

## C0. Introduction

### C0.1

#### (C0.1) Give a general description and introduction to your organization.

Doğan Group operates across a vast geographical area, and forms strategic partnerships with international groups in order to ensure efficiency of operations. Thanks to our value-focused approach to investments, Doğan Group is a responsible investment holding that aims to extend its positive impact around the world. We strive for a better future by developing long-term solutions in our regions of operation, and transform our investments with this vision in mind. Doğan Group companies play a pioneering role across wide variety of sectors in which they operate, including energy, industry, fuel retail, financial services, internet & entertainment, automotive, tourism and real estate. Aiming global success in production and trade, we deliver our products and services across a vast geographical area. We also support employment in Turkey by directly providing jobs to 4,019 people as of 2021.

Sustainability is, and will remain, our key value and we believe that we must develop comprehensive solutions to global and local challenges together.

We understand that ensuring a healthy future means protecting the environment, and our value-focused perspective drives us to make a positive impact. In our efforts to meet these challenges, we invest in areas that will add value in the future. Our Sustainability Policy is at the core of our corporate governance system and we share it with every individual and organization that joins us on our journey, from employees to suppliers, customers and business partners.

To highlight the impact, we are generating for a low carbon economy;

Committed to making clean energy accessible to all, we design innovative systems and service platforms to promote sustainable energy production in our energy business. We significantly contribute to the national economy by reducing Turkey's current deficit in the energy field, as it produces approximately 1.9 TWh annually using domestic and national resources through its hydraulic, wind and solar power plants.

One of the main contributors of our performance is our energy utilities company Galata Wind, which has a total installed capacity of 269 MW as of the end of 2021, consisting of wind and solar power plants. As a company that generates 100% renewable energy-based electricity, Galata Wind Enerji A.Ş. ensure a decrease of approximately 400,000 tonnes of carbon emission (CO<sub>2</sub>e) per year with its electricity production capacity of approximately 775 GWh. With its positive environmental impact and solid financial performance Galata Wind has become Turkey's first green public offering (Green IPO) lately. To ensure this process, Galata Wind went through a 3rd party assurance regarding its ESG performance. Included in the "Robust" category as a result of this particular ESG (Environmental, Social and Governance) rating (conducted by Vigeo EIRIS (acquired by Moody's)) at the beginning of the public offering process, Galata Wind Enerji internationally undertakes to never invest in fossil resources other than renewable resources, to eliminate direct operational carbon emissions (Scope-1) by the end of the year 2025, to verify and have carbon emission reductions approved until the end of the Gold Standard and VCS (Verified Carbon Standard) periods.

In our Automotive Trade & Marketing sector we are transforming our product portfolio for a low carbon economy by introducing fully electric vehicles (SUVs, Scooters) and charging solutions to the market.

In our Industry & Trade sector, Sesa Ambalaj continues to grow with an annual production capacity of 14.5 tonnes for new and sustainable packaging products while exporting 40% of its production thanks to its commitment to research, development, and innovation.

In our financial services sector, Doğan Investment Bank, 100% owned by Doğan Group, started its operations as of 2021. The Bank adopted the sustainability vision of the group within the scope of 'Doğan Impact Plan' and prioritized compliance with international sustainability standards in its loan policies. It aims to contribute to the green transformation of Turkish companies and to mediate in the provision of resources from national and international markets due to the obligations brought by the EU Green Deal.

Apart from these direct & business model related contributions from our sectors to clean technologies, we are actively engaged with carbon efficiency due to our commitments covered in our long-term vision: "Doğan Impact Plan". "Doğan Impact Plan" focuses on the areas of "investing in our planet", "investing in an inclusive society" and "investing in the future", with each impact area serving UN's Sustainable Development Goals. We integrated this plan into the business processes of all our companies. One of the major commitments of "Investing in our planet" pillar is to be carbon neutral in our operations (Scope-1+2) covering all our sectors.

### C0.2

#### (C0.2) State the start and end date of the year for which you are reporting data.

	Start date	End date	Indicate if you are providing emissions data for past reporting years	Select the number of past reporting years you will be providing emissions data for
Reporting year	January 1 2021	December 31 2021	Yes	1 year

### C0.3

#### (C0.3) Select the countries/areas in which you operate.

Turkey

### C0.4

(C0.4) Select the currency used for all financial information disclosed throughout your response.

TRY

## C0.5

(C0.5) Select the option that describes the reporting boundary for which climate-related impacts on your business are being reported. Note that this option should align with your chosen approach for consolidating your GHG inventory.

Operational control

## C-OG0.7

(C-OG0.7) Which part of the oil and gas value chain and other areas does your organization operate in?

Row 1

Oil and gas value chain

Downstream

Other divisions

## C0.8

(C0.8) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?

Indicate whether you are able to provide a unique identifier for your organization	Provide your unique identifier
Yes, an ISIN code	TRADOHOL91Q8

## C1. Governance

### C1.1

(C1.1) Is there board-level oversight of climate-related issues within your organization?

Yes

### C1.1a

(C1.1a) Identify the position(s) (do not include any names) of the individual(s) on the board with responsibility for climate-related issues.

Position of individual(s)	Please explain
Board Chair	Climate-related issues are governed by highest level ownership at Doğan Holding by the Board Chair. Sustainability Committee, operating under the Board of Directors, is the authority responsible for sustainability and climate-related issues. Our Board Chair monitors the progress of our Sustainability Committee closely. With the leadership of our Board Chair, Board of Directors considers climate-related issues when reviewing and guiding our business strategy, major plans of action, risk management policies, annual budgets, and budget plans as well as, setting our performance objectives, monitoring implementation and performance, and overseeing major capital expenditures, acquisitions, and divestitures. This indicates the importance of climate-related issues & our affiliated management approach in the sectors we operate.
Chief Executive Officer (CEO)	Our CEO has one of the other members on the board who has the direct responsibility for sustainability & climate-related issues at Doğan Holding. Our CEO drives the efforts of the group companies by leading the group level Executive Committee & our board-level Sustainability Committee, where he carries any progress related to our climate change management efforts directly to the Board.
Director on board	An independent director on board is responsible for sustainability and climate-related issues at Doğan Holding. This particular member of the board provides consultation and drives the vision of the board related to climate-related issues from a global perspective.

### C1.1b

**(C1.1b) Provide further details on the board's oversight of climate-related issues.**

Frequency with which climate-related issues are a scheduled agenda item	Governance mechanisms into which climate-related issues are integrated	Scope of board-level oversight	Please explain
Scheduled – all meetings	Reviewing and guiding strategy Reviewing and guiding major plans of action Reviewing and guiding risk management policies Reviewing and guiding annual budgets Reviewing and guiding business plans Setting performance objectives Monitoring implementation and performance of objectives Overseeing major capital expenditures, acquisitions and divestitures Monitoring and overseeing progress against goals and targets for addressing climate-related issues	<Not Applicable>	Climate-related issues are raised to the agenda of the board with scheduled meetings. They are integrated into governance mechanisms such as reviewing and guiding strategy, major plans of action, risk management policies, business plans and sustainability policies. We monitor the implementation & performance of our corporate climate related objectives. Also oversight of major capital expenditures, acquisitions & divestitures considering climate change are raised to the agenda of the board with scheduled meetings.

**C1.1d**

**(C1.1d) Does your organization have at least one board member with competence on climate-related issues?**

	Board member(s) have competence on climate-related issues	Criteria used to assess competence of board member(s) on climate-related issues	Primary reason for no board-level competence on climate-related issues	Explain why your organization does not have at least one board member with competence on climate-related issues and any plans to address board-level competence in the future
Row 1	No, but we plan to address this within the next two years	<Not Applicable>	Important but not an immediate priority	We've two board members who have competence on sustainability-related issues. They are not specifically competent on climate-related issues and we plan to address this need within the next two years.

**C1.2**

**(C1.2) Provide the highest management-level position(s) or committee(s) with responsibility for climate-related issues.**

Name of the position(s) and/or committee(s)	Reporting line	Responsibility	Coverage of responsibility	Frequency of reporting to the board on climate-related issues
Sustainability committee	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	Quarterly

**C1.2a**

**(C1.2a) Describe where in the organizational structure this/these position(s) and/or committees lie, what their associated responsibilities are, and how climate-related issues are monitored (do not include the names of individuals).**

Climate-related issues are governed by highest level ownership at Doğan Holding by the Board Chair. Sustainability Committee, operating under the Board of Directors, is the authority responsible for sustainability and climate-related issues. Our Board Chair monitors the progress of our Sustainability Committee closely. With the leadership of our Board Chair, Board of Directors considers climate-related issues when reviewing and guiding our business strategy, major plans of action, risk management policies, annual budgets, and budget plans as well as, setting our performance objectives, monitoring implementation and performance, and overseeing major capital expenditures, acquisitions, and divestitures. This indicates the importance of climate-related issues & our affiliated management approach in the sectors we operate.

**C1.3**

**(C1.3) Do you provide incentives for the management of climate-related issues, including the attainment of targets?**

	Provide incentives for the management of climate-related issues	Comment
Row 1	Yes	We are actively engaged in combating with climate change due to our commitments covered in our long-term vision: "Doğan Impact Plan". "Doğan Impact Plan" focuses on the areas of "investing in our planet", "investing in an inclusive society" and "investing in the future", with each impact area serving UN's Sustainable Development Goals. We integrated this plan into the business processes of all our companies. One of the major commitments of "Investing in our planet" pillar is to be carbon neutral in our operations (Scope-1+2) covering all our sectors by 2030 (with the baseline year of 2019). Following the execution & implementation of Doğan Impact Plan this year, we've started to form the KPIs of our climate target. These KPIs takes part in our corporate performance system and incentivize the progress of our employees starting from C-level and cascading to lesser positions.

**C1.3a**

**(C1.3a) Provide further details on the incentives provided for the management of climate-related issues (do not include the names of individuals).**

Entitled to incentive	Type of incentive	Activity incentivized	Comment
Chief Executive Officer (CEO)	Monetary reward	Emissions reduction target Energy reduction target Efficiency target	Following the execution & implementation of Doğan Impact Plan this year, KPIs of our climate target are being defined. These KPIs takes part in our corporate performance system and incentivize the progress of our CEO related our emission reduction target.
Chief Sustainability Officer (CSO)	Monetary reward	Emissions reduction target Energy reduction target Efficiency target	Following the execution & implementation of Doğan Impact Plan this year, KPIs of our climate target are being defined. These KPIs takes part in our corporate performance system and incentivize the progress of our Chief Sustainability Officer related our emission reduction target.
Environment/Sustainability manager	Monetary reward	Emissions reduction target Energy reduction target Efficiency target	Following the execution & implementation of Doğan Impact Plan this year, KPIs of our climate target are being defined. These KPIs takes part in our corporate performance system and incentivize the progress of our Sustainability Manager related our emission reduction target.
Other, please specify (Investor Relations Director)	Monetary reward	Company performance against a climate-related sustainability index	Our Investor Relations Director is responsible for taking part in BIST Sustainability Index assured via their performance card. Taking part in the aforementioned Index requires fulfilment of several climate-related tasks and upon fulfilment of this responsibility, they are incentivized with a monetary reward.

**C2. Risks and opportunities**

**C2.1**

**(C2.1) Does your organization have a process for identifying, assessing, and responding to climate-related risks and opportunities?**

Yes

**C2.1a**

**(C2.1a) How does your organization define short-, medium- and long-term time horizons?**

	From (years)	To (years)	Comment
Short-term	0	1	Our short-term horizon is defined as 1 year which covers our OPEX and CAPEX plan in our annual financial budgets.
Medium-term	1	3	Medium-term is defined as 1-3 years which covers a time horizon parallel to the review & revision of our business strategy.
Long-term	3	10	Time horizon ranging from 3-10 years is considered as long term in our corporate system.

**C2.1b**

**(C2.1b) How does your organization define substantive financial or strategic impact on your business?**

The substantive financial/strategic impact is related with the risk rate level and defined according to probable/expected financial loss. In the calculation of substantive financial & strategic impact, we considered parameters related to constant amounts of financial impact.

As Doğan Group operates across various sectors, our substantive financial impact figures differ between our sectors & group companies. This is due to the fact, different sectoral risks pose varying substantive financial impacts. Considering this fact, our group level **definition of substantive financial impact** is accepted as **equal and higher as 10% of corporate capital per our affiliated group company.**

That's why we put all group companies on a weighting scale. For the risks with a high score, we also include the share of the Company's size in our total asset size.

To identify the most material risks we perform detailed risk analysis by sectors, compare global trends and conduct peer analysis in the relevant sectors. Risks are determined under categories such; financial, operational, strategic, reputational, legal, cyber and natural disaster. The Risk Committee, The Board and Executive Committee are aware of the material risks and take them into account on their short, medium, and long term strategic plans.

In our risk inventory, climate risks are categorized under natural disaster category. Climate related negative reputation risks may have a substantive impact on our stakeholders' concerns resulting with a loss in profitability and market value. In our risk rating methodology, each risk is rated considering its possibility, effect and also based on the extent of our subsidiaries and/or relevant operations.

**C2.2**

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**(C2.2) Describe your process(es) for identifying, assessing and responding to climate-related risks and opportunities.**

**Value chain stage(s) covered**

Direct operations  
Upstream  
Downstream

**Risk management process**

Integrated into multi-disciplinary company-wide risk management process

**Frequency of assessment**

Annually

**Time horizon(s) covered**

Short-term  
Medium-term  
Long-term

**Description of process**

Doğan Holding's operations cover a wide scope from developing products and services that create value for the lives of its stakeholders to the evaluation, mitigation or elimination of the impacts resulting from its investments. The comprehensive perspective resulting from its responsible investor holding approach requires developing products and services in various sectors from renewable energy projects supporting a low carbon economy to the strengthening of the local development. These initiatives contribute to the solution of the problems whose importance are also emphasized in the UN Sustainable Development Goals. Parallel to this mindset, Doğan Holding's risk management approach included in the scope of its transparent, fair and accountable corporate governance structure enables the Holding & group companies to evaluate and manage risks on our operational & strategic risks. We're in the process of embedding climate-related risks into our overall risk management system in accordance with TCFD's climate-related risks definition. By this process current risk management practices of the Holding is being reviewed. During this review climate-related issues are also taken into account and will be fully integrated into our multi-disciplinary company-wide risk identification, assessment, and management processes in the following reporting years.

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**C2.2a**

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**(C2.2a) Which risk types are considered in your organization's climate-related risk assessments?**

	Relevance & inclusion	Please explain
Current regulation	Relevant, always included	Current regulations are considered to have direct and indirect effects on our operations. As our operations are expanding, any design and renovation activity related to our existing and qualifying buildings (offices etc.) will have to meet minimum requirements related to Regulation on Energy Performance in Buildings. This may cause additional costs to our operations. Apart from this, Regulatory Framework on "Monitoring GHG Emissions" may impact international borrowing capacity of our group companies. These are planned to be considered in our prospective climate-related risk assessments.
Emerging regulation	Relevant, always included	We constantly consider emerging regulations and actively searching for possible related risks in our risk horizon. A possible carbon tax and emission trading system is considered to bring along risks and opportunities on different scales all along our value chain. Other possible risks related to emerging regulations are also under evaluation and will be included in our risk taxonomy.
Technology	Relevant, always included	Technology related risks are relevant and always included when our operations are considered. Since we're operating in various locations with our group companies throughout Turkey and abroad, rise of mean temperatures will cause additional costs for the upgrade of our current air conditioning systems with more energy efficient ones. Apart from that, the need for upgrading our current manufacturing structure with lower emission components parallel to our 2030 net-zero target will require technological investments which will result in CAPEX increase.
Legal	Relevant, always included	Doğan Holding consider legal risks related to climate change varying from uncertainties and their prospective outcomes to possible environmental sanctions and fines. That's why, as our climate related risk identification efforts proceed, we're proactively taking any possible legal risk into account. Spectrum of climate-related legal risks vary from our upstream all along to our downstream activities.
Market	Relevant, always included	We're considering climate related market risks as one of the major risks on our business. Therefore, we're working to figure out the ways in which markets could be affected by climate change. Shifts in supply and demand for certain commodities, products, and services as climate-related risks and opportunities are increasingly taken into account while reviewing our integrated risk management approach.
Reputation	Relevant, always included	Doğan Holding contributes to sustainable development, directly and indirectly, through the business models and operations of its group companies and supports the national economy. Doğan Holding's responsible investor holding approach enables it to both protect the reputation of the group and support high feasibility projects that create environmental and social benefits.
Acute physical	Relevant, always included	We consider acute physical climate risks as a reality. Such risks will have financial implications for any organization by implying direct damage to physical assets and will disrupt supply chains of related organizations. As we operate in multiple sectors, our group companies' financial performances are closely linked to various effects like water availability, sourcing, and quality; and extreme temperature changes.
Chronic physical	Relevant, always included	Long-term shifts in climate patterns (e.g., sustained higher temperatures) that might cause sea level rise or chronic heat waves may affect our operations.

**C2.3**

**(C2.3) Have you identified any inherent climate-related risks with the potential to have a substantive financial or strategic impact on your business?**

Yes

**C2.3a**

**(C2.3a) Provide details of risks identified with the potential to have a substantive financial or strategic impact on your business.**

**Identifier**

Risk 1

**Where in the value chain does the risk driver occur?**

Downstream

**Risk type & Primary climate-related risk driver**

Reputation	Shifts in consumer preferences
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**Primary potential financial impact**

Decreased revenues due to reduced demand for products and services

**Climate risk type mapped to traditional financial services industry risk classification**

<Not Applicable>

**Company-specific description**

In a transition to a low carbon economy, failing to meet the expectations of consumers (e.g., our B2B customers) may lead to decrease in our revenues. In the upcoming reporting years, we are planning to calculate case related financial impact figures of increased customer concern and assess it to indicate the cost of management.

**Time horizon**

Medium-term

**Likelihood**

Likely

**Magnitude of impact**

Medium

**Are you able to provide a potential financial impact figure?**

No, we do not have this figure

**Potential financial impact figure (currency)**

<Not Applicable>

**Potential financial impact figure – minimum (currency)**

<Not Applicable>

**Potential financial impact figure – maximum (currency)**

<Not Applicable>

**Explanation of financial impact figure**

We are in the process of calculating case related financial impact figures of increased customer concern and assess it to indicate the cost of management.

**Cost of response to risk****Description of response and explanation of cost calculation****Comment****Identifier**

Risk 2

**Where in the value chain does the risk driver occur?**

Direct operations

**Risk type & Primary climate-related risk driver**

Emerging regulation	Carbon pricing mechanisms
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**Primary potential financial impact**

Increased direct costs

**Climate risk type mapped to traditional financial services industry risk classification**

<Not Applicable>

**Company-specific description**

EU Green Deal aims to prevent climate change and to leave sufficient resources for future generations. It is also an enormous transition project that envisages the ambitious transformation of the EU economy on the axis of this climate change goal. The ultimate target of the Green Deal is to ensure that EU becomes a "carbon neutral" (zero emission) continent by 2050. Considering all the policies and enablers of the Green Deal including circular economy to just adjustment mechanism, sustainable finance action plan to Carbon Border Adjustment Mechanism, one can easily predict that Turkish economy and trade with EU will be affected in a great deal of ways. One of the most important one is Carbon Border Adjustment in which companies that export raw materials, intermediate products or final products to the EU may be subject to some form of carbon tax for the products they export pursuant to a carbon border adjustment mechanism (CBAM) to be introduced by the Commission by 2023. Some of our group companies may be exposed to carbon tax in the upcoming alterations of CBAM due to their export to EU. We're in the process of assessing the financial impact of this particular carbon pricing related risk which is relevant for some of our companies.

**Time horizon**

Medium-term

**Likelihood**

Virtually certain

**Magnitude of impact**

Medium-high

**Are you able to provide a potential financial impact figure?**

No, we do not have this figure

**Potential financial impact figure (currency)**

<Not Applicable>

**Potential financial impact figure – minimum (currency)**

<Not Applicable>

**Potential financial impact figure – maximum (currency)**

<Not Applicable>

**Explanation of financial impact figure**

We're in the process of assessing the financial impact of this particular carbon pricing related risk which is relevant for some of our companies.

**Cost of response to risk****Description of response and explanation of cost calculation****Comment****Identifier**

Risk 3

**Where in the value chain does the risk driver occur?**

Direct operations

**Risk type & Primary climate-related risk driver**

Acute physical	Other, please specify (All weather-related risks associated with climate change)
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**Primary potential financial impact**

Decreased revenues due to reduced production capacity

**Climate risk type mapped to traditional financial services industry risk classification**

<Not Applicable>

**Company-specific description**

Humanity is facing physical risks of climate change ranging from acute risks like hurricanes, floods, wildfires as well as chronic risks such as extreme heat, drought, pandemics etc. These risks may lead to financial losses in case of physical damage to our assets, increased operational expenses and etc.

**Time horizon**

Long-term

**Likelihood**

Likely

**Magnitude of impact**

Medium-high

**Are you able to provide a potential financial impact figure?**

No, we do not have this figure

**Potential financial impact figure (currency)**

&lt;Not Applicable&gt;

**Potential financial impact figure – minimum (currency)**

&lt;Not Applicable&gt;

**Potential financial impact figure – maximum (currency)**

&lt;Not Applicable&gt;

**Explanation of financial impact figure**

We're in the process of assessing the financial impact of this particular climate-related risks.

**Cost of response to risk****Description of response and explanation of cost calculation****Comment**

## C2.4

**(C2.4) Have you identified any climate-related opportunities with the potential to have a substantive financial or strategic impact on your business?**

Yes

## C2.4a

**(C2.4a) Provide details of opportunities identified with the potential to have a substantive financial or strategic impact on your business.****Identifier**

Opp1

**Where in the value chain does the opportunity occur?**

Downstream

**Opportunity type**

Products and services

**Primary climate-related opportunity driver**

Development and/or expansion of low emission goods and services

**Primary potential financial impact**

Increased revenues resulting from increased production capacity

**Company-specific description**

There is statistical evidence that global demand for renewable energy use increases year on year since 1970s. The trend shows that there is 3% increase to renewable energy in 2020 as demand for all other fuels declined (IEA). The primary driver was an almost 7% growth in electricity generation from renewable sources. Long-term contracts, priority access to the grid, and continuous installation of new plants underpinned renewables growth despite lower electricity demand, supply chain challenges, and construction delays in many parts of the world. Renewable electricity generation in 2021 expanded by more than 8% to reach 8,300 TWh, the fastest year-on-year growth since the 1970s. Solar PV and wind are set to contribute two-thirds of renewables growth. One of our group companies Galata Wind is engaged exclusively in renewables, and has several wind and solar power plants in its portfolio which will result as a seizure of this global opportunity. As and evidence of increasing global trend to renewable electricity Galata Wind Enerji A.Ş. ensured a revenue of 540.2 mio TRYs in 2021 fiscal year with an increase of 61% approximately in comparison to 2020.

**Time horizon**

Short-term

**Likelihood**

Very likely

**Magnitude of impact**

High

**Are you able to provide a potential financial impact figure?**

Yes, a single figure estimate

**Potential financial impact figure (currency)**

205000000

**Potential financial impact figure – minimum (currency)**

&lt;Not Applicable&gt;

**Potential financial impact figure – maximum (currency)**

&lt;Not Applicable&gt;

**Explanation of financial impact figure**

As and evidence of increasing global trend to renewable electricity Galata Wind Enerji A.Ş. ensured a revenue of 540.2 mio TRYs in 2021 fiscal year with an increase of 61% (205 mio TRYs approximately) in comparison to 2020.



**Cost to realize opportunity**

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**Strategy to realize opportunity and explanation of cost calculation**

Conducting regular research related to global renewable electricity outlook.

**Comment**

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**Identifier**

Opp2

**Where in the value chain does the opportunity occur?**

Downstream

**Opportunity type**

Resource efficiency

**Primary climate-related opportunity driver**

Use of more efficient modes of transport

**Primary potential financial impact**

Increased revenues resulting from increased demand for products and services

**Company-specific description**

Sales of electric cars (including fully electric and plug-in hybrids) doubled in 2021 to a new record of 6.6 million, with more now sold each week than in the whole of 2012, according to the latest edition of the annual Global Electric Vehicle Outlook. Despite strains along global supply chains, sales kept rising strongly into 2022, with 2 million electric cars sold worldwide in the first quarter, up by three-quarters from the same period a year earlier. The number of electric cars on the world's roads by the end of 2021 was about 16.5 million, triple the amount in 2018. Due to this trend we're expanding our lower emissioned vehicle portfolio (i.e., hybrid & full electric) in our automotive retail company "Doğan Trend". This will result in increased revenues due to increased demand for products and services.

**Time horizon**

Medium-term

**Likelihood**

Likely

**Magnitude of impact**

Medium-high

**Are you able to provide a potential financial impact figure?**

No, we do not have this figure

**Potential financial impact figure (currency)**

<Not Applicable>

**Potential financial impact figure – minimum (currency)**

<Not Applicable>

**Potential financial impact figure – maximum (currency)**

<Not Applicable>

**Explanation of financial impact figure**

We're in the process of assessing the financial impact of this particular climate-related opportunity.

**Cost to realize opportunity**

**Strategy to realize opportunity and explanation of cost calculation**

**Comment**

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C3. Business Strategy

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C3.1

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**(C3.1) Does your organization's strategy include a transition plan that aligns with a 1.5°C world?**

**Row 1**

**Transition plan**

No, but our strategy has been influenced by climate-related risks and opportunities, and we are developing a transition plan within two years

**Publicly available transition plan**

<Not Applicable>

**Mechanism by which feedback is collected from shareholders on your transition plan**

<Not Applicable>

**Description of feedback mechanism**

<Not Applicable>

**Frequency of feedback collection**

<Not Applicable>

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

<Not Applicable>

**Explain why your organization does not have a transition plan that aligns with a 1.5°C world and any plans to develop one in the future**

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 1+2) of our group companies as of 2030. We monitor the implementation & performance of Doğan Impact Plan's targets including the aforementioned 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., 1.5°C degree pathways, scenario analysis etc.) We're accelerating 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.

**Explain why climate-related risks and opportunities have not influenced your strategy**

<Not Applicable>

**C3.2**

**(C3.2) Does your organization use climate-related scenario analysis to inform its strategy?**

	Use of climate-related scenario analysis to inform strategy	Primary reason why your organization does not use climate-related scenario analysis to inform its strategy	Explain why your organization does not use climate-related scenario analysis to inform its strategy and any plans to use it in the future
Row 1	No, but we anticipate using qualitative and/or quantitative analysis in the next two years	Important but not an immediate priority	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., 1.5°C degree pathways, scenario analysis etc.) We're accelerating our efforts to use relevant climate scenarios (both quantitative and qualitative) to inform and deepen our understanding on long-term impact of climate change on our business.

**C3.3**

**(C3.3) Describe where and how climate-related risks and opportunities have influenced your strategy.**

	Have climate-related risks and opportunities influenced your strategy in this area?	Description of influence
Products and services	Yes	Increased awareness about climate change and its effects are driving consumer behaviour in today's world. Independent from any sector, consumers' demand for low carbon products and services see an incremental increase for the past years. Under these circumstances, Doğan Holding is accelerating its efforts to transform its product and services portfolio of group companies to meet the needs of customer demands and strengthen its position as an enabling actor for a transition to a low carbon economy.
Supply chain and/or value chain	Yes	As Doğan Holding impacts various sectors and their affiliated stakeholders, it's obvious that there are multiple, embedded climate-related risks and opportunities all along our investment and value chain. Effective identification and assessment of related risks will bring along opportunities like increased revenue due to increased market share by the enabling effect of new and innovative products and services.
Investment in R&D	Yes	We're investing in R&D activities to mitigate/adapt to climate change as of today in various sectors we operate. Transition to a low carbon economy will bring along new means of technological & financial tools. This will create opportunities to develop new and innovative products and services to the market.
Operations	Yes	As climate risks and opportunities are considered through the lens of our operations, electricity and fuel consumption related to our activities are the main components of interest. Renewable electricity production in our energy generation sector and procurement of green energy in our group companies are critical aspects of our portfolio.

**C3.4**

**(C3.4) Describe where and how climate-related risks and opportunities have influenced your financial planning.**

	Financial planning elements that have been influenced	Description of influence
Row 1	Revenues Direct costs Capital expenditures Capital allocation Acquisitions and divestments	Our financial planning process is influenced by climate-related risks and opportunities at varying levels ranging from revenues, direct costs, capital expenditures, capital allocation to acquisitions and divestments. Regarding Direct costs/ CAPEXs/ Capital allocation: We monitor the implementation & performance of Doğan Impact Plan's climate target annually starting in the financial planning phase of our group companies. Climate-related actions defined by our group companies in the financial planning phase are also assessed in terms of their possible climate mitigation impacts (CO2e) alongside with their financial metrics (e.g., direct costs, ROI). By the help of this approach actions are assessed with a 2-dimensional approach. Actions with greater impact in terms of climate mitigation are prioritized. This prioritization paves the way to channel our investments directly to low carbon business models. Direct costs, capital expenditures, capital allocation associated with our prioritized actions in terms of combating climate change till the end of 2024 is approximately 625 mio TRYs. Regarding Revenues: We're trying to increase the portion of our revenues generated from our low carbon products and services. One of the main contributors of our low carbon revenue performance is our energy utilities company Galata Wind, which has a total installed capacity of 269 MW as of the end of 2021, consisting of wind and solar power plants. As a company that generates 100% renewable energy-based electricity, Galata Wind Enerji A.Ş. ensured a revenue of 540.2 mio TRYs in 2021 fiscal year with an increase of 61% approximately in comparison to 2020. Regarding acquisitions and divestments: Group level investment committee considers sustainability and climate-related dimensions of new business and manage acquisitions and divestments with these approach in mind.

**C4. Targets and performance**

**C4.1**

**(C4.1) Did you have an emissions target that was active in the reporting year?**

Absolute target

**C4.1a**

**(C4.1a) Provide details of your absolute emissions target(s) and progress made against those targets.**

**Target reference number**

Abs 1

**Year target was set**

2020

**Target coverage**

Company-wide

**Scope(s)**

Scope 1

Scope 2

**Scope 2 accounting method**

Market-based

**Scope 3 category(ies)**

<Not Applicable>

**Base year**

2019

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

20394.65

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

28343.38

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

<Not Applicable>

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

48738.03

**Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1**

100

**Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2**

100

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

<Not Applicable>

**Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes**

100

**Target year**

2030

**Targeted reduction from base year (%)**

100

**Total emissions in target year covered by target in all selected Scopes (metric tons CO2e) [auto-calculated]**

0

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

17329.92

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

29895.66

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

<Not Applicable>

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

47225.58

**% of target achieved relative to base year [auto-calculated]**

3.10322349918533

**Target status in reporting year**

Underway

**Is this a science-based target?**

No, but we anticipate setting one in the next 2 years

**Target ambition**

<Not Applicable>

**Please explain target coverage and identify any exclusions**

We are actively engaged in combating with climate change due to our commitments covered in our long-term vision: "Doğan Impact Plan". "Doğan Impact Plan" focuses on the areas of "investing in our planet", "investing in an inclusive society" and "investing in the future", with each impact area serving UN's Sustainable Development Goals. We integrated this plan into the business processes of all our companies. One of the major commitments of "Investing in our planet" pillar is to be carbon neutral in our operations (Scope-1+2) covering all our sectors by 2030 (with the baseline year of 2019).

**Plan for achieving target, and progress made to the end of the reporting year**

We will use 5 key instruments to reach our 2030 climate target: o Structured energy reduction & efficiency plans (consisting of dedicated programmes & projects) of our sectors, o Certified & Green Electricity Procurement for all our companies (to decrease Scope-2 emissions incrementally), o Installment of renewable sources for self & decentralized consumption of green electricity whenever & wherever feasible, o Climate change adaptation investments in our sectors to manage physical risks associated with changing weather patterns & extreme weather events, o Verifiable & certified carbon-offsets.

**List the emissions reduction initiatives which contributed most to achieving this target**

<Not Applicable>

**C4.2**

**(C4.2) Did you have any other climate-related targets that were active in the reporting year?**

No other climate-related targets

**C-OG4.2d**

**(C-OG4.2d) Indicate which targets reported in C4.1a/b incorporate methane emissions, or if you do not have a methane-specific emissions reduction target for your oil and gas activities, please explain why not and forecast how your methane emissions will change over the next five years.**

This question is not relevant for our oil & gas activities since we operate only as a fuel retailer in downstream section of oil & gas value chain.

**C4.3**

**(C4.3) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.**

Yes

**C4.3a**

**(C4.3a) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.**

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e (only for rows marked *)
Under investigation	2	3738.66
To be implemented*	6	982.46
Implementation commenced*	1	157.07
Implemented*	0	0
Not to be implemented	0	0

C4.3b

(C4.3b) Provide details on the initiatives implemented in the reporting year in the table below.

**Initiative category & Initiative type**

Transportation	Company fleet vehicle replacement
----------------	-----------------------------------

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

157.07

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 1

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

50000

**Investment required (unit currency – as specified in C0.4)**

702196

**Payback period**

11-15 years

**Estimated lifetime of the initiative**

16-20 years

**Comment**

Company fleet (4 regular, diesel engined vehicles, 1 diesel truck) of our group company "Çelik Halat" is being replaced by hybrid vehicles and a more fuel efficient truck. Investment required is calculated with actual EUR/TRY rate as of today (2022). Annual monetary savings (in unit currency) is calculated from estimated annual fuel reduction that will occur as a result of company vehicle fleet replacement.

**Initiative category & Initiative type**

Energy efficiency in production processes	Machine/equipment replacement
---	-------------------------------

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

174.8

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 1

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

372600

**Investment required (unit currency – as specified in C0.4)**

1046000

**Payback period**

1-3 years

**Estimated lifetime of the initiative**

6-10 years

**Comment**

Natural gas boilers are being replaced with more fuel efficient ones in our group company "Çelik Halat". Investment required is calculated with actual EUR/TRY rate as of today (2022). Annual monetary savings (in unit currency) is calculated from estimated annual natural gas reduction that will occur as a result of boiler replacement.

**Initiative category & Initiative type**

Energy efficiency in production processes	Other, please specify (Insulation of hot water installations)
---	---

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

141.6

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 1

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

459540

**Investment required (unit currency – as specified in C0.4)**

523000

**Payback period**

1-3 years

**Estimated lifetime of the initiative**

6-10 years

**Comment**

Insulation of hot water installations in our group company "Çelik Halat". Investment required is calculated with actual EUR/TRY rate as of today (2022). Annual monetary savings (in unit currency) is calculated from estimated annual natural gas reduction that will occur as a result of this particular insulation.

**Initiative category & Initiative type**

Non-energy industrial process emissions reductions	Other, please specify (Elimination of air and oil leaks)
--	--

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

62

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 2 (market-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

90000

**Investment required (unit currency – as specified in C0.4)**

2615000

**Payback period**

&gt;25 years

**Estimated lifetime of the initiative**

&gt;30 years

**Comment**

Elimination of air & oil leaks in pressurized air lines in our group company "Çelik Halat". Investment required is calculated with actual EUR/TRY rate as of today (2022). Annual monetary savings (in unit currency) is calculated from estimated electricity reduction that will occur as a result of this particular elimination.

**Initiative category & Initiative type**

Low-carbon energy generation	Solar PV
------------------------------	----------

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

286

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 2 (market-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

2054580

**Investment required (unit currency – as specified in C0.4)**

8716667

**Payback period**

4-10 years

**Estimated lifetime of the initiative**

21-30 years

**Comment**

Installation of a 150 kWp rooftop PV (estimated annual electricity generation=600 MWh) in our group company "Çelik Halat". Investment required is calculated with actual EUR/TRY rate as of today (2022). Annual monetary savings (in unit currency) is calculated from estimated electricity generation and unit electricity price of Turkey's electricity market. Estimated lifetime of commercial PV systems is 25-30 years.

**Initiative category & Initiative type**

Low-carbon energy generation	Wind
------------------------------	------

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

1908.87

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 2 (market-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

13713028

**Investment required (unit currency – as specified in C0.4)**

43583335

**Payback period**

1-3 years

**Estimated lifetime of the initiative**

21-30 years

**Comment**

Installation of a 1 MWp (approx.) wind turbine (estimated annual electricity generation=4004.622 MWh) in our group company "Sesa Ambalaj". Investment required is calculated with actual EUR/TRY rate as of today (2022). Annual monetary savings (in unit currency) is calculated from estimated electricity generation and unit electricity price of Turkey's electricity market. Estimated lifetime of Wind Power systems is 20-25 years.

**Initiative category & Initiative type**

Transportation	Company fleet vehicle replacement
----------------	-----------------------------------

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

196.53

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 1

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

1819903

**Investment required (unit currency – as specified in C0.4)**

5100000

**Payback period**

1-3 years

**Estimated lifetime of the initiative**

6-10 years

**Comment**

Company fleet (5 diesel engined tanker trucks) of our group company "Aytemiz" is being replaced by more fuel efficient ones. Annual monetary savings (in unit currency) is calculated from estimated annual fuel (diesel) reduction that will occur as a result of company vehicle replacement.

**Initiative category & Initiative type**

Transportation	Company fleet vehicle efficiency
----------------	----------------------------------

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

121.53

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 1

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

1125408

**Investment required (unit currency – as specified in C0.4)**

625600

**Payback period**

&lt;1 year

**Estimated lifetime of the initiative**

3-5 years

**Comment**

Route optimization of our LPG Tankers in our group company "Aytemiz" will result with a reduction in annual diesel consumption. Annual monetary savings (in unit currency) is calculated from estimated annual fuel (diesel) reduction that will occur as a result of route optimization.

**Initiative category & Initiative type**

Low-carbon energy generation	Solar PV
------------------------------	----------

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

1829.79

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 2 (market-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

13144929

**Investment required (unit currency – as specified in C0.4)**

35232452

**Payback period**

1-3 years

**Estimated lifetime of the initiative**

21-30 years

**Comment**

Installation of a 959.68 kWp (approx.) rooftop PV (estimated annual electricity generation=3838.72 MWh) in our group company "Ditaş". Investment required is calculated with actual USD/TRY rate as of today (2022). Annual monetary savings (in unit currency) is calculated from estimated electricity generation and unit electricity price of Turkey's electricity market. Estimated lifetime of commercial PV systems is 25-30 years.

**C4.3c**

**(C4.3c) What methods do you use to drive investment in emissions reduction activities?**

Method	Comment
Compliance with regulatory requirements/standards	In some of group companies/ in the assets of our group companies Investments required by standards such as ISO14001 and ISO50001 are supported by Doğan Holding. The budgets of systems such as automation, remote monitoring and LED conversion, which will contribute to environmental management systems with opportunities such as monitoring consumption and detecting losses, are provided within the framework of this understanding.
Internal incentives/recognition programs	One particular method we use to drive investment in emissions reduction activities is internal incentives/recognition programmes. As stated in detail also in C1.3a, our emission reduction target is directly linked to energy reduction & energy efficiency objectives starting from the performance card of our CEO.
Dedicated budget for energy efficiency	One of the main instruments to reach our 2030 climate target is structured energy reduction & efficiency plans (consisting of dedicated programmes & projects) of our sectors. That's why we have a dedicated annual budget for energy efficiency.

**C4.5**

**(C4.5) Do you classify any of your existing goods and/or services as low-carbon products?**

Yes

**C4.5a**



**(C4.5a) Provide details of your products and/or services that you classify as low-carbon products.**

**Level of aggregation**

Group of products or services

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

Other, please specify (Own taxonomy)

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

Power	Other, please specify (Solar PV & Wind Power Installations)
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**Description of product(s) or service(s)**

One of the main contributors of our climate change performance is Galata Wind, which has a total installed capacity of 269 MW as of 2021, consisting of wind and solar power plants. As a company that generates 100% renewable energy-based electricity, Galata Wind ensure a decrease of approximately 369,675 tonnes of GHG emissions (CO2e) per annum with its electricity production capacity of approximately 775,000 MWh.

**Have you estimated the avoided emissions of this low-carbon product(s) or service(s)**

Yes

**Methodology used to calculate avoided emissions**

Other, please specify (The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition))

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

Use stage

**Functional unit used**

1 MWh of electricity generated.

**Reference product/service or baseline scenario used**

Turkey Electricity Grid's 2021 emission factor (tonnes of CO2e per MWh of electricity generated) = 0.477

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

Use stage

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

369675

**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)).

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

3.2

**C-OG4.6**

**(C-OG4.6) Describe your organization's efforts to reduce methane emissions from your activities.**

This question is not relevant for our oil & gas activities since **we operate only as a fuel retailer in downstream section of oil & gas value chain.**

**C-OG4.7**

**(C-OG4.7) Does your organization conduct leak detection and repair (LDAR) or use other methods to find and fix fugitive methane emissions from oil and gas production activities?**

No, this is not relevant to our operations

**C-OG4.7b**

**(C-OG4.7b) Explain why you do not conduct LDAR or use other methods to find and fix fugitive methane emissions, and whether you have a plan to do so from your oil and gas production activities.**

This question is not relevant for our oil & gas activities since **we operate only as a fuel retailer in downstream section of oil & gas value chain.**

**C-OG4.8**

**(C-OG4.8) If flaring is relevant to your oil and gas production activities, describe your organization's efforts to reduce flaring, including any flaring reduction targets.**

This question is not relevant for our oil & gas activities since **we operate only as a fuel retailer in downstream section of oil & gas value chain.**

C5. Emissions methodology

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C5.1

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(C5.1) Is this your first year of reporting emissions data to CDP?

No

C5.1a

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(C5.1a) 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?

Row 1

Has there been a structural change?

No

Name of organization(s) acquired, divested from, or merged with

<Not Applicable>

Details of structural change(s), including completion dates

<Not Applicable>

C5.1b

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(C5.1b) 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?	Details of methodology, boundary, and/or reporting year definition change(s)
Row 1	Yes, a change in boundary	In our financial services sector, Doğan Investment Bank, 100% owned by Doğan Group, started its operations as of 2021. That's why 2021 emissions of Doğan Investment Bank is added in our consolidated emission figures different than 2020 reporting year.

C5.1c

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(C5.1c) Have your organization's base year emissions been recalculated as result of the changes or errors reported in C5.1a and C5.1b?

	Base year recalculation	Base year emissions recalculation policy, including significance threshold
Row 1	Yes	Our data granularity and accuracy has increased compared to previous reporting year as some of our group companies have adopted international standards related to environmental management, energy management and GHG accounting (ISO 14001, ISO 50001, ISO 14064). That's why our base year emissions have been recalculated.

C5.2

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(C5.2) Provide your base year and base year emissions.

Scope 1

Base year start

January 1 2019

Base year end

December 31 2019

Base year emissions (metric tons CO2e)

20394.65

Comment

Our base year Scope 1 Emissions is the consolidated value of our group companies' Scope 1 emissions for the YE2019.

### Scope 2 (location-based)

**Base year start**

January 1 2019

**Base year end**

December 31 2019

**Base year emissions (metric tons CO2e)**

28343.38

**Comment**

Our base year Scope 2 Emissions is the consolidated value of our group companies' Scope 2 emissions for the YE2019. 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)

**Base year start**

January 1 2019

**Base year end**

December 31 2019

**Base year emissions (metric tons CO2e)**

28343.38

**Comment**

Our base year Scope 2 Emissions is the consolidated value of our group companies' Scope 2 emissions for the YE2019. 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

**Base year start****Base year end****Base year emissions (metric tons CO2e)****Comment**

Scope 3 category 1: Purchased goods and services is not calculated for base year (2019).

### Scope 3 category 2: Capital goods

**Base year start****Base year end****Base year emissions (metric tons CO2e)****Comment**

Scope 3 category 2: Capital goods is not calculated for base year (2019).

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

**Base year start****Base year end****Base year emissions (metric tons CO2e)****Comment**

Scope 3 category 3: Fuel-and-energy-related activities (not included in Scope 1 or 2) is not calculated for base year (2019).

### Scope 3 category 4: Upstream transportation and distribution

**Base year start****Base year end****Base year emissions (metric tons CO2e)****Comment**

Scope 3 category 4: Upstream transportation and distribution is not calculated for base year (2019).

### Scope 3 category 5: Waste generated in operations

**Base year start****Base year end****Base year emissions (metric tons CO2e)****Comment**

Scope 3 category 5: Waste generated in operations is not calculated for base year (2019).

**Scope 3 category 6: Business travel**

**Base year start**

January 1 2019

**Base year end**

December 31 2019

**Base year emissions (metric tons CO2e)**

**Comment**

Scope 3 category 6: Business travel is not calculated for base year (2019).

**Scope 3 category 7: Employee commuting**

**Base year start**

January 1 2019

**Base year end**

December 31 2019

**Base year emissions (metric tons CO2e)**

**Comment**

Scope 3 category 7: Employee commuting is not calculated for base year (2019).

**Scope 3 category 8: Upstream leased assets**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

Scope 3 category 8: Upstream leased assets is not calculated for base year (2019).

**Scope 3 category 9: Downstream transportation and distribution**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

Scope 3 category 9: Downstream transportation and distribution is not calculated for base year (2019).

**Scope 3 category 10: Processing of sold products**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

Scope 3 category 10: Processing of sold products is not calculated for base year (2019).

**Scope 3 category 11: Use of sold products**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

Scope 3 category 11: Use of sold products is not calculated for base year (2019).

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

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

Scope 3 category 12: End of life treatment of sold products is not calculated for base year (2019).

**Scope 3 category 13: Downstream leased assets**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

Scope 3 category 13: Downstream leased assets is not calculated for base year (2019).

**Scope 3 category 14: Franchises**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

Scope 3 category 14: Franchises is not calculated for base year (2019).

**Scope 3 category 15: Investments**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

Scope 3 category 15: Investments is not calculated for base year (2019).

**Scope 3: Other (upstream)**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

Scope 3: Other (upstream) is not calculated for base year (2019).

**Scope 3: Other (downstream)**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

Scope 3: Other (downstream) is not calculated for base year (2019).

C5.3

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**(C5.3) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.**

The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

C6. Emissions data

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C6.1

---

**(C6.1) What were your organization's gross global Scope 1 emissions in metric tons CO2e?**

**Reporting year**

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

17324.64

**Start date**

January 1 2021

**End date**

December 31 2021

**Comment**

Our reporting year Scope 1 Emissions is the consolidated value of our group companies' Scope 1 emissions for the YE2021.

**Past year 1**

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

18127.89

**Start date**

January 1 2020

**End date**

December 31 2020

**Comment**

Our past year Scope 1 Emissions is the consolidated value of our group companies' Scope 1 emissions for the YE2020.

## C6.2

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### (C6.2) Describe your organization's approach to reporting Scope 2 emissions.

#### Row 1

##### Scope 2, location-based

We are reporting a Scope 2, location-based figure

##### Scope 2, market-based

We are reporting a Scope 2, market-based figure

##### 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.

## C6.3

---

### (C6.3) What were your organization's gross global Scope 2 emissions in metric tons CO<sub>2</sub>e?

#### Reporting year

##### Scope 2, location-based

29895.66

##### Scope 2, market-based (if applicable)

29895.66

##### Start date

January 1 2021

##### End date

December 31 2021

##### Comment

Our reporting year Scope 2 Emissions is the consolidated value of our group companies' Scope 2 emissions for the YE2021. 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

##### Scope 2, location-based

27127.04

##### Scope 2, market-based (if applicable)

27127.04

##### Start date

January 1 2020

##### End date

December 31 2020

##### Comment

Our past year Scope 2 Emissions is the consolidated value of our group companies' Scope 2 emissions for the YE2020. 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.

## C6.4

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### (C6.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure?

No

## C6.5

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### (C6.5) Account for your organization's gross global Scope 3 emissions, disclosing and explaining any exclusions.

**Purchased goods and services**

**Evaluation status**

Relevant, not yet calculated

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

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

**Capital goods**

**Evaluation status**

Relevant, not yet calculated

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

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

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

**Evaluation status**

Relevant, not yet calculated

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

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

**Upstream transportation and distribution**

**Evaluation status**

Relevant, not yet calculated

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

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

**Waste generated in operations**

**Evaluation status**

Relevant, not yet calculated

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

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

## Business travel

### Evaluation status

Relevant, calculated

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

121.42

### Emissions calculation methodology

Fuel-based method

Distance-based method

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

### Please explain

Scope 3: Business Travel is the consolidated calculation of our group companies flight data (passenger.km) (domestic short haul flights, medium range flights (up to 4000kms), international flights) for 2021YE.

## Employee commuting

### Evaluation status

Relevant, calculated

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

986.32

### Emissions calculation methodology

Fuel-based method

Distance-based method

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

### Please explain

Scope 3: Employee Commuting is the consolidated calculation of our group companies commute data ( personnel shuttles, buses and taxi travels of employees.) for 2021YE.

## Upstream leased assets

### Evaluation status

Not relevant, explanation provided

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

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

## Downstream transportation and distribution

### Evaluation status

Relevant, not yet calculated

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

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

## Processing of sold products

### Evaluation status

Relevant, not yet calculated

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

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain



## Use of sold products

### Evaluation status

Relevant, not yet calculated

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

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

## End of life treatment of sold products

### Evaluation status

Relevant, not yet calculated

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

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

## Downstream leased assets

### Evaluation status

Relevant, not yet calculated

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

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

## Franchises

### Evaluation status

Not relevant, explanation provided

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

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

We do not own any franchises.

## Investments

### Evaluation status

Relevant, not yet calculated

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

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

**Other (upstream)**

**Evaluation status**

Not relevant, explanation provided

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

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

**Other (downstream)**

**Evaluation status**

Not relevant, explanation provided

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

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

C6.5a

---

(C6.5a) Disclose or restate your Scope 3 emissions data for previous years.

**Past year 1**

**Start date**

January 1 2020

**End date**

December 31 2020

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

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

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

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

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

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

60.08

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

810.52

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

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

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

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

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

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

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

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

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

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

**Comment**

C6.7

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(C6.7) Are carbon dioxide emissions from biogenic carbon relevant to your organization?

No

## C6.10

---

**(C6.10) 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.**

**Intensity figure**

2.791

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

47220.3

**Metric denominator**

unit total revenue

**Metric denominator: Unit total**

16921

**Scope 2 figure used**

Market-based

**% change from previous year**

33.6

**Direction of change**

Decreased

**Reason for change**

Calculation Methodology: - Our group level consolidated revenues are: 10,770 M TRYs (for 2020), 16,921 M TRYs (for 2021). - Our group level consolidated Scope 1+2 carbon emissions are: 45,254.93 tCO2e (for 2020), 47,220.30 tCO2e (for 2021). Although our gross global combined Scope 1+2 emissions increased from 2020 to 2021, our intensity measure decreased since we've decoupled our financial growth from our climate impact.

---

## C-OG6.12

---

**(C-OG6.12) Provide the intensity figures for Scope 1 emissions (metric tons CO2e) per unit of hydrocarbon category.**

**Unit of hydrocarbon category (denominator)**

Please select

**Metric tons CO2e from hydrocarbon category per unit specified**

**% change from previous year**

**Direction of change**

<Not Applicable>

**Reason for change**

This question is not relevant for our oil & gas activities since we operate only as a fuel retailer in downstream section of oil & gas value chain.

**Comment**

This question is not relevant for our oil & gas activities since we operate only as a fuel retailer in downstream section of oil & gas value chain.

---

## C-OG6.13

---

**(C-OG6.13) Report your methane emissions as percentages of natural gas and hydrocarbon production or throughput.**

**Oil and gas business division**

Please select

**Estimated total methane emitted expressed as % of natural gas production or throughput at given division**

**Estimated total methane emitted expressed as % of total hydrocarbon production or throughput at given division**

**Comment**

This question is not relevant for our oil & gas activities since we operate only as a fuel retailer in downstream section of oil & gas value chain.

---

## C7. Emissions breakdowns

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### C7.1

---

**(C7.1) Does your organization break down its Scope 1 emissions by greenhouse gas type?**

Yes

C7.1a

(C7.1a) Break down your total gross global Scope 1 emissions by greenhouse gas type and provide the source of each used greenhouse warming potential (GWP).

Greenhouse gas	Scope 1 emissions (metric tons of CO2e)	GWP Reference
CO2	17139.43	IPCC Sixth Assessment Report (AR6 - 100 year)
CH4	31.51	IPCC Sixth Assessment Report (AR6 - 100 year)
N2O	153.71	IPCC Sixth Assessment Report (AR6 - 100 year)

C-OG7.1b

(C-OG7.1b) Break down your total gross global Scope 1 emissions from oil and gas value chain production activities by greenhouse gas type.

C7.2

(C7.2) Break down your total gross global Scope 1 emissions by country/region.

Country/Region	Scope 1 emissions (metric tons CO2e)
Turkey	17324.64

C7.3

(C7.3) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.

By activity

C7.3c

(C7.3c) Break down your total gross global Scope 1 emissions by business activity.

Activity	Scope 1 emissions (metric tons CO2e)
Fleet	8112.26
Refrigerants	99.29
Generators	43.81
Heating/Process	7882.39
Fire extinguishers	1156.35
Gas transformers	30.55

C-CE7.4/C-CH7.4/C-CO7.4/C-EU7.4/C-MM7.4/C-OG7.4/C-ST7.4/C-TO7.4/C-TS7.4

(C-CE7.4/C-CH7.4/C-CO7.4/C-EU7.4/C-MM7.4/C-OG7.4/C-ST7.4/C-TO7.4/C-TS7.4) Break down your organization's total gross global Scope 1 emissions by sector production activity in metric tons CO2e.

	Gross Scope 1 emissions, metric tons CO2e	Net Scope 1 emissions , metric tons CO2e	Comment
Cement production activities	<Not Applicable>	<Not Applicable>	<Not Applicable>
Chemicals production activities	<Not Applicable>	<Not Applicable>	<Not Applicable>
Coal production activities	<Not Applicable>	<Not Applicable>	<Not Applicable>
Electric utility activities	<Not Applicable>	<Not Applicable>	<Not Applicable>
Metals and mining production activities	<Not Applicable>	<Not Applicable>	<Not Applicable>
Oil and gas production activities (upstream)	0	<Not Applicable>	This question is not relevant for our oil & gas activities since we operate only as a fuel retailer in downstream section of oil & gas value chain.
Oil and gas production activities (midstream)	0	<Not Applicable>	This question is not relevant for our oil & gas activities since we operate only as a fuel retailer in downstream section of oil & gas value chain.
Oil and gas production activities (downstream)	0	<Not Applicable>	This question is not relevant for our oil & gas activities since we operate only as a fuel retailer in downstream section of oil & gas value chain.
Steel production activities	<Not Applicable>	<Not Applicable>	<Not Applicable>
Transport OEM activities	<Not Applicable>	<Not Applicable>	<Not Applicable>
Transport services activities	<Not Applicable>	<Not Applicable>	<Not Applicable>

## C7.5

(C7.5) Break down your total gross global Scope 2 emissions by country/region.

Country/Region	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Turkey	29895.66	29895.66

## C7.6

(C7.6) Indicate which gross global Scope 2 emissions breakdowns you are able to provide.

By activity

### C7.6c

(C7.6c) Break down your total gross global Scope 2 emissions by business activity.

Activity	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Electric - cooling	10463.48	10463.48
Electric - other	19432.18	19432.18

## C-CE7.7IC-CH7.7IC-CO7.7IC-MM7.7IC-OG7.7IC-ST7.7IC-TO7.7IC-TS7.7

(C-CE7.7IC-CH7.7IC-CO7.7IC-MM7.7IC-OG7.7IC-ST7.7IC-TO7.7IC-TS7.7) Break down your organization's total gross global Scope 2 emissions by sector production activity in metric tons CO2e.

	Scope 2, location-based, metric tons CO2e	Scope 2, market-based (if applicable), metric tons CO2e	Comment
Cement production activities	<Not Applicable>	<Not Applicable>	<Not Applicable>
Chemicals production activities	<Not Applicable>	<Not Applicable>	<Not Applicable>
Coal production activities	<Not Applicable>	<Not Applicable>	<Not Applicable>
Metals and mining production activities	<Not Applicable>	<Not Applicable>	<Not Applicable>
Oil and gas production activities (upstream)	0	0	This question is not relevant for our oil & gas activities since we operate only as a fuel retailer in downstream section of oil & gas value chain.
Oil and gas production activities (midstream)	0	0	This question is not relevant for our oil & gas activities since we operate only as a fuel retailer in downstream section of oil & gas value chain.
Oil and gas production activities (downstream)	0	0	This question is not relevant for our oil & gas activities since we operate only as a fuel retailer in downstream section of oil & gas value chain.
Steel production activities	<Not Applicable>	<Not Applicable>	<Not Applicable>
Transport OEM activities	<Not Applicable>	<Not Applicable>	<Not Applicable>
Transport services activities	<Not Applicable>	<Not Applicable>	<Not Applicable>

## C7.9

(C7.9) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Increased

### C7.9a

**(C7.9a) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.**

	Change in emissions (metric tons CO2e)	Direction of change	Emissions value (percentage)	Please explain calculation
Change in renewable energy consumption		<Not Applicable >		
Other emissions reduction activities		<Not Applicable >		
Divestment		<Not Applicable >		
Acquisitions		<Not Applicable >		
Mergers		<Not Applicable >		
Change in output	1945.55	Increased	4.3	Increase due to organic growth in our automotive (our group company Trend Otomotiv), industry (group companies Ditaş, Sesa), electric utilities (group company Galata Wind) sectors.
Change in methodology		<Not Applicable >		
Change in boundary	19.82	Increased	0.043	In our financial services sector, Doğan Investment Bank, 100% owned by Doğan Group, started its operations as of 2021. That's why an additional 19.82 tonnes of CO2e increase comes from change in operational boundary.
Change in physical operating conditions		<Not Applicable >		
Unidentified		<Not Applicable >		
Other		<Not Applicable >		

### C7.9b

**(C7.9b) Are your emissions performance calculations in C7.9 and C7.9a based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?**

Market-based

### C8. Energy

#### C8.1

**(C8.1) What percentage of your total operational spend in the reporting year was on energy?**

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

#### C8.2

**(C8.2) 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)	Yes
Consumption of purchased or acquired electricity	Yes
Consumption of purchased or acquired heat	No
Consumption of purchased or acquired steam	No
Consumption of purchased or acquired cooling	No
Generation of electricity, heat, steam, or cooling	Yes

#### C8.2a

**(C8.2a) Report your organization's energy consumption totals (excluding feedstocks) in MWh.**

	Heating value	MWh from renewable sources	MWh from non-renewable sources	Total (renewable and non-renewable) MWh
Consumption of fuel (excluding feedstock)	LHV (lower heating value)	0	69085.38	69085.38
Consumption of purchased or acquired electricity	<Not Applicable>	376.37	65054.81	65431.18
Consumption of purchased or acquired heat	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Consumption of purchased or acquired steam	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Consumption of purchased or acquired cooling	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Consumption of self-generated non-fuel renewable energy	<Not Applicable>	376.37	<Not Applicable>	376.37
Total energy consumption	<Not Applicable>	376.37	134140.19	134516.56

**C8.2b**

**(C8.2b) 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	Yes
Consumption of fuel for the generation of heat	Yes
Consumption of fuel for the generation of steam	No
Consumption of fuel for the generation of cooling	No
Consumption of fuel for co-generation or tri-generation	Yes

**C8.2c**

**(C8.2c) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.**

**Sustainable biomass**

**Heating value**

**Total fuel MWh consumed by the organization**

**MWh fuel consumed for self-generation of electricity**

**MWh fuel consumed for self-generation of heat**

**MWh fuel consumed for self-generation of steam**

<Not Applicable>

**MWh fuel consumed for self-generation of cooling**

<Not Applicable>

**MWh fuel consumed for self- cogeneration or self-trigeneration**

**Comment**

None in the reporting year.

**Other biomass**

**Heating value**

**Total fuel MWh consumed by the organization**

**MWh fuel consumed for self-generation of electricity**

**MWh fuel consumed for self-generation of heat**

**MWh fuel consumed for self-generation of steam**

<Not Applicable>

**MWh fuel consumed for self-generation of cooling**

<Not Applicable>

**MWh fuel consumed for self- cogeneration or self-trigeneration**

**Comment**

None in the reporting year.

**Other renewable fuels (e.g. renewable hydrogen)**

**Heating value**

Total fuel MWh consumed by the organization

MWh fuel consumed for self-generation of electricity

MWh fuel consumed for self-generation of heat

MWh fuel consumed for self-generation of steam

<Not Applicable>

MWh fuel consumed for self-generation of cooling

<Not Applicable>

MWh fuel consumed for self- cogeneration or self-trigeneration

**Comment**

None in the reporting year.

**Coal**

**Heating value**

Total fuel MWh consumed by the organization

MWh fuel consumed for self-generation of electricity

MWh fuel consumed for self-generation of heat

MWh fuel consumed for self-generation of steam

<Not Applicable>

MWh fuel consumed for self-generation of cooling

<Not Applicable>

MWh fuel consumed for self- cogeneration or self-trigeneration

**Comment**

None in the reporting year.

**Oil**

**Heating value**

Total fuel MWh consumed by the organization

MWh fuel consumed for self-generation of electricity

MWh fuel consumed for self-generation of heat

MWh fuel consumed for self-generation of steam

<Not Applicable>

MWh fuel consumed for self-generation of cooling

<Not Applicable>

MWh fuel consumed for self- cogeneration or self-trigeneration

**Comment**

None in the reporting year.

**Gas**

**Heating value**

LHV

Total fuel MWh consumed by the organization

38905.87

MWh fuel consumed for self-generation of electricity

0

MWh fuel consumed for self-generation of heat

38905.11

MWh fuel consumed for self-generation of steam

<Not Applicable>

MWh fuel consumed for self-generation of cooling

<Not Applicable>

MWh fuel consumed for self- cogeneration or self-trigeneration

0.76

**Comment**

Total fuel MWh consumed by the organization= (Consolidated consumption figure of natural gas for heating purposes.) + (Consolidated consumption figure of LPG for heating purposes.) + (Consolidated consumption figure of natural gas for cogeneration.) +



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

**Heating value**

LHV

**Total fuel MWh consumed by the organization**

30179.5

**MWh fuel consumed for self-generation of electricity**

163.25

**MWh fuel consumed for self-generation of heat**

0

**MWh fuel consumed for self-generation of steam**

<Not Applicable>

**MWh fuel consumed for self-generation of cooling**

<Not Applicable>

**MWh fuel consumed for self- cogeneration or self-trigeneration**

0

**Comment**

Total fuel MWh consumed by the organization = (Consolidated consumption figure of diesel for transportation purposes.) + (Consolidated consumption figure of gasoline for transportation purposes.) + (Consolidated consumption figure of diesel used for electricity generation in generators.)

**Total fuel**

**Heating value**

LHV

**Total fuel MWh consumed by the organization**

69085.38

**MWh fuel consumed for self-generation of electricity**

163.25

**MWh fuel consumed for self-generation of heat**

38905.11

**MWh fuel consumed for self-generation of steam**

<Not Applicable>

**MWh fuel consumed for self-generation of cooling**

<Not Applicable>

**MWh fuel consumed for self- cogeneration or self-trigeneration**

0.76

**Comment**

Total fuel MWh consumed by the organization= (Consolidated consumption figure of natural gas for heating purposes.) + (Consolidated consumption figure of LPG for heating purposes.) + (Consolidated consumption figure of natural gas for cogeneration.) + (Consolidated consumption figure of diesel for transportation purposes.) + (Consolidated consumption figure of gasoline for transportation purposes.) + (Consolidated consumption figure of diesel used for electricity generation in generators.)

**C8.2d**

**(C8.2d) Provide details on the electricity, heat, steam, and cooling your organization has generated and consumed in the reporting year.**

	Total Gross generation (MWh)	Generation that is consumed by the organization (MWh)	Gross generation from renewable sources (MWh)	Generation from renewable sources that is consumed by the organization (MWh)
Electricity	539.63	539.63	376.37	376.37
Heat	38905.87	38905.87	0	0
Steam	0	0	0	0
Cooling	0	0	0	0

**C8.2e**

**(C8.2e) 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 C6.3.**

**Sourcing method**

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

**Energy carrier**

Electricity

**Low-carbon technology type**

Renewable energy mix, please specify (Wind & Solar)

**Country/area of low-carbon energy consumption**

Turkey

**Tracking instrument used**

Other, please specify (Own generation amounts of wind & solar plants)

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

376.37

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

Turkey

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

2010

**Comment**

---

**C8.2g**

---

**(C8.2g) Provide a breakdown of your non-fuel energy consumption by country.**

**Country/area**

Turkey

**Consumption of electricity (MWh)**

65431.18

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

65431.18

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

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**C9. Additional metrics**

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**C9.1**

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**(C9.1) Provide any additional climate-related metrics relevant to your business.**

**Description**

Energy usage

**Metric value**

7.95

**Metric numerator**

134516.55 MWh of energy used (2021YE)

**Metric denominator (intensity metric only)**

16,921 mio TRYs of total revenue (2021YE)

**% change from previous year**

27.3

**Direction of change**

Decreased

**Please explain**

Our energy intensity has decreased by 27.3% compared to 2020YE. That's due to the fact that our financial growth is decoupled from our climate impact.

---

**C-OG9.3a**

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**(C-OG9.3a) Disclose your total refinery throughput capacity in the reporting year in thousand barrels per day.**

	Total refinery throughput capacity (Thousand barrels per day)
Capacity	0

**C-OG9.3b**

**(C-OG9.3b) Disclose feedstocks processed in the reporting year in million barrels per year.**

	Throughput (Million barrels)	Comment
Oil	0	This question is not relevant for our oil & gas activities since we operate only as a fuel retailer in downstream section of oil & gas value chain.
Other feedstocks	0	This question is not relevant for our oil & gas activities since we operate only as a fuel retailer in downstream section of oil & gas value chain.
Total	0	This question is not relevant for our oil & gas activities since we operate only as a fuel retailer in downstream section of oil & gas value chain.

**C-OG9.3c**

**(C-OG9.3c) Are you able to break down your refinery products and net production?**

No

**C-CE9.6/C-CG9.6/C-CH9.6/C-CN9.6/C-CO9.6/C-EU9.6/C-MM9.6/C-OG9.6/C-RE9.6/C-ST9.6/C-TO9.6/C-TS9.6**

**(C-CE9.6/C-CG9.6/C-CH9.6/C-CN9.6/C-CO9.6/C-EU9.6/C-MM9.6/C-OG9.6/C-RE9.6/C-ST9.6/C-TO9.6/C-TS9.6) Does your organization invest in research and development (R&D) of low-carbon products or services related to your sector activities?**

	Investment in low-carbon R&D	Comment
Row 1	No	

**C-OG9.7**

**(C-OG9.7) Disclose the breakeven price (US\$/BOE) required for cash neutrality during the reporting year, i.e. where cash flow from operations covers CAPEX and dividends paid/ share buybacks.**

0

**C10. Verification**

**C10.1**

**(C10.1) Indicate the verification/assurance status that applies to your reported emissions.**

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

**C10.1a**

**(C10.1a) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.**

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

Underway but not complete for current reporting year – first year it has taken place

**Type of verification or assurance**

Limited assurance

**Attach the statement**

**Page/ section reference**

Scope 1 emissions assurance is underway but not complete for current reporting year – first year it has taken place.

**Relevant standard**

ISAE3000

**Proportion of reported emissions verified (%)**

100

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## C10.1b

---

**(C10.1b) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.**

**Scope 2 approach**

Scope 2 market-based

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

Underway but not complete for current reporting year – first year it has taken place

**Type of verification or assurance**

Limited assurance

**Attach the statement**

**Page/ section reference**

Scope 2 emissions assurance is underway but not complete for current reporting year – first year it has taken place.

**Relevant standard**

ISAE3000

**Proportion of reported emissions verified (%)**

100

---

## C10.1c

---

**(C10.1c) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.**

**Scope 3 category**

Scope 3: Business travel

Scope 3: Employee commuting

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

Underway but not complete for current reporting year – first year it has taken place

**Type of verification or assurance**

Limited assurance

**Attach the statement**

**Page/section reference**

Scope 3 emissions assurance (Business Travel, Employee Commuting) is underway but not complete for current reporting year – first year it has taken place.

**Relevant standard**

ISAE3000

**Proportion of reported emissions verified (%)**

100

---

## C10.2

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**(C10.2) Do you verify any climate-related information reported in your CDP disclosure other than the emissions figures reported in C6.1, C6.3, and C6.5?**  
No, but we are actively considering verifying within the next two years

## C11. Carbon pricing

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### C11.1

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**(C11.1) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?**  
No, and we do not anticipate being regulated in the next three years

### C11.2

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**(C11.2) Has your organization originated or purchased any project-based carbon credits within the reporting period?**  
Yes

### C11.2a

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**(C11.2a) Provide details of the project-based carbon credits originated or purchased by your organization in the reporting period.**

**Credit origination or credit purchase**

Credit origination

**Project type**

Wind

**Project identification**

Our group company Galata Wind Enerji Anonim Şirketi installed Taspınar Wind Power Project located at near the Korubasi village Nilüfer district of Bursa Province. The project consists of 14 turbines each with a capacity of 4.8 MW. Taspınar Wind Power Project became operational in the last quarter 2020 with a capacity of 60 MWe. The average electricity generation of the project is expected to be 190,000 MWh/year. The annual emission reductions are estimated as 100,000 tCO<sub>2</sub>-eq/year. The first validation period of 5 years has begun and 51,251 VERs (Voluntary Emission Reductions) is issued to Taspınar Wind Power Project for reporting year 2021.

**Verified to which standard**

Gold Standard

**Number of credits (metric tonnes CO<sub>2</sub>e)**

51251

**Number of credits (metric tonnes CO<sub>2</sub>e): Risk adjusted volume**

51251

**Credits cancelled**

No

**Purpose, e.g. compliance**

Voluntary Offsetting

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**Credit origination or credit purchase**

Credit origination

**Project type**

Wind

**Project identification**

Our group company Galata Wind Enerji A.S. installed Mersin Wind Farm Project with 62.7 MWh / 56.85 MWe installed capacity in Mut district of Mersin province, Turkey. The project has 20 turbines, 14 of them having an output of 3.0 MW and 6 of them of 3.45 MW. The average electricity generation of the project is expected to be 215,000 MWh/year. The annual emission reductions are estimated as 110,000 tCO<sub>2</sub>-eq/year. The project is in its second validation period and 19,307 VERs (Voluntary Emission Reductions) is issued to Mersin Wind Farm Power Project for reporting year 2021 (for Jan-Feb.)

**Verified to which standard**

Gold Standard

**Number of credits (metric tonnes CO<sub>2</sub>e)**

19307

**Number of credits (metric tonnes CO<sub>2</sub>e): Risk adjusted volume**

19307

**Credits cancelled**

No

**Purpose, e.g. compliance**

Voluntary Offsetting

---

**Credit origination or credit purchase**

Credit origination

**Project type**

Wind

**Project identification**

Our group company Galata Wind Enerji A.S. installed Sah WPP with 105 MWh/105 MWe installed capacity in Bandırma district of Balıkesir and Karacabey district of Bursa, Turkey. The project WPP have 35 turbines of which 22 turbines are in Balıkesir province, and 13 turbines are in Bursa province, each having an output of 3.0 MW. The average electricity generation of the project is expected to be 330,000 MWh/year. The annual emission reductions are estimated as 170,000 tCO<sub>2</sub>-eq/year. The project is in its second validation period and 38,458 VERs (Voluntary Emission Reductions) is issued to Sah WPP for reporting year 2021. (for Jan-Feb.)

**Verified to which standard**

Gold Standard

**Number of credits (metric tonnes CO<sub>2</sub>e)**

38458

**Number of credits (metric tonnes CO<sub>2</sub>e): Risk adjusted volume**

38458

**Credits cancelled**

No

**Purpose, e.g. compliance**

Voluntary Offsetting

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**C11.3**

**(C11.3) Does your organization use an internal price on carbon?**

No, but we anticipate doing so in the next two years

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**C12. Engagement**

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**C12.1**

**(C12.1) Do you engage with your value chain on climate-related issues?**

Yes, other partners in the value chain

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**C12.1d**

**(C12.1d) Give details of your climate-related engagement strategy with other partners in the value chain.**

As Doğan Holding, we ensure effective stakeholder engagement in our activities by developing collaborations with different stakeholder groups, particularly with non-governmental organizations. These initiatives are designed within a framework that complies with the group's sustainability mindset, contributes to the Sustainable Development Goals, and meets the current needs of the society. We engage with partners such as Global Compact Turkey Network, Business Council for Sustainable Development Turkey (BCSD Turkey), Turkish Industry and Business Association (TUSIAD).

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**C12.2**

**(C12.2) Do your suppliers have to meet climate-related requirements as part of your organization's purchasing process?**

No, but we plan to introduce climate-related requirements within the next two years

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**C12.3**

**(C12.3) Does your organization engage in activities that could either directly or indirectly influence policy, law, or regulation that may impact the climate?**

**Row 1**

**Direct or indirect engagement that could influence policy, law, or regulation that may impact the climate**

Yes, we engage directly with policy makers

**Does your organization have a public commitment or position statement to conduct your engagement activities in line with the goals of the Paris Agreement?**

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

**Attach commitment or position statement(s)**

<Not Applicable>

**Describe the process(es) your organization has in place to ensure that your engagement activities are consistent with your overall climate change strategy**

The sustainability approach adopted by Doğan Holding has a great impact on the multidimensional value creation in its activities. We develop products and services that make the lives of its stakeholders easier, contributing to the increase of social welfare and development of the country. The approach adopted by the group is based on a long-term and integrated management philosophy. Keeping the sustainability approach at the center of its business strategy, Doğan Holding performs its activities with an integrated and long-term perspective.

**Primary reason for not engaging in activities that could directly or indirectly influence policy, law, or regulation that may impact the climate**

<Not Applicable>

**Explain why your organization does not engage in activities that could directly or indirectly influence policy, law, or regulation that may impact the climate**

<Not Applicable>

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**C12.3a**

**(C12.3a) On what policy, law, or regulation that may impact the climate has your organization been engaging directly with policy makers in the reporting year?**

**Focus of policy, law, or regulation that may impact the climate**

Renewable energy generation

**Specify the policy, law, or regulation on which your organization is engaging with policy makers**

Energy Market Regulatory Authority (EMRA) Renewable Energy Support Mechanism / Feed-in-Tariff (YEKDEM)

**Policy, law, or regulation geographic coverage**

National

**Country/region the policy, law, or regulation applies to**

Turkey

**Your organization's position on the policy, law, or regulation**

Support with no exceptions

**Description of engagement with policy makers**

**Details of exceptions (if applicable) and your organization's proposed alternative approach to the policy, law or regulation**

<Not Applicable>

**Have you evaluated whether your organization's engagement is aligned with the goals of the Paris Agreement?**

No, we have not evaluated

**C12.4**

**(C12.4) Have you published information about your organization's response to climate change and GHG emissions performance for this reporting year in places other than in your CDP response? If so, please attach the publication(s).**

**Publication**

In voluntary sustainability report

**Status**

Underway – previous year attached

**Attach the document**

**Page/Section reference**

<https://www.doganholding.com.tr/Assets/dogancozum-2021-0096-surdurulebilirlik-raporu-ing.pdf>

**Content elements**

- Governance
- Strategy
- Risks & opportunities
- Emissions figures
- Emission targets
- Other metrics

**Comment**

**C15. Biodiversity**

**C15.1**

**(C15.1) Is there board-level oversight and/or executive management-level responsibility for biodiversity-related issues within your organization?**

	Board-level oversight and/or executive management-level responsibility for biodiversity-related issues	Description of oversight and objectives relating to biodiversity	Scope of board-level oversight
Row 1	Yes, both board-level oversight and executive management-level responsibility	Sustainability-related issues along with biodiversity (as it is highly interlinked with climate and water) are governed by highest level ownership at Doğan Holding by the Board Chair. Sustainability Committee, operating under the Board of Directors, is the authority responsible for sustainability and biodiversity-related issues. Our Board Chair monitors the progress of our Sustainability Committee closely. With the leadership of our Board Chair, Board of Directors considers biodiversity-related issues when reviewing and guiding our business strategy, major plans of action, risk management policies, annual budgets, and budget plans as well as, setting our performance objectives, monitoring implementation and performance, and overseeing major capital expenditures, acquisitions, and divestitures. This indicates the importance of biodiversity-related issues & our affiliated management approach in the sectors we operate. Our CEO has one of the other members on the board who has the direct responsibility for sustainability & biodiversity-related issues at Doğan Holding. Our CEO drives the efforts of the group companies by leading the group level Executive Committee & our board-level Sustainability Committee, where he carries any progress related to our biodiversity management efforts directly to the Board. In addition to these, an independent director on board is responsible for sustainability and biodiversity-related issues at Doğan Holding. This particular member of the board provides consultation and drives the vision of the board related to biodiversity-related issues from a global perspective.	<Not Applicable>



## C15.2

(C15.2) Has your organization made a public commitment and/or endorsed any initiatives related to biodiversity?

	Indicate whether your organization made a public commitment or endorsed any initiatives related to biodiversity	Biodiversity-related public commitments	Initiatives endorsed
Row 1	No, but we plan to do so within the next 2 years	<Not Applicable>	<Not Applicable>

## C15.3

(C15.3) Does your organization assess the impact of its value chain on biodiversity?

	Does your organization assess the impact of its value chain on biodiversity?	Portfolio
Row 1	No, but we plan to assess biodiversity-related impacts within the next two years	<Not Applicable>

## C15.4

(C15.4) What actions has your organization taken in the reporting year to progress your biodiversity-related commitments?

	Have you taken any actions in the reporting period to progress your biodiversity-related commitments?	Type of action taken to progress biodiversity- related commitments
Row 1	Yes, we are taking actions to progress our biodiversity-related commitments	Land/water protection Land/water management Species management Education & awareness Law & policy

## C15.5

(C15.5) 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
Row 1	Yes, we use indicators	State and benefit indicators Pressure indicators Response indicators

## C15.6

(C15.6) Have you published information about your organization's response to biodiversity-related issues for this reporting year in places other than in your CDP response? If so, please attach the publication(s).

Report type	Content elements	Attach the document and indicate where in the document the relevant biodiversity information is located
In voluntary sustainability report or other voluntary communications	Impacts on biodiversity Risks and opportunities	<a href="https://www.doganholding.com.tr/Assets/dogancozum-2021-0096-surdurulebilirlik-raporu-ing.pdf">https://www.doganholding.com.tr/Assets/dogancozum-2021-0096-surdurulebilirlik-raporu-ing.pdf</a> Pages: 31,75,82

## C16. Signoff

### C-FI

(C-FI) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

### C16.1

(C16.1) Provide details for the person that has signed off (approved) your CDP climate change response.

	Job title	Corresponding job category
Row 1	Chief Financial Officer - CFO, Member of Executive Committee.	Chief Financial Officer (CFO)

## Submit your response

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### In which language are you submitting your response?

English

### Please confirm how your response should be handled by CDP

	I understand that my response will be shared with all requesting stakeholders	Response permission
Please select your submission options	Yes	Public

### Please confirm below

I have read and accept the applicable Terms