DOĞAN ŞİRKETLER GRUBU HOLDİNG A.Ş. - Water Security 2023



W0. Introduction

W_{0.1}

(W0.1) Give a general description of and introduction to your organization.

Doğan Group operates across a vast geographical area and forms strategic partnerships with international groups in order to ensure the 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 transforming our investments with this vision in mind. Doğan Group companies play a pioneering role across a wide variety of sectors in which they operate, including energy, industry, fuel retail, financial services, internet & entertainment, automotive, tourism, and real estate. Aiming for 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 8,180 people as of 2022.

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 and are committed to making clean energy accessible to all, we design innovative systems and service platforms to promote sustainable energy production in our energy business.

Our Group company, Galata Wind, as one of Türkiye's leading renewable energy producers, continues its investments towards achieving its goal of reaching an installed capacity of 550 MW by 2025. While the work on the Taşpınar Hybrid Solar Power Plant continues, investments to increase the capacity of the Wind Power Plant, also located in Taşpınar, began in 2022. In addition, Galata Wind continued to expand its portfolio this year by purchasing the Alapınar WPP (Wind Power Plant) project in Muğla. In line with its growth strategy, Galata Wind will make a major contribution to Türkiye's transition to renewable energy by obtaining 45 million USD in financial support from the European Bank for Reconstruction and Development (EBRD).

The completed project will add an additional 9 MW to our existing capacity. Beyond that, the European Bank for Reconstruction and Development (EBRD) has allocated USD 45 million to support Galata Wind's capacity increase in renewable energy, which along with its other planned investments, will help the company realize its projections to save 80,000 tons of CO₂ emissions per year by generating approximately 150,000 MWh more renewable electricity annually. In addition, Sustainalytics, the world's leading ESG rating organization, rated Galata Wind A.Ş. as "Low Risk" with a score of 19.9 in its ESG risk report.

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 by its new and sustainable packaging products while exporting 40% of its production thanks to its commitment to research, development, and innovation. Sesa took significant steps, especially in R&D and achieved significant results during the year. Sesa also devised and implemented a detailed maintenance plan to reduce its electricity and natural gas consumption.

In our financial services sector, Doğan Investment Bank, 100% owned by Doğan Group, started its operations in 2021. The Bank adopted the sustainability vision of the group within the scope of the 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 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 the 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.

W-OG0.1a

(W-OG0.1a) Which business divisions in the oil & gas sector apply to your organization? Midstream/Downstream

W0.2

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(W0.2) State the start and end date of the year for which you are reporting data.

	Start date	End date
Reporting year	January 1 2022	December 31 2022

W0.3

(W0.3) Select the countries/areas in which you operate.

Turkey

W0.4

(W0.4) Select the currency used for all financial information disclosed throughout your response.

TRY

W0.5

(W0.5) Select the option that best describes the reporting boundary for companies, entities, or groups for which water impacts on your business are being reported.

Companies, entities or groups over which operational control is exercised

W0.6

(W0.6) Within this boundary, are there any geographies, facilities, water aspects, or other exclusions from your disclosure?

No

W0.7

(W0.7) 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

W1. Current state

W1.1

	importance	Indirect use importance rating	Please explain
Sufficient amounts of good quality freshwater available for use	Important	Important	Sufficient amounts of good quality freshwater available for use are of paramount importance for Doğan Holding, given its diverse portfolio of subsidiaries spanning multiple industries. Directly, water plays a critical role in various aspects of the company's operations across industries such as media, energy, retail, industry, and tourism. For example, water is essential for cooling systems in energy generation, supporting manufacturing processes in industrial operations, ensuring sanitary conditions in retail facilities, and maintaining optimal conditions for hospitality services in the tourism sector. Adequate freshwater supply is indispensable for these direct uses, enabling efficient and sustainable operations while complying with regulatory standards and environmental guidelines specific to each industry.
			Indirectly, the significance of water availability and quality extends to Doğan Holding's value chain, encompassing its subsidiaries, suppliers, partners, and customers across diverse sectors. The availability of sufficient freshwater resources is vital for industries that provide inputs or services to Doğan Holding's subsidiaries. Water scarcity or pollution can disrupt the availability and cost of raw materials, impact production capacities, and jeopardize the stability of the entire value chain. By recognizing and addressing water security, Doğan Holding fosters resilient and sustainable relationships with suppliers and partners, promoting responsible water management practices throughout the value chain and mitigating potential risks associated with water scarcity or pollution.
Sufficient amounts of recycled, brackish and/or produced water available for use	Important	Important	Sufficient amounts of recycled, brackish, and/or produced water available for use hold significant importance for Doğan Holding, both in terms of direct and indirect use. Directly, access to alternative water sources like recycled water allows the company to optimize water usage and reduce reliance on freshwater resources. By implementing efficient water recycling systems within its operations, Doğan Holding can conserve freshwater supplies, minimize environmental impact, and improve the overall efficiency of its processes, such as cooling systems, irrigation, and sanitation.
available for use			Indirectly, the availability of recycled, brackish, and/or produced water benefits Doğan Holding's value chain and broader ecosystem. By utilizing alternative water sources, the company can contribute to water conservation efforts, particularly in regions where water scarcity is a concern. This indirectly supports suppliers, partners, and customers within the value chain who rely on sustainable water resources for their own operations. By promoting responsible water management practices throughout the value chain, Doğan Holding helps foster a more resilient and sustainable business ecosystem while minimizing the risk of water-related disruptions.
			Moreover, considering the potential impacts of water scarcity on industries, the availability of brackish or produced water can play a vital role in Doğan Holding's operations, especially in sectors such as energy and manufacturing. In these industries, where large quantities of water are required, the utilization of brackish or produced water reduces pressure on freshwater sources and ensures reliable water supply for various processes, such as cooling and industrial operations. By effectively utilizing alternative water sources, Doğan Holding can enhance operational resilience, minimize water-related risks, and optimize resource allocation.

W1.2

(W1.2) Across all your operations, what proportion of the following water aspects are regularly measured and monitored?

	% of	Frequency of	Method of measurement	Please explain
	sites/facilities/operations	measurement		
Water withdrawals – total volumes	100%	Continuously	The metering system installed at the point of water entry allows Doğan Holding to accurately monitor and record the volume of water withdrawn from the grid for its operational needs as well as water discharges when relevant. This method provides a reliable measurement mechanism to track and report water usage/discharge, ensuring transparency and accountability in the company's water management practices.	By obtaining water usage data directly from the third-party grid, Doğan Holding can access accurate and validated information regarding its water consumption. This data serves as a basis for analyzing water usage patterns, identifying opportunities for efficiency improvements, and setting water conservation targets within the organization. Doğan Holding employs a measurement method that relies on withdrawing water from the grid to obtain accurate and verifiable data on its water consumption. This approach ensures transparency, facilitates benchmarking, and enables the company to track its progress in sustainable water management practices.
Water withdrawals – volumes by source	100%	Continuously	The metering system installed at the point of water entry allows Doğan Holding to accurately monitor and record the volume of water withdrawn from the grid for its operational needs as well as water discharges when relevant. This method provides a reliable measurement mechanism to track and report water usage/discharge, ensuring transparency and accountability in the company's water management practices.	By obtaining water usage data directly from the third-party grid, Doğan Holding can access accurate and validated information regarding its water consumption. This data serves as a basis for analyzing water usage patterns, identifying opportunities for efficiency improvements, and setting water conservation targets within the organization. Doğan Holding employs a measurement method that relies on withdrawing water from the grid to obtain accurate and verifiable data on its water consumption. This approach ensures transparency, facilitates benchmarking, and enables the company to track its progress in sustainable water management practices.
Entrained water associated with your metals & mining and/or coal sector activities - total volumes [only metals and mining and coal sectors]	<not applicable=""></not>	<not Applicable></not 	<not applicable=""></not>	<not applicable=""></not>
Produced water associated with your oil & gas sector activities - total volumes [only oil and gas sector]	Not relevant	<not Applicable></not 	<not applicable=""></not>	
Water withdrawals quality	100%	Continuously	The metering system installed at the point of water entry allows Doğan Holding to accurately monitor and record the volume of water withdrawn from the grid for its operational needs as well as water discharges when relevant. This method provides a reliable measurement mechanism to track and report water usage/discharge, ensuring transparency and accountability in the company's water management practices.	By obtaining water usage data directly from the third-party grid, Doğan Holding can access accurate and validated information regarding its water consumption. This data serves as a basis for analyzing water usage patterns, identifying opportunities for efficiency improvements, and setting water conservation targets within the organization. Doğan Holding employs a measurement method that relies on withdrawing water from the grid to obtain accurate and verifiable data on its water consumption. This approach ensures transparency, facilitates benchmarking, and enables the company to track its progress in sustainable water management practices.

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	% of sites/facilities/operations	Frequency of measurement	Method of measurement	Please explain
Water discharges – total volumes	100%	Continuously	The metering system installed at the point of water entry allows Doğan Holding to accurately monitor and record the volume of water withdrawn from the grid for its operational needs as well as water discharges when relevant. This method provides a reliable measurement mechanism to track and report water usage/discharge, ensuring transparency and accountability in the company's water management practices.	By obtaining water usage data directly from the third-party grid, Doğan Holding can access accurate and validated information regarding its water consumption. This data serves as a basis for analyzing water usage patterns, identifying opportunities for efficiency improvements, and setting water conservation targets within the organization.
				Doğan Holding employs a measurement method that relies on withdrawing water from the grid to obtain accurate and verifiable data on its water consumption. This approach ensures transparency, facilitates benchmarking, and enables the company to track its progress in sustainable water management practices.
Water discharges – volumes by destination	100%	Continuously	The metering system installed at the point of water entry allows Doğan Holding to accurately monitor and record the volume of water withdrawn from the grid for its operational needs as well as water discharges when relevant. This method provides a reliable measurement mechanism to track and report water usage/discharge, ensuring transparency and accountability in the company's water management practices.	By obtaining water usage data directly from the third-party grid, Doğan Holding can access accurate and validated information regarding its water consumption. This data serves as a basis for analyzing water usage patterns, identifying opportunities for efficiency improvements, and setting water conservation targets within the organization.
				Doğan Holding employs a measurement method that relies on withdrawing water from the grid to obtain accurate and verifiable data on its water consumption. This approach ensures transparency, facilitates benchmarking, and enables the company to track its progress in sustainable water management practices.
Water discharges – volumes by treatment method	100%	Continuously	The metering system installed at the point of water entry allows Doğan Holding to accurately monitor and record the volume of water withdrawn from the grid for its operational needs as well as water discharges when relevant. This method provides a reliable measurement mechanism to track and report water usage/discharge, ensuring transparency and accountability in the company's water management practices.	By obtaining water usage data directly from the third-party grid, Doğan Holding can access accurate and validated information regarding its water consumption. This data serves as a basis for analyzing water usage patterns, identifying opportunities for efficiency improvements, and setting water conservation targets within the organization.
				Doğan Holding employs a measurement method that relies on withdrawing water from the grid to obtain accurate and verifiable data on its water consumption. This approach ensures transparency, facilitates benchmarking, and enables the company to track its progress in sustainable water management practices.
Water discharge quality – by standard effluent parameters	100%	Continuously	The metering system installed at the point of water entry allows Doğan Holding to accurately monitor and record the volume of water withdrawn from the grid for its operational needs as well as water discharges when relevant. This method provides a reliable measurement mechanism to track and report water usage/discharge, ensuring transparency and accountability in the company's water management practices.	By obtaining water usage data directly from the third-party grid, Doğan Holding can access accurate and validated information regarding its water consumption. This data serves as a basis for analyzing water usage patterns, identifying opportunities for efficiency improvements, and setting water conservation targets within the organization.
				Doğan Holding employs a measurement method that relies on withdrawing water from the grid to obtain accurate and verifiable data on its water consumption. This approach ensures transparency, facilitates benchmarking, and enables the company to track its progress in sustainable water management practices.
Water discharge quality – emissions to water (nitrates, phosphates, pesticides, and/or other priority substances)	100%	Continuously	The metering system installed at the point of water entry allows Doğan Holding to accurately monitor and record the volume of water withdrawn from the grid for its operational needs as well as water discharges when relevant. This method provides a reliable measurement mechanism to track and report water usage/discharge, ensuring transparency and accountability in the company's water management practices.	By obtaining water usage data directly from the third-party grid, Doğan Holding can access accurate and validated information regarding its water consumption. This data serves as a basis for analyzing water usage patterns, identifying opportunities for efficiency improvements, and setting water conservation targets within the organization.
				Doğan Holding employs a measurement method that relies on withdrawing water from the grid to obtain accurate and verifiable data on its water consumption. This approach ensures transparency, facilitates benchmarking, and enables the company to track its progress in sustainable water management practices.
Water discharge quality – temperature	100%	Continuously	The metering system installed at the point of water entry allows Doğan Holding to accurately monitor and record the volume of water withdrawn from the grid for its operational needs as well as water discharges when relevant. This method provides a reliable measurement mechanism to track and report water usage/discharge, ensuring transparency and accountability in the company's water management practices.	By obtaining water usage data directly from the third-party grid, Doğan Holding can access accurate and validated information regarding its water consumption. This data serves as a basis for analyzing water usage patterns, identifying opportunities for efficiency improvements, and setting water conservation targets within the organization.
				Doğan Holding employs a measurement method that relies on withdrawing water from the grid to obtain accurate and verifiable data on its water consumption. This approach ensures transparency, facilitates benchmarking, and enables the company to track its progress in sustainable water management practices.
Water consumption – total volume	100%	Continuously	The metering system installed at the point of water entry allows Doğan Holding to accurately monitor and record the volume of water withdrawn from the grid for its operational needs as well as water discharges when relevant. This method provides a reliable measurement mechanism to track and report water usage/discharge, ensuring transparency and accountability in the company's water management practices.	By obtaining water usage data directly from the third-party grid, Doğan Holding can access accurate and validated information regarding its water consumption. This data serves as a basis for analyzing water usage patterns, identifying opportunities for efficiency improvements, and setting water conservation targets within the organization.
				Doğan Holding employs a measurement method that relies on withdrawing water from the grid to obtain accurate and verifiable data on its water consumption. This approach ensures transparency, facilitates benchmarking, and enables the company to track its progress in sustainable water management practices.

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	% of sites/facilities/operations		Method of measurement	Please explain
Water recycled/reused	100%	Continuously	Holding to accurately monitor and record the volume of water withdrawn from the grid for its operational needs as well as water discharges when relevant. This method provides a reliable measurement mechanism to track and report water usage/discharge, ensuring transparency and	By obtaining water usage data directly from the third-party grid, Doğan Holding can access accurate and validated information regarding its water consumption. This data serves as a basis for analyzing water usage patterns, identifying opportunities for efficiency improvements, and setting water conservation targets within the organization.
				Doğan Holding employs a measurement method that relies on withdrawing water from the grid to obtain accurate and verifiable data on its water consumption. This approach ensures transparency, facilitates benchmarking, and enables the company to track its progress in sustainable water management practices.
The provision of fully- functioning, safely managed WASH services to all workers	100%	Continuously	Holding to accurately monitor and record the volume of water withdrawn from the grid for its operational needs as well as water discharges when relevant. This method provides a reliable measurement mechanism to track and report water usage/discharge, ensuring transparency and accountability in the company's water management practices.	opportunities for efficiency improvements, and setting water conservation targets within the organization. Doğan Holding employs a measurement method that relies
				on withdrawing water from the grid to obtain accurate and verifiable data on its water consumption. This approach ensures transparency, facilitates benchmarking, and enables the company to track its progress in sustainable water management practices.

W1.2b

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	Volume (megaliters/year)	Comparison with previous reporting year	Primary reason for comparison with previous reporting year	Five- year forecast	Primary reason for forecast	Please explain
Total withdrawals	220.65	Higher	Increase/decrease in business activity	Higher	Increase/decrease in business activity	As Doğan Holding, we have experienced a substantial increase in our business activities, both in terms of revenue generated and the scale of our operations. This growth has led to a corresponding increase in our water withdrawals, consumption, and discharges. As our operations expand to meet market demands and seize new opportunities, the demand for water to support various processes and activities has naturally escalated.
						With our business activities continuing to grow, it is foreseeable that the trend of increased water withdrawals, consumption, and discharges will persist. As we strive to meet the needs of our expanding operations, such as manufacturing, energy production, and other essential activities, the demand for water resources becomes even more crucial.
						We recognize the importance of responsible water management and the need to address the potential implications of this increasing trend. It is essential for us to monitor and manage our water usage efficiently, minimize waste, and explore opportunities to improve water conservation practices across our operations.
						While growth presents challenges in terms of water resource management, we are committed to implementing sustainable solutions. We aim to adopt technologies, processes, and practices that promote water efficiency, reuse, and recycling. By integrating responsible water management into our growth strategy, we can work towards minimizing our impact on water resources and mitigating potential risks associated with increased withdrawals, consumption, and discharges.
						Furthermore, as part of our long-term planning, we understand the importance of considering the availability and sustainability of water resources in the regions where we operate. By engaging in dialogue with local communities, stakeholders, and relevant authorities, we aim to develop collaborative approaches that ensure responsible water use while supporting the growth and development of our business.
Total discharges	18.81	Higher	Increase/decrease in business activity	Higher	Increase/decrease in business activity	As Doğan Holding, we have experienced a substantial increase in our business activities, both in terms of revenue generated and the scale of our operations. This growth has led to a corresponding increase in our water withdrawals, consumption, and discharges. As our operations expand to meet market demands and seize new opportunities, the demand for water to support various processes and activities has naturally escalated.
						With our business activities continuing to grow, it is foreseeable that the trend of increased water withdrawals, consumption, and discharges will persist. As we strive to meet the needs of our expanding operations, such as manufacturing, energy production, and other essential activities, the demand for water resources becomes even more crucial.
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						Furthermore, as part of our long-term planning, we understand the importance of considering the availability and sustainability of water resources in the regions where we operate. By engaging in dialogue with local communities, stakeholders, and relevant authorities, we aim to develop collaborative approaches that ensure responsible water use while supporting the growth and development of our business.
Total consumption	201.84	Higher	Increase/decrease in business activity	Higher	Increase/decrease in business activity	As Doğan Holding, we have experienced a substantial increase in our business activities, both in terms of revenue generated and the scale of our operations. This growth has led to a corresponding increase in our water withdrawals, consumption, and discharges. As our operations expand to meet market demands and seize new opportunities, the demand for water to support various processes and activities has naturally escalated.
						With our business activities continuing to grow, it is foreseeable that the trend of increased water withdrawals, consumption, and discharges will persist. As we strive to meet the needs of our expanding operations, such as manufacturing, energy production, and other essential activities, the demand for water resources becomes even more crucial.
						We recognize the importance of responsible water management and the need to address the potential implications of this increasing trend. It is essential for us to monitor and manage our water usage efficiently, minimize waste, and explore opportunities to improve water conservation practices across our operations.
						While growth presents challenges in terms of water resource management, we are committed to implementing sustainable solutions. We aim to adopt technologies, processes, and practices that promote water efficiency, reuse, and recycling. By integrating responsible water management into our growth strategy, we can work towards minimizing our impact on water resources and mitigating potential risks associated with increased withdrawals, consumption, and discharges.
						Furthermore, as part of our long-term planning, we understand the importance of considering the availability and sustainability of water resources in the regions where we operate. By engaging in dialogue with local communities, stakeholders, and relevant authorities, we aim to develop collaborative approaches that ensure responsible water use while supporting the growth and development of our business.

W-OG1.2c

(W-OG1.2c) In your oil & gas sector operations, what are the total volumes of water withdrawn, discharged, and consumed (by business division), how do they compare to the previous reporting year, and how are they forecasted to change?

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	Volume (megaliters/year)	Comparison with previous reporting	Primary reason for comparison with previous reporting year	Five- year forecast	Primary reason for forecast	Please explain
		year	reporting year			
Total withdrawals - upstream	<not applicable=""></not>	<not Applicable></not 	<not applicable=""></not>	<not Applicab le></not 	<not applicable=""></not>	<not applicable=""></not>
Total discharges – upstream	<not applicable=""></not>	<not Applicable></not 	<not applicable=""></not>	<not Applicab le></not 	<not applicable=""></not>	<not applicable=""></not>
Total consumption – upstream	<not applicable=""></not>	<not Applicable></not 	<not applicable=""></not>	<not Applicab le></not 	<not applicable=""></not>	<not applicable=""></not>
Total withdrawals - midstream/downstream	100758	Higher	Increase/decrease in business activity		Increase/decrease in business activity	As Doğan Holding, we have experienced a substantial increase in our business activities, both in terms of revenue generated and the scale of our operations. This growth has led to a corresponding increase in our water withdrawals, consumption, and discharges. As our operations expand to meet market demands and seize new opportunities, the demand for water to support various processes and activities has naturally escalated. With our business activities continuing to grow, it is foreseeable that the trend of increased water
						withdrawals, consumption, and discharges will persist. As we strive to meet the needs of our expanding operations, such as manufacturing, energy production, and other essential activities, the demand for water resources becomes even more crucial.
						We recognize the importance of responsible water management and the need to address the potential implications of this increasing trend. It is essential for us to monitor and manage our water usage efficiently, minimize waste, and explore opportunities to improve water conservation practices across our operations.
						While growth presents challenges in terms of water resource management, we are committed to implementing sustainable solutions. We aim to adopt technologies, processes, and practices that promote water efficiency, reuse, and recycling. By integrating responsible water management into our growth strategy, we can work towards minimizing our impact on water resources and mitigating potential risks associated with increased withdrawals, consumption, and discharges.
						Furthermore, as part of our long-term planning, we understand the importance of considering the availability and sustainability of water resources in the regions where we operate. By engaging in dialogue with local communities, stakeholders, and relevant authorities, we aim to develop collaborative approaches that ensure responsible water use while supporting the growth and development of our business.
Total discharges – midstream/downstream	8304.74	Higher	Increase/decrease in business activity	About the same	Increase/decrease in business activity	As Doğan Holding, we have experienced a substantial increase in our business activities, both in terms of revenue generated and the scale of our operations. This growth has led to a corresponding increase in our water withdrawals, consumption, and discharges. As our operations expand to meet market demands and seize new opportunities, the demand for water to support various processes and activities has naturally escalated.
						With our business activities continuing to grow, it is foreseeable that the trend of increased water withdrawals, consumption, and discharges will persist. As we strive to meet the needs of our expanding operations, such as manufacturing, energy production, and other essential activities, the demand for water resources becomes even more crucial.
						We recognize the importance of responsible water management and the need to address the potential implications of this increasing trend. It is essential for us to monitor and manage our water usage efficiently, minimize waste, and explore opportunities to improve water conservation practices across our operations.
						While growth presents challenges in terms of water resource management, we are committed to implementing sustainable solutions. We aim to adopt technologies, processes, and practices that promote water efficiency, reuse, and recycling. By integrating responsible water management into our growth strategy, we can work towards minimizing our impact on water resources and mitigating potential risks associated with increased withdrawals, consumption, and discharges.
						Furthermore, as part of our long-term planning, we understand the importance of considering the availability and sustainability of water resources in the regions where we operate. By engaging in dialogue with local communities, stakeholders, and relevant authorities, we aim to develop collaborative approaches that ensure responsible water use while supporting the growth and development of our business.
Total consumption – midstream/downstream	92453.25	Higher	Increase/decrease in business activity	About the same	Increase/decrease in business activity	As Doğan Holding, we have experienced a substantial increase in our business activities, both in terms of revenue generated and the scale of our operations. This growth has led to a corresponding increase in our water withdrawals, consumption, and discharges. As our operations expand to meet market demands and seize new opportunities, the demand for water to support various processes and activities has naturally escalated.
						With our business activities continuing to grow, it is foreseeable that the trend of increased water withdrawals, consumption, and discharges will persist. As we strive to meet the needs of our expanding operations, such as manufacturing, energy production, and other essential activities, the demand for water resources becomes even more crucial.
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						While growth presents challenges in terms of water resource management, we are committed to implementing sustainable solutions. We aim to adopt technologies, processes, and practices that promote water efficiency, reuse, and recycling. By integrating responsible water management into our growth strategy, we can work towards minimizing our impact on water resources and mitigating potential risks associated with increased withdrawals, consumption, and discharges.
						Furthermore, as part of our long-term planning, we understand the importance of considering the availability and sustainability of water resources in the regions where we operate. By engaging in dialogue with local communities, stakeholders, and relevant authorities, we aim to develop collaborative approaches that ensure responsible water use while supporting the growth and development of our business.

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	Volume (megaliters/year)		Primary reason for comparison with previous reporting year		Primary reason for forecast	Please explain
Total withdrawals – chemicals	<not applicable=""></not>	<not Applicable></not 	<not applicable=""></not>	<not Applicab le></not 	<not applicable=""></not>	<not applicable=""></not>
Total discharges – chemicals	<not applicable=""></not>	<not Applicable></not 	<not applicable=""></not>	<not Applicab le></not 	<not applicable=""></not>	<not applicable=""></not>
Total consumption – chemicals	<not applicable=""></not>	<not Applicable></not 	<not applicable=""></not>	<not Applicab le></not 	<not applicable=""></not>	<not applicable=""></not>
Total withdrawals – other business division	<not applicable=""></not>	<not Applicable></not 	<not applicable=""></not>	<not Applicab le></not 	<not applicable=""></not>	<not applicable=""></not>
Total discharges – other business division	<not applicable=""></not>	<not Applicable></not 	<not applicable=""></not>	<not Applicab le></not 	<not applicable=""></not>	<not applicable=""></not>
Total consumption – other business division	<not applicable=""></not>	<not Applicable></not 	<not applicable=""></not>	<not Applicab le></not 	<not applicable=""></not>	<not applicable=""></not>

W1.2d

(W1.2d) Indicate whether water is withdrawn from areas with water stress, provide the proportion, how it compares with the previous reporting year, and how it is forecasted to change.

	areas with water stress	withdrawn from areas with water	with previous	for comparison	Five- year forecast	Primary reason for forecast	Identification tool	Please explain
Row 1	No	<not Applicable ></not 	<not Applicable></not 	<not applicable=""></not>		<not Applicab le></not 	WRI Aqueduct WWF Water Risk Filter	As Doğan Holding, we are mindful of the locations where our facilities are primarily situated, with a significant presence around Istanbul and İzmir. It is worth noting that these areas are not considered water-stressed regions. Consequently, we do not engage in water withdrawals from water-stressed areas for our operations. By operating in regions that are not classified as water-stressed, we can ensure that our activities do not exert additional pressure on areas facing water scarcity or stress. We recognize the importance of responsible water sourcing and strive to align our operations with sustainable water management practices. While we acknowledge that water scarcity is a global concern, our geographic presence in regions with sufficient water resources allows us to focus on other aspects of responsible water management, such as efficient water usage, conservation, and wastewater treatment. By proactively managing water resources in areas where we operate, we aim to minimize our environmental impact and contribute to the overall sustainability of these regions. It is important to note that our commitment to responsible water management extends beyond the absence of water withdrawals from water-stressed areas. We understand that water is a precious resource, and regardless of the local context, we strive to adopt sustainable practices, monitor our water usage, and continuously seek opportunities to improve our water efficiency and conservation efforts. As Doğan Holding, we remain dedicated to sustainable business practices and responsible water management, ensuring that our operations contribute positively to the preservation and responsible use of water resources. We continuously monitor the evolving water landscape and adapt our practices accordingly, taking into account local water conditions and collaborating with stakeholders to address emerging challenges.

W1.2h

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	Relevance	Volume (megaliters/year)	Comparison with previous reporting year	Primary reason for comparison with previous reporting year	Please explain
Fresh surface water, including rainwater, water from wetlands, rivers, and lakes	Not relevant	<not applicable=""></not>	<not Applicable></not 	<not applicable=""></not>	Doğan Holding utilizes a withdrawal method to source the water it uses in its operations directly from the water grids. This means that the company relies on the centralized water supply infrastructure provided by local water utilities or water management authorities.
					By sourcing water from the grid, Doğan Holding benefits from a centralized and regulated water supply. The grid ensures a reliable and consistent water source, providing the company with the necessary volume of water required for its operations. It also allows for easy access to water without the need for extensive on-site extraction or storage infrastructure.
					In summary, Doğan Holding's withdrawal method involves sourcing water directly from the water grids provided by local water utilities. This method ensures reliable access to water, compliance with regulations, efficient water management, and reduced impact on local water sources.
Brackish surface water/Seawater	Not relevant	<not applicable=""></not>	<not Applicable></not 	<not applicable=""></not>	Doğan Holding utilizes a withdrawal method to source the water it uses in its operations directly from the water grids. This means that the company relies on the centralized water supply infrastructure provided by local water utilities or water management authorities.
					By sourcing water from the grid, Doğan Holding benefits from a centralized and regulated water supply. The grid ensures a reliable and consistent water source, providing the company with the necessary volume of water required for its operations. It also allows for easy access to water without the need for extensive on-site extraction or storage infrastructure.
					In summary, Doğan Holding's withdrawal method involves sourcing water directly from the water grids provided by local water utilities. This method ensures reliable access to water, compliance with regulations, efficient water management, and reduced impact on local water sources.
Groundwater – renewable	Not relevant	<not applicable=""></not>	<not Applicable></not 	<not applicable=""></not>	Doğan Holding utilizes a withdrawal method to source the water it uses in its operations directly from the water grids. This means that the company relies on the centralized water supply infrastructure provided by local water utilities or water management authorities.
					by sourcing water from the grid, Doğan Holding benefits from a centralized and regulated water supply. The grid ensures a reliable and consistent water source, providing the company with the necessary volume of water required for its operations. It also allows for easy access to water without the need for extensive on-site extraction or storage infrastructure.
					In summary, Doğan Holding's withdrawal method involves sourcing water directly from the water grids provided by local water utilities. This method ensures reliable access to water, compliance with regulations, efficient water management, and reduced impact on local water sources.
Groundwater – non- renewable	Not relevant	<not applicable=""></not>	<not Applicable></not 	<not applicable=""></not>	Doğan Holding utilizes a withdrawal method to source the water it uses in its operations directly from the water grids. This means that the company relies on the centralized water supply infrastructure provided by local water utilities or water management authorities.
					By sourcing water from the grid, Doğan Holding benefits from a centralized and regulated water supply. The grid ensures a reliable and consistent water source, providing the company with the necessary volume of water required for its operations. It also allows for easy access to water without the need for extensive on-site extraction or storage infrastructure.
					In summary, Doğan Holding's withdrawal method involves sourcing water directly from the water grids provided by local water utilities. This method ensures reliable access to water, compliance with regulations, efficient water management, and reduced impact on local water sources.
Produced/Entrained water	Not relevant	<not applicable=""></not>	<not Applicable></not 	<not applicable=""></not>	Doğan Holding utilizes a withdrawal method to source the water it uses in its operations directly from the water grids. This means that the company relies on the centralized water supply infrastructure provided by local water utilities or water management authorities.
					By sourcing water from the grid, Doğan Holding benefits from a centralized and regulated water supply. The grid ensures a reliable and consistent water source, providing the company with the necessary volume of water required for its operations. It also allows for easy access to water without the need for extensive on-site extraction or storage infrastructure.
					In summary, Doğan Holding's withdrawal method involves sourcing water directly from the water grids provided by local water utilities. This method ensures reliable access to water, compliance with regulations, efficient water management, and reduced impact on local water sources.
Third party sources	Relevant	220.65	Higher	Increase/decrease in business activity	Doğan Holding utilizes a withdrawal method to source the water it uses in its operations directly from the water grids. This means that the company relies on the centralized water supply infrastructure provided by local water utilities or water management authorities.
					By sourcing water from the grid, Doğan Holding benefits from a centralized and regulated water supply. The grid ensures a reliable and consistent water source, providing the company with the necessary volume of water required for its operations. It also allows for easy access to water without the need for extensive on-site extraction or storage infrastructure.
					In summary, Doğan Holding's withdrawal method involves sourcing water directly from the water grids provided by local water utilities. This method ensures reliable access to water, compliance with regulations, efficient water management, and reduced impact on local water sources.

W1.2i

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(W1.2i) Provide total water discharge data by destination.

	Relevance	Volume (megaliters/year)	Comparison with previous reporting year	Primary reason for comparison with previous reporting year	Please explain
Fresh surface water	Not relevant	<not applicable=""></not>	<not Applicable></not 	<not applicable=""></not>	Doğan Holding employs the method of discharging water to grids as a means to manage the water it does not consume in its operations. When water is not utilized within the company's facilities or processes, it is directed towards the local water grid or wastewater management system. By connecting to the grid infrastructure, Doğan Holding ensures that the unused water is properly treated and managed in accordance with environmental regulations.
					Discharging water to grids allows Doğan Holding to participate in the centralized wastewater treatment process, where the water undergoes treatment and purification before being released back into the natural environment or repurposed for various applications like irrigation or industrial processes. By adhering to this method, Doğan Holding contributes to sustainable water management practices and minimizes the direct impact on local water bodies.
Brackish surface water/seawater	Not relevant	<not applicable=""></not>	<not Applicable></not 	<not applicable=""></not>	Doğan Holding employs the method of discharging water to grids as a means to manage the water it does not consume in its operations. When water is not utilized within the company's facilities or processes, it is directed towards the local water grid or wastewater management system. By connecting to the grid infrastructure, Doğan Holding ensures that the unused water is properly treated and managed in accordance with environmental regulations. Discharging water to grids allows Doğan Holding to participate in the centralized wastewater treatment process, where the water
					undergoes treatment and purification before being released back into the natural environment or repurposed for various applications like irrigation or industrial processes. By adhering to this method, Doğan Holding contributes to sustainable water management practices and minimizes the direct impact on local water bodies.
Groundwater	Not relevant	<not applicable=""></not>	<not Applicable></not 	<not applicable=""></not>	Doğan Holding employs the method of discharging water to grids as a means to manage the water it does not consume in its operations. When water is not utilized within the company's facilities or processes, it is directed towards the local water grid or wastewater management system. By connecting to the grid infrastructure, Doğan Holding ensures that the unused water is properly treated and managed in accordance with environmental regulations.
					Discharging water to grids allows Doğan Holding to participate in the centralized wastewater treatment process, where the water undergoes treatment and purification before being released back into the natural environment or repurposed for various applications like irrigation or industrial processes. By adhering to this method, Doğan Holding contributes to sustainable water management practices and minimizes the direct impact on local water bodies.
Third-party destinations	Relevant	18.81	Higher	Increase/decrease in business activity	Doğan Holding employs the method of discharging water to grids as a means to manage the water it does not consume in its operations. When water is not utilized within the company's facilities or processes, it is directed towards the local water grid or wastewater management system. By connecting to the grid infrastructure, Doğan Holding ensures that the unused water is properly treated and managed in accordance with environmental regulations.
					Discharging water to grids allows Doğan Holding to participate in the centralized wastewater treatment process, where the water undergoes treatment and purification before being released back into the natural environment or repurposed for various applications like irrigation or industrial processes. By adhering to this method, Doğan Holding contributes to sustainable water management practices and minimizes the direct impact on local water bodies.

W1.2j

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	Relevance of treatment level to	Volume (megaliters/year)	Comparison of treated volume with previous	Primary reason for comparison with previous reporting year	% of your sites/facilities/operations this volume applies to	Please explain
	discharge		reporting year			
Tertiary treatment	Not relevant	<not applicable=""></not>	<not Applicable></not 	<not applicable=""></not>	<not applicable=""></not>	Doğan Holding employs the method of discharging water to grids as a means to manage the water it does not consume in its operations. When water is not utilized within the company's facilities or processes, it is directed towards the local water grid or wastewater management system. By connecting to the grid infrastructure, Doğan Holding ensures that the unused water is properly treated and managed in accordance with environmental regulations. Discharging water to grids allows Doğan Holding to participate in the centralized wastewater treatment process, where the water undergoes treatment and purification before being released back into the natural environment or repurposed for various applications like irrigation or industrial processes. By adhering to this method, Doğan Holding contributes to sustainable water management
						practices and minimizes the direct impact on local water bodies.
Secondary treatment	Not relevant	<not applicable=""></not>	<not Applicable></not 	<not applicable=""></not>	<not applicable=""></not>	Doğan Holding employs the method of discharging water to grids as a means to manage the water it does not consume in its operations. When water is not utilized within the company's facilities or processes, it is directed towards the local water grid or wastewater management system. By connecting to the grid infrastructure, Doğan Holding ensures that the unused water is properly treated and managed in accordance with environmental regulations. Discharging water to grids allows Doğan Holding to participate in the centralized wastewater treatment process, where the water undergoes treatment and purification before being released back into the natural environment or repurposed for various applications like irrigation or industrial processes. By adhering to this method, Doğan Holding contributes to sustainable water management practices and minimizes the direct impact on local water bodies.
Primary	Not	<not applicable=""></not>	<not< td=""><td><not applicable=""></not></td><td><not applicable=""></not></td><td>Doğan Holding employs the method of discharging water to grids as a means to manage the water it</td></not<>	<not applicable=""></not>	<not applicable=""></not>	Doğan Holding employs the method of discharging water to grids as a means to manage the water it
treatment	relevant	CNOT Applicable	Applicable>	(Not Applicable)	Citot Applicables	does not consume in its operations. When water is not utilized within the company's facilities or processes, it is directed towards the local water grid or wastewater management system. By connecting to the grid infrastructure, Doğan Holding ensures that the unused water is properly treated and managed in accordance with environmental regulations.
						Discharging water to grids allows Doğan Holding to participate in the centralized wastewater treatment process, where the water undergoes treatment and purification before being released back into the natural environment or repurposed for various applications like irrigation or industrial processes. By adhering to this method, Doğan Holding contributes to sustainable water management practices and minimizes the direct impact on local water bodies.
Discharge to the natural environment without treatment	Not relevant	<not applicable=""></not>	<not Applicable></not 	<not applicable=""></not>	<not applicable=""></not>	Doğan Holding employs the method of discharging water to grids as a means to manage the water it does not consume in its operations. When water is not utilized within the company's facilities or processes, it is directed towards the local water grid or wastewater management system. By connecting to the grid infrastructure, Doğan Holding ensures that the unused water is properly treated and managed in accordance with environmental regulations.
						Discharging water to grids allows Doğan Holding to participate in the centralized wastewater treatment process, where the water undergoes treatment and purification before being released back into the natural environment or repurposed for various applications like irrigation or industrial processes. By adhering to this method, Doğan Holding contributes to sustainable water management practices and minimizes the direct impact on local water bodies.
Discharge to a third party without treatment	Relevant	18.81	Higher	Increase/decrease in business activity	100%	Doğan Holding employs the method of discharging water to grids as a means to manage the water it does not consume in its operations. When water is not utilized within the company's facilities or processes, it is directed towards the local water grid or wastewater management system. By connecting to the grid infrastructure, Doğan Holding ensures that the unused water is properly treated and managed in accordance with environmental regulations.
						Discharging water to grids allows Doğan Holding to participate in the centralized wastewater treatment process, where the water undergoes treatment and purification before being released back into the natural environment or repurposed for various applications like irrigation or industrial processes. By adhering to this method, Doğan Holding contributes to sustainable water management practices and minimizes the direct impact on local water bodies.
Other	Not relevant	<not applicable=""></not>	<not Applicable></not 	<not applicable=""></not>	<not applicable=""></not>	Doğan Holding employs the method of discharging water to grids as a means to manage the water it does not consume in its operations. When water is not utilized within the company's facilities or processes, it is directed towards the local water grid or wastewater management system. By connecting to the grid infrastructure, Doğan Holding ensures that the unused water is properly treated and managed in accordance with environmental regulations.
						Discharging water to grids allows Doğan Holding to participate in the centralized wastewater treatment process, where the water undergoes treatment and purification before being released back into the natural environment or repurposed for various applications like irrigation or industrial processes. By adhering to this method, Doğan Holding contributes to sustainable water management practices and minimizes the direct impact on local water bodies.

W1.2k

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(W1.2k) Provide details of your organization's emissions of nitrates, phosphates, pesticides, and other priority substances to water in the reporting year.

	water in the reporting year	Category(ies) of substances included	List the specific substances included	Please explain
Row 1	0	Nitrates Phosphates Pesticides	Applicable>	Doğan Holding is committed to addressing its environmental impact, including the emissions of nitrates, phosphates, pesticides, and other priority substances to water. While the company is in the process of determining the extent of these emissions, they are actively working to find suitable methods for their measurement and monitoring.
				To achieve this, Doğan Holding is actively researching and exploring various methods and technologies for measuring and monitoring these emissions. This includes collaborating with scientific experts, partnering with specialized organizations, and staying informed about advancements in environmental monitoring practices. By leveraging innovative approaches and technologies, the company aims to develop reliable and accurate methods to assess and manage these priority substances' presence in water sources.
				It's worth noting that the process of determining emissions of nitrates, phosphates, pesticides, and other priority substances to water requires careful evaluation and adherence to scientific methodologies. As Doğan Holding progresses in this endeavor, they will be better equipped to assess their environmental performance, set targets for improvement, and implement strategies that ensure the responsible use and protection of water resources.

W1.3

(W1.3) Provide a figure for your organization's total water withdrawal efficiency.

	Revenue	Total water	Total	Anticipated forward trend
		withdrawal	water	
		volume	withdrawal	
		(megaliters)	efficiency	
Row	3913289	220.65	177352805	Considering our anticipated forward trend in business growth, we expect an upward trajectory in our business operations. This growth may potentially lead to increased
1	6430		.030591	water usage numbers as our business activities expand to meet market demands. Hence, we aim to adopt sustainable practices that minimize our water consumption
				per unit of output. Importantly, if our revenue keeps increasing at a faster pace than our water usage numbers, our water efficiency will improve.

W-OG1.3

(W-OG1.3) Do you calculate water intensity for your activities associated with the oil & gas sector?

No, but we intend to do so within the next two years

W1.4

(W1.4) Do any of your products contain substances classified as hazardous by a regulatory authority?

	Products contain hazardous substances	Comment
Row 1	No	

W1.5

(W1.5) Do you engage with your value chain on water-related issues?

	Engagement	Primary reason for no engagement	Please explain
Suppliers	No	We are planning to do so within the next two years	Doğan Holding is in its early stages of developing its water management practices, which includes engaging with its suppliers regarding water-related issues. Recognizing the importance of supply chain collaboration and the role of suppliers in water stewardship, the company is actively working towards establishing relationships and initiating dialogues with its suppliers to address water-related concerns.
			Engaging with suppliers on water-related issues is a critical step for Doğan Holding to promote sustainable water management throughout its value chain. By involving suppliers in the conversation, the company aims to raise awareness about the importance of water conservation, efficient water usage, and responsible wastewater management. This engagement provides an opportunity to exchange knowledge, share best practices, and collaborate on implementing measures that contribute to sustainable water practices across the supply chain.
			Engaging with suppliers also opens avenues for exploring joint initiatives and partnerships focused on water conservation and responsible water use. This can involve sharing resources, knowledge, and experiences to collectively address water-related challenges and foster innovation in water management practices. By collaborating with suppliers, Doğan Holding can leverage collective efforts to make a meaningful and positive impact on water stewardship within its supply chain.
Other value chain partners (e.g.,	No	, ,	Doğan Holding recognizes the importance of collaborating with other partners in its value chain regarding water-related issues. This includes engaging with customers, distributors, contractors, and other stakeholders to address water management challenges collectively. By actively involving these partners, Doğan Holding aims to promote a shared understanding of the importance of sustainable water practices and foster a culture of responsible water stewardship.
customers)		,	Engagement with other stakeholders such as industry associations, NGOs, and local communities is crucial for Doğan Holding's holistic approach to water management. These collaborations can foster knowledge sharing, advocacy for sustainable water practices, and the implementation of collective initiatives aimed at addressing water-related challenges on a broader scale. By working together with these stakeholders, Doğan Holding can drive positive change, influence industry norms, and contribute to the broader goal of sustainable water management.
			As Doğan Holding continues to develop its water management practices, engaging with other partners in the value chain will be instrumental in driving a comprehensive and integrated approach to water stewardship. Through these partnerships, the company can leverage collective efforts, share expertise, and promote a sustainable and responsible use of water throughout the value chain.

W2. Business impacts

W2.1

(W2.1) Has your organization experienced any detrimental water-related impacts?

No

W2.2

(W2.2) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for water-related regulatory violations?

	Water-related regulatory violations	Fines, enforcement orders, and/or other penalties	Comment
Row 1	No	<not applicable=""></not>	

W3. Procedures

W3.1

(W3.1) Does your organization identify and classify potential water pollutants associated with its activities that could have a detrimental impact on water ecosystems or human health?

classification of potential water	How potential water pollutants are identified and classified	Please explain
No, we do not identify and classify our potential water pollutants	<not applicable=""></not>	Doğan Holding recognizes the importance of identifying and classifying potential water pollutants associated with our activities, considering their potential impact on water ecosystems and human health. Currently, we are in the process of enhancing our water management practices, and one of our upcoming priorities is to identify and assess these pollutants systematically.
		While we are yet to identify and classify such pollutants, we adhere to the regulations and guidelines set forth by relevant authorities. By complying with these regulations, we aim to minimize any potential negative effects on water quality and ecosystems. Our commitment to adhering to these standards demonstrates our responsible approach to water management and our dedication to environmental stewardship.

W3.3

(W3.3) Does your organization undertake a water-related risk assessment?

No, water risks-related are not assessed

W3.3c

(W3.3c) Why does your organization not undertake a water-related risk assessment?

	Primary reason	Please explain
1	'	The company is actively working towards realizing and integrating water-related risks into its overall risk management process. Recognizing the significance of water as a critical resource and the potential risks associated with its scarcity, quality, and regulatory changes, Doğan Holding aims to assess and address these risks to ensure sustainable operations and long-term resilience.
		Realizing water-related risks will enable Doğan Holding to engage in targeted water conservation and efficiency initiatives. By understanding the potential impacts on water availability and quality, the company can implement measures to optimize water usage, reduce waste, and improve overall water management practices. These actions can contribute to resource efficiency, cost savings, and sustainable growth.

W4. Risks and opportunities

W4.1

(W4.1) Have you identified any inherent water-related risks with the potential to have a substantive financial or strategic impact on your business?

No

(W4.1a) 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.

W4.2b

(W4.2b) Why does your organization not consider itself exposed to water risks in its direct operations with the potential to have a substantive financial or strategic impact?

	Primary	Please explain
	reason	
Rov	Evaluation	The company is actively working towards realizing and integrating water-related risks into its overall risk management process. Recognizing the significance of water as a critical resource and the
1	in	potential risks associated with its scarcity, quality, and regulatory changes, Doğan Holding aims to assess and address these risks to ensure sustainable operations and long-term resilience.
	progress	
		Realizing water-related risks will enable Doğan Holding to engage in targeted water conservation and efficiency initiatives. By understanding the potential impacts on water availability and quality,
		the company can implement measures to optimize water usage, reduce waste, and improve overall water management practices. These actions can contribute to resource efficiency, cost
		savings, and sustainable growth.

W4.2c

(W4.2c) Why does your organization not consider itself exposed to water risks in its value chain (beyond direct operations) with the potential to have a substantive financial or strategic impact?

	Primary reason	Please explain
Row 1		The company is actively working towards realizing and integrating water-related risks into its overall risk management process. Recognizing the significance of water as a critical resource and the potential risks associated with its scarcity, quality, and regulatory changes, Doğan Holding aims to assess and address these risks to ensure sustainable operations and long-term resilience.
		Realizing water-related risks will enable Doğan Holding to engage in targeted water conservation and efficiency initiatives. By understanding the potential impacts on water availability and quality, the company can implement measures to optimize water usage, reduce waste, and improve overall water management practices. These actions can contribute to resource efficiency, cost savings, and sustainable growth.

W4.3

(W4.3) Have you identified any water-related opportunities with the potential to have a substantive financial or strategic impact on your business? Yes, we have identified opportunities but are unable to realize them

W4.3b

(W4.3b) Why does your organization not consider itself to have water-related opportunities?

	Primary reason	Please explain
Row 1	V Evaluation in progress	The company is actively working towards realizing and integrating water-related opportunities into its risk management process. Recognizing that sustainable water practices can present opportunities for innovation, cost savings, and competitive advantage, Doğan Holding aims to identify and capitalize on these opportunities to enhance its business operations. In the process of integrating water-related opportunities into its risk management process, Doğan Holding is exploring various avenues to optimize water usage, improve water efficiency, and promote responsible water stewardship. This involves evaluating technologies, best practices, and industry benchmarks to identify areas where the company can make strategic investments and improvements. One of the key opportunities lies in water conservation and efficiency measures. By adopting advanced water management technologies and practices, Doğan Holding can reduce water consumption, minimize waste, and enhance operational efficiency. These measures can not only contribute to environmental sustainability but also result in significant cost savings through reduced water-related expenses.
		Additionally, responsible water management practices can enhance Doğan Holding's reputation and stakeholder relationships. The company can showcase its commitment to sustainable water practices, which is increasingly valued by customers, investors, and the broader public. By transparently communicating their efforts and achievements in water management, Doğan Holding can differentiate itself as a responsible and environmentally conscious organization, thereby strengthening its brand image and market position. Furthermore, realizing water-related opportunities can open doors for innovation and diversification. Doğan Holding can explore new business models, technologies, and partnerships related to water efficiency, water treatment, or sustainable water solutions. By actively seeking collaborations with industry experts, research institutions, or startups, the company can tap into emerging trends and drive innovation in water-related practices, creating potential new revenue streams and expanding its market reach.

W6. Governance

W6.1

(W6.1) Does your organization have a water policy?

No, but we plan to develop one within the next 2 years

W6.2

(W6.2) Is there board level oversight of water-related issues within your organization?

Yes

W6.2a

(W6.2a) Identify the position(s) (do not include any names) of the individual(s) on the board with responsibility for water-related issues.

Position of individual or committee	Responsibilities for water-related issues
Board Chair	Climate-related issues are governed by the highest level of ownership at Doğan Holding by the Board Chair. The Sustainability Committee, operating under the Board of Directors, is the authority responsible for sustainability and climate-related issues which also include water-related issues per our definition. Our Board Chair monitors the progress of our Sustainability Committee closely. With the leadership of our Board Chair, the 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 is among the other members of the board who has direct responsibility for sustainability & climate-related issues which also include water-related issues per our definition 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 the board is responsible for sustainability and climate-related issues which also include water-related issues per our definition 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.
Board-level committee	The work, performance, and practices of Doğan Holding within the scope of sustainability priorities are managed at the highest level by the Board of Directors, in accordance with the overarching Doğan Holding Sustainability Policy. As part of our efforts to effectively manage and promote our sustainability approach and practices throughout the Doğan Group, the Doğan Holding Sustainability Committee commenced its activities in 2022. The Sustainability Committee operates under the oversight of the Board of Directors with the aim of defining the Holding's sustainability strategy in the environmental, social, and corporate governance domains, ensuring coordination among Group companies, and implementing, monitoring, and auditing sustainability policies, targets, and practices in these areas.

W6.2b

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(W6.2b) Provide further details on the board's oversight of water-related issues.

		Governance mechanisms into which water-related issues are integrated	Please explain
Row 1	Scheduled - all meetings	and divestitures	

W6.2d

(W6.2d) Does your organization have at least one board member with competence on water-related issues?

	Board member(s) have competence on water-related issues		no board-level competence on	Explain why your organization does not have at least one board member with competence on water-related issues and any plans to address board-level competence in the future
Row 1		An independent director on the 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 sustainability and climate-related issues as well as water-related issues per our definition from a global perspective.	<not applicable=""></not>	<not applicable=""></not>

W6.3

(W6.3) Provide the highest management-level position(s) or committee(s) with responsibility for water-related issues (do not include the names of individuals).

Name of the position(s) and/or committee(s)

Sustainability committee

Water-related responsibilities of this position

Assessing water-related risks and opportunities

Managing water-related risks and opportunities

Setting water-related corporate targets

Monitoring progress against water-related corporate targets

Integrating water-related issues into business strategy

Frequency of reporting to the board on water-related issues

Quarterly

Please explain

The work, performance, and practices of Doğan Holding within the scope of sustainability priorities are managed at the highest level by the Board of Directors, in accordance with the overarching Doğan Holding Sustainability Policy. As part of our efforts to effectively manage and promote our sustainability approach and practices throughout the Doğan Group, the Doğan Holding Sustainability Committee commenced its activities in 2022. The Sustainability Committee operates under the oversight of the Board of Directors with the aim of defining the Holding's sustainability strategy in the environmental, social, and corporate governance domains, ensuring coordination among Group companies, and implementing, monitoring, and auditing sustainability policies, targets, and practices in these areas.

W6.4

(W6.4) Do you provide incentives to C-suite employees or board members for the management of water-related issues?

	Provide incentives for management of water-related issues	Comment
Row 1	No, not currently but we plan to introduce them in the next two years	

W6.5

(W6.5) Do you engage in activities that could either directly or indirectly influence public policy on water through any of the following?

No

W6.6

No, but we plan to do so in the next two years

W7. Business strategy

W7.1

(W7.1) Are water-related issues integrated into any aspects of your long-term strategic business plan, and if so how?

	Are water-related issues integrated?	Long- term time horizon (years)	
Long-term business objectives	No, water-related issues not yet reviewed, but there are plans to do so in the next two years	<not Applica ble></not 	Doğan Holding recognizes the importance of integrating water-related issues into its long-term strategic business plan. Although water-related issues are not currently integrated into aspects such as long-term business objectives, strategy for achieving long-term objectives, and financial planning, the company is actively planning to address this gap in the coming years. By incorporating water-related considerations into these critical aspects of the business plan, Doğan Holding aims to enhance its sustainability, resilience, and long-term value creation.
			In the next couple of years, Doğan Holding is committed to developing a strategy that encompasses water-related issues within its long-term business objectives. This involves setting clear targets, benchmarks, and key performance indicators related to water management and sustainability.
			Doğan Holding recognizes the significance of financial planning in supporting its water management initiatives. The company is actively planning to integrate water-related factors into its financial planning processes, ensuring that adequate resources are allocated for water-related projects, technologies, and infrastructure. By incorporating the financial implications of water management into its budgeting, forecasting, and investment decision-making, Doğan Holding aims to strengthen the financial viability of its water-related initiatives and enhance their overall effectiveness.
Strategy for achieving long-term objectives	No, water-related issues not yet reviewed, but there are plans to do so in the next two years	<not Applica ble></not 	Doğan Holding recognizes the importance of integrating water-related issues into its long-term strategic business plan. Although water-related issues are not currently integrated into aspects such as long-term business objectives, strategy for achieving long-term objectives, and financial planning, the company is actively planning to address this gap in the coming years. By incorporating water-related considerations into these critical aspects of the business plan, Doğan Holding aims to enhance its sustainability, resilience, and long-term value creation.
,			In the next couple of years, Doğan Holding is committed to developing a strategy that encompasses water-related issues within its long-term business objectives. This involves setting clear targets, benchmarks, and key performance indicators related to water management and sustainability.
			Doğan Holding recognizes the significance of financial planning in supporting its water management initiatives. The company is actively planning to integrate water-related factors into its financial planning processes, ensuring that adequate resources are allocated for water-related projects, technologies, and infrastructure. By incorporating the financial implications of water management into its budgeting, forecasting, and investment decision-making, Doğan Holding aims to strengthen the financial viability of its water-related initiatives and enhance their overall effectiveness.
Financial planning	No, water-related issues not yet reviewed, but there are plans to do so in the next two years	<not Applica ble></not 	Doğan Holding recognizes the importance of integrating water-related issues into its long-term strategic business plan. Although water-related issues are not currently integrated into aspects such as long-term business objectives, strategy for achieving long-term objectives, and financial planning, the company is actively planning to address this gap in the coming years. By incorporating water-related considerations into these critical aspects of the business plan, Doğan Holding aims to enhance its sustainability, resilience, and long-term value creation.
			In the next couple of years, Doğan Holding is committed to developing a strategy that encompasses water-related issues within its long-term business objectives. This involves setting clear targets, benchmarks, and key performance indicators related to water management and sustainability.
			Doğan Holding recognizes the significance of financial planning in supporting its water management initiatives. The company is actively planning to integrate water-related factors into its financial planning processes, ensuring that adequate resources are allocated for water-related projects, technologies, and infrastructure. By incorporating the financial implications of water management into its budgeting, forecasting, and investment decision-making, Doğan Holding aims to strengthen the financial viability of its water-related initiatives and enhance their overall effectiveness.

W7.2

(W7.2) What is the trend in your organization's water-related capital expenditure (CAPEX) and operating expenditure (OPEX) for the reporting year, and the anticipated trend for the next reporting year?

Row 1

Water-related CAPEX (+/- % change)

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

Water-related OPEX (+/- % change)

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

Please explain

W7.3

(W7.3) Does your organization use scenario analysis to inform its business strategy?

	Use of scenario analysis	Comment
Row 1	No, but we anticipate doing so within the next two years	

(W7.4) Does your company use an internal price on water?

Row 1

Does your company use an internal price on water?

No, but we are currently exploring water valuation practices

Please explain

Doğan Holding, although not currently using an internal price on water, recognizes the importance of valuing water as a strategic resource. The company is actively evaluating different valuation prices for water and considering the potential benefits and implications of integrating such a pricing mechanism into its business operations. By doing so, Doğan Holding aims to enhance its understanding of the value of water, promote responsible water management practices, and potentially drive more efficient and sustainable water usage throughout its operations.

W7.5

(W7.5) Do you classify any of your current products and/or services as low water impact?

	classified as low	used to classify low	Primary reason for not classifying any of your current products and/or services as low water impact	Please explain
Row 1	No, but we plan to address this within the next two years		Important but not an immediate business priority	Doğan Holding acknowledges that we are yet to classify any of our current products and/or services as having a low water impact. However, we are committed to continuously improving our understanding and management of water-related aspects throughout our operations.
				While we may not have explicitly classified our products and services as low water impact at this stage, we are actively working towards achieving this goal in the future. As part of our commitment to sustainable practices, we are dedicated to assessing the water footprint of our offerings, identifying areas where water usage can be minimized, and exploring innovative approaches to reduce water impact across our value chain.

W8. Targets

W8.1

(W8.1) Do you have any water-related targets?

Yes

W8.1a

(W8.1a) Indicate whether you have targets relating to water pollution, water withdrawals, WASH, or other water-related categories.

	Target set in this category	Please explain
Water pollution	No, but we plan to within the next two years	Doğan Holding recognizes the importance of addressing various water-related aspects beyond its water replenishment target. The company intends to implement additional targets concerning water pollution, water withdrawals, and Water, Sanitation, and Hygiene (WASH) services. However, Doğan Holding acknowledges the need to establish strong water management processes within the company as a prerequisite for effectively addressing these areas. Before implementing specific targets in these areas, Doğan Holding will engage in thorough assessments and analyses to understand the current state of its water-related practices. This includes evaluating potential sources of water pollution, assessing water withdrawal patterns, and examining the provision of WASH services within its operations.
Water withdrawals	to within	Doğan Holding recognizes the importance of addressing various water-related aspects beyond its water replenishment target. The company intends to implement additional targets concerning water pollution, water withdrawals, and Water, Sanitation, and Hygiene (WASH) services. However, Doğan Holding acknowledges the need to establish strong water management processes within the company as a prerequisite for effectively addressing these areas. Before implementing specific targets in these areas, Doğan Holding will engage in thorough assessments and analyses to understand the current state of its water-related practices. This includes evaluating potential sources of water pollution, assessing water withdrawal patterns, and examining the provision of WASH services within its operations.
Water, Sanitation, and Hygiene (WASH) services	No, but we plan to within the next two years	Doğan Holding recognizes the importance of addressing various water-related aspects beyond its water replenishment target. The company intends to implement additional targets concerning water pollution, water withdrawals, and Water, Sanitation, and Hygiene (WASH) services. However, Doğan Holding acknowledges the need to establish strong water management processes within the company as a prerequisite for effectively addressing these areas. Before implementing specific targets in these areas, Doğan Holding will engage in thorough assessments and analyses to understand the current state of its water-related practices. This includes evaluating potential sources of water pollution, assessing water withdrawal patterns, and examining the provision of WASH services within its operations.
Other	Yes	<not applicable=""></not>

W8.1b

(W8.1b) Provide details of your water-related targets and the progress made.

Target reference number

Target 1

Category of target

Water recycling/reuse

Target coverage

Company-wide (direct operations only)

Quantitative metric

Other, please specify (Replenish consumed water)

Year target was set

2022

Base year

2022

Base year figure

Ω

Target year

2030

Target year figure

220655

Reporting year figure

0

% of target achieved relative to base year

0

Target status in reporting year

Underway

Please explain

Doğan Holding has set a target of replenishing all the water it consumes back to nature by the year 2030. By aiming to replenish all the water it consumes, Doğan Holding is demonstrating its dedication to reducing its water footprint and mitigating the potential impacts of its operations on water availability and quality. This target goes beyond mere water conservation efforts and highlights the company's proactive approach to responsible water stewardship. To achieve this target, Doğan Holding will be implementing a comprehensive water replenishment strategy that involves various measures including investing in water conservation technologies, optimizing water usage across its operations, implementing efficient water treatment and recycling systems, and supporting ecosystem restoration projects that enhance natural water sources. Replenishing consumed water back to nature signifies Doğan Holding's commitment to giving back to the environment and contributing to the sustainable balance of water resources. By implementing water replenishment initiatives, the company can play a vital role in replenishing aquifers, restoring water ecosystems, and supporting the overall health and resilience of natural water systems.

W9. Verification

W9.1

(W9.1) Do you verify any other water information reported in your CDP disclosure (not already covered by W5.1a)?

Yes

W9.1a

(W9.1a) Which data points within your CDP disclosure have been verified, and which standards were used?

Disclosure module	Data verified	Verification standard	Please explain
W1 Current state	W1. Current State water usage data	ISAE 3000	W1. Current State water usage data has been verified by a third-party organization.

W10. Plastics

W10.1

(W10.1) Have you mapped where in your value chain plastics are used and/or produced?

	Plastics mapping	Value chain stage	Please explain
Row 1	Not mapped – and we do not plan to within the next two years	<not applicable=""></not>	

W10.2

(W10.2) Across your value chain, have you assessed the potential environmental and human health impacts of your use and/or production of plastics?

	Impact assessment	Value chain stage	Please explain
Row 1	Not assessed – and we do not plan to within the next two years	<not applicable=""></not>	

W10.3

(W10.3) Across your value chain, are you exposed to plastics-related risks with the potential to have a substantive financial or strategic impact on your business? If so, provide details.

	Risk exposure	Value chain stage	Type of risk	Please explain
Row 1	Not assessed – and we do not plan to within the next two years	<not applicable=""></not>	<not applicable=""></not>	

W10.4

(W10.4) Do you have plastics-related targets, and if so what type?

	Targets in place	Target type	Target metric	Please explain
Row 1	No – and we do not plan to within the next two years	<not applicable=""></not>	<not applicable=""></not>	

W10.5

(W10.5) Indicate whether your organization engages in the following activities.

	Activity applies	Comment
Production of plastic polymers	No	
Production of durable plastic components	No	
Production / commercialization of durable plastic goods (including mixed materials)	No	
Production / commercialization of plastic packaging	No	
Production of goods packaged in plastics	No	
Provision / commercialization of services or goods that use plastic packaging (e.g., retail and food services)	No	

W11. Sign off

W-FI

(W-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.

W11.1

(W11.1) Provide details for the person that has signed off (approved) your CDP water response.

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

Submit your response

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 indicate your consent for CDP to share contact details with the Pacific Institute to support content for its Water Action Hub website.

No

Please confirm below

I have read and accept the applicable Terms

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