



## 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 a 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 recognises 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 authorised 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 or Name:			Date: 02.03.2022
Contact Details:			
Telephone:	+902166800000	Mobile:	E-mail:
	mehmetali.nalcacioglu@biotrendenerji.com.tr		
Reporting Period:	2021		
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.:	<p><b>Biotrend:</b> Implementation of quality system including environmental, social, operational procedures targeted to complete in first half of 2022.</p> <p><b>Business Development Activities:</b> We are working on different projects abroad and in Turkey.</p> <p><b>Bergama Project:</b> 2. and 3. fermentation tanks construction is ongoing. Mechanical installation works started. Additional H2S removal units are in procurement phase. Expansion works for gas engines completed. Motor installation works will start in May. Step up transformers and other electrical items are being purchased. RDF production facility design works completed. Temporary operation permit to be obtained in March.</p> <p><b>Aksaray Project:</b> Electricity production started in December.</p> <p><b>Balıkesir Project:</b> Waste dumping started in new lot area. Gas production will increase in March. Commissioning of H2S removal plant will start in March. Mechanical sorting and RDF facility design completed. Procurement phase started. VCS- Carbon Credit Validation File Submitted.</p> <p><b>Harmandalı Project:</b> Mechanical sorting: civil construction started. Mechanical installation will start in April. Commissioning of H2S removal units started. VCS Carbon Credit validation file submitted.</p>
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	<p>Usak Project: Plant is in operation. Temporary operation permit obtained in December 2021. A second Organic waste loading bunker designed and procurement will start in April. Wastewater treatment plant commissioning started. VCS- Carbon Credit Validation files will be submitted in March.</p> <p>Inegöl 1 Project: Plant is in operation.</p> <p>İnegöl 2 Project: mechanical sorting plant 3<sup>rd</sup> shift started in December 2021. Waste transfers from Kestel and Gursu started. Second fermentation tank civil-mechanical and electrical works completed and commissioning started. Mid of March bioogas production will increase. Energy transmission line works continues. 2 gas engines purchased and will arrive in June. Additional H<sub>2</sub>S removal units are in procurement phase. Temporary Operation Permit expected to be obtained in May 2022.</p> <p>Giresun Project: Plant is in operation. 2<sup>nd</sup> gas engine will arrive in June. Mechanical sorting plant civil construction completed. Mechanical installation will start in March. Commissioning of wastewater treatment plant started.</p> <p>Sivas Project: Plant is in operation.</p> <p>İskenderun Project: Plant is in operation</p> <p>Malatya Orduzu Project: Plant is in operation.</p> <p>Malatya Kapıkaya Project: Plant is in operation. 2<sup>nd</sup> gas engine acceptance completed. Electricity production will increase in March. Wastewater treatment plant commissioning completed.</p> <p>Aydın Project: Plant is in operation. Biomass (Ulubey) processing plant is in operation.</p> <p>Ezine Project: Civil construction started. Equipment procurement is ongoing. Storage of biomass is ongoing on site.</p> <p>Ayvacık Project: Electricity production plant installation was completed in 2021. Completion of sanitary landfill expected in June. Plant will be operational in August.</p>
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### 3. General

3.1. Have any new environmental and social<sup>1</sup> 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: ☐  
No: ☒

If yes, please provide details:

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: ☐  
No: ☒

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

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

Yes: ☒  
No: ☐

If yes, please describe identified violations, including resulting penalties, status of implementing corrective actions to address any violations found:

- a) environmental,
- b) health and safety,
- c) labour

<sup>1</sup> 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.

facility, if applicable) or the Project/Client contractors?

a) Environmental  
Uşak Project

1. According to Article 8 of the Environment Law No. 2782 by the Provincial Directorate of Environment, Urbanization and Climate Change on 29.12.2021.

A report was taken on the grounds that organic wastes (tanning wastes originating from the leather industry) were stored in the sanitary landfill without any pre-treatment (pre-treatment) contrary to the temporary activity certificate.

2. According to the Environment Law No. 2782, Article 20 by the Provincial Directorate of Environment, Urbanization and Climate Change on 23.12.2021.

A report was taken on the grounds that daily cover soil was not used on the wastes in the landfill.

3. According to Article 20 of the Environment Law No. 2782 by the Provincial Directorate of Environment, Urbanization and Climate Change on 23.12.2021;

Since geotextile cover was not used in the sanitary landfill, a report was taken.

b) -

c) -

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	0
b) Health and safety	0
c) Environment	0
d) Land acquisition/resettlement	0
e) Damage to third party assets	0
f) Others	2

Please also provide brief information about the cases.

1. Malatya 3rd Civil Court of First Instance 2021/478  
(Defendant: DOĞU STAR ELEKTRİK ÜRETİM A.Ş.- Claimant: Malatya Metropolitan Municipality)

Due to the fact that the Electricity Generation Facility established for the Kapıkaya Environmental Integrated Project did not start operating within the period specified in the contract for the project, the lawsuit was filed with the claim that Malatya Metropolitan Municipality has lost of profit. The case is pending and a court date is awaited.

2. Ankara 1st Commercial Court of First Instance 2021/651  
(Defendant: BİYOMEK ELEKTRİK ENERJİSİ ÜRETİMİ SAN. VE TİC. A.Ş.- Claimant: EFOR ENDÜSTRİYEL TESİSLER MONTAJ İMALAT VE İNŞ. A.Ş.)

As a result of Efor's failure to fulfill its obligations under the EPC Agreement regarding the construction of Aydın Çine Biomass Facility operated by BİYOMEK, the agreement was terminated by Biyomek for justified reasons. In this context, the lawsuit was filed by Efor, whose contract was terminated, alleging that it had receivables arising from the invoice. This demand is almost unfounded

3.6 Have there been any new acquisitions, significant capital expenditures or divestments during the reporting period?

Yes: ☐  
No: ☒

If yes, please describe:

## 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 <sup>2</sup> in the reporting period
<b>Number of direct employees:</b>	Men <sup>3</sup> : <b>401</b> Women: <b>39</b> Other:	Men: <b>225</b> Women: <b>22</b> Other:	Men: <b>185</b> Women: <b>8</b> Other:
<b>Number of contracted workers:</b>	Men: <b>307</b> Women: <b>22</b> Other:	Men: Women: Other:	Men: Women: Other:
<b>Number of seasonal/temporary workers:</b>	Direct Employees: Men: <b>0</b> Women: <b>0</b> Other:	Contracted Workers: Men: Women: Other:	
<b>Number of employees:</b>	<b>International (0%)</b>	<b>National (100%)</b>	<b>Local (0%)<sup>4</sup></b>

4.1. Were there any collective dismissals<sup>5</sup> 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 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 summarise engagement with workers, worker representatives, trade unions, and relevant state authorities during the reporting period:

4.4 Have there been any strikes or other collective disputes related to working conditions in the reporting period?

Yes: ☐  
No: ☒

If yes, please summarise 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:

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

<sup>3</sup> 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.

<sup>4</sup> From directly affected/neighbouring communities

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

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 period in the implementation of the plan, using the monitoring indicators as detailed in 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.  
**We have workers received training about their terms of engagement during the reporting period, work on the code of conduct is ongoing.**

## 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
<b>Average workers</b>	Men <sup>6</sup> : 401 Women: 39 Other: 0	Men: 307 Women: 22 Other: 0	Men: 1 Women: 0 Other: 0	
<b>Total work hours</b>	Men: 962.400 Women: 93.600 Other: 0	Men: 736.800 Women: 52.800 Other: 0	Men: 2.400 Women: 0 Other: 0	
<b>Fatalities</b>	Men: 0 Women: 0 Other: 0	Men: 0 Women: 0 Other: 0	Men: 0 Women: 0 Other: 0	There were no any fatalities in the company
<b>Lost time injuries</b>	Men: 10 Women: 0 Other: 0	Men: 0 Women: 0 Other: 0	Men: 0 Women: 0 Other: 0	There were ten lost time injuries and it has been taken placed in Uşak, Aydın and Harmandalı facilities.
<b>First aid injuries</b>	Men: 3 Women: 0 Other: 0	Men: 0 Women: 0 Other: 0	Men: 0 Women: 0 Other: 0	There were 3 aid injuries in the Uşak facilities that didn't cause any lost time injuries.
<b>Fire</b>	Men: 0 Women: 0 Other: 0	Men: 0 Women: 0 Other: 0	Men: 0 Women: 0 Other: 0	
<b>Property damage</b>	Men: 0 Women: 0 Other: 0	Men: 0 Women: 0 Other: 0	Men: 0 Women: 0 Other: 0	
<b>Vehicle incidents</b>	Men: 1 Women: 0 Other: 0	Men: 0 Women: 0 Other: 0	Men: 0 Women: 0 Other: 0	There were just one vehicle incident by a man and it has been taken placed in Aydın facility
<b>Near Misses</b>	Men: 5 Women: 1 Other: 0	Men: 0 Women: 0 Other: 0	Men: 0 Women: 0 Other: 0	Totally 6 near misses have been taken placed and all of them were in Aydın facility. Five of it is by men employees and one of it is by a woman.

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.

The provided health and safety trainings during the reporting period have been listed below:

- **Occupational Health & Safety Training:**  
(KAVACIK (61)- İNEGÖL (36)-BERGAMA (50)-GİRESUN (13)-MALATYA (43)-AKSARAY (4)-İSKENDERUN (8)-AYDIN (52)- UŞAK (33)- HARMANDALI (64)-EZİNE (14)- SİVAS (12)- BALIKESİR (24)- ORDU (7)- ERZURUM (9))
- **Explosion Protection Training:**  
(BERGAMA (3)-İNEGÖL (5)-UŞAK (5))
- **Working at Height Training:**  
((BERGAMA (3)-İNEGÖL (5)-UŞAK (5) -GİRESUN (8))
- **Confined Spaces Training:**  
(BERGAMA (3)-İNEGÖL (5)-UŞAK (5)-GİRESUN (5))
- **Logo out Tag out Training (LOTO Training):**  
(UŞAK (1)-BERGAMA (3))
- **Control of Biological Substances Hazardous to Health Training:**

<sup>6</sup> 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.

(BERGAMA-İNEGÖL (5)-UŞAK (5) -GİRESUN (8))

- Emergency Team Training:

(İnegöl-13)

- Working at Places Having High Temperature Training:

(GİRESUN (5)-BERGAMA(3))

\* The numbers show that how many employees have been trained

5.4 Please provide information on 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.

Biotrend Energy get support from a joint health and safety unit as required by law. This unit provide services to the 18 facilities and central office of the Biotrend Energy. It provides some supervisions and trainings.

Providing health and safety information and training helps you to:

- ensure that people who how to work safely and without risks to health;
- develop a positive health and safety culture, where safe and healthy working becomes second nature to everyone;
- meet your legal duty to protect the health and safety of all employees.

In addition, the Quality and Health&Safety department of the Biotrend Energy check and regulate the labours and performance of the joint health and safety unit. Because Health&Safety is one of the the most significant department.

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 programmes / initiatives that have been introduced.

Biotrend Energy is a company that improves itself at the each departments day by day. Positive health and safety culture, safe and healthy working without any risks have been constituting by applied H&S managements.

## 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 summarise any interactions with stakeholders during the reporting period, including:

- meetings or other initiatives to engage with formal stakeholders (e.g. authorities), members of the public or public organisations, civil society, communities, including vulnerable groups during the report period.
- 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.

	Dates	Stakeholders	Nature of engagement and topics presented/discussed
Meetings	March, April 2021	Investment Banks, Asset Management Companies	Initial Public Offering Roadshow Meetings/Company presented about the company, sector and investment themes.
Public hearings	28.12.2021	All shareholders	Extraordinary General Assembly Meeting/Please see below <a href="https://www.kap.org.tr/tr/Bildirim/986595">https://www.kap.org.tr/tr/Bildirim/986595</a>
Public/stakeholder events	-		
Focus group discussions	-		
Information disclosure	-		
Media coverage	-		



6.2 Have any new vulnerable people<sup>7</sup> been identified who may be potentially affected by the Project? If yes, please summarise 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 members of the public or civil society organisations during the reporting period? Please indicate the stakeholder group and summarise the main issues raised in the complaints or grievances and explain how they were resolved:

Complaint Category	No. of Complaints			Summarise main issues, from which stakeholder group and resolution
	Closed	Open	Overdue*	
Land/asset acquisition and compensation	0	0		<i>Examples: Inadequate compensation; claims regarding ownership of land or assets, etc.</i>
Environmental impacts	2	0		<i>Examples: pollution; improper waste management; damage to flora and fauna, etc.</i> <b>Malatya Project</b> An inspection was carried out at the facility by the Provincial Directorate of Environment, Urbanization and Climate Change based on a complaint about odor. Odor analysis was made in the facility and its surroundings and presented to the institution.  <b>Giresun Project</b> Inspections were carried out at the facility by the Environment, Urbanization and Climate Change Provincial Directorate based on complaints about odor and wastewater. Improvement and modernization works were carried out at the leachate treatment plant. Daily application of cover soil has been increased to reduce odor complaints. In addition, odor analyzes were made.
Disturbance/nuisance	0	0		<i>Examples: dust; odour; noise or vibration affecting people; lack of access, etc.</i>
Recruitment	0	0		<i>Examples: Insufficient employment opportunities; unfair recruitment practices, etc.</i>
Community health, safety and security	0	0		<i>Examples: traffic and road safety, pressure on local health services, security, etc.</i>
Service provision/ disruption/quality	0	0		<i>Examples: disruption of service supply; poor quality service; complaints about tariffs, etc.</i>
Damage	0	0		<i>Examples: damage to individual property or land; community Infrastructure e.g. roads; livelihoods, etc.</i>
Behaviour of company or company employees/ contractors	0	0		<i>Examples: complaints regarding behaviour of company employees and contractors; customer facing personnel; unethical activities</i>
Gender based violence and harassment	0	0		<i>Examples: sexual harassment, sexual exploitation or abuse, physical violence, etc.</i>
Other	0	0		<i>Examples: community benefit sharing, local procurement, lack of project information or stakeholder engagement, etc.</i>

\* Complaints which have been closed or are open but still unresolved outside of timeframe defined in the complaints 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: ☐

6.3.2 Is information on how to raise a complaint available publically, and via which mechanisms? Yes: ☐ No: ☐

<sup>7</sup> 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 national legislation and/or public international law.



Face to Face (Community Liaison Officer; Public Meetings) ☐Company Website/Social Media ☐Printed Materials (e.g. Public notices; Leaflets) ☐

Other (describe):

6.3.3 Confirm how a complaint can be raised:

Face to Face ☐Company Website/Social Media/Email ☐Telephone/Text/WhatsApp ☐Complaint Boxes ☐Community leaders/authorities ☐

Other (describe):

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.

Please see attached Company 2021 Annual Report. Further information regarding Sustainability, Social Responsibility Projects can be reached at Annual Report. Part III- Sustainability. Also, further information regarding Corporate Governance can be found at: <https://www.kap.org.tr/en/Bildirim/1000754> and <https://www.kap.org.tr/en/Bildirim/1000755>

## 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 m<sup>3</sup>/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 m<sup>3</sup> during the reporting period.

Source	Volume (m <sup>3</sup> /yr)
Wells	
Surface water	
Municipal supply	
Recycled/reused	
Other (name)	
<b>TOTAL Annual Volume</b>	

7.2.2 Total units of production/manufacturing (please define the 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 indirect<sup>8</sup> GHG emissions of more than 25,000 tonnes/year CO<sub>2</sub>-equivalent?

Yes: ☒ No: ☐

Or

Is the Project associated with a decrease in direct and indirect emissions at the existing facility of more than 25,000 tonnes/year CO<sub>2</sub>-equivalent?

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 technology, purpose of use, capacity installed):  
Please check GHG emissions table
- 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<sub>2eq</sub> per annum (if known):

## 9. Land Acquisition

9.1 Is there a Resettlement Plan for the Project?

Yes: ☐ No: ☒

<sup>8</sup> Indirect emissions from grid electricity

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 settlements :

Court Cases :

Please summarise the reasons for the court cases:

9.2.2 Number of communities affected:

9.2.3 Number of people affected:	Land owners:	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:
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9.2.4 Temporary land use:	Number of parcels:	Area affected:
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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 programme in place? If yes please summarise 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 organisations has input into the selection of initiatives to be supported.

Yes we finished various projects. We publish in our website <https://www.biotrendenerji.com.tr/en> Sustainability Tab and Social media accounts (Twitter : @BiotrendA Instagram : Biotrendenerji Linkedin : Biotrend Enerji) Examples of projects that finished are ;

- Our Energy is For Our Employees First
  - o We are continuing our activities to raise violence, manipulation and legal rights awareness within our company. To this end, we provide free-of-charge family counseling for our employees, we hold morale nights, ecoterapy and frequency therapy sessions.
- Visit to Bursa İnegöl Solid Waste Disposal Facility
  - o The visit included informative commentary on the value added to nature during waste processing, its contribution to the economy, the facility's installation complying with European standards, and the process of waste's transformation into electricity. On-site observers of the facility expressed their thanks for the efforts.
- The Transformative Journey of Biomass Workshop held in our Aydın Çine Facility
  - o Our Aydın Çine Facility hosted The Transformative Journey of Biomass Workshop. The workshop was held as part of the "Sustainable Use of Biomass to Assist the Development of Turkey's Economy Towards Green Growth Project," and encompassed actions on themes such as the introduction of modern bioenergy technologies and energy efficiency measures in the agricultural sector, development of policy and framework programs, and economically benefiting from agricultural waste.
- Youth Energy at Our Facility
  - o Students from İnegöl Dörtçelik Vocational and Technical Anatolian High School affiliated to İnegöl District National Education Directorate visited our Biotrend Bursa İnegöl Solid Waste Disposal Facility. We told our visitors about how we contribute to a sustainable future at our facility.
- The Tree of life is growing with Awareness!

o We built a library of all the tree waste in our Bergama Lnadfill Gas Power Plant. In our library, called the Tree of life, the books we collected through volunteers began to meet the readers here.

- Waste Materials Strengthen Communication

o We have designed a gazebo to be used during lunch breaks in order to strengthen communication in our facility, increase the sense of belonging and create a sustainable working environment. Brought to life entirely with waste materials, our gazebo project not only provides our employees with pleasant moments, but also shows our guests the value of recycling.

- Our Bookshelves Meet Children

o Built and assembled completely with the support of our staff, our bookshelves met with children. Bookshelves designed entirely from waste wood in order to pass on the love of books and nature to new generations will continue to reach all corners of Turkey.

In addition to these projects Biotrend Energy receive multiple awards in 2021. We publish in our website's awards tab <https://www.biotrendenerji.com.tr/awards> and aforementioned Social media accounts.

- Renewable Energy Brand of the Year" Award at the Turkey Innovation and Success Awards

o We are happy to win the "Renewable Energy Brand of the Year" award at the Turkey Innovation and Success Awards. We would like to thank all our employees who brought this success to our company.

- 2021 Low Carbon Heroes Award From the Sustainable Production and Consumption Association

o As Biotrend Çevre ve Enerji Yatırımları A.Ş., we are proud of being awarded with 2021 SPCA Low Carbon Heroes Award at the 7th Istanbul Carbon E-Summit organized by the Sustainable Production and Consumption Association under the main sponsorship of the Ministry of Environment and Urbanization and Istanbul Technical University.

- 4th Energy and Natural Resources Summit Our Energy is Our Future Award

- Quality of Magazine Best Biomass Energy Award

o We are proud to be awarded the Best Quality Biomass Energy Award at the award ceremony in celebration of the 12th anniversary of Quality of Magazine journal. We express our sincere thanks to our colleagues who have won this award on behalf of our company.

## 11.Green Economy Transition (GET)

### 11.1 Does the Project encompass any green environmental finance related to waste water 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 (eg. 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 Amount of waste processed, or waste disposed, recovered, recycled or reduced, in tonnes per year:

#### 11.2.3 Any other information (eg. 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 (eg. 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 or control?**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 (eg. 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 (eg. type of nature positive activity/technique) or quantitative impacts per year:

**12. Environmental and Social Action Plan (ESAP) Status Update**

Please provide an update on the implementation of the individual actions contained in the ESAP using the ESAP table template and the guidance below. The ESAP for the Project is included in the Financing Documentation.

For each ESAP action item, please complete the two steps below and note under the ESAP Status column:

**1. Indicate the implementation status:****Exceeding Action (EA):**

The Project has gone beyond the requirements of the ESAP action and its evaluation criteria within the defined timeframe.

**Completed Action (CA):**

The Project has completed the ESAP action and fulfilled the evaluation criteria within the defined timeframe.

**On Track (OT):**

The Project is on track to complete the ESAP action and fulfil the evaluation criteria within the defined timeframe.

**Minor Delay (MD):**

The Project has not completed the ESAP action within the defined timetable but has plans, procedures and/or measures in place towards completing the ESAP within a reasonable timeframe. In such case please specify the reasons for the delay and expected timeframe for completion.

**Significant Delay (SD):**

No significant progress has been made towards completing the ESAP action within the defined timeframe. In such case please specify the reasons for the delay and expected timeframe for completion.

**Not Started (NS):**

Implementation of the ESAP action has not started as it is not yet applicable at this stage in the Project life cycle, e.g., if the Project is currently in the design stage and the ESAP action will be applicable only during the operational stage.

**2. Comment on implementation status:**

Provide a brief commentary on the implementation status and provide additional documentation to support the status update where relevant (e.g. if a specific document or evidence is required as part of the evaluation criteria). For ESAP actions with delays or changes, explain the reasons for the delay or changes, measures planned to complete the action and the expected timeline. Please note that any material change to the ESAP or deadlines must be agreed with the EBRD.

Please note that the implementation of the ESAP is a condition of EBRD financing.

## ESAP Status Update

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Implementation Status (EA, CA, OT, MD, SD, NS)	Comment on Implementation Status
<b>PR1</b>	<b>Assessment and Management of Environmental and Social Risks and Impacts</b>							
1.1	<i>Client to add ESAP actions as they appear in the legal documentation.</i>	<i>Client to add ESAP actions as they appear in the legal documentation.</i>	<i>Client to add ESAP actions as they appear in the legal documentation.</i>	<i>Client to add ESAP actions as they appear in the legal documentation.</i>	<i>Client to add ESAP actions as they appear in the legal documentation.</i>	<i>Client to add ESAP actions as they appear in the legal documentation.</i>	Client to complete	Client to complete
<b>PR2</b>	<b>Labour and Working Conditions</b>							
2.1							Client to complete	Client to complete
<b>PR3</b>	<b>Resource Efficiency and Pollution Prevention and Control</b>							
3.1							Client to complete	Client to complete
<b>PR4</b>	<b>Health, Safety and Security</b>							
4.1							Client to complete	Client to complete
<b>PR5</b>	<b>Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</b>							
5.1							Client to complete	Client to complete
<b>PR6</b>	<b>Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>							
6.1							Client to complete	Client to complete
<b>PR7</b>	<b>Indigenous People</b>							
7.1							Client to complete	Client to complete
<b>PR8</b>	<b>Cultural Heritage</b>							
8.1							Client to complete	Client to complete
<b>PR10</b>	<b>Information Disclosure and Stakeholder Engagement</b>							
10.1							Client to complete	Client to complete