

2023



Responsible Lobbying

OUR RESPONSIBLE LOBBYING APPROACH

As Zorlu Enerji, we embrace the values of trust, integrity, transparency, accountability, open and equal communication, which are at the core of our corporate culture. We consider these values as guarantees for the preservation and strength of our reputation. By placing these values at the center of our business practices, we respect the existence, roles, and responsibilities of the institutions and organizations with whom we establish relationships.

As one of the leading companies in the energy sector, we are aware of the necessity of prioritizing renewable energy investments for the establishment of a sustainable future in our country and the world. Accordingly, we engage in advocacy and collaborations based on scientific principles in public, civil society, and private sector platforms to prioritize these investments.

PUBLIC POLICY

We believe that responding transparently to the needs and expectations of all our stakeholders is of utmost importance for our sustainable business performance. Public institutions and organizations, regulatory authorities, local governments, and civil society organizations are our primary stakeholders who directly impact our business. As part of our responsible lobbying approach, we conduct visits and meetings with policymakers, regulatory authorities, local governments operating in our investment areas, and civil society organizations, regardless of any political views, with a focus on serving the highest benefit to society. We also participate in various joint projects for the public good and voluntarily share our expertise in the energy field on a scientific basis.

We value the opinions of all our stakeholders and with an accessible understanding, we ensure the continuity of communication, both on physical and digital channels. We share our contact information, including address, phone number, and email addresses, on our corporate website for our stakeholders who would like to have direct contact with the Company and ensure timely responses to suggestions, comments, and complaints through a communication form. For our contact information, please visit <https://www.zorluenerji.com.tr/tr/iletisim/zorlu-enerji-iletisim-bilgileri>.

We declare that in case of any unavoidable disputes that may arise in joint collaborations with the public institutions, our cooperation protocols aim to find mutual solutions, and proceedings will be carried out through authorized courts in accordance with the laws of Türkiye.

TRANSPARENCY AND ETHICAL PRINCIPLES

In our activities conducted in the economic, social, and environmental fields, we adhere to the principle of maintaining an equal distance among public institutions, non-governmental organizations, and political parties. We maintain a non-partisan communication and avoid engaging in financial or non-financial relationships with public officials, political individuals, and representatives, in compliance with relevant laws and regulations. We do not provide financial support to any political party or organization. The decision of our employees and managers to participate in any political activity or social engagement, as well as contribute to them, is personal. We do not allow activities in the workplace that involve propagating their political beliefs or engaging in activities aimed at spreading political thoughts on political issues. We do not allocate company resources (such as vehicles, computers, email, etc.) for political purposes.

As Zorlu Enerji, we adhere to Zorlu Holding Code of Ethics. In this regard, we never offer cash, gift vouchers, or any equivalent value as gifts to our public stakeholders, and we do not accept such offers from them. We do not encourage public officials to violate their code of professional conducts. In accordance with the principles outlined under the title of "Conflict of Interest - Corporate and Personal" in Zorlu Holding's Ethical Principles, while giving or receiving gifts, or engaging in representation and hospitality, we prioritize the criteria of "being moderate" and "avoiding any negative impact on the company's reputation in the level of our stakeholders or third parties. This applies not only to all our stakeholders but also to public officials. When faced with an inappropriate offer or when any observation or doubt arises, we report it to the Ethics Principles Reporting Line at the email address etik@zorlu.com. For detailed information on the Code of Ethics, please refer to the link <chrome-extension://efaidnbmnnnibpcajpcgklcfindmkaj/https://www.zorlu.com.tr/assets/files/pdf/zorlu-holding-etik-ilkeler.pdf>

In our relationships with legal regulatory institutions and organizations, we prioritize open, complete, accurate, and timely communication. We approach all domestic and foreign institutions and organizations without discrimination when conducting our activities and fulfilling our legal obligations. We obtain information from reliable sources and do not spread false information.

If we receive a notification regarding the misrepresentation of our officials to deceive third parties and/or public personnel, we handle such claims with an investigation and audit within the scope of our company regulations and Code of Ethics. We respect the confidentiality of our former public personnel employees and ensure the protection of personal data of all our employees in accordance with the rules of the Personal Data Protection Law (KVKK).

As a publicly traded company, we announce our company's commercial activities, shares, and government incentives through the Public Disclosure Platform (KAP). Since there is no specific legal regulation governing lobbying activities in Türkiye, we regulate our activities through our company regulations and align our practices with international agreements. In this regard, we establish internal and external audit mechanisms to ensure transparency and openness. Under the umbrella of Zorlu Holding Audit Group Presidency, audit teams operate based on the International Internal Audit Standards to audit financial and operational processes, within the scope of the annual plan approved by the Board of Directors. Additionally, in case of a notification concerning a violation of business ethics in stakeholder relations, including lobbying activities, the Internal Audit and Ethics Directorate conducts a separate investigation and audit, and the results are reported to the Ethics Committee for further action. In 2022, no notifications about concerning violations of business ethics, including those related to the deals with the public institutions, were received for Zorlu Enerji Group Companies' employees.

We transparently disclose our collaborative efforts and financial support in sectoral topics until today. At Zorlu Group, we aim to direct our corporate donations and social support in a way that best contributes to our society. To this end, we focus our donations and social support on projects, institutions and organizations that will strengthen Zorlu Group's reputation, socially beneficial activities and the people and organizations associated with these activities, public benefit accounts and non-profit organizations.

To ensure diversity, capacity, and resource balance between institutions, we engage in lobbying activities in various areas, such as top tier universities, local governments, and institutions operating in the energy sector. We commit to providing up-to-date, honest, and comprehensive information to the public, and since 2021, we continue to publish information regarding our financial support on our corporate website. We will continue to announce the developed cooperations and supported projects at the end of each year.

1	SPONSORSHIPS
1.1	Sabancı University (IICEC) Support
1.2	Turkish Heritage Organisation Collaboration
1.3	13th Turkey Energy Summit
1.4	Istanbul Carbon Summit Sponsorship
1.5	ISTRATE Sponsorship
1.6	Women Empowering Turkey in Energy Awards Ceremony Sponsorship
1.7	TOSFED
1.8	ICCI Sponsorship
1.9	University Sponsorships
1.10	Atlantic Council
1.11	UK Embassy
1.12	Aydın University I. International Scientific Congress
2	NON GOVERNMENTAL ORGANIZATION SUPPORTS – CHARITABLE CONTRIBUTIONS
2.1	Tohum Türkiye Autism Early Diagnosis and Education Foundation Support
2.2	Turkish Education Foundation Support
2.3	Animal Rights Federation Support
2.4	Clean Harvest Cooperative Collaboration
3	“ENERJİMİZ BÖLGEMİZ İÇİN” EVENTS – CHARITABLE CONTRIBUTIONS
3.1	Enerjimiz Bölgemiz İçin Project - Alaşehir
3.2	Enerjimiz Bölgemiz İçin Project - İkizdere
3.4	Enerjimiz Bölgemiz İçin Project - Sarayköy
3.5	Enerjimiz Bölgemiz İçin Project - Gökçedağ
3.6	Enerjimiz Bölgemiz İçin Project - Kars
3.7	Enerjimiz Bölgemiz İçin Project - Kırklareli
3.8	Enerjimiz Bölgemiz İçin Project – Earthquake Zone
4	STUDENT SCHOLARSHIPS - CHARITABLE CONTRIBUTIONS
4.1	Mehmet Zorlu Foundation Scholarships

4 STUDENT SCHOLARSHIPS - CHARITABLE CONTRIBUTIONS**4.1 Mehmet Zorlu Foundation Scholarships**

We shared our collaborations that were carried out between January 1, 2023, and December 31, 2023, to the public on our website, as listed above. The total budget for donations, sponsorships, and contributions realized on an annual basis is as follows. These amounts include sponsorships, earthquake zone donations, scholarships, and similar activities.

	2021	2022	2023
Contributions political parties and candidates	0	0	0
Lobbying activities, sponsorships and social contributions	4,702,047 TL	14,591,546 TL	33,359,195 TL *

* Amount announced at the Ordinary General Meeting dated May 27, 2024.

Largest Contributions	Details	2023
Ministry of Interior Disaster and Emergency Management Presidency (AFAD) / Charitable Contributions	It covers institutional aid to the earthquake zone, not political contributions.	15,000,000 TL
Mehmet Zorlu Foundation / Charitable Contributions	It includes annual scholarship amount, earthquake zone assistance, and donations.	5,580,596 TL
Turkish Education Foundation	It covers donations on special occasions.	106,600 TL

ADVOCACY ACTIVITIES

To reflect the unique problems of regions and provide solutions, we conduct advocacy activities. These activities are implemented through our membership in various non-profit organizations, sponsorship campaigns, and awareness-raising initiatives conducted in our operational areas. Through the national and international non-profit organizations memberships, we enhance social development activities in the sector. In line with the Paris Agreement, we support the work of institutions and organizations that carry out advocacy and lobbying activities on climate change and follow developments in the sector. We share our sectoral know-how with other members in associations in the fields of renewable energy and mobility, and conduct awareness-raising activities on the effective and efficient use of energy. We continue our activities by coming together with business people in the energy sector to explain the role of clean energy in economic growth.

We are a member of the Climate Platform, jointly established by the Resource, Environment and Climate Association (REC Türkiye) and Turkish Industry and Business Association (TÜSİAD) to support the efforts of the Turkish business community in the efforts against climate change and to help transition to a low-carbon economy. The Climate Platform brings together the business community to discuss key issues of transition to a low-carbon economy, such as technology transfer, financing and carbon management in the supply chain. The Platform's main areas of focus are to support the private sector in strengthening corporate governance and risk management on climate change and to provide insights, analysis and information to the private sector. Platform members support the development of national climate change policies, the establishment of public-private sector cooperation in counteracting climate change and the active participation of the business world in international negotiations.

As Zorlu Enerji, we are also a member of the Energy Workshop and the Environment Working Group. In this regard, we are in favor of the implementation of the legal framework to include MRV (Measurement, Reporting and Verification) processes for other sectors, including SMEs, and we expect a satisfactory and inclusive transition to a low carbon economy at the national level. We aim to contribute to bridging knowledge gaps between actors from different sectors, consultants, verifiers and relevant government departments.

As a company with 100% of its production from renewable energy, we carry out our lobbying activities for geothermal energy, which constitutes a large part of our investments, through the Geothermal Energy Association, of which we are one of the founders. Through TV programs, university panels, press releases and media communication, we explain to the public that geothermal energy is a clean and renewable energy source. We emphasize the importance of transparency and ethical values of public policies and advocacy activities, and we carry out our activities in this context under the coordination of the Marketing and Corporate Communications Directorate and the Public Relations Directorate.

Below, we submit our corporate memberships, the level of representation within our company and the responsibilities of our representatives.

Organizations and Institutions	Representatives	Position in the Company	Role in the Organization and Institution	Representative Responsibilities
DEİK (Foreign Economic Relations Board of Türkiye)	Sinan Ak	CEO	Representative Member	Carries out activities to support business development efforts such as conducting foreign economic relations of the Turkish private sector and increasing Turkey's exports. Participates in the general assemblies of the business councils of which he is a member and has the right to elect and be elected in the executive boards.
DEİK Energy Business Council	Sinan Ak	CEO	Representative Member	
DEİK Türkiye - U.S. Business Council	Sinan Ak	CEO	Representative Member	
DEİK Outbound Investments Business Council	Sinan Ak	CEO	Representative Member	
TESAB (Association of Turkish Electricity Industry)	Sinan Ak	CEO	Representative Member	Works on social, political, technical, legal and institutional issues directly or indirectly related to the generation, transmission, distribution, sale and consumption of electricity and assists in solving problems raised by the members of the association.
CIGRE Türkiye National Committee (International Council on Large Electrical Systems)	Sinan Ak	CEO	Representative Member	Participates in CIGRE working groups and exchanges technical ideas. Ensures that the company and employees are aware of CIGRE's activities. Participates in CIGRE Turkey National Committee meetings, contributes to TESAB reports and newsletters, promotes and participates in events such as national and international conferences and panels.
ENVER (Energy Efficiency Association)	Sinan Ak	CEO	Representative Member	Takes part in awareness-raising activities on the effective and efficient use of energy, participates in general assembly votes.
ETD (Energy Traders Association)	Sinan Ak	CEO	Representative Member	Supports efforts to prepare infrastructures for independent energy trade and to establish ethical rules in trade, and participates in general assembly votes.
EÜD (Electricity Producers Association)	Sinan Ak	CEO	Representative Member	Comes together with other electricity producers and participates in general assembly votes on the quality, environmental compatibility and low cost of electricity.
GÜYAD (Energy Investors Association)	Sinan Ak	CEO	Representative Member	Participates in training activities such as seminars, congresses, conferences, workshops, etc. for the development and dissemination of renewable energy power plants. Participates in efforts to take the necessary steps at the public level to create a favorable investment climate.
INTES (Turkish Employers' Association of Construction Industries)	Sinan Ak	CEO	Representative Member	Shares views on the activities of the Association and participates in sectoral meetings.
DEK (World Energy Council Turkish National Committee)	Sinan Ak	CEO	Representative Member	Participates in symposiums, congresses and conferences organized by the Association and comes together with sector leaders. Contributes to the preparation of reports that bring together public, private sector and university representatives through working groups.
United Nations Global Compact Türkiye	Sinan Ak	CEO	Representative Member	Participates in the meetings and activities of the working groups to which he is assigned and informs the members of the association about the working groups he participates in.
SMİ (Sustainable Mobility Initiative)	Sinan Ak	CEO	Representative Member	Authorized to participate in events and vote in the general assembly with the aim of expanding mobility for a sustainable future by considering climate change.

Organizations and Institutions	Representatives	Position in the Company	Role in the Organization and Institution	Representative Responsibilities
IICEC (Sabancı University Istanbul International Center for Energy and Climate)	Sinan Ak	CEO	Representative Member	Represented in the IICEC Board of Directors, can participate in IICEC events (conferences, workshops, seminars, etc.).
Union of Chambers and Commodity Exchanges of Türkiye Energy Council	Sinan Ak	CEO	Representative Member	Participates in sectoral meetings and events. Has the authority to vote in the general assembly.
E-MOD (E-Mobility Operators Association)	Sinan Ak	CEO	Vice Chairperson of the Board	Represents the Association, manages income and expenditure accounts and prepares a budget. Organizes the aims and activities of the Association, implements the decisions of the General Assembly, and takes decisions for the purpose of the Association.
H2DER (Green Hydrogen Producers Association)	Sinan Ak	CEO	Representative Member	Shares sectoral experiences through events such as seminars/conferences/summits and publications to utilize the country's green hydrogen potential.
ELDER (Association of Electricity Distribution System Operators)	Sinan Ak	CEO	Board Member	Represents the Association and employs the necessary personnel to carry out its activities efficiently. Makes all kinds of purchases and sales transactions, submits the budget, work programs and necessary proposals to the General Assembly. Decides on the establishment of the boards and commissions deemed necessary to organize the activities of the Association, determines the duties and powers of the Secretary General and the working conditions.
TÜSİAD (Turkish Industry and Business Association)	Sinan Ak	CEO	Representative Member	Representatives attend and contribute to the meetings and activities of the working groups to which they are assigned, and inform the members of the association about the working groups they participate in.
German-Turkish Chamber of Industry and Commerce	Sinan Ak	CEO	Representative Member	Participates in workshops, events and meetings. Actively exchanges ideas in various working groups formed by representatives.
ÇATIDER (Association of Roofing Industrialists and Businesspeople)	Sinan Ak	CEO	Representative Member	Entitled to participate in events and vote.
SKD Türkiye (Business Council for Sustainable Development Türkiye)	Sinan Ak	CEO	Representative Member	Has voting and signing authority. In order for the company to improve itself in sustainability reporting, follows the activities of the association and participates in related projects.
TÜREB (Turkish Wind Energy Association)	Ali Kindap	General Manager, Investments, O&M	Representative Member	Follows scientific, technical and applied research on wind energy, participates in the activities prepared to popularize the use of wind energy resources and votes in the general assembly.
JED (Geothermal Energy Association)	Ali Kindap	General Manager, Investments, O&M	Chairperson of the Association	Carries out activities on behalf of the Association, determines the duties and responsibilities of the Secretary General, calls the Board of Directors of the Association to a meeting, determines the agenda of the meeting and manages the meetings. Represents the Board of Directors and acts as the spokesperson of the Association in various media.
National Hydrogen Association	Ali Kindap	General Manager, Investments, O&M	Representative Member	Attends the general assembly every two years. Attends congresses and can convene the Board Members if there is a request for reports and work.
ENSİA (Energy Industrialists and Businessmen's Association)	Ali Kindap	General Manager, Investments, O&M	Representative Member	Can take part in all kinds of organs of the association, can benefit from the services of the association within the scope of technological and funding support.

Organizations and Institutions	Representatives	Position in the Company	Role in the Organization and Institution	Representative Responsibilities
TÜRKOTED (Turkish Cogeneration Association)	Ali Kindap	General Manager, Investments, O&M	Representative Member	Participates in meetings, seminars, conferences, etc. organized by the Association.
ERTA (Integrated Reporting Türkiye Network)	Elif Yener	General Manager, Financial Affairs	Representative Member	Participates in sectoral exchanges in the field of reporting by participating in working groups. Has the authority to vote in the general assembly.
TÜMAKÜDER (Accumulator Importers and Producers Association)	Evren Evcit	Director, Solar and Foreign Investments	Representative Member	Responsible for being aware of the operations and information required to be carried out on behalf of the company in relation to the existing legislation. Follows the processes in favor of Zorlu Enerji.
DEİK Türkiye - Pakistan Business Council	Evren Evcit	Director, Solar and Foreign Investments	Representative Member	Participates in general assemblies and has the right to elect and be elected to executive committees.
GÜNDER (International Solar Energy Society Türkiye Section)	Evren Evcit	Director, Solar and Foreign Investments	Representative Member	Has the right to attend the monthly board meeting, to sign the decisions of the Board of Directors, and to elect and be elected in the general assembly.
GENSED (Solar Energy Industrialists and Industry Association)	Evren Evcit	Director, Solar and Foreign Investments	Representative Member	Entitled to participate in events and vote.
Energy Storage Industries Association	Evren Evcit	Director, Solar and Foreign Investments	Representative Member	Entitled to participate in events and vote.
DEİK Türkiye - Greece Business Council	Elçin Trakadas	Country Manager, Greece	Representative Member	Participates in general assemblies, can vote and be elected in executive boards
KİD (Corporate Communication Association)	Funda Küçükosmanoğlu	Director, Marketing and Corporate Communication	Representative Member	Entitled to participate in events and vote.
ÖSGD (Corporate Volunteers Association)	Funda Küçükosmanoğlu	Director, Marketing and Corporate Communication	Representative Member	Ensures communication between the association and the company. Ensures that the projects, volunteering activities and training announcements carried out by the association are disseminated within the company.
TÜHİD (Public Relations Association of Türkiye)	Funda Küçükosmanoğlu	Director, Marketing and Corporate Communication	Representative Member	Has the authority to vote. Participates in various invitations and events to improve the company's communication channels.
TKSD (Corporate Social Responsibility Association of Türkiye)	Funda Küçükosmanoğlu	Director, Marketing and Corporate Communication	Representative Member	Participates in the regular Green Talks event and follows sustainability-oriented studies with people from different sectors. Supports CSR and sustainability activities carried out by the association.
TRAI (Turkish AI Initiative)	Adnan Çomakoğlu	Manager, New Generation Technologies	Representative Member	Entitled to participate in events and vote.
KalDer (Turkish Quality Association)	Tamer Soylu	Manager, Sustainability	Representative Member	Accesses KalDer Academy platform trainings (online training), webinar series and Harvard Business Review articles. Has a say in the management of the association by voting in the general assembly.
Environment and Climate Change Working Group of Turkish Industry and Business Association	Tamer Soylu	Manager, Sustainability	Representative Member	Contributes to the meetings and activities of the working groups to which he is assigned, and informs the members of the association about the working groups he participates in.
YEYKAD (Green Collar Women Association)	Funda Küçükosmanoğlu, Ulaş Karaağaç	Director, Marketing and Corporate Communication; Group Manager, Business Development	Representative Member	Participates in activities for the transition to clean energy and the recognition of green technology, and is authorized to vote.