TANAP

TRANS ANATOLIAN NATURAL GAS PIPELINE PROJECT

IESC Monitoring Report October 2025

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HOLDS

No.	Section	Description	Input From	Planned Date

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Acronyms and Abbreviations

AGI	Above-Ground Installation
BAP	Biodiversity Action Plan
BOS	Biodiversity Offset Strategy
BOMP	Biodiversity Offset Management Plan
BScm	Billion Standard Cubic Meters
BVS	Block Valve Station
CH	Critical Habitat
CS	Compressor Station
EBRD	European Bank for Reconstruction and Development
EEC	European Economic Community
EHS	Environment, Health and Safety
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
ERT	Electrical Resistivity Tomography
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
EU	European Union
FC	Fully Compliant
GHG	Greenhouse Gas
GIS	Graphical Information System
H&S	Health and Safety
HR	Human Resource
HQ	Headquarter
HSE	Health, Safety and Environment
IESC	Independent Environmental and Social Consultant
IFC	International Finance Corporation
IFI	International Financial Institutions
IMP	Integrity Mapping Platform
ISO	International Organization for Standardization
JHA	Job Hazard Analysis
KP	Kilometre Point
KPI	Key Performance Indicator
LEP	Land Exit Protocol
LRE	Land Rights Entity
LRP	Livelihood Restoration Plan
MoEUCC	Ministry of Environment, Urbanisation and Climate Change

MP	Management Plan
MS	Metering Station
MTI	Medical Treatment Injury
MSDS	Material Safety Data Sheet
NG	Net Gain
NGO	Non-Governmental Organisation
NNL	No Net Loss
OHL	Overhead Transmission Lines
OHS	Occupational Health and Safety
PAP	Project-Affected Person
PBF	Priority Biodiversity Features
PC	Partially Compliant
PEP	Project Execution Plan
PPE	Personal Protective Equipment
PR	Performance Requirement
PS	Performance Standard
QHSE	Quality, Health, Safety and Environment
QHSSE	Quality, Health, Safety, Social and Environment
RAP	Resettlement Action Plan
RETIE	RAP End-Term Impact Evaluation
RoW	Right of Way
SCC	Species of Conservation Concern
SE	Stakeholder Engagement
SEP	Stakeholder Engagement Plan
SMP	Social Management Plan
SPS	Safeguard Policy Statement
Sustainability	Sustainability Pty Ltd
TANAP	Trans Anatolian Natural Gas Pipeline
TAP	Trans Adriatic Pipeline
TARP	Trigger Action Response Framework
TPMC	Third Party Monitoring Company
WB	World Bank

Executive Summary

Sustainability Pty Ltd (Sustainability) is engaged as the Independent Environmental and Social Consultant (IESC) for the Trans Anatolian Natural Gas Pipeline (TANAP). This year marks the eighth year of monitoring. The field assessment was designed as a sampling exercise to assess TANAP against all of the relevant European Bank of Reconstruction and Development (EBRD) Performance Requirements and project standards. Due to the size of the TANAP pipeline and the logistical reality of assessing such a project the site assessment could only be completed for a pre-selected sample of the entire length of the pipeline. This year's assessment was focused on the very eastern portion of the pipeline around Ardahan. This is in line with the previous assessment; however, it should be noted that this report can only be based on the materials provided and areas visited during the site inspection. Finding no non-conformances does not necessarily represent a fully compliant project – it represents the areas, work, systems, etc., assessed as part of the risk-based focused assessment.

The 2024 Project Execution Plan (PEP) has described the continuation of the IESC Services for operation phase(s) of Phase 0 and Phase 1, which includes assessing the various environmental and social requirements of the International Financial Institutions (IFIs) including EBRD's Performance Requirements (PRs), TANAP policies and the commitments given in the Environmental and Social Impact Assessment (ESIA) package including the management system documents of both TANAP and its Contractors. The services include the presentation of recommended actions associated with identified non-compliances or areas of improvement.

The PEP presents the implementation arrangements reflected in the IESCS contract signed in 2024 and Sustainability's proposal.

The following sections outline the summary of specific Performance Standards.

PR 1 Monitoring and Reporting

Environmental

Environmental Monitoring and Reporting requirements are defined within the Environmental Monitoring Plan for Operations (TNP-PLN-ENV-GEN-008), as part of the Environmental Management System. Relevant updates were made to this Plan in 2025 following a

comprehensive annual review. Non-compliance with Project wastewater quality standards following biological treatment (especially at CS1 and MS1) has been an ongoing issue since 2022. TANAP has conducted further investigations with a view to identifying and resolving the cause of such high total coliform levels. Discharge quality is in line with the legal requirements in all of the stations. However, for some of the stations, results are non-compliant according to IFC standards, which are more stringent. In case the discharge quality is not compliant with the legal requirements, WWTP is isolated, and the wastewater is transferred to the licensed facility. As a result, a number of additional measures have been implemented, including increasing the retention time of liquid effluent in the chlorination tank and adding sugar as needed to the settlement and aeration tanks to maintain the condition of the bacteria. An improvement in total coliform bacteria levels has been observed, and the IESC is hopeful that a consistent improvement in wastewater quality standards will be evident during the 2026 monitoring site visit.

The majority of findings following the first-round of 2025 environmental compliance reviews conducted by the Environmental Department were related to the storage of hazardous materials and waste. The findings were all relatively minor issues that can and should easily be rectified. At CS1, the IESC did not observe the majority of issues that had been identified during the environmental compliance review, demonstrating that the QHSE Engineer at this Station is proactively seeking to address the majority of the non-compliances in a timely and proactive manner. However, at CS1, large anti-freeze tanks were stored directly on the ground, with no secondary containment, and at least one of the tanks was observed to be leaking. This was also identified as a non-compliance during the compliance review but had not been rectified. These findings are indicative of Station QHSE Engineers not consistently monitoring and/or implementing the requirements of TANAP's Operational Management Plans and Procedures. It is therefore recommended that TANAP conduct some targeted refresher training to ensure that all Station environmental staff are fully aware of the Company's environmental management requirements, especially in relation to hazardous materials and waste.

There has been no change to the risk-based inspection strategy for geohazards compared to 2024, whereby geohazard risk levels are determined according to the findings of the previous surveys, and the frequency of subsequent monitoring surveys is set according to the risk level. Following the latest annual slope erosion surveys, there are now no medium or high-risk sites for slope erosion across the Project. During 2025, the TANAP Landslide Inventory was comprehensively reviewed and updated to reflect the available high-precision photogrammetry data and the outcome of previous surveys (considering landslide type, size

and proximity to the RoW). There are now only 159 landslides in the Inventory. This has helped to ensure that resources are focused on monitoring those landslides that represent a potential risk to the integrity of the pipeline, as well as achieving associated cost optimisations.

PR 2 Labour and Working Conditions

TANAP's operational organisation is in place, alongside appropriate policies, management plans and procedures to recruit, select, manage and support the workforce. Adequate protections for the workforce, including equal opportunity and non-discrimination, are provided through the Human Resources Management Plan.

Social Inductions/Refresher trainings have continued to be organised for workers by the Site Social Impact Specialists; all trainings are complete at each site as of October 2025.

No worker complaints have been received within the monitoring period.

PR 3 Resource Efficiency, Pollution Prevention and Control

TANAP again met its KPI targets for water and electricity consumption in 2024 by achieving at least a 1% total reduction in consumption of these resources compared to the previous year at the Ankara Offices. This was achieved through the automation of lighting and the Heating, Ventilation and Cooling system, as well as the installation of sensor-fitted taps throughout the office. However, it will become increasingly challenging to continue to meet these KPI targets on a yearly basis as the pool of viable initiatives that have not already been implemented diminishes. It is therefore recommended that these KPIs are revised to be more achievable (i.e. not linked to an annual % reduction in consumption).

TANAP has achieved 100% target performance for all but one of the pollution prevention KPIs listed in Appendix 3 of the Environmental Monitoring Plan for Operations during 2025 to date. This includes that all planned environmental audits and training were completed, and that no fines have been issued for environmental violations. Additionally, there have been 0 complaints received relating to noise, water quality, waste, dust or odour and 100% of tests were compliant with standards for air emissions. There were no 0 spills to water, but 1 spill of over 50 litres to land, which was fully investigated and appropriate corrective actions taken. As such, the IESC is assured that the operational management systems, plans and procedures in place are generally adequate to ensure that direct negative environmental impacts of TANAP's operations are being avoided/limited.

Greenhouse gas emissions are being calculated and reported in line with Project commitments. Total annual GHG emissions for 2024 were 4.9% lower than in 2023. This was partly due to an 86.5% decrease in fugitive emissions following the first actual measurement of fugitive emissions at CS1/MS1 and CS5/MS1 (compared to them being calculated) and the repair of any minor gas leaks detected. GHG emissions for electricity consumption also decreased by 1.2% as a result of stable operational activities and QHSSE initiatives to reduce energy consumption. However, GHG emissions from stationary diesel consumption increased by 1.72% (on top of a 77.4% increase in 2023), again due to frequent power failures in rural areas and the need to use backup diesel generators to ensure continuous operations. GHG emissions also increased by 18.75% for mobile combustion due to the use of vehicles for site visits and maintenance activities. TANAP has investigated alternative sources of back-up power and the potential for using electric vehicles compared to petrol/diesel. TANAP has decided to install dynamic UPS at MS1 and CS1 stations to cover frequent power failures in that area, which will directly reduce GHG emissions. The implementation of this process is ongoing.

There are geo-hazard risks and impacts across the entire Project that must be monitored and managed on a continuous basis, including in those regions where there are active landslides that could present high levels of risk to the integrity of the pipeline. The IESC remains confident that the TANAP Senior Integrity Engineer for Geohazards is fully aware of any current geohazards and is managing them effectively and in a timeframe commensurate with risk levels. This depth of oversight is enhanced by targeted, risk-based SME surveys, aerial surveys and satellite imagery, installed monitoring equipment and the Integrity Mapping Platform.

PR 4 Health and Safety

OHS

OHS performance at TANAP remains exemplary, with the IESC confirming sustained adherence to industry-leading safety standards. The assessment employed a focused, risk-based approach, validating prior findings and highlighting ongoing operational excellence. TANAP maintained a zero Lost Time Injury Frequency Rate (LTIFR) and Total Recordable Injury Frequency Rate (TRIFR) for the review period, with no recordable incidents among employees. While 36 near-miss incidents were recorded, this was viewed positively as it reflects a strong reporting culture and proactive identification of potential hazards.

The project's internal OHS audit system continues to be robust, with a corrective action close-out rate of 97.3% during the assessment period, underscoring effective management oversight and accountability.

Physical OHS compliance inspections at CS1 revealed standards exceeding international benchmarks, with excellent housekeeping, clear emergency protocols, and strong adherence to PPE and permit-to-work procedures. Worker interviews confirmed high competency levels, with teams demonstrating a comprehensive understanding of safety documentation, hazard identification, and emergency response.

The IESC also noted significant improvements in chemical management following previous audit findings. TANAP implemented a new hazardous chemical storage matrix aligned with international hazard standards, alongside an online tracking system to ensure correct segregation and storage. This initiative effectively closed prior partial non-compliance findings and demonstrates continuous improvement.

Social

Yearly refresher activities on the Community-Based Emergency Response Plan (CBERP) continue via community informative meetings in all settlements throughout the pipeline. CBERP drills/trainings are conducted twice per annum, and emergency contact information (including mobile phone numbers rather than landlines) is updated to ensure TANAP has the capability of direct communications with relevant stakeholders in the event of an emergency. As was evident during the community meetings, the Site Social Impact Specialists have ongoing communication with the affected communities.

PR 5 RAP and LRP

Of the total 29,256 parcels subject to land acquisition, registration is virtually complete with 99.85% of public and 99.91% of private parcels finalized, while additional acquisitions for operational works like slope breakers and drainage channels are ongoing and being assessed through a dedicated geo-hazard study. Although all compensation for the original expropriation has been legally deposited into escrow accounts, there was a key challenge during the initial expropriation process where some district branches of Ziraat Bank required all co-owners to be present at the bank to process the payment. The high cost of obtaining the required documentation often exceeds the compensation value, making collection unviable for landowners. However, this issue has since been resolved; each owner may apply individually

to Ziraat Bank with the certificate of inheritance and the court case reference. In 2024, TANAP developed a poster informing all co-owners of this process. The project continues to address open grievances and is committed to compensating for lost livelihoods related to ongoing land acquisition activities.

PR 6 Biodiversity conservation and sustainable management of living resources

The Biodiversity Action Plan (BAP) requirements for critical habitat areas and Species of Conservation Concern (SCC) monitoring post-construction are ongoing and being implemented as described within the BAP. After 5 years of monitoring, the monitoring plan will be adapted. This is an opportunity to adjust the plan to focus on the key needs. Where species have not recovered, it is important to understand why and implement adaptive management strategies as needed. Where species have been observed regularly, the monitoring frequency can be reduced. It is unclear how successful the measures on the OHTL have been, as the monitoring results for fatality search are not clear. **This will be submitted as a standalone monitoring report for the OHTL at the end of the year. Additionally, TANAP will share this with IESC.**

Loss-Gain calculations will need to be updated based on the success of habitat restoration along the RoW. This can be achieved once the updated EUNIS mapping has been completed. It is recommended that this also takes into consideration the results of the flora and fauna monitoring, and a **Residual Impact Assessment is provided for natural and critical habitat features**.

Site-specific Biodiversity Offset Management Plans are being implemented by TANAP. The Forest Offset Management Plan is progressing very well, and the General Directorate of Forestry is pleased with the outcome, too. The Steppe Offset Management Plan is also being implemented, with a strong emphasis on social liaison, which has enabled a high “buy-in” to the project, increasing its likelihood of success, as grazing regimes are changed. Monitoring of the offsets shows clear success. It is now clear that the project needs to consider the long-term sustainability of these sites through more community activity and leadership.

PR10 Stakeholder Engagement and Disclosure

Stakeholder engagement throughout the 2024-2025 operational period has been maintained at an adequate frequency using diverse methods, including face-to-face meetings, written notifications, and community briefings, to effectively communicate key information on land use

conditions, safety, maintenance, and the grievance mechanism to local authorities, landowners, and the public. This outreach is substantiated by significant activity, with hundreds of documented notifications, land use violation warnings, and consultations across operational areas, complemented by large-scale annual meetings for transparent disclosure. Furthermore, the Social and Environmental Investment Program (SEIP) has demonstrated considerable impact through targeted community projects—such as health initiatives, women's economic empowerment, and biodiversity conservation—with a Social Return on Investment study confirming a high return, generating between 1.81 and 7.86 Lira in value for every Lira invested. While the grievance management system exceeds its closure target with an 87% rate, ongoing challenges include persistent land use violations, which the Social Impact team addresses by assisting landowners with permit applications, and a recognized need to update land access procedures to better protect vulnerable households from maintenance-related impacts.

Summary of concerns and recommendations

The following table outlines the key findings and recommendations of this report. The Table includes open items with recommendations. These items are fully explained in the relevant sections. The first column of the table shows the reference number as X.Y where X is the PR number and Y is the issue number. The reference number is followed by the section in which the issue is expanded upon. For reference, the summary findings table from last year's report with closed items has been attached in Appendix B.

Table 1 Summary Findings

Ref	Description of Issue	Recommendation (action)	Compliance Category	Commitment	Status
New findings from the 2025 Monitoring Period					
3.4 (2.4.5.3)	Anti-freeze tanks are being stored at CS1 with no secondary containment. This issue was also identified during the earlier internal	TANAP must ensure that all hazardous liquid containers are placed within adequate secondary containment, even if they are only being stored on a temporary basis.	PC	PR3 / PS3 TANAP Pollution Prevention Plan for Operations	**Open**

Ref	Description of Issue	Recommendation (action)	Compliance Category	Commitment	Status
	environmental compliance review audit, but had not been rectified.				
6.1 (2.10.1.1)	Adaptations were made to the OHTL to reduce electrocution. However, success is not clear, as the monitoring report does not address this issue directly	The IESC recommends that a standalone report is produced for the OHTL and monitoring follows GIIP for this type of survey on whether the mitigation has been a success.	PC	PR6 / PS6 Monitoring	**Open** The report will be submitted at the end of year.
Open findings from previous years					
1.1 (2.9.1.3)	The next review of the Operation Phase Land Access Management Procedure (Land Entry, Land Exit and Compensation) should consider and document how vulnerable households should be assessed and considered in the implementation of the Procedure.	TANAP has an obligation to ensure disadvantaged or vulnerable groups or individuals are not disproportionately affected by the project; Any additional support provided to vulnerable households should be appropriate to the nature and the scale of the impact on their affected land	PC	PR1 / PS1 PR10 Environmental and Social Management System	**Open**
3.3 (2.4.2.1)	Breaches in the Project wastewater quality standards at various TANAP	Review whether the remedial measures taken to address coliform exceedances at Stations	FC	PR3 / PS3 Resource Efficiency, Pollution	**Open** Remains open due to the issue being

Ref	Description of Issue	Recommendation (action)	Compliance Category	Commitment	Status
	Stations due to technical issues. There were regular non-compliances with the Project wastewater quality standards in 2025, following biological treatment.	have been effective, and conduct further investigation, and identify/implement additional mitigation measures if needed.		prevention and Control;	ongoing during 2025. Until evidence can be provided of a consistent improvement in wastewater discharge quality, and TANAP is better able to meet the relevant wastewater standards and KPI targets, the finding from 2023 (3.3) remains open.
6.2 (2.10.5.1)	Monitoring for vegetation and fauna during the operational phase is ongoing but data is not presented in a way that clearly shows trends and potential areas of concern.	The IESC recommends that the annual report includes a section which pulls together previous results to look at trends. This can be used to amend survey effort and approach as needed	FC	PR6 / PS6 Monitoring	**Open**

Ref	Description of Issue	Recommendation (action)	Compliance Category	Commitment	Status
6.6 (2.10.5.3)	Both the forest and steppe offset plans have been written and are being implemented. The proposed monitoring methodology is quite complicated and still requires a power analysis to determine sufficiency of plots to allow a statistically significant outcome. The offset need will change as the ROW re vegetates. This data is currently not being captured in the BOS residual impacts table, but following the EUNIS surveys in 2024 this can be updated.	For lender reporting, a simple set of metrics needs to be developed, so that for the steppe management, changes can be measured and reported on more easily. To determine if the offset requirements are being met (for no net loss/net gain) a ROW EUNIS habitat survey should be undertaken (ear 5), so that the residual impacts table in the BOS can be updated.	PC	PR6	**Open** This recommendation remains open as the EUNIS survey is due to be undertaken in 2027. It is also recommended that the results of the flora and fauna monitoring are also integrated to provide understanding of residual impacts across the project and whether NNL/NG has been achieved.

1. Introduction

1.1 Operation Context

TANAP Natural Gas Transmission Company (the Company) has engaged Sustainability Pty Ltd (Sustainability) for the delivery of Independent Environmental, Social and Occupational Health and Safety Monitoring and Consultant Services (IESCS) for the Trans Anatolian Natural Gas Pipeline (the Project), effective from 24 July 2018. The first IESCS monitoring visit undertaken for this assignment occurred in Türkiye from 8 - 12 October 2018. Sustainability had previously been engaged by the EBRD as the Independent Environmental and Social Consultant to support financing requirements and had completed environmental and social due diligence in 2016, semi-annual monitoring events during 2018 and 2019 and annual monitoring events from 2020 – 2025. This report presents the findings of the ninth monitoring event, which consisted of a site visit and document review of progress since the 2024 monitoring period. The site visit was completed from 6th to 10th October 2025.

The TANAP Project has completed a 1,811.7km pipeline to facilitate the transport of natural gas produced from the Shah Deniz Phase II development in Azerbaijan to Türkiye and Europe. The offshore section of the TANAP pipeline crosses the Dardanelles Strait in the Sea of Marmara. The Offshore section is approximately 17.5 km long. The Project has been developed by a group of shareholders who currently comprise of “Southern Gas Corridor” Closed Stock Joint Company (51%), BOTAS (30%), BP (12%) and SOCAR Türkiye Enerji A.S. (STEAS) (7%) and are herein referred to collectively as the “Sponsors”.

TANAP runs from the Georgian border, beginning in the Turkish village of Türkgözü in the Posof district of Ardahan, and passes through 20 provinces, ending at the Greek border in the Ipsala district of Edirne. Two off-take stations are located within Türkiye for national natural gas transmission, one located in Eskişehir and the other in Thrace. With 17.5km running under the Sea of Marmara, the main pipeline within Türkiye reaches a total of 1,811.7km, along with off-take stations and above-ground installations. TANAP has entered Phase 1 of operations after having completed Phase 0 of operations.

A Project Execution Plan (PEP) developed in 2024 describes the implementation of the IESC assessments for operation phase(s) of Phase 0 and Phase 1, which includes assessing the various environmental and social requirements of the International Financial Institutions (IFIs) including EBRD’s Performance Requirements (PRs), TANAP policies and the commitments

given in the ESIA package including the management system documents of both TANAP and its Contractors. The services include the presentation of recommended actions associated with identified non-compliances or areas of improvement.

This PEP presents the implementation arrangements reflected in the IESC's contract, Sustainability's proposal and the outcomes of the Project Kick-Off Meeting. The objective of the PEP is to both guide implementation and communicate the delivery approach to the key stakeholders. The PEP is adaptive and will be revised as required to ensure effective delivery of services.

1.2 Scope of Work and Objectives of the IESC

The scope of the IESC's activities is specific to the operation phase(s) of Phase 0 and Phase 1. The services require an independent assessment of the Project's compliance with relevant local and international legal requirements, the various environmental and social requirements of the International Financial Institutions (IFIs), TANAP policies and the commitments given in the ESIA package including the management system documents of both TANAP and its Contractors. The services include the presentation of recommended actions associated with identified non-compliances or areas of improvement.

The key objectives are to:

- Provide an independent assessment of the TANAP's compliance with TANAP commitments, including relevant local and international legal requirements and IFIs' Standards, Requirements and Guidelines; and
- Present recommended actions associated with identified non-compliances or areas of improvement.

To achieve these objectives, the IESC undertakes the role of identifying, monitoring and verifying:

- The implementation of specific provisions, commitments and the overall objectives of the Project ESIA, BAP, BOS, SEP, RAP, LRPs and other related documents including the ones developed in the operation phase;

- Implementation of mitigation measures, as documented in the Commitments Register, Environmental and Social Management Plans, Health and Safety Plans and relevant procedures to address material risks and issues associated with constructions works and with Phase 0 and Phase 1 of operations;

- Material changes in design and operations, which have been issued and assessed in line with the Environmental Management of Change Procedure (TNP-PCD-ENV-GEN-002); and

- The implementation of Legal, Political and Institutional framework as presented in Chapter 4 of ESIA Report (TNP-REP-ENV-GEN-002) considering the current updates and relevant IFIs' Standards, Requirements and Guidelines.

1.3 Operation Status

As of the October 2025 monitoring visit, the TANAP Project's construction phase was fully completed across all lots and above-ground installations (AGIs). The Phase 1 Main Stations (CS1, CS5, MS3, and MS4) were mechanically complete by April 2019, with technical handovers following in mid-2019. Linefill activities for the 48" pipeline section from CS5 to MS4 concluded in June 2019, and the TANAP-TAP Interconnection Pipeline was filled and pressurized by November 2019. The inauguration ceremony for TANAP Phase 1 took place at the Ipsala MS4 site later that month, confirming readiness for commercial deliveries to TAP. Operation Phase 0, consisting of a 1,338.85 km 56" pipeline, 39 Block Valve Stations (BVS), 6 Pig Stations (PS), 2 Metering Stations (MS), and 1 Offtake Compressor Station, was inaugurated in Eskişehir in June 2018, with commercial operations commencing shortly thereafter. BOTAS completed its second contract year by June 2020 with full operational efficiency.

Operation Phase 1, designed to supply gas to Europe, included a 454.04 km 48" onshore pipeline, 18.78 km of 36" offshore pipelines, and multiple stations, all mechanically completed by December 2018. Offshore pipeline construction also saw the completion of parallel pipelines, fiber optic cables, and 24 crossings. TANAP implemented key operational procedures, such as permits to work, energy isolation, and H&S risk management, by October 2019, allowing commercial operations for Phase 1 to start by December 2020. TANAP has since facilitated TAP commissioning under a framework agreement and, as of September 2025, has successfully transported 34.90 BScm of gas to Türkiye and 50.65 BScm to Europe.

1.4 Applicable Project Standards

International Lender Financed Projects are expected to be designed and operated in compliance with good international practices relating to sustainable development. TANAP adhere to relevant IFIs' Standards, Requirements and Guidelines including:

EBRD Environmental and Social Policy and Performance Requirements (2024)

- PR1 – Assessment and Management of Environmental and Social Impacts and Issues;
- PR2 – Labour and working condition;
- PR3 – Resource Efficiency, Pollution prevention and Control;
- PR4 – Community Health, safety and security[1];
- PR5 – Land acquisition, involuntary resettlement and economic displacement;
- PR6 – Biodiversity conservation and sustainable management of living resources;
- PR8 – Cultural heritage; and
- PR10 – Information disclosure and stakeholder engagement.

IFC Performance Standards (2012)

- Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts;
- Performance Standard 2: Labour and Working Conditions;
- Performance Standard 3: Resource Efficiency and Pollution Prevention;
- Performance Standard 4: Community Health, Safety, and Security;
- Performance Standard 5: Land Acquisition and Involuntary Resettlement;

[1] 'Security' was added the EBRD Environmental and Social Policy and performance Requirements in 2024

- Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources; and
- Performance Standard 8: Cultural Heritage.

IFC Environmental, Health and Safety (EHS) Guidelines, including EHS General Guidelines (2007)

As noted in the executive summary and Section 1.8 of this report, the site assessment was an indicative snapshot of the entire project and does not assess against all of these requirements. The findings in this report reflect only what was sampled and provided during the document request.

1.5 Sources of Information

For this year's assessment monitoring included document review and presentations as well as a physical site visit. Key documents were supplied by TANAP including presentations to specialists at Sustainability. Further documentation was provided immediately following the presentations as requested by the IESC team to allow clarification of the presented material. A full list of reviewed documents can be found in Appendix A of this report. The primary sources for information accessed for this review included, but was not limited to:

- Presentations prepared by TANAP teams focused on Operation Overview (primarily regarding Asset Integrity), Environment, Social, OHS, Land Acquisition and Permits, Risk Management, SEIP and biodiversity.
- Supplementary environmental and social assessments undertaken in accordance with Project management of change processes;
- Other relevant Health, Safety, Environmental and Social materials including HSE statistics, incident reports, external monitoring reports and audits, surveys, grievance registers and additional assessments;
- Environmental and social monitoring reports completed by third-party monitoring service providers and TANAP;
- Information from site inspections and interviews with TANAP employees, Contractors' workers and local stakeholders;

- Patrolling reports, Training Records, letters and other documents outlining the environmental monitoring of sites during the operational phase;
- Environmental and Social Management Systems (ESMS) for the operating phase including environmental social and H&S procedures.
- Various offset management plans for specific offset areas;
- Interviews with Project Affected Persons (PAPs); and
- Monitoring reports from previous years, as well as an Action Update Status document provided by TANAP outlining progress on previous recommendations.

1.6 Site Assessment Attendance

The site assessment was conducted from 6th to 10th October 2025 by the IESC, TANAP and EBRD. The team members of the IESC were:

- Claire Penny: Independent Consultant Team Environmental Specialist;
- Corin Simmonds: Independent Consultant Team Biodiversity Specialist;
- Herman Roos: Independent Consultant Team Social, labour and Cultural Heritage Specialist; and
- Aleksa Marinovic: Independent Consultant Team Project Manager and OHS specialist.

Due to logistics, Heath Thorpe was unable to attend the site visit and instead completed OHS discussions remotely and using the provided documents. Aleksa Marinovic validated document findings and conducted further assessment for OHS during the field visit instead.

1.7 Presentations Site Assessment Schedule

In summary, the following activities were undertaken during the site assessment:

Sessions	Scope
DAY - 1	**6 October, 2025 Monday**

Welcome & Opening Presentations TANAP Head Office Ankara	Opening presentations Overall operations progress Updates on SEIP Updates on Social Impact Management Updates on Environmental Management Updates on Land & Permit Management Updates on Biodiversity Offset Management Updates on Ecological Monitoring & BAP Revision
DAY - 2	**7 October, 2025 Tuesday**
Travel from Ankara to Kars	Travel
DAY - 3	**8 October, 2025 Wednesday**
Environment Team visit to MS1, RVX3A-0007 KP 0058+550, RVX4-5101 KP 0068+730, RVX1-0005 KP 0072+200 and BVS-2	River crossings Rip-Rap Slope breaker FCH-1 Drainage rectification (flood risk management), landslide CH1
Social Team visit to Ardahan, Posof, Çambeli, Hanak, Selamverdi, Kartalpınar and Büyüksütlüce villages	Overall review of stakeholder engagement activities and SEIP Projects
DAY – 4	**9 October, 2025 Thursday**
CS1 presentations and site visit	Site Team's presentations and site inductions
Environmental Team audit of CS1	Environment and OHS audit of CS1 facilities, including the red zone
Social Team visits to Ardahan, Damal, İkizdere and Eskikılıç villages	Overall review of stakeholder engagement activities and SEIP Projects
Close out Meeting	OHS, Social, Environment, and Biodiversity Presentations by the IESC team, including a discussion and questions with TANAP.
DAY – 5	**10 October, 2025 Friday**
Travel from Kars to Ankara/Istanbul	

1.8 Report Limitations and Assumptions

Due to the size of the TANAP project pipeline and the logistical reality of assessing such a project the site assessment could only be completed for a pre-selected sample of the entire length of the pipeline. This is in line with previous assessments; however, it should be noted that this report can only be based on the materials provided and areas visited during the site

inspection. Finding no non-conformances does not necessarily represent a fully compliant project – it represents the areas, work, systems, etc. assessed as part of the risk-based assessment. It should be noted that some sections of the pipeline have not been assessed by the IESC.

2. Findings and Observations

2.1 Classification Criteria for Review Findings

Project compliance and performance against the applicable Standards was considered by the IESC in terms of material risk to the Project and the IESC's confidence in the assessment of compliance following review of information available. The compliance classification of each topic will be determined as outlined in Table 2.

Table 2 Compliance Classification

NOP	**No Opinion Possible:** The IESC was not able to determine an opinion e.g. the topic was not a focus of the assessment; due to a lack of information; the inability to remotely visit a certain site; or the specific stage the Project is at.
Level of Non-Compliance (NC):	
EC	**Exceeding Compliance:** The Project has gone beyond the expectations of relevant IFI requirements / standard / principle. IFIs should be able to use projects rated EC as a role model for positive Environmental and Social effects.
FC	**Fully Compliant:** The project is fully in compliance with relevant IFI requirements / standards / principles, and local environmental, health and safety policies and guidelines.
PC	**Partially Compliant:** The project is not in full compliance with relevant IFI requirements / standards / principles, but has systems, processes or mitigation measure in place which are working towards addressing the deficiencies.
MN	**Materially Non-Compliant:** The project is not in material compliance with relevant IFI requirements / standards / principles, and the systems, processes and mitigation measures in place are not working towards addressing the deficiencies.

2.2 Environmental, OHS and Social Review

This Monitoring Report documents the findings and observations resulting from the site assessment from 6 - 10 October 2025 and the additional documentation provided to the IESC by TANAP. This report also factors in the review of HSE documentation and construction environmental and social management plans and procedures.

A summary of the classification of Project compliance with the Applicable Standards that have been allocated to each topic is presented in Table 3 below.

Table 3 Project Compliance with the Applicable Standards

Topic Heading	Compliance Criteria
PR/PS1 Environmental and Social Assessment	
Compliance with Local Legislation	FC (where sampled)

Status of ESAP	FC
Environmental and Social Assessment	FC
Environmental and Social Policy	FC
Environmental and Social Management System	PC
Organisational Capacity and Commitment	FC
Project Monitoring and Reporting	EC
Assessment and management of Change	FC
PR/PS2 Labour and Working Conditions	
Human Resource Policies and Working Relationships	FC
Protecting the workforce	FC
OHS	EC
Retrenchment	FC
Grievance mechanism	FC
Security Personnel Requirements	FC
PR/PS3 Resource Efficiency and Pollution Prevention	
Resource Efficiency	FC
Pollution Prevention and Control	FC
Greenhouse Gases	FC
Hazardous Substances and Materials	PC
PR/PS4 Community Health Safety and Security	
Infrastructure, Building, and Equipment Design and Safety	FC
Hazardous Materials Safety	NOP
Traffic Safety	EC
Exposure to Disease	FC
Natural Hazards	NOP
Emergency Management	FC
PR/PS5 Land Acquisition, Involuntary Resettlement and Economic Displacement	
Consultation	FC
Compensation	PC
Grievance	FC
Resettlement and Livelihoods Planning and Implementation	FC
Monitoring	FC
PR/PS6 Biodiversity	
Assessment and Identification of Impacts	FC
Biodiversity Management Planning	FC
Implementation of Mitigations	FC
Conservation of Biodiversity	PC
Restoration and Rehabilitation	FC
Monitoring	FC
PR8 Cultural Heritage	
Assessment	FC
Consultation	NOP
PR10 Disclosure and Stakeholder Engagement	
Stakeholder Engagement Planning	FC
Grievance management	FC
Information Disclosure	FC

2.3 Environmental and Social Assessment (PR1/PS1)

2.3.1 Compliance with Local Legislation

There were no warnings or penalties issued for any of the pipeline sections, stations, MCC, offshore section of the pipeline or Scada/Telecoms systems in relation to failures to meet the requirements of the relevant environmental authorities since the previous site visit. All required declarations to the Ministry of Environment, Urbanisation and Climate Change (MoEUCC) have been made by TANAP in accordance with relevant Regulations (e.g. for wastes generated at MS1, CS1, CS3, CS5/MS2, MS4, the MCC and Ankara HQ through the online Waste Declaration System of the MoEUCC in accordance with the Waste Management Regulation, and for GHG emissions from CS5/MS2 and CS1 via the online integrated environmental information system in accordance with the Regulation on Monitoring of Greenhouse Gas Emissions).

Operational environmental permits for TANAP stations are valid for 5 years, and at the time of the site visit, all TANAP facilities had valid environmental permits in place (with the next due date for renewal not until 29.12.2028, for the MCC). A permit register is maintained to track deadlines for permit renewals and ensure that the company is compliant with regulatory requirements at all times.

2.3.2 Environmental and Social Policy

TANAP's Integrated Management System Policy can be found online[2] specifying the company's higher-level commitments to health, safety, the environment and communities, to be managed through an ISO-compliant management system. Additionally, the Social Approach[2] remains a publicly disclosed document reflecting the commitment to effective management of community relations and grievance management, meeting current best industry practices during operations. Training is to be provided to employees and contractors on the Social Approach. The Approach can also be found on the TANAP website[3].

2.3.3 Environmental and Social Management System

An Operational Environmental and Social Management System (ESMS) has been developed and is being implemented by TANAP, including relevant Environmental Plans and Procedures.

During 2025, two operational environmental Plans/Procedures were reviewed and updated as follows:

- **Waste Management Procedure** (re-issued on 12-03-25 following a comprehensive review and the addition of a management procedure for Naturally Occurring Radioactive Materials (NORM).

[2] https://www.tanap.com/en/integrated-management-systems-policy
[3] https://www.tanap.com/en/social-approach

- **Environmental Monitoring Plan for Operations** (re-issued on 04-09-25 following a comprehensive review and the addition of a document dashboard, revisions to the use of the term 'project' throughout the document, the addition of exemption reports for CS1 and CS5 regarding Continuous Emissions Monitoring, updates to the KPIs (to include 2 new biodiversity KPIs) and updates to the scope of the third-party monitoring programme in Appendix 2).

TANAP's social management and monitoring plans are in place for the Operations phase. These include: the Social Action Plan for Operations, the Social Monitoring Plan for Operations, Stakeholder Engagement Plan[4] (and associated annexes); and Grievance Management Procedure[5]. The Operation Phase Land Access Management Procedure (Land Entry, Land Exit and Compensation) is the key procedure now in place for land access. The RAP End-Term Impact Evaluation (RETIE, see Section 2.7.4) has been completed, and implementation of corrective actions is ongoing.

2.3.3.1 Operational ESG Risk Assessment and Management

In line with TANAP's transition towards ESG-based Risk Management, a Materiality Assessment has been conducted to identify and prioritize key risks. The outcomes of this ESG approach to monitoring and managing its top material risks, ensuring strategic alignment with TANAP overall risk landscape.

At the beginning of 2025, site-based risk registers were developed using a Risk Breakdown Structure (RBS) framework. This approach allows to define and manage risks specific to each operational site while maintaining consistency within the TANAP risk management structure. Among the identified areas, Asset Integrity has emerged as the most critical issue, particularly considering the growing number of ESG-related threats and the evolving climate risk landscape.

The IESC was informed that the site-based risk inventories are focused on climate change and adaptation, particularly relating to flooding/extreme rainfall events and forest fires, which are becoming increasingly prevalent in Türkiye and present a risk to asset integrity. To mitigate and manage these potential threats, TANAP risk department has launched ESG-integrated risk assessments and strengthened its preventive and mitigation measures. Station-based hydraulic modelling, supported by digital elevation models and meteorological rainfall data, is being used to assess and continuously monitor site-specific flood risks, ensuring that such risks remain effectively controlled within the TANAP overall risk management framework.

Another emerging risk area is defined as forest fire. High-risk sites have been identified, and a Forest Fire Risk Register has been established to monitor and manage these risks proactively.

[4] SEP Rev. P6-1, last updated 23.08.2022
[5] Grievance Management Procedure, Rev P6-2, last updated 19.08.2022

Following this process, as of September 2025, the top 5 ESG risks to TANAP are as shown in Figure 1.

Rank No.	Risk Id	Risk Title	Initial Risk Score	Residual Risk Score
1	7	*Security threats to Operational Sites.*	(4E) - High	(4D) - Medium
2	1	*Health and safety incidents at Operational Sites.*	(3E) - High	(3D) - Medium
3	252	*Integrity threats at pipeline and stations leading to LOPC (Loss of Primary Containment).*	(3E) - High	(2D) - Low
4	251	*Third party damage to pipeline and AGIs resulting in uncontrolled gas release and potential fire.*	(3D) - Medium	(3C) - Low
5	254	*Pipeline Geotechnical hazards leading to LOPC (Loss of Primary Containment).*	(3D) - Medium	(3C) - Low

Figure 1: TANAP Top 5 ESG Risks

2.3.4 Organisational Capacity and Commitment

2.3.4.1 Environment

There has been no change to the composition of the Environmental Management Team based in the TANAP Head Office since the previous site visit in 2024. This comprises the QHSSE Director, Environmental Manager, 2 Senior Environmental Engineers and 2 Environmental Engineers, as illustrated in Figure 2. The IESC is comfortable that the Environmental Management Team has sufficient capacity and experience to ensure that TANAP is effectively managing its environmental performance. In addition, there are environmental employees based at the various operational Stations (CS1/MS1, CS3, MCC, CS5/MS2 and MS3 & MS4) and in the Projects and Modifications Department, whilst reporting administratively to the site managers, functionally also report to the Environmental Manager. Following the visit to CS1 and a review of the most recent Environmental Compliance Reports for all Stations, it is evident that environmental management at the Stations is being undertaken with a good level of proficiency, although there are some minor areas for improvement as outlined in later Sections of this Report.

Despite the Senior Integrity Engineer for Geohazards having responsibility for the monitoring and management of geohazard risks across the entire 1,811.7 km pipeline, the IESC is confident that with the support of SME's and RoW Patrol teams, they are fully aware of all geohazard risks across the Project and managing them effectively.

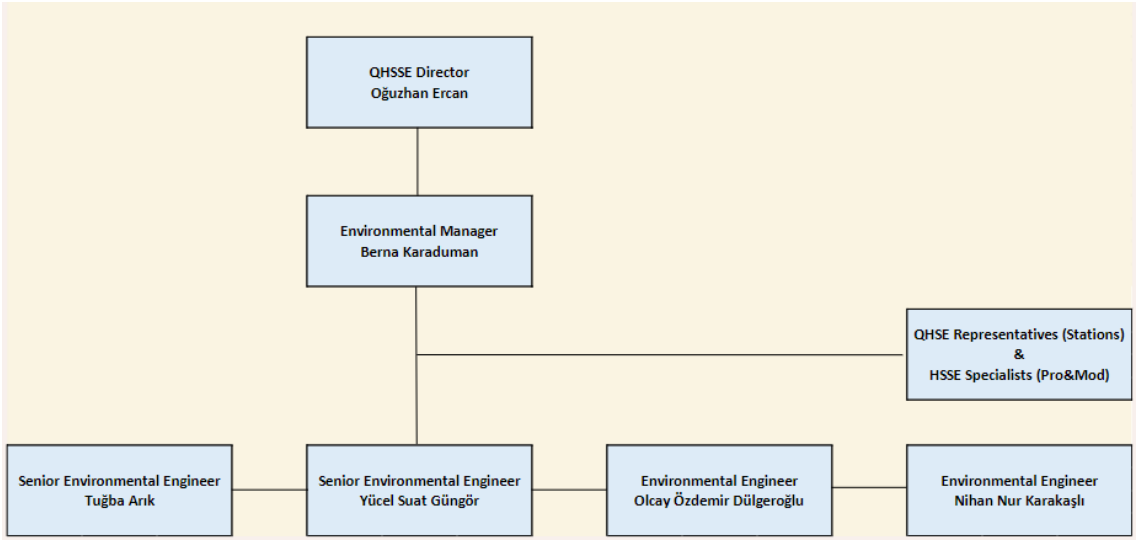

Figure 2: Environmental Department Organisational Structure

2.3.4.2 OHS

The Health and Safety department structure, including site employees, is noted in Figure 3 below.

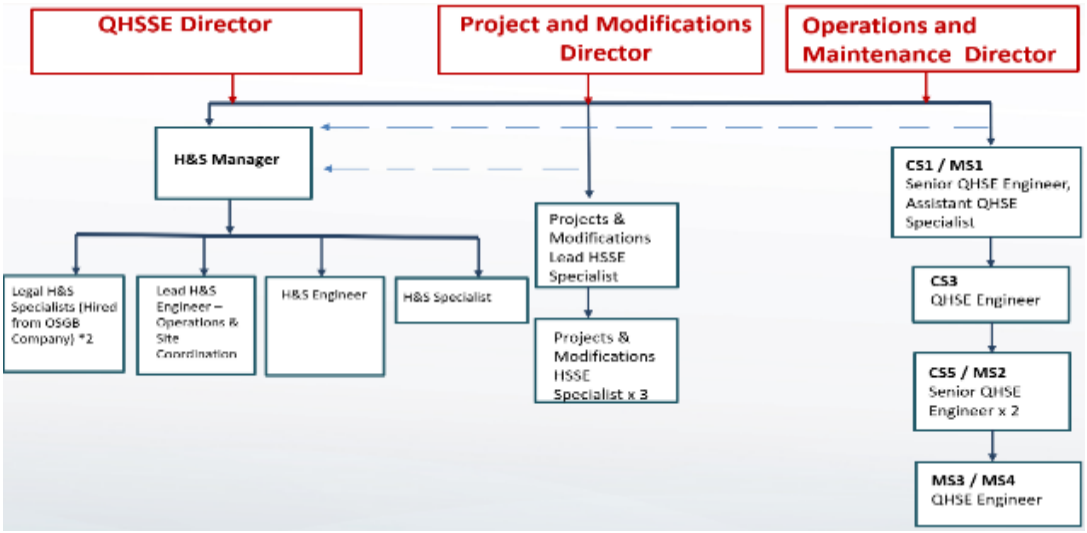

Figure 3 Health and Safety department structure as of 2024 site visit

The QHSE Engineers have received formal and hands-on training across a significant number of OHS aspects, including:

- Working at heights
- Energy isolation authority
- Confined space entry

- Chemical awareness
- Lifting activities

In addition to the OHS capacity in the QHSE engineers, there is process safety competence in the Operations and Maintenance team, which is vital in an operational plant.

2.3.4.3 Social

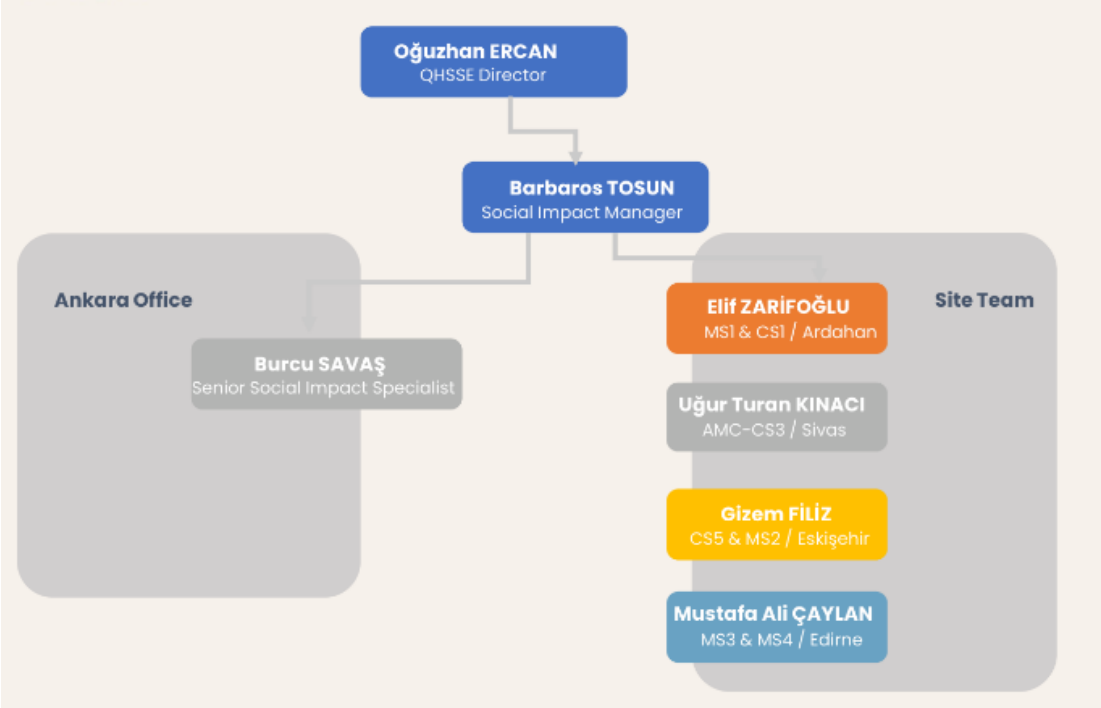

Figure 4 TANAP social impact team composition and organisational chart

TANAP's internal Social Compliance Reviews for Operations have once again been completed. These reviews are a combination of annual and semi-annual, internal compliance reviews for each operational area and include the identification and correction of potential challenges and general improvement of social performance of Operations. Assessments are against the Project ESIA commitments, legal and international requirements, and TANAP policies, plans and procedures. As of 2024, the monitoring period for these reviews has been revised to be annually, from semi-annual.

Findings included:

- Grievances are duly recorded and followed-up;
- Stakeholder engagement activities are conducted and documented accordingly;
- Efficient communication is upheld with the headquarter Social Impact Team;

- A proactive approach is adopted; and
- Strong coordination is maintained with other departments.

2.3.4.4 Environmental Monitoring and Reporting

As part of the Environmental Management System, TANAP is implementing the Environmental Monitoring Plan for Operations (OEMP) (TNP-PLN-ENV-GEN-008), which applies to all Project activities conducted during the Operations Phase. As outlined in Section 2.3.3 of this Report, this Plan was most recently reissued on 04-09-25 following annual review and associated revisions.

Conformance with Environmental Management System plans, procedures, standards and specifications, method statements, etc. and national legislative requirements are monitored through both internal and external audits.

Internal and external environmental monitoring, and associated reporting requirements, are summarised in Figure 5 below. 'TPMC' is the Third Party Environmental and Social Monitoring and Consultancy Services Company Assystem Enerji ve Çevre A.Ş.

Monitoring / Verification Activity	Reporting Format	Frequency
Internal Monitoring / Verification		
Environmental Site Inspections	Checklists	Weekly
Environmental Internal Audits/ Environmental Compliance Reviews	Audit Reports	As required
GHG Monitoring	Monitoring Report	Annually
External Monitoring / Verification		
IESC Inspections	Monitoring Report	Annually
Implementing and Monitoring of Biodiversity Offset Projects	Semi Annual Reports Annual Report	Semi-Annual Annually
RoW Patrol Inspections	Progress Reports Summary Report	Daily Monthly
TPMC	Progress Report Summary Report	Monthly Annually

Figure 5: Internal and external environmental monitoring and reporting requirements

Appendix 3 of the OEMP outlines the environmental Key Performance Indicators (KPIs) that have been set for the Operational Phase of the Project. It is required that each operational site registers its performance against the KPIs, to enable Project wide performance to be tracked from Ankara on a monthly basis. From the data provided on Environmental KPIs during Q1 and Q2 2025 for review, TANAP did not meet its target for ENV.KPI.0001 (Environmental Incidents) of '0' during April (where there were 2 incidents) and did not meet its target for ENV.KPI.0002 (Non-compliant Emissions (Air and Wastewater) of '0' in any month (with a total of 11 non-compliances in both Q1 and Q2). The cause(s) of the non-compliances with KPI ENV.KPI.0002 are assumed to be related to wastewater quality as there have been no air quality non-compliances during 2025 (see Section 2.4.2 of this Report). Non-compliance with Project wastewater quality standards at Stations (following biological wastewater treatment) has been an on-going issue for TANAP for a number of years and has consistently prevented the Company from achieving its KPI targets in relation to wastewater discharges. Please see 2.4.2.1 of this Report.

2.3.4.5 Internal Monitoring/Verification

In accordance with the OEMP, the TANAP Environmental Department conducts formal environmental compliance reviews at least twice per year at all operational Stations, with more frequent inspections if required. The objectives of the reviews are to assess compliance with TANAP's ESMS and relevant legislative requirements, identify the root cause of any non-compliances, and specify corrective actions/improvements where necessary (with deadlines for implementation). Any non-compliances are tracked through an Action Tracking Register. At the time of the site visit, the first round of reviews for 2025 had been completed for all Stations and the Reports provided for IESC review.

The majority of the non-compliances were related to the storage of hazardous materials and waste and were common to more than one station. For example, waste labelling was not compliant with the Regulation on Zero Waste at CS3, CS5 and MS4. The spill kit inventory was missing from the inside lid at CS3 and the MCC. There was a lack of secondary containment (drip trays) for chemicals/liquid hazardous waste at CS3, CS5 and the MCC. Additionally, at CS3, the regulatory limit of 6 months for the storage of hazardous waste had been exceeded, and at the MCC, gardening chemicals were being stored under the stairwell and not in the designated hazardous materials storage area. At CS5, the same issue was observed as at CS1, whereby anti-freeze tanks were being stored around the Station without secondary containment. The findings of the reviews all relate to relatively minor issues that can and should easily be rectified. At CS1, the IESC did not observe the majority of issues that had been identified during the environmental compliance review, such as a lack of secondary containment under liquid chemicals and hazardous waste, the wrong labelling of the hazardous waste storage area and contractor belongings being kept in the waste storage area. This demonstrates that the QHSE Engineers at this Station are proactively seeking to address the non-compliances in a timely and proactive manner. However, the IESC did observe the same problem with the anti-freeze tanks at CS1 – see Section 2.4.5.3 of this Report.

The non-compliances identified during the internal review and during the site visit are indicative of QHSE Engineers at Stations across the Project not consistently monitoring and/or implementing the requirements of TANAP's Operational Management Plans and Procedures. ***It is recommended that TANAP conducts some targeted refresher training to ensure that all Station environmental staff are fully aware of the Company's environmental management requirements, especially in relation to hazardous materials and waste.***

Furthermore, since the previous site visit, the Environment Team has participated in Integrated Management System (IMS) audits of the following internal departments:

- Operation Department
- Administrative Affairs Department

In addition to monitoring environmental compliance at Stations, the Environmental Management Department conducts audits of external companies providing environmental services to ensure the level of service being provided is in accordance with TANAP's requirements. The following service providers have been audited:ş

- SCADA/ICSS Services – ABB/Honeywell
- Projects and Modifications Services – ACD
- HVAC System – Honeywell
- Scaffolding Services – Anatek
- NDT & Inspection – Intertek
- 3rd Party E&S Monitoring Consultancy Assystem.

Audit findings are systematically monitored through an Action Tracking Register and communicated to contractors via Non-Conformance Reports (NCRs).

2.3.4.6 Third-Party Environmental Monitoring

Environment

There are several third-party monitoring companies active in delivering operational environmental requirements. These include:

- Environmental Third-Party Monitoring and Consultancy Services (Assystem Enerji ve Çevre A.Ş.)
- SME Geo-Hazard Surveys (including Landslides, Karstic regions, River Crossings, and Land and Slope erosion) (Fugro Sial).
- Greenhouse Gas Emission Verification Services (The Ministry of Environment, Urbanisation and Climate Change (MoEUCC) allocates a company via the Central Electronic Verification Agency Appointment System (MEDAS))

Additionally, TANAP underwent an IMS re-certification audit in March 2025. There were no non-conformities identified, and the certificates were reissued for ISO 9001:2015, ISO 45001:2018 and ISO 14001:2015. This means that TANAP has been continuously certified since March 2016.

Social

Annual independent ESIA monitoring by a Third-Party Monitoring Company (TPMC) is required under TANAP's Social Monitoring Plan for Operations (TNP-PLN-SOC-GEN-014). The third-party monitoring during Operations is conducted by ASSYSTEM. The report for the first monitoring of 2025 was issued in August 2025, and that for the second monitoring is to be developed.

2.3.4.7 Integrity Management

RoW Patrolling Inspections

There are 10 RoW Patrol Teams (sub-contracted to BOTAŞ-PTT Anadolum). Each team covers a 150-200 km section of the pipeline, checking for any third-party infringements or interference, soil erosion and on the general surface conditions of the RoW. The KPI target for RoW patrolling is the completion of one complete tour of the pipeline route every 15 days. As such, each team should have high levels of familiarity with their section of the route to facilitate the identification of any new risks to the integrity of the pipe. In 2024, approximately 40,000 km was walked by the 10 teams (with the total distance over 3 years being around 132,724km – or 3.3X the circumference of the Earth). Additionally, up to the time of the site visit in 2025, there had been 2,696 pipeline monitoring system (PMS) alarms that were verified on-site by the RoW patrol teams.

From January to September 2025, the RoW Patrol Teams reported 369 findings. Of these, 123 related to trees being planted on the RoW (a medium priority issue). 52 findings were due to BVS/Station access road damage and traffic sign damage, 25 due to line/aerial markers being damaged, 19 due to fences being installed within the 16 m pipeline corridor. Whilst some findings from Q1 are still open, these are related to lower priority findings which do not justify a team being mobilised specifically to, e.g., replace a line marker.

In addition to tree planting and the installation of fences, the RoW Patrol teams have also identified other land use violations including 22 unauthorised excavations within the RoW. This is thought to be at least partly due to drought conditions in Türkiye in 2025, causing landowners to seek additional groundwater sources and/or extend or lay irrigation pipes. Additionally, it may be the case that changes in land ownership means that new owners may not be fully aware of the rules/restrictions regarding the RoW. The IESC is aware that the TANAP Social Impact Team makes a lot of effort to ensure that landowners are informed of the risks associated with the pipeline, and what they are and are not allowed to do within the RoW. However, it is clear that there needs to be a continuous focus on communicating rules and restrictions to local communities and landowners. Please also see Section 2.9.1.2 of this Report.

Integrity Mapping Platform (IMP)

The TANAP IMP is the central repository for aerial images, permits, as-built data, survey results and information from the QHSE, Engineering, Operations & Maintenance and Security Departments relating to the RoW and stations and provides access to spatial data about the pipeline to all relevant parties. The RoW management process has been fully integrated with the IMP. This includes that each RoW Patrol Team has GPS-supported mobile devices to facilitate the input of GPS data to the IMP during patrols, for the purpose of immediate digitalization. ArcGIS Field Maps have also been customized by the integrity team to collate site data from the RoW patrols, geohazard inspection teams and civil inspectors. The IMP enables the Integrity Management Department to have immediate access to, and analyze, real-time information relating to any identified risks to the integrity of the pipeline, including from geohazards.

Through the IMP, TANAP has been able to present high-precision aerial images and 3D terrain models of the pipeline route produced with photogrammetry. The generation of these images and models has been informed by photogrammetric inspection of the RoW using drones equipped with Lidar features and photogrammetric airplane. At the time of the site visit, repeat aerial photogrammetric surveys of the pipeline route (which are to be undertaken every 3 years and were last conducted in 2022) were on-going, and the repeat lidar surveys had been completed. For the 2025 surveys, new methods have been developed and the scope of work enhanced, including scanning a 500m corridor with the airborne Lidar sensor, the production of higher resolution (+/- 10cm) digital terrain models, detecting high/low vegetation layers and the production of a natural ground model. Additionally, the surveys are assessing the status of river/creek beds to ascertain the impacts of excessive rainfall and flooding experienced in recent years.

External Geo-hazard Monitoring

Geo-hazard monitoring surveys continue to be conducted by the subject matter expert (SME) contractor, Fugro Sial. The monitoring surveys cover the following geo-hazard risks:

- Land and slope erosion
- Karstic regions

- River Crossings
- Landslides
- Other geo-hazards:
    - Soil subsidence at stations
    - Buoyancy
    - Floods, earthquakes, liquefaction.

There has been no change to the risk-based inspection strategy compared to 2024, whereby geo-hazard risk levels are determined according to the findings of the previous surveys, and the frequency of subsequent monitoring surveys is set according to the risk level, i.e. 'Medium risk' sites are monitored on an annual basis, 'Low risk' sites every 3 years and 'Notable' sites every five years. If a site is classified as 'High risk', urgent action must be taken to reduce the risk level to Medium or lower.

It was noted that following the latest annual slope erosion surveys, at the time of the site visit there are no medium or high-risk sites for slope erosion across the Project. The annual landslide surveys were continuing at the time of the site visit, along with the installation of additional monuments and inclinometers (as outlined in Section 2.4.3 of this Report). In addition to the annual karstic regions survey, a detailed inventory of all sinkholes has been established that maps the boundary of each sinkhole and allocates each one a name based on the relevant KP and midline point. The annual river crossing survey was also ongoing at the time of the site visit, to monitor the condition of crossing intersection points.

During 2025, the TANAP Landslide Inventory was comprehensively reviewed and updated to reflect the available high-precision photogrammetry data and the outcome of previous surveys (considering landslide type, size and proximity to the RoW). A 'Landslide Inventory Update Report' was prepared by a geotechnical service contractor and the proposed changes to the Inventory were reviewed and approved by relevant departments within TANAP as part of the MoC process. As a result, 34 new landslides have been mapped, 125 have been remapped, and 268 removed from the Inventory. There are now only 159 landslides in the Inventory. This process has helped to ensure that resources are focused on monitoring those landslides that represent a potential risk to the integrity of the pipeline, as well as achieving associated cost optimisations.

Given the scope and extent of both in person (RoW patrols, SME surveys, and site inspections by the Senior Integrity Engineer for Geohazards) and technical/equipment based monitoring (monuments, inclinometers, Lidar, photogrammetry, ground penetration radar (GPR) and multi-electrode electrical

resistivity tomography (ERT)) that is being conducted at regular intervals, the IESC is confident that TANAP will be immediately aware of any new geo-hazard risks to the integrity of the pipeline, and take appropriate action as necessary.

2.3.5 Assessment and Management of Change

All Management of Change requests are issued to the Environmental Management Team via the TANAP Electronic MoC system. These are reviewed by the team, who can either state N/A or provide an opinion. If the change is material, meetings are held to discuss potential environmental impacts and identify any appropriate mitigation measures that may needed as part of change implementation.

No details of any MoC requests since the previous site visit were provided for IESC review.

2.4 Resource Efficiency and Pollution Prevention and Control (PR3/PS3)

2.4.1 Resource Efficiency

Also see Section 2.4.5 of this Report with regard to the efficient use of materials.

The Environmental Monitoring Plan for Operations (TNP-PLN-ENV-0GEN-008) outlines the KPIs relating to both water and energy consumption, with targets to achieve a 1% reduction in the total quantity of electricity and water consumed relative to the previous year at the TANAP Ankara Offices.

The IESC was presented with data comparing the consumption of water and electricity in 2023 and 2024. This indicated a total reduction in water consumption of 1% (from 2,414 to 2,340m^3), and in electricity of 4.84% (from 791,355 to 753,085kWh), and that TANAP achieved the annual KPI targets.

The reduction in electricity consumption was due to the implementation of 2 key initiatives. The first was the automation of lighting in the Ankara Head Office, whereby motion sensors and timed relays were installed on lighting across all floors, in the kitchens and WC areas, to reduce electricity use out of working hours. Additionally, the number of active light fixtures in common areas was reduced. The second initiative was the automation of the Heating, Ventilation and Cooling (HVAC) system in common areas including that heating and cooling units are automatically shut off after working hours.

The reduction in water consumption was primarily as a result of the installation of sensor fitted taps throughout the office.

As previously stated in the 2024 IESC Monitoring Report, to be able to continue to meet its KPI targets for resource efficiency, TANAP will need to identify and implement new/additional electricity/water saving measures at the Ankara Office on an ongoing, yearly basis. The IESC considers that this will become increasingly challenging as the pool of viable initiatives that have not already been implemented diminishes.

The IESC therefore recommends that TANAP considers whether these KPIs can be revised to be more achievable on an on-going basis and are not linked to an annual % reduction in consumption.

2.4.2 Pollution Prevention & Control

The IESC is comfortable that the operational management systems, Plans and Procedures in place are generally adequate to ensure that any direct negative environmental impacts of TANAP's operations are being avoided/limited.

There have been 6 environmental incidents in the year to date, all of which were related to minor oil spills/leaks. From the incident reports provided for review, it appears that appropriate corrective actions were taken to clear up the spills and dispose of the hazardous waste. The IESC is also comfortable that where further measures were required to prevent recurrences, they will be taken. For example, at Pig Station 6 of CS5/MS2, there was an oil spill (estimated to be approximately 220 litres) in July from a hydraulic valve actuator. Following the investigation, it was determined that there had been inadequate use of the spill kit after the spill, so it was recommended that spill kit use drills should be conducted for both operation and maintenance teams.

TANAP is monitoring and has achieved 100% of target performance for all but one of the pollution prevention KPIs listed in Appendix 3 of the Environmental Monitoring Plan for Operations during 2025 to date. This includes that all planned environmental audits and training were completed, and that no fines have been issued for environmental violations. Additionally, there have been 0 complaints received relating to noise, water quality, waste, dust or odour. There have been no noise tests during 2025 as these are only undertaken as required. Whilst there have been numerous non-compliances with Project standards for wastewater quality in 2025 (as per the data provided for ENV.KPI.0002), there have been 0 instances of tests/samples being non-compliant with legal standards for effluent discharge. It is assumed that the legal standards are less stringent than the Project standards, which accounts for the difference in reporting against KPI targets relating to wastewater quality. There have been 0 spills to water, but there was one spill to land higher than 50 litres, as outlined above Pig Station 6 of CS5/MS2. The target number of spills to land is '0'. However, according to the relevant incident report, appropriate corrective actions have been taken.

The Ministry of Environment, Urbanisation and Climate Change (MoEUCC) allocates a laboratory (via the Central Laboratory Determination System) to undertake the measurement and analysis of air emissions from heating boilers at all compressor stations and metering stations in accordance with the Regulation on the Control of Air Pollution from Heating; including to determine whether they are meeting the threshold values specified in the Industrial Air Pollution Regulation. The results are reported to the related Provincial Directorate of the MoEUCC. There have been no complaints and non-compliances recorded during 2025.

2.4.2.1 Wastewater Effluent Quality

The IESC has raised the issue of non-compliances with Project standards for wastewater discharge quality, from Station biological wastewater treatment plants, in 2022, 2023 and 2024 and, as such, this was a focus of this site visit as it has consistently prevented TANAP from meeting the relevant KPI targets.

The third-party monitoring company Assystem Enerji ve Çevre A.Ş takes wastewater effluent samples on a monthly basis from Stations CS1, MS1, CS5/MS2, MS4 and MCC for analysis by an accredited laboratory, which tests for the full suite of wastewater quality parameters against TANAP's adopted Project standards. Additionally, on a quarterly basis, wastewater effluent analyses are conducted to fulfil legal monitoring requirements by laboratories allocated via the Central Laboratory Identification System (operated by the MoEUCC) in line with the Environmental Permit and License Regulations.

The Project effluent quality standards are not only aligned with the World Bank Group General EHS Guidelines, but with the requirements of the following Turkish Regulations:

- Regulation on Water Pollution Control Regulation (Official Gazette dated 31.12.2004 and numbered 25687).
- Urban Wastewater Treatment Regulation (Official Gazette dated 08.01.2006 and numbered 26047).

During the visit to CS1, the wastewater treatment process was described to the IESC in detail as follows:

1. Mechanical separation of large, solid waste elements (as shown in Figure 6). The solid waste is taken to a municipal waste disposal facility in Erzurum that is capable of processing and disposing of this waste.

Figure 6: Separation of solid waste elements of wastewater during the biological treatment process at CS1

2. The remaining liquid waste enters an initial settlement tank to allow larger waste particles to drop out of suspension.

3. The liquid passes into the aeration tank for 400 minutes.

4. Further settlement for 1 hour.

5. Chlorination for 45 minutes.

6. Effluent quality is monitored at the point of exit from the treatment works.

7. Discharge via an underground pipe leading to an outlet point in a local creek.

The Assystem Annual Monitoring Report for 2024 outlines regular non-compliances with the Project limit values for wastewater discharge quality standards, as summarised in Table 5 by the months during 2024 when limit values were exceeded. As previously observed, there has especially been an issue with the levels of total coliform bacteria at CS1 and MS1.

Table 4 2024 Non-compliances with Project wastewater discharge quality standards

Parameter non-compliance	Station (Month(s))
Total Coliform bacteria	**CS1** (February to November) **MS1** (January to December, but not detected in May) **MS4** (April and August) **CS5/MS2** (February and August) **MCC** (January, April, May, November and December)
Total Suspended Solids	**CS1** (March, August and September) **MS1** (March) **MS4** (July, September and December)
Biological Oxygen Demand	**CS1** (January and June) **MS1** (January) **MCC** (February, March, April, September, November and December)

During the site visit, TANAP acknowledged that there has been an ongoing problem with achieving wastewater discharge standards. Following further investigation, it was discovered that the coliform exceedances were mainly due to the retention times of liquid waste in the chlorination tank being too short – 10-15 minutes instead of 30-40 minutes. Additionally, at CS1/MS1, the low temperatures and low

volumes of liquid passing through the treatment system were exacerbating the problem. A further issue is one of operator turnover, with individuals only remaining in post for 1-2 years, resulting in a lack of consistency in the knowledge and experience of how to operate and maintain the treatment plants effectively. To address these issues, TANAP has increased the retention time in the chlorination tanks, implemented cleaning of the chlorine tanks every 3 months along with optimised chlorine dosing, is checking the condition of the bacteria at least daily and adding sugar to the settlement and aeration tanks if required, conducting daily checks of the mechanical, electronic, float and pump elements of the system, and has repaired the ventilation pipes. The salaries of treatment plant operatives have also been raised in an attempt to retain employees for longer.

The IESC commends the efforts taken by TANAP to understand and address this issue and acknowledges that TANAP has observed an improvement in the total coliform bacteria levels at these Stations. However, this issue will also be a focus of the next site visit, to verify whether the measures outlined above have achieved the anticipated improvement in the wastewater discharge quality from CS1/MS1 during 2025, especially given that the KPI target for 'Non-compliant Emissions' has not been met during any month is 2025 (see Section 2.3.4.5 of this Report). **Until evidence can be provided of a consistent improvement in wastewater discharge quality, and TANAP is better able to meet the relevant wastewater standards and KPI targets, the finding from 2023 (3.3) remains open.**

2.4.3 Geo-Hazards

The 2025 site visit to the most easterly section of the pipeline from MS1/CS1 (which covers from the border with Georgia up to the first 410km of the pipeline), was focused on landslide risks and geo-hazard risks at river crossings. The IESC observed significant evidence of dormant/historic and active landslides throughout the site visit. TANAP is highly sensitive to this hazard and as such, the whole region is closely monitored to ensure that any significant or unexpected ground movement can be detected and interventions implemented if there are any risks to the integrity of the pipe.

The IESC was shown examples of where interventions have effectively mitigated risks identified during monitoring, where there are outstanding works to be completed, where there are potential risks that are being closely monitored, and where geo-hazard control measures implemented during the construction phase have been demonstrated to be highly effective.

MS1 is located in an area surrounded by large and active many landslides. For this reason, in order to detect possible landslide movement in the area where MS1 is located, 10 inclinometers have been installed around the Station, each reaching a depth of 100 meters. (Both the TANAP RoW and a BTC pipeline are in this area) (as illustrated in Figure 7). Given that the possible slip plane of the landslide is at maximum 70 meters, these devices are certain to pick up any significant changes in the level of landslide risk to the

Station. The Geohazard SME contractor Fugro takes readings from the inclinometers on a 6 monthly basis and to date, only negligible levels of movement have been observed.

Figure 7: Inclinometers around MS1

The influence of landslides on the Project and the challenge they have presented to TANAP both during the construction and operation phases was evident at **KP 16+442**, where surrounding active landslides (as shown in Figure 8) have necessitated the pipe being installed along the narrowest ridge on the Project, at only around 15m wide. Additionally, the Shah Deniz pipeline runs in parallel to TANAP along the ridge, as this is the most suitable route through the area, so the available space to construct the TANAP pipeline was very limited.

Figure 8: Active landslide adjacent to the ridge at ~ KP16

Given the prevalence of active landslides in the immediate area, TANAP has installed monuments along the ridge as reference points, to proactively monitor any ground movement, as illustrated in Figure 9.

Figure 9: Monuments at KP 16

Additionally, in 2018 a mortared stone wall wall was installed along the ridge to increase slope stability, as shown in Figure 10. The RoW at this KP appeared to be well stabilised, with good levels of revegetation and no major ground movements have been detected from the monuments in place. As such, there are no concerns regarding soil erosion or that there are any immediate or likely risks to the integrity of the pipeline.

Figure 10: RoW along the Ridge at KP16+442

Following the most recent annual slope erosion surveys (see Section 2.3.4.77 of this Report), it has been determined that there are now no medium or high-risk slopes in terms of soil erosion along the pipeline. This is testament to the effectiveness of the erosion control measures that were installed during the construction phase, and which have been maintained during the initial period of operations. The slope at KP14+900 is a good example of the use of both temporary and permanent slope breakers to facilitate slope stability and minimise/prevent soil erosion. The temporary slope breakers are still evident but are now beyond their design lifespan of 5 years and are no longer required. Furthermore, no maintenance of the permanent slope breakers is being undertaken, as this is not considered to be warranted given that the slope has reached a sufficient level of revegetation and stability, as illustrated in Figure 11.

Leaving the temporary slope breakers in situ helps to retain soil moisture and support vegetation, which at this location is beneficial for grazing animals. It would also be disruptive to remove them, and the use of heavy machinery and disturbance of the slope would potentially result in some soil erosion. As such, TANAP's preference is to leave temporary slope breakers in place. However, it is acknowledged that some landowners would prefer for them to be removed as they present an obstacle to land cultivation.

Figure 11: Well stabilised slope at KP14+900

Alongside managing geo-hazard risks arising from geological conditions, TANAP is also undertaking corrective measures to address issues resulting from suboptimal river crossing design and construction.

For example, at **RVX4 – 5101**, an area of scouring of the riverbed was observed around 2 years ago that subsequently increased from around 1m to 3m in length. The River has a large, mountainous catchment area, and at this location, the river is very flashy with flow velocities of up to around Q100 = 40.28m^3/sec (reference Scour Protection Design Report For RVX4-5101, TMS-REP-OPR-MC1-037). The original erosion control engineering solution – rip rap - was not sufficient to withstand the power of such high flow rates. Additionally, it was not constructed to a standard that could prevent displacement of the rip rap during high flows. TANAP developed an improved design incorporating grouted rip rap (as shown in Figure 12), which should effectively prevent the wash out of backfilled material and ensure the long-term protection of the pipeline.

Figure 12: New scour protection solution at RVX4-5101

Additionally, RVX3A – 0007 was constructed (on the Hanaksuyu Stream) using the open-cut technique and has been reinstated for over 5 years. However, the designed width of the river crossing point and the upstream gradient of the river have resulted in the flow being funnelled into a narrower section of the channel, as shown in Figure 13, with a resulting increase in velocity.

Figure 13: Narrow river crossing point at RVX3A-0007

Whilst there is no evidence of scouring of the riverbed to date, as a result, the river is naturally starting to cut through behind the main channel upstream of the river crossing point (on the right bank). TANAP is planning to widen the river channel at this location to reduce flow velocities at the crossing point and reduce the risk of erosion and flooding.

At MS1 a new drainage channel was constructed around 2 years ago to manage surface run off and high groundwater levels at this site. There are active de-watering boreholes around the Station which discharge into a French drainage system around 2.5m underground (i.e., a gravel filled trench with a perforated pipe at the bottom which redirects the water into the existing drainage system down gradient). The Station had not historically flooded, but there is an uncontrolled creek running along the boundary of the Station, which is normally dry. When it was flowing, it caused the previous drainage channel to silt up and increase the flood risk. TANAP also installed small berms to minimise surface run-off from the slope above the Station and a new culvert to divert water in the creek away from the Station. The new drainage channel, shown in Figure 14, does not silt up and the flood risk at this site has been reduced.

Figure 14: New drainage channel at MS1

There are geo-hazard risks and impacts across the entire Project that must be monitored and managed on a continuous basis, including in those regions where there are active landslides that could present high levels of risk to the integrity of the pipeline. The IESC remains confident that the TANAP Senior Integrity Engineer for Geohazards is fully aware of any current geohazards and is managing them effectively and in a timeframe commensurate with risk levels. This depth of oversight is enhanced by targeted, risk-based SME surveys, aerial surveys and satellite imagery, installed monitoring equipment and the Integrity Mapping Platform.

2.4.4 Greenhouse Gases (GHG)

Prior to the Operations phase, the third-party monitoring company Çınar was appointed by TANAP to jointly review established IFI methodologies for GHG accounting and developed a bespoke methodology for calculating TANAP's annual GHG emissions during operations (TNP-PCD-ENV-GEN-017).

The most recent GHG Emissions Report for 2023 is dated 24 February 2025 and covers operational GHG emissions of 2024. Scope 1 and 2 emissions have been calculated using the methodologies outlined in the document referenced above. Scope 3 emissions (arising from sources not operated by the Project) are not typically included in annual reporting exercises and are excluded. Direct Scope 1 emissions sources that have been included in the calculations include stationary (e.g. gas turbines, boilers, heaters) and mobile (i.e. fleet vehicles) combustion emissions sources, vented emissions and fugitive (unintentional leaks from sealed surfaces and threaded components, including piping and associated equipment components) emissions. Indirect Scope 2 emissions were calculated according to the electricity consumed by each operating facility (as these account for the GHG emissions from the generation of electricity that is consumed by the Project).

According to this Report, the total annual GHG emissions resulting from the operation of TANAP in 2024 were **336,800.85** tCO2e, compared to 354,408.91 tCO2e in 2023. This represents an overall annual decrease in emissions released of 4.9%.

Emissions from stationary natural gas combustion only increased by 0.98% compared to 2023 due to the flowrate of natural gas into Europe remaining more or less the same. GHG emissions from stationary diesel consumption increased by 1.72% (on top of a 77.4% increase in 2023), again due to frequent power failures in rural areas and the need to use backup diesel generators to ensure continuous operations. GHG emissions also increased by 18.75% for mobile combustion due to the use of vehicles for site visits and maintenance activities. Vented GHG emissions increased by 25.35% compared to 2023, primarily due to Turnaround (TAR) operations conducted in August 2024, which required venting the lines as a pre-maintenance step.

In December 2024 actual fugitive emissions measurements were conducted at CS1/MS1, CS5/MS2 and MS4 for the first time by a competent third party. Where minor gas leaks were detected, these were reflected in the data. The remaining fugitive emissions were calculated using a globally recognised GHG calculation methodology. As a result, fugitive GHG emissions decreased in 2024 by 86.50% compared to 2023 and remedial actions are being taken to address any leaks in coordination with the site O&M teams. Additionally. GHG emissions for electricity consumption decreased by 1.2% as a result of stable operational activities and QHSSE initiatives to reduce energy consumption.

There appear to be consistent annual increases in GHG emissions due to the need to use back-up diesel generators during power outages, and the use of vehicles for site visits/maintenance activities. The IESC had recommended that TANAP investigate whether there are suitable, alternative sources of back-up power (such as biofuel generators or solar panels and battery storage) and the potential for using electric vehicles compared to petrol/diesel. TANAP has investigated alternative sources of back-up power and has decided to install dynamic UPS at MS1 and CS1 stations to cover frequent power failures in that area,

which will directly reduce the GHG emissions. The implementation of this process is ongoing and will be reviewed in the next monitoring assessment.

TANAP's GHG emissions calculations were submitted to the (MoEUCC) in parallel with the Lenders. Greenhouse Gas Emission Reports for CS5/MS2 and CS1 were verified according to the Regulation on Monitoring of Greenhouse Gas Emissions and submitted to MoEUCC online via an integrated environmental information system.

It should be noted that TANAP is predicted to have sequestered 22,068 tons CO_{2e} by 2025, by planting trees. This is equal to 6.6% of TANAP's total 2024 GHG emissions.

The IESC considers it a very positive step that TANAP is considering joining the Oil and Gas Methane Partnership 2.0 (OGMP), the United Nations Environment Programme's oil and gas reporting and mitigation programme. OGMP 2.0 is the only comprehensive, measurement-based reporting framework for the oil and gas industry, which aims to improve the accuracy and transparency of methane emissions reporting and is key to prioritising methane mitigation actions across the sector. Over 100 companies, including almost 25% of global natural gas transmission and distribution pipeline companies, have joined OGMP 2.0, including TAP, which is aiming to achieve Gold Standard by 2026.

2.4.5 Waste and Hazardous Materials

In 2025, following the successful implementation of a pilot project at CS5, a new materials management/supply chain system, 'KARDEX', is being rolled out at CS1, CS3 and MS4. KARDEX records all materials being used and ordered, and material expiry dates, to help minimise waste generation through stock optimisation. The system reduces packaging and helps to prevent over-ordering, resulting in improved resource efficiency.

2.4.5.1 Non-Hazardous Waste

At source, waste segregation was facilitated by the provision of dedicated waste bins for different waste streams within the offices and around the Station. These are all clearly labelled according to the Waste Management Procedure and mostly contain the correct types of waste.

All non-hazardous waste is temporarily stored in the dedicated Central Waste Accumulation Area (CWWA) at CS1, as shown in Figure 15, prior to collection by third-party licensed waste contractors for recycling or disposal.

Figure 15: Temporary Waste Storage Area at CS1

Different waste streams are being stored separately in locked, covered units with impermeable floors and closed drainage. There are signs indicating the different waste streams and housekeeping was observed to be excellent, including that all waste was being well segregated. Weighing scales are also provided to enable the volumes of waste generated to be ascertained.

2.4.5.2 Hazardous Waste

Hazardous waste management was generally observed to be in line with best practice. Within the CWAA hazardous waste is being stored in two clearly labelled, locked, covered units with compatibility matrices displayed on the main doors. Containers are clearly labelled to indicate the type of hazardous waste, and all liquid waste is being stored within adequate secondary containment. Around the Station, any hazardous waste was placed within clearly labelled ‘hazardous waste’ bins and spill kits are provided as necessary, as shown in Figure 16.

Figure 16: Hazardous waste bin and spill kit at CS1

The only minor observation was that a spill kit is only provided in one of the two hazardous waste units within the CWAA, despite there being liquid waste in both units.

2.4.5.3 Hazardous Materials

Also see Section 2.3.4.55 of this Report.

The management of hazardous materials observed within the dedicated chemical storage warehouse at CS1 was exemplary. The warehouse was locked and clearly signed to indicate the contents, in both Turkish and English. A chemical compatibility matrix was also displayed on the door of the warehouse. The warehouse was well ventilated, with an impermeable floor and closed drainage system. There was a clearly labelled, appropriately stocked spill kit provided (as shown in Figure 17), and all spill kits at the Station had an up-to-date register of the contents inside the lid that identifies any materials that have been used and/or need to be replaced.

Figure 17: Spill kit within the chemical storage warehouse at CS1

Material Safety Data Sheets (MSDSs) were easily accessible in a dedicated folder, and when asked, the responsible employee was able to locate the correct MSDS for a specific type of oil being stored very quickly. All containers were clearly labelled as to their contents. All hazardous liquids were being stored with adequate secondary containment (as shown in Figure 18) Additionally, the storage of nitrogen cylinders was observed to be extremely well managed. These were being kept in a dedicated, locked, covered storage unit that was clearly labelled, and were all adequately chained together.

Figure 18: Secondary containment of hazardous liquids at CS1

Conversely, the temporary storage of anti-freeze tanks at different locations around the Station did not demonstrate best practice hazardous materials management. Large anti-freeze tanks were being stored directly on the ground, with no secondary containment, and at least one of the tanks was observed to be leaking (as shown in Figure 19). Although there is a closed drainage system down gradient of where the tanks were being stored, a significant leak would have necessitated the engagement of a third-party contractor to clean the drainage system and remove the hazardous waste. Such a scenario would be preventable through the proactive implementation of appropriate secondary containment measures. This is non-compliant with the requirements of the TANAP Pollution Prevention Plan for Operations (TNP-PLN-ENV-GEN-009), which specifies that:

- All containers of fuel, lubricant oil and chemicals will be stored on containment bund. The bund will be of sufficient capacity to contain as a minimum 110% of the volume of the largest tank;
- If the containment bund is not practical, then dip trays will be used to store chemicals and fuels;

The internal ‘Environmental Compliance Review Report’ for CS1 (dated August 2025), also identified the issue of anti-freeze tanks being improperly stored at the Station with ‘no spill tray’. The corrective action (*All liquid chemicals should be placed over a spill tray*) was allocated a deadline of October 2025.

Figure 19: Leaking anti-freeze tank at CS1

As the issue has been identified on 2 separate occasions and was not rectified following the internal environmental compliance review (which would have been relatively easy and quick to achieve), a non-compliance (3.4) will be raised. TANAP must ensure that all hazardous liquid containers are placed within adequate secondary containment, even if they are only being stored on a temporary basis.

2.5 Labour and Working Conditions (PR2/PS2)

2.5.1 Human Resource Policies and Working Relationships

TANAP has a Human Resources Policy [TNP-POL-HRM-GEN-006] and HR Management Plan [TNP-PLN-HRM-GEN-001] in place as part of the operational organisational management, for which implementation is the responsibility of the Human Resources Directorate. Subordinate documents guide policy implementation and include aspects such as the Discipline Procedure, the Operational Training and Competence Philosophy, the Performance Evaluation Procedure, the Recruitment and Mobilization Plan, and the Termination Procedure.

As of October 2025, there are 389 direct employees for the below-listed segments. The following table describes the breakdown of the workforce.

Table 5 Breakdown of the workforce by type and gender

Employee Type	Gender	Number
TANAP	• Men • Women • Total	• 85% • 15% • 389
RoW patrolling (contractor)	• Men • Women • Total	• 100% • 0% • 50
Administrative (contractor)	• Men • Women • Total	• 75% • 25% • 209
Security (contractor)	• Men • Women • Total	• 91% • 9% • 223

2.5.2 Protecting the Workforce

The Human Resources Management Plan provides TANAP's wages, benefits and working conditions policy of offering competitive salaries within the market and benefits to employees, as well as operating in compliance with legal requirements.

Social Inductions/Refresher trainings have continued to be organised for workers by the Site Social Impact Specialists, on content including TANAP's Social Commitments; Turkish laws on working conditions; worker rights and entitlements; and the grievance mechanism.

2.5.3 OHS

2.5.3.1 General

The IESC took a focused, risk-based approach to the assessment of OHS. Previous assessments and findings were assessed and validated as part of this physical assessment, however, there were no opportunities to observe high-risk work being conducted in the field. This is not unusual given the nature of operations as opposed to construction.

TANAP OHS statistics remain industry best practice with no recordable incidents for the period under review resulting in a 0 LTIFR and TRIFR (Figure 20, Figure 21). Near-miss incidents totalled 36 for TANAP employees and contractors (12 more than last year) for the review period and did not represent any failings in core OHS systems or procedures. Generally, an increase in the number of recorded near miss incidents indicate a positive trend as it shows company culture is focused on capturing as much OHS data as possible. Many of the near misses recorded for TANAP would likely not be recorded on other projects as they are too minor. The diligence in recording near-miss events shows company-wide commitment from employees to keep OHS in mind and continuously look for areas of improvement.

TANAP has a robust internal audit process with the frequency of assessments, findings, actions and action register all very well implemented and managed. The close-out rate of corrective actions identified during internal OHS audits can be seen in Table 6 below. The IESC commends the impressively high closure rate of actions, which was 97.3% at the time of the field visit.

Table 6 The close-out status of the action items identified during audits between September 2024 – August 2025

HS Audits	Non Conformances		Conformities
	Open	Closed	
ERP Readiness Audit	0	5	105
Health Audit	0	8	112
Chemical Substances Management Audit	4	19	52
Personal Protective Equipment Inspection and Audit	0	0	60
General HS Site Inspection	0	6	69
Contractor HS Compliance Audit	0	8	356
Road Safety Audit and Inspection	44	89	427
Permit to Work Audit	7	16	667

2.5.3.2 Incident reporting and management

The incident register was reviewed and is to be commended with zero recordable incidents among TANAP employees for the monitoring period. There were no High-risk near misses for the period under review and as noted in this report, the lagging safety statistics for this project are excellent and industry best practice. Lagging safety statistics are presented below and actual LTI frequency and total recordable injury rate are below the respective targets of 0 and 0.3 for the entire monitoring period (Figure 20 and Figure 21).

Several minor medical treatments and first aid injuries were recorded among TANAP contractors over the monitoring period; however, it is an extremely low number for a project of this size. A complete list of the incidents recorded for this monitoring period is shown below:

- Fatality - 0
- Lost Time Injury - 0
- Medical Treatment Injury - 3

- First Aid Injury - 4
- Near Miss - 36
- Road Traffic Accident – 8
- Property Damage - 10
- Tier 3 Gas Leak - 3
- Tier 2 Gas Leak - 0
- Tier 1 Gas Leak - 0

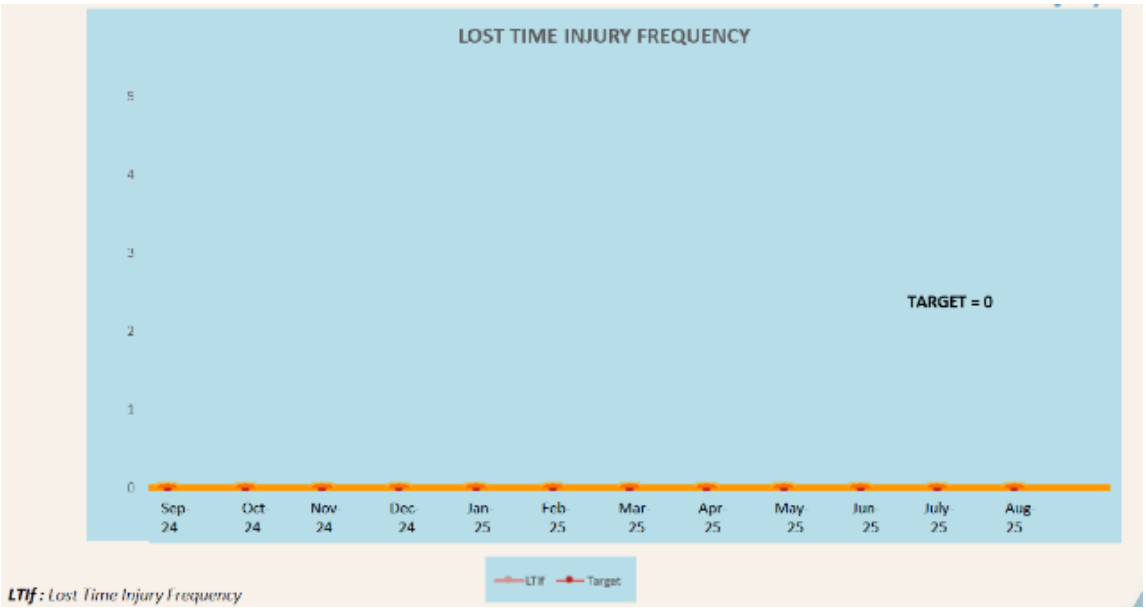

Figure 20: Lost Time Injury Frequency

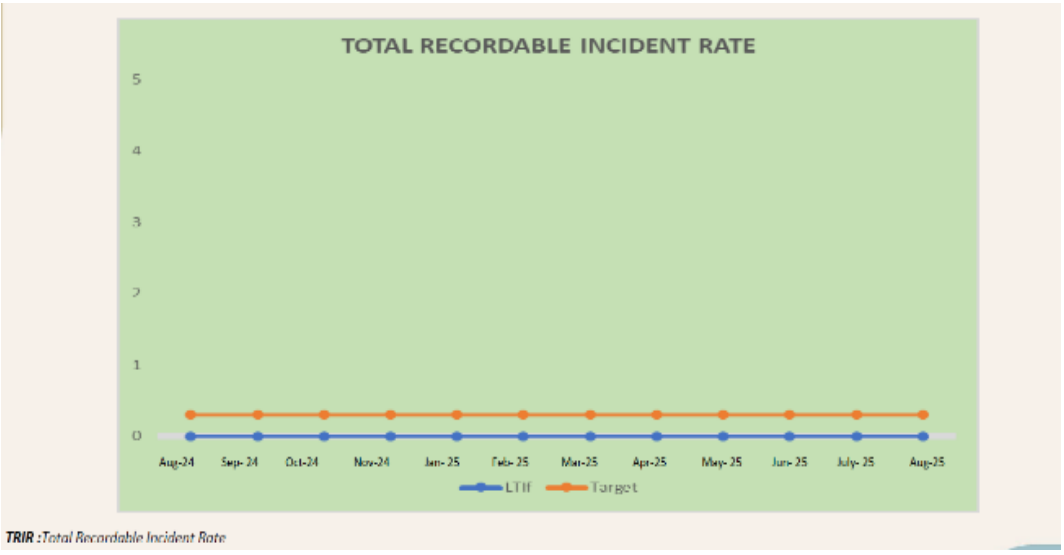

Figure 21: Total Recordable Incident Rate

2.5.3.3 OHS Training

TANAP maintains a comprehensive training register for all employees, contractors and visitors on the project. This register tracks the training requirements of over 4,000 employees and contractors across all project areas and activities. Training requirements for each employee can be determined based on the position-based training matrix that includes the validity of each training over time and when refreshers need to be conducted.

Training currently being tracked in the register by TANAP includes:

- Compulsory Health and Safety Training;
- Health Training;
- Employee representative Training;
- Health and Safety Committee Training;
- Post-Accident Training;
- Risk Assessment Training;
- TANAP Health and Safety Inductions (this includes both general induction for each site as well as specialised red zone inductions for high-risk areas);
- Permit to work Training (Including specialised courses for area authority, performing authority, isolation authority and authorised gas tester);
- Emergency response training (including basic fire training, advanced firefighting, first aid, emergency response and incident management);
- High risk activity training (including control of work, confined space, working at heights, lifting operations, excavation safety and risk assessment);
- Safety Observation training;
- Incident investigation training;
- TANAP's golden rules of safety training, and
- Naturally Occurring Radioactive Material Training.

According to the register, TANAP employees and contractors have conducted over 30,000 training sessions since 2020. This level of diligence by TANAP to ensure all workers have the skills to conduct work safely is likely a significantly contributing factor to the consistently low incident rate.

2.5.3.4 Road Safety

Road safety remains one of the highest OHS risks for the operations and the road safety management initiatives are highly commended as is the level of validation.

The IESC team did not observe any unsafe driving or road practices during the site visit from any of the drivers. Speed limits were strictly adhered to and off-road driving was conducted in a safe and cautious manner. Many hours of driving were undertaken, and all drivers remained focused with breaks at least every 2 hours. This gives the IESC a high level of confidence that driving safety is a high priority in the broader organisation.

TANAP has in place journey management plans, vehicle tracking and road safety alerts that together ensure that drivers will be aware of any potential hazards as part of driving operations. Based on the incident register, only 8 vehicle-based incidents occurred involving TANAP, contractor and sub-contractor vehicles, many of which were due to 3rd party fault. All incidents were relatively minor and none resulted in injuries. This is a very low rate of vehicle incidents considering the amount of vehicle operations on the project, and is commended.

Other road safety initiatives were completed by TANAP as follows:

- Road safety Training for all relevant employees every 1.5 – 3 years
- Safe-pass Checks of Vehicles
- Vehicle Tracking and Journey Management
- Road Risk Analysis
- Road Safety Audits
- Driver Behaviour and Violation Reports
- Spot-check of Vehicles and Drivers
- Road Safety Alerts
- Weekly Road Safety Awareness Topics
- Road Safety Toolboxes

2.5.3.5 Physical verification of OHS compliance at CS1

A physical assessment of OHS compliance was conducted at CS1 including a walk-through of the facility. The site had a very high level of housekeeping and general OHS considerations were beyond international best practice. Findings included:

- All fire extinguishers assessed were inspected within the last 6 months
- Eye wash stations were available and clearly marked
- PPE requirements were clear and were being used
- High-risk zones were clear and fenced off
- Emergency protocols were clear and appropriate
- Station was clean and free of tripping hazards and other possible aspects that could cause injury.

The IESC commends the extremely high quality of OHS signage, labelling, storage, and organisation.

2.5.3.6 Assessment of Permit to Work Procedure

During the CS1 visit the IESC discussed the permit to work procedure with the head site engineer and support staff. Items assessed included:

- General permit to work procedure and tracking
- High risk permits (confined space, working at heights etc.)
- Management of change: How are permits managed when an unforeseen change occurs on site during work?
- Isolation / lockout procedure

TANAP CS1 leadership staff demonstrated a detailed understanding of the permitting procedure on site and were able to explain the process for all scenarios posited by the IESC. Permit requirements for each job at TANAP sites are determined during a risk assessment meeting prior to the work commencing. There is at least one ‘performing authority’ team member of each work crew that is approved to open and maintain work permits. The performing authority is present at all times during work and is trained to manage any changes to work that may require the review of a permit. Permit packages and all associated documents

such as JHA's, SWMS and high-risk work permits are kept at the work location with the workers with a copy in the site office.

The IECS was unable to find any potential gaps in the permitting process on site and has high confidence that TANAP OHS policy is being understood and followed by the workers on the ground.

2.5.3.7 Worker Interview

During the CS1 site visit, an OHS interview was conducted with a group of workers engaged in facility maintenance activities. The team included three mechanical contractors as well as a TANAP lead acting as the performing authority. The team was able to explain the work being conducted on site as well as produce all of the relevant permitting and OHS documentation that has been filled out accurately. The team demonstrated a high level of competence and knowledge regarding site safety protocols as well as the permit-to-work process in detail. The permit package contained all necessary documentation readily available, including printed Material Safety Data Sheets (MSDS) and a Job Hazard Analysis (JHA), general work permit and additional high-risk work permits. The team was aware of emergency protocols and were able to describe the actions they would take in the event of an emergency. The team also identified relevant hazards associated with their task and the specific controls in place to mitigate these risks.

As this was an unplanned interview the IESC was impressed with the awareness of OHS procedures that the team displayed. No gaps were identified in their knowledge and management of safe work practices, and this is commended.

2.5.3.8 Chemical Storage

In the 2023 and 2024 IESC assessments, one item that was found to be lacking was chemical storage at MS4 and CS3/AMC, which suggested a company-wide OHS gap. Several instances of flammables, poisons and corrosives being stored together were identified. A chemical storage matrix was available on the door of the storage container, which states these chemicals should not be stored together. However, it was not easily identifiable as the hazard symbols on the matrix did not match the hazard symbols on the containers.

In the 2024 – 2025 monitoring period, TANAP has undertaken a full chemical substances management audit across all of its sites to address incompatible hazardous chemical storage. One result of the audit was the development and installation of a new hazardous chemical storage matrix across all individual storage areas (**Figure 22**). The new storage matrix has been updated to include all possible chemical types and instruction on how they must be stored. The hazard symbols on the matrix now also match the international hazard symbols found on hazardous chemicals.

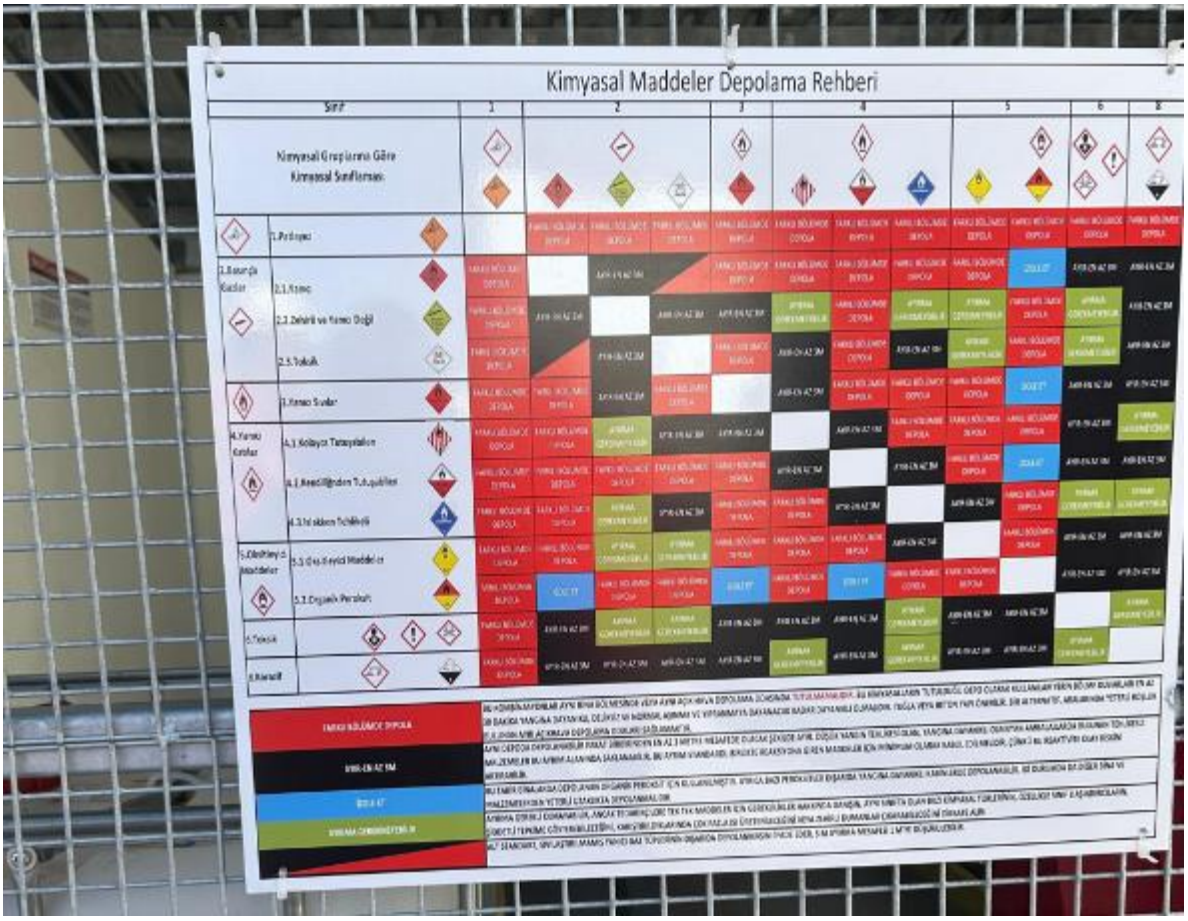

Figure 22 New Hazardous Chemical Storage Matrix developed and Implemented by TANAP at all facilities in 2025

In addition to this TANAP have developed an online chemical tracking system that registers the specific storage location of all chemicals entering TANAP facilities. The tracking system determines both which storage area a chemical is to be stored in as well as the specific container within the area. This storage container is designated only for the storage of certain chemicals in line with the chemical storage matrix above (**Figure 23**). The result of this is that TANAP has now eliminated the risk of potentially dangerous chemical reactions within its storage areas that may have caused significant safety incidents.

The IESC highly commends the effort TANAP has undergone to adhere to international best practice in this regard. It shows continual effort and desire to improve project compliance in all aspects and reduce risk to the environment and employees. It is rare that projects of this magnitude have the systems in place to be able to implement changes to procedures and behavior within such a short time. This partial compliance has now been closed.

Figure 23 Example of a hazardous chemical storage cabinet adhering to the storage matrix

2.5.3.9 Crises and Emergency Management

TANAP continues to adhere to a high standard in scheduling and conducting emergency exercises, which is commended. Twenty-one emergency response exercise reports were sampled, and these represented a good variety of scenarios and locations. This included scenarios that were conducted with the local community and local emergency services, such as the Fire Department. The emergency response exercise program for 2025 was an industry best practice and is highly commended.

The variety of drills conducted for the project demonstrated a comprehensive and diverse approach to safety and preparedness. Each drill targeted different potential hazards, from medical emergencies and fire incidents to environmental risks and structural dangers, ensuring that the team was well-trained to respond effectively to a wide range of scenarios. This diverse training not only improved individual response times but also reinforced a strong culture of safety and readiness, critical for mitigating risks in various challenging situations. Some of the types of drills conducted are as follows:

- Various fire response drills
- Environmental incident drills
- Emergency awareness drills

- First aid drills
- Rescue drills
- Extreme weather drills
- Night works drills
- Earthquake drills
- Vehicle accident drills
- Evacuation drills
- Gas leakage drills

2.5.4 Grievance mechanism

The Grievance Management Procedure [TNP-PCD-SOC-GEN-001-Rev-P6-0_GRM] is operational and sets out the process and responsibilities for handling and monitoring grievances from stakeholders (internal and external). Since December 2024, no new worker complaints have been registered.

2.5.5 Security Personnel Requirements

This aspect was not assessed as part of the visit.

2.6 Community Health Safety and Security (PR4/PS4)

2.6.1 Infrastructure, Building, and Equipment Design and Safety

The IESC observes that security personnel are capable of detecting actual and potential infringements along the entire pipeline length and at all AGIs. With assistance from the RoW Patrolling Team and key stakeholders (including Muhtars), the maximum response time to any pipeline location continue to be approximately 45 minutes. This arrangement continues to function effectively despite the replacement of approximately 80% of Muhtars following recent elections. The majority of these replacements where previously within the community leadership structure and are familiar with the Project mechanisms. Updated contact information has been disseminated by the Social Team to all relevant internal departments. The Muhtars who the team met with during this visit, confirmed the ongoing coordination between them and the Project.

2.6.2 Hazardous Materials Safety

This aspect was not assessed as part of the visit.

2.6.3 Traffic Safety

The IESC notes that good road safety management practices remain in place for the operation period. Refer to Section 2.5.3.2 for further information regarding road safety.

2.6.4 Exposure to Disease

This aspect was not assessed as part of the visit.

2.6.5 Natural Hazards

This aspect was not assessed as part of the visit.

2.6.6 Emergency Management

Yearly refresher training regarding the Community-Based Emergency Response Plan (CBERP) continues via community informative meetings in all settlements throughout the pipeline. Awareness efforts remain active in Above Ground Installation (AGI)-affected settlements via community informative and disclosure meetings.

In 2025, TANAP conducted Community-Based Emergency Management Plan (CBEMP) training as part of its commitment to emergency preparedness. On 11 March 2025, a Fire Safety and Extinguishing Training session was conducted in cooperation with the Eskişehir Metropolitan Municipality Fire Department. The session was delivered to 24 residents from the Aksaklı and Büyükdere neighbourhoods, which fall within the CS5 & MS2 area. The curriculum covered general fire safety, basic extinguishing techniques, specific methods for stubble fire prevention, and a detailed overview of TANAP's emergency response procedures. Additionally, a full-scale community-based emergency drill was scheduled for Q4, 2025.

TANAP has shown consistent effort in conducting high-quality emergency management training for relevant communities during the operational phase. There have been no recent non-compliances in this regard, and the IESC is confident in TANAP’s ability to continue informing and preparing communities potentially at risk for emergency events.

2.7 Land Acquisition, Involuntary Resettlement and Economic Displacement (PR5/PS5)

2.7.1 Status

The total number of parcels subject to land acquisition is 29,256. Of the 7,882 public parcels, 99.85% have been registered in the name of the LRE. Of the 21,330 private parcels the registration of 99.91% has been completed. A total of 43 parcels; 15 of which are public, have been additionally acquired from August 2024 to August 2025. The majority were acquired for various reasons including scour protection on the river crossing, improvement of drainage channels, access roads, land consolidation and modification activities along the ROW.

In addition, there have been 31 expropriation requests related to orphan land. Of these, 10 have been found to be eligible and have been acquired. There is also additional land being acquired due to planned works relating to rip rap installations, slope breakers, drainage channels and land consolidation. Due to complaints related to slope breakers that are currently being examined, additional unplanned acquisition of parcels will also be required. Lands associated with slope breakers are being monitored and assessed by a geo-hazard consulting company in coordination with the Land Acquisition, Integrity, Environmental and Social Impact departments. Additional data has also now been obtained in the form of Lidar and aerial photography. Upon final assessment and confirmation, the additional land acquisition process will be conducted.

2.7.2 Compensation

The original expropriation has now been completed. All compensation payments have been made by the Land Rights Entity (LRE), the entity designated to manage and execute all land acquisition activities and deposited in an escrow account per parcel in compliance with the Expropriation Law.

2.7.3 Grievance

See Section 2.9.2, which includes grievances related to RAP/LRPs.

2.7.4 Resettlement and Livelihoods Planning and Implementation

Additional land acquisition for operational works is ongoing, with a current focus on expropriation of land for slope breakers as mentioned in section 2.7.2. Previously, about 40 complaints relating to slope breakers were investigated by the consultant, Temelsu. The land on which slope breakers are located was only permanently acquired in two cases. However, 3 complaints relating to slope breakers remain open. Currently, a total of about 1,000 private parcels associated with slope breakers are being considered. For some of these, a 5-year loss of agricultural compensation has been paid. TANAP is committed to compensating as relevant and will also consider lost livelihoods and associated incomes as needed related to physical land disturbance, access limitations, drainage pattern alterations and soil structure changes.

Corrective Action 1: Expropriation: Outstanding payments

Outstanding compensation payments within the TANAP project's operational phase currently fall into two principal categories:

- Cases where compensation amounts are disproportionately small relative to the administrative burden required for collection; and
- Situations where the cost of obtaining requisite landowner documentation exceeds the value of the compensation itself.

The Ziraat Bank escrow system required all registered co-owners of a land parcel to present themselves simultaneously at the designated branch to claim compensation. In the context of Türkiye's agricultural regions traversed by TANAP, land ownership patterns frequently involve multiple co-heirs resulting from generational inheritance fragmentation. For parcels affected by minor operational impacts such as temporary access for maintenance activities, localized subsidence, or small-scale stoniness issues, individual compensation amounts can be relatively modest, coordinating the simultaneous physical presence of all registered co-owners at a single bank branch location presented substantial logistical challenges, particularly in rural areas.

In response to this issue, TANAP wrote to BOTAS regarding the agreement between BOTAS and the Ziraat Bank. While a complaints system exists, community members often do not use it or the toll-free hotline, which is not toll-free from mobiles, possibly because the compensation amount is too small. Recognising the risk of uncollected funds (expropriation payments) reverting to the Ministry of Finance, TANAP and BOTAS contacted the non-compliant bank branches and launched a community awareness campaign, confirmed by the IESC, to inform PAPs of the correct claim procedure. This includes informative posters outlining the procedures to collect compensation.

The second barrier to compensation collection relates to the administrative documentation requirements required to claim compensation. However, for co-owners to receive the expropriation payment, only the following documents are required: the certificate of inheritance, the Turkish national identification card (T.C. ID card), and the court decision reference numbers. There is no requirement for notarization, service fees, or any other additional expenses related to this process.

2.8 Cultural Heritage (PR8)

2.8.1 Assessment

The first archaeological study to be undertaken during the Operations Phase was conducted in relation to the new Maintenance Department workshop that is being constructed at CS5 - outside of the existing Station boundary, in an area that is known to be sensitive for archaeology. To ensure that there would be no negative archaeological impacts as a result of construction activities, an extensive series of trial trenches was excavated in the new workshop construction area under the supervision of qualified archaeologists, to investigate the potential for any undiscovered cultural heritage assets. However, no finds were encountered, indicating that it was unlikely that the construction project would result in negative impacts on cultural heritage.

2.8.2 Consultation

This aspect was not assessed as part of the site visit.

2.9 Disclosure and Stakeholder Engagement (PR10)

2.9.1 Stakeholder Engagement

Stakeholder engagement activities for the Project have continued at an adequate frequency and with structured content throughout the 2024–2025 operational period. Engagement efforts span both AGI-affected and pipeline-affected settlements, with information provision, consultations, and targeted communication with local authorities, muhtars, landowners, and public stakeholders. Communication methods include face-to-face meetings, written notifications, telephone updates, distribution of brochures and posters, and updates to the Project website. Key focus areas are land use conditions, operational safety topics, third-party infrastructure crossings, upcoming maintenance, and the continued availability of the Project's grievance mechanism.

In the MS3/MS4 operational area (Northwest Türkiye), the Social Impact Team conducted 40 notifications related to operational land use conditions, 21 notifications or warnings about land use violations, and 14 additional engagement visits to discuss current activities and project issues. Stakeholders engaged included muhtars, landowners, sub-governors, agricultural managers, education authorities, municipal officials, health authorities, forest authorities, water authorities, irrigation cooperatives, and relevant institutions.

In CS5/MS2, 138 land use notifications, 40 violation warnings, 18 third-party crossing consultations, 36 maintenance notifications, 95 authority visits, 103 community health and safety briefings, and 31 other engagements (including grievance handling and information requests) were documented in 2024–2025.

The Annual Stakeholder Meeting was held in Edirne on January 21, 2025, with specialist-led presentations on operational compliance, permit processes, engagement methods, and sustainability initiatives. These

large-scale meetings included various representatives from the public sector, civil society, and local institutions, supporting broad-based and transparent disclosure.

Topics featured in engagement sessions included operational land use conditions, requirements and procedures for third-party infrastructure crossings, advance notifications regarding maintenance periods, routes, and risks, as well as health and safety measures and emergency preparedness. Priorities were identified based on both routine feedback and data from the grievance mechanism. For example, periodic fire safety and emergency response trainings and drills were delivered with local authority and fire department participation, enhancing both awareness and preparedness at the settlement level.

Contact details for all new mukhtars and officials, following major local elections, were collected and disseminated to internal teams to sustain outreach effectiveness and minimize disruptions caused by personnel turnover.

2.9.1.1 Social and Environmental Investment Program (SEIP)

The SEIP is organized into two main components:

- Socio-Economic Sustainability Grants: These grants provide continued funding to community projects initially piloted during construction, enabling their long-term viability and amplifying their benefits for vulnerable populations. Selection criteria include workforce impact, cost-benefit efficiency, inclusivity, ecological sustainability, proximity to pipeline infrastructure, and innovation.
- Support to projects in the vicinity of the AGIs: Targeted investments prioritize settlements in close proximity to TANAP's AGIs. Key objectives include improving community health and quality of life, strengthening local ownership, supporting pipeline security, and mitigating operational risks through enhanced relationships.

Projects supported under SEIP in 2025, included:

- Common Health Initiatives: In villages such as Eskikılıç, İkizdere, and Türkgözü, integrated "One Health" projects were developed to improve both livestock and community health. Activities included animal health screenings, veterinary training, infrastructure upgrades for safe water access, and construction of safe waiting areas for children. Indicators for these projects included hundreds of animals screened, water infrastructure rehabilitated, and community-wide training delivered.
- Women's Economic Empowerment: In Biga, a women-led cooperative received SEIP support to sustain and expand agro-tourism and rural dairy production. Tangible outcomes included substantial yields of cow and goat milk and cheese, documented sales, and strengthened local livelihoods.
- Biodiversity and Local Production: The "Strengthening Ecosystem and Production with the Caucasian Bee" project in Ardahan province supported local beekeepers through training, input

provision, and branding. The initiative protected the Caucasian Bee gene pool, improved honey quality, supported marketing efforts, and addressed key challenges identified by participants, with positive effects on income and employment for women and youth.

A Social Return on Investment (SROI) study conducted as part of SEIP monitoring found significant multipliers for TANAP's social and environmental investments relative to similar benchmarks. For example, every Turkish Lira invested in SEIP yielded between 1.81 to 7.86 Lira in social, health, environmental, agricultural, training, or social capital value, demonstrating the programme's efficiency and tangible impact at the community level, and a 4.38 Lira contribution to social value.

2.9.1.2 Land use conditions and violations

The ROW patrol teams continue to report violations and the security team's remote monitoring from the MCC allows the Project to immediately become aware of possible violations along the pipeline. Often the local Muhtar is contacted, or the gendarmerie is requested to follow up on activities that may be in violation of the restrictions. As reported previously the SI team is supporting owners and users to complete the necessary permit application forms and most applications are for constructing irrigation channels. Although the SI team is making considerable efforts to support users with the permit system to keep violations to a minimum, this procedure has varying success along the pipeline. This year a total of 31 Third Party Crossing applications were made to TANAP by real persons (landowners, etc., excluding the authorities and legal entities) and these are responded to within 10 days from receipt.

Landowners and land users along the TANAP pipeline continue to receive regular reminders about the specific land use restrictions in place, both prior to and following any observed violations. While the frequency of in-person informational meetings on these restrictions may have decreased in some sections, the project has maintained high levels of information dissemination by distributing brochures and posters across affected communities. In many villages, these materials remain visibly posted in public areas, supporting wide stakeholder awareness of the restrictions, even if there is not universal approval of their scope or enforcement.

The Social Impact (SI) team actively assists landowners and users in navigating the Third-Party Crossing permit process, which remains a common area for confusion and non-compliance. Most permit applications submitted by individuals are for activities such as constructing irrigation channels. While the SI team's support has been invaluable in reducing the overall number of violations, challenges with permit system understanding and adherence persist in some segments of the pipeline, and success rates continue to vary regionally.

2.9.1.3 Maintenance activities

Maintenance activities increase in the summer period, and TANAP's SI team reports that their work includes the provision of information about the type and duration of maintenance work. Maintenance work includes line marker repairs/installation and pipe locator readings (i.e. low-impact activities requiring at most hand tools to conduct the work), through to works requiring mechanical equipment (e.g. subsidence repairs). The IESC notes that the land access management procedure (TANAP Operation Phase Land Access Management Procedure (Land Entry, Land Exit and Compensation), TNP-PCD-LAC-GEN-004) is key to guiding compensation and damage as appropriate. The General Principles of this procedure are, reasonably, pipeline-focused, however, a potential vulnerability of households affected by land re-entry/maintenance during operations is not covered in this Procedure. **The IESC recommends that TANAP, in conducting its next review of this procedure, consider what activities TANAP is doing to ensure that any vulnerability in affected households is considered**, in the same way that critical habitat assessment is required for biodiversity. This could be reasonably assessed at the step of "Notification of Landowner/User" and signing of the Land Entry protocol. Any additional support provided to vulnerable households should be appropriate to the nature and the scale of the impact to their affected land, e.g., if work is conducted on the pipeline results in the loss of a subsistence crop that would leave a household more vulnerable, then TANAP could provide special support to ensure compensation is accessible. TANAP should consider thresholds for support, e.g. if works are conducted prior to harvest, or damage more than 50% of a household's crop, or work requires mechanical equipment to be used on the land. The IESC is seeking to 'future proof' the procedure, i.e., ensure that the procedure should documents steps that are already being taken to minimise impacts, particularly steps that minimise impacts to those most vulnerable, as is required under TANAP's commitments to the Performance Requirements[6].

2.9.2 Grievance management

The grievance close-out rate target of 85% was achieved with 87% realization rate. The project's total complaints since operations started is 485. Of these, 436 have been closed. To date, 49 complaints are yet to be closed. Of these, 26 are overdue.

Some grievances from construction remain open and 38 of these are linked to reinstatement. Most of these are about stones and levelling issues. One topic of the grievances that required specific investigation is related to slope breakers.

After a geotechnical investigation in each slope breaker grievance case, the case is either closed with compensation (for temporary cases, relating to the duration the slope breaker has been in place), or where

[6] PR1, inclusion of differentiated measures to ensure disadvantaged or vulnerable groups or individuals are not disproportionately affected. In this case, an example could be the elderly who are meeting food security requirements through subsistence farming.

slope breakers are permanently needed, permanent land acquisition is instigated. See s.2.7.4 regarding permanent land acquisition of slope breaker grievances. There have been no issues raised with this approach by landowners/users.

2.9.3 Information Disclosure

Information disclosure continues as required for Land Use Violations and Community Health and Safety. The land use restrictions are described in writing and in clear pictures to describe various typical scenarios that land users may encounter; TANAP is commended on the clarity of these materials. Materials have been distributed through community informative meetings, to Muhtars, and are also available online[7].

In addition, settlements are periodically informed on the Community-Based Emergency Management Plan to have prior knowledge of possible emergency cases during pipeline operation, TANAP's security and safety measures and steps of emergency management in such cases. Additionally, warnings and notifications are made in cases of project-induced situations, e.g., gas leakage, or third-party-induced situations, e.g., stubble burning.

2.10 Biodiversity (PR6/PS6)

2.10.1 Assessment and Identification of Impacts

TANAP has identified the Project risks and impacts on biodiversity and ecosystem services through its ESIA assessment in the early phases of the Project development. A priority throughout the Project's ESIA process and construction phase has been the avoidance of potentially adverse ecological impacts. This resulted in numerous design modifications and the development of a suite of mitigation measures to prevent many negative impacts, which were implemented during the construction phase. A detailed Biodiversity Action Plan (BAP), Ecological Management Plans, and Special Areas Reinstatement Methods Statements for all terrestrial and freshwater critical habitats were developed and referenced as a guide to minimise impact and to implement the mitigation hierarchy.

The Project's biodiversity assessment studies and mitigation plans were reviewed during the initial Environmental and Social Due Diligence (ESDD) in 2016. The ESDD found that the initial assessments and management planning for biodiversity did not adequately demonstrate a net gain in critical habitat and no net loss of priority biodiversity features due to the assumption that there were no residual impacts to these habitats and features in the initial planning and assessment documents.

[7] https://www.tanap.com/en/land-use-restrictions

Gaps identified in habitat assessments from the ESDD resulted in specific requirements within the Project's Environmental and Social Action Plan (ESAP). The Project adjusted its BAP to better define and consider residual impacts to critical habitat (CH) and priority biodiversity features (PBF) and the need for offsetting where bio-restoration of the RoW could not fully mitigate disturbance impacts. An Ecological Management Plan for Operations (TNP-PLN-ENV-GEN-010) has been written and updated in August 2023. Site-specific Biodiversity Offset Management Plans (Resilient Steppe Offset Plan and Forest Offset Plan) were written in 2022.

Updated versions have been received and reviewed by the IESC.

The 2025 site visit focussed on the eastern section of the route in Ardahan region. The focus of the visit was assessing the revegetation along the right of way, reviewing the results of the biodiversity monitoring program and considering overall progress towards meeting PR6 requirements.

2.10.1.1 Overhead Transmission Line Impacts to Bird Species

The IESC's audit in October 2018 observed that not all mitigation measures recommended by the Overhead Transmission Lines (OHL) and anode bed line ESIA for mitigating potential impacts to bird species were implemented due to the assessment report recommendations being available after design and construction of the powerlines. The IESC recommended (in October 2018) TANAP to include the monitoring of impacts to bird species as identified in the OHL environmental assessment and that the performance of any mitigation measures be included in the post-construction monitoring programs for the Project. TANAP continued monitoring activities at BSV21 only. During the 2023 monitoring five dead birds were found under the transmission line at BVS21 and recommendations were made to install bird diverters on the line to make it more visible.

Following this recommendation, TANAP made a visit to the Regional Power Authority (ÇEDAŞ) in Sivas on the 30th January 2024 to request energy isolation and the installation of diverters. Isolation methods were discussed and agreed upon based on climate conditions in the region. ÇEDAŞ implemented isolation measures at BVS21 OHLs, and resinoid isolation was fitted. An official letter was received on 8 March 2024 to confirm the action. Bird repellents were installed on 23 September 2024. Monitoring was undertaken in spring 2024, and no carcasses were observed; further monitoring was due to be undertaken in October. However, it is not clear what the results of the second survey were. The conclusion of the 2024 bird report suggests that evidence of electrocution was noted. **It is recommended that a separate report be produced for monitoring the OHTL with clear methods, results and conclusions.** This report will be submitted by the end of the year, and TANAP will share a copy with IESC.

2.10.1.2 Residual Impact Assessment

Golder, in collaboration with Çinar, developed a Biodiversity Offset Strategy (BOS) in 2017 with scheduled offset implementation starting in 2019. The strategy did not identify specific biodiversity management actions but identified potential offsets and additional conservation actions in accordance with good international practice to achieve No Net Loss (NNL) or Net Gain (NG) outcomes relative to the residual effects identified for Natural Habitats, Priority Biodiversity Features (PBF) and Critical Habitats (CH). The strategy defined the approach to stakeholder engagement, monitoring and adaptive management, including mechanisms that allow re-calculation of net loss and gains and facilitate adjustments to the offset strategy to achieve the stated objectives.

Further information on the status of the BOS is provided below in Section 2.10.5.3.

Now that the relevant offset plans are in place and being implemented alongside a comprehensive flora and fauna monitoring plan, it would be prudent to reassess residual impacts to benchmark where the project is against its obligations. This is described in more detail in section 2.10.2.2

2.10.2 Biodiversity Management Planning

During the construction phase, TANAP implemented the mitigation hierarchy to a good standard.

With the completion of the TANAP and TAP interconnection pipeline line-fill activity in November 2019, the Project is now in its operation phase. The Project ESIA identified no significant impacts from the onshore and offshore pipeline operation to terrestrial, freshwater and marine water biodiversity species and habitats. Therefore, the main management measures for biodiversity impacts during operation have now shifted to monitoring of the bio-restoration success, and to monitoring the recovery of the critical habitat triggering species in critical habitat areas along the pipeline route.

The operational phase also includes the ongoing development and implementation of the long-term biodiversity offset programmes. These represent TANAP's long-term commitment to achieve No Net Loss (NNL) or Net Gain (NG) for priority biodiversity features or critical habitats, in habitats that are deemed impossible to fully restore.

The Project Operational Phase Environmental and Social Management System (ESMS) includes the following management documents with regard to biodiversity and ecosystem services management:

- Environmental and Social Management Plan (TNP-PLN-ENV-GEN-001)
- Ecological Management Plan (TNP-PLN-ENV-GEN-010) – updated 01/08/2023
- Environmental Monitoring Plan for Operations (TNP-PLN-ENV-GEN-008)

- Biodiversity Action Plan (CIN-REP-ENV-GEN-017-Rev-P3-11, reissued as TNP-PLN-ENV-GEN-016)

Previously, each construction contractor had developed management documents for ecological management and monitoring during the two-year warranty period after the pipeline mechanical completion. This has now been completed, and the two-year warranty period has ended.

2.10.2.1 Ecological Management Plan – For Operations

The Ecological Management Plan for Operations (EMP) (TNP-PLN-ENV-GEN-010) was updated in August 2023. The EMP is the main management document for ecological impacts during the Project operation. It outlines the processes and measures to be implemented to manage ecological impacts during the Project Operational Phase. Its scope includes minimising habitat disturbance, ongoing bio-restoration activities, biodiversity offsetting, invasive species, pest management, and protecting flora and fauna. The key post-construction biodiversity impact mitigation measures will be the continued maintenance of reinstated areas and the undertaking or implementation of remedial bio-restoration activities, in special areas (i.e. ecologically sensitive areas, critical habitats etc.) identified in the BAP. It sets out the KPIs that will be used to track operational performance.

2.10.2.2 Operations Environmental Monitoring Plan

This plan outlines the monitoring requirements of all ecological management activities during the Project's Operational Phase. The implementation of the plan remains the same as when reviewed in 2022 by the IESC team.

The Operations Environmental Monitoring Plan remains the main management tool for TANAP to monitor and document the Project's environmental compliance requirements and identify any issues in the environmental management that need corrective action in a timely manner. TANAP's approach to inspect its environmental impact management measures implementation status, and its processes to assess the management measures effectiveness are summarised in this Monitoring Plan.

TANAP uses the following methods to assess its environmental performance against the Project's environmental commitments during operation:

- Site Inspection:
    - TANAP's site-based QHSE personnel (ROW teams) on an at least weekly basis.
- Audits:
    - Internal audit by qualified and approved personnel at least once a year.

- External verification.
    - IESC's annual audit.
    - Annual Biodiversity Offsetting Evaluation by an independent third party to evaluate the offsetting activities during operation.
    - RoW patrol and maintenance checks by contracted companies to monitor a range of items, including pipeline integrity, conditions of reinstated and biorestoration areas, third-party activities along the RoW etc.
- External Audit to Offshore Pipeline Inspection Contractor.

- Action Tracking:
    - All non-conformances identified by the above monitoring programmes to be registered in the Action Tracking System for follow-up, corrective action, and close out.

The following monitoring in relation to ecology and biodiversity is included in the Operations Environmental Monitoring Plan:

- Annual Physical Monitoring along the entire RoW, giving priority to the environmentally sensitive locations (steep slopes, side slopes, erosion-prone areas, critical habitats, river crossings etc.).
- Annual Vegetation Cover and Diversity monitoring at stratified random sampling locations.
- Annual Flora Monitoring in Critical Habitat areas identified by the BAP.
- Annual Terrestrial Fauna Monitoring in Critical Habitat areas identified by the BAP.
- Annual Aquatic Fauna Monitoring in Critical Habitat areas identified by the BAP.
- Annual Reforestation Monitoring within ROW and reforestation offsetting locations.

The monitoring program is now in its 5th year, and the results to date are being analysed with a view to updating the monitoring approach where necessary. This activity is encouraged by the IESC, and the following steps are recommended.

For each CH and PBF feature, look at the monitoring results for the 5 years and consider whether impacts on these features have been realised and whether monitoring needs to continue. The following points

should be considered for each feature when analysing the project data to date. It is important at this stage to take a holistic view of the project and remember the objectives of PR6.

- Has the feature fully recovered on the RoW to pre-construction levels/locations? If so, then the project can conclude no residual impact and cease monitoring activities at that location.
- Has the feature been observed in some but not all years of monitoring? Can the findings be understood in wider context of the species and potential impacts? Can a conclusion be drawn on residual impacts or is additional data or analysis required?
- Has the feature never been identified during monitoring surveys? Can this lack be attributed to the project (e.g., permanent change in soil conditions) Has this change affected the population? Are there significant residual impacts on this feature and is offsetting therefore required. If this is the case do the current offset projects provide benefits for this species (suitable habitat type in the correct location)

It is recommended that a simple table is developed listing the CH feature, the results of the monitoring, residual impact statement (where possible to conclude), whether objectives of NNL/NG have been met. This table should help consolidate the approach for ongoing monitoring to focus on those features where there is still uncertainty or potential residual impacts.

2.10.3 Implementation of Mitigation

The key biodiversity mitigation measures implemented during the Operations Phase are as follows:

- Completion of reinstatement
- Biorestoration and aftercare
- Invasive species management
- Biodiversity offsetting.

The implementation of mitigation has been discussed in the following sections based on a review of available reports and first-hand evidence collected during the site visit. As the project is in its operational phase and mitigation measures have been implemented, they were not monitored as part of this IESC visit.

2.10.4 Restoration and Rehabilitation

All bio-restoration and reforestation activities have been completed along the pipeline ROW. During the 2025 visit, restored areas where visited along the RoW and bio restoration monitoring reports reviewed to understand how the Project is progressing on this activity.

IESC were informed that a EUNIS habitat survey is due to be undertaken in 2027 to compare habitat types against preconstruction conditions. When this work is complete, it can be used in combination with the CH feature residual impact assessment to provide an interim residual impact statement across natural and critical habitat and PBF.

Where pre-construction habitat type has not been achieved, it will be important to understand why. In some cases, the pre-construction habitat type will not be achievable, for example, forest areas on the PPS. These areas have already been accounted for and offset as part of the Forest Authority's obligations to reforestation/tree planting. Some other areas may not have achieved the target condition but may be on the correct trajectory to achieve this in the future. Others may need specific intervention. Once this analysis has been completed, it will be possible to update the loss-gain calculations and consider whether the offset projects have met objectives in terms of biodiversity gain.

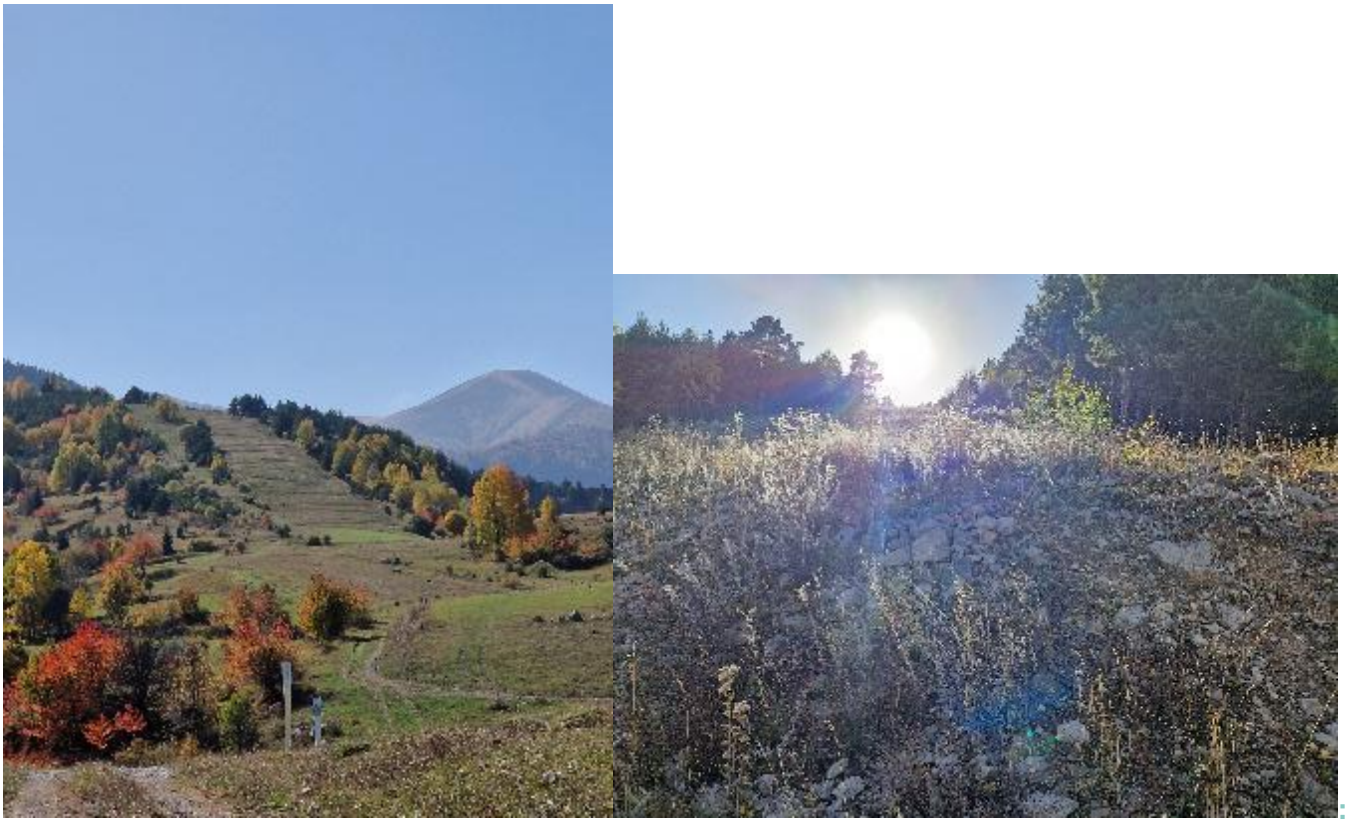

Figure 24: Examples of different extents of restoration across the RoW

2.10.5 Conservation of Biodiversity

2.10.5.1 Critical habitats

TANAP engaged with ENVY for its independent third-party ecological monitoring contractor during construction. Assystem Enerji ve Çevre A.Ş. (ASY) was awarded as the Consultant to perform

Environmental and Social Third Party Monitoring and Consultancy Services during the Operation Phase. The Contract was signed between TANAP and ASY on May 10, 2023.

The main activities to be performed in the scope of the monitoring are described in the Physical & Ecological Monitoring Plan (PEMP). The overall objective of the PEMP is to monitor the success of bio-restoration of the affected areas by the Project as far as practicable to its pre-construction state.

The BAP includes a critical habitat assessment. There are 64 Terrestrial (change from original 67 identified during ESIA phase) and 27 Freshwater Critical Habitat areas that have been identified along the Project RoW in the Biodiversity Action Plan (CIN-REP-ENV-GEN-017) for the Project. No Marine Critical Habitat is identified for the Project. The BAP determined impact mitigation and reinstatement measures, monitoring methods/timing, and impact mitigation achievement, including criteria for all identified Critical Habitats.

The Ecological Management Plan for Operations states that: *As a result of ecological monitoring since 2019, it is recommended by the experts to exclude some of the potential species from monitoring scope not observed during ESIA studies and operational monitoring studies, as given in Attachments 1 and 2. The main reason is these species were not observed during the monitoring studies and there were no suitable habitats in the CH's. In addition, it is recommended to monitor common fauna species in habitats containing critical flora species larger than 1 km in order to evaluate cumulative success.*

The following recommendation was provided in 2024 **It is recommended that this change in scope is provided within the relevant monitoring documentation so there is a clear rationale for the exclusion or inclusion of species and habitat monitoring. Similarly, a review should be undertaken of all monitoring results to date to decipher trends and adjust the monitoring plan accordingly.** It is our opinion that where species have been found consistently over the first 5 years of monitoring the frequency can be reduced. However, it appears this recommendation was not implemented. As described above it is key that the project re-evaluates its monitoring program and considers the actions that may need to be taken based on the monitoring results. It is important to remember that monitoring is undertaken in order that adaptive management can be implemented if species or habitats are not showing adequate signs of recovery. Where a species has been observed regularly in the previous 5 years it is clear that there are no impacts from the project on this species and monitoring is no longer required. Where a species has not been identified further investigation is required into the cause of this change, is this a wider phenomenon or related to TANAP activities. Based on this analysis the project can decide whether the monitoring approach needs to be altered, whether adaptive management is needed to manage the impact on the species or monitoring can be stopped as the analysis shows the change is not project related.

2.10.5.2 Invasive species

The management of invasive species in the Project RoW was identified in the BAP as a significant threat to achieving bio-restoration throughout the Project. Contractor reinstatement plans include control of invasive species (i.e., planting of native plants and trees, consideration of invasive potential and adverse impacts to native vegetation if new plant species are selected) and monitoring. TANAP's Ecological Management Plans specified the Invasive and Pest Species control and management actions to be taken when/if required. Section 3.4.8 of the Ecological Management Plan described how TANAP will monitor and manage the invasive species for the Project impacted areas, particularly in high-risk areas such as critical habitat areas.

As botanical monitoring is an ongoing process, it is still TANAP's responsibility to determine if invasive species are present and the severity or threats that such a species may pose and to take effective mitigation and management measures if needed. If any invasive species are identified in the coming years, then the species and location should be logged in TANAP's Action Tracking System, so that appropriate action may be taken where required.

2.10.5.3 Biodiversity Offset Planning and Implementation

The Project's BAP and BOS provide a framework for TANAP to achieve a net gain in Critical Habitat as defined by IFC PS6 and no net loss of priority biodiversity features as defined in EBRD PR6. TANAP has contracted Golder/WSP to develop the Biodiversity Offset Management Plan (BOMP) to meet IFC PS6 offsetting requirements. Golder/WSP completed the additional studies for the development of the BOMP in 2018-2019.

The following recommendations were provided in 2024:

- Map to EUNIS standards, to inform habitat reinstatement metrics, and update the habitat loss table in the BOS. This can be done after 5 years of reinstatement, then consider year 10, too. It is understood that the EUNIS mapping will be undertaken in 2024 and that drone imagery may be used to supplement the mapping, especially in difficult terrain.

- Implement a scoring system for the right of way, e.g. 1. Target habitat type achieved, no further survey necessary; 2. Target habitat type likely to be achieved, further survey necessary; 3. Vegetation not establishing, remedial action required (seeding/planting). This appears to have been implemented though new KPIs in the Ecological Management Plan.

- Use measurable indicators should also be recorded to evidence change on the right of way, e.g. floristic diversity, percentage cover of vegetation as an example. The aim is that this will be implemented in 2024.

The EUNIS habitat survey is due to take place in 2027. Although the monitoring provides similarity and diversity scores against the off-RoW habitats, it does not provide an assessment as to whether the habitat has yet achieved the desired composition. It is recommended that a habitat condition scoring be introduced as described above.

Three Site-Specific BOMPs have been developed and were shared with IESC in 2024 for review:

- Steppe Offset Plan-Acıkır Gypsum Steppes (Eskişehir)
- Resilient Steppe Offset Plan–Bursa Kütahya Serpentine Steppes
- Resilient Steppe Offset Plan – Hafik-Zara Gypsum Steppes (Sivas)

No site visit was undertaken to offset areas during the 2025 IESC visit. A presentation was provided showing the results of the monitoring to date on both the forest and steppe offsets.

The Resilient Steppes Offset Monitoring Report 2024 presents the results of the second year of steppe offset monitoring. The methodologies used follow the indications of the “Monitoring Protocol for Resilient Steppe Offset Plans” and include:

- target habitats (principal indicators);
- target species (secondary indicators);
- forage production (secondary indicators); and
- carbon sequestration and storage (secondary indicators).

A review of the steppe offset monitoring identified the following:

- Increase in vegetation cover against KPI for all areas
- No signs of significant soil erosion or over-grazing
- Increase in native ground cover
- No target species populations have been lost in the offset project area

These results are really promising, but it should be noted that the KPI’s set were low due to the uncertainty of project outcomes. This uncertainty was due to the ambitious nature of the project as the first of its kind for such a project. Based on these initial results, more challenging targets should be set to ensure success

in the coming years. The focus of the offset projects now needs to be the long-term sustainability with less hands-on involvement by TAP. This approach has not yet been set out, and the IESC expect to see some action on this matter during the next IESC visit.

No site visit was undertaken to a forest offset site. The general idea of the forest offset is the development of a management plan which includes zoning of forest areas into the Strict Conservation Zone and Limited Implementation Zones. The forest management plans have been very well received and are now being used as a blueprint for plans in other regions.

. Monitoring of forest offset focuses on the following:

- target forest habitats (principal indicators);
- focal species (secondary indicators);
- ecological and evolutionary processes (secondary indicators).

In summary, it appears that both forest and steppe offsets are being delivered effectively, and there is support from the parties involved. The offset projects are being discussed in the international context and are being used as examples of good practice where local communities are fully integrated in decision-making, beneficial to biodiversity.

Appendix A: Evidence Register

Document Number	Document Name	Author	Code	Date	Environment/Social /OHS
01	2025 EBRD-IESC Monitoring - CS18M51	TANAP		October 2025	ALL
02	2025 EBRD-IESC Monitoring - ENV	TANAP		October 2025	ENV
03	2025 EBRD-IESC Monitoring - HS	TANAP		October 2025	OHS
04	2025 EBRD-IESC Monitoring - LAC&Permit	TANAP		October 2025	ENV
05	2025 EBRD-IESC Monitoring - Operation&Risk	TANAP		October 2025	ALL
06	2025 EBRD-IESC Monitoring - SEIP	TANAP		October 2025	SOC
07	2025 EBRD-IESC Monitoring - SOC	TANAP		October 2025	SOC
08	ASY_Presentation_TANAP_EBRD_BMP_06102025	TANAP		October 2025	ENV
09	WSP_EBRD_visit_2025_low_Redactedphotos	TANAP		October 2025	ENV
10	Grievance Management Procedure	TANAP	TNP-PCD-SOC-GEN-001	June 2025	SOC
11	Sample Consultation Records_OSID_2025	TANAP		October 2025	SOC
12	Operation Phase Social Impact Monitoring Report-8	Assystem	ASY-REP-ENV-GEN-005-P6-D	August 2025	SOC

Document Number	Document Name	Author	Code	Date	Environment/Social /OHS
13	2023-2024 Social Compliance Review for Operations – CS1&MS1	TANAP	TNP-REP-SOC-CS1-008-P6-0	December 2024	SOC
14	23-2024 Social Compliance Review for Operations – CS3 AMC	TANAP	TNP-REP-SOC-CS3-008-P6-0	October 2024	SOC
15	2024-2025 Social Compliance Review for Operations – CS5&MS2	TANAP	TNP-REP-SOC-CS5-009	June 2025	SOC
16	2024-2025 Social Compliance Review for Operations – MS3&MS4	TANAP	TNP-REP-SOC-MS3-009	March 2025	SOC
17	LandUseViolations_Statistics_2025	TANAP		October 2025	ENV
18	Row Patrolling Daily Report / Günlük Rapor x 10	Botas / PTT Anadolum		August – September 2025	ENV
19	River Crossing Survey Service Report (2024)	Fugro	FGR-REP-OPR-GEN-051_ for EBRD-P6-0	November 2024	ENV
20	Land and Slope Erosion Survey Service Report	Fugro	FGR-REP-OPR-GEN-052_for EBRD-P6-0	November 2024	ENV
21	Landslide Survey Service Report 2024	Fugro	FGR-REP-OPR-GEN-069_ for EBRD-P6-0	November 2024	ENV
22	Karst Survey Service Report (2024)	Fugro	FGR-REP-OPR-GEN-070_ for EBRD-P6-2	April 2025	ENV
23	Detailed ENV-focused-SOBs	TANAP		October 2025	ENV

Document Number	Document Name	Author	Code	Date	Environment/Social /OHS
24	Environmental And Social Third Party Monitoring And Consultancy Services Physical and Ecological Monitoring Report for Terrestrial Fauna Monitoring – Invertebrates, (June-2 2025)	Assystem	ASY-REP-ENV-GEN-039-P6-0	July 2025	ENV
25	Environmental And Social Third-Party Monitoring And Consultancy Services Physical and Ecological Monitoring Report for Terrestrial Fauna Monitoring – Invertebrates, (July-1 2025)	Assystem	ASY-REP-ENV-GEN-041-P6-0	July 2025	ENV
26	Environmental And Social Third Party Monitoring And Consultancy Services Physical and Ecological Monitoring Report for Terrestrial Fauna Monitoring – Reptiles, (June-2025	Assystem	ASY-REP-ENV-GEN-042-P6-0	July 2025	ENV
27	Environmental And Social Third Party Monitoring And Consultancy Services Physical and Ecological Monitoring Report for Terrestrial Fauna Monitoring – Invertebrates, (July-2 2025)	Assystem	ASY-REP-ENV-GEN-043-P6-0	August 2025	ENV
28	Environmental And Social Third Party Monitoring And Consultancy Services Physical and Ecological Monitoring Report for Terrestrial Fauna Monitoring – Reptiles, (July-2025	Assystem	ASY-REP-ENV-GEN-044-P6-0	August 2025	ENV
29	Environmental And Social Third Party Monitoring And Consultancy Services Physical and Ecological	Assystem	ASY-REP-ENV-GEN-045-P6-0	August 2025	ENV

Document Number	Document Name	Author	Code	Date	Environment/Social/OHS
	Monitoring Report for Terrestrial Fauna Monitoring – Invertebrates, (August-1 2025)				
30	Appendix C of Forest Monitoring Report 2024	WSP	GLR-REP-ENV-GEN-075-P6-0	January 2025	ENV
31	Appendix H of Forest Monitoring Report 2024	WSP	GLR-REP-ENV-GEN-075-P6-0	January 2025	ENV
32	Appendix B of Forest Monitoring Report 2024	WSP	GLR-REP-ENV-GEN-075-P6-0	January 2025	ENV
34	Appendix G of Forest Monitoring Report 2024	WSP	GLR-REP-ENV-GEN-075-P6-0	January 2025	ENV
35	Biodiversity Offset Projects Implementation and Monitoring Annual Report	WSP	GLR-REP-ENV-GEN-075-P6-0	January 2025	ENV
36	Greenhouse Gas Emissions Report 2024	TANAP	TNP-REP-ENV-GEN-035	February 2025	ENV
37	Assystem Annual Report	Assystem	ASY-PRM-ENV-GEN-022-P6-0	October 2025	ENV
38	Waste Management Procedure	TANAP	TNP-PCD-ENV-GEN-007	March 2025	ENV
39	Environmental Monitoring Plan for Operations	TANAP	TNP-PLN-ENV-GEN-008	September 2025	ENV
40	QHSSE Training Plan	TANAP	TNP-PLN-HSE-GEN-011	November 2024	ENV
41	Environmental Compliance Review Report – CS1 / MS1	TANAP	TNP-REP-ENV-CS1-010	September 2025	ENV

Document Number	Document Name	Author	Code	Date	Environment/Social /OHS
42	Environmental Compliance Review Report – CS3 AMC	TANAP	TNP-REP-ENV-CS3-004	April 2025	ENV
43	Environmental Compliance Review Report – CS5 / MS2	TANAP	TNP-REP-ENV-CS5-013	September 2025	ENV
44	Environmental Compliance Review Report – MCC	TANAP	TNP-REP-ENV-MCC-010	February 2025	ENV
45	Environmental Compliance Review Report – MS3 / MS4	TANAP	TNP-REP-ENV-MS4-004	March 2025	ENV
46	Enviroment KPIs Q2	TANAP		October 2025	ENV
47	Evidence of Chemical Compatibility at CS3	TANAP		October 2025	ENV
48	Organisational Chart	TANAP		October 2025	ENV
49	O&M Incident Initial Notification x 6	TANAP	TNP-HSM-FRM-042	February – October 2025	ENV
50	TANAP HS Inspection And Audit Checklist CS3&AMC	TANAP	TNP-HSM-CHK-008	July 2025	OHS
51	TANAP HS Inspection And Audit Checklist MS3&MS4	TANAP	TNP-HSM-CHK-008	July 2025	OHS
52	TANAP HS Inspection And Audit Checklist CS1&MS1	TANAP	TNP-HSM-CHK-008	August 2025	OHS
53	TANAP HS Inspection And Audit Checklist CS5&MS2	TANAP	TNP-HSM-CHK-008	July 2025	OHS

Document Number	Document Name	Author	Code	Date	Environment/Social /OHS
54	TANAP HS Inspection And Audit Checklist MCC	TANAP	TNP-HSM-CHK-008	July 2025	OHS
55	TANAP HS Inspection And Audit Checklist HQ	TANAP	TNP-HSM-CHK-008	July 2025	OHS
56	TANAP Hazardous Substances Register (All Sites)	TANAP		October 2025	OHS
57	Site Emergency Response Exercise Report x 21	TANAP	TNP-OPR-TMP-019	January – August 2025	OHS
58	Training Record for MSDS	TANAP	TNP-HMR-FRM-010 P3-1	March 2025	OHS
59	Safet Moment for MSDS	TANAP	TNP-HMR-FRM-010 P3-1	December 2024	OHS
60	TANAP Hs Inspection and Audit Checklist for each Facility x 10	TANAP	TNP-HSM-CHK-008	March – June 2025	OHS
61	TANAP HS and KPI Report 2025	TANAP		October 2025	OHS
62	HS Training Register and Matrix	TANAP		October 2025	OHS
63	O&M Incident Register	TANAP		January – October 2025	OHS
64	Pro&Mod Incident Register	TANAP		January – October 2025	OHS
65	O&M Incident Initial Notification x 77	TANAP	TNP-HSM-FRM-042	January – October 2025	OHS

Appendix B: 2024 Findings Summary Table

Ref	Description of Issue	Recommendation (action)	Compliance Category	Commitment	Status
Findings from the 2024 Monitoring Period					
1.1	The next review of the Operation Phase Land Access Management Procedure (Land Entry, Land Exit and Compensation) should consider and document how vulnerable households should be assessed and considered in implementation of the Procedure.	TANAP has an obligation to ensure disadvantaged or vulnerable groups or individuals are not disproportionately affected by the project; Any additional support provided to vulnerable households should be appropriate to the nature and the scale of the impact on their affected land.	PC	PR1 / PS1 PR10	**Open**
2.2 (2.5.3.8)	Hazardous chemicals at MS4 were stored together when they should have been segregated in 2024. This follows on from a similar finding at CS3 in 2023.	1. The IESC would recommend that all chemical storage matrix sheets across the project be updated to a more easily identifiable version.	FC	PR2 / PS2 OHS	**Closed**
6.2 (2.10.5.1)	Monitoring for vegetation and fauna during the operational phase is ongoing but data is not presented in a way that clearly shows trends and potential areas of concern	The IESC recommends that the annual report includes a section which pulls together previous results to look at trends. This can be used to amend survey effort and approach as needed	FC	PR6 / PS6 Monitoring	**Open**

Ref	Description of Issue	Recommendation (action)	Compliance Category	Commitment	Status
2.1 (2.5.3.4)	Hazardous waste containers at CS3 (AMC) were not all clearly labelled, in addition to the incompatible storage of flammable and poisonous materials.	All employees responsible for the storage of hazardous materials and hazardous waste at CS3 (AMC) should be given refresher training, and additional checks carried out over the next 6 months by the Environmental Department to ensure the correct hazardous materials/waste storage measures are being implemented.	FC	PR2 / PS2 OHS PR3 / PS3 Pollution Prevention and Control	**Closed** TANAP has shown exemplary commitment to improving the chemical storage process across all facilities.
Open findings from previous years					
3.3 (2.4.5)	Breaches in the Project wastewater quality standards at various TANAP Stations due to technical issues.	Review whether the remedial measures taken to address coliform exceedances at Stations have been effective, and conduct further investigation, and identify/implement additional mitigation measures if needed.	FC	PR3 / PS3 Resource Efficiency, Pollution Prevention and Control;	**Open** Remains open due to the issue being ongoing during 2025. Until evidence can be provided of a consistent improvement in wastewater discharge quality, and TANAP is better able to meet the relevant wastewater standards and KPI targets, the finding from 2023

Ref	Description of Issue	Recommendation (action)	Compliance Category	Commitment	Status
					(3.3) remains open
6.6	Both the forest and steppe offset plans have been written and are being implemented. The proposed monitoring methodology is quite complicated, and still requires a power analysis to determine sufficiency of plots to allow a statistically significant outcome. **The offset need will change as the ROW re vegetates. This data is currently not being captured in the BOS residual impacts table, but following the EUNIS surveys in 2024 this can be updated.**	For lender reporting, a simple set of metrics needs to be developed, so that for the steppe management, changes can be measured and reported on more easily. **To determine if the offset requirements are being met (for no net loss/net gain) a ROW EUNIS habitat survey should be undertaken (ear 5), so that the residual impacts table in the BOS can be updated.**	PC	PR6	**Open** This recommendation remains open as the EUNIS survey is due to be undertaken in 2027. It is also recommended that the results of the flora and fauna monitoring be integrated to provide an understanding of residual impacts across the project and whether NNL/NG has been achieved.