues are made through joint technical studies carried out with municipalities and municipal councils.

PROVINCE	Fire Brigade Departments	The fire department is the responsible unit in case of fires. This department is included in stakeholder relations with regard to AFAD exercises and meetings. In addition, it is one of the units that is in an indirect communication with the UEDAŞ Search and Rescue team.
PROVINCE	Provincial Directorates of Forestry	Regional Directorates of Forestry have regulatory obligations regarding permitting relevant forest crossings. They can also express opinions on future investment activities. This department is included in stakeholder relations due to AFAD exercises and meetings. In addition, it is one of the units that is in an indirect communication with the UEDAŞ Search and Rescue team.
PROVINCE	Provincial Directorates of National Education	In line with the protocols signed with the National Education Directorates, internship opportunities are provided to students within the body of UEDAŞ as specified in Vocational Education Law No. 3308. In addition, cooperation is made in many fields of education through the protocols signed at the management level. It is one of the most important partners of UEDAŞ in social responsibility projects.
PROVINCE	Regional Directorates of Highways	These agencies have regulatory obligations regarding the authorization of road crossings. They can also express opinions on future investment activities. In addition, directorates are included in the stakeholder group working on lighting poles and advertising activities.
PROVINCE	Provincial Directorates for Environment, Urbanization and Climate Change	Provincial Directorates for Environment and Urbanization have regulatory obligations concerning project-related environmental impact assessment permits and issuance of environmental permits. They can also express opinions on future construction activities.
PROVINCE	AFAD Provincial Directorates	These organizations are responsible for responding and managing emergencies. They are also directly related to the UEDAŞ Search and Rescue team and the operational units of UEDAŞ.
PROVINCE	Provincial Police Departments	The police are obliged to take the necessary actions in case of any crime. They have taken part in the social responsibility activities of UEDAŞ many times as stakeholders and are among the important partners.

PROVINCE	Provincial Health Directorates	111 Emergency Number is contacted in case of any adverse health event. This department is included in stakeholder relations because of AFAD exercises and meetings. In addition, it is one of the units that is in an indirect communication with the UEDAŞ Search and Rescue team.
PROVINCE	Provincial Culture and Tourism Directorates	This organization can express an opinion on the archaeological potential of future investment areas. It is one of the directorates that UEDAŞ includes in its social projects, from the idea stage to implementation, within the scope of its inclusive communication philosophy. Due to our Cultural Heritage Assets, the Regional Board of Conservation of Cultural Heritage is also one of our important stakeholders.
District/Local	District Governorships	District municipalities and district governorships and related units affiliated with these institutions may be critical in any emergency. In addition, these institutions and mukhtars near the investment activity areas may express their opinions on the activities. UEDAŞ has a Public Institutions and Organization Relations Department, which is in constant communication with the relevant organizations in the management of requests/grievances, and maintains the stakeholder relationship directly through several channels.
District/Local	District Municipalities	District municipalities and district governorships and associated units affiliated with these institutions may be critical in any emergency. In addition, these institutions and mukhtars near the investment activity areas may express their views on the activities. UEDAŞ has a Public Institutions and Organization Relations Department, which is in constant communication with the relevant organizations in the management of requests/grievances and maintains relations with stakeholders directly through various channels.
District/Local	Mukhtarates	The mukhtarates, one of the most influential stakeholders of a region, are among the most effective administrative units that maintain local communication between the government and the public. In this context, being in direct communication with the local people, it is one of the most important stakeholders of UEDAŞ.
District/Local	Mukhtarates	UEDAŞ has a Public Institutions and Organization Relations Department, which is in constant communication with the mukhtarates in the management of requests/grievances and maintains relations with stakeholders directly through various channels.



4.7 Non-Governmental Organizations (NGOs)

The list of non-governmental organizations that may be interested in UEDAŞ is given below:

NON-GOVERNMENTAL ORGANIZATIONS		
LEVEL	ORGANIZATION	RELATIONSHIP WITH UEDAŞ
NATIONAL	ELDER	The Electricity Distribution Services Association (ELDER) provides communication between all DISCOs as the umbrella organization of the electricity distribution companies engaged in electricity distribution activities throughout the country.
NATIONAL	TÜKODER	The Consumer Protection Association (TÜKODER) may express an opinion on the applications for the protection and development of consumer rights and for allowing the consumers to protect themselves.
LOCAL	Chamber of Electrical Engineers (Bursa, Çanakkale, Balıkesir, Yalova)	Conducts chamber registration of electrical engineers. Carries out the procedures related to matters falling within its competence.

LOCAL	Chamber of Electrical Technicians (Bursa, Çanakkale, Balıkesir, Yalova)	Carries out the procedures related to matters falling within its competence.
LOCAL	Chambers of Commerce and Industry (Bursa, Çanakkale, Balıkesir, Yalova)	Carries out the procedures related to matters falling within its competence.
LOCAL	Universities	Within the scope of the UEDAŞ communication plan, partnerships are established to contribute to the projects and the development of the projects is ensured.
NATIONAL	Banks	Banks are among the important stakeholders of UEDAŞ in depositing the wages, compensations, annual leave, wages, bonuses, etc. of the employees to their accounts in line with the legal requirements and fulfilling the banking transactions in accordance with the law and other conditions.
NATIONAL	UNION	Expresses opinions on social and economic rights and interests of employees through collective bargaining agreements and face-to-face meetings.
LOCAL	Women's Associations	Joint projects can be developed to increase awareness of the protection of women's rights and gender equality and to contribute to the economic empowerment of low-income women.
NATIONAL	SKD – WBCSD TURKEY	Benefit from the information on sustainability shared by the World Business Council for Sustainable Development (WBCSD) through the working groups established by this association.
NATIONAL	TUSIAD	Sharing good practices with the business world on sustainable development goals.
INTERNATIONAL	UN GLOBAL COMPACT (Being a signatory member)	It is an international organization that is included as a stakeholder in projects to be created within the scope of sustainability goals.

5 STAKEHOLDER ENGAGEMENT ACTIVITIES

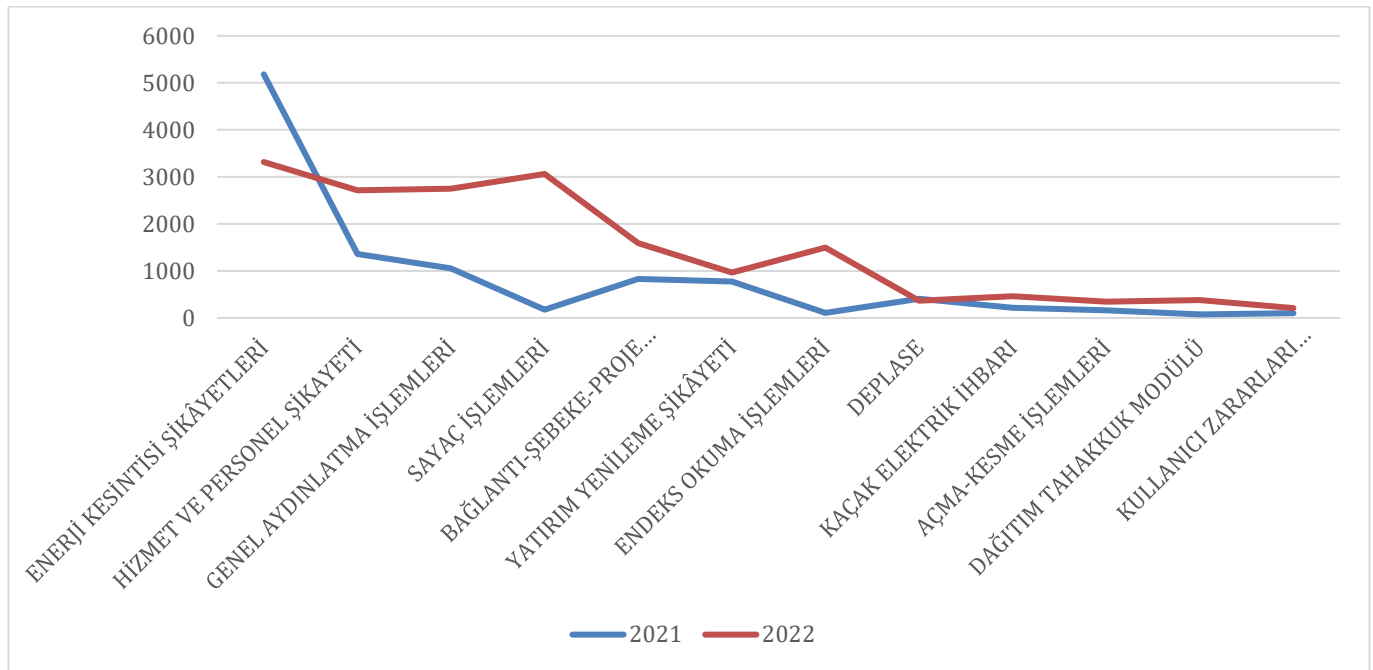
5.1 Customer Relations

Customer relations management and corporate experience within UEDAŞ are overseen and managed by Customer Experience Department. Customer relations covers all kinds of requests and grievances of the

customer regarding UEDAŞ and all kinds of information to be made to the customer from end to end. Customer relations are provided bilaterally through the customer channels listed below:

- Call Center (186)
- Mukhtar Hotline and Mukhtar Information System (0224 600 30 40)
- E-mail (halklailiskiler@uedas.com.tr; iletisim@uedas.com.tr)
- Website (www.uedas.com.tr)
- Online Transaction Center (<https://online.uedas.com.tr/>)
- Social Media (See Section 10)
- Local Institutions (Municipal/White Desk Collaboration)
- Repair and Maintenance Units
- Official E-mail Address (REM)
- Official Channels (CIMER, TEDAŞ, EMRA)
- Mukhtar Visits
- Mail (Written Notice)

All customer requests and grievances received through any customer channel are recorded in CRM. The relevant process is explained in further detail in the Grievance Mechanism section of this document.



2021-2022 Complaints based on subject

GRIEVANCES TOP 3- ÇANAKKALE	Total	Percent
New Connection Investments	253	22%
Meter Reading	181	16%
Outage /Faults	162	14%

GRIEVANCES TOP 3- YALOVA	Total	Percent
Outage /Faults	180	19%
Meter Reading	162	17%
Lighting	119	13%

GRIEVANCES TOP 3- BALIKESİR	Total	Percent
New Connection Investments	415	15%
Lighting	408	14%
Outage /Faults	344	12%

GRIEVANCES TOP 3- BURSA	Total	Percent
Lighting	1709	21%
Outage /Faults	1087	13%
Customer Services & Staff	905	11%

Grievances on 2022 based by provinces

5.2 Corporate Relations

All relations with the public and the press within the body of UEDAŞ are carried out by the Corporate Communications Department. In this context, information exchange takes place through the corporate website, social media accounts, and press releases.

UEDAŞ organizes meetings with local and national media agencies, non-governmental organizations, and official authorities. In addition to partnerships and exchange of ideas in the work carried out through annual communication activities, permits, and protocols are also prepared within this scope when necessary.

Regular communication meetings are held with the Ministry of Energy and EMRA. UEDAŞ has the information flow and is capable of implementation in the same axis as all other distribution companies within the Crisis Communication structure in Electricity Distribution created by these institutions.

UEDAŞ is a member of the Electricity Distribution Services Association (ELDER). Public services/public information announcements (TV-Radio), press releases, lobbying activities, and meetings with regulatory bodies are among the public information activities carried out by ELDER with regard to high electricity prices and electricity loss&theft. As a member of the ELDER Communication Committee, UEDAŞ also has a voice in the joint communication efforts to be implemented throughout the country and supports such efforts.

At the local level, corporate-level communication activities are carried out with all stakeholders, especially the Governorship. Management of Public Institution and Organization Relations is carried out by professionals employed for this job at UEDAŞ, and two-way communication is performed. In particular, direct meetings are held with the mukhtars, which are the closest persons to customers, requests and grievances are recorded, and resolution steps are followed.

Meetings are regularly held with non-governmental organizations and associations that are active in the region within the framework of social projects. In all projects carried out, the respective non-governmental organization is directly or indirectly involved in the work, from the brainstorming stage to the feedback point, and the aim is to directly contribute to both the project and the positive results created by the project.

6 STAKEHOLDER ENGAGEMENT APPROACH AND FUTURE STAKEHOLDER ENGAGEMENT PROGRAM

This section provides a summary of the proposed approach to stakeholder engagement for current electricity distribution operations and future investment activities. The main communication methods/mechanisms used and/or to be used by UEDAŞ in negotiations with important stakeholders are given in the table below:

Stakeholder Type	Information Content to Share	Engagement Tools	Phase
Customers (including residential subscribers and commercial/industrial facilities - vulnerable groups)	Project information and service/activity updates investment plans Planned outage and maintenance announcements	<ol style="list-style-type: none"> 1. Website (https://www.uedas.com.tr/) 2. Media announcements (newspapers, radio, and TV) 3. Social media 4. SMS 5. Flyers 6. Letter 7. Informing the governorships and related administrations in writing before the investment works and delivering information on them to the relevant customers 	Pre-construction, Construction Operation
	Grievance mechanism	<ol style="list-style-type: none"> 1. Call center (186) 2. Mukhtar Hotline and Information System 3. E-mail (Halklailiskiler@uedas.com.tr iletisim@uedas.com.tr) 4. Online Transaction Center 5. Social Media 6. Local Authorities (Municipality/White Desk Collaboration) 7. Operation Directorates (face to face meeting) 8. Official channels (CIMER, TEDAŞ, EMRA) 	

Stakeholder Type	Information Content to Share	Engagement Tools	Phase
Community	In particular, activities that may cause disturbance to nearby neighbourhoods (project information and updates on traffic disruptions, noise and dust generation, land, expropriation and livelihoods, impacts on them, community health and safety, land use restrictions, etc.)	1. Website (https://www.uedas.com.tr/) 2. Media announcements (newspapers, radio and TV) 3. Public brochures/flyers and posters at appropriate locations in directly affected settlements prior to construction, renovation or maintenance work 4. Face-to-face meetings in each affected community 5. Informing the local authorities in writing before the investment works and delivering information to the relevant communities through them	Pre-construction, Construction Operation
	Grievance mechanism	1. Call center 2. Mukhtar Hotline and Information System 3. E-mail (halklailiskiler@uedas.com.tr ;iletisim@uedas.com.tr) 4. Online Transaction Center 5. Social Media 6. Local authorities (Municipality/ White Desk Collaboration) 7. Operation Directorates 8. Official Channels (CIMER, TEDAŞ, EMRA)	

Stakeholder Type	Content of Information to be Shared	Engagement Tools	Phase
Land Owners/Users (including vulnerable groups)	Project information and updates, especially activities that require physical or economic displacement, compensation processes, legal rights of landowners/users	1. Written notification to the affected persons (letter, etc. as an official document) 2. Expropriation Brochure 3. Posters/information boards 4. Face-to-face consultation meetings 5. Negotiations, meetings and mutually signed	Pre-construction, Construction Operation

		agreements/protocols with the affected persons 6. Face-to-face meetings with vulnerable groups	
	Grievance mechanism	1. Call center 2. Mukhtar Hotline and Information System 3. E-mail (halklailiskiler@uedas.com.tr ;iletisim@uedas.com.tr) 4. Online Transaction Center 5. Social Media 6. Face-to-face meetings 7. Local Authorities (Municipality/White Desk Collaboration) 8. Operation Directorates 9. Official channels (CIMER, TEDAŞ, EMRA)	

Stakeholder Type	Content of Information to be Shared	Engagement Tools	Phase
Company employees	Project updates and changes in activities	1. Face-to-face meetings 2. Training 3. Workshops 4. Employee satisfaction surveys 5. UMAR 6. Meetings with union and employee representatives	Pre-construction, Construction Operation
	Employee grievance mechanism	1. E-mail 2. UMAR 3. Ethics Line	
	Code of Conduct	1. Orientation 2. Training	

Stakeholder Type	Content of Information to be Shared	Engagement Tools	Phase
Contractors and suppliers	Project updates and changes in activities	1. Face-to-face meetings 2. Regular OHS audits	Pre-construction, Construction Operation

		for contractor employees 3. Training 4. Workshops 5. Grievance mechanism	
	Grievance mechanism	1. Audits to be carried out by authorized personnel assigned within the company 2. Face-to-face meetings 3. Phone 4. E-mail 5. Grievance mechanism	
	Code of Conduct	1.Face-to-face Meetings 2.Audits	

Stakeholder Type	Content of Information to be Shared	Engagement Tools	Phase
Union/Employee Representatives	Employee grievance mechanism	1. Face-to-face meetings 2. Phone 3. E-mail 4. Mail (written notice) 5. UMAR 6. Regular meetings with union/employee representatives	Pre-construction, Construction Operation

Stakeholder Type	Content of Information to be Shared	Engagement Tools	Phase
Official Institutions	Project information and update	1. Face-to-face meetings 2. Uninterrupted communication with relevant regulatory stakeholders on permits, emergencies, and similar issues 3. Written notifications to local authorities prior to investment work	Before construction Construction Operation (face-to-face meetings at least twice a year)

Stakeholder Type	Content of Information to be Shared	Engagement Tools	Phase
Non-governmental organizations	Project information and update	1. Website (https://www.uedas.com.tr/) 2. Media announcements 3. Regular press releases 4. Face-to-face meetings 5. Uninterrupted communication with relevant stakeholders	Before construction Construction Operation (face-to-face meetings at least twice a year)

7 GRIEVANCE MECHANISM

All projects financed by EBRD shall be structured to meet the requirements of the EBRD Environmental and Social Policy which includes ten Performance Requirements (PRs) for key areas of environmental and social sustainability that projects are required to meet, including PR10 Information Disclosure and Stakeholder Engagement. In addition, EBRD's Independent Project Accountability Mechanism (IPAM), as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-impacted people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the EBRD has complied with its ESP and the Project-specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the EBRD.

7.1 Grievance Management for Employees and Contractors/Suppliers

7.1.1 Employees

Various feedback channels are used for UEDAŞ employees. Through these channels, all relevant employees are informed during the recruitment and orientation process and through announcements, meetings, etc. conducted through internal channels. In addition, the relevant policies guarantee that their requests and complaints will not be an element of retaliation for them and that their legal rights will be reserved.

UMAR: The UMAR platform is used to collect employee and contractor feedback and is managed by a 3rd party company. A committee has been established to evaluate the notifications received within UEDAŞ. All notifications are evaluated by the committee and necessary actions are taken. Committee consists of a chairman and members appointed by the senior management. Committee members are determined to be a minimum of one person from the human resources, sustainability and business directorates. The number of members can be increased as needed. Records are kept by the committee chairman in shared file on server. Responding is done with the method chosen while giving feedback on the application screen.

Ethics Line: It is the line established so that the reports are made by the employees within the scope of the Ethics Principles of UEDAŞ and managed by an independent company within the framework of the transparency principle. Employees can submit their reports anonymously using a dedicated phone line, e-mail address, and web address. All reports received on the Ethics Line are consolidated by the 3rd party company and reported to the Audit and Risk Committee. All notifications are evaluated by the committee and necessary actions are taken. Records are kept by Internal Audit Department. Responding is done with the method chosen while giving feedback on the application screen.

For both UMAR and Ethics line, it is possible to make anonymous complaint.

Employee Satisfaction Surveys and Performance Management System: Employees express their requests and grievances through satisfaction surveys and performance management system that are conducted once a year.

The feedbacks received through them are evaluated by the Human Resources department and necessary actions are taken. Records are kept by Human Resources Department.

Besides these, one-to-one interviews with employees and field visits are also used as feedback mechanisms.

7.1.2 Contractors/Suppliers

Contractors/suppliers, like employees, express their requests and grievances via the UMAR and the Ethics Line. In addition, requests and grievances are also received during site visits, and Occupational Safety, Environmental and Social Compliance audits. The audit records are kept by OHS Department.

7.2 Grievance Management of Land Owners/Users and Other Stakeholders

In UEDAŞ, customers, official channels, and channels where grievances sent by the society are received, and the management methods of these channels are explained below.

- **Call Center (186):** The call center located in Kars location works 24/7 and responds to calls. Incoming calls are received by customer representatives and recorded in the CRM, and resolved by direction to the relevant units according to their subjects.
- **Mukhtar Hotline and Mukhtar Information System:** It is a dedicated hotline established with the purpose of managing the demands and grievances of mukhtars in a quick and effective manner. Incoming calls are received by the call center and directed to the relevant units and resolved.
- **E-mail (halklailiskiler@uedas.com.tr ; iletisim@uedas.com.tr) :** The e-mail channels of the company are managed by the Customer Experience Department. Incoming requests and grievances are directed to the relevant departments and resolved.
- **Online Transaction Center:** It is managed by the Customer Experience Department. Incoming requests and grievances are directed to the relevant departments and resolved.
- **Social Media and Press/Publications:** These are managed by the Corporate Communications Department. Requests and grievances received via social media are responded to regularly, and those that need a solution are directed to the relevant units and resolved. The news in the press/media organs is followed through media agencies, and actions are taken regarding positive/negative news, requests, and grievances.
- **Local Authorities (Municipality/White Desk Collaboration):** Managed by the Corporate Communications Department. Incoming requests and grievances are directed to the relevant departments and resolved.
- **Operations Directorates:** Face-to-face applications, requests and grievances submitted to the repair and maintenance units are received by the document registration units through the general application form, recorded in the CRM system, and resolved by being forwarded to the relevant units.
- **Official E-mail Address (REM):** Requests and grievances sent to the REM address managed by the Document Registration Unit are delivered to the relevant units via DMS and resolved.
- **Official Channels (CIMER, TEDAŞ, EMRA, TEDAŞ Lighting Application):** Requests and grievances received by official letter are forwarded to the relevant units by the Document Registration Unit via DMS and resolved.
- **Mail (Written Notification):** Mails received by the Document Registration Unit are forwarded to the relevant units via DMS and resolved.

All customer requests and grievances received through any of the specified channels are recorded in the CRM. Records are monitored by all units through the CRM system BIDA reporting platform so that all customer requests and grievances are finalized and answered within the target time. As per the relevant regulations, customer complaints received by the company must be answered within 15 working days, and this period is regularly measured and reported. In case the grievances of the stakeholders are part of a legal process or if the grievance turns into a legal process after being received by the company, the issue is handled by the Legal Counsel.

7.2.1 Receipt and Recording of the Grievances

Following the receipt of the grievance by our Company, it is examined whether the grievance is an issue within the region and/or within the responsibility of our Company. In case the grievance is outside of UEDAS's area of responsibility and/or its responsibility:

- If the grievance is received through the official channel, the grievance will reach our Company via REM (Registered Electronic Mail) and will be recorded in the CRM (Customer Management System) following a preliminary analysis by the Customer Ambassador. The REM return letter is approved by the relevant persons and sent to the relevant institution via REM and to the stakeholder by mail. The grievance is analyzed, and its record is closed in CRM by the Customer Ambassador.
- If the grievance reaches UEDAS through other channels, a CRM record is created directly. The Customer Ambassador, by contacting the customer, receives detailed information about the content of the grievance and the area of responsibility and provides information, then analyzes the grievance and finalizes the recording in the CRM.

In case the grievance is within the scope of UEDAS's responsibility:

- In the event that it is received through an official channel, it is communicated to UEDAS via REM to the person concerned via DMS (Document Management System). The grievance is pre-analyzed by the Customer Ambassador and recorded in the CRM.
- In case the grievance reaches our Company through other channels, a CRM record of the grievance is created by the Customer Ambassador.

In the event that the grievance submitted by the stakeholder is specific to a customer problem, the CRM record is opened. In case it is a grievance about a process, application, or general situation, it is followed up through the DMS.

Grievances received by any channel are recorded in the CRM system. In case the stakeholder grievance sent to REM address is related to customer processes, it is handled by the relevant department in the Customer Experience unit, if it is related to a different application or process or if it is part of a legal process. (The REM address is the official e-mail address of the Company. Any notification made to the REM address is deemed to have been received by the Company.)

7.2.2 Resolution of the Grievances

Regardless of the channel through which the grievances are received, the grievance flow process is implemented jointly. In the event that the complainant's information is missing, the relevant stakeholder is contacted and the missing information is completed and the subject of the grievance is confirmed. In case the mentioned grievance is within the scope of the relevant business or the contractor company, the grievance is transferred to the relevant business or the relevant unit responsible for the contractor company. Following the receipt of a response from the relevant business or the relevant unit, the customer is contacted for the purpose of informing them about the solution offered or the planned resolution date.

All incoming grievances are primarily evaluated according to official legislation. For stakeholders who do not want to share their information, grievance record may be opened from any channel, even without contact or identity information.

7.2.3 Response to Grievances

The grievances of the stakeholders are responded to within the target resolution times determined according to the subject and the outcome is conveyed to the customer through the communication method requested. In case it is not possible to provide a solution to the stakeholders immediately, a promise for a solution at a later date is given and the customer is informed about the date and content of such a solution. The grievance and its solution are taken under a follow-up process and a reminder is made to the relevant business or the relevant unit when the resolution period comes.

Following the completion of the review of the grievance, the answers containing the necessary solutions and official notifications are prepared and delivered to the customer. In case the customer's complaint is found to be justified and a solution has not been provided yet, it is followed up through the record created in the Solution Tracking system, and when it is resolved, the customer is informed in this regard.

In cases where customers do not accept the solution provided or the answer given, a detailed explanation is made, and notification is given that they may seek their rights through legal means if they wish so.

7.3 Grievances about Gender Based Violence and Harassment

Within the scope of EBRD PRs and IFC PSs requirements, UEDAŞ establishes a separate system for receiving and resolving feedbacks from employees and contractors/subcontractors regarding GBVH. It has been decided to authorize a personnel within the company by receiving special training on the subject. The system is planned to be commissioned in 2023.

7.4 Reporting of Grievances

The grievances of the stakeholders are regularly followed up by the Company Management and the relevant departments are given targets based on the number of grievances and their reasons.

Regional and subject-based analyzes are made and solutions are sought for the reduction of problems. In addition, technical quality, commercial quality and service quality reports are also published within the scope of official legislation.

Grievance by	Reporting Period/Channel
Employee	<ul style="list-style-type: none"> Monthly (UMAR) For three months (Ethics Line) Annually (Employee Satisfaction Surveys and Performance Management System)
Contractors/Suppliers	<ul style="list-style-type: none"> Monthly (UMAR) For three months (Ethics Line) Monthly (Audits)
Land Owners/Users Other Stakeholders	<ul style="list-style-type: none"> Monthly (all channels)

8 RESOURCE AND ORGANISATIONAL ARRANGEMENTS

The implementation of this SEP will be carried out and monitored by UEDAŞ “Uludağ Elektrik Dağıtım A.Ş”.

The units responsible for the implementation of this SEP, along with their main roles, include:

Unit	Task/Responsibility
Sustainability Directorate	<ul style="list-style-type: none"> Coordinates the preparation of an annual SEP Implementation Report
Management Systems Department	<ul style="list-style-type: none"> Preparation of Stakeholder Engagement Plan Providing organization with relevant departments to update SEP every year
Corporate Communications Department	<ul style="list-style-type: none"> Social media and website management Follow-up and coordination with other departments responsible for engagement activities, production and distribution of information disclosure tools, etc. Coordination of the engagement of the mukhtars in general information disclosure and engagement activities, as well as in the projects Organization of meetings with internal and external stakeholders, media relations, and management of announcements, website announcements, and updates Production of documentation, brochures, and posters to be used in information and

	<p>engagement activities</p> <ul style="list-style-type: none"> • Update of stakeholder tables and engagement programs
System Operations Directorate	<ul style="list-style-type: none"> • Update of distribution assets inventory information
Customer Experience Management	<ul style="list-style-type: none"> • All processes related to customers (management of grievances) • All processes related to employees (management of UMAR)
OHS and Environment Directorate	<ul style="list-style-type: none"> • Evaluation and update of the environmental and social impacts of UEDAŞ
Legal Consultancy Department	<ul style="list-style-type: none"> • Management of relations with regulatory stakeholders regarding permits, emergencies
Audit and Risk Committee	<ul style="list-style-type: none"> • All processes related to the Ethics Line (management of grievances)
Investment Directorate	<ul style="list-style-type: none"> • Update of the investment tables of the relevant year and the next year within the scope of investment plans • Preparation, control, acceptance, and approval of expropriation projects on behalf of UEDAŞ • Notifications to governorships/related administrations and local administrations before investment activities, distribution of informative brochures/statements and posters to appropriate points in settlements before investment activities • Holding information meetings with stakeholders impacted by expropriation process in the impacted settlements, identifying and recording vulnerable groups, distributing brochures and other printed materials

9 REPORTING OF SEP

Data on stakeholder engagement plan activities are prepared by the relevant units and transferred to the Sustainability Directorate. The preparation, reporting and sharing of the annual report with all stakeholders is carried out under the leadership and coordination of the Sustainability Directorate.

The report prepared contains the data of the past year and the current year and is shared with the stakeholders on the website every year.

10 COMPANY CONTACT INFORMATION

The contact information of UEDAŞ and related units regarding the submission of grievances is given below.

UEDAŞ “ULUDAĞ ELEKTRİK DAĞITIM AŞ”

Address: Çırpan Mahallesi Stadyum Caddesi No:40 16050 Osmangazi / Bursa

E-mail: halklailiskiler@uedas.com.tr

REM address: uedas@hs03.kep.tr

Phone: 0 (224) 600 00 00

Customer Call Center: 186

Fax: 0 (224) 271 65 00

Website: <https://www.uedas.com.tr/>

Online Transaction Center: <https://online.uedas.com.tr>

CİMER: <https://www.cimer.gov.tr/>

Official Social Media Accounts:

Facebook: <https://www.facebook.com/uedascomtr>

Twitter: <https://twitter.com/uedascomtr>

Instagram: <https://www.instagram.com/uedascomtr/>

LinkedIn: <https://www.linkedin.com/company/uedas>

Youtube: <https://www.youtube.com/c/uedascomtr>

11 APPENDIX

11.1 Abbreviations

UEDAŞ: Uludağ Elektrik Dağıtım Anonim Şirketi

NGO: Non-governmental Organization

TWH: Terawatt/Hour

SEP: Stakeholder Engagement Plan

LV: Low Voltage

KV: Kilovolts

MV: Medium Voltage

AOB: Repair and Maintenance Unit

MVA: Megavolt Amper

SCADA: Supervisory Control and Data Acquisition

EIA: Environmental Impact Assessment

IMS: Integrated Management System

TS: Turkish Standard

EN: European Norm

ISO: International Organization for Standardization

IFC PS2: International Finance Corporation Performance Standard 2

MoENR: Ministry of Energy and Natural Resources

TBMM: The Grand National Assembly of Türkiye

TEDAŞ: Türkiye Elektrik Dağıtım A. Ş.

TEİAŞ: Türkiye Elektrik İletim A.Ş.

EMRA: Energy Market Regulatory Authority

MoEUCC: Ministry of Environment, Urbanization and Climate Change

MoIT: Ministry of Industry and Technology

MoH: Ministry of Health

MoLSS: Ministry of Labor and Social Security

EDAŞ: Elektrik Dağıtım A.Ş.

TES-İŞ: Turkish Energy, Water and Gas Workers' Union

ELDER: Electricity Distribution Services Association

TÜKODER: Consumer Protection Association

CRM: Customer Relationship Management

DMS: Document Management System

OHS: Occupational Health and Safety

AFAD: Disaster and Emergency Management

REM: Registered Electronic Mail

EBRD: European Bank for Reconstruction and Development

AIIB: Asian Infrastructure Investment Bank

UMAR: Uludag Energy Happiness Tool

11.2 General Application Form

The form used in operation directorates for face-to-face applications of stakeholders.



..... İşletme Müdürlüğü' ne

Tarih...../...../20.....

Müracaat Sahibi			
*Adı Soyadı		*TC Numarası	
*Abone No		*Telefon	
*Yazışma Adresi			
Talep Adres Açıklaması			
		*İmza	

<input type="checkbox"/> Şebeke Güzergah Değişikliği	<input type="checkbox"/> Sanayi Sicil Belgesi (Serbest Tüketici)
<input type="checkbox"/> Kaçak Kullanım İhbarı	<input type="checkbox"/> Kaçak Kullanım İtirazı
<input type="checkbox"/> Şebeke- Direk- Lamba Talebi	
<input type="checkbox"/> Adres Bilgisi Güncelleme	<input type="checkbox"/> Şebeke- Abone Arıza Bildirimi
<input type="checkbox"/> Sokak Aydınlatma Arıza İhbarı	<input type="checkbox"/> Abone Tahliye (Serbest Tüketici)
<input type="checkbox"/> Fatura/Kesme İhbarnamelerinin Bırakılmaması	
<input type="checkbox"/> Cihaz Hasarı Başvurusu	<input type="checkbox"/> Cihaz Hasarı Fatura İbrazi
<input type="checkbox"/> Diğer Müşteri Talepleri	<input type="checkbox"/> Yapı Bağlantı Hattı Talebi
<input type="checkbox"/> İmar İzin Belgesi (Seviye Tespit Tutanağı , Yapı Kullanma İzni , Yapı Kayıt Belgesi ve Diğerleri)	
Açıklama:	

*İşareti ile belirtilen alanların doldurulması ve formun arkasındaki aydınlatma metninin altına imzalanması zorunlu olup, doldurulmaması halinde başvurunuz işleme alınmayacaktır.

Yukarıda işaretlediğim ve açıklama kısmında belirttiğim hususların incelenerek gereğinin yapılmasını arz ederim.

Dok. Kodu: FR.130

Sayfa No: 1

Haz. Tar: 18.10.2017

Rev. No: 9

Rev. Tar: 20.06.2022

11.3 Online Transaction Center


Üye
Ol


Üye
Girişi

ULUDAĞ ELEKTRİK DAĞITIM

Online İşlem Merkezi

Ana Sayfa

Aktif Elektrik Kesintileri

Planlı Elektrik Kesintileri

Talep/Başvuru Girişi

Proje İşlemleri

Enerji Müsadesi Başvurusu

Geçici Kabul Süreci Başvurusu

Taleplerim/Başvurularım

Tazminat Başvuru

Tesisat/Abone Bilgileri

Fatura Ödeme

Enerji Tedarik Şirketleri

Görevli Tedarik Şirketi

Mühendis/Fen Adamı Yeni Kayıt

Endeks Girişi

Tedarikçi Girişi




Enerji Müsadesi
Başvurusu


Aktif Elektrik
Kesintileri


Canlı Yardıma
Bağlan


Proje
İşlemleri


Tesisat/Abone
Bilgileri

Uludağ Elektrik Dağıtım **Online İşlem Merkezi**'ne hoş geldiniz.
Size nasıl yardımcı olabiliriz?



