DOĞAN ŞİRKETLER GRUBU HOLDİNG A.Ş.

2024 CDP Corporate Questionnaire 2024

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.
Terms of disclosure for corporate questionnaire 2024 - CDP

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10/11/2024, 02:24 pm

Contents

C1. Introduction

(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

Doğan Holding A.Ş., established in 1959, is one of Türkiye's largest and most diversified conglomerates. Our operations span multiple sectors, including electricity generation, industry, automotive trade, finance, internet, entertainment, and real estate, contributing significantly to the Turkish economy. As of 2023, we employ 7,935 people, and our wide-reaching group companies play a pivotal role in national employment and sustainable development. At the core of our sustainability strategy is the Doğan Impact Plan, a comprehensive, group-wide initiative that guides our activities towards creating positive environmental, social, and economic impacts. The plan reflects our commitment to integrating Environmental, Social, and Governance (ESG) principles into all aspects of our business, aligned with international frameworks such as the United Nations Sustainable Development Goals (SDGs) and the UN Principles for Responsible Investment (UNPRI), which we signed in 2023. By signing the UNPRI, we reaffirmed our commitment to sustainable investment strategies, governance processes, and long-term business resilience. Doğan Impact Plan Our sustainability strategy under the Doğan Impact Plan is structured around four key pillars: Climate Action and Decarbonization: We are committed to reducing our carbon footprint across our businesses, particularly in energy-intensive sectors like electricity generation and automotive. Our target is to achieve net-zero carbon emissions by 2050, with interim goals that include transitioning to renewable energy and improving energy efficiency across our operations. Resource Efficiency and Circular Economy: We aim to enhance resource efficiency by reducing waste, conserving natural resources, and applying circular economy principles across our value chains. This includes improving water management, minimizing waste generation, and promoting recycling and reuse practices throughout our business processes. Social Responsibility and Inclusivity: We are dedicated to promoting social sustainability through inclusive workplaces, equal opportunities, and social innovation. We actively engage with communities through various projects, particularly in education, health, and culture, ensuring that our business growth positively impacts society. Governance and Transparency: Strong governance is central to our sustainability strategy. We adhere to the highest standards of transparency and accountability, ensuring ESG factors are deeply embedded in our decision-making processes. Our Sustainability Committee oversees the implementation of these strategies and ensures that we meet our ambitious ESG goals. Sustainability Targets and Progress We have established clear sustainability targets under the Doğan Impact Plan. Our long-term goals include achieving net-zero carbon emissions by 2050, increasing the use of renewable energy, and enhancing resource efficiency in water, energy, and waste management. These targets are designed to ensure we meet global sustainability standards and contribute to a more sustainable future. Group-Wide Environmental Reporting Our sustainability reporting consolidates the environmental performance of all Doğan Group companies under one comprehensive framework. This group-wide approach ensures that our subsidiaries, regardless of industry, are aligned with our overarching sustainability goals. As a publicly traded company, we are committed to transparency and regularly disclose our sustainability performance, in line with Türkiye's public disclosure regulations. This ensures that our stakeholders are informed about our progress in reducing environmental impacts and achieving our sustainability targets. Continuous Improvement and Collaboration We are continuously evolving our strategies to address environmental challenges and improve our performance. Through the Doğan Impact Plan, we engage with our stakeholders, including customers, employees, and investors, ensuring that our sustainability goals align with

their expectations. Our strong governance structure and ongoing collaborations reinforce our efforts to create long-term value while minimizing environmental and social risks. A Forward-Looking Vision As we move forward, Doğan Holding remains steadfast in our commitment to sustainability, responsible investment, and value creation. Guided by the Doğan Impact Plan, we are determined to lead by example, not only in Türkiye but also on the global stage. By integrating ESG principles into every facet of our operations, we are building a sustainable, resilient business model that addresses the challenges of today while ensuring a brighter, more sustainable future for generations to come.
[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

12/30/2023

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

Select from:

☑ Yes

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

Select from:

☑ Yes

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

Select from:

☑ 1 year

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

Select from:

☑ 1 year

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

Select from:

☑ 1 year

[Fixed row]

(1.5) Provide details on your reporting boundary.

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

[Fixed row]

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

ISIN code - bond

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ Yes

(1.6.2) Provide your unique identifier

TRFDHOL92315

ISIN code - equity

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ Yes

(1.6.2) Provide your unique identifier

TRADOHOL91Q8

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

DOHOL.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:

☑ Yes

(1.6.2) Provide your unique identifier

789000J24Q4JM3H6UX22

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]

(1.24) 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

☑ Downstream 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

In alignment with our Doğan Impact Plan, we have a deep commitment to sustainable supply chain management, where we integrate environmental, social, and ethical criteria throughout our procurement processes. Our value chain mapping process focuses on enhancing traceability and accountability at every stage, particularly within the upstream (suppliers) and downstream (customers) aspects of our operations. This mapping helps us ensure that all critical stakeholders within our value chain are aligned with our sustainability goals, including responsible resource use, emissions reductions, and ethical practices. As of 2023, we have actively engaged with a total of 13,533 suppliers. Our mapping process has extended to Tier 2 suppliers, encompassing a broad scope of industries. Out of these, our strategic suppliers in terms of their materiality and spenditure are prioritized. After the prioritization process, 135 of our suppliers underwent detailed environmental and social audits. These audits are integral to ensuring compliance with our sustainability criteria and the long-term goals outlined in our impact plan. By evaluating and auditing strategic suppliers, we ensure they meet our strict environmental, social, and governance (ESG) standards, as well as ethical and labor rights regulations. To further enhance transparency, we engage our suppliers through a combination of surveys, audits, and training programs. We utilize advanced tools and digital platforms to track and manage sustainability performance across our supply chain. This includes regular reporting from our suppliers, which is integrated into our overall environmental performance metrics. (FUTURE TENSE) Our supplier engagement program has already seen tangible outcomes, with improvements in supplier environmental performance, reductions in emissions, and a broader implementation of best practices. Furthermore, our efforts help us anticipate risks related to resource scarcity, supply chain disruptions, and regulatory compliance, aligning with our broader business resilience strategies. In addition, we are currently in the process of mapping our Tier 3 suppliers to further expand our reach and ensure that our entire supply chain contributes to our sustainability goals. This ongoing effort reflects our commitment to sustainable development and responsible procurement, further solidifying our leadership position in corporate sustainability.
[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:

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

(1.24.1.2) Value chain stages covered in mapping

Select all that apply

☑ End-of-life management

(1.24.1.4) End-of-life management pathways mapped

Select all that apply

☑ Recycling

☑ Landfill

[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

Our short-term horizon is defined as 1 year, covering our OPEX and CAPEX plans in our annual financial budgets. In this timeframe, we primarily focus on optimizing operational efficiency and ensuring alignment with immediate sustainability targets. We also integrate short-term environmental risks and opportunities identified through our regular assessments, particularly those related to regulatory changes and immediate operational impacts such as resource efficiency improvements.

Medium-term

(2.1.1) From (years)

2

(2.1.3) To (years)

4

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

The medium-term is defined as 2-4 years, covering a time horizon aligned with our review and revision of Doğan Holding's business strategy. During this period, we actively assess the potential environmental risks and opportunities impacting our businesses. Strategic adjustments are made, such as capital allocation for environmental projects, integrating sustainability considerations in growth initiatives, and improving resource efficiency. Our focus is on mid-term sustainability commitments, including emission reductions and increasing renewable energy usage across our group companies.

Long-term

(2.1.1) From (years)

5

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

Select from:

☑ Yes

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

Our long-term horizon spans 5 years and beyond, and it is considered a significant period for embedding environmental sustainability into Doğan Holding's corporate system. Long-term goals include substantial reductions in GHG emissions, transitioning our energy use towards renewables, and achieving ambitious sustainability targets across our value chain. This period is crucial for strategic initiatives such as large-scale investments in sustainable technologies and meeting our long-term climate goals aligned with the Doğan Impact Plan.
[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:	*Select from:*

	Process in place	Dependencies and/or impacts evaluated in this process
	☑ Yes	☑ Both dependencies and impacts

[Fixed row]

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

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

[Fixed row]

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

Row 1

(2.2.2.1) Environmental issue

Select all that apply

☑ Climate change

☑ Water

☑ Plastics

☑ Biodiversity

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

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☑ Direct operations

☑ Upstream value chain

☑ Downstream value chain

(2.2.2.4) Coverage

Select from:

☑ Full

(2.2.2.5) Supplier tiers covered

Select all that apply

☑ Tier 1 suppliers

(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

International methodologies and standards

☑ Environmental Impact Assessment

☑ IPCC Climate Change Projections

☑ ISO 14001 Environmental Management Standard

(2.2.2.13) Risk types and criteria considered

Chronic physical

☑ Water stress

Policy

☑ Carbon pricing mechanisms

☑ Changes to international law and bilateral agreements

(2.2.2.14) Partners and stakeholders considered

Select all that apply

☑ Customers

☑ Employees

☑ Local communities

☑ 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

At Doğan Holding, we have established a robust and recurring process for identifying, assessing, and managing environmental dependencies, impacts, risks, and opportunities across our entire value chain. This process is critical to ensuring that our organization not only mitigates risks but also leverages opportunities in alignment with our Doğan Impact Plan and broader sustainability goals. Our assessment process is fully integrated into the company's risk management framework. This multi-disciplinary approach ensures that environmental risks and opportunities are considered alongside traditional financial and operational risks, providing a holistic view of the business's vulnerabilities and growth potential. We engage regularly with a broad range of stakeholders, including customers, employees, suppliers, and local communities, to inform our environmental strategy and decision-making. Coverage and Focus Areas: Climate Change: We assess our direct operations and both upstream and downstream value chains to identify how climate change may impact our business, including changes in regulatory environments, shifts in market demands, and potential physical risks such as extreme weather events. We consider both acute and chronic climate-related risks as part of this process. These risks are evaluated against their potential impact on our financial performance, operational continuity, and stakeholder relations. Water: Water is a critical resource in many of our business activities, and we actively manage our dependencies on water resources. We assess water availability, quality, and usage patterns, particularly in areas prone to water stress or scarcity. We evaluate our operations for potential impacts on local water sources and work with local communities to ensure sustainable water management practices. Plastics: Given our involvement in various industries, managing the risks associated with plastic production and disposal is an essential focus. We assess the environmental impact of plastics across the value chain, from production to end-of-life, ensuring that we minimize our plastic footprint through recycling initiatives, the adoption of biodegradable materials, and reducing single-use plastic consumption. Biodiversity: We recognize that biodiversity is essential to the resilience of ecosystems that support our business operations. We assess the potential impacts of our activities on local

biodiversity and work to mitigate negative outcomes through habitat conservation, reforestation, and sustainable land-use practices in collaboration with local stakeholders and environmental experts.
[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 Doğan Holding, we recognize the intricate interconnections between environmental dependencies, impacts, risks, and opportunities across our diverse operations, which span industries such as energy, media, retail, tourism, and manufacturing. To effectively assess and manage these interconnections, we have developed a comprehensive approach that integrates multiple environmental factors into our overall risk and opportunity management framework. Our assessment process is built upon the guidance of recognized international standards, such as the Task Force on Climate-related Financial Disclosures (TCFD) and the Sustainable Development Goals (SDGs). We consider the interdependencies between key environmental issues, including climate change, water security, biodiversity loss, and pollution management, throughout our entire value chain. These interconnections are especially critical in sectors where natural resource usage is high, such as our energy and tourism operations. In practice, we begin by identifying the primary environmental dependencies of each business unit, assessing how these dependencies interact with other environmental factors, and evaluating the cumulative risks and opportunities these interactions present. For example, in our energy sector, we assess how climate change impacts water availability, which in turn affects our power generation capacity. Similarly, in our tourism and real estate sectors, we evaluate how water management, biodiversity conservation, and climate resilience are closely interlinked and critical for the long-term sustainability of our operations. We incorporate these interconnections into the broader risk management process disclosed in 2.2.2. This approach allows us to evaluate the potential trade-offs between environmental risks and opportunities and helps to identify synergies that can enhance our resilience. For example, by investing in renewable energy solutions across our operations, we mitigate both our climate change risks and reduce our water usage, aligning with our broader sustainability objectives outlined in the Doğan Impact Plan. This holistic assessment approach enables us to better understand the cumulative impact of environmental risks and opportunities, ensuring that we are prepared to address complex, interconnected environmental challenges that may arise in the future. Additionally, this process informs our strategic decisions and enhances our ability to capitalize on emerging opportunities in the green economy.
[Fixed row]

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

(2.3.1) Identification of priority locations

Select from:

☑ Yes, we are currently in the process of identifying 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

(2.3.4) Description of process to identify priority locations

At Doğan Holding, we are currently in the process of identifying our priority locations, focusing on areas where our operations, both direct and across the value chain, interact with ecologically sensitive regions and areas of high environmental impact. This initiative will prioritize locations based on a multi-criteria assessment approach, which will incorporate several tools, data sources, and metrics to assess environmental dependencies, impacts, risks, and opportunities across each location. As part of this process, we will map all operational sites, including upstream and downstream value chain stages, to identify interfaces with nature-sensitive areas such as biodiversity hotspots, areas prone to water scarcity, and ecosystems that provide critical services (e.g., flood mitigation). The following steps will be taken: Data and Tools to be Used: We plan to leverage GIS mapping technologies, satellite imagery, and external data platforms (such as the World Resources Institute's Aqueduct Water Risk Atlas and IBAT) to assess geographical and environmental vulnerabilities. These datasets will be overlaid with our operational footprint to identify potential risk areas. Metrics and Indicators: For each location, we will assess biodiversity significance, water availability, flood risks, and ecosystem integrity. These metrics are critical in evaluating the environmental significance of each site and identifying potential vulnerabilities that could affect our business operations or supply chain. Thresholds for Sensitive Locations: Sensitive locations will be determined using thresholds for ecosystem decline, biodiversity richness, and environmental service dependency. For example, locations where water availability is under stress or areas identified as key biodiversity areas will be flagged as high-priority. Geographical Specificity: The assessments will be conducted at multiple levels—site-specific, regional, and national—depending on the extent of operations and the environmental impact in those areas. We will prioritize sensitive areas based on both operational footprint and local ecosystem needs. Future Plans for Continuous Improvement: In line with our sustainability strategy, we will continuously refine our process for identifying priority locations by incorporating real-time data and using enhanced predictive modeling tools. Our aim is to ensure that this process remains robust and adaptive to evolving environmental risks and opportunities. Once these methodologies are fully integrated, we will be well-positioned to identify areas where interventions are most needed, supporting our broader environmental and sustainability goals.

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

Select from:

☑ No, we do not have a list/geospatial map of priority locations

[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

In the case of risks, a 10% decrease in group-level Revenue is considered a substantive effect. The metrics used in this definition include the frequency of the effect occurring, the time horizon over which the effect occurs, and the likelihood of the effect occurring. Frequency of effect occurring: The risks are assessed annually as part of our financial and operational review process. Time horizon over which the effect occurs: Risks are assessed over short-, medium-, and long-term time horizons as defined in question 2.1 (1 year, 2–3 years, and 4 years, respectively). Substantive effects could manifest across these timeframes, depending on the severity and type of risk. Likelihood of effect occurring: Risks with a probability greater than 50% of leading to a 10% decrease in Revenue are considered substantive.

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

For opportunities, a 10% increase in group-level Revenue is considered a substantive effect. The metrics used in this definition include the same factors as risks: frequency of occurrence, time horizon, and likelihood. Frequency of effect occurring: Opportunities are assessed annually as part of our strategic planning cycle. Time horizon over which the effect occurs: Opportunities are evaluated over short-, medium-, and long-term horizons, similar to risks. Opportunities with substantive financial impact are expected to realize within these timeframes based on strategic initiatives. Likelihood of effect occurring: Opportunities with a more than 50% likelihood of increasing Revenue by 10% or more are deemed substantive.
[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:

☑ No, we do not identify and classify our potential water pollutants

(2.5.3) Please explain

Doğan Holding recognizes the importance of identifying and classifying potential water pollutants associated with our activities, considering their potential impact on water ecosystems and human health. Currently, we are in the process of enhancing our water management practices, and one of our upcoming priorities is to identify and assess these pollutants systematically.While we are yet to identify and classify such pollutants, we adhere to the regulations and guidelines set forth by relevant authorities. By complying with these regulations, we aim to minimize any potential negative effects on water quality and ecosystems. Our commitment to adhering to these standards demonstrates our responsible approach to water management and our dedication to environmental stewardship.
[Fixed 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

We have identified some environmental risks associated with the use and disposal of plastics in certain operations across our value chain. However, these risks are currently not anticipated to have a substantive effect on our organization. This conclusion is based on our ongoing efforts to implement sustainable practices, such as reducing plastic use, integrating recycled materials, and enhancing waste management systems. These measures effectively mitigate potential financial and operational risks. Additionally, plastics usage does not represent a significant part of our core operations or products, and therefore, does not pose a substantive financial risk at the group level based on our 10% Revenue decrease threshold.
[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

☑ Carbon pricing mechanisms

(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

Doğan Holding's industrial group companies, particularly those operating in energy-intensive sectors, face significant risks from carbon pricing mechanisms such as the EU's Carbon Border Adjustment Mechanism (CBAM) and the forthcoming Türkiye Emissions Trading Scheme (ETS). These regulatory developments will require our businesses to account for their carbon emissions, translating into additional operational costs, especially for companies with high carbon footprints. In particular, sectors such as energy, automotive, and industrial manufacturing will need to purchase carbon credits or invest in emission reduction technologies to remain compliant with emerging regulations. The financial impact of these mechanisms is expected to increase over time, as regulatory requirements tighten and carbon prices rise. This will challenge our ability to maintain competitive pricing and profitability, particularly in international markets where carbon-related costs will play a larger role in determining market access and competitiveness.

(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

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

Select from:

☑ Virtually certain

(3.1.1.14) Magnitude

Select from:

☑ Low

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

The anticipated financial impact of carbon pricing mechanisms, such as the EU CBAM and Türkiye ETS, is expected to increase operating costs significantly over the short to medium term. As carbon prices rise and regulations tighten, Doğan Holding's industrial companies will likely face increased costs for carbon credits,

emissions reporting, and emission reduction technologies. In the medium term, the impact on cash flows will be notable, with operating margins shrinking due to rising compliance costs. Over the long term, there could be significant pressure on the profitability of our industrial businesses, particularly those in energy-intensive sectors like manufacturing and energy production. The cost of non-compliance or delays in transitioning to lower-carbon operations could result in additional penalties or reduced market competitiveness, further exacerbating the financial strain.

(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)

1000000

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

1500000

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

2000000

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

4000000

(3.1.1.25) Explanation of financial effect figure

The financial impact was calculated by estimating the increased costs of compliance with carbon pricing mechanisms like CBAM and Türkiye ETS. These include costs associated with carbon credits, compliance monitoring, and reporting, which will impact the operating costs of our manufacturing subsidiaries. The minimum and maximum figures reflect the range of possible carbon pricing fluctuations and the company's projected emission levels over the next few years. Inflation and the evolving carbon market in Türkiye were factored into these estimates.

(3.1.1.26) Primary response to risk

Policies and plans

☑ Develop a climate transition plan

(3.1.1.27) Cost of response to risk

1200000

(3.1.1.28) Explanation of cost calculation

This cost covers the development and implementation of a climate transition plan, which includes hiring external consultants to conduct carbon footprint assessments, internal resource allocation for research and planning, and investments in low-carbon technologies. The cost was estimated based on the average consultancy fees for transition planning and the required capital expenditures for initial steps in carbon reduction.

(3.1.1.29) Description of response

The climate transition plan aims to ensure that Doğan Holding can gradually reduce its carbon footprint and align with Türkiye's ETS and the EU's CBAM regulations. The plan includes setting reduction targets, identifying opportunities for energy efficiency, renewable energy investments, and carbon offset programs. This proactive approach will help mitigate the long-term financial impacts of carbon pricing while positioning the company as a leader in sustainable practices.

Water

(3.1.1.1) Risk identifier

Select from:

☑ Risk2

(3.1.1.3) Risk types and primary environmental risk driver

Chronic physical

☑ Water stress

(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

☑ Other, please specify **:**All relevant river basins located in Türkiye.

(3.1.1.9) Organization-specific description of risk

Water scarcity is an increasingly critical issue across Türkiye, where Doğan Holding operates several industrial and agricultural businesses. Water-intensive sectors, such as energy production (cooling processes) and agriculture, are particularly vulnerable to this risk. Water stress, exacerbated by climate change, could significantly disrupt production and operational capacity, especially in regions prone to drought. The cost of securing alternative water sources or investing in water-efficient technologies is likely to increase operating costs over the medium to long term. Furthermore, the potential for government regulation on water use and management could impose further financial pressures. In addition to operational challenges, water scarcity could also impact employee welfare, particularly in regions where water availability is directly linked to local livelihoods.

(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

☑ 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

Water stress in Türkiye, especially in water-intensive sectors, could have both direct and indirect financial impacts on Doğan Holding's operations. In the short term, disruptions to water supply could reduce production capacity, leading to revenue losses in affected business units. In the medium term, the need to invest in alternative water sources, water-efficient technologies, and infrastructure upgrades will increase capital expenditures, placing downward pressure on cash flows and profitability. Over the long term, if water scarcity persists or intensifies, regulatory restrictions or government-imposed water usage limits could further constrain operations, leading to sustained operational inefficiencies and increased costs, significantly impacting both EBITDA and net profits.

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

Select from:

☑ Yes

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

2000000

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

4000000

(3.1.1.25) Explanation of financial effect figure

The long-term financial impact was determined based on the potential disruptions to our operations due to water scarcity in drought-prone areas. Costs were estimated by analyzing historical data on water-related production halts, increased water sourcing costs, and investments required to secure alternative water supplies. The figures account for potential impacts on operational efficiency, costs of infrastructure to reduce water consumption, and the need for water recycling systems.

(3.1.1.26) Primary response to risk

Infrastructure, technology and spending

☑ Adopt water efficiency, water reuse, recycling and conservation practices

(3.1.1.27) Cost of response to risk

800000

(3.1.1.28) Explanation of cost calculation

The estimated cost includes investments in water-efficient technologies, installation of water recycling systems, and implementation of water conservation measures at Doğan Holding's industrial facilities. These costs were calculated by analyzing the capital expenditure required to upgrade existing water infrastructure and the ongoing operational costs for maintaining these systems.

(3.1.1.29) Description of response

Doğan Holding will adopt a comprehensive water management strategy that focuses on improving water efficiency and reuse. This includes upgrading equipment to reduce water consumption, installing recycling systems to treat and reuse wastewater, and implementing site-specific water conservation measures. These initiatives will ensure operational resilience in water-scarce regions while reducing dependence on external water sources.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk3

(3.1.1.3) Risk types and primary environmental risk driver

Market

☑ Changing customer behavior

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Downstream value chain

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ Turkey

(3.1.1.9) Organization-specific description of risk

Doğan Holding's automotive subsidiary, D-trend, which currently imports gasoline and electric vehicles, may face a growing pressure from changing customer behavior regarding the environmental and ethical standards in the production of electric vehicle (EV) batteries. As the global transition to 100% electric vehicles accelerates, particularly in Europe, D-trend may be under pressure to ensure that not only are EVs imported from China fully electric but that their batteries are produced under environmentally sound and ethically acceptable conditions. Concerns have emerged about cobalt mining in EV battery production, with reports showing workers extracting cobalt in unsafe and unethical conditions, such as with bare hands and child labor around the world. These issues have raised significant concerns especially among European consumers, and potential regulatory frameworks may require stricter compliance with human rights and environmental standards. As an emerging economy with direct trade relationship with EU, Türkiye may see the reflections of these stricter regulations. Failure to meet these evolving demands could result in negative publicity, consumer boycotts, and a decline in market share. Consequently, this risk could have a direct impact on revenues, market share, and the reputation of D-trend in the long term.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Decreased revenues due to reduced demand for products and services

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

Select all that apply

☑ Medium-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

Changing customer behavior presents a substantial financial risk to Doğan Holding's automotive business, D-trend, particularly in its ability to adapt to the rapidly growing EV market. If D-trend fails to meet the expectations of environmentally conscious customers and comply with future European regulations on ethical battery production, it risks losing significant market share in the medium term. Specifically, the company may face decreased revenue from B2B clients and downstream partners, such as those in the plastics or automotive supply chain, as they transition towards products with minimal environmental impact. Additionally, reputational damage stemming from non-compliance with environmental and ethical standards could lead to customer attrition and long-term financial losses. It is anticipated that this risk could decrease revenues in the medium term as customer preferences shift towards fully electric and ethically produced vehicles. Failure to transition the product portfolio and engage effectively with customers could result in reduced sales, lower profitability, and cash flow disruptions.

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

Select from:

☑ Yes

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

600000

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

1200000

(3.1.1.25) Explanation of financial effect figure

The financial effect figures were calculated based on the anticipated decrease in market share and revenues, as well as the potential for reputational damage that could impact D-trend's automotive business. A reduction of up to 10% in revenue over the medium term was estimated, reflecting the growing customer demand for fully electric vehicles and the ethical production of EV batteries. The cost of transitioning to compliant products, including ensuring that EV batteries meet European sustainability standards, has also been factored into the figures. Additionally, the costs associated with reputational damage and potential market boycotts have been included in the financial effect estimate. This estimate assumes that without timely adaptation to customer demands and regulatory changes.

(3.1.1.26) Primary response to risk

Engagement

☑ Engage with customers

(3.1.1.27) Cost of response to risk

500000

(3.1.1.28) Explanation of cost calculation

This figure covers the increased costs associated with market research, customer engagement, and realignment of business practices to address ethical and environmental concerns. The cost also includes investments in due diligence processes with supply chain partners in China, ensuring compliance with European environmental and human rights standards in EV battery production. Additionally, it accounts for marketing campaigns to communicate Doğan Holding's commitment to these standards.

(3.1.1.29) Description of response

Doğan Holding, through its automotive subsidiary D-trend, is focusing on addressing the growing consumer and regulatory demands around the production of electric vehicles, particularly the ethical and environmental concerns surrounding battery production. There is a significant shift in customer behavior as awareness of the environmental and social impacts of EV battery production increases. Reports of cobalt mining, especially the use of child labor and unsafe working conditions in the extraction process, have heightened consumer sensitivity. To mitigate the risk of losing customers due to these concerns, Doğan Holding will engage with its customers and business partners to ensure that all imported EVs, particularly those sourced from China, meet stringent European environmental and ethical standards. This includes ensuring that batteries are produced in facilities that comply with sustainability regulations and human rights norms. The response will focus on transparent communication with customers, ensuring them that D-trend's electric vehicle offerings are not only environmentally friendly but also ethically sourced, particularly in terms of battery production. This strategy is essential to maintaining customer trust and preventing potential boycotts or market share losses as consumer behavior shifts towards more conscientious purchasing decisions. The company will also work closely with its Chinese partners to ensure compliance with emerging European standards on battery production and ethical labor practices. By doing so, Doğan Holding can safeguard its business model against future disruptions and align with evolving customer preferences for more sustainable and ethically produced vehicles.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk4

(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, such as floods, storms, and heatwaves, present significant risks to Doğan Holding's operations across Türkiye. Our industrial and energy production sites are particularly vulnerable to disruptions caused by these events, which could lead to operational shutdowns, damage to infrastructure, and increased repair and insurance costs. As climate change continues to drive more frequent and severe weather events, the likelihood of such disruptions is expected to increase. This poses a direct threat to our production capacity and financial stability. Over the medium to long term, we anticipate needing to allocate substantial capital towards reinforcing our infrastructure and investing in climate-resilient technologies to mitigate these risks. These expenses will likely reduce profitability and increase operational costs, particularly for our energy and industrial companies.

(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

☑ Medium-term

☑ Long-term

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

Select from:

☑ Very 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

Increased frequency and severity of extreme weather events pose a direct threat to Doğan Holding's infrastructure and operations. In the short term, weather-related disruptions could lead to operational shutdowns and reduced production capacity, translating into immediate revenue losses and higher repair costs. In the medium term, we expect to see rising insurance premiums and capital expenditures associated with climate-resilient infrastructure and technologies, putting pressure on profitability and cash flows. Long-term effects could include permanent changes in operational processes to mitigate future risks, which will likely require ongoing investment and reduce the overall operational efficiency of the affected businesses. Such expenditures may limit the company's ability to pursue other growth opportunities.

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

Select from:

☑ Yes

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

1000000

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

1500000

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

3000000

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

5000000

(3.1.1.25) Explanation of financial effect figure

The financial impact figures reflect the costs associated with operational disruptions and infrastructure damage from extreme weather events. The medium-term estimates were based on past instances of severe weather disruptions to our operations and the anticipated increase in frequency and intensity of these events. Long-term costs consider investments in adaptation measures, such as flood barriers, and the potential need for relocation of key infrastructure to safer areas.

(3.1.1.26) Primary response to risk

Infrastructure, technology and spending

☑ Other infrastructure, technology and spending, please specify **:**Increase CAPEX related to climate change adaptation practices.

(3.1.1.27) Cost of response to risk

2500000

(3.1.1.28) Explanation of cost calculation

The cost includes investments in resilient infrastructure, such as flood barriers, stormwater management systems, and reinforcements to existing facilities in high-risk regions. It also covers technological upgrades for better weather forecasting and early warning systems. The figure is based on the capital expenditure for infrastructure projects, as well as the cost of technological solutions for disaster preparedness.

(3.1.1.29) Description of response

Doğan Holding will implement a series of infrastructure upgrades and technological solutions to protect its facilities from extreme weather events. This includes building flood defenses, improving drainage systems, and reinforcing vulnerable structures. Additionally, the company will invest in advanced weather prediction tools to provide early warnings and allow for preemptive action during extreme weather events.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk5

(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

The introduction of Türkiye's new Sustainability Reporting Standards (TSRS S1 and S2), which will apply to our publicly listed companies, will significantly alter our reporting obligations and potentially increase compliance costs. These new regulations will require more comprehensive disclosures of environmental performance, including emissions data and climate-related risks. For Doğan Holding, the implementation of these standards over the next two years will require significant investments in upgrading our reporting systems, training personnel, and integrating sustainability data across multiple business units. While these regulations aim to improve transparency and environmental governance, the additional compliance requirements will impose indirect costs on our listed companies. The financial implications could be substantial, particularly if these requirements necessitate capital expenditures to enhance environmental performance or meet stricter regulatory thresholds in emissions reporting.

(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

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

Select from:

☑ Virtually certain

(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

Compliance with Türkiye's Sustainability Reporting Standards (TSRS S1 and S2) will impose new reporting obligations on Doğan Holding's publicly listed companies, increasing administrative and operational costs in the short term. Over the medium term, the financial impact will become more pronounced as investments in reporting systems, personnel training, and compliance infrastructure increase. The potential for fines or penalties due to non-compliance could further exacerbate these costs. Long-term, the requirements could drive innovation in sustainability performance, which may improve competitiveness but also requires substantial upfront capital investment. This could limit cash flow flexibility and negatively affect the company's financial position if operational efficiencies or cost savings are not achieved as expected.

(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)

500000

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

1000000

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

1500000

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

2500000

(3.1.1.25) Explanation of financial effect figure

The financial impact figures for compliance with new sustainability regulations were calculated by estimating the costs associated with upgrading our reporting and monitoring systems, employee training, and the integration of sustainable practices into our existing operations. The short-term impacts represent the initial setup costs for compliance, while medium-term figures account for the ongoing maintenance and potential penalties for non-compliance.

(3.1.1.26) Primary response to risk

Policies and plans

☑ Develop a climate transition plan

(3.1.1.27) Cost of response to risk

1000000

(3.1.1.28) Explanation of cost calculation

The cost includes setting up new systems for compliance with Türkiye's TSRS S1 and S2 reporting standards, training employees, and hiring external experts to develop and execute a comprehensive sustainability reporting framework. The figure reflects the one-time setup costs as well as the ongoing costs of compliance and reporting over the short to medium term.

(3.1.1.29) Description of response

Doğan Holding will develop and implement a climate transition plan that aligns with Türkiye's new sustainability reporting standards. The plan includes investing in environmental data collection systems, conducting sustainability audits, and integrating sustainable practices into business operations. This response ensures that the company remains compliant with national legislation while minimizing the financial risks of non-compliance penalties.
[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)

14300000

(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)

6500000

(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

Amount of revenues are derived from the sum of values defined for transition and physical risks for each time horizon. These values are divided into our revenue figure we've disclosed in Module 1.

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)

4000000

(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

Amount of revenues are derived from the sum of values defined for transition and physical risks for each time horizon. These values are divided into our revenue figure we've disclosed in Module 1.
[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 **:**All relevant river basins located in Türkiye for 2 of our facilities (Kelkit & Niğde)

(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:

☑ 1-25%

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

Select from:

☑ 1-10%

(3.2.11) Please explain

Doğan Holding operates in regions where water scarcity and water-related risks are significant, primarily due to the geographical location of several facilities. These regions are prone to water stress, droughts, and, in some cases, flooding due to climate change and other environmental factors. The facilities identified within these river basins play a crucial role in the group's overall production, and their exposure to water-related risks may potentially disrupt operations, leading to significant revenue losses. The percentage of global revenue that could be impacted is primarily driven by the dependency on water for operational processes, especially in sectors like manufacturing and agriculture. Operational disruptions caused by water shortages or poor water quality could result in delays, increased operational costs due to alternative water sourcing, or even temporary shutdowns. To mitigate these risks, Doğan Holding has implemented water management strategies, including the adoption of water-efficient technologies, water recycling, and reuse practices, along with contingency planning for extreme weather events. However, the risk remains significant without adequate investment in long-term water resilience initiatives. In the identified regions, 2 facilities (located in Kelkit and Niğde) face water-related risks, representing between 1-10% of total global revenue. These facilities are key contributors to our operational output, and ensuring their water security remains a priority for Doğan Holding in both the short and medium term. Additionally, we continue to assess our water risk exposure and will integrate any further developments into our risk management strategies.

[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

Doğan Holding has implemented a comprehensive environmental management system across its subsidiaries to ensure compliance with all relevant water-related regulations. We proactively monitor water use and discharge, adopting best practices to minimize any potential environmental impacts. Regular audits and inspections are conducted to maintain adherence to local and international standards. Additionally, employee training programs are in place to ensure that all team members are well-versed in water management policies and regulatory requirements, preventing any breaches. As a result, no water-related regulatory violations were recorded in the reporting year.
[Fixed row]

(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:* ☑ Yes, we have identified opportunities, and some/all are being realized
Water	*Select from:* ☑ 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:

☑ Opp1

(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

(3.6.1.8) Organization specific description

One of our subsidiaries, GalataWind, operates within the electric utilities sector and has successfully built a fully renewable energy portfolio. With a strong focus on wind energy, GalataWind generates significant carbon credits as part of its operations. The increasing demand for carbon credits, particularly from organizations looking to offset their emissions, positions GalataWind to seize new revenue streams in this growing market. This provides a substantial financial opportunity for Doğan Holding, as we are well-positioned to meet the rising global demand for renewable energy solutions and carbon neutrality.

(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

☑ Medium-term

☑ Long-term

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

Select from:

☑ Very likely (90–100%)

(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

With the global increase in demand for carbon credits, particularly among organizations striving to meet their emission reduction targets, the revenue generated from selling carbon credits is expected to have a medium-term positive impact on Doğan Holding's cash flows and financial performance. This opportunity will lead to an increased revenue stream for our subsidiary GalataWind, thus enhancing the financial position of the holding group in the medium and long term.

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

Select from:

☑ Yes

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

2000000

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

5000000

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

4000000

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

8000000

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

7000000

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

12000000

(3.6.1.23) Explanation of financial effect figures

The short-term figures reflect the early-stage growth in carbon credit markets as companies and governments aim to meet sustainability goals. Medium-term and long-term figures reflect expanding carbon markets driven by regulatory mandates, consumer preferences, and international carbon pricing schemes.

(3.6.1.24) Cost to realize opportunity

1000000

(3.6.1.25) Explanation of cost calculation

The cost includes maintaining certification for carbon credits, complying with new regulatory requirements, and managing operational expenses related to optimizing carbon generation.

(3.6.1.26) Strategy to realize opportunity

We aim to fully capitalize on GalataWind's renewable portfolio by maximizing the value of carbon credits. We will focus on maintaining international certifications, ensuring compliance with carbon credit trading standards, and fostering strategic partnerships for greater market access.

Water

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp2

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Reputational capital

☑ Improved ratings by sustainability/ESG indexes

(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

(3.6.1.6) River basin where the opportunity occurs

Select all that apply

☑ Unknown

(3.6.1.8) Organization specific description

As part of our comprehensive sustainability efforts under the Doğan Impact Plan, we have set an ambitious target to achieve 100% water recovery across our operations. This target is highly regarded by sustainability index providers and contributes to our group's strong reputation in the environmental performance space. By achieving this target, Doğan Holding not only reduces water-related risks but also gains recognition from ESG rating agencies, which enhances our profile and opens up new avenues for sustainable investments and partnerships. The reputation gained from this achievement significantly contributes to our group's overall sustainability strategy.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Other, please specify **:**Increased brand value

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

Select all that apply

☑ Long-term

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

Select from:

☑ More likely than not (50–100%)

(3.6.1.12) Magnitude

Select from:

☑ Unknown

(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

Achieving 100% water recovery will provide a reputational boost to Doğan Holding, with a minimal but positive financial effect in the medium term. The enhanced reputation will improve our sustainability ratings, which could attract more socially conscious investors and improve access to ESG-aligned financing options. This opportunity will help maintain positive investor sentiment and stable cash flows, but its direct effect on financial performance will be moderate compared to other larger-scale sustainability initiatives.

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

Select from:

☑ Yes

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

1000000

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

3000000

(3.6.1.23) Explanation of financial effect figures

Financial impact reflects the long-term reputational and financial benefits of enhanced ESG ratings. Improved water management will lead to better sustainability rankings, making Doğan Holding more attractive to ESG-focused investors, potentially increasing share prices and reducing capital costs.

(3.6.1.24) Cost to realize opportunity

500000

(3.6.1.25) Explanation of cost calculation

This cost reflects the installation of water recovery systems and achieving sustainability certifications. It also includes operational and management costs required to maintain compliance with water recovery targets.

(3.6.1.26) Strategy to realize opportunity

By implementing the Doğan Impact Plan and focusing on 100% water recovery, we will position ourselves as an ESG leader. This will help in enhancing our reputation and securing long-term investments tied to ESG ratings.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp3

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Capital flow and financing

☑ Access to sustainability linked loans

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Upstream value chain

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ Turkey

(3.6.1.8) Organization specific description

Through our ongoing commitment to sustainability, Doğan Holding has built a strong case for accessing sustainability-linked loans. These loans offer more favorable interest rates and conditions, reflecting our alignment with environmental and social goals. By presenting robust evidence of our achievements in reducing carbon emissions and meeting sustainability benchmarks, we are positioned to engage financial service actors such as banks and leasing companies. This access to sustainable finance will lower our cost of capital and enhance our financial flexibility, making it easier to finance our decarbonization projects and other sustainability initiatives.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Increased access to capital at lower/more favorable rates

(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

☑ Long-term

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

Select from:

☑ Very likely (90–100%)

(3.6.1.12) Magnitude

Select from:

☑ 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

Access to sustainability-linked loans will have a significant positive impact on Doğan Holding's financial performance by reducing our cost of capital and enhancing financial flexibility in the short to medium term. With reduced financing costs, we can allocate more resources to decarbonization projects and sustainability initiatives, ultimately driving long-term growth and profitability. This opportunity will improve our financial position by lowering debt-related expenses and increasing available capital for strategic investments.

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

Select from:

☑ Yes

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

4000000

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

8000000

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

7000000

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

15000000

(3.6.1.23) Explanation of financial effect figures

As Doğan Holding advances toward its sustainability targets, it will become eligible for more favorable loan conditions. These estimates represent the financial impact of securing lower interest rates and accessing sustainability-linked financial products.

(3.6.1.24) Cost to realize opportunity

2000000

(3.6.1.25) Explanation of cost calculation

The cost covers investments in renewable energy projects, decarbonization efforts, and meeting the necessary certifications to access sustainability-linked loans. It also includes ongoing monitoring and reporting of emissions reductions.

(3.6.1.26) Strategy to realize opportunity

Our strategy is to meet the sustainability criteria required to qualify for favorable loan terms. This includes reducing emissions, increasing renewable energy capacity, and ensuring compliance with sustainability-linked financial products' requirements.
[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)

48000000

(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

Amount of revenues are derived from the sum of values defined for opportunities for each time horizon. These values are divided into our revenue figure we've disclosed in Module 1.

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)

3000000

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

Select from:

☑ Less than 1%

(3.6.2.4) Explanation of financial figures

Amount of revenues are derived from the sum of values defined for opportunities for each time horizon. These values are divided into our revenue figure we've disclosed in Module 1.
[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:

☑ No

[Fixed row]

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

Climate change

(4.1.1.1) Board-level oversight of this environmental issue

Select from:

☑ Yes

Water

(4.1.1.1) Board-level oversight of this environmental issue

Select from:

☑ Yes

Biodiversity

(4.1.1.1) Board-level oversight of this environmental issue

Select from:

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

(4.1.1.2) Primary reason for no board-level oversight of this environmental issue

Select from:

☑ Other, please specify **:**Madencilik / in progress

(4.1.1.3) Explain why your organization does not have board-level oversight of this environmental issue

Currently, Doğan Holding is in the process of integrating biodiversity into its board-level oversight practices. Recognizing the growing importance of biodiversity and its impact on both the environment and business sustainability, Doğan Holding plans to include biodiversity considerations as part of its governance framework within the next two years. The goal is to ensure that the board actively oversees and guides the company's strategies related to biodiversity, including monitoring risks and opportunities and aligning these efforts with broader sustainability objectives.
[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

☑ Director on board

☑ Chief Executive Officer (CEO)

☑ Board-level 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

☑ Board mandate

☑ Individual role descriptions

(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 scenario analysis

☑ Overseeing the setting of corporate targets

☑ Monitoring progress towards corporate targets

☑ Approving corporate policies and/or commitments

☑ Monitoring the implementation of the business strategy

☑ Overseeing and guiding public policy engagement

☑ Overseeing and guiding public policy engagement

☑ Reviewing and guiding innovation/R&D priorities

☑ Approving and/or overseeing employee incentives

☑ Overseeing and guiding major capital expenditures

☑ Overseeing reporting, audit, and verification processes

☑ Monitoring the implementation of a climate transition plan

☑ Overseeing and guiding the development of a business strategy

☑ Overseeing and guiding acquisitions, mergers, and divestitures

☑ Monitoring supplier compliance with organizational requirements

☑ Monitoring compliance with corporate policies and/or commitments

☑ Overseeing and guiding the development of a climate transition plan

☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

(4.1.2.7) Please explain

The governance mechanisms selected for climate change issues at Doğan Holding are integrated into the organization's overall board oversight processes. The board oversees the development of a climate transition plan, monitors progress towards corporate targets, and reviews strategies related to decarbonization and energy transition. The Chief Executive Officer (CEO), board chair, and dedicated board-level committees frequently engage in scenario analysis and strategic reviews to mitigate climate-related risks and leverage associated opportunities, particularly in renewable energy investments and low-carbon technology initiatives. Each quarter, the board receives detailed reports from department heads on progress toward achieving climate-related targets, ensuring that strategic initiatives are aligned with global climate action goals.

Water

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

Select all that apply

☑ Board chair

☑ Director on board

☑ Chief Executive Officer (CEO)

☑ Board-level 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

☑ Board mandate

☑ Individual role descriptions

(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 scenario analysis

☑ Overseeing the setting of corporate targets

☑ Monitoring progress towards corporate targets

☑ Approving corporate policies and/or commitments

☑ Monitoring the implementation of the business strategy

☑ Overseeing reporting, audit, and verification processes

☑ Monitoring the implementation of a climate transition plan

☑ Overseeing and guiding the development of a business strategy

☑ Overseeing and guiding acquisitions, mergers, and divestitures

☑ Monitoring supplier compliance with organizational requirements

☑ Monitoring compliance with corporate policies and/or commitments

☑ Overseeing and guiding the development of a climate transition plan

☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

☑ Overseeing and guiding public policy engagement

☑ Overseeing and guiding public policy engagement

☑ Reviewing and guiding innovation/R&D priorities

☑ Approving and/or overseeing employee incentives

☑ Overseeing and guiding major capital expenditures

(4.1.2.7) Please explain

Water-related issues are integrated into Doğan Holding's governance framework under the oversight of the same committees responsible for environmental management. This includes monitoring supplier compliance, water efficiency programs, and conservation initiatives in both direct operations and the broader value chain. The board ensures that Doğan Holding's operational water usage complies with global water stewardship standards, with special attention given to regions

where water stress is a potential risk. Regular audits and assessments are presented to the board annually, where progress on water-related goals, such as reduction in water use intensity and improved water recycling processes, is reviewed and actioned upon when necessary.
[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

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

(4.2.3) Environmental expertise of the board member

Additional training

☑ Training in an environmental subject by a certified organization, please specify **:**Cambridge Sustainability Leadership Programme

Experience

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

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

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

(4.2.3) Environmental expertise of the board member

Additional training

☑ Training in an environmental subject by a certified organization, please specify **:**Cambridge Sustainability Leadership Programme

Experience

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

[Fixed row]

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

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

	Management-level responsibility for this environmental issue
	☑ Yes

[Fixed row]

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

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Executive Officer (CEO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

☑ Managing engagement in landscapes and/or jurisdictions

☑ 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 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)

(4.3.1.4) Reporting line

Select from:

☑ Reports to the board directly

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

Select from:

☑ Quarterly

(4.3.1.6) Please explain

The Chief Executive Officer (CEO) plays a critical role in overseeing Doğan Holding's climate-related responsibilities. The CEO is directly responsible for ensuring the organization's business strategy, risk management, and corporate policies reflect climate-related concerns. This involves overseeing progress towards environmental targets and reporting regularly to the board. Through direct reporting lines, the CEO provides updates quarterly, ensuring that climate-related strategies are fully integrated into both day-to-day operations and long-term planning. These processes include monitoring innovation priorities, acquisition strategies, and environmental impacts of the group's projects and investments.

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

☑ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

☑ Managing engagement in landscapes and/or jurisdictions

☑ 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

☑ Managing annual budgets related to environmental issues

☑ Implementing the business strategy related to environmental issues

☑ 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)

(4.3.1.4) Reporting line

Select from:

☑ Reports to the board directly

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

Select from:

☑ Quarterly

(4.3.1.6) Please explain

Similar to the responsibilities held for climate change, the CEO is accountable for water-related matters at Doğan Holding. This includes overseeing the company's adherence to water-related corporate policies and ensuring progress towards water sustainability targets. As part of Doğan's water management strategy, the CEO ensures the integration of water-related issues into business operations, risk assessments, and financial planning. Water management is reported to the board quarterly, with a focus on compliance, impact analysis, and ensuring water efficiency within the group's diverse operations.

Biodiversity

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Executive Officer (CEO)

(4.3.1.2) Environmental responsibilities of this position

Engagement

☑ Managing engagement in landscapes and/or jurisdictions

☑ Managing public policy engagement related to environmental issues

Policies, commitments, and targets

☑ Setting corporate environmental policies and/or commitments

☑ Setting corporate environmental targets

Strategy and financial planning

☑ Developing a business strategy which considers environmental issues

☑ Managing annual budgets 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)

(4.3.1.4) Reporting line

Select from:

☑ Reports to the board directly

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

Select from:

☑ Quarterly

(4.3.1.6) Please explain

Biodiversity is a growing focus within Doğan Holding's environmental strategy. The CEO is responsible for ensuring that biodiversity initiatives are embedded within the company's overall sustainability approach. This includes overseeing policies that aim to mitigate biodiversity loss and environmental degradation caused by business activities. The CEO ensures that biodiversity considerations are part of key operational and strategic decisions, reporting to the board directly and providing updates on biodiversity targets on a quarterly basis. As Doğan Holding seeks to further integrate biodiversity into its environmental commitments, future targets and biodiversity initiatives are expected to be an important part of the group's agenda.

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

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)

(4.3.1.4) Reporting line

Select from:

☑ Reports to the board directly

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

Select from:

☑ Quarterly

(4.3.1.6) Please explain

The Sustainability Committee, chaired by a senior-level individual, is tasked with developing and implementing the climate transition plan for Doğan Holding. This committee ensures that climate risks and opportunities are assessed, targets are set, and progress is made in line with global environmental standards. The committee's responsibilities include coordinating sustainability efforts across departments and ensuring that corporate climate policies are followed. The committee reports quarterly to the board, ensuring that climate-related matters remain a key focus for the entire organization. This committee also works on integrating climate-related requirements in innovation, product development, and M&A activities.

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ President

(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

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:

☑ Other, please specify **:**Reports to the Sustainability Committee directly

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

Select from:

☑ Quarterly

(4.3.1.6) Please explain

The President, overseeing the sustainability efforts of Doğan Holding, ensures that climate-related objectives are met at both the operational and strategic levels. The President collaborates with the board and the sustainability committee to align the organization's actions with its climate commitments. Reporting quarterly to the board, the President ensures that environmental targets are met, corporate policies are adhered to, and progress is regularly reviewed. In cases where specific climate-related decisions, such as large capital expenditures or new acquisitions, require board approval, the President facilitates these discussions, providing key data on the organization's climate performance.
[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

5

(4.5.3) Please explain

Doğan Holding includes monetary incentives for senior leadership, including the CEO, CFO, Business Development Executives, CHRO, and Sustainability President, for achieving environmental performance objectives linked to climate-related initiatives. These incentives are aligned with the overall sustainability strategy of the group. The key focus is on driving the adoption of environmentally friendly business models and decarbonization efforts across the organization, with a particular emphasis on emissions reductions and energy efficiency improvements.

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

5

(4.5.3) Please explain

In line with Doğan Holding's commitment to sustainability, monetary incentives for water management and conservation are tied to senior leadership roles. The CEO, CFO, Business Development Executives, CHRO, and Sustainability President have specific goals aimed at improving water efficiency and reducing water usage across the group's operations. This incentivization ensures accountability at the highest level and supports the continuous advancement of the group's environmental management practices, with a focus on water conservation and responsible water usage across business units.
[Fixed row]

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

Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☑ Chief Executive Officer (CEO)

(4.5.1.2) Incentives

Select all that apply

☑ Bonus - % of salary

(4.5.1.3) Performance metrics

Targets

☑ Progress towards environmental targets

☑ Achievement of environmental targets

(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

The bonus is based on the achievement of climate-related KPIs, which are assessed annually and measured in terms of progress towards the organization's emissions reduction goals. The incentive is calculated as a percentage of the CEO's annual salary and linked to both short-term (annual) and long-term environmental performance indicators, including the reduction of GHG emissions and adherence to sustainability standards within the reporting period.

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

The CEO's incentives are directly tied to the execution of Doğan Holding's climate transition plan. By achieving the defined KPIs, including emissions reduction and enhanced energy efficiency, the CEO's leadership ensures alignment with the group's broader environmental objectives, such as reduction of emissions by 2030. This incentivizes the CEO to actively lead the transition towards a low-carbon future.

Water

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☑ Chief Executive Officer (CEO)

(4.5.1.2) Incentives

Select all that apply

☑ Bonus - % of salary

(4.5.1.3) Performance metrics

Targets

☑ Progress towards environmental targets

☑ Achievement of environmental targets

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

☑ Long-Term Incentive Plan, or equivalent, only (e.g. contractual multi-year bonus)

(4.5.1.5) Further details of incentives

This incentive is tied to performance metrics related to water resource management, including the implementation of water efficiency measures and progress towards sustainable water consumption practices within Doğan Holding's operations. The bonus is calculated as a percentage of the CEO's annual salary and is dependent on the successful execution of water-related initiatives and the reduction of water risks in key business areas.

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

The CEO's incentive promotes sustainable water use and conservation across Doğan Holding's operations. This includes the adoption of water reuse and recycling technologies, ensuring compliance with water conservation standards, and reducing operational water footprints, contributing to the broader environmental strategy of safeguarding water resources.

Climate change

(4.5.1.1) Position entitled to monetary incentive

Facility/Unit/Site management

☑ Business unit manager

(4.5.1.2) Incentives

Select all that apply

☑ Bonus - % of salary

(4.5.1.3) Performance metrics

Targets

☑ Progress towards environmental targets

☑ Achievement of environmental targets

☑ Organization performance against an environmental sustainability index

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

☑ Short-Term Incentive Plan, or equivalent, only (e.g. contractual annual bonus)

(4.5.1.5) Further details of incentives

This incentive is based on the unit's performance against climate-related metrics such as reducing emissions, increasing energy efficiency, and achieving related sustainability certifications. The performance is measured annually, and the bonus percentage depends on the unit's adherence to both short-term environmental goals and progress toward long-term climate targets.

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

The Business Unit Manager's incentives encourage focused efforts on implementing climate strategies at the operational level. By aligning the manager's goals with Doğan Holding's climate transition plan, this role contributes to reducing carbon emissions, improving energy performance, and fostering innovation in sustainable practices, which in turn supports Doğan Holding's transition to a low-carbon economy.
[Add row]

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

	Does your organization have any environmental policies?
	Select from: ☑ 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

The environmental policy of Doğan Holding applies across the organization and its entire value chain, including direct operations and its upstream and downstream partners. The policy includes commitments to protect biodiversity, mitigate climate change, and ensure efficient water use and reuse across its operations and business units. Moreover, Doğan Holding encourages sustainable practices within its supply chain to minimize environmental impacts.

(4.6.1.5) Environmental policy content

Environmental commitments

☑ Commitment to comply with regulations and mandatory standards

☑ Commitment to take environmental action beyond regulatory compliance

☑ Commitment to stakeholder engagement and capacity building on environmental issues

Water-specific commitments

☑ Commitment to reduce water consumption volumes

Social commitments

☑ Commitment to promote gender equality and women’s empowerment

☑ Commitment to respect internationally recognized human rights

(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 another global environmental treaty or policy goal, please specify **:**Yes, In line with Sustainable Development Goals

(4.6.1.7) Public availability

Select from:

☑ Publicly available

(4.6.1.8) Attach the policy

dogan-holding-sustainability-policy (1).pdf
[Add row]

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

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

Select from:

☑ Yes

(4.10.2) Collaborative framework or initiative

Select all that apply

☑ UN Global Compact

☑ Other, please specify **:**Turkish Industry and Business Association / Relevant Working Groups (Capital Markets Working Group, Environment and Climate Change Working Group)

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

We're active members and contributors on the following groups, frameworks, initiatives and regularly share our comment related to environmental issues. UN Global Compact: Doğan Holding is a signatory of the UN Global Compact, committing to its Ten Principles on human rights, labor, environment, and anti-corruption. As part of our engagement, we actively contribute to the environmental dimension of the Global Compact, focusing on Sustainable Development Goal (SDG) 13: Climate Action. We regularly submit our Communication on Progress (CoP), which outlines our actions and advancements in addressing climate-related challenges. Furthermore, we participate in various working groups and high-level dialogues to share best practices, offer insights on integrating sustainable policies into business strategies, and engage in collaborative efforts to accelerate the achievement of global environmental goals. Turkish Industry and Business Association (TÜSİAD) /

Capital Markets Working Group, Environment and Climate Change Working Group: Doğan Holding plays a prominent role within TÜSİAD's Environment and Climate Change Working Group, contributing to national-level policy discussions aimed at shaping Turkey's environmental legislation. We engage in sectoral working groups that analyze the impact of regulatory frameworks on business operations and identify opportunities for enhancing Turkey's alignment with international environmental standards. Through these forums, we have provided industry-specific insights on the transition towards a low-carbon economy, helping to draft recommendations and action plans that support sustainable business practices. Our participation also includes collaboration on white papers and research that influence public and private sector decision-making in sustainability. World Business Council for Sustainable Development (WBCSD) Turkey: As an active member of WBCSD Turkey, Doğan Holding engages with like-minded businesses to accelerate the transition to a sustainable economy. We contribute to several initiatives that focus on reducing environmental footprints, fostering sustainable innovation, and promoting resource efficiency. Our participation includes co-developing case studies and sector-specific sustainability benchmarks that assist other companies in setting more ambitious environmental targets. Additionally, we share our sustainability journey in various WBCSD working groups, offering transparency into our efforts to decarbonize operations, reduce water usage, and promote biodiversity across our value chain.
[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

(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:

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

(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

To ensure that Doğan Holding's external engagement activities are aligned with our environmental commitments and/or transition plan, we have implemented the following process: Our participation in various national and international working groups, such as those led by TÜSİAD (e.g., Capital Markets Working Group, Environment and Climate Change Working Group), provides us with the opportunity to engage actively in shaping policies that align with our sustainability strategy. These engagements allow us to directly influence discussions related to environmental legislation and frameworks that affect our business and sector. We regularly assess the outputs from these working groups and cross-reference them with our internal environmental policies and objectives, including our sustainability goals related to climate change, water, and biodiversity. This ensures that our external advocacy efforts are not only consistent with but actively support our overarching environmental targets and commitments. Furthermore, we maintain a formal review process where key representatives from our sustainability team and senior management review the outcomes of our policy engagements. This process helps to ensure that any potential conflicts between external engagements and our internal environmental objectives are identified and addressed promptly. By participating in initiatives such as UN Global Compact and WBCSD Türkiye, we align our policy advocacy with global environmental treaties and policy goals, ensuring that our engagement activities support broader international frameworks like the Paris Agreement and the Sustainable Development Goals (SDGs). This alignment guarantees that we advocate for policies that foster a sustainable transition across sectors and industries.
[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

TSRS (Türkiye Sustainability Reporting Standards)

(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

Transparency and due diligence

☑ Transparency requirements

☑ Verification and audits

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

Select from:

☑ National

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

Select all that apply

☑ Turkey

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

Select from:

☑ Support with no exceptions

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

Select all that apply

☑ Regular meetings

☑ Participation in working groups organized by policy makers

☑ 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

Relevance of TSRS (Türkiye Sustainability Reporting Standards): The TSRS (Türkiye Sustainability Reporting Standards) is highly relevant to our environmental commitments, particularly our focus on climate change and water management. By aligning with TSRS, our organization ensures adherence to transparency and audit requirements that enhance the accountability of environmental disclosures across our operations. This contributes directly to achieving our environmental goals by ensuring a systematic and verified approach to managing and reporting on environmental impacts. Our engagement has been informed by the need to comply with mandatory transparency standards, enabling us to ensure that our sustainability reporting is robust, accurate, and reflects our actual performance across our operations and value chain. This law also supports our transition plan by encouraging enhanced governance structures and internal processes, leading to more informed decision-making related to environmental management. Measuring Success: We measure the success of our engagement with TSRS by tracking the successful completion and verification of environmental audits, improvements in our sustainability reporting scores, and compliance with national regulations. Progress is also evaluated based on feedback from regular meetings with policy makers and participation in working groups, where we track our ability to meet regulatory requirements and contribute positively to shaping future standards. Additionally, we monitor the accuracy and timeliness of our environmental data submissions, ensuring continuous improvement in both reporting quality and environmental outcomes.

(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:

☑ No, we have not evaluated

[Add row]

(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

☑ GRI

(4.12.1.3) Environmental issues covered in publication

Select all that apply

☑ Climate change

☑ Water

☑ Biodiversity

(4.12.1.4) Status of the publication

Select from:

☑ Underway - previous year attached

(4.12.1.5) Content elements

Select all that apply

☑ Strategy

☑ Governance

☑ Emission targets

☑ Emissions figures

☑ Risks & Opportunities

☑ Value chain engagement

☑ Dependencies & Impacts

☑ Public policy engagement

☑ Water accounting figures

☑ Content of environmental policies

(4.12.1.6) Page/section reference

All sections deemed critical that are aligned with the content elements we've chosen left.

(4.12.1.7) Attach the relevant publication

dohol-sustainability-report-2022-2 (1).pdf

(4.12.1.8) Comment

This report offers a detailed and holistic overview of our organization's environmental strategy, highlighting significant progress in key areas such as climate change mitigation, water resource management, and biodiversity conservation. It reflects our commitment to sustainability by outlining the proactive measures we have implemented to reduce our environmental footprint across the value chain. Aligned with the Global Reporting Initiative (GRI) framework, the report ensures comprehensive and transparent disclosure of our environmental impacts, dependencies, and risks. Additionally, it emphasizes our engagement with stakeholders and the integration of environmental considerations into our governance structures, risk management, and strategic planning. By maintaining alignment with internationally

recognized reporting standards, the report reaffirms our dedication to continuous improvement in addressing critical environmental challenges and enhancing our resilience in the face of climate-related risks.
[Add row]

C5. Business strategy

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

Climate change

(5.1.1) Use of scenario analysis

Select from:

☑ Yes

(5.1.2) Frequency of analysis

Select from:

☑ Annually

Water

(5.1.1) Use of scenario analysis

Select from:

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

(5.1.3) Primary reason why your organization has not used scenario analysis

Select from:

☑ Not an immediate strategic priority

(5.1.4) Explain why your organization has not used scenario analysis

While water-related risks are recognized as important, they have not been considered an immediate strategic priority for scenario analysis at this stage. Our current focus has been on addressing the more pressing impacts of climate change, which have a broader and more immediate effect on our business. However, we acknowledge the critical nature of water as a resource and its potential future impact on our operations. As part of our forward-looking strategy, we are actively

developing plans to integrate water-related scenario analysis in our broader environmental assessment frameworks. This will enable us to better anticipate and mitigate potential risks associated with water scarcity, water quality, and regulatory changes in the coming years.
[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

☑ Customized publicly available climate transition scenario, please specify **:**IPCC Special Report on 1.5 Degrees

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Policy

☑ Market

☑ Liability

☑ Reputation

☑ Technology

☑ Acute physical

☑ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 1.5°C or lower

(5.1.1.7) Reference year

2010

(5.1.1.8) Timeframes covered

Select all that apply

☑ 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

☑ Global regulation

☑ Level of action (from local to global)

☑ Global targets

Macro and microeconomy

☑ Domestic growth

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Assumptions: The primary assumption is that Doğan Holding's group companies will align their climate-related targets with SBTi in the near future. This will provide the group with a strategic framework and background scenario informed by the IPCC Special Report on 1.5C, which will be used for developing the group's

decarbonization and climate-related scenarios. Uncertainties: The key uncertainties involve the timeline and speed at which the group companies will finalize their alignment with SBTi, and the potential variability in how external factors like regulatory changes, market shifts, and technological innovations impact the group's scenario planning. Constraints: The primary constraint is the current absence of formal scenario analysis at the group level. However, once the alignment with SBTi is completed, these constraints are expected to lessen, allowing for more comprehensive and detailed scenario analysis and integration into the group's climate strategy. The scenario aligns with the IPCC Special Report on Global Warming of 1.5C, providing critical pathways to limit temperature rise and mitigate climate risks. While we aim to adopt near-term targets aligned with the Science Based Targets initiative (SBTi) for our group companies, uncertainties include the future regulatory landscape, market dynamics, and the technological evolution required to meet decarbonization goals. Constraints also arise from the complexity of integrating diverse sectoral strategies within Doğan Holding's wide range of business activities, making it challenging to fully assess group-level outcomes immediately. Furthermore, the interdependency between different environmental risks—such as energy transition costs and water management—requires careful scenario modeling.

(5.1.1.11) Rationale for choice of scenario

The rationale for choosing the IPCC Special Report on 1.5C as the background scenario for group-wide climate strategy is to align with the SBTi's framework, which is widely recognized and adopted by international organizations. This scenario provides a credible and scientifically grounded pathway to limit global warming, aligning Doğan Holding's future climate targets with global best practices. Additionally, the alignment ensures that Doğan Holding's decarbonization pathway is robust, externally validated, and aligned with long-term climate goals. This strategic alignment will further solidify Doğan Holding's commitment to sustainability across its group companies and operations. The chosen scenario reflects the globally accepted 1.5C target outlined by the IPCC and adopted by the SBTi framework. This scenario provides a robust basis for our group companies to transition toward low-carbon strategies while identifying long-term climate risks and opportunities. By adhering to the IPCC's scientific findings, we ensure that our climate-related strategies are not only aligned with the most credible climate models but also with evolving global policies. This choice allows Doğan Holding to remain competitive and mitigate financial risks associated with climate change, particularly as we integrate this scenario into our broader sustainability strategy.
[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

The scenario analysis outcomes indicate that climate change poses both risks and opportunities for our business operations and long-term sustainability efforts. The analysis, primarily focused on the implications of a 1.5C global warming scenario, has informed our strategy, highlighting the need for resilience-building measures within our business model. We have identified key areas where we need to adjust our risk management processes and adopt proactive measures to mitigate the physical and transition risks associated with climate change. The analysis has also driven our understanding of the potential opportunities, particularly in areas of energy efficiency and renewable energy adoption. For example, the transition towards renewable energy sources in our operations and across our value chain is now seen as an area for significant investment, aligning with national and international climate goals. Furthermore, as our scenario analysis matures, we expect to incorporate more detailed quantitative assessments. This will include modeling the financial implications of physical risks like extreme weather events, alongside transition risks such as regulatory changes and carbon pricing. These findings will guide the organization's strategic decisions, especially related to capital expenditures, R&D in clean technology, and further integration of climate-related targets with our financial planning.
[Fixed row]

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

(5.2.1) Transition plan

Select from:

☑ No, but we are developing a climate transition plan within the next two years

(5.2.15) Primary reason for not having a climate transition plan that aligns with a 1.5°C world

Select from:

☑ Lack of internal resources, capabilities, or expertise (e.g., due to organization size)

(5.2.16) Explain why your organization does not have a climate transition plan that aligns with a 1.5°C world

Our business strategy is directly linked with our sustainability vision & strategy "Doğan Impact Plan". One of the major objectives of Doğan Impact Plan is becoming carbon neutral in operations (Scope 12) of our group companies as of 2030. We monitor the implementation & performance of Doğan Impact Plan's targets including

the afformentioned climate target annually starting in the financial planning phase of our group companies. We review and guide our business strategy, major plans of action, risk management practices and business plans with this state in mind. In addition to this, major capital expenditures, acquisitions & divestitures are considered by our executives in compliance with our climate target directly linked to our business strategy. Although our strategy has been influenced by the possible impacts of climate-related risks and opportunities, it is not yet tested with science based climate facts (e.g., 1.5C degree pathways, scenario analysis etc.) We're accelarating our efforts to align Doğan Impact Plan's climate target with science based criteria and develop a solid transition plan in the upcoming reporting years.
[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

Doğan Group's products and services face both risks and opportunities as a result of climate change and water-related challenges. In the energy sector, for example, there is an urgent need to transition from traditional fossil fuel-based energy to cleaner, renewable sources such as solar and wind energy. This shift is driven not only by regulatory pressures to reduce carbon emissions but also by growing market demand for sustainable energy solutions. This presents Doğan with the opportunity to position itself as a leader in Türkiye's energy transition, capitalizing on investments in solar power and potentially expanding into new renewable technologies. In the automotive sector, Doğan Group is responding to rising consumer expectations for environmentally friendly products, including electric vehicles (EVs). The Group's strategic focus on developing or partnering with manufacturers of electric and hybrid vehicles represents both an opportunity to capture market share in the growing EV market and a risk if the transition to low-carbon transportation solutions is not adequately prioritized. Water management, particularly in production processes, is also increasingly becoming a significant factor in the lifecycle of the products, which could impact both the costs and feasibility of large-scale production over time. By proactively addressing these risks and seizing the opportunities through investments in sustainable technologies, Doğan Group is ensuring that its products remain relevant in an increasingly environmentally conscious market.

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

Doğan Group's upstream and downstream value chains are exposed to environmental risks, particularly those related to climate change and water scarcity. In sectors such as automotive and consumer goods, many suppliers are dependent on water-intensive processes. As global climate patterns change, regions where Doğan Group's suppliers operate may experience water shortages, which could lead to supply chain disruptions and increased costs. Moreover, the shift towards decarbonization in the energy sector, influenced by both regulatory and market demands, puts additional pressure on Doğan Group to ensure its supply chain is aligned with sustainable practices. The Group is actively working to mitigate these risks by engaging with suppliers who are committed to reducing their environmental impact. For example, Doğan Group is increasingly prioritizing partnerships with suppliers that demonstrate a commitment to reducing water use, improving energy efficiency, and minimizing carbon footprints. This includes re-evaluating procurement practices, such as sourcing from regions less vulnerable to climate impacts or encouraging suppliers to adopt more sustainable practices, which can ultimately help to reduce operational risks and improve the Group's overall sustainability performance. In addition, opportunities arise from building a more resilient and sustainable supply chain. By working with environmentally responsible suppliers, Doğan Group can enhance its reputation and create long-term value through a greener and more adaptable supply chain that aligns with its broader sustainability goals.

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

☑ Water

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

Investing in research and development (R&D) is central to Doğan Group's strategy for addressing climate change and water-related risks while capitalizing on the associated opportunities. In the automotive and energy sectors, the Group's R&D efforts are focused on developing technologies that reduce environmental impact, such as improving the efficiency of electric vehicles and advancing renewable energy solutions like solar energy. This is particularly important as consumer preferences shift towards greener products, and regulatory frameworks increasingly require companies to meet stringent emissions targets. By investing in innovative technologies and sustainable practices, Doğan Group is positioning itself to not only meet future environmental regulations but also to lead in markets that are increasingly driven by sustainability. For example, Doğan is exploring the potential of integrating smart energy management systems in its energy operations, allowing for more efficient use of resources, reducing costs, and mitigating climate-related risks. Furthermore, the development of water-efficient technologies and processes can help mitigate the risks associated with water scarcity, particularly in water-intensive sectors such as energy and manufacturing. These investments not only

safeguard Doğan's operations against environmental risks but also create opportunities for growth in emerging markets focused on sustainability. As a result, R&D investments are a key component of Doğan's broader environmental strategy, ensuring long-term resilience and competitiveness.

Operations

(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

Doğan Group's operations, particularly in the energy and media sectors, are directly impacted by climate change and water-related risks. With increasing regulatory pressure to reduce carbon emissions both in Türkiye and internationally, Doğan Group is integrating more energy-efficient technologies and processes across its operations. This includes adopting renewable energy sources like solar and wind power, retrofitting existing infrastructure to reduce energy consumption, and implementing water-saving technologies in operations that rely heavily on water, such as power generation and data centers. In addition, Doğan Group is investing in adaptation measures to make its operations more resilient to climate-related disruptions, such as extreme weather events, which could affect both the availability of resources and the stability of supply chains. For instance, the Group is assessing its operational footprint in vulnerable areas and developing contingency plans to ensure business continuity in the face of climate risks. On the opportunities side, Doğan's commitment to reducing its operational carbon footprint has opened the door to new markets and collaborations with other companies focused on sustainability. By integrating sustainability into the core of its operational strategy, Doğan Group is not only mitigating risks but also positioning itself to capture opportunities in the growing market for green energy and environmentally responsible business practices. The Group's focus on energy and water efficiency across its operations not only reduces operational costs but also contributes to its broader environmental and financial goals. Through continued investment in sustainable operations, Doğan Group is building resilience against future environmental challenges while aligning its business model with global sustainability trends.
[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

- ☑ Assets
- ☑ Revenues
- ☑ Liabilities
- ☑ Direct costs
- ☑ Indirect costs
- ☑ Access to capital
- ☑ Capital expenditures
- ☑ Acquisitions and divestments

(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

Environmental risks and opportunities, specifically related to climate change and water management, have significantly impacted Doğan Group's financial planning across multiple areas, including revenues, costs, capital expenditures, and access to capital: Revenues: The group's present and future alignment with climate-related regulations and frameworks, including Türkiye Sustainability Reporting Standards (TSRS) and international frameworks like SBTi, is driving new revenue streams. In industries like energy and media, the demand for sustainable services and green energy solutions has grown, boosting income. Direct Costs: Climate risks, such as extreme weather, have increased operational costs in the energy and logistics sectors. Investments in infrastructure resilience, like adapting energy facilities and logistics continuity, have been essential to manage rising costs. Indirect Costs: Stricter environmental regulations have raised indirect costs through requirements for greater transparency and compliance. Investments in monitoring and reporting systems, while initially costly, are expected to lead to efficient long-term resource management. Capital Expenditures: Doğan Impact Plan and its climate target decarbonization strategy may shift capital expenditure toward solar and wind projects. These investments may yield long-term benefits and align the group with green financial products and government incentives. Access to Capital: The group's focus on sustainability will enhance its appeal to ESG investors, improving terms for financing. By aligning with global standards like the Paris Agreement and

SDGs, Doğan is accessing green financing and attracting investors prioritizing decarbonization. Assets: By renewing and optimizing its assets, Doğan aligns with global environmental goals, benefiting long-term growth. Liabilities: Regulatory demands on emissions and water use are increasing liabilities in high-emission sectors. To mitigate this, Doğan is investing in cleaner technologies, reducing the risk of regulatory penalties and long-term liabilities while enhancing compliance. [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
	Select from: ☑ No, but we plan to in the next two years

[Fixed row]

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

(5.10.1) Use of internal pricing of environmental externalities

Select from:

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

(5.10.3) Primary reason for not pricing environmental externalities

Select from:

☑ Lack of internal resources, capabilities, or expertise (e.g., due to organization size)

(5.10.4) Explain why your organization does not price environmental externalities

We do not utilize internal pricing for environmental externalities, such as carbon pricing. However, we recognize the importance of this tool in assessing environmental risks and opportunities. As part of our ongoing sustainability strategy, we are planning to implement an internal carbon pricing mechanism within the

next two years. This will help us better evaluate potential cost implications, drive efficiencies, and prepare for future regulatory or market changes related to carbon emissions.
[Fixed row]

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

Suppliers

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

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

(5.11.3) Primary reason for not engaging with this stakeholder on environmental issues

Select from:

☑ Not an immediate strategic priority

(5.11.4) Explain why you do not engage with this stakeholder on environmental issues

Engagement with suppliers on environmental issues has not been an immediate focus due to ongoing organizational changes and resource allocation towards other internal priorities. However, we recognize that suppliers play a key role in achieving our environmental goals, and within the next two years, we plan to integrate environmental criteria in supplier selection and procurement processes.

Customers

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

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

(5.11.3) Primary reason for not engaging with this stakeholder on environmental issues

Select from:

☑ Not an immediate strategic priority

(5.11.4) Explain why you do not engage with this stakeholder on environmental issues

We have not engaged with customers on environmental issues as we have been focusing on aligning internal operations with environmental targets. Moving forward, we plan to engage customers through campaigns and partnerships that encourage environmentally responsible behavior, particularly regarding water usage and climate change impacts.

Investors and shareholders

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

☑ Yes

(5.11.2) Environmental issues covered

Select all that apply

☑ Climate change

☑ Water

Other value chain stakeholders

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

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

(5.11.3) Primary reason for not engaging with this stakeholder on environmental issues

Select from:

☑ Not an immediate strategic priority

(5.11.4) Explain why you do not engage with this stakeholder on environmental issues

Currently, engagement with other value chain stakeholders has not been prioritized. However, as part of our broader environmental strategy, we intend to initiate partnerships and collaboration efforts within the next two years to foster sustainability and environmental stewardship throughout the entire value chain.

[Fixed 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:

☑ Investors and shareholders

(5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Share information on environmental initiatives, progress and achievements

(5.11.9.3) % of stakeholder type engaged

Select from:

☑ 100%

(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

Climate change is a key issue of concern for both regulatory bodies and the investment community. As a publicly listed company, Doğan Holding has a legal and ethical obligation to disclose climate-related risks and opportunities to its shareholders. By providing comprehensive and transparent information, we enable investors to make informed decisions, aligning our sustainability goals with broader market expectations. Additionally, proactive communication on climate change helps to strengthen investor relations, mitigate reputational risk, and ensure compliance with the latest regulatory requirements related to climate disclosures.

(5.11.9.6) Effect of engagement and measures of success

The transparency of our climate change disclosures strengthens investor confidence in our ability to manage environmental risks and capitalize on emerging opportunities. This engagement has led to increased shareholder trust, reflected in stable investor relations and consistent positive feedback. Measures of success include the level of investor support for our sustainability strategies, the integration of climate considerations into their investment decisions, and our compliance with the evolving global standards on climate reporting. Ultimately, success is also gauged by the alignment of our long-term business strategy with climate-related targets, such as achieving net-zero emissions by a specific year.

Water

(5.11.9.1) Type of stakeholder

Select from:

☑ Investors and shareholders

(5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Share information on environmental initiatives, progress and achievements

(5.11.9.3) % of stakeholder type engaged

Select from:

☑ 100%

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

Water is a critical resource, especially for sectors in which Doğan Holding operates, including manufacturing and energy. Effective water management is essential not only for regulatory compliance but also for ensuring the sustainability of our operations in water-stressed regions. By actively engaging with investors on water issues, we help them understand how we are addressing these risks, thus supporting more sustainable investment decisions. This engagement also reassures shareholders that Doğan Holding is proactively managing its water-related dependencies and that these efforts contribute to long-term value creation and risk mitigation.

(5.11.9.6) Effect of engagement and measures of success

The effectiveness of our water-related disclosures is measured by the confidence investors place in our water stewardship and its alignment with their own sustainability criteria. This has led to a stronger perception of Doğan Holding as a responsible and forward-thinking organization, positively impacting our investor base. Success is gauged through enhanced investor relations, compliance with water management regulations, and the degree to which our water conservation

initiatives are recognized as critical to the long-term viability of our business. Achieving measurable improvements in water efficiency and resilience against water scarcity risks are further indicators of success.
[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

Under the operational control approach, we report emissions from operations where it has the authority to introduce and implement environmental policies. This ensures accountability for direct emissions reduction efforts, making it easier to track performance against climate targets.

Water

(6.1.1) Consolidation approach used

Select from:

☑ Operational control

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

Operational control allows us to monitor water usage, its efficiency within our own operations, improving efforts to reduce water consumption in areas where we have direct oversight.

Plastics

(6.1.1) Consolidation approach used

Select from:

☑ Operational control

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

We have control in plastic production, usage and waste management strategies where we have operational control, allowing us to better track progress in reducing plastic packaging or increasing recycling rates.

Biodiversity

(6.1.1) Consolidation approach used

Select from:

☑ Other, please specify

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

As we're currently navigating and gathering know-how and expertise related to biodiversity and nature-related financial disclosures, we plan to integrate biodiversity related disclosures to our non-financial reporting practices in the upcoming years. Because of this reason, we haven't used any consolidation approach related to biodiversity for the reporting period.
[Fixed row]

C7. Environmental performance - Climate Change

(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?

	Has there been a structural change?	Name of organization(s) acquired, divested from, or merged with	Details of structural change(s), including completion dates
	Select all that apply ☑ Yes, a divestment	*Aytemiz Akaryakıt Dağıtım A.Ş.*	*Aytemiz Akaryakıt Dağıtım A.Ş. has been divested from our group at the beginning of the reporting year.*

[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?
	Select all that apply ☑ 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 we have not evaluated whether the changes should trigger a base year recalculation

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

Even though Aytemiz is not within the scope anymore, but this does not warrant a base year recalculation because Aytemiz was within our operations in the base year which contributed to our emissions.

(7.1.3.4) Past years' recalculation

Select from:

☑ No

[Fixed row]

(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

We purchase electricity from the main grid. Turkish Electricity Grid's RECs certification, - direct contracts (low-carbon, renewable, etc.) - residual mix totals attributes are not available and that's why our market-based Scope 2 emissions are same as our location-based Scope 2 emissions.

[Fixed row]

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

Scope 1

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

20394.65

(7.5.3) Methodological details

For scope 1 calculation, stationary combustion, mobile combustion data for all locations.

Scope 2 (location-based)

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

28343.38

(7.5.3) Methodological details

We purchase electricity from the main grid. Turkish Electricity Grid's RECs certification, - direct contracts (low-carbon, renewable, etc.) - residual mix totals attributes are not available and that's why our market-based Scope 2 emissions are same as our location-based Scope 2 emissions.

Scope 2 (market-based)

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

28343.38

(7.5.3) Methodological details

We purchase electricity from the main grid. Turkish Electricity Grid's RECs certification, - direct contracts (low-carbon, renewable, etc.) - residual mix totals attributes are not available and that's why our market-based Scope 2 emissions are same as our location-based Scope 2 emissions.

Scope 3 category 1: Purchased goods and services

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

-

Scope 3 category 2: Capital goods

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

-

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

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

-

Scope 3 category 4: Upstream transportation and distribution

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

-

Scope 3 category 5: Waste generated in operations

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

-

Scope 3 category 6: Business travel

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

-

Scope 3 category 7: Employee commuting

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

-

Scope 3 category 8: Upstream leased assets

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

-

Scope 3 category 9: Downstream transportation and distribution

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

-

Scope 3 category 10: Processing of sold products

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

-

Scope 3 category 11: Use of sold products

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

-

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

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

-

Scope 3 category 13: Downstream leased assets

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

-

Scope 3 category 14: Franchises

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

-

Scope 3 category 15: Investments

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

-

Scope 3: Other (upstream)

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

-

Scope 3: Other (downstream)

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

-
[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)

64175.26

(7.6.3) Methodological details

For scope 1 calculation, stationary combustion, mobile combustion data for all locations. According to IPCC sixth report, GWP and conversion factors were used, regarding to the consumption.

Past year 1

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

66729.6

(7.6.2) End date

12/30/2022

(7.6.3) Methodological details

For scope 1 calculation, stationary combustion, mobile combustion data for all locations. According to IPCC sixth report, GWP and conversion factors were used, regarding to the consumption
[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)

19872.87

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

19872.87

(7.7.4) Methodological details

We purchase electricity from the main grid. Turkish Electricity Grid's RECs certification, - direct contracts (low-carbon, renewable, etc.) - residual mix totals attributes are not available and that's why our market-based Scope 2 emissions are same as our location-based Scope 2 emissions.

Past year 1

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

18008.03

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

18008.03

(7.7.3) End date

12/30/2022

(7.7.4) Methodological details

We purchase electricity from the main grid. Turkish Electricity Grid's RECs certification, - direct contracts (low-carbon, renewable, etc.) - residual mix totals attributes are not available and that's why our market-based Scope 2 emissions are same as our location-based Scope 2 emissions.
[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:

☑ Not evaluated

(7.8.5) Please explain

Due to a lack of resources and data accessibility limitations, this category has not been evaluated. However, we remain committed to transparency and improving our environmental performance; therefore, we will enhance our data collection and monitoring systems.

Capital goods

(7.8.1) Evaluation status

Select from:

☑ Not evaluated

(7.8.5) Please explain

Due to a lack of resources and data accessibility limitations, this category has not been evaluated. However, we remain committed to transparency and improving our environmental performance; therefore, we will enhance our data collection and monitoring systems.

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

(7.8.1) Evaluation status

Select from:

☑ Not evaluated

(7.8.5) Please explain

Due to a lack of resources and data accessibility limitations, this category has not been evaluated. However, we remain committed to transparency and improving our environmental performance; therefore, we will enhance our data collection and monitoring systems.

Upstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

Due to a lack of resources and data accessibility limitations, this category has not been evaluated. However, we remain committed to transparency and improving our environmental performance; therefore, we will enhance our data collection and monitoring systems.

Waste generated in operations

(7.8.1) Evaluation status

Select from:

☑ Not evaluated

(7.8.5) Please explain

Due to a lack of resources and data accessibility limitations, this category has not been evaluated. However, we remain committed to transparency and improving our environmental performance; therefore, we will enhance our data collection and monitoring systems.

Business travel

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

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

135.57

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Fuel-based method

☑ 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

Business Travel is the consolidated calculation of our group companies' flight data (passenger.km) (domestic short-haul flights, medium-range flights (up to 3700kms), international flights).

Employee commuting

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

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

1303.41

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Fuel-based method

☑ 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

Employee Commuting is the consolidated calculation of our group companies' commute data (personnel shuttles, buses and taxi travels of employees).

Upstream leased assets

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

Due to a lack of resources and data accessibility limitations, this category has not been evaluated. However, we remain committed to transparency and improving our environmental performance; therefore, we will enhance our data collection and monitoring systems.

Downstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

Due to a lack of resources and data accessibility limitations, this category has not been evaluated. However, we remain committed to transparency and improving our environmental performance; therefore, we will enhance our data collection and monitoring systems.

Processing of sold products

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

Due to a lack of resources and data accessibility limitations, this category has not been evaluated. However, we remain committed to transparency and improving our environmental performance; therefore, we will enhance our data collection and monitoring systems.

Use of sold products

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

Due to a lack of resources and data accessibility limitations, this category has not been evaluated. However, we remain committed to transparency and improving our environmental performance; therefore, we will enhance our data collection and monitoring systems.

End of life treatment of sold products

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

Due to a lack of resources and data accessibility limitations, this category has not been evaluated. However, we remain committed to transparency and improving our environmental performance; therefore, we will enhance our data collection and monitoring systems.

Downstream leased assets

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

Due to a lack of resources and data accessibility limitations, this category has not been evaluated. However, we remain committed to transparency and improving our environmental performance; therefore, we will enhance our data collection and monitoring systems.

Franchises

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

Due to a lack of resources and data accessibility limitations, this category has not been evaluated. However, we remain committed to transparency and improving our environmental performance; therefore, we will enhance our data collection and monitoring systems.

Investments

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

Due to a lack of resources and data accessibility limitations, this category has not been evaluated. However, we remain committed to transparency and improving our environmental performance; therefore, we will enhance our data collection and monitoring systems.

Other (upstream)

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

Due to a lack of resources and data accessibility limitations, this category has not been evaluated. However, we remain committed to transparency and improving our environmental performance; therefore, we will enhance our data collection and monitoring systems.

Other (downstream)

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

Due to a lack of resources and data accessibility limitations, this category has not been evaluated. However, we remain committed to transparency and improving our environmental performance; therefore, we will enhance our data collection and monitoring systems.
[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

12/30/2022

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

0

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

0

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

0

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

0

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

0

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

127.37

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

1152.6

(7.8.1.9) Scope 3: Upstream leased assets (metric tons CO2e)

0

(7.8.1.10) Scope 3: Downstream transportation and distribution (metric tons CO2e)

0

(7.8.1.11) Scope 3: Processing of sold products (metric tons CO2e)

0

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

0

(7.8.1.13) Scope 3: End of life treatment of sold products (metric tons CO2e)

0

(7.8.1.14) Scope 3: Downstream leased assets (metric tons CO2e)

0

(7.8.1.15) Scope 3: Franchises (metric tons CO2e)

0

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

0

(7.8.1.17) Scope 3: Other (upstream) (metric tons CO2e)

0

(7.8.1.18) Scope 3: Other (downstream) (metric tons CO2e)

0

(7.8.1.19) Comment

There is 12.43% increase compared to the previous year. As part of our Scope 3 emissions reduction strategy, we plan to implement innovative approaches such as route optimizations and alternative fuel vehicle solutions. We aim to reduce carbon emissions from employee shuttle services and introduce lower-carbon, innovative transportation solutions for business travel in the upcoming term.
[Fixed row]

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

	Verification/assurance status
Scope 1	*Select from:* ☑ Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	*Select from:* ☑ Third-party verification or assurance process in place
Scope 3	*Select from:*

	Verification/assurance status
	☑ 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:

☑ Underway but not complete for reporting year – previous statement of process attached

(7.9.1.3) Type of verification or assurance

Select from:

☑ Limited assurance

(7.9.1.4) Attach the statement

surdurulebilirlik-raporu-2022 (1).pdf

(7.9.1.5) Page/section reference

160-163

(7.9.1.6) Relevant standard

Select from:

☑ ISAE3000

(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 location-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:

☑ Underway but not complete for reporting year – previous statement of process attached

(7.9.2.4) Type of verification or assurance

Select from:

☑ Limited assurance

(7.9.2.5) Attach the statement

surdurulebilirlik-raporu-2022 (1).pdf

(7.9.2.6) Page/ section reference

160-163

(7.9.2.7) Relevant standard

Select from:

☑ ISAE3000

(7.9.2.8) Proportion of reported emissions verified (%)

100
[Add row]

(7.9.3) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.

Row 1

(7.9.3.1) Scope 3 category

Select all that apply

☑ Scope 3: Business travel

☑ Scope 3: Employee commuting

(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:

☑ Underway but not complete for reporting year – previous statement of process attached

(7.9.3.4) Type of verification or assurance

Select from:

☑ Limited assurance

(7.9.3.5) Attach the statement

surdurulebilirlik-raporu-2022 (1).pdf

(7.9.3.6) Page/section reference

160-163

(7.9.3.7) Relevant standard

Select from:

☑ ISAE3000

(7.9.3.8) Proportion of reported emissions verified (%)

100
[Add row]

(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.

Other emissions reduction activities

(7.10.1.1) Change in emissions (metric tons CO2e)

1001.19

(7.10.1.2) Direction of change in emissions

Select from:

☑ Decreased

(7.10.1.3) Emissions value (percentage)

1.2

(7.10.1.4) Please explain calculation

Emission reduction activities that occured in the reporting year, resulted as 1.2% emission reduction for scope 1 and scope 2.
[Fixed row]

(7.16) Break down your total gross global Scope 1 and 2 emissions by country/area.

	Scope 1 emissions (metric tons CO2e)	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Turkey	*64175.26*	*19872.87*	*19872.87*

[Fixed row]

(7.17.1) Break down your total gross global Scope 1 emissions by business division.

Row 1

(7.17.1.1) Business division

Holding

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

38562.89

Row 2

(7.17.1.1) Business division

Industry

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

24265.03

Row 3

(7.17.1.1) Business division

Electricity Generation

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

235.42

Row 4

(7.17.1.1) Business division

Automotive Trade and Marketing

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

1.85

Row 5

(7.17.1.1) Business division

Finance and Investment

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

277.91

Row 6

(7.17.1.1) Business division

Real Estate Investment

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

153.26

Row 7

(7.17.1.1) Business division

Internet, Entertainment and Media

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

678.9
[Add row]

(7.17.3) Break down your total gross global Scope 1 emissions by business activity.

	Activity
Row 2	*Generators*
Row 3	*Refrigerants*
Row 4	*Gas transformers*
Row 5	*Heating/Process*
Row 6	*Fleet*
Row 7	*Fire extinguishers*

[Add row]

(7.20.1) Break down your total gross global Scope 2 emissions by business division.

Row 1

(7.20.1.1) Business division

Holding

(7.20.1.2) Scope 2, location-based (metric tons CO2e)

467.58

(7.20.1.3) Scope 2, market-based (metric tons CO2e)

467.58

Row 2

(7.20.1.1) Business division

Industrial Goods

(7.20.1.2) Scope 2, location-based (metric tons CO2e)

16170.02

(7.20.1.3) Scope 2, market-based (metric tons CO2e)

16170.02

Row 3

(7.20.1.1) Business division

Electricity Generation

(7.20.1.2) Scope 2, location-based (metric tons CO2e)

1010.19

(7.20.1.3) Scope 2, market-based (metric tons CO2e)

1013

Row 4

(7.20.1.1) Business division

Automotive Trade and Marketing

(7.20.1.2) Scope 2, location-based (metric tons CO2e)

574.76

(7.20.1.3) Scope 2, market-based (metric tons CO2e)

574.76

Row 5

(7.20.1.1) Business division

Finance and Investment

(7.20.1.2) Scope 2, location-based (metric tons CO2e)

274.8

(7.20.1.3) Scope 2, market-based (metric tons CO2e)

274.8

Row 6

(7.20.1.1) Business division

Real Estate Investment

(7.20.1.2) Scope 2, location-based (metric tons CO2e)

1210.78

(7.20.1.3) Scope 2, market-based (metric tons CO2e)

1210.78

Row 7

(7.20.1.1) Business division

Internet, Entertainment and Media

(7.20.1.2) Scope 2, location-based (metric tons CO2e)

164.74

(7.20.1.3) Scope 2, market-based (metric tons CO2e)

164.74
[Add row]

(7.20.3) Break down your total gross global Scope 2 emissions by business activity.

	Activity
Row 1	*Electric - cooling*
Row 2	*Electric - other*

[Add 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)

64175.26

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

19872.87

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

19872.87

(7.22.4) Please explain

All other entities

(7.22.1) Scope 1 emissions (metric tons CO2e)

0

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

3.87

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

19872.87

(7.22.4) Please explain

[Fixed row]

(7.23.1) Break down your gross Scope 1 and Scope 2 emissions by subsidiary.

Row 1

(7.23.1.1) Subsidiary name

Doğan Yatırım Bankası A.Ş.

(7.23.1.2) Primary activity

Select from:

☑ Banks

(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)

106.69

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

22.71

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

22.71

(7.23.1.15) Comment

n/a

Row 2

(7.23.1.1) Subsidiary name

Ditaş Doğan Yedek Parça İmalat ve Teknik A.Ş.

(7.23.1.2) Primary activity

Select from:

☑ Other vehicle equipment & systems

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ ISIN code - equity

(7.23.1.5) ISIN code – equity

TRADITAS91H8

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

635.93

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

5335.31

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

5335.31

(7.23.1.15) Comment

n/a

Row 4

(7.23.1.1) Subsidiary name

Doğan Dış Ticaret ve Mümessillik A.Ş.

(7.23.1.2) Primary activity

Select from:

☑ Other professional services

(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)

0.05

(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

n/a

Row 5

(7.23.1.1) Subsidiary name

Doğan Burda Dergi Yayıncılık ve Pazarlama A.Ş.

(7.23.1.2) Primary activity

Select from:

☑ Print publishing

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ ISIN code - equity

(7.23.1.5) ISIN code – equity

TRADOBUR91D3

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

55.76

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

28.25

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

28.25

(7.23.1.15) Comment

n/a

Row 6

(7.23.1.1) Subsidiary name

Doğan Trend Otomotiv

(7.23.1.2) Primary activity

Select from:

☑ Automobiles

(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)

1.85

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

574.76

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

574.76

(7.23.1.15) Comment

n/a

Row 7

(7.23.1.1) Subsidiary name

Galata Wind Enerji A.Ş.

(7.23.1.2) Primary activity

Select from:

☑ Energy services & equipment

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ ISIN code - equity

(7.23.1.5) ISIN code – equity

TREGWIN00014

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

235.42

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

1010.19

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

1010.19

(7.23.1.15) Comment

n/a

Row 8

(7.23.1.1) Subsidiary name

Doğan Gayrimenkul Yatırımları ve Ticaret A.Ş.

(7.23.1.2) Primary activity

Select from:

☑ Real estate services

(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)

41.83

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

22.69

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

22.69

(7.23.1.15) Comment

n/a

Row 10

(7.23.1.1) Subsidiary name

Doğan Yayınları Yayıncılık ve Yapımcılık Ticaret A.Ş.

(7.23.1.2) Primary activity

Select from:

☑ Print publishing

(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)

158.91

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

119.02

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

119.02

(7.23.1.15) Comment

n/a

Row 11

(7.23.1.1) Subsidiary name

Sesa Ambalaj ve Plastik Sanayi Ticaret A.Ş.

(7.23.1.2) Primary activity

Select from:

☑ Plastic products

(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)

226.17

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

7285.58

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

7285.58

(7.23.1.15) Comment

n/a

Row 12

(7.23.1.1) Subsidiary name

Karel

(7.23.1.2) Primary activity

Select from:

☑ Communications equipment

(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)

23147.26

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

2940.81

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

2940.81

(7.23.1.15) Comment

n/a

Row 13

(7.23.1.1) Subsidiary name

Doruk Faktoring

(7.23.1.2) Primary activity

Select from:

☑ Other financial

(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)

104.79

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

82.5

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

82.5

(7.23.1.15) Comment

n/a

Row 14

(7.23.1.1) Subsidiary name

Kelkit Doğan Besi

(7.23.1.2) Primary activity

Select from:

☑ Cattle farming

(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)

22.26

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

95.61

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

95.61

(7.23.1.15) Comment

n/a

Row 15

(7.23.1.1) Subsidiary name

Hepsi Emlak

(7.23.1.2) Primary activity

Select from:

☑ Web-based services

(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)

464.22

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

17.47

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

17.47

(7.23.1.15) Comment

n/a

Row 16

(7.23.1.1) Subsidiary name

Kanal D Romanya

(7.23.1.2) Primary activity

Select from:

☑ Media

(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

n/a

Row 17

(7.23.1.1) Subsidiary name

Hepiyi Sigorta

(7.23.1.2) Primary activity

Select from:

☑ Insurance

(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)

66.43

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

169.6

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

169.6

(7.23.1.15) Comment

n/a

Row 18

(7.23.1.1) Subsidiary name

Daiichi

(7.23.1.2) Primary activity

Select from:

☑ Electrical equipment

(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)

136.76

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

39.67

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

39.67

(7.23.1.15) Comment

n/a

Row 19

(7.23.1.1) Subsidiary name

Profil Sanayi ve Ticaret A.Ş.

(7.23.1.2) Primary activity

Select from:

☑ Metals supply, wholesale & trading

(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)

71.46

(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

n/a

Row 20

(7.23.1.1) Subsidiary name

Maksipak

(7.23.1.2) Primary activity

Select from:

☑ Plastic products

(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)

25.14

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

473.03

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

473.03

(7.23.1.15) Comment

n/a

Row 21

(7.23.1.1) Subsidiary name

Milta Bodrum Marina

(7.23.1.2) Primary activity

Select from:

☑ Other professional services

(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)

111.43

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

1188.08

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

1188.08

(7.23.1.15) Comment

n/a

Row 22

(7.23.1.1) Subsidiary name

Doğan Holding

(7.23.1.2) Primary activity

Select from:

☑ Other professional services

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ ISIN code – bond

☑ ISIN code - equity

☑ Ticker symbol

☑ LEI number

(7.23.1.4) ISIN code – bond

TRFDHOL92315

(7.23.1.5) ISIN code – equity

TRADOHOL91Q8

(7.23.1.7) Ticker symbol

DOHOL

(7.23.1.9) LEI number

789000J24Q4JM3H6UX22

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

38562.89

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

467.58

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

467.58

(7.23.1.15) Comment

n/a
[Add row]

(7.30) Select which energy-related activities your organization has undertaken.

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	*Select from:* ☑ Yes
Consumption of purchased or acquired electricity	*Select from:* ☑ Yes
Consumption of purchased or acquired heat	*Select from:* ☑ No
Consumption of purchased or acquired steam	*Select from:* ☑ No
Consumption of purchased or acquired cooling	*Select from:* ☑ No
Generation of electricity, heat, steam, or cooling	*Select from:* ☑ No

[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

285128

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

285128

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

45268

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

45268

Total energy consumption

(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

330397

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

330397
[Fixed row]

(7.30.6) Select the applications of your organization’s consumption of fuel.

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	*Select from:*

	Indicate whether your organization undertakes this fuel application
	☑ No
Consumption of fuel for the generation of heat	*Select from:* ☑ Yes
Consumption of fuel for the generation of steam	*Select from:* ☑ No
Consumption of fuel for the generation of cooling	*Select from:* ☑ No
Consumption of fuel for co-generation or tri-generation	*Select from:* ☑ No

[Fixed row]

(7.30.7) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.

Sustainable biomass

(7.30.7.1) Heating value

Select from:

☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.8) Comment

Other biomass

(7.30.7.1) Heating value

Select from:

☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.8) Comment

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

(7.30.7.8) Comment

Coal

(7.30.7.1) Heating value

Select from:

☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.8) Comment

Oil

(7.30.7.1) Heating value

Select from:

☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

265563

(7.30.7.8) Comment

This figure consists of diesel and oil consumptions.

Gas

(7.30.7.1) Heating value

Select from:

☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

19566

(7.30.7.8) Comment

This figure consists of LPG and natural gas consumptions.

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

(7.30.7.8) Comment

Total fuel

(7.30.7.1) Heating value

Select from:
☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

285128

(7.30.7.8) Comment

This figure is the sum of natural gas LPG, diesel and oil consumptions.
[Fixed row]

(7.30.14) Provide details on the electricity, heat, steam, and/or cooling amounts that were accounted for at a zero or near-zero emission factor in the market-based Scope 2 figure reported in 7.7.

Row 1

(7.30.14.1) Country/area

Select from:

☑ Turkey

(7.30.14.2) Sourcing method

Select from:

☑ Other, please specify **:**On-site self consumption of electricity generated from renewable sources (wind & solar) for our group company "Galata Wind"

(7.30.14.3) Energy carrier

Select from:

☑ Electricity

(7.30.14.4) Low-carbon technology type

Select from:

☑ Wind

(7.30.14.5) Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)

345

(7.30.14.6) Tracking instrument used

Select from:

☑ Other, please specify **:**Own generation amounts of wind & solar plant

(7.30.14.7) Country/area of origin (generation) of the low-carbon energy or energy attribute

Select from:

☑ Turkey

(7.30.14.8) Are you able to report the commissioning or re-powering year of the energy generation facility?

Select from:

☑ Yes

(7.30.14.9) Commissioning year of the energy generation facility (e.g. date of first commercial operation or repowering)

2010

(7.30.14.10) Comment

[Add row]

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

Turkey

(7.30.16.1) Consumption of purchased electricity (MWh)

45268.5

(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)

45268.50
[Fixed 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

0.000001863

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

84048.13

(7.45.3) Metric denominator

Select from:
☑ unit total revenue

(7.45.4) Metric denominator: Unit total

45116718227.16

(7.45.5) Scope 2 figure used

Select from:
☑ Location-based

(7.45.6) % change from previous year

14.41

(7.45.7) Direction of change

Select from:

☑ Decreased

(7.45.8) Reasons for change

Select all that apply

☑ Change in output

☑ Change in revenue

(7.45.9) Please explain

In the reporting year, the revenue has significantly increased while the Scope 1 and 2 emissions slightly decreased
[Add row]

(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 2

(7.53.1.2) Is this a science-based target?

Select from:

☑ No, but we anticipate setting one in the next two years

(7.53.1.5) Date target was set

12/31/2022

(7.53.1.6) Target coverage

Select from:

☑ Organization-wide

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

☑ Methane (CH4)

☑ Nitrous oxide (N2O)

☑ Carbon dioxide (CO2)

☑ Perfluorocarbons (PFCs)

☑ Hydrofluorocarbons (HFCs)

☑ Sulphur hexafluoride (SF6)

☑ Nitrogen trifluoride (NF3)

(7.53.1.8) Scopes

Select all that apply

☑ Scope 3

(7.53.1.10) Scope 3 categories

Select all that apply

☑ Scope 3, Category 6 – Business travel

☑ Scope 3, Category 7 – Employee commuting

(7.53.1.11) End date of base year

12/30/2022

(7.53.1.19) Base year Scope 3, Category 6: Business travel emissions covered by target (metric tons CO2e)

127.37

(7.53.1.20) Base year Scope 3, Category 7: Employee commuting emissions covered by target (metric tons CO2e)

1152.6

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

1279.970

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

1279.970

(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

(7.53.1.52) Base year total Scope 3 emissions covered by target as % of total base year emissions in Scope 3 (in all Scope 3 categories)

100

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

100

(7.53.1.54) End date of target

12/31/2039

(7.53.1.55) Targeted reduction from base year (%)

40

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

767.982

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

135.58

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

1258.07

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

1393.650

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

1393.650

(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

-22.20

(7.53.1.80) Target status in reporting year

Select from:

☑ Underway

(7.53.1.82) Explain target coverage and identify any exclusions

This target covers all organization.

(7.53.1.83) Target objective

This target aims to reduce scope 3 emissions, by 40% until 2040.

(7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

In the reporting year, our company is approximately 22% behind the target for emission reductions. However, we have a comprehensive plan in place to close this gap and achieve the target within the designated timeframe. We are working on sustainable practices that specifically target Scope 3 emissions, such as improving transportation efficiency and minimazing travel related emissions.

(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 1

(7.53.1.2) Is this a science-based target?

Select from:

☑ No, but we anticipate setting one in the next two years

(7.53.1.5) Date target was set

12/31/2019

(7.53.1.6) Target coverage

Select from:

☑ Organization-wide

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

☑ Methane (CH4)

☑ Nitrous oxide (N2O)

☑ Carbon dioxide (CO2)

☑ Perfluorocarbons (PFCs)

☑ Hydrofluorocarbons (HFCs)

☑ Sulphur hexafluoride (SF6)

☑ Nitrogen trifluoride (NF3)

(7.53.1.8) Scopes

Select all that apply

☑ Scope 1

☑ Scope 2

(7.53.1.9) Scope 2 accounting method

Select from:

☑ Market-based

(7.53.1.11) End date of base year

12/30/2019

(7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO2e)

20394.65

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

28343.38

(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)

48738.030

(7.53.1.33) Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1

100.0

(7.53.1.34) Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2

100.0

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

100.0

(7.53.1.54) End date of target

12/31/2029

(7.53.1.55) Targeted reduction from base year (%)

100

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

0.000

(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)

64175.26

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

19872.87

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

84048.130

(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

-72.45

(7.53.1.80) Target status in reporting year

Select from:

☑ New

(7.53.1.82) Explain target coverage and identify any exclusions

This target covers all organization

(7.53.1.83) Target objective

This target aims to reduce scope 1 and 2 emissions to zero by 2030.

(7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

Despite the recent increase in our Scope 1 and Scope 2 emissions, we remain committed to reducing these emissions to zero by 2030. We recognize the importance of addressing our direct and indirect carbon footprint and have established a robust plan to achieve this goal. Our strategy includes investing in cleaner technologies and processes to minimize emissions from our operations. We will also enhance our energy efficiency measures and transition to renewable energy sources, ensuring that we reduce our reliance on fossil fuels. Furthermore, we will implement comprehensive monitoring and reporting mechanisms to track our progress and make necessary adjustments along the way. Through these concerted efforts, we are dedicated to achieving net-zero emissions for Scope 1 and Scope 2 by the target date.

(7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

☑ Yes

[Add row]

(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:

☑ Group of products or services

(7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:

☑ Other, please specify **:**Own taxonomy

(7.74.1.3) Type of product(s) or service(s)

Power

☑ Other, please specify **:**Solar PV & Wind Power Installations

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

One of the main contributors to our climate change performance is Galata Wind, which has a total installed capacity of 269 MW, consisting of wind and solar power plants. As a company that generates 100% renewable energy-based electricity, Galata Wind ensures a decrease of approximately 400,000 tonnes of GHG emissions (CO2e) per annum with its electricity production capacity of approximately 500,000 MWh.

(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:

☑ Other, please specify **:**GHG Protocol - Estimating and Reporting Avoided Emissions Guidance

(7.74.1.7) Life cycle stage(s) covered for the low-carbon product(s) or services(s)

Select from:

☑ Use stage

(7.74.1.8) Functional unit used

1 MWh of electricity generated.

(7.74.1.9) Reference product/service or baseline scenario used

Turkey Electricity Grid's 2021 emission factor (tonnes of CO2e per MWh of electricity generated) 0.447

(7.74.1.10) Life cycle stage(s) covered for the reference product/service or baseline scenario

Select from:

☑ Use stage

(7.74.1.11) Estimated avoided emissions (metric tons CO2e per functional unit) compared to reference product/service or baseline scenario

369.68

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

369,675 tonnes of CO2e is avoided due to annual zero carbon (PV & Wind use/generation stage) electricity generated compared to conventional electricity generation (average emission of 1 MWh electricity generated in Turkey (2021 TR Grid Emission Factor)).

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

3.5

[Add row]

C9. Environmental performance - Water security

(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:

☑ Continuously

(9.2.3) Method of measurement

The metering system installed at the point of water entry allows Doğan Holding to accurately monitor and record the volume of water withdrawn from the grid for its operational needs as well as water discharges when relevant. This method provides a reliable measurement mechanism to track and report water usage/discharge, ensuring transparency and accountability in the company's water management practices.

(9.2.4) Please explain

By obtaining water usage data directly from the third-party grid, Doğan Holding can access accurate and validated information regarding its water consumption. This data serves as a basis for analyzing water usage patterns, identifying opportunities for efficiency improvements, and setting water conservation targets within the organization. Doğan Holding employs a measurement method that relies on withdrawing water from the grid to obtain accurate and verifiable data on its water consumption. This approach ensures transparency, facilitates benchmarking, and enables the company to track its progress in sustainable water management practices.

Water withdrawals – volumes by source

(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

The metering system installed at the point of water entry allows Doğan Holding to accurately monitor and record the volume of water withdrawn from the grid for its operational needs as well as water discharges when relevant. This method provides a reliable measurement mechanism to track and report water usage/discharge, ensuring transparency and accountability in the company's water management practices.

(9.2.4) Please explain

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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

The metering system installed at the point of water entry allows Doğan Holding to accurately monitor and record the volume of water withdrawn from the grid for its operational needs as well as water discharges when relevant. This method provides a reliable measurement mechanism to track and report water usage/discharge, ensuring transparency and accountability in the company's water management practices.

(9.2.4) Please explain

By obtaining water usage data directly from the third-party grid, Doğan Holding can access accurate and validated information regarding its water consumption. This data serves as a basis for analyzing water usage patterns, identifying opportunities for efficiency improvements, and setting water conservation targets within the organization. Doğan Holding employs a measurement method that relies on withdrawing water from the grid to obtain accurate and verifiable data on its water consumption. This approach ensures transparency, facilitates benchmarking, and enables the company to track its progress in sustainable water management practices.

Water discharges – total volumes

(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

The metering system installed at the point of water entry allows Doğan Holding to accurately monitor and record the volume of water withdrawn from the grid for its operational needs as well as water discharges when relevant. This method provides a reliable measurement mechanism to track and report water usage/discharge, ensuring transparency and accountability in the company's water management practices.

(9.2.4) Please explain

By obtaining water usage data directly from the third-party grid, Doğan Holding can access accurate and validated information regarding its water consumption. This data serves as a basis for analyzing water usage patterns, identifying opportunities for efficiency improvements, and setting water conservation targets within the organization. Doğan Holding employs a measurement method that relies on withdrawing water from the grid to obtain accurate and verifiable data on its water consumption. This approach ensures transparency, facilitates benchmarking, and enables the company to track its progress in sustainable water management practices.

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

The metering system installed at the point of water entry allows Doğan Holding to accurately monitor and record the volume of water withdrawn from the grid for its operational needs as well as water discharges when relevant. This method provides a reliable measurement mechanism to track and report water usage/discharge, ensuring transparency and accountability in the company's water management practices.

(9.2.4) Please explain

By obtaining water usage data directly from the third-party grid, Doğan Holding can access accurate and validated information regarding its water consumption. This data serves as a basis for analyzing water usage patterns, identifying opportunities for efficiency improvements, and setting water conservation targets within the organization. Doğan Holding employs a measurement method that relies on withdrawing water from the grid to obtain accurate and verifiable data on its water consumption. This approach ensures transparency, facilitates benchmarking, and enables the company to track its progress in sustainable water management practices.

Water discharges – volumes by treatment method

(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

The metering system installed at the point of water entry allows Doğan Holding to accurately monitor and record the volume of water withdrawn from the grid for its operational needs as well as water discharges when relevant. This method provides a reliable measurement mechanism to track and report water usage/discharge, ensuring transparency and accountability in the company's water management practices.

(9.2.4) Please explain

By obtaining water usage data directly from the third-party grid, Doğan Holding can access accurate and validated information regarding its water consumption. This data serves as a basis for analyzing water usage patterns, identifying opportunities for efficiency improvements, and setting water conservation targets within the organization. Doğan Holding employs a measurement method that relies on withdrawing water from the grid to obtain accurate and verifiable data on its water consumption. This approach ensures transparency, facilitates benchmarking, and enables the company to track its progress in sustainable water management practices.

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:

☑ Continuously

(9.2.3) Method of measurement

The metering system installed at the point of water entry allows Doğan Holding to accurately monitor and record the volume of water withdrawn from the grid for its operational needs as well as water discharges when relevant. This method provides a reliable measurement mechanism to track and report water usage/discharge, ensuring transparency and accountability in the company's water management practices.

(9.2.4) Please explain

By obtaining water usage data directly from the third-party grid, Doğan Holding can access accurate and validated information regarding its water consumption. This data serves as a basis for analyzing water usage patterns, identifying opportunities for efficiency improvements, and setting water conservation targets within the organization. Doğan Holding employs a measurement method that relies on withdrawing water from the grid to obtain accurate and verifiable data on its water consumption. This approach ensures transparency, facilitates benchmarking, and enables the company to track its progress in sustainable water management practices.

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

Pesticides, and/or other priority substances are not relevant for our operations.

Water discharge quality – temperature

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Continuously

(9.2.3) Method of measurement

The metering system installed at the point of water entry allows Doğan Holding to accurately monitor and record the volume of water withdrawn from the grid for its operational needs as well as water discharges when relevant. This method provides a reliable measurement mechanism to track and report water usage/discharge, ensuring transparency and accountability in the company's water management practices.

(9.2.4) Please explain

By obtaining water usage data directly from the third-party grid, Doğan Holding can access accurate and validated information regarding its water consumption. This data serves as a basis for analyzing water usage patterns, identifying opportunities for efficiency improvements, and setting water conservation targets within the organization. Doğan Holding employs a measurement method that relies on withdrawing water from the grid to obtain accurate and verifiable data on its water consumption. This approach ensures transparency, facilitates benchmarking, and enables the company to track its progress in sustainable water management practices.

Water consumption – total volume

(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

The metering system installed at the point of water entry allows Doğan Holding to accurately monitor and record the volume of water withdrawn from the grid for its operational needs as well as water discharges when relevant. This method provides a reliable measurement mechanism to track and report water usage/discharge, ensuring transparency and accountability in the company's water management practices.

(9.2.4) Please explain

By obtaining water usage data directly from the third-party grid, Doğan Holding can access accurate and validated information regarding its water consumption. This data serves as a basis for analyzing water usage patterns, identifying opportunities for efficiency improvements, and setting water conservation targets within the organization. Doğan Holding employs a measurement method that relies on withdrawing water from the grid to obtain accurate and verifiable data on its water consumption. This approach ensures transparency, facilitates benchmarking, and enables the company to track its progress in sustainable water management practices.

Water recycled/reused

(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

The metering system installed at the point of water entry allows Doğan Holding to accurately monitor and record the volume of water withdrawn from the grid for its operational needs as well as water discharges when relevant. This method provides a reliable measurement mechanism to track and report water usage/discharge, ensuring transparency and accountability in the company's water management practices.

(9.2.4) Please explain

By obtaining water usage data directly from the third-party grid, Doğan Holding can access accurate and validated information regarding its water consumption. This data serves as a basis for analyzing water usage patterns, identifying opportunities for efficiency improvements, and setting water conservation targets within the organization. Doğan Holding employs a measurement method that relies on withdrawing water from the grid to obtain accurate and verifiable data on its water consumption. This approach ensures transparency, facilitates benchmarking, and enables the company to track its progress in sustainable water management practices.

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

The metering system installed at the point of water entry allows Doğan Holding to accurately monitor and record the volume of water withdrawn from the grid for its operational needs as well as water discharges when relevant. This method provides a reliable measurement mechanism to track and report water usage/discharge, ensuring transparency and accountability in the company's water management practices.

(9.2.4) Please explain

By obtaining water usage data directly from the third-party grid, Doğan Holding can access accurate and validated information regarding its water consumption. This data serves as a basis for analyzing water usage patterns, identifying opportunities for efficiency improvements, and setting water conservation targets within the organization. Doğan Holding employs a measurement method that relies on withdrawing water from the grid to obtain accurate and verifiable data on its water consumption. This approach ensures transparency, facilitates benchmarking, and enables the company to track its progress in sustainable water management practices.
[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)

195.36

(9.2.2.2) Comparison with previous reporting year

Select from:
☑ Lower

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:
☑ Divestment from water intensive technology/process

(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

n/a

Total discharges

(9.2.2.1) Volume (megaliters/year)

159.83

(9.2.2.2) Comparison with previous reporting year

Select from:

☑ Lower

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☑ Divestment from water intensive technology/process

(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

n/a

Total consumption

(9.2.2.1) Volume (megaliters/year)

35.53

(9.2.2.2) Comparison with previous reporting year

Select from:

☑ Lower

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☑ Divestment from water intensive technology/process

(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

n/a

[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:

☑ No

(9.2.4.8) Identification tool

Select all that apply

☑ WRI Aqueduct

☑ WWF Water Risk Filter

(9.2.4.9) Please explain

As Doğan Holding, we are mindful of the locations where our facilities are primarily situated, with a significant presence around İstanbul and İzmir. It is worth noting that these areas are not considered water-stressed regions. Consequently, we do not engage in water withdrawals from water-stressed areas for our operations. By operating in regions that are not classified as water-stressed, we can ensure that our activities do not exert additional pressure on areas facing water scarcity or stress. We recognize the importance of responsible water sourcing and strive to align our operations with sustainable water management practices. While we acknowledge that water scarcity is a global concern, our geographic presence in regions with sufficient water resources allows us to focus on other aspects of responsible water management, such as efficient water usage, conservation, and wastewater treatment. By proactively managing water resources in areas where we operate, we aim to minimize our environmental impact and contribute to the overall sustainability of these regions. It is important to note that our commitment to responsible water management extends beyond the absence of water withdrawals from water-stressed areas. We understand that water is a precious resource, and regardless of the local context, we strive to adopt sustainable practices, monitor our water usage, and continuously seek opportunities to improve our water efficiency and conservation efforts. As Doğan Holding, we remain dedicated to sustainable business practices and responsible water management, ensuring that our operations contribute positively to the preservation and responsible use of water resources. We continuously monitor the evolving water landscape and adapt our practices accordingly, taking into account local water conditions and collaborating with stakeholders to address emerging challenges.
[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:

☑ Not relevant

(9.2.7.5) Please explain

Brackish surface water/Seawater

(9.2.7.1) Relevance

Select from:

☑ Not relevant

(9.2.7.5) Please explain

Groundwater – renewable

(9.2.7.1) Relevance

Select from:

☑ Not relevant

(9.2.7.5) Please explain

Groundwater – non-renewable

(9.2.7.1) Relevance

Select from:

☑ Not relevant

(9.2.7.5) Please explain

Produced/Entrained water

(9.2.7.1) Relevance

Select from:

☑ Not relevant

(9.2.7.5) Please explain

Third party sources

(9.2.7.1) Relevance

Select from:

☑ Relevant

(9.2.7.2) Volume (megaliters/year)

195.36

(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:

☑ Divestment from water intensive technology/process

(9.2.7.5) Please explain

[Fixed row]

(9.2.8) Provide total water discharge data by destination.

Fresh surface water

(9.2.8.1) Relevance

Select from:

☑ Not relevant

(9.2.8.5) Please explain

Brackish surface water/seawater

(9.2.8.1) Relevance

Select from:

☑ Not relevant

(9.2.8.5) Please explain

Groundwater

(9.2.8.1) Relevance

Select from:

☑ Not relevant

(9.2.8.5) Please explain

Third-party destinations

(9.2.8.1) Relevance

Select from:

☑ Relevant

(9.2.8.2) Volume (megaliters/year)

159.83

(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:

☑ Divestment from water intensive technology/process

(9.2.8.5) Please explain

We directly discharge our wastewater to the municipality's wastewater channel.
[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

(9.2.9.6) Please explain

-

Secondary treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Not relevant

(9.2.9.6) Please explain

-

Primary treatment only

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Not relevant

(9.2.9.6) Please explain

-

Discharge to the natural environment without treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Not relevant

(9.2.9.6) Please explain

-

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)

35.53

(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:

☑ Divestment from water intensive technology/process

(9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

☑ 100%

(9.2.9.6) Please explain

-

Other

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Not relevant

(9.2.9.6) Please explain

-

[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?

	Identification of facilities in the value chain stage
Direct operations	*Select from:* ☑ No, we have assessed this value chain stage but did not identify any facilities with water-related dependencies, impacts, risks, and opportunities
Upstream value chain	*Select from:* ☑ No, we have not assessed this value chain stage for facilities with water-related dependencies, impacts, risks, and opportunities, and are not planning to do so in the next 2 years

[Fixed row]

(9.5) Provide a figure for your organization's total water withdrawal efficiency.

(9.5.1) Revenue (currency)

1803556238.4

(9.5.2) Total water withdrawal efficiency

9231962.73

(9.5.3) Anticipated forward trend

Considering our anticipated forward trend in business growth, we expect an upward trajectory in our business operations. This growth may potentially lead to increased water usage numbers as our business activities expand to meet market demands. Hence, we aim to adopt sustainable practices that minimize our water consumption per unit of output. Importantly, if our revenue keeps increasing at a faster pace than our water usage numbers, our water efficiency will improve.
[Fixed row]

(9.13) Do any of your products contain substances classified as hazardous by a regulatory authority?

	Products contain hazardous substances	Comment
	Select from: ☑ No	*We do not have any product that contains hazardous substance.*

[Fixed row]

(9.14) Do you classify any of your current products and/or services as low water impact?

(9.14.1) Products and/or services classified as low water impact

Select from:

☑ No, but we plan to address this within the next two years

(9.14.3) Primary reason for not classifying any of your current products and/or services as low water impact

Select from:

☑ Important but not an immediate business priority

(9.14.4) Please explain

Doğan Holding acknowledges that we are yet to classify any of our current products and/or services as having a low water impact. However, we are committed to continuously improving our understanding and management of water-related aspects throughout our operations.While we may not have explicitly classified our products and services as low water impact at this stage, we are actively working towards achieving this goal in the future. As part of our commitment to sustainable practices, we are dedicated to assessing the water footprint of our offerings, identifying areas where water usage can be minimized, and exploring innovative approaches to reduce water impact across our value chain.
[Fixed row]

(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

Doğan Holding recognizes the importance of addressing various water-related aspects beyond its water replenishment target. The company intends to implement additional targets concerning water pollution, water withdrawals, and Water, Sanitation, and Hygiene (WASH) services. However, Doğan Holding acknowledges the

need to establish strong water management processes within the company as a prerequisite for effectively addressing these areas. Before implementing specific targets in these areas, Doğan Holding will engage in thorough assessments and analyses to understand the current state of its water-related practices. This includes evaluating potential sources of water pollution, assessing water withdrawal patterns, and examining the provision of WASH services within its operations.

Water withdrawals

(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

Doğan Holding recognizes the importance of addressing various water-related aspects beyond its water replenishment target. The company intends to implement additional targets concerning water pollution, water withdrawals, and Water, Sanitation, and Hygiene (WASH) services. However, Doğan Holding acknowledges the need to establish strong water management processes within the company as a prerequisite for effectively addressing these areas. Before implementing specific targets in these areas, Doğan Holding will engage in thorough assessments and analyses to understand the current state of its water-related practices. This includes evaluating potential sources of water pollution, assessing water withdrawal patterns, and examining the provision of WASH services within its operations.

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

Doğan Holding recognizes the importance of addressing various water-related aspects beyond its water replenishment target. The company intends to implement additional targets concerning water pollution, water withdrawals, and Water, Sanitation, and Hygiene (WASH) services. However, Doğan Holding acknowledges the need to establish strong water management processes within the company as a prerequisite for effectively addressing these areas. Before implementing specific targets in these areas, Doğan Holding will engage in thorough assessments and analyses to understand the current state of its water-related practices. This includes evaluating potential sources of water pollution, assessing water withdrawal patterns, and examining the provision of WASH services within its operations.

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 use efficiency

☑ Other water use efficiency, please specify **:**% recycling water

(9.15.2.4) Date target was set

12/31/2021

(9.15.2.5) End date of base year

12/30/2022

(9.15.2.6) Base year figure

0

(9.15.2.7) End date of target year

12/30/2030

(9.15.2.8) Target year figure

100

(9.15.2.9) Reporting year figure

8.19

(9.15.2.10) Target status in reporting year

Select from:

☑ Underway

(9.15.2.11) % of target achieved relative to base year

8

(9.15.2.12) Global environmental treaties/initiatives/ frameworks aligned with or supported by this target

Select all that apply

☑ None, alignment not assessed

(9.15.2.13) Explain target coverage and identify any exclusions

We are monitoring water data regularly at the holding and group company levels, aiming to recover 100% of the water we use by 2030. Notable progress is being made in the real estate investments sector so far. Currently, the entire share of water recovery operation is attributed to Milta Bodrum Marina. As part of this, the boat wash water treatment system in the dock area is designed to optimize the efficient use of water resources, collecting water through floor grates, treating it, and allowing for its reuse.

(9.15.2.14) Plan for achieving target, and progress made to the end of the reporting year

In 2023, total of 195,362.69 m³ of waterhad withdrawn and 15,992.20 m³ was recycled. Even though the water recycling rate decreased from 10.28% in 2022 to 8.19% in 2023, indicating that the recovery process did not increase proportionally with growing water usage. However, the total volume of recovered water remains significant, particularly in the real estate investments sector, where we have achieved positive results in water recovery.

(9.15.2.16) Further details of target

-
[Add row]

C10. Environmental performance - Plastics

(10.1) Do you have plastics-related targets, and if so what type?

	Targets in place	Please explain
	Select from: ☑ No, but we plan to within the next two years	-

[Fixed row]

(10.2) Indicate whether your organization engages in the following activities.

Production/commercialization of plastic polymers (including plastic converters)

(10.2.1) Activity applies

Select from:

☑ No

(10.2.2) Comment

-

Production/commercialization of durable plastic goods and/or components (including mixed materials)

(10.2.1) Activity applies

Select from:

☑ Yes

(10.2.2) Comment

Our group company Sesa Packaging produces these kind of goods.

Usage of durable plastics goods and/or components (including mixed materials)

(10.2.1) Activity applies

Select from:

☑ No

(10.2.2) Comment

-

Production/commercialization of plastic packaging

(10.2.1) Activity applies

Select from:

☑ No

(10.2.2) Comment

-

Production/commercialization of goods/products packaged in plastics

(10.2.1) Activity applies

Select from:

☑ No

(10.2.2) Comment

-

Provision/commercialization of services that use plastic packaging (e.g., food services)

(10.2.1) Activity applies

Select from:

☑ No

(10.2.2) Comment

-

Provision of waste management and/or water management services

(10.2.1) Activity applies

Select from:

☑ No

(10.2.2) Comment

-

Provision of financial products and/or services for plastics-related activities

(10.2.1) Activity applies

Select from:

☑ No

(10.2.2) Comment

-

Other activities not specified

(10.2.1) Activity applies

Select from:

☑ No

(10.2.2) Comment

-

[Fixed row]

C11. Environmental performance - Biodiversity

(11.2) What actions has your organization taken in the reporting year to progress your biodiversity-related commitments?

	Actions taken in the reporting period to progress your biodiversity-related commitments
	Select from: ☑ No, we are not taking any actions to progress our biodiversity-related commitments, but we plan to within the next two years

[Fixed row]

(11.3) Does your organization use biodiversity indicators to monitor performance across its activities?

	Does your organization use indicators to monitor biodiversity performance?	Indicators used to monitor biodiversity performance
	Select from: ☑ Yes, we use indicators	*Select all that apply* ☑ State and benefit indicators ☑ Pressure indicators ☑ Response indicators

[Fixed row]

(11.4) Does your organization have activities located in or near to areas important for biodiversity in the reporting year?

	Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity	Comment
Legally protected areas	*Select from:* ☑ No	-
UNESCO World Heritage sites	*Select from:* ☑ No	-
UNESCO Man and the Biosphere Reserves	*Select from:* ☑ No	-
Ramsar sites	*Select from:* ☑ No	-
Key Biodiversity Areas	*Select from:* ☑ Not assessed	-
Other areas important for biodiversity	*Select from:* ☑ Not assessed	-

[Fixed 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?

(13.1.1) Other environmental information included in your CDP response is verified and/or assured by a third party

Select from:

☑ No, and we do not plan to obtain third-party verification/assurance of other environmental information in our CDP response within the next two years

(13.1.2) Primary reason why other environmental information included in your CDP response is not verified and/or assured by a third party

Select from:

☑ Judged to be unimportant or not relevant

(13.1.3) Explain why other environmental information included in your CDP response is not verified and/or assured by a third party

We have already reported environmental information regarding our operations in the reporting year. Considerably important data/ results have verified by third party and related documents had shared in the previous sections.
[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?

	Environmental issue for which data has been verified and/or assured
Row 1	*Select all that apply* ☑ Climate change ☑ Water

[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 Financial Officer - CFO, Member of Executive Committee

(13.3.2) Corresponding job category

Select from:

☑ Chief Financial Officer (CFO)

[Fixed row]