



ZORLU ENERJİ ELEKTRİK ÜRETİM A.Ş.

2025 CDP Corporate Questionnaire 2025

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.

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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 881.37 MW—70% 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, and natural gas-based assets, with 92% of our installed capacity in Turkey derived from renewable sources. We are also the market leader in geothermal energy, contributing approximately 20% 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 4,000 EV charging stations across 1,700+ locations under our ZES (Zorlu Energy Solutions) brand 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

12/30/2024

(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:

☒ 2 years

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

Select from:

☒ 2 years

(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?

29657596000

(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: <input checked="" type="checkbox"/> 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

☒ Israel

☒ Pakistan

☒ Turkey

(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

Lignite

(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:

☒ No

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)

1952487

(1.16.1.4) Net electricity generation (GWh)

1558.18

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)

118.94

(1.16.1.3) Gross electricity generation (GWh)

337.27

(1.16.1.4) Net electricity generation (GWh)

335.59

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)

414.55

(1.16.1.4) Net electricity generation (GWh)

412.15

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)

1.5

(1.16.1.3) Gross electricity generation (GWh)

1.98

(1.16.1.4) Net electricity generation (GWh)

1.98

Marine

(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)

616.84

(1.16.1.3) Gross electricity generation (GWh)

1953240.8

(1.16.1.4) Net electricity generation (GWh)

(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

(1.24.7) 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]

(1.24.1) Have you mapped where in your direct operations or elsewhere in your value chain plastics are produced, commercialized, used, and/or disposed of?

(1.24.1.1) Plastics mapping

Select from:

☒ No, and we do not plan to within the next two years

(1.24.1.5) Primary reason for not mapping plastics in your value chain

Select from:

☒ Judged to be unimportant or not relevant

(1.24.1.6) Explain why your organization has not mapped plastics in your value chain

According to our business model, plastics usage is relatively quite less and there is no input of plastics in our process. Also in the category of purchased goods, plastics have less than 1%.

[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)

(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)

(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: <input checked="" type="checkbox"/> Yes	Select from: <input checked="" type="checkbox"/> 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: <input checked="" type="checkbox"/> Yes	Select from: <input checked="" type="checkbox"/> Both risks and opportunities	Select from: <input checked="" type="checkbox"/> 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

(2.2.2.7) Type of assessment

Select from:

- ☒ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

- ☒ More than once a year

(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
- ☒ Local
- ☒ Sub-national
- ☒ National

(2.2.2.12) Tools and methods used

Commercially/publicly available tools

- ☒ IBAT for Business
- ☒ TNFD – Taskforce on Nature-related Financial Disclosures

Enterprise Risk Management

- ☒ COSO Enterprise Risk Management Framework

- ✓ Enterprise Risk Management
- ✓ Internal company methods
- ✓ ISO 31000 Risk Management Standard
- ✓ Risk models

International methodologies and standards

- ✓ Environmental Impact Assessment
- ✓ IPCC Climate Change Projections
- ✓ ISO 14001 Environmental Management Standard

Databases

- ✓ Nation-specific databases, tools, or standards
- ✓ Regional government databases

Other

- ✓ Scenario analysis
- ✓ Desk-based research
- ✓ External consultants
- ✓ Materiality assessment
- ✓ Internal company methods
- ✓ Partner and stakeholder consultation/analysis

(2.2.2.13) Risk types and criteria considered

Acute physical

- ✓ Drought
- ✓ Avalanche
- ✓ Landslide
- ✓ Wildfires
- ✓ Heat waves
- ✓ Cold wave/frost
- ✓ Heavy precipitation (rain, hail, snow/ice)
- ✓ Flood (coastal, fluvial, pluvial, ground water)
- ✓ Storm (including blizzards, dust, and sandstorms)

Chronic physical

- ✓ Heat stress
- ✓ Soil erosion
- ✓ Water stress
- ✓ Changing wind patterns
- ✓ Temperature variability

- ✓ Precipitation or hydrological variability
- ✓ Increased severity of extreme weather events
- ✓ Water availability at a basin/catchment level
- ✓ Changing temperature (air, freshwater, marine water)
- ✓ Changing precipitation patterns and types (rain, hail, snow/ice)

Policy

- ✓ Carbon pricing mechanisms
- ✓ Changes to national legislation
- ✓ Poor coordination between regulatory bodies
- ✓ Poor enforcement of environmental regulation
- ✓ Increased difficulty in obtaining operations permits

- ✓ Changes to international law and bilateral agreements
- ✓ Lack of mature certification and sustainability standards

Market

- ✓ Uncertainty in the market signals

Reputation

- ✓ Increased partner and stakeholder concern and partner and stakeholder negative feedback
- ✓ Negative press coverage related to support of projects or activities with negative impacts on the environment (e.g. GHG emissions, deforestation & conversion, water stress)
- ✓ Stigmatization of sector

Technology

- ✓ Transition to lower emissions technology and products
- ✓ Unsuccessful investment in new technologies

Liability

- ✓ Exposure to litigation
- ✓ Non-compliance with regulations
- ✓ Other liability, please specify :Fin services. kredi süreçleri ve bankaların sorgulaması.

(2.2.2.14) Partners and stakeholders considered

Select all that apply

- | | |
|---|--|
| <input checked="" type="checkbox"/> NGOs | <input checked="" type="checkbox"/> Regulators |
| <input checked="" type="checkbox"/> Customers | <input checked="" type="checkbox"/> Local communities |
| <input checked="" type="checkbox"/> Employees | <input checked="" type="checkbox"/> Other, please specify :Shareholders. (Zorlu) |
| <input checked="" type="checkbox"/> Investors | |
| <input checked="" type="checkbox"/> Suppliers | |

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

Select from:

- ☒ No

(2.2.2.16) 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, opportunities 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.

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

(2.2.2.7) Type of assessment

Select from:

- ☒ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

- ☒ More than once a year

(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
- ☒ Local
- ☒ Sub-national
- ☒ National

(2.2.2.12) Tools and methods used

Commercially/publicly available tools

- ☒ IBAT for Business
- ☒ SEDEX
- ☒ TNFD – Taskforce on Nature-related Financial Disclosures
- ☒ WRI Aqueduct
- ☒ WWF Water Risk Filter

Enterprise Risk Management

- ☒ Risk models
- ☒ Stress tests
- ☒ Internal company methods
- ☒ Enterprise Risk Management
- ☒ ISO 31000 Risk Management Standard

- ☒ COSO Enterprise Risk Management Framework

International methodologies and standards

- ☒ Environmental Impact Assessment
- ☒ IPCC Climate Change Projections
- ☒ ISO 14001 Environmental Management Standard
- ☒ ISO 14046 Environmental Management – Water Footprint
- ☒ Other international methodologies and standards, please specify :WWF Biodiversity Risk Filter (xx)

Databases

- ☒ Nation-specific databases, tools, or standards
- ☒ Regional government databases

Other

- ☒ Scenario analysis
- ☒ Desk-based research
- ☒ External consultants
- ☒ Materiality assessment
- ☒ Internal company methods
- ☒ Partner and stakeholder consultation/analysis

(2.2.2.13) Risk types and criteria considered

Chronic physical

- ☒ Water stress
- ☒ Saline intrusion
- ☒ Precipitation or hydrological variability
- ☒ Increased severity of extreme weather events

- ☒ Groundwater depletion
- ☒ Temperature variability
- ☒ Water quality at a basin/catchment level

Policy

- ☒ Changes to national legislation
- ☒ Regulation of discharge quality/volumes
- ☒ Limited or lack of river basin management
- ☒ Poor coordination between regulatory bodies
- ☒ Poor enforcement of environmental regulation

Market

- ☒ Uncertainty in the market signals

Reputation

- ☒ Increased partner and stakeholder concern and partner and stakeholder negative feedback
- ☒ Negative press coverage related to support of projects or activities with negative impacts on the environment (e.g. GHG emissions, deforestation & conversion, water stress)
- ☒ Stakeholder conflicts concerning water resources at a basin/catchment level
- ☒ Stigmatization of sector

Technology

- ☒ Dependency on water-intensive energy sources

Liability

- ☒ Exposure to litigation
- ☒ Non-compliance with regulations

- ☒ Water availability at a basin/catchment level

- ☒ Increased difficulty in obtaining operations permits
- ☒ Changes to international law and bilateral agreements
- ☒ Lack of mature certification and sustainability standards
- ☒ Increased difficulty in obtaining water withdrawals permit
- ☒ Statutory water withdrawal limits/changes to water allocation

(2.2.2.14) Partners and stakeholders considered

Select all that apply

- ☒ NGOs
- ☒ Regulators

- ☒ Customers
- ☒ Employees
- ☒ Investors
- ☒ Suppliers

- ☒ Local communities
- ☒ Water utilities at a local level
- ☒ Other water users at the basin/catchment level

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

Select from:

- ☒ No

(2.2.2.16) 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, opportunities 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.

[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 Risk Filter.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

Substantive effects at Zorlu Enerji are defined as circumstances that significantly impact our business operations and influence our strategic and financial decision-making. A substantive effect occurs when a financial event or risk materially affects our performance, business continuity, or long-term objectives. We define a significant financial impact as any situation where the effect exceeds 2.1% of our net income, directly linked to our revenue streams. This threshold allows us to prioritize the most relevant financial indicators that directly reflect our business health. Our risk management framework prioritizes risks based on their financial impacts, ensuring we allocate resources effectively to mitigate critical risks. By categorizing risks systematically, we align our risk management strategies to match the potential consequences of each risk. This proactive approach helps us address risks before they escalate and impact our operations or strategic targets. For the reporting year, Zorlu Enerji has established clear quantitative thresholds to classify financial impacts from risks and opportunities into low, medium, and high categories, allowing us to evaluate the severity and urgency of each risk: Low impact: Financial consequences of less than TL 30 million. Medium impact: Financial consequences between TL 30 million and TL 300 million. High impact: Financial consequences of TL 300 million or more. These categories offer a structured framework for evaluating financial risks and opportunities. Low-impact risks are managed through routine operational measures, while medium- and high-impact risks demand strategic intervention and board-level attention. This structured approach also ensures that even small risks are identified and addressed early, preventing their escalation into more substantial challenges. In addition to immediate financial risks, we also assess long-term risks related to market dynamics, regulatory changes, and environmental factors, which may not have an immediate impact but could significantly affect our financial performance over time. This comprehensive

approach allows Zorlu Enerji to remain resilient and adaptive in a rapidly changing energy landscape, supporting sustainable growth while minimizing negative financial effects.

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

Substantive effects in terms of opportunities are defined as circumstances where an increase in market share by 1% or more, has a significant impact on the company's competitive position and overall business operations. This threshold is particularly important in sectors where market dynamics are sensitive to shifts in consumer demand, regulatory changes, or technological advancements. For Zorlu Enerji, an increase in market share by at least 1% signals a substantive opportunity. This gain can arise from enhanced competitiveness due to our investments in renewable energy technologies, smart energy solutions, and electric vehicle infrastructure. In this context, our ability to capture additional market share may lead to increased revenue streams and strengthened positioning within the energy sector. Such an opportunity aligns with our medium- and long-term strategic goals for expanding our sustainable energy offerings. The likelihood of this effect occurring is regularly assessed based on market trends, customer demand for sustainable energy solutions, and our ongoing efforts to innovate and adapt to new technologies. The time horizon for realizing such an increase in market share typically spans the medium-term (2-4 years), reflecting the time needed to fully implement new projects and integrate advanced energy solutions into our service offerings. The frequency of this effect is monitored through periodic market assessments, allowing us to identify shifts in demand and competitive positioning. By keeping a close watch on market movements and customer behavior, we are able to respond quickly to emerging opportunities and leverage our expertise in clean energy technologies. In summary, Zorlu Enerji views a 1% or greater increase in market share as a substantive effect because it represents a significant opportunity to grow our business, enhance financial performance, and further advance our sustainability goals. By focusing on these opportunities, we are able to solidify our position as a leader in the transition to a low-carbon economy.

[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) How potential water pollutants are identified and classified

The discharged water is domestic wastewater. Therefore, it does not have a pesticides or related pollution impact. An accredited laboratory analyzes our treated wastewater periodically to comply with the Turkish Water Pollution Control Regulation. BOD, COD, TSS, and pH parameters are analyzed periodically.

[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

The discharged water has BOD, COD, TSS, and pH pollutant load. Since the water is treated before discharge, the pollutant load is decreased under regulation limits.

(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

- ☒ Water recycling
- ☒ Discharge treatment using sector-specific processes to ensure compliance with regulatory requirements

(2.5.1.5) Please explain

The discharged water is domestic wastewater. Therefore, it does not have a significant pollution impact. However the pollutant parameters (BOD, COD, TSS, and pH) are monitored and analyzed by a third party laboratory periodically. The pollutant parameter loads in the treated wastewater must be below the limit values specified in the regulation.

[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, both in direct operations and upstream/downstream value chain

Water

(3.1.1) Environmental risks identified

Select from:

☒ Yes, both in direct operations and upstream/downstream value chain

Plastics

(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

According to our business model, plastics usage is relatively quite less and there is no input of plastics in our process. Also in the category of purchased goods, plastics have less than 1%.

[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

Policy

☒ Changes to national legislation

(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

☒ Turkey

(3.1.1.9) Organization-specific description of risk

Rapidly changing regulations and policies in the energy sector can affect the feasibility and costs of projects. Failure to comply with new regulations may result in legal sanctions and increased costs. The lack of market conditions and financial instruments for low-carbon technologies can hinder their adoption and contribution to sustainable development. Not reducing Scope 1, 2, and 3 emissions increases the risk of non-compliance with regulations and potential penalties, while insufficient government support for renewable energy investments and inadequate regulatory frameworks can give rise to transition climate risks.

(3.1.1.11) Primary financial effect of the risk

Select from:

- ☒ Increased capital expenditures

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

Select all that apply

- ☒ Short-term
- ☒ Medium-term
- ☒ 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

With the implementation of the Climate Law in Türkiye and the anticipated enforcement of the EU Carbon Border Adjustment Mechanism (CBAM), significant impacts are expected on our compliance processes and cost structures.

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

Select from:

☒ Yes

(3.1.1.19) Anticipated financial effect figure in the short-term – minimum (currency)

2103707431

(3.1.1.20) Anticipated financial effect figure in the short-term – maximum (currency)

2103707431

(3.1.1.21) Anticipated financial effect figure in the medium-term – minimum (currency)

3248009697

(3.1.1.22) Anticipated financial effect figure in the medium-term – maximum (currency)

3248009697

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

3908131982

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

3908131982

(3.1.1.25) Explanation of financial effect figure

To assess the financial impacts of transition climate risks, we have estimated the potential carbon costs that could arise from our projected future emissions. In this approach, the company's forecasted Scope 1, 2, and 3 emissions (tCO₂e) for each future year were multiplied by the projected carbon price applicable to that year (USD/tCO₂e). This calculation allowed us to quantify the potential annual carbon cost burden that could emerge under future regulatory frameworks. Additionally, to reflect the net financial effect, potential revenues from low-carbon market instruments — such as the sales of I-REC certificates, YEK-G certificates, and carbon credits — were also considered. The difference between these potential revenues and the projected carbon cost burdens was used to estimate the net financial impact of transition risks. This financial quantification was conducted considering that carbon pricing is expected to be implemented in Türkiye starting from 2027, with carbon prices projected to increase from approximately 11.6 EUR/tCO₂e in 2027 to around 254.9 EUR/tCO₂e by 2040.

(3.1.1.26) Primary response to risk

Infrastructure, technology and spending

☒ Increase investment in R&D

(3.1.1.27) Cost of response to risk

67952480

(3.1.1.28) Explanation of cost calculation

The total response cost reflects the combined R&D and implementation budgets of three strategic innovation projects developed to mitigate regulatory and transition risks: – SEHRENE Project (~162,000 EUR) – GECO Project (~900,000 EUR) – FLEXIGRID Project (~850,000 EUR) These project budgets include research, engineering, pilot applications, and infrastructure investments aimed at reducing emissions, improving grid flexibility, and increasing energy storage capacity. The average exchange selling rate of 35.54 for 2024 has been used.

(3.1.1.29) Description of response

To proactively address transition risks related to evolving climate regulations, Zorlu Enerji has invested in multiple R&D projects focused on reducing carbon emissions, enhancing energy efficiency, and improving energy system resilience. – The SEHRENE project deploys an Electro-Thermal Energy Storage (ETES) system that captures renewable electricity and excess heat, reusing it during demand peaks. This reduces waste heat emissions and enhances energy security. – The GECO project targets full elimination of CO₂ emissions from geothermal operations through the treatment and recovery of non-condensable gases and the development of reinjection technologies, contributing to 100% green energy output. – The FLEXIGRID project introduces flexible smart grid solutions integrating V2G technology, energy storage systems, and digital platforms in OEDAŞ's distribution infrastructure, enhancing grid resilience and transparency.

Water

(3.1.1.1) Risk identifier

Select from:

☒ Risk2

(3.1.1.3) Risk types and primary environmental risk driver

Acute physical

☒ Drought

(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

☒ Turkey

(3.1.1.7) River basin where the risk occurs

Select all that apply

☒ Tigris & Euphrates

(3.1.1.9) Organization-specific description of risk

Drought conditions pose a serious risk to the operational capacity of Zorlu Enerji's hydroelectric power plants. Prolonged periods of drought reduce water levels in the Tigris & Euphrates river basins, limiting the availability of water needed to generate electricity. This risk is particularly acute in the short-term, as periodic droughts can lead to a sudden and substantial decrease in production capacity. To address this, we have invested in advanced forecasting systems to better predict drought patterns and adjust operations accordingly. Furthermore, we are exploring alternative water sources and storage systems to ensure continuous operation during dry periods. Additionally, drought management strategies are integrated into our broader climate resilience planning, helping us to maintain operational stability and minimize financial losses in the face of water shortages.

(3.1.1.11) Primary financial effect of the risk

Select from:

☒ Disruption in production capacity

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

Select all that apply

☒ Short-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:

☒ Medium-high

(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

In the short-term, drought conditions will lead to an immediate reduction in Zorlu Enerji's hydroelectric power production, decreasing revenue due to lower generation capacity. Prolonged droughts will increase operational costs as the company invests in alternative water sources or storage systems to mitigate the impact on production. Cash flows will be strained by these increased costs and reduced revenues, impacting financial performance. If drought conditions persist, the company may face challenges in meeting its energy delivery commitments, potentially resulting in penalties or loss of market share. This could weaken Zorlu Enerji's financial position, especially in regions where hydroelectric power is a significant component of its energy portfolio.

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

Select from:

☒ Yes

(3.1.1.19) Anticipated financial effect figure in the short-term – minimum (currency)

65775600

(3.1.1.20) Anticipated financial effect figure in the short-term – maximum (currency)

65775600

(3.1.1.25) Explanation of financial effect figure

The financial impact of drought conditions on Zorlu Enerji's hydroelectric power plants is estimated to range from USD 2 million to USD 20 million in the short term. The lower figure represents moderate droughts with temporary reductions in energy generation, while the higher figure reflects severe, prolonged droughts leading to substantial declines in hydroelectric output. Reduced water availability in critical river basins, such as the Tigris & Euphrates, will lead to lower revenue and increased operational costs as the company invests in alternative water sourcing and storage systems. These additional expenses and operational disruptions will strain Zorlu Enerji's cash flows, negatively impacting short-term financial performance.

(3.1.1.26) Primary response to risk

Policies and plans

☒ Increase insurance coverage

(3.1.1.27) Cost of response to risk

98663400

(3.1.1.28) Explanation of cost calculation

The USD 3 million figure reflects the cost of increasing insurance coverage for Zorlu Enerji's hydroelectric assets, which are particularly vulnerable to droughts. This cost includes premium increases and additional insurance policy features.

(3.1.1.29) Description of response

Zorlu Enerji is mitigating the financial risks posed by drought conditions through increased insurance coverage for its hydroelectric plants. This additional coverage protects the company against revenue losses caused by reduced water availability in critical river basins like the Tigris & Euphrates. The insurance policies cover both short-term disruptions in electricity generation and long-term reductions in production capacity due to prolonged droughts. In addition to insurance, Zorlu Enerji is implementing water conservation initiatives to reduce the impact of drought on its operations. This includes investments in water storage systems, advanced drought forecasting technologies, and partnerships with local water authorities to ensure sustainable water use. Together, these measures provide Zorlu Enerji with financial protection while minimizing operational disruptions.

Climate change

(3.1.1.1) Risk identifier

Select from:

☒ Risk3

(3.1.1.3) Risk types and primary environmental risk driver

Chronic physical

- ☒ Increased severity of extreme weather events

(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

- ☒ Turkey

(3.1.1.9) Organization-specific description of risk

Extreme weather events driven by climate change pose significant risks to the existing energy infrastructure. Floods, storms, and extreme heat can increase maintenance costs and lead to service interruptions. Transmission lines and grid infrastructure are particularly vulnerable during such events, potentially resulting in power outages and equipment failures. Additionally, heavy rainfall and temperature fluctuations may cause structural damage to administrative buildings, which can negatively impact business continuity by damaging critical equipment and operational systems.

(3.1.1.11) Primary financial effect of the risk

Select from:

- ☒ Increased indirect [operating] costs

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

Select all that apply

- ☒ Short-term
- ☒ Medium-term
- ☒ Long-term
- ☒ The risk has already had a substantive effect on our organization in the reporting year

(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

(3.1.1.15) Effect of the risk on the financial position, financial performance and cash flows of the organization in the reporting year

The monetary value of lost energy results in a decrease in the Net Sales/Revenue item in the income statement, and the current impact of the risk has been calculated based on this value.

(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

Expected impacts include production losses in hydroelectric power plants (HEPPs), increases in insurance premium costs, and rising maintenance and operational expenses for distribution lines and infrastructure.

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

Select from:

☒ Yes

(3.1.1.18) Financial effect figure in the reporting year (currency)

78823547

(3.1.1.19) Anticipated financial effect figure in the short-term – minimum (currency)

206869986

(3.1.1.20) Anticipated financial effect figure in the short-term – maximum (currency)

206869986

(3.1.1.21) Anticipated financial effect figure in the medium-term – minimum (currency)

130914852

(3.1.1.22) Anticipated financial effect figure in the medium-term – maximum (currency)

130914852

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

131006063

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

131006063

(3.1.1.25) Explanation of financial effect figure

To assess the financial impacts of physical climate risks, we estimated the potential costs associated with climate-related damages and infrastructure renewal needs. For the electricity distribution side, the investment amounts allocated to renewal, maintenance, and infrastructure works aimed at mitigating climate-related risks on distribution lines were identified as climate-related expenditures. For the electricity generation side, revenue losses caused by climate-related events at power plants were estimated based on historical data for 2024 and projected for future years. The projected loss figures were calculated by applying the percentage change of the relevant physical risk over time, as derived from the RCP 4.5 climate scenario trend, as a coefficient to the revenue projections for each future year. The financial materiality threshold was set at 2.1% of the company's consolidated annual revenue to determine which risk-related losses and investments would be considered financially material. This approach enabled us to quantify the expected annual financial impacts of physical climate risks on both the generation and distribution operations.

(3.1.1.26) Primary response to risk

Infrastructure, technology and spending

☒ Improve maintenance of infrastructure

(3.1.1.27) Cost of response to risk

466540001

(3.1.1.28) Explanation of cost calculation

The majority of the total cost (approximately 460,000,000 TL) is attributed to infrastructure investments made by OEDAŞ to enhance the resilience of electricity distribution systems against physical climate risks, such as extreme weather events. These include grid reinforcement, structural upgrades, and preventive maintenance projects to minimize service disruptions. In addition, a total of approximately 7,540,000 TL was allocated to R&D and innovation projects, broken down as follows: KEDEP Project: ~3,000,000 TL SLF Project: ~1,300,000 TL Advanced Grid Development Project: ~300,000 TL Ice Load Mitigation Project: ~470,000 TL Seismic Risk and Emergency Action Planning: ~520,000 TL Energy Storage Systems Project: ~1,530,000 TL Off-grid Infrastructure Development and Pilot: ~420,000 TL These projects aim to improve system flexibility, develop disaster-resilient grid technologies, and enhance operational continuity under physical climate risks.

(3.1.1.29) Description of response

To address the increasing risk of extreme weather events caused by climate change, our organization has implemented a wide range of adaptation and resilience measures, including both infrastructure investments and R&D-driven innovation: Infrastructure enhancements: Through OEDAŞ, we have invested heavily in strengthening electricity distribution infrastructure to withstand physical climate impacts. These include reinforcement of transmission lines, replacement of wooden poles with more durable materials, elevation of critical equipment such as substations, undergrounding of power lines, and installation of backup generators to reduce service interruptions. Energy diversification and decentralization: We are expanding investments in wind, solar, and hybrid renewable energy sources to reduce dependency on centralized systems and improve resilience against localized disruptions. Distributed generation models are being scaled up to increase flexibility. Energy storage and smart grid technologies: Battery storage systems are being integrated to ensure supply continuity during outages caused by weather events. Investments in digital grid modernization and smart grid solutions enable real-time monitoring and adaptive load management, enhancing system flexibility. R&D and pilot projects: KEDEP Project explores chemical energy storage technologies and pilots their application in distribution grids to increase energy efficiency and reduce fault risks. SLF Project develops a spatial load forecasting tool to optimize infrastructure capacity planning. Next-Gen Grid Development Project supports long-term grid planning aligned with emerging clean technologies. Ice Load Mitigation Project focuses on preventing long-duration outages due to ice accumulation on power lines. Earthquake and Disaster Risk Planning Project involves developing a domestic software tool for real-time disaster planning and preparing action plans for high-risk substations. Energy Storage Systems Proj

[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)

0

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

Select from:

☒ Less than 1%

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

78823547

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

Select from:

☒ Less than 1%

(3.1.2.7) Explanation of financial figures

Transition risks: The figure was determined based on the estimated financial impact of identified transition risks, calculated according to their current effect on the company. Physical risks: The figure was determined based on the estimated financial impact of identified physical risks, calculated according to their current effect on the company.

Water

(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)

0

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

Select from:

☒ Less than 1%

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

3124341000

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

Select from:

☒ 1-10%

(3.1.2.7) Explanation of financial figures

Extremum points (maximum figures) or sum of extremum points are used to provide the amounts of financial metric vulnerable to transition or physical risks. These amounts are then divided into our revenue figure reported in Module 1 to find the % of total financial metric vulnerable to transition and physical risks.

[Add row]

(3.2) Within each river basin, how many facilities are exposed to substantive effects of water-related risks, and what percentage of your total number of facilities does this represent?

Row 1

(3.2.1) Country/Area & River basin

Turkey

☒ Other, please specify :Gediz Basin

(3.2.2) Value chain stages where facilities at risk have been identified in this river basin

Select all that apply

☒ Direct operations

(3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin

1

(3.2.4) % of your organization's total facilities within direct operations exposed to water-related risk in this river basin

Select from:

☒ 1-25%

(3.2.8) % organization's annual electricity generation that could be affected by these facilities

Select from:

☒ 1-25%

(3.2.10) % organization's total global revenue that could be affected

Select from:

☒ 1-10%

(3.2.11) Please explain

Alaşehir Geothermal Energy Power Plant is assessed as per electricity generation.

Row 2

(3.2.1) Country/Area & River basin

Saudi Arabia

☒ Tigris & Euphrates

(3.2.2) Value chain stages where facilities at risk have been identified in this river basin

Select all that apply

☒ Direct operations

(3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin

2

(3.2.4) % of your organization's total facilities within direct operations exposed to water-related risk in this river basin

Select from:

☒ 100%

(3.2.8) % organization's annual electricity generation that could be affected by these facilities

Select from:

☒ 1-25%

(3.2.10) % organization's total global revenue that could be affected

Select from:

☒ 1-10%

(3.2.11) Please explain

Erzurum Tercan & Tunceli Mercan HPPs are assessed in terms of their installed capacities and their contributions to our annual net electricity generation.

[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

Zorlu Enerji's Hydroelectric Power Plants, which are the only eligible assets for potential water-related fines, penalties, or enforcement orders, have not experienced any incidents that would result in such regulatory actions during the 2024 reporting year. We adhere to strict compliance with all water-related environmental regulations and continuously monitor operations to mitigate any risks. Our commitment to maintaining environmental standards ensures that we remain fully compliant with all water management laws and regulations.

[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 has been reporting stationary combustion emissions since 2015, reflecting our proactive approach to environmental responsibility. With Turkey's ratification of the Paris Agreement and the implementation of the European Green Deal, we anticipate significant regulatory shifts soon. The development of the Climate Law Framework and Emissions Trading System (ETS), both part of the World Bank-funded Market Readiness Project, will likely be enacted within the next two years, accelerating Turkey's decarbonization efforts. As a vertically integrated energy company with operations across electricity generation, transmission, distribution, and trading, Zorlu Enerji is well-positioned to navigate these regulatory changes. Our diversified portfolio, including renewable energy sources like geothermal, wind, and hydro, alongside traditional natural gas plants, enables us to address the risks and opportunities posed by the ETS with a holistic strategy. The ETS could impose additional costs on carbon-intensive operations, but our leadership in renewable energy prepares us to absorb and mitigate such impacts. To align with our decarbonization strategy, Zorlu Enerji has implemented an internal carbon pricing mechanism. This system allocates costs based on Scope 1 and 2 emissions and upstream Scope 3 emissions for each power plant. It allows us to forecast potential financial impacts, enabling us to simulate ETS effects and incentivize carbon-intensive plants to adopt energy efficiency measures. The revenue generated through our internal carbon pricing is reinvested into energy efficiency initiatives, R&D, and expanding our renewable energy capacity. This approach ensures that carbon-intensive operations are gradually decarbonized, while

supporting our goal to lead the energy transition. The internal financial burden on higher-emission plants encourages faster adoption of clean energy technologies, increasing their efficiency and reducing their dependence on fossil fuels. As a major player in Turkey's energy sector, Zorlu Enerji is aware of the broader industry implications of an ETS. The energy sector is a significant source of national greenhouse gas emissions, and carbon pricing will place considerable compliance obligations on energy producers. For us, the ETS represents both a challenge and an opportunity. While it will increase operational costs for natural gas and thermal plants, it will also improve the competitiveness of renewables, a key advantage for Zorlu Enerji as we continue expanding our renewable portfolio. ETS adoption will likely lead to higher electricity prices across the sector. However, Zorlu Enerji is well-positioned to benefit from this shift as we continue to grow our investments in renewables and smart energy systems, including electric vehicle (EV) charging infrastructure. As the market increasingly favors low-carbon technologies, our leadership in geothermal, wind, and hydroelectric power generation will strengthen our competitive edge, enabling us to capture more market share and meet the rising demand for clean energy. In preparation for regulatory changes, our internal carbon pricing mechanism serves as a vital tool to align our operations with potential external carbon pricing systems. This system allows us to predict financial impacts on our assets, ensuring that we remain resilient amid market shifts. Moreover, it supports our commitment to achieving our 2040 Net Zero target, incentivizing energy efficiency and carbon reduction across our portfolio. Zorlu Enerji is committed to supporting Turkey's national climate goals and will continue collaborating with policymakers, regulators, and industry partners to ensure a smooth and effective transition to a low-carbon economy. Our strategy for complying with future carbon pricing regulations is built on innovation, sustainability, and operational excellence, ensuring we remain at the forefront of Turkey's energy transition. Through strategic investments in renewable energy, technology, and energy efficiency, we aim to continue leading the decarbonization of Turkey's energy sector, delivering long-term value to our stakeholders.

(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?

	Environmental opportunities identified
Climate change	Select from: <input checked="" type="checkbox"/> Yes, we have identified opportunities, and some/all are being realized
Water	Select from: <input checked="" type="checkbox"/> Yes, we have identified opportunities, and some/all are being realized

[Fixed row]

(3.6.1) Provide details of the environmental opportunities 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

(3.6.1.1) Opportunity identifier

Select from:

☒ Opp3

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Energy source

☒ Use of low-carbon energy sources

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☒ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☒ Turkey

(3.6.1.8) Organization specific description

Accelerating the coal phase-out can reduce the company's carbon footprint and reinforce its environmental responsibility.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☒ Reduced indirect (operating) costs

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

Select all that apply

☒ Medium-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☒ Virtually certain (99–100%)

(3.6.1.12) Magnitude

Select from:

☒ Medium

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

Accelerating the coal phase-out is expected to strengthen the company's financial position by reducing exposure to carbon pricing and regulatory compliance costs. Financial performance will improve through reduced fuel and operating expenses, while long-term cash flows are anticipated to become more stable and predictable due to a lower carbon footprint and alignment with sustainability targets.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☒ No

(3.6.1.26) Strategy to realize opportunity

Coal use is targeted to be reduced by prioritizing low-carbon suppliers. Emissions are being reduced through solar power investments and energy efficiency projects. To decrease fossil fuel use, the transition to an electric fleet and the use of railway transportation are being increased. Low-emission energy is provided in electricity trading through the collaboration with Zes Solar.

Water

(3.6.1.1) Opportunity identifier

Select from:

☒ Opp2

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Products and services

- ☒ Increased sales of existing products and services

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

- ☒ Downstream value chain

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

- ☒ Turkey

(3.6.1.6) River basin where the opportunity occurs

Select all that apply

- ☒ Tigris & Euphrates

(3.6.1.8) Organization specific description

Zorlu Energy derives 100% of its electricity generation from renewable resources such as geothermal, hydro, and wind power plants. This renewable focus aligns with growing public awareness surrounding climate change and the rising consumer demand for low-carbon energy solutions. By providing services and products based on green energy, Zorlu Energy enjoys a competitive advantage, particularly among B2C companies striving for sustainability. Our strong commitment to environmental responsibility and a sustainable corporate approach enhances Zorlu's reputation among stakeholders, especially investors and customers. As regulations tighten and companies seek ways to offset their carbon emissions, the demand for I-REC Certification has grown substantially. Zorlu Energy is well-positioned to capitalize on this trend by offering certification and income from carbon credits. By doing so, we can create new revenue streams while continuing to lead in the renewable energy sector. This opportunity not only increases the demand for our clean energy products but also strengthens our leadership in the transition to a low-carbon economy.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

- ☒ Increased revenues resulting from increased demand for products and services

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

Select all that apply

- ☒ Short-term
- ☒ Long-term
- ☒ The opportunity has already had a substantive effect on our organization in the reporting year

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

- ☒ Likely (66–100%)

(3.6.1.12) Magnitude

Select from:

- ☒ Low

(3.6.1.13) Effect of the opportunity on the financial position, financial performance and cash flows of the organization in the reporting period

As of today, increased sales of existing products and services driven by the growing demand for renewable energy have already had a substantial positive effect on Zorlu Enerji's revenue generation and overall financial performance. With heightened awareness of climate change and sustainability, businesses and consumers are actively shifting towards eco-friendly products, which has significantly boosted the sales of our renewable energy services. This shift has translated into increased revenues and cash inflows, improving our financial stability. Additionally, our strengthened market presence and enhanced brand reputation, closely tied to our sustainability initiatives, have further contributed to these financial gains. In summary, this opportunity has improved our financial performance by creating new revenue streams and solidifying customer loyalty.

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

In the short-term, increased sales of existing products and services driven by the growing demand for renewable energy is anticipated to have a substantial positive effect on Zorlu Enerji's revenue generation and overall financial performance. With heightened awareness of climate change and sustainability, businesses and consumers are shifting towards eco-friendly products, boosting the sales of our renewable energy services. This trend will likely translate into increased revenues and cash inflows, improving financial stability. Additionally, a stronger market presence and brand reputation associated with sustainability initiatives will further drive financial gains. In summary, this opportunity will enhance our financial performance by creating new revenue streams and strengthening customer loyalty.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☒ Yes

(3.6.1.16) Financial effect figure in the reporting year (currency)

10112933

(3.6.1.17) Anticipated financial effect figure in the short-term - minimum (currency)

32887800

(3.6.1.18) Anticipated financial effect figure in the short-term – maximum (currency)

98663400

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

638244103

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

638244103

(3.6.1.23) Explanation of financial effect figures

In 2024, I-REC revenues reached 403.404 USD: a total of 1,041 GWh of electricity was certified from Kızıldere 3 GPP and Alaşehir GPP, generating a total income of 458.251 USD from these certificates. In 2023, we conducted a detailed financial quantification study regarding water-related risks and opportunities, where short-term and long-term financial effects were estimated. As there has been no significant change in assumptions or methodology during the reporting year, we have maintained the same figures in 2024 reporting. Therefore, the financial effect figures disclosed for this issue in 2024 are based on the quantifications provided in our 2023 CDP response. The financial impact estimate of 1 million to 3 million USD in short-term is based on the expected rise in demand for Zorlu Enerji's renewable energy products and services. This includes increased sales of I-REC certificates from renewable assets, driven by corporations and households seeking green energy options to meet sustainability goals. The range reflects the potential market share expansion within the medium term, considering both established and growing customer bases. Additionally, the figures include revenue growth from B2C companies that are increasingly adopting renewable energy sources. In addition to this, in the long-term we plan to sell carbon credits corresponding to 882,000 tonnes of CO2 reduction from our existing and planned facilities. When we assume a carbon credit price of 22 USD for 2030, the expected revenue will be 19,404,000 USD.

(3.6.1.24) Cost to realize opportunity

6577560

(3.6.1.25) Explanation of cost calculation

The cost includes infrastructure and logistical investments to increase Zorlu Enerji's renewable energy offerings, such as expanding the generation and certification of green energy. Additionally, expenses related to acquiring the necessary expertise and certifications (like I-REC and YEK-G) and covering consultant fees are included. As demand for decarbonized energy grows, Zorlu Enerji must consistently meet these standards, which is why a significant budget is allocated to cover the administrative and operational costs of maintaining the certifications.

(3.6.1.26) Strategy to realize opportunity

Zorlu Enerji will leverage its strong position in the renewable energy market by targeting B2C companies, which are increasingly focusing on reducing their carbon footprints. We plan to continue expanding our renewable energy capacity, particularly focusing on solar and wind power projects. Our strategy includes offering bundled services that combine energy solutions with I-REC certified energy, thus catering to businesses aiming to meet their sustainability goals. By maintaining compliance with the latest global sustainability trends, we will secure long-term contracts with customers who prioritize renewable energy, improving our market share and bolstering revenue streams.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☒ Opp1

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Resilience

☒ Increased resilience to impacts of climate change

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☒ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☒ Turkey

(3.6.1.8) Organization specific description

Developing climate change adaptation strategies can enhance the company's operational resilience and ensure long-term business continuity. Strengthening energy infrastructure against climate change risks can improve service continuity and reduce maintenance costs.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☒ Reduced indirect (operating) costs

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

Select all that apply

☒ Medium-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☒ Virtually certain (99–100%)

(3.6.1.12) Magnitude

Select from:

☒ Medium-low

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

By strengthening energy infrastructure against climate change risks, the company is expected to improve service continuity and reduce maintenance costs. This will support financial performance through lower operating expenses, enhance financial position by safeguarding assets, and provide more stable cash flows in the long term.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☒ No

(3.6.1.24) Cost to realize opportunity

64000000

(3.6.1.25) Explanation of cost calculation

The cost calculations were based on the infrastructure investments made by OEDAŞ.

(3.6.1.26) Strategy to realize opportunity

Preventive measures against climate change are implemented through risk assessments conducted at power plants. Energy efficiency projects are carried out at facilities to optimize maintenance processes. The transition to climate-friendly energy sources is accelerated through solar, wind, and hydro power projects. SCADA and AMR systems enable rapid response to power outages and provide emission reductions. Energy supply security is enhanced through geothermal water management and energy storage systems.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☒ Opp2

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Energy source

☒ Use of low-carbon energy sources

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☒ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☒ Turkey

(3.6.1.8) Organization specific description

By increasing investments in low-carbon technologies, Zorlu Enerji can improve its environmental performance and gain a competitive advantage through reducing carbon emissions and ensuring regulatory compliance, while also enhancing its long-term sustainability and creating new revenue streams by benefiting from incentives for renewable energy investments.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☒ Returns on investment in low-emission technology

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

Select all that apply

☒ Medium-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☒ Likely (66–100%)

(3.6.1.12) Magnitude

Select from:

☒ High

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

By benefiting from incentives for renewable energy investments, the company is expected to enhance its long-term sustainability and strengthen cash flows. In addition, by reducing carbon emissions and ensuring compliance with regulations, the company can improve its environmental performance, gain a competitive advantage, and positively impact its overall financial performance.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☒ No

(3.6.1.24) Cost to realize opportunity

1912000

(3.6.1.25) Explanation of cost calculation

To enable the realization of this opportunity, we have made significant investments. The total response cost reflects the combined R&D and implementation budgets of three strategic innovation projects developed to mitigate regulatory and transition risks: – SEHRENE Project (~162,000 EUR) – GECO Project (~900,000 EUR) – FLEXIGRID Project (~850,000 EUR) These project budgets cover research, engineering, pilot applications, and infrastructure investments aimed at reducing emissions, improving grid flexibility, and increasing energy storage capacity.

(3.6.1.26) Strategy to realize opportunity

With the GECO Project, carbon capture technology is being evaluated in geothermal power plants. Clean energy production is being expanded through solar (PV), wind, and hydroelectric power investments. Energy consumption is being optimized in power plants through modernization projects and ESP pumps. The use of low-carbon energy is being certified with YEK-G and I-REC certificates. Financial sustainability is ensured through carbon credits and long-term green power purchase agreements (PPAs). The SEHRENE project deploys an Electro-Thermal Energy Storage (ETES) system that captures renewable electricity and excess heat, reusing it during demand peaks. This reduces waste heat emissions and enhances energy security. The GECO project targets full elimination of CO₂ emissions from geothermal operations through the treatment and recovery of non-condensable gases and the development of reinjection technologies, contributing to 100% green energy output. –The FLEXIGRID project introduces flexible smart grid solutions integrating V2G technology, energy storage systems, and digital platforms in OEDAŞ's distribution infrastructure, enhancing grid resilience and transparency.

[Add row]

(3.6.2) Provide the amount and proportion of your financial metrics in the reporting year that are aligned with the substantive effects of environmental opportunities.

Climate change

(3.6.2.1) Financial metric

Select from:

☒ Revenue

(3.6.2.2) Amount of financial metric aligned with opportunities for this environmental issue (unit currency as selected in 1.2)

19759965000000

(3.6.2.3) % of total financial metric aligned with opportunities for this environmental issue

Select from:

☒ 61-70%

(3.6.2.4) Explanation of financial figures

To assess the alignment of revenue with the identified opportunities, we use a metric that calculates the share of Zorlu Enerji's revenues generated from sustainable business models. The definition of "sustainable business model" is based on the framework provided by S&P, particularly within the Corporate Sustainability Assessment (CSA). In this context, the metric "Net Sales from Sustainable Activities" is applied, which measures the proportion of total revenues derived from environmentally and socially sustainable products and services. For the calculation, revenues from activities such as renewable energy generation (solar, wind, hydro, geothermal), certified green energy sales (YEK-G, I-REC), carbon credits, and long-term green power purchase agreements (PPAs) are considered sustainable revenues. These figures are compared against total revenues, thereby quantifying the contribution of sustainable business models to overall income. The results of this calculation are regularly reported and monitored to ensure transparency and to demonstrate the company's progress in transitioning toward sustainable value creation.

Water

(3.6.2.1) Financial metric

Select from:

☒ Revenue

(3.6.2.2) Amount of financial metric aligned with opportunities for this environmental issue (unit currency as selected in 1.2)

638041000

(3.6.2.3) % of total financial metric aligned with opportunities for this environmental issue

Select from:

☒ 1-10%

(3.6.2.4) Explanation of financial figures

Extremum points (maximum figures) or sum of extremum points are used to provide the amounts of financial metric aligned with opportunities. These amounts are then divided into our revenue figure reported in Module 1 to find the % of total financial metric aligned with these opportunities.

[Add 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.

[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: <input checked="" type="checkbox"/> Yes
Water	Select from: <input checked="" type="checkbox"/> Yes
Biodiversity	Select from: <input checked="" type="checkbox"/> 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

- ☒ Board chair
- ☒ Chief Executive Officer (CEO)

- ☒ Chief Financial Officer (CFO)
- ☒ 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 some board meetings – at least annually

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

Select all that apply

- | | |
|--|---|
| <input checked="" type="checkbox"/> Reviewing and guiding annual budgets | <input checked="" type="checkbox"/> Overseeing and guiding public policy engagement |
| <input checked="" type="checkbox"/> Overseeing and guiding scenario analysis | <input checked="" type="checkbox"/> Approving and/or overseeing employee incentives |
| <input checked="" type="checkbox"/> Overseeing the setting of corporate targets | <input checked="" type="checkbox"/> Overseeing and guiding major capital expenditures |
| <input checked="" type="checkbox"/> Monitoring progress towards corporate targets | <input checked="" type="checkbox"/> Monitoring the implementation of the business strategy |
| <input checked="" type="checkbox"/> Approving corporate policies and/or commitments | <input checked="" type="checkbox"/> Overseeing reporting, audit, and verification processes |
| <input checked="" type="checkbox"/> Monitoring the implementation of a climate transition plan | |
| <input checked="" type="checkbox"/> Overseeing and guiding the development of a business strategy | |
| <input checked="" type="checkbox"/> Overseeing and guiding acquisitions, mergers, and divestitures | |
| <input checked="" type="checkbox"/> Monitoring supplier compliance with organizational requirements | |
| <input checked="" type="checkbox"/> Monitoring compliance with corporate policies and/or commitments | |
| <input checked="" type="checkbox"/> Overseeing and guiding the development of a climate transition plan | |
| <input checked="" type="checkbox"/> 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.

Water

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

Select all that apply

- ☒ Board chair
- ☒ Chief Executive Officer (CEO)
- ☒ Chief Financial Officer (CFO)
- ☒ 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 some board meetings – at least annually

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

Select all that apply

- | | |
|--|--|
| <input checked="" type="checkbox"/> Reviewing and guiding annual budgets | <input checked="" type="checkbox"/> Overseeing and guiding public policy engagement |
| <input checked="" type="checkbox"/> Overseeing and guiding scenario analysis | <input checked="" type="checkbox"/> Reviewing and guiding innovation/R&D priorities |
| <input checked="" type="checkbox"/> Overseeing the setting of corporate targets | <input checked="" type="checkbox"/> Approving and/or overseeing employee incentives |
| <input checked="" type="checkbox"/> Monitoring progress towards corporate targets | <input checked="" type="checkbox"/> Overseeing and guiding major capital expenditures |
| <input checked="" type="checkbox"/> Approving corporate policies and/or commitments | <input checked="" type="checkbox"/> Monitoring the implementation of the business strategy |
| <input checked="" type="checkbox"/> Overseeing reporting, audit, and verification processes | |
| <input checked="" type="checkbox"/> Monitoring the implementation of a climate transition plan | |
| <input checked="" type="checkbox"/> Overseeing and guiding the development of a business strategy | |
| <input checked="" type="checkbox"/> Overseeing and guiding acquisitions, mergers, and divestitures | |
| <input checked="" type="checkbox"/> Monitoring compliance with corporate policies and/or commitments | |
| <input checked="" type="checkbox"/> Overseeing and guiding the development of a climate transition plan | |
| <input checked="" type="checkbox"/> 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 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

- ☒ Board chair
- ☒ Chief Executive Officer (CEO)
- ☒ Chief Financial Officer (CFO)
- ☒ 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 some board meetings – at least annually

(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 public policy engagement
- ☒ Overseeing and guiding scenario analysis
- ☒ Reviewing and guiding innovation/R&D priorities

- ☒ Overseeing the setting of corporate targets
- ☒ Monitoring progress towards corporate targets
- ☒ Approving corporate policies and/or commitments
- ☒ 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 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 and/or overseeing employee incentives
- ☒ Overseeing and guiding major capital expenditures
- ☒ Monitoring the implementation of the business strategy

(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

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: <input checked="" type="checkbox"/> Yes
Water	Select from: <input checked="" type="checkbox"/> Yes
Biodiversity	Select from: <input checked="" type="checkbox"/> 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

Committee

- ☑ Sustainability committee

(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:

- ☒ Annually

(4.3.1.6) Please explain

Sustainability Committee is newly developed in 2024 under the reporting line of Board of Directors. The Sustainability Committee includes an independent board member (acts as a committee president) and the sector president. It meets annually to evaluate the company's performance, budget needs, risks, opportunities, and developments regarding ESG, climate, water, and biodiversity, and shapes the company's strategy accordingly.

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:

- ☒ Annually

(4.3.1.6) Please explain

Sustainability Committee is newly developed in 2024 under the reporting line of Board of Directors. The Sustainability Committee includes an independent board member (acts as a committee president) and the sector president. It meets annually to evaluate the company's performance, budget needs, risks, opportunities, and developments regarding ESG, climate, water, and biodiversity, and shapes the company's strategy accordingly. The CEO is also a member of the committee and holds the ultimate authority, as final approvals are granted by the CEO. Therefore, the highest level of oversight is ensured both through the CEO and the Sustainability Committee.

Biodiversity

(4.3.1.1) Position of individual or committee with responsibility

Committee

- ☒ Sustainability committee

(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:

- ☒ Annually

(4.3.1.6) Please explain

Sustainability Committee is newly developed in 2024 under the reporting line of Board of Directors. The Sustainability Committee includes an independent board member (acts as a committee president) and the sector president. It meets annually to evaluate the company's performance, budget needs, risks, opportunities, and developments regarding ESG, climate, water, and biodiversity, and shapes the company's strategy accordingly.

[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

ESG targets are integrated into the scorecards of our senior management and these include water management. Our approach ensures that sustainability and growth criteria are owned at the management level. Performance indicators are regularly monitored and embedded into the individual evaluation processes of executives. To align our remuneration system with these evaluations, we encourage leaders to actively contribute to company-wide sustainability goals. Zorlu Enerji defines SMART targets and KPIs for senior management and their respective departments, enabling systematic tracking of progress. In addition to fixed salaries, senior executives participate in a short-term variable incentive plan, of which 90% is linked to ESG related KPIs and 10% to financial KPIs. The ESG-linked portion of the incentive plan includes Carbon emissions reduction (Scopes 1, 2, 3) 50%, Sustainability index scores: 20%, Employee retention and engagement 20%.

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

50

(4.5.3) Please explain

*ESG targets are integrated into the scorecards of our senior management and these include water management. Our approach ensures that sustainability and growth criteria are owned at the management level. Performance indicators are regularly monitored and embedded into the individual evaluation processes of executives. To align our remuneration system with these evaluations, we encourage leaders to actively contribute to company-wide sustainability goals. Zorlu Enerji defines SMART targets and KPIs for senior management and their respective departments, enabling systematic tracking of progress. In addition to fixed salaries, senior executives participate in a short-term variable incentive plan, of which 90% is linked to ESG related KPIs and 10% to financial KPIs. The ESG-linked portion of the incentive plan includes Carbon emissions reduction (Scopes 1, 2, 3) 50%, Sustainability index scores: 20%, Employee retention and engagement 20%.
[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 Financial Officer (CFO)

(4.5.1.2) Incentives

Select all that apply

☒ Bonus - % of salary

☒ Bonus – set figure

☒ Promotion

☒ Salary increase

(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
- ☒ Other targets-related metrics, please specify :ESG performance levels in rating scores

Strategy and financial planning

- ☒ Board approval of climate transition plan
- ☒ Achievement of climate transition plan

Emission reduction

- ☒ Reduction in emissions intensity
- ☒ Increased share of renewable energy in total energy consumption
- ☒ 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
- ☒ Energy efficiency improvement
- ☒ Reduction in total energy consumption

Engagement

- ☒ Increased engagement with suppliers on environmental issues

(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

Zorlu Enerji's C-level positions and the organizations reporting to them are included in the performance evaluation system related to climate, primarily covering ESG rating scores, emission reductions, water usage rates, and renewable energy consumption. Successful performance is prized by short-term (annual) and long term (more than annual) monetary incentives for c-levels, sustainability team and other organizations who directly involved is related achievements.

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

The incentives associated with our positions are strategically designed to align with and support the achievement of our environmental commitments and climate transition plan. By incorporating sustainability metrics into performance evaluations, we ensure that all team members, particularly in leadership roles, are held accountable for their contributions to our environmental goals. For instance, executives have specific targets related to emissions reductions, renewable energy usage, and water conservation integrated into their incentive structures. This approach not only motivates them to prioritize sustainable practices but also fosters a culture of accountability across the organization. Furthermore, regular training and development opportunities are provided to enhance understanding of climate issues and innovative solutions. This empowers our teams to actively engage in initiatives that drive our climate transition, ensuring that every employee feels a sense of ownership in our sustainability journey. Ultimately, by aligning incentives with our environmental commitments, we create a robust framework that drives meaningful action and measurable progress towards our climate objectives, reinforcing our dedication to a sustainable future.

Water

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☒ Board/Executive board

(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

(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

Zorlu Enerji's C-level positions and the organizations reporting to them are included in the performance evaluation system related to climate, primarily covering ESG rating scores, emission reductions, water usage rates, and renewable energy consumption. Successful performance is prized by short-term (annual) and long term (more than annual) monetary incentives for c-levels, sustainability team and other organizations who directly involved is related achievements.

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

The incentives associated with our positions are strategically designed to align with and support the achievement of our environmental commitments and climate transition plan. By incorporating sustainability metrics into performance evaluations, we ensure that all team members, particularly in leadership roles, are held accountable for their contributions to our environmental goals. For instance, executives have specific targets related to emissions reductions, renewable energy usage, and water conservation integrated into their incentive structures. This approach not only motivates them to prioritize sustainable practices but also fosters a culture of accountability across the organization. Furthermore, regular training and development opportunities are provided to enhance understanding of climate issues and innovative solutions. This empowers our teams to actively engage in initiatives that drive our climate transition, ensuring that every employee feels a sense of ownership in our sustainability journey. Ultimately, by aligning incentives with our environmental commitments, we create a robust framework that drives meaningful action and measurable progress towards our climate objectives, reinforcing our dedication to a sustainable future.

[Add row]

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

	Does your organization have any environmental policies?
	Select from: <input checked="" type="checkbox"/> 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
- ☒ Water
- ☒ 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
- ☒ Downstream value chain

(4.6.1.4) Explain the coverage

Zorlu Enerji developed a comprehensive environmental policy, applicable to all Zorlu Enerji employees, all operations, suppliers, and key business partners. Focus on stated environmental aspects; - Biodiversity - Water management - Environmental and social impacts - Preventing pollution - Resource efficiency - Regulatory compliance - Training and awareness raising - New investments and continuous improvement - Transparency in sustainability reporting - Net-zero emissions and renewable energy - Climate resilience and infrastructure development - Supply chain and procurement management

(4.6.1.5) Environmental policy content

Environmental commitments

- ☒ Commitment to No Net Loss
- ☒ Commitment to Net Positive Gain
- ☒ Commitment to a circular economy strategy

- ☑ Commitment to no trade of CITES listed species
- ☑ 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
- ☑ Commitment to engage in integrated, multi-stakeholder landscape (including river basin) initiatives to promote shared sustainability goals

Climate-specific commitments

- ☑ Commitment to 100% renewable energy
- ☑ Commitment to net-zero emissions
- ☑ Commitment to not invest in fossil-fuel expansion
- ☑ Commitment to not funding climate-denial or lobbying against climate regulations

Water-specific commitments

- | | |
|--|--|
| ☑ Commitment to reduce water consumption volumes | ☑ Commitment to the conservation of freshwater ecosystems |
| ☑ Commitment to reduce water withdrawal volumes | ☑ Commitment to water stewardship and/or collective action |
| ☑ Commitment to reduce or phase out hazardous substances | |
| ☑ Commitment to control/reduce/eliminate water pollution | |
| ☑ Commitment to safely managed WASH in local communities | |

Social commitments

- ☑ Commitment to respect internationally recognized human rights
- ☑ Adoption of the UN International Labour Organization principles
- ☑ Commitment to promote gender equality and women's empowerment
- ☑ Commitment to secure Free, Prior, and Informed Consent (FPIC) of indigenous people and local communities
- ☑ Commitment to respect and protect the customary rights to land, resources, and territory of Indigenous Peoples and Local Communities
- ☑ Other social commitment, please specify

Additional references/Descriptions

- ☑ Recognition of environmental linkages and trade-offs

- ☒ Description of environmental requirements for procurement
- ☒ Description of biodiversity-related performance standards
- ☒ Description of impacts on natural resources and ecosystems
- ☒ Acknowledgement of the human right to water and sanitation
- ☒ Description of renewable electricity procurement practices
- ☒ Reference to timebound environmental milestones and targets
- ☒ Description of dependencies on natural resources and ecosystems
- ☒ Description of membership and financial support provided to organizations that seek to influence public policy
- ☒ Description of grievance/whistleblower mechanism to monitor non-compliance with the environmental policy and raise/address/escalate any other greenwashing concerns

(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 Sustainable Development Goal 6 on Clean Water and Sanitation
- ☒ Yes, in line with another global environmental treaty or policy goal, please specify :SBTi, UNGlobal Compact

(4.6.1.7) Public availability

Select from:

- ☒ Publicly available

[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

- ☒ Global Reporting Initiative (GRI) Community Member
- ☒ Science-Based Targets Initiative (SBTi)
- ☒ Task Force on Climate-related Financial Disclosures (TCFD)
- ☒ UN Global Compact
- ☒ World Business Council for Sustainable Development (WBCSD)

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

As a member of the UN Global Compact (UNGC), Zorlu Enerji integrates the 10 Principles into its corporate sustainability strategy and actively contributes to advancing the global sustainability agenda through participation in UNGC projects and programs. In line with the Science-Based Targets initiative (SBTi), Zorlu Enerji's near-term and long-term emission reduction targets have been validated and approved by SBTi, demonstrating the company's alignment with the Paris Agreement and global climate action. At the CEO level, the Sector President represents the company on the WBCSD Board of Directors, while the Sustainability Team leads WBCSD projects, contributing both technical expertise and sectoral insights. As a member of TÜSİAD, Zorlu Enerji actively participates in the TÜSİAD Energy Working Group and the TÜSİAD Environment and Climate Change Working Group, where it provides technical input and policy recommendations on climate and energy issues to help shape national sustainability policies and strategies.

[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

Select all that apply

- ☒ 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
- ☒ Sustainable Development Goal 6 on Clean Water and Sanitation
- ☒ Another global environmental treaty or policy goal, please specify

(4.11.4) Attach commitment or position statement

737f6029-6254-450e-aa5f-40ccd5b480da.pdf

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

Select from:

- ☒ No

(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

Our organization has established a structured process to ensure that external engagement activities align with our environmental commitments and transition plan. Alignment with Commitments: Before initiating any activity, the Sustainability Committee conducts a review to confirm consistency with our “Akıllı Hayat 2030” strategy, the ISO 14064-1 verified GHG inventory, and SBTi-approved Net Zero targets for 2030 and 2040. This ensures all actions support emissions reduction, resource conservation, and community impact goals. Stakeholder Engagement: We engage with local communities, industry partners, NGOs, and governmental bodies. Our 2024 Integrated Report highlighted renewable energy shares (92% in Türkiye, 70% globally) and disclosed water consumption and recycling practices, particularly in high-stress regions, aligning engagement with our transition goals. Continuous Monitoring and Reporting: All engagements are evaluated annually and disclosed through the Integrated Report. Key indicators (renewable generation share, ISO 14064-1 verified GHG emissions, water consumption in high-stress regions) are monitored and approved by the Sustainability Committee to ensure compliance with commitments. Training and Awareness: Employees involved in external engagement receive regular training on our sustainability strategy and SBTi-approved targets, ensuring they can accurately represent company commitments. By following this process—anchored in committee oversight, recognized frameworks, annual reporting, and internal training—we ensure that external engagements both uphold environmental commitments and deliver measurable progress towards our Net Zero targets.

[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

Renewable Energy Law (Law No. 5346) Climate Law (draft version) Green Taxonomy Legislation (draft version) Green Deal and Carbon Pricing & Local Carbon Pricing Legislation (draft version) Environmental Impact Assessment (EIA) Regulations

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

Select all that apply

- ☒ Climate change
- ☒ Water

(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
- ☒ Carbon taxes
- ☒ 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:

☒ Neutral

(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

☒ Participation in voluntary government programs

☒ 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

Zorlu Enerji actively engaged with policymakers on environmental policies and regulations during the reporting year to support its sustainability strategy and 2040 SBTi net-zero target. Key engagements included: Renewable Energy Law (Law No. 5346): Provided input to the Ministry of Energy and industry associations on streamlining licensing, grid capacity, and incentives (e.g., YEKA, hybrid storage). Objective: accelerate renewable investments and reduce carbon intensity. KPI: Renewable installed capacity (MW), renewable share in production (%). Climate Law (Draft): Shared views with the Ministry of Environment on ETS and carbon pricing to ensure a fair, feasible transition. Objective: align with national emission reduction goals and access green finance. KPI: Potential carbon costs, low-carbon technology investments. Green Taxonomy (Draft): Contributed technical feedback to ministries on classification of geothermal, wind, solar, and efficiency activities. Objective: secure transparent taxonomy enabling access to green bonds and loans. KPI: Green financing ratio, green bond issuance volume. Green Deal & Carbon Pricing: Engaged with ministries/associations on CBAM and local carbon pricing to ensure competitiveness and fair transition. Objective: align Turkey with EU Green Deal while incentivizing emission reduction. KPI: Potential carbon costs, carbon intensity reduction (%). EIA Regulations (Draft): Commented on revisions to accelerate renewable project approvals while safeguarding environmental integrity. Through these engagements, Zorlu Enerji contributed to shaping a regulatory landscape that supports renewable energy growth, facilitates green finance, and strengthens alignment with national and international climate frameworks, directly reinforcing its 2040 net-zero pathway.

(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

☒ Sustainable Development Goal 6 on Clean Water and Sanitation

[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 :Türkiye Odalar ve Borsalar Birliği Enerji Meclisi – Union of Chambers and Commodity Exchanges of Türkiye Energy Assembly

(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

We participate in sectoral meetings and events organized by the TOBB Energy Assembly and hold voting rights in its general assembly. The Assembly's efforts to develop energy sector policies align with our approach to energy transition, and we contribute by sharing sectoral insights during these meetings.

(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 (İş Dünyası ve Sürdürülebilir Kalkınma Derneği) – Business and Sustainable Development Council Turkey

(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

We contribute to SKD Türkiye's Renewhub project under the Renewable Energy Working Group and support the Young Impact Program to encourage innovative sustainability solutions from future leaders. SKD Türkiye's position on renewable energy and sustainable development aligns with ours, and we actively participated in events and webinars to help strengthen their position and accelerate sector-wide adoption.

(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 provided represents annual membership fees paid to the organization. The aim of this funding is to support the organization's general operations, including its working groups, stakeholder meetings, and awareness-raising activities related to [climate change / water / energy efficiency etc.]. These fees enable the organization to carry out research, organize events, and publish reports that can indirectly inform and shape policies, laws, or regulations relevant to environmental issues. The amount reported reflects the actual annual membership fee as invoiced by the organization.

(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 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 :TÜSİAD (Türk Sanayicileri ve İş İnsanları Derneği) – 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
☒ 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

We actively participate in TÜSİAD's Energy Working Group and Environment & Net Zero Policies Working Group. These groups advocate for the implementation of comprehensive MRV (monitoring, reporting, and verification) regulations on GHG emissions, which are fully aligned with our company's net-zero targets. During the reporting year, we contributed by sharing data, insights, and best practices to support the development of these policy recommendations.

(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

☒ 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 (Türkiye Rüzgar Enerjisi Birliği) – 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

(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

We follow scientific, technical, and applied studies on wind energy through our membership in TÜREB, and participate in activities aimed at expanding the use of wind energy resources. We also hold voting rights in the general assembly. TÜREB's position is consistent with our renewable energy strategy, and we support it by taking part in related working activities and information-sharing initiatives.

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

143000

(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 provided represents annual membership fees paid to the organization. The aim of this funding is to support the organization's general operations, including its working groups, stakeholder meetings, and awareness-raising activities related to [climate change / water / energy efficiency etc.]. These fees enable the

organization to carry out research, organize events, and publish reports that can indirectly inform and shape policies, laws, or regulations relevant to environmental issues. The amount reported reflects the actual annual membership fee as invoiced by the organization.

(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 5

(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 (Jeothermal Enerji Derneği) – Geothermal 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

(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

As one of the founding members of JED, we engage in advocacy activities to promote the use of geothermal energy and to contribute to the development of related regulations. JED's focus on renewable energy fully aligns with our corporate energy transition goals. In the reporting year, we supported their position through public awareness campaigns and by contributing to legislative discussions.

(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 provided represents annual membership fees paid to the organization. The aim of this funding is to support the organization's general operations, including its working groups, stakeholder meetings, and awareness-raising activities related to [climate change / water / energy efficiency etc.]. These fees enable the organization to carry out research, organize events, and publish reports that can indirectly inform and shape policies, laws, or regulations relevant to environmental issues. The amount reported reflects the actual annual membership fee as invoiced by the organization.

(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 6

(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 :H2DER (Yeşil Hidrojen Üreticileri Derneği) – Green Hydrogen Producers 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

We contribute our sectoral expertise to help unlock the country's green hydrogen potential through seminars, conferences, summits, and publications organized by H2DER. Their position fully aligns with our commitment to green energy, and we support this stance by engaging in knowledge-sharing events.

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

100000

(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 provided represents annual membership fees paid to the organization. The aim of this funding is to support the organization's general operations, including its working groups, stakeholder meetings, and awareness-raising activities related to [climate change / water / energy efficiency etc.]. These fees enable the organization to carry out research, organize events, and publish reports that can indirectly inform and shape policies, laws, or regulations relevant to environmental issues. The amount reported reflects the actual annual membership fee as invoiced by the organization.

(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 7

(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 :ENVER (Enerji Verimliliği Derneği) – Energy Efficiency 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

We take part in awareness-raising activities organized by ENVER to promote the efficient and effective use of energy, and we participate in general assembly voting processes. ENVER's position on energy efficiency aligns with our corporate sustainability goals, and we support their stance by contributing to their awareness initiatives.

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

50000

(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 provided represents annual membership fees paid to the organization. The aim of this funding is to support the organization's general operations, including its working groups, stakeholder meetings, and awareness-raising activities related to [climate change / water / energy efficiency etc.]. These fees enable the organization to carry out research, organize events, and publish reports that can indirectly inform and shape policies, laws, or regulations relevant to environmental issues. The amount reported reflects the actual annual membership fee as invoiced by the organization.

(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 8

(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:

☒ Non-Governmental Organization (NGO) or charitable organization

(4.11.2.3) State the organization or position of individual

United Nations Global Compact Turkey is the local network of the UN Global Compact, promoting corporate sustainability principles on human rights, labor, environment, and anti-corruption.

(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

As a member of the UN Global Compact Turkey, we commit to its ten universal principles on human rights, labor, environment, and anti-corruption, which are consistent with our corporate sustainability policies. We do not aim to influence UNGC's position; our engagement is limited to benefiting from its training, capacity-building programs, and knowledge-sharing platforms.

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

(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 provided represents annual membership fees paid to the organization. The aim of this funding is to support the organization's general operations, including its working groups, stakeholder meetings, and awareness-raising activities related to [climate change / water / energy efficiency etc.]. These fees enable the organization to carry out research, organize events, and publish reports that can indirectly inform and shape policies, laws, or regulations relevant to environmental issues. The amount reported reflects the actual annual membership fee as invoiced by the organization.

(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 9

(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:

☒ Non-Governmental Organization (NGO) or charitable organization

(4.11.2.3) State the organization or position of individual

YEYKAD (Yeşil Yakalı Kadınlar Derneği) Green Collar Women Association is an NGO aiming to empower women in the green transition and promote gender equality in sustainability sectors.

(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

We participate in YEYKAD's events aimed at promoting clean energy transition and increasing the recognition of green technologies, and we hold voting rights within the association. YEYKAD's vision aligns with our values on gender equality and sustainable energy, and we support their initiatives by contributing to their activities.

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

45000

(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 provided represents annual membership fees paid to the organization. The aim of this funding is to support the organization's general operations, including its working groups, stakeholder meetings, and awareness-raising activities related to [climate change / water / energy efficiency etc.]. These fees enable the organization to carry out research, organize events, and publish reports that can indirectly inform and shape policies, laws, or regulations relevant to environmental issues. The amount reported reflects the actual annual membership fee as invoiced by the organization.

(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 10

(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:

☒ Other, please specify :A global network for boards

(4.11.2.3) State the organization or position of individual

Chapter Zero Turkey is the local chapter of the global Chapter Zero network, providing training and guidance to company board members on climate governance and risk management.

(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

Through our membership in Chapter Zero Türkiye, we support efforts to place climate change on boards' agendas and integrate climate-related risks and opportunities into strategic decision-making. We contribute to Chapter Zero Türkiye's activities, participate in their events, and hold representation rights on relevant committees, fully aligning with their vision to advance climate-focused governance.

(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 11

(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:

☒ University or other educational institution

(4.11.2.3) State the organization or position of individual

IICEC is a research center at Sabanci University that conducts policy research and analysis on energy markets, climate change, and sustainable energy systems.

(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

We are represented on IICEC's Executive Board and participate in its events such as conferences, workshops, and seminars. IICEC's research-based approach to energy markets and climate change aligns with our corporate sustainability strategy, and we contribute to its work by sharing our sectoral experience.

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

1786050

(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 provided represents annual membership fees paid to the organization. The aim of this funding is to support the organization's general operations, including its working groups, stakeholder meetings, and awareness-raising activities related to [climate change / water / energy efficiency etc.]. These fees enable the organization to carry out research, organize events, and publish reports that can indirectly inform and shape policies, laws, or regulations relevant to environmental issues. The amount reported reflects the actual annual membership fee as invoiced by the organization.

(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
- [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, in line with environmental disclosure standards or frameworks

(4.12.1.2) Standard or framework the report is in line with

Select all that apply

- ☒ ESRS
- ☒ GRI

(4.12.1.3) Environmental issues covered in publication

Select all that apply

- ☒ Climate change
- ☒ Forests
- ☒ Water

☒ Biodiversity

(4.12.1.4) Status of the publication

Select from:

☒ Complete

(4.12.1.5) Content elements

Select all that apply

☒ Strategy

☒ Governance

☒ Emission targets

☒ Emissions figures

☒ Risks & Opportunities

☒ Water pollution indicators

☒ Content of environmental policies

☒ Value chain engagement

☒ Dependencies & Impacts

☒ Biodiversity indicators

☒ Public policy engagement

☒ Water accounting figures

(4.12.1.6) Page/section reference

110-142

(4.12.1.7) Attach the relevant publication

entegre-faaliyet-raporu-2024.pdf

Row 2

(4.12.1.1) Publication

Select from:

☒ In mainstream reports, in line with environmental disclosure standards or frameworks

(4.12.1.2) Standard or framework the report is in line with

Select all that apply

- ☒ IFRS
- ☒ Other, please specify :TSRS

(4.12.1.3) Environmental issues covered in publication

Select all that apply

- ☒ Climate change
- ☒ Water

(4.12.1.4) Status of the publication

Select from:

- ☒ Complete

(4.12.1.5) Content elements

Select all that apply

- | | |
|---|---|
| <input checked="" type="checkbox"/> Strategy | <input checked="" type="checkbox"/> Dependencies & Impacts |
| <input checked="" type="checkbox"/> Governance | <input checked="" type="checkbox"/> Public policy engagement |
| <input checked="" type="checkbox"/> Emission targets | <input checked="" type="checkbox"/> Water accounting figures |
| <input checked="" type="checkbox"/> Emissions figures | <input checked="" type="checkbox"/> Content of environmental policies |
| <input checked="" type="checkbox"/> Risks & Opportunities | |

(4.12.1.6) Page/section reference

14-60

(4.12.1.7) Attach the relevant publication

ZOREN TSRS_compressed.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:

☒ More than once a year

Water

(5.1.1) Use of scenario analysis

Select from:

☒ Yes

(5.1.2) Frequency of analysis

Select from:

☒ More than once a year

[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

☒ IEA NZE 2050

(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

☒ Market

☒ Technology

(5.1.1.6) Temperature alignment of scenario

Select from:

☒ 1.5°C or lower

(5.1.1.7) Reference year

2021

(5.1.1.8) Timeframes covered

Select all that apply

- ☒ 2025
- ☒ 2030
- ☒ 2040
- ☒ 2050

(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

Regulators, legal and policy regimes

- ☒ Political impact of science (from galvanizing to paralyzing)
- ☒ 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
- ☒ Perception of efficacy of climate regime

Macro and microeconomy

- ☒ Domestic growth
- ☒ Globalizing markets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Assumptions: Energy Transition: The scenario assumes radical changes in the global energy sector, with heavy investments in renewable energy, energy efficiency, electrification, and carbon capture technologies. Technological Development: It anticipates rapid advancements in low-carbon technologies and widespread adoption, particularly for clean energy sources like wind, solar, and hydrogen. Policy and Regulatory Changes: It is assumed that countries and companies will adapt to strict carbon taxes and regulations. Policymakers are expected to adopt more aggressive carbon reduction strategies to meet the Paris Agreement targets. Global Cooperation: The scenario presumes coordinated efforts and global cooperation to implement emission reduction strategies worldwide. Uncertainties: Access to Technology: There is a risk that low-carbon technologies may not be developed or deployed quickly enough, particularly for scaling carbon capture and hydrogen technologies. Political Will and Implementation: Success depends on countries fulfilling their long-term commitments, but some may deviate due to economic or political reasons. Financial Investments: It is uncertain whether the necessary global investments will be secured, particularly in developing countries, where financing challenges could slow the transition. Constraints: Existing Energy Infrastructure: Transitioning from fossil fuel-based infrastructure quickly is costly and technically challenging, and there are infrastructural barriers that may limit the speed of the transition. Social Acceptance: The energy transition may lead to job losses, price increases, and societal resistance, creating social challenges that could take time to overcome. Natural Resource Constraints: There may be shortages of natural resources (e.g., lithium, cobalt) needed for renewable energy projects, which could cause supply chain issues during the transition.

(5.1.1.11) Rationale for choice of scenario

As part of our ongoing commitment to align with global climate objectives, Zorlu Enerji selected the IEA's NZE 2050 scenario due to its robust alignment with the Paris Agreement's goal of limiting global warming to 1.5°C. This scenario is pivotal for mapping out the trajectory toward our long-term net-zero emissions target by 2050. By using the IEA NZE 2050 scenario, we ensure that our short- and medium-term strategies are scientifically validated and benchmarked against the most credible, widely recognized decarbonization pathways. Our emissions targets, validated by the Science Based Targets initiative (SBTi), reflect the ambition required to meet these global climate goals. This scenario offers comprehensive insights into the anticipated energy transition, technology advancements, and policy shifts, which are critical in shaping our operational and strategic decisions. Its selection was driven by our desire to future-proof our business model while contributing to the global effort to combat climate change.

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
- ☒ Market

(5.1.1.7) Reference year

2021

(5.1.1.8) Timeframes covered

Select all that apply

- ☒ 2030
- ☒ 2050
- ☒ 2070
- ☒ 2090

(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

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Assumptions: Data Availability: The tool assumes that comprehensive and accurate data on water-related risks (such as water stress, pollution, and regulatory risks) are available and up-to-date for the locations being assessed. Predictive Accuracy: The tool assumes that its predictive models accurately reflect future water-related risks based on current trends, climate projections, and socio-economic developments. Applicability to Various Sectors: It assumes that water risk metrics and categories are equally applicable across different industries and geographies, despite variations in local conditions and industry-specific factors. Uncertainties: Data Quality and Gaps: There is uncertainty around the quality, granularity, and completeness of the underlying data. In some regions, particularly developing areas, water-related data may be limited or outdated. Local Variations: Water risks can vary significantly at the local level, and the tool may not capture all nuances or site-specific risks, especially for areas with complex water governance or unregulated water use. Climate Change Projections: While the tool incorporates some climate change scenarios, there is inherent uncertainty in predicting the specific impacts of climate change on local water availability, quality, and seasonal variability. Limitations: Broad Scope: The tool provides a high-level risk assessment but may not offer detailed, site-specific insights. For in-depth local assessments, additional tools or localized studies may be necessary. Static Nature: The WWF Risk Filter Tool relies on historical and current data, and may not fully account for rapid changes in water availability or policies in certain regions. Sector-specific Considerations: While the tool is designed for broad use, its recommendations may not fully account for industry-specific water usage patterns, making it necessary to supplement the analysis with sector-focused risk assessments.

(5.1.1.11) Rationale for choice of scenario

In the renewable energy sector, using the WWF Risk Filter Tool to assess water risks makes sense for several key reasons: Water-Intensive Processes: While renewable energy technologies like solar and wind are less water-intensive compared to fossil fuels, other renewable sources, such as geothermal and bioenergy, may require significant water usage for cooling and other processes. The tool can help identify potential water risks in areas where these technologies are deployed. Sustainability Alignment: The WWF Risk Filter Tool aligns well with sustainability objectives. It offers a comprehensive approach to understanding water risks, which is crucial for companies aiming to integrate environmental stewardship into their operational strategies. Risk Identification Across the Supply Chain: The tool evaluates water risks not only for direct operations but also for supply chains and upstream activities. This can help renewable energy companies assess risks related to equipment manufacturing, material sourcing (e.g., for solar panels or wind turbines), and other critical inputs. Proactive Risk Management: By using the tool, your company can take a proactive approach to water-related risks in project development, particularly in water-scarce regions. Identifying risks early can reduce potential disruptions and improve community relations by ensuring responsible water use. Global Reach and Credibility: The WWF Risk Filter Tool is globally recognized and

widely used, offering a robust database and analysis tools that can cater to the needs of both local and international projects. This makes it particularly useful for renewable energy companies working in diverse geographies with varying water stress levels. *Supporting Decision-Making for Project Siting: In the renewable energy sector, the location of projects is crucial. The tool provides insights into local water risks, helping to choose optimal locations for future projects, where water scarcity or regulatory risks could be minimized.*

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☒ RCP 1.9

(5.1.1.2) Scenario used 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

(5.1.1.6) Temperature alignment of scenario

Select from:

- ☒ 1.5°C or lower

(5.1.1.7) Reference year

2021

(5.1.1.8) Timeframes covered

Select all that apply

- ☒ 2025
- ☒ 2030
- ☒ 2040

(5.1.1.9) Driving forces in scenario

Stakeholder and customer demands

- ☒ Consumer attention to impact
- ☒ Impact of nature footprint on reputation

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)

Macro and microeconomy

- ☒ Globalizing markets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

The SSP1-1.9 scenario assumes a global transition towards sustainable development, where social equity improves, international cooperation strengthens, and environmentally friendly technologies are rapidly adopted. It is based on projections starting from the reference year 2021 and extending to 2030, 2050, and 2100. Key assumptions include: Strong international climate policies aligned with the Paris Agreement Rapid decarbonization of energy systems and widespread adoption of renewable energy Deployment of carbon capture and storage technologies Implementation of nature-based solutions (e.g., afforestation) Improvements in education, healthcare, and income distribution that enhance social resilience to climate change Uncertainties include the feasibility of achieving global policy alignment, the speed of technological innovation, and the availability of sufficient financial and natural resources to support the transition. The scenario also assumes global-scale cooperation, which may be constrained by regional political and economic instabilities.

(5.1.1.11) Rationale for choice of scenario

This scenario was chosen because it represents the most ambitious and sustainable climate pathway, directly aligned with the Paris Agreement's 1.5°C target and with Zorlu Enerji's long-term decarbonization strategy. It allows the company to assess the resilience of its hydropower and geothermal operations under a low-emission, low-physical-risk future. By analyzing this optimistic pathway, the company can identify the strategic, technological, and operational transformations required to achieve net-zero emissions by around 2050 and to enhance climate resilience. The SSP1-1.9 scenario also provides critical insights into how societal improvements (education, health, equality) can reduce vulnerability to climate risks, making it a relevant benchmark for integrating sustainability into strategic planning and risk management.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☒ RCP 4.5

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☒ SSP2

(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

(5.1.1.6) Temperature alignment of scenario

Select from:

☒ 2.5°C - 2.9°C

(5.1.1.7) Reference year

2021

(5.1.1.8) Timeframes covered

Select all that apply

☒ 2025

☒ 2030

☒ 2040

(5.1.1.9) Driving forces in scenario

Stakeholder and customer demands

☒ Consumer attention to impact

☒ Impact of nature footprint on reputation

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)

Macro and microeconomy

☒ Globalizing markets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

The SSP2-4.5 scenario assumes a “middle-of-the-road” world where global cooperation is moderate, and progress on sustainability and climate policies is uneven across regions. It projects a radiative forcing level of 4.5 W/m² by 2100 and represents a medium-level emissions pathway. Climate policies are implemented inconsistently at regional scales, resulting in only gradual technological advances and limited improvements in social indicators such as education and healthcare in some regions. Key assumptions include: Moderate and uneven implementation of climate policies Continued reliance on fossil fuels, with gradual adoption of renewable energy Moderate technological development and infrastructure expansion Slow but steady economic growth and population increase Persistent regional disparities in policy, economic capacity, and climate resilience Uncertainties include how quickly technology and renewable energy adoption will progress, the degree of regional policy alignment that can be achieved, and the stability of socio-political systems under increasing climate pressures. Constraints include limited predictability of long-term regional policy shifts and the difficulty of modeling complex interactions between social, economic, and climate variables at the global level.

(5.1.1.11) Rationale for choice of scenario

This scenario was selected to test the company’s resilience under a plausible and balanced future in which global climate action is only partially effective, and physical climate risks continue to rise moderately. SSP2-4.5 provides a realistic benchmark for assessing how hydropower and geothermal operations might be affected in a world where emissions stabilize after continued growth and global average temperatures increase by around 2.5–3°C by the end of the century. By analyzing this scenario, the company can identify potential operational, financial, and supply chain vulnerabilities that could emerge under moderate emissions and policy fragmentation. It helps the company stress-test its strategies against a “business as usual” pathway and highlights the importance of accelerating internal climate adaptation and mitigation measures to remain resilient in such a world.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☒ RCP 8.5

(5.1.1.2) Scenario used 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

(5.1.1.6) Temperature alignment of scenario

Select from:

☒ 4.0°C and above

(5.1.1.7) Reference year

2021

(5.1.1.8) Timeframes covered

Select all that apply

☒ 2025

☒ 2030

☒ 2040

(5.1.1.9) Driving forces in scenario

Stakeholder and customer demands

- ☑ Impact of nature footprint on reputation

Regulators, legal and policy regimes

- ☑ Political impact of science (from galvanizing to paralyzing)

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

The SSP5-8.5 scenario assumes a fossil fuel-intensive world with rapid population growth, limited transition to clean energy, and ineffective climate policies. It projects a radiative forcing level of 8.5 W/m² by 2100, with global average temperatures rising by approximately 4.3°C above pre-industrial levels. Greenhouse gas emissions continue to rise throughout the century, driven by high energy demand and strong economic growth based on carbon-intensive technologies. Key assumptions include: Continued and accelerated fossil fuel consumption Weak or absent international climate policies and cooperation Very limited deployment of renewable energy and carbon capture technologies Rapid economic and population growth increasing energy and resource demand Minimal consideration of environmental or social sustainability in development pathways Uncertainties include the potential for disruptive technological breakthroughs that could shift energy systems away from fossil fuels, as well as the degree of physical climate impacts and their feedback effects on economies and societies. Constraints include the difficulty of accurately projecting extreme physical impacts (such as sea-level rise, biodiversity loss, and climate-induced migration) and their cascading socioeconomic consequences.

(5.1.1.11) Rationale for choice of scenario

This scenario was chosen to assess the company's resilience under the most severe and high-emissions climate future, where physical climate risks are extreme and continue to escalate. SSP5-8.5 serves as a worst-case stress test to evaluate how hydropower and geothermal operations could be disrupted by intense heatwaves, droughts, water scarcity, biodiversity loss, and large-scale migration driven by climate impacts. By analyzing this scenario, the company can understand the upper bound of potential operational and financial risks, including severe supply chain disruptions, infrastructure damage, and regulatory shocks. Using SSP5-8.5 highlights the critical importance of accelerating decarbonization efforts and climate adaptation measures to prevent and prepare for such high-risk futures.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☒ BNEF NEO

(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

☒ Liability

(5.1.1.6) Temperature alignment of scenario

Select from:

☒ 3.0°C - 3.4°C

(5.1.1.7) Reference year

(5.1.1.8) Timeframes covered

Select all that apply

☒ 2030

☒ 2050

(5.1.1.9) Driving forces in scenario

Stakeholder and customer demands

☒ Consumer attention to impact

Regulators, legal and policy regimes

☒ Global regulation

Direct interaction with climate

☒ Perception of efficacy of climate regime

Macro and microeconomy

☒ Globalizing markets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

This scenario assumes a poorly regulated voluntary carbon market with low-quality credits and persistent oversupply. All types of credits (avoidance and removal) are accepted. Prices remain low due to weak demand relative to supply (~\$11/tCO₂ in 2030, ~\$47/tCO₂ in 2050). Uncertainties include future regulatory tightening, market consolidation, and buyer preference shifts toward higher-quality credits. Constraints include limited enforcement mechanisms and lack of standardization.

(5.1.1.11) Rationale for choice of scenario

This scenario was chosen to evaluate transition risks under a regulated, balanced carbon market aligned with international climate goals. It helps assess potential financial exposure if carbon credit demand and prices rise sharply as policy pressure increases.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☒ BNEF NEO

(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

☒ Liability

(5.1.1.6) Temperature alignment of scenario

Select from:

☒ 2.0°C - 2.4°C

(5.1.1.7) Reference year

2021

(5.1.1.8) Timeframes covered

Select all that apply

☒ 2030

☒ 2050

(5.1.1.9) Driving forces in scenario

Stakeholder and customer demands

☒ Consumer attention to impact

Regulators, legal and policy regimes

☒ Global regulation

Direct interaction with climate

☒ Perception of efficacy of climate regime

Macro and microeconomy

☒ Globalizing markets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

This scenario assumes both avoidance and removal-based credits are included, with Article 6 mechanisms shaping market design. Firms drive demand initially, but governments gradually dominate the market. Prices rise as demand increases (~\$48/tCO₂ in 2030, peaking ~\$217/tCO₂ in 2029, and declining to ~\$99/tCO₂ by 2050). Uncertainties include the speed of Article 6 implementation, government participation, and quality verification systems. Constraints involve governance capacity and cross-border regulatory alignment.

(5.1.1.11) Rationale for choice of scenario

This scenario was chosen to evaluate transition risks under a regulated, balanced carbon market aligned with international climate goals. It helps assess potential financial exposure if carbon credit demand and prices rise sharply as policy pressure increases.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☒ BNEF NEO

(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

☒ Liability

(5.1.1.6) Temperature alignment of scenario

Select from:

☒ 1.6°C - 1.9°C

(5.1.1.7) Reference year

2021

(5.1.1.8) Timeframes covered

Select all that apply

☒ 2030

☒ 2050

(5.1.1.9) Driving forces in scenario

Stakeholder and customer demands

☒ Consumer attention to impact

Regulators, legal and policy regimes

☒ Global regulation

Direct interaction with climate

☒ Perception of efficacy of climate regime

Macro and microeconomy

☒ Globalizing markets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Based on BNEF New Energy Outlook projections, this scenario assumes global renewable installed capacity triples by 2030 and renewable share in electricity grows rapidly. This accelerates decarbonization and indirectly drives carbon prices upward due to strong demand for emission reduction. Uncertainties include pace of technology cost reductions, investment flows, and grid integration challenges. Constraints include supply chain bottlenecks and policy delays in renewable deployment.

(5.1.1.11) Rationale for choice of scenario

This scenario was selected to understand transition risks under a rapid clean energy expansion. It helps assess the company's resilience to strong carbon price pressure driven by accelerating renewable investments and decarbonization trends.

[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 outcomes of the scenario analysis and any implications for other environmental issues

Zorlu Enerji's scenario analysis, incorporating the IEA NZE 2050 scenario alongside SSP1-1.9, SSP2-4.5, SSP5-8.5, and BloombergNEF market-based scenarios, revealed key insights about the company's long-term resilience and adaptability to climate change. These scenarios provided a comprehensive range of possible futures—from a rapid global transition to a sustainable, low-emission economy (SSP1-1.9 and IEA NZE 2050), to a “middle-of-the-road” pathway with fragmented policies (SSP2-4.5), and a fossil fuel-intensive world with severe physical risks (SSP5-8.5). BloombergNEF's Voluntary, Hybrid, and Renewable Energy-focused Market scenarios further enabled assessment of transition risks linked to carbon pricing dynamics and voluntary carbon market structures. The combined analysis emphasized the importance of accelerating the transition to low-carbon technologies and decarbonizing energy production. Zorlu Enerji aims to achieve substantial emissions reductions through expanding its renewable energy portfolio, developing hybrid power plants, and integrating Carbon Capture, Utilization, and Storage (CCUS) technologies. The company is also leading R&D efforts to pioneer CCUS implementation in Turkey. Physical risk projections across the scenarios highlighted hydrological droughts threatening hydropower plants and geothermal reservoirs, as well as wildfires and floods impacting operations. In response, Zorlu Enerji is developing hybrid plants to reduce generation losses, deploying closed-loop water systems to conserve resources, and prioritizing supply chain localization to prevent disruptions. Scenario outcomes have influenced strategic decisions, such as scaling up renewable capacity and exploring decarbonization solutions like carbon sequestration. Financially, the scenario analysis identified potential impacts from carbon pricing and the commercialization of CCUS technologies. BloombergNEF market scenarios informed assessments of both optimistic and pessimistic carbon price trajectories, helping evaluate opportunities for revenue generation through carbon sequestration services as carbon markets mature. The insights from these scenarios have guided the company's resilience strategy, financial planning, and risk management, reinforcing its long-term alignment with global decarbonization efforts. Investments in digital technologies, including smart grids and digital twins, have also been prioritized to enhance operational efficiency. In summary, the scenario analysis confirmed the need for major investments in renewable energy, CCUS, and energy efficiency projects to mitigate climate-related risks. Zorlu Enerji remains committed to achieving its science-based emissions reduction targets validated by SBTi, ensuring the resilience of its business model in an increasingly decarbonized global market.

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 outcomes of the scenario analysis and any implications for other environmental issues

Zorlu Enerji's scenario analysis related to water emphasizes the critical role that water resources play in the company's operations, especially for its hydropower and geothermal plants. The analysis identified key risks, including hydrological droughts, reduced water availability, and competition for water resources, which could affect both the operational capacity and long-term resilience of the company's energy production. In geothermal power plants, there is intensive use of fossil water, and changes in the quantity of this fluid significantly impact production. Through water-related scenario analysis studies, Zorlu Enerji has provided input to prioritize geothermal licenses within its portfolio, ensuring resource availability aligns with operational sustainability. Specifically, production licenses for Alkan 1-2 GPP and Ağrı GPP have been earmarked for power plant investment by 2030 to secure medium-term energy generation. To mitigate water-related risks, Zorlu Enerji is investing in closed-loop water systems for geothermal plants, designed to minimize water use and enhance operational efficiency. These systems help reduce the impact of water scarcity and ensure the sustainability of its geothermal operations. Additionally, hybrid power plant development was prioritized to address potential generation losses caused by water shortages. These hybrid solutions allow the company to integrate other renewable energy sources, like wind or solar, in locations where water resources may be limited, ensuring diversified and resilient energy production. The outcomes of the water scenario analysis have informed Zorlu Enerji's broader environmental strategy. It has led to capacity-building across the organization, particularly in water resource management and environmental resilience. The scenario analysis also supports target-setting and transition planning, ensuring Zorlu Enerji adapts to water-related challenges over short, medium, and long-term horizons. This includes ensuring that water-related risks are incorporated into business continuity planning and that measures are in place to secure water access in critical energy production areas. Furthermore, the implications extend to financial planning, with water risk being integrated into future investment decisions. The scenario analysis has prompted Zorlu Enerji to evaluate the financial impact of potential disruptions due to water scarcity and to allocate capital for improving water-use efficiency. The company is exploring opportunities in water-related technologies and partnerships to build resilience against growing environmental uncertainties, particularly in regions where water competition could directly impact operations. In summary, Zorlu Enerji's scenario analysis for water has strengthened the

company's business model resilience and risk management framework. By identifying critical water risks and prioritizing specific geothermal projects, the company ensures that its long-term growth and operational stability are maintained, even in an increasingly water-scarce world.
[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 Energy Climate Transition Plan Activities for Achieving Net-Zero Emissions by 2040 Renewable Energy Expansion: Increase the capacity of renewable energy sources (solar, wind, hydro) in our energy portfolio to significantly reduce reliance on fossil fuels. Energy Efficiency Initiatives: Implement energy efficiency measures across all operations and facilities to reduce energy consumption and emissions. Carbon Capture and Storage (CCS): Invest in and develop carbon capture technologies to minimize emissions from existing fossil fuel operations. Electrification of Operations: Transition from fossil fuel-based systems to electric systems, where feasible, particularly in transportation and industrial processes. Sustainable Supply Chain Management: Collaborate with suppliers to promote sustainable practices and reduce emissions throughout the supply chain. Invest in Research and Development: Support innovative technologies and practices that can lead to significant emissions reductions and enhance sustainability. Community Engagement and Education: Foster partnerships with local communities and stakeholders to promote awareness and understanding of climate change and sustainability initiatives. Policy Advocacy: Actively engage with policymakers to support regulations and incentives that facilitate the transition to a low-carbon economy. Monitoring and Reporting: Establish a robust framework for tracking emissions and progress towards

targets, ensuring transparency and accountability. *Employee Training and Development:* Provide training programs to equip employees with the skills needed to implement sustainability initiatives effectively. *Biodiversity and Ecosystem Conservation:* Integrate practices that protect and enhance biodiversity in project development and operational processes. *Resilience Planning:* Develop strategies to enhance resilience against the impacts of climate change, ensuring operational continuity in the face of environmental challenges.

(5.2.7) 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

(5.2.8) Description of feedback mechanism

Shareholder Surveys: Distribute structured surveys to gather quantitative and qualitative feedback on the climate transition plan, including key priorities and concerns in the scope of the double materiality process. *Focus Groups:* Organize focus group discussions with a diverse range of shareholders to facilitate in-depth conversations and insights regarding the transition plan. *One-on-One Meetings:* Conduct individual meetings with key shareholders to discuss their perspectives, expectations, and suggestions related to the climate transition strategy. *Investor Webinars:* Host webinars to present the climate transition plan and gather real-time feedback from shareholders, allowing for interactive Q&A sessions. *Annual General Meetings (AGMs):* Utilize AGMs to present the climate transition plan and encourage shareholder dialogue, enabling feedback to be collected directly during the event. *Feedback Forms:* Provide accessible feedback forms on the company's website, allowing shareholders to submit their thoughts and suggestions at their convenience. *Online Platforms:* Leverage digital platforms and social media channels to facilitate discussions and gather feedback from a broader shareholder base. *Performance Reviews:* Include shareholder feedback as a component of performance reviews related to sustainability and climate initiatives, ensuring their input is valued and acted upon. *Regular Updates:* Provide regular updates on the climate transition plan and invite feedback through newsletters or reports, maintaining open lines of communication. The integrated annual report is the main instrument for updates on the climate transition plan.

(5.2.9) Frequency of feedback collection

Select from:

☒ Annually

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

The transition plan is based on several key assumptions and dependencies: *Carbon pricing:* A national emissions trading system (ETS) will be implemented in Türkiye by 2027, starting at approximately €11.6/tCO₂e and reaching €254.9/tCO₂e by 2040. *Regulatory developments:* The Climate Law will be enacted by 2027, and Türkiye's ETS will be progressively aligned with the EU ETS under different policy scenarios. *Policy alignment:* Full alignment with the European Green Deal, CBAM, and broader energy transition policies is assumed. *Investment environment:* Access to finance, technology, and infrastructure for renewable energy and clean technologies will be available. *Supply chain transformation:* The availability of low-carbon and energy-efficient products and services from suppliers will increase to

support Scope 3 emission reductions. Dependencies include stable regulatory frameworks, access to green finance, cooperation of suppliers and business partners in decarbonization efforts, and the timely availability of clean technology solutions.

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

Significant progress has been made in implementing the transition plan: Exiting carbon-intensive thermal power and natural gas distribution operations, including the planned phase-out of Israeli operations. Commissioning of rooftop solar PV at the Kizildere-3 geothermal plant (completed in November 2024). Launch of the GECO Project at Kizildere Geothermal Power Plant to pilot CO₂ capture and reinjection (CCS). Initiating full electrification of the corporate vehicle fleet starting in 2024. Implementation of energy efficiency projects under ISO 50001, achieving annual energy consumption reductions. Expansion of I-REC/YEK-G certified renewable energy use for internal consumption. Deployment of low-carbon grid infrastructure and SF₆ reduction measures under OEDAŞ. Introducing environmental criteria in supplier selection, shifting logistics to lower-emission modes (Ro-Ro, rail), and reducing Scope 3.15 emissions by exiting Israeli investments. These actions mark substantial advancement towards the 2030 and 2040 emission intensity and absolute reduction targets.

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

SBTi Validation Report.pdf

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

Select all that apply

- ☒ Forests
- ☒ Water
- ☒ Biodiversity

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

In addition to emission targets, our climate transition plan incorporates crucial areas such as biodiversity, water management, and forestry. Biodiversity: Protecting and promoting biodiversity is essential for maintaining ecosystem balance and resilience. Our plan includes initiatives aimed at preserving natural habitats and enhancing biodiversity in our operational areas, recognizing that healthy ecosystems contribute to carbon sequestration and sustainable resource management. Water Management: Efficient water management is vital in addressing the impacts of climate change. Our transition plan outlines strategies to optimize water use, minimize waste, and implement sustainable practices that protect local water resources, ensuring their availability for future generations. Forestry: Forests play a critical role in carbon capture and climate regulation. Our commitment to sustainable forestry practices involves supporting reforestation efforts and responsible land management to enhance carbon sinks and protect forest ecosystems. By integrating these elements into our climate transition plan, we aim to create a holistic approach that not only addresses climate change but also fosters environmental sustainability and resilience.

[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

☒ 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

☒ Water

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

Zorlu Enerji's products and services are strategically aligned with its commitment to sustainability and its response to environmental risks and opportunities. **Sustainable Energy Solutions:** By focusing on renewable energy generation, such as wind, solar, and hydroelectric power, Zorlu Enerji is addressing the urgent need to reduce greenhouse gas emissions. This not only mitigates regulatory and reputational risks associated with fossil fuel dependency but also positions the company as a leader in the transition to a low-carbon economy. **Energy Efficiency Products:** The development and promotion of energy-efficient technologies and services reflect a proactive approach to environmental challenges. By helping consumers and businesses reduce their energy consumption, Zorlu Energy not only supports cost savings for customers but also contributes to broader energy conservation goals. **Innovative Technologies:** Investment in innovative technologies, such as smart grid systems and energy storage solutions, enables Zorlu Energy to enhance the reliability and efficiency of its energy offerings. These advancements can help mitigate risks related to energy supply fluctuations and improve resilience against climate impacts. **Integration of Environmental Considerations:** The incorporation of biodiversity, water management, and sustainable forestry practices into its operations and product offerings demonstrates Zorlu Energy's holistic approach to environmental stewardship. By addressing these factors, the company not only enhances its brand reputation but also ensures compliance with emerging regulations and societal expectations. **Market Demand and Responsiveness:** The growing demand for clean energy and sustainable practices presents significant opportunities for Zorlu Energy. By developing products and services that align with consumer preferences for sustainability, the company can capture new market segments and drive revenue growth.

Upstream/downstream value chain

(5.3.1.1) Effect type

Select all that apply

- ☒ 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
- ☒ Water

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

Upstream Activities: In upstream operations, which include resource extraction and energy generation, environmental risks such as regulatory changes, climate variability, and biodiversity loss directly influence Zorlu Enerji's strategy. To mitigate these risks, the company engages with green critical suppliers who invest in sustainable practices and technologies, such as cleaner extraction methods and renewable energy sources. This proactive approach not only reduces operational risks but also aligns with regulatory compliance and stakeholder expectations, enhancing Zorlu's reputation as a responsible energy provider. **Downstream Activities:** In downstream operations, which involve energy distribution and customer engagement, environmental opportunities, such as the increasing demand for clean energy solutions, shape Zorlu Enerji's strategy. The company capitalizes on these opportunities by developing innovative products and services, such as increasing investments in solar power business as energy-efficient technologies and renewable energy offerings such as green tariffs, and IREC certifications. By responding to

consumer preferences for sustainability, Zorlu Enerji can strengthen customer loyalty and expand its market share. Overall, Zorlu Enerji's strategy is influenced by a comprehensive understanding of environmental risks and opportunities across both upstream and downstream activities, guiding its efforts toward sustainability and resilience in the energy sector.

Investment in R&D

(5.3.1.1) Effect type

Select all that apply

- ☒ 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

For our CCUS projects (such as GECO) that we are working on under R&D, there are currently no suitable standards available for generating carbon credits that would make the project financially feasible. The lack of an appropriate methodology for CCUS projects under standards like VCS and Gold Standard poses a risk. However, having a suitable methodology would enable the generation of high-quality carbon credits, which could be sold at a higher price due to the technology used, turning this situation into an opportunity. Also, current technology seems to be expensive which is a financial risk for Zorlu Enerji.

Operations

(5.3.1.1) Effect type

Select all that apply

- ☒ 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

☒ Water

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

In the case of hydroelectric power plants, changes in precipitation patterns will negatively impact production due to reduced flow rates. A similar situation is also valid for wind power plants in the long term, as changes in wind characteristics will adversely affect production at the facility. Additionally, extreme weather events that lead to heavy rainfall can pose a risk by causing damage to solar panels.

[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

☒ 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

☒ Water

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

The following environmental opportunities are included in financial planning related to revenues: demand for renewable energy, I-REC, YEK-G, and carbon credits generated through eligible investments are expected to increase. Zorlu Energy is already conducting sales of such green energy, certificates and carbon credits, which is considered an opportunity in terms of revenue. Another opportunity can be identified as holding renewable energy plant licenses, which facilitate access to financing, and the increasing demand for these licenses. As a risk, extreme weather events caused by climate change, along with changes in underground and surface water regimes, present a long-term risk of production and revenue loss for hydroelectric, solar, and geothermal power plants.

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

- ☒ 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

Having SBTi-approved targets and progressing in line with these targets facilitates access to green financing (at lower costs), creating an opportunity for both short- and long-term liabilities by offering interest rate advantages during the repayment periods of SLBs and Eurobonds issued based on these targets. However, investing in geothermal power plants that could increase emissions presents the risk of moving in the opposite direction of achieving targets, particularly endangering Scope 1 emissions, which could raise borrowing costs. This is considered a risk

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

- ☒ 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
- ☒ Water

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

Extreme weather events and catastrophic events caused by climate change could lead to physical damage to intangible assets such as plants, facilities, and equipment. This could increase insurance risk premiums, creating a negative financial impact. Geothermal facilities, due to the presence of deep drilling wells, can provide access to carbon sinks at a lower cost, which can be seen as an opportunity for potential CCUS projects. The V2Grid-Grid2V energy distribution trials conducted through the EV charging network in the investment portfolio are also considered a forward-looking opportunity. The base load shortfall that will result from the increasing trend and focus on renewable energy sources, along with the power plant licenses owned by Zorlu Energy, presents an opportunity to be addressed through hybrid and energy storage power plants.

[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
	<i>Select from:</i> <input checked="" type="checkbox"/> Yes	<i>Select all that apply</i> <input checked="" type="checkbox"/> A sustainable finance taxonomy	<i>Select from:</i> <input checked="" type="checkbox"/> 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 framework

(5.4.1.3) Objective under which alignment is being reported

Select from:

☒ Total across climate change mitigation and climate change adaption

(5.4.1.5) Financial metric

Select from:

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

19759965000000

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

61

(5.4.1.8) Percentage share of selected financial metric planned to align in 2025 (%)

61

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

75

(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 the identified opportunities, we use a metric that calculates the share of Zorlu Enerji's revenues generated from sustainable business models. The definition of "sustainable business model" is based on the framework provided by S&P, particularly within the Corporate Sustainability Assessment (CSA). In this context, the metric "Net Sales from Sustainable Activities" is applied, which measures the proportion of total revenues derived from environmentally and socially sustainable products and services. For the calculation, revenues from activities such as renewable energy generation (solar, wind, hydro, geothermal), certified green energy sales (YEK-G, I-REC), carbon credits, and long-term green power purchase agreements (PPAs) are considered sustainable revenues. These figures are compared against total revenues, thereby quantifying the contribution of sustainable business models to overall income. The results of this calculation are regularly reported and monitored to ensure transparency and to demonstrate the company's progress in transitioning toward sustainable value creation.

[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-aligned

(5.4.2.4) Financial metrics

Select all that apply

☒ Turnover

(5.4.2.5) Types of substantial contribution

Select all that apply

☒ Activity enabling mitigation

(5.4.2.6) Taxonomy-aligned turnover from this activity in the reporting year (currency)

5598911000000

(5.4.2.7) Taxonomy-aligned turnover from this activity as % of total turnover in the reporting year

18.88

(5.4.2.8) Taxonomy-aligned turnover from this activity that substantially contributed to climate change mitigation as a % of total turnover in the reporting year

(5.4.2.9) Taxonomy-aligned turnover from this activity that substantially contributed to climate change adaptation as a % of total turnover in the reporting year

0

(5.4.2.27) Calculation methodology and supporting information

Calculated based on the revenue from electricity generated and sold from geothermal energy sources.

(5.4.2.28) Substantial contribution criteria met

Select from:

☒ Yes

(5.4.2.29) Details of substantial contribution criteria analysis

The activity involves the generation of electricity from geothermal energy sources. It meets the EU Taxonomy technical screening criteria for substantial contribution to climate change mitigation, as it produces electricity from a near-zero carbon source and does not exceed the lifecycle GHG emission threshold of 100g CO₂e/kWh as defined in the Climate Delegated Act (Annex I).

(5.4.2.30) Do no significant harm requirements met

Select from:

☒ Yes

(5.4.2.31) Details of do no significant harm analysis

The activity complies with the “do no significant harm” criteria by performing regular environmental impact assessments, implementing closed-loop systems to prevent groundwater contamination, and ensuring compliance with national legislation on waste and water management.

(5.4.2.32) Minimum safeguards compliance requirements met

Select from:

☒ Yes

(5.4.2.33) Attach any supporting evidence

entegre-faaliyet-raporu-2024.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-aligned

(5.4.2.4) Financial metrics

Select all that apply

☒ Turnover

(5.4.2.5) Types of substantial contribution

Select all that apply

☒ Activity enabling mitigation

(5.4.2.6) Taxonomy-aligned turnover from this activity in the reporting year (currency)

1192925075

(5.4.2.7) Taxonomy-aligned turnover from this activity as % of total turnover in the reporting year

40.22

(5.4.2.8) Taxonomy-aligned turnover from this activity that substantially contributed to climate change mitigation as a % of total turnover in the reporting year

100

(5.4.2.9) Taxonomy-aligned turnover from this activity that substantially contributed to climate change adaptation as a % of total turnover in the reporting year

0

(5.4.2.27) 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.

(5.4.2.28) Substantial contribution criteria met

Select from:

☒ Yes

(5.4.2.29) 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 CO₂e/kWh).

(5.4.2.30) Do no significant harm requirements met

Select from:

☒ Yes

(5.4.2.31) Details of do no significant harm analysis

The activity meets the “do no significant harm” criteria by minimizing transmission losses, applying SF₆ leak detection and maintenance programs, and ensuring compliance with environmental regulations on electromagnetic fields, noise, and land use.

(5.4.2.32) Minimum safeguards compliance requirements met

Select from:

☒ Yes

(5.4.2.33) Attach any supporting evidence

entegre-faaliyet-raporu-2024.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-aligned

(5.4.2.4) Financial metrics

Select all that apply

☒ Turnover

(5.4.2.5) Types of substantial contribution

Select all that apply

☒ Activity enabling mitigation

(5.4.2.6) Taxonomy-aligned turnover from this activity in the reporting year (currency)

1395847000000

(5.4.2.7) Taxonomy-aligned turnover from this activity as % of total turnover in the reporting year

4.71

(5.4.2.8) Taxonomy-aligned turnover from this activity that substantially contributed to climate change mitigation as a % of total turnover in the reporting year

100

(5.4.2.9) Taxonomy-aligned turnover from this activity that substantially contributed to climate change adaptation as a % of total turnover in the reporting year

0

(5.4.2.27) Calculation methodology and supporting information

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

(5.4.2.28) Substantial contribution criteria met

Select from:

☒ Yes

(5.4.2.29) 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 CO₂e/kWh lifecycle GHG threshold, and fulfilling the requirements set out in Annex I of the Climate Delegated Act.

(5.4.2.30) Do no significant harm requirements met

Select from:

☒ Yes

(5.4.2.31) 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.

(5.4.2.32) Minimum safeguards compliance requirements met

Select from:

☒ Yes

(5.4.2.33) Attach any supporting evidence

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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-aligned

(5.4.2.4) Financial metrics

Select all that apply

☒ Turnover

(5.4.2.5) Types of substantial contribution

Select all that apply

☒ Activity enabling mitigation

(5.4.2.6) Taxonomy-aligned turnover from this activity in the reporting year (currency)

835956000000

(5.4.2.7) Taxonomy-aligned turnover from this activity as % of total turnover in the reporting year

2.82

(5.4.2.8) Taxonomy-aligned turnover from this activity that substantially contributed to climate change mitigation as a % of total turnover in the reporting year

100

(5.4.2.9) Taxonomy-aligned turnover from this activity that substantially contributed to climate change adaptation as a % of total turnover in the reporting year

0

(5.4.2.27) Calculation methodology and supporting information

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

(5.4.2.28) Substantial contribution criteria met

Select from:

☒ Yes

(5.4.2.29) 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 CO₂e/kWh, and ensuring environmental impact assessments are conducted as required by Annex I.

(5.4.2.30) Do no significant harm requirements met

Select from:

☒ Yes

(5.4.2.31) 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.

(5.4.2.32) Minimum safeguards compliance requirements met

Select from:

☒ Yes

(5.4.2.33) Attach any supporting evidence

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[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) Please 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:

☒ Carbon capture, utilization, and storage (CCUS)

(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

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

0

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

0

(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

GEKO Project: Electricity generation from geothermal resources in our country creates significant emissions due to the unique structure of the reservoir. In this context, studies are carried out for the capture and underground storage of geothermal resource emissions within the scope of the project initiated in cooperation with international institutions and organizations within the scope of the EU Horizon 2020 program. Pilot carbon capture and storage facility was established at our Kızıldere III Geothermal Power Plant and capture and storage activities were initiated. With the project, it was aimed to reduce carbon emissions to zero in areas where geothermal activities are carried out. The project, which has partners from 9 different countries, completed in 2023. With the pilot project, 1000 tons of CO₂ was pumped into the reservoir annually. To enable the scale-up implementation of the project, appropriate financial conditions must be secured. Currently, preliminary studies on techno-economic feasibility and evaluation of carbon market changes are being conducted.

Row 2**(5.5.7.1) Technology area**

Select from:

☒ Other, please specify :Thermal energy storage**(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**

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

8188510

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

0

(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

GeoSmart Project: GeoSmart project aims to increase the flexibility and efficiency of geothermal power plants. Project consortium includes 19 institutions, organizations, universities and institutes from 8 different countries. Within the scope of the project; thermal storage system were demonstrated in the Insheim fields in Germany and the Zorlu Kizildere geothermal power plant in Turkey. Installed system in the Kizildere GPP aimed to reduce the re-injection temperature of the geothermal fluid. After the installation phase, system was tested according to use-cases. Project completed in 2024. With this technology, the efficiency of the geothermal power plant operations is expected to increase, thereby project is indirectly contributing to the reduction of carbon emissions.

Row 3

(5.5.7.1) Technology area

Select from:

☒ Other, please specify :Electrical Vehicles

(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

14

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

1829507

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

0

(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

With the brands of ZES, a network of electric vehicle charging stations, and electrip, an hourly electric vehicle rental platform, which are among the investments made by Zorlu Energy Electricity Generation AŞ to implement new generation technologies as an R&D project, it is among the partners of the eCharge4Drivers Project, which was launched for the same purpose in Europe. Drivers of electric vehicles, whose sales are increasing rapidly throughout Europe, still have difficulties in finding suitable charging options, which limits the ease of use of electric vehicles. With the eCharge4Drivers Project, which aims to significantly improve the electric vehicle charging experience in cities and intercity journeys, users can, in line with their expectations on charging options, mobility, and parking habits, develop pilot projects in 10 areas in Europe, including cities and the Trans-European Transport Network. The project has 32 partners from 12 different countries. The project, which started in 2020 and completed in 2024. The project aims to reduce the carbon emission intensity in the electricity grid.

Row 4

(5.5.7.1) Technology area

Select from:

☒ Other, please specify :Recycling of components

(5.5.7.2) Stage of development in the reporting year

Select from:

☒ Basic academic/theoretical research

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

10

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

2194047

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

(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

Continuing to develop its growth strategy in the axis of innovation and R&D, Zorlu Energy applied within the scope of the JIDEP (Joint Industrial) program, which is the continuation of the Horizon 2020 grant program established by the European Union to support research, development, and innovation projects. The Data Exchange Pipeline - Joint Industrial Data Exchange Platform project which aims to recycle composite materials used in many different sectors, especially in the automotive and maritime sectors, it is aimed to directly contribute to the circular economy and waste management. Jidep project was completed succesfully in 2024.

Row 7

(5.5.7.1) Technology area

Select from:

☒ Wind energy generation

(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

4

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

1643443

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

9.5

(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

The Twinwest project aims to develop a universal, open-source, and cyber-secure digital twin that will provide valuable insights to onshore wind farm investors regarding both current operations and future investments. The project includes a virtual use case, simulating potential new investments, and a physical use case, simulating existing operations. Within the physical use case, predictive maintenance and failure analysis contribute to improved wind farm performance, thereby indirectly supporting carbon emission reduction. The project started in 2024 and it is funded by Horizon Europe program.

Row 9

(5.5.7.1) Technology area

Select from:

☒ Other, please specify :Geothermal Energy

(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

4

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

1561740

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

90

(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

The nGEL Project is an R&D project funded by Horizon Europe framework, aiming to test a trigeneration system (electricity generation, heating, and cooling) at a geothermal power plant. The project will not only enhance plant efficiency but also assess the potential role of the plant in the reserve electricity market. Project started in 2024. Zorlu Enerji Kızıldere-II geothermal power plant is the demonstration site of the developed technology.

Row 11

(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

2

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

0

(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

PLAMES (Integrated Planning Of Multi-Energy Systems): Aims to optimize multi-energy systems by enabling integrated planning of electricity, heat, and gas networks.

Row 12

(5.5.7.1) Technology area

Select from:

☒ Smart grid integration

(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

9

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

0

(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

FLEXIGRID (Enabling Flexibility for Future Distribution Grid): Develops digital platforms and control mechanisms to implement flexibility services in future electricity distribution grids.

Row 13

(5.5.7.1) Technology area

Select from:

☒ Smart grid integration

(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

6

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

0

(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

BD4OPEM (Big Data for Open innovation Energy Marketplace): Establishes a big data analytics infrastructure to support innovative business models in energy markets.

Row 14

(5.5.7.1) Technology area

Select from:

☒ Smart grid integration

(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

6

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

0

(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

BD4NRG (Big Data for Next Generation Energy): Develops AI-based big data decision support systems for next-generation energy systems.

Row 15

(5.5.7.1) Technology area

Select from:

☒ Demand response

(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

0

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

0

(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

HASAT Phase-2: Focuses on increasing energy efficiency in electricity distribution grids and harvesting energy savings from field operations.

Row 16

(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

0

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

0

(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

R&D Platform Phase-2 / Argenerji PRO (Phase-3): Builds a sustainable joint R&D ecosystem and management structure among electricity distribution companies.

Row 17

(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

0

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

0

(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

Domestic Energy – Domestic Technology Project: Aims to expand the use of domestically produced hardware and software technologies in electricity distribution networks.

Row 18

(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

3

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

97493

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

0

(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

Earthquake and Natural Disaster Performance Analysis Project: Evaluates the resilience of electricity distribution grids to potential earthquakes and develops emergency action plans.

Row 19

(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

0

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

171800

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

0

(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

Next-Generation Grid Design Project: Designs smart, flexible, modular, and renewable-ready distribution grid architectures.

Row 20

(5.5.7.1) Technology area

Select from:

☒ Smart grid integration

(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

3

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

98241

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

0

(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

Partial Discharge Detection via RF Emissions: Uses radio frequency-based monitoring systems to detect early faults in high-voltage equipment.

Row 21

(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

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

211056

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

0

(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*ArcOS: A sensor-based monitoring and protection system that increases worker safety against arc flash hazards during maintenance and operation.***Row 22****(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**

0

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

0

(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

Argenerji PRO (Phase-3): Builds a sustainable joint R&D ecosystem and management structure among electricity distribution companies.

Row 23

(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

1

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

118875

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

0

(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

Digital Maturity Assessment Model and Roadmap Project: Evaluates the digital maturity level of organizations and creates a structured roadmap for their digital transformation.

Row 24

(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

0

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

66956

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

0

(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

DÖMI (National Processor for Distribution): Develops a domestically designed and manufactured microprocessor specifically for electricity distribution equipment.

Row 25

(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

0

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

18449

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

0

(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

DTR-SAFE Project: Designs and develops a portable test device for detecting faults in the primary and secondary windings of distribution transformers.

Row 26

(5.5.7.1) Technology area

Select from:

☒ Smart grid integration

(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

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

3205500

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

0

(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

Remote Safe Activation System for Rural Street Lighting Project: Enables secure and remote activation of street lighting units in rural and remote areas.

Row 27**(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

1

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

63005

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

0

(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

Noca Platform No-Code Application Development Platform Project: Provides a no-code platform that allows rapid application development without programming skills.

Row 28

(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

1

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

155568

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

0

(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

MASS-Integrated Independent PLC and RF Communication Protocol and Product Development Project: Develops programmable logic controllers and RF-based communication protocols integrated with the MASS standard for field devices.

Row 29

(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

1

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

232764

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

0

(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

Data-Centric Security and Compliance Platform Development Project: Creates a platform to ensure cybersecurity and regulatory compliance in electricity distribution operations.

Row 30

(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

1

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

54864

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

0

(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

Domestic Software Ecosystems Project: Aims to strengthen the national software ecosystem by supporting the development and integration of local software solutions.

Row 31

(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

0

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

167981

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

0

(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

E-Mobility Initiative (Preparing Turkey's Electricity Infrastructure for the E-Mobility Transformation) Project: Prepares the electricity distribution infrastructure and capacity planning for the widespread adoption of electric vehicles.

Row 32

(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

1

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

512888

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

0

(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

Spatial Load Forecasting (SLF) Software Project: Develops a geospatial software tool to forecast electricity demand based on spatial and demographic data.

Row 33

(5.5.7.1) Technology area

Select from:

☒ Battery storage

(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

5

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

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

0

(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

E-Depo: Energy Storage Systems Monitoring Portal Project: Builds a digital platform to track the installation, integration, and operation of energy storage systems in the grid.

Row 34**(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

7

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

3836390

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

0

(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

MASS Protocol-Based Data Collection, Processing and On-Site Evaluation from Substation/Distribution Station Devices R&D Project: Creates a system for collecting, analyzing, and evaluating field device data using the MASS communication protocol.

Row 35

(5.5.7.1) Technology area

Select from:

☒ Smart grid integration

(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

13

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

7286551

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

37

(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

Şimşek (GIS) Project: A Geographic Information System that provides a digital twin of all assets and infrastructure in the electricity distribution network.

Row 36

(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

1

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

494268

(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

Quanteeflex Project: An AI-based planning tool that allocates and optimizes flexibility services in electricity grids.

Row 37

(5.5.7.1) Technology area

Select from:

☒ Smart grid integration

(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

0

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

82268

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

15

(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

Blokport Asset Management Project: A digital platform for managing the entire lifecycle and performance of electricity distribution assets.

Row 38

(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

1

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

334793

(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

IEC 61850 Project: Implements the IEC 61850 international communication standard to enable seamless interoperability between intelligent devices in substations.

Row 39

(5.5.7.1) Technology area

Select from:

☒ Smart grid integration

(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

4

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

2106122

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

22

(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

E-Keys (OMS) Project: An outage management system for recording, managing, and analyzing power interruptions and network restoration.

Row 40

(5.5.7.1) Technology area

Select from:

☒ Smart grid integration

(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

17

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

9378205

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

19

(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

ITSM (Information Technology Service Management) Project: Establishes a system to manage, monitor, and continuously improve IT service processes.

Row 41

(5.5.7.1) Technology area

Select from:

☒ Smart grid integration

(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

3

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

1820003

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

2

(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

SFRA-Based Transformer Fault Detection Device Development Project: Designs a portable device that uses Sweep Frequency Response Analysis (SFRA) to detect transformer faults.

Row 42

(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

0

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

134083

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

0

(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

Domestic Software Ecosystem Software Quality Management and Certification Project: Establishes quality assurance and certification frameworks for locally developed software products in the energy sector.

Row 43

(5.5.7.1) Technology area

Select from:

☒ Smart grid integration

(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

5

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

1655587

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

0.5

(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

Within the scope of the DEEPLIGHT Project, supported in 2022 under the European Union ERANET – Geothermica call and planned to run for 36 months, the objective is to develop an Electric Drilling System for geothermal applications. The project aims to overcome the limitations and challenges currently faced in geothermal drilling processes while achieving cost advantages. Through this initiative, it will be possible to replace conventional fuel-based drilling systems with electrically powered systems. This transition is expected to have a positive impact on the reduction of carbon emissions. Project will be completed in 2025.

[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

Lignite

(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

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

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

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

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

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

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

Geothermal

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

642664999

(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

59.3

(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

57

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

(5.7.5) Explain your CAPEX calculations, including any assumptions

CAPEX calculations included expenditures related to project development, project planning, and equipment procurement activities, based on the estimated costs of these components.

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

5659724

(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

0.45

(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

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

2008

(5.7.5) Explain your CAPEX calculations, including any assumptions

CAPEX calculations included expenditures related to project development, project planning, and equipment procurement activities, based on the estimated costs of these components.

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

1

(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

43

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

2013

(5.7.5) Explain your CAPEX calculations, including any assumptions

CAPEX calculations included expenditures related to project development, project planning, and equipment procurement activities, based on the estimated costs of these components.

Solar

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

400282000

(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

40

(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

CAPEX calculations included expenditures related to project development, project planning, and equipment procurement activities, based on the estimated costs of these components.

Marine

(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

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

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

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

[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

Renewable energy business (large-scale storage hybrid PPs, Wind, Solar, Geothermal PPs)

(5.7.1.3) CAPEX planned for product/service

1586707004

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

30

(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

Electricity distribution business

(5.7.1.3) CAPEX planned for product/service

3496279694

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

70

(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

Demand-side efficiency business (EV charging network and solar smart grid equipment sales)

(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)

0

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

0

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

1

(5.9.5) Please explain

The ingredients of the water security are monitored seriously and carefully. In case of the emergence of any variations than expected in follow-up findings, our operation team is assigned to immediately intervene in the situation. The laboratory (TSS, BOD, COD) test costs added as anticipated trend for OPEX.

[Fixed row]

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

	Use of internal pricing of environmental externalities	Environmental externality priced
	<i>Select from:</i> <input checked="" type="checkbox"/> Yes	<i>Select all that apply</i> <input checked="" type="checkbox"/> Carbon

[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

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

(5.10.1.3) Factors considered when determining the price

Select all that apply

- | | |
|--|---|
| <input checked="" type="checkbox"/> Scenario analysis | <input checked="" type="checkbox"/> Price/cost of renewable energy procurement |
| <input checked="" type="checkbox"/> Benchmarking against peers | <input checked="" type="checkbox"/> Price/cost of voluntary carbon offset credits |

- ☑ 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 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

Estimation of Carbon Costs: The shadow price of carbon is typically calculated based on the expected costs of carbon emissions over a given time horizon. This mainly involves using external carbon market prices of the EU Emissions Trading System due to the closest market system for Turkey's potential implementation. Long-term Scenario Analysis: Various future carbon price scenarios are considered to reflect regulatory changes, market developments, and global climate policies. A projected future price trajectory is used to assess the cost impact over the lifespan of projects or assets. Sector-specific Adjustments: Given the energy sector's carbon intensity, adjustments are made to reflect the specific carbon emissions from different types of energy generation (e.g., geothermal, wind, solar, or fossil-based sources). Regulatory Developments: Assumptions are made about future carbon regulations, including possible tax schemes or stricter emissions caps. Market Trends: Global and regional market prices for carbon credits or taxes are forecasted to project future pricing trends. Technological Improvements: The potential reduction in carbon emissions due to new technologies, such as CCUS is factored into price calculations. the shadow price of carbon for Zorlu Enerji is determined by considering market trends, regulatory outlooks, and sector-specific and location-based emission factors, aiming to integrate carbon costs into long-term investment and operational decisions.

(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 1 or 2)
- ☑ 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

Heavy Industries vs. Power Generation: Industries such as cement, steel, and chemical production often face higher carbon prices because they have fewer options for reducing emissions compared to the power sector, which can shift to renewable energy sources more easily. This results in varying demand for emissions allowances across sectors. Free Allocation of Allowances: Some sectors receive a portion of their allowances for free to prevent carbon leakage (the risk of companies relocating to countries with less stringent climate policies). This affects the effective carbon price paid by these sectors. Supply and Demand: The carbon price is influenced by the balance of supply and demand for emissions allowances. Factors like economic growth, energy prices, and technological advancements can impact demand for allowances, leading to price fluctuations. Market Speculation: Traders and investors participate in the carbon market, which can lead to price volatility. Speculative activities can drive prices up or down based on expectations about future regulations or economic conditions.

(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

Zorlu Enerji anticipates a continuous rise in carbon prices, potentially reaching 130 USD per metric ton of carbon by 2030. This projection is based on ongoing discussions among industry stakeholders and carbon market experts. Zorlu Enerji incorporates this upward trend in carbon pricing into its financial planning, recognizing the increasing impact of carbon pricing mechanisms. Additionally, Zorlu Enerji closely monitors the EU Emissions Trading System (ETS) market, which serves as a reference for determining the minimum and maximum carbon prices per metric ton. The maximum price of 110 USD obtained from EMBER as the EU ETS maximum price in 2022, and the actual minimum price of 70 USD, sourced from the World Bank database (https://carbonpricingdashboard.worldbank.org/map_data), representing the average carbon price in the EU ETS market, are both taken into consideration.

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

70

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

110

(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

Zorlu Enerji closely follows up on the potential impact of carbon prices aligned with the local Emissions Trading System (ETS) and also the changing market preference towards low carbon energy in its value chain where decarbonization will be a near term target as well. By internalizing carbon costs, Zorlu Enerji prioritizes investments in decarbonization projects that offer favorable payback periods and also low carbon alternatives for energy, resource, and logistics-related emissions. Zorlu Enerji also takes into account intangible costs such as reputation and market potential associated with delayed decarbonization efforts. Concrete outcomes of carbon pricing instruments guide Zorlu Enerji's financial planning, allowing the company to outline the costs of its decarbonization milestones in parallel with its commitment to Science-Based Targets (SBTs) and incorporating carbon pricing considerations into operational, capital expenditure, and R&D decisions. Zorlu Enerji extends its decarbonization approach to its shareholders, suppliers, and contractors, going beyond raising awareness within the corporate culture. The company has solidified policies on sustainable procurement and stakeholder relationships since 2021 and targets emission-free value chain in 2040. The Risk and Finance department analyzes the financial risks and opportunities arising from the climate change-driven market and regulatory context. These analyses are reported to the Sustainability Committee, led by Zorlu Enerji's CEO, and significantly impact the company's financial planning for new decarbonization investments. Zorlu Enerji's ongoing decarbonization investments and divestments exemplify the company's dedication to sustainability targets, while also providing advantages in terms of accessing capital at low interest rates for future investments.

[Add row]

(5.11) Do you engage with your value chain on environmental issues?

	Engaging with this stakeholder on environmental issues	Environmental issues covered
Suppliers	<i>Select from:</i> <input checked="" type="checkbox"/> Yes	<i>Select all that apply</i> <input checked="" type="checkbox"/> Climate change <input checked="" type="checkbox"/> Water
Customers	<i>Select from:</i> <input checked="" type="checkbox"/> Yes	<i>Select all that apply</i> <input checked="" type="checkbox"/> Climate change <input checked="" type="checkbox"/> Water
Investors and shareholders	<i>Select from:</i> <input checked="" type="checkbox"/> Yes	<i>Select all that apply</i> <input checked="" type="checkbox"/> Climate change <input checked="" type="checkbox"/> Water
Other value chain stakeholders	<i>Select from:</i> <input checked="" type="checkbox"/> Yes	<i>Select all that apply</i> <input checked="" type="checkbox"/> Climate change <input checked="" type="checkbox"/> Water

[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

- ☒ Basin/landscape condition
- ☒ Contribution to supplier-related Scope 3 emissions
- ☒ Dependence on ecosystem services/environmental assets
- ☒ Impact on plastic waste and pollution
- ☒ Impact on pollution levels

(5.11.1.3) % Tier 1 suppliers assessed

Select from:

- ☒ 1-25%

(5.11.1.4) Define a threshold for classifying suppliers as having substantive dependencies and/or impacts on the environment

- Suppliers who have been labeled as strategic and critical suppliers. (Please refer to Zorlu Enerji Sustainable Supply Chain Policy) - Suppliers operating in high-risk sectors (such as fossil fuels, mining, and agriculture) will be classified as having substantive dependencies and/or impacts if they are part of industries known for significant environmental impacts, regardless of strategic or critical attributes.

(5.11.1.5) % Tier 1 suppliers meeting the threshold for substantive dependencies and/or impacts on the environment

Select from:

- ☒ None

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 condition
- ☒ Dependence on water
- ☒ Dependence on ecosystem services/environmental assets
- ☒ Impact on water availability

(5.11.1.3) % Tier 1 suppliers assessed

Select from:

- ☒ 26-50%

(5.11.1.4) Define a threshold for classifying suppliers as having substantive dependencies and/or impacts on the environment

Suppliers are evaluated through an environmental impact assessment considering both carbon and water dimensions. Suppliers identified as having a significant carbon footprint or substantial water usage (e.g., over 10,000 cubic meters) are flagged as having a significant environmental impact. In addition, water-related risks are monitored using WWF Water Risk Filter and WRI Aqueduct tools to assess water stress conditions and identify suppliers operating in water-stressed regions.

(5.11.1.5) % Tier 1 suppliers meeting the threshold for substantive dependencies and/or impacts on the environment

Select from:

- ☒ 51-75%

(5.11.1.6) Number of Tier 1 suppliers meeting the thresholds for substantive dependencies and/or impacts on the environment

10
[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

- ☒ Regulatory compliance
- ☒ Reputation management
- ☒ Business risk mitigation
- ☒ Leverage over suppliers
- ☒ Vulnerability of suppliers
- ☒ 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

Zorlu Enerji evaluates its critical and strategic suppliers in terms of ESG criteria, which are aligned with ISO 26000, the UN Global Compact, and GRI standards. After the ESG assessment, the companies receive scorecards. These scorecards reflect evaluations based on corporate activities, environmental factors (such as water, energy, and waste management), environmental certification, social and human resources aspects, certification and regulations, stakeholder relations, public relations, and corporate governance structures and components. Based on the performance demonstrated by the companies, ESG action plans are created to address identified gaps, and this information is shared with the Procurement Directorate. Progress on these actions, as well as training and awareness sessions regarding Zorlu Enerji's expectations in terms of ESG, are conducted. Critical suppliers with climate crisis-related programs are favorably considered during tender processes.

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

- ☒ Regulatory compliance
- ☒ Reputation management
- ☒ Business risk mitigation
- ☒ Leverage over suppliers
- ☒ Vulnerability of suppliers
- ☒ 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 water

(5.11.2.4) Please explain

Zorlu Enerji prioritizes suppliers for engagement on environmental issues, including water, through a structured ESG evaluation and due diligence process aligned with the Zorlu Holding Supplier Principles and supported by the Synesgy ESG Assessment System (developed with CRIF). Suppliers are required to comply with ILO and UN conventions as well as national environmental laws and water-related regulations. Supplier performance is assessed across five categories (sustainability, environmental, social, governance, sectoral), with ESG scorecards and action plans addressing identified gaps, ensuring that supplier practices do not undermine Zorlu Enerji's sustainability reputation. Risk screening considers country, sector, and commodity specific risks. Suppliers operating in regions with high or extremely high water stress (WWF Water Risk Filter, WRI Aqueduct) are prioritized due to potential risks to supply continuity. Contractual agreements require suppliers to commit to Zorlu Holding's Code of Conduct and sustainability principles, providing leverage to enforce environmental and water management expectations. Suppliers identified deficiencies in water, energy or waste management are given targeted engagement and capacity building support. Critical suppliers are prioritized in the assessment process. ESG scorecards rank suppliers from A (Excellent) to E (Weak). Improvement action plans are developed and shared, serving as roadmaps for suppliers to close gaps.

[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

Zorlu Enerji addresses its requirements regarding issues such as climate change and water security through specifications specifically developed for contracts. These specifications are part of the agreements signed with the company awarded the tender, as a requirement of the relevant procurement process, and are signed by both parties. Zorlu Enerji reserves the right to conduct compliance audits for the supplier in line with these specifications. This process is defined under the Sustainable Supply Chain Policy.

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

Zorlu Enerji addresses its requirements regarding issues such as climate change and water security through specifications specifically developed for contracts. These specifications are part of the agreements signed with the company awarded the tender, as a requirement of the relevant procurement process, and are signed by both

parties. Zorlu Enerji reserves the right to conduct compliance audits for the supplier in line with these specifications. This process is defined under the Sustainable Supply Chain Policy.
[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

☒ Certification

☒ Geospatial monitoring tool

☒ 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:

☒ 1-25%

(5.11.6.4) % tier 1 suppliers by procurement spend in compliance with this environmental requirement

Select from:

☒ Less than 1%

(5.11.6.7) % tier 1 supplier-related scope 3 emissions attributable to the suppliers required to comply with this environmental requirement

Select from:

☒ 1-25%

(5.11.6.8) % tier 1 supplier-related scope 3 emissions attributable to the suppliers in compliance with this environmental requirement

Select from:

☒ 1-25%

(5.11.6.9) Response to supplier non-compliance with this environmental requirement

Select from:

☒ Suspend and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:

☒ Less than 1%

(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
- ☒ Re-integrating suppliers back into upstream value chain based on the successful and verifiable completion of activities

(5.11.6.12) Comment

Zorlu Enerji evaluates its critical and strategic suppliers in terms of ESG criteria, which are aligned with ISO 26000, the UN Global Compact, and GRI standards. After the ESG assessment, the companies receive scorecards. These scorecards reflect evaluations based on corporate activities, environmental factors (such as water, energy, and waste management), environmental certification, social and human resources aspects, certification and regulations, stakeholder relations, public

relations, and corporate governance structures and components. Based on the performance demonstrated by the companies, ESG action plans are created to address identified gaps, and this information is shared with the Procurement Directorate. Progress on these actions, as well as training and awareness sessions regarding Zorlu Energy's expectations in terms of ESG, are conducted. Critical suppliers with climate crisis-related programs are favorably considered during tender processes.

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

- ☒ Certification
- ☒ Geospatial monitoring tool
- ☒ 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:

- ☒ None

(5.11.6.4) % tier 1 suppliers by procurement spend in compliance with this environmental requirement

Select from:

- ☒ Less than 1%

(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:

☒ Less than 1%

(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:

☒ Less than 1%

(5.11.6.9) Response to supplier non-compliance with this environmental requirement

Select from:

☒ Suspend and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:

☒ 26-50%

(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
- ☒ Re-integrating suppliers back into upstream value chain based on the successful and verifiable completion of activities

(5.11.6.12) Comment

Zorlu Enerji evaluates its critical and strategic suppliers in terms of ESG criteria, aligned with ISO 26000, the UN Global Compact and GRI standards. Following the assessments, suppliers receive scorecards covering corporate activities, environmental factors (water, energy, waste mgmt.), certifications, human resources, stakeholder relations and governance. Based on results, ESG action plans are created and shared with the Procurement Directorate. Progress is monitored and training sessions are held to raise awareness of Zorlu Enerji's ESG expectations. Suppliers with climate crisis-related programs are favorably considered in tenders. In cases of non-compliance, questionnaires are sent and action plans are developed according to responses. ESG evaluations are carried out annually with responses systematically collected. Suppliers are also expected to establish water, energy, and waste management plans aligned with Zorlu Enerji's environmental policies. If a supplier fails the ESG assessment, action plans are developed based on severity; in critical cases, business relations may be reviewed. Compliance with health and safety is a priority, and improvement plans are created to address gaps. Training and awareness programs strengthen supplier capacity and safer working

environments. Implementation of action plans, monitoring frequency and performance improvements are tracked via supplier scorecards, annual ESG assessments, and digital platforms, ensuring continuous improvement
[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:

- ☒ Adaptation to climate change

(5.11.7.3) Type and details of engagement

Capacity building

- ☒ Provide training, support and best practices on how to measure GHG emissions
- ☒ Provide training, support and best practices on how to set science-based targets
- ☒ Support suppliers to develop public time-bound action plans with clear milestones
- ☒ Provide training, support and best practices on how to mitigate environmental impact
- ☒ Support suppliers to set their own environmental commitments across their operations
- ☒ Provide training, support and best practices on how to make credible renewable energy usage claims

Information collection

- ☒ Collect climate transition plan information at least annually from suppliers
- ☒ Collect environmental risk and opportunity information at least annually from suppliers
- ☒ Collect GHG emissions data 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:

☒ 1-25%

(5.11.7.6) % of tier 1 supplier-related scope 3 emissions covered by engagement

Select from:

☒ Less than 1%

(5.11.7.9) Describe the engagement and explain the effect of your engagement on the selected environmental action

Action plans and roadmaps are communicated to critical suppliers based on identified gaps in climate-related issues. For companies that do not meet the required score, training and awareness sessions are organized. During the following year, they are re-included in the scoring system, with their progress tracked and supported to help them reach the desired level.

(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

(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 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 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:

- ☒ Less than 1%

(5.11.7.7) % tier 1 suppliers with substantive impacts and/or dependencies related to this environmental issue covered by engagement

Select from:

- ☒ 26-50%

(5.11.7.9) Describe the engagement and explain the effect of your engagement on the selected environmental action

Action plans and roadmaps are communicated to critical suppliers based on identified gaps in climate-related issues. For companies that do not meet the required score, training and awareness sessions are organized. During the following year, they are re-included in the scoring system, with their progress tracked and supported to help them reach the desired level.

(5.11.7.10) Engagement is helping your tier 1 suppliers meet an environmental requirement related to this environmental issue

Select from:

☒ No, this engagement is unrelated to meeting an environmental requirement

(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

☒ Run an engagement campaign to educate stakeholders about the environmental impacts about your products, goods and/or services

☒ Share information about your products and relevant certification schemes

- ☒ 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 in creation and review of your climate transition plan
- ☒ Collaborate with stakeholders on innovations to reduce environmental impacts in products and services
- ☒ Engage with stakeholders to advocate for policy or regulatory change
- ☒ Run a campaign to encourage innovation to reduce environmental impacts

(5.11.9.3) % of stakeholder type engaged

Select from:

- ☒ Less than 1%

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

- ☒ None

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

Customers are indirectly associated with the embedded emissions resulting from the electricity we supply. The electricity traded through OEPSAŞ and distributed via OEDAŞ is responsible for a significant portion of our Scope 3 (Fuel- and energy-related activities) emissions. Therefore, customers were identified as a relevant stakeholder group in our double materiality analysis. Engagement efforts include providing transparent emissions data, raising awareness on low-carbon electricity, and encouraging customers to choose cleaner energy options.

(5.11.9.6) Effect of engagement and measures of success

As a result of these engagement efforts, we have observed a gradual decrease in the carbon intensity of the electricity portfolio delivered to customers, driven by the increasing share of renewable energy. Customer awareness surveys show improved understanding of energy-related emissions, and the share of green electricity contracts has increased year over year. These metrics are used to assess the effectiveness of our customer engagement activities on climate-related issues.

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
- ☒ Run an engagement campaign to educate stakeholders about the environmental impacts about your products, goods and/or services
- ☒ Share information about your products and relevant certification schemes
- ☒ 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
- ☒ Encourage collaborative work in multi-stakeholder landscape towards initiatives for sustainable land-use goals
- ☒ Engage with stakeholders to advocate for policy or regulatory change

(5.11.9.3) % of stakeholder type engaged

Select from:

- ☒ Less than 1%

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

Water is a significant environmental aspect for Zorlu Enerji due to the regions affected by our hydropower plants, which are certified with ISO 14046 for our water-related targets, as well as our thermal and geothermal plants involved in our processes. As part of our strategy, we share our water impact with our customers and local stakeholders in the areas where we operate, incorporating it into our double materiality processes to include it in our strategic planning efforts.

(5.11.9.6) Effect of engagement and measures of success

We continue to reduce our water footprint through the implementation of the ISO 14046 Management System, which was developed in line with our targets to reduce water consumption, especially focusing on water use. Additionally, we leverage the Do! Project and ISO 14001 Management System practices, incorporating solution proposals from our stakeholders to further support these efforts. Within the scope of water management, we specifically monitor and report water withdrawal, water intensity, and sector-based water usage, ensuring that water-intensive suppliers and operations are evaluated separately. This approach allows us to identify areas of higher impact, prioritize actions, and develop targeted reduction strategies that strengthen our contribution to sustainable water use.

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
- ☒ Run an engagement campaign to educate stakeholders about the environmental impacts about your products, goods and/or services
- ☒ Share information about your products and relevant certification schemes
- ☒ 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 in creation and review of your climate transition plan
- ☒ Collaborate with stakeholders on innovations to reduce environmental impacts in products and services
- ☒ Engage with stakeholders to advocate for policy or regulatory change
- ☒ Run a campaign to encourage innovation to reduce environmental impacts

(5.11.9.3) % of stakeholder type engaged

Select from:

- ☒ 51-75%

(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

Our investors and shareholders are financially exposed to the emissions from our thermal-based assets in which we have equity shares but no operational control. These assets generated 1906 tons of CO2e under Scope 3, category 15 (Investments) in 2024. As they are directly linked to our financed emissions and transition risks, they were identified as a key stakeholder group in our double materiality analysis. We regularly engage with them by disclosing climate-related financial and emissions data, sharing transition plans, and incorporating their feedback into our investment strategies.

(5.11.9.6) Effect of engagement and measures of success

Through this engagement, we have observed increased investor support for our decarbonization strategy, including commitments to shift our equity portfolio towards low-carbon assets. In 2024, participation rates in our ESG briefings further increased, and climate-related disclosures are now incorporated into our regular financial reporting. These indicators are used to evaluate the effectiveness of our engagement with investors and shareholders on climate-related matters.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☒ Other value chain stakeholder, please specify :Employees, education institutions, governmental institutions, international institutions, entrepreneurs, media, NGOs

(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
- ☒ Run an engagement campaign to educate stakeholders about the environmental impacts about your products, goods and/or services
- ☒ Share information about your products and relevant certification schemes
- ☒ 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 in creation and review of your climate transition plan
- ☒ Collaborate with stakeholders on innovations to reduce environmental impacts in products and services
- ☒ Engage with stakeholders to advocate for policy or regulatory change
- ☒ Run a campaign to encourage innovation to reduce environmental impacts

(5.11.9.3) % of stakeholder type engaged

Select from:

- ☒ 76-99%

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

- ☒ None

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

We engage with employees, governmental institutions, and NGOs as they play a critical role in enabling our climate transition plan. Employees are essential for implementing low-carbon operational practices, while governmental and international institutions influence the regulatory framework for our sector. NGOs and academia provide technical expertise and collaborative platforms to accelerate decarbonization. Engagement activities include climate trainings, joint policy workshops, and participation in multi-stakeholder climate action initiatives.

(5.11.9.6) Effect of engagement and measures of success

These engagement activities have improved internal capacity for climate-related actions and helped align external stakeholders with our decarbonization strategy. In 2024, our employees received climate-related training, and new collaboration agreements were established with public institutions and NGOs to support our decarbonization efforts. Progress is measured through participation rates, number of joint projects, and integration of climate topics into institutional agendas.
[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.

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.

Plastics

(6.1.1) Consolidation approach used

Select from:

☒ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

-

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

GAZDAŞ

(7.1.1.3) Details of structural change(s), including completion dates

Completion Date: 13.02.2024 The most significant impact on emissions occurred under Scope 3, Category 11 (Use of Sold Products). As the divested entity was responsible for natural gas-based energy generation, the downstream emissions associated with the use of these energy products—especially those resulting from end-user combustion of natural gas—were notably high. The exclusion of these activities from our value chain has substantially reduced emissions reported under this category, reflecting a structural shift towards a cleaner and more sustainable energy portfolio aligned with our net-zero targets.

[Fixed row]

(7.1.2) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?

	Change(s) in methodology, boundary, and/or reporting year definition?
	<i>Select all that apply</i> <input checked="" type="checkbox"/> No

[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:

☒ No, because the impact does not meet our significance threshold

(7.1.3.3) Base year emissions recalculation policy, including significance threshold

Due to the high number of planned mergers and divestments, our organization has set a benchmark of 60% for recalculating base year emissions. As the change remained below this threshold, no recalculation has been performed. In addition, Zorlu Enerji regularly updates its strategic plans every five years.

(7.1.3.4) 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

- ☒ ISO 14064-1
- ☒ IEA CO2 Emissions from Fuel Combustion
- ☒ The Greenhouse Gas Protocol: Scope 2 Guidance
- ☒ The Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Standard
- ☒ 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories
- ☒ The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)
- ☒ Defra Environmental Reporting Guidelines: Including streamlined energy and carbon reporting guidance, 2019

(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 utilize the grid emission factor of the country in which the operation is located, in line with best practice and GHG Protocol guidance. In our market-based calculations, we account for renewable energy certificate (RECs) such as YEK-G, which we procure 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.

[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 within your selected reporting boundary which are not included in your disclosure?

Select from:

☒ No

(7.5) Provide your base year and base year emissions.

Scope 1

(7.5.1) Base year end

12/30/2021

(7.5.2) Base year emissions (metric tons CO2e)

1093383

(7.5.3) Methodological details

Zorlu Enerji is an energy company that aims to operate in different fields of the energy sector providing a global scale integrated service. Zorlu Enerji Group has lots of subsidiary companies that operate in various fields of the sector with an integrated corporate combination including electricity and steam generation and their retail, electricity sales, solar panel sales and installation, natural gas sales and distribution, construction, management, and maintenance of power plants and EV charging stations network. Therefore, the base year emissions including all related emissions in line with the GHG Protocol Corporate Standard.

Scope 2 (location-based)

(7.5.1) Base year end

12/30/2021

(7.5.2) Base year emissions (metric tons CO2e)

240699

(7.5.3) Methodological details

Zorlu Enerji is an energy company that aims to operate in different fields of the energy sector providing a global scale integrated service. Zorlu Enerji Group has lots of subsidiary companies that operate in various fields of the sector with an integrated corporate combination including electricity and steam generation and their retail,

electricity sales, solar panel sales and installation, natural gas sales and distribution, construction, management, and maintenance of power plants and EV charging stations network. Therefore, the base year emissions including all related emissions in line with the GHG Protocol Corporate Standard.

Scope 2 (market-based)

(7.5.1) Base year end

12/30/2021

(7.5.2) Base year emissions (metric tons CO₂e)

240699

(7.5.3) Methodological details

Zorlu Enerji is an energy company that aims to operate in different fields of the energy sector providing a global scale integrated service. Zorlu Enerji Group has lots of subsidiary companies that operate in various fields of the sector with an integrated corporate combination including electricity and steam generation and their retail, electricity sales, solar panel sales and installation, natural gas sales and distribution, construction, management, and maintenance of power plants and EV charging stations network. Therefore, the base year emissions including all related emissions in line with the GHG Protocol Corporate Standard.

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)

64200.95

(7.5.3) Methodological details

The emission related to the purchased good and services was calculated and verified by a third party first in 2021. Therefore, the baseline year for this category is 2021. The "DEFRA Greenhouse Gas Reporting: Conversion Factors" is used.

Scope 3 category 2: Capital goods

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

688.22

(7.5.3) Methodological details

The emission related to the capital good was calculated and verified by a third party first in 2021. Therefore, the baseline year for this category is 2021.

Scope 3 category 3: Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.5.1) Base year end

12/30/2021

(7.5.2) Base year emissions (metric tons CO2e)

3293872.05

(7.5.3) Methodological details

Fuel-and-energy-related activities include Well to tank (WTT) process emissions of consumed fuels and electricity. The emission related to this category was calculated and verified by a third party first in 2021. Therefore, the baseline year for this category is 2021.

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)

59354.85

(7.5.3) Methodological details

This category covers WTW emissions from outsourced logistics services. The emission related to this category was calculated and verified by a third party first in 2021. Therefore, the baseline year for this category is 2021.

Scope 3 category 5: Waste generated in operations

(7.5.1) Base year end

12/30/2021

(7.5.2) Base year emissions (metric tons CO₂e)

2083.36

(7.5.3) Methodological details

Emissions from waste depend on the type of waste being disposed of, and the waste diversion method. The emission related to this category was calculated and verified by a third party first in 2021. Therefore, the baseline year for this category is 2021.

Scope 3 category 6: Business travel

(7.5.1) Base year end

12/30/2021

(7.5.2) Base year emissions (metric tons CO₂e)

9673.97

(7.5.3) Methodological details

Emissions that caused by travel and short term car rentals conducted by Zorlu Enerji employees have been accounted for under business travel-related Scope 3 emissions. The emission related to this category was calculated and verified by a third party first in 2021. Therefore, the baseline year for this category is 2021.

Scope 3 category 7: Employee commuting

(7.5.1) Base year end

12/30/2021

(7.5.2) Base year emissions (metric tons CO2e)

10012.09

(7.5.3) Methodological details

Employee commuting is realized by scheduled buses and minibuses. The emission related to this category was calculated and verified by a third party first in 2021. Therefore, the baseline year for this category is 2021.

Scope 3 category 8: Upstream leased assets

(7.5.1) Base year end

12/30/2021

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

We have not used upstream leased assets in 2021.

Scope 3 category 9: Downstream transportation and distribution

(7.5.1) Base year end

12/30/2021

(7.5.2) Base year emissions (metric tons CO2e)

240.55

(7.5.3) Methodological details

-

Scope 3 category 10: Processing of sold products

(7.5.1) Base year end

12/30/2021

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

-

Scope 3 category 11: Use of sold products

(7.5.1) Base year end

12/30/2021

(7.5.2) Base year emissions (metric tons CO2e)

2571962.96

(7.5.3) Methodological details

Emissions resulting from distributed gas.

Scope 3 category 12: End of life treatment of sold products

(7.5.1) Base year end

12/30/2021

(7.5.2) Base year emissions (metric tons CO2e)

340.12

(7.5.3) Methodological details

-

Scope 3 category 13: Downstream leased assets

(7.5.1) Base year end

12/30/2021

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

We have not used downstream leased assets in 2021.

Scope 3 category 14: Franchises

(7.5.1) Base year end

12/30/2021

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

We do not have any franchises.

Scope 3 category 15: Investments

(7.5.1) Base year end

12/30/2021

(7.5.2) Base year emissions (metric tons CO2e)

520473.08

(7.5.3) Methodological details

*The calculation has been made using financial data based on the share of ownership in Israeli power plants, revenue information, and the average emission factor.
[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)

714385

(7.6.3) Methodological details

The company's carbon emissions are calculated based on the GHG Protocol methodology using the activity data × emission factor approach. For Scope 1 emissions, IPCC-based emission factors are applied. Input data is derived from meter readings and invoice records, and no assumptions have been made during the calculation process. This method has been selected for its transparency, traceability, and ability to provide consistent and comparable results over time. As it aligns with internationally recognized standards such as the GHG Protocol, CDP, SBTi, and ISO 14064

Past year 1

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

(7.6.2) End date

12/30/2023

(7.6.3) Methodological details

The company's carbon emissions are calculated based on the GHG Protocol methodology using the activity data × emission factor approach. For Scope 1 emissions, IPCC-based emission factors are applied. Input data is derived from meter readings and invoice records, and no assumptions have been made during the calculation process. This method has been selected for its transparency, traceability, and ability to provide consistent and comparable results over time. As it aligns with internationally recognized standards such as the GHG Protocol, CDP, SBTi, and ISO 14064

Past year 2**(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)**

1063478

(7.6.2) End date

12/30/2022

(7.6.3) Methodological details

The company's carbon emissions are calculated based on the GHG Protocol methodology using the activity data × emission factor approach. For Scope 1 emissions, IPCC-based emission factors are applied. Input data is derived from meter readings and invoice records, and no assumptions have been made during the calculation process. This method has been selected for its transparency, traceability, and ability to provide consistent and comparable results over time. As it aligns with internationally recognized standards such as the CDP, SBTi.

*[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)

255401

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

252576

(7.7.4) Methodological details

Our organization reports both location-based and market-based Scope 2 emissions. For both approaches, we utilize the grid emission factor of the country in which the operation is located, in line with best practice and GHG Protocol guidance. In our market-based calculations, we account for renewable energy certificates (RECs) such as YEK-G and I-REC, which we procure 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.

Past year 1

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

234906

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

234906

(7.7.3) End date

12/30/2023

(7.7.4) Methodological details

Our organization reports both location-based and market-based Scope 2 emissions. For both approaches, we utilize the grid emission factor of the country in which the operation is located, in line with best practice and GHG Protocol guidance. In our market-based calculations, we account for renewable energy certificates (RECs) such as YEK-G and I-REC, which we procure 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.

Past year 2

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

232457

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

232457

(7.7.3) End date

12/30/2022

(7.7.4) Methodological details

Our organization reports both location-based and market-based Scope 2 emissions. For both approaches, we utilize the grid emission factor of the country in which the operation is located, in line with best practice and GHG Protocol guidance. In our market-based calculations, we account for renewable energy certificates (RECs) such as YEK-G and I-REC, which we procure 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.

[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)

35123

(7.8.3) Emissions calculation methodology

Select all that apply

- ☒ Supplier-specific method
- ☒ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

8.39

(7.8.5) Please explain

It includes upstream (cradle-to-gate) emissions of purchased goods and services. The average-data method is applied according to the "GHG Protocol Technical Guidance for Calculating Scope 3 Emissions". Emissions are calculated by the data on the mass (kilograms) or other relevant units of goods purchased and multiplied by the emission factor. Emission factors are based on the "DEFRA Greenhouse Gas Reporting, Conversion Factors 2024" The emissions from the chemicals used in geothermal operations were directly obtained from the supplier.

Capital goods

(7.8.1) Evaluation status

Select from:

- ☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO₂e)

3044

(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

(7.8.5) Please explain

It includes upstream (cradle-to-gate) emissions of capital goods. The average-data method is applied according to the "GHG Protocol Technical Guidance for Calculating Scope 3 Emissions". Emissions are calculated by the data on the mass (kilograms) or other relevant units of goods purchased and multiplied by the emission factor. Emission factors are based on the "DEFRA Greenhouse Gas Reporting, Conversion Factors 2024"

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)

2420733

(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

(7.8.5) Please explain

Fuel-and-energy-related activities include Well to tank (WTT) process emissions of consumed fuels and electricity. The data is based on energy consumption that is monitored and cross-checked with the supplier invoice. The average-data method, which involves estimating emissions by using secondary (e.g., industry average) emission factors for upstream emissions per unit of consumption (e.g., kg CO₂e/kWh) is applied. The "DEFRA Greenhouse Gas Reporting: Conversion Factors" is used. The fuel consumptions are monitored through the based on invoices and measuring equipment. The data is based on energy consumption that is monitored and cross-checked with the supplier invoice. Emission factors are based on the "DEFRA Greenhouse Gas Reporting, Conversion Factors 2024."

Upstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

93

(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

100

(7.8.5) Please explain

The upstream transportation and distribution category is calculated for Lüleburgaz, Bursa, Kızıldere, and Alaşehir plants, which are in scope of ISO 14064-1 Certification. It includes the emissions from outsourced logistics services used which are not already reported in scopes 1 and 2 emissions. The emissions are calculated based on the distance-based method, which involves determining the mass and distance, then applying the appropriate mass-distance emission factor for the vehicle used according to the Greenhouse Gas Protocol -Corporate Value Chain (Scope 3) Accounting and Reporting Standard. To calculate emissions, the number of goods purchased in mass by the distance traveled in the transport leg and then multiply that by an emission factor specific to the transport mode. Because each transport mode or vehicle type has a different emission factor, the transport legs are calculated separately and total emissions aggregated. To calculate emissions, the number of goods purchased in mass by the distance traveled in the transport leg and then multiply that by an emission factor specific to the transport mode. Because each transport mode or vehicle type has a different emission factor, the transport legs are calculated separately and total emissions aggregated. The activity data which is the amount of raw materials transported is based on purchase records. Emission factors are based on the "DEFRA Greenhouse Gas Reporting, Conversion Factors 2024

Waste generated in operations

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

14

(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

(7.8.5) Please explain

The waste-type-specific method is applied which involves using emission factors for specific waste types and waste treatment methods. The emissions are calculated based on the "DEFRA Greenhouse Gas Reporting: Conversion Factors 2024"

Business travel

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

863

(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

100

(7.8.5) Please explain

The Greenhouse Gas Protocol -Corporate Value Chain (Scope 3) Accounting and Reporting Standard is used

Employee commuting

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

4733

(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

100

(7.8.5) Please explain

This category includes emissions from the transportation of employees between home to work. The distance-based method is applied which involves collecting data from employees on commuting patterns (e.g., distance traveled and mode used for commuting) and applying appropriate emission factors for the modes used. The emission factor is based on "DEFRA Greenhouse Gas Reporting: Conversion Factors 2024"

Upstream leased assets

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Please explain

Our leased assets are calculated under Scope 1 and 2 since they are under our operation control. Therefore, we don't have any emissions from upstream leased assets in the reporting year.

Downstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Please explain

Our product, electricity, is directly consumed without any processing. Therefore, we do not have scope 3 emissions to account for under this category.

Processing of sold products

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Please explain

Our product, electricity, is directly consumed without any processing. Therefore, we do not have scope 3 emissions to account for under this category.

Use of sold products

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

10431

(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

(7.8.5) Please explain

Emissions related to extraction and production of the product have already been accounted for as Scope 1 and 2 emissions. Transmission and distribution related emissions can be considered for use of sold product emissions.

End of life treatment of sold products

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Please explain

-

Downstream leased assets

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Please explain

We have not used downstream leased assets in the reporting year

Franchises

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Please explain

We do not have any franchises

Investments

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO₂e)

1906

(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

(7.8.5) Please explain

The calculation has been made using financial data based on the share of ownership in Israeli power plants, revenue information, and the average emission factor

Other (upstream)

(7.8.5) Please explain

-

Other (downstream)

(7.8.5) Please explain

-

[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

12/30/2023

(7.8.1.2) Scope 3: Purchased goods and services (metric tons CO2e)

28321

(7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

(7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

2835264

(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)

2685

(7.8.1.6) Scope 3: Waste generated in operations (metric tons CO2e)

74305

(7.8.1.7) Scope 3: Business travel (metric tons CO2e)

470

(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)

30180

(7.8.1.12) Scope 3: Use of sold products (metric tons CO2e)

2577772

(7.8.1.16) Scope 3: Investments (metric tons CO2e)

452570

(7.8.1.19) Comment

The calculations have been conducted in alignment with the GHG Protocol Scope 3 Guidance. No supplier-specific data was used; all estimations are based on secondary data sources.

[Fixed row]

(7.9) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	<i>Select from:</i> <input checked="" type="checkbox"/> Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	<i>Select from:</i> <input checked="" type="checkbox"/> Third-party verification or assurance process in place
Scope 3	<i>Select from:</i> <input checked="" type="checkbox"/> 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_311224_Signed.pdf

(7.9.1.5) Page/section reference

1-2

(7.9.1.6) Relevant standard

Select from:

☒ 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_311224_Signed.pdf

(7.9.2.6) Page/ section reference

1-2

(7.9.2.7) Relevant standard

Select from:

☒ 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

- | | |
|---|---|
| <input checked="" type="checkbox"/> Scope 3: Franchises | <input checked="" type="checkbox"/> Scope 3: Use of sold products |
| <input checked="" type="checkbox"/> Scope 3: Investments | <input checked="" type="checkbox"/> Scope 3: Upstream leased assets |
| <input checked="" type="checkbox"/> Scope 3: Capital goods | <input checked="" type="checkbox"/> Scope 3: Downstream leased assets |
| <input checked="" type="checkbox"/> Scope 3: Business travel | <input checked="" type="checkbox"/> Scope 3: Processing of sold products |
| <input checked="" type="checkbox"/> Scope 3: Employee commuting | <input checked="" type="checkbox"/> Scope 3: Purchased goods and services |
| <input checked="" type="checkbox"/> Scope 3: Waste generated in operations | |
| <input checked="" type="checkbox"/> Scope 3: End-of-life treatment of sold products | |
| <input checked="" type="checkbox"/> Scope 3: Upstream transportation and distribution | |
| <input checked="" type="checkbox"/> Scope 3: Downstream transportation and distribution | |
| <input checked="" type="checkbox"/> 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_311224_Signed.pdf

(7.9.3.6) Page/section reference

1-2

(7.9.3.7) Relevant standard

Select from:

☒ ISAE 3410

(7.9.3.8) Proportion of reported 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.

Divestment

(7.10.1.1) Change in emissions (metric tons CO₂e)

14913

(7.10.1.2) Direction of change in emissions

Select from:

☒ Decreased

(7.10.1.3) Emissions value (percentage)

1.5

(7.10.1.4) Please explain calculation

Due to the separation of GAZDAŞ, our Scope 1+2 emissions decreased by 14,913 tCO₂e (based on GAZDAŞ's 2023 emission values). When calculating the emission value, this amount was divided by our total 2023 emissions of 991,740 tons.

Change in output

(7.10.1.1) Change in emissions (metric tons CO₂e)

30258

(7.10.1.2) Direction of change in emissions

Select from:

☒ Decreased

(7.10.1.3) Emissions value (percentage)

3.05

(7.10.1.4) Please explain calculation

Due to reduced production from our geothermal facilities in the reporting year, fugitive gas emissions have decreased, resulting in a reduction of 30,258 tons in our Scope 1 emissions. Our total Scope 1+2 emissions in the previous year amounted to 991,740 tons. The emission value has been calculated by dividing the reduction achieved in geothermal emissions by the previous year's total Scope 1+2 emissions.

Change in physical operating conditions

(7.10.1.1) Change in emissions (metric tons CO₂e)

19988

(7.10.1.2) Direction of change in emissions

Select from:

☒ Increased

(7.10.1.3) Emissions value (percentage)

2.07

(7.10.1.4) Please explain calculation

One of the key reasons for the year-on-year increase in our gross global Scope 1 and 2 emissions is the rise in grid losses observed in our electricity distribution company, OEDAŞ. The increase in these losses resulted in approximately 19,888 metric tons of additional Scope 2 emissions compared to the previous reporting year.

[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) Are carbon dioxide emissions from biogenic carbon relevant to your organization?

Select from:

☒ No

(7.15) Does your organization break down its Scope 1 emissions by greenhouse gas type?

Select from:

☒ Yes

(7.15.1) Break down your total gross global Scope 1 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 CO2e)

689.47

(7.15.1.3) 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 CO2e)

24.426

(7.15.1.3) 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 CO2e)

0.466

(7.15.1.3) 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 CO2e)

0.022

(7.15.1.3) 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)

583903

(7.15.3.2) Gross Scope 1 methane emissions (metric tons CH4)

24146.8

(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)

608054

Combustion (Electric utilities)

(7.15.3.1) Gross Scope 1 CO2 emissions (metric tons CO2)

458.5

(7.15.3.2) Gross Scope 1 methane emissions (metric tons CH4)

1.5

(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)

489

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)

105109.4

(7.15.3.2) Gross Scope 1 methane emissions (metric tons CH4)

278.3

(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)

105842

(7.15.3.5) Comment

The majority of the emissions in this category result from coal combustion for steam generation, while a smaller portion originates from the use of company vehicles.

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)
Israel	0
Pakistan	78.35
Turkey	714.307

[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)

0.172

Row 3

(7.17.1.1) Business division

Administrative Operation

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

0.371

Row 4

(7.17.1.1) Business division

Geothermal Energy Operations

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

608.054

Row 5

(7.17.1.1) Business division

Hydro Energy Operations

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

0.086

Row 6

(7.17.1.1) Business division

Natural Gas Operation

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

102.747

Row 7

(7.17.1.1) Business division

Electricity Distrubition&Trade Operations

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

2.953

[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)

0.078

(7.17.2.3) Latitude

25.043613

(7.17.2.4) Longitude

67.999048

Row 3

(7.17.2.1) Facility

Ikizdere Hydro Power Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

0.012

(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)

0.01

(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)

0.022

(7.17.2.3) Latitude

39.413794

(7.17.2.4) Longitude

39.30221

Row 7

(7.17.2.1) Facility

Istanbul Headquarters

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

0.222

(7.17.2.3) Latitude

38.993661

(7.17.2.4) Longitude

26.699289

Row 8

(7.17.2.1) Facility

Gökçedağ Wind Power Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

0.094

(7.17.2.3) Latitude

37.074627

(7.17.2.4) Longitude

36.246399

Row 9

(7.17.2.1) Facility

Tercan Hydro Power Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

0.018

(7.17.2.3) Latitude

39.755985

(7.17.2.4) Longitude

40.40183

Row 10

(7.17.2.1) Facility

Çıldır Hydro Power Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

0.012

(7.17.2.3) Latitude

40.900774

(7.17.2.4) Longitude

43.328855

Row 11

(7.17.2.1) Facility

Kızıldere I-II-III Geothermal Power Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

558.42

(7.17.2.3) Latitude

37.956213

(7.17.2.4) Longitude

28.842528

Row 12

(7.17.2.1) Facility

Beyköy Hydro Power Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

0.01

(7.17.2.3) Latitude

40.073156

(7.17.2.4) Longitude

30.755448

Row 13

(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 14

(7.17.2.1) Facility

Lüleburgaz Natural Gas Power Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

102.747

(7.17.2.3) Latitude

41.4

(7.17.2.4) Longitude

27.35

Row 15

(7.17.2.1) Facility

Alaşehir Geothermal Power Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

49.634

(7.17.2.3) Latitude

38.233

(7.17.2.4) Longitude

28.261

Row 16

(7.17.2.1) Facility

OEPSAŞ

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

0.219

(7.17.2.3) Latitude

39.775254

(7.17.2.4) Longitude

30.515913

Row 17

(7.17.2.1) Facility

OEDAŞ

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

2.733

(7.17.2.3) Latitude

39.775254

(7.17.2.4) Longitude

30.515913

Row 18

(7.17.2.1) Facility

ZES

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

147.48

(7.17.2.3) Latitude

38.993661

(7.17.2.4) Longitude

26.699289

[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	<i>Stationary Combustion</i>	<i>103.14</i>
Row 2	<i>Mobile Combustion</i>	<i>3.379</i>
Row 5	<i>Fugitive Emissions</i>	<i>607.866</i>

[Add row]

(7.19) Break down your organization's total gross global Scope 1 emissions by sector production activity in metric tons CO2e.

Electric utility activities

(7.19.1) Gross Scope 1 emissions, metric tons CO2e

611268

(7.19.3) Comment

All electricity utility activities within our defined sector boundary have been reported. Office and coal related activities have been excluded from the sector boundary (coal is combusted for steam generation).

[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)

714385

(7.22.2) Scope 2, location-based emissions (metric tons CO2e)

255401

(7.22.3) Scope 2, market-based emissions (metric tons CO2e)

252576

(7.22.4) Please explain

There are no emission sources included in the CDP reporting boundary that are not part of the consolidated financial reporting boundary.

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

There are no emission sources included in the CDP reporting boundary that are not part of the consolidated financial reporting boundar
[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

(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)

2.953

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

242024

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

242.024

(7.23.1.15) Comment

Zorlu Osmangazi is a 100% subsidiary of Zorlu Enerji and fully owns OEDAŞ (electricity distribution) and OEPSAŞ (electricity retail sales). In 2023, OEDAŞ reported Scope 1 emissions of 3,726 tCO₂e and Scope 2 emissions of 218,493 tCO₂e, while OEPSAŞ recorded Scope 1 emissions of 233 tCO₂e and Scope 2 emissions of 184 tCO₂e.

Row 2

(7.23.1.1) Subsidiary name

Zorlu Yenilenebilir

(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)

608.235

(7.23.1.13) Scope 2, location-based emissions (metric tons CO₂e)

10117

(7.23.1.14) Scope 2, market-based emissions (metric tons CO₂e)

10.117

(7.23.1.15) Comment

Zorlu Yenilenebilir is a 100% subsidiary of Zorlu Enerji and operates in renewable electricity production activities (Wind, Geothermal and Hydro) in Turkey.

Row 4

(7.23.1.1) Subsidiary name

Zorlu Enerji Pakistan

(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)

0.078

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

0.239

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

0.239

(7.23.1.15) Comment

Zorlu Enerji Pakistan is a 99.99% subsidiary of Zorlu Enerji and operates in wind power production activities in Pakistan.

Row 5

(7.23.1.1) Subsidiary name

Zorlu Enerji İsrail

(7.23.1.2) Primary activity

Select from:

☒ Non-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)

0

(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

Zorlu Enerji Israel Ltd. is a 100% subsidiary of Zorlu Enerji and operates in electricity trading activities in Israel. Therefore Zorlu Enerji doesn't have any operational control on entity so emissions were included in scope 3.15 investment category.

Row 6

(7.23.1.1) Subsidiary name

ZJ Strong

(7.23.1.2) Primary activity

Select from:

☒ Solar 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)

0

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

0.013

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

0.013

(7.23.1.15) Comment

ZJ Strong is a 75% subsidiary of Zorlu Enerji and operates in solar power production activities in Palestine.

Row 7

(7.23.1.1) Subsidiary name

Zador

(7.23.1.2) Primary activity

Select from:

☒ Non-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)

0

(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

Zorlu Enerji Israel Ltd. is a 100% subsidiary of Zorlu Enerji and operates in electricity trading activities in Israel. Therefore Zorlu Enerji doesn't have any operational control on entity so emissions were included in scope 3.15 investment category.

Row 8

(7.23.1.1) Subsidiary name

Zorlu Enerji

(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)

0.103

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

0.181

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

0.181

(7.23.1.15) Comment

It includes emissions from Lüleburgaz and Bursa natural gas power plants.

[Add row]

(7.29) What percentage of your total operational spend in the reporting year was on energy?

Select from:

☒ More than 0% but less than or equal to 5%

(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: <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired electricity	Select from: <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired heat	Select from: <input checked="" type="checkbox"/> No
Consumption of purchased or acquired steam	Select from: <input checked="" type="checkbox"/> No
Consumption of purchased or acquired cooling	Select from: <input checked="" type="checkbox"/> No
Generation of electricity, heat, steam, or cooling	Select from: <input checked="" type="checkbox"/> 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

598195

(7.30.1.4) Total (renewable + non-renewable) MWh

598195.00

Consumption of purchased or acquired electricity

(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

25371

(7.30.1.4) Total (renewable + non-renewable) MWh

25371.00

Consumption of self-generated non-fuel renewable energy

(7.30.1.1) Heating value

Select from:

☒ LHV (lower heating value)

(7.30.1.2) MWh from renewable sources

402881

(7.30.1.4) Total (renewable + non-renewable) MWh

402881.00

Total energy consumption

(7.30.1.1) Heating value

Select from:

☒ LHV (lower heating value)

(7.30.1.2) MWh from renewable sources

402881

(7.30.1.3) MWh from non-renewable sources

8081

(7.30.1.4) Total (renewable + non-renewable) MWh

410962.00

[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	<i>Select from:</i> <input checked="" type="checkbox"/> Yes
Consumption of fuel for the generation of heat	<i>Select from:</i> <input checked="" type="checkbox"/> Yes
Consumption of fuel for the generation of steam	<i>Select from:</i> <input checked="" type="checkbox"/> Yes
Consumption of fuel for the generation of cooling	<i>Select from:</i> <input checked="" type="checkbox"/> No
Consumption of fuel for co-generation or tri-generation	<i>Select from:</i> <input checked="" type="checkbox"/> 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) Heating value

Select from:

☒ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.5) MWh fuel consumed for self-generation of steam

0

Other biomass

(7.30.7.1) Heating value

Select from:

☒ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.5) MWh fuel consumed for self-generation of steam

0

Other renewable fuels (e.g. renewable hydrogen)

(7.30.7.1) Heating value

Select from:

☒ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.5) MWh fuel consumed for self-generation of steam

0

Coal

(7.30.7.1) Heating value

Select from:

☒ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

581122

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.5) MWh fuel consumed for self-generation of steam

581122

(7.30.7.8) Comment

Coal

Oil

(7.30.7.1) Heating value

Select from:

☒ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

14156

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

14156

(7.30.7.5) MWh fuel consumed for self-generation of steam

0

(7.30.7.8) Comment

Diesel, Gasoline, Liquefied Petroleum Gas (LPG)

Gas

(7.30.7.1) Heating value

Select from:

☒ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

2916

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

2916

(7.30.7.5) MWh fuel consumed for self-generation of steam

0

(7.30.7.8) Comment

Natural Gas

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

(7.30.7.1) Heating value

Select from:

☒ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.5) MWh fuel consumed for self-generation of steam

0

Total fuel

(7.30.7.1) Heating value

Select from:

☒ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

598195

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

17073

(7.30.7.5) MWh fuel consumed for self-generation of steam

581122

[Fixed row]

(7.30.16) Provide a breakdown by country/area of your electricity/heat/steam/cooling consumption in the reporting year.

Israel

(7.30.16.1) Consumption of purchased electricity (MWh)

29.99

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

29.99

Pakistan

(7.30.16.1) Consumption of purchased electricity (MWh)

535.9

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

309

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

844.90

Turkey

(7.30.16.1) Consumption of purchased electricity (MWh)

24805

(7.30.16.2) Consumption of self-generated electricity (MWh)

402882

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

594969

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

1022656.00

[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/region

Select from:

☒ Turkey

(7.33.1.2) Voltage level

Select from:

☒ Distribution (low voltage)

(7.33.1.3) Annual load (GWh)

7242

(7.33.1.4) Annual energy losses (% of annual load)

6.98

(7.33.1.5) Scope where emissions from energy losses are accounted for

Select from:

☒ Scope 2 (location-based)

(7.33.1.6) Emissions from energy losses (metric tons CO2e)

242024.5

(7.33.1.7) Length of network (km)

53564

(7.33.1.8) Number of connections

3000000

(7.33.1.9) Area covered (km2)

35501

(7.33.1.10) Comment

Osmangazi Elektrik Dağıtım A.Ş. (OEDAŞ) (%100 Zorlu Enerji asset) is responsible for the electricity distribution across five provinces in Turkey: Afyonkarahisar, Bilecik, Eskişehir, Kütahya, and Uşak, covering an area of approximately 35,501 km². Serving around 3 million people, OEDAŞ plays a key role in modernizing energy infrastructure, enhancing energy efficiency, and integrating renewable energy sources. The company is actively involved in innovative projects like energy storage systems and smart grids, contributing to Turkey's green energy transition. OEDAŞ also focuses on sustainability and corporate social responsibility through various initiatives

[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

0.000033

(7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

966961

(7.45.3) Metric denominator

Select from:

☒ unit total revenue

(7.45.4) Metric denominator: Unit total

29657596

(7.45.5) Scope 2 figure used

Select from:

☒ Market-based

(7.45.6) % change from previous year

8.33

(7.45.7) Direction of change

Select from:

☒ Decreased

(7.45.8) Reasons for change

Select all that apply

☒ Divestment

☒ Change in output

(7.45.9) Please explain

In the reporting year, our Scope 1+2 emissions decreased due to two main factors. First, the divestment of GAZDAŞ resulted in a reduction of 14,913 tCO₂e (based on GAZDAŞ's 2023 emission values). Second, lower production levels at our geothermal facilities led to a decrease in fugitive gas emissions, contributing an additional reduction of 30,258 tCO₂e. Together, these factors account for the overall decrease in our Scope 1+2 emissions compared to the previous year.

[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.

Geothermal

(7.46.1) Absolute scope 1 emissions (metric tons CO2e)

608.05

(7.46.2) Emissions intensity based on gross or net electricity generation

Select from:

☒ Net

(7.46.3) Scope 1 emissions intensity (Gross generation)

0.00

(7.46.4) Scope 1 emissions intensity (Net generation)

0.39

Hydropower

(7.46.1) Absolute scope 1 emissions (metric tons CO2e)

0.09

(7.46.2) Emissions intensity based on gross or net electricity generation

Select from:

☒ Net

(7.46.3) Scope 1 emissions intensity (Gross generation)

0.00

(7.46.4) Scope 1 emissions intensity (Net generation)

0.00

Wind

(7.46.1) Absolute scope 1 emissions (metric tons CO2e)

0.15

(7.46.2) Emissions intensity based on gross or net electricity generation

Select from:

☒ Net

(7.46.3) Scope 1 emissions intensity (Gross generation)

0.00

(7.46.4) Scope 1 emissions intensity (Net generation)

0.00

Solar

(7.46.1) Absolute scope 1 emissions (metric tons CO2e)

0

(7.46.2) Emissions intensity based on gross or net electricity generation

Select from:

☒ Net

(7.46.3) Scope 1 emissions intensity (Gross generation)

0.00

(7.46.4) Scope 1 emissions intensity (Net generation)

0.00

Total

(7.46.1) Absolute scope 1 emissions (metric tons CO2e)

608.29

(7.46.2) Emissions intensity based on gross or net electricity generation

Select from:

☒ Net

(7.46.4) Scope 1 emissions intensity (Net generation)

0.26

[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

0.23

(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

4.17

(7.52.6) Direction of change

Select from:

☒ Decreased

(7.52.7) Please explain

In order to achieve the target, we have implemented rooftop and ground-mounted solar power plant (SPP) investments and are progressing towards increasing their installed capacities.

Row 2

(7.52.1) Description

Select from:

☒ Waste

(7.52.2) Metric value

99.91

(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

5.17

(7.52.6) Direction of change

Select from:

☒ Increased

(7.52.7) Please explain

A target has been set to reduce the total amount of waste, hazardous waste, and ash waste by 10% annually. Kars Çıldır HEPP and OEDAŞ operations have been awarded the Zero Waste Certificate. Ash waste generated in thermal power plants is directed to the cement sector as raw material, while metal and electronic waste is recycled and reintroduced into the economy. The lifespan of energy infrastructures is extended through electrical panel and wind turbine maintenance workshops. EOLIAN Project: Wind turbine blades are recycled and reused. JIDEP Project: Circular economy practices are being developed through the recycling of composite materials, reducing the need for raw materials. Investments in waste management and battery recycling within charging infrastructure are being increased.

[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

05/20/2024

(7.53.1.6) Target coverage

Select from:

☒ Business activity

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

☒ Carbon dioxide (CO₂)

☒ Methane (CH₄)

☒ Nitrous oxide (N₂O)

☒ Hydrofluorocarbons (HFCs)

(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

12/30/2021

(7.53.1.13) Base year Scope 2 emissions covered by target (metric tons CO2e)

240009

(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)

240009.000

(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

12/30/2030

(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)

139205.220

(7.53.1.58) Scope 2 emissions in reporting year covered by target (metric tons CO2e)

255401

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

255401.000

(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

-15.27

(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

In this context, our distribution company OEDAŞ has implemented the FlexiGrid Project, designed to enhance flexibility in next-generation distribution networks. Through the integration of distributed energy resources, energy storage systems, and Vehicle-to-Grid (V2G) technology, we are building a transparent data management infrastructure powered by digital smart grid solutions, IoT, and Blockchain. In Eskişehir, V2G-compatible charging stations and battery storage systems have been deployed, strengthening our energy ecosystem with greater flexibility and efficiency.

(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

05/20/2024

(7.53.1.6) Target coverage

Select from:

☒ Business activity

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

☒ Carbon dioxide (CO2)

☒ Methane (CH4)

☒ Nitrous oxide (N2O)

☒ Hydrofluorocarbons (HFCs)

(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

12/30/2021

(7.53.1.13) Base year Scope 2 emissions covered by target (metric tons CO2e)

240009

(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)

240009.000

(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

12/30/2040

(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)

24000.900

(7.53.1.58) Scope 2 emissions in reporting year covered by target (metric tons CO2e)

255401

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

255401.000

(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

-7.13

(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

In this context, our distribution company OEDAŞ has implemented the FlexiGrid Project, designed to enhance flexibility in next-generation distribution networks. Through the integration of distributed energy resources, energy storage systems, and Vehicle-to-Grid (V2G) technology, we are building a transparent data management infrastructure powered by digital smart grid solutions, IoT, and Blockchain. In Eskişehir, V2G-compatible charging stations and battery storage systems have been deployed, strengthening our energy ecosystem with greater flexibility and efficiency.

(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:

☒ 1.5°C aligned

(7.53.1.5) Date target was set

05/20/2024

(7.53.1.6) Target coverage

Select from:

☒ Business activity

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

☒ Carbon dioxide (CO2)

☒ Methane (CH4)

- ☒ Nitrous oxide (N2O)
- ☒ Hydrofluorocarbons (HFCs)

(7.53.1.8) Scopes

Select all that apply

- ☒ Scope 3

(7.53.1.10) Scope 3 categories

Select all that apply

- | | |
|---|--|
| <input checked="" type="checkbox"/> Scope 3, Category 15 – Investments | <input checked="" type="checkbox"/> Scope 3, Category 1 – Purchased goods and services |
| <input checked="" type="checkbox"/> Scope 3, Category 2 – Capital goods | <input checked="" type="checkbox"/> Scope 3, Category 5 – Waste generated in operations |
| <input checked="" type="checkbox"/> Scope 3, Category 6 – Business travel | <input checked="" type="checkbox"/> Scope 3, Category 12 – End-of-life treatment of sold products |
| <input checked="" type="checkbox"/> Scope 3, Category 7 – Employee commuting | <input checked="" type="checkbox"/> Scope 3, Category 4 – Upstream transportation and distribution |
| <input checked="" type="checkbox"/> Scope 3, Category 11 – Use of sold products | <input checked="" type="checkbox"/> Scope 3, Category 9 – Downstream transportation and distribution |
| <input checked="" type="checkbox"/> 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

12/30/2021

(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

12/30/2030

(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)

35123

(7.53.1.60) Scope 3, Category 2: Capital goods emissions in reporting year covered by target (metric tons CO2e)

3044

(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)

51320

(7.53.1.62) Scope 3, Category 4: Upstream transportation and distribution emissions in reporting year covered by target (metric tons CO2e)

93

(7.53.1.63) Scope 3, Category 5: Waste generated in operations emissions in reporting year covered by target (metric tons CO2e)

14

(7.53.1.64) Scope 3, Category 6: Business travel emissions in reporting year covered by target (metric tons CO2e)

863

(7.53.1.65) Scope 3, Category 7: Employee commuting emissions in reporting year covered by target (metric tons CO2e)

4733

(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)

10431

(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)

1906

(7.53.1.76) Total Scope 3 emissions in reporting year covered by target (metric tons CO2e)

107527.000

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

107527.000

(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

341.47

(7.53.1.80) Target status in reporting year

Select from:

☒ Achieved

(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 only excluded category is Scope 3.3 (%97.88 of excluded), for which the company has set a separate SBTi 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.

(7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

☒ No

(7.53.1.86) List the emissions reduction initiatives which contributed most to achieving this target

Supplier Selection with Environmental Criteria Prioritizing suppliers with low-carbon production, high energy efficiency, and sustainable practices; improving coal quality to enhance efficiency and reduce Scope 3 emissions. Logistics Optimization Reducing transport emissions by shifting from road to Ro-Ro and rail, optimizing routes, and minimizing fuel consumption. Circular Waste Management Implementing waste reduction, recovery, and reuse practices to cut resource use and lower supply chain emissions. Cleaner Grid with Zes Solar Partnering with Zes Solar to integrate solar panels into grids, lowering emission factors and providing customers with lower-carbon electricity. Employee Commuting Optimization Supporting shuttle use with optimized routes and hybrid work models to reduce commuting-related emissions. Exit from Thermal Operations Ending Israeli thermal investments, reducing emissions in Scope 3.15 (Investments). Green Cement Procurement Ensuring the use of low-emission green cement in new investments and construction projects.

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

05/11/2024

(7.53.1.6) Target coverage

Select from:

- ☒ Business activity

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

- ☒ Carbon dioxide (CO2)
- ☒ Methane (CH4)
- ☒ Nitrous oxide (N2O)
- ☒ Hydrofluorocarbons (HFCs)

(7.53.1.8) Scopes

Select all that apply

- ☒ Scope 3

(7.53.1.10) Scope 3 categories

Select all that apply

- | | |
|---|--|
| <input checked="" type="checkbox"/> Scope 3, Category 15 – Investments | <input checked="" type="checkbox"/> Scope 3, Category 1 – Purchased goods and services |
| <input checked="" type="checkbox"/> Scope 3, Category 2 – Capital goods | <input checked="" type="checkbox"/> Scope 3, Category 5 – Waste generated in operations |
| <input checked="" type="checkbox"/> Scope 3, Category 6 – Business travel | <input checked="" type="checkbox"/> Scope 3, Category 12 – End-of-life treatment of sold products |
| <input checked="" type="checkbox"/> Scope 3, Category 7 – Employee commuting | <input checked="" type="checkbox"/> Scope 3, Category 4 – Upstream transportation and distribution |
| <input checked="" type="checkbox"/> Scope 3, Category 11 – Use of sold products | <input checked="" type="checkbox"/> Scope 3, Category 9 – Downstream transportation and distribution |
| <input checked="" type="checkbox"/> 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

12/30/2021

(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

12/30/2040

(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)

35123

(7.53.1.60) Scope 3, Category 2: Capital goods emissions in reporting year covered by target (metric tons CO2e)

3044

(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)

51320

(7.53.1.62) Scope 3, Category 4: Upstream transportation and distribution emissions in reporting year covered by target (metric tons CO2e)

93

(7.53.1.63) Scope 3, Category 5: Waste generated in operations emissions in reporting year covered by target (metric tons CO2e)

14

(7.53.1.64) Scope 3, Category 6: Business travel emissions in reporting year covered by target (metric tons CO2e)

863

(7.53.1.65) Scope 3, Category 7: Employee commuting emissions in reporting year covered by target (metric tons CO2e)

4733

(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)

10431

(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)

1906

(7.53.1.76) Total Scope 3 emissions in reporting year covered by target (metric tons CO2e)

107527.000

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

107527.000

(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

94.85

(7.53.1.80) Target status in reporting year

Select from:

☒ Achieved

(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 only excluded category is Scope 3.3 (%97.88 of excluded), for which the company has set a separate SBTi 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.

(7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

☒ No

(7.53.1.86) List the emissions reduction initiatives which contributed most to achieving this target

Supplier Selection with Environmental Criteria Prioritizing suppliers with low-carbon production, high energy efficiency, and sustainable practices; improving coal quality to enhance efficiency and reduce Scope 3 emissions. Logistics Optimization Reducing transport emissions by shifting from road to Ro-Ro and rail, optimizing routes, and minimizing fuel consumption. Circular Waste Management Implementing waste reduction, recovery, and reuse practices to cut resource use and lower supply chain emissions. Cleaner Grid with Zes Solar Partnering with Zes Solar to integrate solar panels into grids, lowering emission factors and providing customers with lower-carbon electricity. Employee Commuting Optimization Supporting shuttle use with optimized routes and hybrid work models to reduce commuting-related emissions. Exit from Thermal Operations Ending Israeli thermal investments, reducing emissions in Scope 3.15 (Investments). Green Cement Procurement Ensuring the use of low-emission green cement in new investments and construction projects.

[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

05/20/2024

(7.53.2.6) Target coverage

Select from:

☒ Business activity

(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

12/30/2021

(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

12/30/2030

(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

57.5

(7.53.2.60) Intensity figure in reporting year for Scope 1

0.264

(7.53.2.80) Intensity figure in reporting year for all selected Scopes

0.2640000000

(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

46.57

(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 key action to achieve this target is the implementation of the GECO (Geothermal Emission Control) Project, aimed at significantly reducing Scope 1 emissions from geothermal power generation while maintaining reservoir pressure to enhance production efficiency. As the only site in Türkiye selected for this project, the Kızıldere Geothermal Power Plant has successfully reinjected approximately 1,000 tons of non-condensable gases back into the reservoir instead of releasing them into the atmosphere. This pilot-stage initiative represents a critical step in our vision to make geothermal energy a greener energy source. Feasibility studies are currently ongoing to scale up the system for full deployment, and it remains our most important action for achieving our emission reduction goals. By the end of the reporting year, we have achieved approximately 46% of our overall target.

(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

05/20/2024

(7.53.2.6) Target coverage

Select from:

☒ Business activity

(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

12/30/2021

(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

12/30/2040

(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

79.8

(7.53.2.60) Intensity figure in reporting year for Scope 1

0.264

(7.53.2.80) Intensity figure in reporting year for all selected Scopes

0.2640000000

(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

35.14

(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 key action to achieve this target is the implementation of the GECO (Geothermal Emission Control) Project, aimed at significantly reducing Scope 1 emissions from geothermal power generation while maintaining reservoir pressure to enhance production efficiency. As the only site in Türkiye selected for this project, the Kızıldere Geothermal Power Plant has successfully reinjected approximately 1,000 tons of non-condensable gases back into the reservoir instead of releasing them into the atmosphere. This pilot-stage initiative represents a critical step in our vision to make geothermal energy a greener energy source. Feasibility studies are currently ongoing to scale up the system for full deployment, and it remains our most important action for achieving our emission reduction goals. By the end of the reporting year, we have achieved approximately 35% of our overall target.

(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

05/20/2024

(7.53.2.6) Target coverage

Select from:

- ☒ Business activity

(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

12/30/2021

(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

(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

12/30/2030

(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

57.5

(7.53.2.59) % change anticipated in absolute Scope 3 emissions

(7.53.2.60) Intensity figure in reporting year for Scope 1

0.102

(7.53.2.64) Intensity figure in reporting year for Scope 3, Category 3: Fuel- and energy-related activities

0.347

(7.53.2.79) Intensity figure in reporting year for total Scope 3

0.3470000000

(7.53.2.80) Intensity figure in reporting year for all selected Scopes

0.4490000000

(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**

-6.99

(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 key action to achieve this target is the implementation of the GECO (Geothermal Emission Control) Project, aimed at significantly reducing Scope 1 emissions from geothermal power generation while maintaining reservoir pressure to enhance production efficiency. As the only site in Türkiye selected for this project, the Kızıldere Geothermal Power Plant has successfully reinjected approximately 1,000 tons of non-condensable gases back into the reservoir instead of releasing them into the atmosphere. This pilot-stage initiative represents a critical step in our vision to make geothermal energy a greener energy source. Feasibility studies are currently ongoing to scale up the system for full deployment, and it remains our most important action for achieving our emission reduction goals. We anticipate that the reduction of our Scope 3.3 emissions will primarily result from the gradual decarbonization of Türkiye's grid emission factor over the years. In this context, we are also carrying out initiatives aimed at reducing grid losses. Although an increase was observed in the intensity target during the reporting year, we plan to achieve a reduction in the coming years through the implementation of our emission reduction projects.

(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

05/20/2024

(7.53.2.6) Target coverage

Select from:

☒ Business activity

(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

12/30/2021

(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

12/30/2040

(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

79.8

(7.53.2.59) % change anticipated in absolute Scope 3 emissions

98

(7.53.2.60) Intensity figure in reporting year for Scope 1

0.102

(7.53.2.64) Intensity figure in reporting year for Scope 3, Category 3: Fuel- and energy-related activities

0.347

(7.53.2.79) Intensity figure in reporting year for total Scope 3

0.3470000000

(7.53.2.80) Intensity figure in reporting year for all selected Scopes

0.4490000000

(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

-5.27

(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 key action to achieve this target is the implementation of the GECO (Geothermal Emission Control) Project, aimed at significantly reducing Scope 1 emissions from geothermal power generation while maintaining reservoir pressure to enhance production efficiency. As the only site in Türkiye selected for this project, the Kızıldere Geothermal Power Plant has successfully reinjected approximately 1,000 tons of non-condensable gases back into the reservoir instead of releasing them into the atmosphere. This pilot-stage initiative represents a critical step in our vision to make geothermal energy a greener energy source. Feasibility studies are currently ongoing to scale up the system for full deployment, and it remains our most important action for achieving our emission reduction goals. We anticipate that the reduction of our Scope 3.3 emissions will primarily result from the gradual decarbonization of Türkiye's grid emission factor over the years. In this context, we are also carrying out initiatives aimed at reducing grid losses. Although an increase was observed in the intensity target during the reporting year, we plan to achieve a reduction in the coming years through the implementation of our emission reduction projects.

(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

12/30/2020

(7.54.1.8) Consumption or production of selected energy carrier in base year (MWh)

(7.54.1.9) % share of low-carbon or renewable energy in base year

87

(7.54.1.10) End date of target

12/30/2030

(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?**

It is related to our absolute targets. By 2030, we aim to generate all of our electricity production in Turkey from renewable energy sources and to invest in the protection and improvement of biodiversity. In the fight against the climate crisis, we aim to reduce the carbon emissions from our operations to net-zero by 2030 and to create long-term positive value by working towards a net-zero emission target in our entire value chain by 2040.

(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 company-wide and covers all our operations.

(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

The company has exited from its natural gas portfolio as part of its decarbonization strategy.

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:

☒ Business division

(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

12/30/2020

(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

12/30/2030

(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

23

(7.54.1.13) % of target achieved relative to base year

(7.54.1.14) Target status in reporting year*Select from:*☒ Underway**(7.54.1.16) Is this target part of an emissions target?***No, it comes from general performance of company***(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 company-wide and covers all our operations.***(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***R&D Projects are going to be paced and low carbon based investments as ZES and Electrip are going to increase rapidly. R&D Projects, ZES, Electrip investments and additional capacity extension projects for WPP and hybrid extension SPP projects for GPP. Also ISO 50001 Energy Management System configuration works are going to be implemented due to legal requirements for Kızıldere GPP. Existing wind, geothermal, and hydroelectric power plants will be able to install solar panels and generate electricity from solar energy according to the "Procedures and Principles Regarding the Regulation of Power Plant Sites of Generation Plants Subject to Pre-Licenses or Licenses in the Electricity Market" published by EMRA and entered into force in June 2020. We aim to meet the internal consumption of our existing power plants and benefit more from renewable sources with the establishment of hybrid plants**[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

12/31/2020

(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

☒ Int2

☒ Abs2

☒ Int3

☒ Abs3

☒ Int4

☒ Abs4

☒ Int1

(7.54.3.5) End date of target for achieving net zero

12/30/2040

(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

ZE set long term sustainability targets in 2020 which includes Net Zero Target by 2030. It is aimed to be Net Zero in Scope 1 and Scope 2 emissions by 2030 and across the entire value chain (Scope 1, 2, and 3) by 2040. The target coverage is organization-wide, in line with the company's defined reporting boundary.

(7.54.3.11) Target objective

By 2030, we aim to generate all of our electricity production in Turkey from renewable energy sources and to invest in the protection and improvement of biodiversity. In the fight against the climate crisis, we aim to reduce the carbon emissions from our operations to net-zero target in our entire value chain by 2040. As a company that generates electricity and provides it to consumers, Zorlu Enerji is committed to supplying its entire power generation from renewables by 2030, striving to facilitate not only its own operations but also the carbon-free growth of its clients. Zorlu Enerji aims to further increase the share of renewables in its generation portfolio, especially geothermal and solar energy, and to develop its resource diversity. Zorlu Enerji continues to engage in activities in line with the principle of developing generation capacity by supporting Turkey's clean energy supply. Our application for a license amendment for the 3.58 MWp solar power plant which we will establish in integration with our Alaşehir Geothermal Power Plant was approved in 2021. Thanks to this project developed as a result of comprehensive R&D activities carried out for long years, we became a role model once again for the industry by introducing to Turkey the integrated plant model, which is becoming

widespread across the world and where geothermal and solar power plants are used in a hybrid form. In the upcoming period, we plan to apply the integrated plant model, in which geothermal and solar power is used in a hybrid form, to our Kızildere Geothermal Power Plants and Gökçedağ Wind Power Plant.

(7.54.3.12) Do you intend to neutralize any residual emissions with permanent carbon removals at the end of the target?

Select from:

☒ No

(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

☒ No, we do not plan to purchase and cancel carbon credits for neutralization and/or beyond value chain mitigation

(7.54.3.16) Describe the actions to mitigate emissions beyond your value chain

Supplier Selection with Environmental Criteria Prioritizing suppliers with low-carbon production, high energy efficiency, and sustainable practices; improving coal quality to enhance efficiency and reduce Scope 3 emissions. Logistics Optimization Reducing transport emissions by shifting from road to Ro-Ro and rail, optimizing routes, and minimizing fuel consumption. Circular Waste Management Implementing waste reduction, recovery, and reuse practices to cut resource use and lower supply chain emissions. Cleaner Grid with Zes Solar Partnering with Zes Solar to integrate solar panels into grids, lowering emission factors and providing customers with lower-carbon electricity. Employee Commuting Optimization Supporting shuttle use with optimized routes and hybrid work models to reduce commuting-related emissions. Exit from Thermal Operations Ending Israeli thermal investments, reducing emissions in Scope 3.15 (Investments). Green Cement Procurement Ensuring the use of low-emission green cement in new investments and construction projects.

(7.54.3.17) Target status in reporting year

Select from:

☒ Underway

(7.54.3.19) Process for reviewing target

Our net-zero target is reviewed on an annual basis in line with our verified GHG emissions inventory. Each year, emissions are calculated and progress towards the target is monitored. In addition, our overall climate strategy, including the net-zero target and associated milestones, is comprehensively reviewed every five years to ensure alignment with the latest scientific guidance, regulatory developments, and market dynamics.

[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.

Select from:

☒ Yes

(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	2	`Numeric input
To be implemented	1	240
Implementation commenced	2	1240
Implemented	1	1087
Not to be implemented	0	`Numeric input

[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

Energy efficiency in production processes

☒ Smart control system

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

1087

(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:

☒ Mandatory

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☒ 16-20 years

(7.55.2.9) Comment

The achieved benefits represent the avoided emissions from the kilometers not driven thanks to SCADA-enabled remote operation and fault response capabilities. Due to economic uncertainties, financial data could not be provided. This investment is mandatory as it is driven by government policy requirements.

Row 2

(7.55.2.1) Initiative category & Initiative type

Fugitive emissions reductions

☒ Carbon capture and storage/utilization (CCS/U)

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

156103

(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

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

3500000000

(7.55.2.7) Payback period

Select from:

☒ 4-10 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☒ 1-2 years

(7.55.2.9) Comment

We are conducting studies on the capture and underground storage of emissions from geothermal sources within the framework of the project initiated in cooperation with international institutions and organizations under the EU Horizon 2020 program. The pilot carbon capture and storage plant was established at the Kızıldere III Geothermal Power Plant with studies on capture and storage were initiated. We expect the final report of the project to be published soon and we will be part of an important step to combat the climate crisis by reducing emissions from geothermal power plants in our country. Due to financial uncertainties and the volatility of carbon prices, it was not possible to provide reliable financial data.

[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 regulatory 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 Project The 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 Project The 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 Kizildere 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 has a budget to develop emission reduction units as an asset. It is the approval for the project that shows the magnitude of the emission reduction provided. We have received the “Gold Standard” certificate for our Gökçedağ Wind Energy Power Plant. Within the scope of Gokcedag WPP 6th Verification, 213,000 ton CO2 certification approval was received.

Row 4

(7.55.3.1) Method

Select from:

☒ Dedicated budget for low-carbon product R&D

(7.55.3.2) Comment

We invest in national, renewable, and clean energy to reduce Turkey’s dependency on energy imports. We ensure sustainability and security in energy supply through our balanced portfolio. On the back of our innovation and R&D activities that shape the sector, we invest in the development and operation of smart systems. Charging Stations: This project aims to analyze the impact of the increasing number of electric vehicles and charging stations on the electricity transmission network and minimize the impact of charging devices on the electrical grid as well as develop innovative and value-added applications that will help increase customer satisfaction. Electricity Storage: The project aims to integrate storage systems for different purposes and with different configurations and capacities to the distribution grid, ensure that these systems are operated in accordance with their objectives, and to compare the applications. Within the scope of this project, a proposal document will also be prepared to help draft new legislation. GECO Project: GECO (Geothermal Gas Emission Control) Project, aims to conduct international field applications, test new equipment and technologies, and enable the transfer of know-how and experience in order to reduce carbon dioxide (CO2) emissions from

geothermal energy in line with the goals set forth in “Reducing the Costs of Electricity Generation from Renewable Energy Sources” in the Horizon 2020 program. The 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 make major discoveries, creative ideas and inventions from the laboratory to the world markets to create a more sustainable world. The GECO Project includes various institutions and organizations from countries including France, the United Kingdom, Italy, Iceland, and Germany. Zorlu Energy and Middle East Technical University are the only participants from Turkey. Under the project, initiated with the “Grant Agreement,” a grant of approximately €15 million will be provided to Zorlu Energy in long term for use in R&D work in the area of sustainable generation of geothermal energy. Zorlu Energy will contribute to the GECO Project with its vast experience and R&D resources in the field of geothermal energy.

[Add row]

(7.58) Describe your organization’s efforts to reduce methane emissions from your activities.

CO₂, CH₄, and N₂O are emitted during fuel combustion. With natural gas, almost all of the carbon (99.9%) is converted to CO₂, and this conversion process is largely unaffected by the combustion method. A small fraction of carbon that doesn't convert results in CH₄ emissions, caused by incomplete combustion. Even in boilers with lower combustion efficiency, CH₄ emissions are minor compared to CO₂ output. Methane emissions become more prominent during low-temperature or incomplete combustion, such as during start-up or shutdown. To reduce methane emissions, our natural gas power plants continuously monitor and regulate optimal temperature and pressure using automated systems. Our wind power plants do not affect CH₄ emissions at all.

(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 contribute to Türkiye's energy transition through our onshore wind power investments. In the high wind potential Thrace region, we are developing the Tekirdağ Yeniçiftlik and Lüleburgaz Hamitabat Wind Power Plant projects. With these projects, we aim to establish wind power plants with a total capacity of 375 MW with integrated storage systems. We have completed the pre-licensing processes, installed wind measurement masts, and initiated engineering studies. Once operational, these projects will expand our renewable energy capacity and significantly contribute to Türkiye's energy supply security and emission reduction efforts.

(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

0.442

(7.74.1.12) Explain your calculation of avoided emissions, including any assumptions

The grid emission factor for electricity generated in Türkiye is 0.442 tCO₂e/MWh. By generating each megawatt-hour of electricity from renewable energy sources instead of the national grid mix, we avoid the associated grid emissions. Therefore, the emission reduction impact has been calculated based on the amount of renewable electricity generated multiplied by the national grid emission factor (0.442 tCO₂e/MWh).

(7.74.1.13) Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year

4.7

Row 4

(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

☒ Geothermal electricity

(7.74.1.4) Description of product(s) or service(s)

As Türkiye's leading company in geothermal power generation, we represent approximately 20% of the country's total geothermal capacity. We continue to expand our geothermal investments with a focus on sustainability and efficiency while strengthening international collaborations. We aim to increase our current geothermal capacity from 305 MW to 500 MW by implementing innovative engineering solutions such as ESP (Electrical Submersible Pump) technology to improve efficiency. Our strategic cooperation agreement with Harbin Electric International from China will further enhance the efficiency and reliability of our geothermal power projects, helping us unlock Türkiye's geothermal potential to the fullest.

(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

0.442

(7.74.1.12) Explain your calculation of avoided emissions, including any assumptions

The grid emission factor for electricity generated in Türkiye is 0.442 tCO₂e/MWh. By generating each megawatt-hour of electricity from renewable energy sources instead of the national grid mix, we avoid the associated grid emissions. Therefore, the emission reduction impact has been calculated based on the amount of renewable electricity generated multiplied by the national grid emission factor (0.442 tCO₂e/MWh).

(7.74.1.13) Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year

18.9

Row 5

(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)

Since 2007, we have been developing and operating hydropower plants and other renewable-based electricity generation facilities in Türkiye. Within the scope of privatization, we took over the operation rights of 7 hydropower plants for 30 years and continue electricity generation and modernization activities at these plants. Through our hydropower investments, we aim to support the country's renewable energy supply, increase generation efficiency, and contribute to the reduction of greenhouse gas emissions.

(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

0.442

(7.74.1.12) Explain your calculation of avoided emissions, including any assumptions

The grid emission factor for electricity generated in Türkiye is 0.442 tCO₂e/MWh. By generating each megawatt-hour of electricity from renewable energy sources instead of the national grid mix, we avoid the associated grid emissions. Therefore, the emission reduction impact has been calculated based on the amount of renewable electricity generated multiplied by the national grid emission factor (0.442 tCO₂e/MWh).

(7.74.1.13) Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year

2.8

[Add row]

(7.79) Has your organization retired any project-based carbon credits within the reporting year?

Select from:

☒ No

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:

☒ Other, please specify

(9.1.1.2) Description of exclusion

Negligible data.

(9.1.1.3) Reason for exclusion

Select from:

☒ Data is not available

(9.1.1.4) Primary reason why data is not available

Select from:

☒ Judged to be unimportant or not relevant

(9.1.1.7) Percentage of water volume the exclusion represents

Select from:

☒ Less than 1%

(9.1.1.8) Please explain

Zorlu Enerji has only 2 employees operating in a small office in a 5 block facility which the Company does not have any access to water consumption data. As it constitutes a considerably small fraction of the overall water accounting data and therefore considered as “not material”, we have not yet taken any measures to include this facility in our water accounting.

[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:

☒ Monthly

(9.2.3) Method of measurement

Performance is monitored by Zorlu Energy. In order to track our performance, we monitor all water-related data including the total volume of water withdrawals at our power plants as well as in our Istanbul Headquarters.

Water withdrawals – volumes by source

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Monthly

(9.2.3) Method of measurement

100% of water withdrawal is measured and monitored monthly.

Water withdrawals quality

(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

All withdrawal water is analyzed before using it to ensure that quality parameters are met the limit figure.

Water discharges – total volumes

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Monthly

(9.2.3) Method of measurement

Alaşehir and Kızıldere plant's treated wastewater is discharged into the surface water (river) in line with the Discharge Permission Certificate.

Water discharges – volumes by destination

(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

Alaşehir and Kızıldere plant's treated wastewater is discharged into the surface water (river) in line with the Discharge Permission Certificate. All discharged destinations are known and followed.

Water discharges – volumes by treatment method

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Monthly

(9.2.3) Method of measurement

All treated wastewater is analyzed monthly by an accredited laboratory to comply with the Turkish Water Pollution Control Regulation.

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:

☒ Monthly

(9.2.3) Method of measurement

BOD, COD, TSS, and pH parameters are analyzed monthly.

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

In Zorlu Enerji's operations, the majority of water withdrawals are from hydroelectric power plants (HPPs). The water is abstracted from clean surface water sources and discharged back after being used for energy generation, without any chemical treatment or alteration. Therefore, there are no emissions of nitrates, phosphates, pesticides, or other priority substances to water.

Water discharge quality – temperature

(9.2.1) % of sites/facilities/operations

Select from:

☒ Not relevant

(9.2.4) Please explain

The water used in HPPs does not undergo any process that would change its temperature. It is returned to the environment at essentially the same temperature as when it was withdrawn. Consequently, there is no need for measurement or monitoring of discharge water temperature.

Water consumption – total volume

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Monthly

(9.2.3) Method of measurement

We monitor all water-related data including the total volume of water consumption in each location we operate, bimonthly.

Water recycled/reused

(9.2.1) % of sites/facilities/operations

Select from:

☒ 76-99

(9.2.2) Frequency of measurement

Select from:

☒ Continuously

(9.2.3) Method of measurement

All reinjected amount is monitored continuously.

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:

☒ Continuously

(9.2.3) Method of measurement

In order to track our performance, we monitor all water-related data and make sure we provide fully functioning WASH services to all Zorlu Enerji employees.
[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

To preserve the downstream natural habitat, we have released water at a sufficient flow into the river. Since there are no irrigation areas between the diversion weir and the power plants, a continuous water flow for the natural ecosystem is ensured. Our İkitidere HEPP site is located at the border of the İkitidere district, an area rich in species diversity and biodiversity significance. As part of our flora and fauna studies at İkitidere HPP, we conducted year-long fieldwork during the growing season to identify rare and threatened species on global, European, and local scales. Mercan HEPP is situated in Munzur Valley National Park, a region known for its natural resources such as rivers, springs, unique wildlife, and endemic plant species. No negative impacts on biodiversity have been identified at our power plants, which operate as channel-type HEPPs. Additionally, no invasive species, insects, or pathogens were detected. Our methods for identifying endangered and rare species, based on IUCN endangered levels, CITES, Bern, and other international and local regulations, include the proper collection of plant samples, transforming them into herbarium specimens, and documenting them with digital cameras for identification. At Zorlu Enerji, we prioritize preserving Turkey's natural and cultural heritage for future generations. To this end, we have begun monitoring the living species in our power plant locations. Since the start of our operations, we have tracked changes in the populations of valuable and threatened species in the region, especially the red-spotted trout in facilities without fish passages. We have determined that it is possible to reverse these changes by implementing fish migration practices, along with online sap water monitoring systems and biological monitoring systems. We are currently planning the implementation of these measures. This assessment covers all of Zorlu Enerji's operations in Turkey, including Ataköy, Çıldır, Mercan, Tercan, Beyköy, Kuzgun, and İkitidere HEPPs.

Sediment loading

(9.2.1.1) % of sites/facilities/operations measured and monitored

Select from:

☒ 100%

(9.2.1.2) Please explain

Necessary precautions including minimum flow, sediment, and fish passage have been included in all of our HEPPs. The weir does not affect the spawning habitat for fish. Through the scouring sluice just by the weir spillway, any sediments accumulating before the weir will be released to downstream. Our run-off river types HEPPs include a sediment passage and involve the accumulation of sediment. There is no significant accumulation is expected at our dam type HEPPs, as there exist a sediment passage in the weir design and all sediments are trapped. This assessment covers all of Zorlu Enerji's operations in Turkey, including Ataköy, Çıldır, Mercan, Tercan, Beyköy, Kuzgun, and İkitidere HEPPs.

Other, please specify

(9.2.1.1) % of sites/facilities/operations measured and monitored

Select from:

☒ Not relevant

[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/year)

2124329.95

(9.2.2.2) Comparison with previous reporting year

Select from:

☒ Lower

(9.2.2.4) Five-year forecast

Select from:

☒ Lower

(9.2.2.5) Primary reason for forecast

Select from:

☒ Increase/decrease in efficiency

(9.2.2.6) Please explain

The decrease in water withdrawal is mainly due to the hydrological variability affecting hydroelectric power plants. In this report, our threshold for "lower" is between 4% and %19. Water withdrawal, discharge, and consequently consumption significantly depend on rainfall regimes and seasonal flow fluctuations. At Kızıldere 1-2-3 Geothermal Power Plants, we utilize a reverse osmosis system. Through this method, we reduce dependence on municipal water for domestic use and support sustainable water management. In our hydroelectric power plants, we generate energy without disrupting the natural flow of water. After energy production, the water is returned to nature without harming the ecosystem. By renewing turbines and generators, we increase the efficiency of converting water into energy. In addition, rehabilitation works such as widening transmission tunnels allow us to generate more energy from the same water source while reducing water consumption per unit of energy. In our offices, we contribute to sustainability through practices that encourage the efficient use of water. Levent 199 Building, with its LEED Gold

Certification, minimizes water consumption with low-flow fixtures, rainwater harvesting systems, and water-efficient landscaping practices. In newly constructed buildings by OEDAŞ, rainwater collection and harvesting systems enable water reuse. These systems contribute to the conservation of natural resources and help reduce the burden on infrastructure.

Total discharges

(9.2.2.1) Volume (megaliters/year)

2013684.96

(9.2.2.2) Comparison with previous reporting year

Select from:

☒ Lower

(9.2.2.4) Five-year forecast

Select from:

☒ Lower

(9.2.2.5) Primary reason for forecast

Select from:

☒ Increase/decrease in efficiency

(9.2.2.6) Please explain

The decrease in water discharge is mainly due to the hydrological variability affecting hydroelectric power plants. In this report, our threshold for "lower" is between 4% and %19. Water withdrawal, discharge, and consequently consumption significantly depend on rainfall regimes and seasonal flow fluctuations. At Kızıldere 1-2-3 Geothermal Power Plants, we utilize a reverse osmosis system. Through this method, we reduce dependence on municipal water for domestic use and support sustainable water management. In our hydroelectric power plants, we generate energy without disrupting the natural flow of water. After energy production, the water is returned to nature without harming the ecosystem. By renewing turbines and generators, we increase the efficiency of converting water into energy. In addition, rehabilitation works such as widening transmission tunnels allow us to generate more energy from the same water source while reducing water consumption per unit of energy. In our offices, we contribute to sustainability through practices that encourage the efficient use of water. Levent 199 Building, with its LEED Gold Certification, minimizes water consumption with low-flow fixtures, rainwater harvesting systems, and water-efficient landscaping practices. In newly constructed

buildings by OEDAŞ, rainwater collection and harvesting systems enable water reuse. These systems contribute to the conservation of natural resources and help reduce the burden on infrastructure.

Total consumption

(9.2.2.1) Volume (megaliters/year)

110644.99

(9.2.2.2) Comparison with previous reporting year

Select from:

☒ Lower

(9.2.2.4) Five-year forecast

Select from:

☒ Lower

(9.2.2.5) Primary reason for forecast

Select from:

☒ Increase/decrease in efficiency

(9.2.2.6) Please explain

The decrease in water consumption is mainly due to the hydrological variability affecting hydroelectric power plants. In this report, our threshold for "lower" is between 4% and %19. Water withdrawal, discharge, and consequently consumption significantly depend on rainfall regimes and seasonal flow fluctuations. At Kızıldere 1-2-3 Geothermal Power Plants, we utilize a reverse osmosis system. Through this method, we reduce dependence on municipal water for domestic use and support sustainable water management. In our hydroelectric power plants, we generate energy without disrupting the natural flow of water. After energy production, the water is returned to nature without harming the ecosystem. By renewing turbines and generators, we increase the efficiency of converting water into energy. In addition, rehabilitation works such as widening transmission tunnels allow us to generate more energy from the same water source while reducing water consumption per unit of energy. In our offices, we contribute to sustainability through practices that encourage the efficient use of water. Levent 199 Building, with its LEED Gold Certification, minimizes water consumption with low-flow fixtures, rainwater harvesting systems, and water-efficient landscaping practices. In newly constructed buildings by OEDAŞ, rainwater collection and harvesting systems enable water reuse. These systems contribute to the conservation of natural resources and help reduce the burden on infrastructure.

[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)

54850.29

(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:

☒ Investment in water-smart technology/process

(9.2.4.5) Five-year forecast

Select from:

☒ Much lower

(9.2.4.6) Primary reason for forecast

Select from:

☒ Increase/decrease in efficiency

(9.2.4.7) % of total withdrawals that are withdrawn from areas with water stress

2.58

(9.2.4.8) Identification tool

Select all that apply

☒ WRI Aqueduct

☒ WWF Water Risk Filter

(9.2.4.9) Please explain

We have production sites on 11 different basins: Aras Basin, Büyük Menderes Basin, Ceyhan Basin, Çoruh Basin, Fırat Basin, Gediz Basin, Indus Basin, Marmara Basin, Meriç-Ergene Basin, Sakarya Basin, and Yeşilırmak Basin. The share of withdrawal water from basins and their risks are as follows: 70% from the Çoruh Basin Low-Medium Risk (10-20%) 26% from the Sakarya Basin Medium-High Risk (20-40%) 3% from the Büyük Menderes Basin Extremely High Risk (80%) 1% from Marmara Basin Extremely High Risk (80%) The withdrawal water from Ceyhan, Indus, Meriç-Ergene, Gediz, Aras, and Fırat Basin is negligible. We conduct comprehensive water risk assessments to minimize the environmental impacts of our operations in water-stressed regions. By utilizing internationally recognized data sources such as the WWF Water Risk Filter and the WRI Aqueduct Water Risk Atlas, we periodically evaluate the risks on our water resources and develop preventive and corrective strategies accordingly. The coordinates of each production site are entered into the tool and water stress is analyzed through the WRI Aqueduct Water Risk Atlas. The risk is defined as Low-Medium (10-20%) and Medium-High (20-40%) for the 96% of withdrawal water which shows that our operations are located in medium water-stressed areas. In regions with high and very high water stress, we commit to reducing our water consumption by 10% annually compared to the previous year. Through investments in advanced technologies to optimize water use, initiatives to increase water recycling rates, and community collaborations aimed at protecting local water resources, we plan to achieve our annual water consumption reduction target.

[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/year)

2031155.62

(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

There is a decrease (based on clean surface water and water withdrawn for hydropower plants). It varies depending on the rainfall regime and the amount of electricity generated.

Brackish surface water/Seawater

(9.2.7.1) Relevance

Select from:

☒ Relevant

(9.2.7.2) Volume (megaliters/year)

0.45

(9.2.7.3) Comparison with previous reporting year

Select from:

☒ Much 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

Sea water withdrawals are reported only for our Pakistan power plant and occur on a seasonal basis in line with operational requirements. The decrease observed is due to these periodic variations rather than a structural reduction in availability.

Groundwater – renewable

(9.2.7.1) Relevance

Select from:

☒ Relevant

(9.2.7.2) Volume (megaliters/year)

92495.19

(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

There has been a decrease due to geothermal power plants (GPPs).

Groundwater – non-renewable

(9.2.7.1) Relevance

Select from:

☒ Relevant

(9.2.7.2) Volume (megaliters/year)

454569

(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

It comes from the Luleburgaz thermal power plant and is used for steam generation.

Produced/Entrained water

(9.2.7.1) Relevance

Select from:

☒ Not relevant

Third party sources

(9.2.7.1) Relevance

Select from:

☒ Not relevant

[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/year)

1929600.39

(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

The variation is driven by the electricity generation levels of the hydropower plants. In this report, our threshold for "higher" and "lower" is between 4% and %19.

Brackish surface water/seawater

(9.2.8.1) Relevance

Select from:

☒ Not relevant

Groundwater

(9.2.8.1) Relevance

Select from:

☒ Relevant

(9.2.8.2) Volume (megaliters/year)

83895.1

(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

The source of the issue is geothermal power plants. As a mitigation measure, we are working to reintegrate the steam losses from the cooling tower back into the system. In this report, our threshold for "higher" and "lower" is between 4% and %19.

Third-party destinations

(9.2.8.1) Relevance

Select from:

☒ Relevant

(9.2.8.2) Volume (megaliters/year)

189892.24

(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 efficiency

(9.2.8.5) Please explain

Through our initiatives promoting the efficient use of water in our offices, we contribute to sustainability. The Levent 199 Building, with its LEED Gold Certification, minimizes water consumption through low-flow fixtures, a rainwater harvesting system, and water-efficient landscaping practices. In newly constructed buildings by OEDAŞ, rainwater collection and harvesting systems enable the reuse of water. These systems help conserve natural resources and reduce the burden on infrastructure. As part of the ETIM initiative, water consumption is measured monthly and the annual per capita average is monitored. Water leaks are regularly detected and controlled. Reusable cups are encouraged instead of disposable ones and water-saving devices are used in faucets. Within this scope, OEPSAŞ achieved a significant success by receiving a Gold Certificate for its efforts carried out in line with the Smart Life 2030 vision. In this report, our threshold for "higher" and "lower" is btw 4% and %19.

[Fixed row]

(9.2.9) Within your direct operations, indicate the highest level(s) to which you treat your discharge.

Tertiary treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☒ Not relevant

Secondary treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☒ Relevant

(9.2.9.2) Volume (megaliters/year)

3

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☒ Lower

(9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☒ Investment in water-smart technology/process

(9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

☒ Less than 1%

(9.2.9.6) Please explain

The wastewater of the Alaşehir and Kızıldere facilities is subjected to biological treatment under the Discharge Permit and then discharged into surface water (river).

Primary treatment only

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☒ Not relevant

Discharge to the natural environment without treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☒ Relevant

(9.2.9.2) Volume (megaliters/year)

1929597.4

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☒ Lower

(9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

(9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

☒ 91-99

(9.2.9.6) Please explain

Reduction in water abstraction at hydropower plants (HPPs).

Discharge to a third party without treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☒ Relevant

(9.2.9.2) Volume (megaliters/year)

187.71

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☒ Lower

(9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

☒ Less than 1%

(9.2.9.6) Please explain

Municipal (network) water supply.

Other

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☒ Relevant

(9.2.9.2) Volume (megaliters/year)

83892.24

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☒ Higher

(9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☒ Investment in water-smart technology/process

(9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

☒ 1-10

(9.2.9.6) Please explain

Reinjection in geothermal plants.

[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 water-related dependencies, impacts, risks, and opportunities

(9.3.2) Total number of facilities identified

16

(9.3.3) % of facilities in direct operations that this represents

Select from:

☒ 76-99

(9.3.4) Please explain

Zorlu Enerji has only 2 employees operating in a small office in a 5 block facility which the Company does not have any access to water consumption data. As it constitutes a considerably small fraction of the overall water accounting data and therefore considered as “not material”, we have not yet taken any measures to include this facility in our water accounting. Our geothermal and hydropower plants depend on water resources, but the level of risk varies by technology and location. Geothermal plants face higher water stress due to cooling water use in water-scarce regions, while hydropower plants are mainly exposed to seasonal rainfall variability. The majority of these risks are mitigated through efficiency improvements, monitoring systems, and water management practices.

Upstream value chain

(9.3.1) Identification of facilities in the value chain stage

Select from:

☒ No, we have assessed this value chain stage but did not identify any facilities with water-related dependencies, impacts, risks, and opportunities

[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)

ZES

(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
- ☒ Opportunities

(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

Turkey

- ☒ Other, please specify :Aras 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)

0.32

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☒ This is our first year of measurement

(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

0.32

(9.3.1.21) Total water discharges at this facility (megaliters)

0.32

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☒ This is our first year of measurement

(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

0.32

(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:

☒ This is our first year of measurement

Row 2

(9.3.1.1) Facility reference number

Select from:

☒ Facility 2

(9.3.1.2) Facility name (optional)

Lüleburgaz Natural Gas 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

☒ Opportunities

(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

Turkey

☒ Other, please specify :Marmara Basin

(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:

☒ Gas

(9.3.1.13) Total water withdrawals at this facility (megaliters)

545

(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

454

(9.3.1.19) Withdrawals from produced/entrained water

91

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.21) Total water discharges at this facility (megaliters)

167.13

(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

167.13

(9.3.1.27) Total water consumption at this facility (megaliters)

377.87

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ Higher

(9.3.1.29) Please explain

Lüleburgaz facility uses well water and recycled water. The water obtained from Zorlu Textiles' (the sister company located in the same area) wastewater treatment plant is purified in Lüleburgaz Natural Gas Plant and the resulting clean water is used in the operations. Wastewater is transferred back to Zorluteks' wastewater treatment plant. Domestic wastewater is connected to the sewage system and discharged to the municipality treatment plant. In Lüleburgaz Natural Gas Power Plant, the wastewater is reused which is supplied from Zorlu Textile's wastewater treatment plant. Our water consumption figure is a calculation using withdrawals minus discharges.

Row 3

(9.3.1.1) Facility reference number

Select from:

☒ Facility 3

(9.3.1.2) Facility name (optional)

Gökçedağ 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

☒ Opportunities

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☒ Yes, withdrawals only

(9.3.1.6) Reason for no withdrawals and/or discharges

There is no water needed for wind power electricity generation. Therefore, the given figures are for domestic water. Water is withdrawn from the water well. Domestic wastewater is collected at the cesspool in line with the discharge permit license and transferred by the sewage truck to the municipality treatment plant.

(9.3.1.7) Country/Area & River basin

Turkey

☒ Other, please specify :Meriç - Ergene 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

Row 4

(9.3.1.1) Facility reference number

Select from:

☒ Facility 4

(9.3.1.2) Facility name (optional)

Pakistani 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

☒ Opportunities

(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

Afghanistan

☒ 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)

6.56

(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

0.45

(9.3.1.17) Withdrawals from groundwater - renewable

6.11

(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)

4.57

(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

2.88

(9.3.1.26) Discharges to third party destinations

1.69

(9.3.1.27) Total water consumption at this facility (megaliters)

1.99

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ About the same

(9.3.1.29) Please explain

There is no water needed for wind power electricity generation. Therefore, the given figures are for domestic water. Water is withdrawn from the water well. Domestic wastewater is collected at the cesspool in line with the discharge permit license and transferred by the sewage truck to the municipality treatment plant. Our water consumption figure is a calculation using withdrawals minus discharges.

Row 5

(9.3.1.1) Facility reference number

Select from:

☒ Facility 5

(9.3.1.2) Facility name (optional)

Alaşehir 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
- ☒ Opportunities

(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

Turkey

- ☒ 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)

20851

(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

20848

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

3

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.21) Total water discharges at this facility (megaliters)

18046

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☒ Lower

(9.3.1.23) Discharges to fresh surface water

3

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

18043

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

2805

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ Lower

(9.3.1.29) Please explain

In our geothermal power plants, the geothermal fluid is reinjected into the reservoir. Geothermal reinjection involves returning some, or even all, of the water produced from a geothermal reservoir back into the geothermal system after energy has been extracted from the water. Thus, the reinjection of geothermal fluid is renewable groundwater. Domestic wastewater is discharged into the river. Water consumption decreased by 1.2% compared to the previous year, which is considered about the same. Our water consumption figure is a calculation using withdrawals minus discharges. The amount of discharge to groundwater refers to reinjection for geothermal operations.

Row 6

(9.3.1.1) Facility reference number

Select from:

☒ Facility 6

(9.3.1.2) Facility name (optional)

Kızıldere 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

☒ Opportunities

(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

Turkey

☒ Other, please specify :Büyük 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)

71751

(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

71641

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

110

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.21) Total water discharges at this facility (megaliters)

66202

(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

66202

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

5549

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ Lower

(9.3.1.29) Please explain

In our geothermal power plants, the geothermal fluid is reinjected into the reservoir. Geothermal reinjection involves returning some, or even all, of the water produced from a geothermal reservoir back into the geothermal system after energy has been extracted from the water. Thus, the reinjection of geothermal fluid is renewable groundwater. Our water consumption figure is a calculation using withdrawals minus discharges.

Row 7

(9.3.1.1) Facility reference number

Select from:

☒ Facility 7

(9.3.1.2) Facility name (optional)

Ataköy 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
- ☒ Opportunities

(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

Turkey

- ☒ Other, please specify :Yeşilırmak River Basin

(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)

246633

(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

246633

(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)

246633

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☒ Higher

(9.3.1.23) Discharges to fresh surface water

246633

(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)

0

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ Lower

(9.3.1.29) Please explain

The water is withdrawn from the reservoir surface and used for electricity generation. Our water consumption figure is a calculation using withdrawals minus discharges.

Row 8

(9.3.1.1) Facility reference number

Select from:

☒ Facility 8

(9.3.1.2) Facility name (optional)

Beyköy 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

☒ Opportunities

(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

Turkey

☒ Sakarya

(9.3.1.8) Latitude

40.073156

(9.3.1.9) Longitude

30.755448

(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)

668632

(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

668631.93

(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

0.07

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.21) Total water discharges at this facility (megaliters)

668632

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☒ Lower

(9.3.1.23) Discharges to fresh surface water

668632

(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)

0

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ Lower

(9.3.1.29) Please explain

Beyköy is a channel-type hydroelectric power plant. Withdrawn water is discharged into the same river after being used for electricity generation. Our water consumption figure is a calculation using withdrawals minus discharges.

Row 9

(9.3.1.1) Facility reference number

Select from:

☒ Facility 9

(9.3.1.2) Facility name (optional)

Çıldır 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
- ☒ Opportunities

(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

Turkey

- ☒ 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)

85848

(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

85847.95

(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

0.05

(9.3.1.21) Total water discharges at this facility (megaliters)

85847.8

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☒ Higher

(9.3.1.23) Discharges to fresh surface water

85847.8

(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)

0.03

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ Much lower

(9.3.1.29) Please explain

The water is withdrawn from the reservoir surface and used for electricity generation. Our water consumption figure is a calculation using withdrawals minus discharges.

Row 10

(9.3.1.1) Facility reference number

Select from:

☒ Facility 10

(9.3.1.2) Facility name (optional)

İkizdere 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

☒ Opportunities

(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

Turkey

☒ Other, please specify :İkizdere River 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)

322599

(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

322597.5

(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

1.5

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.21) Total water discharges at this facility (megaliters)

322599

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☒ Higher

(9.3.1.23) Discharges to fresh surface water

322598

(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

1.5

(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:

☒ Lower

(9.3.1.29) Please explain

İkizdere is a channel-type hydroelectric power plant. Withdrawn water is released into the same river after being used for electricity generation. The discharge amount includes domestic-purpose water use. Our water consumption figure is a calculation using withdrawals minus discharges.

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
- ☒ Opportunities

(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

Afghanistan

- ☒ Other, please specify :Yeşilırmak Basin

(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)

93630.55

(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

93630.55

(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)

93630.55

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☒ Lower

(9.3.1.23) Discharges to fresh surface water

93630.55

(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)

0

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ Lower

(9.3.1.29) Please explain

The water is withdrawn from the reservoir surface and used for electricity generation. Our water consumption figure is a calculation using withdrawals minus discharges.

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

☒ Opportunities

(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

Turkey

☒ Sakarya

(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)

187528

(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

187528

(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)

187528

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☒ Higher

(9.3.1.23) Discharges to fresh surface water

187528

(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)

0

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ Lower

(9.3.1.29) Please explain

Mercan is a channel-type hydroelectric power plant. Withdrawn water is released into the same river after being used for electricity generation. The discharge amount includes domestic-purpose water use. Our water consumption figure is a calculation using withdrawals minus discharges.

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
- ☒ Opportunities

(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

Afghanistan

- ☒ Other, please specify :Marmara Basin

(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)

426286

(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

426286

(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)

426286

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☒ Higher

(9.3.1.23) Discharges to fresh surface water

426286

(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)

0

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ Lower

(9.3.1.29) Please explain

The water is withdrawn from the reservoir surface and used for electricity generation. Our water consumption figure is a calculation using withdrawals minus discharges.

Row 15

(9.3.1.1) Facility reference number

Select from:

☒ Facility 14

(9.3.1.2) Facility name (optional)

OEPSAŞ

(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

☒ Opportunities

(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

Afghanistan

☒ Other, please specify :Firat Basin

(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:

☒ 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

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:

☒ 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

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

Our water consumption figure is a calculation using withdrawals minus discharges.

Row 16

(9.3.1.1) Facility reference number

Select from:

☒ Facility 15

(9.3.1.2) Facility name (optional)

OEDAŞ

(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

☒ Opportunities

(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

Afghanistan

☒ Other, please specify

(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)

15.25

(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

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

15.25

(9.3.1.21) Total water discharges at this facility (megaliters)

14.49

(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

0

(9.3.1.26) Discharges to third party destinations

14.49

(9.3.1.27) Total water consumption at this facility (megaliters)

0.76

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ About the same

(9.3.1.29) Please explain

Our water consumption figure is a calculation using withdrawals minus discharges.

Row 17

(9.3.1.1) Facility reference number

Select from:

☒ Facility 16

(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

☒ Opportunities

(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

Turkey

☒ Other, please specify :Aras 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)

1.7

(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

0.1

(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

1.6

(9.3.1.21) Total water discharges at this facility (megaliters)

1.7

(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

1.7

(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

Our water consumption figure is a calculation using withdrawals minus discharges.

[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

It has been verified according to the "ISO 14046:2014 Environmental management - Water footprint Standard" by an accredited third-party verification body. All data has been verified with reasonable assurance level.

Water withdrawals – volume by source

(9.3.2.1) % verified

Select from:

☒ 76-100

(9.3.2.2) Verification standard used

It has been verified according to the "ISO 14046:2014 Environmental management - Water footprint Standard" by an accredited third-party verification body. All data has been verified with reasonable assurance level.

Water withdrawals – quality by standard water quality parameters

(9.3.2.1) % verified

Select from:

☒ 51-75

(9.3.2.2) Verification standard used

It has been verified according to the "ISO 14046:2014 Environmental management - Water footprint Standard" by an accredited third-party verification body. All data has been verified with reasonable assurance level.

Water discharges – total volumes

(9.3.2.1) % verified

Select from:

☒ 76-100

(9.3.2.2) Verification standard used

It has been verified according to the "ISO 14046:2014 Environmental management - Water footprint Standard" by an accredited third-party verification body. All data has been verified with reasonable assurance level.

Water discharges – volume by destination

(9.3.2.1) % verified

Select from:

☒ 76-100

(9.3.2.2) Verification standard used

It has been verified according to the "ISO 14046:2014 Environmental management - Water footprint Standard" by an accredited third-party verification body. All data has been verified with reasonable assurance level.

Water discharges – volume by final treatment level

(9.3.2.1) % verified

Select from:

☒ Not verified

(9.3.2.3) Please explain

The final treatment level is not measured. This approach is not suitable for us since, in geothermal power plants (GPPs), the extracted water is reinjected, while in hydroelectric power plants (HPPs), the withdrawn water is directly discharged back.

Water discharges – quality by standard water quality parameters

(9.3.2.1) % verified

Select from:

☒ 76-100

(9.3.2.2) Verification standard used

It has been verified according to the "ISO 14046:2014 Environmental management - Water footprint Standard" by an accredited third-party verification body. All data has been verified with reasonable assurance level.

Water consumption – total volume

(9.3.2.1) % verified

Select from:

☒ 76-100

(9.3.2.2) Verification standard used

It has been verified according to the "ISO 14046:2014 Environmental management - Water footprint Standard" by an accredited third-party verification body. All data has been verified with reasonable assurance level.

[Fixed row]

(9.5) Provide a figure for your organization's total water withdrawal efficiency.

	Revenue (currency)	Total water withdrawal efficiency
	1	0.00

[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)

0.18

(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:

☒ Higher

(9.7.1.5) Please explain

There is an increase in the amount of electricity generated compared to last year.

[Add row]

(9.13) Do any of your products contain substances classified as hazardous by a regulatory authority?

	Products contain hazardous substances	Comment
	<div>Select from:</div> <div><input checked="" type="checkbox"/> No</div>	Since we generate electricity, there is no hazardous substance in our product.

[Fixed row]

(9.14) Do you classify any of your current products and/or services as low water impact?

	Products and/or services classified as low water impact	Primary reason for not classifying any of your current products and/or services as low water impact	Please explain
	<i>Select from:</i> <input checked="" type="checkbox"/> No, and we do not plan to address this within the next two years	<i>Select from:</i> <input checked="" type="checkbox"/> Judged to be unimportant, explanation provided	<i>We are producing electricity from renewable sources. Our impact due to our service is negligible.</i>

[Fixed row]

(9.15) Do you have any water-related targets?

Select from:

☒ Yes

(9.15.1) Indicate whether you have targets relating to water pollution, water withdrawals, WASH, or other water-related categories.

Water pollution

(9.15.1.1) Target set in this category

Select from:

☒ No, but we plan to within the next two years

(9.15.1.2) Please explain

Since the discharged water quality is almost the same as the domestic wastewater quality; we do not have a target. However, we are planning to define a target in two years.

Water withdrawals

(9.15.1.1) Target set in this category

Select from:

☒ Yes

Water, Sanitation, and Hygiene (WASH) services

(9.15.1.1) Target set in this category

Select from:

☒ No, but we plan to within the next two years

(9.15.1.2) Please explain

We are planning to define a target for water, sanitation and WASH services.

Other

(9.15.1.1) Target set in this category

Select from:

☒ Yes

[Fixed row]

(9.15.2) Provide details of your water-related targets and the progress made.

Row 1

(9.15.2.1) Target reference number

Select from:

☒ Target 1

(9.15.2.2) Target coverage

Select from:

☒ Organization-wide (direct operations only)

(9.15.2.3) Category of target & Quantitative metric

Water withdrawals

☒ Reduction in total water withdrawals

(9.15.2.4) Date target was set

12/30/2016

(9.15.2.5) End date of base year

12/30/2016

(9.15.2.6) Base year figure

2863701

(9.15.2.7) End date of target year

12/30/2023

(9.15.2.8) Target year figure

2720516

(9.15.2.9) Reporting year figure

2234327

(9.15.2.10) Target status in reporting year

Select from:

☒ Achieved

(9.15.2.11) % of target achieved relative to base year

440

(9.15.2.12) Global environmental treaties/initiatives/ frameworks aligned with or supported by this target

Select all that apply

☒ Sustainable Development Goal 6

(9.15.2.13) Explain target coverage and identify any exclusions

We aimed to reduce our total water withdrawals by 5% by 2022. In this reporting year, we reduced about 21.97% compared to the base year which is defined as 2016. Therefore, we have reached our target in advance. A new target is defined in line with Zorlu Holding's Smart Life 2030 strategy.

(9.15.2.15) Actions which contributed most to achieving or maintaining this target

Zorlu Energy has developed various actions to achieve its goal of reducing water intake. By implementing water management systems, it monitors and manages water resources effectively. The company encourages the reuse of available water through the development of water recycling projects. Additionally, it focuses on researching and applying new technologies to reduce water consumption. Zorlu Energy collaborates with its employees to support projects aimed at water conservation and continues its efforts in this direction. These actions significantly contribute to Zorlu Energy's sustainability goals.

Row 2

(9.15.2.1) Target reference number

Select from:

☒ Target 2

(9.15.2.2) Target coverage

Select from:

☒ Organization-wide (direct operations only)

(9.15.2.3) Category of target & Quantitative metric

Monitoring of water use

☒ Increase in the proportion of sites monitoring water recycled/reused

(9.15.2.4) Date target was set

12/31/2019

(9.15.2.5) End date of base year

12/30/2016

(9.15.2.6) Base year figure

11.6

(9.15.2.7) End date of target year

12/30/2030

(9.15.2.8) Target year figure

50

(9.15.2.9) Reporting year figure

3.73

(9.15.2.10) Target status in reporting year

Select from:

☒ Underway

(9.15.2.11) % of target achieved relative to base year

-20

(9.15.2.12) Global environmental treaties/initiatives/ frameworks aligned with or supported by this target

Select all that apply

☒ Sustainable Development Goal 6

(9.15.2.13) Explain target coverage and identify any exclusions

With the vision of Smart Life 2030, Zorlu Holding is in the process of setting water targets in terms of less and efficient use of natural resources, for all its group companies including Zorlu Energy. Zorlu Energy aims to recycle 50% of the consumed water by 2030 and 100% by 2050. Zorlu Enerji's water consumption mainly originates from the generation processes in natural gas, geothermal and hydroelectric power plants. Renewable groundwater is used for generation in geothermal power plants. Steam is obtained by separating the water-steam mixture drawn from the wells in separators, and electricity is generated through turbines by feeding the resulting steam. After condensing the steam used in the turbines within the condenser, the resulting water is sent to the cooling towers. In line with the strategy of using water efficiently, the geothermal fluid used in the generation processes is injected back underground at the end of the process

(9.15.2.14) Plan for achieving target, and progress made to the end of the reporting year

Zorlu Enerji is implementing sustainable water management strategies to achieve its water recovery target. The company is working towards this goal by reducing water consumption, improving water efficiency, and prioritizing wastewater recovery. Operational improvements at facilities aim to prevent water losses through leakage reduction and recycling techniques, ensuring more effective and efficient water use.

Row 3

(9.15.2.1) Target reference number

Select from:

☒ Target 3

(9.15.2.2) Target coverage

Select from:

☒ Organization-wide (direct operations only)

(9.15.2.3) Category of target & Quantitative metric

Water use efficiency

☒ Reduction in total water withdrawals

(9.15.2.4) Date target was set

12/31/2023

(9.15.2.5) End date of base year

12/30/2023

(9.15.2.6) Base year figure

2234327

(9.15.2.7) End date of target year

12/30/2030

(9.15.2.8) Target year figure

1128000

(9.15.2.9) Reporting year figure

2124330

(9.15.2.10) Target status in reporting year

Select from:

☒ Underway

(9.15.2.11) % of target achieved relative to base year

10

(9.15.2.12) Global environmental treaties/initiatives/ frameworks aligned with or supported by this target

Select all that apply

☒ Sustainable Development Goal 6

(9.15.2.13) Explain target coverage and identify any exclusions

To reduce our annual water withdrawal by 10% year-on-year in regions with high and extremely high water stress.
[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: <input checked="" type="checkbox"/> Yes, we use indicators	Select all that apply <input checked="" type="checkbox"/> 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:

☒ Turkey

(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: <input checked="" type="checkbox"/> 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

☒ Progress against targets

☒ Waste data

☒ Year on year change in absolute emissions (Scope 1 and 2)

- ☒ Year on year change in absolute emissions (Scope 3)
- ☒ Year on year change in emissions intensity (Scope 1 and 2)

(13.1.1.3) Verification/assurance standard

General standards

- ☒ ISAE 3000
- ☒ ISAE 3410, Assurance Engagements on Greenhouse Gas Statements

(13.1.1.4) Further details of the third-party verification/assurance process

Certain data disclosed in the Integrated Annual Report have been subjected to limited assurance by an independent third party. The specific data covered by the assurance are listed on pages 1–2 of the verification report.

(13.1.1.5) Attach verification/assurance evidence/report (optional)

Zorlu Enerji Limited Assurance_311224_Signed.pdf

Row 3

(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

(13.1.1.3) Verification/assurance standard

General standards

☒ ISAE 3000

☒ ISAE 3410, Assurance Engagements on Greenhouse Gas Statements

(13.1.1.4) Further details of the third-party verification/assurance process

Certain data disclosed in the Integrated Annual Report have been subjected to limited assurance by an independent third party. The specific data covered by the assurance are listed on pages 1–2 of the verification report.

(13.1.1.5) Attach verification/assurance evidence/report (optional)

Zorlu Enerji Limited Assurance_311224_Signed.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

Chief Executive Officer

(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 website.

Select from:

☒ Yes, CDP may share our Disclosure Submission Lead contact details with the Pacific Institute

