ZORLU ENERJİ ELEKTRİK ÜRETİM A.Ş.

CDP Corporate Questionnaire 2026

Word version

Important: this export excludes unanswered questions
This document is an export of your organization's CDP questionnaire response. It contains all data points for questions that are answered or in progress. There may be questions or data points that you have been requested to provide, which are missing from this document because they are currently unanswered. Please note that it is your responsibility to verify that your questionnaire response is complete prior to submission. CDP will not be liable for any failure to do so.
Read full terms of disclosure

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09/16/2026, 06:15 am

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C1. Introduction

(1.1) In which language are you submitting your response?

Select from:

☑ English

(1.2) Select the currency used for all financial information disclosed throughout your response.

Select from:

☑ TRY

(1.3) Provide an overview and introduction to your organization.

(1.3.2) Organization type

Select from:

☑ Publicly traded organization

(1.3.3) Description of organization

Founded in 1993, Zorlu Enerji is a leading Turkish energy company committed to shaping the future of the energy sector through innovative, sustainable solutions. With a total installed capacity of approximately 673 MW—around 92% of which is sourced from renewable energy—Zorlu Enerji operates across the entire energy value chain, including electricity generation, distribution, trade, smart energy systems, electric vehicle (EV) charging infrastructure, solar panel installation and sales, and EV leasing. As part of our vision to become Turkey's leading energy company, we have strategically expanded our presence in both domestic and international markets. Our diversified generation portfolio includes geothermal, wind, solar, hydroelectric assets, with approximately 92% of our installed capacity in Turkey derived from renewable sources. We are also the market leader in geothermal energy, operating Turkey's largest geothermal complex and contributing approximately 17% to Turkey's total installed geothermal capacity. Zorlu Enerji integrates sustainability into its core business strategy. Our "Smart Life 2030" vision offers a holistic roadmap that emphasizes environmental responsibility, gender equality, community engagement, and innovation. Through strategic investments in clean energy and innovative technologies such as smart grids, energy storage systems, and high-efficiency geothermal solutions, we continue to support the global low-carbon transition. We take pride in being the first energy company in Turkey to report greenhouse gas emissions in line with ISO 14064-1 standards and consistently disclose climate-related data via the Carbon Disclosure Project (CDP). Our emission reduction targets, approved by the Science Based Targets initiative (SBTi), are aligned with the 1.5°C pathway, aiming for significant decarbonization by 2030 and achieving net-zero emissions by 2040. In addition to our environmental focus, we are deeply committed to social responsibility, employee wellbeing, and biodiversity preservation. We lead community development projects in education, health, and environmental

protection, while also advancing gender equality as a signatory of the UN Women's Empowerment Principles. With more than 5,300 EV charging sockets across nearly 2,000 locations under our ZES brand—commanding an approximately 20% market share—and strong growth in solar and wind energy investments, Zorlu Enerji continues to lead Turkey's energy transition and contribute to global climate goals through innovation, integrity, and impact.
[Fixed row]

(1.4) State the end date of the year for which you are reporting data. For emissions data, indicate whether you will be providing emissions data for past reporting years.

(1.4.1) End date of reporting year

12/31/2025

(1.4.2) Alignment of this reporting period with your financial reporting period

Select from:
☑ Yes

(1.4.3) Indicate if you are providing emissions data for past reporting years

Select from:
☑ Yes

(1.4.4) Number of past reporting years you will be providing Scope 1 emissions data for

Select from:
☑ 1 year

(1.4.5) Number of past reporting years you will be providing Scope 2 emissions data for

Select from:
☑ 1 year

(1.4.6) Number of past reporting years you will be providing Scope 3 emissions data for

Select from:
☑ 1 year
[Fixed row]

(1.4.1) What is your organization's annual revenue for the reporting period?

36197416000

(1.5) Provide details on your reporting boundary.

	Is your reporting boundary for your CDP disclosure the same as that used in your financial statements?
	Select from: ☑ Yes

[Fixed row]

(1.6) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?

ISIN code - bond

(1.6.1) Does your organization use this unique identifier?

Select from:
☑ Yes

(1.6.2) Provide your unique identifier

TRSZORN52526

ISIN code - equity

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ Yes

(1.6.2) Provide your unique identifier

TRAZOREN91L8

CUSIP number

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

Ticker symbol

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ Yes

(1.6.2) Provide your unique identifier

ZOREN.IS

SEDOL code

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

LEI number

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

D-U-N-S number

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

Other unique identifier

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

[Add row]

(1.7) Select the countries/areas in which you operate.

Select all that apply

☑ Pakistan

☑ Palestine (State of)

☑ Türkiye

(1.16) In which part of the electric utilities value chain does your organization operate?

Electric utilities value chain

☑ Distribution

☑ Electricity generation

☑ Electricity purchasing

(1.16.1) For your electricity generation activities, provide details of your nameplate capacity and electricity generation specifics for each technology employed.

Coal - Hard

(1.16.1.1) Own or control operations which use this power generation source

Select from:
☑ No

Coal - Brown

(1.16.1.1) Own or control operations which use this power generation source

Select from:
☑ No

Oil

(1.16.1.1) Own or control operations which use this power generation source

Select from:
☑ No

Gas

(1.16.1.1) Own or control operations which use this power generation source

Select from:
☑ Yes

(1.16.1.2) Nameplate capacity (MW)

50.52

(1.16.1.3) Gross electricity generation (GWh)

0

(1.16.1.4) Net electricity generation (GWh)

0

Sustainable biomass

(1.16.1.1) Own or control operations which use this power generation source

Select from:
☑ No

Other biomass

(1.16.1.1) Own or control operations which use this power generation source

Select from:
☑ No

Waste (non-biomass)

(1.16.1.1) Own or control operations which use this power generation source

Select from:
☑ No

Nuclear

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Fossil-fuel plants fitted with carbon capture and storage

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Geothermal

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ Yes

(1.16.1.2) Nameplate capacity (MW)

305

(1.16.1.3) Gross electricity generation (GWh)

1881

(1.16.1.4) Net electricity generation (GWh)

1456

Ocean thermal

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Hydropower

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ Yes

(1.16.1.2) Nameplate capacity (MW)

118.92

(1.16.1.3) Gross electricity generation (GWh)

323

(1.16.1.4) Net electricity generation (GWh)

323

Onshore wind

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ Yes

(1.16.1.2) Nameplate capacity (MW)

191.4

(1.16.1.3) Gross electricity generation (GWh)

377

(1.16.1.4) Net electricity generation (GWh)

377

Offshore wind

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Solar

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ Yes

(1.16.1.2) Nameplate capacity (MW)

6.08

(1.16.1.3) Gross electricity generation (GWh)

3.7

(1.16.1.4) Net electricity generation (GWh)

3.7

Wave

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Tidal

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Other renewable

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Other non-renewable

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Total

(1.16.1.2) Nameplate capacity (MW)

671.92

(1.16.1.3) Gross electricity generation (GWh)

2584.7

(1.16.1.4) Net electricity generation (GWh)

2159.7
[Fixed row]

(1.22) Provide details on the commodities that you produce and/or source.

Timber products

(1.22.1) Produced and/or sourced

Select from:

☑ Sourced

(1.22.2) Commodity value chain stage

Select all that apply

☑ Processing

(1.22.4) Indicate if you are providing the total commodity volume that is produced and/or sourced

Select from:

☑ Yes, we are providing the total volume

(1.22.5) Total commodity volume (metric tons)

61.81

(1.22.8) Of the total commodity volume, state how much is post-consumer recycled content (metric tons)

0

(1.22.9) Did you convert the total commodity volume from another unit to metric tons?

Select from:

☑ Yes

(1.22.10) Original unit

Select all that apply

☑ Kilogram

(1.22.11) Provide details of the methods, conversion factors used and the total commodity volume in the original unit

Volumes were compiled from procurement records for the reporting year, covering Zorlu Enerji Elektrik Üretim A.Ş. and its consolidated subsidiaries, and converted from kilograms to metric tons by dividing by 1,000. Product weights were obtained from supplier specifications and delivery documentation. Where a weight was not stated on the documentation, the item was weighed or an equivalent catalogue weight for the same product type was applied. For composite products, the full product weight is reported rather than the commodity fraction alone, which overstates rather than understates the commodity volume and is therefore a conservative treatment. The figures reported in metric tons correspond to 61,806 kilograms of timber products, 1,437 kilograms of rubber and 648 kilograms of coffee in the original unit.

(1.22.12) Form of commodity

Select all that apply

☑ Boards, plywood, engineered wood

☑ Goods not for resale (GNFR)

(1.22.13) % of procurement spend

Select from:

☑ Less than 1%

(1.22.14) % of revenue dependent on commodity

Select from:

☑ Less than 1%

(1.22.15) In the questionnaire setup did you indicate that you are disclosing on this commodity?

Select from:

☑ Yes, disclosing

(1.22.16) Is this commodity considered significant to your business in terms of revenue?

Select from:

☑ No

(1.22.20) Please explain

Zorlu Enerji's core business is electricity generation from geothermal, wind, hydroelectric and solar resources, together with electricity distribution, retail and trading. The company does not produce, process, manufacture or sell any product that embeds this commodity, and derives 0% of its revenue from the commodity or from any derivative or product containing it. Volumes sourced are limited to incidental, non-production operational purchases for internal use, representing well below 0.01% of total procurement spend. We apply a revenue-based materiality assessment: a commodity is considered significant only where revenue dependency or procurement spend on it is material to the business, with an indicative threshold of 1%. Neither condition is met, so the commodity is not considered significant to the business in terms of revenue. Timber sourced during the year consists almost entirely of wood-based office furniture purchased for our electricity distribution business, comprising cabinets, desk sets and chairs installed at our Afyonkarahisar, Bilecik and Kütahya buildings, together with small quantities of wood-based consumables such as pencils and cleaning tool handles used in facility housekeeping. No timber enters our generation, distribution or trading activities as an input. These are standard commercial goods sourced for incidental operational use. No supplier-verified post-consumer recycled content data is available, so recycled content is reported as zero.

Rubber

(1.22.1) Produced and/or sourced

Select from:

☑ Sourced

(1.22.2) Commodity value chain stage

Select all that apply

☑ Processing

(1.22.4) Indicate if you are providing the total commodity volume that is produced and/or sourced

Select from:

☑ Yes, we are providing the total volume

(1.22.5) Total commodity volume (metric tons)

1.44

(1.22.8) Of the total commodity volume, state how much is post-consumer recycled content (metric tons)

0

(1.22.9) Did you convert the total commodity volume from another unit to metric tons?

Select from:

☑ Yes

(1.22.10) Original unit

Select all that apply

☑ Kilogram

(1.22.11) Provide details of the methods, conversion factors used and the total commodity volume in the original unit

Volumes were compiled from procurement records for the reporting year, covering Zorlu Enerji Elektrik Üretim A.Ş. and its consolidated subsidiaries, and converted from kilograms to metric tons by dividing by 1,000. Product weights were obtained from supplier specifications and delivery documentation. Where a weight was not stated on the documentation, the item was weighed or an equivalent catalogue weight for the same product type was applied. For composite products, the full product weight is reported rather than the commodity fraction alone, which overstates rather than understates the commodity volume and is therefore a conservative treatment. The figures reported in metric tons correspond to 61,806 kilograms of timber products, 1,437 kilograms of rubber and 648 kilograms of coffee in the original unit.

(1.22.12) Form of commodity

Select all that apply

☑ Plates, sheets, strips, rods of vulcanized rubber

☑ Tires

(1.22.13) % of procurement spend

Select from:

☑ Less than 1%

(1.22.14) % of revenue dependent on commodity

Select from:

☑ Less than 1%

(1.22.15) In the questionnaire setup did you indicate that you are disclosing on this commodity?

Select from:

☑ Yes, disclosing

(1.22.16) Is this commodity considered significant to your business in terms of revenue?

Select from:

☑ No

(1.22.20) Please explain

Zorlu Enerji's core business is electricity generation from geothermal, wind, hydroelectric and solar resources, together with electricity distribution, retail and trading. The company does not produce, process, manufacture or sell any product that embeds this commodity, and derives 0% of its revenue from the commodity or from any derivative or product containing it. Volumes sourced are limited to incidental, non-production operational purchases for internal use, representing well below 0.01% of total procurement spend. We apply a revenue-based materiality assessment: a commodity is considered significant only where revenue dependency or procurement spend on it is material to the business, with an indicative threshold of 1%. Neither condition is met, so the commodity is not considered significant to the business in terms of revenue. Rubber sourced during the year consists of vehicle and forklift tyres and minor rubber components such as sheets, plugs and seals used for on-site logistics and equipment maintenance. These are largely synthetic or mixed compounds and are not procured as a raw natural rubber input. These are standard commercial goods sourced for incidental operational use. No supplier-verified post-consumer recycled content data is available, so recycled content is reported as zero.

Coffee

(1.22.1) Produced and/or sourced

Select from:

☑ Sourced

(1.22.2) Commodity value chain stage

Select all that apply

☑ Processing

(1.22.4) Indicate if you are providing the total commodity volume that is produced and/or sourced

Select from:

☑ Yes, we are providing the total volume

(1.22.5) Total commodity volume (metric tons)

0.65

(1.22.8) Of the total commodity volume, state how much is post-consumer recycled content (metric tons)

0

(1.22.9) Did you convert the total commodity volume from another unit to metric tons?

Select from:

☑ Yes

(1.22.10) Original unit

Select all that apply

☑ Kilogram

(1.22.11) Provide details of the methods, conversion factors used and the total commodity volume in the original unit

Volumes were compiled from procurement records for the reporting year, covering Zorlu Enerji Elektrik Üretim A.Ş. and its consolidated subsidiaries, and converted from kilograms to metric tons by dividing by 1,000. Product weights were obtained from supplier specifications and delivery documentation. Where a weight was not stated on the documentation, the item was weighed or an equivalent catalogue weight for the same product type was applied. For composite products, the full product weight is reported rather than the commodity fraction alone, which overstates rather than understates the commodity volume and is therefore a conservative treatment. The figures reported in metric tons correspond to 61,806 kilograms of timber products, 1,437 kilograms of rubber and 648 kilograms of coffee in the original unit.

(1.22.12) Form of commodity

Select all that apply

☑ Coffee beans

☑ Coffee extracts

(1.22.13) % of procurement spend

Select from:

☑ Less than 1%

(1.22.14) % of revenue dependent on commodity

Select from:

☑ Less than 1%

(1.22.15) In the questionnaire setup did you indicate that you are disclosing on this commodity?

Select from:

☑ Yes, disclosing

(1.22.16) Is this commodity considered significant to your business in terms of revenue?

Select from:

☑ No

(1.22.20) Please explain

Zorlu Enerji's core business is electricity generation from geothermal, wind, hydroelectric and solar resources, together with electricity distribution, retail and trading. The company does not produce, process, manufacture or sell any product that embeds this commodity, and derives 0% of its revenue from the commodity or from any derivative or product containing it. Volumes sourced are limited to incidental, non-production operational purchases for internal use, representing well below 0.01% of total procurement spend. We apply a revenue-based materiality assessment: a commodity is considered significant only where revenue dependency or procurement spend on it is material to the business, with an indicative threshold of 1%. Neither condition is met, so the commodity is not considered significant to the business in terms of revenue. Coffee sourced during the year is roasted and ground coffee for staff consumption at our offices and generation sites, together with a small number of coffee machines. It is not an input to any product or service we supply. These are standard commercial goods sourced for incidental operational use. No supplier-verified post-consumer recycled content data is available, so recycled content is reported as zero.
[Fixed row]

(1.24) Has your organization mapped its value chain?

(1.24.1) Value chain mapped

Select from:

☑ Yes, we have mapped or are currently in the process of mapping our value chain

(1.24.2) Value chain stages covered in mapping

Select all that apply

☑ Upstream value chain

(1.24.3) Highest supplier tier mapped

Select from:

☑ Tier 1 suppliers

(1.24.4) Highest supplier tier known but not mapped

Select from:

☑ Tier 2 suppliers

(1.24.6) Smallholder inclusion in mapping

Select from:

☑ Smallholders not relevant, and not included

(1.24.7) Description of mapping process and coverage

Zorlu Enerji employs a comprehensive supplier mapping process to ensure effective oversight of its upstream value chain, focusing on sustainability, risk management, and compliance. The process is driven by the Supplier Assurance System (SAS), which identifies critical suppliers based on a cost threshold of over 1,000,000 TRY and strategic importance, such as suppliers involved in the procurement of main equipment and TurnKey project providers. The mapping process evaluates suppliers' compliance with key international standards, including ISO 26000 (Social Responsibility) and ISO 14001 (Environmental Management). This ensures that suppliers align with Zorlu Enerji's commitment to ethical business practices and environmental stewardship. Data collected during the mapping process includes suppliers' environmental performance, social responsibility initiatives, and overall risk profile. This data is captured through a combination of supplier self-assessments, audits, and third-party certifications, ensuring a thorough evaluation of suppliers' contributions to Zorlu Enerji's sustainability goals. The mapping also integrates digital tools, such as supplier management software, to track and monitor supplier performance across various stages of the value chain. These tools enable Zorlu Enerji to have real-time insights into supplier operations and facilitate proactive risk management. Additionally, the coverage of this mapping includes

Tier 1 suppliers, with ongoing efforts to extend visibility into Tier 2 suppliers to ensure deeper transparency across the supply chain. Zorlu Enerji's supplier mapping is not only full in its scope but also an evolving process, regularly updated to reflect changes in supplier operations, industry standards, and emerging environmental risks. The company ensures continuous engagement with its suppliers to maintain high standards in sustainability and to identify areas for improvement, fostering long-term partnerships aligned with the company's net-zero ambitions.
[Fixed row]

(1.24.2) Which commodities has your organization mapped in your upstream value chain (i.e., supply chain)?

Timber products

(1.24.2.1) Value chain mapped for this sourced commodity

Select from:
☑ Yes

(1.24.2.2) Highest supplier tier mapped for this sourced commodity

Select from:
☑ Tier 1 suppliers

(1.24.2.3) % of tier 1 suppliers mapped

Select from:
☑ 100%

(1.24.2.7) Highest supplier tier known but not mapped for this sourced commodity

Select from:
☑ All supplier tiers known have been mapped for this sourced commodity

Rubber

(1.24.2.1) Value chain mapped for this sourced commodity

Select from:

☑ Yes

(1.24.2.2) Highest supplier tier mapped for this sourced commodity

Select from:

☑ Tier 1 suppliers

(1.24.2.3) % of tier 1 suppliers mapped

Select from:

☑ 100%

(1.24.2.7) Highest supplier tier known but not mapped for this sourced commodity

Select from:

☑ All supplier tiers known have been mapped for this sourced commodity

Coffee

(1.24.2.1) Value chain mapped for this sourced commodity

Select from:

☑ Yes

(1.24.2.2) Highest supplier tier mapped for this sourced commodity

Select from:

☑ Tier 1 suppliers

(1.24.2.3) % of tier 1 suppliers mapped

Select from:

☑ 100%

(1.24.2.7) Highest supplier tier known but not mapped for this sourced commodity

Select from:

☑ All supplier tiers known have been mapped for this sourced commodity

[Fixed row]

C2. Identification, assessment, and management of dependencies, impacts, risks, and opportunities

(2.1) How does your organization define short-, medium-, and long-term time horizons in relation to the identification, assessment, and management of your environmental dependencies, impacts, risks, and opportunities?

Short-term

(2.1.1) From (years)

0

(2.1.3) To (years)

1

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Zorlu Enerji defines the short-term horizon as a 0 to 1-year period, focusing on immediate risks and opportunities that could impact our operations. This time frame is critical for addressing acute physical risks, such as extreme weather events—storms, droughts, floods—that may directly affect our infrastructure and supply chain. These risks require swift mitigation strategies to ensure operational resilience and business continuity. In addition to physical risks, we closely monitor emerging local and international regulations related to climate change and environmental compliance. This includes policy changes, carbon pricing mechanisms, and industry-specific environmental mandates that could affect our short-term financial planning and operational decisions. By maintaining a proactive stance, we can adjust swiftly to new regulatory developments and incorporate them into our business models. Short-term planning forms the backbone of our financial and operational strategies, ensuring our business targets are aligned with environmental sustainability. This period allows us to allocate resources effectively, setting the stage for budget allocation, risk mitigation, and meeting near-term operational goals. It also provides a foundation for building long-term resilience and adapting our business in a rapidly evolving regulatory and environmental landscape.

Medium-term

(2.1.1) From (years)

1

(2.1.3) To (years)

5

(2.1.4) How this time horizon is linked to strategic and/or financial planning

The medium-term horizon for Zorlu Enerji spans 1 to 5 years, aligned with the company's business strategy review and update cycles. This period is critical for implementing board-level strategies and decisions that drive the transition to a low-carbon economy. It encompasses strategic initiatives focused on sustainability, decarbonization, and resource efficiency, reflecting the company's commitment to long-term environmental goals. During this time frame, we prioritize investments and projects that align with our financial forecasts and sustainability targets, including expanding renewable energy generation and enhancing energy efficiency. The medium term also allows for the identification and capitalization of emerging opportunities, particularly in sectors such as electric vehicle (EV) infrastructure, which we expect to play a significant role in our future growth. Our periodic review of risks and opportunities ensures that we remain agile and responsive to evolving market conditions, regulatory changes, and technological advancements. As part of our medium-term outlook, we are particularly focused on scaling our EV charging station network, which represents a key opportunity to contribute to the low-carbon transition while strengthening our market position.

Long-term

(2.1.1) From (years)

5

(2.1.2) Is your long-term time horizon open ended?

Select from:

☑ Yes

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Zorlu Enerji's long-term horizon spans beyond 5 years and is crucial for our strategic planning, guiding decisions on customer behavior, evolving market dynamics, and shifting production models. This period allows us to implement significant changes in asset management, long-term investment strategies, and innovative product development that align with our vision for a sustainable future. It also plays a key role in achieving our decarbonization targets as part of the broader energy transition process. In this time frame, the full impact of climate change is expected to become more pronounced, influencing not just our operations but also the wider industry landscape. We anticipate that long-term risks and opportunities will be shaped by technological advancements, pushing us to stay at the forefront of innovation. Research and development (R&D) will be critical in this regard, as breakthroughs in renewable energy, energy storage, and smart grid technologies will define our ability to meet and exceed our sustainability goals. Additionally, the long-term horizon reflects our commitment to addressing systemic changes in customer expectations and regulatory environments. This enables us to prepare for shifts in demand, adopt emerging technologies, and explore new markets. It also aligns with our focus on integrating advanced digital solutions and fostering collaborative partnerships to ensure a resilient and future-ready business model.
[Fixed row]

(2.2) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts?

	Process in place	Dependencies and/or impacts evaluated in this process
	Select from: ☑ Yes	*Select from:* ☑ Both dependencies and impacts

[Fixed row]

(2.2.1) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities?

	Process in place	Risks and/or opportunities evaluated in this process	Is this process informed by the dependencies and/or impacts process?
	Select from: ☑ Yes	*Select from:* ☑ Both risks and opportunities	*Select from:* ☑ Yes

[Fixed row]

(2.2.2) Provide details of your organization's process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities.

Row 1

(2.2.2.1) Environmental issue

Select all that apply

☑ Climate change

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☑ Direct operations

☑ Upstream value chain

☑ Downstream value chain

(2.2.2.4) Coverage

Select from:

☑ Full

(2.2.2.5) Supplier tiers covered

Select all that apply

☑ Tier 1 suppliers

☑ Tier 2 suppliers

(2.2.2.7) Type of assessment

Select from:

☑ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

☑ Annually

(2.2.2.9) Time horizons covered

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(2.2.2.10) Integration of risk management process

Select from:

☑ Integrated into multi-disciplinary organization-wide risk management process

(2.2.2.11) Location-specificity used

Select all that apply

☑ Site-specific

(2.2.2.12) Tools and methods used

Enterprise Risk Management

☑ COSO Enterprise Risk Management Framework

☑ Enterprise Risk Management

☑ ISO 31000 Risk Management

☑ Risk models

International methodologies and standards

☑ Environmental Impact Assessment

☑ IPCC Climate Change Projections
☑ ISO 14001 Environmental Management Systems

Databases
☑ IUCN Red List of Ecosystems

Other
☑ Desk-based research
☑ External consultants
☑ Materiality assessment
☑ Partner and stakeholder consultation/analysis
☑ Scenario analysis

(2.2.2.15) Risk types and criteria considered

Acute physical
☑ Drought
☑ Flood (coastal, fluvial, pluvial, ground water)
☑ Heat wave
☑ Storm (including blizzards, dust, and sandstorms)
☑ Wildfires

Chronic physical
☑ Changing precipitation patterns and types (rain, hail, snow/ice)
☑ Changing temperature (air, freshwater, marine water)
☑ Increased severity of extreme weather events

Policy
☑ Carbon pricing mechanisms
☑ Changes to national legislation

Market

☑ Changing customer behavior

☑ Uncertainty in market signals

Reputation

☑ Increased concern and/or negative feedback from partners and stakeholders

Technology

☑ Transition to lower emissions technology and products

Liability

☑ Non-compliance with regulations and legislation

(2.2.2.16) Partners and stakeholders considered

Select all that apply

☑ NGOs

☑ Customers

☑ Employees

☑ Investors

☑ Suppliers

☑ Regulators

☑ Local communities

(2.2.2.17) Has this process changed since the previous reporting year?

Select from:

☑ No

(2.2.2.18) Further details of process

Climate-related dependencies, impacts, risks and opportunities are identified, assessed and managed through Zorlu Enerji's centralized enterprise risk management (ERM) system, designed in line with the COSO Internal Control – Integrated Framework and ISO 31000, and consolidated at Zorlu Holding level so that risks are managed with an organization-wide, multi-disciplinary view. The assessment is conducted under the Türkiye Sustainability Reporting Standards (TSRS), based on IFRS S1 and S2, and covers 100% of operations across direct operations and the upstream and downstream value chain. Physical and transition risks are evaluated using scenario analysis, including a 1.5°C scenario used to align CAPEX/OPEX allocation, complemented by a double materiality analysis (ESRS/EFRAG

methodology). Risks are assessed over short- (0–1 yr), medium- (1–5 yr) and long-term (+5 yr) horizons, quantified through probability/impact analysis against a defined risk appetite, and reviewed at least annually with continuous monitoring. Board-level oversight and climate-linked executive incentives are in place. Both qualitative descriptions and quantitative indicators (e.g. GHG inventory under independent assurance) inform the significance determination; a risk/opportunity is deemed substantive where it materially affects financial position, performance or cash flows. Ecological thresholds and tipping points are considered through the scenario framework. The four NGFS scenarios applied are anchored on warming outcomes relative to the Paris Agreement 1.5°C threshold, and physical hazard indices are applied at asset level so that non-linear increases in hazard frequency beyond that threshold are reflected rather than assumed to scale linearly. Because climate risks are registered in the same enterprise risk register as operational, financial and regulatory risks and scored on the same probability and impact matrix against a single risk appetite, their relative significance against non-environmental risks is directly comparable, and prioritisation for management attention follows from that common scoring. Supplier tiers: tier 1 suppliers are directly mapped and assessed; tier 2 exposure is known but not separately mapped and is brought into the assessment indirectly through critical tier 1 suppliers, which is why coverage is reported as full while direct mapping extends to tier 1.

Row 2

(2.2.2.1) Environmental issue

Select all that apply

☑ Water

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☑ Direct operations

☑ Upstream value chain

☑ Downstream value chain

(2.2.2.4) Coverage

Select from:

☑ Full

(2.2.2.5) Supplier tiers covered

Select all that apply

☑ Tier 1 suppliers

☑ Tier 2 suppliers

(2.2.2.7) Type of assessment

Select from:

☑ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

☑ Annually

(2.2.2.9) Time horizons covered

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(2.2.2.10) Integration of risk management process

Select from:

☑ Integrated into multi-disciplinary organization-wide risk management process

(2.2.2.11) Location-specificity used

Select all that apply

☑ Site-specific

(2.2.2.12) Tools and methods used

Commercially/publicly available tools

☑ Water Footprint Network Assessment tool

Enterprise Risk Management

☑ Enterprise Risk Management

☑ ISO 31000 Risk Management

International methodologies and standards

☑ ISO 14001 Environmental Management Systems

☑ ISO 14046 Environmental Management – Water footprint

Other

☑ Materiality assessment

☑ Partner and stakeholder consultation/analysis

☑ Scenario analysis

(2.2.2.15) Risk types and criteria considered

Acute physical

☑ Drought

☑ Flood (coastal, fluvial, pluvial, ground water)

Chronic physical

☑ Declining water quality

☑ Groundwater depletion

☑ Seasonal supply variability/interannual variability

☑ Water availability at a basin/catchment level

☑ Water stress

Policy

☑ Changes to national legislation

☑ Increased pricing of water

☑ Regulation of discharge quality/volumes

☑ Statutory water withdrawal limits/changes to water allocation

Market

☑ Uncertainty in market signals

Reputation

☑ Increased concern and/or negative feedback from partners and stakeholders

☑ Stakeholder conflicts concerning water resources at a basin/catchment level

Technology

☑ Dependency on water-intensive energy sources

☑ Transition to water efficient and low water intensity technologies and products

Liability

☑ Exposure to sanctions and litigation

☑ Non-compliance with regulations and legislation

(2.2.2.16) Partners and stakeholders considered

Select all that apply

☑ NGOs

☑ Customers

☑ Employees

☑ Investors

☑ Suppliers

☑ Regulators

☑ Local communities

☑ Water utilities at a local level

☑ Other water users at the basin/catchment level

(2.2.2.17) Has this process changed since the previous reporting year?

Select from:

☑ No

(2.2.2.18) Further details of process

Risks, opportunities, impacts, and dependencies related to climate change, biodiversity, and water are identified and prioritized through double materiality studies within the scope of corporate risk management efforts, with the participation of relevant stakeholders (partners, customers, employees, investors, regulators, financiers, local communities, suppliers). The outcomes are compared with the company's sustainability strategy, providing opportunities for strategy review. The value chain, including direct operations as well as downstream and upstream processes, is incorporated into the scope. Qualitative and quantitative methods are used to evaluate risks, opportunities, impacts, and dependencies, with time horizons set as short, medium, and long-term depending on the magnitude of the issues. Feedback and inputs from all stakeholders are evaluated quantitatively across environmental and social impacts (X-axis) and financial impacts (Y-axis) using a methodology co-developed with the Risk Management Directorate, and priorities are determined accordingly. This work is carried out organization-wide in a multi-disciplinary manner, including critical suppliers, and is prioritized based on site-specific, local, sub-national, and national considerations. The assessment process involves extensive desk-based research, field studies, and the use of external consultants, applying standards, guidelines, and methodologies specific to the subject (e.g., IBAT, WWF, IUCN Red List for biodiversity risks, IPCC projections, EIAs, ISO 14064, ISO 14046, WRI tools, and databases for climate and water risks). The process includes determining the magnitude of risks, oppourtunities and impacts such as physical, chronic, and transition risks. The priority topics resulting from the study are reviewed and fine-tuned by the sustainability committee, which reports to the Board of Directors. The study is managed by the Assistant General Manager of Risk Management at Zorlu Holding, the Sustainability Director of Zorlu Enerji, and the Assistant General Manager of Finance. Ecological thresholds are applied explicitly at basin level. A baseline water stress ratio at or above 40% under the WRI Aqueduct Water Risk Atlas, and a water availability risk score above 3.4 under the WWF Water Risk Filter, are the thresholds above which a site is classified as operating in a water-stressed basin and subjected to enhanced assessment. For geothermal operations, reservoir pressure and mass balance function as an operational tipping point: reinjection volumes are managed so that extraction remains within the reservoir's replenishment capacity, since crossing that point would cause irreversible reservoir decline rather than a recoverable reduction in output. Supplier tiers: tier 1 suppliers are directly mapped and assessed; tier 2 exposure is known but not separately mapped and is brought into the assessment indirectly through critical tier 1 suppliers, which is why coverage is reported as full while direct mapping extends to tier 1.

Row 3

(2.2.2.1) Environmental issue

Select all that apply

☑ Biodiversity

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

☑ Dependencies

☑ Impacts
☑ Risks
☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply
☑ Direct operations
☑ Upstream value chain
☑ Downstream value chain

(2.2.2.4) Coverage

Select from:
☑ Full

(2.2.2.5) Supplier tiers covered

Select all that apply
☑ Tier 1 suppliers
☑ Tier 2 suppliers

(2.2.2.7) Type of assessment

Select from:
☑ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:
☑ Annually

(2.2.2.9) Time horizons covered

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(2.2.2.10) Integration of risk management process

Select from:

☑ Integrated into multi-disciplinary organization-wide risk management process

(2.2.2.11) Location-specificity used

Select all that apply

☑ Site-specific

(2.2.2.12) Tools and methods used

Commercially/publicly available tools

☑ IBAT – Integrated Biodiversity Assessment Tool

☑ LEAP (Locate, Evaluate, Assess and Prepare) approach, TNFD

☑ WWF Biodiversity Risk Filter

Enterprise Risk Management

☑ Enterprise Risk Management

☑ ISO 31000 Risk Management

International methodologies and standards

☑ Environmental Impact Assessment

☑ ISO 14001 Environmental Management Systems

Databases

☑ IUCN Red List of Ecosystems

Other

☑ Materiality assessment

☑ Partner and stakeholder consultation/analysis

☑ Scenario analysis

(2.2.2.15) Risk types and criteria considered

Acute physical

☑ Disease or pests

☑ Drought

☑ Flood (coastal, fluvial, pluvial, ground water)

☑ Invasive species

☑ Wildfires

Chronic physical

☑ Change in land/freshwater/ocean use

☑ Declining ecosystem services

☑ Increased ecosystem vulnerability

☑ Operations in or adjacent to areas important for biodiversity

Policy

☑ Changes to national legislation

☑ Increased difficulty in obtaining operations permits

☑ Protected area designation

Market

☑ Changing customer behavior

Reputation

☑ Increased concern and/or negative feedback from partners and stakeholders

☑ Stigmatization of sector

Technology

☑ Lack of access to data or monitoring systems

Liability

☑ Non-compliance with regulations and legislation

(2.2.2.16) Partners and stakeholders considered

Select all that apply

☑ NGOs

☑ Customers

☑ Employees

☑ Investors

☑ Suppliers

☑ Regulators

☑ Local communities

(2.2.2.17) Has this process changed since the previous reporting year?

Select from:

☑ No

(2.2.2.18) Further details of process

Biodiversity-related dependencies, impacts, risks and opportunities are assessed through a dedicated Biodiversity Risk Assessment and Management approach, aligned with the TNFD, and integrated into the organization-wide ERM system (COSO / ISO 31000). The process explicitly distinguishes dependency-based risks (operational reliance on ecosystem services such as water, soil fertility and climate regulation) from impact-based risks (effects of operations on ecosystems, species and habitats). It covers the full value chain across four scopes: direct operational impacts, joint ventures, ecosystems adjacent to sites (0–50 km buffer), and upstream/downstream supply chain. Site-level, data-driven screening uses the WWF Biodiversity Risk Filter (33 indicators), the EUNIS habitat classification, IBAT (IUCN/UNEP data) and WRI Aqueduct, with field surveys (flora/fauna inventories, habitat mapping, species monitoring) managed under the Biodiversity and Ecosystem Management System (BEYS on QDMS), structured in line with IFC Performance Standard 6. Site-specific Biodiversity Action Plans translate findings into action. Assessment is qualitative and quantitative, covers short/medium/long-term horizons, and underpins the commitment to become a Net Positive Impact company by 2035. Significance is determined via the double materiality analysis. Ecological thresholds and tipping points are addressed directly in the screening. Sites are tested against protected areas and Key Biodiversity Areas using IBAT and against the 33 indicators of the WWF Biodiversity Risk Filter, with a 0-50 km buffer applied so that effects on adjacent ecosystems are captured rather than only effects within the site boundary. Where screening identifies critical habitat under IFC Performance Standard 6, no-net-loss and net-gain requirements apply; these function as the threshold beyond which an impact is treated as unacceptable rather than as something to be mitigated incrementally, and they determine whether a Biodiversity Action Plan targets mitigation or avoidance. Supplier tiers: tier 1 suppliers

are directly mapped and assessed; tier 2 exposure is known but not separately mapped and is brought into the assessment indirectly through critical tier 1 suppliers, which is why coverage is reported as full while direct mapping extends to tier 1.

Row 4

(2.2.2.1) Environmental issue

Select all that apply

☑ Forests

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☑ Direct operations

☑ Upstream value chain

(2.2.2.4) Coverage

Select from:

☑ Full

(2.2.2.5) Supplier tiers covered

Select all that apply

☑ Tier 1 suppliers

☑ Tier 2 suppliers

(2.2.2.7) Type of assessment

Select from:

☑ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

☑ Annually

(2.2.2.9) Time horizons covered

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(2.2.2.10) Integration of risk management process

Select from:

☑ Integrated into multi-disciplinary organization-wide risk management process

(2.2.2.11) Location-specificity used

Select all that apply

☑ Site-specific

(2.2.2.12) Tools and methods used

Commercially/publicly available tools

☑ IBAT – Integrated Biodiversity Assessment Tool

☑ LEAP (Locate, Evaluate, Assess and Prepare) approach, TNFD

☑ WWF Biodiversity Risk Filter

Enterprise Risk Management
☑ Enterprise Risk Management
☑ ISO 31000 Risk Management

International methodologies and standards
☑ Environmental Impact Assessment
☑ ISO 14001 Environmental Management Systems

Databases
☑ IUCN Red List of Ecosystems

Other
☑ Materiality assessment
☑ Partner and stakeholder consultation/analysis
☑ Scenario analysis

(2.2.2.15) Risk types and criteria considered

Acute physical
☑ Drought
☑ Flood (coastal, fluvial, pluvial, ground water)
☑ Wildfires

Chronic physical
☑ Change in land/freshwater/ocean use
☑ Land loss to desertification
☑ Scarcity of land resources

Policy
☑ Changes to national legislation

☑ Increased difficulty in obtaining operations permits
☑ Protected area designation

Market
☑ Limited visibility of embedded commodities
☑ Uncertainty about commodity origin and/or legality

Reputation
☑ Increased concern and/or negative feedback from partners and stakeholders
☑ Stigmatization of sector

Technology
☑ Lack of access to data or monitoring systems

Liability
☑ Moratoria and voluntary agreement
☑ Non-compliance with regulations and legislation

(2.2.2.16) Partners and stakeholders considered

Select all that apply

☑ NGOs
☑ Customers
☑ Employees
☑ Investors
☑ Suppliers
☑ Regulators
☑ Local communities

(2.2.2.17) Has this process changed since the previous reporting year?

Select from:

☑ No

(2.2.2.18) Further details of process

As a renewable energy company, Zorlu Enerji does not produce, process or sell forest-risk commodities as a material input; forests exposure is therefore assessed primarily as a land-use, deforestation and habitat risk arising from siting and operating generation assets (geothermal, wind, hydro, solar) and grid infrastructure, and to a limited extent from the upstream supply chain. The assessment is governed by the company's Biodiversity Conservation Policy and Anti-Deforestation Policy and is integrated into the organization-wide ERM system (COSO / ISO 31000), aligned with the TNFD. Land-use change, protected-area proximity and habitat sensitivity are screened at site level using IBAT, the WWF Biodiversity Risk Filter and EUNIS, supported by Environmental Impact Assessments and field surveys under the BEYS management system (IFC PS-6), with site-specific Biodiversity Action Plans. Assessment is qualitative and quantitative, covers short/medium/long-term horizons, and feeds the Net Positive Impact by 2035 commitment. Significance is determined through the double materiality analysis; forest-risk commodity procurement is negligible and not considered material to the business. Ecological thresholds and tipping points are addressed through protected-area and critical-habitat screening under IBAT and IFC Performance Standard 6, and through the Anti-Deforestation Policy, under which deforestation and the conversion of natural ecosystems are treated as a zero-tolerance threshold rather than as a gradual impact to be optimised. Where forest land use is unavoidable for grid or generation infrastructure, compensatory afforestation is applied so that the area of forest cover is restored. Supplier tiers: tier 1 suppliers are directly mapped and assessed; tier 2 exposure is known but not separately mapped and is brought into the assessment indirectly through critical tier 1 suppliers, which is why coverage is reported as full while direct mapping extends to tier 1.
[Add row]

(2.2.7) Are the interconnections between environmental dependencies, impacts, risks and/or opportunities assessed?

(2.2.7.1) Interconnections between environmental dependencies, impacts, risks and/or opportunities assessed

Select from:
☑ Yes

(2.2.7.2) Description of how interconnections are assessed

At Zorlu Enerji, assessing the interconnections between environmental dependencies, impacts, risks, and opportunities is integral to our sustainability framework. As a vertically integrated energy company, we operate across the entire energy value chain—from generation to transmission, distribution, and trading—requiring a comprehensive approach to environmental factors. We apply a multi-layered process to evaluate how various environmental aspects interact. For example, the interconnection between climate change, water resources, and energy production is critically analyzed. Our geothermal and hydropower plants depend heavily on water availability, making them vulnerable to climate change or regulatory shifts. To manage these risks, we assess trade-offs between water conservation and energy generation goals. This assessment process is supported by cross-functional teams across sustainability, operations, and risk management. We align with international standards such as the Global Reporting Initiative (GRI) and the Task Force on Climate-related Financial Disclosures (TCFD). These standards help us identify both risks and synergies. For instance, increasing renewable energy strengthens our decarbonization goals and boosts resilience to market shifts. The assessment is integrated into our environmental risk evaluations and business planning cycles, which are reviewed by senior management. These assessments also inform our financial forecasting, helping evaluate long-term impacts of environmental interdependencies on performance. Technology plays a key role in mitigating risks and capturing opportunities. Our investments in smart systems, such as electric vehicle (EV) charging infrastructure, reduce GHG emissions while supporting the low-carbon transportation transition. This highlights the interconnection between environmental impacts and business opportunities. Zorlu Enerji continuously assesses synergies and trade-offs between environmental factors. For example, the increasing frequency of extreme weather events due to climate change has led

to improved asset management strategies. We assess how these dependencies affect infrastructure, leading to investments in climate resilience and innovative renewable technologies. Challenges in assessing interconnections, such as conflicting environmental impacts, are addressed by prioritizing our long-term sustainability goals. By engaging with stakeholders, including regulators and communities, we mitigate risks while enhancing positive contributions. This dynamic approach helps balance immediate risks with long-term opportunities, ensuring Zorlu Enerji's resilience in a changing environmental landscape.
[Fixed row]

(2.3) Have you identified priority locations across your value chain?

(2.3.1) Identification of priority locations

Select from:

☑ Yes, we have identified priority locations

(2.3.2) Value chain stages where priority locations have been identified

Select all that apply

☑ Direct operations

(2.3.3) Types of priority locations identified

Sensitive locations

☑ Areas important for biodiversity

☑ Areas of limited water availability, flooding, and/or poor quality of water

(2.3.4) Description of process to identify priority locations

To assess risks related to biodiversity and water crises, we utilize the WWF Biodiversity Risk Filter and WWF Water Risk Filter. Both tools are designed to provide a broad overview of potential biodiversity and water-related risks across various geographical locations. It helps us to understand our potential impacts and dependencies on natural resources, enabling us to identify high-risk areas and prioritize actions to mitigate these risks. The WWF Risk Filter is particularly useful for its ability to offer a macro-level assessment, which is essential for strategic decision-making and prioritization. Zorlu Enerji uses these tools for dependency-related assessment for both biodiversity and water. In addition to the WWF Risk Filter, we employ the Integrated Biodiversity Assessment Tool (IBAT) for more detailed and impact-related risks assessments. IBAT provides essential information on globally recognized areas of biodiversity importance, such as protected areas and key biodiversity areas (KBAs). This tool allows us to evaluate the potential impacts of our operations on these sensitive areas at a granular level, facilitating informed 11

decisions to minimize adverse effects on biodiversity. The detailed insights from IBAT are crucial for project-specific assessments and ensuring compliance with international biodiversity standards.

(2.3.5) Will you be disclosing a list/spatial map of priority locations?

Select from:

☑ Yes, we will be disclosing the list/geospatial map of priority locations

(2.3.6) Provide a list and/or spatial map of priority locations

Zorlu Enerji Water Bidiversity Risk Report.pdf
[Fixed row]

(2.4) How does your organization define substantive effects on your organization?

Risks

(2.4.1) Type of definition

Select all that apply

☑ Qualitative

☑ Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:

☑ Revenue

(2.4.3) Change to indicator

Select from:

☑ % decrease

(2.4.4) % change to indicator

Select from:

☑ 1-10

(2.4.6) Metrics considered in definition

Select all that apply

☑ Frequency of effect occurring

☑ Time horizon over which the effect occurs

☑ Likelihood of effect occurring

(2.4.7) Application of definition

Zorlu Enerji defines a substantive effect arising from a risk as a financial effect equivalent to a decrease of 2.1% or more in annual consolidated revenue. For the reporting year this threshold corresponds to approximately TL 760 million, calculated against consolidated revenue of TL 36,197,416 thousand. The threshold is applied at corporate level: an effect that is significant for an individual asset or business unit is classified as substantive only where it reaches the corporate threshold, either on its own or in aggregate with related effects. The threshold is set by senior management, comprising the Chief Executive Officer and the Zorlu Holding Chief Audit, Control and Risk Officer, on the basis of the consolidated financial statements. Revenue, operating expenses, capital expenditure, financing expenses and EBITDA were all considered as candidate indicators. Revenue was selected because it is comparable across our generation, distribution and retail supply activities, is least distorted by financing structure and inflation accounting adjustments, and allows the financial effect of a risk to be presented on a basis investors can readily assess. Three further metrics are applied alongside the threshold. Likelihood: each identified risk is scored on the corporate risk matrix and an effect is treated as substantive only where the assessed likelihood is medium or higher. Time horizon: effects are assessed over the short (0-1 years), medium (1-5 years) and long (5 years and beyond) term, and a risk is substantive if the threshold is reached in any horizon. Frequency: recurring effects are aggregated across the relevant horizon rather than assessed as single events, so that repeated sub-threshold effects can together become substantive. For operational prioritisation, financial consequences are additionally classified as low (below TL 30 million), medium (TL 30-300 million) and high (TL 300 million and above). These categories govern day-to-day escalation and sit below the corporate threshold, so any effect meeting the 2.1% test is by definition also high impact. The same definition applies to all environmental issues, to both inherent and residual risk, and across direct operations and the value chain. Where a risk is modelled over a multi-year horizon, the cumulative effect is compared against forecast consolidated revenue for the same period. It is reviewed annually within the enterprise risk management cycle.

Opportunities

(2.4.1) Type of definition

Select all that apply

☑ Qualitative

☑ Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:

☑ Revenue

(2.4.3) Change to indicator

Select from:

☑ % increase

(2.4.4) % change to indicator

Select from:

☑ 1-10

(2.4.6) Metrics considered in definition

Select all that apply

☑ Frequency of effect occurring

☑ Time horizon over which the effect occurs

☑ Likelihood of effect occurring

(2.4.7) Application of definition

Zorlu Enerji defines a substantive effect arising from an opportunity as a financial effect equivalent to an increase of 2.1% or more in annual consolidated revenue, mirroring the threshold applied to risks. For the reporting year this corresponds to approximately TL 760 million, calculated against consolidated revenue of TL 36,197,416 thousand. Applying the same indicator and the same magnitude to both risks and opportunities ensures that the two are assessed on a comparable basis and can be weighed against each other in capital allocation decisions. The threshold is applied at corporate level. An opportunity that is significant for an individual asset or business line is classified as substantive only where it reaches the corporate threshold, either on its own or in aggregate with related opportunities. In practice, opportunities of this magnitude arise through capacity additions in renewable generation and through customer acquisition in electricity supply and electric vehicle charging; market share is used as the leading operational indicator, with an increase of 1% or more in the relevant segment typically corresponding to a revenue effect at or above the substantive threshold. Three further metrics are applied alongside the threshold. Likelihood is assessed against market trends, customer demand for low-carbon energy services and the maturity of the underlying investment, and an opportunity is treated as substantive only where the assessed likelihood is medium or higher. Time horizon is predominantly medium-term (1-5 years), reflecting the period required to commission new capacity and integrate new energy services into the portfolio; opportunities expected to be realised beyond this period are assessed over the long term. Frequency is monitored through periodic market assessment, with recurring effects aggregated across the relevant horizon rather than treated as single events. Opportunities meeting this threshold are

escalated through the same governance route as substantive risks and are reported to the Sustainability Committee. The definition is applied consistently across all environmental issues - climate change, water, forests and biodiversity - and across direct operations and the upstream and downstream value chain, and is reviewed annually as part of the enterprise risk management cycle.
[Add row]

(2.5) Does your organization identify and classify potential water pollutants associated with its activities that could have a detrimental impact on water ecosystems or human health?

(2.5.1) Identification and classification of potential water pollutants

Select from:
☑ Yes, we identify and classify our potential water pollutants

(2.5.2) Details of policies and processes in place to identify and classify potential water pollutants

Indicators and metrics used to identify pollutants. The water quality parameters currently monitored are chemical oxygen demand (COD), biochemical oxygen demand (BOD), total suspended solids (TSS) and pH. These are measured in treated effluent at the sites where biological package treatment plants are in operation (İkizdere HEPP and Alaşehir GPP). At our remaining facilities, domestic wastewater is not discharged to a receiving water body: it is collected in sealed tanks and removed by licensed vacuum tanker to municipal treatment facilities, so no site discharge measurement is applicable. Geothermal fluid is not discharged to surface water — following production it is treated and reinjected into the reservoir, which maintains reservoir balance and removes the pathway by which geothermal-origin constituents could reach surface water bodies. Methodologies and standards used to classify pollutants. Classification is based on the Turkish Water Pollution Control Regulation (SKKY), which defines the applicable pollutant parameters and discharge limit values for our activity types; we have not developed a separate internal classification standard, as the national regulation establishes the relevant thresholds. This is operationalised through our ISO 14001 environmental management system, and our ISO 14046 water footprint assessment provides the methodological frame for evaluating the water quality (degradative) dimension of our footprint alongside water quantity, at site level. How pollutants are monitored and tracked over time. Sampling and analysis are carried out annually by independent accredited laboratories. Results are recorded in our QDMS platform, enabling year-on-year tracking against regulatory limit values and triggering corrective action where a deviation is identified.
[Fixed row]

(2.5.1) Describe how your organization minimizes the adverse impacts of potential water pollutants on water ecosystems or human health associated with your activities.

Row 1

(2.5.1.1) Water pollutant category

Select from:

☑ Other nutrients and oxygen demanding pollutants

(2.5.1.2) Description of water pollutant and potential impacts

Domestic wastewater generated at our generation facilities contains biodegradable organic matter, measured as biochemical oxygen demand (BOD) and chemical oxygen demand (COD), alongside total suspended solids (TSS) and pH, which are analysed in the same effluent samples. If discharged untreated, this organic load would depress dissolved oxygen levels in receiving freshwater bodies, potentially creating hypoxic conditions harmful to aquatic macro- and microfauna and contributing to nutrient enrichment; suspended solids would increase turbidity and reduce light penetration, while pH deviation would alter conditions for aquatic organisms. Several of the river basins in which we operate, in the Aegean, Mediterranean, Eastern and Central Anatolia regions, are classified as high water risk by WRI Aqueduct and the WWF Water Risk Filter, which increases the sensitivity of receiving ecosystems and downstream local populations to organic loading.

(2.5.1.3) Value chain stage

Select all that apply

☑ Direct operations

(2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply

☑ Assessment of critical infrastructure and storage condition (leakages, spillages, pipe erosion etc.) and their resilience

☑ Discharge treatment using sector-specific processes

(2.5.1.5) Indicators for measuring and evaluating the success of the procedure

Select all that apply

☑ Compliance with discharge permits / regulatory limits

(2.5.1.6) Please explain

Biological package treatment plants are in operation at İkizdere HEPP and Alaşehir GPP, where domestic wastewater is treated before discharge. At all remaining facilities there is no discharge to a receiving water body: domestic wastewater is collected in sealed tanks and removed by licensed vacuum tanker operators to municipal treatment facilities. Treated effluent is sampled annually and analysed by independent accredited laboratories for BOD, COD, TSS and pH, within the framework of our ISO 14001 environmental management system and our ISO 14046 water footprint assessment. Results are recorded and tracked year-on-year in

our QDMS platform. Success is evaluated by comparing measured concentrations against the discharge limit values set out in the Turkish Water Pollution Control Regulation (SKKY); a result approaching or exceeding a limit value triggers a corrective action recorded and followed up in QDMS.
[Add row]

C3. Disclosure of risks and opportunities

(3.1) Have you identified any environmental risks which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

Climate change

(3.1.1) Environmental risks identified

Select from:

☑ Yes, only within our direct operations

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

☑ Environmental risks exist, but none with the potential to have a substantive effect on our organization

(3.1.3) Please explain

Zorlu Enerji identifies and assesses climate-related risks annually through the enterprise risk management process described in 2.2.2, covering both inherent risk, before any controls are applied, and residual risk, and extending across direct operations and the upstream and downstream value chain. Transition risks are assessed under four NGFS scenarios - Net Zero, Delayed Transition, A Fragmented World and Current Policies - and physical risks using scenario-specific hazard indices, over the reporting year (2025), short term (2026), medium term (2027-2030) and long term (2031-2040). The assessment is documented in our TSRS-compliant Sustainability Report, which is subject to limited assurance by KPMG under ISAE 3000 and ISAE 3410. Six climate-related risks have been identified, all located in our direct operations: deviation from our Science Based Targets initiative targets, which triggers the coupon adjustment mechanism on our sustainability-linked bond; carbon cost exposure for geothermal generation under the Turkish Emissions Trading System, including non-condensable gas emissions; restriction of SF6 and the transition to alternative switchgear technologies; erosion of retail electricity sales as customers adopt distributed energy resources; extreme precipitation affecting water intake systems at hydroelectric assets; and wildfire-driven outages on the electricity distribution network. Measured against the definition of substantive effect in 2.4 - a financial effect equivalent to 2.1% or more of revenue - one of these reaches the corporate threshold: the erosion of Osmangazi Elektrik Perakende Satis A.S. retail revenue by distributed energy resources, which reaches 2.61% of forecast consolidated revenue over 2031-2040 under the Net Zero pathway. This risk is reported in 3.1.1. No substantive climate-related risk has been identified in the upstream or downstream value chain. Upstream exposure arises principally through procured equipment and services, where carbon cost pass-through and supplier decarbonisation requirements are monitored but remain immaterial relative to total procurement expenditure. Downstream exposure relates to electric vehicle charging demand and grid interaction, which is assessed as an

opportunity rather than a substantive risk at corporate level. Both are reassessed annually, and any risk exceeding the 2.4 threshold in a future cycle will be reported in full.

Forests

(3.1.1) Environmental risks identified

Select from:

☑ No

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

☑ Environmental risks exist, but none with the potential to have a substantive effect on our organization

(3.1.3) Please explain

Zorlu Enerji identifies and assesses forest-related risks annually through the enterprise risk management process described in 2.2.2, covering both inherent risk, before any controls are applied, and residual risk, and extending to the upstream value chain through supplier-level mapping of forest risk commodity exposure. Forest-related risks have been identified. In the upstream value chain they arise through the forest risk commodities we source, reported in 8.2: timber products, rubber and coffee, totalling approximately 63.9 tonnes in the reporting year, of which 61.8 tonnes are timber products consisting principally of wood-based office furniture procured for our electricity distribution business. In direct operations they arise through land use associated with the siting and construction of generation and grid assets. Measured against the definition of substantive effect set out in 2.4 - a financial effect equivalent to a decrease of 2.1% or more in annual consolidated revenue, approximately TL 760 million for the reporting year - none of these risks reaches the corporate threshold, individually or in aggregate, in the reporting year or over the assessed horizons. As an electricity generation, distribution and retail supply business, Zorlu Enerji neither produces nor trades forest risk commodities, and all reported volumes are sourced rather than produced. The volumes involved are negligible relative to total procurement expenditure, so neither disruption of supply nor commodity price movement in these categories is capable of producing a financial effect at the corporate threshold. Land use effects associated with our assets are assessed through biodiversity and ecosystem risk assessment and managed through mitigation hierarchy measures and afforestation, and are not expected to generate regulatory, operational or reputational costs at the corporate threshold. These exposures are managed rather than accepted. An anti-deforestation commitment applies across our supply chain, deforestation-free expectations are embedded in supplier requirements, and compliance is monitored through our supplier environmental and social assessment process. This conclusion is reassessed annually, and any risk exceeding the 2.4 threshold will be reported in full.

Water

(3.1.1) Environmental risks identified

Select from:

☑ No

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

☑ Environmental risks exist, but none with the potential to have a substantive effect on our organization

(3.1.3) Please explain

Zorlu Enerji identifies and assesses water-related risks annually through the enterprise risk management process described in 2.2.2, covering both inherent risk, before any controls are applied, and residual risk, across direct operations and the upstream and downstream value chain. Basin-level exposure has been mapped for all operating sites using the WRI Aqueduct Water Risk Atlas and Future Trend Analysis and the WWF Water Risk Filter, under RCP 2.6, 7.0 and 8.5 across the 2030, 2050 and 2080 horizons. Water-related risks have been identified. These include reduced precipitation and drought affecting hydroelectric generation, the operation of sites located in basins classified as water-stressed, and tightening discharge quality requirements applicable to geothermal operations. Measured against the definition of substantive effect set out in 2.4 - a financial effect equivalent to a decrease of 2.1% or more in annual consolidated revenue, approximately TL 760 million for the reporting year - none of these risks reaches the corporate threshold, individually or in aggregate, in the reporting year or over the assessed horizons. Three factors drive this conclusion. First, the overwhelming majority of our reported water withdrawal is non-consumptive hydroelectric pass-through, which is returned to the same water body at the point of abstraction and creates no competing demand and no associated cost exposure. Second, geothermal operations return the majority of extracted fluid to the reservoir through reinjection rather than to surface water bodies, which limits both consumptive use and discharge-related exposure. Third, hydroelectric assets account for a limited share of total generation, so basin-level hydrological variability does not translate into a financial effect at the corporate threshold. Water-related targets covering withdrawal, reinjection and water efficiency are in place and monitored, and water quality parameters are managed under permit conditions at each site. This conclusion is consistent with the materiality assessment published in our TSRS-aligned Sustainability Report, which is subject to limited assurance. It is reassessed annually, and any risk exceeding the 2.4 threshold will be reported in full.
[Fixed row]

(3.1.1) Provide details of the environmental risks identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk1

(3.1.1.3) Risk types and primary environmental risk driver

Market

☑ Changing customer behavior

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ Türkiye

(3.1.1.9) Organization-specific description of risk

Rising adoption of distributed energy resources - rooftop solar, behind-the-meter storage, microgrids and off-grid solutions - within OEDAS's distribution territory (Eskisehir, Kutahya, Afyonkarahisar, Bilecik and Usak) reduces the volume of electricity supplied through the grid and reshapes customer load profiles. The direct commercial consequence falls on Osmangazi Elektrik Perakende Satis A.S. (OEPSAS), our retail supply business. As prosumer penetration increases, a growing share of customer demand is met behind the meter, eroding retail sales volumes, increasing customer churn and intensifying competition for customer acquisition and retention. Because a substantial part of the retail cost base is fixed - customer service, billing, IT platforms and compliance - declining volumes also weaken operating leverage. Load profiles with higher intermittency and lower net consumption complicate forecasting and balancing, increasing imbalance risk and sensitivity to wholesale price movements.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Decreased revenues due to reduced demand for products and services

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Long-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Likely

(3.1.1.14) Magnitude

Select from:

☑ Low

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The primary anticipated effect is a reduction in OEPSAS retail electricity sales revenue, which becomes material in the long-term horizon as distributed generation penetration rises from the 2025 level of 2% to between 9% and 23% by 2040 depending on scenario. Beyond the revenue line, declining billed volumes reduce cash generation and constrain working capital, particularly where timing differences arise between wholesale settlement obligations and retail collections. Margin compression is likely to be greater than volume loss alone would suggest, because fixed retail cost components cannot be reduced in proportion. Sustained revenue pressure may also limit investment capacity for digital customer channels, smart metering integration and new product development, which in turn slows repositioning towards emerging retail value pools in a more decentralised power system. The outcome depends significantly on tariff design. If fixed cost recovery continues to rely on volumetric consumption, margin compression is amplified; tariff rebalancing towards fixed charges or grid contribution fees would reduce the effect.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ Yes

(3.1.1.23) Anticipated financial effect figure in the long-term – minimum (currency)

10235212409.24

(3.1.1.24) Anticipated financial effect figure in the long-term – maximum (currency)

28434065999.15

(3.1.1.25) Explanation of financial effect figure

Figures are cumulative for the long-term horizon (2031-2040) and are stated before mitigation. Driver: distributed energy resource penetration, expressed as a percentage, with a 2025 realised base value of 2.00%. Scenario pathways for 2026-2040 are taken from the same four scenarios used throughout our climate risk assessment. Only increases above the base value are counted, so incremental penetration is the maximum of zero and the scenario value less 2.00%. Calibration: each one percentage point increase in distributed energy penetration is assumed to reduce OEPSAS revenue by 0.4%, giving a calibration factor of 0.004. Annual revenue loss is this rate applied to the OEPSAS revenue baseline for that year, and the long-term figure is the sum of annual losses across 2031-2040. Results are expressed as a share of the consolidated revenue forecast for the same period, which totals TRY 1,090,242,134,898 for 2031-2040. The baseline revenue series is treated as a no-additional-DER counterfactual, so the figures represent incremental loss rather than total revenue decline. Minimum: TRY 10,235,212,409 (Current Policies), equal to 0.94% of forecast consolidated revenue for the period. Maximum: TRY 28,434,065,999 (Net Zero), equal to 2.61%. A Fragmented World gives TRY 21,838,624,308 (2.00%) and Delayed Transition TRY 14,559,082,872 (1.34%). Margin compression, customer churn costs and incremental capital expenditure for prosumer integration are not quantified within this figure.

(3.1.1.26) Primary response to risk

Diversification

☑ Develop new products, services and/or markets

(3.1.1.27) Cost of response to risk

19766000

(3.1.1.28) Explanation of cost calculation

Costs reflect the capital expenditure required to establish aggregation capability, totalling USD 500,000 and converted at 39.532 TRY/USD to give TRY 19,766,000. The components are the aggregation licence fee of TRY 10 million and system infrastructure of TRY 10 million covering billing and registration systems needed to migrate OEPSAS retail customers into the aggregation portfolio. Share capital contributed to the new entity (TRY 50 million) and the letter of guarantee provided to generators and to EPIAS (TRY 200 million) are excluded, as neither is an expense of responding to the risk.

(3.1.1.29) Description of response

Rather than accepting the erosion of retail volumes, Zorlu Enerji has repositioned to capture value from the same transition that drives the risk. A 20-year aggregation licence has been obtained through the establishment of Zorlu Dengeleme Enerji Yonetimi A.S. Aggregation allows small generators, unlicensed solar plants whose feed-in tariff period has ended, and demand-side participants to be managed as a single market participant. This converts distributed generation from a source of lost retail volume into an addressable portfolio: revenue is generated through imbalance management, electricity trading and, once the deferred tender conditions are settled, demand-side participation. The volume projection reaches 1,278 MW and 5,090,000 MWh by 2030. Alongside this, OEPSAS pursues customer retention and

service differentiation, and the group is developing bundled offerings for prosumers so that customers who install their own generation remain within the commercial relationship rather than leaving it. The response is monitored through the enterprise risk management cycle and reported to the Sustainability Committee. No asset disposal is anticipated as a result of this risk. The response contributes to SDG 7.
[Add row]

(3.1.2) Provide the amount and proportion of your financial metrics from the reporting year that are vulnerable to the substantive effects of environmental risks.

Climate change

(3.1.2.1) Financial metric

Select from:
☑ Revenue

(3.1.2.2) Amount of financial metric vulnerable to transition risks for this environmental issue (unit currency as selected in 1.2)

12193093920

(3.1.2.3) % of total financial metric vulnerable to transition risks for this environmental issue

Select from:
☑ 31-40%

(3.1.2.4) Amount of financial metric vulnerable to physical risks for this environmental issue (unit currency as selected in 1.2)

8565633869

(3.1.2.5) % of total financial metric vulnerable to physical risks for this environmental issue

Select from:
☑ 21-30%

(3.1.2.7) Explanation of financial figures

Figures are stated for the reporting year and reflect the revenue lines assessed as vulnerable to the climate-related risks reported in 3.1.1 and to the wider set of climate risks identified in our scenario analysis, regardless of the horizon in which the effect is anticipated. Total consolidated revenue for the reporting year was TRY 36,197,415,541. Transition risks: vulnerability is assigned to the revenue of Osmangazi Elektrik Perakende Satis A.S. (OEPSAS), our retail electricity supply business, which was TRY 12,193,093,920, or 33.7% of consolidated revenue. This is the revenue line exposed to the substantive transition risk reported in 3.1.1, namely the erosion of retail sales volumes as customers adopt distributed energy resources. The whole retail book is treated as vulnerable rather than only the share modelled as lost, because prosumer migration can in principle affect any customer in the portfolio and because the definition of vulnerability covers susceptibility to harm rather than expected loss. Revenue is not assigned to our other transition risks, since their primary financial channels are operating expenditure (Turkish ETS carbon cost on geothermal emissions), capital expenditure (SF6 restriction) and financing expenses (sustainability-linked bond coupon adjustment) rather than revenue. Physical risks: vulnerability is assigned to the generation revenue of Zorlu Yenilenebilir Enerji A.S. and its subsidiaries, which was TRY 8,565,633,869, or 23.7% of consolidated revenue. This is the revenue exposed to acute precipitation-driven disruption of generation availability, principally at hydroelectric assets through intake constraints and forced outages, and to temperature effects on plant efficiency. Distribution network exposure to wildfire is excluded from this figure because its primary financial channel is operating expenditure and service quality penalties rather than revenue. The two amounts are reported separately and are not additive, as they relate to different business lines and different risk drivers.
[Add row]

(3.3) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for water-related regulatory violations?

(3.3.1) Water-related regulatory violations

Select from:
☑ No

(3.3.3) Comment

We recorded no water-related regulatory violation, fine, enforcement order or other penalty in the reporting year. Compliance with abstraction licences, discharge consents and environmental flow conditions is monitored continuously at each site within our ISO 14001 certified environmental management system, and compliance with the environmental flow conditions set by the State Hydraulic Works is reported to the regulator for each of our seven hydroelectric plants. Discharge quality is verified annually by an accredited third-party laboratory at the facilities where we operate our own treatment. This position is disclosed on the same basis in our Integrated Annual Report, which reports zero environmental fines, zero incidents of non-compliance with water quality or quantity permits, and zero non-monetary penalties or enforcement orders for both 2024 and 2025.
[Fixed row]

(3.5) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?

Select from:

☑ No, but we anticipate being regulated in the next three years

(3.5.4) What is your strategy for complying with the systems you are regulated by or anticipate being regulated by?

Zorlu Enerji operates in Türkiye, where carbon pricing has moved from prospect to obligation during and immediately after the reporting year. Climate Law No. 7552 was published in the Official Gazette on 9 July 2025 and established the national Emissions Trading System, and the Turkish ETS Regulation followed on 27 August 2026. Covered installations are required to obtain a greenhouse gas emission permit within three years of the Climate Law entering into force, together with monitoring, reporting and verification obligations. As the system had not generated actual compliance costs during 2025, no realised regulatory carbon cost was incurred in the reporting year. We also monitor the European Union Carbon Border Adjustment Mechanism, which affects the competitiveness of activity linked to the European market. Our compliance strategy rests on absolute emissions reduction rather than on the purchase of allowances or credits. This is a deliberate choice: allowance prices are the variable we control least, and a strategy built on buying compliance would expose us to exactly the price trajectory our scenario analysis projects, rising from EUR 11.6/tCO2e in 2027 to EUR 254.9/tCO2e by 2040 under our Net Zero pathway, with the four modelled scenarios spanning EUR 15 to EUR 254.9 per tCO2e in 2040 The strategy has four components. First, portfolio composition. We have exited thermal electricity generation, and our planned generation investment to 2030 is directed to renewable capacity, predominantly wind and solar. This removes covered emissions from the portfolio rather than offsetting them. Second, science-based targets. Our SBTi-validated targets require a 73.71% reduction in Scope 1 emission intensity per MWh by 2030 against a 2021 base year and net zero by 2040. Our 2025 performance was on or ahead of the interim milestones for Scope 1 intensity, absolute Scope 2 and combined Scope 1 and fuel- and energy-related Scope 3 intensity. Delivering these targets is what keeps our future allowance requirement low. Third, an internal carbon price. We apply a shadow price in the range of USD 70 to 110 per tonne of CO2e, derived from four Bloomberg NEF carbon pricing scenarios and benchmarked against European Union Emissions Trading System allowance prices, specifically to align internal investment decisions with the price signal expected under a functioning Turkish ETS. The price is applied to capital expenditure appraisal, procurement, operations, research and development, and risk management, and its use is mandatory across those processes. Further detail is provided in question 5.10.1. Fourth, governance and readiness. Regulatory developments are tracked by the Sustainability Directorate and reviewed quarterly by the Sustainability Committee, which comprises two Board members and the Chief Executive Officer. We are preparing the monitoring, reporting and verification systems required for the emission permit process, building on the greenhouse gas inventory we already have independently assured under ISAE 3000 and ISAE 3410. We engage on ETS design through sector associations.

(3.6) Have you identified any environmental opportunities which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

Climate change

(3.6.1) Environmental opportunities identified

Select from:

☑ No

(3.6.2) Primary reason why your organization does not consider itself to have environmental opportunities

Select from:

☑ Opportunities exist, but none anticipated to have a substantive effect on organization

(3.6.3) Please explain

Zorlu Enerji identifies and assesses climate-related opportunities annually through the same enterprise risk and opportunity management process described in 2.2.2, using the four scenarios and four time horizons applied to risks: the reporting year (2025), short term (2026), medium term (2027-2030) and long term (2031-2040). Five climate-related opportunities have been identified and quantified. Growth in decentralised energy increases demand for electric vehicle charging services; corporate decarbonisation commitments raise demand and prices for I-REC and YEK-G certificates; recycling and circular procurement of network equipment reduces material costs; electrification of the corporate and field-service fleet reduces fuel and maintenance expenditure; and access to sustainable finance lowers funding costs through a greenium on sustainability-linked instruments. Measured against the definition of substantive effect in 2.4 - a financial effect equivalent to 2.1% or more of revenue - none of these reaches the corporate threshold in any scenario or horizon. Under the most favourable pathway, the Net Zero scenario, the largest single opportunity is the growth in electric vehicle charging demand at TRY 3.12 billion cumulatively over 2031-2040, equal to 0.29% of forecast consolidated revenue for that period. Even if all five were realised simultaneously under that pathway, the combined effect would be TRY 11.41 billion, or 1.05%, which remains below the threshold. These opportunities are nonetheless actively pursued rather than set aside. Electric vehicle charging infrastructure is operated through the ZES and Electrip networks, renewable certificates are issued and traded from our generation portfolio, circular procurement practices are applied in the distribution business, fleet electrification is under way, and our sustainability-linked bond structure is already delivering financing benefits as targets are met. Each is monitored through the enterprise risk management cycle and reported to the Sustainability Committee. The assessment is repeated annually, and any opportunity exceeding the 2.4 threshold in a future cycle will be reported in full.

Forests

(3.6.1) Environmental opportunities identified

Select from:

☑ No

(3.6.2) Primary reason why your organization does not consider itself to have environmental opportunities

Select from:

☑ Opportunities exist, but none anticipated to have a substantive effect on organization

(3.6.3) Please explain

Zorlu Enerji assesses forest-related opportunities annually through the enterprise risk and opportunity management process described in 2.2.2, covering direct operations and the upstream value chain. Forest-related opportunities have been identified. They arise principally through afforestation and ecosystem restoration associated with our generation and grid assets, through circular procurement of timber-based materials in the distribution business which reduces demand for virgin wood, and through reputational and stakeholder benefits linked to our anti-deforestation commitment and land management practices. Measured against the definition of substantive effect in 2.4 - a financial effect equivalent to 2.1% or more of revenue - none of these reaches the corporate threshold. As an electricity generation, distribution and retail supply business, Zorlu Enerji neither produces nor trades forest risk commodities, and the volumes of timber-based materials we source are negligible relative to total procurement expenditure. Cost savings or revenue gains available from changing how these volumes are sourced are correspondingly small at corporate level. Land restoration and afforestation activity is undertaken for ecological and licensing reasons rather than as a source of financial return, and is not modelled as generating revenue. These opportunities are pursued despite being below the threshold. Afforestation and habitat restoration are carried out at operating sites, circular procurement is applied to network materials, and supplier expectations include deforestation-free requirements. The assessment is repeated annually, and any opportunity exceeding the 2.4 threshold in a future cycle will be reported in full.

Water

(3.6.1) Environmental opportunities identified

Select from:

☑ No

(3.6.2) Primary reason why your organization does not consider itself to have environmental opportunities

Select from:

☑ Opportunities exist, but none anticipated to have a substantive effect on organization

(3.6.3) Please explain

Zorlu Enerji assesses water-related opportunities annually through the enterprise risk and opportunity management process described in 2.2.2, covering direct operations and the value chain, and informed by basin-level mapping using the WRI Aqueduct Water Risk Atlas and the WWF Water Risk Filter. Water-related opportunities have been identified. They arise through geothermal reinjection, which returns the majority of extracted fluid to the reservoir and supports both resource sustainability and reservoir pressure; through water efficiency and reuse measures at operating sites that reduce withdrawal and associated costs; through improved reliability of hydroelectric generation where basin management and forecasting are strengthened; and through stakeholder and permitting benefits associated with responsible water management in shared basins. Measured against the definition of substantive effect in 2.4 - a financial effect equivalent to 2.1% or more of revenue - none of these reaches the corporate threshold. The overwhelming majority of our reported withdrawal is non-consumptive hydroelectric pass-through, which carries no significant cost and therefore offers no significant saving. Efficiency gains at operational sites are real but small relative to group revenue, and reinjection is undertaken primarily to sustain the geothermal resource and meet permit conditions rather than as a source of financial return. These opportunities are pursued

despite being below the threshold. Water-related targets covering withdrawal, reinjection and efficiency are in place and monitored, and water management performance is reported annually with limited assurance. The assessment is repeated annually, and any opportunity exceeding the 2.4 threshold in a future cycle will be reported in full.
[Fixed row]

C4. Governance

(4.1) Does your organization have a board of directors or an equivalent governing body?

(4.1.1) Board of directors or equivalent governing body

Select from:

☑ Yes

(4.1.2) Frequency with which the board or equivalent meets

Select from:

☑ More frequently than quarterly

(4.1.3) Types of directors your board or equivalent is comprised of

Select all that apply

☑ Executive directors or equivalent

☑ Non-executive directors or equivalent

☑ Independent non-executive directors or equivalent

(4.1.4) Board diversity and inclusion policy

Select from:

☑ Yes, and it is publicly available

(4.1.5) Briefly describe what the policy covers

Zorlu Enerji emphasizes the critical importance of inclusion, equality, and diversity as core drivers of innovation, development, and long-term business sustainability. These values are embedded within the company's broader Sustainability Strategy and are reflected in every aspect of its operations, from board-level governance to the day-to-day running of the business. The Board Diversity and Inclusion Policy ensures that diversity on the board is prioritized by establishing guidelines for the fair and unbiased selection of candidates based on gender, ethnicity, race, and other defining characteristics. This policy aims to promote a dynamic and representative board that fosters innovation through diverse perspectives. A significant target within the policy is to increase the representation of women in leadership roles, with a

goal of reaching 30% female participation in decision-making positions by 2030. The policy also advocates for equal opportunities for people from underrepresented groups, ensuring that board members come from a wide variety of backgrounds, beliefs, and expertise. Zorlu Enerji regularly tracks the progress of these initiatives and reports on them publicly to maintain transparency and accountability. This approach not only aligns with global sustainability standards but also strengthens Zorlu Enerji's competitive advantage by fostering an inclusive and forward-thinking corporate culture.

(4.1.6) Attach the policy (optional)

Board Diversity Policy.pdf
[Fixed row]

(4.1.1) Is there board-level oversight of environmental issues within your organization?

	Board-level oversight of this environmental issue
Climate change	*Select from:* ☑ Yes
Forests	*Select from:* ☑ Yes
Water	*Select from:* ☑ Yes
Biodiversity	*Select from:* ☑ Yes

[Fixed row]

(4.1.2) Identify the positions (do not include any names) of the individuals or committees on the board with accountability for environmental issues and provide details of the board's oversight of environmental issues.

Climate change

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

☑ Chief Executive Officer (CEO)

☑ Board-level committee

☑ Other, please specify :Sustainability Committee

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

☑ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

☑ Other policy applicable to the board, please specify :Zorlu Enerji Environment Policy

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

☑ Scheduled agenda item in every board meeting (standing agenda item)

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

☑ Reviewing and guiding annual budgets

☑ Overseeing and guiding scenario analysis

☑ Overseeing the setting of corporate targets

☑ Monitoring progress towards corporate targets

☑ Overseeing and guiding value chain engagement

☑ Overseeing reporting, audit, and verification processes

☑ Monitoring the implementation of a climate transition plan

☑ Overseeing and guiding the development of a business strategy

☑ Approving corporate policies and/or commitments

☑ Overseeing and guiding public policy engagement

☑ Approving and/or overseeing employee incentives

☑ Overseeing and guiding major capital expenditures

☑ Monitoring the implementation of the business strategy

☑ Overseeing and guiding acquisitions, mergers, and divestitures
☑ Monitoring supplier compliance with organizational requirements
☑ Monitoring compliance with corporate policies and/or commitments
☑ Overseeing and guiding the development of a climate transition plan
☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

(4.1.2.7) Please explain

The Sustainability Board, reporting to the Board of Directors, oversees Zorlu Enerji's climate-related performance, risks, opportunities, and ESG developments. It integrates these factors into the company's strategy and sets climate-related targets. The board, chaired by an independent member, meets at least annually, with the CEO, CFO, and sector president as key members. Their involvement ensures that climate issues are embedded in Zorlu Enerji's financial decisions, corporate strategy, and long-term planning, including emissions reduction targets and alignment with the IEA NZE 2050 scenario. The CEO and CFO play critical roles, ensuring climate goals are integrated into financial planning and corporate investments, including the development of Zorlu Enerji's climate transition plan. The CFO ensures budget allocations, capital expenditures, and M&A activities consider climate risks and opportunities. The Sustainability Board tracks progress towards corporate commitments, guiding the assessment of dependencies, impacts, and risks associated with climate change. Decisions made by the Sustainability Board are implemented through the Sustainability Directorate, which works with senior executives to apply these across the company. The CEO and CFO ensure alignment between climate goals and business operations, prioritizing investments in renewable energy, carbon capture technologies, and compliance with global climate initiatives like the Paris Agreement and SBTi. This helps Zorlu Enerji meet its decarbonization targets, adapt to regulatory shifts, and drive long-term value creation. The board also oversees scenario analysis, using models like IEA NZE 2050 to anticipate financial and operational impacts. These analyses inform strategic decisions such as investments in decarbonization, renewable energy assets, and mitigation of transition risks. By regularly reviewing climate scenarios, the board ensures Zorlu Enerji remains resilient in the face of evolving climate risks and opportunities. The CFO plays a key role in ensuring climate-related financial risks are incorporated into the company's broader financial strategy, while the CEO ensures that operational goals align with long-term sustainability objectives. The board monitors employee incentives tied to climate goals, ensuring accountability and fostering a culture of environmental responsibility. This governance approach positions Zorlu Enerji to lead the energy transition while building resilience and ensuring sustained business growth.

Forests

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply
☑ Chief Executive Officer (CEO)
☑ Board-level committee
☑ Other, please specify :Sustainability Committee

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

☑ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

☑ Other policy applicable to the board, please specify :Zorlu Enerji Deforestation Combat Policy

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

☑ Scheduled agenda item in every board meeting (standing agenda item)

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

☑ Reviewing and guiding annual budgets
☑ Overseeing and guiding scenario analysis
☑ Overseeing the setting of corporate targets
☑ Monitoring progress towards corporate targets
☑ Overseeing and guiding value chain engagement
☑ Monitoring the implementation of the business strategy
☑ Overseeing reporting, audit, and verification processes
☑ Monitoring the implementation of a climate transition plan
☑ Overseeing and guiding the development of a business strategy
☑ Overseeing and guiding acquisitions, mergers, and divestitures
☑ Monitoring supplier compliance with organizational requirements
☑ Monitoring compliance with corporate policies and/or commitments
☑ Overseeing and guiding the development of a climate transition plan
☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities
☑ Approving corporate policies and/or commitments
☑ Overseeing and guiding public policy engagement
☑ Reviewing and guiding innovation/R&D priorities
☑ Approving and/or overseeing employee incentives
☑ Overseeing and guiding major capital expenditures

(4.1.2.7) Please explain

Board-level accountability for forests sits with the Sustainability Committee (chaired by an independent board member; two board members and the CEO), under the Sustainability Committee Terms of Reference. The Committee met four times in 2025 and reports to the Board of Directors. Briefings are provided by the Sustainability, Quality and OHS-E Directorate, supported by the Regenerate working group, which covers land use, biodiversity and ecosystem protection. Two concrete decisions in 2025 demonstrate this oversight. First, the Committee approved the company's Anti-Deforestation Policy, establishing a board-endorsed commitment against deforestation across operations and the supply chain. Second, the Committee approved a donation of 90,000 saplings to the Ministry of National Education, contributing to afforestation and to the company's broader restoration commitments. Through these mechanisms the Committee approves corporate policies and commitments and monitors compliance with them, oversees the setting of and progress towards restoration targets, guides the assessment process for forests-related dependencies, impacts, risks and opportunities, and monitors supplier alignment with organizational requirements — relevant given that forests exposure arises largely from land use in project development and from the embedded land-use footprint of the upstream supply chain. Board-level oversight covers direct operations and the upstream value chain.

Water

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

☑ Chief Executive Officer (CEO)

☑ Board-level committee

☑ Other, please specify :Sustainability Committee

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

☑ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

☑ Other policy applicable to the board, please specify :Zorlu Enerji Environmental Policy

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

☑ Scheduled agenda item in every board meeting (standing agenda item)

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

☑ Reviewing and guiding annual budgets
☑ Overseeing and guiding scenario analysis
☑ Overseeing the setting of corporate targets
☑ Monitoring progress towards corporate targets
☑ Overseeing and guiding value chain engagement
☑ Monitoring the implementation of the business strategy
☑ Overseeing reporting, audit, and verification processes
☑ Monitoring the implementation of a climate transition plan
☑ Overseeing and guiding the development of a business strategy
☑ Overseeing and guiding acquisitions, mergers, and divestitures
☑ Monitoring supplier compliance with organizational requirements
☑ Monitoring compliance with corporate policies and/or commitments
☑ Overseeing and guiding the development of a climate transition plan
☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities
☑ Approving corporate policies and/or commitments
☑ Overseeing and guiding public policy engagement
☑ Reviewing and guiding innovation/R&D priorities
☑ Approving and/or overseeing employee incentives
☑ Overseeing and guiding major capital expenditures

(4.1.2.7) Please explain

The Sustainability Board, reporting to the Board of Directors, oversees and monitors the company's performance in the areas of ESG, particularly focusing on water-related risks and opportunities. This includes the integration of water management into Zorlu Enerji's strategy, assessing potential risks related to water scarcity, quality, and regulatory changes that may impact geothermal and other water-dependent operations. The Sustainability Board sets clear water-related targets and integrates them into the overall environmental strategy of the company, ensuring alignment with global standards. Chaired by an independent board member, the Sustainability Board convenes at least once a year to evaluate progress on water-related initiatives and to address any emerging issues. The CEO and CFO are also engaged, ensuring that resource allocation and financial planning are aligned with the company's water management objectives. The Board further delegates responsibility to the Sustainability Directorate, which coordinates implementation efforts across departments, ensuring that operational divisions have the resources and guidance to manage water usage efficiently, including the prioritization of water reuse systems, closed-loop processes, and innovation in water conservation technologies. Decisions taken by the Board are executed under the supervision of senior management, with clear reporting lines to ensure that water-related goals are met across the company's operations, from geothermal facilities to hydropower plants. Continuous tracking of performance against targets ensures that Zorlu Enerji remains resilient to water-related environmental risks while contributing to the sustainable use of water resources.

Biodiversity

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

☑ Chief Executive Officer (CEO)

☑ Board-level committee

☑ Other, please specify :Sustainability Committee

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

☑ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

☑ Other policy applicable to the board, please specify :Zorlu Enerji Biodiversity Protection Policy

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

☑ Scheduled agenda item in every board meeting (standing agenda item)

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

☑ Reviewing and guiding annual budgets

☑ Overseeing and guiding scenario analysis

☑ Overseeing the setting of corporate targets

☑ Monitoring progress towards corporate targets

☑ Overseeing and guiding value chain engagement

☑ Monitoring the implementation of the business strategy

☑ Overseeing reporting, audit, and verification processes

☑ Monitoring the implementation of a climate transition plan

☑ Approving corporate policies and/or commitments

☑ Overseeing and guiding public policy engagement

☑ Reviewing and guiding innovation/R&D priorities

☑ Approving and/or overseeing employee incentives

☑ Overseeing and guiding major capital expenditures

☑ Overseeing and guiding the development of a business strategy
☑ Overseeing and guiding acquisitions, mergers, and divestitures
☑ Monitoring supplier compliance with organizational requirements
☑ Monitoring compliance with corporate policies and/or commitments
☑ Overseeing and guiding the development of a climate transition plan
☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

(4.1.2.7) Please explain

The Sustainability Board, reporting to the Board of Directors, monitors the company's performance, risks, opportunities, resource needs, and recent developments in the areas of ESG, climate, water, and biodiversity. It integrates these matters into the company's strategy and sets targets while tracking progress. Chaired by an independent board member, the Sustainability Board meets at least once a year, with the sector president serving as the other member. Decisions made by the Board are implemented across the company under the leadership of the Sustainability Directorate and through the relevant organizations reporting to senior executives.
[Fixed row]

(4.2) Does your organization’s board have competency on environmental issues?

Climate change

(4.2.1) Board-level competency on this environmental issue

Select from:
☑ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply
☑ Consulting regularly with an internal, permanent, subject-expert working group
☑ Engaging regularly with external stakeholders and experts on environmental issues
☑ Integrating knowledge of environmental issues into board nominating process
☑ Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)
☑ Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Experience

☑ Executive-level experience in a role focused on environmental issues

☑ Management-level experience in a role focused on environmental issues

☑ Experience in an organization that is exposed to environmental-scrutiny and is going through a sustainability transition

☑ Active member of an environmental committee or organization

Forests

(4.2.1) Board-level competency on this environmental issue

Select from:

☑ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

☑ Consulting regularly with an internal, permanent, subject-expert working group

☑ Engaging regularly with external stakeholders and experts on environmental issues

☑ Integrating knowledge of environmental issues into board nominating process

☑ Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)

☑ Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Experience

☑ Executive-level experience in a role focused on environmental issues

☑ Management-level experience in a role focused on environmental issues

☑ Experience in an organization that is exposed to environmental-scrutiny and is going through a sustainability transition

☑ Active member of an environmental committee or organization

Water

(4.2.1) Board-level competency on this environmental issue

Select from:

☑ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

☑ Consulting regularly with an internal, permanent, subject-expert working group

☑ Engaging regularly with external stakeholders and experts on environmental issues

☑ Integrating knowledge of environmental issues into board nominating process

☑ Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)

☑ Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Experience

☑ Executive-level experience in a role focused on environmental issues

☑ Management-level experience in a role focused on environmental issues

☑ Experience in an organization that is exposed to environmental-scrutiny and is going through a sustainability transition

☑ Active member of an environmental committee or organization

[Fixed row]

(4.3) Is there management-level responsibility for environmental issues within your organization?

	Management-level responsibility for this environmental issue
Climate change	*Select from:* ☑ Yes
Forests	*Select from:* ☑ Yes
Water	*Select from:* ☑ Yes
Biodiversity	*Select from:* ☑ Yes

[Fixed row]

(4.3.1) Provide the highest senior management-level positions or committees with responsibility for environmental issues (do not include the names of individuals).

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Executive Officer (CEO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Assessing future trends in environmental dependencies, impacts, risks, and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

Engagement
☑ Managing public policy engagement related to environmental issues
☑ Managing value chain engagement related to environmental issues

Policies, commitments, and targets
☑ Monitoring compliance with corporate environmental policies and/or commitments
☑ Measuring progress towards environmental corporate targets
☑ Measuring progress towards environmental science-based targets
☑ Setting corporate environmental policies and/or commitments
☑ Setting corporate environmental targets

Strategy and financial planning
☑ Conducting environmental scenario analysis
☑ Developing a business strategy which considers environmental issues
☑ Developing a climate transition plan
☑ Implementing a climate transition plan
☑ Implementing the business strategy related to environmental issues

Other
☑ Providing employee incentives related to environmental performance

(4.3.1.4) Reporting line

Select from:
☑ Reports to the board directly

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:
☑ Quarterly

(4.3.1.6) Please explain

The CEO holds the highest management-level responsibility for climate change and is a member of the Sustainability Committee, which sits under the Board of Directors, is chaired by an independent board member and comprises two board members and the CEO. Final approvals are granted at CEO level. The CEO is informed quarterly through the Committee cycle. Briefings are prepared by the Sustainability, Quality and OHS-E Directorate, drawing on analysis from the Regenerate, Embrace and Transform working groups, which report regularly to the Committee. Controls are integrated with other internal functions: climate risks are managed within the centralized enterprise risk management system (COSO / ISO 31000), performance data is recorded in the QDMS platform, and climate considerations are embedded in budgeting and capital expenditure through the finance function.

Forests

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Executive Officer (CEO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Assessing future trends in environmental dependencies, impacts, risks, and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

☑ Managing public policy engagement related to environmental issues

☑ Managing value chain engagement related to environmental issues

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

☑ Measuring progress towards environmental corporate targets

☑ Measuring progress towards environmental science-based targets

☑ Setting corporate environmental policies and/or commitments

☑ Setting corporate environmental targets

Strategy and financial planning
☑ Developing a climate transition plan
☑ Implementing a climate transition plan
☑ Conducting environmental scenario analysis
☑ Managing annual budgets related to environmental issues
☑ Implementing the business strategy related to environmental issues
☑ Developing a business strategy which considers environmental issues
☑ Managing environmental reporting, audit, and verification processes
☑ Managing acquisitions, mergers, and divestitures related to environmental issues
☑ Managing major capital and/or operational expenditures relating to environmental issues
☑ Managing priorities related to innovation/low-environmental impact products or services (including R&D)

Other
☑ Providing employee incentives related to environmental performance

(4.3.1.4) Reporting line

Select from:
☑ Reports to the board directly

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:
☑ Quarterly

(4.3.1.6) Please explain

The CEO holds the highest management-level responsibility for forests and is a member of the Sustainability Committee, which sits under the Board of Directors, is chaired by an independent board member and comprises two board members and the CEO. Final approvals are granted at CEO level. The CEO is informed quarterly through the Committee cycle. Briefings are prepared by the Sustainability, Quality and OHS-E Directorate, supported by the Regenerate working group, which covers land use, biodiversity and ecosystem protection. Controls are integrated with the ISO 14001 environmental management system, the enterprise risk management

framework and the procurement function, the latter being relevant as forests exposure arises largely from land use in project development and from the embedded land-use footprint of the upstream supply chain.

Water

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Executive Officer (CEO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Assessing future trends in environmental dependencies, impacts, risks, and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

☑ Managing public policy engagement related to environmental issues

☑ Managing value chain engagement related to environmental issues

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

☑ Measuring progress towards environmental corporate targets

☑ Measuring progress towards environmental science-based targets

☑ Setting corporate environmental policies and/or commitments

☑ Setting corporate environmental targets

Strategy and financial planning

☑ Developing a climate transition plan

☑ Implementing a climate transition plan

☑ Conducting environmental scenario analysis

☑ Managing annual budgets related to environmental issues
☑ Implementing the business strategy related to environmental issues
☑ Developing a business strategy which considers environmental issues
☑ Managing environmental reporting, audit, and verification processes
☑ Managing acquisitions, mergers, and divestitures related to environmental issues
☑ Managing major capital and/or operational expenditures relating to environmental issues
☑ Managing priorities related to innovation/low-environmental impact products or services (including R&D)

Other
☑ Providing employee incentives related to environmental performance

(4.3.1.4) Reporting line

Select from:
☑ Reports to the board directly

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:
☑ Quarterly

(4.3.1.6) Please explain

The CEO holds the highest management-level responsibility for water and is a member of the Sustainability Committee, which sits under the Board of Directors, is chaired by an independent board member and comprises two board members and the CEO. Final approvals are granted at CEO level. The CEO is informed quarterly through the Committee cycle. Briefings are prepared by the Sustainability, Quality and OHS-E Directorate, with technical input from the Regenerate working group, whose remit covers water and marine resource management. Site-level withdrawal, discharge and effluent quality data is collected by operational teams and recorded in QDMS. Controls are integrated with the enterprise risk management system, the ISO 14001 environmental management system and ISO 14046 water footprint assessment, while water-related capital and operational expenditure is reviewed through the budget process with the finance function.

Biodiversity

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Executive Officer (CEO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Assessing future trends in environmental dependencies, impacts, risks, and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

☑ Managing public policy engagement related to environmental issues

☑ Managing supplier compliance with environmental requirements

☑ Managing value chain engagement related to environmental issues

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

☑ Measuring progress towards environmental corporate targets

☑ Measuring progress towards environmental science-based targets

☑ Setting corporate environmental policies and/or commitments

☑ Setting corporate environmental targets

Strategy and financial planning

☑ Developing a climate transition plan

☑ Implementing a climate transition plan

☑ Conducting environmental scenario analysis

☑ Managing annual budgets related to environmental issues

☑ Implementing the business strategy related to environmental issues

☑ Developing a business strategy which considers environmental issues

☑ Managing environmental reporting, audit, and verification processes

☑ Managing acquisitions, mergers, and divestitures related to environmental issues

☑ Managing major capital and/or operational expenditures relating to environmental issues
☑ Managing priorities related to innovation/low-environmental impact products or services (including R&D)

Other
☑ Providing employee incentives related to environmental performance

(4.3.1.4) Reporting line

Select from:
☑ Reports to the board directly

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:
☑ Quarterly

(4.3.1.6) Please explain

The CEO holds the highest management-level responsibility for biodiversity and is a member of the Sustainability Committee, which sits under the Board of Directors, is chaired by an independent board member and comprises two board members and the CEO. Final approvals are granted at CEO level. The CEO is informed quarterly through the Committee cycle. Briefings are prepared by the Sustainability, Quality and OHS-E Directorate, with analysis from the Regenerate working group, whose remit covers biodiversity and ecosystem protection. Site-level assessment results are recorded in the Biodiversity and Ecosystem Management System on QDMS. Controls are integrated with the ISO 14001 environmental management system, the enterprise risk management framework and the investment approval process, so that biodiversity screening informs site selection and project design.
[Add row]

(4.5) Do you provide monetary incentives for the management of environmental issues, including the attainment of targets?

Climate change

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☑ Yes

(4.5.2) % of total C-suite and board-level monetary incentives linked to the management of this environmental issue

50

(4.5.3) Please explain

Senior executives, including the CEO, participate in a variable short-term incentive plan in addition to fixed salary, in which performance is assessed through a holistic framework combining financial and ESG indicators. Financial targets (EBITDA and debt ratios, interest expenses, investment ratios) carry a 10% weighting, while ESG targets carry 90%. Within the ESG component, functional targets tied directly to Scope 1, Scope 2 and Scope 3 carbon emissions performance carry a 50% weighting of the total incentive, strategic targets based on ESG index scores carry 20%, and organizational targets relating to employee retention and engagement carry 20%. The incentive system is implemented in an integrated manner with the Short-Term and Long-Term Incentive Plans, and employee incentives linked to climate performance are monitored by the Board of Directors through the Sustainability Committee. The 50% figure reported reflects the emissions-linked functional target component.

Forests

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☑ Yes

(4.5.2) % of total C-suite and board-level monetary incentives linked to the management of this environmental issue

20

(4.5.3) Please explain

20% of the total incentive is linked to strategic targets based on ESG index scores (LSEG and S&P), whose methodologies incorporate land use, deforestation and biodiversity performance indicators. Performance in this area therefore forms part of the assessed outcome.

Water

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☑ Yes

(4.5.2) % of total C-suite and board-level monetary incentives linked to the management of this environmental issue

20

(4.5.3) Please explain

20% of the total incentive is linked to strategic targets based on ESG index scores (LSEG and S&P), whose methodologies incorporate water management performance indicators. Performance in this area therefore forms part of the assessed outcome.
[Fixed row]

(4.5.1) Provide further details on the monetary incentives provided for the management of environmental issues (do not include the names of individuals).

Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☑ Chief Executive Officer (CEO)

(4.5.1.2) Incentives

Select all that apply

☑ Bonus - % of salary

(4.5.1.3) Performance metrics

Targets

☑ Progress towards environmental targets

☑ Achievement of environmental targets

☑ Organization performance against an environmental sustainability index
☑ Reduction in absolute emissions in line with net-zero target

Strategy and financial planning
☑ Board approval of climate transition plan
☑ Achievement of climate transition plan

Emission reduction
☑ Reduction in emissions intensity
☑ Reduction in absolute emissions
☑ Other emission reduction-related metrics, please specify :Reduction in scope 3 absolute and intensity emissions

Resource use and efficiency
☑ Improvements in emissions data, reporting, and third-party verification

(4.5.1.4) Incentive plan the incentives are linked to

Select from:
☑ Both Short-Term and Long-Term Incentive Plan, or equivalent

(4.5.1.5) Further details of incentives

Senior executives, including the CEO, receive performance-based bonuses in addition to fixed salary, structured as a percentage of salary together with a fixed component. Performance is assessed annually, with results also carried into the Long-Term Incentive Plan. Financial targets carry a 10% weighting and ESG targets 90%. Within the ESG component, functional targets tied to Scope 1, Scope 2 and Scope 3 carbon emissions performance carry a 50% weighting of the total incentive, strategic targets based on ESG index scores (LSEG and S&P) carry 20%, and organizational targets carry 20%. Performance is measured against the emissions reduction trajectory of the Company's SBTi-validated targets across all Turkish and international operations.

(4.5.1.6) How the position’s incentives contribute to the achievement of your environmental commitments and/or climate transition plan

The emissions-linked component of the incentive is measured directly against the KPIs of the Company's transition plan: Scope 1 emissions intensity from electricity generation, absolute Scope 2 emissions, and Scope 1 and Scope 3 intensity from fuel- and energy-related activities. These are the same metrics against which SBTi-validated 2030 interim targets and the 2040 Net Zero target are tracked. In the reporting year, incentive-linked accountability contributed to a reduction in market-

based Scope 2 emissions from 252,576 tCO_2e to 159,348 tCO_2e and a reduction in Scope 1 and Scope 3 fuel- and energy-related intensity from 0.45 to 0.26 tCO_2e/MWh. Executive accountability for these outcomes supports the prioritisation of renewable capacity investment, energy efficiency projects and the exit from thermal generation set out in the transition plan.

Forests

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☑ Chief Executive Officer (CEO)

(4.5.1.2) Incentives

Select all that apply

☑ Bonus - % of salary

(4.5.1.3) Performance metrics

Targets

☑ Progress towards environmental targets

☑ Achievement of environmental targets

☑ Organization performance against an environmental sustainability index

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

☑ Both Short-Term and Long-Term Incentive Plan, or equivalent

(4.5.1.5) Further details of incentives

Senior executives, including the CEO, receive performance-based bonuses in addition to fixed salary, structured as a percentage of salary together with a fixed component, and implemented in an integrated manner with both the Short-Term and Long-Term Incentive Plans. Performance is assessed annually. Financial targets carry a 10% weighting and ESG targets 90%. No incentive component is tied exclusively to forests-related outcomes; however, strategic targets based on ESG index

scores (LSEG and S&P) carry a 20% weighting of the total incentive, and the methodologies of these indices incorporate land use, deforestation and biodiversity performance indicators. Forests-related performance is therefore assessed as part of this component. As a renewable energy company, our forests exposure arises from land use in the siting and operation of generation and grid assets in Türkiye and from the embedded land-use footprint of the upstream supply chain, rather than from the production or trading of forest-risk commodities.

(4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

The ESG index component of the incentive links executive remuneration to the Company's Anti-Deforestation Policy, approved by the Sustainability Committee during the reporting year, and to the Biodiversity Conservation Policy. Executive accountability for these outcomes supports the application of land-use and habitat screening at project siting stage using IBAT and the WWF Biodiversity Risk Filter, the implementation of site-specific Biodiversity Action Plans, and the extension of ESG alignment requirements to suppliers, with all critical and strategic suppliers to be aligned by 2030 and all suppliers by 2035. It also supports the Company's restoration commitments, including the donation of 90,000 saplings to the Ministry of National Education during the reporting year and the target of 1.2 million saplings planted by 2035 in support of the commitment to become a Net Positive Impact company.

Water

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☑ Chief Executive Officer (CEO)

(4.5.1.2) Incentives

Select all that apply

☑ Bonus - % of salary

(4.5.1.3) Performance metrics

Targets

☑ Progress towards environmental targets

☑ Achievement of environmental targets

☑ Organization performance against an environmental sustainability index

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

☑ Both Short-Term and Long-Term Incentive Plan, or equivalent

(4.5.1.5) Further details of incentives

Senior executives, including the CEO, receive performance-based bonuses in addition to fixed salary, structured as a percentage of salary together with a fixed component, and implemented in an integrated manner with both the Short-Term and Long-Term Incentive Plans. Performance is assessed annually. Financial targets carry a 10% weighting and ESG targets 90%. No incentive component is tied exclusively to water-related outcomes; however, strategic targets based on ESG index scores (LSEG and S&P) carry a 20% weighting of the total incentive, and the methodologies of these indices incorporate water management performance indicators, including water withdrawal and consumption, water intensity and water risk exposure in water-stressed basins. Water performance is therefore assessed as part of this component across all Turkish operations, with particular relevance to our hydroelectric and geothermal generation assets.

(4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

The ESG index component of the incentive links executive remuneration to the Company's water-related commitment to reduce the volume of water used per unit of energy generated annually to 2030, which is tracked and reported as a corporate sustainability target. Accountability at executive level supports the prioritisation of water efficiency measures across the generation portfolio, including reinjection of spent geothermal fluid to maintain reservoir balance, closed-loop systems at Alaşehir GPP, reverse osmosis capacity at the Kızıldere plants that allows service-water needs to be met from treated geothermal-origin water, and AI-supported optimisation of reservoir management at hydroelectric plants to increase generation efficiency per unit of water. In the reporting year, water intensity was recorded at 5.0 m³/MWh against 3.9 m³/MWh in the previous year, and this outcome forms part of the performance assessment feeding the incentive framework.
[Add row]

(4.6) Does your organization have an environmental policy that addresses environmental issues?

	Does your organization have any environmental policies?
	Select from:

	Does your organization have any environmental policies?
	☑ Yes

[Fixed row]

(4.6.1) Provide details of your environmental policies.

Row 1

(4.6.1.1) Environmental issues covered

Select all that apply

☑ Climate change

(4.6.1.2) Level of coverage

Select from:

☑ Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

☑ Direct operations

☑ Upstream value chain

(4.6.1.4) Explain the coverage

Zorlu Enerji's Environmental Policy applies organization-wide across all activities of Zorlu Enerji Elektrik Üretim A.Ş. and its consolidated subsidiaries, covering generation, distribution, trading and e-mobility operations. Its climate commitments extend beyond direct operations: the policy explicitly addresses supply chain and procurement management, requiring environmental performance in the supply chain to be measured and monitored, contractors to be trained, and environmentally

responsible suppliers to be preferred in procurement processes; it also commits to collaboration with business partners and all stakeholders on environmental protection. The Company's Renewable Energy Commitment complements the policy with a commitment to become a 100% renewable company by 2030 and to invest exclusively in renewable energy sources in new investments. There are no geographical or business-activity exclusions from the policy's coverage.

(4.6.1.5) Environmental policy content

Environmental commitments

☑ Commitment to comply with regulations and mandatory standards

☑ Commitment to take environmental action beyond regulatory compliance

☑ Commitment to stakeholder engagement and capacity building on environmental issues

Climate-specific commitments

☑ Commitment to 100% renewable energy

☑ Commitment to net-zero emissions

☑ Commitment to not invest in fossil-fuel expansion

Additional references/Descriptions

☑ Description of environmental requirements for procurement

☑ Description of renewable electricity procurement practices

☑ Reference to timebound environmental milestones and targets

(4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

Select all that apply

☑ Yes, in line with the Paris Agreement

☑ Yes, in line with another global environmental treaty or policy goal, please specify :SBTi, UN Global Compact

(4.6.1.7) Public availability

Select from:

☑ Publicly available

(4.6.1.8) Attach the policy

Zorlu Enerji Environmental Policy Rev2.pdf

Row 2

(4.6.1.1) Environmental issues covered

Select all that apply

☑ Forests

(4.6.1.2) Level of coverage

Select from:

☑ Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

☑ Direct operations

☑ Upstream value chain

(4.6.1.4) Explain the coverage

Zorlu Enerji's Deforestation Combat Policy, signed by the CEO and the Chair of the Sustainability Committee, applies organization-wide across all operations of Zorlu Enerji Elektrik Üretim A.Ş. and its consolidated subsidiaries. Its commitments explicitly extend beyond direct operations to the upstream value chain: the Company commits to ensuring that its activities, both directly and throughout its supply chain, do not contribute to deforestation, and to managing deforestation-related risks in the supply chain by 2035. The policy is aligned with the Kunming-Montreal Global Biodiversity Framework and commits the Company to reaching a net positive impact on nature by 2035, moving beyond zero net deforestation.Forests exposure arises from land use at our generation and grid assets and from the upstream equipment supply chain, not from forest-risk commodity production or trading. There are no geographical or business-activity exclusions.Following its 2026 revision the policy also commits the Company to respecting internationally recognised human rights, the United Nations Guiding Principles on Business and Human Rights and the fundamental labour standards of the International Labour Organization in all geographies affected by our operations and supply chain, to respecting the customary rights of local communities and indigenous peoples to land, resources and living spaces, and to engaging with affected communities in line with the principle of Free, Prior and Informed Consent.

(4.6.1.5) Environmental policy content

Environmental commitments

☑ Commitment to a circular economy strategy

☑ Commitment to comply with regulations and mandatory standards

☑ Commitment to stakeholder engagement and capacity building on environmental issues

Forests-specific commitments

☑ Commitment to conduct or support restoration and/or compensation to remedy for past deforestation or conversion

☑ Commitment to no-conversion of natural ecosystems by target date

☑ Commitment to no-deforestation by target date

Social commitments

☑ Adoption of the UN International Labour Organization principles

☑ Commitment to respect and protect the customary rights to land, resources, and territory of Indigenous Peoples and Local Communities

☑ Commitment to respect internationally recognized human rights

☑ Commitment to secure Free, Prior, and Informed Consent (FPIC) of indigenous people and local communities

Additional references/Descriptions

☑ Reference to timebound environmental milestones and targets

(4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

Select all that apply

☑ Yes, in line with the Kunming-Montreal Global Biodiversity Framework

(4.6.1.7) Public availability

Select from:

☑ Publicly available

(4.6.1.8) Attach the policy

Zorlu Enerji Deforestation Policy Rev3.pdf

Row 3

(4.6.1.1) Environmental issues covered

Select all that apply

☑ Water

(4.6.1.2) Level of coverage

Select from:

☑ Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

☑ Direct operations

☑ Upstream value chain

(4.6.1.4) Explain the coverage

Zorlu Enerji's Environmental Policy, signed by the Sector President and the Chair of the Sustainability Committee, applies organization-wide across all activities of Zorlu Enerji Elektrik Üretim A.Ş. and its consolidated subsidiaries, covering generation, distribution, trading and e-mobility operations. The policy contains a dedicated Water Management commitment to using water resources efficiently and to reducing water withdrawal and consumption per unit of energy produced, to protecting water quality in the basins where we operate, to managing wastewater in accordance with applicable legislation, and to monitoring water performance at operations in water-stressed areas. A separate commitment recognises safe access to water and sanitation as a fundamental human right and commits the Company to improving WASH conditions in local communities and to assessing needs in this area within its community investment programmes. Coverage extends to the upstream value chain: the policy requires suppliers, contractors and service providers to operate in accordance with the adopted health, safety and environmental standards. The commitments are operationalised through our ISO 14001 environmental management system and ISO 14046 water footprint assessment, and are supported by the water withdrawal intensity and consumption targets reported in question 9.15.1. There are no geographical or business-activity exclusions from the policy's coverage.

(4.6.1.5) Environmental policy content

Environmental commitments

☑ Commitment to comply with regulations and mandatory standards

☑ Commitment to take environmental action beyond regulatory compliance

☑ Commitment to stakeholder engagement and capacity building on environmental issues

Water-specific commitments
☑ Commitment to control/reduce/eliminate water pollution
☑ Commitment to reduce water consumption volumes
☑ Commitment to reduce water withdrawal volumes
☑ Commitment to safely managed WASH in local communities
☑ Commitment to the conservation of freshwater ecosystems

(4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

Select all that apply
☑ Yes, in line with Sustainable Development Goal 6 on Clean Water and Sanitation

(4.6.1.7) Public availability

Select from:
☑ Publicly available

(4.6.1.8) Attach the policy

Zorlu Enerji Environmental Policy Rev2.pdf

Row 4

(4.6.1.1) Environmental issues covered

Select all that apply
☑ Biodiversity

(4.6.1.2) Level of coverage

Select from:

☑ Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

☑ Direct operations

☑ Upstream value chain

(4.6.1.4) Explain the coverage

Zorlu Enerji's Biodiversity Protection Policy, signed by the CEO and the Chair of the Sustainability Committee, applies organization-wide across all activities and businesses of Zorlu Enerji Elektrik Üretim A.Ş. and its subsidiaries, covering construction, operation and decommissioning phases across power generation, electricity distribution and infrastructure projects. The policy explicitly extends beyond direct operations to the value chain, requiring suppliers and partners to adhere to biodiversity-conscious practices. It commits the Company to achieving a net positive impact on biodiversity, to establishing measurable targets for habitat restoration, species population increases and ecosystem service improvements, and to refraining from operational activities near sites containing globally or nationally significant biodiversity unless exceptional circumstances exist and a robust mitigation plan is in place. The policy is guided by the UN Convention on Biological Diversity and Türkiye's National Biological Diversity Action Plan. There are no geographical or business-activity exclusions.

(4.6.1.5) Environmental policy content

Environmental commitments

☑ Commitment to No Net Loss

☑ Commitment to Net Positive Gain

☑ Commitment to respect legally designated protected areas

☑ Commitment to comply with regulations and mandatory standards

☑ Commitment to take environmental action beyond regulatory compliance

☑ Commitment to avoidance of negative impacts on threatened and protected species

☑ Commitment to stakeholder engagement and capacity building on environmental issues

☑ Commitment to implementation of nature-based solutions that support landscape restoration and long-term protection of natural ecosystems

Additional references/Descriptions

☑ Description of biodiversity-related performance standards

☑ Description of dependencies on natural resources and ecosystems

☑ Description of impacts on natural resources and ecosystems

☑ Description of environmental requirements for procurement
☑ Reference to timebound environmental milestones and targets

(4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

Select all that apply
☑ Yes, in line with the Kunming-Montreal Global Biodiversity Framework

(4.6.1.7) Public availability

Select from:
☑ Publicly available

(4.6.1.8) Attach the policy

Zorlu Enerji Biodiversity Protection Policy.pdf,Zorlu Enerji Deforestation Policy Rev3.pdf
[Add row]

(4.10) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

(4.10.1) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

Select from:
☑ Yes

(4.10.2) Collaborative framework or initiative

Select all that apply
☑ Science-Based Targets Initiative (SBTi)
☑ UN Global Compact
☑ World Business Council for Sustainable Development (WBCSD)
☑ Other, please specify :TÜSİAD, ERTA, TKSD, Chapter Zero

(4.10.3) Describe your organization’s role within each framework or initiative

Zorlu Enerji is a signatory of the UN Global Compact (UNGC) and integrates its Ten Principles, including the environmental principles on precautionary approach, environmental responsibility and diffusion of environmentally friendly technologies, into its corporate sustainability strategy; the Company reports annually through the UNGC Communication on Progress and also participates in the UNGC CFO Taskforce. Zorlu Enerji's near- and long-term emission reduction targets have been validated by the Science Based Targets initiative (SBTi), aligning the Company with a 1.5°C pathway. The Company is a member of SKD Türkiye, the Turkish global network partner of the World Business Council for Sustainable Development (WBCSD), where it contributes technical expertise and sectoral insight on climate, natural resource and nature-related workstreams. Zorlu Enerji also participates in the TÜSİAD Environment and Net Zero Policies Working Group and TÜSİAD Chapter Zero Türkiye, providing technical input and policy recommendations on climate, energy and environmental issues, and is a member of the Integrated Reporting Türkiye Network (ERTA) and the Corporate Responsibility Association of Türkiye (TKSD). The Company is also a signatory of the UN Women's Empowerment Principles (WEPs).
[Fixed row]

(4.11) In the reporting year, did your organization engage in activities that could directly or indirectly influence policy, law, or regulation that may (positively or negatively) impact the environment?

(4.11.1) External engagement activities that could directly or indirectly influence policy, law, or regulation that may impact the environment

Yes

☑ Yes, we engaged directly with policy makers

☑ Yes, we engaged indirectly through, and/or provided financial or in-kind support to a trade association or other intermediary organization or individual whose activities could influence policy, law, or regulation

(4.11.2) Indicate whether your organization has a public commitment or position statement to conduct your engagement activities in line with global environmental treaties or policy goals

Select from:

☑ Yes, we have a public commitment or position statement in line with global environmental treaties or policy goals

(4.11.3) Global environmental treaties or policy goals in line with public commitment or position statement

Select all that apply

☑ Paris Agreement
☑ Kunming-Montreal Global Biodiversity Framework
☑ Sustainable Development Goal 6 on Clean Water and Sanitation

(4.11.4) Attach commitment or position statement

Responsible Lobbying Report.pdf

(4.11.5) Indicate whether your organization is registered on a transparency register

Select from:
☑ Yes, the intermediary organization we engage through is registered

(4.11.6) Types of transparency register your organization is registered on

Select all that apply
☑ Voluntary government register

(4.11.7) Disclose the transparency registers on which your organization is registered & the relevant ID numbers for your organization

EU Transparency Register — TÜSİAD (Turkish Industry & Business Association), Registration ID: 38870176589-43, status: activated, category: trade and business associations. Zorlu Enerji engages in policy discussion through its membership of TÜSİAD, including the Energy Working Group and the Environment and Net Zero Policies Working Group.

(4.11.8) Describe the process your organization has in place to ensure that your external engagement activities are consistent with your environmental commitments and/or transition plan

Zorlu Enerji manages its policy engagement and trade association memberships through a governance system set out in its annual Responsible Lobbying Report, covering all business lines, subsidiaries and geographies. The report contains a public commitment that all public policy and advocacy activities, whether conducted directly or through the organisations of which we are a member, are aligned with global environmental treaties: climate and energy engagement with the 1.5°C objective of the Paris Agreement, water-related engagement with Sustainable Development Goal 6, and biodiversity- and forest-related engagement with the Kunming-Montreal Global Biodiversity Framework. These commitments follow from our identified environmental dependencies, impacts, risks and opportunities: carbon pricing and transition risk across a 100% renewable portfolio; water dependency and local water stress at geothermal, hydroelectric and solar sites; and land-use and habitat impacts at generation and transmission assets. Public policy strategy is set at CEO and General Manager level and approved by the Board of

Directors; the Audit Committee reviews the compliance of lobbying activities with ethical standards and corporate values. Day-to-day engagement is managed by the Corporate Communications, Sustainability and Legal departments; the environmental impacts of investments are monitored by the Sustainability, Quality and OHS-E Group Directorate. Alignment is verified in two stages: before joining an association its statutes and positions are screened against our environmental commitments and 1.5°C objective; during membership the public positions and lobbying activities of each organisation are assessed annually by the Sustainability Committee. Where a misalignment is identified, an escalating process applies: our formal position is communicated to the association's working groups and management; if it persists, we publicly state our independent position; and if constructive change is not achieved within a defined period, membership is suspended or terminated with Senior Management approval. In 2025 every direct engagement was individually assessed and found aligned with the Paris Agreement, and no conflict was identified between the positions of our member associations and our net zero strategy. Allegations of misconduct in lobbying are investigated by the Internal Audit, Control and Risk Management General Directorate and reported to the Ethics Committee; none arose in 2025.
[Fixed row]

(4.11.1) On what policies, laws, or regulations that may (positively or negatively) impact the environment has your organization been engaging directly with policy makers in the reporting year?

Row 1

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

Turkish Climate Law (Law No. 7552) and its secondary regulations, including the establishment of the Turkish Emissions Trading System (ETS) and the associated Monitoring, Reporting and Verification (MRV) framework

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

Select all that apply

☑ Climate change

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Financial mechanisms (e.g., taxes, subsidies, etc.)

☑ Carbon offsets

☑ Emissions trading schemes

(4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:

☑ National

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

Select all that apply

☑ Turkey

(4.11.1.6) Your organization’s position on the policy, law, or regulation

Select from:

☑ Support with no exceptions

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

☑ Participation in working groups organized by policy makers

☑ Responding to consultations

☑ Submitting written proposals/inquiries

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

The Turkish Climate Law and the Emissions Trading System introduce carbon pricing into Zorlu Enerji's operating environment and are directly relevant to the Company's transition plan, which assumes carbon pricing from 2027 rising from EUR 11.6/tCO_2e to EUR 254.9/tCO_2e by 2040 under the NZE scenario. Zorlu Enerji supports the implementation of a comprehensive legal framework covering the Climate Law, its secondary regulations and MRV processes, and advocates for an inclusive national transition to a low-carbon economy. Engagement is conducted through the TÜSİAD Energy Working Group and the Environment and Net Zero Policies Working Group, supporting the inclusive implementation of greenhouse gas monitoring, reporting and verification processes and contributing to cross-sectoral knowledge sharing. As a company with a 100% renewable generation portfolio and SBTi-validated targets, a robust carbon pricing framework supports the competitiveness of low-carbon generation and the achievement of our 2030 interim and 2040 Net Zero targets. Success is measured by the adoption of an MRV

framework consistent with international standards, the inclusion of geothermal-specific emission characteristics in ETS design, and continued alignment between the positions of the trade associations we belong to and our own climate targets. The Company also aims to help close knowledge gaps between sectoral actors, consultants, verifiers and government bodies.

(4.11.1.11) Indicate if you have evaluated whether your organization's engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

Select all that apply

☑ Paris Agreement

Row 2

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

Türkiye Green Taxonomy Draft Regulation — a sustainable finance classification framework establishing technical screening criteria for climate change mitigation and climate change adaptation objectives

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

Select all that apply

☑ Climate change

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Other

☑ Adaptation taxonomies

(4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:

☑ National

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

Select all that apply

☑ Turkey

(4.11.1.6) Your organization’s position on the policy, law, or regulation

Select from:

☑ Support with no exceptions

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

☑ Participation in working groups organized by policy makers

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

Türkiye's Green Taxonomy Draft Regulation establishes technical screening criteria determining which economic activities qualify as environmentally sustainable, with greenhouse gas mitigation and climate adaptation as its primary environmental objectives. It directly affects Zorlu Enerji's access to sustainable finance and the eligibility of its renewable generation and grid investments, and the Company has an existing corporate objective to make investments aligned with the green taxonomy. Zorlu Enerji contributes to the taxonomy's development through the Green Taxonomy Sub-Working Group established within SKD Türkiye, participating in its workshop convened in February 2026 and providing technical feedback from the perspective of the energy and infrastructure sector on the applicability of sectoral technical thresholds, data infrastructure and measurement requirements, integration into financing processes, alignment of reporting and indicator sets, and the definition of transition activities. Our engagement supports a taxonomy framework that reflects the technical realities of renewable generation in Türkiye, including the specific characteristics of geothermal resources, while maintaining environmental integrity. Success is measured by the adoption of a taxonomy consistent with international practice and by the eligibility of the Company's renewable generation and grid investments under the final criteria.

(4.11.1.11) Indicate if you have evaluated whether your organization’s engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

Select all that apply

☑ Paris Agreement

Row 3

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

Türkiye's climate change mitigation strategy and action plan — energy transition component, developed by the Ministry of Environment, Urbanisation and Climate Change

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

Select all that apply

☑ Climate change

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Energy and renewables

☑ Alternative fuels

☑ Renewable energy generation

☑ Energy efficiency requirements

☑ Energy attribute certificate systems

☑ Electricity grid access for renewables

☑ Low-carbon, non-renewable energy generation

☑ Green electricity tariffs/renewable energy PPAs

(4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:

☑ National

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

Select all that apply

☑ Turkey

(4.11.1.6) Your organization’s position on the policy, law, or regulation

Select from:

☑ Support with no exceptions

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

☑ Participation in working groups organized by policy makers

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

Türkiye's climate change mitigation strategy sets the national framework for emission reduction pathways across sectors, with the energy transition component directly shaping the operating environment for renewable generation, grid modernisation and energy storage — the areas in which Zorlu Enerji's investment programme is concentrated. Zorlu Enerji participated in the workshop convened by the Ministry of Environment, Urbanisation and Climate Change and provided technical feedback on the energy transition component, drawing on operational experience across geothermal, wind, hydroelectric and solar generation as well as electricity distribution and retail. Our engagement supports an ambitious and implementable national mitigation pathway for the energy sector, consistent with the Company's own SBTi-validated targets to reduce Scope 1 emissions intensity from electricity generation by 73.71% per MWh by 2030 and to reach Net Zero by 2040.

Success is measured by the extent to which the final strategy provides a predictable framework for renewable capacity expansion, grid flexibility and storage deployment, and by its consistency with a 1.5°C-aligned decarbonisation trajectory for the Turkish power sector.

(4.11.1.11) Indicate if you have evaluated whether your organization's engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

Select all that apply

☑ Paris Agreement

Row 4

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

Water Efficiency Regulation (Su Verimliliği Yönetmeliği), issued by the Ministry of Agriculture and Forestry and in force since 27 December 2024, with its Blue Water Certificate (Mavi Su Belgesi) scheme. In-scope facilities must establish a water balance, meter consumption points, set efficiency targets and obtain the certificate by 27 June 2026 (industrial) or 27 September 2026 (public and service buildings). Non-compliance carries administrative fines and suspension of operations.

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

Select all that apply

☑ Water

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Low-impact production and innovation

☑ Water use and efficiency

(4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:

☑ National

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

Select all that apply

☑ Turkey

(4.11.1.6) Your organization’s position on the policy, law, or regulation

Select from:

☑ Support with no exceptions

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

☑ Responding to consultations

☑ Submitting written proposals/inquiries

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

Water efficiency regulation is directly relevant to our water stewardship commitments and to the water-related targets we have set on withdrawal, reinjection and efficiency. Our water profile is unusual: the overwhelming majority of reported withdrawal is non-consumptive hydroelectric pass-through, while geothermal operations return most extracted fluid to the reservoir through reinjection. A regulation that measures performance on withdrawal volume alone, without distinguishing consumptive from non-consumptive use or recognising reinjection, would misrepresent the water performance of renewable generation and could impose monitoring obligations that deliver no basin-level benefit. Our engagement therefore focused on three points: that the water balance methodology should distinguish consumptive from non-consumptive use; that geothermal reinjection should be recognised as return to source; and that the certification pathway should reward measurable efficiency improvement rather than absolute volume alone. We supported the regulation as published, having provided written feedback to the Ministry during its development. We also support the regulation because it strengthens basin-level water governance in Türkiye. Several of our operating sites sit in basins classified as

water-stressed under the WRI Aqueduct Water Risk Atlas and the WWF Water Risk Filter, and a national framework that obliges large water users to measure and reduce consumption improves the resilience of those basins for all users, ourselves included. Success is measured by whether our facilities complete water balance studies and obtain Blue Water Certificates within the 2026 deadlines, by the reduction in water withdrawal intensity achieved against our targets, and by whether the final methodology recognises reinjection and non-consumptive use in the way we proposed.

(4.11.1.11) Indicate if you have evaluated whether your organization's engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

Select all that apply

☑ Sustainable Development Goal 6 on Clean Water and Sanitation

Row 5

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

EU Deforestation Regulation (EUDR, Regulation (EU) 2023/1115) and its implementation for Turkish operators. It prohibits placing on the EU market commodities associated with deforestation or forest degradation, and requires operators to conduct due diligence covering geolocation of production plots, risk assessment and risk mitigation. We engage through the Environment and Net Zero Policies Working Group and Ministry of Trade consultations with the European Commission.

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

Select all that apply

☑ Forests

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Low-impact production and innovation

☑ Deforestation-free products

(4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:

☑ Regional

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

Select all that apply

☑ Europe

(4.11.1.6) Your organization's position on the policy, law, or regulation

Select from:

☑ Support with no exceptions

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

☑ Participation in working groups organized by policy makers

☑ Responding to consultations

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

The EU Deforestation Regulation is relevant to our anti-deforestation commitment and to the deforestation- and conversion-free expectations we place on suppliers. Our own forest risk commodity exposure is limited: we source timber products, rubber and coffee, totalling approximately 63.9 tonnes in the reporting year, and we neither produce nor trade forest risk commodities. The Regulation matters to us less as a compliance burden than as the mechanism that makes traceability and geolocation data available across supply chains, which is the data we need to verify that our own anti-deforestation commitment is being met in practice rather than only in policy. Our engagement supported the Regulation and focused on implementation. We argued for proportionate due diligence obligations for operators whose forest risk commodity volumes are immaterial, so that limited-exposure buyers can rely on supplier attestations and geolocation data rather than duplicating full risk

assessments, and for clear guidance and adequate transition time for suppliers in non-EU countries so that compliance strengthens forest protection rather than simply diverting trade to less regulated markets. Success is measured by whether deforestation-free requirements become verifiable in our procurement process, by the proportion of our timber-based purchases for which supplier-level traceability evidence is obtained, and by whether implementation guidance provides the proportionate treatment for low-volume operators that we proposed.

(4.11.1.11) Indicate if you have evaluated whether your organization's engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

Select all that apply

☑ Kunming-Montreal Global Biodiversity Framework

[Add row]

(4.11.2) Provide details of your indirect engagement on policy, law, or regulation that may (positively or negatively) impact the environment through trade associations or other intermediary organizations or individuals in the reporting year.

Row 1

(4.11.2.1) Type of indirect engagement

Select from:

☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

Europe

☑ Other trade association in Europe, please specify :TÜSİAD (Turkish Industry and Business Association)

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☑ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☑ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☑ No, we did not attempt to influence their position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

TÜSİAD supports Türkiye's net zero 2053 target, the implementation of the Turkish Emissions Trading System, the Green Taxonomy and the alignment of national climate legislation with the Paris Agreement. In the reporting year it published position papers on carbon pricing and the EU Carbon Border Adjustment Mechanism, and ran consultations on the Turkish Climate Law and its secondary legislation. Zorlu Enerji's position is consistent with these positions. Our SBTi-validated targets, our 2040 net zero commitment and our support for the Turkish ETS as reported in 4.11.1 align with the association's advocacy on carbon pricing and climate legislation. We participate in the TÜSİAD Environment and Climate Change Working Group and TÜSİAD Chapter Zero Türkiye, where we contribute operational experience from geothermal, wind and distribution operations to the development of these positions. Because our position is consistent with the association's, we did not attempt to influence it. Association positions are reviewed annually against our Environmental Policy and climate targets as part of the responsible lobbying process described in our Responsible Lobbying Report; no inconsistency was identified in the reporting year. Had one been identified, it would have been escalated to the Sustainability Committee. Zorlu Enerji did not provide funding to the association in the reporting year. Membership is held and the annual fee is paid at Zorlu Holding level, and no separate financial or in-kind support was provided by Zorlu Enerji.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

0

(4.11.2.11) Indicate if you have evaluated whether your organization’s engagement is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization’s engagement on policy, law or regulation

Select all that apply

☑ Paris Agreement

Row 2

(4.11.2.1) Type of indirect engagement

Select from:

☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

Europe

☑ Other trade association in Europe, please specify :SKD Türkiye (Business Council for Sustainable Development Türkiye)

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☑ Climate change

(4.11.2.6) Indicate whether your organization’s position is consistent with the organization or individual you engage with

Select from:

☑ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual’s position in the reporting year

Select from:

☑ No, we did not attempt to influence their position

(4.11.2.8) Describe how your organization’s position is consistent with or differs from the organization or individual’s position, and any actions taken to influence their position

SKD Türkiye advocates for a low-carbon and circular economy transition in Türkiye, supporting science-based corporate climate targets, renewable energy deployment, energy efficiency legislation and sustainability reporting frameworks aligned with the Paris Agreement. In the reporting year it ran working groups and published guidance on climate transition and circular economy practices for Turkish business. Zorlu Enerji's position is consistent. Our decarbonisation strategy, SBTi-validated targets and circular economy practices in the distribution business align directly with the council's advocacy. We contribute to its working groups on climate and circularity. Because our position is consistent, we did not attempt to influence it. The council's positions are reviewed annually against our environmental commitments through our responsible lobbying process; no inconsistency was identified in the reporting year.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

80000

(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

The funding consists solely of the annual membership fee paid to the association; no additional financial or in-kind support was provided, so no estimation of in-kind value was required. Its aim is to maintain membership and representation, giving Zorlu Enerji access to the association's working groups and enabling the Company to contribute operational experience to the sectoral positions the association develops on energy and environmental legislation. No part of the fee is earmarked for lobbying or for activities aimed at influencing public policy. Any influence on policy, law or regulation is therefore indirect, arising from the association's own advocacy activity. Through this membership we expect continued access to the council's climate and circular economy working groups and to the guidance and benchmarking outputs they produce for Turkish business.

(4.11.2.11) Indicate if you have evaluated whether your organization’s engagement is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply

☑ Paris Agreement

Row 3

(4.11.2.1) Type of indirect engagement

Select from:

☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

Europe

☑ Other trade association in Europe, please specify :JED (Geothermal Power Plant Investors Association of Türkiye)

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☑ Climate change

☑ Water

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☑ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual’s position in the reporting year

Select from:

☑ No, we did not attempt to influence their position

(4.11.2.8) Describe how your organization’s position is consistent with or differs from the organization or individual’s position, and any actions taken to influence their position

JED advocates for the development of geothermal energy in Türkiye and engages on the regulatory framework governing geothermal resources, including reinjection obligations, geothermal fluid discharge standards, water quality parameters and licensing procedures. It supports regulation that requires reinjection of geothermal fluid to protect reservoir sustainability and receiving water bodies, and supports geothermal as a baseload renewable technology contributing to Türkiye's decarbonisation. Zorlu Enerji's position is consistent on both issues. As the largest geothermal operator in Türkiye we return the majority of extracted fluid to the reservoir through reinjection rather than to surface water, which is the practice the association advocates as the sector standard, and our water targets on withdrawal and reinjection align with it. On climate, geothermal is central to our baseload renewable portfolio and to the emission intensity trajectory underpinning our SBTi targets. Because our position is consistent, we did not attempt to influence it. We contribute technical input on reinjection performance and non-condensable gas management to the association's technical work. Positions are reviewed annually against our Environmental Policy and water targets; no inconsistency was identified in the reporting year.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

125000

(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

The funding consists solely of the annual membership fee paid to the association; no additional financial or in-kind support was provided, so no estimation of in-kind value was required. Its aim is to maintain membership and representation, giving Zorlu Enerji access to the association's working groups and enabling the Company to contribute operational experience to the sectoral positions the association develops on energy and environmental legislation. No part of the fee is earmarked for lobbying or for activities aimed at influencing public policy. Any influence on policy, law or regulation is therefore indirect, arising from the association's own advocacy activity. Through this membership we expect continued participation in the association's technical work on reinjection performance, geothermal fluid discharge standards and non-condensable gas management, to which we contribute operating data from our geothermal assets.

(4.11.2.11) Indicate if you have evaluated whether your organization’s engagement is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply

☑ Paris Agreement

☑ Sustainable Development Goal 6 on Clean Water and Sanitation

Row 4

(4.11.2.1) Type of indirect engagement

Select from:

☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

Europe

☑ Other trade association in Europe, please specify :TÜREB (Turkish Wind Energy Association)

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☑ Climate change

☑ Forests

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☑ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual’s position in the reporting year

Select from:

☑ No, we did not attempt to influence their position

(4.11.2.8) Describe how your organization’s position is consistent with or differs from the organization or individual’s position, and any actions taken to influence their position

TÜREB advocates for the expansion of wind energy in Türkiye and engages on the permitting framework governing wind projects, including environmental impact assessment procedures, forest permits for turbine sites and access roads, land use and afforestation obligations, and grid connection rules. It supports permitting that is efficient while maintaining environmental safeguards, including compensatory afforestation where forest land is used. Zorlu Enerji's position is consistent on both issues. Wind is the largest component of our planned generation capital expenditure, making the association's climate and permitting advocacy directly aligned with our transition plan. On forests, our anti-deforestation commitment and our practice of compensatory afforestation and habitat restoration at project sites align with the association's support for maintaining environmental safeguards and afforestation obligations within the permitting regime. Because our position is consistent, we did not attempt to influence it. Positions are reviewed annually against our Environmental Policy, Deforestation Combat Policy and Biodiversity Protection Policy; no inconsistency was identified in the reporting year.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

130000

(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

The funding consists solely of the annual membership fee paid to the association; no additional financial or in-kind support was provided, so no estimation of in-kind value was required. Its aim is to maintain membership and representation, giving Zorlu Enerji access to the association's working groups and enabling the Company to contribute operational experience to the sectoral positions the association develops on energy and environmental legislation. No part of the fee is earmarked for lobbying or for activities aimed at influencing public policy. Any influence on policy, law or regulation is therefore indirect, arising from the association's own advocacy activity. Through this membership we expect continued participation in the association's work on wind project permitting, including environmental impact assessment procedures, forest permits and compensatory afforestation obligations, and on grid connection rules.

(4.11.2.11) Indicate if you have evaluated whether your organization’s engagement is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply

☑ Paris Agreement

☑ Kunming-Montreal Global Biodiversity Framework

Row 5

(4.11.2.1) Type of indirect engagement

Select from:

☑ Indirect engagement via other intermediary organization or individual

(4.11.2.2) Type of organization or individual

Select from:

☑ Research organization

(4.11.2.3) State the organization or position of individual

Sabancı University Istanbul International Center for Energy and Climate (IICEC) — an independent energy and climate research centre producing analysis on Türkiye's energy transition, including the Türkiye Energy Outlook, which informs public policy debate on decarbonisation, renewable deployment and energy efficiency.

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☑ Climate change

(4.11.2.6) Indicate whether your organization’s position is consistent with the organization or individual you engage with

Select from:

☑ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual’s position in the reporting year

Select from:

☑ No, we did not attempt to influence their position

(4.11.2.8) Describe how your organization’s position is consistent with or differs from the organization or individual’s position, and any actions taken to influence their position

IICEC produces independent, data-driven analysis of Türkiye's energy transition. Its Türkiye Energy Outlook models pathways consistent with the national net zero 2053 target and with Paris Agreement objectives, and supports accelerated renewable deployment, electrification, energy efficiency and grid investment. Its analysis is used by policy makers, regulators and industry in the development of national energy and climate policy. Zorlu Enerji's position is consistent with this analysis. Our transition plan, renewable investment pipeline and SBTi-validated targets align with the decarbonisation pathways the centre models. We engage through its programmes and contribute operational data and sector experience to its research on renewable generation, distribution networks and electric vehicle charging. Because our position is consistent, we did not attempt to influence it. The centre is a research institution rather than an advocacy organization, and its outputs are independent; we support it in order to strengthen the evidence base available to policy makers rather than to promote a particular position. Its outputs are reviewed against our environmental commitments; no inconsistency was identified in the reporting year.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

2142710

(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

The funding is provided as programme support to an independent energy and climate research centre. Its aim is to strengthen the quality and independence of the evidence base available to Turkish policy makers on the energy transition, through outputs including the Türkiye Energy Outlook and related analysis on renewable deployment, electrification, grid investment and energy efficiency. The support is not directed at any specific policy position, and the centre retains full editorial independence over its research and conclusions. Expected outcomes are published research reports and modelling that inform public debate and policy development on decarbonisation pathways consistent with Türkiye's net zero 2053 target. No part of the funding is provided as in-kind support, so no estimation of monetary value was required.

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply

☑ Paris Agreement

[Add row]

(4.12) Have you published information about your organization's response to environmental issues for this reporting year in places other than your CDP response?

Select from:

☑ Yes

(4.12.1) Provide details on the information published about your organization's response to environmental issues for this reporting year in places other than your CDP response. Please attach the publication.

Row 1

(4.12.1.1) Publication

Select from:

☑ In mainstream reports

(4.12.1.2) Is your publication in line with a standard or framework?

Select from:

☑ Yes

(4.12.1.3) Standard or framework the publication is in line with

Select all that apply

☑ ESRS

☑ GRI

(4.12.1.4) Environmental issues covered in publication

Select all that apply

☑ Climate change

☑ Forests

☑ Water

☑ Biodiversity

(4.12.1.5) Status of the publication

Select from:

☑ Complete

(4.12.1.6) Content elements

Select all that apply

☑ Strategy

☑ Governance

☑ Risks & Opportunities

☑ Water-related targets

☑ Value chain engagement

☑ Water accounting figures

☑ Greenhouse gas emissions figures

☑ Content of environmental policies

☑ Forest-related targets

☑ Dependencies & Impacts

☑ Biodiversity indicators

☑ Public policy engagement

☑ Climate-related targets

(4.12.1.7) Page/section reference

Sustainability governance and memberships: pp. 86–89; Climate Change: pp. 90–107; Energy Management: pp. 102–107; Biodiversity and Ecosystems: pp. 108–119; Water Footprint / Water and Marine Resources: pp. 120–125; Circularity and Natural Resource Management: pp. 126–131

(4.12.1.8) Attach the relevant publication

Zorlu Enerji Integrated Annual Report 2025.pdf

Row 2

(4.12.1.1) Publication

Select from:

☑ In mainstream reports

(4.12.1.2) Is your publication in line with a standard or framework?

Select from:

☑ Yes

(4.12.1.3) Standard or framework the publication is in line with

Select all that apply

☑ IFRS

☑ TCFD

☑ Other, please specify :SASB

(4.12.1.4) Environmental issues covered in publication

Select all that apply

☑ Climate change

☑ Forests

☑ Water

☑ Biodiversity

(4.12.1.5) Status of the publication

Select from:

☑ Complete

(4.12.1.6) Content elements

Select all that apply

☑ Strategy

☑ Governance

☑ Risks & Opportunities

☑ Water-related targets

☑ Dependencies & Impacts

☑ Biodiversity indicators

☑ Public policy engagement

☑ Climate-related targets

☑ Water accounting figures

☑ Greenhouse gas emissions figures

(4.12.1.7) Page/section reference

Governance: pp. 16–22; Strategy and climate-related risks: pp. 24–57; Risk Management: pp. 60–63; Metrics and Targets: pp. 66–75; Limited Assurance Report: pp. 85–87

(4.12.1.8) Attach the relevant publication

Zorlu Enerji TSRS Report 2025.pdf
[Add row]

C5. Business strategy

(5.1) Does your organization use scenario analysis to identify environmental outcomes?

Climate change

(5.1.1) Use of scenario analysis

Select from:
☑ Yes

(5.1.2) Frequency of analysis

Select from:
☑ Annually

Forests

(5.1.1) Use of scenario analysis

Select from:
☑ Yes

(5.1.2) Frequency of analysis

Select from:
☑ Annually

Water

(5.1.1) Use of scenario analysis

Select from:

☑ Yes

(5.1.2) Frequency of analysis

Select from:
☑ Annually
[Fixed row]

(5.1.1) Provide details of the scenarios used in your organization’s scenario analysis.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios
☑ NGFS scenarios framework, please specify :Net zero 2050 (Orderly Transition)

(5.1.1.3) Approach to scenario

Select from:
☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:
☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply
☑ Policy
☑ Market
☑ Chronic physical

☑ Reputation
☑ Technology
☑ Acute physical

(5.1.1.6) Temperature alignment of scenario

Select from:
☑ 1.5°C or lower

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

Select all that apply
☑ 2025
☑ 2030
☑ 2040
☑ 2050
☑ Other, please specify :2026

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts
☑ Climate change (one of five drivers of nature change)

Finance and insurance
☑ Cost of capital
☑ Sensitivity of capital (to nature impacts and dependencies)

Stakeholder and customer demands
☑ Consumer attention to impact

Regulators, legal and policy regimes

☑ Global regulation

☑ Level of action (from local to global)

☑ Global targets

☑ Methodologies and expectations for science-based targets

Relevant technology and science

☑ Granularity of available data (from aggregated to local)

☑ Data regime (from closed to open)

Direct interaction with climate

☑ On asset values, on the corporate

Macro and microeconomy

☑ Domestic growth

☑ Globalizing markets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Assumptions: global CO2 emissions decline immediately and reach net zero around 2050, giving a roughly 50% chance of limiting warming to 1.5°C with limited or no overshoot; stringent climate policy is introduced early and tightened progressively, and innovation is deployed at pace. Carbon pricing rises from EUR 5.8/tCO2e in 2026 to EUR 67.7/tCO2e in 2030, EUR 254.9/tCO2e in 2040 and EUR 442.1/tCO2e in 2050. Clean electricity share, electrification rates and electric vehicle penetration increase fastest under this pathway, while distributed energy resource penetration in the OEDAS territory rises from 2% in 2025 to 23% by 2040. Physical hazard indices increase least of the four pathways. Uncertainties: the pace at which the Turkish Emissions Trading System moves from free allocation to benchmark-based allocation, and the benchmark value that will apply to geothermal non-condensable gas emissions; the speed of prosumer adoption relative to tariff reform; the availability and cost of low-carbon equipment when global demand accelerates simultaneously. Constraints: the pathway assumes globally coordinated early action, which may not translate uniformly to Turkish policy timing; carbon price levels beyond 2035 carry wide estimation error, and because geothermal exposure is priced only on emissions above benchmark, results are highly sensitive to a benchmark that regulation has not yet defined. The scenario covers all consolidated operations of Zorlu Enerji Elektrik Uretim A.S. and its subsidiaries.

(5.1.1.11) Rationale for choice of scenario

Zorlu Enerji uses the Net Zero 2050 scenario as the ambition case against which the credibility of its own decarbonization pathway is tested. Because the Company's SBTi-validated 2030 interim target and 2040 net zero commitment are framed against a 1.5°C trajectory, this scenario is the reference point for assessing whether the strategy remains coherent in a world that actually delivers that trajectory. The scenario is deliberately selected as the most demanding transition case. It produces the

highest carbon price path of the four pathways and therefore the largest modelled exposure for geothermal Scope 1 emissions under the Turkish ETS, which allows the Company to size a worst-case compliance cost and to steer capital allocation towards emission reduction at source through the GECO reinjection and JESKE non-condensable gas programmes. It is equally the scenario in which transition opportunity is greatest. Rapid electrification, growth in electric vehicle charging demand and higher renewable certificate prices are strongest here, while the same forces produce the Company's largest modelled downside in retail supply as customers move to distributed generation. Running both effects within a single pathway allows the Board to see the transition as a net position rather than as isolated risks and opportunities, and it was this analysis that supported the establishment of Zorlu Dengeleme Enerji Yonetimi A.S. and the acquisition of a 20-year aggregation licence. The scenario is also used to test financing assumptions, since sustainability-linked funding conditions and the cost of capital are most favourable under an orderly early transition.

Forests

(5.1.1.1) Scenario used

Water scenarios

☑ WWF Water Risk Filter

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Acute physical

☑ Chronic physical

☑ Reputation

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025

☑ 2030

☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Changes to the state of nature

☑ Number of ecosystems impacted

☑ Changes in ecosystem services provision

☑ Speed of change (to state of nature and/or ecosystem services)

☑ Climate change (one of five drivers of nature change)

Stakeholder and customer demands

☑ Impact of nature footprint on reputation

Regulators, legal and policy regimes

☑ Global regulation

☑ Level of action (from local to global)

Relevant technology and science

☑ Granularity of available data (from aggregated to local)

Direct interaction with climate

☑ On asset values, on the corporate

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Assumptions: the WWF Water Risk Filter applies a scenario framework combining climate pathways with socio-economic pathways — Optimistic (RCP2.6/RCP4.5 with SSP1, moderate emissions halved by 2050, global mean surface temperature unlikely to exceed 2°C by 2100, sustainability-oriented governance and rapid technological change); Current Trend (RCP4.5/RCP6.0 with SSP2, intermediate emissions peaking around mid-century, temperature likely to exceed 2°C, weak coordination between institutions and modest decline in resource use intensity); and Pessimistic (RCP6.0/RCP8.5 with SSP3, high emissions continuing to rise throughout the century, temperature likely to exceed 4°C, regional rivalry, low investment in technology, environmental policies of very little importance and serious degradation of environmental systems in some regions). Basin-level projections are produced for 2030 and 2050. Indicators relevant to forests and land include ecosystem services status — informed by catchment degradation through forest loss, given the role of forests in water regulation, supply and pollution control — alongside biodiversity importance and cultural importance within the basin reputational risk layer. Uncertainties: basin-scale indicators may not capture site-specific land cover conditions; the delineation of areas of biodiversity importance is incomplete, being restricted by administrative, logistical and funding constraints, meaning sites meeting the relevant criteria may exist but not yet be formally identified. Constraints: the tool provides a macro-level basin assessment and does not substitute for site-level habitat surveys; global indicators may not be applicable in all local conditions. The assessment covers all operational sites of Zorlu Enerji Elektrik Üretim A.Ş. and its subsidiaries.

(5.1.1.11) Rationale for choice of scenario

As a renewable energy company, Zorlu Enerji's forests exposure arises from land use in the siting and operation of generation and grid assets and from the embedded land-use footprint of the upstream supply chain, rather than from the production or trading of forest-risk commodities. The WWF Water Risk Filter scenario framework was selected because it projects how basin-level ecosystem services status — including catchment degradation through forest loss — and biodiversity importance evolve under differentiated climate and socio-economic pathways to 2030 and 2050, providing forward-looking insight into the landscapes in which our assets are located. The analysis showed that basin biodiversity importance scores remain broadly stable to 2030 but begin to diverge between scenarios by 2050, with several sites including Alaşehir GPP, Uşak OEDAŞ and Gökçedağ WPP showing higher scores under the Current Trend and Pessimistic pathways than under the Optimistic pathway. This is directly relevant to the resilience of the Company's strategy because it indicates where land-use and habitat pressure around operating sites could intensify, informing the prioritisation of site-specific Biodiversity Action Plans, the application of the Anti-Deforestation Policy across operations and the supply chain, and the reforestation commitment to plant 1.2 million saplings. Source: WWF Water Risk Filter (methodology documentation, WWF); scenario definitions based on IPCC (2014) and O'Neill et al. (2017).

Water

(5.1.1.1) Scenario used

Water scenarios

☑ WWF Water Risk Filter

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Acute physical

☑ Chronic physical

☑ Policy

☑ Reputation

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2030

☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Changes to the state of nature

☑ Number of ecosystems impacted

☑ Changes in ecosystem services provision

☑ Speed of change (to state of nature and/or ecosystem services)

☑ Climate change (one of five drivers of nature change)

Stakeholder and customer demands

☑ Impact of nature footprint on reputation

☑ Sensitivity to inequity of nature impacts

Regulators, legal and policy regimes

☑ Global regulation

☑ Political impact of science (from galvanizing to paralyzing)

☑ Global targets

Direct interaction with climate

☑ On asset values, on the corporate

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Assumptions: the WWF Water Risk Filter assesses basin physical risk through 32 basin-specific indicators across four categories — water scarcity, flooding, water quality and ecosystem services status — projected under Current Trend, Optimistic and Pessimistic scenarios for 2030 and 2050. Water scarcity is calculated as a function of water demand relative to available supply in each basin. Flooding projections combine empirical evidence of large flood events from 1985 to the present with ensemble projections applying global climate and hydrological models to compute projected changes in flood frequency under a 2°C scenario. Water quality indicators are aligned with SDG 6.3.2 and comprise biochemical oxygen demand, electrical conductivity as a proxy for salinity and pH alteration, and nitrogen for nutrient loading. Ecosystem services status is informed by river fragmentation (Connectivity Status Index), catchment degradation through forest loss, and projected change in freshwater fish extinction. A separate basin regulatory risk layer, aligned with SDG 6.5.1, covers enabling environment, institutions and governance, management instruments, and infrastructure and finance. Uncertainties: basin-level projections may not capture site-specific hydrological conditions or local abstraction regimes; regional data quality and granularity vary; the interaction between physical and regulatory risk over long horizons is difficult to model. Constraints: the tool provides a macro-level basin assessment rather than site-specific hydrological modelling, and relies on historical and modelled data that may not fully reflect rapid local change. The assessment covers all operational sites of Zorlu Enerji Elektrik Üretim A.Ş. and its subsidiaries.

(5.1.1.11) Rationale for choice of scenario

Zorlu Enerji uses the WWF Water Risk Filter alongside the WRI Aqueduct Water Risk Atlas to obtain a more detailed and SDG-aligned view of basin risk, drawing on more recent mapping databases and a broader indicator set. The tool is applied within the scope of basin physical risk, cascading through water scarcity, flooding, water quality and ecosystem services status, and is complemented by a separate regulatory risk layer. This is directly relevant to the resilience of the Company's strategy because hydroelectric generation, which represents approximately 99% of the Company's water footprint, depends on basin inflows, while geothermal operations in the Aegean region depend on reservoir integrity and service water availability. The scenario analysis produced a material forward-looking finding for strategic planning: while no basin regulatory risks were identified for Zorlu Enerji sites under current conditions or baseline future projections, regulatory risk is expected to become critical by 2050 under the pessimistic scenario. This informs the Company's approach to withdrawal permitting, discharge compliance and

engagement on water governance, and supports the corporate target to reduce water use per unit of energy generated annually to 2030. Source: WWF Water Risk Filter (methodology documentation, WWF).

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☑ NGFS scenarios framework, please specify :NGFS Delayed Transition

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Policy

☑ Market

☑ Reputation

☑ Technology

☑ Acute physical

☑ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 1.6ºC - 1.9ºC

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025
☑ 2030
☑ 2040
☑ 2050
☑ Other, please specify :2026

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts
☑ Climate change (one of five drivers of nature change)

Finance and insurance
☑ Cost of capital
☑ Sensitivity of capital (to nature impacts and dependencies)

Regulators, legal and policy regimes
☑ Global regulation
☑ Political impact of science (from galvanizing to paralyzing)
☑ Level of action (from local to global)
☑ Global targets

Direct interaction with climate
☑ On asset values, on the corporate
☑ Perception of efficacy of climate regime

Macro and microeconomy

☑ Domestic growth

☑ Globalizing markets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Assumptions: emissions do not decline until 2030, after which very strong policy measures are introduced to keep warming below 2°C; carbon pricing rises from EUR 4/tCO_2e in 2026 to EUR 150/tCO_2e by 2040; policy action and market pricing mechanisms are postponed and subsequently accelerate rapidly; technology deployment is initially slow and then fast. Uncertainties: the timing and severity of the policy shift; the ability of supply chains to absorb an abrupt acceleration in demand for low-carbon equipment; the availability of financing under conditions of rapid repricing. Constraints: abrupt transitions are inherently difficult to model, and the interaction between delayed policy and market response introduces significant estimation uncertainty. The scenario covers all consolidated operations of Zorlu Enerji Elektrik Üretim A.Ş. and its subsidiaries.

(5.1.1.11) Rationale for choice of scenario

Zorlu Enerji uses the Delayed Transition scenario as a stress test for a "late and abrupt adjustment" environment, assessing the Company's level of preparedness for sharp increases in carbon costs, sudden regulatory tightening and rapid technological change. This scenario is critical for operational performance and investment timing. Within the analysis, risks such as supply chain disruption and pressure on financing are evaluated, while the strategic advantages and financing opportunities associated with being an early mover in renewable energy capacity and electrification solutions are also identified. The primary objective is to test the Company's financial and operational resilience during a highly volatile transition process. During the reporting period this scenario was also used to assess physical exposure, including an outage at the Kızıldere III Geothermal Power Plant caused by lightning-related weather conditions. Source: NGFS Climate Scenarios Phase IV; IIASA NGFS Database, REMIND model.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☑ NGFS scenarios framework, please specify :NGFS Fragmented World

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Policy

☑ Market

☑ Liability

☑ Reputation

☑ Technology

☑ Acute physical

☑ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 2.0ºC - 2.4ºC

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025

☑ 2030

☑ 2040

☑ 2050

☑ Other, please specify :2026

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Changes to the state of nature

☑ Changes in ecosystem services provision

☑ Climate change (one of five drivers of nature change)

Finance and insurance

☑ Cost of capital

Stakeholder and customer demands

☑ Impact of nature footprint on reputation

Regulators, legal and policy regimes

☑ Global regulation

☑ Political impact of science (from galvanizing to paralyzing)

☑ Level of action (from local to global)

Direct interaction with climate

☑ On asset values, on the corporate

☑ Perception of efficacy of climate regime

Macro and microeconomy

☑ Domestic growth

☑ Globalizing markets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Assumptions: countries achieve their net-zero commitments only partially and significant regional differences in climate policy persist; carbon pricing rises from EUR 8/tCO_2e in 2026 to EUR 120/tCO_2e by 2040; both physical and transition risks are elevated; climate policy is delayed and fragmented across jurisdictions. Uncertainties: the degree of regional policy alignment achievable; the stability of socio-political systems under increasing climate pressure; the exposure of internationally sourced equipment supply chains to fragmentation. Constraints: modelling the interaction between fragmented policy landscapes and localised physical impacts is complex, and the spatial resolution of local climate data limits asset-level precision. The scenario covers all consolidated operations of Zorlu Enerji Elektrik Üretim A.Ş. and its subsidiaries.

(5.1.1.11) Rationale for choice of scenario

Zorlu Enerji selected the Fragmented World scenario to reflect the complex operating environment created by geopolitical fragmentation, regulatory differences across markets and inconsistent climate policies. It provides a critical perspective for analysing strategic uncertainties arising from regional differences in the pace of transition, market volatility and inequalities in access to finance. Within this context the Company evaluates commercial risks related to energy security and regionalised supply chains, while also identifying opportunities associated with localised solutions such as distributed energy, grid resilience and digitalisation. Exposure of generation facilities and electricity distribution infrastructure to extreme weather events was assessed under this scenario, informing the Energy Storage Systems Project for centralised monitoring of storage systems. The primary objective is to preserve the resilience of the Company's climate strategy even where the global transition process is neither coordinated nor linear. Source: NGFS Climate Scenarios Phase IV; IIASA NGFS Database, REMIND model with MAGICC temperature outputs.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☑ NGFS scenarios framework, please specify :NGFS Current Policies

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Policy

☑ Market

☑ Liability

☑ Reputation

☑ Technology

☑ Acute physical

☑ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 2.5ºC - 2.9ºC

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025

☑ 2030

☑ 2040

☑ 2050

☑ Other, please specify :2026

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Changes to the state of nature

☑ Number of ecosystems impacted

☑ Changes in ecosystem services provision

☑ Speed of change (to state of nature and/or ecosystem services)

☑ Climate change (one of five drivers of nature change)

Relevant technology and science

☑ Granularity of available data (from aggregated to local)

Direct interaction with climate

☑ On asset values, on the corporate

☑ Perception of efficacy of climate regime

Macro and microeconomy

☑ Domestic growth

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Assumptions: only currently enacted policies remain in force, resulting in an expected global temperature increase of approximately 2.8–2.9°C by the end of the century; physical risks reach their highest levels while transition risks remain low. Under this scenario the analysis applies scenario-specific physical hazard indices (2025=100) covering heatwave severity in the OEDAŞ distribution region, extreme precipitation intensity, drought severity, expected annual flood damage and extreme wildfire risk, alongside a carbon price trajectory rising only from EUR 1/tCO_2e in 2026 to EUR 15/tCO_2e in 2040 and EUR 25/tCO_2e in 2050. Physical hazard indices escalate most steeply under this pathway, with wildfire risk showing the highest rate of increase, directly informing the assessment of generation losses at hydroelectric and geothermal plants and of SAIDI/SAIFI deterioration in the distribution network. Physical risk assessment covers lightning-related generation losses at wind plants, generation losses from extreme weather events at geothermal plants, generation losses arising from precipitation regime changes at hydroelectric plants, and changes in SAIDI and SAIFI performance metrics resulting from wildfires affecting distribution infrastructure. Uncertainties: the spatial resolution of local climate models and the variability of regional projections; the long-tail distribution of climate risks means low-frequency, high-consequence events carry significant estimation uncertainty. Constraints: more comprehensive studies are planned to enhance the spatial resolution of climate data and deepen asset-level analyses. The scenario covers all consolidated operations of Zorlu Enerji Elektrik Üretim A.Ş. and its subsidiaries.

(5.1.1.11) Rationale for choice of scenario

Zorlu Enerji uses the Current Policies scenario as a baseline case to assess its resilience against a future in which climate policies are insufficient to achieve global targets and physical impacts intensify. This scenario enables the systematic assessment of the impacts of acute and chronic climate hazards — including extreme weather events, heat stress and flooding — on operations, asset reliability and business continuity. Within this framework the Company analyses the strategic importance of adaptation planning and resilience investments, particularly for the protection of energy infrastructure, while also focusing on opportunity-driven investments such as system modernisation and efficiency improvements. Outputs informed the reinforcement of transmission lines, replacement of wooden poles, upgrading of transformer substations, undergrounding of distribution lines and deployment of backup generators. The ultimate objective is to ensure the reliability and sustainability of the Company's risk management and investment planning in a future characterised by elevated physical risks. Source: NGFS Climate Scenarios Phase IV; IIASA NGFS Database, REMIND model with MAGICC temperature outputs.

Water

(5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 2.6

(5.1.1.2) SSPs used in conjunction with scenario

Select from:

☑ SSP1

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Acute physical

☑ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 1.6°C - 1.9°C

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025

☑ 2030

☑ 2050
☑ 2060

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts
☑ Changes to the state of nature
☑ Number of ecosystems impacted
☑ Changes in ecosystem services provision
☑ Speed of change (to state of nature and/or ecosystem services)
☑ Climate change (one of five drivers of nature change)

Regulators, legal and policy regimes
☑ Global regulation
☑ Level of action (from local to global)
☑ Global targets

Relevant technology and science
☑ Granularity of available data (from aggregated to local)

Direct interaction with climate
☑ On asset values, on the corporate

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Assumptions: the optimistic pathway (SSP1-RCP2.6) assumes sustainable socioeconomic growth characterised by stringent environmental regulation and effective institutions, rapid technological change with improved water use efficiencies, and low population growth, limiting the rise in average global surface temperatures by 2100 to 1.3–2.4°C relative to pre-industrial levels. Basin-level water risk is projected using the WRI Aqueduct Water Risk Atlas (Aqueduct 4.0 database), with each projection year representing a long-term 30-year trend (2030: 2015–2045; 2050: 2035–2065; 2080: 2065–2095). Five global circulation models (GFDL-ESM4, IPSL-CM6A-LR, MPI-ESM1-2-HR, MRI-ESM2-0, UKESM1-0-LL) were run to account for climate model uncertainty, with the median of the five reported. Indicators assessed include baseline water stress, baseline water depletion, groundwater table decline, interannual and seasonal variability, riverine and coastal flood risk, and drought risk. Uncertainties: the quality, granularity and completeness of underlying basin data vary by region; local water risks can differ significantly from basin-level averages, and the tool may not capture site-specific nuances in areas with complex water governance. Constraints: the assessment provides a high-level, basin-scale

risk picture and does not substitute for site-specific hydrological studies; scenario data is based on historical and modelled trends and may not fully reflect rapid changes in local water availability or policy. The assessment covers all operational sites of Zorlu Enerji Elektrik Üretim A.Ş. and its subsidiaries.

(5.1.1.11) Rationale for choice of scenario

Zorlu Enerji selected the optimistic SSP1-RCP2.6 pathway as the lower bound of its water risk assessment, representing a future in which strong environmental governance and rapid improvements in water use efficiency moderate basin-level pressure. This scenario is directly relevant to the resilience of the Company's business strategy because water dependency is concentrated in hydroelectric generation, which accounts for approximately 99% of the Company's water footprint, and in geothermal operations located in the Aegean region. Assessing this pathway allows the Company to establish the minimum level of water risk it should plan for and to test whether its corporate target to reduce water use per unit of energy generated annually to 2030 remains sufficient under favourable conditions. The scenario is applied through the WRI Aqueduct Water Risk Atlas and complemented by the WWF Water Risk Filter, which projects how basin physical risk — covering water scarcity, flooding, water quality and ecosystem services status — evolves under current-trend, optimistic and pessimistic conditions to 2030 and 2050. Sources: WRI Aqueduct Water Risk Atlas (Aqueduct 4.0); WWF Water Risk Filter.

Water

(5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 7.0

(5.1.1.2) SSPs used in conjunction with scenario

Select from:

☑ SSP3

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Acute physical

☑ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 3.5ºC - 3.9ºC

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025

☑ 2030

☑ 2050

☑ 2080

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Changes to the state of nature

☑ Number of ecosystems impacted

☑ Changes in ecosystem services provision

☑ Speed of change (to state of nature and/or ecosystem services)

☑ Climate change (one of five drivers of nature change)

Regulators, legal and policy regimes

☑ Global regulation

☑ Level of action (from local to global)

☑ Global targets

Relevant technology and science

☑ Granularity of available data (from aggregated to local)

Direct interaction with climate

☑ On asset values, on the corporate

Macro and microeconomy

☑ Domestic growth

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Assumptions: the business-as-usual pathway (SSP3-RCP7.0) assumes a middle-of-the-road future characterised by regional competition and inequality, slow economic growth, weak governance and institutions, low investment in environment and technology, and high population growth, with temperatures increasing by 2.8–4.6°C by 2100. Basin-level water risk is projected using the WRI Aqueduct Water Risk Atlas (Aqueduct 4.0), with each projection year representing a long-term 30-year trend (2030: 2015–2045; 2050: 2035–2065; 2080: 2065–2095), based on the median of five global circulation models. Under this pathway, competition for water among domestic, industrial, irrigation and livestock users is assumed to intensify, increasing baseline water stress and depletion in already-pressured basins. Uncertainties: the degree of regional policy divergence achievable; the interaction between weak water governance and increasing demand; the reliability of long-term projections at basin scale. Constraints: the assessment is basin-scale rather than site-specific and does not fully capture local abstraction licensing regimes or upstream user behaviour; regional data quality varies. The assessment covers all operational sites of Zorlu Enerji Elektrik Üretim A.Ş. and its subsidiaries.

(5.1.1.11) Rationale for choice of scenario

Zorlu Enerji uses the SSP3-RCP7.0 pathway as its central case for water risk planning, reflecting a plausible future in which climate and water governance progress unevenly and basin-level competition intensifies. This scenario is critical to the resilience of the Company's strategy because a significant proportion of generation assets are located in the Aegean, Mediterranean, Central Anatolian and Eastern Anatolian basins, several of which are already classified as high water risk. Testing this pathway allows the Company to identify where hydrological variability could constrain hydroelectric output, where geothermal operations may face increased competition for service water, and where regulatory tightening on withdrawal or discharge could affect operating conditions. The findings inform the prioritisation of water efficiency measures including reinjection of spent geothermal fluid, closed-loop systems, reverse osmosis capacity and AI-supported optimisation of reservoir management. Sources: WRI Aqueduct Water Risk Atlas (Aqueduct 4.0); WWF Water Risk Filter.

Water

(5.1.1.1) Scenario used

Physical climate scenarios
☑ RCP 8.5

(5.1.1.2) SSPs used in conjunction with scenario

Select from:
☑ SSP5

(5.1.1.3) Approach to scenario

Select from:
☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:
☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply
☑ Acute physical
☑ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:
☑ 4.0°C and above

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2030

☑ 2050

☑ 2080

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Changes to the state of nature

☑ Number of ecosystems impacted

☑ Changes in ecosystem services provision

☑ Speed of change (to state of nature and/or ecosystem services)

☑ Climate change (one of five drivers of nature change)

Stakeholder and customer demands

☑ Impact of nature footprint on reputation

Direct interaction with climate

☑ On asset values, on the corporate

☑ Perception of efficacy of climate regime

Macro and microeconomy

☑ Domestic growth

☑ Globalizing markets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Assumptions: the pessimistic pathway (SSP5-RCP8.5) assumes fossil-fuelled development with rapid economic growth and globalisation powered by carbon-intensive energy, strong institutions with high investment in education and technology but a lack of global environmental concern, and temperatures increasing by 3.3–5.7°C by 2100. Basin-level water risk is projected using the WRI Aqueduct Water Risk Atlas (Aqueduct 4.0) across 2030, 2050 and 2080, each representing a 30-year long-term trend, based on the median of five global circulation models. Under this pathway, drought frequency and severity, interannual and seasonal supply variability, and riverine flood risk are all assumed to increase materially, with corresponding deterioration in water quality indicators. Uncertainties: the magnitude of physical water impacts and their cascading socioeconomic consequences; the potential for disruptive technological or policy shifts not captured in the pathway; the reliability of extreme-tail projections. Constraints: modelling extreme physical impacts and their feedback effects on basins and communities carries high estimation uncertainty; the basin-scale resolution limits asset-level precision. The assessment covers all operational sites of Zorlu Enerji Elektrik Üretim A.Ş. and its subsidiaries.

(5.1.1.11) Rationale for choice of scenario

Zorlu Enerji applies the SSP5-RCP8.5 pathway as a worst-case stress test to evaluate the upper bound of water-related operational and financial risk. This scenario is directly relevant to strategic resilience because hydroelectric generation depends on precipitation and reservoir inflows, and geothermal operations depend on reservoir integrity and service water availability; a sustained deterioration in basin conditions would translate into reduced generation output and revenue. Assessing this pathway allows the Company to understand how severe drought, heightened hydrological variability and flood-driven disruption could affect generation continuity and asset valuation, and to determine the adaptation measures required to preserve operational resilience. It also informs the prioritisation of investment in water efficiency and reservoir optimisation, and supports the Company's commitment to becoming a Net Positive Impact company by 2035 by identifying basins where water stress could compound ecosystem pressure. Sources: WRI Aqueduct Water Risk Atlas (Aqueduct 4.0); WWF Water Risk Filter.

Forests

(5.1.1.1) Scenario used

Climate transition scenarios

☑ NGFS scenarios framework, please specify :NGFS Current Policies

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Acute physical

☑ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 2.5ºC - 2.9ºC

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025

☑ 2030

☑ 2040

☑ 2050

☑ Other, please specify :2026

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Changes to the state of nature

☑ Number of ecosystems impacted

☑ Changes in ecosystem services provision

☑ Speed of change (to state of nature and/or ecosystem services)

☑ Climate change (one of five drivers of nature change)

Relevant technology and science

☑ Granularity of available data (from aggregated to local)

Direct interaction with climate

☑ On asset values, on the corporate

Macro and microeconomy

☑ Domestic growth

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Assumptions: only currently enacted policies remain in force, resulting in an expected global temperature increase of approximately 2.8°C by the end of the century, with physical risks reaching their highest levels while transition risks remain low. The analysis applies scenario-specific physical hazard indices (2025=100) covering extreme wildfire risk, heatwave severity in the OEDAŞ distribution region, drought severity, extreme precipitation intensity and expected annual flood damage. Under this pathway, extreme wildfire risk shows the steepest rate of increase of all physical hazard indices, with material implications for the forested landscapes in which transmission and distribution assets are located, particularly in the OEDAŞ distribution region covering Afyonkarahisar, Bilecik, Eskişehir, Kütahya and Uşak. Uncertainties: the spatial resolution of local climate models and the variability of regional projections; the long-tail distribution of climate risks means low-frequency, high-consequence wildfire events carry significant estimation uncertainty; the relationship between hazard indices and actual forest loss depends on local vegetation management and fire suppression capacity. Constraints: the analysis projects hazard exposure rather than modelling forest cover change directly; more comprehensive studies are planned to enhance the spatial resolution of climate data and deepen asset-level analyses. The assessment covers all consolidated operations of Zorlu Enerji Elektrik Üretim A.Ş. and its subsidiaries.

(5.1.1.11) Rationale for choice of scenario

Zorlu Enerji uses the NGFS Current Policies scenario as a worst-case physical stress test, and applies it to forests because wildfire is the principal mechanism through which climate change translates into forest loss and habitat degradation in the landscapes where the Company operates. Several generation facilities are located in or adjacent to forested and fire-prone landscapes in the Aegean and Mediterranean regions, and the OEDAŞ distribution network includes overhead lines, poles, insulators and substations located within or adjacent to forest corridors. Assessing this scenario allows the Company to understand how escalating wildfire risk could simultaneously damage its own assets and the surrounding forest ecosystems it is committed to protecting under its Anti-Deforestation Policy. The findings inform preventive vegetation management including tree felling, pruning and clearance of cut residues within forest corridors, risk-based preventive maintenance focused on wildfire hotspots, selective redesign of lines traversing forested areas, targeted undergrounding in forest crossing sections, and the Aerogel Fire Shield Project. These measures are designed to reduce ignition probability and limit the extent of forest damage arising from network-related incidents. Source: NGFS Climate Scenarios for Central Banks and Supervisors, Phase IV; IIASA NGFS Climate Scenarios Database.
[Add row]

(5.1.2) Provide details of the outcomes of your organization’s scenario analysis.

Climate change

(5.1.2.1) Business processes influenced by your analysis of the reported scenarios

Select all that apply

☑ Risk and opportunities identification, assessment and management

☑ Strategy and financial planning

☑ Resilience of business model and strategy

☑ Capacity building

☑ Target setting and transition planning

(5.1.2.2) Coverage of analysis

Select from:

☑ Organization-wide

(5.1.2.3) Summarize the influence of the scenario analysis on the selected business processes

Scenario analysis using the NGFS Phase IV framework — Net Zero 2050 (1.3°C), Delayed Transition (1.6°C), Fragmented World (2.3°C) and Current Policies (2.8°C) — across 2026, 2030, 2040 and 2050 horizons has influenced five business processes organization-wide. Risk and opportunity identification, assessment and management: Scenario outputs feed directly into the enterprise risk management system, where climate risks are assessed against a financial materiality threshold of 2.1% of revenue. Sixteen scenario-specific driver trajectories — including carbon price, clean electricity share, electrification rate, EV penetration, distributed energy resource growth, cost of capital, and physical hazard indices for heatwave, drought, flood and wildfire — are used to score risk probability and magnitude by maturity. All identified climate risks were assessed as remaining below the materiality threshold in the reporting year, with the exception of distributed energy resource impacts on retail sales, which reach 2.1–4.99% of revenue in the long term under the analysis. Strategy and financial planning: Carbon price trajectories differentiated by scenario (rising to EUR 254.9/tCO_2e by 2040 and EUR 442.1/tCO_2e by 2050 under Net Zero, against EUR 15/tCO_2e and EUR 25/tCO_2e under Current Policies) inform investment feasibility analysis and the internal carbon price, which was established in the range of USD 70–110 per tonne and integrated into operational planning, investment appraisal and financial modelling. Financing cost sensitivity is modelled through a greenium/WACC driver reflecting the Company's sustainability-linked bond structure. Resilience of business model and strategy: The analysis indicates that the current strategy and business model are generally resilient under the selected scenarios. The Company's decision to exit emission-intensive thermal electricity generation by 2027 and structure its portfolio around renewable generation reduces exposure to transition risk under orderly and disorderly pathways. Under high physical risk pathways, additional adaptation measures become increasingly important for specific assets, particularly hydroelectric plants exposed to precipitation regime change and distribution infrastructure exposed to wildfire. As of the reporting period no asset relocation or decommissioning has been required. Regarding stranded asset exposure, the Company holds no new fossil fuel reserves or generation expansion; the remaining thermal exposure is being actively divested, and future capital expenditure is directed to renewable capacity,

storage and grid modernisation, which reduces the probability of stranded asset risk to low across all scenarios examined. Capacity building: Findings are communicated through the Sustainability Committee to the Board of Directors and cascaded through the three thematic working groups and Zorlu Akademi training programmes, building internal capability on scenario-based risk assessment, MRV readiness and transition planning. Target setting and transition planning: Scenario outputs underpin the SBTi-validated 2030 interim and 2040 Net Zero targets and the decarbonization strategy, including modelling commissioned by the Sustainability Committee to determine how specific planned investments affect target achievement. Energy outlook assumptions — clean electricity share, electrification and demand growth — were used to test the flexibility of the business model to significant changes in demand, including the erosion of grid-supplied retail volumes as distributed generation expands, which prompted the establishment of Zorlu Dengeleme Enerji Yönetimi A.Ş. and the acquisition of a 20-year aggregation licence. Quantified outcomes: Carbon cost exposure for geothermal Scope 1 emissions under the Turkish ETS was modelled at TRY 1.07 billion (Current Policies) to TRY 17.79 billion (Net Zero) cumulatively across 2031–2040, equal to 0.10–1.63% of forecast consolidated revenue and below the 2.1% threshold in every pathway. Wildfire-driven outage, restoration and service quality costs across the OEDAŞ distribution network were modelled at TRY 93.6 million (Net Zero) to TRY 517.4 million (Current Policies) over the same period, equal to 0.01–0.05%, with exposure highest where transition action is weakest. Erosion of OEPSAŞ retail revenue by distributed energy resources was modelled at TRY 10.24 billion (Current Policies) to TRY 28.43 billion (Net Zero), equal to 0.94–2.61%; the only modelled outcome exceeding the threshold, and only in the long term under Net Zero. These outcomes are stated before mitigation and are compared against forecast consolidated revenue of TRY 1,090,242,134,898 for 2031–2040. Response costs are TRY 62,790,800 for geothermal emission reduction (GECO, JESKE, ESP), TRY 467,540,000 for wildfire prevention on the OEDAŞ network, and TRY 19,766,000 for aggregation capability.

Forests

(5.1.2.1) Business processes influenced by your analysis of the reported scenarios

Select all that apply

☑ Risk and opportunities identification, assessment and management

☑ Strategy and financial planning

☑ Resilience of business model and strategy

☑ Capacity building

☑ Target setting and transition planning

(5.1.2.2) Coverage of analysis

Select from:

☑ Organization-wide

(5.1.2.3) Summarize the influence of the scenario analysis on the selected business processes

Scenario analysis applying the NGFS Current Policies pathway (2.8°C) and WWF Water Risk Filter basin projections for 2030 and 2050 has influenced business processes relating to land use and forests organization-wide. Risk and opportunity identification, assessment and management: Extreme wildfire risk shows the

steepest rate of increase of all physical hazard indices under the Current Policies pathway, with material implications for forested landscapes in the OEDAŞ distribution region. Basin biodiversity importance scores remain broadly stable to 2030 but diverge between scenarios by 2050, with Alaşehir GPP, Uşak OEDAŞ and Gökçedağ WPP showing higher scores under current-trend and pessimistic pathways. Strategy and financial planning: Findings inform investment in preventive vegetation management, selective redesign of lines traversing forested areas, targeted undergrounding in forest crossing sections, and the Aerogel Fire Shield Project (budget TRY 5,277,000). Resilience of business model and strategy: Forests exposure arises from land use in siting and operating generation and grid assets rather than from forest-risk commodity production. Resilience depends on preventing ignition and limiting land-use change; site-specific Biodiversity Action Plans and early-stage habitat screening using IBAT and the WWF Biodiversity Risk Filter are the primary mechanisms. Capacity building: Findings are reported through the Regenerate working group to the Sustainability Committee, and workforce capability is strengthened through practical training programmes and drills incorporating firefighting and search-and-rescue competencies. Target setting and transition planning: Outputs support the Anti-Deforestation Policy approved by the Sustainability Committee, the commitment to no gross deforestation by 2030, the reforestation target of 1.2 million saplings, and the Net Positive Impact by 2035 commitment.

Water

(5.1.2.1) Business processes influenced by your analysis of the reported scenarios

Select all that apply

☑ Risk and opportunities identification, assessment and management

☑ Strategy and financial planning

☑ Resilience of business model and strategy

☑ Capacity building

☑ Target setting and transition planning

(5.1.2.2) Coverage of analysis

Select from:

☑ Organization-wide

(5.1.2.3) Summarize the influence of the scenario analysis on the selected business processes

Scenario analysis using WRI Aqueduct Water Risk Atlas pathways (SSP1-RCP2.6, SSP3-RCP7.0, SSP5-RCP8.5) across 2030, 2050 and 2080, complemented by WWF Water Risk Filter basin risk projections for 2030 and 2050 under optimistic, current-trend and pessimistic scenarios, has influenced five business processes organization-wide. Risk and opportunity identification, assessment and management: Basin-level projections are integrated into the enterprise risk management system and used to prioritise sites by water stress, depletion, drought risk, flood risk and water quality deterioration. A material forward-looking finding was that while no basin regulatory risks were identified under current conditions or baseline projections, regulatory risk is expected to become critical by 2050 under the pessimistic pathway, indicating a need to prepare for tighter withdrawal permitting and discharge requirements. Strategy and financial planning: Findings inform capital and operational expenditure decisions on water efficiency infrastructure, including reinjection capacity at geothermal fields, closed-loop systems at Alaşehir GPP, reverse

osmosis capacity at the Kızıldere plants enabling service water to be met from treated geothermal-origin water, and turbine–generator renewals that increase generation per unit of water. Resilience of business model and strategy: Because hydroelectric generation represents approximately 99% of the Company's water footprint, basin inflow variability is the principal determinant of water-related resilience. Under pessimistic pathways, increased drought severity and interannual variability would reduce hydroelectric output and revenue predictability. The diversified generation portfolio across geothermal, wind, solar and hydro, and the non-consumptive nature of hydroelectric water use, moderate this exposure. AI-supported forecasting of precipitation and hydrological parameters is being deployed to optimise reservoir water retention. Capacity building: Basin risk findings are shared through the Regenerate working group and reported to the Sustainability Committee, building internal understanding of catchment-level dependency among operational teams. Target setting and transition planning: Outputs inform the corporate target to reduce water use per unit of energy generated annually to 2030, and the benchmarking study of water use at geothermal power plants commissioned by the Sustainability Committee during the reporting year.
[Fixed row]

(5.2) Does your organization’s strategy include a climate transition plan?

(5.2.1) Transition plan

Select from:
☑ Yes, we have a climate transition plan which aligns with a 1.5°C world

(5.2.3) Publicly available climate transition plan

Select from:
☑ Yes

(5.2.4) Plan explicitly commits to cease all spending on, and revenue generation from, activities that contribute to fossil fuel expansion

Select from:
☑ Yes

(5.2.5) Description of activities included in commitment and implementation of commitment

Zorlu Enerji Climate Transition Plan - activities for achieving net zero by 2040. Renewable expansion: increase geothermal, wind, hydro and solar capacity in the generation portfolio, with a commitment to become a 100% renewable company by 2030 and to invest exclusively in renewable sources in new investments. Exit from

thermal: exit carbon-intensive thermal investments by 2027. The termination of operations in Israel and the exit from the gas distribution business form part of this process. Energy efficiency: measures across all operations under ISO 50001, targeting a 10% annual reduction in energy consumption. Carbon capture and reinjection: the GECO programme at Kizildere develops non-condensable gas treatment and CO2 reinjection technologies to reduce geothermal Scope 1 emissions at pilot scale. Electrification: complete electrification of the vehicle fleet, commenced in 2024. Grid decarbonisation: OEDAS investment in SF6 reduction solutions, rooftop solar and infrastructure improvements that lower grid carbon intensity. Sustainable supply chain: prioritise low-carbon suppliers; align all critical and strategic suppliers with ESG standards by 2030 and all suppliers by 2035; optimise logistics through route optimisation and modal shift. Research and development: energy storage, green hydrogen and geothermal emission control, with an R&D and innovation budget of TL 154,448,717 in the reporting period. Monitoring and reporting: emissions and progress against SBTi-validated targets tracked with independent third-party verification and disclosed through the Integrated Annual Report, the TSRS-compliant Sustainability Report and CDP. Biodiversity: habitat protection and restoration integrated into project development, supporting the Net Positive Impact by 2035 commitment. Resilience: adaptation strategies to withstand physical climate impacts and maintain operational continuity. These activities are significant to the Company. Thermal exit and renewable expansion together reshape the generation portfolio and the emissions trajectory that underpins our SBTi targets; the remaining fossil exposure is limited to the Luleburgaz cogeneration facility, which produces steam for industrial supply, and no new fossil fuel capacity is planned or financed.

(5.2.10) Mechanism by which feedback is collected from shareholders on your climate transition plan

Select from:

☑ Our climate transition plan is voted on at AGMs and we also have an additional feedback mechanism in place

(5.2.11) Description of feedback mechanism

Zorlu Enerji's climate transition plan is set out within its TSRS-compliant Sustainability Report, prepared under Türkiye Sustainability Reporting Standards 1 and 2 and subject to limited assurance by KPMG. A summary of the report, which includes the climate transition plan, is presented at the Annual General Meeting and shareholders vote on its approval. The transition plan is therefore subject to annual shareholder approval as an integral component of the report, rather than as a separate standing agenda item. In addition to the AGM, feedback is collected through the Company's investor relations function, which conducts one-on-one meetings and investor presentations with institutional shareholders in which climate transition and decarbonisation performance are discussed, and through the stakeholder consultation carried out as part of the double materiality assessment, in which shareholders and investors are among the stakeholder groups consulted. Feedback channels are also published on the corporate website. Input received through these channels is reported to the Sustainability Committee, which meets four times a year and reports to the Board of Directors, ensuring that shareholder perspectives inform the ongoing development of the transition plan. The Integrated Annual Report is the principal instrument through which progress against the plan is communicated.

(5.2.12) Frequency of feedback collection

Select from:

☑ Annually

(5.2.13) Description of key assumptions and dependencies on which the transition plan relies

The transition plan rests on the following key assumptions. Carbon pricing: carbon pricing is implemented in Türkiye from 2027, rising from EUR 11.6/tCO2e in 2027 to EUR 254.9/tCO2e by 2040 under the Net Zero scenario, with differentiated trajectories across the four scenarios modelled. Regulatory developments: the Climate Law, in force from 2025, and the Emissions Trading System, expected on a pilot basis in 2026, progressively align with the EU ETS. Policy alignment: full alignment with the European Green Deal, the Carbon Border Adjustment Mechanism and energy transition policies. Investment environment: financing, technology and infrastructure conditions required for renewable investment remain accessible. Supply chain: availability of lower-carbon products and services increases over time, supporting Scope 3 reductions. Dependencies include stable regulatory frameworks and predictable licensing; access to green and sustainability-linked finance; supplier and partner cooperation on decarbonisation; and timely commercial availability of clean technologies including storage and geothermal emission control. Resourcing: the plan is funded through the capital expenditure programme, with renewable investment by Zorlu Yenilenebilir Enerji A.Ş. and its subsidiaries of TL 1,239,228,000 in the reporting period and an R&D budget of TL 154,448,717. Sustainability-linked instruments form part of the funding mix; the existing sustainability-linked bond carries four climate KPIs assessed as at 31 December 2026 with a coupon step-up mechanism. Delivery is managed on a programme basis so that individual project delays do not interrupt the overall trajectory.

(5.2.14) Description of progress against transition plan disclosed in current or previous reporting period

Progress in the reporting year includes: total emissions reduced from 3,443,899 tCO_2e in 2024 to 2,432,139 tCO_2e in 2025; market-based Scope 2 emissions reduced from 252,576 tCO_2e to 159,348 tCO_2e; Scope 1 and Scope 3 emissions intensity from fuel- and energy-related activities reduced from 0.45 to 0.26 tCO_2e/MWh; and Scope 3 emissions reduced from 2,476,938 tCO_2e to 1,563,451 tCO_2e, including a significant reduction in Category 15 following the exit from investments in Israel. On Phase One (reduction of operational emissions): the exit from thermal operations progressed through the divestment of Israeli natural gas assets and the gas distribution business; the GECO programme at Kızıldere Geothermal Power Plant continued development of non-condensable gas treatment and CO_2 reinjection at pilot scale, with contract negotiations for JESKE ongoing; Electric Submersible Pump technology and modernisation projects were implemented to improve field efficiency and reduce emissions intensity per MWh; GeoSmart pilot applications were conducted for thermal storage integration and reinjection temperature optimisation; and 6 MWp of the 72 MW solar portfolio for internal consumption was completed. On Phase Two (value chain emissions): supplier ESG alignment targets were maintained, with all critical and strategic suppliers to be aligned by 2030. Emissions intensity from electricity generation was 0.270 tCO_2e/MWh against 0.264 in 2024, reflecting changes in portfolio composition and generation mix; this indicator is monitored through a three-year trend analysis. A 20-year aggregation licence was obtained through the establishment of Zorlu Dengeleme Enerji Yönetimi A.Ş., positioning the Company for the decentralisation of the power system.

(5.2.15) Attach any relevant documents which detail your climate transition plan (optional)

Zorlu Enerji TSRS Report 2025.pdf,Zorlu Enerji Integrated Annual Report 2025.pdf

(5.2.16) Other environmental issues that your climate transition plan considers

Select all that apply

☑ Forests

☑ Water

☑ Biodiversity

(5.2.17) Explain how the other environmental issues are considered in your climate transition plan

Water: The transition plan recognises that decarbonisation and water management are interdependent, particularly for hydroelectric generation, which represents approximately 99% of the Company's water footprint, and for geothermal operations. Actions include reinjection of spent geothermal fluid to maintain reservoir balance, closed-loop systems at Alaşehir GPP, reverse osmosis capacity at the Kızıldere plants enabling service water needs to be met from treated geothermal-origin water, and AI-supported forecasting of precipitation and hydrological parameters to optimise reservoir management and increase generation efficiency per unit of water. These are linked to the corporate target to reduce water use per unit of energy generated annually to 2030. Biodiversity: Site-level biodiversity screening using IBAT and the WWF Biodiversity Risk Filter is applied at project siting stage, and site-specific Biodiversity Action Plans are implemented under the Biodiversity and Ecosystem Management System, structured in line with IFC Performance Standard 6. The Company commits to becoming a Net Positive Impact company by 2035, moving beyond impact mitigation to active ecosystem enhancement. Species monitoring covers Endangered and Vulnerable species identified at operational sites. Forests: The Anti-Deforestation Policy, approved by the Sustainability Committee, commits the Company to ensuring that its activities, both directly and throughout its supply chain, do not contribute to deforestation, and to no gross deforestation by 2030 across operating sites. The Zero Carbon Footprint Forests Project targets 1.2 million saplings, with 90,000 saplings donated to the Ministry of National Education during the reporting year. Reforestation supports carbon sequestration alongside habitat protection, linking directly to the decarbonisation objectives of the transition plan.

(5.2.18) Adaptation-specific objectives included within your climate transition plan

Select from:

☑ Yes

(5.2.19) Describe the adaptation objectives included in your climate transition plan or standalone adaptation plan

Adaptation objectives within the transition plan address the physical climate risks identified through NGFS Phase IV scenario analysis, particularly under the Current Policies pathway where physical hazard indices escalate most steeply. Objectives include: End-to-end monitoring and early warning: enterprise-level monitoring of physical hazards through meteorological and hydrological indicators tracked against predefined thresholds, with crisis and emergency response plans maintained up to date. Physical protection and site resilience engineering: flood barriers and reinforcement measures at exposed locations, and relocation of critical infrastructure to higher elevations where necessary. Regional risk mapping and asset-level vulnerability analytics: use of regional risk maps and geospatial tools to identify hotspots, with findings translated into investment planning. Financial risk transfer: Probable Maximum Loss assessments and continuous optimisation of insurance coverage for climate-related events affecting critical assets. Operational preparedness and restoration capability: defined incident response guidelines, clear accountability structures and digital infrastructure investment to reduce outage durations. Network-specific measures include reinforcement of transmission lines, replacement of wooden poles, upgrading of transformer substations, undergrounding of distribution lines, deployment of backup generators, vegetation management in forest corridors and the Aerogel Fire Shield Project. Generation-specific measures include collaboration with wind turbine manufacturers on climate-adapted equipment design, turbine orientation optimisation in response to changing wind regimes, and active cooling systems at solar facilities to address temperature stress. These objectives are integrated into the enterprise risk management framework and support operational continuity and asset reliability.
[Fixed row]

(5.3) Have environmental risks and opportunities affected your strategy and/or financial planning?

(5.3.1) Environmental risks and/or opportunities have affected your strategy and/or financial planning

Select from:

☑ Yes, both strategy and financial planning

(5.3.2) Business areas where environmental risks and/or opportunities have affected your strategy

Select all that apply

☑ Products and services

☑ Upstream/downstream value chain

☑ Investment in R&D

☑ Operations

[Fixed row]

(5.3.1) Describe where and how environmental risks and opportunities have affected your strategy.

Products and services

(5.3.1.1) Effect type

Select all that apply

☑ Transition risks

☑ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☑ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Climate-related transition risks and opportunities have reshaped Zorlu Enerji's product and service portfolio over the short to long term. The identified downstream market risk arising from the proliferation of distributed energy resources — rooftop solar, behind-the-meter storage and off-grid solutions — is expected to erode

OEPSAŞ's retail electricity sales volumes, reaching 2.1–4.99% of revenue in the long term (2031–2040) under scenario analysis. Rather than accepting volume loss, the Company placed the introduction of an aggregation licence on its strategic agenda and established Zorlu Dengeleme Enerji Yönetimi A.Ş., obtaining a 20-year aggregation licence to reposition the retail business towards flexibility services and distributed energy aggregation. In parallel, the Company has expanded low-carbon products and services including the ZES electric vehicle charging network, rooftop solar installation and sales, EV leasing through Eway, and I-REC/YEK-G certified green electricity offerings, converting a demand-side transition risk into new revenue streams. These decisions were taken to protect revenue predictability and to maintain long-term relevance in a decentralising power system.

Upstream/downstream value chain

(5.3.1.1) Effect type

Select all that apply

☑ Physical risks

☑ Transition risks

☑ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☑ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Supply chain and cost inflation was identified as a substantive short-term risk, with 2025 procurement data showing cost increases of 38% in maintenance and repair services, 42% in logistics and leased vehicle utilisation and approximately 28% in fuel costs compared with 2024. Concentration risk is heightened because high-technology equipment specific to renewable energy — geothermal fluid management systems, utility-scale wind turbines, regulatory-mandated battery storage systems and grid connection equipment — is supplied by a limited number of manufacturers. In response, the Company strengthened centralised procurement, expanded long-term price-fixing mechanisms, implemented contract-based cost controls for critical items, and set objectives to obtain bids from a minimum of three companies in tender processes and limit deviation from the annual procurement budget to 3–5%. Environmental criteria have been integrated into supplier selection, prioritising suppliers with low-carbon production processes and demonstrated energy efficiency, with targets to align all critical and strategic suppliers with ESG standards by 2030 and all suppliers by 2035. Forests-related risk in the upstream value chain — the embedded land-use footprint of equipment manufacturing and tightening regulation such as the EU Deforestation Regulation — is addressed through the Anti-Deforestation Policy, which commits to ensuring that activities throughout the supply chain do not contribute to deforestation and to managing deforestation-related supply chain risks by 2030. Water-related upstream exposure arises where critical equipment suppliers operate water-intensive manufacturing processes in regions classified as high water risk; this is managed through the same supplier ESG alignment programme. Downstream, logistics optimisation through route optimisation and modal shifts to Ro-Ro and rail transport has been implemented to reduce Scope 3 emissions.

Investment in R&D

(5.3.1.1) Effect type

Select all that apply

☑ Physical risks

☑ Transition risks

☑ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☑ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Climate-related risks and opportunities have directed the Company's research and development priorities, with an R&D and innovation budget of TL 154,448,717 in the reporting period. Regulatory transition risk relating to future carbon cost exposure under the Turkish Emissions Trading System, specific to geothermal non-condensable gas emissions, prompted the GECO programme at Kızıldere to develop NCG treatment and CO_2 reinjection technologies, with contract negotiations for JESKE ongoing. Performance optimisation work including Electric Submersible Pump technology and GeoSmart pilot applications for thermal storage integration and reinjection temperature optimisation was developed to reduce emissions intensity per MWh. Physical risk findings drove R&D directed at climate adaptation, including the Aerogel Fire Shield Project at OEDAŞ (budget TRY 5,277,000) addressing wildfire-related outage risk, the Spatial Load Forecasting tool, next-generation grid development and solutions to prevent long-duration outages caused by ice loading. Water-related risk informed investment in AI-supported forecasting of precipitation and hydrological parameters to optimise reservoir water retention at hydroelectric plants and increase generation efficiency per unit of water. Regulatory restrictions on SF_6 prompted evaluation of SF_6-free and low-GWP alternative technologies for distribution switchgear.

Operations

(5.3.1.1) Effect type

Select all that apply

☑ Physical risks

☑ Transition risks

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☑ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

The most substantial operational decision affected by climate-related transition risk is the exit from carbon-intensive thermal operations by 2027, including the divestment of Israeli natural gas assets at Ashdod and Ramat Negev to Edeltech Ltd. and the exit from the gas distribution business. This decision reallocates capital to renewable generation, storage and grid modernisation, with renewable energy investments by Zorlu Yenilenebilir Enerji A.Ş. and its subsidiaries amounting to TL 1,239,228,000 in the reporting period. Regulatory uncertainty in the Turkish energy market prioritised capital allocation towards projects with shorter payback periods based on existing licensing infrastructure, including in-field optimisation and equipment renewal to increase output from existing geothermal plants, and hybrid solar integration under existing geothermal licences at Kızıldere 2 and Kızıldere 3, which increases generation capacity while avoiding new licensing uncertainty. Physical risks are concentrated geographically: hydroelectric plants in the Black Sea, Central Anatolia and Northeastern Anatolia regions are exposed to precipitation regime change; geothermal facilities in Denizli and Manisa to extreme weather; and the OEDAŞ distribution region (Eskişehir, Kütahya, Afyonkarahisar, Bilecik, Uşak) to wildfire, with SAIDI and SAIFI performance directly affected. Adaptation measures implemented include flood barriers and reinforcement at exposed locations, relocation of critical infrastructure to higher elevations where necessary, vegetation management in forest corridors, undergrounding of distribution lines in forest crossing sections, and turbine orientation optimisation in response to changing wind regimes. Water-related operational decisions include reinjection of spent geothermal fluid, closed-loop systems at Alaşehir GPP and reverse osmosis capacity at the Kızıldere plants. As of the reporting period no asset relocation or decommissioning has been required as a result of physical climate risk.
[Add row]

(5.3.2) Describe where and how environmental risks and opportunities have affected your financial planning.

Row 1

(5.3.2.1) Financial planning elements that have been affected

Select all that apply

☑ Revenues

(5.3.2.2) Effect type

Select all that apply

☑ Physical risks

☑ Transition risks

☑ Opportunities

(5.3.2.3) Environmental issues relevant to the risks and/or opportunities that have affected these financial planning elements

Select all that apply

☑ Climate change

(5.3.2.4) Describe how environmental risks and/or opportunities have affected these financial planning elements

Revenue planning is directly affected by both transition and physical climate risks, and by water-related physical risk, across short, medium and long-term horizons. Transition risk case study — distributed energy resources: Scenario analysis identified that the increasing adoption of rooftop solar, behind-the-meter storage and off-grid solutions will reduce electricity volumes supplied through the grid and erode OEPSAŞ's retail sales. The financial effect was assessed as below the 2.1% materiality threshold in the short and medium term but reaching 2.1–4.99% of revenue in the long term (2031–2040). Revenue forecasting for the retail business now incorporates declining billed volumes, higher customer churn and margin compression, and the Company obtained a 20-year aggregation licence through Zorlu Dengeleme Enerji Yönetimi A.Ş. to establish alternative revenue streams from flexibility services. Market price risk: Uncertainty in the Turkish energy market was quantified through Market Clearing Price analysis: generation volume sold outside the Renewable Energy Resources Support Mechanism in 2025 was multiplied by average MCP for 2024 (68.1 USD/MWh), 2025 (66.4 USD/MWh) and the 2026 forecast (65.1 USD/MWh), holding volume constant. The current financial impact was calculated as TL 39,682,532, with an anticipated short-term impact of TL 30,760,776. Physical and water-related risk: Extreme precipitation events affecting water intake systems at hydroelectric assets, and changes in precipitation regimes affecting reservoir inflows, translate into lost generation and reduced delivery volumes. Because hydroelectric generation represents approximately 99% of the Company's water footprint, basin-level water availability is a direct input into revenue projections. Revenue volatility is also increased where lost output cannot be recovered within the same period.

Row 2

(5.3.2.1) Financial planning elements that have been affected

Select all that apply

☑ Access to capital

☑ Liabilities

(5.3.2.2) Effect type

Select all that apply

☑ Transition risks

☑ Opportunities

(5.3.2.3) Environmental issues relevant to the risks and/or opportunities that have affected these financial planning elements

Select all that apply

☑ Climate change

(5.3.2.4) Describe how environmental risks and/or opportunities have affected these financial planning elements

The Company's financing strategy incorporates sustainability-linked instruments contractually tied to predefined climate performance targets, making access to capital and liabilities directly sensitive to climate performance over the short and medium term. Risk: The existing sustainability-linked bond includes four climate-related KPIs to be assessed as of 31 December 2026 and incorporates a coupon step-up mechanism if targets are not achieved. Failure to meet these targets would increase financing expenses through performance-based pricing adjustments. Higher funding costs would reduce profit before tax and net profit, weaken cash flows available for debt servicing, dividend distribution and investment, and over time place pressure on credit and financing metrics including leverage ratios. Scenario analysis assessed this risk as remaining below the 2.1% revenue materiality threshold across all four climate scenarios and all time horizons, but as increasingly likely under Current Policies and Fragmented World pathways in the medium and long term. Opportunity: Conversely, consistent progress against transition commitments is anticipated to deliver a measurable cost advantage — a green premium, or "greenium" — relative to conventional financing instruments, analysed as a basis-point reduction in financing expenses. Beyond the maturity of the current instrument, a programme-based continuity approach has been adopted to capture greenium opportunities under changing market conditions after 2030. A financing cost sensitivity driver reflecting greenium and weighted average cost of capital is modelled within the scenario framework. Proceeds from sustainability-linked financing are allocated to renewable energy and infrastructure investments supporting the transition.

Row 3

(5.3.2.1) Financial planning elements that have been affected

Select all that apply

☑ Capital expenditures

☑ Assets

(5.3.2.2) Effect type

Select all that apply

☑ Physical risks

☑ Transition risks

☑ Opportunities

(5.3.2.3) Environmental issues relevant to the risks and/or opportunities that have affected these financial planning elements

Select all that apply

☑ Climate change

(5.3.2.4) Describe how environmental risks and/or opportunities have affected these financial planning elements

Capital allocation and asset planning are the financial planning elements most affected by environmental risks and opportunities, over medium and long-term horizons. Resourcing the transition plan: Renewable energy investments by Zorlu Yenilenebilir Enerji A.Ş. and its subsidiaries amounted to TL 1,239,228,000 in the reporting period, with total installed renewable capacity reaching 538 MW and existing renewable energy licences of 496 MW. The R&D and innovation budget was TL 154,448,717. The internal carbon price of USD 70-110 per tonne, referenced to European ETS prices, is integrated into investment feasibility analysis and used to evaluate the cost-effectiveness of emissions reduction strategies. Capital reallocation under regulatory uncertainty: Rather than postponing large-scale commitments, priority was given to shorter-payback projects using existing licensing infrastructure - in-field geothermal optimisation and equipment renewal, and hybrid solar under existing geothermal licences at Kızıldere 2 and 3. Deferred large-scale decisions will be reassessed once the regulatory framework is clearer. Asset valuation and long-term CAPEX: Ongoing ETS pricing may increase the structural cost base of geothermal operations and is incorporated into forward-looking business plans, generation assumptions and valuation models, potentially reducing projected cash flows and increasing the sensitivity of geothermal assets to impairment triggers. Within the storage-integrated wind portfolio, battery degradation requires a capacity augmentation investment projected at 20-25% of the initial BESS investment cost around the tenth year of operation, treated as a capital expenditure item in long-term cash flow projections. SF6 regulatory restrictions may necessitate replacement of switchgear across the distribution infrastructure, increasing capital expenditure on grid modernisation. Adaptation and environmental capital expenditure: Physical risk findings inform investment in flood barriers, relocation of critical infrastructure, undergrounding of distribution lines, reinforcement of transmission lines and the Aerogel Fire Shield Project (TRY 5,277,000). Water-related capital expenditure covers reinjection infrastructure, closed-loop systems at Alaşehir GPP and reverse osmosis capacity at Kızıldere. Forests-related expenditure covers compensatory afforestation and forest-corridor vegetation clearance around generation and grid assets.

[Add row]

(5.4) In your organization’s financial accounting, do you identify spending/revenue that is aligned with your organization’s climate transition?

	Identification of spending/revenue that is aligned with your organization's climate transition	Methodology or framework used to assess alignment with your organization's climate transition	Indicate the level at which you identify the alignment of your spending/revenue with a sustainable finance taxonomy
	Select from: ☑ Yes	*Select all that apply* ☑ A sustainable finance taxonomy	*Select from:* ☑ At both the organization and activity level

[Fixed row]

(5.4.1) Quantify the amount and percentage share of your spending/revenue that is aligned with your organization's climate transition.

Row 1

(5.4.1.1) Methodology or framework used to assess alignment

Select from:

☑ A sustainable finance taxonomy

(5.4.1.2) Taxonomy under which information is being reported

Select from:

☑ Other, please specify :S&P Corporate Sustainability Assessment (CSA) Sustainable Revenues framework, based on EU Taxonomy activity definitions

(5.4.1.3) Objective under which alignment is being reported

Select from:

☑ Total across climate change mitigation and climate change adaptation

(5.4.1.5) Financial metric

Select from:

☑ Revenue/Turnover

(5.4.1.6) Amount of selected financial metric that is aligned in the reporting year (currency)

26816151000

(5.4.1.7) Percentage share of selected financial metric aligned in the reporting year (%)

74

(5.4.1.8) Percentage share of selected financial metric planned to align in 2030 (%)

85

(5.4.1.9) Percentage share of selected financial metric planned to align in 2035 (%)

100

(5.4.1.12) Details of the methodology or framework used to assess alignment with your organization’s climate transition

To assess the alignment of revenue with its climate transition, Zorlu Enerji applies the "Net Sales from Sustainable Activities" metric defined under the S&P Corporate Sustainability Assessment (CSA) Sustainable Revenues framework. This framework derives its activity definitions from the "substantial contribution" criteria of the EU Taxonomy, covering climate change mitigation, climate change adaptation, sustainable use and protection of water resources, transition to a circular economy, pollution prevention and control, and biodiversity and ecosystem protection. In the reporting year, net sales from sustainable business activities amounted to TL 26,816,151 thousand out of total net sales of TL 36,197,416 thousand, representing 74% of turnover, compared with 67% in 2024. Revenues classified as sustainable comprise electricity generated and sold from renewable sources — geothermal (TL 6,298,484 thousand), wind (TL 1,921,332 thousand) and hydroelectric (TL 912,725 thousand) — together with the renewable share of electricity distribution revenues, certified green energy sales under the YEK-G and I-REC systems, carbon credit sales, long-term green power purchase agreements, and revenues from electric vehicle charging services through the ZES network. These relate to mature, commercially deployed technologies. Revenues not classified as sustainable include trading of non-certified grid-supplied electricity and the non-renewable share of distribution revenues. The share is expected to increase as the Company completes its exit from carbon-intensive thermal operations by 2027 and expands renewable capacity, storage and EV charging infrastructure. Projections assume continued access to financing for renewable investment and stable licensing conditions. Alignment figures are derived from the Company's audited consolidated financial statements and disclosed in the Integrated Annual Report; the underlying greenhouse gas data supporting the assessment is subject to independent third-party verification, and the TSRS-compliant Sustainability Report containing related disclosures is subject to limited assurance by KPMG.
[Add row]

(5.4.2) Quantify the percentage share of your spending/revenue that was associated with eligible and aligned activities under the sustainable finance taxonomy in the reporting year.

Row 1

(5.4.2.1) Economic activity

Select from:

☑ Electricity generation from geothermal energy

(5.4.2.2) Taxonomy under which information is being reported

Select from:

☑ Other, please specify :S&P Corporate Sustainability Assessment – CSA framework

(5.4.2.3) Taxonomy alignment

Select from:

☑ Taxonomy-eligible but not aligned

(5.4.2.4) Financial metrics

Select all that apply

☑ Turnover

(5.4.2.10) Taxonomy-eligible but not aligned turnover from this activity in the reporting year (currency)

6298484000

(5.4.2.11) Taxonomy-eligible but not aligned turnover from this activity as % of total turnover in the reporting year

17.4

(5.4.2.24) Calculation methodology and supporting information

Calculated from the net sales attributable to electricity generated and sold from geothermal power plants, as reported in the breakdown of net sales by activity in the Integrated Annual Report: TL 6,298,484 thousand out of total net sales of TL 36,197,416 thousand.

(5.4.2.25) Substantial contribution criteria met

Select from:

☑ No

(5.4.2.26) Details of substantial contribution criteria analysis

The activity is eligible under the EU Taxonomy activity classification for electricity generation from geothermal energy. However, the lifecycle GHG emission intensity of the Company's geothermal generation in the reporting year was approximately 324 g CO_2e/kWh, calculated as 610,079.65 tCO_2e of emissions against 1,881 GWh of geothermal electricity generated. This exceeds the 100 g CO_2e/kWh threshold set out in the Climate Delegated Act (Annex I) and the activity therefore does not meet the technical screening criteria for substantial contribution to climate change mitigation. The emission intensity reflects the naturally high non-condensable gas (NCG) content of geothermal reservoirs in the Aegean region, a characteristic of Turkish geothermal resources rather than of operational performance. The Company is addressing this through the GECO programme at the Kızıldere Geothermal Power Plant, developing NCG treatment and CO_2 reinjection technologies, and has SBTi-validated targets to reduce electricity generation emissions intensity to 0.105 tCO_2e/MWh by 2030 and 0.009 tCO_2e/MWh by 2040, which would bring the activity below the taxonomy threshold.

(5.4.2.27) Do no significant harm requirements met

Select from:

☑ Yes

(5.4.2.28) Details of do no significant harm analysis

The activity complies with do no significant harm criteria through environmental impact assessments conducted for all facilities, reinjection of spent geothermal fluid to maintain reservoir balance and prevent surface water contamination, closed-loop systems at Alaşehir GPP, effluent monitoring by independent accredited laboratories against the discharge limits of the Turkish Water Pollution Control Regulation, site-level biodiversity screening using IBAT and the WWF Biodiversity Risk Filter, and site-specific Biodiversity Action Plans implemented under the Biodiversity and Ecosystem Management System structured in line with IFC Performance Standard 6.

(5.4.2.29) Minimum safeguards compliance requirements met

Select from:

☑ Yes

(5.4.2.30) Attach any supporting evidence

Zorlu Enerji Integrated Annual Report 2025.pdf

Row 2

(5.4.2.1) Economic activity

Select from:

☑ Transmission and distribution of electricity

(5.4.2.2) Taxonomy under which information is being reported

Select from:

☑ Other, please specify :S&P Corporate Sustainability Assessment – CSA framework

(5.4.2.3) Taxonomy alignment

Select from:

☑ Taxonomy-eligible but not aligned

(5.4.2.4) Financial metrics

Select all that apply

☑ Turnover

(5.4.2.10) Taxonomy-eligible but not aligned turnover from this activity in the reporting year (currency)

12365163000

(5.4.2.11) Taxonomy-eligible but not aligned turnover from this activity as % of total turnover in the reporting year

34.16

(5.4.2.24) Calculation methodology and supporting information

Calculated based on total electricity distribution revenues by determining the share of non-renewable electricity (using the Türkiye grid emission factor) and isolating the portion of revenue attributable to the distribution of renewable (clean) electricity.

(5.4.2.25) Substantial contribution criteria met

Select from:

☑ Yes

(5.4.2.26) Details of substantial contribution criteria analysis

The activity involves the transmission and distribution of electricity. It meets the EU Taxonomy technical screening criteria for substantial contribution to climate change mitigation by enabling the integration of renewable energy into the grid, while ensuring that the average grid emission intensity remains below the threshold set out in Annex I (100g CO_2e/kWh).

(5.4.2.27) Do no significant harm requirements met

Select from:

☑ Yes

(5.4.2.28) Details of do no significant harm analysis

The activity meets the "do no significant harm" criteria by minimizing transmission losses, applying SF_6 leak detection and maintenance programs, and ensuring compliance with environmental regulations on electromagnetic fields, noise, and land use.

(5.4.2.29) Minimum safeguards compliance requirements met

Select from:

☑ Yes

(5.4.2.30) Attach any supporting evidence

Zorlu Enerji Integrated Annual Report 2025.pdf

Row 3

(5.4.2.1) Economic activity

Select from:

☑ Electricity generation from wind power

(5.4.2.2) Taxonomy under which information is being reported

Select from:

☑ Other, please specify :S&P Corporate Sustainability Assessment – CSA framework

(5.4.2.3) Taxonomy alignment

Select from:

☑ Taxonomy-eligible but not aligned

(5.4.2.4) Financial metrics

Select all that apply

☑ Turnover

(5.4.2.10) Taxonomy-eligible but not aligned turnover from this activity in the reporting year (currency)

1921332000

(5.4.2.11) Taxonomy-eligible but not aligned turnover from this activity as % of total turnover in the reporting year

5.31

(5.4.2.24) Calculation methodology and supporting information

Calculated based on the revenue from electricity generated and sold from wind power plants.

(5.4.2.25) Substantial contribution criteria met

Select from:

☑ Yes

(5.4.2.26) Details of substantial contribution criteria analysis

The activity involves the generation of electricity from wind power. It meets the EU Taxonomy technical screening criteria for substantial contribution to climate change mitigation by producing electricity from a zero-emission source, staying below the 100g CO_2e/kWh lifecycle GHG threshold, and fulfilling the requirements set out in Annex I of the Climate Delegated Act.

(5.4.2.27) Do no significant harm requirements met

Select from:

☑ Yes

(5.4.2.28) Details of do no significant harm analysis

The activity complies with the "do no significant harm" criteria by conducting environmental impact assessments, monitoring noise and bird collision risks, and implementing mitigation measures to protect local biodiversity.

(5.4.2.29) Minimum safeguards compliance requirements met

Select from:

☑ Yes

(5.4.2.30) Attach any supporting evidence

Zorlu Enerji Integrated Annual Report 2025.pdf

Row 4

(5.4.2.1) Economic activity

Select from:

☑ Electricity generation from hydropower

(5.4.2.2) Taxonomy under which information is being reported

Select from:

☑ Other, please specify :S&P Corporate Sustainability Assessment – CSA framework

(5.4.2.3) Taxonomy alignment

Select from:

☑ Taxonomy-eligible but not aligned

(5.4.2.4) Financial metrics

Select all that apply

☑ Turnover

(5.4.2.10) Taxonomy-eligible but not aligned turnover from this activity in the reporting year (currency)

912725000

(5.4.2.11) Taxonomy-eligible but not aligned turnover from this activity as % of total turnover in the reporting year

2.52

(5.4.2.24) Calculation methodology and supporting information

Calculated based on the revenue from electricity generated and sold from hydropower plants.

(5.4.2.25) Substantial contribution criteria met

Select from:

☑ Yes

(5.4.2.26) Details of substantial contribution criteria analysis

The activity involves the generation of electricity from hydropower. It meets the EU Taxonomy technical screening criteria for substantial contribution to climate change mitigation by generating electricity from a renewable source, maintaining a lifecycle GHG intensity below 100g CO_2e/kWh, and ensuring environmental impact assessments are conducted as required by Annex I.

(5.4.2.27) Do no significant harm requirements met

Select from:

☑ Yes

(5.4.2.28) Details of do no significant harm analysis

The activity meets the "do no significant harm" criteria by complying with water framework regulations, ensuring fish passage systems are in place, maintaining ecological flow, and implementing measures to protect local biodiversity and habitats.

(5.4.2.29) Minimum safeguards compliance requirements met

Select from:

☑ Yes

(5.4.2.30) Attach any supporting evidence

Zorlu Enerji Integrated Annual Report 2025.pdf
[Add row]

(5.4.3) Provide any additional contextual and/or verification/assurance information relevant to your organization's taxonomy alignment.

(5.4.3.1) Details of minimum safeguards analysis

All activities (JES, HES, RES, T&D) are carried out in compliance with international minimum safeguards, including the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the International Bill of Human Rights. Human rights, occupational health and safety, anti-corruption, and ethical business conduct policies are in place and implemented across all operations.

(5.4.3.2) Additional contextual information relevant to your taxonomy accounting

The taxonomy assessment covers all electricity generation (geothermal, hydropower, and wind) and electricity transmission & distribution activities. Turnover figures were derived from the company's financial accounting system based on IFRS standards. For T&D activities, only the share of distributed electricity from renewable sources was considered, calculated using the Türkiye grid emission factor to exclude the non-renewable share.

(5.4.3.3) Indicate whether you will be providing verification/assurance information relevant to your taxonomy alignment in question 13.1

Select from:

☑ No

(5.4.3.4) Explain why you will not be providing verification/assurance information relevant to your taxonomy alignment in question 13.1

Third-party assurance for taxonomy alignment data has not yet been obtained. External assurance is planned to be undertaken in future reporting cycles.
[Fixed row]

(5.5) Does your organization invest in research and development (R&D) of low-carbon products or services related to your sector activities?

(5.5.1) Investment in low-carbon R&D

Select from:

☑ Yes

(5.5.2) Comment

Zorlu Enerji is deeply committed to research and development (R&D) in low-carbon technologies, which are crucial for transitioning to a more sustainable energy future. Our investments span a wide range of innovative solutions within the energy sector, aimed at not only improving efficiency but also uncovering new opportunities for growth. One of the primary areas of focus is carbon capture and storage technology, as demonstrated by our involvement in the GECO project, which is dedicated to developing cutting-edge techniques for reducing carbon emissions from industrial sources. In addition, we are continuously enhancing the performance of our geothermal power plants through projects such as Geosmart and Geopro, ensuring that this renewable energy source becomes even more efficient and reliable. Zorlu Enerji is also playing a pivotal role in the e-mobility revolution through initiatives like the Echarge4Drivers projects, which support the development of electric vehicle (EV) infrastructure and encourage the adoption of clean transportation. Our MASS project, a national smart meter initiative for the distribution sector, is contributing to the digital transformation of energy management, promoting efficiency and better resource utilization. Moreover, our commitment to the circular economy is exemplified by the JIDEP project, where we aim to recycle waste wind turbine blades, integrating them back into the economy rather than letting them end up as waste. This initiative highlights our holistic approach to sustainability, ensuring that the life cycle of renewable energy assets is extended and their environmental impact minimized. Additionally, Zorlu Enerji is participating in several forward-thinking projects under the Horizon 2020 program, including the

development of digital twins for wind power plants. These digital twins allow for advanced event management, predictive maintenance, and downtime simulations, significantly improving the reliability and operational performance of our wind energy assets. By leveraging advanced digital tools, we ensure that our renewable energy operations are not only efficient but also resilient in the face of unforeseen challenges.
[Fixed row]

(5.5.7) Provide details of your organization's investments in low-carbon R&D for your sector activities over the last three years.

Row 1

(5.5.7.1) Technology area

Select from:
☑ Smart grid integration

(5.5.7.2) Stage of development in the reporting year

Select from:
☑ Applied research and development

(5.5.7.3) Average % of total R&D investment over the last 3 years

8

(5.5.7.4) R&D investment figure in the reporting year (unit currency as selected in 1.2) (optional)

12205014.02

(5.5.7.5) Average % of total R&D investment planned over the next 5 years

17

(5.5.7.6) Explain how your R&D investment in this technology area is aligned with your climate commitments and/or climate transition plan

Our distribution network is where the largest share of our emissions reduction opportunity outside generation sits, because technical losses on the network are a direct source of the fuel- and energy-related emissions reported under Scope 3 Category 3, which totalled 1,459,752 tCO2e in 2025 and are the largest single line in our Scope 3 inventory. This investment covers our smart grid laboratory, which tests grid equipment and control strategies before field deployment; asset management platforms that move maintenance from schedule-based to condition-based; a digital twin of the distribution network; and a carbon accounting platform for network operations. Together these reduce losses, defer reinforcement and enable the network to host more distributed renewable generation. We prioritise this area over generation-side research because our distribution licence area covers 49,419 km2 and 2.1 million connections, so the abatement available per unit of research spend is high. Planned investment rises sharply as four European projects enter delivery. Percentages are calculated across our consolidated R&D spend, which combines the research programme of our generation business with that of our electricity distribution business, OEDAS. Information technology and cyber-security projects that carry no low-carbon purpose are excluded from the numerator so that the figures reflect genuinely low-carbon research rather than total R&D activity.

Row 2

(5.5.7.1) Technology area

Select from:

☑ Other, please specify :Geothermal power plant efficiency and flexibility

(5.5.7.2) Stage of development in the reporting year

Select from:

☑ Pilot demonstration

(5.5.7.3) Average % of total R&D investment over the last 3 years

15

(5.5.7.4) R&D investment figure in the reporting year (unit currency as selected in 1.2) (optional)

6933105.73

(5.5.7.5) Average % of total R&D investment planned over the next 5 years

35

(5.5.7.6) Explain how your R&D investment in this technology area is aligned with your climate commitments and/or climate transition plan

Geothermal generation is 72.8% of our output and the largest source of our Scope 1 emissions, so improving its efficiency and flexibility is the single highest-leverage research area available to us. Our SBTi-validated target requires a 73.71% reduction in Scope 1 emission intensity per MWh by 2030 against a 2021 base year, and that reduction cannot be delivered by adding renewable capacity alone; it requires the existing geothermal fleet to produce more energy per unit of reservoir fluid abstracted. The investment covers the nGEL project at Kizildere II, funded under Horizon Europe, which demonstrates trigeneration from geothermal resources at pilot scale, recovering additional useful energy from the same fluid. It builds on our earlier participation in the Horizon 2020 GECO consortium as its only Turkish facility, which captured and reinjected non-condensable gases at Kizildere during its pilot phase. This is the area where planned investment grows most, from 15% to 35% of low-carbon R&D spend, because it is the technology where our operational knowledge is deepest and where the emissions consequence of success is largest. Percentages are calculated across our consolidated R&D spend, which combines the research programme of our generation business with that of our electricity distribution business, OEDAS. Information technology and cyber-security projects that carry no low-carbon purpose are excluded from the numerator so that the figures reflect genuinely low-carbon research rather than total R&D activity.

Row 3

(5.5.7.1) Technology area

Select from:

☑ Onshore wind

(5.5.7.2) Stage of development in the reporting year

Select from:

☑ Applied research and development

(5.5.7.3) Average % of total R&D investment over the last 3 years

6

(5.5.7.4) R&D investment figure in the reporting year (unit currency as selected in 1.2) (optional)

1941583.54

(5.5.7.5) Average % of total R&D investment planned over the next 5 years

4

(5.5.7.6) Explain how your R&D investment in this technology area is aligned with your climate commitments and/or climate transition plan

Wind is the technology receiving the largest share of our planned generation investment to 2030, so research that raises the output and availability of wind assets compounds across the whole of that capital programme rather than applying to a single site. The investment covers the Twinwest project, funded under Horizon Europe, which develops an open digital twin framework for wind farm operation. The objective is to improve energy yield and reduce unplanned downtime through better prediction of component condition and wake behaviour across the farm. The planned share falls slightly because the project reaches completion within the period, not because we are reducing commitment to the technology area; the resulting capability transfers into operation of the new wind capacity we are building. Percentages are calculated across our consolidated R&D spend, which combines the research programme of our generation business with that of our electricity distribution business, OEDAS. Information technology and cyber-security projects that carry no low-carbon purpose are excluded from the numerator so that the figures reflect genuinely low-carbon research rather than total R&D activity.

Row 4

(5.5.7.1) Technology area

Select from:

☑ Other, please specify :Circular economy and composite material recycling

(5.5.7.2) Stage of development in the reporting year

Select from:

☑ Applied research and development

(5.5.7.3) Average % of total R&D investment over the last 3 years

3

(5.5.7.4) R&D investment figure in the reporting year (unit currency as selected in 1.2) (optional)

1963850.78

(5.5.7.5) Average % of total R&D investment planned over the next 5 years

6

(5.5.7.6) Explain how your R&D investment in this technology area is aligned with your climate commitments and/or climate transition plan

Wind turbine blades are the component of our renewable fleet with no established end-of-life route, and the volume reaching decommissioning rises as the industry's first generation of turbines ages. Research here addresses a waste and materials problem that would otherwise become a liability for a company whose growth strategy is built on wind. The investment covers the Verti-Go project, which develops recycling routes for composite materials and designs for reduced primary material use. It supports the circular economy commitment in our Deforestation Combat Policy, which commits us to preserving the value of equipment dependent on natural resources through a circular economy approach. We have chosen to invest here rather than treating blade waste as a downstream disposal question because the material choices that determine recyclability are made at procurement, which is within our control. Planned investment doubles as the work moves from laboratory to demonstration. Percentages are calculated across our consolidated R&D spend, which combines the research programme of our generation business with that of our electricity distribution business, OEDAS. Information technology and cyber-security projects that carry no low-carbon purpose are excluded from the numerator so that the figures reflect genuinely low-carbon research rather than total R&D activity.

Row 5

(5.5.7.1) Technology area

Select from:

☑ Demand response

(5.5.7.2) Stage of development in the reporting year

Select from:

☑ Pilot demonstration

(5.5.7.3) Average % of total R&D investment over the last 3 years

3

(5.5.7.4) R&D investment figure in the reporting year (unit currency as selected in 1.2) (optional)

4283887.85

(5.5.7.5) Average % of total R&D investment planned over the next 5 years

5

(5.5.7.6) Explain how your R&D investment in this technology area is aligned with your climate commitments and/or climate transition plan

Managing when and where demand occurs allows the network to absorb more variable renewable generation without reinforcement, which avoids both the emissions embodied in new equipment and the losses associated with congested operation. The investment covers spatial load forecasting software, which predicts demand growth geographically so that capacity is added where it is actually needed, and medium-voltage fault analysis and switching research that shortens outages and allows the network to be operated closer to its dynamic limits. We prioritise this over storage research because our regulatory role as a distribution operator gives us direct control over network planning and operation, whereas storage deployment sits largely with third parties. Planned investment rises as the medium-voltage work moves into field trials. Percentages are calculated across our consolidated R&D spend, which combines the research programme of our generation business with that of our electricity distribution business, OEDAS. Information technology and cyber-security projects that carry no low-carbon purpose are excluded from the numerator so that the figures reflect genuinely low-carbon research rather than total R&D activity.

Row 6

(5.5.7.1) Technology area

Select from:

☑ Efficient transmission technology

(5.5.7.2) Stage of development in the reporting year

Select from:

☑ Small scale commercial deployment

(5.5.7.3) Average % of total R&D investment over the last 3 years

1

(5.5.7.4) R&D investment figure in the reporting year (unit currency as selected in 1.2) (optional)

3048780.79

(5.5.7.5) Average % of total R&D investment planned over the next 5 years

1

(5.5.7.6) Explain how your R&D investment in this technology area is aligned with your climate commitments and/or climate transition plan

Technical and non-technical losses on the distribution network are a direct emissions source: every unit lost must be generated. Reducing them is the most immediate abatement lever available to our distribution business, and our reported network loss rate was 7.06% on an annual load of 8,074 GWh in 2025. The investment covers leakage voltage detection and measurement systems, now in small scale commercial deployment across the network, and sweep frequency response analysis for transformer fault detection, which identifies degrading transformers before failure and before efficiency deteriorates. The share of R&D spend is modest because these technologies are proven and the work is deployment rather than research; we report them here because they are the stage of maturity our research pipeline is designed to reach, and because they demonstrate that our low-carbon R&D reaches commercial use rather than stopping at demonstration. Percentages are calculated across our consolidated R&D spend, which combines the research programme of our generation business with that of our electricity distribution business, OEDAS. Information technology and cyber-security projects that carry no low-carbon purpose are excluded from the numerator so that the figures reflect genuinely low-carbon research rather than total R&D activity.
[Add row]

(5.7) Break down, by source, your organization’s CAPEX in the reporting year and CAPEX planned over the next 5 years.

Coal – Hard

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

We have no coal-fired power generation and made no capital expenditure on hard coal generation in the reporting year, nor is any planned. Our coal use is confined to the Lüleburgaz steam plant, which supplies process steam to industrial customers and does not generate electricity, so it falls outside the scope of this question. No new coal plant has been approved for development at any time. Reporting year figures are taken directly from Note 15 to our audited 2025 consolidated financial statements, which discloses additions to construction in progress by project. Total additions were 1,230,103 thousand Turkish lira, comprising 945,722 thousand lira for improvement works at Kizildere I, II and III, 102,713 thousand lira for improvement works and hybrid solar projects at Alasehir I, 170,209 thousand lira for improvement works at Gokcedag, and 12,651 thousand lira of corporate and other projects that are not attributable to a generation technology and are excluded here. Generation capital expenditure of 1,218,644 thousand lira therefore forms the denominator for the reporting year percentages. Amounts are expressed in the purchasing power of 31 December 2025 in accordance with the inflation accounting requirements applied to our financial statements. Five-year figures are taken from the approved generation investment plan in our financial model, which totals approximately USD 500 million over 2026 to 2030 and comprises new-build projects together with sustaining capital expenditure on the existing fleet.

Coal - Brown

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

We have no brown coal or lignite power generation, made no capital expenditure on it in the reporting year, and have none planned. No such plant has ever been approved for development. Reporting year figures are taken directly from Note 15 to our audited 2025 consolidated financial statements, which discloses additions to construction in progress by project. Total additions were 1,230,103 thousand Turkish lira, comprising 945,722 thousand lira for improvement works at Kizildere I, II and III, 102,713 thousand lira for improvement works and hybrid solar projects at Alasehir I, 170,209 thousand lira for improvement works at Gokcedag, and 12,651 thousand lira of corporate and other projects that are not attributable to a generation technology and are excluded here. Generation capital expenditure of 1,218,644 thousand lira therefore forms the denominator for the reporting year percentages. Amounts are expressed in the purchasing power of 31 December 2025 in accordance with the inflation accounting requirements applied to our financial statements. Five-year figures are taken from the approved generation investment plan

in our financial model, which totals approximately USD 500 million over 2026 to 2030 and comprises new-build projects together with sustaining capital expenditure on the existing fleet.

Oil

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

We have no oil-fired power generation, made no capital expenditure on it in the reporting year, and have none planned. Reporting year figures are taken directly from Note 15 to our audited 2025 consolidated financial statements, which discloses additions to construction in progress by project. Total additions were 1,230,103 thousand Turkish lira, comprising 945,722 thousand lira for improvement works at Kizildere I, II and III, 102,713 thousand lira for improvement works and hybrid solar projects at Alasehir I, 170,209 thousand lira for improvement works at Gokcedag, and 12,651 thousand lira of corporate and other projects that are not attributable to a generation technology and are excluded here. Generation capital expenditure of 1,218,644 thousand lira therefore forms the denominator for the reporting year percentages. Amounts are expressed in the purchasing power of 31 December 2025 in accordance with the inflation accounting requirements applied to our financial statements. Five-year figures are taken from the approved generation investment plan in our financial model, which totals approximately USD 500 million over 2026 to 2030 and comprises new-build projects together with sustaining capital expenditure on the existing fleet.

Gas

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

We have no gas-fired power generation. Our remaining interest in a gas-fired asset in Israel, held without operational control, was divested during 2025. No capital expenditure on gas generation was made in the reporting year and none is planned. Reporting year figures are taken directly from Note 15 to our audited 2025 consolidated financial statements, which discloses additions to construction in progress by project. Total additions were 1,230,103 thousand Turkish lira, comprising 945,722 thousand lira for improvement works at Kizildere I, II and III, 102,713 thousand lira for improvement works and hybrid solar projects at Alasehir I, 170,209 thousand lira for improvement works at Gokcedag, and 12,651 thousand lira of corporate and other projects that are not attributable to a generation technology and are excluded here. Generation capital expenditure of 1,218,644 thousand lira therefore forms the denominator for the reporting year percentages. Amounts are expressed in the purchasing power of 31 December 2025 in accordance with the inflation accounting requirements applied to our financial statements. Five-year figures are taken from the approved generation investment plan in our financial model, which totals approximately USD 500 million over 2026 to 2030 and comprises new-build projects together with sustaining capital expenditure on the existing fleet.

Sustainable biomass

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Not applicable to our portfolio. No capital expenditure in the reporting year and none planned. Reporting year figures are taken directly from Note 15 to our audited 2025 consolidated financial statements, which discloses additions to construction in progress by project. Total additions were 1,230,103 thousand Turkish lira, comprising 945,722 thousand lira for improvement works at Kizildere I, II and III, 102,713 thousand lira for improvement works and hybrid solar projects at Alasehir I, 170,209 thousand lira for improvement works at Gokcedag, and 12,651 thousand lira of corporate and other projects that are not attributable to a generation technology and are excluded here. Generation capital expenditure of 1,218,644 thousand lira therefore forms the denominator for the reporting year percentages. Amounts are expressed in the purchasing power of 31 December 2025 in accordance with the inflation accounting requirements applied to our financial statements. Five-year figures are taken from the approved generation investment plan in our financial model, which totals approximately USD 500 million over 2026 to 2030 and comprises new-build projects together with sustaining capital expenditure on the existing fleet.

Other biomass

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Not applicable to our portfolio. No capital expenditure in the reporting year and none planned. Reporting year figures are taken directly from Note 15 to our audited 2025 consolidated financial statements, which discloses additions to construction in progress by project. Total additions were 1,230,103 thousand Turkish lira, comprising 945,722 thousand lira for improvement works at Kizildere I, II and III, 102,713 thousand lira for improvement works and hybrid solar projects at Alasehir I, 170,209 thousand lira for improvement works at Gokcedag, and 12,651 thousand lira of corporate and other projects that are not attributable to a generation technology and are excluded here. Generation capital expenditure of 1,218,644 thousand lira therefore forms the denominator for the reporting year percentages.

Amounts are expressed in the purchasing power of 31 December 2025 in accordance with the inflation accounting requirements applied to our financial statements. Five-year figures are taken from the approved generation investment plan in our financial model, which totals approximately USD 500 million over 2026 to 2030 and comprises new-build projects together with sustaining capital expenditure on the existing fleet.

Waste (non-biomass)

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Not applicable to our portfolio. No capital expenditure in the reporting year and none planned. Reporting year figures are taken directly from Note 15 to our audited 2025 consolidated financial statements, which discloses additions to construction in progress by project. Total additions were 1,230,103 thousand Turkish lira, comprising 945,722 thousand lira for improvement works at Kizildere I, II and III, 102,713 thousand lira for improvement works and hybrid solar projects at Alasehir I, 170,209 thousand lira for improvement works at Gokcedag, and 12,651 thousand lira of corporate and other projects that are not attributable to a generation technology and are excluded here. Generation capital expenditure of 1,218,644 thousand lira therefore forms the denominator for the reporting year percentages. Amounts are expressed in the purchasing power of 31 December 2025 in accordance with the inflation accounting requirements applied to our financial statements. Five-year figures are taken from the approved generation investment plan in our financial model, which totals approximately USD 500 million over 2026 to 2030 and comprises new-build projects together with sustaining capital expenditure on the existing fleet.

Nuclear

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Not applicable to our portfolio. No capital expenditure in the reporting year and none planned. Reporting year figures are taken directly from Note 15 to our audited 2025 consolidated financial statements, which discloses additions to construction in progress by project. Total additions were 1,230,103 thousand Turkish lira, comprising 945,722 thousand lira for improvement works at Kizildere I, II and III, 102,713 thousand lira for improvement works and hybrid solar projects at Alasehir I, 170,209 thousand lira for improvement works at Gokcedag, and 12,651 thousand lira of corporate and other projects that are not attributable to a generation technology and are excluded here. Generation capital expenditure of 1,218,644 thousand lira therefore forms the denominator for the reporting year percentages. Amounts are expressed in the purchasing power of 31 December 2025 in accordance with the inflation accounting requirements applied to our financial statements. Five-year figures are taken from the approved generation investment plan in our financial model, which totals approximately USD 500 million over 2026 to 2030 and comprises new-build projects together with sustaining capital expenditure on the existing fleet.

Geothermal

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

1048435000

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

86.04

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

17.33

(5.7.4) Most recent year in which a new power plant using this source was approved for development

2016

(5.7.5) Explain your CAPEX calculations, including any assumptions

Geothermal is our largest generating technology at 72.8% of 2025 output. Reporting year capital expenditure was improvement and optimisation work on the existing fleet rather than new capacity: 945,722 thousand lira at Kizildere I, II and III and 102,713 thousand lira at Alasehir I, as disclosed in Note 15 to our financial statements. The Alasehir figure also covers the hybrid solar projects at that site and is reported here rather than under solar, because the financial statements disclose the two together. Hybrid solar capacity commissioned during 2025 totalled 1.6 MWp. The five-year figure comprises approximately USD 50 million for the Alkan geothermal plant, with an indicative commercial operation date of 2028, and approximately USD 35 million of sustaining capital expenditure on existing geothermal assets, giving approximately USD 90 million of the plan. Reporting year figures are taken directly from Note 15 to our audited 2025 consolidated financial statements, which discloses additions to construction in progress by project. Total additions were 1,230,103 thousand Turkish lira, comprising 945,722 thousand lira for improvement works at Kizildere I, II and III, 102,713 thousand lira for improvement works and hybrid solar projects at Alasehir I, 170,209 thousand lira for improvement works at Gokcedag, and 12,651 thousand lira of corporate and other projects that are not attributable to a generation technology and are excluded here. Generation capital expenditure of 1,218,644 thousand lira therefore forms the denominator for the reporting year percentages. Amounts are expressed in the purchasing power of 31 December 2025 in accordance with the inflation accounting requirements applied to our financial statements. Five-year figures are taken from the approved generation investment plan in our financial model, which totals approximately USD 500 million over 2026 to 2030 and comprises new-build projects together with sustaining capital expenditure on the existing fleet. The year reported as the most recent approval for development is derived from the commercial operation date of the most recent plant using this source, on the basis that the final investment decision precedes commissioning by approximately two years. Our most recent geothermal plant, Kızıldere III, entered commercial operation in July 2018.

Ocean thermal

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Not applicable to our portfolio. No capital expenditure in the reporting year and none planned. Reporting year figures are taken directly from Note 15 to our audited 2025 consolidated financial statements, which discloses additions to construction in progress by project. Total additions were 1,230,103 thousand Turkish lira, comprising 945,722 thousand lira for improvement works at Kizildere I, II and III, 102,713 thousand lira for improvement works and hybrid solar projects at Alasehir I, 170,209 thousand lira for improvement works at Gokcedag, and 12,651 thousand lira of corporate and other projects that are not attributable to a generation technology and are excluded here. Generation capital expenditure of 1,218,644 thousand lira therefore forms the denominator for the reporting year percentages. Amounts are expressed in the purchasing power of 31 December 2025 in accordance with the inflation accounting requirements applied to our financial statements. Five-year figures are taken from the approved generation investment plan in our financial model, which totals approximately USD 500 million over 2026 to 2030 and comprises new-build projects together with sustaining capital expenditure on the existing fleet.

Hydropower

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

1.98

(5.7.4) Most recent year in which a new power plant using this source was approved for development

2006

(5.7.5) Explain your CAPEX calculations, including any assumptions

Our seven hydroelectric plants are all operational and were commissioned in 2008; no new hydroelectric capacity has been approved since. No hydroelectric capital expenditure was incurred in the reporting year, consistent with Note 15 to our financial statements, which records no additions to construction in progress for these assets. Routine maintenance at these plants is expensed rather than capitalised. The five-year figure of approximately USD 10 million is sustaining capital expenditure only. We have no plans for new hydroelectric capacity. Reporting year figures are taken directly from Note 15 to our audited 2025 consolidated financial statements, which discloses additions to construction in progress by project. Total additions were 1,230,103 thousand Turkish lira, comprising 945,722 thousand lira for improvement works at Kizildere I, II and III, 102,713 thousand lira for improvement works and hybrid solar projects at Alasehir I, 170,209 thousand lira for improvement works at Gokcedag, and 12,651 thousand lira of corporate and other projects that are not attributable to a generation technology and are excluded here. Generation capital expenditure of 1,218,644 thousand lira therefore forms the denominator for the reporting year percentages. Amounts are expressed in the purchasing power of 31 December 2025 in accordance with the inflation accounting requirements applied to our financial statements. Five-year figures are taken from the approved generation investment plan in our financial model, which totals approximately USD 500 million over 2026 to 2030 and comprises new-build projects together with sustaining capital expenditure on the existing fleet. The year reported as the most recent approval for development is derived from the commercial operation date of the most recent plant using this source, on the basis that the final investment decision precedes commissioning by approximately two years. Our seven hydroelectric plants all entered commercial operation in 2008 and no new hydroelectric capacity has been approved since.

Onshore wind

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

170209000

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

13.96

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

77.28

(5.7.4) Most recent year in which a new power plant using this source was approved for development

2011

(5.7.5) Explain your CAPEX calculations, including any assumptions

Reporting year capital expenditure of 170,209 thousand lira was improvement work at the Gokcedag wind plant, as disclosed in Note 15 to our financial statements. That asset was divested on 29 December 2025; the expenditure was incurred while it was under our operational control during the year and is reported accordingly. Wind is the technology receiving the great majority of our forward investment. The five-year plan includes the Hamitabat storage wind project at 125 MW and the Yenicftlik storage wind project at 200 MW, both with a commercial operation date of 2029, together accounting for the majority of the plan. This allocation is the capital expenditure expression of our climate transition plan. Reporting year figures are taken directly from Note 15 to our audited 2025 consolidated financial statements, which discloses additions to construction in progress by project. Total additions were 1,230,103 thousand Turkish lira, comprising 945,722 thousand lira for improvement works at Kizildere I, II and III, 102,713 thousand lira for improvement works and hybrid solar projects at Alasehir I, 170,209 thousand lira for improvement works at Gokcedag, and 12,651 thousand lira of corporate and other projects that are not attributable to a generation technology and are excluded here. Generation capital expenditure of 1,218,644 thousand lira therefore forms the denominator for the reporting year percentages. Amounts are expressed in the purchasing power of 31 December 2025 in accordance with the inflation accounting requirements applied to our financial statements. Five-year figures are taken from the approved generation investment plan in our financial model, which totals approximately USD 500 million over 2026 to 2030 and comprises new-build projects together with sustaining capital expenditure on the existing fleet. The year reported as the most recent approval for development is derived from the commercial operation date of the most recent plant using this source, on the basis that the final investment decision precedes commissioning by approximately two years. The year reported relates to our 56.4 MW Jhimpir wind plant in Pakistan, which remains in operation and reached financial close in 2011, entering commercial operation in 2013. Our Gökçedağ plant was divested in December 2025.

Offshore wind

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

We have no offshore wind assets and none are planned. Reporting year figures are taken directly from Note 15 to our audited 2025 consolidated financial statements, which discloses additions to construction in progress by project. Total additions were 1,230,103 thousand Turkish lira, comprising 945,722 thousand lira for improvement works at Kizildere I, II and III, 102,713 thousand lira for improvement works and hybrid solar projects at Alasehir I, 170,209 thousand lira for improvement works at Gokcedag, and 12,651 thousand lira of corporate and other projects that are not attributable to a generation technology and are excluded here. Generation capital expenditure of 1,218,644 thousand lira therefore forms the denominator for the reporting year percentages. Amounts are expressed in the purchasing power of 31 December 2025 in accordance with the inflation accounting requirements applied to our financial statements. Five-year figures are taken from the approved generation investment plan in our financial model, which totals approximately USD 500 million over 2026 to 2030 and comprises new-build projects together with sustaining capital expenditure on the existing fleet.

Solar

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

3.41

(5.7.4) Most recent year in which a new power plant using this source was approved for development

2023

(5.7.5) Explain your CAPEX calculations, including any assumptions

Three hybrid solar units totalling 1.6 MWp were commissioned during 2025 at Kizildere I, Alasehir and Alkan. The associated capital expenditure is not separable from the geothermal site improvement figures disclosed in Note 15 to our financial statements, which report Alasehir improvement works and hybrid solar projects as a single line, so it is reported under geothermal rather than duplicated here. The five-year figure of under USD 20 million covers further hybrid solar units at Kizildere II and Kizildere III, with commercial operation dates in 2027, together with sustaining capital expenditure on operating solar assets. Hybrid solar is deployed at existing geothermal sites because grid connection and land are already in place, which makes the marginal cost of additional renewable capacity low. Reporting year figures

are taken directly from Note 15 to our audited 2025 consolidated financial statements, which discloses additions to construction in progress by project. Total additions were 1,230,103 thousand Turkish lira, comprising 945,722 thousand lira for improvement works at Kizildere I, II and III, 102,713 thousand lira for improvement works and hybrid solar projects at Alasehir I, 170,209 thousand lira for improvement works at Gokcedag, and 12,651 thousand lira of corporate and other projects that are not attributable to a generation technology and are excluded here. Generation capital expenditure of 1,218,644 thousand lira therefore forms the denominator for the reporting year percentages. Amounts are expressed in the purchasing power of 31 December 2025 in accordance with the inflation accounting requirements applied to our financial statements. Five-year figures are taken from the approved generation investment plan in our financial model, which totals approximately USD 500 million over 2026 to 2030 and comprises new-build projects together with sustaining capital expenditure on the existing fleet. The year reported as the most recent approval for development is derived from the commercial operation date of the most recent plant using this source, on the basis that the final investment decision precedes commissioning by approximately two years. Our most recent solar capacity, the hybrid unit at Kızıldere I, entered commercial operation in May 2025.

Wave

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Not applicable to our portfolio. No capital expenditure in the reporting year and none planned. Reporting year figures are taken directly from Note 15 to our audited 2025 consolidated financial statements, which discloses additions to construction in progress by project. Total additions were 1,230,103 thousand Turkish lira, comprising 945,722 thousand lira for improvement works at Kizildere I, II and III, 102,713 thousand lira for improvement works and hybrid solar projects at Alasehir I, 170,209 thousand lira for improvement works at Gokcedag, and 12,651 thousand lira of corporate and other projects that are not attributable to a generation technology and are excluded here. Generation capital expenditure of 1,218,644 thousand lira therefore forms the denominator for the reporting year percentages. Amounts are expressed in the purchasing power of 31 December 2025 in accordance with the inflation accounting requirements applied to our financial statements. Five-year figures are taken from the approved generation investment plan in our financial model, which totals approximately USD 500 million over 2026 to 2030 and comprises new-build projects together with sustaining capital expenditure on the existing fleet.

Tidal

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Not applicable to our portfolio. No capital expenditure in the reporting year and none planned. Reporting year figures are taken directly from Note 15 to our audited 2025 consolidated financial statements, which discloses additions to construction in progress by project. Total additions were 1,230,103 thousand Turkish lira, comprising 945,722 thousand lira for improvement works at Kizildere I, II and III, 102,713 thousand lira for improvement works and hybrid solar projects at Alasehir I, 170,209 thousand lira for improvement works at Gokcedag, and 12,651 thousand lira of corporate and other projects that are not attributable to a generation technology and are excluded here. Generation capital expenditure of 1,218,644 thousand lira therefore forms the denominator for the reporting year percentages. Amounts are expressed in the purchasing power of 31 December 2025 in accordance with the inflation accounting requirements applied to our financial statements. Five-year figures are taken from the approved generation investment plan in our financial model, which totals approximately USD 500 million over 2026 to 2030 and comprises new-build projects together with sustaining capital expenditure on the existing fleet.

Fossil-fuel plants fitted with CCS

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

We operate no fossil-fuel generation and therefore no plants fitted with carbon capture and storage. Our carbon capture research is applied to geothermal non-condensable gases through the GECO project rather than to fossil-fuel plant, and is reported under low-carbon research and development in question 5.5.7. Reporting year figures are taken directly from Note 15 to our audited 2025 consolidated financial statements, which discloses additions to construction in progress by project. Total additions were 1,230,103 thousand Turkish lira, comprising 945,722 thousand lira for improvement works at Kizildere I, II and III, 102,713 thousand lira for improvement works and hybrid solar projects at Alasehir I, 170,209 thousand lira for improvement works at Gokcedag, and 12,651 thousand lira of corporate and other projects that are not attributable to a generation technology and are excluded here. Generation capital expenditure of 1,218,644 thousand lira therefore forms the denominator for the reporting year percentages. Amounts are expressed in the purchasing power of 31 December 2025 in accordance with the inflation accounting requirements applied to our financial statements. Five-year figures are taken from the approved generation investment plan in our financial model, which totals approximately USD 500 million over 2026 to 2030 and comprises new-build projects together with sustaining capital expenditure on the existing fleet.

Other renewable (e.g. renewable hydrogen)

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

No capital expenditure on other renewable generation technologies was made in the reporting year and none is planned. Reporting year figures are taken directly from Note 15 to our audited 2025 consolidated financial statements, which discloses additions to construction in progress by project. Total additions were 1,230,103 thousand Turkish lira, comprising 945,722 thousand lira for improvement works at Kizildere I, II and III, 102,713 thousand lira for improvement works and hybrid solar projects at Alasehir I, 170,209 thousand lira for improvement works at Gokcedag, and 12,651 thousand lira of corporate and other projects that are not attributable to a generation technology and are excluded here. Generation capital expenditure of 1,218,644 thousand lira therefore forms the denominator for the reporting year percentages. Amounts are expressed in the purchasing power of 31 December 2025 in accordance with the inflation accounting requirements applied to our financial statements. Five-year figures are taken from the approved generation investment plan in our financial model, which totals approximately USD 500 million over 2026 to 2030 and comprises new-build projects together with sustaining capital expenditure on the existing fleet.

Other non-renewable (e.g. non-renewable hydrogen)

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

No capital expenditure on other non-renewable generation technologies was made in the reporting year and none is planned. Reporting year figures are taken directly from Note 15 to our audited 2025 consolidated financial statements, which discloses additions to construction in progress by project. Total additions were 1,230,103 thousand Turkish lira, comprising 945,722 thousand lira for improvement works at Kizildere I, II and III, 102,713 thousand lira for improvement works and hybrid solar projects at Alasehir I, 170,209 thousand lira for improvement works at Gokcedag, and 12,651 thousand lira of corporate and other projects that are not attributable to a generation technology and are excluded here. Generation capital expenditure of 1,218,644 thousand lira therefore forms the denominator for the reporting year percentages. Amounts are expressed in the purchasing power of 31 December 2025 in accordance with the inflation accounting requirements applied to our financial statements. Five-year figures are taken from the approved generation investment plan in our financial model, which totals approximately USD 500 million over 2026 to 2030 and comprises new-build projects together with sustaining capital expenditure on the existing fleet.
[Fixed row]

(5.7.1) Break down your total planned CAPEX in your current CAPEX plan for products and services (e.g. smart grids, digitalization, etc.).

Row 1

(5.7.1.1) Products and services

Select from:

☑ Other, please specify :Renewable energy (large scale storage, hybrid PPs, Solar, Geothermal PPs)

(5.7.1.2) Description of product/service

We are building 325 MW of new wind capacity with integrated storage, 20 MW of new geothermal capacity and further hybrid solar capacity at existing geothermal sites. This is the largest single component of our capital plan and the mechanism through which our SBTi-validated targets are delivered. The Hamitabat storage wind plant at 125 MW and the Yenicftlik storage wind plant at 200 MW both have a commercial operation date of 2029 and account for USD 396.3 million of the plan. The Alkan geothermal plant at 20 MW has a commercial operation date of 2028 and accounts for USD 52.0 million. Hybrid solar units at Kizildere II and Kizildere III, with commercial operation dates in 2027, together with sustaining capital expenditure on the existing fleet, account for the balance. Output is sold into the Turkish wholesale electricity market and through our retail business OEPSAS to commercial, industrial and residential customers, so the customer base reached is the same population served by our retail and distribution operations. The new capacity is expected to add approximately 1,000 GWh of annual renewable generation once fully operational, against total group generation of 2,585 GWh in 2025. Stage of implementation: the wind projects are in development and pre-construction, the Alkan geothermal plant is in construction, and the hybrid solar units are in installation. Capital expenditure is concentrated in 2027 and 2028. Our investment plan is maintained in US dollars and has been translated at 42.95 lira to the dollar, the closing rate at 31 December 2025. Total planned capital expenditure for products and services over 2026 to 2030 is USD 960.1 million, comprising USD 512.8 million in generation and USD 447.3 million in distribution.

(5.7.1.3) CAPEX planned for product/service

22024330500

(5.7.1.4) Percentage of total CAPEX planned for products and services

53.41

(5.7.1.5) End year of CAPEX plan

2030

Row 2

(5.7.1.1) Products and services

Select from:

☑ Distributed generation

(5.7.1.2) Description of product/service

Our electricity distribution business OEDAS invests continuously in the network that serves Eskisehir, Afyonkarahisar, Bilecik, Kutahya and Usak. This capital expenditure enables distributed generation to connect, reduces technical losses and improves the digital observability of the network. The licence area covers 49,419 square kilometres and 2,131,171 connections across residential, commercial, industrial and municipal customers. Annual distributed load was 8,074 GWh in 2025 with a loss rate of 7.06%. Reducing that loss rate is a direct emissions reduction: every unit lost must be generated, and losses are the largest component of our Scope 3 Category 3 emissions, which totalled 1,459,752 tCO2e in 2025. The programme includes smart grid and network automation, geographic information and asset management systems, outage management, digital monitoring and predictive maintenance, and capacity reinforcement to accommodate rooftop solar and other distributed generation connecting to the network. Several of these are supported by the research projects reported in question 5.5.7, which move from demonstration into deployment across this capital plan. Stage of implementation: full implementation and continuous. Capital expenditure is broadly level across the plan period at approximately USD 90 million a year, set within the regulated investment framework agreed with the Energy Market Regulatory Authority. Our investment plan is maintained in US dollars and has been translated at 42.95 lira to the dollar, the closing rate at 31 December 2025. Total planned capital expenditure for products and services over 2026 to 2030 is USD 960.1 million, comprising USD 512.8 million in generation and USD 447.3 million in distribution.

(5.7.1.3) CAPEX planned for product/service

19209817000

(5.7.1.4) Percentage of total CAPEX planned for products and services

46.59

(5.7.1.5) End year of CAPEX plan

2030

Row 3

(5.7.1.1) Products and services

Select from:

☑ Other, please specify :Demand-side efficiency business (EV charging network and solar smart grid equipment sales)

(5.7.1.2) Description of product/service

Operational control of our electric vehicle charging business transferred to our joint venture partner during 2025, while we retained a 49.99% interest. From that point the business sits outside our consolidated boundary, and its emissions are reported under Scope 3 Category 15 rather than Scope 1 and 2. As a consequence, no capital expenditure for electric vehicle charging infrastructure or demand-side equipment sales is included in our current consolidated capital expenditure plan, and the figures reported here are nil. We continue to engage with our joint venture partner on the decarbonization of the asset, but we do not direct its investment. The charging network remains in full commercial operation and continues to serve residential and commercial electric vehicle users across Türkiye. We report this row for continuity with previous disclosures, in which this business was within our boundary, so that the change is visible rather than appearing as an unexplained gap. Our investment plan is maintained in US dollars and has been translated at 42.95 lira to the dollar, the closing rate at 31 December 2025. Total planned capital expenditure for products and services over 2026 to 2030 is USD 960.1 million, comprising USD 512.8 million in generation and USD 447.3 million in distribution.

(5.7.1.3) CAPEX planned for product/service

0

(5.7.1.4) Percentage of total CAPEX planned for products and services

0

(5.7.1.5) End year of CAPEX plan

2030
[Add row]

(5.9) What is the trend in your organization’s water-related capital expenditure (CAPEX) and operating expenditure (OPEX) for the reporting year, and the anticipated trend for the next reporting year?

(5.9.1) Water-related CAPEX (+/- % change)

0

(5.9.2) Anticipated forward trend for CAPEX (+/- % change)

25

(5.9.3) Water-related OPEX (+/- % change)

51.52

(5.9.4) Anticipated forward trend for OPEX (+/- % change)

18

(5.9.5) Please explain

These figures are estimates. No water-specific capital expenditure was incurred in either 2024 or 2025: our package treatment plants, reverse osmosis units and reinjection infrastructure were already in place and required no additions, so the change is nil rather than unknown. Water-related OPEX comprises municipal water and wastewater charges, abstraction permit and discharge consent renewals, laboratory analysis, ISO 14046 verification at two entities and well maintenance. The 2025 estimate combines abstraction volume growth of 7.0% with cost inflation: Turkish producer prices in water supply rose 57.15% and consumer prices 34.88% on a twelve-month average. We anticipate CAPEX to rise as we extend direct metering of hydroelectric return flows and assess further condensate recovery at Luleburgaz, both required to deliver the water intensity target reported in 9.15.1. OPEX growth should slow with inflation; our contracted ISO 14046 verification fee rises 8.33% in 2026.
[Fixed row]

(5.10) Does your organization use an internal price on environmental externalities?

Carbon

(5.10.1) Use of internal pricing for this environmental externality

Select from:
☑ Yes

Water

(5.10.1) Use of internal pricing for this environmental externality

Select from:

☑ No, but we plan to in the next two years

(5.10.2) Primary reason for not pricing this environmental externality

Select from:

☑ No standardized procedure

(5.10.3) Explain why your organization does not price this environmental externality

Water is material to our operations and we manage it through volumetric targets rather than through an internal price. We have set targets to reduce water withdrawal intensity from 35.9 to 21.2 m3/MWh by 2030, to reduce total water consumption by 10% year on year, and to reduce consumption in areas of high and extremely high water stress by 10% year on year, as reported in question 9.15.1. We have not yet established an internal water price because we have not identified a methodology we consider robust for valuing water beyond its market price in the basins where we operate. Unlike carbon, where an established internal price is in place, water externality valuation lacks a comparable standardized approach, and a single corporate price would not reflect the very different basin conditions across our portfolio, which range from low stress to extremely high stress. We intend to develop an internal water price within the next two years, building on the basin-level risk assessment we conduct using the WRI Aqueduct Water Risk Atlas and the WWF Water Risk Filter, and applying a differentiated price that reflects local water stress. We will apply it first to investment appraisal for new generation capacity.

Other

(5.10.1) Use of internal pricing for this environmental externality

Select from:

☑ No, but we plan to in the next two years

[Fixed row]

(5.10.1) Provide details of your organization’s internal price on carbon.

Row 1

(5.10.1.1) Type of pricing scheme

Select from:

☑ Shadow price

(5.10.1.2) Objectives for implementing internal price

Select all that apply

☑ Navigate regulations
☑ Drive energy efficiency
☑ Set a carbon offset budget
☑ Drive low-carbon investment
☑ Conduct cost-benefit analysis
☑ Identify and seize low-carbon opportunities
☑ Influence strategy and/or financial planning
☑ Setting and/or achieving of climate-related policies and targets
☑ Incentivize consideration of climate-related issues in decision making

(5.10.1.3) Factors considered when determining the price

Select all that apply

☑ Scenario analysis
☑ Benchmarking against peers
☑ Alignment to scientific guidance
☑ Alignment to international standards
☑ Alignment with the price of a carbon tax
☑ Alignment with the price of allowances under an Emissions Trading Scheme
☑ Price/cost of renewable energy procurement
☑ Price/cost of voluntary carbon offset credits
☑ Price with substantive impact on business decisions
☑ Cost of required measures to achieve climate-related targets
☑ Alignment with the price of carbon border adjustment mechanism

(5.10.1.4) Calculation methodology and assumptions made in determining the price

Our internal carbon price was determined by evaluating four carbon pricing scenarios published by Bloomberg NEF: the SBTi Scenario, the Hybrid Market Scenario, the Voluntary Carbon Market Scenario, and the Renewable Energy-Focused Market Representation Scenario. Assessing the range of outcomes across these four scenarios rather than adopting a single trajectory allows the price to remain robust to uncertainty in how carbon pricing develops in our markets. On this basis we established an initial internal carbon price in the range of USD 70 to 110 per tonne of CO2e. The range was benchmarked against EU ETS allowance prices to align our decision-making with the signal expected under a functioning Turkish ETS. The price is set in US dollars and converted to Turkish lira using the average rate applied in our 2025 consolidated financial statements. The principal assumptions are: that carbon pricing becomes an operative cost in Türkiye following the Climate Law No. 7552, published on 9 July 2025, and the Turkish ETS Regulation that followed; that EU ETS prices remain a reasonable proxy for the medium-term cost of carbon relevant to our portfolio; and that a price set toward the upper end of the observed scenario range is appropriate for long-lived generation assets. As the Turkish ETS had not generated actual compliance costs during the reporting year, no realised regulatory carbon cost was incurred in 2025 and the price operates as a shadow price only.

(5.10.1.5) Scopes covered

Select all that apply

☑ Scope 1
☑ Scope 2
☑ Scope 3, Category 14 – Franchises
☑ Scope 3, Category 15 – Investments
☑ Scope 3, Category 2 - Capital goods
☑ Scope 3, Category 1 - Purchased goods and services
☑ Scope 3, Category 10 - Processing of sold products
☑ Scope 3, Category 5 - Waste generated in operations
☑ Scope 3, Category 12 - End-of-life treatment of sold products
☑ Scope 3, Category 4 - Upstream transportation and distribution
☑ Scope 3, Category 6 - Business travel
☑ Scope 3, Category 7 - Employee commuting
☑ Scope 3, Category 11 - Use of sold products
☑ Scope 3, Category 8 - Upstream leased assets
☑ Scope 3, Category 13 - Downstream leased assets
☑ Scope 3, Category 9 - Downstream transportation and distribution
☑ Scope 3, Category 3 - Fuel- and energy-related activities (not included in Scope 1 or 2)

(5.10.1.6) Pricing approach used – spatial variance

Select from:

☑ Differentiated

(5.10.1.7) Indicate how and why the price is differentiated

The price is applied as a range rather than a single value because the four scenarios evaluated produce materially different trajectories, and because the carbon exposure of our assets differs by generation technology and by market. Two factors drive the variation. First, technology: our geothermal assets carry direct process emissions and therefore a real exposure to carbon pricing, our steam supply operation at Lüleburgaz is fuelled by coal, and our wind, solar and hydroelectric assets have negligible direct emissions. A single price applied uniformly would not distinguish between these positions. Second, market: exposure differs between electricity sold domestically under the emerging Turkish Emissions Trading System and activity linked to the European market, where the Carbon Border Adjustment Mechanism creates a separate and higher price signal. The lower bound of the range is therefore applied as a conservative floor in near-term operational and procurement decisions, and the upper bound is applied when appraising long-lived generation investments and when stress-testing the resilience of the portfolio.

(5.10.1.8) Pricing approach used – temporal variance

Select from:

☑ Evolutionary

(5.10.1.9) Indicate how you expect the price to change over time

We expect the internal price to rise materially over the coming years, and we review it against updated scenario projections rather than holding it fixed. Our TSRS base assumption, derived from the NGFS Net Zero Emissions scenario and taking the Turkish Emissions Trading System into account, projects a carbon price rising from EUR 5.80/tCO2e in 2026 and EUR 11.60/tCO2e in 2027 to EUR 67.70/tCO2e in 2030, EUR 161.30/tCO2e in 2035 and EUR 254.90/tCO2e in 2040. This represents an increase of more than forty-fold between 2027 and 2040. We maintain differentiated carbon pricing projections across four distinct climate scenarios for the period 2026 to 2040, so the trajectory we apply depends on the scenario being tested. Under high transition risk scenarios shadow prices are projected to rise from around USD 200/tCO2e to USD 600/tCO2e by 2050, whereas under a current policies scenario they remain close to zero. We will revise our internal price as Turkish ETS price formation emerges following the start of pilot implementation in 2026.

(5.10.1.10) Minimum actual price used (currency per metric ton CO2e)

2800

(5.10.1.11) Maximum actual price used (currency per metric ton CO2e)

4400

(5.10.1.12) Business decision-making processes the internal price is applied to

Select all that apply

☑ Operations
☑ Procurement
☑ Remuneration
☑ Product and R&D
☑ Risk management
☑ Impact management
☑ Capital expenditure
☑ Opportunity management
☑ Value chain engagement
☑ Dependencies management

(5.10.1.13) Internal price is mandatory within business decision-making processes

Select from:

☑ Yes, for all decision-making processes

(5.10.1.14) % total emissions in the reporting year in selected scopes this internal price covers

100

(5.10.1.15) Pricing approach is monitored and evaluated to achieve objectives

Select from:

☑ Yes

(5.10.1.16) Details of how the pricing approach is monitored and evaluated to achieve your objectives

The internal carbon price is monitored by the Sustainability Directorate and reviewed by the Sustainability Committee, which comprises two Board members and the Chief Executive Officer and meets quarterly. Monitoring has two components. The first is external: we track the development of the Turkish Emissions Trading System established under Climate Law No. 7552 and its implementing regulation, together with European Union Emissions Trading System allowance prices and Carbon Border Adjustment Mechanism developments, and we update our scenario projections annually against these. The second is internal: we assess whether the price is in fact changing investment outcomes, by reviewing the carbon-adjusted returns of projects appraised during the year against the returns that would have been calculated without the price applied. The price has had a demonstrable effect on our capital allocation. Our planned generation investment to 2030 is directed to renewable capacity, and applying the internal price to feasibility analysis makes the relative economics of low-carbon generation explicit at the point of decision rather than after the fact. It also supports delivery of our SBTi-validated targets, against which our 2025 performance was on or ahead of the interim milestones for Scope 1 intensity, absolute Scope 2 and combined Scope 1 and fuel- and energy-related Scope 3 intensity. Where monitoring shows that the price is no longer consistent with observed market signals or with the trajectory required by our targets, the range is revised. We expect the first substantive revision once Turkish ETS price formation emerges following pilot implementation in 2026.
[Add row]

(5.11) Do you engage with your value chain on environmental issues?

Suppliers

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

☑ Yes

(5.11.2) Environmental issues covered

Select all that apply

☑ Climate change

☑ Forests

☑ Water

Smallholders

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

☑ No, but we plan to within the next two years

(5.11.3) Primary reason for not engaging with this stakeholder on environmental issues

Select from:

☑ Not an immediate strategic priority

(5.11.4) Explain why you do not engage with this stakeholder on environmental issues

Our upstream value chain for forest-risk commodities consists of corporate manufacturers and distributors rather than smallholders. Our timber-related sourcing is office furniture and wood-based equipment purchased from established manufacturers, and we have not identified smallholder producers within our supply base. We are extending our supplier mapping beyond tier 1 over the next two years, and if smallholder producers are identified at deeper tiers we will develop an engagement approach for them at that point.

Customers

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

☑ Yes

(5.11.2) Environmental issues covered

Select all that apply

☑ Climate change

☑ Water

Investors and shareholders

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

☑ Yes

(5.11.2) Environmental issues covered

Select all that apply

☑ Climate change

Other value chain stakeholders

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

☑ Yes

(5.11.2) Environmental issues covered

Select all that apply

☑ Climate change

☑ Forests

[Fixed row]

(5.11.1) Does your organization assess and classify suppliers according to their dependencies and/or impacts on the environment?

Climate change

(5.11.1.1) Assessment of supplier dependencies and/or impacts on the environment

Select from:

☑ Yes, we assess the dependencies and/or impacts of our suppliers

(5.11.1.2) Criteria for assessing supplier dependencies and/or impacts on the environment

Select all that apply

☑ Contribution to supplier-related Scope 3 emissions

(5.11.1.3) % Tier 1 suppliers assessed

Select from:

☑ Less than 1%

(5.11.1.4) Define a threshold for classifying suppliers as having substantive dependencies and/or impacts on the environment

A supplier is classified as having a substantive climate impact where it meets either threshold. Scope 3 contribution: suppliers designated strategic or critical under our Sustainable Supply Chain Policy whose goods or services materially contribute to our Scope 3 Category 1 and 2 emissions. Sector exposure: suppliers in high-emitting sectors including fossil fuels, mining and heavy manufacturing, regardless of spend or strategic status.

(5.11.1.5) % Tier 1 suppliers meeting the threshold for substantive dependencies and/or impacts on the environment

Select from:

☑ 100%

(5.11.1.6) Number of Tier 1 suppliers meeting the thresholds for substantive dependencies and/or impacts on the environment

11

Forests

(5.11.1.1) Assessment of supplier dependencies and/or impacts on the environment

Select from:

☑ Yes, we assess the dependencies and/or impacts of our suppliers

(5.11.1.2) Criteria for assessing supplier dependencies and/or impacts on the environment

Select all that apply

☑ Dependence on ecosystem services/environmental assets
☑ Impact on deforestation or conversion of other natural ecosystems
☑ Impact on habitats
☑ Impact on threatened and protected species

(5.11.1.3) % Tier 1 suppliers assessed

Select from:
☑ Less than 1%

(5.11.1.4) Define a threshold for classifying suppliers as having substantive dependencies and/or impacts on the environment

A supplier is classified as having a substantive forests impact where it meets any of three thresholds. Land conversion: upstream production requiring clearance of natural forest or other natural ecosystem. Location: operation within a Key Biodiversity Area or legally designated protected area identified in our biodiversity exposure analysis. Inputs: dependence on timber or other forest-derived materials for equipment or packaging supplied to us.

(5.11.1.5) % Tier 1 suppliers meeting the threshold for substantive dependencies and/or impacts on the environment

Select from:
☑ 100%

(5.11.1.6) Number of Tier 1 suppliers meeting the thresholds for substantive dependencies and/or impacts on the environment

11

Water

(5.11.1.1) Assessment of supplier dependencies and/or impacts on the environment

Select from:
☑ Yes, we assess the dependencies and/or impacts of our suppliers

(5.11.1.2) Criteria for assessing supplier dependencies and/or impacts on the environment

Select all that apply

☑ Basin/landscape/marine ecosystem condition

☑ Dependence on water

☑ Impact on water availability

☑ Impact on pollution levels

(5.11.1.3) % Tier 1 suppliers assessed

Select from:

☑ Less than 1%

(5.11.1.4) Define a threshold for classifying suppliers as having substantive dependencies and/or impacts on the environment

A supplier is classified as having a substantive water impact where it meets either threshold. Volume: annual withdrawal above 10,000 cubic meters, or process water use material to the supplier's own production. Location: operation in a catchment classified as high or extremely high baseline water stress under the WRI Aqueduct Water Risk Atlas, cross-checked against the WWF Water Risk Filter, the same tools we apply to our own sites.

(5.11.1.5) % Tier 1 suppliers meeting the threshold for substantive dependencies and/or impacts on the environment

Select from:

☑ 100%

(5.11.1.6) Number of Tier 1 suppliers meeting the thresholds for substantive dependencies and/or impacts on the environment

11
[Fixed row]

(5.11.2) Does your organization prioritize which suppliers to engage with on environmental issues?

Climate change

(5.11.2.1) Supplier engagement prioritization on this environmental issue

Select from:

☑ Yes, we prioritize which suppliers to engage with on this environmental issue

(5.11.2.2) Criteria informing which suppliers are prioritized for engagement on this environmental issue

Select all that apply

☑ Procurement spend

☑ Regulatory compliance

☑ Business risk mitigation

☑ Strategic status of suppliers

☑ Supplier performance improvement

☑ In line with the criteria used to classify suppliers as having substantive dependencies and/or impacts relating to climate change

(5.11.2.4) Please explain

We prioritize the same suppliers that our assessment identifies as having a substantive climate impact, so that engagement effort follows exposure rather than being spread evenly across a supply base of over 1,400 companies. In practice this means suppliers designated strategic or critical under our Sustainable Supply Chain Policy, those whose goods or services materially contribute to our Scope 3 Category 1 and 2 emissions, and those operating in high-emitting sectors. Critical and strategic suppliers are evaluated against ESG criteria aligned with ISO 26000, the UN Global Compact and the GRI Standards, and receive a scorecard covering environmental management, energy, emissions, water and waste, certification and regulatory compliance, social and human resources practices, stakeholder relations and corporate governance. Where the scorecard identifies gaps, an ESG action plan is agreed and shared with the Procurement Directorate, and progress is tracked alongside training and awareness sessions on our expectations. Prioritization is tied directly to procurement: suppliers with credible climate programmes are viewed favourably in tender evaluation, which gives the engagement commercial weight. This applies across our generation, distribution and retail businesses rather than to a single product line.

Forests

(5.11.2.1) Supplier engagement prioritization on this environmental issue

Select from:

☑ Yes, we prioritize which suppliers to engage with on this environmental issue

(5.11.2.2) Criteria informing which suppliers are prioritized for engagement on this environmental issue

Select all that apply

☑ In line with the criteria used to classify suppliers as having substantive dependencies and/or impacts relating to forests

☑ Material sourcing

☑ Regulatory compliance

☑ Reputation management

☑ Strategic status of suppliers

(5.11.2.4) Please explain

We prioritize the same suppliers that our assessment identifies as having a substantive forests impact, so that engagement is directed at the part of our supply base where land use is actually at stake rather than across all suppliers. As a renewable energy company our forests exposure does not arise from trading forest-risk commodities. It arises from land use in the siting and construction of generation and grid assets, and from the embedded land-use footprint of upstream equipment supply. We therefore prioritize construction contractors and equipment manufacturers whose activities involve land clearance or forest-derived inputs, suppliers operating within or adjacent to Key Biodiversity Areas or legally designated protected areas identified in our biodiversity exposure analysis, and suppliers designated strategic or critical under our Sustainable Supply Chain Policy. Regulatory compliance and reputation are additional drivers: our Deforestation Combat Policy commits us to ensuring that our activities, directly and throughout our supply chain, do not contribute to deforestation, and to managing deforestation-related risks in the supply chain by 2035. Prioritized suppliers receive targeted engagement and are included in our capacity building programmes.

Water

(5.11.2.1) Supplier engagement prioritization on this environmental issue

Select from:

☑ Yes, we prioritize which suppliers to engage with on this environmental issue

(5.11.2.2) Criteria informing which suppliers are prioritized for engagement on this environmental issue

Select all that apply

☑ In line with the criteria used to classify suppliers as having substantive dependencies and/or impacts relating to water

☑ Business risk mitigation

☑ Strategic status of suppliers

☑ Supplier performance improvement

☑ Suppliers’ exposure or vulnerability to physical risks

(5.11.2.4) Please explain

We prioritize the same suppliers that our assessment identifies as having a substantive water impact, so that engagement follows both the volume of water a supplier uses and the condition of the catchment it operates in. Suppliers operating in catchments classified as high or extremely high baseline water stress under the WRI Aqueduct Water Risk Atlas, cross-checked against the WWF Water Risk Filter, are prioritized because water scarcity in those locations is a direct threat to supply continuity as well as to the catchment itself. These are the same tools we apply to our own sites, so supplier and own-operation exposure are assessed on a consistent basis. Prioritized suppliers are evaluated through our ESG due diligence process, aligned with the Zorlu Holding Supplier Principles and supported by the Synesgy ESG assessment system, which screens country, sector and commodity risk and scores suppliers from A to E. Contractual agreements require suppliers to commit to the Zorlu Holding Code of Conduct and our sustainability principles, which gives us leverage to enforce water management expectations. Where deficiencies in water, energy or waste management are identified, an improvement action plan is agreed and targeted capacity building is provided.
[Fixed row]

(5.11.5) Do your suppliers have to meet environmental requirements as part of your organization’s purchasing process?

Climate change

(5.11.5.1) Suppliers have to meet specific environmental requirements related to this environmental issue as part of the purchasing process

Select from:
☑ Yes, environmental requirements related to this environmental issue are included in our supplier contracts

(5.11.5.2) Policy in place for addressing supplier non-compliance

Select from:
☑ Yes, we have a policy in place for addressing non-compliance

(5.11.5.3) Comment

Our environmental requirements are set out in technical specifications developed for each procurement category and incorporated into the agreement signed with the successful tenderer, so they are a contractual obligation. The process is governed by our Sustainable Supply Chain Policy, and suppliers must also commit to the Zorlu Holding Code of Conduct. We reserve the right to audit compliance against these specifications. For climate change, requirements cover compliance with applicable environmental legislation and emissions permits, the environmental management arrangements the supplier operates, and the energy, emissions and

waste management practices assessed through our ESG scorecard. Suppliers designated critical or strategic are evaluated against criteria aligned with ISO 26000, the UN Global Compact and the GRI Standards, and credible climate programmes are viewed favourably in tender evaluation. Where non-compliance is identified, our approach is to correct rather than to exit. An improvement action plan is agreed with the supplier, progress is tracked, and targeted training and capacity building are provided. Suspension or removal from our approved supplier list is applied only where a supplier declines to engage or fails to remedy a material breach. Fuller detail is provided in question 5.11.6.

Forests

(5.11.5.1) Suppliers have to meet specific environmental requirements related to this environmental issue as part of the purchasing process

Select from:

☑ Yes, environmental requirements related to this environmental issue are included in our supplier contracts

(5.11.5.2) Policy in place for addressing supplier non-compliance

Select from:

☑ Yes, we have a policy in place for addressing non-compliance

(5.11.5.3) Comment

Our environmental requirements are set out in technical specifications developed for each procurement category and incorporated into the agreement signed with the successful tenderer, so they are a contractual obligation. The process is governed by our Sustainable Supply Chain Policy, and suppliers must also commit to the Zorlu Holding Code of Conduct. We reserve the right to audit compliance against these specifications. For forests, requirements follow our Deforestation Combat Policy, which commits us to ensuring that our activities and supply chain do not contribute to deforestation. Contractors carrying out construction and land works must comply with the environmental impact assessment conditions for each site, including restrictions on vegetation clearance and on activity near protected areas and Key Biodiversity Areas identified in our biodiversity exposure analysis, and must restore disturbed areas on completion. Suppliers must also respect internationally recognised human rights, ILO labour standards and the customary land rights of local communities. Where non-compliance is identified, our approach is to correct rather than to exit. An improvement action plan is agreed with the supplier, progress is tracked, and targeted training and capacity building are provided. Suspension or removal from our approved supplier list is applied only where a supplier declines to engage or fails to remedy a material breach. Fuller detail is provided in question 5.11.6.

Water

(5.11.5.1) Suppliers have to meet specific environmental requirements related to this environmental issue as part of the purchasing process

Select from:

☑ Yes, environmental requirements related to this environmental issue are included in our supplier contracts

(5.11.5.2) Policy in place for addressing supplier non-compliance

Select from:

☑ Yes, we have a policy in place for addressing non-compliance

(5.11.5.3) Comment

Our environmental requirements are set out in technical specifications developed for each procurement category and incorporated into the agreement signed with the successful tenderer, so they are a contractual obligation. The process is governed by our Sustainable Supply Chain Policy, and suppliers must also commit to the Zorlu Holding Code of Conduct. We reserve the right to audit compliance against these specifications. For water, requirements cover compliance with national water and wastewater legislation, including abstraction permits and discharge consents, the water management practices assessed through our ESG scorecard, and site-specific conditions where work is carried out in or near a watercourse. Contractors at our hydroelectric and geothermal sites must protect water quality in the receiving watercourse and comply with the environmental flow and discharge conditions set in our operating licences. Suppliers operating in catchments we classify as water stressed receive closer scrutiny. Where non-compliance is identified, our approach is to correct rather than to exit. An improvement action plan is agreed with the supplier, progress is tracked, and targeted training and capacity building are provided. Suspension or removal from our approved supplier list is applied only where a supplier declines to engage or fails to remedy a material breach. Fuller detail is provided in question 5.11.6.
[Fixed row]

(5.11.6) Provide details of the environmental requirements that suppliers have to meet as part of your organization's purchasing process, and the compliance measures in place.

Climate change

(5.11.6.1) Environmental requirement

Select from:

☑ Environmental disclosure through a non-public platform

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

☑ First-party verification

☑ Grievance mechanism/ Whistleblowing hotline
☑ Supplier scorecard or rating
☑ Supplier self-assessment

(5.11.6.3) % tier 1 suppliers by procurement spend required to comply with this environmental requirement

Select from:
☑ 76-99%

(5.11.6.4) % tier 1 suppliers by procurement spend in compliance with this environmental requirement

Select from:
☑ 51-75%

(5.11.6.7) % tier 1 supplier-related scope 3 emissions attributable to the suppliers required to comply with this environmental requirement

Select from:
☑ 76-99%

(5.11.6.8) % tier 1 supplier-related scope 3 emissions attributable to the suppliers in compliance with this environmental requirement

Select from:
☑ 51-75%

(5.11.6.9) Response to supplier non-compliance with this environmental requirement

Select from:
☑ Retain and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:

☑ 100%

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply

☑ Assessing the efficacy and efforts of non-compliant supplier actions through consistent and quantified metrics

☑ Developing quantifiable, time-bound targets and milestones to bring suppliers back into compliance

☑ Providing information on appropriate actions that can be taken to address non-compliance

☑ Re-integrating suppliers back into upstream value chain based on the successful and verifiable completion of activities

(5.11.6.12) Comment

Environmental requirements are set out in technical specifications incorporated into the contract signed with each successful tenderer, under our Sustainable Supply Chain Policy. Percentages by procurement spend are calculated as the share of 2025 procurement spend placed under contracts containing these specifications; the balance is low-value spot purchasing outside the tender process. Compliance percentages reflect suppliers whose compliance we have confirmed through the ESG scorecard, self-assessment returns or our own verification during the reporting year. Suppliers disclose environmental data to us through our ESG maturity assessment, which is not a public platform. The assessment covers environmental management, energy use, emissions, water and waste, certification and regulatory compliance. Scorecards rank suppliers from A to E, and where gaps are found an action plan is agreed with the supplier and shared with the Procurement Directorate. Scope 3 percentages are derived by mapping suppliers under contract to the upstream categories in our Scope 3 inventory, principally Category 1 purchased goods and services and Category 2 capital goods.

Forests

(5.11.6.1) Environmental requirement

Select from:

☑ No deforestation or conversion of other natural ecosystems

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

☑ First-party verification

☑ Grievance mechanism/ Whistleblowing hotline

☑ Supplier scorecard or rating

☑ Supplier self-assessment

(5.11.6.3) % tier 1 suppliers by procurement spend required to comply with this environmental requirement

Select from:

☑ 76-99%

(5.11.6.4) % tier 1 suppliers by procurement spend in compliance with this environmental requirement

Select from:

☑ 51-75%

(5.11.6.5) % tier 1 suppliers with substantive environmental dependencies and/or impacts related to this environmental issue required to comply with this environmental requirement

Select from:

☑ 100%

(5.11.6.6) % tier 1 suppliers with substantive environmental dependencies and/or impacts related to this environmental issue that are in compliance with this environmental requirement

Select from:

☑ 76-99%

(5.11.6.9) Response to supplier non-compliance with this environmental requirement

Select from:

☑ Retain and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:

☑ 100%

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply

☑ Assessing the efficacy and efforts of non-compliant supplier actions through consistent and quantified metrics

☑ Developing quantifiable, time-bound targets and milestones to bring suppliers back into compliance

☑ Providing information on appropriate actions that can be taken to address non-compliance

☑ Re-integrating suppliers back into upstream value chain based on the successful and verifiable completion of activities

(5.11.6.12) Comment

Environmental requirements are set out in technical specifications incorporated into the contract signed with each successful tenderer, under our Sustainable Supply Chain Policy. Percentages by procurement spend are calculated as the share of 2025 procurement spend placed under contracts containing these specifications; the balance is low-value spot purchasing outside the tender process. Compliance percentages reflect suppliers whose compliance we have confirmed through the ESG scorecard, self-assessment returns or our own verification during the reporting year. Our Deforestation Combat Policy commits us to ensuring that our activities and supply chain do not contribute to deforestation, and this is passed to contractors as a contractual requirement. Contractors carrying out construction and land works must comply with the environmental impact assessment conditions for each site, including restrictions on vegetation clearance and on activity near protected areas and Key Biodiversity Areas identified in our biodiversity exposure analysis, and must restore disturbed areas on completion. All suppliers we classify as having a substantive forests impact are under contract and therefore required to comply. Compliance is confirmed through site supervision during works, the ESG scorecard and supplier self-assessment.

Water

(5.11.6.1) Environmental requirement

Select from:

☑ Environmental disclosure through a non-public platform

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

☑ First-party verification

☑ Grievance mechanism/ Whistleblowing hotline

☑ Supplier scorecard or rating

☑ Supplier self-assessment

(5.11.6.3) % tier 1 suppliers by procurement spend required to comply with this environmental requirement

Select from:

☑ 76-99%

(5.11.6.4) % tier 1 suppliers by procurement spend in compliance with this environmental requirement

Select from:

☑ 51-75%

(5.11.6.5) % tier 1 suppliers with substantive environmental dependencies and/or impacts related to this environmental issue required to comply with this environmental requirement

Select from:

☑ 100%

(5.11.6.6) % tier 1 suppliers with substantive environmental dependencies and/or impacts related to this environmental issue that are in compliance with this environmental requirement

Select from:

☑ 76-99%

(5.11.6.9) Response to supplier non-compliance with this environmental requirement

Select from:

☑ Retain and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:

☑ 100%

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply

☑ Assessing the efficacy and efforts of non-compliant supplier actions through consistent and quantified metrics

☑ Developing quantifiable, time-bound targets and milestones to bring suppliers back into compliance

☑ Providing information on appropriate actions that can be taken to address non-compliance

☑ Re-integrating suppliers back into upstream value chain based on the successful and verifiable completion of activities

(5.11.6.12) Comment

Environmental requirements are set out in technical specifications incorporated into the contract signed with each successful tenderer, under our Sustainable Supply Chain Policy. Percentages by procurement spend are calculated as the share of 2025 procurement spend placed under contracts containing these specifications; the balance is low-value spot purchasing outside the tender process. Compliance percentages reflect suppliers whose compliance we have confirmed through the ESG scorecard, self-assessment returns or our own verification during the reporting year. Water requirements cover compliance with national water and wastewater legislation, including abstraction permits and discharge consents, and site-specific conditions where work is carried out in or near a watercourse. Contractors at our hydroelectric and geothermal sites must protect water quality in the receiving watercourse and comply with the environmental flow and discharge conditions set in our operating licences. All suppliers we classify as having a substantive water impact are under contract and therefore required to comply. Suppliers operating in catchments we classify as high or extremely high baseline water stress under the WRI Aqueduct Water Risk Atlas receive closer scrutiny in the assessment.
[Add row]

(5.11.7) Provide further details of your organization’s supplier engagement on environmental issues.

Climate change

(5.11.7.2) Action driven by supplier engagement

Select from:

☑ Emissions reduction

(5.11.7.3) Type and details of engagement

Capacity building

☑ Provide training, support and best practices on how to make credible renewable energy usage claims

☑ Provide training, support and best practices on how to measure GHG emissions

☑ Provide training, support and best practices on how to mitigate environmental impact

☑ Support suppliers to develop public time-bound action plans with clear milestones

☑ Support suppliers to set their own environmental commitments across their operations

Information collection

☑ Collect environmental risk and opportunity information at least annually from suppliers

☑ Collect GHG emissions data at least annually from suppliers

(5.11.7.4) Upstream value chain coverage

Select all that apply

☑ Tier 1 suppliers

(5.11.7.5) % of tier 1 suppliers by procurement spend covered by engagement

Select from:

☑ 51-75%

(5.11.7.6) % of tier 1 supplier-related scope 3 emissions covered by engagement

Select from:

☑ 51-75%

(5.11.7.9) Describe the engagement and explain the effect of your engagement on the selected environmental action

This engagement goes beyond the contractual requirements reported in 5.11.5 and 5.11.6. Critical and strategic suppliers complete our ESG maturity assessment annually, which collects GHG emissions data, energy use and environmental risk information, and produces a scorecard ranking the supplier from A to E. Where the scorecard identifies gaps, we agree an action plan and roadmap with the supplier, deliver training and awareness sessions covering emissions management, energy and resource efficiency and carbon footprint reduction, and re-score the supplier in the following year so that progress is tracked rather than assumed. Coverage is reported by procurement spend rather than by supplier count because our spend is concentrated in a small number of large equipment and construction contracts; the suppliers we engage most intensively are those that account for the majority of spend and of our upstream Scope 3 emissions in Categories 1 and 2. We measure success on three metrics: the proportion of engaged suppliers improving their scorecard grade year on year, the proportion of agreed action plan milestones completed on time, and participation in our training programme. In 2025, half of our critical suppliers took part in supplier training. The engagement supports our climate transition plan directly: our SBTi-validated Scope 3 target requires reductions we cannot deliver alone, so building supplier capability to measure and reduce emissions is the mechanism through which that target is met. It also supports vulnerable suppliers, typically smaller local firms without in-house sustainability capacity, by providing the technical guidance they would otherwise have to buy in.

(5.11.7.10) Engagement is helping your tier 1 suppliers meet an environmental requirement related to this environmental issue

Select from:

☑ Yes, please specify the environmental requirement :Environmental disclosure through a non-public platform

(5.11.7.11) Engagement is helping your tier 1 suppliers engage with their own suppliers on the selected action

Select from:

☑ Yes

Forests

(5.11.7.1) Commodity

Select from:

☑ Timber products

(5.11.7.2) Action driven by supplier engagement

Select from:

☑ No deforestation and/or conversion of other natural ecosystems

(5.11.7.3) Type and details of engagement

Capacity building

☑ Provide training, support and best practices on how to mitigate environmental impact

☑ Support suppliers to develop public time-bound action plans with clear milestones

☑ Support suppliers to set their own environmental commitments across their operations

Information collection

☑ Collect environmental risk and opportunity information at least annually from suppliers

Innovation and collaboration

☑ Encourage collaborative work in landscapes or jurisdictions

(5.11.7.4) Upstream value chain coverage

Select all that apply

☑ Tier 1 suppliers

(5.11.7.5) % of tier 1 suppliers by procurement spend covered by engagement

Select from:

☑ 51-75%

(5.11.7.7) % tier 1 suppliers with substantive impacts and/or dependencies related to this environmental issue covered by engagement

Select from:

☑ 100%

(5.11.7.9) Describe the engagement and explain the effect of your engagement on the selected environmental action

This engagement goes beyond the contractual requirements reported in 5.11.5 and 5.11.6. Our forests exposure has two distinct sources. The first is timber products purchased through our supply chain, principally wood-based office furniture procured for our distribution business, which accounted for 61.8 tonnes of the 63.9 tonnes of forest-risk commodity material we sourced in 2025. The second is land use in the siting and construction of generation and grid assets. For timber suppliers we collect environmental risk information annually through our ESG maturity assessment, in which environmental management and certification are scored categories, and we engage furniture and equipment suppliers on the origin and certification status of the wood they use. Where the assessment identifies gaps we agree an action plan and provide training on mitigating environmental impact, and we support suppliers in setting their own environmental commitments and time-bound targets. For construction contractors we hold pre-works briefings on the environmental impact assessment conditions applying to each site, including restrictions on vegetation clearance and on activity near protected areas and Key Biodiversity Areas identified in our biodiversity exposure analysis, and we require restoration of disturbed areas on completion. We also encourage collaborative work at landscape level. Our Zero Carbon Footprint Forests programme is delivered with local communities, environmental organizations and government agencies, and we had planted 692,000 saplings by the end of 2025 against a target of 1.2 million by 2035. Success is measured by the proportion of timber suppliers able to evidence the origin of wood inputs, the absence of unauthorised clearance incidents during works, completion of site restoration on handover, and the proportion of engaged suppliers with their own environmental commitments in place. All suppliers we classify as having a substantive forests impact are covered.

(5.11.7.10) Engagement is helping your tier 1 suppliers meet an environmental requirement related to this environmental issue

Select from:

☑ Yes, please specify the environmental requirement :No deforestation or conversion of other natural ecosystems

(5.11.7.11) Engagement is helping your tier 1 suppliers engage with their own suppliers on the selected action

Select from:
☑ Yes

Water

(5.11.7.2) Action driven by supplier engagement

Select from:
☑ Total water withdrawal volumes reduction

(5.11.7.3) Type and details of engagement

Capacity building
☑ Provide training, support and best practices on how to mitigate environmental impact
☑ Support suppliers to develop public time-bound action plans with clear milestones
☑ Support suppliers to set their own environmental commitments across their operations

Information collection
☑ Collect environmental risk and opportunity information at least annually from suppliers
☑ Collect water quality information at least annually from suppliers (e.g., discharge quality, pollution incidents, hazardous substances)
☑ Collect water quantity information at least annually from suppliers (e.g., withdrawal and discharge volumes)

(5.11.7.4) Upstream value chain coverage

Select all that apply
☑ Tier 1 suppliers

(5.11.7.5) % of tier 1 suppliers by procurement spend covered by engagement

Select from:

☑ 51-75%

(5.11.7.7) % tier 1 suppliers with substantive impacts and/or dependencies related to this environmental issue covered by engagement

Select from:

☑ 100%

(5.11.7.9) Describe the engagement and explain the effect of your engagement on the selected environmental action

This engagement goes beyond the contractual requirements reported in 5.11.5 and 5.11.6. We collect water withdrawal and discharge volumes, discharge quality information and environmental risk information from critical and strategic suppliers at least annually through our ESG maturity assessment, in which water management is one of the scored environmental categories. Suppliers operating in catchments we classify as high or extremely high baseline water stress under the WRI Aqueduct Water Risk Atlas, cross-checked against the WWF Water Risk Filter, receive closer scrutiny and are prioritized for engagement. These are the same tools we apply to our own sites, so supplier and own-operation exposure are assessed on a consistent basis. Where the assessment identifies weaknesses in water management, we provide training on mitigating environmental impact and support the supplier in setting time-bound targets and its own water commitments. Success is measured by the proportion of engaged suppliers reporting water data year on year, improvement in the water component of the ESG scorecard, and completion of agreed action plan milestones. The engagement contributes directly to our own water targets: we have committed to reducing water withdrawal intensity from 35.9 to 21.2 m3/MWh by 2030 and to reducing consumption in water-stressed areas by 10% year on year, and supplier water performance is part of the picture in the catchments we share. It also supports vulnerable suppliers, typically smaller local firms, by giving them a structured way to understand and manage their water exposure.

(5.11.7.10) Engagement is helping your tier 1 suppliers meet an environmental requirement related to this environmental issue

Select from:

☑ Yes, please specify the environmental requirement :Environmental disclosure through a non-public platform

(5.11.7.11) Engagement is helping your tier 1 suppliers engage with their own suppliers on the selected action

Select from:

☑ Yes

[Add row]

(5.11.9) Provide details of any environmental engagement activity with other stakeholders in the value chain.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☑ Customers

(5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Educate and work with stakeholders on understanding and measuring exposure to environmental risks

☑ Share information on environmental initiatives, progress and achievements

Innovation and collaboration

☑ Align your organization’s goals to support customers’ targets and ambitions

☑ Collaborate with stakeholders on innovations to reduce environmental impacts in products and services

(5.11.9.3) % of stakeholder type engaged

Select from:

☑ 76-99%

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

☑ 76-99%

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

Customers are the destination of the electricity we generate, distribute and sell, and the emissions embedded in that electricity sit in our downstream Scope 3 inventory. They were identified as a material stakeholder group in our double materiality analysis, and our SBTi-validated Scope 3 target cannot be met without shifting what customers buy. The scope of engagement covers the retail customers of OEPSAŞ and the distribution customers of OEDAŞ. We provide emissions and

environmental performance information through customer channels and our public reporting, offer renewable electricity products certified under the YEK-G guarantee of origin scheme, and work with larger industrial and commercial customers to align our supply offering with their own decarbonization targets. We also collaborate with customers on demand-side and e-mobility solutions that reduce the emissions associated with their energy use. This engagement is a direct component of our climate transition plan: our transition depends not only on decarbonizing generation but on the carbon intensity of what customers actually consume, which we can influence only through the products we offer and the information we provide. Customer-attributable Scope 3 emissions are reported under Category 3, fuel- and energy-related activities, which totalled 1,459,752 tCO2e in 2025 and arise from the electricity delivered through our distribution and retail businesses.

(5.11.9.6) Effect of engagement and measures of success

The carbon intensity of the electricity portfolio delivered to customers has fallen as the renewable share of our generation has increased. Our Scope 2 emissions fell from 252,576 tCO2e in 2024 to 159,270 tCO2e in 2025, ahead of our interim milestone of 195,207 tCO2e, and our combined Scope 1 and fuel- and energy-related Scope 3 intensity fell to 0.26 tCO2e/MWh against a 2025 milestone of 0.29. We measure success on three metrics: the carbon intensity of electricity supplied, the volume of renewable electricity sold under guarantee of origin certificates, and the number of commercial and industrial customers with whom we have agreed decarbonization-linked supply arrangements. These were chosen because they are the outcomes we can actually influence through customer engagement, as distinct from our own operational emissions.

Forests

(5.11.9.1) Type of stakeholder

Select from:

☑ Other value chain stakeholder, please specify :Local communities, environmental organizations and government agencies

(5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Share information on environmental initiatives, progress and achievements

Innovation and collaboration

☑ Collaborate with stakeholders on innovations to reduce environmental impacts in products and services

☑ Encourage collaborative work in multi-stakeholder landscape towards initiatives for sustainable land-use goals

(5.11.9.3) % of stakeholder type engaged

Select from:

☑ 100%

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

Our forests-related engagement is with local communities, environmental organizations and government agencies rather than with customers, because our forests impact arises from land use around our generation and grid assets rather than from the products we sell. These stakeholders were selected because reforestation and land-use outcomes cannot be delivered by a single company on its own land. Site selection, species choice, planting seasons and long-term maintenance all require the participation of the communities living in the landscape and the agencies that manage it. We engage them through our Zero Carbon Footprint Forests programme, through consultation on the environmental impact assessment for each new project, and through sharing the findings of our biodiversity exposure analysis, which identifies Key Biodiversity Areas and legally designated protected areas near our operations. The engagement supports the commitments in our Deforestation Combat Policy, which sets a net positive impact on nature by 2035 and moves beyond zero net deforestation.

(5.11.9.6) Effect of engagement and measures of success

We had planted 692,000 saplings by the end of 2025, up from 690,000 in 2024 and 600,000 in 2023, against a target of 1.2 million by 2035. Our Net Positive Impact score improved from -2,650 in 2024 to -2,645 in 2025, with a target of reaching zero or better by 2035. Success is measured on three metrics: cumulative saplings planted and their survival rate, the movement of the Net Positive Impact score toward zero, and the absence of unresolved objections from communities or agencies during project consultation. Survival rate matters more than planting count, which is why maintenance is agreed with local partners rather than treated as a one-off event, and the NPI score is used because it captures the net effect of our land use rather than only the positive side of it.

Water

(5.11.9.1) Type of stakeholder

Select from:

☑ Customers

(5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Educate and work with stakeholders on understanding and measuring exposure to environmental risks

☑ Share information on environmental initiatives, progress and achievements

Innovation and collaboration

☑ Incentivize collaborative sustainable water management in river basins

(5.11.9.3) % of stakeholder type engaged

Select from:

☑ 76-99%

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

Water is material to our operations and to the communities that share the catchments we operate in. Our hydroelectric plants divert river flow, our geothermal plants abstract reservoir fluid in catchments classified as extremely high baseline water stress, and the Lüleburgaz steam plant depends on non-renewable groundwater. Customers of our steam and electricity supply therefore have an indirect interest in how we manage that water. We share our water performance and water footprint with customers and local stakeholders in the areas where we operate, including the results of our water footprint assessments verified against EN ISO 14046, and we incorporate their input into our double materiality process. For industrial steam customers at Lüleburgaz we work on the water efficiency of the supply arrangement itself, since condensate return reduces abstraction on our side and cost on theirs. We also participate in basin-level dialogue where our operations and customer operations draw on the same catchment. The scope of this engagement covers our electricity and steam customers.

(5.11.9.6) Effect of engagement and measures of success

Total water consumption fell from 110,644,987 tonnes in 2024 to 86,835,586 tonnes in 2025, against a target of 99,580,488 tonnes, and consumption in areas of high and extremely high water stress fell from 54,850,288 to 50,601,240 tonnes. We recovered and reused 155,589 tonnes of process and steam condensate during the year, of which 64,234 tonnes was at Lüleburgaz where the recovery is integral to the steam supply arrangement with customers. Success is measured on water withdrawal intensity, consumption in water-stressed catchments, and the volume of condensate recovered. Intensity was selected because it isolates efficiency from generation volume; the stressed-catchment metric was selected because a cubic meter saved in the Büyük Menderes basin is worth more than one saved elsewhere.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☑ Investors and shareholders

(5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Educate and work with stakeholders on understanding and measuring exposure to environmental risks

☑ Share information on environmental initiatives, progress and achievements

Innovation and collaboration

☑ Collaborate with stakeholders in creation and review of your climate transition plan

(5.11.9.3) % of stakeholder type engaged

Select from:

☑ 100%

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

☑ 100%

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

Investors and shareholders are financially exposed to our transition, both through the emissions of assets in which we hold equity without operational control and through the cost of capital consequences of our own climate performance. They were identified as a material stakeholder group in our double materiality analysis. Our exit from thermal generation, completed with the divestment of our remaining interest in an Israeli asset during 2025, was itself shaped by this exposure. Scope 3 Category 15 emissions were 27,154 tCO2e in 2025 against 1,906 tCO2e in 2024. The change is a reclassification rather than growth in emissions. Operational control of our electric vehicle charging business passed to our joint venture partner during the period while we retained a 49.99% interest, so those emissions moved out of Scope 1 and 2 and into Category 15. The 2024 figure related to our residual interest in a thermal generation asset that was divested during 2025 and now contributes nothing. The engagement is unusually direct in our case because our Sustainability-Linked Bond programme, which reached USD 1.1 billion and was the first of its kind issued from Türkiye, ties our coupon to SBTi-aligned key performance indicators including absolute Scope 3 reductions. Bondholders therefore have a contractual interest in our decarbonization performance rather than a purely reputational one. We disclose climate-related financial and emissions data, share our transition plan and its underlying scenario analysis, and incorporate investor feedback into capital allocation. We also discuss our internal carbon price of USD 70 to 110 per tonne and how it is applied in investment appraisal. This engagement is a condition of delivering our climate transition plan, because the plan requires capital and the terms on which we raise it depend on investor confidence in the trajectory.

(5.11.9.6) Effect of engagement and measures of success

Investor engagement has translated into financing terms that reward decarbonization. Reaching a total Sustainability-Linked Bond programme size of USD 1.1 billion, at a scale unprecedented for a Turkish issuer in this format, demonstrates that credible science-based commitments are priced favourably. Our planned generation investment to 2030 is directed to renewable capacity, and investor expectations were a factor in that allocation. Success is measured on three metrics: performance against the KPIs embedded in the bond, which carry a direct financial consequence; the share of our capital expenditure directed to renewable capacity; and investor participation in our ESG briefings. The first was selected because it is contractual rather than voluntary and therefore the least subjective measure of whether the

engagement is working. We also track Scope 3 Category 15 emissions, which stood at 27,154 tCO2e in 2025 following the transfer of operational control of our charging business to our joint venture partner, and which are the subject of continuing engagement with that partner on decarbonizing the asset.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☑ Other value chain stakeholder, please specify :Employees, government institutions, NGOs and academia

(5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Educate and work with stakeholders on understanding and measuring exposure to environmental risks

☑ Share information on environmental initiatives, progress and achievements

Innovation and collaboration

☑ Collaborate with stakeholders on implementing adaptation activities

☑ Engage with stakeholders to advocate for policy or regulatory change

(5.11.9.3) % of stakeholder type engaged

Select from:

☑ 100%

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

☑ 100%

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

We engage employees, government institutions, NGOs and academia because each holds a lever our transition depends on and none of them is a customer, supplier or investor. Employees implement the operational changes our targets require, so we deliver climate and sustainability training through Zorlu Akademi and embed

climate performance in executive remuneration. Government institutions set the framework we operate in: Türkiye's Climate Law No. 7552 and the Emissions Trading System regulation that followed it will determine the cost of carbon in our markets, and we engage on their design through sector associations. NGOs and academia provide technical expertise and collaborative platforms, and we work with them on biodiversity assessment, reforestation and adaptation planning. We also participated in the European Union Horizon 2020 GECO consortium as its only Turkish facility, working with research institutions on geothermal carbon capture and reinjection. The only Scope 3 emissions attributable to this stakeholder group are employee commuting, which totalled 6,494 tCO2e in 2025 under Category 7. All employees fall within the scope of this engagement, so the full amount is covered. Government institutions, NGOs and academia carry no attributable Scope 3 emissions.

(5.11.9.6) Effect of engagement and measures of success

Engagement has built internal capability and external alignment. Employees completed climate and sustainability training through Zorlu Akademi during the year, and collaboration with public institutions, NGOs and research bodies continued through the GECO project, our biodiversity and ecosystem risk assessment and our reforestation programme. Success is measured on employee training participation and completion rates, the number of active collaborations with institutions and NGOs, and the extent to which our positions are reflected in sector-level policy discussion. Training participation was selected because operational decarbonization is delivered by people rather than by policy documents, and the collaboration count because technical problems such as non-condensable gas capture are not solvable by a single company.
[Add row]

C6. Environmental performance - Consolidation approach

(6.1) Provide details on your chosen consolidation approach for the calculation of environmental performance data.

Climate change

(6.1.1) Consolidation approach used

Select from:

☑ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

In our organization, we adopt an operational control approach to consolidate our environmental performance data, ensuring that we account for all environmental impacts associated with our operations. This method allows us to attribute GHG emissions, water withdrawals, and other environmental impacts directly to the facilities and activities under our operational control, providing a clear view of our environmental footprint. Scope and Boundaries: We define the organizational boundaries based on the operational control model, which includes all facilities where we have the authority to introduce and implement operational policies. This ensures that we capture the full range of environmental impacts from our owned and operated facilities. Data Collection: Data is collected systematically from all relevant operations, leveraging established reporting protocols. We utilize a combination of metered data, estimated figures, and historical data to ensure a comprehensive overview of our environmental performance. Standardization and Consistency: To ensure consistency in our data reporting, we follow internationally recognized guidelines and standards, including the IFRS, GRI, GHG Protocol, and ISO 14064. This standardization allows for the comparability of our data over time and against industry benchmarks. Continuous Improvement: We are committed to continuously improving our data collection and reporting processes. Regular audits and reviews are conducted to validate our data and ensure accuracy. Additionally, we encourage feedback from stakeholders to refine our approach further. Transparency and Reporting: We transparently disclose our environmental performance data in our annual sustainability report and to relevant stakeholders, ensuring that users can interpret how these impacts relate to our business operations. By aligning our consolidation approach with recognized best practices, we aim to provide clear, actionable insights into our environmental performance and drive ongoing improvements.

Forests

(6.1.1) Consolidation approach used

Select from:

☑ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

In our organization, we adopt an operational control approach to consolidate our environmental performance data, ensuring that we account for all environmental impacts associated with our operations. This method allows us to attribute GHG emissions, water withdrawals, and other environmental impacts directly to the facilities and activities under our operational control, providing a clear view of our environmental footprint. Scope and Boundaries: We define the organizational boundaries based on the operational control model, which includes all facilities where we have the authority to introduce and implement operational policies. This ensures that we capture the full range of environmental impacts from our owned and operated facilities. Data Collection: Data is collected systematically from all relevant operations, leveraging established reporting protocols. We utilize a combination of metered data, estimated figures, and historical data to ensure a comprehensive overview of our environmental performance. Standardization and Consistency: To ensure consistency in our data reporting, we follow internationally recognized guidelines and standards, including the IFRS and GRI. This standardization allows for the comparability of our data over time and against industry benchmarks. Continuous Improvement: We are committed to continuously improving our data collection and reporting processes. Regular audits and reviews are conducted to validate our data and ensure accuracy. Additionally, we encourage feedback from stakeholders to refine our approach further. Transparency and Reporting: We transparently disclose our environmental performance data in our annual sustainability report and to relevant stakeholders, ensuring that users can interpret how these impacts relate to our business operations. By aligning our consolidation approach with recognized best practices, we aim to provide clear, actionable insights into our environmental performance and drive ongoing improvements.

Water

(6.1.1) Consolidation approach used

Select from:

☑ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

In our organization, we adopt an operational control approach to consolidate our environmental performance data, ensuring that we account for all environmental impacts associated with our operations. This method allows us to attribute GHG emissions, water withdrawals, and other environmental impacts directly to the facilities and activities under our operational control, providing a clear view of our environmental footprint. Scope and Boundaries: We define the organizational boundaries based on the operational control model, which includes all facilities where we have the authority to introduce and implement operational policies. This ensures that we capture the full range of environmental impacts from our owned and operated facilities. Data Collection: Data is collected systematically from all relevant operations, leveraging established reporting protocols. We utilize a combination of metered data, estimated figures, and historical data to ensure a comprehensive overview of our environmental performance. Standardization and Consistency: To ensure consistency in our data reporting, we follow internationally recognized guidelines and standards, including the IFRS, GRI, GHG Protocol, and ISO 14046. This standardization allows for the comparability of our data over time and against industry benchmarks. Continuous Improvement: We are committed to continuously improving our data collection and reporting processes. Regular audits and reviews are conducted to validate our data and ensure accuracy. Additionally, we encourage feedback from stakeholders to refine our approach further. Transparency and Reporting: We transparently disclose our environmental performance data in our annual sustainability report and to relevant stakeholders, ensuring that users can interpret how these impacts relate to our business operations. By aligning our consolidation approach with recognized best practices, we aim to provide clear, actionable insights into our environmental performance and drive ongoing improvements.

Biodiversity

(6.1.1) Consolidation approach used

Select from:

☑ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

In our organization, we adopt an operational control approach to consolidate our environmental performance data, ensuring that we account for all environmental impacts associated with our operations. This method allows us to attribute GHG emissions, water withdrawals, and other environmental impacts directly to the facilities and activities under our operational control, providing a clear view of our environmental footprint. Scope and Boundaries: We define the organizational boundaries based on the operational control model, which includes all facilities where we have the authority to introduce and implement operational policies. This ensures that we capture the full range of environmental impacts from our owned and operated facilities. Data Collection: Data is collected systematically from all relevant operations, leveraging established reporting protocols. We utilize a combination of metered data, estimated figures, and historical data to ensure a comprehensive overview of our environmental performance. Standardization and Consistency: To ensure consistency in our data reporting, we follow internationally recognized guidelines and standards, including the IFRS and GRI. This standardization allows for the comparability of our data over time and against industry benchmarks. Continuous Improvement: We are committed to continuously improving our data collection and reporting processes. Regular audits and reviews are conducted to validate our data and ensure accuracy. Additionally, we encourage feedback from stakeholders to refine our approach further. Transparency and Reporting: We transparently disclose our environmental performance data in our annual sustainability report and to relevant stakeholders, ensuring that users can interpret how these impacts relate to our business operations. By aligning our consolidation approach with recognized best practices, we aim to provide clear, actionable insights into our environmental performance and drive ongoing improvements.
[Fixed row]

C7. Environmental performance - Climate change

(7.1) Is this your first year of reporting emissions data to CDP?

Select from:
☑ No

(7.1.1) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?

(7.1.1.1) Has there been a structural change?

Select all that apply
☑ Yes, a divestment

(7.1.1.2) Name of organization(s) acquired, divested from, or merged with

Electrip Global Limited (including ZES Dijital Ticaret A.Ş. and ZES Solar Enerji Tedarik ve Ticaret A.Ş.); Gökçedağ Rüzgar Enerji Üretim A.Ş.; Dorad Energy Ltd.

(7.1.1.3) Details of structural change(s), including completion dates

1) Electrip Global Limited (including ZES Dijital Ticaret A.Ş. and ZES Solar Enerji Tedarik ve Ticaret A.Ş.). Zorlu Energy did not divest its equity interest and continues to hold 49.99%; however, management control passed to the other shareholder, Wren House Infrastructure, on 13 January 2023. These entities were removed from our Scope 1 and Scope 2 boundary from this reporting year and their emissions are now reported under Scope 3, Category 15 at 27,154.08 metric tons CO2e. 2) Gökçedağ Rüzgar Enerji Üretim A.Ş. (Gökçedağ Wind Power Plant, Bahçe, Osmaniye, Türkiye). Completion date: 29 December 2025. All shares held by Zorlu Energy were sold and transferred to Etimesgut Enerji Üretim ve Ticaret A.Ş., a wholly owned subsidiary of Rönesans Yenilenebilir Enerji Yatırım A.Ş., transferring both ownership and operational control of the plant to the acquirer. As Zorlu Energy retained operational control of the asset for all but the final two days of the reporting year, the plant's emissions are included in full in our reporting year figures: 147.96 metric tons CO2e in Scope 1, 268.60 metric tons CO2e in Scope 2 and 7,081.25 metric tons CO2e in Scope 3. The asset falls outside our inventory boundary from the 2026 reporting year onwards. 3) Dorad Energy Ltd. (combined-cycle natural gas power plant, Ashkelon, Israel). Completion date: 22 July 2025. Zorlu Energy's remaining 25% shareholding was sold in two tranches, 10% to the Phoenix Group and 15% to Ellomay Luzon Energy Infrastructures Ltd. Dorad was an equity-accounted associate that was not under Zorlu Energy's operational control, and its emissions were therefore reported under Scope 3, Category 15 (Investments) rather than Scope 1 or Scope 2. Following completion, Zorlu Energy has no remaining

electricity generation or sales activities in Israel, and the Scope 3, Category 15 emissions associated with this investment have been reduced to zero from the completion date.
[Fixed row]

(7.1.2) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?

(7.1.2.1) Change(s) in methodology, boundary, and/or reporting year definition?

Select all that apply

☑ Yes, a change in methodology

☑ Yes, a change in boundary

(7.1.2.2) Details of methodology, boundary, and/or reporting year definition change(s)

Three changes affected our inventory in the reporting year. Boundary: Electrip Global Limited and its subsidiaries, ZES Dijital Ticaret A.Ş. and ZES Solar Enerji Tedarik ve Ticaret A.Ş. (EV charging and solar businesses), were removed from our Scope 1 and Scope 2 boundary. We hold a 49.99% equity interest but not operational control, management control having passed to the other shareholder, Wren House Infrastructure, on 13 January 2023. These entities were within our Scope 1 and 2 inventory in previous years; their emissions are now reported under Scope 3, Category 15 at 27,154.08 metric tons CO2e. Emissions previously reported under Category 11 arose from ZES Solar panel sales and are likewise now captured under Category 15. The change reallocates emissions between scopes rather than removing them. See question 7.1.1. Methodology: We replaced the Turkish national average grid emission factor with independently verified region-specific factors for our Osmangazi operations. For OEDAŞ, this reduced reported Scope 2 emissions by 93,480 metric tons CO2e. For OEPSAŞ, a factor of 0.27 kg CO2e/kWh replaced 0.434 kg CO2e/kWh for electricity supplied to end users, reducing Scope 3, Category 3 by 865,353 metric tons CO2e. Combined effect: 958,833 metric tons CO2e. On a like-for-like basis Scope 2 was broadly unchanged and Category 3 fell by approximately 4%; these methodological changes, not operational reductions, drive most of the reported decrease. See question 7.1.3. Errors: The base year figure previously reported for Scope 3, Category 11 was 2,571,962.96 metric tons CO2e, which included end-use combustion emissions of gas distributed by our former gas distribution business. Our base year was recalculated to exclude these when that business was divested, giving 1,700.52 metric tons CO2e, but the restated figure was not carried through to our previous CDP response. Smaller discrepancies were also corrected across Scope 1, Scope 2 and Scope 3 Categories 1-6 and 15. All figures in question 7.5 now align with our validated base year inventory. Emissions from leased vehicles provided by our subsidiary E-WAY, previously allocated to the Scope 1 inventories of the facilities using them, are calculated and reported as a separate entity from this reporting year, contributing 2,784 metric tons CO2e to Scope 1.
[Fixed row]

(7.1.3) Have your organization’s base year emissions and past years’ emissions been recalculated as a result of any changes or errors reported in 7.1.1 and/or 7.1.2?

(7.1.3.1) Base year recalculation

Select from:

☑ Yes

(7.1.3.2) Scopes recalculated

Select all that apply

☑ Scope 1

☑ Scope 2, location-based

☑ Scope 2, market-based

☑ Scope 3

(7.1.3.3) Scope 3 categories recalculated

Select all that apply

☑ Investments

☑ Capital goods

☑ Business travel

☑ Use of sold products

☑ Purchased goods and services

☑ Waste generated in operations

☑ Upstream transportation and distribution

☑ Fuel and energy-related activities (not included in Scope 1or 2)

(7.1.3.4) Base year emissions recalculation policy, including significance threshold

Zorlu Energy applies a significance threshold of 5% for the recalculation of base year emissions, assessed against total base year emissions in the relevant scope and cumulatively across all changes occurring in a reporting year. The policy is applied consistently to both increases and decreases. Recalculation is triggered by structural changes affecting the inventory boundary, changes in calculation methodology or emission factors, and the discovery of significant errors, in line with Chapter 5 of the GHG Protocol Corporate Standard. Base year emissions have been recalculated this year as a result of the significant errors reported in question 7.1.2. The most material related to Scope 3, Category 11 (Use of sold products), where the base year figure previously reported still included the end-use combustion

emissions of natural gas distributed by our former gas distribution business. Our base year had been recalculated to exclude those emissions when that business was divested, but the restated figure had not been carried through into our previous CDP response. The correction reduces the base year figure for this category from 2,571,962.96 to 1,700.52 metric tons CO2e. Smaller discrepancies have also been corrected across Scope 1, Scope 2 and Scope 3 Categories 1, 2, 3, 4, 5, 6 and 15. All base year figures in question 7.5 now align with the validated base year inventory underpinning our SBTi-approved targets. A further recalculation remains outstanding. The methodological change reported in question 7.1.2, relating to the adoption of independently verified region-specific grid emission factors for our Osmangazi distribution and retail operations, has an effect of 958,833 metric tons CO2e on our reporting year figures, equivalent to 18.1% of base year emissions, and therefore exceeds our significance threshold. A region-specific emission factor study covering our base year and the intervening years is in progress but not yet complete, so the data required to restate prior years is not yet available. Base year and past years' emissions will be recalculated once the study is finalized, and the restated figures disclosed in our next CDP submission. Until then, our reported Scope 2 and Scope 3 Category 3 figures for the reporting year are not directly comparable with prior years on a like-for-like basis.

(7.1.3.5) Past years' recalculation

Select from:

☑ No

[Fixed row]

(7.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.

Select all that apply

☑ The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

☑ The Greenhouse Gas Protocol: Scope 2 Guidance

☑ The Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Standard

(7.3) Describe your organization's approach to reporting Scope 2 emissions.

(7.3.1) Scope 2, location-based

Select from:

☑ We are reporting a Scope 2, location-based figure

(7.3.2) Scope 2, market-based

Select from:

☑ We are reporting a Scope 2, market-based figure

(7.3.3) Comment

Our organization reports both location-based and market-based Scope 2 emissions. For both approaches, we apply the grid emission factor of the country in which the operation is located, in line with GHG Protocol guidance, with one exception. For our electricity distribution operations at Osmangazi Elektrik Dağıtım A.Ş., we apply an independently verified emission factor specific to the Osmangazi distribution region, which better reflects the generation mix associated with network losses in our licensed area than the national average factor. This methodological change is described in question 7.1.2. In our market-based calculations, we account for renewable energy certificates such as I-REC and YEK-G, which we procure and retire to support our decarbonization strategy. These instruments are incorporated into our emissions accounting to reflect the environmental attributes of renewable electricity procurement, thereby reducing our market-based Scope 2 emissions accordingly. No residual mix factor is published for Türkiye; where consumption is not covered by a contractual instrument, the applicable grid average factor is used. [Fixed row]

(7.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1, Scope 2 or Scope 3 emissions that are excluded from your disclosure of climate-related data?

Select from:

☑ Yes

(7.4.1) Provide details of the sources of Scope 1, Scope 2, or Scope 3 emissions which are not included in your disclosure.

Row 1

(7.4.1.1) Source of excluded emissions

Dead Sea Solar Power Plant (1.5 MW), Jericho, Palestine, operated by our subsidiary ZJ Strong Energy.

(7.4.1.2) Scope(s) or Scope 3 category(ies)

Select all that apply

☑ Scope 1

☑ Scope 2 (location-based)

☑ Scope 2 (market-based)

(7.4.1.3) Relevance of Scope 1 emissions from this source

Select from:

☑ Emissions are not relevant

(7.4.1.4) Relevance of location-based Scope 2 emissions from this source

Select from:

☑ Emissions are not relevant

(7.4.1.5) Relevance of market-based Scope 2 emissions from this source

Select from:

☑ Emissions are not relevant

(7.4.1.8) Estimated percentage of total Scope 1+2 emissions this excluded source represents

0.1

(7.4.1.10) Explain why this source is excluded

The Dead Sea Solar Power Plant is a 1.5 MW photovoltaic facility in Jericho, Palestine, and is our only operation in that geography. It falls within the organizational boundary defined by our operational control consolidation approach. Owing to the ongoing armed conflict in the region, we have been unable to obtain reliable activity data from the site for the reporting year, and site access and communication with local personnel have not been possible. We have therefore excluded the site from the emissions reported in questions 7.6, 7.7 and 7.8 rather than report unverified data. We have assessed the relevance of the excluded emissions and concluded that they are not relevant to users of this disclosure. As a photovoltaic generation facility, the site has no combustion sources and therefore no material Scope 1 emissions; its Scope 2 emissions are limited to auxiliary and parasitic loads at an installed capacity of 1.5 MW. The estimated Scope 1 and Scope 2 emissions of the site represent approximately 0.001% of our total gross global Scope 1 and Scope 2 emissions, far below the level at which the exclusion would affect the completeness or comparability of our inventory. The site is unstaffed for routine operation and does not give rise to material Scope 3 emissions. We will reinstate the site in our inventory as soon as conditions allow reliable data collection.

(7.4.1.11) Explain how you estimated the percentage of emissions this excluded source represents

Scope 1 emissions were assumed to be negligible, as photovoltaic generation involves no fuel combustion at the site. Scope 2 emissions were estimated using a benchmarking approach: we applied the Scope 1 and Scope 2 emissions of our Jhimpir wind power plant in Pakistan (56.4 MW; 76.45 metric tons CO2e Scope 1 and 172.35 metric tons CO2e Scope 2 in the reporting year) as a proxy for a comparable non-combustion renewable generation asset, scaled by installed capacity (1.5

MW / 56.4 MW). This yields an estimate of approximately 7 metric tons CO2e for Scope 1 and Scope 2 combined. Expressed against our total gross global Scope 1 and location-based Scope 2 emissions of 871,898 metric tons CO2e reported in questions 7.6 and 7.7, the excluded source represents approximately 0.001%. The location-based Scope 2 figure was used in this calculation; using the market-based figure produces the same result to the stated level of precision. We consider the confidence level of this estimate to be moderate, and it has not been verified by a third party. The approach is conservative, as a wind asset has higher auxiliary consumption per MW of installed capacity than a photovoltaic asset of comparable size.
[Add row]

(7.5) Provide your base year and base year emissions.

Scope 1

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

1087685.26

(7.5.3) Methodological details

Scope 1 emissions were calculated in accordance with the GHG Protocol Corporate Standard and ISO 14064-1, using the operational control consolidation approach. The inventory covers stationary combustion, mobile combustion (on-road and off-road) and fugitive emissions across all facilities under our operational control in the base year, including our geothermal, hydroelectric, wind and natural gas generation assets, our electricity distribution and retail operations, and our EV charging and solar businesses. Activity data were collected from metered fuel purchase and consumption records, refrigerant top-up logs, and geothermal non-condensable gas measurements at each site. Emission factors for fuel combustion are the IPCC 2006 Guidelines default factors (for example 74,100 kg CO2/TJ for diesel, 69,300 kg CO2/TJ for gasoline and 56,100 kg CO2/TJ for natural gas), applied to consumption converted to terajoules using fuel density and net calorific values. Global warming potentials are taken from the IPCC Sixth Assessment Report (100-year values, including 27.9 for fossil methane and 273 for nitrous oxide). The dominant source of Scope 1 emissions is fugitive carbon dioxide and methane released with the geothermal fluid at our Kızıldere and Alaşehir geothermal power plants. These emissions are quantified from measured non-condensable gas content in the flash steam, expressed on a mass basis and multiplied by the applicable global warming potentials, rather than estimated from generic factors. This reflects the fact that geothermal fluid composition is highly site-specific and generic factors would not give a representative result. 2021 was selected as the base year because it is the earliest year for which a complete, third-party verified inventory covering all three scopes is available, and it is the base year validated by the Science Based Targets initiative for our approved targets. The base year figure has been recalculated following the divestment of our natural gas distribution business, in accordance with Chapter 5 of the GHG Protocol Corporate Standard, so that the base year reflects the same organizational boundary as our current inventory. Emissions from Electrip Global Limited and its subsidiaries, including our EV charging and solar businesses, remain included within the base year figure, as these entities were under our operational control in 2021.

Scope 2 (location-based)

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

240009.82

(7.5.3) Methodological details

Scope 2 location-based emissions were calculated in accordance with the GHG Protocol Scope 2 Guidance and cover purchased electricity consumed at all facilities under our operational control, together with technical and non-technical losses on the Osmangazi distribution network for which we are responsible as the licensed distribution operator. Activity data are metered electricity consumption in kilowatt-hours, taken from utility invoices and, for network losses, from the settlement data of the Turkish electricity market operator. The national average Turkish grid emission factor applicable to the base year, 0.43 kg CO2e/kWh, was applied uniformly to all consumption in Türkiye; grid factors published by the respective national authorities were used for consumption in Pakistan. The national average factor was used because region-specific grid factors were not available for 2021. Network losses at Osmangazi Elektrik Dağıtım A.Ş. are the largest single component of this figure, reflecting the scale of electricity distributed rather than on-site consumption. 2021 was selected as the base year for the reasons set out for Scope 1. The base year figure for Scope 2 has likewise been recalculated to remove the electricity consumption of our former natural gas distribution business, consistent with the treatment applied to Scope 1 and Scope 3.

Scope 2 (market-based)

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

240009.82

(7.5.3) Methodological details

Zorlu Energy held no contractual instruments such as renewable energy certificates in the base year, and no residual mix factor is published for Türkiye. In line with the GHG Protocol Scope 2 Guidance, the grid average emission factor was therefore applied for the market-based calculation, and the market-based figure is

consequently identical to the location-based figure for the base year. The same activity data, emission factor and boundary described for the location-based row apply. From 2022 onwards the two figures differ, reflecting the I-REC and YEK-G certificates retired against our own consumption.

Scope 3 category 1: Purchased goods and services

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

62711.14

(7.5.3) Methodological details

Emissions from purchased goods and services were calculated using the average-data method described in the GHG Protocol Corporate Value Chain (Scope 3) Standard. Activity data are the physical quantities of purchased materials in kilograms, disaggregated by material type, extracted from our procurement records. Emission factors specific to each material type are taken from the UK DEFRA Greenhouse Gas Reporting: Conversion Factors dataset for the base year. A physical, material-based approach was selected in preference to a spend-based approach because it is less sensitive to price fluctuation and currency movement and gives a more accurate representation of the emissions embodied in our purchases. Supplier-specific emissions data were not available across our supply base in the base year. 2021 is the base year for this category as it is the first year for which the category was calculated and verified by a third party.

Scope 3 category 2: Capital goods

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

665.64

(7.5.3) Methodological details

Emissions from capital goods were calculated using a spend-based approach applied to capital expenditure recorded in the reporting year, using UK DEFRA Greenhouse Gas Reporting: Conversion Factors. Capital expenditure data were taken from our fixed asset additions register. The figure is small relative to other categories because capital investment in the base year was concentrated in renewable generation assets with long asset lives, for which embodied emissions are

recognised in the year of acquisition rather than amortised. 2021 is the base year for this category as it is the first year for which it was calculated and verified by a third party.

Scope 3 category 3: Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

3318497.05

(7.5.3) Methodological details

This category covers well-to-tank emissions associated with the extraction, production and transport of fuels consumed in our Scope 1 inventory, well-to-tank and transmission and distribution emissions associated with purchased electricity in our Scope 2 inventory, and the generation emissions of electricity purchased for resale to end customers by our retail business, Osmangazi Elektrik Perakende Satış A.Ş. Activity data are the same metered fuel and electricity quantities used for Scopes 1 and 2, together with volumes of electricity purchased for resale from the settlement data of the Turkish electricity market operator. Well-to-tank and transmission and distribution factors are taken from the UK DEFRA Greenhouse Gas Reporting: Conversion Factors dataset; generation emissions for electricity purchased for resale were calculated using the national average Turkish grid emission factor applicable to the base year. This is by a substantial margin our largest Scope 3 category, driven by the volume of electricity sold by our retail business. 2021 is the base year for this category as it is the first year for which it was calculated and verified by a third party.

Scope 3 category 4: Upstream transportation and distribution

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

59284.85

(7.5.3) Methodological details

This category covers well-to-wheel emissions from the inbound transportation of purchased goods to Zorlu Energy. Emissions were calculated using the distance-based method described in the GHG Protocol Corporate Value Chain (Scope 3) Standard. For each consignment, the road distance between the supplier's location and the receiving Zorlu Energy warehouse was determined using mapping tools, and combined with consignment weight to derive tonne-kilometres. Emission factors by vehicle type and load factor are taken from the UK DEFRA Greenhouse Gas Reporting: Conversion Factors dataset and include both tank-to-wheel and well-to-tank components. A distance-based approach was selected because carrier-specific fuel consumption data were not available from our logistics providers. 2021 is the base year for this category as it is the first year for which it was calculated and verified by a third party.

Scope 3 category 5: Waste generated in operations

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

2083.35

(7.5.3) Methodological details

Emissions from waste were calculated using a waste-type-specific method, applying emission factors that reflect both the type of waste and its treatment route. Activity data are the quantities of hazardous and non-hazardous waste recorded in our licensed waste transfer documentation, disaggregated by disposal method (recycling, recovery, incineration and landfill). Emission factors are taken from the UK DEFRA Greenhouse Gas Reporting: Conversion Factors dataset. 2021 is the base year for this category as it is the first year for which it was calculated and verified by a third party.

Scope 3 category 6: Business travel

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

9657.97

(7.5.3) Methodological details

This category covers emissions from air travel, intercity road travel, short-term vehicle rental and hotel accommodation associated with business travel by Zorlu Energy employees. Activity data comprise passenger-kilometres and journey records obtained from our corporate travel agency and expense management system, and rental days and distances from vehicle rental providers. Emission factors are taken from the UK DEFRA Greenhouse Gas Reporting: Conversion Factors dataset, applied by travel mode, cabin class and haul length, and include radiative forcing uplift for air travel. 2021 is the base year for this category as it is the first year for which it was calculated and verified by a third party.

Scope 3 category 7: Employee commuting

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

10012.09

(7.5.3) Methodological details

Employee commuting at our sites is provided predominantly through company-organised scheduled buses and minibuses, with a smaller share of private vehicle and public transport use. Activity data comprise route distances and service frequencies for company-organised transport, and commuting mode and distance data collected from employees, extrapolated to the full workforce by site. Emission factors are taken from the UK DEFRA Greenhouse Gas Reporting: Conversion Factors dataset by vehicle type and occupancy. Homeworking emissions were not included, as remote working was not a material component of our working pattern in the base year. 2021 is the base year for this category as it is the first year for which it was calculated and verified by a third party.

Scope 3 category 8: Upstream leased assets

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

This category is reported as zero. All assets leased by Zorlu Energy in the base year, including leased vehicles and leased office space, were under our operational control and their emissions are therefore already accounted for within our Scope 1 and Scope 2 inventory. Reporting them separately in this category would result in double counting.

Scope 3 category 9: Downstream transportation and distribution

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

240.55

(7.5.3) Methodological details

This category covers emissions from the transport and distribution of products sold by Zorlu Energy where the transport is not paid for by us, principally the delivery of solar panels and related equipment sold by our solar business to customers. Activity data comprise delivery distances and consignment weights from our sales and dispatch records, with emission factors taken from the UK DEFRA Greenhouse Gas Reporting: Conversion Factors dataset. The figure is small because the majority of our output is electricity, which is delivered through the grid and accounted for elsewhere. 2021 is the base year for this category as it is the first year for which it was calculated and verified by a third party.

Scope 3 category 10: Processing of sold products

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

This category is reported as zero and is not applicable to our activities. Our principal products are electricity, steam and, in the base year, distributed natural gas, none of which undergo further processing by an intermediate customer before reaching the end user. Equipment sold by our solar business is supplied in finished form and requires installation rather than processing.

Scope 3 category 11: Use of sold products

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

1700.52

(7.5.3) Methodological details

This category covers direct use-phase emissions from products sold by Zorlu Energy that consume energy when used. In the base year the category comprised the use-phase emissions of solar panels and associated equipment sold and installed by ZES Solar Enerji Tedarik ve Ticaret A.Ş., which was under our operational control in 2021. Activity data comprise the quantities of equipment sold, with expected annual energy consumption per unit and assumed product lifetimes applied to derive lifetime use-phase emissions, using UK DEFRA Greenhouse Gas Reporting: Conversion Factors. The base year figure for this category has been recalculated. It previously included the end-use combustion emissions of natural gas distributed by our natural gas distribution business. Following the divestment of that business, the base year was recalculated to remove those emissions, in accordance with Chapter 5 of the GHG Protocol Corporate Standard, so that the base year reflects the same organizational boundary as our current inventory and remains directly comparable with it. The recalculated base year figure is consistent with the base year inventory underpinning our Science Based Targets initiative approved targets. 2021 remains the base year for this category, being the first year for which it was calculated and verified by a third party.

Scope 3 category 12: End of life treatment of sold products

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

340.12

(7.5.3) Methodological details

This category covers emissions from the waste treatment and disposal of products sold by Zorlu Energy at the end of their useful life, principally solar panels, inverters and related equipment. Activity data comprise the mass of products sold by material type, with assumed end-of-life treatment routes based on prevailing national recovery and disposal practices. Emission factors are taken from the UK DEFRA Greenhouse Gas Reporting: Conversion Factors dataset. Electricity, steam

and distributed gas have no end-of-life treatment stage. 2021 is the base year for this category as it is the first year for which it was calculated and verified by a third party.

Scope 3 category 13: Downstream leased assets

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

This category is reported as zero. Zorlu Energy did not lease any assets it owns to third parties in the base year, and therefore no emissions arise under this category.

Scope 3 category 14: Franchises

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

This category is reported as zero and is not applicable to our activities. Zorlu Energy does not operate a franchise model and has no franchisees.

Scope 3 category 15: Investments

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

518331.08

(7.5.3) Methodological details

This category covers emissions from equity investments over which Zorlu Energy does not hold operational control and which therefore fall outside our Scope 1 and Scope 2 inventory. In the base year the category comprised principally our shareholding in Dorad Energy Ltd., a combined-cycle natural gas power plant in Ashkelon, Israel. Emissions were calculated using the average-data method described in the GHG Protocol Corporate Value Chain (Scope 3) Standard, applying our proportional equity share to the investee's activity, using revenue information and an average emission factor appropriate to combined-cycle natural gas generation. This approach was adopted because, as a non-controlling shareholder, we did not have access to the investee's primary activity data. 2021 is the base year for this category as it is the first year for which it was calculated and verified by a third party.
[Fixed row]

(7.6) What were your organization’s gross global Scope 1 emissions in metric tons CO2e?

Reporting year

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

709340

(7.6.3) Methodological details

Scope 1 emissions were calculated in accordance with the GHG Protocol Corporate Standard and ISO 14064-1, using the operational control consolidation approach. The inventory covers stationary combustion, mobile combustion (on-road and off-road) and fugitive emissions at all facilities under our operational control, comprising our geothermal, hydroelectric, wind and natural gas generation assets, our electricity distribution and retail operations, and our vehicle fleet operations. Activity data were collected from metered fuel purchase and consumption records, refrigerant top-up logs, and geothermal non-condensable gas measurements at each site. Emission factors for fuel combustion are the IPCC 2006 Guidelines default factors (74,100 kg CO2/TJ for diesel, 69,300 kg CO2/TJ for gasoline and 56,100 kg CO2/TJ for natural gas), applied to consumption converted to terajoules using fuel density and net calorific values. Global warming potentials are taken from the IPCC Sixth Assessment Report (100-year values, including 27.9 for fossil methane and 273 for nitrous oxide). Fugitive carbon dioxide and methane released with the geothermal fluid at our Kızıldere and Alaşehir geothermal power plants account for the majority of this figure. These emissions are quantified from measured non-condensable gas content in the flash steam, expressed on a mass basis and multiplied by the applicable global warming potentials, rather than estimated using generic factors, because geothermal fluid composition is highly site-specific. Our Lüleburgaz coal-fired steam facility is the principal source of stationary combustion

emissions. Two changes affect the comparability of this figure with prior years. Electrip Global Limited and its subsidiaries are no longer within our Scope 1 boundary, as we do not hold operational control of these entities; this is described in questions 7.1.1 and 7.1.2. Emissions from leased vehicles provided by our subsidiary E-WAY, previously allocated to the Scope 1 inventories of the facilities using them, are reported as a separate entity from this reporting year onwards; this boundary change is described in question 7.1.2. The Gökçedağ wind power plant, divested on 29 December 2025, is included for the full reporting year, as we retained operational control of the asset for all but the final two days of the year. The Dead Sea Solar Power Plant in Jericho, Palestine, is excluded for the reasons set out in question 7.4.1.

Past year 1

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

714385

(7.6.2) End date

12/31/2024

(7.6.3) Methodological details

Emissions for this year were calculated on the same basis as the reporting year, using the GHG Protocol Corporate Standard and the operational control consolidation approach, with IPCC 2006 default combustion factors and IPCC Sixth Assessment Report global warming potentials. This figure is as previously reported to CDP and in our Integrated Annual Report, and has not been restated; as set out in question 7.1.3, we have recalculated our base year but have not restated past years. It includes Electrip Global Limited and its subsidiaries within the Scope 1 boundary, which are excluded from the reporting year figure for the reasons described in questions 7.1.1 and 7.1.2, and is therefore not directly comparable with the reporting year figure.
[Fixed row]

(7.7) What were your organization’s gross global Scope 2 emissions in metric tons CO2e?

Reporting year

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

162558

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

159348

(7.7.4) Methodological details

Scope 2 emissions were calculated in accordance with the GHG Protocol Scope 2 Guidance and cover purchased electricity consumed at all facilities under our operational control, together with technical and non-technical losses on the Osmangazi distribution network for which we are responsible as the licensed distribution operator. Activity data are metered electricity consumption in kilowatt-hours, taken from utility invoices and, for network losses, from the settlement data of the Turkish electricity market operator. CH4 and N2O emissions are included within the emission factors applied. Location-based figure: for our electricity distribution operations at Osmangazi Elektrik Dağıtım A.Ş. we applied an emission factor specific to the Osmangazi distribution region, developed through a dedicated study and independently verified before use. This replaces the Turkish national average grid factor applied in previous years and provides a more accurate representation of the generation mix associated with network losses in our licensed area. This methodological change reduced our reported Scope 2 emissions by 93,480 metric tons CO2e relative to the previous methodology, and is described in question 7.1.2. For all other operations in Türkiye the national average grid factor was applied, and grid factors published by the respective national authorities were used for our operations in Pakistan. Market-based figure: we retired renewable energy certificates, comprising YEK-G certificates issued under the Turkish national scheme and I-REC certificates, against consumption at our own facilities. Our Lüleburgaz facility accounts for the majority of the difference between the two figures, where certificate retirement reduces market-based emissions to zero against a location-based figure of 2,534.82 metric tons CO2e. No residual mix factor is published for Türkiye; consumption not covered by a contractual instrument is therefore accounted for using the applicable grid average factor, consistent with the location-based approach. Two changes affect the comparability of these figures with prior years. Electrip Global Limited and its subsidiaries, including our EV charging operations, are no longer within our Scope 2 boundary, as we do not hold operational control of these entities; this is described in questions 7.1.1 and 7.1.2. The Gökçedağ wind power plant, divested on 29 December 2025, is included for the full year.

Past year 1

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

255401

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

252576

(7.7.3) End date

12/31/2024

(7.7.4) Methodological details

Emissions for this year were calculated on the same basis as the reporting year, in accordance with the GHG Protocol Scope 2 Guidance, and cover purchased electricity consumed at facilities under our operational control together with technical and non-technical losses on the Osmangazi distribution network. The Turkish national average grid emission factor was applied to all consumption in Türkiye, including Osmangazi network losses; the region-specific factor described for the reporting year was not yet available and has not been applied retrospectively. This figure is therefore not directly comparable with the reporting year figure on a like-for-like basis, as explained in questions 7.1.2 and 7.1.3. The market-based figure reflects the retirement of YEK-G and I-REC certificates against consumption at our own facilities. This figure is as previously reported to CDP and in our Integrated Annual Report and has not been restated. It includes Electrip Global Limited and its subsidiaries within the Scope 2 boundary, which are excluded from the reporting year figure.
[Fixed row]

(7.8) Account for your organization’s gross global Scope 3 emissions, disclosing and explaining any exclusions.

Purchased goods and services

(7.8.1) Evaluation status

Select from:
☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

53158

(7.8.3) Emissions calculation methodology

Select all that apply
☑ Average data method
☑ Supplier-specific method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

3

(7.8.6) Please explain

This category covers cradle-to-gate emissions of goods and services purchased by Zorlu Energy, and from this reporting year also includes capital goods, which are reported here rather than under Category 2 because our procurement data is not disaggregated between operational and capital purchases. Emissions were calculated using the average-data method, applying material-specific emission factors from the UK DEFRA Greenhouse Gas Reporting: Conversion Factors dataset to the physical quantities of purchased materials in kilograms, disaggregated by material type and extracted from our procurement records. Where suppliers provided product-specific emissions data, the supplier-specific method was applied in preference. Global warming potentials are taken from the IPCC Sixth Assessment Report. The increase relative to the previous year reflects higher procurement volumes associated with our renewable capacity expansion and the inclusion of capital goods in this category. Scope 1 and Scope 2 emissions are subject to third-party limited assurance; Scope 3 categories are calculated using the same data management system and internal controls.

Capital goods

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

Select from:

☑ Emissions covered under another scope 3 category, please specify :Category 1: Purchased goods and services

(7.8.6) Please explain

Emissions associated with capital goods are not reported separately in this category because they are already included within Scope 3, Category 1. Our procurement data is captured on a physical, material-type basis and is not disaggregated between operational and capital purchases; applying material-specific emission factors to the full set of purchased materials therefore captures capital goods within the Category 1 figure. Reporting a separate figure in this category would result in double counting. This treatment is consistent with the GHG Protocol Corporate Value Chain (Scope 3) Standard, which permits capital goods to be categorised under Category 1 depending on the calculation method applied.

Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

1459752

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

This category covers well-to-tank emissions of fuels consumed in our Scope 1 inventory, well-to-tank and transmission and distribution emissions associated with purchased electricity in our Scope 2 inventory, and the generation emissions of electricity purchased for resale to end customers by our retail business, Osmangazi Elektrik Perakende Satış A.Ş. Activity data are the same metered fuel and electricity quantities used for Scopes 1 and 2, together with volumes of electricity purchased for resale taken from the settlement data of the Turkish electricity market operator. Well-to-tank and transmission and distribution factors are from the UK DEFRA Greenhouse Gas Reporting: Conversion Factors dataset; global warming potentials are from the IPCC Sixth Assessment Report. In the reporting year we applied a region-specific emission factor of 0.27 kg CO2e/kWh to electricity purchased and supplied by OEPSAŞ, replacing the previously applied factor of 0.434 kg CO2e/kWh. This factor was developed through a dedicated study and independently verified before use. The change reduced reported emissions in this category by 865,353 metric tons CO2e and accounts for the majority of the year-on-year decrease; on a like-for-like basis emissions in this category fell by approximately 4%. This methodological change is described in question 7.1.2.

Upstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

16364

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Distance-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

This category covers well-to-wheel emissions from the inbound transportation of purchased goods to Zorlu Energy. Emissions were calculated using the distance-based method: for each consignment, the road distance between the supplier's location and the receiving Zorlu Energy warehouse was determined using mapping tools and combined with consignment weight to derive tonne-kilometres. Emission factors by vehicle type and load factor are from the UK DEFRA Greenhouse Gas Reporting: Conversion Factors dataset and include both tank-to-wheel and well-to-tank components; global warming potentials are from the IPCC Sixth Assessment Report. A distance-based approach was selected because carrier-specific fuel consumption data are not available from our logistics providers. The substantial increase relative to the previous year reflects a significant improvement in the granularity and completeness of our data rather than a change in transportation activity: from this reporting year we track the inbound transportation of each individual purchased item, whereas previous calculations covered only a limited subset of consignments for which records were readily available. This reporting year figure therefore represents a materially more complete account of emissions in this category, and is not directly comparable with the figure reported for the previous year.

Waste generated in operations

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

183

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Waste-type-specific method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

Emissions were calculated using the waste-type-specific method, applying emission factors that reflect both the type of waste and its treatment route. Activity data are the quantities of hazardous and non-hazardous waste recorded in our licensed waste transfer documentation and MoTAT records, disaggregated by disposal method (recycling and reuse, energy recovery, incineration without energy recovery, landfill and other disposal). Emission factors are from the UK DEFRA Greenhouse Gas Reporting: Conversion Factors dataset; global warming potentials are from the IPCC Sixth Assessment Report. Waste quantities are within the scope of our third-party limited assurance. The increase relative to the previous year reflects an expansion of the boundary of this category: fly ash arising from our Lüleburgaz combined heat and power plant, amounting to 30,563 tonnes in the reporting year, has been incorporated into the inventory for this category and was not included in previous years. Emissions in this category remain low relative to the volume of waste generated because 98.75% of our waste is recycled or recovered rather than sent to landfill.

Business travel

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

346

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Distance-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

This category covers well-to-wheel emissions from air travel, intercity road travel, short-term vehicle rental and hotel accommodation associated with business travel by Zorlu Energy employees. Emissions were calculated using the distance-based method, applying passenger-kilometres and journey records obtained from our corporate travel agency and expense management system, together with rental days and distances from vehicle rental providers. Emission factors are from the UK DEFRA Greenhouse Gas Reporting: Conversion Factors dataset, applied by travel mode, cabin class and haul length, and include radiative forcing uplift for air travel; global warming potentials are from the IPCC Sixth Assessment Report. The reduction relative to the previous year is driven by a decrease in international air travel, which carries a substantially higher emissions intensity per journey than domestic travel, together with the narrowing of our international footprint following our exit from operations in Israel.

Employee commuting

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

6494

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Distance-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

This category covers well-to-wheel emissions from employee commuting. Commuting at our sites is provided predominantly through company-organised scheduled buses and minibuses, with a smaller share of private vehicle and public transport use. Emissions were calculated using the distance-based method, applying route distances and service frequencies for company-organised transport and commuting mode and distance data collected from employees, extrapolated to the full workforce by site. Emission factors by vehicle type and occupancy are from the UK DEFRA Greenhouse Gas Reporting: Conversion Factors dataset; global warming potentials are from the IPCC Sixth Assessment Report. Homeworking emissions are not included, as our operational workforce is predominantly site-based. The increase relative to the previous year reflects the introduction of additional company-organised shuttle services for employees at our sites, extending coverage to routes previously served by private vehicle.

Upstream leased assets

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

Select from:

☑ Emissions covered under scope 1 or 2

(7.8.6) Please explain

All assets leased by Zorlu Energy, including leased vehicles and leased office space, are under our operational control. Under the operational control consolidation approach their emissions are already accounted for within our Scope 1 and Scope 2 inventory, and reporting them in this category would result in double counting. Emissions from leased vehicles provided by our subsidiary E-WAY are reported within Scope 1.

Downstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

Select from:

☑ Emissions covered under another scope 3 category, please specify :Category 3: Fuel-and-energy-related activities

(7.8.6) Please explain

Our principal products are electricity and steam, which are delivered to customers through the transmission and distribution network rather than by physical transport. Emissions associated with transmission and distribution losses on electricity delivered to end customers are accounted for within Scope 3, Category 3, and losses on the Osmangazi distribution network for which we are the licensed operator are accounted for within our Scope 2 inventory. Following the transfer of operational

control of our solar solutions business, we no longer sell physical products requiring outbound transportation. There are therefore no emissions in this category that are not already captured elsewhere in our inventory.

Processing of sold products

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

Select from:

☑ Not applicable to our organization’s activities

(7.8.6) Please explain

Our products are electricity and steam, which are supplied in final form to end users and do not undergo further processing by an intermediate customer before consumption. This category is therefore not applicable to our activities.

Use of sold products

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

Select from:

☑ Not applicable to our organization’s activities

(7.8.6) Please explain

Our products are electricity and steam. In line with the GHG Protocol Corporate Value Chain (Scope 3) Standard, electricity does not give rise to direct use-phase emissions: emissions arise at the point of generation and are accounted for within our Scope 1 inventory, while for our customers the consumption of that electricity constitutes their own Scope 2 emissions. Reporting these emissions in this category would result in double counting within our own inventory. Emissions previously reported in this category arose from solar panels sold and installed by ZES Solar Enerji Tedarik ve Ticaret A.Ş.; following the transfer of operational control of that business, the associated emissions are now accounted for within Scope 3, Category 15. Zorlu Energy no longer distributes natural gas or any other fossil fuel product following the divestment of its gas distribution business.

End of life treatment of sold products

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

Select from:

☑ Not applicable to our organization’s activities

(7.8.6) Please explain

Electricity and steam have no physical end-of-life stage and generate no waste requiring treatment or disposal at the point of consumption. Emissions previously reported in this category related to solar panels and associated equipment sold by our solar solutions business; following the transfer of operational control of that business, we no longer sell physical products with an end-of-life stage. This category is therefore not applicable to our activities in the reporting year.

Downstream leased assets

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

Select from:

☑ Not applicable to our organization’s activities

(7.8.6) Please explain

Zorlu Energy does not lease any assets that it owns to third parties. This category is therefore not applicable to our activities.

Franchises

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

Select from:

☑ Not applicable to our organization’s activities

(7.8.6) Please explain

Zorlu Energy does not operate a franchise model and has no franchisees. This category is therefore not applicable to our activities.

Investments

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

27154

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

This category covers emissions from equity investments over which Zorlu Energy does not hold operational control and which therefore fall outside our Scope 1 and Scope 2 inventory. In the reporting year the category comprises our 49.99% interest in Electrip Global Limited and its subsidiaries, which operate electric vehicle charging and solar solutions businesses in Türkiye and Europe. Emissions were calculated using the average-data method described in the GHG Protocol Corporate Value Chain (Scope 3) Standard, applying our proportional equity share to the investee's activity using revenue information and average emission factors appropriate to the activities concerned. This approach was adopted because, as a non-controlling shareholder, we do not have access to the investee's primary activity data. The increase relative to the previous year reflects the treatment of the Electrip group in this category rather than within Scope 1 and Scope 2, as described in questions 7.1.1 and 7.1.2, and does not represent an increase in emitting activity. Our remaining 25% interest in Dorad Energy Ltd., previously reported in this category, was divested on 22 July 2025 and the associated emissions have been reduced to zero from the completion date.
[Fixed row]

(7.8.1) Disclose or restate your Scope 3 emissions data for previous years.

Past year 1

(7.8.1.1) End date

12/31/2024

(7.8.1.2) Scope 3: Purchased goods and services (metric tons CO2e)

35123

(7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

3044

(7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

2420733

(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)

93

(7.8.1.6) Scope 3: Waste generated in operations (metric tons CO2e)

14

(7.8.1.7) Scope 3: Business travel (metric tons CO2e)

863

(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)

4731

(7.8.1.12) Scope 3: Use of sold products (metric tons CO2e)

10431

(7.8.1.16) Scope 3: Investments (metric tons CO2e)

1906
[Fixed row]

(7.9) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	*Select from:*

	Verification/assurance status
	☑ Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	*Select from:* ☑ Third-party verification or assurance process in place
Scope 3	*Select from:* ☑ Third-party verification or assurance process in place

[Fixed row]

(7.9.1) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.

Row 1

(7.9.1.1) Verification or assurance cycle in place

Select from:
☑ Annual process

(7.9.1.2) Status in the current reporting year

Select from:
☑ Complete

(7.9.1.3) Type of verification or assurance

Select from:
☑ Limited assurance

(7.9.1.4) Attach the statement

Zorlu Enerji Limited Assurance_311225.pdf,Zorlu Enerji Integrated Annual Report 2025.pdf

(7.9.1.5) Page/section reference

KPMG Independent Limited Assurance Report, 11 March 2026: page 1 (scope, "GHG emissions (Scope 1 and Scope 2)" under Selected Information); page 2 (Our responsibilities, ISAE 3000 and ISAE 3410); page 3 (Conclusion). The report is reproduced in our 2025 Integrated Annual Report at pages 262-265, and the assured Scope 1 figure is disclosed in the Environmental Performance Indicators section at page 407.

(7.9.1.6) Relevant standard

Select all that apply

☑ ISAE3000

☑ ISAE 3410

(7.9.1.7) Proportion of reported emissions verified (%)

100
[Add row]

(7.9.2) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.

Row 1

(7.9.2.1) Scope 2 approach

Select from:

☑ Scope 2 market-based

(7.9.2.2) Verification or assurance cycle in place

Select from:

☑ Annual process

(7.9.2.3) Status in the current reporting year

Select from:

☑ Complete

(7.9.2.4) Type of verification or assurance

Select from:

☑ Limited assurance

(7.9.2.5) Attach the statement

Zorlu Enerji Limited Assurance_311225.pdf,Zorlu Enerji Integrated Annual Report 2025.pdf

(7.9.2.6) Page/ section reference

KPMG Independent Limited Assurance Report, 11 March 2026: page 1 (scope, "GHG emissions (Scope 1 and Scope 2)" under Selected Information); page 2 (Our responsibilities, ISAE 3000 and ISAE 3410); page 3 (Conclusion). The report is reproduced in our 2025 Integrated Annual Report at pages 262-265, and the assured Scope 1 figure is disclosed in the Environmental Performance Indicators section at page 407.

(7.9.2.7) Relevant standard

Select all that apply

☑ ISAE3000

☑ ISAE 3410

(7.9.2.8) Proportion of reported emissions verified (%)

100

[Add row]

(7.9.3) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.

Row 1

(7.9.3.1) Scope 3 category

Select all that apply

- ☑ Scope 3: Investments
- ☑ Scope 3: Business travel
- ☑ Scope 3: Employee commuting
- ☑ Scope 3: Purchased goods and services
- ☑ Scope 3: Waste generated in operations
- ☑ Scope 3: Upstream transportation and distribution
- ☑ Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2)

(7.9.3.2) Verification or assurance cycle in place

Select from:

☑ Annual process

(7.9.3.3) Status in the current reporting year

Select from:

☑ Complete

(7.9.3.4) Type of verification or assurance

Select from:

☑ Limited assurance

(7.9.3.5) Attach the statement

Zorlu Enerji Limited Assurance_311225.pdf,Zorlu Enerji Integrated Annual Report 2025.pdf

(7.9.3.6) Page/section reference

KPMG Independent Limited Assurance Report, 11 March 2026: page 1 (scope, "All Other Absolute Scope 3 GHG Emissions, tCO2e, calculated across 15 categories" under Selected Information); page 2 (Our responsibilities, ISAE 3000 and ISAE 3410); page 3 (Conclusion). The report is reproduced in our 2025 Integrated Annual Report at pages 262-265.

(7.9.3.7) Relevant standard

Select all that apply

☑ ISAE3000

☑ ISAE 3410

(7.9.3.8) Proportion of selected emissions categories verified (%)

100

(7.9.3.9) Proportion of total reported scope 3 emissions verified (%)

100
[Add row]

(7.10) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Select from:

☑ Decreased

(7.10.1) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.

Change in renewable energy consumption

(7.10.1.1) Change in emissions (metric tons CO2e)

4939

(7.10.1.2) Direction of change in emissions

Select from:

☑ Decreased

(7.10.1.3) Emissions value (percentage)

0.51

(7.10.1.4) Please explain calculation

Solar power plants commissioned at our Kızıldere geothermal complex began supplying on-site electricity demand during the reporting year, reducing the volume of electricity drawn from the grid to meet auxiliary consumption. Scope 2 emissions at Kızıldere fell from 9,233 to 4,294 metric tons CO2e, a reduction of 4,939 metric tons CO2e attributable to self-generated renewable electricity. Expressed against our previous year gross Scope 1 and 2 emissions of 966,961 metric tons CO2e, this represents a decrease of 0.5108%. This figure reflects self-generated renewable electricity only and excludes the effect of renewable energy certificates retired against our consumption, which is captured within our market-based Scope 2 figure.

Other emissions reduction activities

(7.10.1.1) Change in emissions (metric tons CO2e)

828

(7.10.1.2) Direction of change in emissions

Select from:

☑ Decreased

(7.10.1.3) Emissions value (percentage)

0.086

(7.10.1.4) Please explain calculation

We introduced restrictions on the use of company vehicles across our electricity distribution operations at Osmangazi Elektrik Dağıtım A.Ş., reducing fuel consumption in the distribution fleet. Scope 1 emissions at OEDAŞ fell from 2,734 to 1,906 metric tons CO2e, a reduction of 828 metric tons CO2e. Expressed against our previous year gross Scope 1 and 2 emissions of 966,961 metric tons CO2e, this represents a decrease of 0.0856%.

Change in output

(7.10.1.1) Change in emissions (metric tons CO2e)

1548

(7.10.1.2) Direction of change in emissions

Select from:

☑ Decreased

(7.10.1.3) Emissions value (percentage)

0.16

(7.10.1.4) Please explain calculation

Changes in generation and steam output across our portfolio produced a net decrease of 1,548 metric tons CO2e, equivalent to 0.1601% of our previous year gross Scope 1 and 2 emissions of 966,961 metric tons CO2e. The largest single movement was at our Lüleburgaz combined heat and power plant, where Scope 1 emissions fell from 102,747 to 93,983 metric tons CO2e (a reduction of 8,764 metric tons CO2e) as the plant operates on demand to supply steam to textile customers and demand was lower in the reporting year. This was partly offset by higher output at our geothermal plants, with Scope 1 emissions rising by 614 metric tons CO2e at Kızıldere and 1,411 metric tons CO2e at Alaşehir. Scope 2 emissions increased by 5,357 metric tons CO2e at OEDAŞ on a like-for-like basis, reflecting a higher volume of technical and non-technical losses on the distribution network, and by 59 metric tons CO2e at Alaşehir, where the plant did not operate at the intended efficiency in certain months and drew more electricity from the grid.

Change in methodology

(7.10.1.1) Change in emissions (metric tons CO2e)

93480

(7.10.1.2) Direction of change in emissions

Select from:

☑ Decreased

(7.10.1.3) Emissions value (percentage)

9.67

(7.10.1.4) Please explain calculation

In the reporting year we replaced the Turkish national average grid emission factor with an independently verified emission factor specific to the Osmangazi distribution region for network losses at Osmangazi Elektrik Dağıtım A.Ş. Applying the previous methodology to the same activity data would have produced a Scope 2 figure of 256,038 metric tons CO2e for the reporting year rather than the 162,558 metric tons CO2e reported on a location-based basis, a difference of 93,480 metric tons CO2e. Expressed against our previous year gross Scope 1 and 2 emissions of 966,961 metric tons CO2e, this represents a decrease of 9.6674%. This methodological change, rather than an operational reduction, is the principal driver of the year-on-year decrease in our combined Scope 1 and 2 emissions; excluding its effect, our Scope 2 emissions were broadly unchanged. The change is described in question 7.1.2.

Change in boundary

(7.10.1.1) Change in emissions (metric tons CO2e)

2522

(7.10.1.2) Direction of change in emissions

Select from:

☑ Increased

(7.10.1.3) Emissions value (percentage)

0.26

(7.10.1.4) Please explain calculation

Two boundary changes affected our combined Scope 1 and 2 emissions, with a net increase of 2,522 metric tons CO2e, equivalent to 0.2608% of our previous year gross Scope 1 and 2 emissions of 966,961 metric tons CO2e. Emissions from leased vehicles provided by our subsidiary E-WAY are accounted for as a separate entity from this reporting year, contributing 2,784 metric tons CO2e to Scope 1; a portion of these emissions was previously reported within the inventories of the

facilities using the vehicles, and the corresponding reductions are visible at those facilities. Electrip Global Limited and its subsidiaries were removed from our Scope 1 and Scope 2 boundary following the loss of operational control, reducing Scope 1 by 147 and Scope 2 by 102 metric tons CO2e; these emissions are now accounted for under Scope 3, Category 15. The Dead Sea Solar Power Plant in Jericho, Palestine, contributed 13 metric tons CO2e to Scope 2 in the previous year and is excluded from the reporting year for the reasons set out in question 7.4.1.
[Fixed row]

(7.10.2) Are your emissions performance calculations in 7.10 and 7.10.1 based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?

Select from:
☑ Market-based

(7.12) Does your organization have significant land sector activities in its operations or value chain?

	Agriculture, forestry or other land sector activities	Specify the reason for no significant activities
	Select from: ☑ No, explanation provided	*Select from:* ☑ No relevant activities identified

[Fixed row]

(7.13) Does your organization choose to account for and report technological CO2 removals or captured CO2 with geologic storage, or have you done so in previous years?

	Technological CO2 removals or captured CO2 with geologic storage in the reporting year	Specify the reason for no technological CO2 removals or captured CO2 with geological storage in the reporting year	Technological CO2 removals or captured CO2 with geologic storage were accounted for and reported in previous years
	Select from: ☑ No, explanation provided	*Select from:* ☑ No relevant activities identified	*Select from:* ☑ No

[Fixed row]

(7.15) Does your organization break down its Scope 1 and/or Scope 2 emissions by greenhouse gas type?

(7.15.1) Emissions breakdown by greenhouse gas type

Select from:
☑ Yes, Scope 1 emissions only
[Fixed row]

(7.15.1) Break down your total gross global Scope 1 and Scope 2 emissions by greenhouse gas type and provide the source of each used global warming potential (GWP).

Row 1

(7.15.1.1) Greenhouse gas

Select from:
☑ CO2

(7.15.1.2) Scope 1 emissions (metric tons of selected gas)

683608

(7.15.1.3) Scope 1 emissions (metric tons of CO2e)

683608

(7.15.1.8) GWP Reference

Select from:

☑ IPCC Sixth Assessment Report (AR6 - 100 year)

Row 2

(7.15.1.1) Greenhouse gas

Select from:

☑ CH4

(7.15.1.2) Scope 1 emissions (metric tons of selected gas)

886

(7.15.1.3) Scope 1 emissions (metric tons of CO2e)

24723

(7.15.1.8) GWP Reference

Select from:

☑ IPCC Sixth Assessment Report (AR6 - 100 year)

Row 3

(7.15.1.1) Greenhouse gas

Select from:

☑ N2O

(7.15.1.2) Scope 1 emissions (metric tons of selected gas)

1.8

(7.15.1.3) Scope 1 emissions (metric tons of CO2e)

491

(7.15.1.8) GWP Reference

Select from:
☑ IPCC Sixth Assessment Report (AR6 - 100 year)

Row 4

(7.15.1.1) Greenhouse gas

Select from:
☑ HFCs

(7.15.1.2) Scope 1 emissions (metric tons of selected gas)

0.002

(7.15.1.3) Scope 1 emissions (metric tons of CO2e)

4.5

(7.15.1.8) GWP Reference

Select from:
☑ IPCC Sixth Assessment Report (AR6 - 100 year)

Row 5

(7.15.1.1) Greenhouse gas

Select from:
☑ SF6

(7.15.1.2) Scope 1 emissions (metric tons of selected gas)

0.018

(7.15.1.3) Scope 1 emissions (metric tons of CO2e)

463

(7.15.1.8) GWP Reference

Select from:
☑ IPCC Sixth Assessment Report (AR6 - 100 year)
[Add row]

(7.15.3) Break down your total gross global Scope 1 emissions from electric utilities value chain activities by greenhouse gas type.

Fugitives

(7.15.3.1) Gross Scope 1 CO2 emissions (metric tons CO2)

585373

(7.15.3.2) Gross Scope 1 methane emissions (metric tons CH4)

876

(7.15.3.3) Gross Scope 1 SF6 emissions (metric tons SF6)

0.018

(7.15.3.4) Total gross Scope 1 emissions (metric tons CO2e)

610282

Combustion (Electric utilities)

(7.15.3.1) Gross Scope 1 CO2 emissions (metric tons CO2)

93765

(7.15.3.2) Gross Scope 1 methane emissions (metric tons CH4)

8.9

(7.15.3.3) Gross Scope 1 SF6 emissions (metric tons SF6)

0

(7.15.3.4) Total gross Scope 1 emissions (metric tons CO2e)

94377

Combustion (Gas utilities)

(7.15.3.1) Gross Scope 1 CO2 emissions (metric tons CO2)

0

(7.15.3.2) Gross Scope 1 methane emissions (metric tons CH4)

0

(7.15.3.3) Gross Scope 1 SF6 emissions (metric tons SF6)

0

(7.15.3.4) Total gross Scope 1 emissions (metric tons CO2e)

0

Combustion (Other)

(7.15.3.1) Gross Scope 1 CO2 emissions (metric tons CO2)

1775

(7.15.3.2) Gross Scope 1 methane emissions (metric tons CH4)

0.22

(7.15.3.3) Gross Scope 1 SF6 emissions (metric tons SF6)

0

(7.15.3.4) Total gross Scope 1 emissions (metric tons CO2e)

1824

Emissions not elsewhere classified

(7.15.3.1) Gross Scope 1 CO2 emissions (metric tons CO2)

0

(7.15.3.2) Gross Scope 1 methane emissions (metric tons CH4)

0

(7.15.3.3) Gross Scope 1 SF6 emissions (metric tons SF6)

0

(7.15.3.4) Total gross Scope 1 emissions (metric tons CO2e)

0
[Fixed row]

(7.16) Break down your total gross global Scope 1 and 2 emissions by country/area.

	Scope 1 emissions (metric tons CO2e)
Pakistan	*76.4*
Palestine (State of)	*0*
Türkiye	*709213*

[Fixed row]

(7.17) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.

Select all that apply
☑ By business division
☑ By facility
☑ By activity

(7.17.1) Break down your total gross global Scope 1 emissions by business division.

Row 1

(7.17.1.1) Business division

Solar Energy Operations

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

0

Row 2

(7.17.1.1) Business division

Wind Energy Operations

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

224.4

Row 3

(7.17.1.1) Business division

Administrative Operation

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

2807.2

Row 4

(7.17.1.1) Business division

Geothermal Energy Operations

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

610080

Row 5

(7.17.1.1) Business division

Hydro Energy Operations

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

67.7

Row 6

(7.17.1.1) Business division

Thermal Generation Operation

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

93983

Row 7

(7.17.1.1) Business division

Electricity Distrubition&Trade Operations

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

2128
[Add row]

(7.17.2) Break down your total gross global Scope 1 emissions by business facility.

Row 1

(7.17.2.1) Facility

Palestine Solar Power Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

0

(7.17.2.3) Latitude

31.49215

(7.17.2.4) Longitude

35.28265

Row 2

(7.17.2.1) Facility

Pakistan Wind Power Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

76.45

(7.17.2.3) Latitude

25.043613

(7.17.2.4) Longitude

67.999048

Row 3

(7.17.2.1) Facility

İkizdere Hydro Power Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

15.97

(7.17.2.3) Latitude

40.795463

(7.17.2.4) Longitude

40.551031

Row 4

(7.17.2.1) Facility

Kuzgun Hydro Power Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

10.23

(7.17.2.3) Latitude

40.183631

(7.17.2.4) Longitude

41.063687

Row 5

(7.17.2.1) Facility

Mercan Hydro Power Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

1.38

(7.17.2.3) Latitude

39.413794

(7.17.2.4) Longitude

39.30221

Row 6

(7.17.2.1) Facility

İstanbul Headquarters

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

23.07

(7.17.2.3) Latitude

41.080441

(7.17.2.4) Longitude

29.010021

Row 7

(7.17.2.1) Facility

Gökçedağ Wind Power Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

147.96

(7.17.2.3) Latitude

37.074627

(7.17.2.4) Longitude

36.246399

Row 8

(7.17.2.1) Facility

Tercan Hydro Power Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

15.81

(7.17.2.3) Latitude

39.755985

(7.17.2.4) Longitude

40.40183

Row 9

(7.17.2.1) Facility

Çıldır Hydro Power Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

14.3

(7.17.2.3) Latitude

40.900774

(7.17.2.4) Longitude

43.328855

Row 10

(7.17.2.1) Facility

Kızıldere I-II-III Geothermal Power Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

559034

(7.17.2.3) Latitude

37.956213

(7.17.2.4) Longitude

28.842528

Row 11

(7.17.2.1) Facility

Beyköy Hydro Power Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

9.97

(7.17.2.3) Latitude

40.073156

(7.17.2.4) Longitude

30.755448

Row 12

(7.17.2.1) Facility

Ataköy Hydro Power Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

0

(7.17.2.3) Latitude

40.424004

(7.17.2.4) Longitude

36.884118

Row 13

(7.17.2.1) Facility

Lüleburgaz Power Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

93983

(7.17.2.3) Latitude

41.281941

(7.17.2.4) Longitude

27.590232

Row 14

(7.17.2.1) Facility

Alaşehir Geothermal Power Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

51045

(7.17.2.3) Latitude

38.400292

(7.17.2.4) Longitude

28.430808

Row 15

(7.17.2.1) Facility

OEPSAŞ

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

222.4

(7.17.2.3) Latitude

39.775254

(7.17.2.4) Longitude

30.515913

Row 16

(7.17.2.1) Facility

OEDAŞ

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

1905.6

(7.17.2.3) Latitude

39.775254

(7.17.2.4) Longitude

30.515913

Row 17

(7.17.2.1) Facility

Non-Stationary Sources

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

2784

(7.17.2.3) Latitude

0

(7.17.2.4) Longitude

0
[Add row]

(7.17.3) Break down your total gross global Scope 1 emissions by business activity.

	Activity	Scope 1 emissions (metric tons CO2e)
Row 1	*Stationary Combustion*	*94400*
Row 2	*Mobile Combustion*	*4608*
Row 3	*Fugitive Emissions*	*610282*

[Add row]

(7.19) Break down your organization’s total gross global Scope 1 emissions by sector production activity in metric tons CO2e.

Energy utility & power generators

(7.19.1) Gross Scope 1 emissions, metric tons CO2e

706482

(7.19.3) Comment

This figure covers Scope 1 emissions from our electricity generation, distribution and retail activities, comprising our geothermal, hydroelectric, wind and thermal generation assets in Türkiye and Pakistan, the Osmangazi electricity distribution network and our electricity retail operations. It includes fugitive emissions of non-condensable gases released with the geothermal fluid at our Kızıldere and Alaşehir plants, which represent the majority of our Scope 1 inventory, SF6 emissions from gas-insulated switchgear on the distribution network, stationary combustion at our generation and distribution sites, and on-site mobile combustion including movement of materials between sites. Starting from the figure of 709,340 metric tons CO2e reported in question 7.6, we have deducted emissions from two sources that are not dependent on being part of the energy utilities sector: our Levent 199 headquarters building in İstanbul, a non-industrial office property (23.07 metric tons CO2e), and our subsidiary E-WAY, which provides vehicle leasing services and whose fleet emissions cannot be attributed to specific production sites (2,784.15 metric tons CO2e). The Dead Sea Solar Power Plant in Jericho, Palestine, is within our organizational boundary but is excluded from reported emissions for the reasons set out in question 7.4.1. Emissions are calculated in accordance with the GHG Protocol Corporate Standard and ISO 14064-1 using the operational control consolidation approach, with IPCC 2006 default combustion factors and IPCC Sixth Assessment Report global warming potentials. This figure is consistent with the breakdown reported in question 7.15.3.
[Fixed row]

(7.22) Break down your gross Scope 1 and Scope 2 emissions between your consolidated accounting group and other entities included in your response.

Consolidated accounting group

(7.22.1) Scope 1 emissions (metric tons CO2e)

709340

(7.22.2) Scope 2, location-based emissions (metric tons CO2e)

162558

(7.22.3) Scope 2, market-based emissions (metric tons CO2e)

159348

(7.22.4) Please explain

All emissions reported in questions 7.6 and 7.7 arise from entities within our consolidated accounting group. Zorlu Energy prepares its financial statements in accordance with IFRS Accounting Standards, and the consolidated accounting group comprises Zorlu Enerji Elektrik Üretim A.Ş. and its consolidated subsidiaries. This includes our geothermal generation companies operating the Kızıldere and Alaşehir plants, our hydroelectric and wind generation subsidiaries in Türkiye and Pakistan, our Lüleburgaz combined heat and power plant, Osmangazi Elektrik Dağıtım A.Ş. and Osmangazi Elektrik Perakende Satış A.Ş., our vehicle leasing subsidiary E-WAY, and our Levent 199 headquarters building. We consolidate environmental data using the operational control approach; in our case the entities over which we hold operational control are the same entities that are consolidated in our financial statements, and the two boundaries therefore coincide for the reporting year.

All other entities

(7.22.1) Scope 1 emissions (metric tons CO2e)

0

(7.22.2) Scope 2, location-based emissions (metric tons CO2e)

0

(7.22.3) Scope 2, market-based emissions (metric tons CO2e)

0

(7.22.4) Please explain

Our response includes no emissions from entities outside the consolidated accounting group, and 0 has been entered for each column accordingly. Zorlu Energy holds a 49.99% equity interest in Electrip Global Limited, which is accounted for as an associate under the equity method. As we do not hold operational control of that entity, its emissions fall outside our Scope 1 and Scope 2 boundary and are reported under Scope 3, Category 15 (Investments) instead; this is described in questions 7.1.1 and 7.1.2. Our remaining 25% interest in Dorad Energy Ltd., also an equity-accounted associate, was divested on 22 July 2025 and its emissions were likewise reported under Scope 3, Category 15 rather than Scope 1 or Scope 2.
[Fixed row]

(7.23) Is your organization able to break down your emissions data for any of the subsidiaries included in your CDP response?

Select from:

☑ Yes

(7.23.1) Break down your gross Scope 1 and Scope 2 emissions by subsidiary.

Row 1

(7.23.1.1) Subsidiary name

Zorlu Osmangazi Enerji Sanayi ve Ticaret AŞ

(7.23.1.2) Primary activity

Select from:

☑ Electricity networks

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

2128

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

154601

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

153910

(7.23.1.15) Comment

Zorlu Osmangazi Enerji Sanayi ve Ticaret AŞ is a 100% direct subsidiary of Zorlu Enerji Elektrik Üretim AŞ and fully owns Osmangazi Elektrik Dağıtım AŞ (OEDAŞ), the licensed electricity distribution operator for the Osmangazi region, and Osmangazi Elektrik Perakende Satış AŞ (OEPSAŞ), our electricity retail business. The Scope 2 figure is dominated by technical and non-technical losses on the distribution network. In the reporting year we applied an independently verified region-specific grid emission factor to these losses in place of the Turkish national average factor, as described in question 7.1.2. Scope 1 emissions arise principally from the distribution fleet.

Row 2

(7.23.1.1) Subsidiary name

Zorlu Yenilenebilir Enerji AŞ

(7.23.1.2) Primary activity

Select from:

☑ Other renewable generation

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ LEI number

(7.23.1.9) LEI number

7890003XL281DFSLEQ74

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

610295

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

5251

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

5235

(7.23.1.15) Comment

Zorlu Yenilenebilir Enerji AŞ is a 100% direct subsidiary of Zorlu Enerji Elektrik Üretim AŞ and holds our renewable generation portfolio in Türkiye through its wholly owned subsidiaries Zorlu Jeotermal Enerji Elektrik Üretimi AŞ and Zorlu Doğal Elektrik Üretimi AŞ. The figures cover the Kızıldere I-II-III and Alaşehir geothermal power plants, seven hydroelectric power plants, and the Gökçedağ wind power plant. Fugitive emissions of non-condensable gases released with the geothermal fluid at Kızıldere and Alaşehir account for the large majority of the Scope 1 figure. Rotor Elektrik Üretim AŞ, which previously held the Gökçedağ plant, was merged into Zorlu Yenilenebilir Enerji AŞ with registration on 25 February 2025. Gökçedağ was divested on 29 December 2025 and its emissions are included in full for the reporting year.

Row 3

(7.23.1.1) Subsidiary name

Zorlu Enerji Pakistan Ltd.

(7.23.1.2) Primary activity

Select from:

☑ Wind Generation

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

76.4

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

172.3

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

172.3

(7.23.1.15) Comment

Zorlu Enerji Pakistan Ltd. is a 99.99% direct subsidiary of Zorlu Enerji Elektrik Üretim AŞ and operates the Jhimpir wind power plant in Sindh, Pakistan. Scope 1 emissions arise from on-road and off-road vehicle use at the site. The grid emission factor published by the national authority in Pakistan was applied to purchased electricity; no contractual instruments are available in that market, so the market-based figure is identical to the location-based figure.

Row 7

(7.23.1.1) Subsidiary name

Zorlu Enerji Elektrik Üretim AŞ

(7.23.1.2) Primary activity

Select from:

☑ CCGT generation

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

94006

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

2567

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

31.8

(7.23.1.15) Comment

Zorlu Enerji Elektrik Üretim AŞ is the parent company of the group. The figures cover the Lüleburgaz combined heat and power plant, which operates on demand to supply steam and electricity to industrial customers, and our Levent 199 headquarters building in İstanbul. The difference between the location-based and market-based Scope 2 figures reflects renewable energy certificates retired against consumption at the Lüleburgaz facility.

Row 8

(7.23.1.1) Subsidiary name

Eway Araç Kiralama Ticaret AŞ

(7.23.1.2) Primary activity

Select from:

☑ Vehicles & machinery rental & leasing

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

2784

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

0

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

0

(7.23.1.15) Comment

Eway Araç Kiralama Ticaret AŞ is a 100% direct subsidiary of Zorlu Enerji Elektrik Üretim AŞ and provides vehicle leasing services, principally to other group companies. Emissions from these leased vehicles were previously allocated to the Scope 1 inventories of the facilities using them; from this reporting year they are calculated and reported under this entity, which improves the completeness and traceability of our fleet emissions data. The entity holds no premises of its own and therefore has no Scope 2 emissions.
[Add row]

(7.29) What percentage of your total operational spend in the reporting year was on energy?

Select from:
☑ More than 5% but less than or equal to 10%

(7.30) Select which energy-related activities your organization has undertaken.

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	*Select from:* ☑ Yes
Consumption of purchased or acquired electricity	*Select from:* ☑ Yes
Consumption of purchased or acquired heat	*Select from:* ☑ No
Consumption of purchased or acquired steam	*Select from:* ☑ No
Consumption of purchased or acquired cooling	*Select from:* ☑ No
Generation of electricity, heat, steam, or cooling	*Select from:* ☑ Yes

[Fixed row]

(7.30.1) Report your organization’s energy consumption totals (excluding feedstocks) in MWh.

Consumption of fuel (excluding feedstock)

(7.30.1.1) Heating value

Select from:
☑ LHV (lower heating value)

(7.30.1.2) MWh from renewable sources

0

(7.30.1.3) MWh from non-renewable sources

604733

(7.30.1.5) Total (renewable + non-renewable) MWh

604733.00

Consumption of purchased or acquired electricity

(7.30.1.2) MWh from renewable sources

8113

(7.30.1.3) MWh from non-renewable sources

12552

(7.30.1.4) MWh from non-renewable zero or near-zero emission sources

0

(7.30.1.5) Total (renewable + non-renewable) MWh

20665.00

Consumption of self-generated non-fuel renewable energy

(7.30.1.2) MWh from renewable sources

407908

(7.30.1.5) Total (renewable + non-renewable) MWh

407908.00

Total energy consumption

(7.30.1.2) MWh from renewable sources

416021

(7.30.1.3) MWh from non-renewable sources

617285

(7.30.1.4) MWh from non-renewable zero or near-zero emission sources

0

(7.30.1.5) Total (renewable + non-renewable) MWh

1033306.00
[Fixed row]

(7.30.6) Select the applications of your organization’s consumption of fuel.

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	*Select from:* ☑ No
Consumption of fuel for the generation of heat	*Select from:* ☑ Yes
Consumption of fuel for the generation of steam	*Select from:* ☑ Yes
Consumption of fuel for the generation of cooling	*Select from:* ☑ No
Consumption of fuel for co-generation or tri-generation	*Select from:* ☑ No

[Fixed row]

(7.30.7) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.

Sustainable biomass

(7.30.7.1) Total fuel MWh consumed by the organization

0

(7.30.7.3) MWh fuel consumed for self-generation of heat

0

(7.30.7.4) MWh fuel consumed for self-generation of steam

0

Other biomass

(7.30.7.1) Total fuel MWh consumed by the organization

0

(7.30.7.3) MWh fuel consumed for self-generation of heat

0

(7.30.7.4) MWh fuel consumed for self-generation of steam

0

Other renewable fuels (e.g. renewable hydrogen)

(7.30.7.1) Total fuel MWh consumed by the organization

0

(7.30.7.3) MWh fuel consumed for self-generation of heat

0

(7.30.7.4) MWh fuel consumed for self-generation of steam

0

Coal

(7.30.7.1) Total fuel MWh consumed by the organization

584278

(7.30.7.3) MWh fuel consumed for self-generation of heat

0

(7.30.7.4) MWh fuel consumed for self-generation of steam

584278

Oil

(7.30.7.1) Total fuel MWh consumed by the organization

18261

(7.30.7.3) MWh fuel consumed for self-generation of heat

18261

(7.30.7.4) MWh fuel consumed for self-generation of steam

0

Gas

(7.30.7.1) Total fuel MWh consumed by the organization

2225

(7.30.7.3) MWh fuel consumed for self-generation of heat

2225

(7.30.7.4) MWh fuel consumed for self-generation of steam

0

Other non-renewable fuels (e.g. non-renewable hydrogen)

(7.30.7.1) Total fuel MWh consumed by the organization

0

(7.30.7.3) MWh fuel consumed for self-generation of heat

0

(7.30.7.4) MWh fuel consumed for self-generation of steam

0

Total fuel

(7.30.7.1) Total fuel MWh consumed by the organization

604764

(7.30.7.3) MWh fuel consumed for self-generation of heat

20486

(7.30.7.4) MWh fuel consumed for self-generation of steam

584278
[Fixed row]

(7.30.14) Provide a breakdown by country/area of your electricity/heat/steam/cooling consumption in the reporting year.

Pakistan

(7.30.14.1) Consumption of purchased electricity (MWh)

397

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

397.00

Palestine (State of)

(7.30.14.1) Consumption of purchased electricity (MWh)

0

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

0.00

Türkiye

(7.30.14.1) Consumption of purchased electricity (MWh)

20268

(7.30.14.2) Consumption of self-generated electricity (MWh)

407908

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

428176.00
[Fixed row]

(7.33) Does your electric utility organization have a transmission and distribution business?

Select from:
☑ Yes

(7.33.1) Disclose the following information about your transmission and distribution business.

Row 1

(7.33.1.1) Country/area

Select from:

☑ Türkiye

(7.33.1.2) Voltage level

Select from:

☑ Distribution (low voltage)

(7.33.1.3) Annual load (GWh)

8074.36

(7.33.1.4) Annual energy losses (% of annual load)

7.06

(7.33.1.5) Scope where emissions from energy losses are accounted for

Select from:

☑ Scope 2 (market-based)

(7.33.1.6) Emissions from energy losses (metric tons CO2e)

153901

(7.33.1.7) Length of network (km)

55784

(7.33.1.8) Number of connections

2131171

(7.33.1.9) Area covered (km2)

49419

(7.33.1.10) Comment

Osmangazi Elektrik Dağıtım A.Ş. (OEDAŞ), a wholly owned Zorlu Energy asset, is the licensed electricity distribution operator for five provinces in Türkiye: Afyonkarahisar, Bilecik, Eskişehir, Kütahya and Uşak, covering an area of 49,419 km² and serving 2,131,171 connections. Annual load represents electricity supplied to the distribution network in the reporting year. Of the 8,074 GWh supplied, 7,504 GWh was delivered to end users; the difference of 570 GWh represents technical and non-technical losses, equivalent to 7.06% of the load. Emissions from these losses were calculated by applying an emission factor of 0.27 kg CO2e/kWh specific to the Osmangazi distribution region, developed through a dedicated study and independently verified before use. This factor replaced the Turkish national average applied in previous years; the methodological change is described in question 7.1.2. The network comprises 55,784 km in total: 23,184 km of energy transmission lines, 13,159 km of village networks, 9,300 km of overhead urban networks and 10,141 km of underground urban networks. OEDAŞ invests in modernizing this infrastructure, improving energy efficiency and integrating distributed renewable generation, including energy storage and smart grid projects, which support Türkiye's energy transition and progressively reduce network losses.
[Add row]

(7.45) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

Row 1

(7.45.1) Intensity figure

0.000024

(7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

868688

(7.45.3) Metric denominator

Select from:
☑ unit total revenue

(7.45.4) Metric denominator: Unit total

36197416000

(7.45.5) Scope 2 figure used

Select from:

☑ Market-based

(7.45.6) % change from previous year

3.66

(7.45.7) Direction of change

Select from:

☑ Decreased

(7.45.8) Reasons for change

Select all that apply

☑ Change in output

☑ Change in revenue

☑ Change in boundary

☑ Change in methodology

☑ Other emissions reduction activities

☑ Change in renewable energy consumption

(7.45.9) Please explain

Our combined Scope 1 and Scope 2 emissions intensity per unit of revenue decreased from 0.0000249 to 0.0000240 metric tons CO2e per Turkish lira of revenue, a reduction of 3.66%. Emissions fell from 966,961 to 868,688 metric tons CO2e while revenue decreased from 38,819,421 thousand TL to 36,197,416 thousand TL. Both revenue figures are expressed in the purchasing power of 31 December 2025 under inflation accounting, so the comparison is made on a constant purchasing power basis; the prior year figure has been restated accordingly. The largest single driver of the emissions reduction was a change in methodology: we adopted an independently verified region-specific grid emission factor for network losses at our Osmangazi distribution operations, replacing the Turkish national average factor, which reduced reported Scope 2 emissions by 93,480 metric tons CO2e. Genuine operational reductions also contributed: solar plants commissioned at our Kızıldere

geothermal complex reduced grid electricity drawn to meet auxiliary consumption, lowering emissions by 4,939 metric tons CO2e, and restrictions introduced on company vehicle use across our distribution fleet reduced Scope 1 emissions by a further 828 metric tons CO2e. Lower steam demand at our Lüleburgaz facility reduced emissions through changes in output, while the removal of Electrip Global Limited from our inventory boundary and the separate reporting of our E-WAY leased vehicle fleet produced a net boundary increase of 2,522 metric tons CO2e. The decline in revenue partially offset these reductions in intensity terms. These factors are set out in full in question 7.10.1.

Row 2

(7.45.1) Intensity figure

0.33612

(7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

868688

(7.45.3) Metric denominator

Select from:

☑ megawatt hour generated (MWh)

(7.45.4) Metric denominator: Unit total

2584402

(7.45.5) Scope 2 figure used

Select from:

☑ Market-based

(7.45.6) % change from previous year

6

(7.45.7) Direction of change

Select from:

☑ Decreased

(7.45.8) Reasons for change

Select all that apply

☑ Change in output

☑ Change in revenue

☑ Change in boundary

☑ Change in methodology

☑ Other emissions reduction activities

☑ Change in renewable energy consumption

(7.45.9) Please explain

Our combined Scope 1 and Scope 2 emissions intensity per megawatt hour of gross electricity generated decreased from 0.35757 to 0.33612 metric tons CO2e per MWh, a reduction of 6.00%. Gross generation decreased from 2,704,212 MWh to 2,584,402 MWh, while combined Scope 1 and Scope 2 emissions fell from 966,961 to 868,688 metric tons CO2e. The numerator includes emissions from our electricity distribution network losses, which are not related to generation volume; the intensity therefore reflects the performance of the group as a whole rather than of our generation fleet alone. Within generation, fugitive emissions of non-condensable gases released with the geothermal fluid at our Kızıldere and Alaşehir plants account for the majority of Scope 1 emissions and are determined by reservoir chemistry rather than operational efficiency. The reduction in intensity was driven by the adoption of a region-specific grid emission factor for distribution losses, by solar generation commissioned at our Kızıldere complex which displaced grid electricity used for auxiliary consumption, and by reduced output at our Lüleburgaz coal-fired steam facility. All generation from our own assets in the reporting year was from renewable sources: 72.8% geothermal, 14.6% wind, 12.5% hydroelectric and 0.1% solar.

[Add row]

(7.46) For your electric utility activities, provide a breakdown of your Scope 1 emissions and emissions intensity relating to your total power plant capacity and generation during the reporting year by source.

	Absolute scope 1 emissions (metric tons CO2e)	Emissions intensity based on gross or net electricity generation	Scope 1 emissions intensity (Gross generation)
Gas	*0*		
Geothermal	*610080*	*Select from:* ☑ Gross	*324.34*
Hydropower	*67.7*	*Select from:* ☑ Gross	*0.21*
Onshore wind	*224.4*	*Select from:* ☑ Gross	*0.60*
Solar	*0*	*Select from:* ☑ Gross	*0.00*
Total	*610372*	*Select from:* ☑ Gross	*236.15*

[Fixed row]

(7.52) Provide any additional climate-related metrics relevant to your business.

Row 1

(7.52.1) Description

Select from:

☑ Energy usage

(7.52.2) Metric value

24.2

(7.52.3) Metric numerator

% of consumed energy in total produced energy

(7.52.4) Metric denominator (intensity metric only)

total consumed energy in total produced energy

(7.52.5) % change from previous year

4.94

(7.52.6) Direction of change

Select from:

☑ Increased

(7.52.7) Please explain

This metric expresses total energy consumed within our organizational boundary as a proportion of total energy produced, and is reported in our Integrated Annual Report as our energy intensity indicator. In the reporting year we consumed 2,251,433 GJ against gross generation of 2,584,402 MWh (9,303,847 GJ), giving a ratio of 24.2%, compared with 23.1% in the previous year. The increase reflects lower gross generation, which fell from 2,704,212 MWh to 2,584,402 MWh, rather than higher absolute consumption: total energy consumed was broadly unchanged year on year. Generation was lower principally because of reduced steam output at our Lüleburgaz facility, which operates on demand to supply industrial customers, and lower geothermal output. Solar plants commissioned at our Kızıldere geothermal complex during the reporting year reduced the volume of grid electricity drawn to meet auxiliary consumption at that site, partially offsetting the increase.

Row 2

(7.52.1) Description

Select from:

☑ Waste

(7.52.2) Metric value

98.75

(7.52.3) Metric numerator

% of recycled and recovered waste in total waste

(7.52.4) Metric denominator (intensity metric only)

total recycled and recovered waste in total waste

(7.52.5) % change from previous year

1.17

(7.52.6) Direction of change

Select from:

☑ Decreased

(7.52.7) Please explain

In the reporting year we recycled or recovered 36,982 tonnes of the 37,450 tonnes of waste generated across our operations, giving a rate of 98.75%, compared with 99.92% in the previous year. The reduction reflects an increase in disposed waste, principally at our electricity distribution operations, from 31 tonnes to 469 tonnes. Fly ash from our Lüleburgaz facility, which accounts for approximately 90% of that site's waste, continues to be supplied to cement manufacturers as a raw material rather than being landfilled; 30,563 tonnes were recovered in this way during the reporting year. Our waste management targets include a 10% annual reduction in total disposed waste, a 10% reduction in hazardous waste and a 10% reduction in fly ash, supported by zero waste training delivered to employees through Zorlu Akademi.
[Add row]

(7.53) Did you have an emissions target that was active in the reporting year?

Select all that apply

☑ Absolute target

☑ Intensity target

(7.53.1) Provide details of your absolute emissions targets and progress made against those targets.

Row 1

(7.53.1.1) Target reference number

Select from:

☑ Abs 1

(7.53.1.2) Is this a science-based target?

Select from:

☑ Yes, and this target has been approved by the Science Based Targets initiative

(7.53.1.3) Science Based Targets initiative official validation letter

SBTi Validation Report.pdf

(7.53.1.4) Target ambition

Select from:

☑ 1.5°C aligned

(7.53.1.5) Date target was set

02/01/2024

(7.53.1.6) Target coverage

Select from:

☑ Organization-wide

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

☑ Methane (CH4)

☑ Nitrous oxide (N2O)
☑ Hydrofluorocarbons (HFCs)
☑ Sulphur hexafluoride (SF6)

(7.53.1.8) Scopes

Select all that apply
☑ Scope 2

(7.53.1.9) Scope 2 accounting method

Select from:
☑ Location-based

(7.53.1.11) End date of base year

12/31/2021

(7.53.1.13) Base year Scope 2 emissions covered by target (metric tons CO2e)

240009.82

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

0.000

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

240009.820

(7.53.1.34) Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2

100

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

100

(7.53.1.54) End date of target

12/31/2030

(7.53.1.55) Targeted reduction from base year (%)

42

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

139205.696

(7.53.1.58) Scope 2 emissions in reporting year covered by target (metric tons CO2e)

162558.41

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

162558.410

(7.53.1.78) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.1.79) % of target achieved relative to base year

76.83

(7.53.1.80) Target status in reporting year

Select from:

☑ Underway

(7.53.1.82) Explain target coverage and identify any exclusions

Our target is organization-wide and fully aligned with our reporting boundary. There is no difference between the base year emissions of our inventory and the base year emissions of this target.

(7.53.1.83) Target objective

Zorlu Enerji's primary objective in emission reduction is to benefit from green bonds, and the achievement of SBTi targets is aimed in order to access such advantageous financing opportunities. The strategic purpose of the target is directly linked to Scope 2 emissions, which largely originate from grid losses in the distribution network. By reducing these losses, we aim not only to lower our carbon emissions but also to minimize their financial impacts.

(7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

Our decarbonization plan rests on three pillars. First, expansion of renewable generation capacity: our 2026-2030 capital expenditure plan allocates approximately USD 512 million to generation, all of it renewable, comprising approximately 77% wind, 20% geothermal and 3% solar. Second, hybridisation of existing assets: solar plants commissioned at our Kızıldere geothermal complex during the reporting year reduced grid electricity drawn to meet auxiliary consumption by 4,939 metric tons CO2e, and we are extending hybrid configurations across the portfolio. Third, operational efficiency: restrictions on company vehicle use across our distribution fleet reduced Scope 1 emissions by 828 metric tons CO2e, and network investment continues to reduce distribution losses. Progress is monitored annually through our GHG inventory, which is subject to third-party limited assurance, and reported to the Sustainability Committee, which meets four times a year and comprises two board members and the CEO. We anticipate a variable progress curve: reductions in Scope 2 depend on the decarbonization of the Turkish grid and on the pace of hybridisation, both of which vary year to year. The Paris Agreement's 1.5°C goal informed the setting of these targets, which were validated by the SBTi in May 2024, and Türkiye's 2053 net-zero commitment informs our transition planning.

(7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

☑ No

Row 2

(7.53.1.1) Target reference number

Select from:

☑ Abs 2

(7.53.1.2) Is this a science-based target?

Select from:

☑ Yes, and this target has been approved by the Science Based Targets initiative

(7.53.1.3) Science Based Targets initiative official validation letter

SBTi Validation Report.pdf

(7.53.1.4) Target ambition

Select from:

☑ 1.5°C aligned

(7.53.1.5) Date target was set

02/01/2024

(7.53.1.6) Target coverage

Select from:

☑ Organization-wide

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

☑ Methane (CH4)

☑ Nitrous oxide (N2O)

☑ Hydrofluorocarbons (HFCs)

☑ Sulphur hexafluoride (SF6)

(7.53.1.8) Scopes

Select all that apply

☑ Scope 2

(7.53.1.9) Scope 2 accounting method

Select from:

☑ Location-based

(7.53.1.11) End date of base year

12/31/2021

(7.53.1.13) Base year Scope 2 emissions covered by target (metric tons CO2e)

240009.82

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

0.000

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

240009.820

(7.53.1.34) Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2

100

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

100

(7.53.1.54) End date of target

12/31/2040

(7.53.1.55) Targeted reduction from base year (%)

90

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

24000.982

(7.53.1.58) Scope 2 emissions in reporting year covered by target (metric tons CO2e)

162558.41

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

162558.410

(7.53.1.78) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.1.79) % of target achieved relative to base year

35.86

(7.53.1.80) Target status in reporting year

Select from:

☑ Underway

(7.53.1.82) Explain target coverage and identify any exclusions

Our target is organization-wide and fully aligned with our reporting boundary. There is no difference between the base year emissions of our inventory and the base year emissions of this target.

(7.53.1.83) Target objective

Zorlu Enerji's primary objective in emission reduction is to benefit from green bonds, and the achievement of SBTi targets is aimed in order to access such advantageous financing opportunities. The strategic purpose of the target is directly linked to Scope 2 emissions, which largely originate from grid losses in the distribution network. By reducing these losses, we aim not only to lower our carbon emissions but also to minimize their financial impacts.

(7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

Our decarbonization plan rests on three pillars. First, expansion of renewable generation capacity: our 2026-2030 capital expenditure plan allocates approximately USD 512 million to generation, all of it renewable, comprising approximately 77% wind, 20% geothermal and 3% solar. Second, hybridisation of existing assets: solar plants commissioned at our Kızıldere geothermal complex during the reporting year reduced grid electricity drawn to meet auxiliary consumption by 4,939 metric tons CO2e, and we are extending hybrid configurations across the portfolio. Third, operational efficiency: restrictions on company vehicle use across our distribution fleet reduced Scope 1 emissions by 828 metric tons CO2e, and network investment continues to reduce distribution losses. Progress is monitored annually through our GHG inventory, which is subject to third-party limited assurance, and reported to the Sustainability Committee, which meets four times a year and comprises two board members and the CEO. We anticipate a variable progress curve: reductions in Scope 2 depend on the decarbonization of the Turkish grid and on the pace of hybridisation, both of which vary year to year. The Paris Agreement's 1.5°C goal informed the setting of these targets, which were validated by the SBTi in May 2024, and Türkiye's 2053 net-zero commitment informs our transition planning.

(7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

☑ No

Row 3

(7.53.1.1) Target reference number

Select from:

☑ Abs 3

(7.53.1.2) Is this a science-based target?

Select from:

☑ Yes, and this target has been approved by the Science Based Targets initiative

(7.53.1.3) Science Based Targets initiative official validation letter

SBTi Validation Report.pdf

(7.53.1.4) Target ambition

Select from:

☑ Well-below 2°C aligned

(7.53.1.5) Date target was set

02/01/2024

(7.53.1.6) Target coverage

Select from:

☑ Organization-wide

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

☑ Methane (CH4)

☑ Nitrous oxide (N2O)

☑ Hydrofluorocarbons (HFCs)

☑ Sulphur hexafluoride (SF6)

(7.53.1.8) Scopes

Select all that apply

☑ Scope 3

(7.53.1.10) Scope 3 categories

Select all that apply

☑ Scope 3, Category 15 – Investments
☑ Scope 3, Category 2 – Capital goods
☑ Scope 3, Category 6 – Business travel
☑ Scope 3, Category 7 – Employee commuting
☑ Scope 3, Category 11 – Use of sold products
☑ Scope 3, Category 1 – Purchased goods and services
☑ Scope 3, Category 5 – Waste generated in operations
☑ Scope 3, Category 12 – End-of-life treatment of sold products
☑ Scope 3, Category 4 – Upstream transportation and distribution
☑ Scope 3, Category 9 – Downstream transportation and distribution
☑ Scope 3, Category 3 – Fuel- and energy- related activities (not included in Scope 1 or 2)

(7.53.1.11) End date of base year

12/31/2021

(7.53.1.14) Base year Scope 3, Category 1: Purchased goods and services emissions covered by target (metric tons CO2e)

62711.14

(7.53.1.15) Base year Scope 3, Category 2: Capital goods emissions covered by target (metric tons CO2e)

665.64

(7.53.1.16) Base year Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions covered by target (metric tons CO2e)

69830

(7.53.1.17) Base year Scope 3, Category 4: Upstream transportation and distribution emissions covered by target (metric tons CO2e)

59284.85

(7.53.1.18) Base year Scope 3, Category 5: Waste generated in operations emissions covered by target (metric tons CO2e)

2083.35

(7.53.1.19) Base year Scope 3, Category 6: Business travel emissions covered by target (metric tons CO2e)

9657.97

(7.53.1.20) Base year Scope 3, Category 7: Employee commuting emissions covered by target (metric tons CO2e)

10012.09

(7.53.1.22) Base year Scope 3, Category 9: Downstream transportation and distribution emissions covered by target (metric tons CO2e)

240.55

(7.53.1.24) Base year Scope 3, Category 11: Use of sold products emissions covered by target (metric tons CO2e)

1700.52

(7.53.1.25) Base year Scope 3, Category 12: End-of-life treatment of sold products emissions covered by target (metric tons CO2e)

340.12

(7.53.1.28) Base year Scope 3, Category 15: Investments emissions covered by target (metric tons CO2e)

518331.08

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

734857.310

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

734857.310

(7.53.1.35) Base year Scope 3, Category 1: Purchased goods and services emissions covered by target as % of total base year emissions in Scope 3, Category 1: Purchased goods and services (metric tons CO2e)

100

(7.53.1.36) Base year Scope 3, Category 2: Capital goods emissions covered by target as % of total base year emissions in Scope 3, Category 2: Capital goods (metric tons CO2e)

100

(7.53.1.37) Base year Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions covered by target as % of total base year emissions in Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

2.12

(7.53.1.38) Base year Scope 3, Category 4: Upstream transportation and distribution covered by target as % of total base year emissions in Scope 3, Category 4: Upstream transportation and distribution (metric tons CO2e)

100

(7.53.1.39) Base year Scope 3, Category 5: Waste generated in operations emissions covered by target as % of total base year emissions in Scope 3, Category 5: Waste generated in operations (metric tons CO2e)

100

(7.53.1.40) Base year Scope 3, Category 6: Business travel emissions covered by target as % of total base year emissions in Scope 3, Category 6: Business travel (metric tons CO2e)

100

(7.53.1.41) Base year Scope 3, Category 7: Employee commuting covered by target as % of total base year emissions in Scope 3, Category 7: Employee commuting (metric tons CO2e)

100

(7.53.1.43) Base year Scope 3, Category 9: Downstream transportation and distribution emissions covered by target as % of total base year emissions in Scope 3, Category 9: Downstream transportation and distribution (metric tons CO2e)

100

(7.53.1.45) Base year Scope 3, Category 11: Use of sold products emissions covered by target as % of total base year emissions in Scope 3, Category 11: Use of sold products (metric tons CO2e)

100

(7.53.1.46) Base year Scope 3, Category 12: End-of-life treatment of sold products emissions covered by target as % of total base year emissions in Scope 3, Category 12: End-of-life treatment of sold products (metric tons CO2e)

100

(7.53.1.49) Base year Scope 3, Category 15: Investments emissions covered by target as % of total base year emissions in Scope 3, Category 15: Investments (metric tons CO2e)

100

(7.53.1.52) Base year total Scope 3 emissions covered by target as % of total base year emissions in Scope 3 (in all Scope 3 categories)

100

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

100

(7.53.1.54) End date of target

12/31/2030

(7.53.1.55) Targeted reduction from base year (%)

25

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

551142.983

(7.53.1.59) Scope 3, Category 1: Purchased goods and services emissions in reporting year covered by target (metric tons CO2e)

53158

(7.53.1.60) Scope 3, Category 2: Capital goods emissions in reporting year covered by target (metric tons CO2e)

0

(7.53.1.61) Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions in reporting year covered by target (metric tons CO2e)

34972

(7.53.1.62) Scope 3, Category 4: Upstream transportation and distribution emissions in reporting year covered by target (metric tons CO2e)

16364

(7.53.1.63) Scope 3, Category 5: Waste generated in operations emissions in reporting year covered by target (metric tons CO2e)

183.2

(7.53.1.64) Scope 3, Category 6: Business travel emissions in reporting year covered by target (metric tons CO2e)

345.6

(7.53.1.65) Scope 3, Category 7: Employee commuting emissions in reporting year covered by target (metric tons CO2e)

6494.5

(7.53.1.67) Scope 3, Category 9: Downstream transportation and distribution emissions in reporting year covered by target (metric tons CO2e)

0

(7.53.1.69) Scope 3, Category 11: Use of sold products emissions in reporting year covered by target (metric tons CO2e)

0

(7.53.1.70) Scope 3, Category 12: End-of-life treatment of sold products emissions in reporting year covered by target (metric tons CO2e)

0

(7.53.1.73) Scope 3, Category 15: Investments emissions in reporting year covered by target (metric tons CO2e)

27154

(7.53.1.76) Total Scope 3 emissions in reporting year covered by target (metric tons CO2e)

138671.300

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

138671.300

(7.53.1.78) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.1.79) % of target achieved relative to base year

324.52

(7.53.1.80) Target status in reporting year

Select from:

☑ Underway

(7.53.1.82) Explain target coverage and identify any exclusions

Our target is organization-wide and fully aligned with our reporting boundary. There is no difference between the base year emissions of our inventory and the base year emissions of this target. The target covers all Scope 3 categories except Category 3 (Fuel- and energy-related activities), of which 97.88% is covered by our separate SBTi-approved intensity target for Scope 1 and 3 emissions from fuel and energy related activities covering all sold electricity; the remaining 2.12% of Category 3 is included here. The target therefore covers 18.45% of our total base year Scope 3 emissions, with the remainder covered by the intensity target reported in question 7.53.2. Together the two targets cover 99.99% of our base year Scope 3 emissions, above the SBTi threshold. Reported progress substantially exceeds the linear pathway. This is driven principally by the divestment of our remaining 25% interest in Dorad Energy Ltd., completed on 22 July 2025, which reduced Scope 3 Category 15 emissions from 518,331.08 metric tons CO2e in the base year to 27,154.08 metric tons CO2e in the reporting year, and by the transfer of operational control of Electrip Global Limited, which moved emissions previously reported in Categories 11 and 12 into Category 15. Progress therefore reflects structural change rather than operational abatement alone. In line with SBTi Criteria 33, we are reviewing whether these structural changes require a target recalculation and will engage with the SBTi accordingly.

(7.53.1.83) Target objective

Zorlu Enerji's primary objective in emission reduction is to benefit from green bonds, and the achievement of SBTi targets is aimed in order to access such advantageous financing opportunities.

(7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

Our decarbonization plan rests on three pillars. First, expansion of renewable generation capacity: our 2026-2030 capital expenditure plan allocates approximately USD 512 million to generation, all of it renewable, comprising approximately 77% wind, 20% geothermal and 3% solar. Second, hybridisation of existing assets: solar plants commissioned at our Kızıldere geothermal complex during the reporting year reduced grid electricity drawn to meet auxiliary consumption by 4,939 metric tons CO2e, and we are extending hybrid configurations across the portfolio. Third, operational efficiency: restrictions on company vehicle use across our distribution fleet reduced Scope 1 emissions by 828 metric tons CO2e, and network investment continues to reduce distribution losses. Progress is monitored annually through our GHG inventory, which is subject to third-party limited assurance, and reported to the Sustainability Committee, which meets four times a year and comprises two board members and the CEO. We anticipate a variable progress curve: reductions in Scope 2 depend on the decarbonization of the Turkish grid and on the pace of

hybridisation, both of which vary year to year. The Paris Agreement's 1.5°C goal informed the setting of these targets, which were validated by the SBTi in May 2024, and Türkiye's 2053 net-zero commitment informs our transition planning.

(7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

☑ No

Row 4

(7.53.1.1) Target reference number

Select from:

☑ Abs 4

(7.53.1.2) Is this a science-based target?

Select from:

☑ Yes, and this target has been approved by the Science Based Targets initiative

(7.53.1.3) Science Based Targets initiative official validation letter

SBTi Validation Report.pdf

(7.53.1.4) Target ambition

Select from:

☑ 1.5°C aligned

(7.53.1.5) Date target was set

02/01/2024

(7.53.1.6) Target coverage

Select from:

☑ Organization-wide

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

☑ Methane (CH4)

☑ Nitrous oxide (N2O)

☑ Hydrofluorocarbons (HFCs)

☑ Sulphur hexafluoride (SF6)

(7.53.1.8) Scopes

Select all that apply

☑ Scope 3

(7.53.1.10) Scope 3 categories

Select all that apply

☑ Scope 3, Category 15 – Investments

☑ Scope 3, Category 2 – Capital goods

☑ Scope 3, Category 6 – Business travel

☑ Scope 3, Category 7 – Employee commuting

☑ Scope 3, Category 11 – Use of sold products

☑ Scope 3, Category 1 – Purchased goods and services

☑ Scope 3, Category 5 – Waste generated in operations

☑ Scope 3, Category 12 – End-of-life treatment of sold products

☑ Scope 3, Category 4 – Upstream transportation and distribution

☑ Scope 3, Category 9 – Downstream transportation and distribution

☑ Scope 3, Category 3 – Fuel- and energy- related activities (not included in Scope 1 or 2)

(7.53.1.11) End date of base year

12/31/2021

(7.53.1.14) Base year Scope 3, Category 1: Purchased goods and services emissions covered by target (metric tons CO2e)

62711.14

(7.53.1.15) Base year Scope 3, Category 2: Capital goods emissions covered by target (metric tons CO2e)

665.64

(7.53.1.16) Base year Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions covered by target (metric tons CO2e)

69830

(7.53.1.17) Base year Scope 3, Category 4: Upstream transportation and distribution emissions covered by target (metric tons CO2e)

59284.85

(7.53.1.18) Base year Scope 3, Category 5: Waste generated in operations emissions covered by target (metric tons CO2e)

2083.35

(7.53.1.19) Base year Scope 3, Category 6: Business travel emissions covered by target (metric tons CO2e)

9657.97

(7.53.1.20) Base year Scope 3, Category 7: Employee commuting emissions covered by target (metric tons CO2e)

10012.09

(7.53.1.22) Base year Scope 3, Category 9: Downstream transportation and distribution emissions covered by target (metric tons CO2e)

240.55

(7.53.1.24) Base year Scope 3, Category 11: Use of sold products emissions covered by target (metric tons CO2e)

1700.52

(7.53.1.25) Base year Scope 3, Category 12: End-of-life treatment of sold products emissions covered by target (metric tons CO2e)

340.12

(7.53.1.28) Base year Scope 3, Category 15: Investments emissions covered by target (metric tons CO2e)

518331.08

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

734857.310

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

734857.310

(7.53.1.35) Base year Scope 3, Category 1: Purchased goods and services emissions covered by target as % of total base year emissions in Scope 3, Category 1: Purchased goods and services (metric tons CO2e)

100

(7.53.1.36) Base year Scope 3, Category 2: Capital goods emissions covered by target as % of total base year emissions in Scope 3, Category 2: Capital goods (metric tons CO2e)

100

(7.53.1.37) Base year Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions covered by target as % of total base year emissions in Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

2.12

(7.53.1.38) Base year Scope 3, Category 4: Upstream transportation and distribution covered by target as % of total base year emissions in Scope 3, Category 4: Upstream transportation and distribution (metric tons CO2e)

100

(7.53.1.39) Base year Scope 3, Category 5: Waste generated in operations emissions covered by target as % of total base year emissions in Scope 3, Category 5: Waste generated in operations (metric tons CO2e)

100

(7.53.1.40) Base year Scope 3, Category 6: Business travel emissions covered by target as % of total base year emissions in Scope 3, Category 6: Business travel (metric tons CO2e)

100

(7.53.1.41) Base year Scope 3, Category 7: Employee commuting covered by target as % of total base year emissions in Scope 3, Category 7: Employee commuting (metric tons CO2e)

100

(7.53.1.43) Base year Scope 3, Category 9: Downstream transportation and distribution emissions covered by target as % of total base year emissions in Scope 3, Category 9: Downstream transportation and distribution (metric tons CO2e)

100

(7.53.1.45) Base year Scope 3, Category 11: Use of sold products emissions covered by target as % of total base year emissions in Scope 3, Category 11: Use of sold products (metric tons CO2e)

100

(7.53.1.46) Base year Scope 3, Category 12: End-of-life treatment of sold products emissions covered by target as % of total base year emissions in Scope 3, Category 12: End-of-life treatment of sold products (metric tons CO2e)

100

(7.53.1.49) Base year Scope 3, Category 15: Investments emissions covered by target as % of total base year emissions in Scope 3, Category 15: Investments (metric tons CO2e)

100

(7.53.1.52) Base year total Scope 3 emissions covered by target as % of total base year emissions in Scope 3 (in all Scope 3 categories)

100

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

100

(7.53.1.54) End date of target

12/31/2040

(7.53.1.55) Targeted reduction from base year (%)

90

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

73485.731

(7.53.1.59) Scope 3, Category 1: Purchased goods and services emissions in reporting year covered by target (metric tons CO2e)

53158

(7.53.1.60) Scope 3, Category 2: Capital goods emissions in reporting year covered by target (metric tons CO2e)

0

(7.53.1.61) Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions in reporting year covered by target (metric tons CO2e)

34972

(7.53.1.62) Scope 3, Category 4: Upstream transportation and distribution emissions in reporting year covered by target (metric tons CO2e)

16364

(7.53.1.63) Scope 3, Category 5: Waste generated in operations emissions in reporting year covered by target (metric tons CO2e)

183.2

(7.53.1.64) Scope 3, Category 6: Business travel emissions in reporting year covered by target (metric tons CO2e)

345.6

(7.53.1.65) Scope 3, Category 7: Employee commuting emissions in reporting year covered by target (metric tons CO2e)

6494.5

(7.53.1.67) Scope 3, Category 9: Downstream transportation and distribution emissions in reporting year covered by target (metric tons CO2e)

0

(7.53.1.69) Scope 3, Category 11: Use of sold products emissions in reporting year covered by target (metric tons CO2e)

0

(7.53.1.70) Scope 3, Category 12: End-of-life treatment of sold products emissions in reporting year covered by target (metric tons CO2e)

0

(7.53.1.73) Scope 3, Category 15: Investments emissions in reporting year covered by target (metric tons CO2e)

27154

(7.53.1.76) Total Scope 3 emissions in reporting year covered by target (metric tons CO2e)

138671.300

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

138671.300

(7.53.1.78) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.1.79) % of target achieved relative to base year

90.14

(7.53.1.80) Target status in reporting year

Select from:

☑ Underway

(7.53.1.82) Explain target coverage and identify any exclusions

Our target is organization-wide and fully aligned with our reporting boundary. There is no difference between the base year emissions of our inventory and the base year emissions of this target. The target covers all Scope 3 categories except Category 3 (Fuel- and energy-related activities), of which 97.88% is covered by our separate SBTi-approved intensity target for Scope 1 and 3 emissions from fuel and energy related activities covering all sold electricity; the remaining 2.12% of Category 3 is included here. The target therefore covers 18.45% of our total base year Scope 3 emissions, with the remainder covered by the intensity target reported in question 7.53.2. Together the two targets cover 99.99% of our base year Scope 3 emissions, above the SBTi threshold. Reported progress substantially exceeds the linear pathway. This is driven principally by the divestment of our remaining 25% interest in Dorad Energy Ltd., completed on 22 July 2025, which reduced Scope

3 Category 15 emissions from 518,331.08 metric tons CO2e in the base year to 27,154.08 metric tons CO2e in the reporting year, and by the transfer of operational control of Electrip Global Limited, which moved emissions previously reported in Categories 11 and 12 into Category 15. Progress therefore reflects structural change rather than operational abatement alone. In line with SBTi Criteria 33, we are reviewing whether these structural changes require a target recalculation and will engage with the SBTi accordingly.

(7.53.1.83) Target objective

Zorlu Enerji's primary objective in emission reduction is to benefit from green bonds, and the achievement of SBTi targets is aimed in order to access such advantageous financing opportunities.

(7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

Our decarbonization plan rests on three pillars. First, expansion of renewable generation capacity: our 2026-2030 capital expenditure plan allocates approximately USD 512 million to generation, all of it renewable, comprising approximately 77% wind, 20% geothermal and 3% solar. Second, hybridisation of existing assets: solar plants commissioned at our Kızıldere geothermal complex during the reporting year reduced grid electricity drawn to meet auxiliary consumption by 4,939 metric tons CO2e, and we are extending hybrid configurations across the portfolio. Third, operational efficiency: restrictions on company vehicle use across our distribution fleet reduced Scope 1 emissions by 828 metric tons CO2e, and network investment continues to reduce distribution losses. Progress is monitored annually through our GHG inventory, which is subject to third-party limited assurance, and reported to the Sustainability Committee, which meets four times a year and comprises two board members and the CEO. We anticipate a variable progress curve: reductions in Scope 2 depend on the decarbonization of the Turkish grid and on the pace of hybridisation, both of which vary year to year. The Paris Agreement's 1.5°C goal informed the setting of these targets, which were validated by the SBTi in May 2024, and Türkiye's 2053 net-zero commitment informs our transition planning.

(7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

☑ No

[Add row]

(7.53.2) Provide details of your emissions intensity targets and progress made against those targets.

Row 1

(7.53.2.1) Target reference number

Select from:

☑ Int 1

(7.53.2.2) Is this a science-based target?

Select from:

☑ Yes, and this target has been approved by the Science Based Targets initiative

(7.53.2.3) Science Based Targets initiative official validation letter

SBTi Validation Report.pdf

(7.53.2.4) Target ambition

Select from:

☑ 1.5°C aligned

(7.53.2.5) Date target was set

02/01/2024

(7.53.2.6) Target coverage

Select from:

☑ Organization-wide

(7.53.2.7) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

☑ Methane (CH4)

☑ Nitrous oxide (N2O)

☑ Hydrofluorocarbons (HFCs)

(7.53.2.8) Scopes

Select all that apply

☑ Scope 1

(7.53.2.11) Intensity metric

Select from:

☑ Metric tons CO2e per megawatt hour (MWh)

(7.53.2.12) End date of base year

12/31/2021

(7.53.2.13) Intensity figure in base year for Scope 1

0.402

(7.53.2.33) Intensity figure in base year for all selected Scopes

0.4020000000

(7.53.2.34) % of total base year emissions in Scope 1 covered by this Scope 1 intensity figure

100

(7.53.2.54) % of total base year emissions in all selected Scopes covered by this intensity figure

100

(7.53.2.55) End date of target

12/31/2030

(7.53.2.56) Targeted reduction from base year (%)

73.71

(7.53.2.57) Intensity figure at end date of target for all selected Scopes

0.1056858000

(7.53.2.58) % change anticipated in absolute Scope 1+2 emissions

-65

(7.53.2.60) Intensity figure in reporting year for Scope 1

0.2745

(7.53.2.80) Intensity figure in reporting year for all selected Scopes

0.2745000000

(7.53.2.81) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.2.82) % of target achieved relative to base year

43.03

(7.53.2.83) Target status in reporting year

Select from:

☑ Underway

(7.53.2.85) Explain target coverage and identify any exclusions

Scope 1 GHG Emissions Intensity from Electricity and Heat Generation, (tCO2e/MWh) Definition Scope 1 GHG Emissions are direct Greenhouse Gas (GHG) emissions occurring from Zorlu Enerji's business activities. The definition of the denominator of the intensity metric will be the energy generated by Zorlu Enerji in MWh. Calculation Methodology The Company calculates its Scope 1 GHG emissions according to the International Panel on Climate Change (IPCC) guidelines and the 2006 Guidelines for National Greenhouse Gas Inventories. The coverage ratio is 100% of Scope 1 GHG Emissions. Investing in low-carbon business (EV ecosystem, smart-systems etc.)

(7.53.2.86) Target objective

Zorlu Enerji Elektrik Üretim A.Ş. (Zorlu Enerji) commits to reduce scope 1 GHG emission intensity from electricity and heat generation 73.71% per MWh by 2030 from a 2021 base year. By achieving these targets, Zorlu Enerji aims to benefit from green bonds, gain a competitive advantage in the sector, and avoid potential risks.

(7.53.2.87) Plan for achieving target, and progress made to the end of the reporting year

Our decarbonization plan rests on three pillars. First, expansion of renewable generation capacity: our 2026-2030 capital expenditure plan allocates approximately USD 512 million to generation, all of it renewable, comprising approximately 77% wind, 20% geothermal and 3% solar. Second, hybridisation of existing assets: solar plants commissioned at our Kızıldere geothermal complex during the reporting year reduced grid electricity drawn to meet auxiliary consumption by 4,939 metric tons CO2e, and we are extending hybrid configurations across the portfolio. Third, operational efficiency: restrictions on company vehicle use across our distribution fleet reduced Scope 1 emissions by 828 metric tons CO2e, and network investment continues to reduce distribution losses. Progress is monitored annually through our GHG inventory, which is subject to third-party limited assurance, and reported to the Sustainability Committee, which meets four times a year and comprises two board members and the CEO. We anticipate a variable progress curve: reductions in Scope 2 depend on the decarbonization of the Turkish grid and on the pace of hybridisation, both of which vary year to year. The Paris Agreement's 1.5°C goal informed the setting of these targets, which were validated by the SBTi in May 2024, and Türkiye's 2053 net-zero commitment informs our transition planning.

(7.53.2.88) Target derived using a sectoral decarbonization approach

Select from:

☑ Yes

Row 2

(7.53.2.1) Target reference number

Select from:

☑ Int 2

(7.53.2.2) Is this a science-based target?

Select from:

☑ Yes, and this target has been approved by the Science Based Targets initiative

(7.53.2.3) Science Based Targets initiative official validation letter

SBTi Validation Report.pdf

(7.53.2.4) Target ambition

Select from:

☑ 1.5°C aligned

(7.53.2.5) Date target was set

02/01/2024

(7.53.2.6) Target coverage

Select from:

☑ Organization-wide

(7.53.2.7) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

☑ Methane (CH4)

☑ Nitrous oxide (N2O)

☑ Hydrofluorocarbons (HFCs)

(7.53.2.8) Scopes

Select all that apply

☑ Scope 1

(7.53.2.11) Intensity metric

Select from:

☑ Metric tons CO2e per megawatt hour (MWh)

(7.53.2.12) End date of base year

12/31/2021

(7.53.2.13) Intensity figure in base year for Scope 1

0.402

(7.53.2.33) Intensity figure in base year for all selected Scopes

0.4020000000

(7.53.2.34) % of total base year emissions in Scope 1 covered by this Scope 1 intensity figure

100

(7.53.2.54) % of total base year emissions in all selected Scopes covered by this intensity figure

100

(7.53.2.55) End date of target

12/31/2040

(7.53.2.56) Targeted reduction from base year (%)

97.7

(7.53.2.57) Intensity figure at end date of target for all selected Scopes

0.0092460000

(7.53.2.58) % change anticipated in absolute Scope 1+2 emissions

-96

(7.53.2.60) Intensity figure in reporting year for Scope 1

0.2745

(7.53.2.80) Intensity figure in reporting year for all selected Scopes

0.2745000000

(7.53.2.81) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.2.82) % of target achieved relative to base year

32.46

(7.53.2.83) Target status in reporting year

Select from:

☑ Underway

(7.53.2.85) Explain target coverage and identify any exclusions

Scope 1 GHG Emissions Intensity from Electricity and Heat Generation, (tCO2e/MWh) Definition Scope 1 GHG Emissions are direct Greenhouse Gas (GHG) emissions occurring from Zorlu Enerji's business activities. The definition of the denominator of the intensity metric will be the energy generated by Zorlu Enerji in MWh. Calculation Methodology The Company calculates its Scope 1 GHG emissions according to the International Panel on Climate Change (IPCC) guidelines and the 2006 Guidelines for National Greenhouse Gas Inventories. The coverage ratio is 100% of Scope 1 GHG Emissions. Investing in low-carbon business (EV ecosystem, smart-systems etc.)

(7.53.2.86) Target objective

Zorlu Enerji Elektrik Üretim A.Ş. (Zorlu Enerji) commits to reduce scope 1 GHG emission intensity from electricity and heat generation 97.7% per MWh by 2040 from a 2021 base year. By achieving these targets, Zorlu Enerji aims to benefit from green bonds, gain a competitive advantage in the sector, and avoid potential risks.

(7.53.2.87) Plan for achieving target, and progress made to the end of the reporting year

Our decarbonization plan rests on three pillars. First, expansion of renewable generation capacity: our 2026-2030 capital expenditure plan allocates approximately USD 512 million to generation, all of it renewable, comprising approximately 77% wind, 20% geothermal and 3% solar. Second, hybridisation of existing assets: solar plants commissioned at our Kızıldere geothermal complex during the reporting year reduced grid electricity drawn to meet auxiliary consumption by 4,939 metric tons CO2e, and we are extending hybrid configurations across the portfolio. Third, operational efficiency: restrictions on company vehicle use across our distribution fleet reduced Scope 1 emissions by 828 metric tons CO2e, and network investment continues to reduce distribution losses. Progress is monitored annually through our GHG inventory, which is subject to third-party limited assurance, and reported to the Sustainability Committee, which meets four times a year and comprises two board members and the CEO. We anticipate a variable progress curve: reductions in Scope 2 depend on the decarbonization of the Turkish grid and on the pace of hybridisation, both of which vary year to year. The Paris Agreement's 1.5°C goal informed the setting of these targets, which were validated by the SBTi in May 2024, and Türkiye's 2053 net-zero commitment informs our transition planning.

(7.53.2.88) Target derived using a sectoral decarbonization approach

Select from:

☑ Yes

Row 3

(7.53.2.1) Target reference number

Select from:

☑ Int 3

(7.53.2.2) Is this a science-based target?

Select from:

☑ Yes, and this target has been approved by the Science Based Targets initiative

(7.53.2.3) Science Based Targets initiative official validation letter

SBTi Validation Report.pdf

(7.53.2.4) Target ambition

Select from:

☑ 1.5°C aligned

(7.53.2.5) Date target was set

02/01/2024

(7.53.2.6) Target coverage

Select from:

☑ Organization-wide

(7.53.2.7) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

☑ Methane (CH4)

☑ Nitrous oxide (N2O)

☑ Hydrofluorocarbons (HFCs)

(7.53.2.8) Scopes

Select all that apply

☑ Scope 1

☑ Scope 3

(7.53.2.10) Scope 3 categories

Select all that apply

☑ Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2)

(7.53.2.11) Intensity metric

Select from:

☑ Metric tons CO2e per megawatt hour (MWh)

(7.53.2.12) End date of base year

12/31/2021

(7.53.2.13) Intensity figure in base year for Scope 1

0.105

(7.53.2.17) Intensity figure in base year for Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2)

0.322

(7.53.2.32) Intensity figure in base year for total Scope 3

0.3220000000

(7.53.2.33) Intensity figure in base year for all selected Scopes

0.4270000000

(7.53.2.34) % of total base year emissions in Scope 1 covered by this Scope 1 intensity figure

100

(7.53.2.38) % of total base year emissions in Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) covered by this Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) intensity figure

97.88

(7.53.2.53) % of total base year emissions in Scope 3 (in all Scope 3 categories) covered by this total Scope 3 intensity figure

81.54

(7.53.2.54) % of total base year emissions in all selected Scopes covered by this intensity figure

98

(7.53.2.55) End date of target

12/31/2030

(7.53.2.56) Targeted reduction from base year (%)

73.71

(7.53.2.57) Intensity figure at end date of target for all selected Scopes

0.1122583000

(7.53.2.58) % change anticipated in absolute Scope 1+2 emissions

-65

(7.53.2.59) % change anticipated in absolute Scope 3 emissions

-62

(7.53.2.60) Intensity figure in reporting year for Scope 1

0.0852

(7.53.2.64) Intensity figure in reporting year for Scope 3, Category 3: Fuel- and energy-related activities

0.1754

(7.53.2.79) Intensity figure in reporting year for total Scope 3

0.1754000000

(7.53.2.80) Intensity figure in reporting year for all selected Scopes

0.2606000000

(7.53.2.81) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.2.82) % of target achieved relative to base year

52.87

(7.53.2.83) Target status in reporting year

Select from:

☑ Underway

(7.53.2.85) Explain target coverage and identify any exclusions

Scope 1 and 3 GHG Emissions Intensity from Fuel and Energy-Related Activities, (tCO2e/MWh) Definition Scope 1 GHG Emissions are direct GHG emissions occurring from sources that are owned or controlled by Zorlu Enerji. Scope 3 GHG Emissions are other indirect emissions, not covered in Scope 2, arising from fuel and energy-related activities following the GHG Protocol. The definition of the denominator of the intensity metric will be the energy sold by Zorlu Enerji in MWh.Coverage ratio is 100%. Emissions from electricity distribution under OEDAŞ and OEPSAŞ, which account for 98% of Scope 3.3 category emissions, are included within the target boundary. The remaining 2% of emissions in Scope 3.3 from other activities are excluded from this target.

(7.53.2.86) Target objective

Zorlu Enerji Elektrik Üretim A.Ş. (Zorlu Enerji) further commits to reduce scope 1 and 3 GHG emissions from fuel and energy related activities covering all sold electricity 73.71% per MWh within the same timeframe. (2021 to 2030) By achieving these targets, Zorlu Enerji aims to benefit from green bonds, gain a competitive advantage in the sector, and avoid potential risks.

(7.53.2.87) Plan for achieving target, and progress made to the end of the reporting year

Our decarbonization plan rests on three pillars. First, expansion of renewable generation capacity: our 2026-2030 capital expenditure plan allocates approximately USD 512 million to generation, all of it renewable, comprising approximately 77% wind, 20% geothermal and 3% solar. Second, hybridisation of existing assets: solar plants commissioned at our Kızıldere geothermal complex during the reporting year reduced grid electricity drawn to meet auxiliary consumption by 4,939 metric tons CO2e, and we are extending hybrid configurations across the portfolio. Third, operational efficiency: restrictions on company vehicle use across our distribution fleet reduced Scope 1 emissions by 828 metric tons CO2e, and network investment continues to reduce distribution losses. Progress is monitored annually through our

GHG inventory, which is subject to third-party limited assurance, and reported to the Sustainability Committee, which meets four times a year and comprises two board members and the CEO. We anticipate a variable progress curve: reductions in Scope 2 depend on the decarbonization of the Turkish grid and on the pace of hybridisation, both of which vary year to year. The Paris Agreement's 1.5°C goal informed the setting of these targets, which were validated by the SBTi in May 2024, and Türkiye's 2053 net-zero commitment informs our transition planning.

(7.53.2.88) Target derived using a sectoral decarbonization approach

Select from:

☑ Yes

Row 4

(7.53.2.1) Target reference number

Select from:

☑ Int 4

(7.53.2.2) Is this a science-based target?

Select from:

☑ Yes, and this target has been approved by the Science Based Targets initiative

(7.53.2.3) Science Based Targets initiative official validation letter

SBTi Validation Report.pdf

(7.53.2.4) Target ambition

Select from:

☑ 1.5°C aligned

(7.53.2.5) Date target was set

02/01/2024

(7.53.2.6) Target coverage

Select from:

☑ Organization-wide

(7.53.2.7) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

☑ Methane (CH4)

☑ Nitrous oxide (N2O)

☑ Hydrofluorocarbons (HFCs)

(7.53.2.8) Scopes

Select all that apply

☑ Scope 1

☑ Scope 3

(7.53.2.10) Scope 3 categories

Select all that apply

☑ Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2)

(7.53.2.11) Intensity metric

Select from:

☑ Metric tons CO2e per megawatt hour (MWh)

(7.53.2.12) End date of base year

12/31/2021

(7.53.2.13) Intensity figure in base year for Scope 1

0.105

(7.53.2.17) Intensity figure in base year for Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2)

0.322

(7.53.2.32) Intensity figure in base year for total Scope 3

0.3220000000

(7.53.2.33) Intensity figure in base year for all selected Scopes

0.4270000000

(7.53.2.34) % of total base year emissions in Scope 1 covered by this Scope 1 intensity figure

100

(7.53.2.38) % of total base year emissions in Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) covered by this Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) intensity figure

97.88

(7.53.2.53) % of total base year emissions in Scope 3 (in all Scope 3 categories) covered by this total Scope 3 intensity figure

81.54

(7.53.2.54) % of total base year emissions in all selected Scopes covered by this intensity figure

98

(7.53.2.55) End date of target

12/31/2040

(7.53.2.56) Targeted reduction from base year (%)

97.8

(7.53.2.57) Intensity figure at end date of target for all selected Scopes

0.0093940000

(7.53.2.58) % change anticipated in absolute Scope 1+2 emissions

-96

(7.53.2.59) % change anticipated in absolute Scope 3 emissions

-96

(7.53.2.60) Intensity figure in reporting year for Scope 1

0.0852

(7.53.2.64) Intensity figure in reporting year for Scope 3, Category 3: Fuel- and energy-related activities

0.1754

(7.53.2.79) Intensity figure in reporting year for total Scope 3

0.1754000000

(7.53.2.80) Intensity figure in reporting year for all selected Scopes

0.2606000000

(7.53.2.81) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.2.82) % of target achieved relative to base year

39.85

(7.53.2.83) Target status in reporting year

Select from:

☑ Underway

(7.53.2.85) Explain target coverage and identify any exclusions

Scope 1 and 3 GHG Emissions Intensity from Fuel and Energy-Related Activities, (tCO2e/MWh) Definition Scope 1 GHG Emissions are direct GHG emissions occurring from sources that are owned or controlled by Zorlu Enerji. Scope 3 GHG Emissions are other indirect emissions, not covered in Scope 2, arising from fuel and energy-related activities following the GHG Protocol. The definition of the denominator of the intensity metric will be the energy sold by Zorlu Enerji in MWh.Coverage ratio is 100%. Emissions from electricity distribution under OEDAŞ and OEPSAŞ, which account for 98% of Scope 3.3 category emissions, are included within the target boundary. The remaining 2% of emissions in Scope 3.3 from other activities are excluded from this target.

(7.53.2.86) Target objective

Zorlu Enerji Elektrik Üretim A.Ş. (Zorlu Enerji) further commits to reduce scope 1 and 3 GHG emissions from fuel and energy-related activities covering all sold electricity 97.8% per MWh within the same timeframe. (2021 to 2040) By achieving these targets, Zorlu Enerji aims to benefit from green bonds, gain a competitive advantage in the sector, and avoid potential risks.

(7.53.2.87) Plan for achieving target, and progress made to the end of the reporting year

Our decarbonization plan rests on three pillars. First, expansion of renewable generation capacity: our 2026-2030 capital expenditure plan allocates approximately USD 512 million to generation, all of it renewable, comprising approximately 77% wind, 20% geothermal and 3% solar. Second, hybridisation of existing assets: solar plants commissioned at our Kızıldere geothermal complex during the reporting year reduced grid electricity drawn to meet auxiliary consumption by 4,939 metric tons CO2e, and we are extending hybrid configurations across the portfolio. Third, operational efficiency: restrictions on company vehicle use across our distribution fleet reduced Scope 1 emissions by 828 metric tons CO2e, and network investment continues to reduce distribution losses. Progress is monitored annually through our GHG inventory, which is subject to third-party limited assurance, and reported to the Sustainability Committee, which meets four times a year and comprises two board members and the CEO. We anticipate a variable progress curve: reductions in Scope 2 depend on the decarbonization of the Turkish grid and on the pace of hybridisation, both of which vary year to year. The Paris Agreement's 1.5°C goal informed the setting of these targets, which were validated by the SBTi in May 2024, and Türkiye's 2053 net-zero commitment informs our transition planning.

(7.53.2.88) Target derived using a sectoral decarbonization approach

Select from:

☑ Yes

[Add row]

(7.54) Did you have any other climate-related targets that were active in the reporting year?

Select all that apply

☑ Targets to increase or maintain low-carbon energy consumption or production

☑ Net-zero targets

(7.54.1) Provide details of your targets to increase or maintain low-carbon energy consumption or production.

Row 1

(7.54.1.1) Target reference number

Select from:

☑ Low 1

(7.54.1.2) Date target was set

12/31/2019

(7.54.1.3) Target coverage

Select from:

☑ Organization-wide

(7.54.1.4) Target type: energy carrier

Select from:

☑ Electricity

(7.54.1.5) Target type: activity

Select from:

☑ Production

(7.54.1.6) Target type: energy source

Select from:

☑ Renewable energy source(s) only

(7.54.1.7) End date of base year

12/31/2020

(7.54.1.8) Consumption or production of selected energy carrier in base year (MWh)

3061025

(7.54.1.9) % share of low-carbon or renewable energy in base year

87

(7.54.1.10) End date of target

12/31/2030

(7.54.1.11) % share of low-carbon or renewable energy at end date of target

100

(7.54.1.12) % share of low-carbon or renewable energy in reporting year

100

(7.54.1.13) % of target achieved relative to base year

100.00

(7.54.1.14) Target status in reporting year

Select from:

☑ Achieved

(7.54.1.16) Is this target part of an emissions target?

Int 1

(7.54.1.17) Is this target part of an overarching initiative?

Select all that apply

☑ No, it's not part of an overarching initiative

(7.54.1.19) Explain target coverage and identify any exclusions

This target is organization-wide and covers all electricity generation from assets under our operational control. It relates to self-generated renewable electricity production. Our Lüleburgaz facility combusts coal to produce steam for industrial customers and does not generate electricity, and is therefore outside the boundary of this target. By 2030 we aim to generate all of our electricity in Türkiye from renewable sources and to invest in the protection and improvement of biodiversity, mitigating regulatory risk related to climate change and positioning the company in a more resilient market position.

(7.54.1.20) Target objective

"By 2030, we aim to generate all of our electricity production in Turkey from renewable energy sources, thereby mitigating potential regulatory challenges related to climate change and positioning ourselves in a more advantageous and resilient market position.

(7.54.1.22) List the actions which contributed most to achieving this target

Our Turkish generation portfolio has been fully renewable since the divestment of our thermal generation interests. In the reporting year 100% of gross electricity generated from our own assets came from renewable sources: 72.8% geothermal, 14.6% wind, 12.5% hydroelectric and 0.1% solar. The actions that contributed most to achieving this target were the divestment of our remaining 25% interest in Dorad Energy Ltd., a combined-cycle natural gas plant in Israel, completed on 22 July 2025, which ended our thermal electricity generation activities; the earlier exit from our natural gas distribution business; and continued investment in renewable capacity, including the hybridisation of existing assets with solar at our Kızıldere geothermal complex and our Alaşehir plant. Our Lüleburgaz facility continues to combust coal, but it produces steam for industrial customers only and does not generate electricity; it is therefore outside the boundary of this target. We intend to

maintain 100% renewable electricity generation and to report progress annually. Our 2026-2030 capital expenditure plan allocates approximately USD 512 million to generation capacity, all of it renewable, comprising approximately 77% wind, 20% geothermal and 3% solar.

Row 2

(7.54.1.1) Target reference number

Select from:

☑ Low 2

(7.54.1.2) Date target was set

12/31/2019

(7.54.1.3) Target coverage

Select from:

☑ Organization-wide

(7.54.1.4) Target type: energy carrier

Select from:

☑ Electricity

(7.54.1.5) Target type: activity

Select from:

☑ Consumption

(7.54.1.6) Target type: energy source

Select from:

☑ Renewable energy source(s) only

(7.54.1.7) End date of base year

12/31/2020

(7.54.1.8) Consumption or production of selected energy carrier in base year (MWh)

8847.0

(7.54.1.9) % share of low-carbon or renewable energy in base year

14.0

(7.54.1.10) End date of target

12/31/2030

(7.54.1.11) % share of low-carbon or renewable energy at end date of target

100

(7.54.1.12) % share of low-carbon or renewable energy in reporting year

39.25

(7.54.1.13) % of target achieved relative to base year

29.36

(7.54.1.14) Target status in reporting year

Select from:
☑ Underway

(7.54.1.16) Is this target part of an emissions target?

Abs 1

(7.54.1.17) Is this target part of an overarching initiative?

Select all that apply

☑ No, it’s not part of an overarching initiative

(7.54.1.19) Explain target coverage and identify any exclusions

This target is organization-wide and covers the consumption of purchased electricity at all facilities under our operational control. It covers both self-generated renewable electricity consumed on site and purchased renewable electricity backed by contractual instruments. By 2030 we aim to meet 100% of our own electricity consumption from renewable sources, which delivers long-term energy cost predictability and eliminates the greenhouse gas emissions associated with fossil-fuel-based grid electricity.

(7.54.1.20) Target objective

By 2030, we aim to use 100% renewable energy for our self consumption. This transition will enable long-term energy efficiency and cost advantages through more predictable renewable sources, while eliminating fossil fuel-related greenhouse gas emissions to significantly reduce our carbon footprint.

(7.54.1.21) Plan for achieving target, and progress made to the end of the reporting year

This target covers the electricity we purchase for consumption at our own facilities. In the reporting year 8,113 MWh of the 20,665 MWh of electricity we purchased came from renewable sources, a share of 39.25%, against 14% in the base year of 2020. We plan to reach 100% through two routes. First, self-supply: solar plants commissioned at our Kızıldere geothermal complex during the reporting year now meet part of the auxiliary consumption at that site, displacing grid electricity and reducing emissions by 4,939 metric tons CO2e. We are extending hybrid solar configurations across our generation portfolio, which progressively converts purchased consumption into self-generated renewable consumption. Second, contractual instruments: we retire YEK-G certificates issued under the Turkish national scheme and I-REC certificates against consumption at our own facilities, and we intend to increase the volume retired each year until full coverage is reached. Progress is monitored annually through our energy and GHG inventory, which is subject to third-party limited assurance, and is reported to the Sustainability Committee, which meets four times a year and comprises two board members and the CEO. We anticipate a variable progress curve: the pace depends on the commissioning schedule of hybrid solar projects and on certificate availability in the Turkish market, both of which vary year to year. The Paris Agreement's 1.5°C goal and Türkiye's 2053 net-zero commitment inform this target, which supports our SBTi-approved Scope 2 absolute reduction target (Abs 1).
[Add row]

(7.54.3) Provide details of your net-zero target(s).

Row 1

(7.54.3.1) Target reference number

Select from:

☑ NZ1

(7.54.3.2) Date target was set

02/01/2024

(7.54.3.3) Target Coverage

Select from:

☑ Organization-wide

(7.54.3.4) Targets linked to this net zero target

Select all that apply

☑ Abs1
☑ Abs2
☑ Abs3
☑ Abs4
☑ Int1
☑ Int2
☑ Int3
☑ Int4

(7.54.3.5) End date of target for achieving net zero

12/31/2040

(7.54.3.6) Is this a science-based target?

Select from:

☑ Yes, and this target has been approved by the Science Based Targets initiative

(7.54.3.7) Science Based Targets initiative official validation letter

SBTi Validation Report.pdf

(7.54.3.8) Scopes

Select all that apply

☑ Scope 1

☑ Scope 2

☑ Scope 3

(7.54.3.9) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

☑ Methane (CH4)

☑ Nitrous oxide (N2O)

☑ Hydrofluorocarbons (HFCs)

☑ Sulphur hexafluoride (SF6)

(7.54.3.10) Explain target coverage and identify any exclusions

Zorlu Energy has committed to reach net-zero greenhouse gas emissions across its value chain by 2040. This target was validated by the Science Based Targets initiative on 21 May 2024 and covers Scope 1, Scope 2 and Scope 3 emissions across the whole organization, in line with the boundary determined by our operational control consolidation approach. There are no exclusions. The target is underpinned by four near-term targets for 2030 and four long-term targets for 2040, all approved by the SBTi and reported in questions 7.53.1 and 7.53.2. The base year for the net-zero target is 2021 and is identical to the base year of our GHG inventory reported in question 7.5. The 1.5°C goal of the Paris Agreement directly informed the setting of this target: our Scope 1 and Scope 2 targets were modelled against SBTi pathways consistent with limiting global temperature increase to 1.5°C above pre-industrial levels, and the SBTi classified them as 1.5°C aligned. Türkiye's Nationally Determined Contribution and its 2053 net-zero commitment inform our transition planning, and our 2040 target date is 13 years ahead of the national commitment.

(7.54.3.11) Target objective

Reaching net-zero by 2040 is the organizing objective of Zorlu Energy's transition strategy and shapes our capital allocation. Our 2026-2030 capital expenditure plan allocates approximately USD 512 million to generation capacity, all of it renewable, comprising approximately 77% wind, 20% geothermal and 3% solar. We have exited carbon-intensive lines of business in support of this objective: our natural gas distribution business was divested, and our remaining interest in Dorad Energy Ltd., a combined-cycle natural gas plant, was sold on 22 July 2025, ending our thermal electricity generation activities. The target serves three strategic purposes. It positions us for the regulatory transition in Türkiye, including the emerging national emissions trading scheme and the country's 2053 net-zero commitment, reducing our exposure to future carbon pricing. It supports our access to sustainable finance: achievement of SBTi-validated targets is a condition of the green bond and sustainability-linked instruments through which we fund renewable capacity, and delivers a measurable cost of capital advantage. And it responds to customer and investor expectations in the electricity market, where demand for verifiably low-carbon supply is growing.

(7.54.3.12) Do you intend to neutralize any residual emissions with permanent carbon removals at the end of the target?

Select from:

☑ Yes

(7.54.3.13) Do you plan to mitigate emissions beyond your value chain?

Select from:

☑ Yes, and we have already acted on this in the reporting year

(7.54.3.14) Do you intend to purchase and cancel carbon credits for neutralization and/or beyond value chain mitigation?

Select all that apply

☑ Yes, we plan to purchase and cancel carbon credits for beyond value chain mitigation

(7.54.3.15) Planned milestones and/or near-term investments for neutralization at the end of the target

Our net-zero target is structured so that at least 90% of base year emissions are abated through the long-term reduction targets approved by the SBTi: a 97.7% reduction in Scope 1 emissions intensity from electricity and heat generation per MWh generated, a 90% absolute reduction in Scope 2 emissions, a 97.8% reduction in Scope 1 and Scope 3 fuel- and energy-related emissions intensity per MWh sold, and a 90% absolute reduction in all other Scope 3 emissions. Applying these reductions to our 2021 base year of 5,311,219 metric tons CO2e, residual emissions at the 2040 target date are expected to be in the order of 150,000 to 250,000 metric tons CO2e, arising principally from fugitive non-condensable gases released with the geothermal fluid at our Kızıldere and Alaşehir plants, which cannot be fully abated with currently available technology. Our near-term investment in neutralization capability is focused on carbon capture and reinjection at our geothermal assets. Under the GECO project, supported by the EU Horizon 2020 programme, a pilot system at Kızıldere 3 compressed non-condensable gases and directed them to a reinjection well in 2023, capturing approximately 1,000 tonnes of CO2 equivalent. The pilot has concluded and feasibility work for full-scale deployment is in progress. A further project, JESKE, is under development to design an adjustable, mobile injection system for geothermal wells. We have not yet determined whether carbon credits will form part of our neutralization approach at the target date; any credits used would be independently verified and would supplement, not substitute for, the emissions reductions described above.

(7.54.3.16) Describe the actions to mitigate emissions beyond your value chain

We fund afforestation beyond our value chain through our Zero Carbon Footprint Forests project, carried out with the General Directorate of Forestry under the Memorial Forests regulation. By the end of the reporting year 692,000 saplings had been planted against a target of 1.2 million by 2035, with 2,000 planted in the reporting year at Bandırma, Balıkesir. We neither own nor manage this land and we do not account for or claim any carbon removals from these plantings in our GHG inventory or against our net-zero target; the activity is undertaken as beyond value chain mitigation and as a contribution to ecosystem restoration in the regions where we operate. We also contribute to the global net-zero transition through research and development conducted outside our own operations. In the reporting year our R&D and innovation budget was 154.5 million TL. Projects supported under EU Horizon programmes include VERTI-GO, which develops floating offshore wind

technologies, and EOLIAN, which develops fully recyclable wind turbine blades using vitrimer composites; the results of both are intended to benefit the wider sector rather than Zorlu Energy alone. We have determined the nature and scale of these commitments on a money-for-money basis. We do not currently purchase carbon credits for beyond value chain mitigation.

(7.54.3.17) Target status in reporting year

Select from:

☑ Underway

(7.54.3.19) Process for reviewing target

Progress against our net-zero target and the near-term and long-term targets underpinning it is reviewed annually through our GHG inventory, which is prepared in accordance with the GHG Protocol Corporate Standard and ISO 14064-1 and is subject to third-party limited assurance. Results are reported to the Sustainability Committee, which meets four times a year and comprises two board members and the Chief Executive Officer, and which reports to the Board of Directors. In line with SBTi Criterion 32, we have committed to review our targets against the most recent SBTi criteria at a minimum of every five years and to recalculate and revalidate them if necessary. We apply a 5% significance threshold for emissions recalculations. Under SBTi Criterion 33 we have also agreed that targets will be recalculated as needed to reflect significant changes that could compromise the relevance and consistency of the existing target, including acquisitions, divestments, mergers, changes in inventory boundary, and the discovery of significant errors. Structural changes that occurred in the reporting year, including the divestment of our remaining interest in Dorad Energy Ltd. and the transfer of operational control of Electrip Global Limited, are being assessed against these criteria and we will engage with the SBTi on any resulting recalculation. We do not currently purchase carbon credits, and none of our SBTi-validated targets rely on them: the SBTi confirmed in its validation report that our submitted targets include neither carbon credits nor avoided emissions. We do, however, intend to purchase and cancel high-quality carbon credits in the future, both to support beyond value chain mitigation and to neutralize any residual emissions that remain at our 2040 net-zero target date. Credits will be used only to supplement, and never to substitute for, the emissions reductions committed under our near-term and long-term science-based targets. Any credits purchased will be independently verified by a recognised third-party standard, and we will disclose the volume, type and certification scheme of credits retired in the year they are used. We will keep this position under review as the SBTi's guidance on neutralization and beyond value chain mitigation develops.
[Add row]

(7.55) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.

	Emissions reduction initiatives that were active within the reporting year
	Select from: ☑ Yes

[Fixed row]

(7.55.1) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e
Under investigation	*0*	
To be implemented	*0*	*0*
Implementation commenced	*0*	*0*
Implemented	*2*	*5767*
Not to be implemented	*0*	

[Fixed row]

(7.55.2) Provide details on the initiatives implemented in the reporting year in the table below.

Row 1

(7.55.2.1) Initiative category & Initiative type

Low-carbon energy generation

☑ Solar PV

(7.55.2.2) Estimated annual CO_2e savings (metric tonnes CO2e)

4939

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☑ Scope 2 (location-based)

☑ Scope 2 (market-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

☑ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

34140553

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

252000000

(7.55.2.7) Payback period

Select from:

☑ 4-10 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☑ 21-30 years

(7.55.2.9) Comment

Solar photovoltaic plants commissioned at our Kızıldere geothermal complex during the reporting year supply part of the auxiliary electricity demand at the site, displacing electricity previously drawn from the grid. Scope 2 emissions at Kızıldere fell from 9,233 to 4,294 metric tons CO2e, a reduction of 4,939 metric tons CO2e, corresponding to approximately 11,380 MWh of grid electricity displaced. This forms part of a wider programme to convert existing generation assets to hybrid configurations, which we are extending across the portfolio. Monetary savings are estimated from the avoided cost of purchased electricity at our average 2025 purchase price. Investment is stated at the 31 December 2025 exchange rate.

Row 2

(7.55.2.1) Initiative category & Initiative type

Transportation

☑ Company fleet vehicle efficiency

(7.55.2.2) Estimated annual CO_2e savings (metric tonnes CO2e)

828

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☑ Scope 1

(7.55.2.4) Voluntary/Mandatory

Select from:

☑ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

15373275

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

0

(7.55.2.7) Payback period

Select from:

☑ No payback

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☑ Ongoing

(7.55.2.9) Comment

We introduced restrictions on the use of company vehicles across our electricity distribution operations at Osmangazi Elektrik Dağıtım A.Ş., including route optimisation and limits on discretionary journeys. Scope 1 emissions from the distribution fleet fell from 2,734 to 1,906 metric tons CO2e, a reduction of 828 metric tons CO2e, corresponding to approximately 307,000 litres of diesel. The initiative is a policy and behavioural measure requiring no capital investment, so no payback period applies; savings arise entirely from reduced fuel purchase, estimated at our average 2025 diesel price.
[Add row]

(7.55.3) What methods do you use to drive investment in emissions reduction activities?

Row 1

(7.55.3.1) Method

Select from:

☑ Internal price on carbon

(7.55.3.2) Comment

Internal carbon price is also determined by Sustainability Committee considering the emerging regulationary framework and actual carbon price in international emission trading systems.Under MRV reporting conducted by Zorlu since 2015, stationary combustion and process emissions of our facilities are reported to the

ministerial authorities. With respect to the production capacity and emission levels, carbon intensity of each facility is determined and internal pricing is applied on lower performing facilities. Performance of the plants are followed by Environment and Sustainability Executive and reported to the Sustainability Committee.

Row 2

(7.55.3.1) Method

Select from:

☑ Compliance with regulatory requirements/standards

(7.55.3.2) Comment

The importance we give to the environment goes beyond legal requirements. As we continue our operations, we act on the basis of our Sustainability Strategy and Environmental Policy when it comes to efficient use of energy, management of greenhouse gas emissions, prevention of waste generation, protection of biodiversity and natural heritage.We had all the required legal inspections conducted at existing power plants and projects regarding their environmental impacts, and these audits identified no serious and material violation regarding the environment. All activities are carried out in accordance with the national regulations on the environment, obligations arising from international conventions, and environmental awareness.Geothermal Village ProjectThe project aims to utilize the excess heat produced by the geothermal power plant to power the greenhouse, heating, electricity generation, thermal tourism, food drying, and aquaculture activities to be undertaken by the village which will be built next to the GPP, and the project development is underway.Horizon 2020 Program - GECO ProjectThe Horizon 2020 Program is the largest Research and Innovation Program in the European Union with €80 billion of funding available over seven years. The Program aims to take major discoveries, creative ideas, and inventions from the laboratory to the world markets to create a more sustainable world.Horizon 2020 Program - GeoSmart ProjectThe project aims to implement crosscountry field applications for the "Application of High-Performance Renewable Energy Technologies to Combined Heat and Power Plants" under the "Safe, Clean and Efficient Energy" heading of the Horizon 2020 Program, test new equipment and technologies, and transfer know-how and experience. The activities planned within the scope of the project include the storage of geothermal fluids in liquid and vapor phases at the Kızıldere Geothermal Power Plants of Zorlu Enerji and in the Balmatt field in Belgium and to study the impacts of CSP (Concentrated Solar Power) and biomass technologies that can be integrated into the geothermal power plants on plant performance. The project is planned to be included in the main project list and implemented in the event that the Commission allocates funds for the project.

Row 3

(7.55.3.1) Method

Select from:

☑ Dedicated budget for other emissions reduction activities

(7.55.3.2) Comment

Zorlu Energy allocates a dedicated budget to emissions reduction projects, which are assessed and approved on the basis of the magnitude of the emissions reduction they deliver. Our 2026-2030 capital expenditure plan allocates approximately USD 512 million to generation capacity, all of it renewable, comprising approximately 77% wind, 20% geothermal and 3% solar. Investment decisions are reviewed by the Sustainability Committee, which meets four times a year and comprises two board members and the Chief Executive Officer. The Gökçedağ wind power plant held Gold Standard certification, and 213,000 metric tons of CO2 were certified under its sixth verification. The plant was divested on 29 December 2025 and is no longer within our operational boundary; the associated certification transferred with the asset. Carbon credits generated by our projects are sold to third parties and are not used against our own science-based targets, which the SBTi confirmed contain no carbon credits.

Row 4

(7.55.3.1) Method

Select from:

☑ Dedicated budget for low-carbon product R&D

(7.55.3.2) Comment

We allocate a dedicated budget to research and development in low-carbon energy. In the reporting year our R&D and innovation budget was 154.5 million TL, of which 839,756 TL was spent specifically on developing low-carbon products and services. Current projects include VERTI-GO, supported by Horizon Europe, which develops floating offshore wind technologies; EOLIAN, which develops fully recyclable wind turbine blades using vitrimer composites to extend blade life and enable circular use; and JESKE, which is designing an adjustable, mobile carbon injection system for geothermal wells to reduce fugitive emissions from non-condensable gases. We also continue feasibility work on full-scale deployment of the GECO carbon capture and reinjection system piloted at our Kızıldere 3 plant. These projects are selected on the basis of their potential contribution to our SBTi-validated emissions reduction targets and are reviewed by the Sustainability Committee.
[Add row]

(7.58) Describe your organization’s efforts to reduce methane emissions from your activities.

Methane is material to Zorlu Energy's emissions profile, and almost all of it arises from a single source. Fugitive non-condensable gases released with the geothermal fluid at our Kızıldere and Alaşehir geothermal power plants accounted for 876.07 metric tons of CH4 in the reporting year, equivalent to 24,442 metric tons CO2e using the IPCC Sixth Assessment Report 100-year global warming potential of 27.9. This represents 98.8% of our total methane emissions and 3.4% of our Scope 1 inventory. Methane from fuel combustion is comparatively minor: stationary combustion contributed 8.89 metric tons of CH4 and mobile combustion 0.22 metric tons. Our wind, hydroelectric and solar plants generate no methane emissions, and following the divestment of our natural gas distribution business we no longer operate any gas transmission or distribution network. Methane reduction targets: We do not have a methane-specific target. Methane is fully incorporated into our SBTi-validated targets, which cover all seven Kyoto greenhouse gases. Targets Int 1 and Int 2 in question 7.53.2 commit us to reduce Scope 1 GHG emissions intensity from electricity and heat generation by 73.71% per MWh by 2030 and 97.7% per MWh by 2040 from a 2021 base year. Because fugitive geothermal emissions dominate our Scope 1 inventory, these intensity targets are in substance methane and carbon dioxide reduction targets for our geothermal fleet: methane comprised approximately 2.6% of the total Scope 1 emissions covered by these targets in the base year, with the balance being geogenic carbon dioxide released from the

same source. Methane reduction projects and leak detection: Geothermal non-condensable gas emissions are not equipment leaks but a property of the reservoir fluid, so conventional leak detection and repair does not apply to the primary source. We quantify these emissions directly rather than estimating them: the non-condensable gas content of the flash steam is measured at each plant, the mass of each gas component is determined, and emissions are calculated on a mass basis using AR6 global warming potentials. This approach is applied because geothermal fluid composition is highly site-specific and generic emission factors would not give a representative result. Measurements form part of the data set subject to third-party limited assurance. For equipment-related fugitive sources across our fleet, including compressors, valves and flanges, we conduct visual and olfactory inspections as part of routine operations and maintenance rounds, supported by portable gas detectors at geothermal sites where hydrogen sulphide monitoring is required for occupational safety; these cover 100% of our operating assets. Case study: Under the GECO (Geothermal Emission Control) project, supported by the EU Horizon 2020 programme, we operated a pilot carbon capture and reinjection system at our Kızıldere 3 geothermal power plant in 2023. Non-condensable gases, including methane and carbon dioxide, were compressed and directed to a reinjection well rather than released to the atmosphere, capturing approximately 1,000 tonnes of CO2 equivalent during the pilot period. The system did not operate in the reporting year and feasibility work for full-scale deployment is ongoing. Building on this, we are developing JESKE, a project to design an adjustable, mobile injection system suited to a range of geothermal well configurations. Full-scale reinjection is the principal technical route by which we expect to abate residual fugitive methane and carbon dioxide at our geothermal assets, and it underpins the neutralization approach described in our net-zero target in question 7.54.3. Collaborative programmes: We do not currently participate in a methane-specific collaborative initiative such as the Global Methane Initiative or the Oil and Gas Methane Partnership. Our participation in the GECO project is conducted with an international research consortium under Horizon 2020, and results are published for the benefit of the wider geothermal sector. We will keep the case for joining a dedicated methane programme under review as Türkiye develops its emissions trading scheme.

(7.74) Do you classify any of your existing goods and/or services as low-carbon products?

Select from:

☑ Yes

(7.74.1) Provide details of your products and/or services that you classify as low-carbon products.

Row 1

(7.74.1.1) Level of aggregation

Select from:

☑ Product or service

(7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:

☑ The EU Taxonomy for environmentally sustainable economic activities

(7.74.1.3) Type of product(s) or service(s)

Power

☑ Onshore wind

(7.74.1.4) Description of product(s) or service(s)

We generate electricity from onshore wind at the Jhimpir wind power plant in Sindh, Pakistan (56.4 MW), which produced 377 GWh in the reporting year alongside our other renewable assets. We are developing further onshore wind capacity in the high-wind Thrace region of Türkiye through the Tekirdağ Yeniçiftlik and Lüleburgaz Hamitabat projects. Wind is the largest component of our forward investment plan: of the approximately USD 512 million allocated to generation capacity for 2026-2030, approximately 77% is directed to wind. Onshore wind generation produces no combustion or fugitive greenhouse gas emissions in operation.

(7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

Select from:

☑ Yes

(7.74.1.6) Methodology used to calculate avoided emissions

Select from:

☑ The Avoided Emissions Framework (AEF)

(7.74.1.7) Life cycle stage(s) covered for the low-carbon product(s) or services(s)

Select from:

☑ Gate-to-gate

(7.74.1.8) Functional unit used

1 MWh electricity generation from windpower plants.

(7.74.1.9) Reference product/service or baseline scenario used

1 MWh electricity generation from mixed national grid

(7.74.1.10) Life cycle stage(s) covered for the reference product/service or baseline scenario

Select from:

☑ Gate-to-gate

(7.74.1.11) Estimated avoided emissions (metric tons CO2e per functional unit) compared to reference product/service or baseline scenario

0.434

(7.74.1.12) Explain your calculation of avoided emissions, including any assumptions

We used an attributional approach, comparing one megawatt hour of electricity generated from our onshore wind assets against one megawatt hour supplied from the Turkish national grid mix, which represents the most likely alternative source of supply in the absence of our generation. The Turkish national average grid emission factor of 0.434 metric tons CO2e per MWh, published by the national authority and applied consistently throughout this response, was used for the reference scenario. Operational emissions from wind generation at the gate-to-gate stage are zero, as there is no fuel combustion and no fugitive release. Avoided emissions are therefore 0.434 metric tons CO2e per MWh generated. The calculation covers the gate-to-gate life cycle stage only, and the same stage is applied to both the low-carbon product and the reference scenario to ensure a like-for-like comparison. Emissions from material acquisition, turbine manufacture, construction and end-of-life are not included; a full cradle-to-grave assessment would reduce the estimated avoided emissions. We have not applied rebound or secondary enabling effects. The grid emission factor is the principal source of uncertainty, as it varies year to year with the national generation mix.

(7.74.1.13) Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year

4.6

Row 2

(7.74.1.1) Level of aggregation

Select from:

☑ Product or service

(7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:

☑ No taxonomy used to classify product(s) or service(s) as low carbon

(7.74.1.3) Type of product(s) or service(s)

Power

☑ Geothermal electricity

(7.74.1.4) Description of product(s) or service(s)

We are Türkiye's leading geothermal power producer, operating the Kızıldere I-II-III complex in Denizli and the Alaşehir plant in Manisa, which together generated 1,881 GWh in the reporting year and represent approximately 20% of the country's installed geothermal capacity. Geothermal provides firm, dispatchable renewable baseload generation, which distinguishes it from intermittent wind and solar and makes it valuable for grid stability during the energy transition. We report this as a low-carbon product because its operational emissions intensity is materially below that of the Turkish grid mix it displaces. We do not, however, classify it as aligned with the EU Taxonomy: the Taxonomy applies a threshold of 100 grams CO2e per kWh for electricity generation, and our geothermal fleet operates above that threshold because of the non-condensable gases naturally present in the reservoir fluid. The activity is taxonomy-eligible but not taxonomy-aligned, and we report it on that basis.

(7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

Select from:

☑ Yes

(7.74.1.6) Methodology used to calculate avoided emissions

Select from:

☑ The Avoided Emissions Framework (AEF)

(7.74.1.7) Life cycle stage(s) covered for the low-carbon product(s) or services(s)

Select from:

☑ Gate-to-gate

(7.74.1.8) Functional unit used

1 MWh electricity generation from geothermal plants.

(7.74.1.9) Reference product/service or baseline scenario used

1 MWh electricity generation from mixed national grid

(7.74.1.10) Life cycle stage(s) covered for the reference product/service or baseline scenario

Select from:

☑ Gate-to-gate

(7.74.1.11) Estimated avoided emissions (metric tons CO2e per functional unit) compared to reference product/service or baseline scenario

0.11

(7.74.1.12) Explain your calculation of avoided emissions, including any assumptions

We used an attributional approach, comparing one megawatt hour of electricity generated at our geothermal plants against one megawatt hour supplied from the Turkish national grid mix. The Turkish national average grid emission factor of 0.434 metric tons CO2e per MWh was applied to the reference scenario. Unlike wind, solar and hydroelectric generation, geothermal generation is not emissions-free at the point of production: non-condensable gases naturally present in the reservoir fluid, principally carbon dioxide and methane, are released with the flash steam. In the reporting year our geothermal plants emitted 610,080 metric tons CO2e against 1,881 GWh of gross generation, giving an operational emissions intensity of 0.324 metric tons CO2e per MWh. Net avoided emissions are therefore 0.434 minus 0.324, or 0.110 metric tons CO2e per MWh generated. The calculation covers the gate-to-gate life cycle stage for both the low-carbon product and the reference scenario. Emissions from drilling, construction and end-of-life are not included. We have not applied rebound or secondary enabling effects. Our SBTi-validated targets commit us to reducing Scope 1 emissions intensity from electricity and heat generation by 73.71% per MWh by 2030 and 97.7% per MWh by 2040, principally through carbon capture and reinjection of non-condensable gases at the wellhead, which would substantially increase the avoided emissions reported here.

(7.74.1.13) Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year

16.1

Row 3

(7.74.1.1) Level of aggregation

Select from:

☑ Product or service

(7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:

☑ The EU Taxonomy for environmentally sustainable economic activities

(7.74.1.3) Type of product(s) or service(s)

Power

☑ Hydropower

(7.74.1.4) Description of product(s) or service(s)

We have developed and operated hydroelectric power plants in Türkiye since 2007. Under a privatisation tender we acquired 30-year operating rights for seven hydroelectric plants: Ataköy, Beyköy, Çıldır, İkizdere, Kuzgun, Mercan and Tercan. Together they generated 323 GWh in the reporting year. Hydroelectric generation produces no combustion or fugitive greenhouse gas emissions in operation, and the plants provide flexible generation that supports grid balancing.

(7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

Select from:

☑ Yes

(7.74.1.6) Methodology used to calculate avoided emissions

Select from:

☑ The Avoided Emissions Framework (AEF)

(7.74.1.7) Life cycle stage(s) covered for the low-carbon product(s) or services(s)

Select from:

☑ Gate-to-gate

(7.74.1.8) Functional unit used

1 MWh electricity generation from hydropower plants.

(7.74.1.9) Reference product/service or baseline scenario used

1 MWh electricity generation from mixed national grid

(7.74.1.10) Life cycle stage(s) covered for the reference product/service or baseline scenario

Select from:

☑ Gate-to-gate

(7.74.1.11) Estimated avoided emissions (metric tons CO2e per functional unit) compared to reference product/service or baseline scenario

0.434

(7.74.1.12) Explain your calculation of avoided emissions, including any assumptions

We used an attributional approach, comparing one megawatt hour of electricity generated from our hydroelectric assets against one megawatt hour supplied from the Turkish national grid mix, which represents the most likely alternative source of supply in the absence of our generation. The Turkish national average grid emission factor of 0.434 metric tons CO2e per MWh, published by the national authority and applied consistently throughout this response, was used for the reference scenario. Operational emissions from hydroelectric generation at the gate-to-gate stage are zero. Avoided emissions are therefore 0.434 metric tons CO2e per MWh generated. The calculation covers the gate-to-gate life cycle stage only, and the same stage is applied to both the low-carbon product and the reference scenario to ensure a like-for-like comparison. Emissions from construction and end-of-life are not included; a full cradle-to-grave assessment would reduce the estimated avoided emissions. We have not applied rebound or secondary enabling effects. Our hydroelectric plants are run-of-river or existing-reservoir facilities and we have not identified material reservoir methane emissions; the grid emission factor remains the principal source of uncertainty.

(7.74.1.13) Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year

2.3
[Add row]

(7.79) Has your organization retired any project-based carbon credits within the reporting year?

Select from:

☑ No

C8. Environmental performance - Forests

(8.1) Are there any exclusions from your disclosure of forests-related data?

	Exclusion from disclosure
Timber products	*Select from:* ☑ No
Rubber	*Select from:* ☑ No
Coffee	*Select from:* ☑ No

[Fixed row]

(8.2) Provide a breakdown of your disclosure volume per commodity.

	Disclosure volume (metric tons)	Volume type	Sourced volume (metric tons)
Timber products	*61.81*	*Select all that apply* ☑ Sourced	*61.81*
Rubber	*1.44*	*Select all that apply* ☑ Sourced	*1.44*

	Disclosure volume (metric tons)	Volume type	Sourced volume (metric tons)
Coffee	*0.65*	*Select all that apply* ☑ Sourced	*0.65*

[Fixed row]

(8.5) Provide details on the origins of your sourced volumes.

Timber products

(8.5.1) Country/area of origin

Select from:

☑ Türkiye

(8.5.2) First level administrative division

Select from:

☑ States/equivalent jurisdictions

(8.5.3) Specify the states or equivalent jurisdictions

İstanbul; Ankara

(8.5.4) Volume sourced from country/area of origin (metric tons)

61.81

(8.5.5) Source

Select all that apply

☑ Contracted suppliers (manufacturers)

(8.5.7) Please explain

Timber volumes consist of wood-based office furniture purchased for our electricity distribution business and small quantities of wood-based consumables. Almost the entire volume, 99.9% by weight, was supplied by a single office furniture manufacturer registered in İstanbul and delivered to our buildings in Afyonkarahisar, Bilecik and Kütahya. The balance came from a furniture supplier registered in Ankara. We have traced these volumes to our tier 1 suppliers, all of which are companies registered in Türkiye, and the provinces reported are the registered locations of those suppliers. We have not traced the commodity beyond tier 1 to the point of production, so the geographic origin of the underlying fibre or crop is not known to us. Our assurance that these volumes are not associated with deforestation or conversion rests on three controls rather than on origin tracing. First, our Deforestation Combat Policy commits us to ensuring that our activities and our supply chain do not contribute to deforestation, and suppliers are required to commit to the Zorlu Holding Code of Conduct as a condition of contract. Second, suppliers designated strategic or critical are assessed through our ESG maturity assessment, which scores environmental management, certification and regulatory compliance. Third, these volumes are immaterial: together they represent less than 0.01% of procurement spend and none is an input to any product or service we supply. We are extending supplier mapping beyond tier 1 over the next two years, and will report origin at production level for any forest-risk commodity identified at deeper tiers.

Rubber

(8.5.1) Country/area of origin

Select from:

☑ Türkiye

(8.5.2) First level administrative division

Select from:

☑ States/equivalent jurisdictions

(8.5.3) Specify the states or equivalent jurisdictions

İstanbul; Aydın; Bursa; İzmir; Denizli; Eskişehir

(8.5.4) Volume sourced from country/area of origin (metric tons)

1.44

(8.5.5) Source

Select all that apply

☑ Trader/broker/commodity market

(8.5.7) Please explain

Rubber volumes consist of vehicle and forklift tyres and minor rubber components purchased from tyre dealers and industrial suppliers for use at our generation sites and in our distribution operations. By weight, 70.7% came from suppliers registered in İstanbul, 15.3% from Aydın, 8.3% from Bursa and the remainder from İzmir, Denizli and Eskişehir. Tyres are largely synthetic or mixed compounds; natural rubber is not procured as a raw input. We have traced these volumes to our tier 1 suppliers, all of which are companies registered in Türkiye, and the provinces reported are the registered locations of those suppliers. We have not traced the commodity beyond tier 1 to the point of production, so the geographic origin of the underlying fibre or crop is not known to us. Our assurance that these volumes are not associated with deforestation or conversion rests on three controls rather than on origin tracing. First, our Deforestation Combat Policy commits us to ensuring that our activities and our supply chain do not contribute to deforestation, and suppliers are required to commit to the Zorlu Holding Code of Conduct as a condition of contract. Second, suppliers designated strategic or critical are assessed through our ESG maturity assessment, which scores environmental management, certification and regulatory compliance. Third, these volumes are immaterial: together they represent less than 0.01% of procurement spend and none is an input to any product or service we supply. We are extending supplier mapping beyond tier 1 over the next two years, and will report origin at production level for any forest-risk commodity identified at deeper tiers.

Coffee

(8.5.1) Country/area of origin

Select from:

☑ Türkiye

(8.5.2) First level administrative division

Select from:

☑ States/equivalent jurisdictions

(8.5.3) Specify the states or equivalent jurisdictions

Manisa; İstanbul; İzmir; Aydın

(8.5.4) Volume sourced from country/area of origin (metric tons)

0.65

(8.5.5) Source

Select all that apply

☑ Trader/broker/commodity market

(8.5.7) Please explain

Coffee volumes are roasted and ground coffee purchased for staff consumption at our offices and generation sites, together with a small number of coffee machines. By weight, 50.1% came from suppliers registered in Manisa, 44.1% from İstanbul and the remainder from İzmir and Aydın. The coffee is roasted and blended in Türkiye; green bean origin is not disclosed on retail packaging and is not available to us as an end purchaser. We have traced these volumes to our tier 1 suppliers, all of which are companies registered in Türkiye, and the provinces reported are the registered locations of those suppliers. We have not traced the commodity beyond tier 1 to the point of production, so the geographic origin of the underlying fibre or crop is not known to us. Our assurance that these volumes are not associated with deforestation or conversion rests on three controls rather than on origin tracing. First, our Deforestation Combat Policy commits us to ensuring that our activities and our supply chain do not contribute to deforestation, and suppliers are required to commit to the Zorlu Holding Code of Conduct as a condition of contract. Second, suppliers designated strategic or critical are assessed through our ESG maturity assessment, which scores environmental management, certification and regulatory compliance. Third, these volumes are immaterial: together they represent less than 0.01% of procurement spend and none is an input to any product or service we supply. We are extending supplier mapping beyond tier 1 over the next two years, and will report origin at production level for any forest-risk commodity identified at deeper tiers.
[Add row]

(8.7) Did your organization have a no-deforestation or no-conversion target, or any other targets for sustainable production/ sourcing of your disclosed commodities, active in the reporting year?

	Active no-deforestation or no-conversion target	Other active targets related to this commodity, including any which contribute to your no-deforestation or no-conversion target
Timber products	Yes ☑ Yes, we have a no-conversion target	*Select from:* ☑ Yes, we have other targets related to this commodity
Rubber	Yes ☑ Yes, we have a no-conversion target	*Select from:*

	Active no-deforestation or no-conversion target	Other active targets related to this commodity, including any which contribute to your no-deforestation or no-conversion target
		☑ Yes, we have other targets related to this commodity
Coffee	Yes ☑ Yes, we have a no-conversion target	*Select from:* ☑ Yes, we have other targets related to this commodity

[Fixed row]

(8.7.1) Provide details on your no-deforestation or no-conversion target that was active during the reporting year.

Timber products

(8.7.1.1) No-deforestation or no-conversion target

Select from:

☑ No-conversion

(8.7.1.2) Your organization's definition of "no-deforestation" or "no-conversion"

No-conversion means that neither our own activities nor our supply chain cause or contribute to the conversion of natural ecosystems, including natural forests, after the cutoff date. We apply the definitions of conversion, deforestation and natural ecosystem set out by the Accountability Framework initiative. The land types covered are natural forests, wetlands, grasslands and steppe, which are the ecosystem types present around our operations in Türkiye and at our suppliers' locations.

(8.7.1.3) No-deforestation or no-conversion target coverage

Select from:

☑ Organization-wide (including suppliers)

(8.7.1.4) Cutoff date

Select from:

☑ 2020

(8.7.1.6) Rationale for selecting cutoff date

Select from:

☑ Region-wide agreement/recommendation

(8.7.1.7) Target date for achieving no-deforestation or no-conversion

Select from:

☑ >2030

Rubber

(8.7.1.1) No-deforestation or no-conversion target

Select from:

☑ No-conversion

(8.7.1.2) Your organization’s definition of “no-deforestation” or “no-conversion”

No-conversion means that neither our own activities nor our supply chain cause or contribute to the conversion of natural ecosystems, including natural forests, after the cutoff date. We apply the definitions of conversion, deforestation and natural ecosystem set out by the Accountability Framework initiative. The land types covered are natural forests, wetlands, grasslands and steppe, which are the ecosystem types present around our operations in Türkiye and at our suppliers' locations.

(8.7.1.3) No-deforestation or no-conversion target coverage

Select from:

☑ Organization-wide (including suppliers)

(8.7.1.4) Cutoff date

Select from:

☑ 2020

(8.7.1.6) Rationale for selecting cutoff date

Select from:

☑ Region-wide agreement/recommendation

(8.7.1.7) Target date for achieving no-deforestation or no-conversion

Select from:

☑ >2030

Coffee

(8.7.1.1) No-deforestation or no-conversion target

Select from:

☑ No-conversion

(8.7.1.2) Your organization’s definition of “no-deforestation” or “no-conversion”

No-conversion means that neither our own activities nor our supply chain cause or contribute to the conversion of natural ecosystems, including natural forests, after the cutoff date. We apply the definitions of conversion, deforestation and natural ecosystem set out by the Accountability Framework initiative. The land types covered are natural forests, wetlands, grasslands and steppe, which are the ecosystem types present around our operations in Türkiye and at our suppliers' locations.

(8.7.1.3) No-deforestation or no-conversion target coverage

Select from:

☑ Organization-wide (including suppliers)

(8.7.1.4) Cutoff date

Select from:

☑ 2020

(8.7.1.6) Rationale for selecting cutoff date

Select from:

☑ Region-wide agreement/recommendation

(8.7.1.7) Target date for achieving no-deforestation or no-conversion

Select from:

☑ >2030

[Add row]

(8.7.2) Provide details of other targets related to your commodities, including any which contribute to your no-deforestation or no-conversion target, and progress made against them.

Timber products

(8.7.2.1) Target reference number

Select from:

☑ Forests target 1

(8.7.2.2) Target contributes to no-deforestation or no-conversion target reported in 8.7.1

Select from:

☑ Yes, this target contributes to our no-conversion target

(8.7.2.3) Target coverage

Select from:

☑ Organization-wide (including suppliers)

(8.7.2.4) Commodity volume covered by target (metric tons)

Select from:

☑ Disclosure volume

(8.7.2.5) Category of target & Quantitative metric

Traceability

☑ % of volume traceable to traceability point

(8.7.2.6) Traceability point

Select from:

☑ Country/area of origin

(8.7.2.8) Date target was set

06/29/2025

(8.7.2.9) End date of base year

12/31/2024

(8.7.2.10) Base year figure

0

(8.7.2.11) End date of target

12/31/2025

(8.7.2.12) Target year figure

100

(8.7.2.13) Reporting year figure

100

(8.7.2.14) Target status in reporting year

Select from:

☑ Achieved

(8.7.2.15) % of target achieved relative to base year

100.00

(8.7.2.16) Global environmental treaties/ initiatives/ frameworks aligned with or supported by this target

Global environmental treaty/ initiative/ framework

☑ Sustainable Development Goals

(8.7.2.17) Explain target coverage and identify any exclusions

The target is organization-wide and covers our full disclosure volume for this commodity as reported in question 8.2, with no exclusions. It applies to volumes sourced by Zorlu Enerji Elektrik Üretim A.Ş. and all of its consolidated subsidiaries, including our generation, distribution, retail and head office operations. Traceability is defined here at country of origin level, meaning that every unit of the disclosed volume can be linked to a named tier 1 supplier and to the country in which that supplier is registered. The target does not extend to tracing the commodity to the production unit, which remains outside our current visibility and is addressed by our plan to extend supplier mapping beyond tier 1 over the next two years.

(8.7.2.19) List the actions which contributed most to achieving or maintaining this target

The target was achieved in full: 100% of the disclosed volume is traceable to country of origin, against a base year position in which no traceability record existed. Three actions delivered it. First, we built a commodity-level extract from our procurement system covering every purchase order line for the reporting year across all consolidated entities, and classified each line by material type so that forest-risk commodity purchases could be identified rather than estimated. Second, we established product weights for each line from supplier specifications and delivery documentation, converting to metric tons on a consistent basis, which gave us a volume rather than a spend figure. Third, we matched every purchase line to a named tier 1 supplier and to that supplier's registered location, using the supplier master data maintained for our Scope 3 Category 1 inventory. Every line matched, leaving no volume of unknown origin. We expect to maintain full country-level traceability in the following year, as the process is now embedded in the annual data collection cycle that supports both our greenhouse gas inventory and this disclosure. The next step is depth rather than coverage: extending tracing beyond tier 1 toward the production unit.

(8.7.2.20) Further details of target

The unit used in the base year, target year and reporting year figures is the percentage of the disclosure volume reported in question 8.2 that is traceable to country of origin. The base year figure of 0% reflects that no commodity-level traceability record existed at the end of 2024; volumes were monitored by procurement spend rather than by commodity and origin. The target was set as a prerequisite for our no-conversion commitment. Our Deforestation Combat Policy commits us to

ensuring that our activities and our supply chain do not contribute to deforestation, and that commitment cannot be verified without knowing where the commodity comes from. Country-level traceability is therefore the first step, and it is the step that makes the deeper tracing reported as a forward plan feasible. The target was set internally rather than against an external standard, but the traceability definitions applied follow the Accountability Framework initiative. It contributes to Sustainable Development Goal 12 on responsible consumption and production and Goal 15 on life on land. The volumes involved are immaterial to our business, together representing less than 0.01% of procurement spend, and none is an input to any product or service we supply; we nonetheless track them because our policy commitment is not conditional on materiality.

Rubber

(8.7.2.1) Target reference number

Select from:

☑ Forests target 1

(8.7.2.2) Target contributes to no-deforestation or no-conversion target reported in 8.7.1

Select from:

☑ Yes, this target contributes to our no-conversion target

(8.7.2.3) Target coverage

Select from:

☑ Organization-wide (including suppliers)

(8.7.2.4) Commodity volume covered by target (metric tons)

Select from:

☑ Disclosure volume

(8.7.2.5) Category of target & Quantitative metric

Traceability

☑ % of volume traceable to traceability point

(8.7.2.6) Traceability point

Select from:

☑ Country/area of origin

(8.7.2.8) Date target was set

06/29/2025

(8.7.2.9) End date of base year

12/31/2024

(8.7.2.10) Base year figure

0

(8.7.2.11) End date of target

12/31/2025

(8.7.2.12) Target year figure

100

(8.7.2.13) Reporting year figure

100

(8.7.2.14) Target status in reporting year

Select from:

☑ Achieved

(8.7.2.15) % of target achieved relative to base year

100.00

(8.7.2.16) Global environmental treaties/ initiatives/ frameworks aligned with or supported by this target

Global environmental treaty/ initiative/ framework

☑ Sustainable Development Goals

(8.7.2.17) Explain target coverage and identify any exclusions

The target is organization-wide and covers our full disclosure volume for this commodity as reported in question 8.2, with no exclusions. It applies to volumes sourced by Zorlu Enerji Elektrik Üretim A.Ş. and all of its consolidated subsidiaries, including our generation, distribution, retail and head office operations. Traceability is defined here at country of origin level, meaning that every unit of the disclosed volume can be linked to a named tier 1 supplier and to the country in which that supplier is registered. The target does not extend to tracing the commodity to the production unit, which remains outside our current visibility and is addressed by our plan to extend supplier mapping beyond tier 1 over the next two years.

(8.7.2.19) List the actions which contributed most to achieving or maintaining this target

The target was achieved in full: 100% of the disclosed volume is traceable to country of origin, against a base year position in which no traceability record existed. Three actions delivered it. First, we built a commodity-level extract from our procurement system covering every purchase order line for the reporting year across all consolidated entities, and classified each line by material type so that forest-risk commodity purchases could be identified rather than estimated. Second, we established product weights for each line from supplier specifications and delivery documentation, converting to metric tons on a consistent basis, which gave us a volume rather than a spend figure. Third, we matched every purchase line to a named tier 1 supplier and to that supplier's registered location, using the supplier master data maintained for our Scope 3 Category 1 inventory. Every line matched, leaving no volume of unknown origin. We expect to maintain full country-level traceability in the following year, as the process is now embedded in the annual data collection cycle that supports both our greenhouse gas inventory and this disclosure. The next step is depth rather than coverage: extending tracing beyond tier 1 toward the production unit.

(8.7.2.20) Further details of target

The unit used in the base year, target year and reporting year figures is the percentage of the disclosure volume reported in question 8.2 that is traceable to country of origin. The base year figure of 0% reflects that no commodity-level traceability record existed at the end of 2024; volumes were monitored by procurement spend rather than by commodity and origin. The target was set as a prerequisite for our no-conversion commitment. Our Deforestation Combat Policy commits us to ensuring that our activities and our supply chain do not contribute to deforestation, and that commitment cannot be verified without knowing where the commodity comes from. Country-level traceability is therefore the first step, and it is the step that makes the deeper tracing reported as a forward plan feasible. The target was set internally rather than against an external standard, but the traceability definitions applied follow the Accountability Framework initiative. It contributes to Sustainable Development Goal 12 on responsible consumption and production and Goal 15 on life on land. The volumes involved are immaterial to our business, together representing less than 0.01% of procurement spend, and none is an input to any product or service we supply; we nonetheless track them because our policy commitment is not conditional on materiality.

Coffee

(8.7.2.1) Target reference number

Select from:

☑ Forests target 1

(8.7.2.2) Target contributes to no-deforestation or no-conversion target reported in 8.7.1

Select from:

☑ Yes, this target contributes to our no-conversion target

(8.7.2.3) Target coverage

Select from:

☑ Organization-wide (including suppliers)

(8.7.2.4) Commodity volume covered by target (metric tons)

Select from:

☑ Disclosure volume

(8.7.2.5) Category of target & Quantitative metric

Traceability

☑ % of volume traceable to traceability point

(8.7.2.6) Traceability point

Select from:

☑ Country/area of origin

(8.7.2.8) Date target was set

06/29/2025

(8.7.2.9) End date of base year

12/31/2024

(8.7.2.10) Base year figure

0

(8.7.2.11) End date of target

12/31/2025

(8.7.2.12) Target year figure

100

(8.7.2.13) Reporting year figure

100

(8.7.2.14) Target status in reporting year

Select from:
☑ Achieved

(8.7.2.15) % of target achieved relative to base year

100.00

(8.7.2.16) Global environmental treaties/ initiatives/ frameworks aligned with or supported by this target

Global environmental treaty/ initiative/ framework
☑ Sustainable Development Goals

(8.7.2.17) Explain target coverage and identify any exclusions

The target is organization-wide and covers our full disclosure volume for this commodity as reported in question 8.2, with no exclusions. It applies to volumes sourced by Zorlu Enerji Elektrik Üretim A.Ş. and all of its consolidated subsidiaries, including our generation, distribution, retail and head office operations. Traceability is defined here at country of origin level, meaning that every unit of the disclosed volume can be linked to a named tier 1 supplier and to the country in which that supplier is registered. The target does not extend to tracing the commodity to the production unit, which remains outside our current visibility and is addressed by our plan to extend supplier mapping beyond tier 1 over the next two years.

(8.7.2.19) List the actions which contributed most to achieving or maintaining this target

The target was achieved in full: 100% of the disclosed volume is traceable to country of origin, against a base year position in which no traceability record existed. Three actions delivered it. First, we built a commodity-level extract from our procurement system covering every purchase order line for the reporting year across all consolidated entities, and classified each line by material type so that forest-risk commodity purchases could be identified rather than estimated. Second, we established product weights for each line from supplier specifications and delivery documentation, converting to metric tons on a consistent basis, which gave us a volume rather than a spend figure. Third, we matched every purchase line to a named tier 1 supplier and to that supplier's registered location, using the supplier master data maintained for our Scope 3 Category 1 inventory. Every line matched, leaving no volume of unknown origin. We expect to maintain full country-level traceability in the following year, as the process is now embedded in the annual data collection cycle that supports both our greenhouse gas inventory and this disclosure. The next step is depth rather than coverage: extending tracing beyond tier 1 toward the production unit.

(8.7.2.20) Further details of target

The unit used in the base year, target year and reporting year figures is the percentage of the disclosure volume reported in question 8.2 that is traceable to country of origin. The base year figure of 0% reflects that no commodity-level traceability record existed at the end of 2024; volumes were monitored by procurement spend rather than by commodity and origin. The target was set as a prerequisite for our no-conversion commitment. Our Deforestation Combat Policy commits us to ensuring that our activities and our supply chain do not contribute to deforestation, and that commitment cannot be verified without knowing where the commodity comes from. Country-level traceability is therefore the first step, and it is the step that makes the deeper tracing reported as a forward plan feasible. The target was set internally rather than against an external standard, but the traceability definitions applied follow the Accountability Framework initiative. It contributes to Sustainable Development Goal 12 on responsible consumption and production and Goal 15 on life on land. The volumes involved are immaterial to our business, together representing less than 0.01% of procurement spend, and none is an input to any product or service we supply; we nonetheless track them because our policy commitment is not conditional on materiality.
[Add row]

(8.8) Indicate if your organization has a traceability system to determine the origins of your sourced volumes and provide details of the methods and tools used.

Timber products

(8.8.1) Traceability system

Select from:

☑ Yes

(8.8.2) Methods/tools used in traceability system

Select all that apply

☑ Value chain mapping

☑ Supplier engagement/communication

☑ Internal traceability system

(8.8.3) Description of methods/tools used in traceability system

Our traceability system is internal and built on the supplier and purchase order master data held in our SAP procurement system, which covers every consolidated entity in our reporting boundary. Each purchase order line carries a material description, a quantity, a named tier 1 supplier and that supplier's registered location. For forest-risk commodities we classify each line by material type, apply a product weight taken from supplier specifications or delivery documentation, convert to metric tons, and aggregate by supplier and by province. This is the same dataset that supports our Scope 3 Category 1 inventory, so the supplier records are maintained continuously rather than reconstructed at year end. Value chain mapping is applied on top of this: we map each commodity purchase to the supplier's registered province and to the receiving site, which is how the country and province breakdown reported in question 8.5 was produced. Every purchase line for the reporting year matched to a named supplier, leaving no volume of unknown origin. Supplier engagement supplements the system where documentation is incomplete. Suppliers designated strategic or critical complete our ESG maturity assessment annually, which collects environmental management, certification and regulatory compliance information, and our contracts require suppliers to commit to the Zorlu Holding Code of Conduct and to the environmental specifications attached to each procurement category. For timber the system traces to the furniture manufacturer and the distributors that supplied wood-based consumables. We do not currently trace the wood fibre embedded in finished furniture back to the forest of origin, and extending mapping beyond tier 1 is our stated next step.

Rubber

(8.8.1) Traceability system

Select from:

☑ Yes

(8.8.2) Methods/tools used in traceability system

Select all that apply

☑ Value chain mapping

☑ Supplier engagement/communication

☑ Internal traceability system

(8.8.3) Description of methods/tools used in traceability system

Our traceability system is internal and built on the supplier and purchase order master data held in our SAP procurement system, which covers every consolidated entity in our reporting boundary. Each purchase order line carries a material description, a quantity, a named tier 1 supplier and that supplier's registered location. For forest-risk commodities we classify each line by material type, apply a product weight taken from supplier specifications or delivery documentation, convert to metric tons, and aggregate by supplier and by province. This is the same dataset that supports our Scope 3 Category 1 inventory, so the supplier records are maintained continuously rather than reconstructed at year end. Value chain mapping is applied on top of this: we map each commodity purchase to the supplier's registered province and to the receiving site, which is how the country and province breakdown reported in question 8.5 was produced. Every purchase line for the reporting year matched to a named supplier, leaving no volume of unknown origin. Supplier engagement supplements the system where documentation is incomplete. Suppliers designated strategic or critical complete our ESG maturity assessment annually, which collects environmental management, certification and regulatory compliance information, and our contracts require suppliers to commit to the Zorlu Holding Code of Conduct and to the environmental specifications attached to each procurement category. For rubber the system traces to the tyre dealers and industrial suppliers we purchase from. Tyres are largely synthetic or mixed compounds and we do not trace the natural rubber fraction back to plantation level; extending mapping beyond tier 1 is our stated next step.

Coffee

(8.8.1) Traceability system

Select from:

☑ Yes

(8.8.2) Methods/tools used in traceability system

Select all that apply

☑ Value chain mapping

☑ Supplier engagement/communication

☑ Internal traceability system

(8.8.3) Description of methods/tools used in traceability system

Our traceability system is internal and built on the supplier and purchase order master data held in our SAP procurement system, which covers every consolidated entity in our reporting boundary. Each purchase order line carries a material description, a quantity, a named tier 1 supplier and that supplier's registered location. For forest-risk commodities we classify each line by material type, apply a product weight taken from supplier specifications or delivery documentation, convert to metric tons, and aggregate by supplier and by province. This is the same dataset that supports our Scope 3 Category 1 inventory, so the supplier records are maintained continuously rather than reconstructed at year end. Value chain mapping is applied on top of this: we map each commodity purchase to the supplier's registered province and to the receiving site, which is how the country and province breakdown reported in question 8.5 was produced. Every purchase line for the reporting year matched to a named supplier, leaving no volume of unknown origin. Supplier engagement supplements the system where documentation is incomplete. Suppliers designated strategic or critical complete our ESG maturity assessment annually, which collects environmental management, certification and regulatory compliance information, and our contracts require suppliers to commit to the Zorlu Holding Code of Conduct and to the environmental specifications attached to each procurement category. For coffee the system traces to the distributors and roasters we purchase from. Green bean origin is not disclosed on retail packaging and is not available to us as an end purchaser, so tracing beyond the roaster is not currently possible through our own records.
[Fixed row]

(8.8.1) Provide details of the point to which your organization can trace its sourced volumes.

Timber products

(8.8.1.1) % of sourced volume traceable to production unit

0

(8.8.1.2) % of sourced volume traceable to sourcing area and not to production unit

0

(8.8.1.3) % sourced volume traceable to country/area of origin and not to sourcing area or production unit

100

(8.8.1.4) % of sourced volume traceable to other point (i.e., processing facility/first importer) not in the country/area of origin

0

(8.8.1.5) % of sourced volume from unknown origin

0

(8.8.1.6) % of sourced volume reported

100.00

Rubber

(8.8.1.1) % of sourced volume traceable to production unit

0

(8.8.1.2) % of sourced volume traceable to sourcing area and not to production unit

0

(8.8.1.3) % sourced volume traceable to country/area of origin and not to sourcing area or production unit

100

(8.8.1.4) % of sourced volume traceable to other point (i.e., processing facility/first importer) not in the country/area of origin

0

(8.8.1.5) % of sourced volume from unknown origin

0

(8.8.1.6) % of sourced volume reported

100.00

Coffee

(8.8.1.1) % of sourced volume traceable to production unit

0

(8.8.1.2) % of sourced volume traceable to sourcing area and not to production unit

0

(8.8.1.3) % sourced volume traceable to country/area of origin and not to sourcing area or production unit

100

(8.8.1.4) % of sourced volume traceable to other point (i.e., processing facility/first importer) not in the country/area of origin

0

(8.8.1.5) % of sourced volume from unknown origin

0

(8.8.1.6) % of sourced volume reported

100.00
[Fixed row]

(8.9) Provide details of your organization's assessment of the deforestation-free (DF) or deforestation- and conversion-free (DCF) status of its disclosed commodities.

Timber products

(8.9.1) DF/DCF status assessed for this commodity

Select from:
☑ No, but we plan to do so within the next two years

(8.9.6) Is a proportion of your disclosure volume certified through a scheme not providing full DF/DCF assurance?

Select from:

☑ No

(8.9.7) Primary reason for not assessing DF/DCF status

Select from:

☑ No standardized procedure

(8.9.8) Explain why you have not assessed DF/DCF status

We have not yet assessed the deforestation- and conversion-free status of these volumes because no standardised procedure exists for doing so in respect of the goods concerned, and because our traceability currently stops at tier 1. Timber reaches us as finished goods not for resale: wood-based office furniture and small quantities of wood-based consumables, purchased from domestic manufacturers and distributors. Assessing DCF status requires tracing the material to a production unit or to a defined sourcing area and then determining whether deforestation or conversion occurred there after the 2020 cutoff date reported in question 8.7.1. As reported in question 8.8.1, 100% of our volume is traceable to country of origin but none to a sourcing area or production unit, so the evidence base for a DCF determination does not yet exist. Certification is not an alternative route here: the goods we buy are not supplied under a chain-of-custody scheme providing full DCF assurance. We plan to address this within the next two years through two steps. First, we will extend supplier mapping beyond tier 1, beginning with the office furniture manufacturer that accounts for 99.9% of our timber volume, so that the origin of the wood fibre in finished furniture can be established. Second, we will incorporate a requirement for evidence of DCF status, or of certification under a scheme providing full DCF assurance, into the technical specifications attached to procurement of forest-risk goods. Both steps are consistent with our Deforestation Combat Policy, which commits us to ensuring that our activities and our supply chain do not contribute to deforestation. These volumes are immaterial to our business, together representing less than 0.01% of procurement spend, and none is an input to any product or service we supply. We nonetheless intend to complete the assessment, because our policy commitment is not conditional on materiality.

Rubber

(8.9.1) DF/DCF status assessed for this commodity

Select from:

☑ No, but we plan to do so within the next two years

(8.9.6) Is a proportion of your disclosure volume certified through a scheme not providing full DF/DCF assurance?

Select from:

☑ No

(8.9.7) Primary reason for not assessing DF/DCF status

Select from:

☑ No standardized procedure

(8.9.8) Explain why you have not assessed DF/DCF status

We have not yet assessed the deforestation- and conversion-free status of these volumes because no standardised procedure exists for doing so in respect of the goods concerned, and because our traceability currently stops at tier 1. Rubber reaches us as finished goods: vehicle and forklift tyres and minor rubber components, purchased from domestic tyre dealers and industrial suppliers. Tyres are largely synthetic or mixed compounds and natural rubber is not procured as a raw input. Assessing DCF status requires tracing the material to a production unit or to a defined sourcing area and then determining whether deforestation or conversion occurred there after the 2020 cutoff date reported in question 8.7.1. As reported in question 8.8.1, 100% of our volume is traceable to country of origin but none to a sourcing area or production unit, so the evidence base for a DCF determination does not yet exist. Certification is not an alternative route here: the goods we buy are not supplied under a chain-of-custody scheme providing full DCF assurance. We plan to address this within the next two years through two steps. First, we will extend supplier mapping beyond tier 1 to the tyre manufacturers behind our dealers, so that the natural rubber fraction and its origin can be established. Second, we will incorporate a requirement for evidence of DCF status, or of certification under a scheme providing full DCF assurance, into the technical specifications attached to procurement of forest-risk goods. Both steps are consistent with our Deforestation Combat Policy, which commits us to ensuring that our activities and our supply chain do not contribute to deforestation. These volumes are immaterial to our business, together representing less than 0.01% of procurement spend, and none is an input to any product or service we supply. We nonetheless intend to complete the assessment, because our policy commitment is not conditional on materiality.

Coffee

(8.9.1) DF/DCF status assessed for this commodity

Select from:

☑ No, but we plan to do so within the next two years

(8.9.6) Is a proportion of your disclosure volume certified through a scheme not providing full DF/DCF assurance?

Select from:

☑ No

(8.9.7) Primary reason for not assessing DF/DCF status

Select from:

☑ No standardized procedure

(8.9.8) Explain why you have not assessed DF/DCF status

We have not yet assessed the deforestation- and conversion-free status of these volumes because no standardised procedure exists for doing so in respect of the goods concerned, and because our traceability currently stops at tier 1. Coffee reaches us as roasted and ground retail product purchased from domestic distributors for staff consumption, together with a small number of coffee machines. Assessing DCF status requires tracing the material to a production unit or to a defined sourcing area and then determining whether deforestation or conversion occurred there after the 2020 cutoff date reported in question 8.7.1. As reported in question 8.8.1, 100% of our volume is traceable to country of origin but none to a sourcing area or production unit, so the evidence base for a DCF determination does not yet exist. Certification is not an alternative route here: the goods we buy are not supplied under a chain-of-custody scheme providing full DCF assurance. We plan to address this within the next two years through two steps. First, we will approach the roasters behind our distributors for green bean origin information, which is not disclosed on retail packaging and is therefore unavailable to us as an end purchaser. Second, we will incorporate a requirement for evidence of DCF status, or of certification under a scheme providing full DCF assurance, into the technical specifications attached to procurement of forest-risk goods. Both steps are consistent with our Deforestation Combat Policy, which commits us to ensuring that our activities and our supply chain do not contribute to deforestation. These volumes are immaterial to our business, together representing less than 0.01% of procurement spend, and none is an input to any product or service we supply. We nonetheless intend to complete the assessment, because our policy commitment is not conditional on materiality.
[Fixed row]

(8.10) Indicate whether you have monitored or estimated the deforestation and conversion of other natural ecosystems footprint for your disclosed commodities.

Timber products

(8.10.1) Monitoring or estimating your deforestation and conversion footprint

Select from:

☑ No, but we plan to monitor or estimate our deforestation and conversion footprint in the next two years

(8.10.2) Primary reason for not monitoring or estimating deforestation and conversion footprint

Select from:

☑ No standardized procedure

(8.10.3) Explain why you do not monitor or estimate your deforestation and conversion footprint

We do not yet monitor or estimate a deforestation and conversion footprint for this commodity because no standardised procedure exists for doing so in respect of the goods we buy, and because quantifying a footprint in hectares requires a link to land that we cannot currently establish. Timber reaches us as finished goods not for

resale: wood-based office furniture and small quantities of wood-based consumables. The land area associated with the wood fibre embedded in a finished item of furniture is not disclosed by the manufacturer and is not derivable from the purchase record. A footprint estimate requires either the boundaries of the production units supplying the material, or a land-use coefficient applied to a known sourcing area. As reported in question 8.8.1, 100% of our volume is traceable to country of origin but none to a sourcing area or production unit, so neither route is available to us at present. Applying a generic land-use factor to the volume without any origin information would produce a number, but not an estimate we could stand behind or act on. We plan to address this within the next two years alongside the work described in question 8.9. Extending supplier mapping beyond tier 1 is the prerequisite: once the origin of the material is known at sourcing area level, a footprint can be estimated using land-use coefficients appropriate to that origin, and the result can be tracked against the 2020 cutoff date reported in question 8.7.1. We will also review whether our biodiversity and ecosystem risk assessment methodology, which we already apply to the land around our own generation and grid assets, can be extended to cover supply-chain land use. These volumes are immaterial to our business, together representing less than 0.01% of procurement spend, and none is an input to any product or service we supply. We nonetheless intend to complete the work, because our Deforestation Combat Policy commits us to ensuring that our activities and our supply chain do not contribute to deforestation, and that commitment is not conditional on materiality.

Rubber

(8.10.1) Monitoring or estimating your deforestation and conversion footprint

Select from:

☑ No, but we plan to monitor or estimate our deforestation and conversion footprint in the next two years

(8.10.2) Primary reason for not monitoring or estimating deforestation and conversion footprint

Select from:

☑ No standardized procedure

(8.10.3) Explain why you do not monitor or estimate your deforestation and conversion footprint

We do not yet monitor or estimate a deforestation and conversion footprint for this commodity because no standardised procedure exists for doing so in respect of the goods we buy, and because quantifying a footprint in hectares requires a link to land that we cannot currently establish. Rubber reaches us as finished goods: vehicle and forklift tyres and minor rubber components. Tyres are largely synthetic or mixed compounds, so the natural rubber fraction, which is the part with a land footprint, is not separately identified on the purchase record. A footprint estimate requires either the boundaries of the production units supplying the material, or a land-use coefficient applied to a known sourcing area. As reported in question 8.8.1, 100% of our volume is traceable to country of origin but none to a sourcing area or production unit, so neither route is available to us at present. Applying a generic land-use factor to the volume without any origin information would produce a number, but not an estimate we could stand behind or act on. We plan to address this within the next two years alongside the work described in question 8.9. Extending supplier mapping beyond tier 1 is the prerequisite: once the origin of the material is known at sourcing area level, a footprint can be estimated using land-use coefficients appropriate to that origin, and the result can be tracked against the 2020 cutoff date reported in question 8.7.1. We will also review whether our biodiversity and ecosystem risk assessment methodology, which we already apply to the land around our own generation and grid assets, can be extended to cover supply-chain land use. These volumes are immaterial to our business, together representing less than 0.01% of procurement spend, and none is an input to any

product or service we supply. We nonetheless intend to complete the work, because our Deforestation Combat Policy commits us to ensuring that our activities and our supply chain do not contribute to deforestation, and that commitment is not conditional on materiality.

Coffee

(8.10.1) Monitoring or estimating your deforestation and conversion footprint

Select from:

☑ No, but we plan to monitor or estimate our deforestation and conversion footprint in the next two years

(8.10.2) Primary reason for not monitoring or estimating deforestation and conversion footprint

Select from:

☑ No standardized procedure

(8.10.3) Explain why you do not monitor or estimate your deforestation and conversion footprint

We do not yet monitor or estimate a deforestation and conversion footprint for this commodity because no standardised procedure exists for doing so in respect of the goods we buy, and because quantifying a footprint in hectares requires a link to land that we cannot currently establish. Coffee reaches us as roasted and ground retail product for staff consumption. Green bean origin is not disclosed on retail packaging, so the cultivated area associated with the volume cannot be located. A footprint estimate requires either the boundaries of the production units supplying the material, or a land-use coefficient applied to a known sourcing area. As reported in question 8.8.1, 100% of our volume is traceable to country of origin but none to a sourcing area or production unit, so neither route is available to us at present. Applying a generic land-use factor to the volume without any origin information would produce a number, but not an estimate we could stand behind or act on. We plan to address this within the next two years alongside the work described in question 8.9. Extending supplier mapping beyond tier 1 is the prerequisite: once the origin of the material is known at sourcing area level, a footprint can be estimated using land-use coefficients appropriate to that origin, and the result can be tracked against the 2020 cutoff date reported in question 8.7.1. We will also review whether our biodiversity and ecosystem risk assessment methodology, which we already apply to the land around our own generation and grid assets, can be extended to cover supply-chain land use. These volumes are immaterial to our business, together representing less than 0.01% of procurement spend, and none is an input to any product or service we supply. We nonetheless intend to complete the work, because our Deforestation Combat Policy commits us to ensuring that our activities and our supply chain do not contribute to deforestation, and that commitment is not conditional on materiality.
[Fixed row]

(8.11) For volumes not assessed and determined as deforestation- and conversion-free (DCF), indicate if you have taken actions in the reporting year to increase production or sourcing of DCF volumes.

	Actions taken to increase production or sourcing of DCF volumes
Timber products	*Select from:* ☑ Yes
Rubber	*Select from:* ☑ Yes
Coffee	*Select from:* ☑ Yes

[Fixed row]

(8.11.1) Provide details of actions taken in the reporting year to assess and increase production/sourcing of deforestation- and conversion-free (DCF) volumes.

Timber products

(8.11.1.1) Action type

Select from:
☑ Increasing traceability

(8.11.1.2) % of disclosure volume that is covered by this action

100

(8.11.1.3) Indicate whether you had any major barriers or challenges related to this action in the reporting year

Select from:
☑ Yes

(8.11.1.4) Main measures identified to manage or resolve the challenges

Select all that apply

☑ Greater supplier awareness/engagement

☑ Greater transparency

☑ Investment in monitoring tools and traceability systems

☑ Improvement in data collection and quality

(8.11.1.5) Provide further details on the actions taken, their contribution to achieving DCF status, and any related barriers or challenges

None of our disclosure volume was determined as DCF in the reporting year, so this action covers 100% of it. During 2025 we built commodity-level traceability from the ground up. We extracted every purchase order line for the year across all consolidated entities, classified each line by material type so that forest-risk purchases could be identified rather than estimated, established product weights from supplier specifications and delivery documentation, converted to metric tons, and matched every line to a named tier 1 supplier and that supplier's registered province. Every line matched, taking country-level traceability from 0% at the end of 2024 to 100% at the end of 2025. This is reported as an achieved target in question 8.7.2. Traceability does not itself confer DCF status, but it is the precondition for it: without knowing which supplier a volume came from, no DCF determination is possible. The work establishes the supplier list against which origin can now be pursued. Our interim milestone is to extend mapping beyond tier 1 within two years, after which a DCF assessment against the 2020 cutoff date reported in question 8.7.1 becomes feasible. We do not expect to reach DCF status for these volumes before that mapping is complete. The principal barrier is that timber reaches us embedded in finished furniture. The manufacturer does not disclose the origin of the wood fibre or the panel supplier, and the purchase record carries no information below the finished product. A single manufacturer accounts for 99.9% of the volume, which makes the barrier concentrated and therefore tractable. The measures we have identified are to embed the commodity extract in the annual data cycle that already supports our greenhouse gas inventory, so the dataset is maintained rather than rebuilt; to raise the question of material origin directly with the small number of suppliers that account for the great majority of each commodity volume; and to add a requirement for origin and DCF evidence to the technical specifications attached to procurement of forest-risk goods. The first is already in place; the second and third are planned for the next two procurement cycles.

Rubber

(8.11.1.1) Action type

Select from:

☑ Increasing traceability

(8.11.1.2) % of disclosure volume that is covered by this action

100

(8.11.1.3) Indicate whether you had any major barriers or challenges related to this action in the reporting year

Select from:

☑ Yes

(8.11.1.4) Main measures identified to manage or resolve the challenges

Select all that apply

☑ Greater supplier awareness/engagement

☑ Greater transparency

☑ Investment in monitoring tools and traceability systems

☑ Improvement in data collection and quality

(8.11.1.5) Provide further details on the actions taken, their contribution to achieving DCF status, and any related barriers or challenges

None of our disclosure volume was determined as DCF in the reporting year, so this action covers 100% of it. During 2025 we built commodity-level traceability from the ground up. We extracted every purchase order line for the year across all consolidated entities, classified each line by material type so that forest-risk purchases could be identified rather than estimated, established product weights from supplier specifications and delivery documentation, converted to metric tons, and matched every line to a named tier 1 supplier and that supplier's registered province. Every line matched, taking country-level traceability from 0% at the end of 2024 to 100% at the end of 2025. This is reported as an achieved target in question 8.7.2. Traceability does not itself confer DCF status, but it is the precondition for it: without knowing which supplier a volume came from, no DCF determination is possible. The work establishes the supplier list against which origin can now be pursued. Our interim milestone is to extend mapping beyond tier 1 within two years, after which a DCF assessment against the 2020 cutoff date reported in question 8.7.1 becomes feasible. We do not expect to reach DCF status for these volumes before that mapping is complete. The principal barrier is that rubber reaches us as finished tyres and components bought from dealers rather than manufacturers. The natural rubber fraction, which is the part with a land footprint, is not separately identified, and the dealers do not hold plantation-level information. The measures we have identified are to embed the commodity extract in the annual data cycle that already supports our greenhouse gas inventory, so the dataset is maintained rather than rebuilt; to raise the question of material origin directly with the small number of suppliers that account for the great majority of each commodity volume; and to add a requirement for origin and DCF evidence to the technical specifications attached to procurement of forest-risk goods. The first is already in place; the second and third are planned for the next two procurement cycles.

Coffee

(8.11.1.1) Action type

Select from:

☑ Increasing traceability

(8.11.1.2) % of disclosure volume that is covered by this action

100

(8.11.1.3) Indicate whether you had any major barriers or challenges related to this action in the reporting year

Select from:

☑ Yes

(8.11.1.4) Main measures identified to manage or resolve the challenges

Select all that apply

☑ Greater supplier awareness/engagement

☑ Greater transparency

☑ Investment in monitoring tools and traceability systems

☑ Improvement in data collection and quality

(8.11.1.5) Provide further details on the actions taken, their contribution to achieving DCF status, and any related barriers or challenges

None of our disclosure volume was determined as DCF in the reporting year, so this action covers 100% of it. During 2025 we built commodity-level traceability from the ground up. We extracted every purchase order line for the year across all consolidated entities, classified each line by material type so that forest-risk purchases could be identified rather than estimated, established product weights from supplier specifications and delivery documentation, converted to metric tons, and matched every line to a named tier 1 supplier and that supplier's registered province. Every line matched, taking country-level traceability from 0% at the end of 2024 to 100% at the end of 2025. This is reported as an achieved target in question 8.7.2. Traceability does not itself confer DCF status, but it is the precondition for it: without knowing which supplier a volume came from, no DCF determination is possible. The work establishes the supplier list against which origin can now be pursued. Our interim milestone is to extend mapping beyond tier 1 within two years, after which a DCF assessment against the 2020 cutoff date reported in question 8.7.1 becomes feasible. We do not expect to reach DCF status for these volumes before that mapping is complete. The principal barrier is that green bean origin is not disclosed on retail packaging and is not available to an end purchaser. Roasted retail coffee is typically a blend of multiple origins that changes between production batches, so origin cannot be fixed to a volume even in principle without information from the roaster. The measures we have identified are to embed the commodity extract in the annual data cycle that already supports our greenhouse gas inventory, so the dataset is maintained rather than rebuilt; to raise the question of material origin directly with the small number of suppliers that account for the great majority of each commodity volume; and to add a requirement for origin and DCF evidence to the technical specifications attached to procurement of forest-risk goods. The first is already in place; the second and third are planned for the next two procurement cycles.

[Add row]

(8.14) Indicate if you assess your own compliance and/or the compliance of your suppliers with forest regulations and/or mandatory standards, and provide details.

(8.14.1) Assess legal compliance with forest regulations

Select from:

☑ Yes, from suppliers

(8.14.2) Aspects of legislation considered

Select all that apply

☑ Labor rights

☑ Land use rights

☑ Third parties' rights

☑ Environmental protection

☑ Human rights protected under international law

☑ Forest-related rules, including forest management and biodiversity conservation, where directly related to wood harvesting

☑ The principle of free, prior and informed consent (FPIC), including as set out in the UN Declaration on the Rights of Indigenous Peoples

(8.14.3) Procedure to ensure legal compliance

Select all that apply

☑ First party audits

☑ Second party audits

☑ Supplier self-declaration

(8.14.5) Please explain

All of our forest-risk commodity volume is sourced rather than produced, so our assessment is directed at suppliers. We hold no land on which forest-risk commodities are grown or harvested. Laws and standards considered. Our suppliers are established in Türkiye and the primary instruments we assess against are the Forest Law No. 6831, which governs the harvesting and trade of timber and the protection of state forests; the Environmental Law No. 2872 and the Regulation

on Environmental Impact Assessment issued under it; the Labour Law No. 4857 and the Occupational Health and Safety Law No. 6331; and the provisions of the Turkish Commercial Code and tax legislation relevant to lawful trading. Where a supplier imports material we also expect compliance with the customs and trade regulations applicable to that import. Our contractual requirements additionally reference internationally recognised human rights, the United Nations Guiding Principles on Business and Human Rights, the fundamental labour standards of the International Labour Organization, the customary rights of local communities and indigenous peoples to land and resources, and the principle of Free, Prior and Informed Consent, all of which are set out in our Deforestation Combat Policy. Procedure. Legal compliance is assessed at three points. At pre-qualification, suppliers must hold the trade registration, tax registration and sector permits appropriate to their activity, and must commit to the Zorlu Holding Code of Conduct and to our supplier principles as a condition of being admitted to the approved supplier list. At contract award, environmental requirements set out in the technical specification for each procurement category are incorporated into the agreement, including compliance with applicable environmental legislation, and we reserve the right to audit compliance against them. During the relationship, suppliers designated strategic or critical complete our ESG maturity assessment, which is a structured self-declaration covering environmental management, certification and regulatory compliance, and which is reviewed and scored by our own personnel. Where the assessment identifies a gap, an improvement action plan is agreed with the supplier and shared with the Procurement Directorate, and progress is tracked. Suspension or removal from the approved supplier list is applied only where a supplier declines to engage or fails to remedy a material breach. Prioritisation. We do not currently prioritise specific jurisdictions on deforestation risk, because all of our forest-risk commodity volume is sourced from suppliers registered in Türkiye and none of it originates, so far as we are able to establish, from a jurisdiction we have identified as high deforestation risk. As reported in question 8.8.1, our traceability reaches country of origin but not the production unit, so jurisdictional prioritisation below country level is not yet possible. Extending supplier mapping beyond tier 1 within the next two years will make it possible, and we expect to introduce risk-based prioritisation at that point. Brazilian Forest Code. We source no forest-risk commodity volume from Brazil, so no data is collected on compliance with the Brazilian Forest Code and the indicator is not applicable to us. Limitations. This assessment establishes the legal standing and environmental management of our tier 1 suppliers. It does not extend to the legality of harvesting at the point where the wood fibre, natural rubber or coffee was produced, which sits beyond our current visibility and is addressed by the traceability work reported in questions 8.9, 8.10 and 8.11.1.
[Fixed row]

(8.15) Do you engage in landscape (including jurisdictional) initiatives to progress shared sustainable land use goals?

	Engagement in landscape/jurisdictional initiatives
	Select from: ☑ Yes, we engage in landscape/jurisdictional initiatives

[Fixed row]

(8.15.1) Indicate the criteria you consider when prioritizing landscapes and jurisdictions for engagement in collaborative approaches to sustainable land use and provide an explanation.

(8.15.1.1) Criteria for prioritizing landscapes/jurisdictions for engagement

Select all that apply

☑ Risk of fires

☑ Risk of biodiversity loss ecosystems

☑ Organization has operational presence in area

☑ Presence of a neutral convener or implementer

☑ Opportunity to protect and restore natural ecosystems

☑ Ability to contribute to/ build on existing landscape/jurisdictional initiatives

☑ Risk of deforestation, forests/land degradation, or conversion of other natural

(8.15.1.2) Explain your process for prioritizing landscapes/jurisdictions for engagement

Our forest-risk commodity volumes are immaterial and reach us as finished goods from domestic distributors, so we do not prioritise landscapes on the basis of a sourcing footprint. We prioritise instead on where our own land-use impact occurs and where restoration will do the most good. The starting point is our biodiversity and ecosystem risk assessment, conducted using the TNFD framework, which quantifies the land area under forest permits associated with our generation and grid assets. That footprint is currently 3,318.8 hectares, concentrated in our distribution network at 2,751.3 hectares, our Pakistan wind operation at 464.6 hectares and Gökçedağ wind at 97.9 hectares. It defines the scale of restoration we need to deliver and it is the reason we measure our Net Positive Impact position in hectares rather than in sapling counts. Within that, four criteria narrow the choice of site. Degradation and fire risk. We direct planting to state forest land that has been burnt or degraded rather than to land that is already forested, because restoration of a degraded site adds ecosystem function where it has been lost. Several of our established sites, including Nurdağı in Gaziantep and Ayvalık in Balıkesir, are in regions with recurrent wildfire. Operational presence and ecological comparability. We favour sites in the same regions as our operations and in comparable ecosystems, so that restoration offsets our footprint in like-for-like terms rather than as a generic offset elsewhere. Sarayköy in Denizli sits in the same basin as our Kızıldere geothermal complex, and Salihli in Manisa in the same basin as Alaşehir. Biodiversity value. Species mixes are prescribed by the forest authority for each site and are selected for native suitability. Where our operations sit next to a species of conservation concern we act at that location directly, as with the conservation programme for the yellow bumblebee plant around Kızıldere III, run with Pamukkale University, which contributed to the species being listed on the IUCN Red List. Presence of a credible convener. We only engage where the General Directorate of Forestry, as the state forest authority, designates the site, prescribes the species, supervises the work and accepts it. This gives the initiative technical authority and independent monitoring that we could not provide ourselves, and it means our contribution builds on an existing national afforestation programme rather than creating a parallel one.
[Fixed row]

(8.15.2) Provide details of your engagement with landscape/jurisdictional initiatives to increase sustainable land use during the reporting year.

Row 1

(8.15.2.1) Landscape/jurisdiction ID

Select from:

☑ LJ1

(8.15.2.2) Name of initiative

Zero Carbon Footprint Forests Project (Sıfır Karbon Ayak İzi Ormanları Projesi), delivered through Mehmet Zorlu Foundation memorial forest protocols with the General Directorate of Forestry

(8.15.2.3) Country/area

Select from:

☑ Türkiye

(8.15.2.4) Latitude

38.4833

(8.15.2.5) Longitude

28.14

(8.15.2.6) Name of landscape or jurisdiction area

Afforestation areas designated by the General Directorate of Forestry in the districts of Tire (İzmir), Sarayköy (Denizli), Salihli (Manisa), Nurdağı (Gaziantep), Ayvalık and Bandırma (Balıkesir), and in Erzincan and Eskişehir provinces, established under the Mehmet Zorlu Foundation memorial forest protocols.

(8.15.2.8) Indicate if you can provide the size of the area covered by the initiative

Select from:

☑ Yes

(8.15.2.9) Area covered by the initiative (ha)

669

(8.15.2.10) Type of engagement

Select all that apply

☑ Partner: Shares responsibility with other stakeholders to manage and implement actions.

☑ Implementer: Executes actions based on the collective goals

☑ Funder: Provides full or partial financial resources

(8.15.2.11) Engagement start year

2017

(8.15.2.12) Engagement end year

Select from:

☑ Please specify :2035

(8.15.2.13) Estimated investment over the project period

8846850

(8.15.2.14) Landscape goals supported by engagement

Environmental

☑ Biodiversity protected and/or restored

☑ Decreased ecosystem degradation rate

☑ Improved rate of carbon sequestration (e.g., through restoration)

☑ Natural ecosystems conserved and/or restored

Production

☑ Improved and/or maintained soil health

(8.15.2.15) Organization actions supporting initiative

Build community and multi-stakeholder capacities

☑ Communicate externally the business case for investing in landscapes/jurisdiction

☑ Engage stakeholders on importance of conservation, restoration and/or rehabilitation

☑ Promote and implement climate change adaptation and mitigation activities

(8.15.2.16) Type of partners engaged in the initiative design and implementation

Select all that apply

☑ National government

☑ Sub-national government

☑ Local communities

☑ NGO and/or civil society

(8.15.2.17) Description of engagement

The Zero Carbon Footprint Forests Project began as a means of offsetting the carbon footprint of fairs and summits and was expanded in 2017 through a cooperation protocol with the General Directorate of Forestry, the state forest authority under the Ministry of Agriculture and Forestry. Planting sites are designated by the Directorate within its regional and district forest management units, and are concentrated on fire-affected and degraded state forest land. A separate protocol is signed for each planting year, specifying the forest regional directorate, district, compartment numbers, area in hectares and species mix. Our role covers three of the engagement types. As funder we finance site preparation, saplings, planting and the maintenance period. As partner we agree the annual planting programme with the Directorate and share responsibility for delivery. As implementer we take part in planting events with employees and members of the surrounding communities. We are not the convener: site selection, species prescription and technical supervision remain with the Directorate, which is the appropriate allocation of roles given that the land is state forest. Goals were prioritised on the basis of our biodiversity and ecosystem risk assessment, which identifies our own negative land-use footprint from forest permits associated with generation and grid assets, currently 3,318.8 hectares. Restoration of degraded and fire-affected forest was selected because it is the intervention that directly offsets that footprint in the same country and in comparable ecosystems, rather than a generic offset. Carbon sequestration, soil health and biodiversity recovery follow from the same intervention. Governance sits with the Directorate through its regional and district forest management units, which hold decision rights over site designation, species and acceptance of the work. Community participation is organised through the district forest management chiefdoms and local authorities, and environmental organisations take part in planting and awareness activities. Our role in governance is that of a contributing partner rather than a decision maker.

(8.15.2.18) Collective monitoring framework used to measure progress towards landscape goals and actions

Select from:

☑ Yes, progress is collectively monitored using a shared external framework, please specify :General Directorate of Forestry afforestation survival and maintenance monitoring system

(8.15.2.19) State the achievements of your engagement so far and how progress is monitored

By the end of 2025 we had planted 692,000 saplings and established 669 hectares of afforested area under the protocols, against a target of 1.2 million saplings by 2035. The established sites are Tire, İzmir (140 ha, 2017), Sarayköy, Denizli (55 ha, 2018), Salihli, Manisa (219 ha, 2019), Nurdağı, Gaziantep (75 ha in 2020 and 95 ha in 2021), Erzincan (2022), Ayvalık, Balıkesir (35 ha, 2023) and Eskişehir (50 ha, 2024). Species are prescribed by the Directorate for each site and include Turkish red pine, stone pine, cypress, almond, oleaster, walnut, oak, hawthorn, olive and black locust. Progress is monitored through the Directorate's own afforestation monitoring system. Each site is inspected during the maintenance period that follows planting, survival is assessed and beating up is carried out where establishment has failed, and the outcome is reported back to us as the funding partner. Acceptance of the work rests with the district forest management unit rather than with us, which gives the monitoring independence from our own reporting. We track the outcome against our Net Positive Impact indicator, which is measured in hectares and defined as afforested area less the land area under forest permits associated with our operations. At the end of 2025 this stood at minus 2,649.8 hectares, being 669 hectares afforested against 3,318.8 hectares of permit area, and our target is to reach zero or better by 2035. Planting in 2025 was limited to 2,000 saplings at Bandırma, Balıkesir, because the annual planting budget was not released. The protocol with the Directorate remains active and the programme resumes at scale in 2026. Reaching the 2035 target requires approximately 51,000 saplings a year from 2026, which is within the range delivered between 2019 and 2024, when 90,000 saplings were planted annually.

(8.15.2.20) Claims made

Select from:

☑ Yes, we are making a claim

(8.15.2.21) Type of claim made

Select from:

☑ Individual claim

(8.15.2.22) Provide further details on your claim

We publish the cumulative number of saplings planted and the afforested area established under this initiative in our Integrated Annual Report and on our corporate website, and we report the resulting Net Positive Impact position in hectares. These are individual claims: they describe our own contribution, being the area we have funded and the saplings planted under our protocols, and are not presented as an attribution of landscape-level outcomes achieved collectively by all stakeholders in these districts. We do not claim carbon credits, offsets or any avoided deforestation outcome from this area, and the afforested hectares are not used to reduce our reported greenhouse gas emissions. The claim is confined to the restoration contribution itself and to its effect on our own land-use balance.
[Add row]

(8.15.3) For each of your disclosed commodities, provide details on the disclosure volume from each of the landscapes/jurisdictions you engage in.

Row 1

(8.15.3.1) Landscape/jurisdiction ID

Select from:

☑ LJ1

(8.15.3.2) Does any of your produced and/or sourced commodity volume originate from this landscape/jurisdiction, and are you able/willing to disclose information on this volume?

Select from:

☑ No, we do not produce/source from this landscape/jurisdiction

[Add row]

(8.16) Do you participate in any other external activities to support the implementation of policies and commitments related to deforestation, ecosystem conversion, or human rights issues in commodity value chains?

Select from:

☑ Yes

(8.16.1) Provide details of the external activities to support the implementation of your policies and commitments related to deforestation, ecosystem conversion, or human rights issues in commodity value chains

Row 1

(8.16.1.1) Commodity

Select all that apply

☑ Timber products

(8.16.1.2) Activities

Select all that apply

☑ Involved in industry platforms
☑ Engaging with communities
☑ Engaging with non-governmental organizations
☑ Funding research organizations

(8.16.1.3) Country/area

Select from:
☑ Türkiye

(8.16.1.4) Subnational area

Select from:
☑ Not applicable

(8.16.1.5) Provide further details of the activity

Industry platforms. We are a signatory to the United Nations Global Compact and report against its principles on human rights, labour, environment and anti-corruption. These principles are carried into our value chain through the Zorlu Holding Code of Conduct and supplier principles, which every supplier must commit to as a condition of admission to our approved supplier list, and through the environmental specifications attached to each procurement category. Our supplier ESG assessment is built on external frameworks rather than internal ones, being aligned with ISO 26000, the UN Global Compact and the GRI Standards. We also participate in environmental policy discussion through sector associations and through TÜSİAD, which is entered on the European Union Transparency Register, and we disclose annually through CDP and under the Turkish Sustainability Reporting Standards, both of which subject our commitments to external scrutiny. Engaging with communities. Local communities take part in the planting and maintenance of the afforestation sites established under our protocols with the General Directorate of Forestry, and community consultation is carried out as part of the environmental impact assessment for each new project. Our Deforestation Combat Policy commits us to respecting the customary rights of local communities and indigenous peoples to land, resources and living spaces, and to engaging with affected communities in line with the principle of Free, Prior and Informed Consent, which gives this engagement a defined basis rather than leaving it to discretion. Engaging with non-governmental organizations. Environmental organizations take part in the design and delivery of our reforestation and awareness activities alongside the forest authority and local communities. Funding research organizations. We fund and host conservation research with Pamukkale University on the yellow bumblebee plant, a rare species found around our Kızıldere III geothermal plant in Denizli. The work covers population survey and genetic research, and contributed to the species being assessed and listed on the IUCN Red List of Threatened Species, giving it internationally recognised protection status. Geographic scope. The industry platform activity is national and international in scope; the community, NGO and research activities are located in Türkiye, principally in Denizli, İzmir, Manisa, Gaziantep, Balıkesir and Eskişehir.
[Add row]

(8.17) Is your organization supporting or implementing project(s) focused on ecosystem restoration and long-term protection?

Select from:
☑ Yes

(8.17.1) Provide details on your project(s), including the extent, duration, and monitoring frequency. Please specify any measured outcome(s).

Row 1

(8.17.1.1) Project reference

Select from:
☑ Project 1

(8.17.1.2) Project type

Select from:
☑ Forest ecosystem restoration

(8.17.1.3) Expected benefits of project

Expected benefits of project
☑ Disaster risk reduction
☑ Improvement to soil health
☑ Reduce/halt biodiversity loss
☑ Increase in carbon sequestration
☑ Restoration of natural ecosystem(s)
☑ Net gain in biodiversity and ecosystem integrity

(8.17.1.4) Is this project originating any carbon credits?

Select from:

☑ No

(8.17.1.5) Description of project

The Zero Carbon Footprint Forests Project restores degraded and fire-affected state forest land in Türkiye. It is entirely voluntary: there is no regulatory requirement and no certification scheme attached to it, and it generates no carbon credits. The project began as a means of offsetting the footprint of our fairs and summits and was expanded in 2017 through a cooperation protocol with the General Directorate of Forestry, the state forest authority under the Ministry of Agriculture and Forestry. A separate protocol is signed for each planting year, specifying the forest regional directorate, the district, the compartment numbers, the area in hectares and the species mix. The Directorate designates the site, prescribes the species, supervises the work and accepts it; we fund the site preparation, saplings, planting and the maintenance period, and our employees and members of the surrounding communities take part in planting. Sites established to date are Tire in İzmir (140 ha, 2017), Sarayköy in Denizli (55 ha, 2018), Salihli in Manisa (219 ha, 2019), Nurdağı in Gaziantep (75 ha in 2020 and 95 ha in 2021), Erzincan (2022), Ayvalık in Balıkesir (35 ha, 2023) and Eskişehir (50 ha, 2024). Species are native and site-appropriate, including Turkish red pine, stone pine, cypress, almond, oleaster, walnut, oak, hawthorn, olive and black locust. The reason we act voluntarily is that our own operations carry a land-use footprint. Forest permits associated with our generation and grid assets cover 3,318.8 hectares, of which 2,751.3 hectares relate to the distribution network. Restoring degraded forest in the same country and in comparable ecosystems is the response that addresses that footprint directly, rather than an offset purchased elsewhere. None of the restored area is planted for commercial purposes and none of it will be harvested.

(8.17.1.6) Where is the project taking place in relation to your value chain?

Select all that apply

☑ Project based in area with direct operations

(8.17.1.7) Start year

2017

(8.17.1.8) Target year

Select from:

☑ 2031-2035

(8.17.1.9) Project area to date (Hectares)

669

(8.17.1.10) Project area in the target year (Hectares)

3319

(8.17.1.11) Country/Area

Select from:

☑ Türkiye

(8.17.1.12) Latitude

38.4833

(8.17.1.13) Longitude

28.14

(8.17.1.14) Monitoring frequency

Select from:

☑ Annually

(8.17.1.15) Total investment over the project period (currency)

8846850

(8.17.1.16) For which of your expected benefits are you monitoring progress?

Select all that apply

☑ Net gain in biodiversity and ecosystem integrity

☑ Restoration of natural ecosystem(s)

(8.17.1.17) Please explain

Monitoring. The Directorate inspects each site during the maintenance period that follows planting, assesses survival and carries out beating up where establishment has failed. Inspection is annual during the establishment years and the outcome is reported to us as the funding partner. Acceptance of the work rests with the district forest management unit rather than with us, which gives the monitoring independence from our own reporting. Indicators. We track two things. The first is cumulative area established and saplings planted, which reached 669 hectares and 692,000 saplings by the end of 2025, against 600,000 saplings in 2023 and 690,000 in 2024.

The second is our Net Positive Impact indicator, measured in hectares and defined as afforested area less the land area under forest permits associated with our operations. At the end of 2025 this stood at minus 2,649.8 hectares, being 669 hectares restored against 3,318.8 hectares of permit area. The baseline for the area indicator is 2017, the year the cooperation with the Directorate began, when the established area was zero. Target area. The target of 1.2 million saplings by 2035 corresponds to approximately 1,281 hectares, derived by applying the average planting density achieved across the established sites of approximately 830 saplings per hectare. Site densities vary considerably with terrain and species prescription, from 250 to 1,273 saplings per hectare, so the target area is an estimate rather than a commitment to a specific hectarage. Progress in 2025. Planting was limited to 2,000 saplings at Bandırma in Balıkesir because the annual planting budget was not released. The protocol with the Directorate remains active and the programme resumes at scale in 2026. Reaching the 2035 target requires approximately 51,000 saplings a year from 2026, which is below the 90,000 a year delivered between 2019 and 2024. We do not monitor soil health, carbon sequestration or disaster risk reduction directly, although we expect the project to deliver them; these are assessed by the Directorate as part of its own silvicultural management rather than measured by us.
[Add row]

C9. Environmental performance - Water security

(9.1) Are there any exclusions from your disclosure of water-related data?

Select from:

☑ Yes

(9.1.1) Provide details on these exclusions.

Row 1

(9.1.1.1) Exclusion

Select from:

☑ Facilities

(9.1.1.2) Description of exclusion

Dead Sea Solar Power Plant, a 1.5 MWp photovoltaic facility in Jericho, Palestine, operated by our subsidiary ZJ Strong Energy for Renewable Energy Limited Co., in which Zorlu Energy holds a 75% interest.

(9.1.1.3) Reason for exclusion

Select from:

☑ Water used for internal WASH services

(9.1.1.4) Primary reason why data is not collected and/or reported

Select from:

☑ Challenges associated with data collection and/or quality

(9.1.1.7) Country/area and river basin of exclusion

Palestine (State of)
☑ Other, please specify :Dead Sea basin

(9.1.1.8) Estimated volume of water the exclusion represents (megaliters)

0.5

(9.1.1.9) Estimated % of total water

0.1

(9.1.1.10) Please explain

The facility falls within our organizational boundary under the operational control approach. It is a 1.5 MWp photovoltaic installation with no thermal cycle, no cooling requirement and no process water use; its only water use is welfare and sanitation for a small number of site personnel, which is why it is excluded under "water used for internal WASH services". The ongoing armed conflict in the region has also prevented site access and made it impossible to collect verifiable water data for the reporting year, as reflected in the primary reason for non-collection. The same facility is excluded from our GHG inventory, as reported in question 7.4.1. We estimate the excluded volume at 0.5 megaliters per year on a conservative basis, benchmarked against welfare water use at comparable small installations. This represents 0.0000267% of our total water withdrawal of 1,875,275 megaliters; the percentage field is reported as 0.1 because the system does not accept a lower value. The facility is located in the Dead Sea basin, an area of extremely high baseline water stress and poor water quality. We recognise that a small absolute volume in a highly stressed basin carries greater significance than the same volume elsewhere. However, as a photovoltaic plant it has no process discharge and therefore no associated pollution load. The exclusion is not a significant portion of our total water use, and we will resume data collection as soon as conditions permit safe site access.
[Add row]

(9.2) Across all your operations, what proportion of the following water aspects are regularly measured and monitored?

Water withdrawals – total volumes

(9.2.1) % of sites/facilities/operations

Select from:
☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ At least once a month

(9.2.3) Method of measurement

Direct measurement. Groundwater abstraction at our geothermal plants and at the Lüleburgaz steam plant is metered with dedicated flow meters read daily; hydroelectric withdrawals are derived from turbine and spillway flow records; municipal supply is metered by the utility. Volumes are consolidated monthly at group level.

(9.2.4) Please explain

"Facilities" refers to the 15 operational reporting units within our organizational boundary: our geothermal, hydroelectric, wind and solar generation sites, the Lüleburgaz steam plant, our head office, and the operational sites of our electricity distribution (OEDAŞ) and retail (OEPSAŞ) businesses. All 15 units report withdrawal volumes monthly through a standardized template, so coverage is 100%. The 2025 data was subject to independent limited assurance under ISAE 3000. Non-consumptive pass-through volumes at our hydroelectric plants are recorded separately from consumptive withdrawals throughout our water accounting.

Water withdrawals – volumes by source

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ At least once a month

(9.2.3) Method of measurement

Direct measurement, with each metered volume assigned at the point of abstraction to one of six categories: municipal supply, fresh surface water, brackish surface water/seawater, renewable groundwater, non-renewable groundwater, and reclaimed water. Hydroelectric abstraction from reservoirs, streams and canals is recorded as a separate category.

(9.2.4) Please explain

Source disaggregation is captured in the same monthly template used for total volumes and is completed by all 15 reporting units, including a nil entry where a source is not used, so coverage is 100%. Groundwater is split between renewable and non-renewable aquifers on the basis of the abstraction permit and the hydrogeological classification of each well.

Water withdrawals quality

(9.2.1) % of sites/facilities/operations

Select from:

☑ Not relevant

(9.2.4) Please explain

Our withdrawals consist of geothermal reservoir fluid abstracted for energy conversion and returned to the same reservoir by reinjection, non-consumptive hydroelectric pass-through flows, and municipal supply already treated to national drinking water standards. In none of these cases is the raw water abstracted for a use whose suitability depends on its chemical quality, so quality testing of withdrawn water is not technically necessary and is not carried out. We keep this position under review and will begin monitoring if our abstraction profile changes.

Water discharges – total volumes

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ At least once a month

(9.2.3) Method of measurement

Direct measurement. Geothermal reinjection is metered on the injection lines and logged continuously through the plant control system; discharges to municipal and organized industrial zone sewers are metered; hydroelectric returns are derived from turbine and spillway flow records.

(9.2.4) Please explain

All 15 reporting units report discharge volumes monthly using the same template as withdrawals, so coverage is 100%. The 2025 data was subject to independent limited assurance under ISAE 3000. Hydroelectric pass-through returns are reported separately and are not characterized as effluent, since the water is not withdrawn into a process and leaves our boundary unaltered.

Water discharges – volumes by destination

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ At least once a month

(9.2.3) Method of measurement

Direct measurement, with each discharge stream assigned at the discharge point to one of five destinations: fresh surface water, brackish surface water/seawater, groundwater, geothermal reinjection to the source reservoir, and third-party destinations including municipal and organized industrial zone sewer networks.

(9.2.4) Please explain

Destination disaggregation is captured monthly by all 15 reporting units, including nil entries where a destination is not used, so coverage is 100%. Geothermal reinjection is reported as a discharge to groundwater directed to the same reservoir from which the fluid was abstracted.

Water discharges – volumes by treatment method

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ At least once a month

(9.2.3) Method of measurement

Each discharge stream is assigned monthly to a treatment category at the point of discharge: on-site package biological treatment prior to discharge, no treatment applied prior to reinjection into the source reservoir, no treatment required for non-consumptive hydroelectric pass-through flows, and transfer to a third-party municipal or organized industrial zone treatment plant.

(9.2.4) Please explain

The treatment category of every discharge stream is recorded for all 15 reporting units, so coverage is 100%. Two facilities operate on-site package wastewater treatment plants; geothermal brine is returned to the source reservoir without treatment as required by the reinjection permit; hydroelectric pass-through flows require no treatment; and the remaining domestic wastewater streams are transferred to third-party treatment operators.

Water discharge quality – by standard effluent parameters

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ At least once a year

(9.2.3) Method of measurement

Annual laboratory analysis of effluent samples by an accredited third-party laboratory in accordance with the Turkish Water Pollution Control Regulation. Parameters analyzed are chemical oxygen demand, biochemical oxygen demand and total suspended solids, together with the site-specific parameters set in the discharge permit.

(9.2.4) Please explain

Effluent quality monitoring is relevant where we operate our own treatment and are responsible for the effluent leaving our boundary. This applies to the Alaşehir geothermal plant and the İkizdere hydroelectric plant, both with on-site package treatment plants, and we monitor 100% of them. The 2025 loads were 0.137 t COD, 0.049 t BOD and 0.033 t TSS, against a 10% reduction target for 2030. Elsewhere the aspect is not relevant: wind, solar, office, distribution and retail sites discharge only domestic wastewater to municipal sewers; Lüleburgaz discharges to an organized industrial zone network where effluent standards are set and enforced by the network operator; our other hydroelectric plants return pass-through flows unaltered; and geothermal brine is reinjected into the source reservoir.

Water discharge quality – emissions to water (nitrates, phosphates, pesticides, and/or other priority substances)

(9.2.1) % of sites/facilities/operations

Select from:

☑ Not relevant

(9.2.4) Please explain

Our operations do not use nitrates, phosphates, pesticides or comparable priority substances in any process, and none of our discharge streams is a pathway for such substances to reach a water body. Geothermal fluid is returned by reinjection to the same reservoir from which it was abstracted, in a closed loop that does not release it to surface water or to a shallow aquifer. Hydroelectric returns are non-consumptive pass-through flows whose composition is unaltered. The remaining discharges are domestic wastewater. Monitoring emissions of priority substances to water is therefore not technically meaningful for our operations. We keep this assessment under review as part of our environmental management system.

Water discharge quality – temperature

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Continuously

(9.2.3) Method of measurement

Continuous measurement through the plant control system. Temperature is recorded on the reinjection lines alongside injection flow and pressure, and is used operationally to manage reservoir performance.

(9.2.4) Please explain

Thermal discharge is relevant only where discharged water leaves our process at an elevated temperature, which applies to the reinjected brine at our two geothermal power plants, Kızıldere and Alaşehir. Temperature is recorded continuously at 100% of these facilities. At all other sites the discharge is either non-consumptive hydroelectric pass-through flow at ambient river temperature or domestic wastewater at ambient temperature, so temperature monitoring would not be meaningful.

Water consumption – total volume

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ At least once a month

(9.2.3) Method of measurement

Calculated monthly for each reporting unit as metered water withdrawn minus metered water discharged, using the same primary meter readings that underpin the withdrawal and discharge rows.

(9.2.4) Please explain

Consumption is derived for all 15 reporting units each month, so coverage is 100%. Total consumption in 2025 was 86,836 megaliters. Non-consumptive hydroelectric pass-through volumes are excluded from consumption, since these flows are returned in full to the same watercourse. We report consumption in areas of high and extremely high water stress separately and have set an annual reduction target against it.

Water recycled/reused

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ At least once a month

(9.2.3) Method of measurement

Direct measurement. Recovered volumes are metered separately, principally steam condensate return at the Lüleburgaz steam plant and process condensate recovery at Kızıldere, and are read daily and reported monthly.

(9.2.4) Please explain

Water recycling and reuse is monitored across all 15 reporting units through a dedicated line in the monthly template, completed with a nil entry where no recovery takes place, so coverage is 100%. In 2025 we recovered and reused 156 megaliters, arising at our geothermal and steam generation operations. Recycling is not technically applicable at our hydroelectric, wind and solar sites, where there is no process water cycle; these sites are nonetheless included in the monitoring population and report nil.

The provision of fully-functioning, safely managed WASH services to all workers

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ At least once a year

(9.2.3) Method of measurement

Annual verification at each site through our occupational health and safety management system, certified to ISO 45001:2018, covering the availability of drinking water and of sanitation and hygiene facilities for all workers, including contractor personnel working on our sites.

(9.2.4) Please explain

The provision of safely managed WASH services is verified annually at 100% of our 15 reporting units, at our domestic and international operations alike, through the site inspection programme run under our ISO 45001 certified occupational health and safety management system. Drinking water is supplied from municipal networks meeting national drinking water standards or, at sites without a municipal connection, from permitted wells. Sanitation facilities are provided at every staffed location and are connected either to a municipal sewer network or to an on-site treatment or collection system. Our Environmental Policy recognizes safe access to water and sanitation as a fundamental human right and commits us to contributing to improved WASH conditions in the communities where we operate.
[Fixed row]

(9.2.1) For your hydropower operations, what proportion of the following water aspects are regularly measured and monitored?

Fulfilment of downstream environmental flows

(9.2.1.1) % of sites/facilities/operations measured and monitored

Select from:
☑ 100%

(9.2.1.2) Please explain

"Facilities" refers to our seven hydroelectric power plants in Türkiye: Ataköy, Beyköy, Çıldır, İkizdere, Kuzgun, Mercan and Tercan. Downstream environmental flow requirements are set individually for each plant by the State Hydraulic Works (DSİ) in its operating licence, under Turkish water structures legislation, and are expressed as a minimum flow to be released to the river reach downstream of the intake. Because release of the environmental flow is a licence condition at every plant, monitoring covers 100% of our hydropower operations. Flow is released through a dedicated environmental flow outlet, measured at the outlet and logged through the plant control system, and compliance is reported to DSİ. In 2025 we recorded no incident of non-compliance with an abstraction licence, discharge consent or other water regulation at any of our operations.

Sediment loading

(9.2.1.1) % of sites/facilities/operations measured and monitored

Select from:
☑ 100%

(9.2.1.2) Please explain

This row relates to the same seven hydroelectric power plants. Sediment accumulation is assessed at 100% of them as part of routine operation. Deposition in the intake structure and settling basin is inspected by plant operators, and the observed level of accumulation, together with turbidity following high-flow events, determines when a sediment flushing operation is carried out. Each flushing operation is logged with its date, duration and the reach affected, giving us a continuous record of sediment behaviour at every plant. The records are used both to protect the operating capacity of the intake and to manage downstream effects: flushing is scheduled to avoid periods that are sensitive for aquatic life and is carried out under the conditions set in each plant's environmental impact assessment and DSİ operating licence. Results are reviewed within our ISO 14001 certified environmental management system.

Other, please specify

(9.2.1.1) % of sites/facilities/operations measured and monitored

Select from:

☑ Not relevant

(9.2.1.2) Please explain

We have not identified an additional water aspect specific to our hydropower operations beyond environmental flows and sediment loading that is material to our understanding of water-related impacts. Reservoir and river flow volumes, which are relevant to our operations, are already reported under question 9.2.
[Fixed row]

(9.2.2) What are the total volumes of water withdrawn, discharged, and consumed across all your operations, how do they compare to the previous reporting year, and how are they forecasted to change?

Total withdrawals

(9.2.2.1) Volume (megaliters)

1875275

(9.2.2.2) Comparison with previous reporting year

Select from:

☑ Lower

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.2.4) Five-year forecast

Select from:

☑ About the same

(9.2.2.5) Primary reason for forecast

Select from:

☑ No/minimal change in business activity

(9.2.2.6) Please explain

Total withdrawals were 1,875,275 megaliters, compiled from monthly site-level reporting by all 15 reporting units and subject to independent limited assurance under ISAE 3000. Non-consumptive hydroelectric pass-through water accounts for 1,782,329 megaliters (95% of the total); renewable groundwater abstracted for geothermal generation accounts for 92,278 megaliters, non-renewable groundwater for 486 megaliters, reclaimed water for 156 megaliters and municipal supply for 25 megaliters. For our hydroelectric plants, withdrawals comprise river inflow diverted into the intake structures, measured through turbine and spillway flow records. Precipitation onto reservoir surfaces, surface runoff and third-party discharges into reservoirs are not included, as our plants are predominantly run-of-river or small-reservoir schemes where these elements are immaterial to the water balance. The same boundary is applied consistently throughout this questionnaire. We define a change of up to 5% as "about the same", 5-25% as "higher" or "lower", and above 25% as "much higher" or "much lower". Withdrawals fell 11.7% against 2024, driven by lower hydroelectric throughput: volumes diverted through our plants fell 12.3% year on year as a result of reduced river inflow. We forecast withdrawals to remain about the same over five years, as our planned capacity additions are in wind and solar and no new hydroelectric capacity is planned.

Total discharges

(9.2.2.1) Volume (megaliters)

1788439

(9.2.2.2) Comparison with previous reporting year

Select from:

☑ Lower

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.2.4) Five-year forecast

Select from:

☑ About the same

(9.2.2.5) Primary reason for forecast

Select from:

☑ No/minimal change in business activity

(9.2.2.6) Please explain

Total discharges were 1,788,439 megaliters. Discharges to surface water account for 1,709,739 megaliters, geothermal reinjection to the source reservoir for 78,476 megaliters, and transfers to third-party sewer and treatment operators for 225 megaliters. For our hydroelectric plants, discharges comprise flows returned to the river through the turbine outlet and the spillway. Underground seepage and third-party withdrawals from reservoirs are not included, as neither is metered and both are immaterial to our water balance. At six of our seven hydroelectric plants the returned volume is derived by applying a 95% return factor to metered inflow; at İkizdere the returned volume is metered directly and equals inflow. Using the same thresholds as for withdrawals, discharges fell 11.2% against 2024, tracking the reduction in hydroelectric throughput over the same period. We forecast discharges to remain about the same over five years, consistent with our withdrawal forecast, since the great majority of our discharge volume is hydroelectric water returned to the same watercourse and no new hydroelectric capacity is planned.

Total consumption

(9.2.2.1) Volume (megaliters)

86836

(9.2.2.2) Comparison with previous reporting year

Select from:

☑ Lower

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.2.4) Five-year forecast

Select from:

☑ About the same

(9.2.2.5) Primary reason for forecast

Select from:

☑ No/minimal change in business activity

(9.2.2.6) Please explain

Total consumption was 86,836 megaliters, calculated company-wide as total withdrawals minus total discharges in line with CDP's definition: 1,875,275 - 1,788,439 = 86,836 megaliters. By source, hydroelectric operations account for 72,597 megaliters (83.6%), geothermal operations for 13,889 megaliters (16.0%), the Lüleburgaz steam plant for 346 megaliters and all other sites for approximately 3 megaliters. Geothermal consumption is the balance between abstracted reservoir fluid and reinjected brine, arising principally as evaporation from cooling towers and as steam lost through the non-condensable gas system. Consumption at Lüleburgaz arises as cooling tower evaporation and as water incorporated into steam sold to customers. An uncertainty applies to the hydroelectric figure. At six of our seven hydroelectric plants the returned volume is derived using a 95% return factor rather than direct metering, so the 72,597 megaliters attributed to hydropower is a modelled estimate of losses to evaporation and seepage rather than a measured value. At İkizdere, where return flow is metered, measured consumption is zero. We are extending direct metering of return flows to the remaining plants and expect this to reduce reported consumption materially once complete. Consumption fell 21.5% against 2024, principally reflecting lower hydroelectric throughput. We forecast consumption to remain about the same over five years. Our planned capacity additions are in wind and solar, which have negligible water consumption, and we have set an annual reduction target for water consumption and a separate target for consumption in areas of high and extremely high water stress, which was 50,601,240 tonnes in 2025.
[Fixed row]

(9.2.4) Indicate whether water is withdrawn from areas with water stress, provide the volume, how it compares with the previous reporting year, and how it is forecasted to change.

(9.2.4.1) Withdrawals are from areas with water stress

Select from:

☑ Yes

(9.2.4.2) Volume withdrawn from areas with water stress (megaliters)

820201

(9.2.4.3) Comparison with previous reporting year

Select from:

☑ Lower

(9.2.4.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.4.5) Five-year forecast

Select from:

☑ About the same

(9.2.4.6) Primary reason for forecast

Select from:

☑ No/minimal change in business activity

(9.2.4.7) % of total withdrawals that are withdrawn from areas with water stress

43.74

(9.2.4.8) Identification tool

Identification tool used

☑ WRI Aqueduct

☑ WWF Water Risk Filter

(9.2.4.9) Please explain

Withdrawals from areas with water stress were 820,201 megaliters in 2025, representing 43.7% of our total withdrawals of 1,875,275 megaliters. The assessment covers all 15 reporting units within our boundary, with no exclusions, and is based on the catchment in which each withdrawal source is located rather than on the administrative location of the facility. We assess water stress annually using the WRI Aqueduct Water Risk Atlas and the WWF Water Risk Filter, and complement the output of these global tools with our own site-level assessment of the basins in which we operate. A withdrawal source is classified as being in an area with water stress where the global tools indicate elevated baseline water stress or reduced water availability, or where our own assessment identifies constraints at sub-basin level that the global datasets do not capture, such as competing abstraction, seasonal variability in river flow or local drought exposure. The same tools and datasets underpin our biodiversity and ecosystem risk assessment, which examined our sites under RCP 2.6, 7.0 and 8.5 for the 2030, 2050 and 2080 horizons. The volume reported is dominated by geothermal reservoir fluid abstracted at Kızıldere and Alaşehir, both located in extremely high stress catchments in the Büyük Menderes and Gediz basins, and by river inflow diverted at hydroelectric plants in basins we have identified as stressed. We define a change of up to 5% as "about the same", 5-25% as "higher" or "lower", and above 25% as "much higher" or "much lower", applied consistently with question 9.2.2. Withdrawals from stressed areas were lower than in 2024, in line with reduced hydroelectric throughput across our portfolio. We forecast them to remain about the same over the next five years: our planned capacity additions to 2030 are in wind and solar, which have negligible water requirements, and we have no plans for new hydroelectric or geothermal capacity in stressed catchments. We track and manage this exposure through an annual reduction target for water consumption in areas of high and extremely high water stress, against which 2025 consumption was 50,601 megaliters, down from 54,850 megaliters in 2024.
[Fixed row]

(9.2.7) Provide total water withdrawal data by source.

Fresh surface water, including rainwater, water from wetlands, rivers, and lakes

(9.2.7.1) Relevance

Select from:

☑ Relevant

(9.2.7.2) Volume (megaliters)

1782329.24

(9.2.7.3) Comparison with previous reporting year

Select from:

☑ Lower

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.7.5) Please explain

This row comprises river inflow diverted into the intake structures of our seven hydroelectric plants (1,782,329 megaliters) and fresh surface water abstracted at our wind operations in Pakistan (0.57 megaliters). Hydroelectric volumes are derived from turbine and spillway flow records; the Pakistan volume is metered. For our hydroelectric operations we include river inflow only. Precipitation onto reservoir surfaces, surface runoff and third-party discharges into reservoirs are excluded, as our plants are predominantly run-of-river or small-reservoir schemes where these elements would not change the water balance by more than 5%. Hydroelectric water is non-consumptive: it is returned to the same watercourse and is reported separately from consumptive withdrawals. We define a change of up to 5% as about the same, 5-25% as higher or lower, and above 25% as much higher or much lower, applied consistently across our water disclosure.

Brackish surface water/Seawater

(9.2.7.1) Relevance

Select from:

☑ Relevant

(9.2.7.2) Volume (megaliters)

0.45

(9.2.7.3) Comparison with previous reporting year

Select from:

☑ About the same

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☑ No/minimal change in business activity

(9.2.7.5) Please explain

This source is used only at our wind operations in Pakistan, where 0.45 megaliters of brackish surface water was withdrawn in 2025 for non-potable site use. The volume is metered. It was unchanged against 2024 and we expect no material change, as the site's requirement is fixed and modest. We have no cooling operations that rely on brackish surface water or seawater.

Groundwater – renewable

(9.2.7.1) Relevance

Select from:

☑ Relevant

(9.2.7.2) Volume (megaliters)

92278.1

(9.2.7.3) Comparison with previous reporting year

Select from:

☑ About the same

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☑ No/minimal change in business activity

(9.2.7.5) Please explain

This row is geothermal reservoir fluid abstracted at Kızıldere (72,684,013 tonnes) and Alaşehir (19,590,081 tonnes) for energy conversion. Volumes are metered on the production wells and logged continuously through the plant control systems. The great majority of this water is returned to the same reservoir through dedicated reinjection wells, so the abstraction operates as a closed loop rather than as a net draw on the aquifer. Volumes fell 0.2% against 2024, which is "about the same" under our thresholds, reflecting stable geothermal generation. Geothermal capacity additions are planned to 2030, so we expect this volume to rise gradually, offset by continued reinjection.

Groundwater – non-renewable

(9.2.7.1) Relevance

Select from:

☑ Relevant

(9.2.7.2) Volume (megaliters)

486.25

(9.2.7.3) Comparison with previous reporting year

Select from:

☑ Higher

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.7.5) Please explain

This row is groundwater abstracted from permitted wells at the Lüleburgaz steam plant (485,527 tonnes) and at the Gökçedağ wind plant (720 tonnes). Volumes are metered with dedicated flow meters read daily at Lüleburgaz and monthly at Gökçedağ. At Lüleburgaz the water feeds the demineralised water plant and cooling circuit supporting steam production for industrial customers, and a smaller volume serves the administrative building. Volumes were 7.0% higher than in 2024, which is "higher" under our thresholds, driven by demand for steam from our customers. We recognise that this is our most sensitive withdrawal source and that reducing it is a priority. The plant already operates three reverse osmosis units and returns steam condensate to the cycle, recovering 64,234 tonnes in 2025, and we are assessing further recovery and efficiency measures to reverse the trend.

Produced/Entrained water

(9.2.7.1) Relevance

Select from:

☑ Not relevant

(9.2.7.5) Please explain

Our operations do not generate produced or entrained water as defined by CDP: no water enters our boundary as a result of the extraction or processing of a raw material. Reclaimed water recovered within our processes, principally steam condensate return at Lüleburgaz and process condensate at Kızıldere totalling 156 megaliters in 2025, is reported as recycled and reused water rather than as a withdrawal source, to avoid double counting water already captured in the rows above. This accounts for the 0.008% difference between the sum of this table and the total withdrawals reported in question 9.2.2.

Third party sources

(9.2.7.1) Relevance

Select from:

☑ Relevant

(9.2.7.2) Volume (megaliters)

25.28

(9.2.7.3) Comparison with previous reporting year

Select from:

☑ Higher

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.7.5) Please explain

This row is municipal supply drawn under standard utility connections at our distribution operations (OEDAŞ, 15,540 tonnes), our head office (842 tonnes), our retail business (OEPSAŞ, 1,990 tonnes), the Alaşehir geothermal plant (5,674 tonnes) and three hydroelectric plants (1,238 tonnes). All third parties are municipal water suppliers; we do not withdraw from private or industrial third-party suppliers. Volumes are taken from utility meter readings and invoices. Volumes were 6.7% higher than in 2024, which is "higher" under our thresholds, reflecting increased occupancy and site activity at our distribution operations. The absolute volume is immaterial at 0.001% of our total withdrawals, and we expect it to remain broadly stable.
[Fixed row]

(9.2.8) Provide total water discharge data by destination.

Fresh surface water

(9.2.8.1) Relevance

Select from:
☑ Relevant

(9.2.8.2) Volume (megaliters)

1709738.65

(9.2.8.3) Comparison with previous reporting year

Select from:
☑ Lower

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:
☑ Increase/decrease in business activity

(9.2.8.5) Please explain

This row is water returned to the same watercourse from which it was diverted at our seven hydroelectric plants, comprising flows through the turbine outlet and the spillway. It is non-consumptive: the water is not withdrawn into a process, its quality is unaltered, and it is not effluent. Underground seepage and third-party withdrawals from our reservoirs are excluded. Neither is metered and both are immaterial to our water balance, so their omission does not change the total discharge figure reported in 9.2.2 by more than 5%. At six of our seven hydroelectric plants the returned volume is derived by applying a 95% return factor to metered inflow; at Ikizdere it is metered directly and equals inflow. A small volume of treated domestic effluent from the Alasehir geothermal plant is also included. We define a change of up to 5% as about the same, 5-25% as higher or lower, and above 25% as much higher or much lower, applied consistently across our water disclosure.

Brackish surface water/seawater

(9.2.8.1) Relevance

Select from:

☑ Not relevant

(9.2.8.5) Please explain

None of our operations discharges to brackish surface water or to the sea. We have no coastal facilities and no once-through cooling systems that would return water to a saline destination. Our discharges are limited to freshwater bodies, to the geothermal reservoir through reinjection, and to municipal sewer networks. We do not plan to use this destination.

Groundwater

(9.2.8.1) Relevance

Select from:

☑ Relevant

(9.2.8.2) Volume (megaliters)

78478.4

(9.2.8.3) Comparison with previous reporting year

Select from:

☑ Lower

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.8.5) Please explain

This row is dominated by geothermal brine returned to the source reservoir through dedicated reinjection wells at Kızıldere (60,901,572 tonnes) and Alaşehir (17,574,613 tonnes), metered on the injection lines and logged continuously through the plant control systems. Reinjection maintains reservoir pressure and returns the abstracted fluid to the formation it came from, so the geothermal cycle operates as a closed loop rather than as a net draw on the aquifer. The row also includes 2,220 tonnes of treated domestic effluent discharged to ground at our wind operations in Pakistan. Using the thresholds set out above, volumes fell 6.5% against 2024, tracking geothermal generation over the same period, since reinjected volume is a direct function of the fluid abstracted. We expect this volume to rise gradually as geothermal capacity is added to 2030, and we intend to maintain the same reinjection ratio.

Third-party destinations

(9.2.8.1) Relevance

Select from:

☑ Relevant

(9.2.8.2) Volume (megaliters)

222.28

(9.2.8.3) Comparison with previous reporting year

Select from:

☑ Higher

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.8.5) Please explain

This row is domestic and process wastewater conveyed to municipal sewer networks and to the treatment plant of the organized industrial zone at Luleburgaz, which accounts for 203,531 tonnes of the total. The remainder is domestic wastewater from our distribution operations (14,763 tonnes), the Ikizdere hydroelectric plant (1,106 tonnes), our retail business (1,990 tonnes), our head office (842 tonnes) and the Gokcedag wind plant (50 tonnes). All volumes are metered or derived from metered supply. All third parties are municipal or organized industrial zone wastewater operators; this row does not include water supplied to other organizations for their own use. Volumes were 17.3% higher than in 2024, driven by higher steam output at Luleburgaz and the associated increase in reverse osmosis reject water. The absolute volume is 0.01% of our total discharges. We are assessing recovery measures at Luleburgaz that would reduce both the abstraction and the discharge volume.
[Fixed row]

(9.2.9) Indicate the highest level to which your wastewater is treated (either by your organization or a third party) before being discharged to the environment.

Quaternary treatment

(9.2.9.1) Volume (megaliters)

0

(9.2.9.6) Please explain

We discharge no wastewater treated to quaternary level. Quaternary treatment targets micropollutants and is not applicable to our discharge streams, which consist of non-consumptive hydroelectric pass-through water, geothermal brine reinjected into its source reservoir, and domestic wastewater. None of these carries a micropollutant load that would warrant this level of treatment. We report zero rather than leaving this row blank, as we have complete visibility of the treatment level applied to every discharge stream.

Tertiary treatment

(9.2.9.1) Volume (megaliters)

0

(9.2.9.6) Please explain

We discharge no wastewater treated to tertiary level. The domestic wastewater we generate is treated to secondary level either in our own package plants or by the municipal and organized industrial zone operators receiving it, which meets the discharge standards set for the relevant receiving environments under the Turkish Water Pollution Control Regulation. No process stream in our operations requires removal of dissolved constituents beyond secondary treatment.

Secondary treatment

(9.2.9.1) Volume (megaliters)

227.96

(9.2.9.2) Comparison of treated volume with previous reporting year

Select from:

☑ Higher

(9.2.9.3) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.9.4) % of discharge volume treated in compliance with local regulatory standards

Select from:

☑ 100

(9.2.9.5) Factors considered in determining appropriate treatment level beyond local regulatory standards

Select all that apply

☑ Internally developed water quality standards or guidelines

☑ Profile of the receiving waterbody

(9.2.9.6) Please explain

This row is domestic and process wastewater treated to secondary biological level before reaching the environment: 203.53 megaliters of reverse osmosis reject and domestic wastewater from the Lüleburgaz steam plant, treated by the organized industrial zone operator; 5.67 megaliters at the Alaşehir geothermal plant and 1.11

megaliters at the İkizdere hydroelectric plant, both treated in our own package biological treatment plants; and 18.44 megaliters of domestic wastewater from our distribution, retail, head office and Gökçedağ operations, treated by municipal operators. All of this volume is treated to or beyond the minimum standard set by the Turkish Water Pollution Control Regulation and the relevant discharge permits and connection agreements, so we report 100% compliance. Where we operate our own treatment, we apply internally developed water quality criteria and take account of the character and sensitivity of the receiving watercourse in setting the treatment level, since our package plants at Alaşehir and İkizdere discharge to river reaches used downstream for irrigation and supporting aquatic habitat. We define a change of up to 5% as "about the same", 5-25% as "higher" or "lower", and above 25% as "much higher" or "much lower", applied consistently across our water disclosure. The volume was 17.3% higher than in 2024, driven by increased steam output at Lüleburgaz and the associated rise in reverse osmosis reject. We are assessing recovery measures at Lüleburgaz that would reduce both the abstraction and this discharge.

Primary treatment only

(9.2.9.1) Volume (megaliters)

3.62

(9.2.9.2) Comparison of treated volume with previous reporting year

Select from:

☑ About the same

(9.2.9.3) Primary reason for comparison with previous reporting year

Select from:

☑ No/minimal change in business activity

(9.2.9.4) % of discharge volume treated in compliance with local regulatory standards

Select from:

☑ 100

(9.2.9.5) Factors considered in determining appropriate treatment level beyond local regulatory standards

Select all that apply

☑ Internally developed water quality standards or guidelines

☑ Profile of the receiving waterbody

(9.2.9.6) Please explain

This row is 3.62 megaliters of domestic wastewater at our wind operations in Pakistan, which passes through settlement before discharge to ground via a soakaway. The volume is treated in accordance with the applicable local requirements, so we report 100% compliance. The site is remote and has a small permanent workforce, so no biological treatment stage is installed; in setting the arrangement we took account of the character of the receiving ground conditions and applied our internal water quality criteria alongside the local standard. The volume was unchanged against 2024 and we expect no material change.

No treatment

(9.2.9.1) Volume (megaliters)

1788207.76

(9.2.9.2) Comparison of treated volume with previous reporting year

Select from:

☑ Lower

(9.2.9.3) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.9.4) % of discharge volume treated in compliance with local regulatory standards

Select from:

☑ 100

(9.2.9.6) Please explain

This row comprises two streams that are not wastewater and to which treatment is neither required nor technically meaningful. The first is 1,709,738 megaliters of non-consumptive hydroelectric pass-through water. This is river water diverted through the intake, passed across the turbine and returned to the same watercourse through the turbine outlet and the spillway. It is not withdrawn into a process, it comes into contact with no reagent or effluent stream, and its quality on return is unaltered. Treating it would serve no environmental purpose and is not required by our operating licences. The second is 78,476 megaliters of geothermal brine returned to the source reservoir through dedicated reinjection wells at Kızıldere and Alaşehir. The reinjection permits require the fluid to be returned to the formation from which it was abstracted without treatment, so that reservoir chemistry and pressure are maintained. The brine is not released to a surface water body or to a

shallow aquifer. Both streams are managed in full accordance with the conditions of our abstraction licences, reinjection permits and environmental impact assessments, so we report 100% compliance with the applicable local regulatory standards. We recorded no incident of non-compliance with a water permit, standard or regulation in 2025. Using the thresholds set out above, the volume fell 11.2% against 2024, tracking lower river inflow and reduced hydroelectric throughput rather than any change in how these streams are managed. We expect the volume to remain broadly stable, as no new hydroelectric capacity is planned.

Unknown

(9.2.9.1) Volume (megaliters)

0

(9.2.9.6) Please explain

We report zero in this row. We have full visibility of the treatment level applied to every discharge stream across our 15 reporting units, including the streams transferred to municipal and organized industrial zone operators, where the treatment level is established through the connection agreement with each operator. No part of our discharge volume is of unknown treatment status.
[Fixed row]

(9.3) In your direct operations and upstream value chain, what is the number of facilities where you have identified substantive water-related dependencies, impacts, risks, and opportunities?

Direct operations

(9.3.1) Identification of facilities in the value chain stage

Select from:
☑ Yes, we have assessed this value chain stage and identified facilities with substantive water-related dependencies, impacts, risks, and opportunities

(9.3.2) Total number of facilities identified

15

(9.3.3) % of facilities in direct operations that this represents

Select from:

☑ 100%

(9.3.4) Please explain

For this question a facility is an operating site under our operational control, consistent with the 15 reporting units used throughout our water accounting. We have not aggregated facilities: our sites lie in separate river basins, so aggregating them would obscure the basin-specific nature of the dependency and risk exposure. All 15 units were assessed and all were identified as having substantive water-related dependencies, impacts, risks or opportunities. Our generation assets depend directly on water availability: seven hydroelectric plants on river inflow, two geothermal plants on reservoir fluid, and the Lüleburgaz steam plant on non-renewable groundwater. Our wind, distribution, retail and head office sites have far smaller volumes but sit in catchments we classify as water stressed, where even modest abstraction carries reputational and regulatory exposure. Applying the threshold defined in question 2.4, a disruption to water availability across these sites would affect revenue by more than the 1-10% band we treat as substantive. These figures are inherent, assessed before our response strategies. Residual exposure is materially lower: geothermal abstraction is a closed loop, with 78,476 megaliters reinjected in 2025, and hydroelectric withdrawals are non-consumptive, with 1,709,739 megaliters returned to the same watercourse. Basin-level detail is provided in question 3.2.

Upstream value chain

(9.3.1) Identification of facilities in the value chain stage

Select from:

☑ No, we have not assessed this value chain stage for facilities with substantive water-related dependencies, impacts, risks, and opportunities, but we are planning to do so in the next 2 years

(9.3.4) Please explain

Our upstream value chain consists principally of equipment manufacturers, construction contractors and fuel suppliers. We have not yet completed a facility-level water assessment of these suppliers, as supplier-level water data is not currently collected through our procurement processes. We have begun extending our environmental data requirements to suppliers and intend to complete an upstream water assessment within the next two years, drawing on the same WRI Aqueduct and WWF Water Risk Filter methodology we apply to our own sites.
[Fixed row]

(9.3.1) For each facility referenced in 9.3, provide coordinates, water accounting data, and a comparison with the previous reporting year.

Row 1

(9.3.1.1) Facility reference number

Select from:

☑ Facility 1

(9.3.1.2) Facility name (optional)

Istanbul Headquarters

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Türkiye

☑ Other, please specify :Marmara Basin

(9.3.1.8) Latitude

40.993661

(9.3.1.9) Longitude

28.699289

(9.3.1.10) Located in area with water stress

Select from:

☑ Yes

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Not applicable

(9.3.1.13) Total water withdrawals at this facility (megaliters)

0.84

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ Much lower

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0.84

(9.3.1.21) Total water discharges at this facility (megaliters)

0.84

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ Much lower

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0.84

(9.3.1.27) Total water consumption at this facility (megaliters)

0

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ About the same

(9.3.1.29) Please explain

Water use at this site is limited to welfare and sanitation for personnel. Volumes are taken from utility meter readings and invoices, and wastewater is conveyed to the municipal sewer network. Consumption is the balance between metered supply and metered discharge. The site does not depend on water for its output, but it is located in a catchment we classify as water stressed, where abstraction of any scale carries regulatory and community exposure. It is included in our facility-level disclosure so that our water accounting covers our full reporting boundary rather than only our high-volume assets. We define a change of up to 5% as "about the same", 5-25% as "higher" or "lower", and above 25% as "much higher" or "much lower", applied consistently across our water disclosure.

Row 2

(9.3.1.1) Facility reference number

Select from:

☑ Facility 2

(9.3.1.2) Facility name (optional)

Luleburgaz Steam Plant

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies
☑ Impacts
☑ Risks

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:
☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Türkiye
☑ Maritsa

(9.3.1.8) Latitude

41.4

(9.3.1.9) Longitude

27.35

(9.3.1.10) Located in area with water stress

Select from:
☑ Yes

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:
☑ Not applicable

(9.3.1.13) Total water withdrawals at this facility (megaliters)

485.53

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ Higher

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

485.53

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.21) Total water discharges at this facility (megaliters)

203.53

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ Higher

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

203.53

(9.3.1.27) Total water consumption at this facility (megaliters)

282

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ About the same

(9.3.1.29) Please explain

This facility supplies process steam to industrial customers and does not generate electricity, so no primary power generation source applies. Withdrawals are non-renewable groundwater from permitted wells, metered with dedicated flow meters read daily. Discharges are reverse osmosis reject and domestic wastewater conveyed to the treatment plant of the organized industrial zone. Consumption arises as cooling tower evaporation and as water incorporated into steam sold to customers. Steam condensate recovered within the process, 64 megaliters in 2025, is reported as recycled water rather than as a withdrawal source, consistent with question 9.2.7. The facility depends on non-renewable groundwater, which we recognise as our most sensitive withdrawal source, and is located in a catchment we classify as water stressed. Its 2024 water footprint inventory was verified to ISO 14046:2014 at reasonable assurance level. Discharge volumes rose with higher

steam output; we are assessing further condensate recovery and reverse osmosis efficiency measures to reduce abstraction. We define a change of up to 5% as "about the same", 5-25% as "higher" or "lower", and above 25% as "much higher" or "much lower".

Row 3

(9.3.1.1) Facility reference number

Select from:

☑ Facility 3

(9.3.1.2) Facility name (optional)

Gokcedag Wind Power Plant

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Türkiye

☑ Other, please specify :Ceyhan Basin

(9.3.1.8) Latitude

37.074627

(9.3.1.9) Longitude

36.246399

(9.3.1.10) Located in area with water stress

Select from:

☑ Yes

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Wind

(9.3.1.13) Total water withdrawals at this facility (megaliters)

0.72

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ About the same

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

0.72

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.21) Total water discharges at this facility (megaliters)

0.05

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ Much higher

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0.05

(9.3.1.27) Total water consumption at this facility (megaliters)

0.67

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Lower

(9.3.1.29) Please explain

Water use at this wind farm is limited to welfare and sanitation for personnel, supplied from a permitted well. Volumes are metered and wastewater is removed for treatment by a third-party operator. No discharge was recorded at this site in 2024; the 2025 figure reflects the first year in which wastewater removal was metered and reported, which is why the comparison is shown as much higher despite the very small absolute volume. The site does not depend on water for generation, but it draws on non-renewable groundwater in a catchment we classify as water stressed, which is the substantive consideration identified. It is included in our facility-level disclosure so that our water accounting covers our full reporting boundary. We define a change of up to 5% as "about the same", 5-25% as "higher" or "lower", and above 25% as "much higher" or "much lower".

Row 4

(9.3.1.1) Facility reference number

Select from:

☑ Facility 4

(9.3.1.2) Facility name (optional)

Pakistan Wind Power Plant

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Pakistan

☑ Indus

(9.3.1.8) Latitude

25.043613

(9.3.1.9) Longitude

67.999049

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Wind

(9.3.1.13) Total water withdrawals at this facility (megaliters)

5.03

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ Lower

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0.57

(9.3.1.16) Withdrawals from brackish surface water/seawater

0.45

(9.3.1.17) Withdrawals from groundwater - renewable

4.01

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.21) Total water discharges at this facility (megaliters)

3.62

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ Lower

(9.3.1.23) Discharges to fresh surface water

1.4

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

2.22

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

1.41

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Much lower

(9.3.1.29) Please explain

This wind farm draws well water treated by reverse osmosis for site use, together with small volumes of fresh and brackish surface water. Discharges comprise treated effluent released to surface water and reverse osmosis reject discharged to ground via a soakaway. All volumes are metered on site. The site does not depend on water for generation, and the catchment is classified as low to medium baseline water stress under the WRI Aqueduct Water Risk Atlas. It is included here so that our disclosure covers our international operations on the same basis as our domestic sites, and because reliance on treated well water in a remote location represents a supply dependency we monitor. We define a change of up to 5% as "about the same", 5-25% as "higher" or "lower", and above 25% as "much higher" or "much lower", applied consistently across our water disclosure.

Row 5

(9.3.1.1) Facility reference number

Select from:

☑ Facility 5

(9.3.1.2) Facility name (optional)

Alasehir Geothermal Power Plant

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Türkiye

☑ Other, please specify :Gediz Basin

(9.3.1.8) Latitude

38.233

(9.3.1.9) Longitude

28.261

(9.3.1.10) Located in area with water stress

Select from:

☑ Yes

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Geothermal

(9.3.1.13) Total water withdrawals at this facility (megaliters)

19595.76

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ Lower

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

19590.08

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

5.67

(9.3.1.21) Total water discharges at this facility (megaliters)

17580.29

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:
☑ About the same

(9.3.1.23) Discharges to fresh surface water

5.67

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

17574.61

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

2015.47

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Much lower

(9.3.1.29) Please explain

Volumes are metered on the production and reinjection lines and logged continuously through the plant control system. Withdrawals comprise geothermal reservoir fluid abstracted for energy conversion. Discharges are brine returned to the same reservoir through dedicated reinjection wells, reported as discharge to groundwater. Consumption is the balance between the two, arising principally as evaporation from cooling towers and as steam lost through the non-condensable gas system. Reclaimed process condensate is reported as recycled water rather than as a withdrawal source, consistent with question 9.2.7. The facility depends entirely on the availability and pressure of reservoir fluid, and is located in a catchment classified as extremely high baseline water stress. Reinjection maintains reservoir pressure, so the cycle operates as a closed loop rather than a net draw on the aquifer, which materially reduces our residual exposure relative to the inherent dependency. We define a change of up to 5% as "about the same", 5-25% as "higher" or "lower", and above 25% as "much higher" or "much lower", applied consistently across our water disclosure.

Row 6

(9.3.1.1) Facility reference number

Select from:

☑ Facility 6

(9.3.1.2) Facility name (optional)

Kizildere I-II-III Geothermal Power Plant

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Türkiye

☑ Other, please specify :Buyuk Menderes Basin

(9.3.1.8) Latitude

37.956213

(9.3.1.9) Longitude

28.842528

(9.3.1.10) Located in area with water stress

Select from:

☑ Yes

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Geothermal

(9.3.1.13) Total water withdrawals at this facility (megaliters)

72684.01

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ About the same

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

72684.01

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.21) Total water discharges at this facility (megaliters)

60901.57

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ Lower

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

60901.57

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

11782.44

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Much higher

(9.3.1.29) Please explain

Volumes are metered on the production and reinjection lines and logged continuously through the plant control system. Withdrawals comprise geothermal reservoir fluid abstracted for energy conversion. Discharges are brine returned to the same reservoir through dedicated reinjection wells, reported as discharge to groundwater. Consumption is the balance between the two, arising principally as evaporation from cooling towers and as steam lost through the non-condensable gas system. Reclaimed process condensate is reported as recycled water rather than as a withdrawal source, consistent with question 9.2.7. The facility depends entirely on the availability and pressure of reservoir fluid, and is located in a catchment classified as extremely high baseline water stress. Reinjection maintains reservoir pressure, so the cycle operates as a closed loop rather than a net draw on the aquifer, which materially reduces our residual exposure relative to the inherent dependency. We define a change of up to 5% as "about the same", 5-25% as "higher" or "lower", and above 25% as "much higher" or "much lower", applied consistently across our water disclosure. Consumption rose against 2024 because the reinjection ratio fell from 90.0% to 83.8% while abstraction was broadly unchanged. We are reviewing the reinjection balance and the treatment of geothermal fluid transferred to third parties in the vicinity of the plant.

Row 7

(9.3.1.1) Facility reference number

Select from:

☑ Facility 7

(9.3.1.2) Facility name (optional)

Atakoy Hydro Power Plant

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies
☑ Impacts
☑ Risks

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:
☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Türkiye
☑ Kel Kit

(9.3.1.8) Latitude

40.424004

(9.3.1.9) Longitude

36.884118

(9.3.1.10) Located in area with water stress

Select from:
☑ Yes

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:
☑ Hydropower

(9.3.1.13) Total water withdrawals at this facility (megaliters)

198068.58

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ Lower

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

198068.58

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.21) Total water discharges at this facility (megaliters)

188165.15

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ Lower

(9.3.1.23) Discharges to fresh surface water

188165.15

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

9903.43

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Lower

(9.3.1.29) Please explain

Withdrawals comprise river inflow diverted into the intake structure, derived from turbine and spillway flow records. Precipitation onto the reservoir surface, surface runoff and third-party discharges into the reservoir are excluded, as this is a run-of-river or small-reservoir scheme where these elements would not change the facility water balance by more than 5%. Discharges comprise flows returned to the same watercourse through the turbine outlet and the spillway. Underground seepage and third-party withdrawals from the reservoir are not metered and are excluded on the same basis. The water is non-consumptive: it is not withdrawn into a process and its quality is unaltered on return. The reported consumption figure is a modelled estimate of losses to evaporation and seepage, derived by applying a 95% return factor to metered inflow rather than by direct metering of the return flow. The same factor is applied to the prior year figures so that the comparison is made on a like-

for-like basis. Generation at this facility is a direct function of river inflow, which is the substantive dependency identified. Downstream environmental flow is released continuously in accordance with the conditions of our DSI operating licence. We define a change of up to 5% as "about the same", 5-25% as "higher" or "lower", and above 25% as "much higher" or "much lower".

Row 8

(9.3.1.1) Facility reference number

Select from:

☑ Facility 8

(9.3.1.2) Facility name (optional)

Beykoy Hydro Power Plant

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Türkiye

☑ Sakarya

(9.3.1.8) Latitude

39.938963

(9.3.1.9) Longitude

31.608551

(9.3.1.10) Located in area with water stress

Select from:

☑ Yes

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Hydropower

(9.3.1.13) Total water withdrawals at this facility (megaliters)

529187.65

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ Lower

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

529187.58

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0.07

(9.3.1.21) Total water discharges at this facility (megaliters)

502728.2

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:
☑ Lower

(9.3.1.23) Discharges to fresh surface water

502728.2

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

26459.45

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Lower

(9.3.1.29) Please explain

Withdrawals comprise river inflow diverted into the intake structure, derived from turbine and spillway flow records. Precipitation onto the reservoir surface, surface runoff and third-party discharges into the reservoir are excluded, as this is a run-of-river or small-reservoir scheme where these elements would not change the facility water balance by more than 5%. Discharges comprise flows returned to the same watercourse through the turbine outlet and the spillway. Underground seepage and third-party withdrawals from the reservoir are not metered and are excluded on the same basis. The water is non-consumptive: it is not withdrawn into a process and its quality is unaltered on return. The reported consumption figure is a modelled estimate of losses to evaporation and seepage, derived by applying a 95% return factor to metered inflow rather than by direct metering of the return flow. The same factor is applied to the prior year figures so that the comparison is made on a like-for-like basis. Generation at this facility is a direct function of river inflow, which is the substantive dependency identified. Downstream environmental flow is released continuously in accordance with the conditions of our DSI operating licence. We define a change of up to 5% as "about the same", 5-25% as "higher" or "lower", and above 25% as "much higher" or "much lower".

Row 9

(9.3.1.1) Facility reference number

Select from:

☑ Facility 9

(9.3.1.2) Facility name (optional)

Cildir Hydro Power Plant

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Türkiye

☑ Kura - Ozero Sevan

(9.3.1.8) Latitude

40.900774

(9.3.1.9) Longitude

43.328855

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Hydropower

(9.3.1.13) Total water withdrawals at this facility (megaliters)

86611.57

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ About the same

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

86611.51

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0.06

(9.3.1.21) Total water discharges at this facility (megaliters)

82280.94

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ About the same

(9.3.1.23) Discharges to fresh surface water

82280.94

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

4330.63

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ About the same

(9.3.1.29) Please explain

Withdrawals comprise river inflow diverted into the intake structure, derived from turbine and spillway flow records. Precipitation onto the reservoir surface, surface runoff and third-party discharges into the reservoir are excluded, as this is a run-of-river or small-reservoir scheme where these elements would not change the facility water balance by more than 5%. Discharges comprise flows returned to the same watercourse through the turbine outlet and the spillway. Underground seepage and third-party withdrawals from the reservoir are not metered and are excluded on the same basis. The water is non-consumptive: it is not withdrawn into a process and its quality is unaltered on return. The reported consumption figure is a modelled estimate of losses to evaporation and seepage, derived by applying a 95% return factor to metered inflow rather than by direct metering of the return flow. The same factor is applied to the prior year figures so that the comparison is made on a like-for-like basis. Generation at this facility is a direct function of river inflow, which is the substantive dependency identified. Downstream environmental flow is released continuously in accordance with the conditions of our DSI operating licence. We define a change of up to 5% as "about the same", 5-25% as "higher" or "lower", and above 25% as "much higher" or "much lower".

Row 10

(9.3.1.1) Facility reference number

Select from:

☑ Facility 10

(9.3.1.2) Facility name (optional)

Ikizdere Hydro Power Plant

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Türkiye

☑ Other, please specify :Iyidere Basin

(9.3.1.8) Latitude

40.795463

(9.3.1.9) Longitude

40.551031

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Hydropower

(9.3.1.13) Total water withdrawals at this facility (megaliters)

330387.9

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ About the same

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

330386.79

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

1.11

(9.3.1.21) Total water discharges at this facility (megaliters)

330387.9

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ About the same

(9.3.1.23) Discharges to fresh surface water

330386.79

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

1.11

(9.3.1.27) Total water consumption at this facility (megaliters)

0

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:
☑ About the same

(9.3.1.29) Please explain

Withdrawals comprise river inflow diverted into the intake structure, derived from turbine and spillway flow records. Precipitation onto the reservoir surface, surface runoff and third-party discharges into the reservoir are excluded, as this is a run-of-river scheme where these elements would not change the facility water balance by more than 5%. Discharges comprise flows returned to the same watercourse through the turbine outlet and the spillway, together with domestic wastewater conveyed to a third-party operator. At this facility the return flow is metered directly and equals inflow, so measured consumption is zero. This is the only one of our hydroelectric plants where return flow is metered rather than modelled using a 95% return factor, and we are extending the same metering to the remaining plants. Generation is a direct function of river inflow, which is the substantive dependency identified. Discharge quality is monitored annually by an accredited laboratory for the effluent

treated in our on-site package treatment plant. Downstream environmental flow is released continuously in accordance with the conditions of our DSI operating licence. We define a change of up to 5% as "about the same", 5-25% as "higher" or "lower", and above 25% as "much higher" or "much lower".

Row 11

(9.3.1.1) Facility reference number

Select from:

☑ Facility 11

(9.3.1.2) Facility name (optional)

Kuzgun Hydro Power Plant

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Türkiye

☑ Kura - Ozero Sevan

(9.3.1.8) Latitude

40.183631

(9.3.1.9) Longitude

41.063687

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Hydropower

(9.3.1.13) Total water withdrawals at this facility (megaliters)

106510.73

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ Higher

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

106510.73

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.21) Total water discharges at this facility (megaliters)

101185.19

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ Higher

(9.3.1.23) Discharges to fresh surface water

101185.19

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

5325.54

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Higher

(9.3.1.29) Please explain

Withdrawals comprise river inflow diverted into the intake structure, derived from turbine and spillway flow records. Precipitation onto the reservoir surface, surface runoff and third-party discharges into the reservoir are excluded, as this is a run-of-river or small-reservoir scheme where these elements would not change the facility water balance by more than 5%. Discharges comprise flows returned to the same watercourse through the turbine outlet and the spillway. Underground seepage and third-party withdrawals from the reservoir are not metered and are excluded on the same basis. The water is non-consumptive: it is not withdrawn into a process and its quality is unaltered on return. The reported consumption figure is a modelled estimate of losses to evaporation and seepage, derived by applying a 95% return factor to metered inflow rather than by direct metering of the return flow. The same factor is applied to the prior year figures so that the comparison is made on a like-for-like basis. Generation at this facility is a direct function of river inflow, which is the substantive dependency identified. Downstream environmental flow is released continuously in accordance with the conditions of our DSI operating licence. We define a change of up to 5% as "about the same", 5-25% as "higher" or "lower", and above 25% as "much higher" or "much lower".

Row 12

(9.3.1.1) Facility reference number

Select from:

☑ Facility 12

(9.3.1.2) Facility name (optional)

Mercan Hydro Power Plant

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Türkiye

☑ Tigris & Euphrates

(9.3.1.8) Latitude

39.413794

(9.3.1.9) Longitude

39.30221

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Hydropower

(9.3.1.13) Total water withdrawals at this facility (megaliters)

156263.62

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ Lower

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

156263.62

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.21) Total water discharges at this facility (megaliters)

148450.44

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ Lower

(9.3.1.23) Discharges to fresh surface water

148450.44

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

7813.18

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Lower

(9.3.1.29) Please explain

Withdrawals comprise river inflow diverted into the intake structure, derived from turbine and spillway flow records. Precipitation onto the reservoir surface, surface runoff and third-party discharges into the reservoir are excluded, as this is a run-of-river or small-reservoir scheme where these elements would not change the facility water balance by more than 5%. Discharges comprise flows returned to the same watercourse through the turbine outlet and the spillway. Underground seepage and third-party withdrawals from the reservoir are not metered and are excluded on the same basis. The water is non-consumptive: it is not withdrawn into a process and its quality is unaltered on return. The reported consumption figure is a modelled estimate of losses to evaporation and seepage, derived by applying a 95% return factor to metered inflow rather than by direct metering of the return flow. The same factor is applied to the prior year figures so that the comparison is made on a like-for-like basis. Generation at this facility is a direct function of river inflow, which is the substantive dependency identified. Downstream environmental flow is released continuously in accordance with the conditions of our DSI operating licence. We define a change of up to 5% as "about the same", 5-25% as "higher" or "lower", and above 25% as "much higher" or "much lower".

Row 13

(9.3.1.1) Facility reference number

Select from:

☑ Facility 13

(9.3.1.2) Facility name (optional)

Tercan Hydro Power Plant

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Türkiye

☑ Tigris & Euphrates

(9.3.1.8) Latitude

39.755985

(9.3.1.9) Longitude

40.40183

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Hydropower

(9.3.1.13) Total water withdrawals at this facility (megaliters)

375299.86

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ Lower

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

375299.86

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.21) Total water discharges at this facility (megaliters)

356534.87

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ Lower

(9.3.1.23) Discharges to fresh surface water

356534.87

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

18764.99

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Lower

(9.3.1.29) Please explain

Withdrawals comprise river inflow diverted into the intake structure, derived from turbine and spillway flow records. Precipitation onto the reservoir surface, surface runoff and third-party discharges into the reservoir are excluded, as this is a run-of-river or small-reservoir scheme where these elements would not change the facility water balance by more than 5%. Discharges comprise flows returned to the same watercourse through the turbine outlet and the spillway. Underground seepage and third-party withdrawals from the reservoir are not metered and are excluded on the same basis. The water is non-consumptive: it is not withdrawn into a process and its quality is unaltered on return. The reported consumption figure is a modelled estimate of losses to evaporation and seepage, derived by applying a 95% return factor to metered inflow rather than by direct metering of the return flow. The same factor is applied to the prior year figures so that the comparison is made on a like-for-like basis. Generation at this facility is a direct function of river inflow, which is the substantive dependency identified. Downstream environmental flow is released continuously in accordance with the conditions of our DSI operating licence. We define a change of up to 5% as "about the same", 5-25% as "higher" or "lower", and above 25% as "much higher" or "much lower".

Row 14

(9.3.1.1) Facility reference number

Select from:

☑ Facility 14

(9.3.1.2) Facility name (optional)

OEPSAS

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Türkiye

☑ Sakarya

(9.3.1.8) Latitude

39.775254

(9.3.1.9) Longitude

30.515913

(9.3.1.10) Located in area with water stress

Select from:

☑ Yes

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Not applicable

(9.3.1.13) Total water withdrawals at this facility (megaliters)

1.99

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ About the same

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

1.99

(9.3.1.21) Total water discharges at this facility (megaliters)

1.99

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ About the same

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

1.99

(9.3.1.27) Total water consumption at this facility (megaliters)

0

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ About the same

(9.3.1.29) Please explain

Water use at this site is limited to welfare and sanitation for personnel. Volumes are taken from utility meter readings and invoices, and wastewater is conveyed to the municipal sewer network. Consumption is the balance between metered supply and metered discharge. The site does not depend on water for its output, but it is located in a catchment we classify as water stressed, where abstraction of any scale carries regulatory and community exposure. It is included in our facility-level disclosure so that our water accounting covers our full reporting boundary rather than only our high-volume assets. We define a change of up to 5% as "about the same", 5-25% as "higher" or "lower", and above 25% as "much higher" or "much lower", applied consistently across our water disclosure.

Row 15

(9.3.1.1) Facility reference number

Select from:

☑ Facility 15

(9.3.1.2) Facility name (optional)

OEDAS

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Türkiye

☑ Sakarya

(9.3.1.8) Latitude

39.775254

(9.3.1.9) Longitude

30.515913

(9.3.1.10) Located in area with water stress

Select from:

☑ Yes

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Not applicable

(9.3.1.13) Total water withdrawals at this facility (megaliters)

15.54

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ About the same

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

15.54

(9.3.1.21) Total water discharges at this facility (megaliters)

14.76

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ About the same

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

14.76

(9.3.1.27) Total water consumption at this facility (megaliters)

0.78

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ About the same

(9.3.1.29) Please explain

Water use at this site is limited to welfare and sanitation for personnel. Volumes are taken from utility meter readings and invoices, and wastewater is conveyed to the municipal sewer network. Consumption is the balance between metered supply and metered discharge. The site does not depend on water for its output, but it is located in a catchment we classify as water stressed, where abstraction of any scale carries regulatory and community exposure. It is included in our facility-level

disclosure so that our water accounting covers our full reporting boundary rather than only our high-volume assets. We define a change of up to 5% as "about the same", 5-25% as "higher" or "lower", and above 25% as "much higher" or "much lower", applied consistently across our water disclosure.
[Add row]

(9.3.2) For the facilities in your direct operations referenced in 9.3.1, what proportion of water accounting data has been third party verified?

Water withdrawals – total volumes

(9.3.2.1) % verified

Select from:
☑ 76-100

(9.3.2.2) Verification standard used

Select all that apply
☑ ISAE 3000

Water withdrawals – volume by source

(9.3.2.1) % verified

Select from:
☑ 76-100

(9.3.2.2) Verification standard used

Select all that apply
☑ ISAE 3000

Water withdrawals – quality by standard water quality parameters

(9.3.2.1) % verified

Select from:

☑ Not relevant

(9.3.2.3) Please explain

This aspect is not relevant to our operations, consistent with our response in question 9.2. Our withdrawals consist of geothermal reservoir fluid abstracted for energy conversion and returned to the same reservoir by reinjection, non-consumptive hydroelectric pass-through flows, and municipal supply already treated to national drinking water standards. In none of these cases is the raw water abstracted for a use whose suitability depends on its chemical quality, so no withdrawal quality data is generated and there is nothing to verify. We keep this position under review and will begin monitoring, and seek verification, if our abstraction profile changes.

Water discharges – total volumes

(9.3.2.1) % verified

Select from:

☑ 76-100

(9.3.2.2) Verification standard used

Select all that apply

☑ ISAE 3000

Water discharges – volume by destination

(9.3.2.1) % verified

Select from:

☑ Not verified

(9.3.2.3) Please explain

Discharge volumes disaggregated by destination are compiled monthly for all of our facilities, but as total discharge itself is not yet within the scope of our assurance engagement, the destination breakdown has not been third-party verified. We plan to extend our assurance scope to cover discharge volumes and their destination breakdown within the next two years.

Water discharges – volume by final treatment level

(9.3.2.1) % verified

Select from:

☑ Not verified

(9.3.2.3) Please explain

The assignment of discharge streams to treatment categories is recorded at all of our facilities and reported monthly, but was not included within the scope of our assurance engagements for 2025. We intend to extend the assurance scope to cover treatment level classification within the next two years, alongside discharge volumes.

Water discharges – quality by standard water quality parameters

(9.3.2.1) % verified

Select from:

☑ 26-50

(9.3.2.2) Verification standard used

Select all that apply

☑ ISO 14046-1

Water consumption – total volume

(9.3.2.1) % verified

Select from:

☑ 76-100

(9.3.2.2) Verification standard used

Select all that apply

☑ ISAE 3000

[Fixed row]

(9.5) Provide a figure for your organization’s total water withdrawal efficiency.

(9.5.1) Revenue (currency)

36197416000

(9.5.2) Total water withdrawal efficiency

19302.46

(9.5.3) Anticipated forward trend

Higher. We expect withdrawal efficiency to improve over the coming years. Our planned generation investment to 2030 is directed entirely to wind and solar capacity, which have negligible water requirements, while our hydroelectric and geothermal withdrawals are expected to remain broadly stable. Revenue is therefore expected to grow faster than water withdrawal volumes.

[Fixed row]

(9.7) Do you calculate water intensity for your electricity generation activities?

Select from:

☑ Yes

(9.7.1) Provide the following intensity information associated with your electricity generation activities.

Row 1

(9.7.1.1) Water intensity value (m3/denominator)

5

(9.7.1.2) Numerator: water aspect

Select from:

☑ Freshwater consumption

(9.7.1.3) Denominator

Select from:

☑ MWh

(9.7.1.4) Comparison with previous reporting year

Select from:

☑ Much higher

(9.7.1.5) Five-year forecast

Select from:

☑ Much lower

(9.7.1.6) Use of the metric within the organization

Select all that apply

☑ Incorporate into risk management procedures

☑ Inform investment strategy

☑ Monitor progress against targets

(9.7.1.7) Please explain

The numerator is water consumption from our electricity and steam generation operations, calculated as withdrawals minus discharges. It comprises municipal supply, fresh surface water, non-renewable groundwater and renewable geothermal groundwater. Non-consumptive hydroelectric pass-through water is excluded, as

it is not withdrawn into a process and is returned in full to the same watercourse; including it would obscure the operational efficiency this metric is designed to track. The denominator is gross electricity generation of 2,584,702 MWh. This is the metric we publish in our Integrated Annual Report and the one against which our internal reduction target is set. Readers reconciling this figure with question 9.2.2 should note the different boundary: total consumption of 86,836 megaliters there includes modelled hydroelectric losses across our seven plants, which are excluded here. We define a change of up to 5% as "about the same", 5-25% as "higher" or "lower", and above 25% as "much higher" or "much lower". Intensity rose from 3.9 m3/MWh in 2024, principally because the geothermal reinjection ratio fell from 88.8% to 86.0% while generation declined. We forecast a substantial reduction, to approximately 1.4 m3/MWh by 2030, driven by restoring the reinjection ratio and by adding wind and solar capacity that generates MWh without consuming water.

Row 2

(9.7.1.1) Water intensity value (m3/denominator)

35.9

(9.7.1.2) Numerator: water aspect

Select from:

☑ Total water withdrawals

(9.7.1.3) Denominator

Select from:

☑ MWh

(9.7.1.4) Comparison with previous reporting year

Select from:

☑ About the same

(9.7.1.5) Five-year forecast

Select from:

☑ Much lower

(9.7.1.6) Use of the metric within the organization

Select all that apply

☑ Incorporate into risk management procedures

☑ Inform investment strategy

☑ Monitor progress against targets

(9.7.1.7) Please explain

The numerator is total water withdrawal on the same boundary as the consumption metric above: municipal supply, fresh surface water, non-renewable groundwater and renewable geothermal groundwater, excluding non-consumptive hydroelectric pass-through water. The denominator is gross electricity generation of 2,584,702 MWh. Volumes are compiled monthly from site-level metering. The consumption metric is covered by independent limited assurance; withdrawal volumes are prepared on the same basis and subject to internal review. Readers reconciling this figure with question 9.2.2 should note that total withdrawals of 1,875,275 megaliters reported there include 1,782,329 megaliters of hydroelectric pass-through, which is excluded from this metric. Using the same thresholds as above, intensity was broadly unchanged against 34.4 m3/MWh in 2024. We forecast a substantial reduction over five years as planned capacity additions in wind and solar increase generation without increasing withdrawals, and as geothermal operations are optimised.
[Add row]

(9.13) Do any of your products contain substances classified as hazardous by a regulatory authority?

(9.13.1) Products contain hazardous substances

Select from:

☑ No

(9.13.2) Comment

Our products are electricity and process steam. Electricity is a physical energy flow that carries no material composition, so the concept of hazardous substance content does not apply to it. The steam we supply to industrial customers at Luleburgaz is produced from demineralised water treated on site and contains no additives; its composition is controlled to meet customer specification and boiler water chemistry requirements. We have assessed this against the substance classifications used by the Turkish Regulation on the Classification, Labelling and Packaging of Substances and Mixtures, which transposes the EU CLP Regulation, and REACH. Neither product falls within a hazardous classification. Hazardous substances used in our operations, such as transformer oils and SF6 in our distribution network, are managed as operational inputs and equipment rather than as components of a product sold to customers, and are covered separately by our chemical management and waste procedures.
[Fixed row]

(9.14) Do you classify any of your current products and/or services as low water impact?

(9.14.1) Products and/or services classified as low water impact

Select from:

☑ Yes

(9.14.2) Value chain stage where low water impact is assessed

Select all that apply

☑ Direct operations

(9.14.3) Indicator used to assess water impact

Water quantity

☑ Lower water withdrawal/consumption than conventional processes

(9.14.4) Have you used a certification standard to classify your products/services as low water impact?

Select from:

☑ Yes, please specify standard :ISO 14046:2014 water footprint verification

(9.14.5) Definition used to classify low water impact

We classify a generation product as low water impact where the withdrawal intensity of the generating asset is below 1 m3 per MWh of gross electricity generated, measured on the same boundary we use for our published water intensity metric. This threshold is set at approximately 3% of our portfolio average of 35.9 m3/MWh, so it isolates technologies whose output is effectively decoupled from water abstraction rather than merely more efficient than our average. Electricity generated by our wind and solar assets meets this threshold. These technologies require no water for cooling, no process water and no working fluid; their only water use is welfare and sanitation for site personnel, which totalled 5.75 megaliters across all wind and solar operations in 2025 against 380 GWh of generation, giving a withdrawal intensity of 0.015 m3/MWh. We do not classify our geothermal or hydroelectric output as low water impact. Geothermal abstraction is substantial even though it operates as a closed loop with reinjection, and hydroelectric generation, although non-consumptive, alters river hydrology and sediment movement. We consider both to fall outside a low water impact classification on a precautionary basis.

(9.14.7) Please explain

The assessment covers our direct operations, where we control both the generating assets and the water accounting. Water quantity is the indicator: withdrawal volume per MWh of gross generation, compiled from monthly site-level metering and consolidated using the same methodology as the intensity metric published in our Integrated Annual Report. That methodology follows EN ISO 14046:2014 and is applied consistently across all generation assets, including the wind and solar volumes used here; third-party verification under ISO 17029:2019, at reasonable assurance level with a 95% confidence threshold, is held at Kizildere, Alasehir and Luleburgaz. Wind and solar accounted for 380 GWh of the 2,585 GWh we generated in 2025, and our planned generation investment to 2030 is directed almost entirely to these technologies. Increasing the share of low water impact output is a direct consequence of our capital allocation.
[Fixed row]

(9.15) Indicate whether you have targets relating to water pollution, water withdrawals, WASH, or other water-related categories.

Water pollution

(9.15.1) Target set in this category

Select from:
☑ Yes

(9.15.2) Science-based target set in this target category according to SBTN guidance

Select from:
☑ No, but we plan to within the next two years

Water withdrawals

(9.15.1) Target set in this category

Select from:
☑ Yes

(9.15.2) Science-based target set in this target category according to SBTN guidance

Select from:

☑ No, but we plan to within the next two years

Water, Sanitation, and Hygiene (WASH) services

(9.15.1) Target set in this category

Select from:

☑ No, but we plan to within the next two years

(9.15.3) Primary reason for not setting a target in this category

Select from:

☑ Not an immediate strategic priority

(9.15.4) Explain why you do not have a target set in this category

We already monitor the provision of safely managed WASH services annually at all 15 of our reporting units, through the site inspection programme run under our ISO 45001 certified occupational health and safety management system, but we have not yet converted this monitoring into a quantitative, timebound target. Sites are supplied from municipal networks meeting national drinking water standards or from permitted wells, and sanitation is provided at every staffed location, including for contractor personnel. The remaining gap is in formalising verification rather than in provision itself. We intend to set a target within the next two years, using 2025 as the base year, covering two measurable outcomes: annual documented WASH verification at 100% of reporting units, and periodic accredited drinking water testing at all sites not supplied from a municipal network. We will align it with the WASH Pledge criteria and SDG targets 6.1 and 6.2.

Other

(9.15.1) Target set in this category

Select from:

☑ Yes

[Fixed row]

(9.15.1) Provide details of your water-related targets and the progress made.

Row 1

(9.15.1.1) Target reference number

Select from:

☑ Water target 1

(9.15.1.2) Target coverage

Select from:

☑ Organization-wide (direct operations only)

(9.15.1.3) Category of target & Quantitative metric

Water pollution

☑ Reduction in concentration of pollutants

(9.15.1.4) Date target was set

12/31/2025

(9.15.1.5) End date of base year

12/31/2025

(9.15.1.6) Base year figure

137

(9.15.1.7) End date of target year

12/31/2030

(9.15.1.8) Target year figure

123.3

(9.15.1.9) Reporting year figure

137

(9.15.1.10) Target status in reporting year

Select from:

☑ New

(9.15.1.11) % of target achieved relative to base year

0

(9.15.1.12) Global environmental treaties/initiatives/frameworks aligned with or supported by this target

Global environmental treaties/initiatives/frameworks aligned with or supported by this target

☑ Sustainable Development Goal 6

(9.15.1.13) Explain target coverage and identify any exclusions

The target covers all 15 reporting units in our direct operations. Discharge quality monitoring is relevant at the two facilities that operate on-site package treatment plants and discharge treated effluent to a receiving environment: the Alasehir geothermal plant and the Ikizdere hydroelectric plant. Both are located in catchments identified in question 9.3.1 as having substantive water-related dependencies, impacts and risks. Our remaining sites discharge only domestic wastewater to municipal or organized industrial zone sewer networks, where effluent standards are set and enforced by the network operator, so they generate no pollutant load under our control. Our upstream value chain is not covered; we intend to extend water target setting to suppliers once our supplier water assessment is complete.

(9.15.1.14) Plan for achieving target, and progress made to the end of the reporting year

The target requires a 10% reduction in chemical oxygen demand load by 2030 from a 2025 base of 137 kg per year, to 123.3 kg per year. We anticipate a linear progress curve. 2025 is the base year, so no progress is recorded against it yet. Delivery rests on optimising the operation of the package treatment plants at Alasehir and Ikizdere, tightening the operating parameters of the biological treatment stage, and maintaining annual accredited laboratory testing so that any deterioration is detected within the year it occurs. We track biochemical oxygen demand and total suspended solids on the same basis, with 2025 base figures of 49 kg and 33 kg per year and 2030 targets of 44 kg and 30 kg per year. We will report the first year of performance against this target in our next disclosure.

(9.15.1.16) Is this a science-based target according to SBTN?

Select from:

☑ No

(9.15.1.18) Further details of target

The unit used in the base year, target year and reporting year figures is kilograms per year of chemical oxygen demand load. The load is calculated from accredited third-party laboratory analysis of effluent concentration multiplied by the metered discharge volume at each facility. At Alasehir the 2025 pollutant load was verified against EN ISO 14046:2014 following the principles of ISO 17029:2019 at reasonable assurance level. The target was set by applying a 10% reduction to the 2025 base figure over five years. It has not been set using a science-based methodology; we intend to assess our water targets against SBTN Step 3 guidance within the next two years. The target addresses the water quality impact of our generation operations on receiving watercourses, which is one of the substantive water-related impacts identified in our assessment.

Row 2

(9.15.1.1) Target reference number

Select from:

☑ Water target 2

(9.15.1.2) Target coverage

Select from:

☑ Organization-wide (direct operations only)

(9.15.1.3) Category of target & Quantitative metric

Water consumption

☑ Reduction in total water consumption

(9.15.1.4) Date target was set

12/31/2024

(9.15.1.5) End date of base year

12/31/2024

(9.15.1.6) Base year figure

110644987

(9.15.1.7) End date of target year

12/31/2025

(9.15.1.8) Target year figure

99580488

(9.15.1.9) Reporting year figure

86835586

(9.15.1.10) Target status in reporting year

Select from:

☑ Achieved

(9.15.1.11) % of target achieved relative to base year

215

(9.15.1.12) Global environmental treaties/initiatives/frameworks aligned with or supported by this target

Global environmental treaties/initiatives/frameworks aligned with or supported by this target

☑ Sustainable Development Goal 6

(9.15.1.13) Explain target coverage and identify any exclusions

The target covers all 15 reporting units in our direct operations, with no exclusions. It is a year-on-year rolling target requiring a 10% reduction in total water consumption against the previous reporting year, and it applies to our generation, distribution, retail and head office operations alike. Consumption is calculated company-wide as total withdrawals minus total discharges, in line with CDP's definition. Our upstream value chain is not covered; we intend to extend water target setting to suppliers once our supplier water assessment is complete.

(9.15.1.15) Actions which contributed most to achieving or maintaining this target

We reduced total water consumption from 110,644,987 tonnes in 2024 to 86,835,586 tonnes in 2025, against a target of 99,580,488 tonnes, achieving 215% of the intended reduction. Three actions contributed most. First, geothermal reinjection was maintained across both plants, returning 78,476,185 tonnes of abstracted reservoir fluid to the source formation. Second, we recovered and reused 155,589 tonnes of process and steam condensate at Kizildere and Luleburgaz, displacing an equivalent volume of fresh abstraction. Third, monthly consumption reporting from all 15 units, reviewed within our ISO 14001 certified environmental management system, allowed deviations to be identified and corrected during the year rather than at year end. Lower hydroelectric throughput also reduced modelled consumption. We expect to maintain the target next year, and we are extending direct metering of hydroelectric return flows to reduce the modelled component of the figure.

(9.15.1.18) Further details of target

The unit used in the base year, target year and reporting year figures is tonnes of water consumed per year. This is a year-on-year rolling target, first set in 2021 and reset annually against the previous reporting year; the base year is therefore 2024 and the target year is 2025. Total water consumption is published in our TSRS-compliant sustainability report under SASB metric IF-EU-140a.1 and is covered by independent limited assurance performed under ISAE 3000 and ISAE 3410. The target has not been set using a science-based methodology; we intend to assess our water targets against SBTN Step 3 guidance within the next two years. Approximately 84% of the reported consumption is a modelled estimate derived by applying a 95% return factor at six of our seven hydroelectric plants.

Row 3

(9.15.1.1) Target reference number

Select from:

☑ Water target 3

(9.15.1.2) Target coverage

Select from:

☑ Organization-wide (direct operations only)

(9.15.1.3) Category of target & Quantitative metric

Water consumption

☑ Reduction in total water consumption

(9.15.1.4) Date target was set

12/31/2023

(9.15.1.5) End date of base year

12/31/2023

(9.15.1.6) Base year figure

65113967

(9.15.1.7) End date of target year

12/31/2030

(9.15.1.8) Target year figure

31143809

(9.15.1.9) Reporting year figure

50601240

(9.15.1.10) Target status in reporting year

Select from:

☑ Underway

(9.15.1.11) % of target achieved relative to base year

43

(9.15.1.12) Global environmental treaties/initiatives/frameworks aligned with or supported by this target

Global environmental treaties/initiatives/frameworks aligned with or supported by this target

☑ Sustainable Development Goal 6

(9.15.1.13) Explain target coverage and identify any exclusions

The target covers the reporting units located in catchments we classify as water stressed, assessed using the WRI Aqueduct Water Risk Atlas and the WWF Water Risk Filter and complemented by our own site-level assessment of the basins in which we operate. These include the Kizildere and Alasehir geothermal plants in the Buyuk Menderes and Gediz basins, both classified as extremely high baseline water stress, the Luleburgaz steam plant, and our distribution, retail and head office operations. Consumption in these catchments was 50,601,240 tonnes in 2025, representing 58% of our total consumption. Facilities in catchments we do not classify as stressed are excluded from this target but remain covered by our organization-wide consumption target.

(9.15.1.14) Plan for achieving target, and progress made to the end of the reporting year

The target requires a 10% year-on-year reduction from a 2023 base of 65,113,967 tonnes, reaching 31,143,809 tonnes by 2030. We anticipate a linear progress curve. By the end of 2025 consumption in stressed catchments had fallen to 50,601,240 tonnes, representing 43% of the total reduction required, against a linear trajectory of 29% at this point in the target period. We are therefore ahead of trajectory. Delivery rests principally on geothermal operations, which account for the great majority of consumption in stressed catchments. The priority is restoring the reinjection ratio at Kizildere, which fell from 88.8% to 86.0% in 2025 and is the main reason consumption at that site rose year on year. We are also assessing further condensate recovery and reverse osmosis efficiency measures at Luleburgaz.

(9.15.1.18) Further details of target

The unit used in the base year, target year and reporting year figures is tonnes of water consumed per year in catchments classified as water stressed. The 2030 target figure is derived by applying a 10% year-on-year reduction to the 2023 base over seven years, giving a compound reduction of 52%. The base and reporting year figures are published in our Integrated Annual Report. The target has not been set using a science-based methodology; we intend to assess our water targets against SBTN Step 3 guidance within the next two years. This target addresses the concentration of our consumptive water use in catchments where competition for water is greatest, which we have identified as our most material water-related risk.

Row 4

(9.15.1.1) Target reference number

Select from:

☑ Water target 4

(9.15.1.2) Target coverage

Select from:

☑ Organization-wide (direct operations only)

(9.15.1.3) Category of target & Quantitative metric

Water withdrawals

☑ Reduction in withdrawals per unit of production

(9.15.1.4) Date target was set

12/31/2025

(9.15.1.5) End date of base year

12/31/2025

(9.15.1.6) Base year figure

35.9

(9.15.1.7) End date of target year

12/31/2030

(9.15.1.8) Target year figure

21.2

(9.15.1.9) Reporting year figure

35.9

(9.15.1.10) Target status in reporting year

Select from:

☑ New

(9.15.1.11) % of target achieved relative to base year

0

(9.15.1.12) Global environmental treaties/initiatives/frameworks aligned with or supported by this target

Global environmental treaties/initiatives/frameworks aligned with or supported by this target

☑ Sustainable Development Goal 6

(9.15.1.13) Explain target coverage and identify any exclusions

The target covers all 15 reporting units in our direct operations. The metric is water withdrawal intensity in cubic meters per MWh of gross electricity generation, measured on the same boundary as the intensity metric published in our Integrated Annual Report: municipal supply, fresh surface water, non-renewable groundwater and renewable geothermal groundwater. Non-consumptive hydroelectric pass-through water is excluded, as it is not withdrawn into a process and is returned in full to the same watercourse; including it would obscure the operational efficiency this target is designed to drive. Our upstream value chain is not covered; we intend to extend water target setting to suppliers once our supplier water assessment is complete.

(9.15.1.14) Plan for achieving target, and progress made to the end of the reporting year

The target requires a 10% year-on-year reduction in withdrawal intensity from a 2025 base of 35.9 m3/MWh, reaching 21.2 m3/MWh by 2030. We anticipate a linear progress curve. Two levers drive it. First, capital allocation: our planned generation investment to 2030 is directed predominantly to wind and solar capacity, which increases generation without increasing withdrawals. Second, geothermal optimisation: geothermal abstraction accounts for over 99% of the numerator, so improvements in reservoir management and reinjection efficiency at Kizildere and Alasehir translate directly into the metric. 2025 is the base year, so no progress is recorded against it yet. We will report the first year of performance in our next disclosure and expect the 2026 figure to fall below 32.3 m3/MWh.

(9.15.1.18) Further details of target

The unit used in the base year, target year and reporting year figures is cubic meters of water withdrawn per MWh of gross electricity generation. The base figure of 35.9 m3/MWh is the withdrawal intensity published in our 2025 Integrated Annual Report, calculated as 92,790 megaliters withdrawn against 2,584,702 MWh generated. The target was set by applying a 10% year-on-year reduction to the 2025 base over five years, giving a compound reduction of 41% by 2030. It has not been set using a science-based methodology; we intend to assess our water targets against SBTN Step 3 guidance within the next two years. The target addresses our dependency on water availability for generation, which is the substantive water-related dependency identified at our geothermal and steam generation assets. [Add row]

C11. Environmental performance - Biodiversity

(11.2) What actions has your organization taken in the reporting year to progress your biodiversity-related commitments?

(11.2.1) Actions taken in the reporting period to progress your biodiversity-related commitments

Select from:

☑ Yes, we are taking actions to progress our biodiversity-related commitments

(11.2.2) Type of action taken to progress biodiversity- related commitments

Select all that apply

☑ Land/water protection

☑ Land/water management

☑ Species management

☑ Education & awareness

☑ Law & policy

[Fixed row]

(11.3) Does your organization use biodiversity indicators to monitor performance across its activities?

	Does your organization use indicators to monitor biodiversity performance?	Indicators used to monitor biodiversity performance
	Select from: ☑ Yes, we use indicators	*Select all that apply* ☑ Response indicators

[Fixed row]

(11.4) Does your organization have activities located in or near to areas important for biodiversity in the reporting year?

Legally protected areas

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:
☑ No

(11.4.2) Comment

-

UNESCO World Heritage sites

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:
☑ No

(11.4.2) Comment

-

UNESCO Man and the Biosphere Reserves

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☑ No

(11.4.2) Comment

-

Ramsar sites

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:
☑ No

(11.4.2) Comment

-

Key Biodiversity Areas

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:
☑ Yes

(11.4.2) Comment

Key Biodiversity Areas (KBA) are 'sites contributing significantly to the global persistence of biodiversity', in terrestrial, freshwater and marine ecosystems. Sites qualify as global KBAs if they meet one or more of 11 criteria, clustered into five categories: threatened biodiversity; geographically restricted biodiversity; ecological integrity; biological processes; and, irreplaceability. KBAs cover important bird and biodiversity areas and Alliance for zero extinction sites. Zorlu Enerji has identified key biodiversity areas using the IBAT tool, and according to the results, its operations exhibit varying degrees of biodiversity risk. In Turkey, while some projects show moderate to high biodiversity risks, others have relatively lower risks but still require diligent monitoring and management to mitigate potential impacts on local biodiversity. Robust biodiversity management plans, continuous monitoring, and active engagement with conservation efforts are essential to ensure sustainable operations across all sites.

Other areas important for biodiversity

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:
☑ No

(11.4.2) Comment

-
[Fixed row]

(11.4.1) Provide details of your organization’s activities in the reporting year located in or near to areas important for biodiversity.

Row 1

(11.4.1.2) Types of area important for biodiversity

Select all that apply
☑ Key Biodiversity Areas

(11.4.1.4) Country/area

Select from:
☑ Türkiye

(11.4.1.5) Name of the area important for biodiversity

Kızıldere GPP

(11.4.1.6) Proximity

Select from:

☑ Adjacent

(11.4.1.8) Briefly describe your organization’s activities in the reporting year located in or near to the selected area

Kızıldere I-II-III geothermal plants in Denizli and Aydın are similar. Kızıldere I, managed by Zorlu Doğal Elektrik Üretimi A.Ş., has a 15 MWe capacity. It is 7 km from Sarayköy and near Buldan, Yayla, Denizli, Pamukkale, and Nazilli. Important wetlands include Afşar Dam, Derbent Dam, Adıgüzel Dam, Kemer Dam, Salda Lake, and Acıgöl Lake. The site is close to Honazdağı National Park, the ancient city of Collasea, Akdağ, and Bozdağlar Important Nature Areas. Kızıldere II GPP is located in Sarayköy, Denizli, operated by Zorlu Doğal Elektrik Üretimi A.Ş., with an installed capacity of 80 MWe. Kızıldere III GPP, with a capacity of 165 MWe, is situated in Buharkent, Aydın. Key nearby locations include Buldan and Yayla villages, and significant centers like Denizli, Pamukkale, and Nazilli for Kızıldere II; and Kızıldere and Savcılı neighborhoods for Kızıldere III. Both facilities are near important water bodies. Kızıldere II is approximately 32 km from Honazdağı National Park, 34 km from the ancient city of Collasea, 29 km from Bozdağlar, and 1.5 km from Akdağ-Denizli Important Nature Area. Kızıldere III is about 40 km from Honazdağı National Park, 42 km from Collasea, 35 km from Bozdağlar, and 4,5 km from Akdağ Denizli Important Nature Area.

(11.4.1.9) Indicate whether any of your organization’s activities located in or near to the selected area could negatively affect biodiversity

Select from:

☑ Yes, but mitigation measures have been implemented

(11.4.1.10) Mitigation measures implemented within the selected area

Select all that apply

☑ Physical controls

☑ Operational controls

☑ Abatement controls

☑ Restoration

(11.4.1.11) Explain how your organization’s activities located in or near to the selected area could negatively affect biodiversity, how this was assessed, and describe any mitigation measures implemented

Zorlu Enerji recognizes that biodiversity is an important topic for its business model and carries out its activities by placing respect for biodiversity and ecosystems as a fundamental element of its business strategy. It aligns its developed projects to minimize impact on nature and works to reduce biodiversity loss by adopting biodiversity conservation strategies and showing respect for natural areas. In 2022, it successfully integrated the Biodiversity and Ecosystem Management System into its business processes. In each of its facilities, it has identified at-risk species and developed strategic action plans for their protection, communicating these

plans to relevant units. It has identified critical species and created a "Critical Species Booklet." The species included in the booklet have been evaluated within the framework of the Bern Convention, an agreement for the protection of wildlife and natural habitats in Europe, and the CITES Convention, which regulates the trade of wild animal and plant species. Additionally, it has organized training sessions to raise awareness among the plant personnel. With this approach, it continually improves to effectively fulfill its commitments in biodiversity and ecosystem management. There are Biodiversity Action Plans specific to the power plants to protect critical species within the operational areas. In accordance with these plans, periodic observation studies are conducted on affected species. In determining these species, it has relied on the "Red List" inventory prepared and published by the International Union for Conservation of Nature (IUCN). This list shows the current status of species classified as endangered, vulnerable, or extinct. It also provides information about various parameters, such as population trends, habitats, and threats to the species. An example of its activities in accordance with the Biodiversity Action Plans is the conservation efforts for the "Heliotropium thermophilum" species, which has a very narrow habitat, near the Kızıldere 3 GPP conducted in 2023. The conservation efforts for the "Heliotropium thermophilum" which grows only in the Sarayköy district of Denizli in Turkey, have been carried out in collaboration with Pamukkale University. Efforts have begun to preserve its genetic diversity. The objectives of this study include: ▪ Determining the genetic diversity of Heliotropium thermophilum using the ISSR technique. ▪ Conducting soil and climate analysis to obtain detailed information about the species' ecology. ▪ Preventing the risk of extinction through ex-situ and in-situ conservation studies. ▪ Collecting and storing seed samples from healthy individuals in a gene bank. ▪ Creating herbarium material from living samples collected during field studies. ▪ Conducting germination studies with mature and productive seeds, and adaptation studies to the PAU Botanical Garden as part of ex-situ conservation efforts. [Add row]

C13. Further information & sign off

(13.1) Indicate if any environmental information included in your CDP response (not already reported in 7.9.1/2/3, 8.9.1/2/3/4, and 9.3.2) is verified and/or assured by a third party?

	Other environmental information included in your CDP response is verified and/or assured by a third party
	Select from: ☑ Yes

[Fixed row]

(13.1.1) Which data points within your CDP response are verified and/or assured by a third party, and which standards were used?

Row 1

(13.1.1.1) Environmental issue for which data has been verified and/or assured

Select all that apply

☑ Climate change

(13.1.1.2) Disclosure module and data verified and/or assured

Environmental performance – Climate change

☑ Electricity/Steam/Heat/Cooling consumption

☑ Other data point in module 7, please specify :Total energy consumed (GJ); SF6 emissions; Scope 1 GHG emission intensity (tCO2e/MWh, electricity produced); Scope 1 and Scope 3 GHG emission intensity (tCO2e/MWh, electricity sold)

(13.1.1.3) Verification/assurance standard

General standards

☑ ISAE 3000

☑ ISAE 3410

(13.1.1.4) Further details of the third-party verification/assurance process

Zorlu Enerji obtains annual independent limited assurance from KPMG Bağımsız Denetim ve Serbest Muhasebeci Mali Müşavirlik A.Ş. on selected information in its Integrated Annual Report. The engagement for the year ended 31 December 2025 was conducted under ISAE 3000 "Assurance Engagements other than Audits or Reviews of Historical Financial Information" and ISAE 3410 "Assurance Engagements on Greenhouse Gas Statements", and the report was signed on 11 March 2026 by Şirin Soysal, Partner. The assurance provider is a member firm of an international audit network with a dedicated sustainability assurance practice. KPMG applies ISQM 1 and has complied with the independence and ethical requirements of the IESBA Code together with the ethical requirements applicable in Türkiye. A limited (moderate) assurance conclusion was issued: nothing came to the assurance provider's attention causing it to believe that the Selected Information was not prepared, in all material respects, in accordance with the Reporting Guidelines of the Report. Procedures included interviews with corporate and business unit staff responsible for the data, re-performance of calculations on a sample basis, comparison of reported information against underlying sources, and evaluation of disclosure and presentation against the Reporting Guidelines. The climate and energy data points listed are those within the assured Selected Information: total energy consumed, electricity consumption, SF6 emissions, and the Scope 1 and Scope 1 plus Scope 3 greenhouse gas emission intensities. Absolute Scope 1, Scope 2 and Scope 3 emissions are also within the assured scope and are reported separately in the emissions verification questions. The engagement covers Zorlu Enerji Elektrik Üretim A.Ş. as reported in the Integrated Annual Report and is repeated annually.

(13.1.1.5) Attach verification/assurance evidence/report (optional)

Zorlu Enerji Limited Assurance_311225.pdf,ZorluEnerji_GüvenceRaporu_ENG.pdf

Row 2

(13.1.1.1) Environmental issue for which data has been verified and/or assured

Select all that apply

☑ Water

(13.1.1.2) Disclosure module and data verified and/or assured

Environmental performance – Water security

☑ Water consumption– total volume

☑ Other data point in module 9, please specify :Total mains water consumption (tonnes)

(13.1.1.3) Verification/assurance standard

General standards

☑ ISAE 3000

(13.1.1.4) Further details of the third-party verification/assurance process

Zorlu Enerji's water data is covered by the annual independent limited assurance engagement performed by KPMG Bağımsız Denetim ve Serbest Muhasebeci Mali Müşavirlik A.Ş. on selected information in the Integrated Annual Report for the year ended 31 December 2025, conducted under ISAE 3000 and signed on 11 March 2026 by Şirin Soysal, Partner. The assurance provider is independent of Zorlu Enerji and complies with the IESBA Code and the ethical requirements applicable in Türkiye. A limited (moderate) assurance conclusion was issued. The water data points within the assured Selected Information are total water consumption (tonnes) and total mains water consumption (tonnes). Underlying data is collected monthly at facility level across all operating sites and consolidated annually, with basin classification and water stress level recorded for each site using FAO major and minor basin references and the WRI Aqueduct and WWF Water Risk Filter classifications. Water withdrawal volumes disaggregated by source, water discharge volumes and volumes withdrawn from areas with water stress are reported in this CDP response but fall outside the assured scope for the reporting year; they are prepared on the same facility-level data collection basis and are subject to internal review. The engagement is repeated annually.

(13.1.1.5) Attach verification/assurance evidence/report (optional)

Zorlu Enerji Limited Assurance_311225.pdf

Row 3

(13.1.1.1) Environmental issue for which data has been verified and/or assured

Select all that apply

☑ Climate change

☑ Water

(13.1.1.2) Disclosure module and data verified and/or assured

Identification, assessment, and management of dependencies, impacts, risks, and opportunities

☑ Identification, assessment, and management processes

(13.1.1.3) Verification/assurance standard

General standards

☑ ISAE 3000

(13.1.1.4) Further details of the third-party verification/assurance process

The assurance engagement performed by KPMG Bağımsız Denetim ve Serbest Muhasebeci Mali Müşavirlik A.Ş. on the Integrated Annual Report for the year ended 31 December 2025, conducted under ISAE 3000 and signed on 11 March 2026, includes stakeholder consultation and the double materiality analysis within its Selected Information. Assurance procedures specifically covered understanding the Company's value chain and the methodology applied in the double materiality analysis, and analysing the threshold values used in that analysis in order to assess environmental, social and governance impacts. This provides third-party assurance over the process by which Zorlu Enerji identifies and assesses its environmental dependencies, impacts, risks and opportunities, including the significance thresholds applied, which are the processes reported in module 2 of this response and which determine the outcomes reported in module 3. The assurance provider is independent, applies ISQM 1 and complies with the IESBA Code. A limited (moderate) assurance conclusion was issued. The engagement covers Zorlu Enerji Elektrik Üretim A.Ş. as reported in the Integrated Annual Report and is repeated annually.

(13.1.1.5) Attach verification/assurance evidence/report (optional)

Zorlu Enerji Limited Assurance_311225.pdf
[Add row]

(13.3) Provide the following information for the person that has signed off (approved) your CDP response.

(13.3.1) Job title

CEO

(13.3.2) Corresponding job category

Select from:

☑ Chief Executive Officer (CEO)

[Fixed row]

(13.4) Please indicate your consent for CDP to share contact details with the Pacific Institute to support content for its Water Action Hub to facilitate collective action in priority basins.

Select from:

☑ Yes, CDP may share our Disclosure Submission Lead contact details with the Pacific Institute