

2022



# Our Responsible Lobbying

## OUR RESPONSIBLE LOBBYING APPROACH

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

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



## PUBLIC POLICY

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

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

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



## TRANSPARENCY AND ETHICAL PRINCIPLES

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

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

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



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

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

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

1	SPONSORSHIPS
1.1	Sabancı University (IICEC) Support
1.2	Turkish Heritage Organisation Collaboration
1.3	12th Turkey Energy Summit
1.4	Istanbul Carbon Summit Sponsorship
1.5	ISTRADE Sponsorship
1.6	Women Empowering Turkey in Energy Awards Ceremony Sponsorship
1.7	TOSFED
1.8	TÜSİAD Climate Crisis and Carbon Sink Areas Project Sponsorship
1.9	ICCI Sponsorship
1.10	University Sponsorships
1.11	Turkuaz Medya - Energy Summit Sponsorship
1.12	6th Istanbul Economy Summit Sponsorship
2	NON GOVERNMENTAL ORGANIZATION SUPPORTS
2.1	Darüşşafaka Society Support
2.2	Turkish Education Foundation Support
2.3	Animal Rights Federation Support
2.4	ITU Graduates - Turkish Music Community Support
3	“ENERJİMİZ BÖLGEMİZ İÇİN” EVENTS
3.1	Enerjimiz Bölgemiz İçin Projesi - Alaşehir
3.2	Enerjimiz Bölgemiz İçin Projesi - İkizdere
3.4	Enerjimiz Bölgemiz İçin Projesi - Sarayköy
3.5	Enerjimiz Bölgemiz İçin - Gökçedağ
3.6	Enerjimiz Bölgemiz İçin Projesi - Kars
3.7	Enerjimiz Bölgemiz İçin Projesi - Buharkent
3.8	Enerjimiz Bölgemiz İçin Projesi - Ağrı



4

STUDENT SCHOLARSHIPS

4.1

Mehmet Zorlu Foundation Scholarships

We shared our collaborations that were carried out between January 1, 2022, and December 31, 2022, to the public on our website, as listed above. The total budget for donations and contributions realized on an annual basis is as follows. These amounts include sponsorships, events and organizations, donations, scholarships, and similar activities.

January 1 - December 31, 2021	4.702.047 TL
January 1 - December 31, 2022	14.591.546 TL *

\*The budget is reviewed and audited by the Zorlu Enerji General Management Board.

## ADVOCACY ACTIVITIES

To reflect the unique problems of regions and provide solutions, we conduct advocacy activities. These activities are implemented through our membership in various non-profit organizations, sponsorship campaigns, and awareness-raising initiatives conducted in our operational areas. Through the national and international non-profit organizations memberships, we enhance social development activities in the sector. By way of these sectoral associations, we actively share our opinions and suggestions regarding laws, regulations, initiatives, etc. that are relevant to our field of operation with legislative and regulatory institutions. We emphasize the importance of transparency and ethical values of public policies and advocacy activities and we pursue our activities under the coordination of Marketing and Corporate Communications Directorate.

Below, we submit our corporate memberships and the level of representation within our company:



Organizations and Institutions	Representatives	Position in the Company	Role in the Organization and Institution
Foreign Economic Relations Board of Türkiye (DEİK) - Israel Business Council	Sinan AK	CEO	Chairperson of the Executive Board
DEİK (Foreign Economic Relations Board of Türkiye)	Sinan AK	CEO	Representative Member
DEİK Energy Business Council	Sinan AK	CEO	Representative Member
DEİK Turkey - US Business Council	Sinan AK	CEO	Representative Member
DEİK Turkey - Russia Business Council	Sinan AK	CEO	Representative Member
DEİK Turkey - Greece Business Council	Sinan AK	CEO	Representative Member
DEİK Turkey - UK Business Council	Sinan AK	CEO	Representative Member
TESAB (Turkish Electrical Industry Association)	Sinan AK	CEO	Representative Member
CIGRE Turkey National Committee (International Council on Large Electric Systems)	Sinan AK	CEO	Representative Member
ENVER (Energy Efficiency Association)	Sinan AK	CEO	Representative Member
ETD (Energy Trading Association)	Sinan AK	CEO	Representative Member
EÜD (Electricity Producers Association)	Sinan AK	CEO	Representative Member
GÜNDER (International Solar Energy Society Turkey Section)	Sinan AK	CEO	Representative Member
GÜYAD (Energy Investors Association)	Sinan AK	CEO	Representative Member
ÇATIDER (Roof Industrialists and Businessmen Association)	Sinan AK	CEO	Representative Member
INTES (Turkish Contractors Association)	Sinan AK	CEO	Representative Member
DEK (World Energy Council Turkish National Committee Association)	Sinan AK	CEO	Representative Member
United Nations Global Compact Türkiye	Sinan AK	CEO	Representative Member
SMİ (Sustainable Mobility Initiative)	Sinan AK	CEO	Representative Member
IIEEC (Sabancı University Istanbul International Center for Energy and Climate)	Sinan AK	CEO	Representative Member
Energy Council of the Union of Chambers and Commodity Exchanges of Turkey	Sinan AK	CEO	Representative Member
E-MOD (E-Mobility Operators Association)	Sinan AK	CEO	Vice Chairperson of the Board

Organizations and Institutions	Representatives	Position in the Company	Role in the Organization and Institution
H2DER (Association of Green Hydrogen Producers)	Sinan AK	CEO	Representative Member
GENSED (Solar Energy Industrialists and Industry Association)	Sinan AK	CEO	Representative Member
ELDER (Electric Distribution Services Association)	Sinan AK	CEO	Board Member
Turkish Industrialists and Businesspeople Association Energy Working Group	Sinan AK	CEO	Representative Member
TÜREB (Wind Energy Association of Turkey)	Ali Kindap	GM, Investments, O&M	Representative Member
JED (Geothermal Energy Association)	Ali Kindap	GM, Investments, O&M	Representative Member
BİYODER (Bioenergy Association)	Ali Kindap	GM, Investments, O&M	Representative Member
Hydrogen Technologies Association	Ali Kindap	GM, Investments, O&M	Representative Member
ENSİA (Energy Industrialists and Businesspeople Association)	Ali Kindap	GM, Investments, O&M	Representative Member
TÜRKOTED (Cogeneration and Clean Energy Technologies Association of Turkey)	Ali Kindap	GM, Investments, O&M	Representative Member
ERTA (Integrated Reporting Turkey Network)	Elif Yener	GM, Financial Affairs	Representative Member
GAZBİR (Natural Gas Distributors Association of Turkey)	Fuat Celepci	GM, Electricity and Gas Distribution Operations	Representative Member
SALES NETWORK	İnanç Salman	GM, Trade	Representative Member
TÜMAKÜDER (Association of All Battery Importers and Manufacturers)	İnanç Salman	GM, Trade	Representative Member
EDİDER (Digitalization in Energy Association)	Burçin Açıkan	Deputy GM, Smart Systems	Representative Member
DEİK Turkey - Bulgaria Business Council	Nihat Türksever	Deputy GM, ZES Business Development	Representative Member
DEİK Turkey - Japan Business Council	Abdullah Çerekçi	Director, Zorlu Holding Strategy and Business Development	Representative Member
DEİK Foreign Investments Business Council	Abdullah Çerekçi	Director, Zorlu Holding Strategy and Business Development	Chairperson of the Executive Board
DEİK Turkey - Pakistan Business Council	Evren Evcit	Director, Solar and Overseas Investments	Vice Chairperson of the Executive Board
DEİK Turkey - Palestine Business Council	Evren Evcit	Director, Solar and Overseas Investments	Representative Member
DEİK Turkey - Indonesia Business Council	Evren Evcit	Director, Solar and Overseas Investments	Representative Member
KİD (Association of Corporate Communicators)	Funda Küçükosmanoğlu	Director, Marketing & Corporate Communications	Representative Member



Organizations and Institutions	Representatives	Position in the Company	Role in the Organization and Institution
ÖSGD (Private Sector Volunteers Association)	Funda Küçükosmanoğlu	Director, Marketing & Corporate Communications	Representative Member
SKD Turkey (Business and Sustainable Development Association)	Funda Küçükosmanoğlu	Director, Marketing & Corporate Communications	Representative Member
TÜHİD (Public Relations Association of Turkey)	Funda Küçükosmanoğlu	Director, Marketing & Corporate Communications	Representative Member
Corporate Responsibility Association of Turkey	Funda Küçükosmanoğlu	Director, Marketing & Corporate Communications	Representative Member
DEİK Turkey - Italy Business Council	Özlem Gelbal Uluşık	Director, Legal Affairs	Representative Member
TRAI (Turkey Artificial Intelligence Initiative)	Adnan Çomakoğlu	Manager, Next Generation Technologies	Representative Member
DEİK Turkey - Netherlands Business Council	Müge Dolay Giritli	Director, Legal Affairs	Representative Member
DEİK Turkey - Montenegro Business Council	Müge Dolay Giritli	Director, Legal Affairs	Representative Member
KalDer (Turkish Quality Association)	Tamer Soylu	Manager, QHSE	Representative Member
Turkish Industrialists and Businesspeople Association Environment and Climate Change Working Group	Tamer Soylu	Manager, QHSE Sr. Asst. Manager, QHSE	Representative Member
DEİK Turkey - Croatia Business Council	Zeynep Alemdaroğlu	Manager, Legal Affairs	Representative Member