



OEDAŞ
OSMANGAZİ ELEKTRİK DAĞITIM



Stakeholder Engagement Plan

OEDAŞ

2021
OEDAŞ

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1. INTRODUCTION

1.1 Overview

This document presents the Stakeholder Engagement Plan (“SEP”) for the financing of OEDAŞ’ capital expenditures program including distribution network expansion, upgrade and rehabilitation to support efficiency improvement, network stability and enhance service quality (the “Project”). The lender for the Project is European Bank for Reconstruction and Development (“EBRD”) and International Finance Corporation (“IFC”). The Project is currently subject to investment planning and lenders’ approval for financing the period of 2021-2025.

This SEP has been developed by OEDAŞ as a public document, in order to present plans for stakeholder engagement, consultation and disclosure in line with the environmental and social policies of OEDAŞ, international standards and lenders’ requirements. The SEP is a living document, which is to be updated for each phase of the Project and as needed.

1.2 Who are we?

OEDAŞ is an electricity distribution company with exclusive distribution rights in the provinces of Eskişehir, Afyon, Uşak, Kütahya and Bilecik (known as OEDAŞ region), serving to the 16th region among the total 21 electrical distribution regions in Turkey.



OEDAŞ Electricity Distribution Region No: 16

OEDAŞ presently delivers 24-hour uninterrupted energy distribution services in OEDAŞ region to approximately 1.9 million subscribers serving a population of 2.79 million in 125 towns and 1457 villages, within 59 districts within a surface area of 49,344 km² up to 300 km distance in north-south direction and up to 270 km distance in east-west direction through an operating distribution network of 50,787,11 km. OEDAŞ distributed a total net energy of 6,777,54 TWh in 2020 (net). The organizational structure comprises of one Gas and Electrical Distribution General Manager who overlooks and is responsible for the entire OEDAŞ business unit. The General Manager receives reports from an Electrical Distribution Director located in Eskişehir headquarters office, who manages distribution, system operation, control system, quality, environmental, health and safety (QEHS), legal affairs, human resources and administration, tariffs and regulation, property expropriation, and investment planning departments at the head office in Eskişehir. In addition, there is a total of five

operation managers for Eskisehir, Afyon, Kutahya, Bilecik, and Usak regions who report directly to the Electrical Distribution Director.

Within the scope of the investment program for electricity distribution services, the area of activity of OEDAŞ includes construction of new distribution facilities, conducting capacity increases, construction of additional facilities for the existing network, conducting maintenance and repair services, evaluation of connection applications, providing service through executing network connection agreements with the consumers, reading the indexes from the consumer meters, conducting lighting works, conducting replacement and calibration works for the meters, tackling with the technical and non-technical losses, conducting services for minimizing the electrical failures, the duration and number of power cuts and ensuring the continuity of electricity supply.

1.3 Purpose of Stakeholder Engagement Plan (SEP)

The main goal of this SEP is to ensure that project-affected people and other stakeholders are provided relevant, timely and accessible information and are engaged in meaningful consultation so that they have an opportunity to express their views and concerns about the Project and its impacts and mitigation measures. Stakeholder engagement process helps to:

- identify and involve all potentially affected stakeholders;
- generate a good understanding of the project among those that will be affected;
- identify issues early in the project cycle that may pose risks to the project or its stakeholders;
- ensure that mitigation measures are appropriate (implementable, effective and efficient); and
- establish a system for long-term and mutual communication between the Project and communities and customers that is of benefit to all parties.

The main purposes of this document are to:

- define a consultation approach as well as activity and implementation framework for stakeholders in relation to land acquisition, construction and operation of the Project as well as existing operations of OEDAŞ;
- identify resources and responsibilities for implementation and monitoring of the consultation program; and
- set up a grievance mechanism for the stakeholders, including a process to address views and concerns.

1.4 Structure of the SEP

Contents of this SEP include the following:

- Project description and key environmental and social issues;
- Public consultation and information disclosure requirements;
- Identification of stakeholders and other affected parties and customers during operation phase;
- Overview of previous stakeholder engagement activities;
- Stakeholder engagement programme and methods of engagement;
- Grievance Mechanism;
- Resources and Responsibilities; and
- Monitoring and Reporting.

2. PROJECT INFORMATION

2.1 Project background

2.1.1 Distribution Network and Facilities

OEDAŞ has approximately 50.787,11 km of distribution network consisting of aerial lines and underground lines. Third parties also own distribution lines. The capacity of the electricity distribution lines and the number of transformers, poles and armatures owned by OEDAŞ and the third parties are given below. Installation of oldest facilities within the distribution network date back to 1960s.

*OEDAŞ Distribution Network Assets**

Asset Name	Type	Technical Properties	Owned by	
			OEDAŞ	Third Party
Distribution Lines (km) LV: Low Voltage (up to 1 kV) MV: Medium Voltage (1 kV to 34.5 kV)	LV	Aerial line (km)	18.192,38	406,46
		Underground line (km)	5.362,43	241,06
		Total (km)	23.554,81	647,52
	MV	Aerial line (km)	15.880,78	8.039,55
		Underground line (km)	1.990,73	673,72
		Total (km)	17.871,51	8.713,27
Number Transformers			8.403	18.552
Number of Poles			671.654	109.946
Number of Armatures			349.015	15.625

**Updated with data by end 2020*

OEDAŞ assets also include administrative buildings, client service centers, repair and maintenance units, main warehouses, operational warehouses, and transformer stations.

Repair and Maintenance Units / Warehouses:

Of the 59 districts OEDAŞ operate in, there is a total of 43 Repair and Maintenance Units and five main warehouses distributed in five OEDAŞ regions. All necessary equipment and materials are stored in this main warehouse and regularly transferred to operation facilities based on defined stock levels.



Sultandere Main warehouse in Eskisehir Province

List of Repair and Maintenance Units / Warehouses

Regions (Provinces)	Districts	Facilities
Eskisehir	Central	Repair & Maintenance Unit, Main
	Sultandere	Main Warehouse
	Beylikova	Repair & Maintenance Unit
	Çifteler	Repair & Maintenance Unit
	Günyüzü	Repair & Maintenance Unit
	İnönü	Repair & Maintenance Unit
	Kirka	Repair & Maintenance Unit
	Mahmudiye	Repair & Maintenance Unit
	Alpu	Repair & Maintenance Unit
	Mihaliççik	Repair & Maintenance Unit
	Sarıcakaya	Repair & Maintenance Unit
	Sivrihisar	Repair & Maintenance Unit
Afyonkarahisar	Central	Main Warehouse
	Central	Repair & Maintenance Unit, Main
	İscehisar	Repair & Maintenance Unit
	Dinar	Repair & Maintenance Unit
	Dazkiri	Repair & Maintenance Unit
	Çay	Repair & Maintenance Unit
	Emirdağ	Repair & Maintenance Unit
	Sultandağı	Repair & Maintenance Unit
	Sinanpaşa	Repair & Maintenance Unit
	Bolvadin	Repair & Maintenance Unit,
	Şuhut	Repair & Maintenance Unit
	Sandıklı	Repair & Maintenance Unit
	İhsaniye	Repair & Maintenance Unit
Kutahya	Central	Repair & Maintenance Unit, Main
	Central	Main warehouse
	Gediz	Repair & Maintenance Unit
	Altıntaş	Repair & Maintenance Unit
	Çavdarhisar	Repair & Maintenance Unit
	Emet	Repair & Maintenance Unit
	Tavşanlı	Repair & Maintenance Unit
	Simav	Repair & Maintenance Unit
	Domaniç	Repair & Maintenance Unit
	Hisarcık	Repair & Maintenance Unit
Bilecik	Central	Repair & Maintenance Unit, Main
	Central	Main warehouse
	Söğüt	Repair & Maintenance Unit
	Gölpazari	Repair & Maintenance Unit
	Pazaryeri	Repair & Maintenance Unit
	Osmaneli	Repair & Maintenance Unit
	Bozüyük	Repair & Maintenance Unit
Usak	Central	Repair & Maintenance Unit
	Central	Main warehouse
	Ulubey	Repair & Maintenance Unit
	Sivaslı	Repair & Maintenance Unit
	Eşme	Repair & Maintenance Unit
	Banaz	Repair & Maintenance Unit

Transformers and Distribution Centers

There is a total of 26.955 transformers within the OEDAŞ network. The total installed power of transformers is 7.855 MVA (2020). The transformers are hermetic, expansion tank, oily and dry types.

SCADA System

SCADA (Supervisory Control and Data Acquisition) is developed to provide a better quality and uninterrupted power service within the distribution network. It aims to maintain business continuity and minimization of the outage times. Based on SCADA many automatic counters, transformers, electricity transport lines will be reconstructed.

2.1.2 Operational Performance

Past, present and projected operational performance parameters of OEDAŞ (in terms of distributed energy and number of customers served) are given in the table below (A: Actual, F: Forecast). The distributed energy is expected to grow from 6.777,54 GWh in 2020 to 7.554,48 GWh in 2023 which corresponds to 11,46% growth, and customer base is expected to grow from 1,88 million customers in 2020 to 2,05 million by 2023. The loss/theft ratio for 2020 was recorded at 6,54% and targeted ratio for the upcoming years is 7,033%. The net consumption in the OEDAŞ region in 2020 is 19%, 9%, 28%, 6% and 41% by industrial, commercial, residential customers, irrigation and lighting, and eligible customers, respectively. The same trend is also expected in the future.

OEDAS Operational Performance Parameters

Figures	2014 A	2015 A	2016 A	2017 F	2018 F	2019 A	2020 A	2021 F	2022 F	2023 F
Distributed Energy (GWh)	6,044.50	6,199.08	6,341.26	6,581,46	6,764,15	6,671.28	6,777.54	6,981.61	7,299.01	7,554.48
# Of Customers	1,565,042	1,611,585	1,661,395	1,720,217	1,786,452	1,839,538	1,888,406	1,939,336	1,990,264	2,043,733
Loss/Theft Ratio	7.61	7.62	5.75	6.97	6.41	6.61	6.54	7.08	-	-

*A: Actual, F: forecast

2.1.3 Planned Investments for 2021-2025 period

The planned investments by OEDAŞ approved for Energy Markets Regulation Board for 2021-2025 period total to an amount of 3,174 billion TL. Investments are mostly related to distribution network as presented in the table below.

Approved Investments for 2021-2025 Period

Type of Investments	Total
Grid Investments	2.600.685.180 TL
Investments Required by Law	412.252.900 TL
Grid Operating Investments	130.034.260 TL
R&D Projects Expansion Investments	5.183.670 TL
Other Investments that Qualify as Investment	26.006.850 TL
Total Planned Investment Amounts	3.174.162.865 TL

*Amounts are presented in Turkish Lira based on CPI as of October 2020 (487,38)

Based on the information provided, the following table presents a breakdown of network investments for the 2021-2025 period to improve operation performance of OEDAŞ.

Breakdown of Network Investments (2021-2025)

	2021	2022	2023	2024	2025	Total
Transformer Capacity (kVA)	298.654	317.452	337.479	357.276	377.431	1.688.293
O VERHEADLINES (km.) - Transmission	893,43	942,93	995,67	1.047,73	1.100,65	4.980,42
O VERHEADLINES (km.)	694	725	755	788	820	3.782,00
CABLE (km)	1905	1931	1956	1983	2010	9.785,00

2.2 Potential Social Impacts of the Project

Social impact analysis for the project was realised based on Procedure on Identification of Environmental and Social Risks. Potential social impacts and related risks were identified.

These risks are followed one by one by relevant departments within a QDMS software, Environmental and Social Impacts Assessment Module. These risks are summarised below as distributed within related impact area and provision of expectation of realisation and mitigation/management measures. When new impacts and risks are identified and risks in QDMS software is evaluated this part will be updated.

Impact Area	Affected Stakeholders	Risks	Impact Magnitude/ Realisation Possibility	Mitigation Management Measures
Land Acquisition and Livelihoods	Land owners, Leasers, informal users, people doing land-based economic activities: agriculture and animal husbandry	<ul style="list-style-type: none"> • Loss of only livelihood resource of land owners • Possible grievance of land owners after land acquisition (Non-payment or late payment of compensations) 	Low /Low	<ul style="list-style-type: none"> • Keeping land acquisition to minimum and priority preference of public lands • Land Acquisition Procedure and leaflet, identification of land owners during project development and pre-acquisition information meetings • Information provision, support and consultancy on rights and legal issues (in order to prevent late payments)
		<ul style="list-style-type: none"> • Late access to information by land owners • Lack of identification of vulnerable groups 	Medium/ Medium	<ul style="list-style-type: none"> • Pre-acquisition information meetings for land owners and distribution of printed information • Sending written information to local authorities • Identification of vulnerable groups during pre-acquisition meetings and taking note in meeting minutes
Labour Conditions	Workforce	<ul style="list-style-type: none"> • Non-compliance with legislation and standards on workplace conditions and labour rights • Forced labour, child labour and other labour problems in contractors and supply chain 	Medium/ Medium	<ul style="list-style-type: none"> • Human Resources Policy • Discipline Procedure and code of conduct

Impact Area	Affected Stakeholders	Risks	Impact Magnitude/ Realisation Possibility	Mitigation Management Measures
		<ul style="list-style-type: none"> • Violation of women rights, mobbing and harassment • Disturbing behaviours of workers with regards to external stakeholders 	Medium/ Medium	<ul style="list-style-type: none"> • Improve and strengthen the content of gender equality program in rural communities • Include gender equality and prevention of gender-based violence and harassment issues in contractors' training • Clarify and strengthen gender equality commitments in contractor control processes i.e., contracts • Diversify and enhance social media awareness raising share on gender equality with prevention of violence and harassment issue • Support and promote awareness raising through arts and cultural activities as well as raising gender equality awareness ambassadors.
Labor Conditions	Workforce	<ul style="list-style-type: none"> • Lack of access to grievance mechanism, late response to complaints or lack of response • Overlook of complaints related to contractors 	Medium/ High	<ul style="list-style-type: none"> • Information on grievance mechanism in information brochures • Placement of complaint call center numbers in construction site sign boards and concealing boards • Priorisation of muhtars (village managers) in complaint call centre • Availability of complaint forms in field teams and vehicles • Assessment of complaints about contractors within field controls and forms
Impacts of investments, projects and construction	Communities affected from investment and projects, clients, general public	<ul style="list-style-type: none"> • Dust, noise and disturbing activities • Creation of H&S risks due to traffic and fast drive of vehicles • Grievance of public and businesses by unplanned cuts during maintenance and operation activities • Unauthorised entry in transformers, climbing up poles and creating H&S risks • Disturbing behaviours of workers i.e. harassment, mobbing and social disturbance 	Low/High	<ul style="list-style-type: none"> • Environmental and Social Risks Management Plan • H&S Processes and management plans • Ethics Rules • Discipline Regulation • Complaints Mechanism • Internal and External Audits

Impact Area	Affected Stakeholders	Risks	Impact Magnitude/ Realisation Possibility	Mitigation Management Measures
	Communities affected from projects and investments	<ul style="list-style-type: none"> • Harm on lands, crops or animals of land owners 	Low/High	<ul style="list-style-type: none"> • Awareness raising and training construction of contractors • Identification of harms with the participation of representatives of agricultural directorates and provision of compensation
Community Health and Safety	Communities affected from investment and projects, clients, general public	<ul style="list-style-type: none"> • Emergency Conditions • Security risks and management • Project related health and safety risks • Traffic accidents 	Medium/ Medium/ Medium/ Medium	<ul style="list-style-type: none"> • Emergency preparedness and response action plan and emergency risk assessment procedure • Security policy and providing relevant training to security personnel • Assessment project-related risks related to public health and safety and taking necessary actions • Implement of road safety policy, practices, and procedures.
Information Disclosure and Stakeholder Engagement	All stakeholders	<ul style="list-style-type: none"> • Presence of unidentified stakeholders 	Low/ Medium	<ul style="list-style-type: none"> • Stakeholder Engagement Plan and Updates of the plan
	All stakeholders	<ul style="list-style-type: none"> • Lack of access to information, lack of information on investment plans, stakeholder engagement plan, grievance mechanism, social responsibility programs and reports. Lack of information on general about risks and impacts. 	High/High	<ul style="list-style-type: none"> • website • (http://www.osmangaziedas.com.tr/) • Media communications (newspapers, radio and TV) • Social Media • SMS • Brochures • Written information sent to governorships and local authorities; • Visits to and meetings with municipalities and muhtars, • Prioritisation of muhtars in call centre
	Subscribers with health issues	<ul style="list-style-type: none"> • Electricity cuts of subscribers who are dependent on machines working on electricity 	Not identifiable/High	<ul style="list-style-type: none"> • Identification of these kind of subscribers in the system and prevention of cuts • Announcement from web site and with brochures, information provided to muhtars
	Clients and general public	<ul style="list-style-type: none"> • Not knowing where to complaint, lack of access to grievance mechanism, problems 	Medium/high	<ul style="list-style-type: none"> • Grievance Mechanism • Customer Satisfaction Standard Certification-ISO 10002

Impact Area	Affected Stakeholders	Risks	Impact Magnitude/ Realisation Possibility	Mitigation Management Measures
		in recording complaints, lack of response in time and lack of response, closure of complaint without resolution and similar risks.		<ul style="list-style-type: none"> • Stakeholder Engagement Plan • Trainings • Brochures • Web site and social media • Availability of complaint forms local offices and field vehicles
	Internal Stakeholders- Employees	<ul style="list-style-type: none"> • Non-compliance with legislation and standards on workplace conditions and labour rights, • Violation of women rights, mobbing and harassment • Disturbing behaviours of workers with regards to external stakeholders • Forced labour, child labour and other labour problems in contractors and supply chain 	Medium/ High	<ul style="list-style-type: none"> • Human Resources Policy • Discipline Procedure and code of conduct • Grievance Mechanism • Internal and External Audits • Trainings

3. NATIONAL REGULATORY AND INTERNATIONAL REQUIREMENTS

Turkish Environmental Impact Assessment (EIA) Regulation (Official Gazette Date/Number: 25.11.2014/29186) includes provisions for environmental impact assessment, public consultation and disclosure of project information for projects listed in annexes of the regulation. Electricity distribution lines and relevant facilities are not covered under the annexes of the Turkish EIA Regulation; hence, OEDAŞ operations are not subject to national EIA requirements.

Although not subject to national ESIA requirements, due to international financing and as best industry practice, OEDAŞ will ensure that the Project will comply with the requirements of EBRD Environmental and Social Policy (April 2019) and IFC Environmental and Social Sustainability Policy (January 2012). According to best practice and the EBRD and IFC performance requirements, OEDAŞ is offering consultation opportunities for stakeholders as described in the following sections. OEDAŞ will appropriately engage such stakeholders on environmental and social issues that could potentially affect them through a process of information disclosure and meaningful consultation, on an ongoing basis during project implementation.

As OEDAŞ, we strive to fulfil our responsibilities towards the environment, the public and customers in our service region. Our primary goal is to ensure quality and continuous services, with due respect to the environment and by protection of health and safety of our workers, clients and communities affected from project activities. As such, we will be developing a Quality Management System (QMS) that covers procedures, instructions and other relevant documents related to environmental and social issues. The QMS and related documentation are currently in preparation by following the provisions of ISO 9000, ISO 14001 and OHSAS45001 management system standards.

4. STAKEHOLDER IDENTIFICATION

4.1 Introduction

For the purposes of this plan, a stakeholder is defined as any individual, organization or group who is potentially affected 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 affected (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.

Priority stakeholders identified for the Project are outlined in sections 4.2 to 4.8. Stakeholders that may potentially be impacted due to future construction/operation related works of OEDAŞ are considered to include the following:

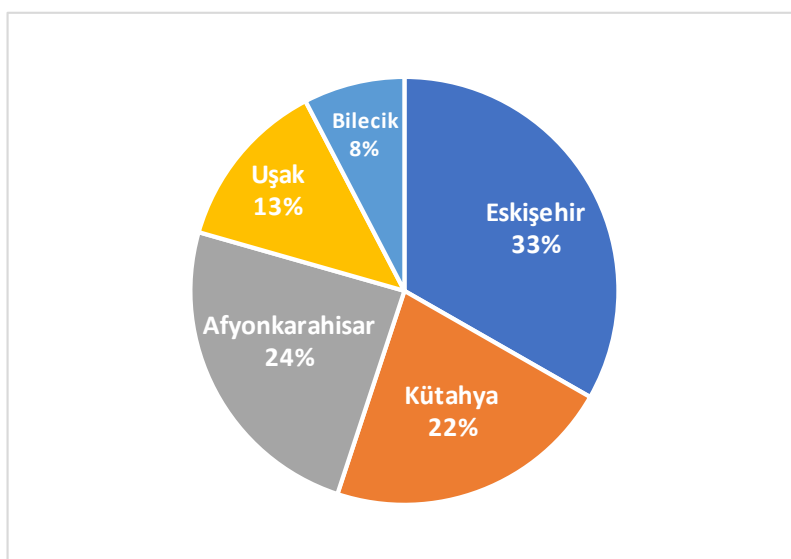
- Customers (including households, commercial businesses and industrial facilities);
- Landowners/users;
- Local communities located in five regions within the operation area (Eskisehir, Afyon, Kutahya, Bilecik, Usak);
- Employees;
- Sub-contractors (repair and maintenance, connection/disconnection in electrical installations, meter reading operations, cleaning services, security services, call center, construction, cleaning, security, etc.) and suppliers;
- Governmental organizations including ministries (e.g. Ministry of Energy and Natural Resources, Ministry of Environment and Urban Planning, Ministry of Labor and Social Security) and affiliated public institutions (e.g. OEDAŞ);
- Local authorities located in five provinces within our operation area;
- Non-governmental organizations (e.g. ELDER, Chambers of Electrical Engineers/ Chambers of Electrical Technicians);
- Local and national media; and
- General Public.

The stakeholder list will be updated regularly to include any new stakeholders identified. If you are not in the provided lists and would like to be informed about the project please contact OEDAŞ at numbers provided in the last page of this SEP document.

4.2 Customers (including Vulnerable Groups)

Customers (about 1,9 million service beneficiaries) are among the most important stakeholders for the Project in relation to electricity distribution operations particularly in terms of quality and efficiency of services provided by OEDAŞ. Service beneficiaries include local residents, commercial businesses/industries, and eligible customers.

OEDAŞ serves a total population of nearly 2.79 million spread out in five provinces. Distribution of served population as in subscribers numbers by provinces is presented below:



Provinces	No. of Subscribers
Eskişehir	635.042
Kutahya	416.204
Afyon	464.913
Usak	246.779
Bilecik	146.036

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). OEDAŞ will identify the vulnerable directly affected landowners/users prior to construction of each project and will develop measures to ensure they are not disadvantaged due to land acquisition/construction and operation of the activities undertaken by OEDAŞ.

4.3 Neighbouring Communities and Facilities (including Vulnerable Groups)

Neighbouring communities and facilities to OEDAŞ facilities are among the important stakeholders both in relation to operational activities (particularly related to repair and maintenance activities in the vicinity of settlements and sensitive receptors) and future construction activities (mainly in terms of impacts on local residents and businesses related to physical or economic displacement).

Physical investments in 2021 are planned to be undertaken in the districts listed below. Details of each planned project are presented in Annex A.

Provinces	Districts
Eskişehir	Alpu, Çifteler, Günyüzü, Han, İnönü, Mahmudiye, Centre, Mihalgazi, Odunpazarı, Sarıcakaya, Seyitgazi, Sivrihisar, Tepebaşı
Afyon	Bayat, Bolvadin, Dazkırı, Dinar, Emirdağ, Evciler, İhsaniye, Centre, Sultandağı, Şuhut
Kutahya	Aslanapa, Dumlupınar, Emet, Gediz, Hisarcık, Centre, Pazarlar, Simav, Tavşanlı
Bilecik	Bozüyük, Gölpazarı, İnhisar, Centre, Osmaneli, Pazaryeri, Söğüt, Yenipazar
Uşak	Eşme, Karahallı, Centre, Sivasslı, Söğüt, Ulubey

4.4 Landowners/users (including Vulnerable Groups)

The Project may require some permanent acquisition of private land and/or use rights purchase, which will require agreements with applicable land owners/users. OEDAŞ will inform and consult the affected land owners/users regarding the land acquisition and compensation procedures, legal rights and land use restrictions during the construction and operation phases through written notifications, community leaflets, posters, newsletters, and face-to-face meetings. Additionally, grievance mechanism and complaint access details will be provided during these meetings so that affected communities will benefit from grievance mechanism. Directly affected landowners/users will be identified during

preparation of the expropriation plan for the period 2021-2025. In order to minimize expropriation needs, OEDAŞ will take all necessary measures to avoid physical resettlement in future investment projects and will consider, to the extent possible, public areas (such as roads, streets, parks, squares, etc.) for distribution network routings.

Among the land owners/users, potential vulnerable groups will be given priority as stakeholders and their access to project information disclosure should be ensured. Such groups may include women, disabled people and certain disadvantaged groups (including illiterate people, elder people, people with special needs, land users without official title deeds and similar). These people will be identified during pre-acquisition information meetings and information will be provided. They will also be supported and provided assistance/counseling if they have special needs.

4.5 Employees

The employees of the company will be affected by the Project and associated changes in operations including changes in workload, shifts and similar. No retrenchment or workforce expansion is planned within the scope of the Project. A total number of 1.238 permanent staff are currently employed under OEDAŞ, of which 143 women are employed representing approximately 11,6% of the total workforce. OEDAŞ is committed to be in compliance with the Turkish Employment Laws and EBRD PR2/IFC PS2 requirements on labor and working conditions.

Employees will be informed about the grievance mechanism during recruitment and at all stages of the Project. To this end, meetings with worker representatives will be held to inform the employees about the grievance mechanism. Trainings and toolbox talks will also be conducted to familiarize the employees about mechanism of internal grievance. Face to face meetings will be held with each employee if required. Employee satisfaction surveys will be conducted to be able to get feedback on the grievance mechanism and necessary actions will be taken to improve the mechanism.

4.6 Contractors and Suppliers

Sub-contractors and suppliers of OEDAŞ constitute important stakeholders for both existing operations and Project related activities. OEDAŞ engages with several full-time subcontractors including repair and maintenance, connection/disconnection in electrical installations, meter reading operations, cleaning services, security services, call center, construction works (both above- and underground facilities). In average, a total of 208 full-time subcontractor employees work per month in OEDAŞ operations. We are committed to subcontracting of local workforce from the OEDAŞ regions, which is regarded as a positive social impact of the Project. Our subcontractors collect job applications through their websites/human resources pages and through info mail applications. Also they contact local İŞKUR offices who pass local job seekers in their region. Suppliers of equipment and associated services and other suppliers of services (such as maintenance of fire systems) are also considered as stakeholders of the Project.

Subcontractor employees will be informed about the grievance mechanism at all stages of the Project. To this end, trainings and toolbox talks will be conducted to familiarize the contractor employees about mechanism of internal grievance. Face to face meetings will be held if required. Regular annual employee standard reviews will be carried out by OEDAŞ. Complaints of stakeholders related to the activities of contractors will be handled within OEDAŞ's grievance management system. General complaint venues are disclosed in information disclosure activities; in addition call center details are available in sign boards of construction sites or construction area concealing covers. Additionally, OEDAŞ carries out awareness raising and training activities as well as filed control and monitoring activities in order to manage grievances of stakeholders related to contractors effectively.

4.7 Governmental Organizations

Governmental agencies can be grouped as national, provincial, district and local (i.e. neighbourhood) levels. These organizations include authorities with statutory responsibilities relevant to the Project or to environmental or social issues, and other bodies responsible for providing infrastructure relevant to the Project. A list of governmental agencies relevant to the Project has been prepared as presented below:

GOVERNMENTAL BODIES		
Level	Organization	Relation to the Project
National	Ministry of Energy and Natural Resources (MENR)	MENR has regulatory functions such as determining energy targets and policies and ensuring production and consumption of energy in accordance with these targets and policies.
	The Grand National Assembly of Turkey (TBMM/Parliament)	TBMM is the sole body given the legislative prerogatives by the Turkish Constitution on behalf of the Turkish nation and this right is inalienable.
	TEDAS (Turkish Electricity Distribution Inc.)	TEDAS is a key stakeholder, since the ownership of distribution assets and the new assets arising from investments rests with TEDAS as per the 'Transfer of Operating Rights Agreement' signed with this state-owned organization. The TEDAS General Directorate undertakes the necessary expropriations and obtains right-of way for distribution network routings. This organization also provides occupational trainings and relevant certifications.
	TEIAS (Turkish Electricity Transmission Inc.)	TEIAS has been activated on 01.10.2001 so as to take over the all transmission facilities in the country and to carry out the planning of load dispatch and operation services.
	TETAS (Turkish Electricity Contracting and Trading Co.)	TETAS is responsible for the wholesale distribution of electricity in Turkey, as well as importing and exporting additional electricity resources.
	EMRA (Energy Market Regulatory Authority)	Distribution licenses to regional electricity distribution companies are granted by EMRA. The authority also determines electricity tariffs, ensures service quality and approves investment plans and expropriation requests of distribution companies.
	Ministry of Environment and Urban Planning (MEUP), General Directorate of EIA, Permits and Audits	MEUP has regulatory functions such as environmental impact assessment permits and environmental permitting. MEUP may have views on future investments in relation to EIA regulation.
	MEUP, General Directorate of Environmental Management	
	MEUP, General Directorate of Spatial Planning	
	Ministry of Labor and Social Security (MoLSS), General Directorate of Occupational Health and Safety	MoLSS have specific policies and regulations on labor and working conditions, and occupational health and safety. They will be engaged during recruitment of employees and regularly on work permits, Social security and insurance payments etc. The MoLSS may conduct audits on labor and working conditions.
	MoLSS, General Directorate of Labor	
	MoLSS, Social Security	
Provincial	ISKUR (Labor Institution of Turkey)	Governorships are the highest authorities in provinces representing national government. Complaints and requests by the public regarding electricity distribution services that are received by Prime Ministry Communications Centers (BIMER) are being directed to OEDAŞ.
	Eskisehir, Afyon, Usak, Kutahya and Bilecik Governorships	

GOVERNMENTAL BODIES		
Level	Organization	Relation to the Project
	Eskisehir, Afyon, Usak, Kutahya and Bilecik Municipalities	The municipality and its relevant departments (including AYKOME - Infrastructure Coordination Center) have responsibilities including issuing of permits and licenses of infrastructure works and traffic planning as well as the required fees. In addition, complaints and requests by the public regarding electricity distribution services that are received by Public Relations Departments of municipalities are being directed to OEDAŞ.
	Eskisehir, Afyon, Usak, Kutahya and Bilecik Municipalities, Departments of	In case of fire, fire brigade is the responsible body to respond.
	Eskisehir, Afyon, Usak, Kutahya and Bilecik Provincial/Operational Directorates of Forestry	Directorates of Forestry have regulatory functions such as permitting related to forest crossings and may also have views on future construction activities.
	1 st Regional Directorates of Highways	This organization has regulatory functions such as permitting related to highway crossings and may also have views on future construction activities.
	Eskisehir, Afyon, Usak, Kutahya and Bilecik Provincial Directorates of Environment and Urbanization (PDEU)	PDEUP has regulatory functions such as environmental impact assessment permits and other environmental permitting. PDEU may have views on future construction activities.
	Eskisehir, Afyon, Usak, Kutahya and Bilecik Provincial Directorates of Disaster and Emergency Management	These organizations have a function to manage and respond to emergency cases.
	Eskisehir, Afyon, Usak, Kutahya and Bilecik Provincial Directorates of Security (Police)	In case of crime related issues, police perform necessary actions.
	Eskisehir, Afyon, Usak, Kutahya and Bilecik Provincial Directorates of Health Services	In case of adverse health issues, 112 emergency medical services are informed.
	Eskisehir, Afyon, Usak, Kutahya and Bilecik Provincial Directorates of Culture and Tourism	This organization may provide specific views related to archaeological potential of future construction areas.
District/ Local	Local governorships	Local municipalities and governorships and their relevant associated bodies may be important in case of emergency cases. In addition, these authorities together with the headmen of the neighborhoods in the vicinity of future construction areas may have specific views about the activities.
	Local municipalities	
	Muhtars (i.e. village heads) in the vicinity of operation areas and future construction areas	

4.8 Non-Governmental Organizations (NGOs)

A list of key NGOs that may have interest in the Project has been prepared as given below:

NON-GOVERNMENTAL BODIES		
Level	Organization	Relation to the Project
National	Association of Distribution System Operators (ELDER)	This association may have views in relation to future investments and may also provide support on stakeholder consultation activities.
	Association for the Protection of Consumers (TÜKODER)	This association may have views in relation to service quality and electricity billing issues.

NON-GOVERNMENTAL BODIES		
Level	Organization	Relation to the Project
Provincial	Chambers of Electrical Engineers (EMO) (Eskişehir, Bilecik and Kütahya Offices)	These chambers may provide provincial-specific and/or site-specific views related to future construction and operation activities.
	Chambers of Electrical Technicians (Eskişehir, Bilecik, Afyon and Kütahya Offices)	
	Chambers of Industry (Eskişehir, Bilecik and Kütahya Offices)	
	Universities	Collaboration on Equal Opportunities.
NGO	Federation of Animal Rights (HAYTAP)	Social Responsibility Projects.
	Mother and Child Training Foundation (AÇEV)	Training Collaboration.
	Dartışsafaka Community	Social Responsibility Projects.
	Foundation on Women Handcrafts (KEDV)	
	Koruncuk Foundation	
	Cerebral Palsy Association	

5. PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

OEDAŞ has mechanisms for stakeholder engagement, information disclosure and grievance management. Stakeholder engagement activities undertaken by OEDAŞ is explained below according to different categories of stakeholders:

Customer Relations

OEDAŞ has Customer Relations Departments, managing customer relations of the companies. Communication with customers is carried out through the forms available in OEDAŞ' company websites and the call center (i.e. 'ALO 186'). Grievances from customers are also received by phone, e-mail or letter. There is one common call center of OEDAŞ, which is being operated by an external contractor company with 200 employees. The call center operates 24 hours, 7 days a week.

Depending on the issue, any complaints addressed to the Head Office or Regional Office will be first reviewed by the management and conveyed to the relevant department within OEDAŞ to be resolved. Should a complaint require a visit to site, OEDAŞ technical personnel plans a trip to investigate the matter, if possible resolves the problem, if not immediately informs the complainant with a correspondence stating the method and duration that the problem will be resolved according to governing law within 15 to 20 days.

In addition to the call center, website, by phone, e-mail and letter, it is possible for the consumers to submit views and grievances to a national system called BIMER-Prime Ministry Communication Center and the EMRA (Energy Market Regulatory Board). Legally, responds to all views and grievances should be made in a maximum of 15 days.

A database of the grievances received through different channels and government channels will be established and analyzed to better facilitate customers and to improve the quality of the services and operation provided by OEDAŞ.

Land Owners

Engagement of land owners and affected stakeholders is managed by Land acquisition and CBS departments in line with Land Acquisition Procedure.

Local Authorities

OEDAŞ participates in activities organised by local authorities and takes on board requests and complaints in order to resolve. These relations are managed by authorised personnel in provincial offices.

Employees

Human Resources department manages internal grievance mechanism and issues related to workplace conditions and labour rights. Contractors also commit to compliance with regards to legal duties and sectoral standards in this area.

Public Institutions

Meetings are held, written information is shared and visits are paid to Energy and National Resources Ministry, Ministry of Environment and Urbanisation, Work and Social Security Ministry and all other relevant public institutions. All official correspondences are recorded in a software.

NGOs

OEDAŞ works not only to provide electricity but also respond to the social needs of society that its a part of as a stakeholder. Within this context, OEDAŞ collaborates with national and local NGOs.

Corporate Communications

OEDAŞ discloses announcements and corporate reports through the company websites and press releases. Additionally, regular meetings are conducted by OEDAŞ with media organizations and public authorities. OEDAŞ is a member of the Electrical Distribution Services Association (ELDER). Information disclosure activities are conducted by ELDER regarding high electricity prices and electricity losses include public service/information announcements (TV-radio), press releases, press meetings, lobbying activities and meetings with regulatory authorities.

6. STAKEHOLDER ENGAGEMENT PROGRAMME

This section provides an overview of the proposed stakeholder engagement approach for existing electricity distribution operations and future construction activities. The main communication methods and mechanisms that have been and/or will be used by OEDAŞ to consult with key stakeholders are summarized in the table below:

Stakeholder Engagement Programme

Stakeholder Type	Content of Information to be Disclosed	Engagement Tool(s)	Time Frame
Customers (Local residents and commercial businesses/ industries – including vulnerable groups)	Project information and service/operation updates Investment Plans Planned Cut, Maintenance Announcements	<ul style="list-style-type: none"> Website (http://www.osmangaziedas.com.tr/) Media announcements (including newspapers, radio and TV) Social Media SMS Handouts Written notifications of governorships and related administrations prior to investment works, who will then inform relevant customers 	Pre-construction, Construction, Operation
	Grievance mechanism	<ul style="list-style-type: none"> Comment/complaint forms available at OEDAŞ administration offices, website, face-to-face meetings Telephone E-mail Mail BIMER (complaint mechanism through state authorities) Applications to EMRA or through other local authorities such as Muhtars (i.e. village heads) and municipalities Information on Access to information and complaints venues is available at: https://www.osmangaziedas.com.tr/basvuru-surecleri 	Pre-construction, Construction, Operation
Neighbouring communities and facilities that may be affected by the Project (Including vulnerable people)	Project information and updates, particularly any activities likely to cause particular disturbance to the nearby neighbourhoods (such as traffic disruption, dust/noise generation, land acquisition and livelihood impacts, Community Health and Safety, land use restrictions etc.)	<ul style="list-style-type: none"> Website (http://www.osmangaziedas.com.tr/) Media announcements (including newspapers, radio and TV) Community brochures/handouts and posters at appropriate locations at the directly affected settlements prior to construction, renovation or maintenance works in settlement areas Face-to-face meetings at each affected community (at least 10 days before) Written notifications of local authorities prior to investment works, who will then inform communities that may be affected (at least 30 days before) 	Pre-construction, Construction, Operation
	Grievance mechanism	<ul style="list-style-type: none"> Comment/complaint forms available at OEDAŞ administration offices, website, face-to-face meetings Grievance forms will be disseminated to the project affected people prior to land acquisition and construction activities 	Pre-construction, Construction, Operation

Stakeholder Type	Content of Information to be Disclosed	Engagement Tool(s)	Time Frame
		<ul style="list-style-type: none"> Complain boxes and community information boards will be set up in projects' affected settlements. Telephone E-mail Mail 	
Landowners/ Users (Including vulnerable groups)	Project information and updates, particularly any activities requiring physical or economic displacement, compensation process, legal rights of landowners/users etc.	<ul style="list-style-type: none"> Written notifications to affected people Community leaflets Posters/information boards Face-to-face consultation meetings Negotiation meetings and mutual agreements/protocols signed with affected people 	Pre-construction, Construction, Operation
	Public grievance mechanism	<ul style="list-style-type: none"> Comment/complaint forms available at OEDAŞ administration offices, project sites, website, and will be distributed to the affected people during face-to-face meetings Telephone E-mail Mail 	Pre-construction, Construction, Operation
Company employees	Project updates and changes in operations	<ul style="list-style-type: none"> Face-to-face meetings Trainings Tool box Employee satisfaction surveys, regular employee standards reviews Employee grievance mechanism Meetings with workers' organizations and workers' representatives. 	Pre-construction, Construction, Operation
	Internal employee grievance mechanism	<p>Contact supervisors or appointed OEDAŞ personnel by:</p> <ul style="list-style-type: none"> face-to-face communication telephone e-mail comment boxes 	Pre-construction, Construction, Operation
Contractors and suppliers	Project updates and changes in operations	<ul style="list-style-type: none"> Face-to-face meetings Regular H&S employee standards review for contractor employees Trainings Tool box Employee grievance mechanism 	Pre-construction, Construction, Operation
	Internal grievance mechanism	<ul style="list-style-type: none"> Audits conducted by personnel or consultants appointed OEDAŞ face-to-face communication telephone e-mail use of OEDAŞ grievance mechanism by contractors 	Pre-construction, Construction, Operation
Worker Organizations/ Unions	Internal employee grievance mechanism	<ul style="list-style-type: none"> Face-to-face meetings Telephone E-mail Mail Employee grievance mechanism Periodical meetings with the union representatives 	Pre-construction, Construction, Operation

Stakeholder Type	Content of Information to be Disclosed	Engagement Tool(s)	Time Frame
Governmental organizations	Project information and updates	<ul style="list-style-type: none"> Face-to-face meetings On-going communication with relevant regulatory stakeholders related to permitting, emergencies, etc. Written notifications of local authorities prior to investment works 	Pre-construction, Construction, Operation (face-to-face meetings at least semi-annually)
Non-governmental organizations	Project information and updates	<ul style="list-style-type: none"> Website (http://www.osmangaziedas.com.tr/) Media announcements Periodical press releases Face-to-face meetings On-going communication with relevant stakeholders 	Pre-construction, Construction, Operation (face-to-face meetings at least semi-annually)

Stakeholder engagement is a continuous process that should be monitored and updated as necessary according to the needs of new activities in order to maintain constructive relationships with the customers, local communities and other stakeholders. The company website will be updated annually to include information on Project related activities and any changes in environmental policy, plans and procedures that are followed. All comments and grievances will be managed in accordance with the Grievance Mechanism of OEDAŞ as described in Chapter 7.

The exact dates/times and venues of public meetings, pre-acquisition information meetings will be announced through the company website (<http://www.osmangaziedas.com.tr/>), media announcements, and brochures/handouts/posters and written notifications of local authorities who will then inform communities. There is a total of 157 tentative network investment projects planned for 2021 in five regions. Details of each planned project are presented in Annex A.

Information on investments for 2021 planned

AFYON		ESKİŞEHİR		KÜTAHYA		UŞAK	
Bölge	Proje Sayısı	Bölge	Proje	Bölge	Proje Sayısı	Bölge	Proje
BAYAT	1	ALPU	5	ASLANAPA	3	EŞME	2
BOLVADİN	1	ÇİFTELER	1	DUMLUPINA	1	KARAHYA	4
DAZKIRI	1	GÜNYÜZÜ	7	EMET	2	KET	2
DİNAR	3	HAN	1	GEDİZ	4	MERKEZ	2
EMİRDAĞ	2	İNÖNÜ	1	HİSARCIK	1	SİVASLI	1
EVCİLER	2	KET	2	KET	2	SÖĞÜT	1
İHSANİYE	2	MAHMUDİY	1	MERKEZ	6	ULUBEY	2
KET	3	MİHALGAZİ	1	PAZARLAR	1		
MERKEZ	7	MİHALLIÇCI	3	SİMAV	8		
ŞULTANDA	1	ODUNPAZAR	8	TAVŞANLI	4		
ŞUHUT	2	SARICAKAY	1				
		SEYİTGAZİ	2				
		SİVRİHİSAR	4				
		TEPEBAŞI	1				

BİLECİK	
Bölge	Proje
BOZUYU	9
GOLPAZA	12
İNHİSAR	2
KET	2
MERKEZ	9
OSMANE	5
PAZARYE	4
SÖĞÜT	2
YENİPAZ	3

7. GRIEVANCE MECHANISM

Existing Customer Grievance Mechanisms of OEDAŞ:

As noted above, OEDAŞ manages public grievances and comments through its grievance evaluation and resolution procedure. The main characteristics of the available customer grievance mechanism are as follows:

- As described in Chapter 5 above, communication with customers is carried out through the contact forms available in the company website (<http://www.osmangaziedas.com.tr/>) and the call center ('ALO 186'). Please note that ALO 186 is subject to tariff costs.
- Submitted grievances are first recorded and reviewed by the OEDAŞ Head Office and Regional Office Management. The management then directs the grievance to the relevant department of the company for evaluation and resolution, and informs the customer based on the feedback he/she receives from the department.
- Maximum response/ complaint resolution period to customers' grievances is 15-20 days, in accordance with timetables provided by regulations and penalties are applied in case of exceeding the response period.
- In addition, it is possible for the public to submit views and grievances to a national system called BIMER-Prime Ministry Communication Center. Views and grievances can be submitted through BIMER website, telephone, mail or in person. According to Turkish legislation on access to information (Law No: 4982), responses to all information requests and grievances should be made in a maximum of 15 working days by the company to the relevant authority where the complaint is raised.
- All submitted grievances and demands are recorded by OEDAŞ and assessed fairly and appropriately in accordance with the company's internal procedures.

Grievance Mechanism Developed for the Project:

OEDAŞ will maintain its existing customer grievance mechanism described above for construction and operation activities.

The complaints of stakeholders related to contractors are handled and resolved within grievance mechanism of OEDAŞ. Complaint application venues are disclosed within regular information disclosure activities (web page, social media, etc.) For the management of construction related complaints, grievance mechanism contact details are available on the sign boards of construction sites. Additional announcements will be made via brochures and posters which will be made available in communal areas. Telephone numbers of muhtars are registered in call centre's data base in order to provide VIP service to muhtars. Additionally OEDAŞ is raising awareness among contractors and training their staff as well as conducting field control and monitoring activities in order to manage contractor related complaints effectively. This will ensure that all comments, suggestions and complaints received from the stakeholders especially from landowners/users and local communities that are mostly affected by the future investments are dealt with appropriately and in a timely manner. **All grievances will be acknowledged within 5 working days; responded to within 15 working days and closed out no later than a total of 20 working days.** If a longer term programme is required to provide an adequate solution then this programme will be detailed on the register against the specific grievance and complainant will be informed about the new schedule for complaint resolution.

Local communities will be informed about the grievance mechanism during the consultation and disclosure activities which will take place prior to and during construction and through the company

website, (this SEP which is on public domain at the website), and community leaflets, handouts, posters that will be distributed in each affected village/settlement.

OEDAŞ welcomes any comments or any other enquiries on the commitments within this document or the Project in general. OEDAŞ is committed to an open and fully formalized approach to management of any grievances in relation to the Project and related construction activities. Stakeholders may use the existing communication system described above to submit their comments/grievances related to the Project (i.e. company websites, call center, Customer Care Department). See the contact details on the last page of this SEP.

An overview of grievance handling process is described below:

1. All concerns, complaints or comments related to the existing operations and/or future investment activities of OEDAŞ can be submitted in writing, by email, by telephone or in person at offices (See the contact details on the last page of this SEP). Grievances may be submitted using the 'Comment/Grievance Form' presented in Annex B. Individuals who submit grievances have the right to request that their name be kept confidential.
2. All verbal and written grievances submitted by the stakeholders will be considered. Verbal grievances will be written on grievance forms by the responsible person as defined below.
3. All grievances will be registered in a grievance log to ensure that each grievance is assigned an individual number and that consistent tracking and corrective actions are carried out. The grievance log will contain:
 - Date of submission of the grievance;
 - Reference number;
 - Contact details of the complainant;
 - Content of the grievance;
 - Identification of parties responsible for the resolution;
 - Dates when the investigation was initiated and completed;
 - Findings of the investigation;
 - Proposed corrective action;
 - Date of response sent to the complainant (unless it is anonymous);
 - Statement of satisfaction of the complainant;
 - Date of closing out the grievance; and
 - Any outstanding actions for non-closed grievances.
4. The grievance will be evaluated by OEDAŞ Head Office and Regional Office Management with the assistance of relevant line management in order to identify what actions need to be taken, and an appropriate response will be developed.
5. All grievances will be acknowledged within 5 working days; responded to within 15 working days and closed out no later than a total of 20 working days. The complainant will be contacted through telephone or face-to-face meeting, if needed to confirm that the proposed corrective action taken is satisfactory, and the complainant's response will be recorded in the grievance log.
6. The grievance will be closed out by signing the complaint close out form and the close out date will be recorded in the grievance log. If the complainant is not satisfied with the action taken, further assessment and re-evaluation of the grievance will be undertaken by a higher organizational level within OEDAŞ. The complainant will be informed about the progress on a regular basis.
7. Any grievances related to subcontractors' activities will be managed in line with the mechanism described here.

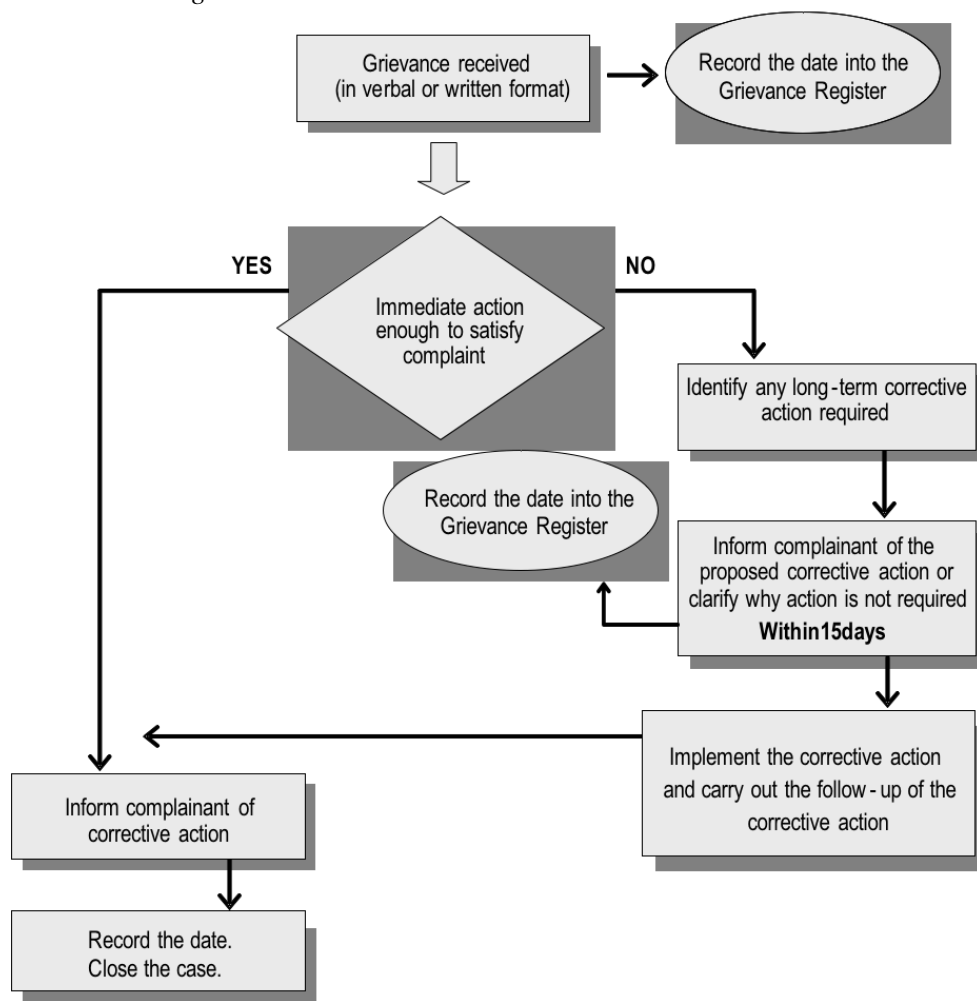
8. All grievances will be recorded and assessed on regular basis to ensure successful close out of all grievances. In case of failures in closure of complaints by the contractors/subcontractors in agreed time, the complainant will be informed about the estimated closing date and will be provided an update about the findings thus far.
9. If grievance evaluation team identifies the received complaint is invalid, it will be rejected while informing the complainant of the decision and their entitlement to seek internal review.

In addition to grievances, comments will be reviewed once a week to identify if they require a response. Comments will be reflected to a comment log that will include information on the date of the comment submission, details of the person submitting the comment, issue of comment, response required or not, and date of response.

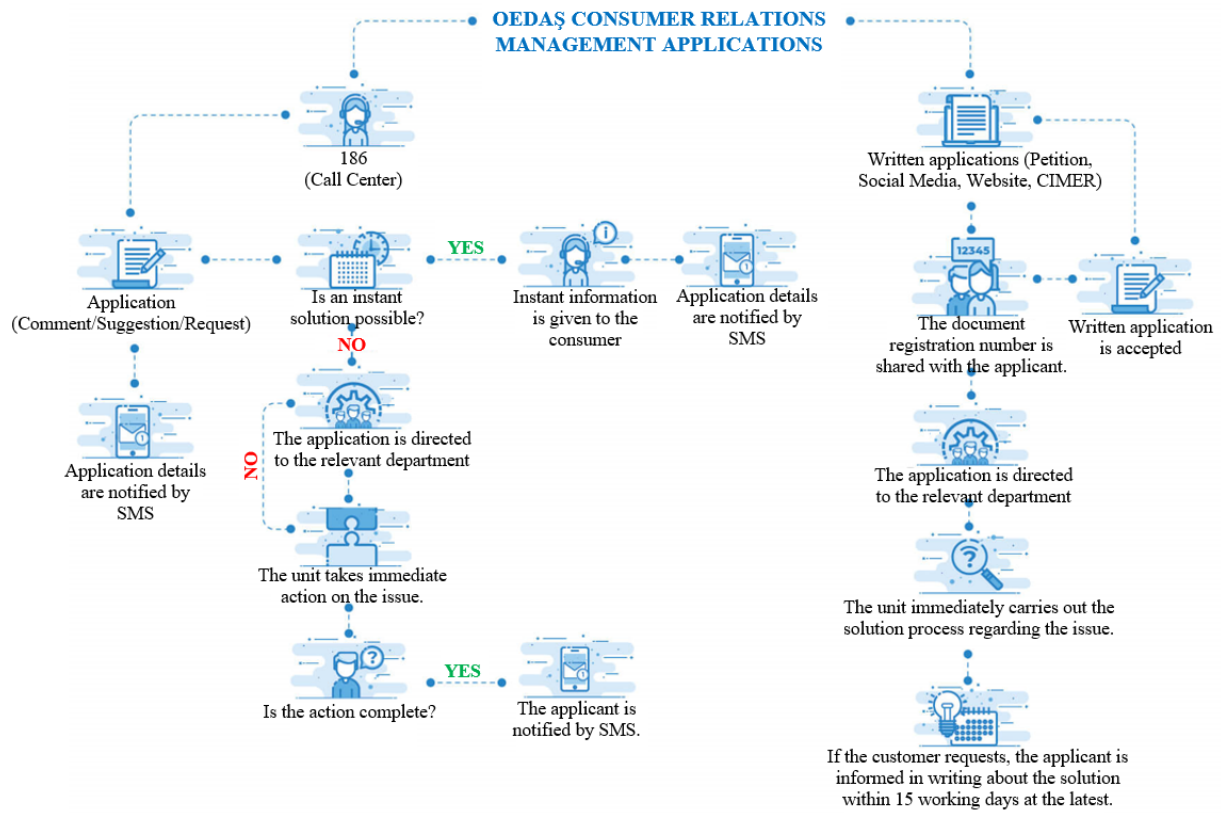
All grievances, comments, feedback and all stakeholder engagement activities (i.e. consultation meetings, community health and safety trainings, social investment activities etc.) will be reported on the project website on regular basis. The progress on the implementation of the SEP and implementation of the grievance procedure will also be provided to EBRD and IFC as part of annual Environmental and Social Monitoring Report.

The grievance procedure is presented with a grievance flow chart as given below. Request and process chart is also provided below.

Grievance Management Procedure



Request Process Chart



8. RESOURCES AND RESPONSIBILITIES

The implementation of this SEP will be conducted and monitored by OEDAŞ “Osmangazi Elektrik Dağıtım A.Ş.” Units responsible of implementation of this SEP, along with their main roles include the following:

Unit	Roles/Responsibilities
Corporate Communications Department – Responsible department on general implementation of SEP.	<ul style="list-style-type: none"> • Management of the public grievance mechanism related to Project activities as described in Chapter 7 above. • Management of construction contractor’s performance on stakeholder engagement and grievance management. • Follow-up and coordination with other departments who are responsible for engagement activities, production of information disclosure tools and distribution etc. • Coordination of engagement of muhtars on general information disclosure and engagement activities as well as projects • Follow up update of SEP and coordinate overall reporting of SEP.
Distribution Services	<ul style="list-style-type: none"> • Handling of customer relations, complaints and applications.
Corporate Communications Department	<ul style="list-style-type: none"> • Organization of public meetings, management of media relations and announcements, website announcements and updates. • Production of documentation, brochures and posters to be used in information disclosure and engagement activities and distribution of these to relevant operating departments.
Investments Department/Land Acquisition Department	<ul style="list-style-type: none"> • Notifications of governorships/related administrations and local authorities prior to investment works, distribution of informative brochures/handouts and posters at appropriate locations prior to investment works in settlement areas. • Conducting information meetings in affected settlements, identification and record of vulnerable groups, distribution of brochures and other printed material. Record and reporting of these activities.
Legal Affairs Department	<ul style="list-style-type: none"> • Management of relations with regulatory stakeholders related to permitting, emergencies, etc.
Quality Environmental Health Safety Department	<ul style="list-style-type: none"> • Handling of environmental and quality related issues with respect to the planned investments and ensuring that community concerns are addressed.
Human Resources Department	<ul style="list-style-type: none"> • Management of internal grievance mechanism.

9. REPORTING

All comments and complaints received will be recorded in a comment log and grievance log, respectively. Implementation of SEP shall be reported by Corporate Communication department annually in line with the programme explained in 6.1. and shared with the wider public and communities through the website.

10. COMPANY CONTACT DETAILS

The contact details for submitting grievances to OEDAŞ and contacting its units are provided below:

OEDAŞ “Osmangazi Elektrik Dağıtım A.Ş.”
BÜYÜKDERE MAHALLESİ ATATÜRK BULVARI NO:239/A
ODUNPAZARI / ESKİŞEHİR

E-mail: info@oedas.com.tr

Telephone (Customer Care Department and other departments listed above):

+90 222 211 60 00

Telephone (Customer Call Center): ‘ALO 186’

Fax: +90 222 230 15 53

Website: <http://www.osmangaziedas.com.tr>

ANNEX A

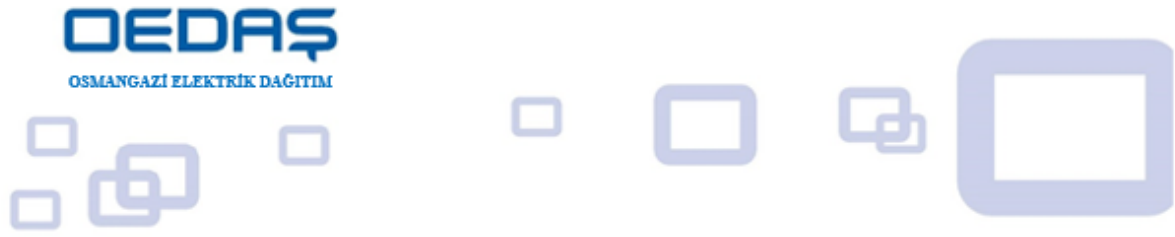
List of Planned Investments for 2021

Province	District	Project Number	Project Cost (TL) CPI October 2020 : 487,38
Afyonkarahisar	BAYAT	1	278.417,63
	BOLVADIN	1	11.786.940,86
	DAZKIRI	1	409.790,38
	DINAR	3	1.571.467,95
	EMIRDAĞ	2	3.012.453,60
	EVCİLER	2	7.391.028,38
	İHSANİYE	2	766.259,11
	KET	3	14.394.883,52
	CENTRE	7	69.006.883,74
	SULTANDAĞI	1	664.575,11
	ŞUHUT	2	9.512.300,60
Bilecik	BOZÜYÜK	9	9.916.172,83
	GÖLPAZARI	12	7.441.764,84
	İNHİSAR	2	1.117.967,29
	KET	2	10.241.141,24
	CENTRE	9	20.229.021,23
	OSMANELİ	5	4.807.502,17
	PAZARYERİ	4	14.090.136,69
	SÖĞÜT	2	8.978.661,45
	YENİPAZAR	3	1.017.442,34
Eskişehir	ALPU	5	3.877.793,69
	ÇİFTELER	1	1.214.787,74
	GÜNYÜZÜ	7	7.339.234,37
	HAN	1	351.371,72
	İNÖNÜ	1	2.539.755,01
	KET	2	18.486.973,31
	MAHMUDIYE	1	7.725.505,89
	MİHALGAZİ	1	2.939.456,43
	MİHALLIÇCIK	3	2.152.979,28
	ODUNPAZARI	8	53.348.046,94
	SARICAKAYA	1	2.667.625,75
	SEYİTGAZİ	2	12.656.923,41
	SİVRİHİSAR	4	2.771.267,65
	TEPEBAŞI	1	1.136.119,52
Kütahya	ASLANAPA	3	2.447.205,55
	DUMLUPINAR	1	1.479.764,37
	EMET	2	1.331.227,03
	GEDİZ	4	22.607.761,08
	HİSARCIK	1	550.133,06
	KET	2	13.636.963,39
	MERKEZ	6	55.388.396,58

Province	District	Project Number	Project Cost (TL) CPI October 2020 : 487,38
	PAZARLAR	1	576.203,72
	SİMAV	8	11.709.808,34
	TAVŞANLI	4	2.173.416,08
Uşak	EŞME	2	4.269.213,22
	KARAHALLI	4	29.691.755,69
	KET	2	9.833.353,43
	MERKEZ	2	5.956.004,58
	SİVASLI	1	22.165.040,26
	SÖĞÜT	1	5.387.683,34
	ULUBEY	2	6.878.678,62

ANNEX B

Comment/Complaint Form



CONTACT FORM

We wish you a nice day...

For what reason are you submitting the petition?

☐ Acknowledgment ☐ Request ☐ Complaint ☐ Notice

Applicant's

Name, Surname / Title

T.R. Identity / Tax No

Subscriber number

Address

Telephone

Email

How would you like your application to be responded to?

☐ Email ☐ Telephone ☐ Written ☐ I'm not waiting for your return

Your personal data is processed within the scope of the "Personal Data Protection and Processing Policy" adopted by our company pursuant to the Personal Data Protection Law 6698, and you can access the Clarification Text on the subject from the annex in the form or at www.osmangaziedas.com.tr

S14.KLT.F520/Rev.4-31.8.2020

Application Titles Counter		
<input type="checkbox"/> Not regularly read	<input type="checkbox"/> Defective/Replacement/Request for Review	
<input type="checkbox"/> Seal	<input type="checkbox"/> Reverse Connection	<input type="checkbox"/> Other _____
Lighting		
<input type="checkbox"/> Street lights are not working	<input type="checkbox"/> Lamp missing	
<input type="checkbox"/> New lighting facility	<input type="checkbox"/> Other _____	
Leakage		
<input type="checkbox"/> Leakage notification	<input type="checkbox"/> Installation	<input type="checkbox"/> Objection
Energy Pole and Line		
<input type="checkbox"/> Taking the energy pole or line to the appropriate distance		
<input type="checkbox"/> Removing the pole/line within the space I own		
Occupational Health and Safety and Environment		
<input type="checkbox"/> Occupational health and safety notifications _____		
<input type="checkbox"/> Environmental notifications (waste, oil spill, noise, etc.) _____		
Other		
<input type="checkbox"/> Voltage low / high	<input type="checkbox"/> Power increase/decrease	<input type="checkbox"/> Temporary admission
<input type="checkbox"/> Environmental notices	<input type="checkbox"/> Occupational health and safety notifications	
<input type="checkbox"/> Other _____		
Required documents		
• Title deed for taking the energy pole or line to the appropriate distance		
• Photocopy of ID and title deed for removing the pole or line in the owned area		
If you have any explanation regarding your request, please write it in the section below		
<div style="border: 1px solid black; height: 150px; width: 100%;"></div>		
Date / /	Signature <div style="border: 1px solid black; width: 150px; height: 50px; display: inline-block; vertical-align: middle;"></div>	