



Annual Environmental & Social Report (AESR)

Please read the points below carefully before completing this AESR template:

- a) This template is prepared to enable EBRD Clients to provide the EBRD with an annual report, in form and scope satisfactory to the EBRD, on environmental and social matters arising in relation to the Project (i.e., the business activity for which EBRD financing has been provided) or which may affect the Project. Where the Project is located at an existing Client facility and/or operation, the Client is required to provide information with respect to the Project and the existing facility and/or operation (e.g. health and safety statistics for the facility should be provided).
- b) This template requires provision of a summary of the Project environmental and social (E&S) performance, an update on implementation of the Environmental and Social Action Plan (ESAP) and other relevant information to help the EBRD review the Project's compliance with the applicable environmental and social laws and the EBRD Performance Requirements (PRs) as well as an overall update of E&S status.
- c) There are number of questions where further information is requested. Additional information can either be provided in summary form in the boxes provided or, if more convenient, additional information can be attached to the report.
- d) Some sections of this template may seem less relevant than others. The EBRD recognizes that this will be the case but encourages Clients to provide clear and sufficient information in all sections of the template. The more comprehensive the answers given, the less need there may be for the Bank to request further information. Please, therefore, try to answer the questions as fully and openly, as possible.
- e) The information provided in this template will constitute a representation regarding the Client under the financing documentation.

1. Project and Client Information

Project Name (As given in the Project Financing Documentation):	BİOTREND ÇEVRE VE ENERJİ YATIRIMLARI A.Ş.		
Project Op ID (As given in the Project Financing Documentation):	53000		
Client Name: BİOTREND ÇEVRE VE ENERJİ YATIRIMLARI A.Ş.			
Address: Kavacık Mah. Ertürk Sk. No:3/1 İç Kapı No:1 Beykoz/İstanbul			
Country: Turkey			
Client authorized representative:			
Name: Mehmet Ali NALÇACIOĞLU			
Title: Deputy General Manager			
I certify that, to the best of my knowledge and belief, the information contained in this AESR is true, complete, and correct in all material respects and this AESR contains no untrue or misleading statement and does not omit any material fact necessary to make the statements therein not untrue or misleading.			
Signature of Name: Mehmet Ali NALÇACIOĞLU		Date: 07.03.2023	
Contact Details:			
Telephone: +902166800000	Mobile:	E-mail: mehmetali.nalcacioglu@biotrendenerji.com.tr	
Reporting Period: 2022			
Unless otherwise stated, the information provided below shall be for this reporting period only.			

2. Project Update

Please provide an update on Project implementation, for example, status of construction, in operation, etc.:	Biotrend: - Implementation of quality system including environmental, social, operational procedures completed. - Sustainability Department established. “Chemical Upcycle Project” development is ongoing. Incentive applications, site investigations are ongoing. Detailed project feasibility completed. Discussion with Offtake Agreements are ongoing. SPV established (Biotrend
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	İleri Dönüşüm ve Yenilenebilir Enerji Teknolojileri A.Ş.). Pretreatment feasibility tests completed. • Biotrend HQ and SPV's IT Management System Developments Biotrend Energy has been using Sap S/4hana since 2021 and plans to simplify business processes by using MM, FI, CO, HR modules. We meet demands such as expenses, advances payment, day off, travel requests with eBA and Flovo software. Doğankent Elektrik Enerjisi Toptan Satış: • Electricity Storage License applications completed. Total 6x50 Mwe. Aksaray Project: • Landfill operation and electricity generation is ongoing. Mechanical sorting line design completed. Construction works will start in July 2023. • Administration building construction will start in July 2023. • Construction of landfill 2nd lot will start in May 2023. Aydın Project: • Plant in Operation. Plant has been operated in 2022 at 93% Capacity usage and 95% availability. • In order to provide the sustainable fuel supply and reduce the cost of the Biomass fuel, Additional Biomass fuels adaptation and upgrade some part of the plant in progress and will be completed until end of the June 2023. • Fuel chain contacts and organization improved on 2022. • In order to Homogenize the biomass fuels according to boiler design, Fuel homogenization system construction, commissioning and start up completed. • In order to provide the sustainable fuel supply and reduce the cost of the Biomass fuel, Additional Biomass fuels adaptation to plant in progress. Ayvacık Project: • In Ayvacık Project, Sanitary Landfill construction is under responsibility of Bank of Province (İller Bankası) and site will be delivered to Biotrend end of April. Energy transmission lines, some civil works are ongoing. Balıkesir Project: • The first landfill site was filled and rehabilitated. • Construction of the second landfill site was completed and started to fill with MSW. • The mechanical sorting and RDF plants are still under construction and planned to be operational in May 2023. • Desulphurization unit installation was completed and is in operation. Bergama Project: • 2nd and 3rd fermentation tanks were commissioned and are in operation. • The RDF plant is still under construction and planned to be operational in May 2023.
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	• Installed capacity of the CHP power generation was increased from 7,070 MWh to 8,484 MWh. • Installation of the firefighting system was completed; testing and commissioning process continues. • Installation of the additional desulphurization unit continues and planned to be operational in April 2023. Ezine Project: • Water treatment plant has been commissioned. • Compressor station has been commissioned. • Steam Turbine Oil flushing been completed. • Steam Boiler Hydrostatic pressure test has been completed successfully. • Steam Boiler Chemical cleaning in progress • Refractory dry out and Steam Blow out will be completed in February 2023. • PAC with government and operate the plant shall be done in March 2023. Ezine Phase II: • Financing stage. Project is under development phase. Harmandalı Project: • Installation of the mechanical sorting plant completed; testing and commissioning process continues. • The RDF plant is still under construction and planned to be operational in April 2023. Uşak Project: • The additional desulphurization unit is still under construction and planned to be operational in May 2023. • Installation of the firefighting system was completed; testing and commissioning process continues. İnegöl 1 Project: • Plant is in operation. İnegöl 2 Project: • The 3rd and 4th fermentation tanks were commissioned and are in operation. • Second gas holder installation was completed and is in operation. • Installation of the additional desulphurization unit continues and planned to be operational in April 2023. • Firefighting system installation was completed and is in operation. İskenderun Project: • Plant is in operation. Giresun Project: • Mechanical sorting plant installation completed and is in operation. • Second CHP power generation installed. Acceptance of the unit planned in April 2023.
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	- The wastewater treatment plant was commissioned and is in operation. Malatya Orduzu Project: 2nd fermentation tank was commissioned and is in operation. Malatya Kapikaya Project: - Installation of gas engines completed. - Plant is in operation. Sivas Project: - Plant is in operation. - Construction of heat supply lines for greenhouse will start in March 2023. Maven Tarım: - Civil works for greenhouse completed. - Construction of greenhouse is ongoing. - Production will start in July 2023.
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3. General

3.1. Have any new environmental and social¹ risks and impacts associated with the project (and existing facility, if applicable) been identified which were not foreseen by or contemplated in the Environmental and Social Action Plan?

Yes: ☐

If yes, please provide details:

No: ☒

3.2. Have there been any accidents or incidents that have caused damage to the environment, third party property/assets, cultural heritage, or created liabilities for the Client?

Yes: ☐

If yes, please describe incident/accidents, damage caused by the incident/accident, including details of actions to repair and prevent reoccurrence:

No: ☒

¹ Within the Bank's Environmental and Social Policy, "social" refers to those issues which pertain to project-affected people and their communities and workers and related to socioeconomic status, vulnerability, gender, gender identity, human rights, sexual orientation, cultural heritage, labour and working conditions, health and safety and participation in decision making.

3.3. Have there been any suspensions, closures, penalties, fines and/or corrective action plans imposed by environmental, health and safety, labour authorities on the Project (and existing facility, if applicable) or the Project/Client contractors?	Yes: ☒ No: ☐	If yes, please describe identified violations, including resulting penalties, status of implementing corrective actions to address any violations found: a) Environmental: 1. In our Balıkesir project, administrative sanctions were imposed by the Provincial Directorate of Environment, Urbanization and Climate Change when waste was disposed of in violation of the legislation. 2. In our Giresun project, administrative sanctions were imposed by the Provincial Directorate of Environment, Urbanization and Climate Change when waste was disposed of in violation of the legislation. 3. In our Giresun project, administrative sanction was imposed by the Provincial Directorate of Environment, Urbanization and Climate Change because the leachate treatment plant effluent values did not meet the discharge standards. b) health and safety: - c) labour: -
3.4. Have there been any exceedances of the emission and discharge standards that apply to the Project (either by regulation or as agreed with the EBRD)	Yes: ☐ No: ☒	If yes, please describe, including details of corrective actions:
3.5. Have there been any court cases filed or determined against the Project (and existing facility, if applicable) in the reporting period that are related to labour, health and safety, environment, land acquisition, damage to third party assets, etc.?	Yes: ☒ No: ☐	If yes, how many? a) Labour: 15 b) Health and safety: 0 c) Environment: 0 d) Land acquisition/resettlement: 1 e) Damage to third party assets: 1 f) Others: 0 Please also provide brief information about the cases. 1. Malatya 2nd Labor Court (2022/64) Accuser: Mikail Boztaş Defendant: Uşak Yenilenebilir Enerji Elektrik Üretim A.Ş. Subject: Claim for Receivables of Labor 2. İzmir 19th Labor Court (2022/77) Accuser: Gökhan Çoban Defendant: İzmir Doğu Star Elektrik Üretim A.Ş. Subject: Reemployment Claim 3. İzmir 18th Labor Court (2022/161) Accuser: Cihan Hüseyinoğlu Defendant: İzmir Novtek Enerji Elektrik Üretim A.Ş. Subject: Claim for Receivables of Labor 4. Karşıyaka 3rd Labor Court (2022/250) Accuser: Gencay Atınar Defendant: İzmir Novtek Enerji Elektrik Üretim A.Ş. Subject: Reemployment Claim 5. Karşıyaka 4th Labor Court (2022/126) Accuser: Volkan Özen Defendant: İzmir Novtek Enerji Elektrik Üretim A.Ş. Subject: Claim for Receivables of Labor 6. Karşıyaka 3rd Labor Court (2022/252) Accuser: Muhammet Ali Bayrak Defendant: İzmir Novtek Enerji Elektrik Üretim A.Ş.

- Subject: Claim for Receivables of Labor
7. İskenderun 2nd Labor Court (2022/151)
 Accuser: Erkan Ercan Koç
 Defendant: Novtek Enerji Elektrik Üretim A.Ş.
 Subject: Reemployment Claim
8. Karşıyaka 1st Labor Court (2022/181)
 Accuser: Burhan Çoban
 Defendant: İzmir Novtek Enerji Elektrik Üretim A.Ş.
 Subject: Claim for Receivables of Labor
9. Uşak 2nd Labor Court (2022/354)
 Accuser: Ertan Çakır
 Defendant: Uşak Yenilenebilir Enerji Elektrik Üretim A.Ş.
 Subject: Claim for Receivables of Labor
10. İstanbul Anadolu 2nd Labor Court (2022/668)
 Accuser: Fuat Ertunç
 Defendant: Biotrend Çevre ve Enerji Yatırımları A.Ş.
 Subject: Claim for Receivables of Labor
11. İstanbul Anadolu 9th Labor Court (2022/813)
 Accuser: Erkan Erhan Çam
 Defendant: Biotrend Çevre ve Enerji Yatırımları A.Ş.
 Subject: Reemployment Claim
12. Çine Civil Court of First Instance (2022/338)
 Accuser: Zekeriya Taşkıran
 Defendant: Biyomek Elektrik Enerjisi Üretimi Sanayi ve Ticaret A.Ş.
 Subject: Reemployment Claim
13. Bergama 1st Civil Court of First Instance (2022/564)
 Accuser: Minel Toz
 Defendant: İzmir Doğu Star Elektrik Üretim A.Ş.
 Subject: Reemployment Claim
14. Bergama 1st Civil Court of First Instance (2022/565)
 Accuser: Mehmet Kalın
 Defendant: İzmir Doğu Star Elektrik Üretim A.Ş.
 Subject: Reemployment Claim
15. Bergama 1st Civil Court of First Instance (2022/578)
 Accuser: Serhat Boyraz
 Defendant: İzmir Doğu Star Elektrik Üretim A.Ş.
 Subject: Reemployment Claim
16. Çine Civil Court of First Instance (2022/324)
 Accuser: Yalçın Payza
 Defendant: Biotrend Çevre ve Enerji Yatırımları A.Ş.
 Subject: Accuser claimed that his territory was used during transportation. A protocol was signed in agreement with accuser and the case was waived in return for payment of a price.
17. Malatya 5th Civil Court of First Instance (2022/301)
 Accuser: Güllü Çam
 Defendant: Doğu Star Elektrik Üretim A.Ş.
 Subject: It is a case for compensation resulted from traffic accident. The claim was about the loss of value of the vehicle. There is no bodily harm.

3.6. Have there been any new acquisitions, significant capital expenditures or divestments during the reporting period? **Yes:** ☒ **No:** ☐

If yes, please describe:

Doğankent Elektrik Enerjisi Toptan Satış A.Ş. owned by Biotrend on 16.11.2022. Doğankent A.Ş. was owned by Doğanlar Holding.

4. Human Resources

Unless otherwise noted, the questions in this section apply to both direct employees and non-employee workers (e.g., contractors and other 3rd party workers and contractors working on the Project site (and existing facility, if applicable) or performing work directly related to the core functions of the Project).

	Total	Recruited in the reporting period	Dismissed ² in the reporting period
Number of direct employees:	Men ³ : 516 Women: 67 Other: -	Men: 335 Women: 45 Other: -	Men: 230 Women: 27 Other: -
Number of contracted workers:	Men: 287 Women: 109 Other: -	Men: - Women: - Other: -	Men: - Women: - Other: -
Number of seasonal/temporary workers:	Direct Employees: Men: 0 Women: 0 Other: -	Contracted Workers: Men: - Women: - Other: -	
Number of employees:	International (0%)	National (100%)	Local (0%) ⁴
4.1. Were there any collective dismissals ⁵ and/or as defined in the national labour code affecting the directly employed workforce during the reporting period?	Yes: ☐ No: ☒	If yes, please describe, or attach to this report, the collective dismissals plan, including reasons for dismissals, number, gender, and age of workers involved, how they were selected, consultation undertaken, and measures to mitigate the effects of dismissals:	
4.2. Are there any collective dismissals planned for the directly employed workforce in the next year?	Yes: ☐ No: ☒	If yes, please describe, or attach to this report, the collective dismissals plan, including reasons for dismissals, number, gender, and age of workers involved, and selection and consultation process:	
4.3. Were there any changes to: • worker representation at the Project facilities? • collective agreements?	Yes: ☐ No: ☒	If yes, please provide details, and summarize engagement with workers, worker representatives, trade unions, and relevant state authorities during the reporting period:	

² Dismissal by the Client, including redundancies. This does not include employees/workers who voluntarily resigned or contractors whose contracts expired.

³ Gender identity: A person's psychological identification as man, woman or other, which may or may not correspond to the person's designated sex at birth and is not related to sexual orientation.

⁴ From directly affected/neighboring communities.

⁵ Collective dismissals cover all multiple dismissals that are a result of an economic, or organizational reason; or other reasons that are not related to performance or other personal reasons.

4.4. Have there been any strikes or other collective disputes related to working conditions in the reporting period? Yes: ☐ No: ☒

If yes, please summarize nature of, and reasons for, disputes and explain how they were resolved.

4.5. Have employees and contractors raised any grievances concerning the Project or the Client including working conditions? Yes: ☐ No: ☒

If yes, please state how many complaints were made and through which channels the issues were raised (e.g., grievance mechanism, trade unions, courts, media, etc.); report number of grievances by male and female staff and explain how the Client has addressed them:

4.6. Have employees and contractors raised any grievances concerning any type of discrimination, harassment (including sexual harassment) or bullying during the reporting period? Yes: ☐ No: ☒

If yes, please state how many complaints were made and through which channels the issues were raised (e.g., grievance mechanism, trade unions, courts, media, etc.); report number of grievances by male and female staff and explain how the Client has addressed them:

4.7. Is there an Equal Opportunities Action Plan/Gender Action Plan (GAP) for the Company? Yes: ☐ No: ☒

If yes, **please attach an implementation report** including any further progress made during the reporting in the implementation of the plan. Please provide the results of any other related monitoring carried out by the Client or its consultants and attach any additional information you think would be useful.

4.8. Have workers received training about their terms of engagement, working conditions, code of conduct, etc. during the reporting period? Yes: ☒ No: ☐

If yes, please information about the type of training received (including induction) and the number of workers trained.

[During the reporting period, employees received training on contract conditions, working conditions and code of conduct.](#)

5. Health and Safety

5.1. Please provide information on any accidents/incidents that have happened to employees, contractors or other third parties during the reporting period? Please confirm circumstances, severity of the accident (fatal, serious, minor etc.), status of investigation and remedial action taken (please attach additional documentation if appropriate).

	Employees	Contractors	Third Party	Details
Average workers	Men ⁶ : 516 Women: 67 Other: 0	Men: 287 Women: 109 Other: 0	Men: 0 Women: 0 Other: 0	
Total work hours	Men: 1,161.000 Women: 150.750 Other: 0	Men: 645.750 Women: 245.250 Other: 0	Men: 0 Women: 0 Other: 0	
Fatalities	Men: 0 Women: 0 Other: 0	Men: 0 Women: 0 Other: 0	Men: 0 Women: 0 Other: 0	

⁶ Gender identity: A person's psychological identification as man, woman or other, which may or may not correspond to the person's designated sex at birth and is not related to sexual orientation.

Lost time injuries	Men: 17 Women: 0 Other: 0	Men: 15 Women: 2 Other: 0	Men: 0 Women: 0 Other: 0	There are 17 lost time injuries at both Biotrend Energy and Contractors. These injuries are listed as:																														
				<table><tr><th>Kind of Injuries</th><th>Biotrend Energy</th><th>Contractors</th></tr><tr><td>Poisoning</td><td>4</td><td>0</td></tr><tr><td>Falling</td><td>3</td><td>7</td></tr><tr><td>Hitting or Falling of Equipment</td><td>3</td><td>5</td></tr><tr><td>Squeezing or Cutting</td><td>4</td><td>1</td></tr><tr><td>Burning</td><td>2</td><td>1</td></tr><tr><td>Wrenching</td><td>1</td><td>0</td></tr><tr><td>Insect Sting</td><td>0</td><td>1</td></tr><tr><td>Puncture Wound of the Eye</td><td>0</td><td>2</td></tr></table>	Kind of Injuries	Biotrend Energy	Contractors	Poisoning	4	0	Falling	3	7	Hitting or Falling of Equipment	3	5	Squeezing or Cutting	4	1	Burning	2	1	Wrenching	1	0	Insect Sting	0	1	Puncture Wound of the Eye	0	2			
				Kind of Injuries	Biotrend Energy	Contractors																												
				Poisoning	4	0																												
				Falling	3	7																												
				Hitting or Falling of Equipment	3	5																												
				Squeezing or Cutting	4	1																												
				Burning	2	1																												
				Wrenching	1	0																												
				Insect Sting	0	1																												
Puncture Wound of the Eye	0	2																																
First aid injuries	Men: 12 Women: 0 Other: 0	Men: 8 Women: 6 Other: 0	Men: 0 Women: 0 Other: 0	While there are 12 first aid injuries at Biotrend Energy, there are 14 first aid injuries at Contractors. These injuries are listed as:																														
				<table><tr><th>Kind of Injuries</th><th>Biotrend Energy</th><th>Contractors</th></tr><tr><td>Poisoning</td><td>0</td><td>0</td></tr><tr><td>Falling</td><td>1</td><td>12</td></tr><tr><td>Hitting or Falling of Equipment</td><td>2</td><td>0</td></tr><tr><td>Squeezing or Cutting</td><td>4</td><td>1</td></tr><tr><td>Burning</td><td>1</td><td>0</td></tr><tr><td>Electric Shock</td><td>1</td><td>0</td></tr><tr><td>Wrenching</td><td>2</td><td>0</td></tr><tr><td>Insect Sting</td><td>1</td><td>0</td></tr><tr><td>Puncture Wound of the Eye</td><td>0</td><td>1</td></tr></table>	Kind of Injuries	Biotrend Energy	Contractors	Poisoning	0	0	Falling	1	12	Hitting or Falling of Equipment	2	0	Squeezing or Cutting	4	1	Burning	1	0	Electric Shock	1	0	Wrenching	2	0	Insect Sting	1	0	Puncture Wound of the Eye	0	1
				Kind of Injuries	Biotrend Energy	Contractors																												
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				Burning	1	0																												
				Electric Shock	1	0																												
				Wrenching	2	0																												
Insect Sting	1	0																																
Puncture Wound of the Eye	0	1																																
Fire	Men: 0 Women: 0 Other: 0	Men: 0 Women: 0 Other: 0	Men: 0 Women: 0 Other: 0	The two small fire which did not give any damage to somebody, or something occurred in Harmandalı Facility.																														
Property damage	Men: 0 Women: 0 Other: 0	Men: 0 Women: 0 Other: 0	Men: 0 Women: 0 Other: 0	There is just one property damage which occurred in Ezine Facility.																														
Vehicle incidents	Men: 0 Women: 0 Other: 0	Men: 0 Women: 0 Other: 0	Men: 0 Women: 0 Other: 0																															
Near misses	Men: 20 Women: 3 Other: 0	Men: 0 Women: 0 Other: 0	Men: 0 Women: 0 Other: 0																															

5.2. Please provide information on the H&S training provided to employees or contractors during the reporting period. Please provide the training topics and the numbers of workers that have been trained.

- Occupational Health & Safety Training:

Place	Number of Participants	Place	Number of Participants
Kavacık	96	Aydın	85
İnegöl	43	Uşak	31
Bergama	53	Harmandalı	69
Malatya	46	Ezine	17
Aksaray	9	Sivas	14
İskenderun	8	Balıkesir	15
Giresun	21		

- Explosion Protection Training:

Place	Number of Participants
Bergama	3
Uşak	4
İnegöl	9
Malatya	5
Aksaray	3
Sivas	6
İskenderun	2

- Working at Height Training:

Place	Number of Participants
Bergama	38
Uşak	41
İnegöl	10
Aksaray	4
Harmandalı	10
Sivas	9
İskenderun	2
Ezine	15

- Confined Spaces Training:

Place	Number of Participants
Bergama	14
İnegöl	10
İskenderun	2
Malatya	4
Aksaray	3
Harmandalı	8
Sivas	6

- Logo out Tag out Training:

Place	Number of Participants
İnegöl	5
Bergama	10
Uşak	7
Malatya	7
Giresun	3
İskenderun	4
Sivas	2
Aksaray	2

- Control of Biological Substances Hazardous to Health Training:

Place	Number of Participants
Bergama	3
Uşak	9
İnegöl	5
Giresun	13
İskenderun	2
Malatya	4
Aksaray	3
Sivas	6

- Risk Assessment Training:

Place	Number of Participants
Kavacık	3
Uşak	2
İnegöl	3
Malatya	4
Harmandalı	6
Giresun	4
Ezine	3

- Emergency Squad Training:

Place	Number of Participants
Kavacık	8
Uşak	12
İnegöl	19
Malatya	11
Harmandalı	20
Ezine	9
İskenderun	9
Sivas	7

- Work Accidence and Near Miss Training:

Place	Number of Participants
Bergama	10
Uşak	4
İnegöl	10
Malatya	18
Aksaray	5
İskenderun	2
Sivas	6

5.4. Please provide information on the any H&S inspections/audits which have been carried out during the reporting period. Please confirm if these were carried out by the Client or by an independent H&S expert and if any corrective actions are outstanding.

- ISO 9001, ISO14001 and ISO 45001 audits have been carried out in Biotrend and Dogustar company in Malatya. In the result of the inspection, minor nonconformities have been detected and the corrective actions have been closed with for these nonconformities.
- In addition, the studies and corrective actions have been going on for nonconformities which have been come out in the EBRD- Environmental and Social Compliance Audit where have been taken place in all facilities and TSKB - Environmental and Social Compliance Audit where have been taken place in Aksaray and Ezine Facilities.

5.5. Please provide information on any major developments and achievements related to H&S management during the reporting period. Please include new safety measures which have been introduced, safety awards which the project has received or safety programs/initiatives that have been introduced.

- ISO 9001, ISO14001 and ISO 45001 inspections have been carried out in Biotrend and Dogustar company in Malatya. But the inspections and certifications have been planning in 2023 for Biotrend and its affiliates at all facilities which are in 18 difference places in Turkey.
- Lock out Tag out Process and Work Permit Process have been carried out at all facilities according to Lock out Tag Procedure. Lock out Tag out equipment has been supplied for all facilities and the practical training have been given to the employees at the facilities.

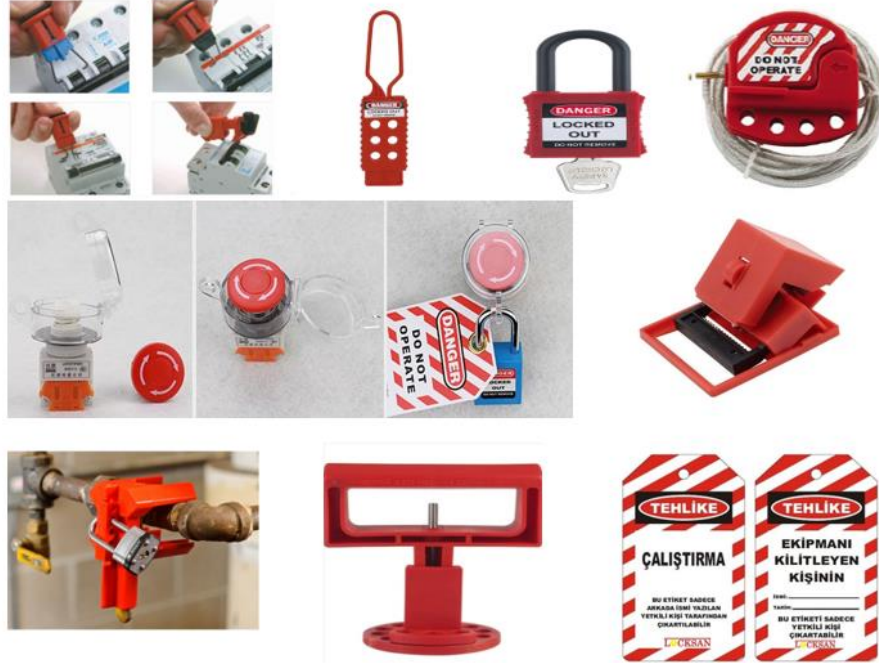


Figure 1: Lock out Tag out Equipment

- Safety and Environmental Information Board has been put in the social areas in the facilities. This Board provides information to all employees and shareholder about Politics, the announcement, Emergency Plan and Safety and Environmental Risk Assessments, H&S Reports.



Figure 2: Safety and Environmental Information Board

- In addition, Near Miss Boxes and Grievance Boxes have been put in the social area for the internal shareholders to get more safety and effective working places at the facilities.



Figure 3: Near Miss and Grievance Boxes

6. Stakeholder Engagement

6.1. Please provide information either below in the table or in attachments on the implementation of the Project Stakeholder Engagement Plan (SEP), or equivalent, and summarize any interactions with stakeholders during the reporting period, including:

- meetings or other initiatives to engages with formal stakeholders (e.g. authorities), members of the public or public organizations, civil society, communities, including vulnerable groups during the report period. Internal and External Stakeholder Complaint, Suggestions, and Request Mechanism was created for communication with internal and external stakeholders. Our Stakeholder Engagement Communication Plan is shown in table below.

Key Stakeholders	Communication Channel	Medium of Communication
Employees	Survey, meeting and training programs, social media, website, complaint, suggestion, and request mechanism	Regular
Local Communities	Stakeholder meetings, social media, electronic mail, telephone, complaint, suggestion, and request mechanism	Regular
Investors and Shareholders	General assembly, investor presentations, website, electronic mail, telephone, complaint, suggestion, and request mechanism	Regular
Financial Institutions	Social media, e-mail, telephone, website, complaint, suggestion, and request mechanism	Regular
Business Partners and Suppliers	Surveys, social media, electronic mail, telephone, website, complaint, suggestion, and request mechanism	Regular
Public Institutions	Surveys, social media, electronic mail, telephone, website, complaint, suggestion, and request mechanism	Regular
Customers	Surveys, social media, electronic mail, telephone, website, complaint, suggestion, and request mechanism	Regular
Universities	Surveys, social media, electronic mail, telephone, website, complaint, suggestion, and request mechanism	Regular
Media Institutions	Surveys, social media, electronic mail, telephone, website, complaint, suggestion, and request mechanism	Regular
International Organizations	Surveys, social media, electronic mail, telephone, website, complaint, suggestion, and request mechanism	Regular

- any coverage in the media on environmental, health and safety and social issues related to the Project, and interaction with any environmental or other community groups. Information is gathered from corporate social media accounts. Corporate social media accounts are not appropriate platforms to communicate shareholders directly. The communication process is conducted through proclaimed communication channels.
- interaction with environmental or other community groups.

	Dates	Stakeholders	Nature of engagement and topics presented/discussed
Meetings	Webcasts: 09.02.2022 09.05.2022 23.08.2022 10.11.2022 One-to-One Meetings: All throughout the year in 2022	Investment Banks, Asset Management Companies	Webcast Meetings/Company presented about the company, investment themes, one-to-one investor meetings
Public hearings	29.04.2022	All Shareholders	General Assembly Meeting/Please see below. https://www.kap.org.tr/en/Bildirim/1025561
Public/stakeholder events	Quarterly	Institutional Investors	Quarterly Financial Data
Focus group discussions	-		
Information disclosure	-		
Media coverage	Frequently	Public in General	While making environmental, social, and economic contributions to our world and our country, we define that we contribute to the world economy by transforming all the wastes generated in our life cycle into raw materials, as well as the renewable energy we produce.

6.2. Have any new vulnerable people⁷ been identified who may be potentially affected by the Project? If yes, please summarize additional measures undertaken in order to identify, engage and address risks and impacts to vulnerable groups.

No.

6.3. How many complaints or grievances did the Project (or existing facility, if applicable) receive from group members of the public or civil society organizations during the reporting period? Please indicate the stakeholder group and summarize the main issues raised in the complaints or grievances and explain how they were resolved:

Complaint Category	No. of Complaints			Summarize main issues, from which stakeholder group and resolution
	Closed	Open	Overdue*	
Land/asset acquisition and compensation	0	0	0	-
Environmental impacts	1	0	0	Within the scope of our Malatya Project, there was a CIMER complaint with the application number 2202761929 dated 16.06.2022 due to odor. Experts from Malatya Provincial Directorate of Environment, Urbanization and Climate Change conducted inspections within the scope of the facility. It was determined that there was no odor during inspection, odor emission measurement was made and presented to Malatya Provincial Directorate of Environment, Urbanization and Climate Change.
Disturbance/nuisance	0	0	0	-

⁷ Vulnerable people are people or groups of people who may be more adversely affected by project impacts than others by virtue of characteristics such as their gender, gender identity, sexual orientation, religion, ethnicity, indigenous status, age (including children, youths and the elderly), physical or mental disability, literacy, political views, or social status. Vulnerable individuals and/or groups may also include, but are not limited to, people in vulnerable situations, such as people living below the poverty line, the landless, single-headed households, natural resource dependent communities, migrant workers, refugees, internally displaced people, or other displaced persons who may not be protected through legislation and/or public international law.

Recruitment	0	0	0	-
Community health, safety, and security	0	0	0	-
Service provision/disruption/quality	0	0	0	-
Damage	0	0	0	-
Behavior of company or company employees/contractors	0	0	0	-
Gender based violence and harassment	0	0	0	-
Other	0	0	0	-
*Complaints which have been closed or are open but still unresolved outside of timeframe defined in the complaint's procedure				

If no complaints were received:

6.3.1. Does the Project/Client has a documented grievance procedure to address grievances from the public within defined timeframes?

Yes: ☒ No: ☐

People communicate with us via direct message and corporate web site's communication tab (Communication Form). Demands are processed in external stakeholder complaint suggestion and request form. Requests are shared with related department, The communication process is followed up until the end of the process, afterward the relevant form is closed. Requests are generally consisting of advertisement collaboration, fair/summit request, job applications and various collaborations.

6.3.2. Is information on how to raise a complaint available publicly, and via which mechanisms?

Yes: ☒ No: ☐

Faced to Face (Community Liaison Officer; Public Meetings) ☒

Printed Materials (e.g., Public notices; Leaflets) ☒

Company Website/Social Media ☒

Other (describe):

6.3.3. Confirm how a complaint can be raised:

Face to Face ☒

Complaint Boxes ☒

Company Website/Social Media/Email ☒

Community leaders/authorities ☒

Telephone/Text/WhatsApp ☒

Other (describe):

- Anyone who wants to voice their complaint has access to "Complaint Boxes" located in the facilities.
- People communicate with us via social media channels' direct message platform and corporate web site's communication tab (Communication Form). Demands are processed in external stakeholder complaint suggestion and request form. Requests are shared with related department, The communication process is followed up until the end of the process, afterward the relevant form is closed.
- Community leaders and authorities can deliver their or communities' complaints through face-to-face communication and telephone, text, or WhatsApp.

6.4. What information on environmental and social issues was put in the public domain during the reporting period (e.g., ESIA, environmental and social monitoring reports, Environmental, Social and Governance (ESG) reporting, etc.)? Please attach a copy or the link.

Not available.

7. Water Use and Efficiency

7.1. Does the Project accommodate any environmental investments resulting in reduction of water use or improvement of water efficiency?

Yes: ☐

No: ☒

If yes, please complete sections 7.2.1. through 7.2.2.

7.2. Does the Project (or existing facility, if applicable) involve production or manufacturing with a high-water demand (greater than 5,000 m³/day)?

Yes: ☐No: ☒

If yes, please attach a recent water balance and complete sections 7.2.1 through 7.2.2.

7.2.1. Total volume of water drawn from water source(s) in m³ during the reporting period.

Source	Volume (m ³ /yr)
Wells	-
Surface water	-
Municipal supply	-
Recycled/reused	-
Other (name)	-
TOTAL Annual Volume	-

7.2.2. Total units of production/manufacturing (please define units in the response).

8. Greenhouse Gas (GHG) Emissions

8.1. Does the Project accommodate any climate mitigation finance resulting in reduction of GHGs?Yes: ☐No: ☒

If yes, please complete section 8.3

8.2. Is the Project associated with direct and indirect⁸ GHG emissions of more than 25,000 tonnes/year CO₂-equivalent?

Or

Is the Project associated with a decrease in direct and indirect emissions at the existing facility of more than 25,000 tonnes/year CO₂-equivalent?Yes: ☒No: ☐Please check GHG emissions reduction table. ([EBRD AESR GHG Emissions Table.pdf](#))**8.3.** Please specify the following in case the Project encompasses any climate mitigation investments, leading to reduction of GHGs.

- GHG reduction technology used (please specify type of the technology, purpose of use, capacity installed): -
- Physical use of technology (annual production/performance, average load factor, annual numbers of hours in use): -
- Annual energy use by energy carrier (electricity, gas, heat, other fuels – please specify the annual quantity and unit per energy carrier): -
- Annual GHG emissions in tonnes CO_{2eq} per annum (if known): -

9. Land Acquisition

9.1. Is there a Resettlement Plan for the Project?Yes: ☐No: ☒**9.2.** Was there any land acquisition associated with the Project during the reporting period?Yes: ☒No: ☐

If yes, please answer the following questions:

9.2.1. Was the land acquired through amicable agreements (negotiated settlements) or through a court process (e.g., expropriation or other compulsory land acquisition process)? Please provide details below.Negotiated settlement: [For Ayvacık Biogas Power Plant; A final forest permit of 4039.17 m² has been obtained.](#)

Court Cases:

Please summarize the reasons for the court cases:

9.2.2. Number of communities affected: [None](#).

9.2.3. Number of people affected: None.

Landowners: - Men: - Women: - Other: -
 Formal Land Users: - Men: - Women: - Other: -
 Informal Land Users: - Men: - Women: - Other: -

9.2.4. Permanent land use: - Number of parcels: - Area affected: 4039.17 m² (forest area)

9.2.4. Temporary land use: - Number of parcels: No Area affected: No

9.2.5. Have any persons been physically displaced?

Yes: ☐

No: ☒

If yes, how many?

Did all persons receive compensation and resettlement assistance?

Yes: ☐ No: ☐

10. Community Development

10.1. Do you have a sustainable development program in place? If yes please summarize the sustainable development initiatives such as (environmental and social investment projects or community development initiatives undertaken by the Client during the reporting period, and associated expenditure: Comment on whether the community and/or civil society organizations has input into selection of the initiatives to be supported.

Projects which were fulfilled in 2022 were listed below. They were published in our website

(<https://www.biotrendenerji.com.tr/en> - Sustainability Tab) and Social Media Accounts (Twitter: BiotrendA, Instagram: Biotrendenerji, LinkedIn: Biotrend Enerji).

- In 2022, our works, waste management process and contributions to sustainability development and sustainable energy was explained to İnegöl-Dörtçelik Vocational and Technical Anatolian High School Student in İnegöl Landfill Gas Power Plant.
- Training about violence, manipulation, and labor rights were provided and family consultation, encouraging events, eco-therapy, frequency therapy services were arranged to our personnels in Bergama Landfill Gas Power Plant.
- A pergola consisted of waste materials was built as sustainable work area to show importance of recycling in Bergama Landfill Gas Power Plant.
- "Biomass Energy Journey" workshop was fulfilled in Çine, Aydın Landfill Gas Power Plant as the scope of sustainable biomass usage project in order to support the development of Turkish Economy on the path to green growth. Importance of modern bioenergy technologies in agro-industrial sector and energy efficiency measurements, integrity of political and framework contracts preparation and contribution of agricultural wastes to the economy were discussed.
- Biotrend Energy became UN Global Compact Member to proceed with transparency in the studies about environmental and social issues, social impact, working conditions and human rights.
- At the "Women-Friendly Brands Awareness Awards 2022", Biotrend Energy were awarded in the category of combating domestic violence and violence against women with our project which was violence awareness training implemented in Bergama Landfill Gas Power Plant Facility.
- Biotrend Energy became the sponsor of nature at the "Eco-Climate Summit" which was the world's first climate change summit.
- Biotrend Energy was selected as Turkey's Happiest Workplace in the "Renewable Energy Sector" category in the Turkey's Happiest Workplaces Survey.
- Biotrend Energy took place in "WeCycle Environment and Recycle Technologies Expo".
- Biotrend Energy won the "Bronze Sustainable Energy Award" by taking place in the top three in the "Sustainable Energy" category at the European Bank of Reconstruction and Development Sustainability Awards 2022.
- "The Best Communication of the Year Award" was won at the International Environment Communication Summit owing to the studies of sustainability communication.

11. Green Economy Transition (GET)

11.1. Does the Project encompass any green environmental finance related to wastewater treatment?

Yes: ☐ No: ☒

If yes, please provide the following information:

11.1.1. Type and capacity of technology used: -

11.1.2. Volume of wastewater treated, or wastewater avoided or reduced, in m³ per year: -

11.1.3. Any other information (e.g., effluent quality as per EU classification): -

11.2. Does the Project encompass any green environmental finance related to solid waste?

Yes: ☐ **No:** ☒

If yes, please provide the following information:

11.2.1. Type and capacity of technology used: -

11.2.2. Volume of waste processed, or waste disposed, recovered, recycled or reduced, in tonnes per year: -

11.2.3. Any other information (e.g., category of waste as per EU waste classification): -

11.3. Does the Project encompass any green environmental finance related to material efficiency or the circular economy?

Yes: ☐ **No:** ☒

If yes, please provide the following information:

11.3.1. Type and capacity of technology used: -

11.3.2. Amount of materials (by type of material) processed, recovered, recycled or reduced, in tonnes per year: -

11.3.3. Any other information (e.g., type of materials and type of circular economy activity as per EU circular economy classification): -

11.4. Does the Project encompass any green environmental finance related to pollution prevention control? treatment?

Yes: ☐ **No:** ☒

If yes, please provide the following information:

11.4.1. Type and capacity of pollution reduction technology or technique used: -

11.4.2. Amount of pollution (by type of material) reduced, in applicable units per pollutant per year: -

11.4.3. Any other information (e.g., type of pollutant): -

11.5. Does the Project encompass any other nature-positive or nature-based solutions investments, not accounted for above?

Yes: ☐ **No:** ☒

If yes, please provide a brief description including quantitative aspects (e.g., type of nature positive activity/technique) or quantitative impacts per year: -