

2024



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/en/contact>

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 <https://www.zorluenerji.com.tr/en/impact-oriented-growth/ethics-compliance>

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	Wind Energy Hamburg Fair
1.3	14th Turkey Energy Summit
1.4	Istanbul Carbon Summit
1.5	ISTRATE Sponsorship
1.6	6th Energy and Climate Forum
1.7	The Future of Mobility Summit
1.8	Turkish Wind Energy Congress
1.9	ICCI Sponsorship
1.10	University Sponsorships
1.11	Atlantic Council
1.12	International Geothermal Energy Congress & Exhibition
1.13	IRENEC
1.14	ITU PDG Summit
1.15	TWRE-YEYKAD International Women's Day Event
1.16	TÜSİAD Climate Summit
1.17	Turkey Natural Resources Summit
1.18	Ayvalık Business Forum
2	NON GOVERNMENTAL ORGANIZATION SUPPORTS – CHARITABLE CONTRIBUTIONS
2.1	Tohum Türkiye Autism Early Diagnosis and Education Foundation Support
2.2	Darüşşafaka Society Support
2.3	Animal Rights Federation Support
3	“ENERJİMİZ BÖLGEMİZ İÇİN” EVENTS – CHARITABLE CONTRIBUTIONS
3.1	Enerjimiz Bölgemiz İçin Project - Alaşehir
3.2	Enerjimiz Bölgemiz İçin Project - İkizdere
3.3	Enerjimiz Bölgemiz İçin Project - Ovacık
4	STUDENT SCHOLARSHIPS - CHARITABLE CONTRIBUTIONS
4.1	Mehmet Zorlu Foundation Scholarships

We shared our collaborations that were carried out between January 1, 2024, and December 31, 2024, 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	2024
Contributions political parties and candidates	0	0	0	0
Lobbying activities, sponsorships and social contributions	4,702,047 TL	14,591,546 TL	33,359,195 TL	62,570,481 TL *

* Amount announced at the Ordinary General Meeting dated May 26, 2025.

Largest Contributions	Details	2024
Mehmet Zorlu Foundation / Charitable Contributions	It includes annual scholarship amount and donations.	60,919,800 TL
Ders Destek Project (with the Contribution of the School Support Association)	It refers to the project carried out to provide online Mathematics and Science courses for secondary school students.	900,000 TL
Overseas Education Support	It includes furnishing and educational support for primary schools and their students.	265,641 TL

ADVOCACY ACTIVITIES

Zorlu Enerji conducts advocacy and lobbying activities through membership in various trade associations and non-governmental organizations, aiming to contribute to sectoral development and promote sustainability goals.

1. Lobbying and Trade Association Membership Management System

Our company manages lobbying activities and trade association memberships through a transparent and ethical management system. This system ensures that our activities are aligned with our sustainability goals and corporate values.

Policy and Governance Mechanism

All lobbying and membership activities are conducted in accordance with the highest ethical standards, adhering to principles of anti-bribery and conflict of interest management. These activities are regularly reviewed and approved by senior management and the Board of Directors.

Transparency and Accountability

Details of lobbying activities and membership fees are disclosed in our internal and external reports. When discrepancies arise between associations' positions and company policies, we pursue constructive dialogue.

Alignment with Sustainability

All our activities are carried out in line with Zorlu Enerji's sustainability objectives, climate action strategies, and the United Nations Sustainable Development Goals. Our contributions to public policy aim to create a sustainable business environment that considers the interests of all stakeholders.

Collaboration with Trade Associations and NGOs

Zorlu Enerji actively participates in various platforms, including TÜSİAD, the Turkish Business Council for Sustainable Development (SKD Turkey), the Technology Development Foundation of Turkey (TTGV), the UN Global Compact, and the Geothermal Energy Association. Through these platforms, the company contributes to sectoral policy and regulatory processes and conducts awareness-raising initiatives in collaboration with various stakeholders.

- **TÜSİAD:** Participates in the Energy Working Group and the Environment and Net Zero Policies Working Group, supporting the inclusive implementation of MRV (Measurement, Reporting, and Verification) processes for greenhouse gas emissions and contributing to cross-sector knowledge sharing.
- **SKD Turkey:** Contributes to the Renewhub project under the Renewable Energy Project Group, ensuring high participation in events and webinars. Supports young leaders in developing sustainability-focused innovative proposals through the Young Impact Program.

- **TTGV:** Shares knowledge in the Hydrogen Working Group and Carbon Capture, Utilization, and Storage Working Group under the Climate Lab Community, promoting the dissemination of best practices.

UN Global Compact Turkey Membership

As a member of UN Global Compact Turkey, Zorlu Enerji complies with global principles on human rights, labor standards, environment, and anti-corruption.

- **Utilized Services:** Participation in the association's training and capacity-building programs and access to information and resource-sharing platforms.
- **Transparency and Reporting:** Sustainability performance is tracked and publicly shared in accordance with international standards through the annual Communication on Progress (CoP) report.

Geothermal Energy Lobbying

As a company generating 100% of its production from renewable energy, Zorlu Enerji conducts lobbying activities for geothermal energy, a significant portion of its investments, through the Geothermal Energy Association, of which it is a founding member.

- **Awareness Activities:** Various channels, including TV programs, university panels, press releases, and media communications, are used to raise public awareness of geothermal energy as a clean and renewable resource.

2. Lobbying Responsibilities up to C-Level Executives

Responsibilities for public policy interactions are assigned to senior leadership.

- **Senior Management:** At the CEO and General Manager level, public policy strategies are defined and submitted for Board approval. The Board monitors the ethical compliance and alignment of lobbying activities through the Audit Committee. Critical communications with stakeholders, including investors, local authorities, and employees, are managed by top management. Feedback on societal needs is collected semi-annually through the Corporate Communications and Marketing Directorate.
- **Relevant Departments:** Corporate Communications, Sustainability, and Legal departments manage daily interactions and operational processes, planning and executing activities collaboratively.
- **Accountability:** Records of all activities, objectives, and expenditures are meticulously kept, regularly reviewed by internal audit mechanisms, and transparently shared in sustainability reports.

This structure ensures that our contributions to public policy are transparent, ethical, and aligned with the company's long-term goals.

3. Climate Change Policy Statement (Aligned with the Paris Agreement)

Zorlu Enerji has adopted a climate policy aligned with the Paris Agreement. We share knowledge within renewable energy and mobility associations, raise awareness of efficient energy use, and engage with business leaders to highlight the role of clean energy in economic growth. We also closely monitor sector developments.

As a member of the Climate Platform, jointly established by the Regional Environmental Center Turkey (REC Turkey) and TÜSİAD, Zorlu Enerji supports joint business action on low-carbon transition, technology transfer, financing, and carbon management.

4. Reviewing and Monitoring Lobbying Activities for Paris Agreement Alignment

The company continuously reviews and monitors its advocacy and lobbying activities on climate change to ensure alignment with the Paris Agreement. We advocate for the implementation of the Climate Law, related regulations, and MRV processes, supporting an inclusive national transition to a low-carbon economy. Additionally, we aim to bridge knowledge gaps among actors, consultants, verifiers, and government units across sectors.

5. Framework for Addressing Misalignments between Trade Association and Company Climate Positions

Zorlu Enerji plans all activities in alignment with corporate strategy, balancing public interest and supporting net-zero and low-carbon economy goals. While pursuing renewable energy-focused growth, we monitor the climate policies of trade associations we are members of or collaborate with. In case of misalignment with Zorlu Enerji's climate goals, the issue is evaluated with relevant units, corporate membership is reviewed, and if necessary, membership is terminated with senior management approval, ensuring ethical, transparent, and consistent action in climate change matters.

In line with our commitments, we continue to work toward achieving net-zero carbon emissions across our value chain, aligning our 2030 and 2040 targets with the Science Based Targets initiative (SBTi) and the Paris Agreement. SBTi's approval validates our actions in addressing the climate crisis as consistent, transparent, and effective. Our 2030 and 2040 targets are presented in the table below

Targets	Base Year	Target Year	Target Type
Reduce Scope 1 emissions from electricity and heat production by 74% per MWh	2021	2023	Intensity
Reduce Scope 2 emissions by 42%	2021	2023	Absolute
Reduce Scope 1 and Scope 3 emissions from fuel and energy-related activities by 74% per MWh	2021	2023	Intensity
Reduce all other Scope 3 emissions by 25%	2021	2023	Absolute
Reduce Scope 1 emissions from electricity and heat production by 98%	2021	2040	Intensity
Reduce Scope 2 emissions by 90%	2021	2040	Absolute
Reduce Scope 1 and Scope 3 emissions from fuel and energy-related activities by 98%	2021	2040	Intensity
Reduce all other Scope 3 emissions by 90%	2021	2040	Absolute

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) DEİK Energy Business Council DEİK Türkiye - U.S. Business Council DEİK Outbound Investments Business Council DEİK Türkiye - Pakistan Business Council	Elif Yener	CEO	Representative Member	It carries out activities to support business development efforts such as conducting the foreign economic relations of the Turkish private sector and increasing Turkey's exports. It participates in the general assemblies of the business councils to which it is a member and has the right to elect and be elected to the executive boards.
ETD (Energy Traders Association)	Elif Yener	CEO	Representative Member	It supports efforts to establish the necessary infrastructure for the free conduct of energy trade and to set ethical standards in trading, and participates in general assembly voting.
INTES (Turkish Employers' Association of Construction Industries)	Elif Yener	CEO	Representative Member	It shares its views on the association's activities and participates in sectoral meetings.
DEK (World Energy Council Turkish National Committee)	Elif Yener	CEO	Representative Member	It attends symposiums, congresses, and conferences organized by the association to engage with industry leaders. Through working groups, it contributes to the preparation of reports that bring together representatives from the public sector, private sector, and academia.
United Nations Global Compact Türkiye	Elif Yener	CEO	Representative Member	The representative attends the meetings and activities of the working groups to which they are assigned and informs association members about the working groups they participate in.
IICEC (Sabancı University Istanbul International Center for Energy and Climate)	Elif Yener	CEO	Representative Member	It is represented on the IICEC Board of Directors and may participate in IICEC events such as conferences, workshops, and seminars.
Union of Chambers and Commodity Exchanges of Türkiye Energy Council	Elif Yener	CEO	Representative Member	Participates in sectoral meetings and events. Has the authority to vote in the general assembly.
H2DER (Green Hydrogen Producers Association)	Elif Yener	CEO	Representative Member	It shares its sectoral experiences through events and publications such as seminars/conferences/summits in order to realize the country's green hydrogen potential.
TÜSIAD (Turkish Industry and Business Association)	Elif Yener	CEO	Representative Member	They contribute by participating in the meetings and activities of the working groups to which they are appointed, and provide information to association members about the working groups they are involved in.
German-Turkish Chamber of Industry and Commerce	Elif Yener	CEO	Representative Member	Participates in workshops, events and meetings. Actively exchanges ideas in various working groups formed by representatives.
ERTA (Integrated Reporting Türkiye Network)	Elif Yener	General Manager, Financial Affairs	Representative Member	Participates in sectoral exchanges of ideas in the field of reporting by participating in working groups. Has the authority to vote in the general assembly.
SKD Türkiye (Business Council for Sustainable Development Türkiye)	Elif Yener	CEO	Representative Member	Has voting and signature authority. Follows up on association activities and participates in relevant projects so that the company can improve itself in sustainability reporting.
YEYKAD (Green Collar Women Association)	Elif Yener	CEO	Representative Member	Participates in activities for the transition to clean energy and the recognition of green technology and has the right to vote.
TESAB (Association of Turkish Electricity Industry)	Nihat Türksever	Deputy General Manager, Business Development	Representative Member	It works on social, political, technical, legal, and institutional issues directly or indirectly related to electricity generation, transmission, distribution, sales, and consumption, and supports the resolution of problems raised by union members.
CIGRE Türkiye National Committee (International Council on Large Electrical Systems)	Nihat Türksever	Deputy General Manager, Business Development	Representative Member	It takes part in CIGRE working groups to exchange technical ideas and ensures that the company and its employees stay informed about CIGRE's activities. It participates in CIGRE Turkey National Committee meetings, contributes to TESAB reports and bulletins, and promotes as well as attends national and international events such as conferences and panels.
EÜD (Electricity Generators Association)	Nihat Türksever	Deputy General Manager, Business Development	Representative Member	"They come together with other electricity generators to ensure electricity is of high quality, environmentally friendly, and low-cost, and participate in general assembly votes.

Organizations and Institutions	Representatives	Position in the Company	Role in the Organization and Institution	Representative Responsibilities
JED (Geothermal Energy Association)	Nihat Türksever	Deputy General Manager, Business Development	Representative Member	Conducts work on behalf of the Association, determines the duties and responsibilities of the Secretary General, calls the Association's Board of Directors to meetings, determines the meeting agenda and manages the meetings. Represents the Board of Directors and acts as the association's spokesperson in various media.
TÜREB (Turkish Wind Energy Association)	Ahmet Yılmaz	Group Manager, Wind Turbine Equipment Repair & Refurbishment	Representative Member	They follow scientific, technical, and practical research related to wind energy, participate in activities aimed at promoting the use of wind energy resources, and vote in the general assembly.
ENVER (Energy Efficiency Association)	Halil Öz	Group Manager, Planning, Trading and Field Operations	Representative Member	"It takes part in awareness-raising activities on the efficient and effective use of energy and participates in general assembly voting.
KalDer (Turkish Quality Association)	Tamer Soyulu	Group Manager, Sustainability, Quality and Occupational Health and Safety & Environment"	Representative Member	Access to KalDer Academy platform (online education) trainings, webinar series and HBR articles. Can have a say in the association management by voting in the general assembly.
Corporate Governance Association of Türkiye	Burcu Kulaklı	Group Manager, Consolidation and Reporting (Acting Head of Investor Relations Department)	Representative Member	Participates in association activities by following developments in the field of corporate governance. Benefits from training, publication and networking opportunities.
TRAI (Turkish AI Initiative)	Adnan Çomakoğlu	Manager, New Generation Technologies	Representative Member	It has the authority to attend events and exercise voting rights.
KİD (Corporate Communication Association)	Neslihan Seçen	Manager, Marketing and Corporate Communication	Representative Member	It has the authority to attend events and exercise voting rights.
ÖSGD (Corporate Volunteers Association)	Neslihan Seçen	Manager, Marketing and Corporate Communication	Representative Member	It ensures communication between the association and the company. It ensures that the projects, volunteer activities and training announcements carried out by the association are disseminated within the company.
TÜHİD (Public Relations Association of Türkiye)	Neslihan Seçen	Manager, Marketing and Corporate Communication	Representative Member	Has the authority to vote. Participates in various invitations and events to develop the company's communication channels.
TKSD (Corporate Social Responsibility Association of Türkiye)	Neslihan Seçen	Manager, Marketing and Corporate Communication	Representative Member	Participates in regular Green Talks events and follows sustainability-focused activities with people from different sectors. Supports CSR and sustainability activities carried out by the association.