THE REPUBLIC OF TÜRKİYE

TÜRKİYE SINAİ KALKINMA BANKASI

STAKEHOLDER ENGAGEMENT PLAN

FOR TÜRKİYE GREEN FINANCE PROJECT

Final

14.07.2026

Revision Record

Revision	Date	Description
1	July 2023	Draft Stakeholder Engagement Plan
2	September 2023	Final Stakeholder Engagement Plan
3	July 2026	Updated Stakeholder Engagement Plan

Table of Content

List of Tables

List of Figures

1. Introduction

The primary project development objective is to support the greening of firms through equity financing and mobilized private capital which will be achieved by providing accessible and affordable long-term financing fund. Türkiye Green Finance Project Venture Capital Investment Fund (hereinafter referred to as "TGF" and "Project") is capitalized by the collaboration of IBRD and TSKB. The initial size of Project is estimated at US$155 million in the first phase, with the IBRD contribution at most half of that. One of the mandatory documents to be prepared for Project is the Stakeholder Engagement Plan (SEP) which has been prepared in accordance with the relevant national legislation, the Environmental and Social Standard (ESS) 1 and 10 of the World Bank Environmental and Social Framework (ESF) and the relevant Good International Industry Practice (GIIP).

1.1. Context

TGF's objective is to support investments in innovative greening firms, i.e., firms that are already green or genuinely decarbonizing, and promote greening of the private equity industry through establishing a demonstration green fund in Türkiye. The Fund has a double bottom line mandate, with non-concessional returns and sustainable impact maximization. Support for the establishment of TGF should be considered as a pilot project aimed at (i) proving commercial viability and crowding in private capital for green private equity investments, (ii) scaling up the private equity industry and therewith contributing to lowering high corporate leverage and diversifying the financial sector, and (iii) ultimately creating a market for the private sector to take over eventually. As such, TGF lends itself to explore opportunities for collaboration with IFC and other IFIs and DFIs, in addition to institutional and private investors, who may be interested in partly supporting capitalization of such a fund or in making co-investment with the fund at deal level or sub-fund level.

The Project aims to support (i) firms' decarbonization and investments in green technologies, (ii) development of the Private Equity (PE) industry through a demonstration green fund, (iii) financial sector diversification and development of firms' access to diversified sources of long-term finance, (iv) lowering high corporate leverage, and (v) accelerate financing for the green transition and enhanced climate action.

The idea is to pioneer green private equity investments and encourage local corporate green debt market development, therewith enhancing local green and climate investment capacity and creating markets for private players so that the private sector can take over eventually. By doing so, the project will ultimately support the transition to a low-carbon and climate-resilient economy, contribute to financial sector diversification and support the development of domestic sources of long-term finance and capital markets.

TSKB is a borrower and implementing entity for IBRD funds, with a sovereign guarantee, and uses those funds to inject capital into TGF (Figure 1). The reason for choosing TSKB as the implementing entity for TGF is that the sponsor (founder) of TGF needs to have strong credibility in the market. A direct government investment would be suboptimal as the PE (Private Equity) Fund would be perceived as government controlled. TSKB has the highest credibility in the market and the strongest implementation capacity out of all potential options.

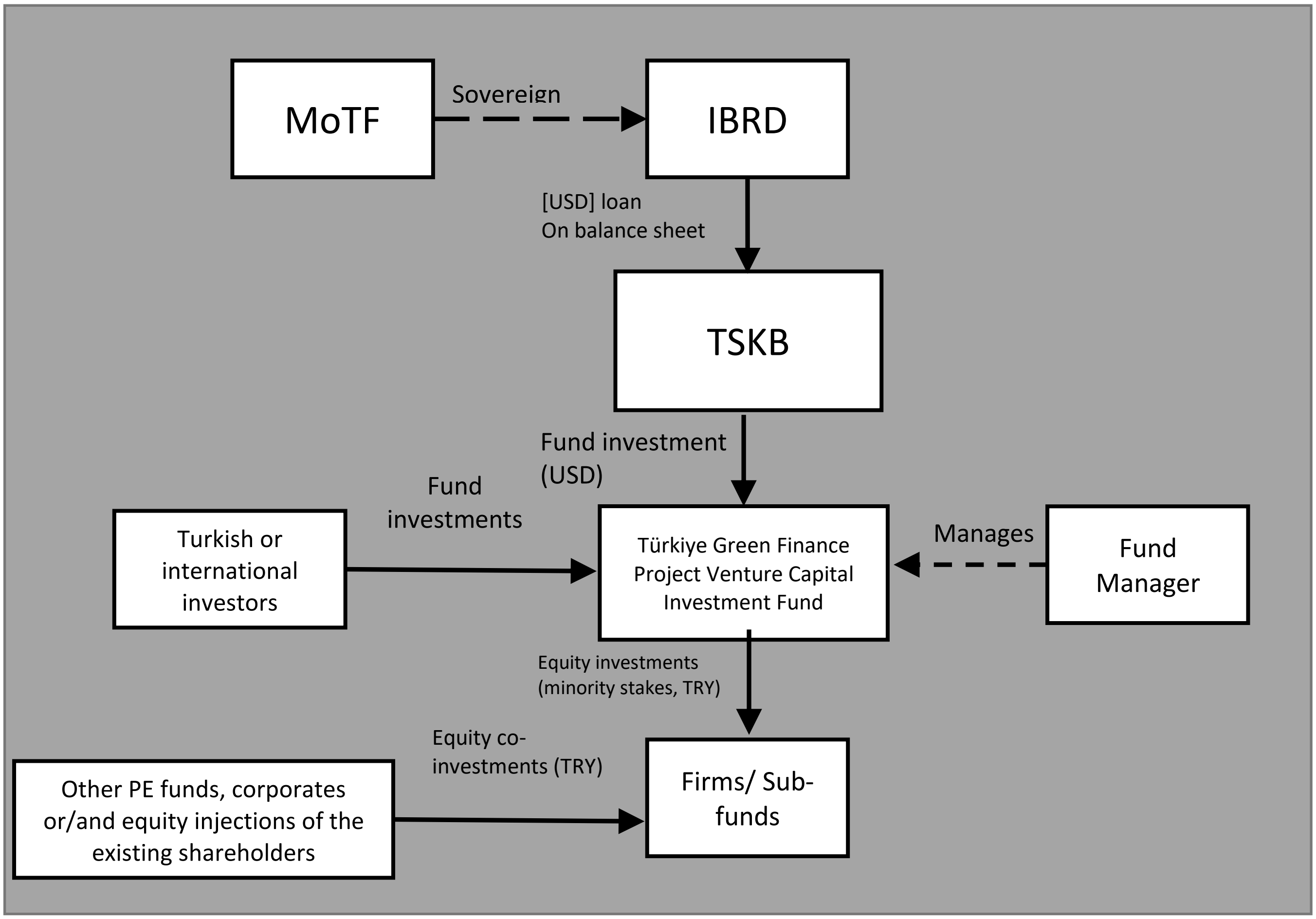

Figure 1 Indicative Fund Structure

1.2. Project Description

TGF proposes to finance and support green and/or greening firms through equity financing and mobilized private capital. Companies that are adopted systematic green investment strategies to align with the basis of Turkish Green Taxonomy expected to be entered into force in the upcoming years will be considered eligible as investee enterprise.

More specifically Green and Greening Firms can be defined as follows;

Green (Greentech) firms refer to any enterprise or project based SPVs established to develop or invest in activities that contribute to low energy intensity production, reduction in GHG emissions by developing renewable energy PPs or decreasing utilization of non-renewable sources, circular economy practices to reduce their or their stakeholders' natural resource utilization, reduction in air, soil and water pollution and more efficient and sustainable use of natural resources.

Green firms' activities can be listed as follows;

- **Generation of renewable energy sources**, including onshore and offshore wind power plants, utility-scale and decentralized solar photovoltaic (PV) plants, hybrid solutions (e.g., floating solar, combined solar and wind), biogas or biomass, and associated technology solutions such as battery energy storage systems (BESS),

- **Climate Industries,** manufacturing activities that contribute to the supply of goods and services that align with the country's CM and CA goals. Eligible industries may include, among other, e-mobility (e.g., electric vehicle charging infrastructure and manufacturing), RES technology (e.g., solar panel, inverters, trackers, wind turbines, BESS), grid technologies (e.g., smart meters, smart grids), clean hydrogen, low carbon technologies, low-carbon footprint food producers (e.g., products with lower footprints that can be substitutional to the high carbon footprint foods etc.

- **Circular economy adopted companies,** applying production technologies and processes to substantially contribute to the elimination of waste and pollution and facilitate recirculation of products and materials at their highest value and producing eco-efficient products to substantially contribute to the regeneration of nature, including companies reusing their own waste and/or other sector company wastes, water-efficient fixture manufacturers, high energy electric motors producers, etc.

- **Green Service Companies**, Consulting services, Project operation management, Project evaluation, audit, and verification, Monitoring and testing services, Technical product certification and promotion including ESCOs, RESCOs, waste management companies, etc. Green-tech companies reducing the emissions by giving services along with the digital platforms including shared vehicle companies, sharing economy companies etc.,

Greening firms refer to any company in any sector which have/plan to have concrete decarbonization plans, environmentally and socially sustainable practices to increase their competitiveness and maintain their growth potential. These firms can either be high GHG emitters or adopters of industrial good practices in order to compete and extend their market. These companies' policies and investments will support them to decarbonize their activities, mitigate and adapt to climate change impacts, implement circular economy practices and address environmental issues. Furthermore, through this approach, they can cope with physical and transitional risks easily.

Greening firms may include but not limited to:

- Energy efficiency at facility level**,** that shall be demonstrated by the comparison of product specific energy consumption values with the national and/or international sector values. National and/or internationally known green building certifications for the construction and tourism sector companies.
- Industrial companies which already measure emissions in compliance with ISO 14064 and/or have solid plans to set targets such as utilizing renewable energy sources to reduce scope 2 emissions, developing decarbonization plans to decrease scope-1 emissions.
- Companies having high water-intensity processes that assess water footprint through ISO 14046 or relevant standards and intend to promote resource efficiency and adaptation of circular economy principles.
- Enterprises producing environmental benefits, decreasing environmental costs, improving management capacity through establishment of ISO-based management system, and reducing environmental risks for the purpose of improving corporate environmental performance.
- Companies with ambitious targets to label their products with green product labels such as Environmental Product Declaration (EPD), The Product Environmental Footprint (PEF), EU Ecolabel, the Blue Angel, etc.

1.2.1. About TSKB

TSKB is Türkiye's privately-owned investment and development bank, with a strong focus on sustainable development objectives. The bank was established in 1950 with the support of the World Bank and the Central Bank of Türkiye and commercial banks. TSKB supports Türkiye's sustainable growth with a broad array of corporate banking, investment banking, and advisory services provided to the customers as first- and second-tier lender. TSKB focuses on creating value for the inclusive and sustainable development of Türkiye through its financing and consultancy solutions. TSKB started its sustainability journey in 1980s with environmental factors being integrated in loan evaluation processes. In the 1990s, the first environmental loan was offered to the industry and in the 2000s, TSKB started project financing in the field of renewable energy. In the environment and renewable energy sectors, the bank ranks as number one in terms of number of projects financed in Türkiye. It is also the leading bank in Türkiye in promoting new initiatives for scaling up green finance as well as in establishing governance arrangements and developing methodologies for climate-related and environmental risks.

TSKB is majority-owned by Isbank Group. TSKB is 51.4 percent owned by Türkiye Is Bankasi A.S. Group, 8.4 percent by Türkiye Vakiflar Bankasi T.A.O, with the remainder owned by other institutions and individuals quoted in Borsa Istanbul. TSKB is the 12th largest bank and the largest development bank by shareholders equity in Türkiye as of 2022Q3. The loans-to-assets ratio stood at 69.7 percent at 2020Q3. Total assets grew by 29 percent in the first 9 months of 2022 from TL 84.1 billion to TL 108.3 billion (USD 5.9 billion), with loan growth at 18 percent (8.9 percent decline in FX-adjusted terms). TSKB only lends to private companies. The loan portfolio distribution by leading sector includes electricity generation (42.7 percent – of which 93 percent renewable), financial institutions (8.2 percent), energy distribution (5.6 percent), tourism (5.5 percent), metal and machinery (7 percent).

As a privately-owned development and investment bank, TSKB has a unique status in Türkiye's financial system. TSKB is fully wholesale funded and does not have a deposit-taking license. TSKB funds its operations through IFIs funding, external loans, and capital market transactions. TSKB has been providing investment loans and funding projects in areas of strategic importance to the authorities, although the bank has been diversifying its operations. Most of its borrowings are in foreign currency, matching its loan book, and borrowings are predominantly long-term. Fitch Ratings affirmed the rating of TSKB as BB- and the rating outlook as Stable in June 2026. In addition, TSKB is listed on Borsa Istanbul, with a market value reaching US$706 million on 6 July 2026.

TSKB is a market leader for green/ sustainable finance in Türkiye, with the share of SDG-linked loans close to 93 percent of total loans. TSKB adopted a Sustainability Policy in 2012 (updated in 2022), a Climate Change Mitigation and Adaptation Policy in 2021, and integrated climate-related and environmental considerations into its governance arrangements. Under the policies, TSKB committed to consider mitigation and adaptation to climate change in all its activities and internal operations. TSKB aims to have more than 90 percent share of SDG-linked loans and a 60 percent share of climate and environment-focused SDG-linked loans in the total portfolio by 2025. For its direct impact, TSKB aims to reduce its scope 1 emissions by 42 percent by 2030, and by 63 percent by 2035. On the governance side, TSKB's organizational structure for sustainability involves the Board of Directors and the Executive Committee and comprises of all employees. The Board of Directors guides the Bank's operations in line with the adopted sustainability strategy. All sustainability work, including coordination of the activities and business plans, is conducted by two main pillars. First, the Sustainability Committee, established in 2014, consists of four Board Members as well as the CEO and three Executive Vice Presidents. The second pillar is the Sustainability Management Committee, chaired by the CEO and led by three Executive Vice Presidents with the head of working groups from various departments that are responsible for rolling out sustainability activities throughout the bank. TSKB also plays an active role in national and international initiatives in the field of sustainability (e.g., UNEP FI, UN Global Compact, Global Reporting Initiative, International Development Finance Club, Konya Climate Council, etc.).

TSKB monitors its green portfolio and provides disclosures in line with TCFD. TSKB's sustainability reporting practice started in 2009 and evolved into integrated reporting in 2016. Since 2018, TSKB illustrates its strategy, targets, performance, value creation scheme and impacts driven by its operations via its Integrated Annual Reports. TSKB uses its own taxonomy, with 11 sectors identified for the purpose of loan-tagging and reporting. TSKB identifies impacts and manages risks from own operations via the ISO 14001 Environmental Management System certification. Environmental and social impacts from its lending operations are managed using 'TSKB Environmental and Social Risk Evaluation Tool' (ERET). ERET is an evaluation model that rates projects on the basis of five criteria under 35 separate headings, including evaluation of physical and transition risks that have been developed by end-2023. The greenhouse gas emissions and energy and resource efficiency dimensions of the financed projects are also taken into consideration. The results of such evaluations are taken into account in the project assessment, financing, and investment monitoring processes. Customers then take measures to prevent or mitigate environmental and social impacts considered to be negative and draft an Environmental and Social Action Plan when necessary. TSKB is among the Best Banks in the Global Arena with an ESG Risk Rating of "Negligible Level". Continuing to raise the bar with its Environmental, Social and Governance (ESG) performance every year, TSKB improved its ESG risk rating from to 7.4 according Sustainalytics ESG Rating assessment. With this rating, TSKB ranked 9th among global development banks, 11th in the global banking sector, and 43rd among approximately 14 thousand institutions evaluated by Sustainalytics. Ahead of COP31, TSKB continues to reinforce its leadership in sustainable finance and responsible communication and aims to actively contribute to discussions on climate finance, transition planning, sustainable infrastructure, nature and biodiversity, and social inclusion. Through its participation in COP31-related events and stakeholder engagement activities, TSKB will continue to share its experience and support the advancement of Türkiye's sustainable development and net zero transition agenda.

TSKB has been reporting its climate-related performance within the framework of the Carbon Disclosure Project (CDP) since 2010 and has continuously improved its disclosure and management practices over the years. The Bank received the Climate Change Leadership Award from CDP Türkiye in 2013 and 2015, maintained a "B" score from 2016 onwards, and improved its Climate Change score to "A-" in 2022 through ambitious targets and decisive actions on carbon emissions.

In 2024, TSKB expanded its CDP reporting scope beyond climate change and reported for the first time under the Water Security and Forests modules. Building on this progress, in the 2025 CDP assessment TSKB achieved global A List status in both the Climate Change and Water Security modules, while maintaining its "B" score in the Forests module. With its strong performance, TSKB continues to rank among the leading banks in Türkiye and demonstrates its commitment to managing climate- and nature-related risks and opportunities in line with international best practices.

The first green/sustainable bond in Türkiye was issued by TSKB in 2016. TSKB issued three green/sustainable bonds for the total amount of US$1.05 billion. The first green/sustainable bond issuance was in 2016 for US$300 million, followed by a sustainable subordinated bond issuance in 2017 and another sustainable bond issuance in 2021. Funds obtained through bonds are used to finance green and social projects in line with the Sustainable Finance Framework. TSKB submits an Allocation and Impact Reporting to its investors annually to provide them with an insight into the impacts of the projects financed through the funds from the bond issuances. In addition, TSKB funding includes syndicated loans tied to ESG rating and sustainability performance criteria.

1.2.2 About Maxis Private Equity Portfolio Management A.Ş.

Maxis Private Equity Portfolio Management A.Ş. ("Maxis") was established in 2017 under the Capital Markets Board of Türkiye ("CMBT "). As part of Isbank Group, Maxis has become a leading venture capital and private equity investment firm with its experienced investment team. Assets under Management ("AuM") of Maxis has reached approximately US$575 million with 19 funds in its portfolio. Maxis provides professional investor relations management to more than 329 reputable investors, including institutional, individual and Türkiye İş Bankası group companies. In virtue of the experience gained by Isbank Group's private equity activities, Maxis team has an outstanding reputation and close relations in the Turkish business community and amongst DFIs operating in Türkiye. Besides, TSKB has been in a reliable collaboration with the experienced and coherent investment team of Maxis. Considering Maxis's experience regarding private equity activities and diversified investment areas (impact investing, green, women entrepreneurs, technology, RE etc.) which are in line with the TGF's mission and target areas, Maxis has been awarded as fund manager partner of TGF together with TSKB.

1.2.3. About Fund Management

TGF is the first Green Private Equity Fund in Türkiye. It is also a customized Private Equity Fund through its unique scope and targeted impact. IBRD is counting on TSKB for the establishment and origination of TGF and also for the repayment of the associated loan, therefore TSKB has to also undertake the role of General Partner (GP) of the Fund and have a control on the selection and management of the investee enterprises. Maxis leads legal process of establishment of the Fund and support TSKB in management of the Fund. As a result, an Investment Committee, where duties have been defined for members who works proactively from TSKB and Maxis have been established to manage the Fund.

TSKB and Maxis have the following responsibilities with the mentioned scopes for these stages stated.

- Origination: Mainly TSKB creates the pipeline and assesses the target companies with the support of Maxis.
- Execution: Mainly Maxis performs investment and shareholder negotiations, due diligence studies, shareholder agreements, competition authority applications, closing and other related activities with the support of TSKB.
- Management: Mainly TSKB, holding a board membership, monitors and supports portfolio companies and conducts other related management activities with the support of Maxis.
- Exit: Mainly Maxis screens exit opportunities, perform exit negotiations and execute exit procedures with the support of TSKB.

1.2.3.1. Purpose and Scope of SEP

The overall purpose of this SEP is to ensure that a consistent, comprehensive, and coordinated approach is taken to stakeholder engagement and information disclosure throughout the Project. It is further intended to demonstrate the commitment of the TSKB and Maxis, as main implementing parties of TGF, to an 'international best practice' approach to engagement.

In line with current international best practice, this SEP aims to ensure that stakeholder engagement is conducted on the basis of timely, accurate, and accessible information. In this way, the SEP seeks to ensure that honest relationship is built between the Fund and investors and green and greening companies are supported by the introduction in green markets. The main objectives of the development and implementation of the SEP for the Project are outlined below:

- Identify relevant stakeholders and categorize individuals or organizations that may affect and also be affected by the Project.
- Defining the engagement responsibilities of TSKB, Maxis and investee enterprises at different stages.
- Distribute accurate Project information in an open and transparent manner. Information should allow affected parties to develop an understanding of the potential impacts, risks and benefits of the Fund. The point of effective engagement is not simply to relay information to affected stakeholders but engage them in a communication process that will identify their interests, expectations, concerns and fears.
- Develop relationships of trust between the Fund and stakeholders to contribute to proactive interactions and avoid where possible, unnecessary conflicts based on rumor and misinformation.
- Record and address received concerns, issues, and suggestions to allow the rationale for investment decisions to be traced and understood.
- Identify the most effective tools, methods, timing, and structures through which to share project information, and to ensure regular, accessible, transparent, and appropriate consultation.
- Define reporting and monitoring measures to ensure the effectiveness of the SEP and periodical reviews of the SEP based on findings.

This SEP has been prepared only for Fund management. Stakeholder engagement activities for investee enterprises and their sub-projects will be defined in the project-specific SEP which will be developed and applied during the Project.

Mentioned sub-projects' SEPs shall be clear and concise and focus on describing the sub-project and identifying its stakeholders. It is key to identify what information will be in the public domain, in what languages, and where it will be located. It should explain the opportunities for public consultation, provide a deadline for comments, and explain how people will be notified of new information or opportunities for comments. It should explain how comments will be assessed and taken into account. The SEP also needs to take into account special provisions for any disadvantaged and vulnerable groups. It should also describe the sub-project's grievance mechanism and how to access this mechanism. The SEP should also commit to releasing routine information on the sub-project's environmental and social performance, including opportunities for consultation and how grievances will be managed.

Key SEP objectives and activities expected from sub-project SEP are given below:

SEP Objectives:

- Identify relevant stakeholders,
- Familiarize the stakeholders with the Project,
- Fulfill national and international requirements for consultation,
- Record and address stakeholder concerns, issues and suggestions.

SEP Activities:

- Develop and implement and regularly update SEP,
- Maintain regular engagement with stakeholders,
- Develop, disseminate, and implement grievance management procedure,
- Maintaining ongoing relationship with Project workers and NGOs,
- Regular reporting to stakeholders.

This SEP is a “living” document that is regularly reviewed based on the results of stakeholder engagement activities carried out by the Project. Similarly, as new stakeholders are identified, the list of stakeholders will also be updated by TSKB. The Stakeholder Engagement Program is adapted to the Project evolution and reflected any significant change in the Project design or execution. When (i) more details become available on stakeholder preferred means of engagement; (ii) more resources are needed for implementing this SEP; (iii) responsibilities for implementation of this SEP change or are delegate; and (iv) new stakeholders are identified for the Project, this SEP needs to be updated.

This SEP is intended to cover the broad range of engagement activities required for the TGF and is going to be supported by the following documents:

- Environmental and Social Commitment Plan

- Environmental and Social Management System Manual

2. Regulations and Requirements

2.1. National Legislation

2.1.1 Constitution of Republic of Türkiye

Stakeholder engagement is secured by the Constitution of the Republic of Türkiye. The Constitution contains provisions that ensure that people can freely express their views.

Article 10 of the Constitution of the Republic of Türkiye is the article “Equality before the law". According to this article, “Everyone is equal before the law regardless of distinction as to language, race, color, sex, political opinion, philosophical belief, religion or any similar reasons. Men and women have equal rights which are the obligation to be ensured exist in practice by the government. Measures taken for this purpose shall not be interpreted as contrary to the principle of equality.”

Article 25 of the Constitution of the Republic of Türkiye is the article "Freedom of thought and opinion". According to this article, “Everyone has the freedom of thought and opinion. No one shall be compelled to reveal his/her thoughts and opinions for any reason or purpose; nor shall anyone be blamed or accused because of his/her thoughts and opinions.”

As emphasized by the "Freedom to Explain and Spread Thought (**Article 26** of the Constitution of the Republic of Türkiye)"; everyone has the right to express and disseminate their thoughts and opinions individually or collectively by word, text, picture or other means. This article also covers the freedom to receive or impart information or ideas without the intervention of the official authorities.

At the same time, everyone has the "Right of petition, Right to Information and Appeal to the Ombudsperson” (**Article 74** of the Constitution of the Republic of Türkiye). Accordingly, ““Citizens and foreigners resident in Türkiye, with the condition of observing the principle of reciprocity, have the right to apply in writing to the competent authorities and to the Grand National Assembly of Türkiye with regard to the requests and complaints concerning themselves or the public. The result of the application concerning himself/herself shall be made known to the petitioner in writing without delay. Everyone has the right to obtain information and appeal to the Ombudsperson. The Institution of the Ombudsperson established under the Grand National Assembly of Türkiye examines complaints on the functioning of the administration1.”

2.1.2 Law No. 4982 - Law on the Right to Information, Official Gazette No. 25269 (24.10.2003)

Law on the Right to Information No.4982 (Official Gazette dated 24.10.2003 and numbered 25269) defines the process concerning the right to information. The purpose of this law is to regulate the procedure and basis of the right to information in accordance with the principles of equality, impartiality and openness, which are the requirements of a democratic and transparent government. According to the obligation to provide information (Article5), institutions and organizations are required to take necessary administrative and technical measures for all kinds of information and documents, considering the exceptions set out in this law, to provide information to applicants; and to evaluate and decide on applications promptly, effectively and correctly.

2.1.3 The Law on Use of the Right to Petition

Citizens of the Turkish Republic are entitled to apply Turkish Grand National Assembly and the public authorities by written petition, in respect to their requests and complaints, in accordance with the Article 3 of the Law on Use of the Right to Petition (Official Gazette dated 01.11.1984 and numbered 3071). On the condition of reciprocity and using Turkish language in their petitions, foreigners residing in Türkiye are entitled to enjoy this right.

2.1.4 The Environmental Impact Assessment Regulation, Official Gazette No. 31907 (29.07.2022)

Article 9 - Public consultation and participation meeting:

"1) In order to inform the investing public, to get their opinions and suggestions regarding the project; Public Participation Meeting will be accomplished on the date given by Ministry and Ministry qualification given institution / organization and project owners as well as the participants of the project affected community will be expected to attend in a central location determined by the Governor.

a) The competency issued institutions / organizations by the Ministry will publish the meeting date, time and place through widely published newspaper at least ten (10) calendar days before the determined date for the PPM.

b) Public Participation meeting will be held under the Director of Environment or through Urbanization or authorized chairman. The meeting will inform the public regarding the project, receive views, questions and suggestions. The Director may seek written opinions from the participants. Minutes of meeting will be sent to Ministry, with one copy kept for the Governorship records.

2) Governorship will announce the schedule and contact information regarding for the public opinion and suggestions. Comments received from the public will be submitted to Commission as per the schedule.

3) Members of Commission may review the Project implementation area before the scoping process, also may attend to public participation meeting on the date announced.

4) The competency issued institutions / organizations by the Ministry could provide studies as brochures, surveys and seminars or through internet in order to inform the public before the Public Participation Meeting."

2.1.5 Participatory Planning Approach in Türkiye

Within the context of the **Public Financial Management and Control Law No. 5018**, under the heading of "Strategic planning and performance-based budgeting" it is stated that:

"**Article 9**- Public administrations; They prepare a strategic plan with participatory methods in order to create their future missions and visions within the framework of development plans, programs, relevant legislation and the basic principles they adopt, to determine strategic goals and measurable targets, to measure their performance in line with the predetermined indicators, and to monitor and evaluate this process."

Moreover, **Strategy and Budget Department of the Presidency** prepares and shares manuals on guidelines for the strategic planning process that public administrations have to implement. One of these guides is about the **principles of participation.** The principles of participation document are a best practice guide for those who design, implement and manage participatory work. The Ministry of Industry and Technology acts under the guidance of these guides in large-scale projects and works that require corporate strategic planning and participation.

2.2 International Legislation for Stakeholder Engagement

2.2.1 Human Rights

The Universal Declaration of Human Rights is a declaration in which the fundamental rights and freedoms of women, men and children are determined and guaranteed. The declaration also provides general definitions of economic, social and cultural rights as well as civil and political rights. The first Article of the Declaration is "All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience, they should treat each other with a sense of brotherhood." and all Articles address fundamental, cultural, economic, political and social rights of people all over the world. The Declaration, along with the International Covenant of Economic, Social and Cultural Rights, International Covenant on Civil and Political Rights and Optional Protocols constitute the International Human Rights Law.

2.2.2 World Bank Requirements

The World Bank's Environmental and Social Framework (ESF)'s Environmental and Social Standard (ESS) 10, "Stakeholder Engagement and Information Disclosure", recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice" (World Bank, 2017: 97). Specifically, the requirements set out by ESS10 are the following:

Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts. Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.

The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.

The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not." (World Bank, 2017: 98).

3. Brief Summary of Previous Stakeholder Engagement Activities

3.1 Key Stakeholder Meetings and Consultations

The TGF engagement activities, including a consultation meeting has been conducted by TSKB. Following that, in the implementation stage of TGF, consultation meetings, face to face interview, formal meetings and site visits have been held both TSKB and Maxis. For the scope of SEP studies, the previous and ongoing stakeholder engagement activities conducted are given in Table 1 below.

Table 1 Previous and ongoing stakeholder Engagement Activities

Location	**Event**	**Date**	**Participants**	**Key Points of Discussion**
Online/ In person meetings (TSKB HQ)	IBRD TGF Proposal	Nov-22, Feb-23, May-23	IBRD, TSKB	*Notifying the capital investments decision to SME companies in developing countries. *Limiting the scope of investments within the framework of Green and Greening Firms. Regarding this, aiming to increase environmental and social tendencies. *Providing private mobilization in addition to the resources provided by IBRD.
In person meetings (TSKB HQ)	Adoption of the Fund idea by TSKB	Nov-22 - May-23	TSKB (DFI, Corporate Finance, Engineering) Teams	*Discussion on the compatibility of the Fund's theme with TSKB's vision and mission. *Determining TSKB's financial return expectations regarding the Fund. *Sampling the sectors in which the Fund will invest *Obtaining the approval of TSKB top management *Providing information about IBRD E&S standards to TSKB teams
Online Meetings	Fund Manager Selection	Jan-23, Feb-23, Apr-23	TSKB, Maxis, Other Fund Managers	*Providing information on the CMB obligations regarding the establishment of the Fund *Submitting the Fund's cost/expense criteria and offers to TSKB. *Discussion on the Fund's competencies related to E&S matters
Telephone calls, online meetings	Engagement with governmental bodies	May-22 – May-23	Ministry of Treasury and Finance (MTF)	*Introduction of the idea establishment of a green fund *Informing the relevant governmental body about the scope of the Fund

Workshop/ Conference meetings	Introduction of the Fund	May 23-25, 2023	TSKB, Potential investors of the Fund, Potential Investee Enterprises (PIE)	*TSKB representatives participated in Innovate4Climate conference in Bilbao to consult and share information regarding the Fund structure, opportunities and risks, primary requirements of the Fund.
Online Meeting	Stakeholder Engagement Meeting	5th Sep-23	Potential Investee Enterprises, Government Authorities, Potential Domestic investors	*Informing participants regarding the Fund's structure and governance, target companies, as well as environmental and social standards. *Overview of the gaps between WB ESSs and national regulations and common best practices. *Introduction of the existing grievance mechanism of the Fund. *Receiving feedbacks for early published draft Environmental and Social Commitment Plan and Stakeholder Engagement Plan.
Formal meeting (CMBT Office)	Stakeholder Engagement Meeting	5th Sep 23	CMBT , TSKB & Maxis	Official visit to provide preliminary information regarding TGF
Formal meeting (IBRD Office)	TGF Negotiations	19th Sep 23	MTF, IBRD, TSKB & Maxis	TGF official documents including commitment plans and agreements are negotiated.
Press Statement	TGF	15th Nov 23	Press, Government Authority	Finance Minister made a statement introducing TGF
Online Meetings	Potential TGF ESMS Officers	Dec 23-Feb 24	TSKB & Maxis	Job interviews for TGF ESMS Officer
Online Meeting	TGF ESMS Officer	20th March 24	TSKB and Maxis	Introduction of Maxis ESMS Officer to Project internal stakeholders
In person meeting (TSKB HQ)	ESMS Manual	27th March 24	TSKB and Maxis	Catch up meeting regarding ESMS manual developments and projected timeline
Online Meetings	ESMS Manual Development	24-25th April 24	TSKB and Maxis	Various meetings held for discussion about ESMS Manual content
Workshop	ESMS Introduction	6th May 24	TSKB and Maxis	ESMS Manual details are explained to all project parties and senior management oversight is obtained.

In person meeting (TSKB HQ)	ESMS Manual	17th May 24	World Bank TSKB and Maxis	World Bank's comments regarding ESMS Manual are discussed.
Correspondences (Letters, Phone, Emails)	TGF Fund Operation Manual	Apr-May 24	World Bank TSKB and Maxis	Various meetings held for discussion about Fund Operation Manual content
Correspondences (Letters, Phone, Emails) and in person meetings	Fund Establishment	Oct 23 – May 24	CMBT Maxis TSKB	Regular communication held with CMB due to application for fund establishment
Formal Meetings	Fund Management	August 25-June 26	Maxis and TSKB	Several meetings were held with potential and existing investee regarding E&S Performance
Formal Meetings	Fund Management	Nov 25	Maxis	An internal E&S Training session was conducted for all Maxis teams
Face to Face Interviews	Sub-projects' E&S Performance	August-June 26	Maxis	Face to face meetings were conducted with affected beneficiaries during the ESDD process and ESAP monitoring
Face to Face Interviews	Sub-projects' E&S Performance	Dec-25-June 26	Maxis	Implementation of the ESMS
Site Visits	Fund Management	August 25-June 26	TSKB and Maxis	Potential investee companies were visited for E&S screening and the ESDD process.
In person meeting (TSKB & WB)	Mission	January 14 2026	TSKB and Maxis	World Bank Mission Meeting was held to follow up on the TGF implementation process.
In Person Meeting (TSKB & WB Kenya & Kenya State Representatives)	Consultation Meeting	May 20 2026	TSKB and Maxis	To better understand the TGF Project structure and exchange views on the TGF Fund Structure as good practice.

TSKB and Maxis have adopted an approach that ensures stakeholders are properly informed about the Project and encouraged to participate in the consultation process of the Fund. In this regard, TSKB and Maxis disclosed draft and final version of the SEP and Environmental and Social Plan (ESCP) that set out the material measures and actions to be TSKB and Maxis carried out to address the potential environmental and social risks and impacts of the Project to stakeholder's review. In addition, Maxis disclosed the final version of the E&S Policy and ESMS Summary on its website.

Table 2 Disclosed Documents for Consultation

Documents	Web links	Disclose Date
Draft SEP &ESCP	Turkish version: https://www.tskb.com.tr/turkiye-yesil-yatirim-fonu English version: https://www.tskb.com.tr/turkiye-green-fund	14th July 2023
Final SEP &ESCP	Turkish version: https://www.tskb.com.tr/turkiye-yesil-yatirim-fonu English version: https://www.tskb.com.tr/turkiye-green-fund	29th September 2023
Final E&S Social Policy	Turkish version: https://www.maxisgs.com/uploads/file/turkiye-yesil-finans-projesi-girisim-sermayesi-yatirim-fonu-cevresel-ve-sosyal-politikasi.pdf English version: https://www.maxisgs.com/uploads/file/turkiye-green-finance-project-venture-capital-investment-fund-environmental-and-social-policy.pdf	11th March 2026
Final ESMS Manual Summary	Turkish version: https://www.maxisgs.com/uploads/file/turkiye-yesil-finans-projesi-girisim-sermayesi-yatirim-fonu-cevresel-ve-sosyal-yonetim-sistemi-ozeti.pdf English version: https://www.maxisgs.com/uploads/file/turkiye-green-finance-project-venture-capital-investment-funds-environmental-and-social-management-system-summary.pdf	11th March 2026

As shown in the previous stakeholder engagement activities list, an online stakeholder engagement meeting was held after disclosure of documents for consultation and providing Project information purposes. A summary of the meeting minutes is provided in Annex 2. TSKB and Maxis will provide information and seek feedback via its communication channels defined in this document and given web links during the whole lifecycle. For future stakeholder engagement activities follow-up actions will be documented through the stakeholder engagement log. As the Fund Manager, the Maxis ESMS Team has established the TGF Stakeholder Engagement Log, provided in Annex 3, to record and monitor all future stakeholder engagement activities with potential investees and other stakeholders.

4. Stakeholder Identification and Analysis

Affected parties refer to individuals or groups who are affected or likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. These stakeholders may include individuals or groups who are impacted or likely to be impacted directly or indirectly (actually or potentially), positively or adversely, by the Project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures.

Other interested parties (OIPs) refer to individuals or groups who may have an interest in the project because of the project location, its characteristics, its impacts, or matters related to public interest. For example, these parties may include regulators, government officials, the private sector, the scientific community, academics, unions, women's organizations, other civil society organizations, and cultural groups. These stakeholders may not experience direct impacts from the project but consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way.

Vulnerable/Disadvantaged Individuals/Groups refer to individuals or groups who because of their circumstances may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits.

Table 3 Identification of Stakeholders

Stakeholders	**Affected Parties/ Other Interested Parties/ Disadvantaged & Vulnerable Individuals or Groups**	**Main Influence on or Interest in the Project**	**Significance Level**	
			Interest	Influence
Investee Enterprises	Affected Parties	Directly benefitting from the Project Capacity building in E&S management	High	High
Investee Enterprises' Workers	Affected Parties	Potential impacts from the project working conditions and OHS impacts	High	High
Citizens and communities settled in the investee enterprises operation area	Affected Parties	Successful implementation of the Project with visible and measurable results Could be impacted by the business activities of beneficiary enterprises	Low	Moderate

Capital Markets Board of Türkiye (CMBT)	Other Interested Parties	Successful implementation of the Project with visible and measurable results	High	Moderate
Key government authorities	Other Interested Parties	Successful implementation of the Project with visible and measurable results	Moderate	Moderate
Other investors of the Fund	Other Interested Parties	Successful implementation of the Project with visible and measurable results	High	Moderate

Significance Level (Interest and Influence) provides information about the level of participation, how to establish a relationship with the stakeholders, how they will be informed, and the continuity and level of the established communication, in line with the needs of the stakeholders, depending on their sensitivity related to their impact-interest level. According to Significance Level of the identified stakeholders, the conditions will be considered as follows:

Table 4 Level of Interest

		Level of Interest		
		Low	Moderate	High
Level of Influence	High	Involve/Engage	Involve/Engage	Partner (Work Together)
	Moderate	Inform	Consult	Consult
	Low	Inform	Inform	Consult

Any stakeholders that are not identified at this stage of the Project may directly contact TSKB to make themselves and their needs known to facilitate the effective implementation of the SEP.

Sub-project level stakeholder analysis, including identification of stakeholders will be carried out for each sub-project independently. Investment Committee, where TSKB will be holding the leading role is going to be the responsible body to ensure that analysis is performed in line with national regulations, World Bank ESF and GIIPs.

5. Stakeholder Engagement Program

A variety of engagement techniques can be utilized to engage and consult with stakeholders, as well as to gather information from and deliver information to stakeholders.

5.1. Stakeholder Engagement Methodologies

In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- **Openness and life-cycle approach:** Public consultations for the project(s) will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.
- **Informed participation and feedback:** Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholder feedback, for analyzing and addressing comments and concerns, and for sharing actions which are included in the project to address the feedback ("closing the feedback loop").
- **Inclusiveness and sensitivity:** Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups that may be at risk of being left out of project benefits, particularly women, the elderly, persons with disabilities, displaced persons, and migrant workers and communities, and the cultural sensitivities of diverse ethnic groups.
- **Flexibility:** If social distancing, cultural context (for example, particular gender dynamics), or governance factors (for example, high risk of retaliation) inhibits traditional forms of face-to-face engagement, the methodology should adapt to other forms of engagement, including various forms of internet- or phone-based communication.

The level of impact, in addition to the needs and concerns of the stakeholders will find the basis of the tools and methods selected to engage with certain groups. Anticipated engagement methods and means of application for possible stakeholders of the Fund are presented in the Table below

Table 5 Stakeholder Engagement Methods

Engagement Method	Application of the Method	Possible Stakeholder
One-on-one meetings (annual dialogues with beneficiary enterprises)	- Information collection and sharing on an individual basis allowing to speak freely about sensitive issues - Establishing connections with key actors - Providing them an opportunity to voice challenges, needs, grievances/ concerns and priorities with regard to the Fund.	Potential and actual Investee Enterprises (with a special focus on including women-inclusive firms), Potential and actual investors of the Fund, Representatives of relevant state authorities and government officials, NGOs, IBRD,

	- Serving as beneficiary feedback mechanism and beneficiary survey to improve the implementation of Component 1.	
Correspondences (Letters, Phone, Emails)	- Information sharing (in particular technical) on Fund structural and scope - Invitations to annual dialogues, formal meetings and key events during Fund management - Information and data requests that will be utilized for Fund and sub-project implementation	Potential and actual Investee Enterprises, Potential and actual investors of the Fund, Relevant state authorities and government officials, NGOs, academia, national and local media and organizations/agencies, IBRD
Formal meetings	-Collective information sharing on project requirements and impacts -Receiving comments, feedback, views and perception of project from a group of high-level stakeholders -Gathering information about the sub-projects from investee enterprises - Sharing results of the annual beneficiary dialogues/ surveys, and sharing actions which were included in the project to address the feedback.	Potential and actual Investee Enterprises, Potential and actual investors of the Fund, Representatives of relevant state authorities and government officials, NGOs, IBRD,
Face to face interviews	- Baseline data collection on an individual basis with impacted Affected Parties - Monitoring of sub-projects' environmental and social impacts and activities on an individual basis	Project affected parties, Investee Enterprises' workers
TSKB & Maxis website	- Information sharing and progress updates -Disclosure of SEP, Exclusion List and other relevant Fund documentation - Announcements of key events, dates and published documents	Affected Parties, national, international and local media, academia, NGOs, businesses and organizations/agencies

5.2. Future Phases of Stakeholder Engagement

Stakeholders will be kept informed as the project develops, including implementation of the Stakeholder Engagement Plan, the grievance mechanism, etc. TSKB and Maxis will update their official website regularly with key project updates and reports on the Fund's environmental and social performance. The websites also provide information about the grievance mechanism for the Fund, describing in detail a clear and transparent system for receiving, recording, and resolving potential concerns and complaints that may arise from project implementation.

In addition, TGF has an ESMS which sets principles regarding information disclosure, implementation of stakeholder engagement plan stakeholder consultation and grievance redress activities, etc. for investee enterprises and their sub-projects in order to ensure that stakeholder engagement is implemented in the whole Fund lifecycle.

Table 6 Stakeholder Engagement Program

Stage	Main Stakeholders	Purpose	Time	Event/Location	Scope
Establishment of TGF	CMBT	Establishment of the Fund and its decision organs	2-3 months	Visit, Video Call, TSKB Headquarters etc.	*Establishment of TGF *Preparation of documents such as Fund by laws, Fund issuance certificate with CMBT *Establishment of Investment Committee and other necessary committees *Analyzing and presenting E&S capacity of Maxis *Establishment of the ESMS for the Fund
Origination	Potential Investee Enterprises (PIE),	Introduction of Project Overview	1 month	Site visit, Video call etc.	*Meetings with PIE in order to introduce the Fund, including its environmental and social (E&S) requirements. * Receiving feedback about structure and applicability of the Fund through collective formal meetings with PIEs
	Potential investors of the Fund, Potential Investee Enterprises (PIE), Key government authorities	Introduction of the Fund	1 month	*Innovate4Climate conference and other green finance conferences etc.	*TSKB representatives will be participating in climate related conferences to consult the Fund *Sharing information, including the Fund structure, opportunities and risks, primary objectives, eligibility criteria, E&S requirements, etc. *Receiving feedback about structure and applicability of the Fund through collective formal meetings with PIEs
	MTF	Development and implementation of the Project	16 months	Regular reports, telephone calls, online meetings	* Reporting Fund management units * Providing information about implementation of the Fund

					*Consultation in order to increase effectiveness of the Fund
Due Diligence	Potential Investee Enterprises (PIE)	Investigating project's financial, environmental, legal risks and management	3 months	Site visit, Video call, Expert meetings etc.	*Assigning all relevant due diligence (DD) advisors (financial, tax, legal etc.) *Coordination of DD process with all advisors and Target *Site visits, management meetings, expert sessions *Analyze the DD results and reflect the red flags into the PIE's analysis including E&S issues *Negotiations of terms (inc. E&S related ones) with the PIE's shareholder *Securing approvals from Investment Committee to submit NBD* *TSKB to organize collective formal meetings to share information and receive feedback from PIEs on the Fund (and sharing results of the annual beneficiary dialogues/ surveys and actions which were included in the project to address the feedback).
Portfolio management	Investee Enterprises (IE) - with a special focus on including women-inclusive firms, Potential Investee Enterprises' Workers,	Directing and supervising IE's risks and E&S impacts	5-10 years	Site visit, Video call etc.	*TSKB to hold board membership on each IE, providing strategic direction and oversight to the company's management team *Development of an ESMS to be prepared to close the gaps defined during DD stage. *Green and financial monitoring and supporting portfolio companies and conduct other related management activities *TSKB to organize annual one-on-one meetings with IEs (annual individual dialogues), providing the opportunity to voice challenges, needs, grievances/ concerns and

	Citizens and communities settled in the investee enterprises operation area				priorities with regard to the Fund. This will also serve as beneficiary feedback mechanism and beneficiary survey to improve the implementation of Component 1.
	Investee Enterprises (IE), Investee Enterprises' Workers, Citizens and communities settled in the investee enterprises operation area	Implementation of the ESMS developed by IE	5-10 years	Site visit, Face-to-face meetings, etc.	*Investee Enterprise will manage its sub-projects in line with the ESMS developed according to DD findings. Stakeholder engagement and disclose requirements will be defined in the ESMS that will be established for the Fund. *Monitoring E&S performance of the IE, including SEP activities such as grievance redress mechanism (Section 7.), disclosure activities, etc.
Exit	Investee Enterprises (IE)		6 months		*Maxis will screen exit opportunities (such as share buyback etc.) *Perform exit negotiations and execute exit procedures

*Non-Binding Offer

6. Resources and Responsibilities

TSKB and Maxis are responsible for development and management of the Fund. A dedicated Committee consisting of TSKB and Maxis has been assigned for Fund management duties, including stakeholder engagement activities. The Investment Committee is supported by 2 environmental and 1 social specialists from TSKB Engineering Department and 1 environmental and social management system officer and 1 social specialist from Maxis Private Equity Department in order to fulfill E&S requirements of the Fund. These specialists have strong experience in national and international medium and high E&S risk projects financed through IDF loans. Conducting E&S due diligence, planning, conducting, and analyzing stakeholder interviews and focus groups are selected practices performed by the team. Besides, the team has experience in development and management of ESMS for financial institutions. The stakeholder engagement activities are documented by the team right after the project-related public engagement activities have been carried out.Investment Committee and investee enterprises should have sufficient budget to manage stakeholder engagement process effectively. For the proposed engagement methods, including consultation meetings, formal meetings, face to face and focus group discussions, Investment Committee and investee enterprises are required to spend time and effort causing event organization and designated staff expenses. In addition to that the stakeholder identification process or social based analyses to be developed sub-project level will be carried out by an independent consultant to find out meaningful information about the community and region. E&S specialists shall accompany consultants during consultation meetings to ensure stakeholder engagement activities are conducted properly.

Table 7 Budget for Operational Expenses of SEP

Budget Category	**Estimated Total Costs (USD)**	**Remarks/ Resources**
1. Estimated staff salaries* and related expenses		
Fund Establishment Phase	25,000	Environmental engineers and social specialist salary in order to develop TGF
Investee Funding Phase	30,000	Expenses of E&S consultants who will assess E&S activities of investee enterprises
2. Events and communication campaigns		
Green Finance Conferences, etc.	12,500	TSKB & Maxis will attend Green Finance Conferences, have meetings with stakeholders to introduce TFG to the market
Communication Tools	2,500	TSKB will lead the Fund web site, hand out brochures, proceed social media campaign, publish clear GM guidelines, etc.
Consultation Organizations, (organization of focus groups, etc.)	7,500	Investee enterprises will organize consultation organizations about their investments, disclose E&S performances, etc.
3. Beneficiary engagement		
Organization of formal meetings, individual annual dialogues and surveys	7,500	TSKB with the support of Maxis will organize and manage collective formal meetings with PIEs and individual annual IE dialogues (serving as feedback mechanism and survey).
4.Grievance Mechanism, Trainings, others		
Advisory services for Investee enterprises	25,000	Investee enterprises will establish GRM, have trainings to build capacity, etc.
TOTAL STAKEHOLDER ENGAGEMENT BUDGET:	**110,000**	

7. Grievance Redress Mechanism

As Investment Committee members, TSKB and Maxis have separate and inclusive Grievance Redress Mechanisms in place to receive complaints from stakeholders of the Fund via website, the Fund specific e-mail or phone call. Those communication channels are defined separately in the table below.

TSKB Communication channel	
Web site	http://www.tskb.com.tr/en/about-us/tskb-contact-form http://www.tskb.com.tr/tr/hakkimizda/tskb-iletisim-formu
E-mail address	tgf@tskb.com.tr
Phone number	+90 0 212 334 50 50

Maxis Communication channel	
Web site	https://www.maxisgs.com/iletisim.html
Phone number	+90 0 (212) 283 51 13

An online contact form is utilized for the complaint management of TSKB. The form has a customized area for complaints to inform relevant departments within the Bank. When the complaint is received, "Customer Complaints Statement" is issued to record the subject within the Bank system within 2 days after the receipt of the complaint Simultaneously, the system informs the related department head in order to take necessary actions. After the necessary investigations are made, the final result is reached as soon as possible, the Evaluation and Conclusion Section of the Statement is filled in by the authorized employees and the reply is given within 30 days after the application is made. During the process, all steps are followed up by Board of Internal Auditors and Internal Control Department. Internal Control Department is responsible for monitoring and assisting relevant departments in implementation of the process where Board of Internal Auditors is responsible for ensuring that compliant management has been proceeded effectively. For the complaints received by the phone, same procedure is implemented via filling out the online contact form by TSKB staff. It should be noted that the mentioned system has the capacity to compile information about number of the complaints, reply periods, etc. in order to measure performance of TSKB in this regard.

On Maxis side, a similar grievance procedure is in place. There is a Grievance Committee consisting of General Director, Deputy Director General and Coordinator to manage the procedure. The Committee duties also cover to hear, investigate, and resolve any complaint, grievance, or conflict raised. However, Maxis is required to inform TSKB as soon as receives a grievance regarding the TGF since TSKB is leader of the Investment Committee. Then TSKB will implement its grievance procedure to solve any complaint raised.

TSKB Workers' Grievance Mechanism: Employees have the right to submit suggestions, express concerns and grievances related to the workplace, and to file complaints and lawsuits due to the administrative actions and procedures applied to them by their managers or the workplace. In that sense, TSKB has an internal grievance mechanism for its own employees which can also be reached anonymously and transparently. All necessary information about the communication channels which allow the employees to convey their grievances/suggestions about the TSKB and the working conditions are placed on TSKB's web-site. The grievances/suggestions are received, evaluated, and closed by Human Resources Department in 30 days after the application is made and employees are informed about the taken action.

National Grievance Mechanism: In Türkiye, CIMER (Presidency's Communication Center) which is a public relations application that is implemented on receiving and responding to the problems, wishes, demands and complaints of citizens in a fast way is available to be used by community. According to Directorate of Communications of Presidency of the Republic of Türkiye, if the subject of the application to CIMER contains a specific request, complaint or notice, the related institutions have to give a definite positive or negative answer within 30 days. TSKB will follow its Grievance Redress Mechanisms in case of any concern is received from this channel.

In line with the sub-project specific SEP and the requirements of other E&S documents, a Grievance Redress Mechanism (GRM) will be developed by the investee enterprises for potential use by both external and internal stakeholders (workers etc.). The fundamental aim of the GRM will be to timely resolve any project related grievance that may result in the complainant being worse off due to project activities. TSKB will ensure that investee enterprises have various communication channels established within their system in order to allow all stakeholders to submit their concerns.

The World Bank and the Borrower do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects.

8. Management, Monitoring and Reporting

Monitoring and evaluation of the stakeholder engagement process defined in this SEP is of utmost importance to ensure timely and effective decision making for Project implementation. The responsibility of monitoring and evaluation of stakeholder engagement processes belongs to TSKB, which is the leading body of the Investment Committee.

Monitoring reports will involve:

- Updates of the stakeholder list;
- Minutes of all meetings and attendance registers (sex disaggregated);
- Records of all consultation events;
- Records of all received, closed and recurrent grievances;
- Status of grievances (open/closed); and
- Status of monitoring of the project´s citizen engagement indicator (i.e. "Share of enterprises that report financial and non-financial support through TGF reflected their needs.") – which will be monitored during annual IE dialogues.

The stakeholder engagement for each investee enterprises and sub-projects will be conducted in the whole process of the investment cycle as well. During the project implementation, monitoring and reporting for the stakeholder engagement will be implemented primarily in the level of investee enterprises and sub-projects, together with the E&S monitoring and reporting for investee enterprises and subprojects. Each investee enterprise or subproject will establish its internal monitoring mechanism. For substantial-risk and medium-risk investee enterprises and subprojects, the Fund shall require the investee enterprises/subprojects to engage third-party professionals with tracked experience to monitor and evaluate the implementation of the E&S documents, including stakeholder engagement. For low-risk investee enterprises and subprojects, TSKB may require the investee enterprises to report their E&S performances or to engage third-party professionals in order to ensure stakeholder engagement process is proceeded properly.

During formal meetings with potential and actual IEs, the results of the annual beneficiary dialogues (and surveys), as well as the actions which were included in the project to address firms´ feedback will be disseminated and discussed.

Annex 1: **<u>Sample Grievance Form and Grievance Close Out Form</u>**

<table>
<tr><td colspan="7">GRIEVANCE FORM
If you wish to submit an anonymous complaint, you are kindly requested to fill out the (*) denotes required fields.</td></tr>
<tr><td colspan="2">Date *</td><td colspan="5"></td></tr>
<tr><td colspan="2">Reference Number</td><td colspan="5"></td></tr>
<tr><td colspan="2">Way of Receiving Grievance</td><td>Phone □</td><td>Meetings □</td><td>Application to Office □</td><td>Mail/email □</td><td>Field visit □</td></tr>
<tr><td colspan="2">Compliant Full Name
(optional and can be left blank)</td><td colspan="5"></td></tr>
<tr><td colspan="2">Compliant ID Number:
(optional and can be left blank)</td><td colspan="5"></td></tr>
<tr><td rowspan="4">Compliant Contact Information (optional and can be left blank)</td><td>Address - Village: *</td><td colspan="5"></td></tr>
<tr><td>Postal Code:</td><td colspan="5"></td></tr>
<tr><td>Phone:</td><td colspan="5"></td></tr>
<tr><td>Email:</td><td colspan="5"></td></tr>
<tr><td colspan="7">Content of Grievance or Complaint *</td></tr>
<tr><td colspan="3">• On abandonment (public housing)</td><td colspan="4"></td></tr>
<tr><td colspan="3">• On assets/properties impacted by the project</td><td colspan="4"></td></tr>
<tr><td colspan="3">• On infrastructure</td><td colspan="4"></td></tr>
<tr><td colspan="3">• On decrease or complete loss of sources of income</td><td colspan="4"></td></tr>
<tr><td colspan="3">• On environmental issues (ex. pollution)</td><td colspan="4"></td></tr>
<tr><td colspan="3">• On employment</td><td colspan="4"></td></tr>
<tr><td colspan="3">• On traffic, transportation and other risks</td><td colspan="4"></td></tr>
<tr><td colspan="3">• Other (Please specify):</td><td colspan="4"></td></tr>
<tr><td colspan="2">Description of the Grievance *
What did happen?
When did it happen?
Where did it happen?
What is the result of the problem?</td><td colspan="5"></td></tr>
<tr><td colspan="2">What would you like to see happen to resolve the problem? *</td><td colspan="5"></td></tr>
<tr><td colspan="2">Consent to disclose the grievance information to 3rd parties</td><td colspan="5"></td></tr>
</table>

<table>
<tr><td colspan="2">Signature of complainant</td><td></td></tr>
<tr><td rowspan="2">Received by</td><td>Full Name</td><td></td></tr>
<tr><td>Signature</td><td></td></tr>
</table>

<table>
<tr><td colspan="3">GRIEVANCE CLOSE OUT FORM</td></tr>
<tr><td>Grievance closeout number:</td><td colspan="2"></td></tr>
<tr><td>Define immediate action required:</td><td colspan="2"></td></tr>
<tr><td>Define long term action required (if necessary):</td><td colspan="2"></td></tr>
<tr><td rowspan="2">Compensation Required?</td><td colspan="2">Yes</td></tr>
<tr><td colspan="2">No</td></tr>
<tr><td colspan="3">CONTROL OF THE REMEDIATE ACTION AND THE DECISION</td></tr>
<tr><td colspan="2">Stages of the Remediate Action</td><td>Deadline and Responsible Institutions</td></tr>
<tr><td colspan="2">1.</td><td></td></tr>
<tr><td colspan="2">2.</td><td></td></tr>
<tr><td colspan="2">3.</td><td></td></tr>
<tr><td colspan="2">4.</td><td></td></tr>
<tr><td colspan="2">5.</td><td></td></tr>
<tr><td colspan="2">6.</td><td></td></tr>
<tr><td colspan="2">7.</td><td></td></tr>
<tr><td colspan="2">8.</td><td></td></tr>
<tr><td colspan="3">COMPENSATION AND FINAL STAGES
This part will be filled and signed by the complainant after s/he receives the compensation fees and his/her complaint has been remediated.</td></tr>
<tr><td rowspan="4">Complainant</td><td colspan="2">Notes</td></tr>
<tr><td colspan="2">Name & Surname</td></tr>
<tr><td colspan="2">Signature</td></tr>
<tr><td colspan="2">Date</td></tr>
<tr><td rowspan="4">Representative of the Responsible Institution / Company</td><td colspan="2">Title:</td></tr>
<tr><td colspan="2">Name & Surname</td></tr>
<tr><td colspan="2">Signature</td></tr>
<tr><td colspan="2">Date</td></tr>
</table>

Annex 2:

TÜRKİYE GREEN FINANCE PROJECT STAKEHOLDER ENGAGEMENT MEETING SUMMARY

(September 5, 2023)

As part of the stakeholder engagement activities under Türkiye Green Finance Project, both Turkish and English versions of the Project's Draft Environmental and Social Commitment Plan and Draft Stakeholder Engagement Plan were disclosed on the following web-pages on 14th July 2023 to receive feedbacks of the Project stakeholders.

• Turkish:

https://www.tskb.com.tr/turkiye-yesil-yatirim-fonu

• English:

https://www.tskb.com.tr/turkiye-green-fund

Different communication channels were made available by TSKB to enable the stakeholders convey their questions and suggestions on the Project's Draft Environmental and Social Commitment Plan and Draft Stakeholder Engagement Plan during the period of 14th July – 11th August 2023.

TSKB organized a consultation webinar on 5th September 2023 to inform the Project's stakeholders on the Project itself, Project's Draft Environmental and Social Commitment Plan and Draft Stakeholder Engagement Plan. Meeting invitations were sent to nearly 180 stakeholders including potential domestic investors, potential investee enterprises, state authorities, government officials and IBRD representatives. Webinar was conducted with the participation of 42 attendees including the panelists from TSKB.

Representatives of TSKB shared information with the participants regarding the project, Türkiye Green Fund, fund structure and governance, target companies, environmental and social standards. TSKB aimed to receive comments, feedback, and views of them for the Project and previously published Environmental and Social Commitment Plan and Stakeholder Engagement Plan. It is also highlighted that stakeholders can give feedback any time for the project and documents through the given communication channels on the webpages.

Questions mainly on Fund's exit strategy, financing methods, and cost advantage were raised by the participants during the meeting and duly answered by the panelists.

Annex 3: **TÜRKİYE GREEN FINANCE PROJECT STAKEHOLDER ENGAGEMENT LOG**

TGF STAKEHOLDER ENGAGEMENT LOG								
Information					Meeting Details			
No	Date	Name of TGF Project representative	Name of the stakeholder / Participants	Sector	Type of consultation	Engagement Channel (i.e., phone call, face-to-face, consultation)	Aim of the consultation	Key Points of Discussion