DOĞAN ŞİRKETLER GRUBU HOLDİNG A.Ş.

# 2025 CDP Corporate Questionnaire 2025

## Word version

**Important: this export excludes unanswered questions**
This document is an export of your organization's CDP questionnaire response. It contains all data points for questions that are answered or in progress. There may be questions or data points that you have been requested to provide, which are missing from this document because they are currently unanswered. Please note that it is your responsibility to verify that your questionnaire response is complete prior to submission. CDP will not be liable for any failure to do so.
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03/02/2026, 10:13 am

# Contents

# C1. Introduction

## (1.1) In which language are you submitting your response?

*Select from:*

☑ English

## (1.2) Select the currency used for all financial information disclosed throughout your response.

*Select from:*

☑ USD

## (1.3) Provide an overview and introduction to your organization.

### (1.3.2) Organization type

*Select from:*

☑ Publicly traded organization

### (1.3.3) Description of organization

*Doğan Holding A.Ş., established in 1959, is one of Türkiye's largest and most diversified conglomerates. Our operations span multiple sectors, including electricity generation, industry, automotive trade, finance, internet, entertainment, and real estate, contributing significantly to the Turkish economy. As of 2023, we employ 7,935 people, and our wide-reaching group companies play a pivotal role in national employment and sustainable development. At the core of our sustainability strategy is the Doğan Impact Plan, a comprehensive, group-wide initiative that guides our activities towards creating positive environmental, social, and economic impacts. The plan reflects our commitment to integrating Environmental, Social, and Governance (ESG) principles into all aspects of our business, aligned with international frameworks such as the United Nations Sustainable Development Goals (SDGs) and the UN Principles for Responsible Investment (UNPRI), which we signed in 2023. By signing the UNPRI, we reaffirmed our commitment to sustainable investment strategies, governance processes, and long-term business resilience. Doğan Impact Plan Our sustainability strategy under the Doğan Impact Plan is structured around four key pillars: Climate Action and Decarbonization: We are committed to reducing our carbon footprint across our businesses, particularly in energy-intensive sectors like electricity generation and automotive. Our target is to achieve net-zero carbon emissions by 2050, with interim goals that include transitioning to renewable energy and improving energy efficiency across our operations. Resource Efficiency and Circular Economy: We aim to enhance resource efficiency by reducing waste, conserving natural resources, and applying circular economy principles across our value chains. This includes improving water management, minimizing waste generation, and promoting recycling and reuse practices throughout our business processes. Social Responsibility and Inclusivity: We are dedicated to promoting social sustainability through inclusive workplaces, equal opportunities,*

*and social innovation. We actively engage with communities through various projects, particularly in education, health, and culture, ensuring that our business growth positively impacts society. Governance and Transparency: Strong governance is central to our sustainability strategy. We adhere to the highest standards of transparency and accountability, ensuring ESG factors are deeply embedded in our decision-making processes. Our Sustainability Committee oversees the implementation of these strategies and ensures that we meet our ambitious ESG goals. Sustainability Targets and Progress We have established clear sustainability targets under the Doğan Impact Plan. Our long-term goals include achieving net-zero carbon emissions by 2050, increasing the use of renewable energy, and enhancing resource efficiency in water, energy, and waste management. These targets are designed to ensure we meet global sustainability standards and contribute to a more sustainable future. Group-Wide Environmental Reporting Our sustainability reporting consolidates the environmental performance of all Doğan Group companies under one comprehensive framework. This group-wide approach ensures that our subsidiaries, regardless of industry, are aligned with our overarching sustainability goals. As a publicly traded company, we are committed to transparency and regularly disclose our sustainability performance, in line with Türkiye's public disclosure regulations. This ensures that our stakeholders are informed about our progress in reducing environmental impacts and achieving our sustainability targets. Continuous Improvement and Collaboration We are continuously evolving our strategies to address environmental challenges and improve our performance. Through the Doğan Impact Plan, we engage with our stakeholders, including customers, employees, and investors, ensuring that our sustainability goals align with their expectations. Our strong governance structure and ongoing collaborations reinforce our efforts to create long-term value while minimizing environmental and social risks. A Forward-Looking Vision As we move forward, Doğan Holding remains steadfast in our commitment to sustainability, responsible investment, and value creation. Guided by the Doğan Impact Plan, we are determined to lead by example, not only in Türkiye but also on the global stage. By integrating ESG principles into every facet of our operations, we are building a sustainable, resilient business model that addresses the challenges of today while ensuring a brighter, more sustainable future for generations to come.*
*[Fixed row]*

## (1.4) State the end date of the year for which you are reporting data. For emissions data, indicate whether you will be providing emissions data for past reporting years.

### (1.4.1) End date of reporting year

*12/30/2024*

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

*Select from:*
☑ Yes

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

*Select from:*
☑ Yes

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

*Select from:*

☑ 1 year

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

*Select from:*

☑ 1 year

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

*Select from:*

☑ 1 year

*[Fixed row]*

## (1.4.1) What is your organization's annual revenue for the reporting period?

*2390000000*

## (1.5) Provide details on your reporting boundary.

| | Is your reporting boundary for your CDP disclosure the same as that used in your financial statements? |
|---|---|
| | *Select from:*<br>☑ Yes |

*[Fixed row]*

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

## ISIN code - bond

### (1.6.1) Does your organization use this unique identifier?

*Select from:*

☑ No

## ISIN code - equity

### (1.6.1) Does your organization use this unique identifier?

*Select from:*

☑ Yes

### (1.6.2) Provide your unique identifier

*TRFDHOL92315*

## CUSIP number

### (1.6.1) Does your organization use this unique identifier?

*Select from:*

☑ Yes

### (1.6.2) Provide your unique identifier

*TRADOHOL91Q8*

## Ticker symbol

### (1.6.1) Does your organization use this unique identifier?

*Select from:*

☑ No

## SEDOL code

### (1.6.1) Does your organization use this unique identifier?

*Select from:*

☑ Yes

### (1.6.2) Provide your unique identifier

*DOHOL*

## LEI number

### (1.6.1) Does your organization use this unique identifier?

*Select from:*

☑ No

## D-U-N-S number

### (1.6.1) Does your organization use this unique identifier?

*Select from:*

☑ Yes

### (1.6.2) Provide your unique identifier

*789000J24Q4JM3H6UX22*

## Other unique identifier

### (1.6.1) Does your organization use this unique identifier?

*Select from:*

☑ No

*[Add row]*

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

*Select all that apply*
☑ Turkey

## (1.18) Provide details on the mining projects covered by this disclosure, by specifying your project(s) type, location and mining method(s) used.

### Row 1

### (1.18.1) Mining project ID

*Select from:*
☑ Project 1

### (1.18.2) Name

*Hazine Mağara Maden İşletmesi Gümüşhane*

### (1.18.3) Share (%)

*75*

### (1.18.4) Country/Area

*Select from:*
☑ Turkey

### (1.18.5) Latitude

*40.46843*

## (1.18.6) Longitude

*39.67441*

## (1.18.7) Project stage

*Select from:*

☑ Production

## (1.18.8) Mining method

*Select from:*

☑ Open-cut and underground

## (1.18.9) Raw material(s)

*Select all that apply*

☑ Copper

☑ Gold

☑ Silver

☑ Zinc

☑ Lead

## (1.18.10) Year extraction started/is planned to start

*2008*

## (1.18.12) Description of project

*The Gümüşhane Hazine Mağara mining site, which became part of Doğan Holding in 2024 through the acquisition of Gümüştaş, is located in the Eastern Black Sea Region, approximately 2 km southwest of Gümüşhane. Situated within the License Area IR-8479, covering 758.25 hectares under Group IV Minerals, the site encompasses the historically mined Hazine Mağara area, which has been operated since the 12th century and is classified as a brownfield project. By 2020, a total of 128,000 meters of drilling had been completed, including 50,000 meters of surface drilling and 75,000 meters of underground drilling. Following this, a resource update study conducted by RPM Global in 2020 reported an exploitable reserve of 1.7 million tons, with average grades of 5% Pb+Zn, 0.6 g/t Au, 45 g/t Ag, and 0.25% Cu. Currently, all drilling activities are carried out underground, with full mechanization, and the mining methods applied are sublevel caving and cut-and-fill. At*

*the Gümüşhane Hazine Mağara Mine, approximately 550,000 tons of ore are produced annually with an average grade of 5–5.5% Pb+Zn. The run-of-mine ore is transported by road to the processing facility located 18 km east of the site, where flotation is used to produce separate lead, zinc, and copper concentrates, which also contain gold and silver. The site operates under Turkey's national mining and environmental legislation, including Environmental Impact Assessment (EIA) requirements. Due to its proximity to an urban center and its location in an ecologically sensitive mountainous region, biodiversity risks are managed with particular focus on land use, water quality, waste management, and the impacts of ore transportation, all in accordance with regulatory requirements.*

## Row 2

### (1.18.1) Mining project ID

*Select from:*

☑ Project 2

### (1.18.2) Name

*Niğde Bolkar Madeni*

### (1.18.3) Share (%)

*75*

### (1.18.4) Country/Area

*Select from:*

☑ Turkey

### (1.18.5) Latitude

*37.54592*

### (1.18.6) Longitude

*34.58737*

### (1.18.7) Project stage

*Select from:*

☑ Production

## (1.18.8) Mining method

*Select from:*

☑ Underground

## (1.18.9) Raw material(s)

*Select all that apply*

☑ Gold

☑ Silver

☑ Zinc

☑ Lead

## (1.18.10) Year extraction started/is planned to start

*2012*

## (1.18.12) Description of project

*The Niğde Bolkar Oxide mining site which became part of Doğan Holding in 2024 through the inclusion of Gümüştaş, is located in the Central Toros Mountains, approximately 1.5 km east of Maden village. Identified as polymetallic (Pb, Zn, Au, Ag), the Niğde Bolkar Mine is situated in the historically rich Bolkar region, known since antiquity for its mineral resources and documented mining activities dating back to the Hittite period, and later continued under Byzantine and Ottoman rule. The Bolkar 1 and 2 license areas were incorporated into Gümüştaş in 2007, where an active exploration program was developed. The presence of dozens of ancient Roman underground workings in the area has provided valuable guidance for modern exploration activities.As a result of combined surface and underground activities, the Niğde Bolkar Mine commenced production in the oxide zone in 2012. The run-of-mine ore is processed at the Tepeköy beneficiation plant, where the first silver and gold were produced. To date, a total of 50,000 meters of drilling has been carried out both on the surface and underground, with ongoing exploration continuing underground. The most recent internal studies have identified a total of 250,000 tons of mineable oxide ore in the Bolkar 1 and 2 areas, with average grades of 4 g/t Au and 160 g/t Ag. The Niğde Bolkar underground oxide mine produces approximately 60,000 tons of ore annually, with average grades of 3.5–4 g/t Au and 120–160 g/t Ag. The project operates under Turkey's national mining and environmental legislation, including Environmental Impact Assessment (EIA) requirements. Given its location in a mountainous region with ecological sensitivity and its proximity to nearby settlements, biodiversity risks are managed with a focus on land disturbance, water quality, and waste management, in alignment with regulatory requirements.*

*[Add row]*

## (1.24) Has your organization mapped its value chain?

### (1.24.1) Value chain mapped

*Select from:*

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

### (1.24.2) Value chain stages covered in mapping

*Select all that apply*

☑ Upstream value chain

☑ Downstream value chain

### (1.24.3) Highest supplier tier mapped

*Select from:*

☑ Tier 1 suppliers

### (1.24.4) Highest supplier tier known but not mapped

*Select from:*

☑ Tier 2 suppliers

### (1.24.7) Description of mapping process and coverage

*In alignment with the Doğan Impact Plan, we remain strongly committed to sustainable supply chain management by embedding environmental, social, and ethical standards across all procurement processes. Our value chain mapping enhances traceability and accountability at every stage, with particular focus on upstream suppliers and downstream customers. This approach ensures all critical stakeholders align with sustainability goals such as resource efficiency, emissions reduction, and ethical practices. Doğan Holding has adopted a Group-wide Supply Chain Management Policy to safeguard the sustainability of its value chain and to promote responsible business practices across its operations. The policy, extends beyond direct suppliers to include external service providers such as consultants, auditors, and legal advisors, fostering compliance with ethical principles, occupational health and safety standards, and anti-corruption measures. It also supports effective risk management in line with national and international regulations, while contributing to the Holding's sustainability objectives and enhancing ESG performance throughout the value chain. As of 2024, we have engaged 13,533 suppliers. Our mapping now extends to Tier 2 suppliers across diverse industries. Strategic suppliers, defined by materiality and spend, are prioritized, and 201 suppliers have undergone detailed environmental and social audits to verify compliance with our sustainability criteria and long-term goals. These audits verify adherence to ESG standards, ethical principles, and labor rights regulations. To enhance transparency, we engage suppliers through surveys, audits, and training programs, supported by digital tools that track sustainability performance. Supplier reporting is integrated*

*into our environmental metrics, enabling us to measure progress effectively. This engagement has delivered tangible outcomes, including improved environmental performance, emissions reduction, and wider adoption of best practices across the supply chain. Furthermore, our proactive approach helps anticipate risks linked to resource scarcity, supply chain disruptions, and regulatory compliance, thereby strengthening resilience strategies. We are also expanding oversight to Tier 3 suppliers to ensure the entire value chain contributes to our sustainability objectives and reinforces our leadership in corporate sustainability.*
*[Fixed row]*

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

### (1.24.1.1) Plastics mapping

*Select from:*

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

### (1.24.1.2) Value chain stages covered in mapping

*Select all that apply*

☑ End-of-life management

### (1.24.1.4) End-of-life management pathways mapped

*Select all that apply*

☑ Recycling

☑ Landfill

*[Fixed row]*

## C2. Identification, assessment, and management of dependencies, impacts, risks, and opportunities

### (2.1) How does your organization define short-, medium-, and long-term time horizons in relation to the identification, assessment, and management of your environmental dependencies, impacts, risks, and opportunities?

### Short-term

#### (2.1.1) From (years)

*0*

#### (2.1.3) To (years)

*3*

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

*Our short-term horizon is defined as 0-3 years, covering our OPEX and CAPEX plans in our annual financial budgets. In this timeframe, we primarily focus on optimizing operational efficiency and ensuring alignment with immediate sustainability targets. We also integrate short-term environmental risks and opportunities identified through our regular assessments, particularly those related to regulatory changes and immediate operational impacts such as resource efficiency*

### Medium-term

#### (2.1.1) From (years)

*3*

#### (2.1.3) To (years)

*6*

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

*The medium-term is defined as 3-6 years, covering a time horizon aligned with our review and revision of Doğan Holding's business strategy. During this period, we actively assess the potential environmental risks and opportunities impacting our businesses. Strategic adjustments are made, such as capital allocation for environmental projects, integrating sustainability considerations in growth initiatives, and improving resource efficiency. Our focus is on mid-term sustainability commitments, including emission reductions and increasing renewable energy usage across our group companies.*

## Long-term

### (2.1.1) From (years)

*6*

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

*Select from:*

☑ Yes

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

*Our long-term horizon spans 6 years and beyond, and it is considered a significant period for embedding environmental sustainability into Doğan Holding's corporate system. Long-term goals include substantial reductions in GHG emissions, transitioning our energy use towards renewables, and achieving ambitious sustainability targets across our value chain. This period is crucial for strategic initiatives such as large-scale investments in sustainable technologies and meeting our long-term climate goals aligned with the Doğan Impact Plan.*
*[Fixed row]*

## (2.2) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts?

| | Process in place | Dependencies and/or impacts evaluated in this process | Biodiversity impacts evaluated before the mining project development stage |
|---|---|---|---|
| | *Select from:* | *Select from:* | *Select from:* |

| | Process in place | Dependencies and/or impacts evaluated in this process | Biodiversity impacts evaluated before the mining project development stage |
|---|---|---|---|
| | ☑ Yes | ☑ Both dependencies and impacts | ☑ Yes, in all cases |

*[Fixed row]*

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

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

*[Fixed row]*

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

### Row 1

### (2.2.2.1) Environmental issue

*Select all that apply*

☑ Climate change

☑ Water

☑ Plastics

☑ Biodiversity

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

*Select all that apply*

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

## (2.2.2.3) Value chain stages covered

*Select all that apply*

☑ Direct operations

☑ Upstream value chain

☑ Downstream value chain

## (2.2.2.4) Coverage

*Select from:*

☑ Full

## (2.2.2.5) Supplier tiers covered

*Select all that apply*

☑ Tier 1 suppliers

## (2.2.2.6) Mining projects covered

*Select all that apply*

☑ All disclosed mining projects

## (2.2.2.7) Type of assessment

*Select from:*

☑ Qualitative and quantitative

## (2.2.2.8) Frequency of assessment

*Select from:*

☑ More than once a year

## (2.2.2.9) Time horizons covered

*Select all that apply*

☑ Short-term

☑ Medium-term

☑ Long-term

## (2.2.2.10) Integration of risk management process

*Select from:*

☑ Integrated into multi-disciplinary organization-wide risk management process

## (2.2.2.11) Location-specificity used

*Select all that apply*

☑ Site-specific

☑ Local

☑ Sub-national

☑ National

## (2.2.2.12) Tools and methods used

International methodologies and standards

☑ Environmental Impact Assessment

☑ IPCC Climate Change Projections
☑ ISO 14001 Environmental Management Standard

Other
☑ Scenario analysis

## (2.2.2.13) Risk types and criteria considered

Acute physical
☑ Heat waves
☑ Heavy precipitation (rain, hail, snow/ice)
☑ Wildfires

Chronic physical
☑ Water stress

Policy
☑ Carbon pricing mechanisms
☑ Changes to international law and bilateral agreements
☑ Changes to national legislation

## (2.2.2.14) Partners and stakeholders considered

*Select all that apply*
☑ Customers
☑ Employees
☑ Local communities
☑ Suppliers

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

*Select from:*

☑ No

## (2.2.2.16) Further details of process

*At Doğan Holding, we have established a robust and recurring process for identifying, assessing, and managing environmental dependencies, impacts, risks, and opportunities across our entire value chain. This process is critical to ensuring that our organization not only mitigates risks but also leverages opportunities in alignment with our Doğan Impact Plan and broader sustainability goals. In 2024, within the scope of TSRS 2 (IFRS S2) reporting and to reflect the inclusion of new companies and sectors into the Group, we repeated this assessment to ensure comprehensive coverage and alignment. Our assessment process is fully integrated into the company's risk management framework. This multi-disciplinary approach ensures that environmental risks and opportunities are considered alongside traditional financial and operational risks, providing a holistic view of the business's vulnerabilities and growth potential. We engage regularly with a broad range of stakeholders, including customers, employees, suppliers, and local communities, to inform our environmental strategy and decision-making. Coverage and Focus Areas: Climate Change:We assess our direct operations and both upstream and downstream value chains to identify how climate change may impact our business, including changes in regulatory environments, shifts in market demands, and potential physical risks such as extreme weather events. We consider both acute and chronic climate-related risks as part of this process. These risks are evaluated against their potential impact on our financial performance, operational continuity, and stakeholder relations. In this context, we have also examined acute physical risks such as forest fires, which may cause disruptions to assets, logistics, and nearby communities, and chronic physical risks such as changes in wind regimes, which can affect production efficiency and long-term business continuity. Both risk types are integrated into our resilience strategies and strategic planning to ensure adaptation and preparedness. Water: Water is a critical resource in many of our business activities, and we actively manage our dependencies on water resources. We assess water availability, quality, and usage patterns, particularly in areas prone to water stress or scarcity. We evaluate our operations for potential impacts on local water sources and work with local communities to ensure sustainable water management practices. Plastics: Given our involvement in various industries, managing the risks associated with plastic production and disposal is an essential focus. We assess the environmental impact of plastics across the value chain, from production to end-of-life, ensuring that we minimize our plastic footprint through recycling initiatives, the adoption of biodegradable materials, and reducing single-use plastic consumption. Biodiversity: We recognize that biodiversity is essential to the resilience of ecosystems that support our business operations. We assess the potential impacts of our activities on local biodiversity and work to mitigate negative outcomes through habitat conservation, reforestation, and sustainable land-use practices in collaboration with local stakeholders and environmental experts.*
*[Add row]*

## (2.2.3) Provide mining-specific details of your organization’s process for identifying, assessing, and managing biodiversity impacts.

### Row 1

## (2.2.3.1) Mining project ID

*Select from:*
☑ Project 1

## (2.2.3.2) Extent of assessment

*Select from:*

☑ A limited or focused environmental and social assessment

## (2.2.3.3) Impacts considered

*Select all that apply*

☑ Direct impacts

☑ Indirect impacts

☑ Cumulative impacts

## (2.2.3.4) Scope defined by

*Select all that apply*

☑ Governmental agency requirements

☑ Company own standards and/or policies

## (2.2.3.5) Aspects considered

*Select all that apply*

☑ Threatened species

☑ Natural habitats

☑ Ecosystem services

## (2.2.3.6) Baseline biodiversity data available

*Select from:*

☑ No

## (2.2.3.7) Environmental Impact Statement publicly available

*Select from:*

☑ Yes

## (2.2.3.8) Please explain

*At Doğan Holding, we recognize the strong link between the sustainability of our operations and the health of the ecosystems in which we operate. Accordingly, we treat biodiversity as one of our Group-wide priority topics. By understanding our dependencies and impacts on nature, we aim to establish a common governance approach and take concrete actions in this area. Our mining subsidiary Gümüştaş, which has a direct potential impact on habitats and soil integrity, conducts environmental monitoring through TS EN ISO/IEC 17025 accredited laboratories and regularly tracks impacts such as dust, water, and waste management. The company also implements rehabilitation initiatives and energy efficiency practices to reduce environmental pressures. Within the scope of Project – 1, a comprehensive environmental and social assessment was undertaken, considering direct, indirect, and cumulative impacts. The scope was defined by governmental agency requirements and company standards, covering natural habitats, threatened species, and ecosystem services. To ensure accountability, Gümüştaş conducts regular monitoring in line with Environmental Impact Assessment (EIA) commitments and regulations. Dust emissions are measured in accordance with the Industrial Air Pollution Control Regulation, including particulate matter at mining operations and enrichment facilities. Surface water, groundwater, wastewater, and drinking water are sampled and analyzed by accredited laboratories, with results reported to the Ministry of Environment, Urbanization and Climate Change. Groundwater from galleries is treated in sedimentation pools before discharge to ensure compliance with standards. For waste management, tailings from ore enrichment are stored in licensed tailings storage facilities (TSFs) approved by the Ministry, with continuous monitoring and reporting. The company applies zero-waste principles by classifying wastes under regulatory codes and transferring them to licensed firms for recycling or disposal through the MOTAT (Mobile Waste Tracking) system, ensuring traceability. Rehabilitation and reforestation are systematically carried out to restore land post-mining, reinforcing Gümüştaş's long-term commitment to minimizing biodiversity impacts.*
*[Add row]*

# (2.2.7) Are the interconnections between environmental dependencies, impacts, risks and/or opportunities assessed?

## (2.2.7.1) Interconnections between environmental dependencies, impacts, risks and/or opportunities assessed

*Select from:*
☑ Yes

## (2.2.7.2) Description of how interconnections are assessed

*At Doğan Holding, we recognize the complex interconnections between environmental dependencies, impacts, risks, and opportunities across our diverse operations, which span industries such as electricity generation, industry and trade, automotive, finance and investment, internet and entertainment, real estate investments, and mining. To effectively assess and manage these interconnections, we have developed a comprehensive approach that integrates multiple environmental factors into our overall risk and opportunity management framework. Our assessment process is built upon the guidance of recognized international standards, such as the Task Force on Climate-related Financial Disclosures (TCFD), Sustainable Development Goals (SDGs) and Türkiye Sustainability Reporting Standards (TSRS). We consider the interdependencies between key environmental issues, including climate change, water security, biodiversity loss, and pollution management, throughout our entire value chain. These interconnections are especially critical in sectors where natural resource usage is high, such as our energy and real estate operations. In practice, we begin by identifying the primary environmental dependencies of each business unit, assessing how these dependencies interact with other environmental factors, and evaluating the cumulative risks and opportunities these interactions present. For example, in our energy sector, we assess how climate*

*change impacts wind patterns, which in turn affects our power generation capacity. Similarly, across our real estate and mining operations, we assess the interdependence of water management, biodiversity conservation, and climate resilience as essential pillars of long-term operational sustainability. We incorporate these interconnections into the broader risk management process, as outlined in Section 2.2.2. This approach allows us to evaluate the potential trade-offs between environmental risks and opportunities and helps to identify synergies that can enhance our resilience. For example, by investing in renewable energy solutions across our operations, we mitigate both our climate change risks and reduce our water usage, aligning with our broader sustainability objectives outlined in the Doğan Impact Plan. This holistic assessment approach enables us to better understand the cumulative impact of environmental risks and opportunities, ensuring that we are prepared to address complex, interconnected environmental challenges that may arise in the future. Additionally, this process informs our strategic decision-making and strengthens our ability to capitalize on emerging opportunities within the green economy.*
*[Fixed row]*

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

### (2.3.1) Identification of priority locations

*Select from:*

☑ Yes, we are currently in the process of identifying priority locations

### (2.3.2) Value chain stages where priority locations have been identified

*Select all that apply*

☑ Direct operations

### (2.3.3) Types of priority locations identified

Sensitive locations

☑ Areas important for biodiversity

### (2.3.4) Description of process to identify priority locations

*At Doğan Holding, we are currently in the process of identifying our priority locations, focusing on areas where our operations, both direct and across the value chain, interact with ecologically sensitive regions and areas of high environmental impact. This initiative will prioritize locations based on a multi-criteria assessment approach, which will incorporate several tools, data sources, and metrics to assess environmental dependencies, impacts, risks, and opportunities across each location. As part of this process, we will map all operational sites, including upstream and downstream value chain stages, to identify interfaces with nature-sensitive areas such as biodiversity hotspots, areas prone to water scarcity, and ecosystems that provide critical services (e.g., flood mitigation). The following steps will be taken: Data and Tools to be Used: We plan to leverage GIS mapping technologies, satellite imagery, and external data platforms (such as the World Resources*

*Institute's Aqueduct Water Risk Atlas and IBAT) to assess geographical and environmental vulnerabilities. These datasets will be overlaid with our operational footprint to identify potential risk areas. Metrics and Indicators: For each location, we will assess biodiversity significance, water availability, flood risks, and ecosystem integrity. These metrics are critical in evaluating the environmental significance of each site and identifying potential vulnerabilities that could affect our business operations or supply chain. Thresholds for Sensitive Locations: Sensitive locations will be determined using thresholds for ecosystem decline, biodiversity richness, and environmental service dependency. For example, locations where water availability is under stress or areas identified as key biodiversity areas will be flagged as high-priority. Geographical Specificity: The assessments will be conducted at multiple levels—site-specific, regional, and national—depending on the extent of operations and the environmental impact in those areas. We will prioritize sensitive areas based on both operational footprint and local ecosystem needs. Future Plans for Continuous Improvement: In line with our sustainability strategy, we will continuously refine our process for identifying priority locations by incorporating real time data and using enhanced predictive modeling tools. Our aim is to ensure that this process remains robust and adaptive to evolving environmental risks and opportunities. Once these methodologies are fully integrated, we will be well-positioned to identify areas where interventions are most needed, supporting our broader environmental and sustainability goals.*

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

*Select from:*

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

*[Fixed row]*

## (2.4) How does your organization define substantive effects on your organization?

## Risks

### (2.4.1) Type of definition

*Select all that apply*

☑ Qualitative

☑ Quantitative

### (2.4.2) Indicator used to define substantive effect

*Select from:*

☑ Asset value

### (2.4.3) Change to indicator

*Select from:*

☑ % decrease

## (2.4.4) % change to indicator

*Select from:*

☑ 1-10

## (2.4.6) Metrics considered in definition

*Select all that apply*

☑ Frequency of effect occurring

☑ Time horizon over which the effect occurs

☑ Likelihood of effect occurring

## (2.4.7) Application of definition

*In the case of risks, a decrease equal to or more than the %1 of Total Assets in group level is considered as substantive effect. The metrics used in this definition include the frequency of the effect occurring, the time horizon over which the effect occurs, and the likelihood of the effect occurring. Frequency of effect occurring: The risks are assessed annually as part of our financial and operational review process. Time horizon over which the effect occurs: Risks are assessed over short-, medium-, and long-term time horizons as defined in question 2.1 (0-3 years, 3-6 years and 6+ years respectively). Substantive effects could manifest across these timeframes, depending on the severity and type of risk. Likelihood of effect occurring: Risks with equal to or more than 1% likelihood of decreasing Total Assets in group level are considered substantive.*

# Opportunities

## (2.4.1) Type of definition

*Select all that apply*

☑ Qualitative

☑ Quantitative

## (2.4.2) Indicator used to define substantive effect

*Select from:*

☑ Asset value

## (2.4.3) Change to indicator

*Select from:*

☑ % increase

## (2.4.4) % change to indicator

*Select from:*

☑ 1-10

## (2.4.6) Metrics considered in definition

*Select all that apply*

☑ Frequency of effect occurring

☑ Time horizon over which the effect occurs

☑ Likelihood of effect occurring

## (2.4.7) Application of definition

*For opportunities, an increase equal to or more than the %1 of Total Assets in group level is considered as substantive effect. The metrics used in this definition include the same factors as risks: frequency of occurrence, time horizon, and likelihood. Frequency of effect occurring: Opportunities are assessed annually as part of our strategic planning cycle. Time horizon over which the effect occurs: Opportunities are evaluated over short-, medium-, and long-term horizons, similar to risks (0-3 years, 3-6 years and 6+ years). Opportunities with substantive financial impact are expected to realize within these timeframes based on strategic initiatives. Likelihood of effect occurring: Opportunities with equal to or more than 1% likelihood of increasing Total Assets at a group level of are deemed substantive.*
*[Add row]*

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

## (2.5.1) Identification and classification of potential water pollutants

*Select from:*

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

## (2.5.3) Please explain

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

## C3. Disclosure of risks and opportunities

### (3.1) Have you identified any environmental risks which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

### Climate change

#### (3.1.1) Environmental risks identified

*Select from:*

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

### Water

#### (3.1.1) Environmental risks identified

*Select from:*

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

### Plastics

#### (3.1.1) Environmental risks identified

*Select from:*

☑ No

#### (3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

*Select from:*

☑ Environmental risks exist, but none with the potential to have a substantive effect on our organization

## (3.1.3) Please explain

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

### Biodiversity

## (3.1.1) Environmental risks identified

*Select from:*

☑ No

## (3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

*Select from:*

☑ Environmental risks exist, but none with the potential to have a substantive effect on our organization

## (3.1.3) Please explain

*We have identified certain biodiversity-related risks, particularly linked to land use and habitat impacts in mining operations within our value chain. However, these risks are currently not anticipated to have a substantive effect on our organization. This assessment is based on the implementation of rehabilitation plans, environmental monitoring, and compliance with national regulations, as well as initiatives to reduce pressures on ecosystems through energy efficiency and waste management practices. In addition, biodiversity impacts are localized to specific sites and do not pose a substantive financial risk at the group level when assessed against our 1% Total Asset decrease threshold.*
*[Fixed row]*

## (3.1.1) Provide details of the environmental risks identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

### Climate change

## (3.1.1.1) Risk identifier

*Select from:*

☑ Risk1

## (3.1.1.3) Risk types and primary environmental risk driver

Acute physical

☑ Wildfires

## (3.1.1.4) Value chain stage where the risk occurs

*Select from:*

☑ Direct operations

## (3.1.1.6) Country/area where the risk occurs

*Select all that apply*

☑ Turkey

## (3.1.1.9) Organization-specific description of risk

*Climate change-driven increases in temperature, drought, and low humidity conditions significantly elevate the likelihood, frequency, and severity of wildfires. Power plants located in rural and forested regions face heightened exposure to this risk. Galata Wind's Şah Wind Power Plant in Mersin is particularly vulnerable to wildfire incidents, which could result in severe damage to turbines and infrastructure. Such events may lead to complete operational shutdowns or reduced generation capacity even in cases of partial damage, as well as prolonged repair and maintenance periods. Additionally, post-fire damage assessment, restoration, and reconstruction activities would incur substantial costs and cause significant operational delays.*

## (3.1.1.11) Primary financial effect of the risk

*Select from:*

☑ Other, please specify :Total Assets Loss, CAPEX Loss

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

*Select all that apply*

☑ Medium-term

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

*Select from:*

☑ Virtually certain

## (3.1.1.14) Magnitude

*Select from:*

☑ High

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

*Wildfire risk, driven by climate change-related increases in temperature, drought, and low humidity, poses a significant threat to assets located in rural and forested areas. Galata Wind's Mersin Wind Power Plant is among the most vulnerable facilities due to its proximity to forested zones. A wildfire incident could lead to severe damage to turbines and transmission infrastructure, causing partial or complete operational shutdowns. Even in cases of partial damage, extended repair and maintenance timelines could reduce generation capacity, while post-fire activities such as damage assessment, restoration, and reconstruction would create operational delays and increase costs. These disruptions may also compromise energy supply commitments, affecting business continuity and stakeholder confidence.*

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

*Select from:*

☑ Yes

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

*0*

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

*4447800000*

## (3.1.1.25) Explanation of financial effect figure

*Forward-looking financial impact analysis was carried out for Galata Wind's Mersin plant. In the event of wildfire-induced damage and operational disruptions, an annual production loss of approximately 360,000 MWh is anticipated. Based on a unit price of 85 USD/MWh, this would result in an estimated revenue loss of around 1,080 million TL. Furthermore, if the entire plant capacity is physically damaged, additional capital expenditures of approximately 4,447,800,000 TL may be required, calculated using an investment cost of 42,360,000 million per MW. Such a scenario would also lead to significant cash flow reductions and potential financial stress for the company.*

## (3.1.1.26) Primary response to risk

Infrastructure, technology and spending

☑ Increase environment-related capital expenditure

## (3.1.1.27) Cost of response to risk

*22000000*

## (3.1.1.28) Explanation of cost calculation

*The total estimated cost of implementing these measures is approximately 22,000,000 TL. Of this amount, 20,000,000 TL will be allocated for the purchase of three water tankers to be added to Galata Wind's operational inventory across three sites. The remaining 2,000,000 TL is budgeted for the installation of 5-ton water tanks beneath each turbine. These investments are considered essential for enhancing operational resilience against climate-driven physical risks and minimizing potential downtime and financial losses.*

## (3.1.1.29) Description of response

*To mitigate the risk of wildfires impacting wind power operations, Galata Wind has planned proactive measures to strengthen fire prevention and response capabilities. The response strategy includes the procurement of three water tankers to be stationed across three critical sites, ensuring rapid intervention in case of a fire outbreak. Additionally, 5-ton water storage tanks will be installed under each turbine to provide an immediate water source for firefighting efforts. These actions aim to reduce the likelihood and severity of wildfire-related damage, safeguard generation assets, and maintain business continuity.*

# Water

## (3.1.1.1) Risk identifier

*Select from:*

☑ Risk3

## (3.1.1.3) Risk types and primary environmental risk driver

Chronic physical

☑ Water stress

## (3.1.1.4) Value chain stage where the risk occurs

*Select from:*

☑ Direct operations

## (3.1.1.6) Country/area where the risk occurs

*Select all that apply*

☑ Turkey

## (3.1.1.7) River basin where the risk occurs

*Select all that apply*

☑ Other, please specify :Konya closed basin in Turkiye

## (3.1.1.9) Organization-specific description of risk

*Water stress represents a material chronic physical risk for Doğan Holding's mining subsidiary, Gümüştaş. The company's operations in the Niğde region depend on water-intensive processes such as ore processing, flotation, leaching, and dust suppression, which require continuous and sufficient water supply. These needs are met from the Konya Closed Basin, one of Turkey's most water-stressed regions due to over-extraction, unsustainable agricultural irrigation, and the impacts of climate change. Rising temperatures, prolonged droughts, irregular precipitation, and declining groundwater levels increase the vulnerability of the basin and amplify risks for operational continuity. Any restriction or disruption in water supply could limit production capacity, raise operating costs, and create compliance challenges. Although Gümüştaş accounts for less than 1% of Doğan Holding's overall portfolio and revenue distribution, its localized dependency on reliable water access highlights the importance of proactive risk management. Measures under consideration include water efficiency improvements, exploration of alternative supply sources, and enhanced monitoring of basin-level water availability to safeguard operational resilience.*

## (3.1.1.11) Primary financial effect of the risk

*Select from:*

☑ Disruption in production capacity

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

*Select all that apply*

☑ Medium-term

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

*Select from:*

☑ Likely

## (3.1.1.14) Magnitude

*Select from:*

☑ High

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

*Water scarcity may reduce production volumes and cause temporary stoppages in ore processing operations, leading to potential revenue losses in the medium to long term. The requirement for new wells, pumping systems, and water recycling technologies will also increase operating and capital costs. If scarcity intensifies, the overall cost of securing sufficient water resources could place additional financial pressure on the business.*

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

*Select from:*

☑ Yes

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

*706000000*

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

*1412000000*

## (3.1.1.25) Explanation of financial effect figure

*The water stress risk linked to ore processing operations is considered a significant long-term physical risk with the potential to affect operational continuity. While this risk has not yet materialized during the current reporting period and therefore no direct financial impact has been observed, regional water scarcity pressures and future investment needs highlight its strategic importance. Due to the high uncertainty around both timing and magnitude, it is not currently possible to provide a quantified financial estimate. For this reason, the risk is classified as “material” at the Holding level and placed under continuous monitoring.*

## (3.1.1.26) Primary response to risk

Infrastructure, technology and spending

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

## (3.1.1.27) Cost of response to risk

*5295000*

## (3.1.1.28) Explanation of cost calculation

*The estimated cost focuses on the cost of the risk management of mining sector which matters most and has material effect. Total cost includes the Total water supply cost; rental fees, electricity costs and new well drilling costs. The calculation is 5,295,000 TL*

## (3.1.1.29) Description of response

*Gümüştaş Mining has integrated water stress risk into its corporate risk management and strategic planning processes. Actions include installation of water recycling and recovery systems to reduce freshwater demand, deployment of advanced treatment technologies, and flexible scheduling of water-intensive processes according to seasonal availability. Additional groundwater wells have been drilled, with further investment planned to secure supply reliability. The company also engages with local authorities and stakeholders to support sustainable basin-level water management. Scenario analysis using the WRI Aqueduct tool under RCP 4.5 and RCP 8.5 for 2030 and 2050 has been conducted, confirming long-term exposure and guiding resilience measures.*

# Climate change

## (3.1.1.1) Risk identifier

*Select from:*

☑ Risk2

## (3.1.1.3) Risk types and primary environmental risk driver

Chronic physical

☑ Other chronic physical risk, please specify :Wind Regime Change

## (3.1.1.4) Value chain stage where the risk occurs

*Select from:*

☑ Direct operations

## (3.1.1.6) Country/area where the risk occurs

*Select all that apply*

☑ Turkey

## (3.1.1.9) Organization-specific description of risk

*Climate change-induced shifts in wind regimes pose a significant physical risk to wind energy operations by reducing capacity factors and negatively affecting production efficiency. For Galata Wind's wind farms, long-term variations in meteorological conditions—such as reduced wind speeds and changes in wind consistency—could lead to fluctuations in plant performance and energy output losses. Decreases in average wind speeds may cause deviations in annual energy production and associated revenue, while sudden wind pattern changes and increased turbulence could accelerate mechanical wear on turbine components, leading to higher maintenance and repair costs. In particular, low-wind-year scenarios have the potential to exert financial pressure on the long-term viability and profitability of these assets.*

## (3.1.1.11) Primary financial effect of the risk

*Select from:*

☑ Decreased revenues due to reduced production capacity

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

*Select all that apply*

☑ Medium-term

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

*Select from:*

☑ Virtually certain

## (3.1.1.14) Magnitude

*Select from:*

☑ Low

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

*Changes in wind regimes driven by climate change may reduce the capacity factor of wind farms, directly impacting energy generation efficiency. For Galata Wind's portfolio, long-term variability in wind speeds and consistency could lead to deviations in annual generation output, affecting revenue streams and overall financial performance. Lower-than-expected wind conditions, particularly in low-wind-year scenarios, could create downward pressure on profitability and strain cash flows by reducing operating income while increasing maintenance and repair costs due to higher mechanical stress on turbines from irregular wind patterns. Although this risk did not materialize during the reporting period, its systemic nature and potential impact on operational sustainability warrant ongoing monitoring at the holding level.*

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

*Select from:*

☑ Yes

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

*450000000*

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

*450000000*

## (3.1.1.25) Explanation of financial effect figure

*A forward-looking analysis compared the average capacity factor over the last five years with data from 2014, recorded as a low-wind year. Based on this comparison, a potential generation shortfall of approximately 150,000 MWh was identified under unfavorable wind conditions. Using an average unit sales price of 85*

*USD/MWh, this corresponds to an estimated revenue loss of about 450,000,000 TL. While this projected impact remains below Doğan Holding's financial materiality threshold, it is considered a climate-related systemic risk and is therefore monitored as part of the company's broader risk management and resilience strategy.*

## (3.1.1.26) Primary response to risk

Policies and plans

☑ Develop a climate transition plan

## (3.1.1.27) Cost of response to risk

*4410947*

## (3.1.1.28) Explanation of cost calculation

*The total cost of implementing these monitoring and optimization measures for mitigating wind regime change risk is estimated at 4,410,947 TL. This amount primarily covers the integration of advanced SCADA and meteorological monitoring systems across operational sites, including hardware, software, and system optimization costs. The calculation excludes large-scale strategic investments such as hybrid power plant development and energy storage projects, which are accounted for separately under capital expenditure planning.*

## (3.1.1.29) Description of response

*Galata Wind addresses wind regime change risk through advanced SCADA and meteorological monitoring systems for real-time data analysis and capacity optimization, supported by geographic diversification of new investments to reduce regional variability impacts. Additional resilience measures include hybridization of wind farms with solar capacity (e.g., 30 MW SPP in Bursa), plans for 410 MWh energy storage systems (2026–2030), and 300 MW solar projects in Germany and Italy to ensure long-term production stability and portfolio diversification.*
*[Add row]*

# (3.1.2) Provide the amount and proportion of your financial metrics from the reporting year that are vulnerable to the substantive effects of environmental risks.

## Climate change

## (3.1.2.1) Financial metric

*Select from:*

☑ Assets

## (3.1.2.2) Amount of financial metric vulnerable to transition risks for this environmental issue (unit currency as selected in 1.2)

*0*

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

*Select from:*

☑ Less than 1%

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

*4897800000*

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

*Select from:*

☑ 1-10%

## (3.1.2.7) Explanation of financial figures

*Financial effect of risks amount are derived from the sum of values defined for physical risks for each time horizon. These values are divided into our total assets figure.*

# Water

## (3.1.2.1) Financial metric

*Select from:*

☑ Assets

## (3.1.2.2) Amount of financial metric vulnerable to transition risks for this environmental issue (unit currency as selected in 1.2)

*0*

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

*Select from:*

☑ Less than 1%

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

*1412000000*

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

*Select from:*

☑ Less than 1%

## (3.1.2.7) Explanation of financial figures

*Financial effect of risks are derived from the sum of values defined for physical risks for each time horizon. These values are divided into our total assets figure. [Add row]*

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

### Row 1

## (3.2.1) Country/Area & River basin

Turkey

☑ Other, please specify :Konya closed basin

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

*Select all that apply*

☑ Direct operations

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

*1*

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

*Select from:*

☑ Less than 1%

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

*Select from:*

☑ Less than 1%

## (3.2.11) Please explain

*Doğan Holding's mining subsidiary, Gümüştaş, operates in the Niğde region, a region where water scarcity and water-related risks are significant. This region is vulnerable to water stress and drought due to climate change and other environmental factors. Operations in this river basin play a significant role in Gümüştaş's overall production, and their exposure to water-related risks can disrupt operations and lead to significant revenue losses. The percentage of global revenue that may be affected stems from operational dependence on water. Operational disruptions due to water scarcity can lead to delays, increased operational costs associated with alternative water sources, and even temporary closures. Doğan Holding implements water management strategies to mitigate these risks, including the adoption of water-efficient technologies, water recycling and reuse practices, as well as contingency planning for extreme weather events. However, without sufficient investment in long-term water resilience initiatives, the risk remains significant. Gümüştaş, which operates in the mentioned region, accounts for less than 1% of Doğan Holding's diverse and broad-sector portfolio and contributes less than 1% to Doğan Holding's revenue distribution. Nevertheless, this operation contributes significantly to our operational output, and ensuring water security remains a priority for Doğan Holding in both the medium and long term. Therefore, we will continue to assess our water risk exposure and integrate potential developments into our risk management strategies*

*[Add row]*

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

### (3.3.1) Water-related regulatory violations

*Select from:*

☑ No

### (3.3.3) Comment

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

## (3.4) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for violation of biodiversity-related regulation?

### (3.4.1) Any penalties for violation of biodiversity-related regulation?

*Select from:*

☑ No

### (3.4.2) Comment

*Doğan Holding places strong emphasis on protecting biodiversity and natural habitats across all areas of its operations. A group-wide environmental management framework guides our approach, ensuring that we remain aligned with applicable regulations and recognized standards. We actively seek to minimize our impact on ecosystems through ongoing monitoring, adoption of responsible practices, and continuous improvement efforts. Regular assessments help us maintain high levels of compliance, while awareness and training initiatives foster a culture of responsibility among employees. Through these measures, we aim to safeguard biodiversity,*

*support sustainable land use, and uphold our commitment to environmental stewardship. Thanks to these efforts, no biodiversity-related regulatory breaches were recorded during the reporting period.*
*[Fixed row]*

## (3.5) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?

*Select from:*

☑ No, but we anticipate being regulated in the next three years

## (3.5.4) What is your strategy for complying with the systems you are regulated by or anticipate being regulated by?

*Turkiye has recently enacted its first Climate Law, which legally establishes the Turkish Emissions Trading System (TR ETS). A draft implementing regulation was published on 22 July 2025 and was open for public consultation until early August. The regulation sets out a pilot phase for 2026–2027, initially covering power generation and high-emitting industrial facilities such as cement, steel, and aluminium with annual emissions above 50,000 $tCO_2e$. The system foresees mechanisms such as free allocation, intensity-based caps, banking and borrowing, market stability reserves, and the use of domestic carbon credits. While Doğan Holding does not currently operate in the sectors directly included in the scope of the TR ETS. Doğan Holding closely monitors developments regarding the upcoming Turkish ETS and the EU Carbon Border Adjustment Mechanism (CBAM). This proactive stance will enable us to effectively manage potential future impacts of carbon pricing on our business and value chain. Doğan Holding is enhancing GHG data infrastructure, investing in low-carbon technologies, and supporting its subsidiaries in carbon footprint tracking and validation to ensure future compliance and competitiveness.*

## (3.6) Have you identified any environmental opportunities which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

### Climate change

### (3.6.1) Environmental opportunities identified

*Select from:*

☑ Yes, we have identified opportunities, and some/all are being realized

### Water

### (3.6.1) Environmental opportunities identified

*Select from:*

☑ Yes, we have identified opportunities, and some/all are being realized

## Biodiversity

### (3.6.1) Environmental opportunities identified

*Select from:*

☑ No

### (3.6.2) Primary reason why your organization does not consider itself to have environmental opportunities

*Select from:*

☑ Evaluation in progress

### (3.6.3) Please explain

*Our evaluation of biodiversity-related opportunities is currently in progress. This is primarily because Gümüştaş, the subsidiary with the most significant potential biodiversity impacts, was only incorporated into Doğan Holding's portfolio in 2024 and does not yet exert a material influence at the Group level. Biodiversity impacts are localized to specific sites and do not pose a substantive financial impact at the Group level when assessed against our 1% Total Asset decrease threshold. We are actively assessing all subsidiaries to identify potential areas where biodiversity-related opportunities could be created and how they can be integrated into our broader sustainability strategy. This assessment is guided by ongoing evaluations, implementation of site-specific rehabilitation plans, environmental monitoring, compliance with applicable regulations, and initiatives to reduce pressures on ecosystems through energy efficiency, waste management, and sustainable operational practices. Our assessment will be completed through the regular review of potential biodiversity-related opportunities across all Group companies within the scope of Doğan Holding's Environmental Policy, and by planning actions to integrate any identified opportunities into our sustainability strategy.*
*[Fixed row]*

## (3.6.1) Provide details of the environmental opportunities identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

## Climate change

### (3.6.1.1) Opportunity identifier

*Select from:*

☑ Opp1

## (3.6.1.3) Opportunity type and primary environmental opportunity driver

Products and services

☑ Increased sales of existing products and services

## (3.6.1.4) Value chain stage where the opportunity occurs

*Select from:*

☑ Direct operations

## (3.6.1.5) Country/area where the opportunity occurs

*Select all that apply*

☑ Turkey

## (3.6.1.8) Organization specific description

*One of our subsidiaries, Galata Wind, operates within the electric utilities sector and has successfully built a fully renewable energy portfolio. With a strong focus on wind and solar energy, Galata Wind generates significant carbon credits as part of its operations. Carbon credits verified by the Gold Standard and VCS-VERRA organizations are issued as Voluntary Carbon Reduction Credit certificates (VER). The increasing demand for carbon credits, particularly from organizations looking to offset their emissions, positions Galata Wind to seize new revenue streams in this growing market. This provides a substantial financial opportunity for Doğan Holding, as we are well-positioned to meet the rising global demand for renewable energy solutions and carbon neutrality.*

## (3.6.1.9) Primary financial effect of the opportunity

*Select from:*

☑ Increased revenues resulting from increased demand for products and services

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

*Select all that apply*

☑ Medium-term

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

*Select from:*

☑ Very likely (90–100%)

## (3.6.1.12) Magnitude

*Select from:*

☑ Medium-low

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

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

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

*Select from:*

☑ Yes

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

*36190000*

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

*72380000*

## (3.6.1.23) Explanation of financial effect figures

*Galata Wind's renewable energy generation has the potential to achieve approximately 490,000 $tCO_2e$ of annual emissions reductions. The company plans to monetize this contribution by issuing Verified Emission Reduction (VER) certificates through internationally recognized standards such as Gold Standard and VCS-VERRA, allowing participation in voluntary carbon markets in medium term. The financial effect is calculated based on an average VER price of €4.5 per $tCO_2e$,*

*reflecting the company's historical sales prices. Accordingly, the potential revenue is estimated using the formula: $tCO_2e$ × €4,5 per ton, translating the expected emissions reductions into monetary value. Results were calculate within the scope of Doğan Holding's shareholding of GalataWind.*

## (3.6.1.24) Cost to realize opportunity

*2470000000*

## (3.6.1.25) Explanation of cost calculation

*Doğan Holding's subsidiary, Galata Wind, currently operates electricity generation facilities with a total installed capacity of 297 MW, and aims to increase this capacity to 354 MW with extension projects to the already operating assets in the year of 2025. These capacity increases not only focus on expanding renewable energy generation but also creates potential for additional revenue through participation in carbon markets. Since the operational assets are already certified through international certification mechanisms such as Gold Standard and VCS-VERRA (Verified Carbon Standard), extension turbines and/or PV panels also have the eligibility to utilize the voluntary carbon markets as long as validation and verification procedures are sustained for emission reductions resulting from renewable energy generation. The realization of this opportunity involves costs related to new capacity investments, certification processes, verification and auditing expenses, and project development. Therefore, the total cost of the planned new installations to realize the opportunity is around 2,320 million TL. Moreover, to continue the validation and verification procedures of the eligible projects until the end of their respective crediting periods (10 years average remaining tenor), an annual operational cost of 15 million TL, including auditing, consultancy, reporting and certification will be required.*

## (3.6.1.26) Strategy to realize opportunity

*Galata Wind plans to realize this opportunity by expanding its installed capacity from the current 297 MW to 354 MW in 2025. For these new capacity expansion, the company will also implement international verification mechanisms such as VCS (Verified Carbon Standard) and Gold Standard to certify emission reductions from renewable energy generation. These additional verified reductions can then be monetized as carbon credits, creating additional revenue streams. The strategy also includes comprehensive project development, risk assessment, and operational planning to ensure timely and cost-efficient realization of both capacity growth and carbon market participation.*

# Water

## (3.6.1.1) Opportunity identifier

*Select from:*

☑ Opp2

## (3.6.1.3) Opportunity type and primary environmental opportunity driver

Reputational capital

☑ Improved ratings by sustainability/ESG indexes

## (3.6.1.4) Value chain stage where the opportunity occurs

*Select from:*

☑ Direct operations

## (3.6.1.5) Country/area where the opportunity occurs

*Select all that apply*

☑ Turkey

## (3.6.1.6) River basin where the opportunity occurs

*Select all that apply*

☑ Other, please specify :All relevant river basins located in Turkiye

## (3.6.1.8) Organization specific description

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

## (3.6.1.9) Primary financial effect of the opportunity

*Select from:*

☑ Other, please specify  :Increased brand value

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

*Select all that apply*

☑ Long-term

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

*Select from:*

☑ More likely than not (50–100%)

## (3.6.1.12) Magnitude

*Select from:*

☑ Medium-low

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

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

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

*Select from:*

☑ Yes

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

*1000000*

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

*3000000*

## (3.6.1.23) Explanation of financial effect figures

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

## (3.6.1.24) Cost to realize opportunity

*500000*

## (3.6.1.25) Explanation of cost calculation

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

## (3.6.1.26) Strategy to realize opportunity

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

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

## Climate change

## (3.6.2.1) Financial metric

*Select from:*
☑ Assets

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

*72380000*

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

*Select from:*
☑ Less than 1%

## (3.6.2.4) Explanation of financial figures

*Financial effect of opportunity is divided into our total assets.*

### Water

## (3.6.2.1) Financial metric

*Select from:*

☑ Revenue

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

*3000000*

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

*Select from:*

☑ Less than 1%

## (3.6.2.4) Explanation of financial figures

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

## C4. Governance

## (4.1) Does your organization have a board of directors or an equivalent governing body?

### (4.1.1) Board of directors or equivalent governing body

*Select from:*

☑ Yes

### (4.1.2) Frequency with which the board or equivalent meets

*Select from:*

☑ More frequently than quarterly

### (4.1.3) Types of directors your board or equivalent is comprised of

*Select all that apply*

☑ Executive directors or equivalent

☑ Non-executive directors or equivalent

☑ Independent non-executive directors or equivalent

### (4.1.4) Board diversity and inclusion policy

*Select from:*

☑ No

*[Fixed row]*

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

## Climate change

## (4.1.1.1) Board-level oversight of this environmental issue

*Select from:*

☑ Yes

### Water

## (4.1.1.1) Board-level oversight of this environmental issue

*Select from:*

☑ Yes

### Biodiversity

## (4.1.1.1) Board-level oversight of this environmental issue

*Select from:*

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

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

*Select from:*

☑ Other, please specify :Madencilik/In progress

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

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

## (4.1.2) Identify the positions (do not include any names) of the individuals or committees on the board with accountability for environmental issues and provide details of the board's oversight of environmental issues.

## Climate change

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

*Select all that apply*

☑ Board chair

☑ Director on board

☑ Chief Executive Officer (CEO)

☑ Board-level committee

### (4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

*Select from:*

☑ Yes

### (4.1.2.3) Policies which outline the positions' accountability for this environmental issue

*Select all that apply*

☑ Board mandate

☑ Individual role descriptions

### (4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

*Select from:*

☑ Scheduled agenda item in some board meetings – at least annually

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

*Select all that apply*

☑ Reviewing and guiding annual budgets

☑ Overseeing and guiding scenario analysis

☑ Overseeing the setting of corporate targets

☑ Monitoring progress towards corporate targets

☑ Overseeing and guiding public policy engagement

☑ Reviewing and guiding innovation/R&D priorities

☑ Approving and/or overseeing employee incentives

☑ Overseeing and guiding major capital expenditures

☑ Approving corporate policies and/or commitments
☑ Overseeing reporting, audit, and verification processes
☑ Monitoring the implementation of a climate transition plan
☑ Overseeing and guiding the development of a business strategy
☑ Overseeing and guiding acquisitions, mergers, and divestitures
☑ Monitoring supplier compliance with organizational requirements
☑ Monitoring compliance with corporate policies and/or commitments
☑ Overseeing and guiding the development of a climate transition plan
☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities
☑ Other, please specify :Overseeing and guiding public policy engagement
☑ Monitoring the implementation of the business strategy

## (4.1.2.7) Please explain

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

# Water

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

*Select all that apply*
☑ Board chair
☑ Director on board
☑ Chief Executive Officer (CEO)
☑ Board-level committee

## (4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

*Select from:*

☑ Yes

## (4.1.2.3) Policies which outline the positions' accountability for this environmental issue

*Select all that apply*

☑ Board mandate

☑ Individual role descriptions

## (4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

*Select from:*

☑ Scheduled agenda item in some board meetings – at least annually

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

*Select all that apply*

☑ Reviewing and guiding annual budgets

☑ Overseeing and guiding scenario analysis

☑ Overseeing the setting of corporate targets

☑ Monitoring progress towards corporate targets

☑ Approving corporate policies and/or commitments

☑ Overseeing reporting, audit, and verification processes

☑ Monitoring the implementation of a climate transition plan

☑ Overseeing and guiding the development of a business strategy

☑ Overseeing and guiding acquisitions, mergers, and divestitures

☑ Monitoring supplier compliance with organizational requirements

☑ Monitoring compliance with corporate policies and/or commitments

☑ Overseeing and guiding the development of a climate transition plan

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

☑ Overseeing and guiding public policy engagement

☑ Reviewing and guiding innovation/R&D priorities

☑ Approving and/or overseeing employee incentives

☑ Overseeing and guiding major capital expenditures

☑ Monitoring the implementation of the business strategy

## (4.1.2.7) Please explain

*Water-related issues are integrated into Doğan Holding's governance framework under the oversight of the same committees responsible for environmental management. This includes monitoring supplier compliance, water efficiency programs, and conservation initiatives in both direct operations and the broader value chain. The board ensures that Doğan Holding's operational water usage complies with global water stewardship standards, with special attention given to regions where water stress is a potential risk. In this context, water-intensive activities in mining operations are closely monitored as part of the corporate risk management framework, with planned mitigation measures such as drilling additional wells to secure water supply. Regular audits and assessments are presented to the board annually, where progress on water-related goals, such as reduction in water use intensity and improved water recycling processes, is reviewed and actioned upon when necessary.*
*[Fixed row]*

## (4.2) Does your organization's board have competency on environmental issues?

## Climate change

### (4.2.1) Board-level competency on this environmental issue

*Select from:*
☑ Yes

### (4.2.2) Mechanisms to maintain an environmentally competent board

*Select all that apply*
☑ Consulting regularly with an internal, permanent, subject-expert working group
☑ Engaging regularly with external stakeholders and experts on environmental issues
☑ Integrating knowledge of environmental issues into board nominating process
☑ Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)
☑ Having at least one board member with expertise on this environmental issue

### (4.2.3) Environmental expertise of the board member

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

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

## Water

### (4.2.1) Board-level competency on this environmental issue

*Select from:*

☑ Yes

### (4.2.2) Mechanisms to maintain an environmentally competent board

*Select all that apply*

☑ Consulting regularly with an internal, permanent, subject-expert working group

☑ Engaging regularly with external stakeholders and experts on environmental issues

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

### (4.2.3) Environmental expertise of the board member

Additional training

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

Experience

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

*[Fixed row]*

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

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

*[Fixed row]*

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

### Climate change

#### (4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Executive Officer (CEO)

#### (4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

☑ Managing engagement in landscapes and/or jurisdictions

☑ Managing public policy engagement related to environmental issues

☑ Managing value chain engagement related to environmental issues

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

☑ Measuring progress towards environmental corporate targets

☑ Setting corporate environmental policies and/or commitments

☑ Setting corporate environmental targets

Strategy and financial planning

☑ Developing a climate transition plan

☑ Implementing a climate transition plan

☑ Conducting environmental scenario analysis

☑ Managing annual budgets related to environmental issues

☑ Implementing the business strategy related to environmental issues

☑ Developing a business strategy which considers environmental issues

☑ Managing acquisitions, mergers, and divestitures related to environmental issues

☑ Managing major capital and/or operational expenditures relating to environmental issues

☑ Managing priorities related to innovation/low-environmental impact products or services (including R&D)

Other

☑ Providing employee incentives related to environmental performance

## (4.3.1.4) Reporting line

*Select from:*

☑ Reports to the board directly

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

*Select from:*

☑ Quarterly

## (4.3.1.6) Please explain

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

# Water

## (4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Executive Officer (CEO)

## (4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

☑ Managing engagement in landscapes and/or jurisdictions

☑ Managing public policy engagement related to environmental issues

☑ Managing value chain engagement related to environmental issues

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

☑ Measuring progress towards environmental corporate targets

☑ Setting corporate environmental policies and/or commitments

☑ Setting corporate environmental targets

Strategy and financial planning

☑ Conducting environmental scenario analysis

☑ Managing annual budgets related to environmental issues

☑ Implementing the business strategy related to environmental issues

☑ Managing acquisitions, mergers, and divestitures related to environmental issues

☑ Managing major capital and/or operational expenditures relating to environmental issues

☑ Managing priorities related to innovation/low-environmental impact products or services (including R&D)

## (4.3.1.4) Reporting line

*Select from:*

☑ Reports to the board directly

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

*Select from:*

☑ Quarterly

## (4.3.1.6) Please explain

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

# Biodiversity

## (4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Executive Officer (CEO)

## (4.3.1.2) Environmental responsibilities of this position

Engagement

☑ Managing engagement in landscapes and/or jurisdictions

☑ Managing public policy engagement related to environmental issues

Policies, commitments, and targets

☑ Setting corporate environmental policies and/or commitments

☑ Setting corporate environmental targets

Strategy and financial planning

☑ Developing a business strategy which considers environmental issues

☑ Managing annual budgets related to environmental issues

☑ Managing major capital and/or operational expenditures relating to environmental issues

☑ Managing priorities related to innovation/low-environmental impact products or services (including R&D)

## (4.3.1.4) Reporting line

*Select from:*

☑ Reports to the board directly

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

*Select from:*

☑ Quarterly

## (4.3.1.6) Please explain

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

## Climate change

### (4.3.1.1) Position of individual or committee with responsibility

Committee

☑ Sustainability committee

### (4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Assessing future trends in environmental dependencies, impacts, risks, and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

☑ Measuring progress towards environmental corporate targets

☑ Setting corporate environmental policies and/or commitments

☑ Setting corporate environmental targets

Strategy and financial planning

☑ Developing a climate transition plan

☑ Implementing a climate transition plan

☑ Conducting environmental scenario analysis

☑ Managing annual budgets related to environmental issues

☑ Implementing the business strategy related to environmental issues

☑ Developing a business strategy which considers environmental issues

☑ Managing environmental reporting, audit, and verification processes

☑ Managing acquisitions, mergers, and divestitures related to environmental issues

☑ Managing major capital and/or operational expenditures relating to environmental issues

☑ Managing priorities related to innovation/low-environmental impact products or services (including R&D)

## (4.3.1.4) Reporting line

*Select from:*

☑ Reports to the board directly

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

*Select from:*

☑ Quarterly

## (4.3.1.6) Please explain

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

# Climate change

## (4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ President

## (4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Assessing future trends in environmental dependencies, impacts, risks, and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

☑ Measuring progress towards environmental corporate targets

☑ Setting corporate environmental policies and/or commitments

☑ Setting corporate environmental targets

Strategy and financial planning

☑ Conducting environmental scenario analysis

☑ Developing a business strategy which considers environmental issues

☑ Developing a climate transition plan

☑ Implementing a climate transition plan

☑ Implementing the business strategy related to environmental issues

Other

☑ Providing employee incentives related to environmental performance

## (4.3.1.4) Reporting line

*Select from:*

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

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

*Select from:*

☑ Quarterly

## (4.3.1.6) Please explain

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

*[Add row]*

## (4.5) Do you provide monetary incentives for the management of environmental issues, including the attainment of targets?

### Climate change

#### (4.5.1) Provision of monetary incentives related to this environmental issue

*Select from:*

☑ Yes

#### (4.5.2) % of total C-suite and board-level monetary incentives linked to the management of this environmental issue

*5*

#### (4.5.3) Please explain

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

### Water

#### (4.5.1) Provision of monetary incentives related to this environmental issue

*Select from:*

☑ Yes

#### (4.5.2) % of total C-suite and board-level monetary incentives linked to the management of this environmental issue

*5*

## (4.5.3) Please explain

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

### Biodiversity

## (4.5.1) Provision of monetary incentives related to this environmental issue

*Select from:*

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

## (4.5.3) Please explain

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

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

### Climate change

## (4.5.1.1) Position entitled to monetary incentive

Board or executive level

☑ Chief Executive Officer (CEO)

## (4.5.1.2) Incentives

*Select all that apply*

☑ Bonus - % of salary

## (4.5.1.3) Performance metrics

Targets

☑ Progress towards environmental targets

☑ Achievement of environmental targets

Strategy and financial planning

☑ Increased investment in environmental R&D and innovation

Emission reduction

☑ Reduction in absolute emissions

## (4.5.1.4) Incentive plan the incentives are linked to

*Select from:*

☑ Both Short-Term and Long-Term Incentive Plan, or equivalent

## (4.5.1.5) Further details of incentives

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

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

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

# Water

## (4.5.1.1) Position entitled to monetary incentive

Board or executive level

☑ Chief Executive Officer (CEO)

## (4.5.1.2) Incentives

*Select all that apply*

☑ Bonus - % of salary

## (4.5.1.3) Performance metrics

Targets

☑ Progress towards environmental targets

☑ Achievement of environmental targets

## (4.5.1.4) Incentive plan the incentives are linked to

*Select from:*

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

## (4.5.1.5) Further details of incentives

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

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

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

## Climate change

### (4.5.1.1) Position entitled to monetary incentive

Senior-mid management

☑ Environment/Sustainability manager

### (4.5.1.2) Incentives

*Select all that apply*

☑ Bonus - % of salary

### (4.5.1.3) Performance metrics

Targets

☑ Progress towards environmental targets

☑ Achievement of environmental targets

Strategy and financial planning

☑ Increased investment in environmental R&D and innovation

Emission reduction

☑ Reduction in absolute emissions

### (4.5.1.4) Incentive plan the incentives are linked to

*Select from:*

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

### (4.5.1.5) Further details of incentives

*The remuneration structure of the Vice President of Corporate Communications and Sustainability includes performance-based criteria directly linked to environmental and social goals. These criteria cover the implementation of the sustainability strategy, achievement of set targets, contribution to group-wide*

*sustainability practices, and the effectiveness of reporting. By integrating these measurable outcomes into compensation, the company ensures that the management of environmental issues is aligned with overall performance and accountability.*

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

*The incentives of the Vice President of Corporate Communications and Sustainability are directly tied to the implementation of Doğan Holding's sustainability strategy. By achieving defined KPIs, including effective execution of sustainability initiatives across group companies, enhanced reporting processes, and progress on environmental and social targets, the Vice President ensures alignment with the Group's broader ESG objectives. This incentivizes the Vice President to actively drive measurable impact and strengthen the Group's commitment to responsible and sustainable business practices.*

# Water

## (4.5.1.1) Position entitled to monetary incentive

Senior-mid management

☑ Environment/Sustainability manager

## (4.5.1.2) Incentives

*Select all that apply*

☑ Bonus - % of salary

## (4.5.1.3) Performance metrics

Targets

☑ Progress towards environmental targets

☑ Achievement of environmental targets

## (4.5.1.4) Incentive plan the incentives are linked to

*Select from:*

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

## (4.5.1.5) Further details of incentives

*The incentive is linked to performance indicators on water resource management, such as the adoption of water efficiency initiatives and advancements in sustainable consumption practices across Doğan Holding's operations. The bonus, determined as a percentage of the Vice President's annual salary, is contingent upon the effective delivery of water-related projects and the mitigation of water risks in critical business areas.*

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

*The incentive drives sustainable water management and conservation across the Group-wide operations of Doğan Holding. It encompasses the implementation of water recycling and reuse technologies, adherence to water conservation regulations, and the reduction of operational water consumption, thereby supporting the Group's broader strategy to protect and preserve water resources.*

# Climate change

## (4.5.1.1) Position entitled to monetary incentive

Facility/Unit/Site management

☑ Business unit manager

## (4.5.1.2) Incentives

*Select all that apply*

☑ Bonus - % of salary

## (4.5.1.3) Performance metrics

Targets

☑ Progress towards environmental targets

☑ Achievement of environmental targets

☑ Organization performance against an environmental sustainability index

## (4.5.1.4) Incentive plan the incentives are linked to

*Select from:*

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

## (4.5.1.5) Further details of incentives

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

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

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

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

| | Does your organization have any environmental policies? |
|---|---|
| | *Select from:*<br>☑ Yes |

*[Fixed row]*

# (4.6.1) Provide details of your environmental policies.

## Row 1

## (4.6.1.1) Environmental issues covered

*Select all that apply*

☑ Climate change

☑ Water

☑ Biodiversity

## (4.6.1.2) Level of coverage

*Select from:*

☑ Organization-wide

## (4.6.1.3) Value chain stages covered

*Select all that apply*

☑ Direct operations

☑ Upstream value chain

☑ Downstream value chain

## (4.6.1.4) Explain the coverage

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

## (4.6.1.5) Environmental policy content

Environmental commitments

☑ Commitment to comply with regulations and mandatory standards

☑ Commitment to take environmental action beyond regulatory compliance

☑ Commitment to stakeholder engagement and capacity building on environmental issues

Water-specific commitments

☑ Commitment to reduce water consumption volumes

Social commitments

☑ Commitment to promote gender equality and women’s empowerment

☑ Commitment to respect internationally recognized human rights

### (4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

*Select all that apply*

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

### (4.6.1.7) Public availability

*Select from:*

☑ Publicly available

### (4.6.1.8) Attach the policy

*dogan-holding-sustainability-policy.pdf*
*[Add row]*

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

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

*Select from:*

☑ Yes

### (4.10.2) Collaborative framework or initiative

*Select all that apply*

☑ UN Global Compact

☑ Other, please specify :Turkish Industry and Business Association / Relevant Working Groups (Capital Markets Working Group, Environment and Climate Change Working Group) The Principles for Responsible Investment (The PRI)

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

*We're active members and contributors on the following groups, frameworks, initiatives and regularly share our comment related to environmental issues. UN Global Compact: Doğan Holding is a signatory of the UN Global Compact, committing to its Ten Principles on human rights, labor, environment, and anti-corruption. As part of our engagement, we actively contribute to the environmental dimension of the Global Compact, focusing on Sustainable Development Goal (SDG) 13: Climate Action. We regularly submit our Communication on Progress (CoP), which outlines our actions and advancements in addressing climate-related challenges. Furthermore, we participate in various working groups and high-level dialogues to share best practices, offer insights on integrating sustainable policies into business strategies, and engage in collaborative efforts to accelerate the achievement of global environmental goals. Turkish Industry and Business Association (TÜSİAD) / Capital Markets Working Group, Environment and Climate Change Working Group: Doğan Holding plays a prominent role within TÜSİAD's Environment and Climate Change Working Group, contributing to national-level policy discussions aimed at shaping Turkey’s environmental legislation. We engage in sectoral working groups that analyze the impact of regulatory frameworks on business operations and identify opportunities for enhancing Turkey's alignment with international environmental standards. Through these forums, we have provided industry-specific insights on the transition towards a low-carbon economy, helping to draft recommendations and action plans that support sustainable business practices. Our participation also includes collaboration on white papers and research that influence public and private sector decision-making in sustainability. World Business Council for Sustainable Development (WBCSD) Turkey: As an active member of WBCSD Turkey, Doğan Holding engages with like-minded businesses to accelerate the transition to a sustainable economy. We contribute to several initiatives that focus on reducing environmental footprints, fostering sustainable innovation, and promoting resource efficiency. Our participation includes co-developing case studies and sector-specific sustainability benchmarks that assist other companies in setting more ambitious environmental targets. Additionally, we share our sustainability journey in various WBCSD working groups, offering transparency into our efforts to decarbonize operations, reduce water usage, and promote biodiversity across our value chain. Doğan Holding has signed the Principles for Responsible Investment (The PRI), reaffirming its commitment to effectively managing environmental, social, and governance (ESG) risks and creating long-term sustainable value. In this context, we continue our determination to integrate these principles into all our investment strategies while advancing our responsible investment approach in line with global best practices. In 2024, we also completed our first PRI reporting, reflecting the progress of our responsible investment practices, including the integration of ESG criteria into asset management processes.*
*[Fixed row]*

# (4.11) In the reporting year, did your organization engage in activities that could directly or indirectly influence policy, law, or regulation that may (positively or negatively) impact the environment?

## (4.11.1) External engagement activities that could directly or indirectly influence policy, law, or regulation that may impact the environment

*Select all that apply*

☑ Yes, we engaged directly with policy makers

## (4.11.2) Indicate whether your organization has a public commitment or position statement to conduct your engagement activities in line with global environmental treaties or policy goals

*Select from:*

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

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

*Select from:*

☑ No

## (4.11.8) Describe the process your organization has in place to ensure that your external engagement activities are consistent with your environmental commitments and/or transition plan

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

# (4.11.1) On what policies, laws, or regulations that may (positively or negatively) impact the environment has your organization been engaging directly with policy makers in the reporting year?

## Row 1

## (4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

*TSRS (Türkiye Sustainability Reporting Standards)*

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

*Select all that apply*

☑ Climate change

☑ Water

## (4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Transparency and due diligence

☑ Transparency requirements

☑ Verification and audits

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

*Select from:*

☑ National

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

*Select all that apply*

☑ Turkey

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

*Select from:*

☑ Support with no exceptions

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

*Select all that apply*

☑ Regular meetings

☑ Participation in working groups organized by policy makers

☑ Submitting written proposals/inquiries

## (4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

*0*

## (4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

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

## (4.11.1.11) Indicate if you have evaluated whether your organization’s engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

*Select from:*

☑ Yes, we have evaluated, and it is aligned

## (4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

*Select all that apply*

☑ Paris Agreement

☑ Sustainable Development Goal 6 on Clean Water and Sanitation

*[Add row]*

## (4.12) Have you published information about your organization’s response to environmental issues for this reporting year in places other than your CDP response?

*Select from:*
☑ Yes

## (4.12.1) Provide details on the information published about your organization’s response to environmental issues for this reporting year in places other than your CDP response. Please attach the publication.

### Row 1

### (4.12.1.1) Publication

*Select from:*
☑ In mainstream reports, in line with environmental disclosure standards or frameworks

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

*Select all that apply*
☑ GRI

### (4.12.1.3) Environmental issues covered in publication

*Select all that apply*
☑ Climate change
☑ Water
☑ Biodiversity

### (4.12.1.4) Status of the publication

*Select from:*
☑ Underway - previous year attached

## (4.12.1.5) Content elements

*Select all that apply*

☑ Strategy
☑ Governance
☑ Emission targets
☑ Emissions figures
☑ Risks & Opportunities
☑ Value chain engagement
☑ Dependencies & Impacts
☑ Public policy engagement
☑ Water accounting figures
☑ Content of environmental policies

## (4.12.1.6) Page/section reference

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

## (4.12.1.7) Attach the relevant publication

*DOHOL_sustainability-report-2023.pdf*

## (4.12.1.8) Comment

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

## C5. Business strategy

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

### Climate change

### (5.1.1) Use of scenario analysis

*Select from:*
☑ Yes

### (5.1.2) Frequency of analysis

*Select from:*
☑ Annually

### Water

### (5.1.1) Use of scenario analysis

*Select from:*
☑ Yes

### (5.1.2) Frequency of analysis

*Select from:*
☑ Annually
*[Fixed row]*

## (5.1.1) Provide details of the scenarios used in your organization’s scenario analysis.

### Climate change

## (5.1.1.1) Scenario used

Climate transition scenarios

☑ IEA NZE 2050

## (5.1.1.3) Approach to scenario

*Select from:*

☑ Qualitative and quantitative

## (5.1.1.4) Scenario coverage

*Select from:*

☑ Organization-wide

## (5.1.1.5) Risk types considered in scenario

*Select all that apply*

☑ Policy

☑ Market

☑ Reputation

☑ Technology

☑ Liability

## (5.1.1.6) Temperature alignment of scenario

*Select from:*

☑ 1.5°C or lower

## (5.1.1.7) Reference year

*2024*

## (5.1.1.8) Timeframes covered

*Select all that apply*

☑ 2030

☑ 2040

☑ 2050

## (5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Climate change (one of five drivers of nature change)

Finance and insurance

☑ Cost of capital

Regulators, legal and policy regimes

☑ Global regulation

☑ Level of action (from local to global)

☑ Global targets

Direct interaction with climate

☑ On asset values, on the corporate

Macro and microeconomy

☑ Domestic growth

☑ Globalizing markets

## (5.1.1.10) Assumptions, uncertainties and constraints in scenario

*This scenario assumes that advanced economies will achieve net zero before 2050 and presents an emissions trajectory consistent with a 50% likelihood of limiting global warming to 1.5°C without overshoot. The pathway is designed to balance technological viability, economic efficiency, and social acceptance, while supporting continued economic growth and secure energy supply. In assessing risks and opportunities, we apply consistent short-, medium-, and long-term horizons across our climate scenario analysis.*

## (5.1.1.11) Rationale for choice of scenario

*The NZE2050 Scenario serves as a strategic reference point for evaluating how evolving regulations, financial trends, and market dynamics may affect Doğan Holding's portfolio companies. It allows us to anticipate the types of risks our businesses could face in a net-zero transition, while also identifying new areas of growth linked to the rising demand for low-carbon solutions. By embedding this scenario into our strategic planning, we aim to enhance the resilience of our group companies to transition risks and ensure they are well positioned to seize opportunities in a rapidly decarbonizing global economy.*

# Water

## (5.1.1.1) Scenario used

Water scenarios

☑ WRI Aqueduct

## (5.1.1.3) Approach to scenario

*Select from:*

☑ Qualitative and quantitative

## (5.1.1.4) Scenario coverage

*Select from:*

☑ Organization-wide

## (5.1.1.5) Risk types considered in scenario

*Select all that apply*

☑ Acute physical

☑ Chronic physical

## (5.1.1.7) Reference year

*2024*

## (5.1.1.8) Timeframes covered

*Select all that apply*

☑ 2030

☑ 2040

☑ 2050

## (5.1.1.9) Driving forces in scenario

Finance and insurance

☑ Cost of capital

Regulators, legal and policy regimes

☑ Global regulation

☑ Level of action (from local to global)

☑ Global targets

Direct interaction with climate

☑ On asset values, on the corporate

Macro and microeconomy

☑ Domestic growth

☑ Globalizing markets

## (5.1.1.10) Assumptions, uncertainties and constraints in scenario

*Our scenario analysis is informed by widely recognized scientific sources and methodologies, including the World Resources Institute (WRI), the IEA and the IPCC. The analysis is based on several assumptions, such as the alignment of global climate policies with the Paris Agreement, ongoing technological progress in low-carbon and renewable energy solutions, increasing demand for sustainable products and services, and the gradual expansion of carbon pricing and regulatory frameworks across regions. We acknowledge uncertainties, including the timing and stringency of policy adoption, the pace and cost of technology deployment, volatility in global energy and commodity markets, and regional or sectoral variations in climate impacts. The analysis is also subject to constraints. These include limited data availability, the fact that global scenarios may not fully reflect local or regional realities. Despite these limitations, the scenario analysis provides valuable insights that support Doğan Holding's strategic planning, investment priorities, and risk management processes.*

## (5.1.1.11) Rationale for choice of scenario

*WRI's frameworks provide a structured approach to identifying both transition and physical risks, while enabling comparability across sectors and geographies. By adopting scenarios such as the IEA NZE2050 and RCP 4.5, and RCP 8.5 pathways within the WRI framework, we ensure that our analysis is grounded in credible, science-based projections. These scenarios were chosen because they capture a wide spectrum of possible outcomes, ranging from orderly net-zero transitions to high-emissions futures with severe physical risks. The WRI approach supports the integration of these scenarios into decision-making processes across Doğan Holding's portfolio companies. This allows us to evaluate implications for investment decisions, capital allocation, and supply chain resilience, particularly in sectors that are highly exposed to climate change*

# Climate change

## (5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 4.5

## (5.1.1.2) Scenario used SSPs used in conjunction with scenario

*Select from:*

☑ SSP2

## (5.1.1.3) Approach to scenario

*Select from:*

☑ Qualitative and quantitative

## (5.1.1.4) Scenario coverage

*Select from:*

☑ Organization-wide

## (5.1.1.5) Risk types considered in scenario

*Select all that apply*

☑ Acute physical
☑ Chronic physical

## (5.1.1.6) Temperature alignment of scenario

*Select from:*
☑ 2.0ºC - 2.4ºC

## (5.1.1.7) Reference year

*2024*

## (5.1.1.8) Timeframes covered

*Select all that apply*
☑ 2030
☑ 2040
☑ 2050

## (5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts
☑ Climate change (one of five drivers of nature change)

Finance and insurance
☑ Cost of capital

Regulators, legal and policy regimes
☑ Global regulation
☑ Level of action (from local to global)
☑ Global targets

Direct interaction with climate
☑ On asset values, on the corporate

Macro and microeconomy

☑ Domestic growth

☑ Globalizing markets

## (5.1.1.10) Assumptions, uncertainties and constraints in scenario

*Assumptions: The primary assumption is that Doğan Holding's group companies will continue to assess climate-related risks and opportunities by utilizing internationally recognized scenarios such as RCP 4.5. Under RCP 4.5, gradual progress toward a low-carbon economy is assumed, creating strategic opportunities in renewable energy, energy efficiency, and stakeholder engagement. Uncertainties: The key uncertainties involve the timeline and speed at which regulatory, market, and technological developments evolve, as well as the extent to which these external drivers will affect Doğan Holding's business lines differently. Additional uncertainties also stem from how transition dynamics under RCP 4.5 and heightened physical risks under RCP 8.5 will shape the group's future risk and opportunity landscape. Constraints: The primary constraint is the current absence of formal alignment with the Science Based Targets initiative (SBTi), as the group is in the process of evaluating the most suitable pathway for commitment. Nonetheless, scenario analysis under RCP pathways enables the group to integrate climate-related considerations into strategic planning, even prior to a formal SBTi commitment. Additional constraints arise from the complexity of integrating diverse sectoral strategies within Doğan Holding's broad business portfolio, which makes immediate group-level assessments challenging. Furthermore, the interdependencies between environmental risks such as energy transition costs and water management require careful scenario modeling under both optimistic (RCP 4.5) and pessimistic (RCP 8.5) conditions*

## (5.1.1.11) Rationale for choice of scenario

*The rationale for choosing the IPCC Representative Concentration Pathways (RCPs) as the background scenarios for group-wide climate strategy is to ground our analysis in globally recognized, science-based climate pathways used across international assessments. Using RCP 4.5 provides a credible and comparable framework to evaluate both transition dynamics and escalating physical climate risks, supporting Doğan Holding's enterprise-level planning and resilience. Additionally, this alignment ensures that Doğan Holding's decarbonization pathway is robust, externally validated, and consistent with the methodological expectations of TSRS for forward-looking climate analysis across our group companies and operations. These scenarios provide a robust basis for our group companies to transition toward low-carbon strategies while identifying long-term climate risks and opportunities. By adhering to the IPCC's scientific projections and time horizons, we ensure that our climate-related strategies are not only aligned with the most credible climate models but also with evolving global policies. This choice allows Doğan Holding to remain competitive and mitigate financial and operational risks associated with climate change, as we integrate RCP-based insights into our broader sustainability strategy and risk management.*

# Climate change

## (5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 8.5

## (5.1.1.2) Scenario used SSPs used in conjunction with scenario

*Select from:*

☑ SSP5

## (5.1.1.3) Approach to scenario

*Select from:*

☑ Qualitative and quantitative

## (5.1.1.4) Scenario coverage

*Select from:*

☑ Organization-wide

## (5.1.1.5) Risk types considered in scenario

*Select all that apply*

☑ Acute physical

☑ Chronic physical

## (5.1.1.6) Temperature alignment of scenario

*Select from:*

☑ 4.0ºC and above

## (5.1.1.7) Reference year

*2024*

## (5.1.1.8) Timeframes covered

*Select all that apply*

☑ 2030

☑ 2040

☑ 2050

## (5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Climate change (one of five drivers of nature change)

Finance and insurance

☑ Cost of capital

Regulators, legal and policy regimes

☑ Global regulation

☑ Level of action (from local to global)

☑ Global targets

Direct interaction with climate

☑ On asset values, on the corporate

Macro and microeconomy

☑ Domestic growth

☑ Globalizing markets

## (5.1.1.10) Assumptions, uncertainties and constraints in scenario

*Assumptions: The primary assumption is that Doğan Holding's group companies will continue to assess climate-related risks and opportunities by utilizing internationally recognized scenarios such as RCP 8.5. Under RCP 8.5, limited climate policy action and increased fossil fuel dependency are assumed, leading to significant exposure to physical risks such as water stress, supply chain disruptions, and operational interruptions. Uncertainties: The key uncertainties involve the timeline and speed at which regulatory, market, and technological developments evolve, as well as the extent to which these external drivers will affect Doğan Holding's business lines differently. Additional uncertainties also stem from how transition dynamics under RCP 4.5 and heightened physical risks under RCP 8.5 will shape the group's future risk and opportunity landscape. Constraints: The primary constraint is the current absence of formal alignment with the Science Based Targets initiative (SBTi), as the group is in the process of evaluating the most suitable pathway for commitment. Nonetheless, scenario analysis under RCP pathways*

*enables the group to integrate climate-related considerations into strategic planning, even prior to a formal SBTi commitment. Additional constraints arise from the complexity of integrating diverse sectoral strategies within Doğan Holding's broad business portfolio, which makes immediate group-level assessments challenging. Furthermore, the interdependencies between environmental risks—such as energy transition costs and water management—careful scenario modeling under pessimistic (RCP 8.5) conditions.*

### (5.1.1.11) Rationale for choice of scenario

*The rationale for choosing the IPCC Representative Concentration Pathways (RCPs) as the background scenarios for group-wide climate strategy is to ground our analysis in globally recognized, science-based climate pathways used across international assessments. Using RCP 8.5 provides a credible and comparable framework to evaluate both transition dynamics and escalating physical climate risks, supporting Doğan Holding's enterprise-level planning and resilience. Additionally, this alignment ensures that Doğan Holding's decarbonization pathway is robust, externally validated, and consistent with the methodological expectations of TSRS for forward-looking climate analysis across our group companies and operations. These scenarios provide a robust basis for our group companies to transition toward low-carbon strategies while identifying long-term climate risks and opportunities. By adhering to the IPCC's scientific projections and time horizons, we ensure that our climate-related strategies are not only aligned with the most credible climate models but also with evolving global policies. This choice allows Doğan Holding to remain competitive and mitigate financial and operational risks associated with climate change, as we integrate RCP-based insights into our broader sustainability strategy and risk management.*
*[Add row]*

## (5.1.2) Provide details of the outcomes of your organization's scenario analysis.

## Climate change

### (5.1.2.1) Business processes influenced by your analysis of the reported scenarios

*Select all that apply*

☑ Risk and opportunities identification, assessment and management

☑ Strategy and financial planning

☑ Resilience of business model and strategy

☑ Capacity building

☑ Target setting and transition planning

### (5.1.2.2) Coverage of analysis

*Select from:*

☑ Organization-wide

## (5.1.2.3) Summarize the outcomes of the scenario analysis and any implications for other environmental issues

*The scenario analysis outcomes indicate that climate change poses both risks and opportunities for our business operations and long-term sustainability efforts. The analysis, based on the IEA NZE 2050 and IPCC's Representative Concentration Pathways (RCP 4.5 and RCP 8.5) has informed our strategy by highlighting the need for resilience-building measures within our business model. Under RCP 4.5, moderate transition risks are expected and under RCP 8.5, the focus shifts to heightened physical risks such as extreme weather events, water stress, and supply chain disruptions. We have identified key areas where risk management processes need to be adjusted and proactive measures adopted to mitigate the physical and transition risks associated with climate change. The analysis has also driven our understanding of the potential opportunities, particularly in areas of energy efficiency and renewable energy adoption. For example, the transition towards renewable energy sources in our operations and across our value chain is now seen as an area for significant investment, aligning with national and international climate goals. Quantitative assessments have been integrated into the analysis, including modeling the financial implications of physical risks such as floods, storms, and droughts, alongside transition risks such as regulatory changes and carbon pricing. These findings will guide the organization's strategic decisions, especially related to capital expenditures, R&D in clean technology, and further integration of climate-related targets with our financial planning. The scenario analysis outcomes have directly contributed to strategic decisions by reinforcing the need to enhance our business resilience to climate change. These insights are shaping our investment decisions, guiding adjustments in our supply chain processes, and informing measures to strengthen the long-term adaptability of our business model.*

# Water

## (5.1.2.1) Business processes influenced by your analysis of the reported scenarios

*Select all that apply*

☑ Risk and opportunities identification, assessment and management

☑ Strategy and financial planning

☑ Resilience of business model and strategy

☑ Capacity building

☑ Target setting and transition planning

## (5.1.2.2) Coverage of analysis

*Select from:*

☑ Organization-wide

## (5.1.2.3) Summarize the outcomes of the scenario analysis and any implications for other environmental issues

*The scenario analysis conducted under the World Resources Institute (WRI) framework indicates that climate change creates both material risks and emerging opportunities for our business operations and long-term sustainability strategy. Applying WRI's structured approach has enabled us to identify areas where risk management processes need enhancement and to adopt proactive measures to mitigate these risks. At the same time, the analysis reveals opportunities in energy*

*efficiency, renewable energy deployment, and low-carbon innovation, positioning our group companies to align with both national and international climate goals. Quantitative assessments, including the financial implications of floods, storms, droughts, and regulatory transitions, have been integrated into the process. Beyond climate-related impacts, the WRI-based scenario analysis has implications for other environmental issues such as water stewardship, biodiversity, and land use, given their interconnection with climate change. These insights are shaping our capital allocation, investment priorities, and R&D in clean technologies, while also guiding supply chain strategies to strengthen long-term adaptability and resilience across Doğan Holding's operations.*
*[Fixed row]*

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

### (5.2.1) Transition plan

*Select from:*

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

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

*Select from:*

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

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

*Our business strategy is directly linked with our sustainability vision & strategy "Doğan Impact Plan". One of the major objectives of Doğan Impact Plan is becoming carbon neutral in operations (Scope 1+2) of our group companies as of 2030. We monitor the implementation & performance of Doğan Impact Plan's targets including the afformentioned climate target annually starting in the financial planning phase of our group companies. We review and guide our business strategy, major plans of action, risk management practices and business plans with this state in mind. In addition to this, major capital expenditures, acquisitions & divestitures are considered by our executives in compliance with our climate target directly linked to our business strategy. Although our strategy has been influenced by the possible impacts of climate-related risks and opportunities, it is not yet tested with science based climate facts (e.g., 1.5°C degree pathways, scenario analysis etc.) We're accelarating our efforts to align Doğan Impact Plan's climate target with science based criteria and develop a solid transition plan in the upcoming reporting years.*
*[Fixed row]*

## (5.3) Have environmental risks and opportunities affected your strategy and/or financial planning?

### (5.3.1) Environmental risks and/or opportunities have affected your strategy and/or financial planning

*Select from:*

☑ Yes, both strategy and financial planning

## (5.3.2) Business areas where environmental risks and/or opportunities have affected your strategy

*Select all that apply*

☑ Products and services

☑ Upstream/downstream value chain

☑ Investment in R&D

☑ Operations

*[Fixed row]*

## (5.3.1) Describe where and how environmental risks and opportunities have affected your strategy.

## Products and services

## (5.3.1.1) Effect type

*Select all that apply*

☑ Risks

☑ Opportunities

## (5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

*Select all that apply*

☑ Climate change

☑ Water

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

*Doğan Group's products and services face both risks and opportunities as a result of climate change and water-related challenges. In the energy sector, for example, there is an urgent need to transition from traditional fossil fuel-based energy to cleaner, renewable sources such as solar and wind energy. This shift is driven not only by regulatory pressures to reduce carbon emissions but also by growing market demand for sustainable energy solutions. This presents Doğan with the opportunity to*

*position itself as a leader in Türkiye's energy transition, capitalizing on investments in solar power and potentially expanding into new renewable technologies. In the automotive sector, Doğan Group is responding to rising consumer expectations for environmentally friendly products, including electric vehicles (EVs). The Group's strategic focus on developing or partnering with manufacturers of electric and hybrid vehicles represents both an opportunity to capture market share in the growing EV market and a risk if the transition to low-carbon transportation solutions is not adequately prioritized. Water management, particularly in production processes, is also increasingly becoming a significant factor in the lifecycle of the products, which could impact both the costs and feasibility of large-scale production over time. By proactively addressing these risks and seizing the opportunities through investments in sustainable technologies, Doğan Group is ensuring that its products remain relevant in an increasingly environmentally conscious market.*

### Upstream/downstream value chain

## (5.3.1.1) Effect type

*Select all that apply*

☑ Risks

☑ Opportunities

## (5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

*Select all that apply*

☑ Climate change

☑ Water

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

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

## Investment in R&D

### (5.3.1.1) Effect type

*Select all that apply*

☑ Risks

☑ Opportunities

### (5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

*Select all that apply*

☑ Climate change

☑ Water

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

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

## Operations

### (5.3.1.1) Effect type

*Select all that apply*

☑ Risks

☑ Opportunities

## (5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

*Select all that apply*

☑ Climate change

☑ Water

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

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

*[Add row]*

## (5.3.2) Describe where and how environmental risks and opportunities have affected your financial planning.

### Row 1

## (5.3.2.1) Financial planning elements that have been affected

*Select all that apply*

☑ Assets

☑ Revenues

☑ Liabilities

☑ Direct costs

☑ Indirect costs

☑ Access to capital

☑ Capital expenditures

☑ Acquisitions and divestments

## (5.3.2.2) Effect type

*Select all that apply*

☑ Risks

☑ Opportunities

## (5.3.2.3) Environmental issues relevant to the risks and/or opportunities that have affected these financial planning elements

*Select all that apply*

☑ Climate change

☑ Water

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

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

# (5.4) In your organization's financial accounting, do you identify spending/revenue that is aligned with your organization's climate transition?

| | Identification of spending/revenue that is aligned with your organization's climate transition |
|---|---|
| | *Select from:*<br>☑ No, but we plan to in the next two years |

*[Fixed row]*

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

### (5.9.1) Water-related CAPEX (+/- % change)

*10*

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

*15*

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

*5*

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

*10*

### (5.9.5) Please explain

*In the reporting year, water-related CAPEX increased due to investments in wastewater treatment upgrades and water recycling systems at our industrial facilities. We anticipate a further increase in the next year as new projects, including closed-loop water systems and stormwater management infrastructure, are planned.*

*OPEX rose moderately due to higher maintenance and monitoring costs, as well as expanded water quality testing programs. Going forward, we expect OPEX to continue to rise in line with regulatory requirements and our broader sustainability commitments.*
*[Fixed row]*

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

### (5.10.1) Use of internal pricing of environmental externalities

*Select from:*

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

### (5.10.3) Primary reason for not pricing environmental externalities

*Select from:*

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

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

*We do not utilize internal pricing for environmental externalities, such as carbon pricing. However, we recognize the importance of this tool in assessing environmental risks and opportunities. As part of our ongoing sustainability strategy, we are planning to implement an internal carbon pricing mechanism within the next two years. This will help us better evaluate potential cost implications, drive efficiencies, and prepare for future regulatory or market changes related to carbon emissions.*
*[Fixed row]*

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

## Suppliers

### (5.11.1) Engaging with this stakeholder on environmental issues

*Select from:*

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

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

*Select from:*

☑ Not an immediate strategic priority

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

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

### Customers

## (5.11.1) Engaging with this stakeholder on environmental issues

*Select from:*

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

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

*Select from:*

☑ Not an immediate strategic priority

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

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

### Investors and shareholders

## (5.11.1) Engaging with this stakeholder on environmental issues

*Select from:*

☑ Yes

## (5.11.2) Environmental issues covered

*Select all that apply*

☑ Climate change

☑ Water

## Other value chain stakeholders

### (5.11.1) Engaging with this stakeholder on environmental issues

*Select from:*

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

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

*Select from:*

☑ Not an immediate strategic priority

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

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

## (5.11.9) Provide details of any environmental engagement activity with other stakeholders in the value chain.

## Climate change

### (5.11.9.1) Type of stakeholder

*Select from:*

☑ Investors and shareholders

### (5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Share information on environmental initiatives, progress and achievements

## (5.11.9.3) % of stakeholder type engaged

*Select from:*

☑ 100%

## (5.11.9.4) % stakeholder-associated scope 3 emissions

*Select from:*

☑ Less than 1%

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

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

## (5.11.9.6) Effect of engagement and measures of success

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

# Water

## (5.11.9.1) Type of stakeholder

*Select from:*

☑ Investors and shareholders

## (5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Share information on environmental initiatives, progress and achievements

## (5.11.9.3) % of stakeholder type engaged

*Select from:*

☑ 100%

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

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

## (5.11.9.6) Effect of engagement and measures of success

*The effectiveness of our water-related disclosures is measured by the confidence investors place in our water stewardship and its alignment with their own sustainability criteria. This has led to a stronger perception of Doğan Holding as a responsible and forward-thinking organization, positively impacting our investor base. Success is gauged through enhanced investor relations, compliance with water management regulations, and the degree to which our water conservation initiatives are recognized as critical to the long-term viability of our business. Achieving measurable improvements in water efficiency and resilience against water scarcity risks are further indicators of success.*

*[Add row]*

# C6. Environmental Performance - Consolidation Approach

## (6.1) Provide details on your chosen consolidation approach for the calculation of environmental performance data.

### Climate change

#### (6.1.1) Consolidation approach used

*Select from:*

☑ Financial control

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

*Under the financial control approach, we report emissions from operations where Doğan Holding has the ability to direct financial and operating policies, typically through majority ownership or control. This ensures that emissions accounting is consistent with our financial reporting boundaries and provides a comprehensive view of climate-related impacts across the Group. By applying this approach, we can align environmental reporting with financial accountability, thereby ensuring that climate-related risks and opportunities are integrated into strategic and investment decisions.*

### Water

#### (6.1.1) Consolidation approach used

*Select from:*

☑ Financial control

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

*Financial control allows us to report water usage from operations where Doğan Holding has the ability to direct financial and operating policies, typically through majority ownership or control. This approach ensures that water accounting is consistent with our financial reporting boundaries and provides a comprehensive view of water dependencies, risks, and impacts across the Group.*

### Plastics

## (6.1.1) Consolidation approach used

*Select from:*

☑ Financial control

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

*We apply the financial control approach to plastic production, usage, and waste management strategies in operations where Doğan Holding has the ability to direct financial and operating policies, typically through majority ownership or control. This enables us to consistently track progress in reducing plastic packaging and increasing recycling rates across the Group, ensuring alignment between environmental reporting and financial accountability.*

# Biodiversity

## (6.1.1) Consolidation approach used

*Select from:*

☑ Financial control

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

*As we are currently building know-how and expertise related to biodiversity and nature-related financial disclosures, we apply the financial control approach for consistency with our broader non-financial reporting practices. This ensures that biodiversity-related data will be consolidated in line with our financial reporting boundaries once disclosures are fully integrated. Using this approach provides a clear basis for expanding our reporting scope in the coming years and aligning biodiversity considerations with our Group-level accountability and decision-making processes.*
*[Fixed row]*

# C7. Environmental performance - Climate Change

## (7.1) Is this your first year of reporting emissions data to CDP?

*Select from:*

☑ No

## (7.1.1) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?

### (7.1.1.1) Has there been a structural change?

*Select all that apply*

☑ Yes, an acquisition

☑ Yes, a divestment

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

*Acquisition: Gümüştaş Madencilik ve Ticaret A.Ş, Doku Madencilik ve Ticaret A.Ş. Completion Date: 11.09.2024 Divestment: Doğan Burda Dergi Yayıncılık ve Pazarlama A.Ş. Doğan Doğan Müzik Yapım ve Ticaret A.Ş., NetD Müzik Video Dijital Platform ve Ticaret A.Ş. Completion Date: 25.09.2024*

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

*In the reporting year 2024, Doğan Holding completed significant structural changes. On 11 September 2024, the Group acquired 75% of the shares of Gümüştaş Madencilik ve Ticaret A.Ş. and Doku Madencilik ve Ticaret A.Ş. In addition, divestments were realized: on 18 September 2024, Doğan Burda Dergi Yayıncılık ve Pazarlama A.Ş. was divested, and on 25 September 2024, Doğan Doğan Müzik Yapım ve Ticaret A.Ş. (“DMC”) and NetD Müzik Video Dijital Platform ve Ticaret A.Ş. (“NetD Müzik”) were divested from the Group.*
*[Fixed row]*

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

### (7.1.2.1) Change(s) in methodology, boundary, and/or reporting year definition?

*Select all that apply*

☑ Yes, a change in methodology

### (7.1.2.2) Details of methodology, boundary, and/or reporting year definition change(s)

*To comply with new reporting requirements (IFRS S2-TSRS), we have adopted the financial control approach, which provides more accurate and comprehensive reporting and ensures comparability across our diverse portfolio. In line with this approach, our 2023 emission figures were recalculated to present consistent and comparable data for both historical and current performance. Furthermore, as last year's emission figures had been submitted to CDP prior to the audit process and certain errors were identified, these have been corrected, and the recalculated, updated values are now reported.*
*[Fixed row]*

## (7.1.3) Have your organization’s base year emissions and past years’ emissions been recalculated as a result of any changes or errors reported in 7.1.1 and/or 7.1.2?

### (7.1.3.1) Base year recalculation

*Select from:*

☑ No, because the operations acquired or divested did not exist in the base year

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

*Our policy is to recalculate when structural changes, methodology changes, or error corrections cause more than a 5% change in base year emissions. Although our portfolio has changed due to acquisitions and divestments in 2024, these entities were not within our operations in the base year. Therefore, base year emissions have not been recalculated.*

### (7.1.3.4) Past years’ recalculation

*Select from:*

☑ No

*[Fixed row]*

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

*Select all that apply*

☑ Defra Environmental Reporting Guidelines: Including streamlined energy and carbon reporting guidance, 2019

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

☑ The Greenhouse Gas Protocol: Scope 2 Guidance

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

### (7.3.1) Scope 2, location-based

*Select from:*

☑ We are reporting a Scope 2, location-based figure

### (7.3.2) Scope 2, market-based

*Select from:*

☑ We are reporting a Scope 2, market-based figure

### (7.3.3) Comment

*Our Scope 2 market based emissions are lower than the scope 2 location based emissions. We use renewable energy and IREC certifications in Holding and Galata Wind companies to reduce market based emissions.*

*[Fixed row]*

## (7.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1, Scope 2 or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure?

*Select from:*

☑ Yes

## (7.4.1) Provide details of the sources of Scope 1, Scope 2, or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure.

### Row 1

### (7.4.1.1) Source of excluded emissions

*There are Scope 3 categories within the reporting boundary that have not been included in the disclosure, as some are not relevant to Doğan Holding's business model, while others are relevant but have not yet been calculated.*

### (7.4.1.2) Scope(s) or Scope 3 category(ies)

*Select all that apply*

☑ Scope 3: Upstream leased assets

☑ Scope 3: Processing of sold products

☑ Scope 3: End-of-life treatment of sold products

☑ Scope 3: Franchises

### (7.4.1.6) Relevance of Scope 3 emissions from this source

*Select from:*

☑ Emissions are not relevant

### (7.4.1.9) Estimated percentage of total Scope 3 emissions this excluded source represents

*0*

### (7.4.1.10) Explain why this source is excluded

*Doğan Holding's business model is not relevant for the calculation of these categories in scope-3 emissions. These categories of Scope-3 emission is negligible compared to total footprint.*

## (7.4.1.11) Explain how you estimated the percentage of emissions this excluded source represents

*We assessed the relevance of Scope 3 Category 8 (Upstream leased assets), Scope 3 Category 10 – Processing of sold products, Scope 3 Category 12 – End-of-life treatment of sold products, and Scope 3 Category 14 – Franchises by reviewing Doğan Holding's business model and operations. Doğan Holding does not rely on significant upstream leased assets, and therefore this category does not generate material emissions. Internal evaluations, combined with industry benchmarks and peer disclosures, indicate that such emissions would represent a negligible share of the total carbon footprint. On this basis, we conservatively estimated the contribution of this category as 0% of total Scope 3 emissions. We confirmed Doğan Holding does not sell products that require downstream processing resulting in material GHG emissions. Based on this business model assessment and comparison with industry benchmarks, the contribution of this category to total Scope 3 emissions is considered immaterial. Therefore, we conservatively estimated the percentage of emissions from this source as 0% of total Scope 3 emissions. Doğan Holding does not rely on franchises, and therefore this category does not generate material emissions.*

### Row 2

## (7.4.1.1) Source of excluded emissions

*There are Scope 3 categories within the reporting boundary that have not been included in the disclosure, as some are not relevant to Doğan Holding's business model, while others are relevant but have not yet been calculated.*

## (7.4.1.2) Scope(s) or Scope 3 category(ies)

*Select all that apply*

☑ Scope 3: Investments
☑ Scope 3: Capital goods
☑ Scope 3: Use of sold products
☑ Scope 3: Downstream leased assets
☑ Scope 3: Purchased goods and services
☑ Scope 3: Waste generated in operations
☑ Scope 3: Upstream transportation and distribution
☑ Scope 3: Downstream transportation and distribution
☑ Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2)

## (7.4.1.6) Relevance of Scope 3 emissions from this source

*Select from:*

☑ Emissions are relevant but not yet calculated

## (7.4.1.9) Estimated percentage of total Scope 3 emissions this excluded source represents

*0*

## (7.4.1.10) Explain why this source is excluded

*As emissions for these categories have not yet been calculated due to data collection challenges, we are currently unable to provide an estimated percentage of total Scope 3 emissions they represent. However, these categories are considered relevant, and processes are being developed to collect supplier-specific data and enhance estimation methodologies in order to quantify their contribution in future reporting cycles.*

## (7.4.1.11) Explain how you estimated the percentage of emissions this excluded source represents

*Doğan Holding has identified several Scope 3 categories (1 – Purchased goods and services, 2 – Capital goods, 3 – Fuel- and energy-related activities, 4 – Upstream transportation and distribution, 5 – Waste generated in operations, 9 – Downstream transportation and distribution, 11 – Use of sold products, 13 – Downstream leased assets, and 15 – Investments) as relevant but not yet calculated. Due to current data collection challenges, emissions from these categories have not been quantified. However, the Group is actively working on establishing supplier engagement and data collection processes to enable more accurate calculation and disclosure in future reporting cycles*
*[Add row]*

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

## Scope 1

## (7.5.1) Base year end

*12/31/2019*

## (7.5.2) Base year emissions (metric tons CO2e)

*20394.65*

## (7.5.3) Methodological details

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

## Scope 2 (location-based)

### (7.5.1) Base year end

*12/31/2019*

### (7.5.2) Base year emissions (metric tons CO2e)

*28343.38*

### (7.5.3) Methodological details

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

## Scope 2 (market-based)

### (7.5.1) Base year end

*12/31/2019*

### (7.5.2) Base year emissions (metric tons CO2e)

*28343.38*

### (7.5.3) Methodological details

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

## Scope 3 category 1: Purchased goods and services

### (7.5.1) Base year end

*12/31/2019*

## (7.5.2) Base year emissions (metric tons CO2e)

*0.0*

## (7.5.3) Methodological details

-

### Scope 3 category 2: Capital goods

## (7.5.1) Base year end

*12/31/2019*

## (7.5.2) Base year emissions (metric tons CO2e)

*0.0*

## (7.5.3) Methodological details

-

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

## (7.5.1) Base year end

*12/31/2019*

## (7.5.2) Base year emissions (metric tons CO2e)

*0.0*

## (7.5.3) Methodological details

-

## Scope 3 category 4: Upstream transportation and distribution

### (7.5.1) Base year end

*12/31/2019*

### (7.5.2) Base year emissions (metric tons CO2e)

*0.0*

### (7.5.3) Methodological details

*-*

## Scope 3 category 5: Waste generated in operations

### (7.5.1) Base year end

*12/31/2019*

### (7.5.2) Base year emissions (metric tons CO2e)

*0.0*

### (7.5.3) Methodological details

*-*

## Scope 3 category 6: Business travel

### (7.5.1) Base year end

*12/31/2019*

### (7.5.2) Base year emissions (metric tons CO2e)

*0.0*

## (7.5.3) Methodological details

-

### Scope 3 category 7: Employee commuting

## (7.5.1) Base year end

*12/31/2019*

## (7.5.2) Base year emissions (metric tons CO2e)

*0.0*

## (7.5.3) Methodological details

-

### Scope 3 category 8: Upstream leased assets

## (7.5.1) Base year end

*12/31/2019*

## (7.5.2) Base year emissions (metric tons CO2e)

*0.0*

## (7.5.3) Methodological details

-

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

## (7.5.1) Base year end

*12/31/2019*

## (7.5.2) Base year emissions (metric tons CO2e)

*0.0*

## (7.5.3) Methodological details

*-*

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

## (7.5.1) Base year end

*12/31/2019*

## (7.5.2) Base year emissions (metric tons CO2e)

*0.0*

## (7.5.3) Methodological details

*-*

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

## (7.5.1) Base year end

*12/31/2019*

## (7.5.2) Base year emissions (metric tons CO2e)

*0.0*

## (7.5.3) Methodological details

-

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

## (7.5.1) Base year end

*12/31/2019*

## (7.5.2) Base year emissions (metric tons CO2e)

*0.0*

## (7.5.3) Methodological details

-

### Scope 3 category 13: Downstream leased assets

## (7.5.1) Base year end

*12/31/2019*

## (7.5.2) Base year emissions (metric tons CO2e)

*0.0*

## (7.5.3) Methodological details

-

### Scope 3 category 14: Franchises

## (7.5.1) Base year end

*12/31/2019*

## (7.5.2) Base year emissions (metric tons CO2e)

*0.0*

## (7.5.3) Methodological details

*-*

### Scope 3 category 15: Investments

## (7.5.1) Base year end

*12/31/2019*

## (7.5.2) Base year emissions (metric tons CO2e)

*0.0*

## (7.5.3) Methodological details

*-*

### Scope 3: Other (upstream)

## (7.5.1) Base year end

*12/31/2019*

## (7.5.2) Base year emissions (metric tons CO2e)

*0.0*

## (7.5.3) Methodological details

-

### Scope 3: Other (downstream)

## (7.5.1) Base year end

*12/31/2019*

## (7.5.2) Base year emissions (metric tons CO2e)

*0.0*

## (7.5.3) Methodological details

-
*[Fixed row]*

### (7.6) What were your organization’s gross global Scope 1 emissions in metric tons CO2e?

### Reporting year

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

*7816.02*

## (7.6.3) Methodological details

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

### Past year 1

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

*6375.66*

## (7.6.2) End date

*12/30/2023*

## (7.6.3) Methodological details

*For Scope 1 calculation, stationary and mobile combustion data were used for all locations. According to the IPCC Sixth Assessment Report, GWP and conversion factors were applied to the consumption data. As our calculation methodology changed from the operational control approach to the financial control approach in 2024, past year (2023) Scope 1 emissions were recalculated to align with the new methodology. This recalculation was made to ensure consistency and comparability of reported data across reporting years.*
*[Fixed row]*

# (7.7) What were your organization’s gross global Scope 2 emissions in metric tons CO2e?

## Reporting year

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

*27844.69*

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

*26627.63*

## (7.7.4) Methodological details

*We purchase electricity from the national grid. We also purchase International Renewable Energy Certificates (I-RECs) as proof of the use of renewable electricity. The location-based emission factor is used as a proxy for the calculation of market-based Scope 2 emissions. The grid emission factor is sourced from the data published by the Turkish Ministry of Energy and Natural Resources.*

## Past year 1

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

*15029.35*

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

*15029.35*

## (7.7.3) End date

*12/30/2023*

## (7.7.4) Methodological details

*We purchase electricity from the national grid. We also purchase International Renewable Energy Certificates (I-RECs) as proof of the use of renewable electricity. The location-based emission factor is used as a proxy for the calculation of market-based Scope 2 emissions. The grid emission factor is sourced from the data published by the Turkish Ministry of Energy and Natural Resources. As our calculation methodology changed from the operational control approach to the financial control approach in 2024, past year (2023) Scope 2 emissions were recalculated to align with the new methodology, ensuring consistency and comparability across reporting years.*
*[Fixed row]*

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

## Purchased goods and services

## (7.8.1) Evaluation status

*Select from:*
☑ Relevant, not yet calculated

## (7.8.5) Please explain

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

## Capital goods

## (7.8.1) Evaluation status

*Select from:*

☑ Relevant, not yet calculated

## (7.8.5) Please explain

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

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

## (7.8.1) Evaluation status

*Select from:*

☑ Relevant, not yet calculated

## (7.8.5) Please explain

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

### Upstream transportation and distribution

## (7.8.1) Evaluation status

*Select from:*

☑ Relevant, not yet calculated

## (7.8.5) Please explain

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

### Waste generated in operations

## (7.8.1) Evaluation status

*Select from:*

☑ Relevant, not yet calculated

## (7.8.5) Please explain

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

# Business travel

## (7.8.1) Evaluation status

*Select from:*

☑ Relevant, calculated

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

*493.17*

## (7.8.3) Emissions calculation methodology

*Select all that apply*

☑ Fuel-based method

☑ Distance-based method

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

*100*

## (7.8.5) Please explain

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

# Employee commuting

## (7.8.1) Evaluation status

*Select from:*

☑ Relevant, calculated

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

*788.27*

## (7.8.3) Emissions calculation methodology

*Select all that apply*

☑ Fuel-based method

☑ Distance-based method

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

*100*

## (7.8.5) Please explain

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

# Upstream leased assets

## (7.8.1) Evaluation status

*Select from:*

☑ Not relevant, explanation provided

## (7.8.5) Please explain

*Doğan Holding’s business model is not relevant for the calculation of this category in scope-3 emissions. This category of Scope-3 emission is negligible compared to total footprint.*

## Downstream transportation and distribution

### (7.8.1) Evaluation status

*Select from:*

☑ Relevant, not yet calculated

### (7.8.5) Please explain

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

## Processing of sold products

### (7.8.1) Evaluation status

*Select from:*

☑ Not relevant, explanation provided

### (7.8.5) Please explain

*Doğan Holding's business model is not relevant for the calculation of this category in scope-3 emissions. This category of Scope-3 emission is negligible compared to total footprint.*

## Use of sold products

### (7.8.1) Evaluation status

*Select from:*

☑ Relevant, not yet calculated

### (7.8.5) Please explain

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

## End of life treatment of sold products

### (7.8.1) Evaluation status

*Select from:*

☑ Not relevant, explanation provided

### (7.8.5) Please explain

*Doğan Holding's business model is not relevant for the calculation of this category in scope-3 emissions. This category of Scope-3 emission is negligible compared to total footprint.*

## Downstream leased assets

### (7.8.1) Evaluation status

*Select from:*

☑ Relevant, not yet calculated

### (7.8.5) Please explain

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

## Franchises

### (7.8.1) Evaluation status

*Select from:*

☑ Not relevant, explanation provided

### (7.8.5) Please explain

*Doğan Holding's business model is not relevant for the calculation of this category in scope-3 emissions. This category of Scope-3 emission is negligible compared to total footprint.*

## Investments

### (7.8.1) Evaluation status

*Select from:*

☑ Relevant, not yet calculated

### (7.8.5) Please explain

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

## Other (upstream)

### (7.8.1) Evaluation status

*Select from:*

☑ Not relevant, explanation provided

### (7.8.5) Please explain

*Doğan Holding's business model is not relevant for the calculation of this category in scope-3 emissions. This category of Scope-3 emission is negligible compared to total footprint.*

## Other (downstream)

### (7.8.1) Evaluation status

*Select from:*

☑ Not relevant, explanation provided

### (7.8.5) Please explain

*Doğan Holding's business model is not relevant for the calculation of this category in scope-3 emissions. This category of Scope-3 emission is negligible compared to total footprint.*

*[Fixed row]*

## (7.8.1) Disclose or restate your Scope 3 emissions data for previous years.

### Past year 1

#### (7.8.1.1) End date

*12/29/2023*

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

*0*

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

*0*

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

*0*

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

*0*

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

*0*

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

*353.46*

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

*434.41*

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

*0*

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

*0*

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

*0*

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

*0*

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

*0*

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

*0*

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

*0*

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

*0*

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

*0*

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

*0*

## (7.8.1.19) Comment

*There is 63% increase compared to the previous year. Emissions from business-related transatlantic travel under Category 6 were excluded from the calculation. As part of our Scope 3 emissions reduction strategy, we plan to implement innovative approaches such as route optimizations and alternative fuel vehicle solutions. We aim to reduce carbon emissions from employee shuttle services and introduce lower-carbon, innovative transportation solutions for business travel in the upcoming term. In addition, as last year's emission figures were entered into the CDP report before the audit process, some errors were identified. This year, these errors have been corrected and the data has been recalculated in line with the financial control approach, and the updated values are reported.*
*[Fixed row]*

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

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

*[Fixed row]*

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

### Row 1

## (7.9.1.1) Verification or assurance cycle in place

*Select from:*
☑ Annual process

## (7.9.1.2) Status in the current reporting year

*Select from:*
☑ Underway but not complete for reporting year – previous statement of process attached

## (7.9.1.3) Type of verification or assurance

*Select from:*
☑ Limited assurance

## (7.9.1.4) Attach the statement

*DOHOL_sustainability-report-2023.pdf*

## (7.9.1.5) Page/section reference

*100-103*

## (7.9.1.6) Relevant standard

*Select from:*
☑ ISAE 3410

## (7.9.1.7) Proportion of reported emissions verified (%)

*100*
*[Add row]*

## (7.9.2) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.

### Row 1

### (7.9.2.1) Scope 2 approach

*Select from:*
☑ Scope 2 location-based

### (7.9.2.2) Verification or assurance cycle in place

*Select from:*
☑ Annual process

### (7.9.2.3) Status in the current reporting year

*Select from:*
☑ Underway but not complete for reporting year – previous statement of process attached

### (7.9.2.4) Type of verification or assurance

*Select from:*
☑ Limited assurance

### (7.9.2.5) Attach the statement

*DOHOL_sustainability-report-2023.pdf*

### (7.9.2.6) Page/ section reference

*100-103*

### (7.9.2.7) Relevant standard

*Select from:*
☑ ISAE 3410

### (7.9.2.8) Proportion of reported emissions verified (%)

*100*
*[Add row]*

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

## Row 1

### (7.9.3.1) Scope 3 category

*Select all that apply*
☑ Scope 3: Business travel
☑ Scope 3: Employee commuting

### (7.9.3.2) Verification or assurance cycle in place

*Select from:*
☑ Annual process

### (7.9.3.3) Status in the current reporting year

*Select from:*
☑ Underway but not complete for reporting year – previous statement of process attached

### (7.9.3.4) Type of verification or assurance

*Select from:*
☑ Limited assurance

## (7.9.3.5) Attach the statement

*DOHOL_sustainability-report-2023.pdf*

## (7.9.3.6) Page/section reference

*100-103*

## (7.9.3.7) Relevant standard

*Select from:*
☑ ISAE 3410

## (7.9.3.8) Proportion of reported emissions verified (%)

*100*
*[Add row]*

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

*Select from:*
☑ Increased

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

## Change in renewable energy consumption

## (7.10.1.1) Change in emissions (metric tons CO2e)

*1217*

## (7.10.1.2) Direction of change in emissions

*Select from:*

☑ Decreased

### (7.10.1.3) Emissions value (percentage)

*20*

### (7.10.1.4) Please explain calculation

*While acquisitions significantly increased our total Scope 2 location based emissions, the purchase of I-RECs for electricity consumption reduced our market-based Scope 2 footprint by ~1,217 $tCO_2e$ compared to a location-based approach. This renewable energy procurement partially mitigated the overall increase in emissions.*

## Other emissions reduction activities

### (7.10.1.1) Change in emissions (metric tons CO2e)

*0*

### (7.10.1.2) Direction of change in emissions

*Select from:*

☑ No change

### (7.10.1.3) Emissions value (percentage)

*0*

### (7.10.1.4) Please explain calculation

*N/A*

## Divestment

### (7.10.1.1) Change in emissions (metric tons CO2e)

*0*

## (7.10.1.2) Direction of change in emissions

*Select from:*

☑ No change

## (7.10.1.3) Emissions value (percentage)

*0*

## (7.10.1.4) Please explain calculation

*N/A*

### Acquisitions

## (7.10.1.1) Change in emissions (metric tons CO2e)

*14255.77*

## (7.10.1.2) Direction of change in emissions

*Select from:*

☑ Increased

## (7.10.1.3) Emissions value (percentage)

*40*

## (7.10.1.4) Please explain calculation

*Our gross Scope 1 and Scope 2 emissions increased in total by 14255.77 $tCO_2e$ in 2024 compared to 2023. The primary driver was the consolidation of Gümüştaş Madencilik ve Ticaret A.Ş. and Doku Madencilik ve Ticaret A.Ş., which contributed a combined total of ~13,564 tCO2e.*

### Mergers

## (7.10.1.1) Change in emissions (metric tons CO2e)

*0*

## (7.10.1.2) Direction of change in emissions

*Select from:*
☑ No change

## (7.10.1.3) Emissions value (percentage)

*0*

## (7.10.1.4) Please explain calculation

*N/A*

### Change in output

## (7.10.1.1) Change in emissions (metric tons CO2e)

*0*

## (7.10.1.2) Direction of change in emissions

*Select from:*
☑ No change

## (7.10.1.3) Emissions value (percentage)

*0*

## (7.10.1.4) Please explain calculation

*N/A*

## Change in methodology

### (7.10.1.1) Change in emissions (metric tons CO2e)

*0*

### (7.10.1.2) Direction of change in emissions

*Select from:*
☑ No change

### (7.10.1.3) Emissions value (percentage)

*0*

### (7.10.1.4) Please explain calculation

*N/A*

## Change in boundary

### (7.10.1.1) Change in emissions (metric tons CO2e)

*0*

### (7.10.1.2) Direction of change in emissions

*Select from:*
☑ No change

### (7.10.1.3) Emissions value (percentage)

*0*

### (7.10.1.4) Please explain calculation

*N/A*

### Change in physical operating conditions

#### (7.10.1.1) Change in emissions (metric tons CO2e)

*0*

#### (7.10.1.2) Direction of change in emissions

*Select from:*
☑ No change

#### (7.10.1.3) Emissions value (percentage)

*0*

#### (7.10.1.4) Please explain calculation

*N/A*

### Unidentified

#### (7.10.1.1) Change in emissions (metric tons CO2e)

*0*

#### (7.10.1.2) Direction of change in emissions

*Select from:*
☑ No change

#### (7.10.1.3) Emissions value (percentage)

*0*

## (7.10.1.4) Please explain calculation

*N/A*
*[Fixed row]*

## (7.10.2) Are your emissions performance calculations in 7.10 and 7.10.1 based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?

*Select from:*
☑ Location-based

## (7.12) Are carbon dioxide emissions from biogenic carbon relevant to your organization?

*Select from:*
☑ No

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

*Select from:*
☑ No

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

| | Scope 1 emissions (metric tons CO2e) | Scope 2, location-based (metric tons CO2e) | Scope 2, market-based (metric tons CO2e) |
|---|---|---|---|
| Turkey | *7816* | *27845* | *26628* |

*[Fixed row]*

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

*Select all that apply*

☑ By business division

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

### Row 1

#### (7.17.1.1) Business division

*Holding*

#### (7.17.1.2) Scope 1 emissions (metric ton CO2e)

*553.23*

### Row 2

#### (7.17.1.1) Business division

*Industry*

#### (7.17.1.2) Scope 1 emissions (metric ton CO2e)

*2970*

### Row 3

#### (7.17.1.1) Business division

*Electricity Generation*

#### (7.17.1.2) Scope 1 emissions (metric ton CO2e)

*171*

### Row 4

#### (7.17.1.1) Business division

*Automotive Trade and Marketing*

#### (7.17.1.2) Scope 1 emissions (metric ton CO2e)

*635*

### Row 5

#### (7.17.1.1) Business division

*Finance and Investment*

#### (7.17.1.2) Scope 1 emissions (metric ton CO2e)

*372*

### Row 6

#### (7.17.1.1) Business division

*Real Estate Investment*

#### (7.17.1.2) Scope 1 emissions (metric ton CO2e)

*164*

### Row 7

#### (7.17.1.1) Business division

*Internet, Entertainment and Media*

## (7.17.1.2) Scope 1 emissions (metric ton CO2e)

*921*

### Row 8

## (7.17.1.1) Business division

*Mining*

## (7.17.1.2) Scope 1 emissions (metric ton CO2e)

*2030*
*[Add row]*

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

*Select all that apply*
☑ By business division

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

### Row 1

## (7.20.1.1) Business division

*Holding*

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

*518*

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

*0*

### Row 2

#### (7.20.1.1) Business division

*Industry*

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

*12077*

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

*12077*

### Row 3

#### (7.20.1.1) Business division

*Electricity Generation*

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

*699*

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

*0*

### Row 4

#### (7.20.1.1) Business division

*Automotive Trade and Marketing*

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

*884*

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

*884*

### Row 5

## (7.20.1.1) Business division

*Finance and Investment*

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

*164*

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

*164*

### Row 6

## (7.20.1.1) Business division

*Real Estate Investment*

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

*1412*

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

*1412*

### Row 7

### (7.20.1.1) Business division

*Internet, Entertainment and Media*

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

*153*

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

*153*

## Row 8

### (7.20.1.1) Business division

*Mining*

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

*11534*

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

*11534*
*[Add row]*

## (7.22) Break down your gross Scope 1 and Scope 2 emissions between your consolidated accounting group and other entities included in your response.

## Consolidated accounting group

### (7.22.1) Scope 1 emissions (metric tons CO2e)

*7816*

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

*27845*

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

*26628*

### (7.22.4) Please explain

*These emissions include Consolidated accounting group's total emissions.*

## All other entities

### (7.22.1) Scope 1 emissions (metric tons CO2e)

*247*

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

*475*

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

*475*

### (7.22.4) Please explain

*These emissions include all other entities except the consolidated accounting group's total emissions.*
*[Fixed row]*

## (7.23) Is your organization able to break down your emissions data for any of the subsidiaries included in your CDP response?

*Select from:*
☑ Yes

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

### Row 1

### (7.23.1.1) Subsidiary name

*Doğan Yatırım Bankası A.Ş.*

### (7.23.1.2) Primary activity

*Select from:*
☑ Banks

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

*Select all that apply*
☑ No unique identifier

### (7.23.1.12) Scope 1 emissions (metric tons CO2e)

*125.7*

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

*49.45*

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

*49.45*

### (7.23.1.15) Comment

*n/a*

## Row 2

### (7.23.1.1) Subsidiary name

*Ditaş Doğan Yedek Parça İmalat ve Teknik A.Ş.*

### (7.23.1.2) Primary activity

*Select from:*
☑ Other vehicle equipment & systems

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

*Select all that apply*
☑ ISIN code - equity

### (7.23.1.5) ISIN code – equity

*TRADITAS91H8*

### (7.23.1.12) Scope 1 emissions (metric tons CO2e)

*1041.68*

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

*3684.9*

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

*3684.9*

### (7.23.1.15) Comment

*n/a*

## Row 5

### (7.23.1.1) Subsidiary name

*Doğan Trend Otomotiv*

### (7.23.1.2) Primary activity

*Select from:*
☑ Automobiles

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

*Select all that apply*
☑ No unique identifier

### (7.23.1.12) Scope 1 emissions (metric tons CO2e)

*634.58*

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

*884.33*

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

*884.33*

### (7.23.1.15) Comment

*n/a*

## Row 6

## (7.23.1.1) Subsidiary name

*Galata Wind Enerji A.Ş.*

## (7.23.1.2) Primary activity

*Select from:*
☑ Energy services & equipment

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

*Select all that apply*
☑ ISIN code - equity

## (7.23.1.5) ISIN code – equity

*TREGWIN00014*

## (7.23.1.12) Scope 1 emissions (metric tons CO2e)

*170.54*

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

*699*

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

*0*

## (7.23.1.15) Comment

*n/a*

### Row 7

## (7.23.1.1) Subsidiary name

*Doğan Gayrimenkul Yatırımları ve Ticaret A.Ş.*

## (7.23.1.2) Primary activity

*Select from:*
☑ Real estate services

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

*Select all that apply*
☑ No unique identifier

## (7.23.1.12) Scope 1 emissions (metric tons CO2e)

*50.7*

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

*25.04*

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

*25.04*

## (7.23.1.15) Comment

*n/a*

### Row 8

## (7.23.1.1) Subsidiary name

*Doğan Yayınları Yayıncılık ve Yapımcılık Ticaret A.Ş.*

## (7.23.1.2) Primary activity

*Select from:*

☑ Print publishing

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

*Select all that apply*

☑ No unique identifier

## (7.23.1.12) Scope 1 emissions (metric tons CO2e)

*183*

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

*116.13*

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

*116.13*

## (7.23.1.15) Comment

*n/a*

### Row 9

## (7.23.1.1) Subsidiary name

*Sesa Ambalaj ve Plastik Sanayi Ticaret A.Ş.*

## (7.23.1.2) Primary activity

*Select from:*

☑ Plastic products

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

*Select all that apply*

☑ No unique identifier

## (7.23.1.12) Scope 1 emissions (metric tons CO2e)

*1227.81*

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

*5877.67*

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

*5877.67*

## (7.23.1.15) Comment

*n/a*

### Row 10

## (7.23.1.1) Subsidiary name

*Karel*

## (7.23.1.2) Primary activity

*Select from:*

☑ Communications equipment

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

*Select all that apply*

☑ No unique identifier

## (7.23.1.12) Scope 1 emissions (metric tons CO2e)

*420.66*

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

*1467.85*

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

*1467.85*

## (7.23.1.15) Comment

*n/a*

### Row 11

## (7.23.1.1) Subsidiary name

*Doruk Faktoring*

## (7.23.1.2) Primary activity

*Select from:*

☑ Other financial

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

*Select all that apply*

☑ No unique identifier

## (7.23.1.12) Scope 1 emissions (metric tons CO2e)

*176.85*

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

*85.52*

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

*85.52*

## (7.23.1.15) Comment

*n/a*

### Row 12

## (7.23.1.1) Subsidiary name

*Kelkit Doğan Besi*

## (7.23.1.2) Primary activity

*Select from:*
☑ Cattle farming

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

*Select all that apply*
☑ No unique identifier

## (7.23.1.12) Scope 1 emissions (metric tons CO2e)

*155.46*

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

*117.45*

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

*117.45*

## (7.23.1.15) Comment

*n/a*

### Row 13

## (7.23.1.1) Subsidiary name

*Hepsi Emlak*

## (7.23.1.2) Primary activity

*Select from:*
☑ Web-based services

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

*Select all that apply*
☑ No unique identifier

## (7.23.1.12) Scope 1 emissions (metric tons CO2e)

*442.65*

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

*33.27*

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

*33.27*

## (7.23.1.15) Comment

*n/a*

### Row 15

## (7.23.1.1) Subsidiary name

*Hepiyi Sigorta*

## (7.23.1.2) Primary activity

*Select from:*
☑ Insurance

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

*Select all that apply*
☑ No unique identifier

## (7.23.1.12) Scope 1 emissions (metric tons CO2e)

*69.5*

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

*29.38*

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

*29.38*

## (7.23.1.15) Comment

*n/a*

### Row 16

## (7.23.1.1) Subsidiary name

*Daiichi*

## (7.23.1.2) Primary activity

*Select from:*
☑ Electrical equipment

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

*Select all that apply*
☑ No unique identifier

## (7.23.1.12) Scope 1 emissions (metric tons CO2e)

*28.36*

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

*19.43*

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

*19.43*

## (7.23.1.15) Comment

*n/a*

## Row 17

### (7.23.1.1) Subsidiary name

*Profil Sanayi ve Ticaret A.Ş.*

### (7.23.1.2) Primary activity

*Select from:*
☑ Metals supply, wholesale & trading

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

*Select all that apply*
☑ No unique identifier

### (7.23.1.12) Scope 1 emissions (metric tons CO2e)

*79.36*

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

*520.89*

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

*520.89*

### (7.23.1.15) Comment

*n/a*

## Row 18

### (7.23.1.1) Subsidiary name

*Maksipak*

## (7.23.1.2) Primary activity

*Select from:*
☑ Plastic products

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

*Select all that apply*
☑ No unique identifier

## (7.23.1.12) Scope 1 emissions (metric tons CO2e)

*16.88*

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

*288.33*

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

*288.33*

## (7.23.1.15) Comment

*n/a*

### Row 19

## (7.23.1.1) Subsidiary name

*Milta Bodrum Marina*

## (7.23.1.2) Primary activity

*Select from:*
☑ Other professional services

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

*Select all that apply*
☑ No unique identifier

## (7.23.1.12) Scope 1 emissions (metric tons CO2e)

*113.61*

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

*1386.87*

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

*1386.87*

## (7.23.1.15) Comment

*n/a*

### Row 20

## (7.23.1.1) Subsidiary name

*Doğan Holding*

## (7.23.1.2) Primary activity

*Select from:*
☑ Other professional services

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

*Select all that apply*

☑ ISIN code – bond

☑ ISIN code - equity

☑ Ticker symbol

☑ LEI number

## (7.23.1.4) ISIN code – bond

*TRFDHOL92315*

## (7.23.1.5) ISIN code – equity

*TRADOHOL91Q8*

## (7.23.1.7) Ticker symbol

*DOHOL*

## (7.23.1.9) LEI number

*789000J24Q4JM3H6UX22*

## (7.23.1.12) Scope 1 emissions (metric tons CO2e)

*553.23*

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

*517.65*

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

*0*

## (7.23.1.15) Comment

*n/a*

### Row 21

## (7.23.1.1) Subsidiary name

*Gümüştaş Madencilik Ve Ticaret Anonim Şirketi*

## (7.23.1.2) Primary activity

*Select from:*
☑ Other professional services

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

*Select all that apply*
☑ No unique identifier

## (7.23.1.12) Scope 1 emissions (metric tons CO2e)

*1607.29*

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

*11292.36*

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

*11292.36*

## (7.23.1.15) Comment

*n/a*

## Row 22

### (7.23.1.1) Subsidiary name

*Doku Madencilik Ve Ticaret Anonim Şirketi*

### (7.23.1.2) Primary activity

*Select from:*
☑ Other professional services

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

*Select all that apply*
☑ No unique identifier

### (7.23.1.12) Scope 1 emissions (metric tons CO2e)

*422.42*

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

*242.08*

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

*242.08*

### (7.23.1.15) Comment

*n/a*
*[Add row]*

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

*Select from:*
☑ More than 20% but less than or equal to 25%

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

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

*[Fixed row]*

## (7.30.1) Report your organization’s energy consumption totals (excluding feedstocks) in MWh.

## Consumption of fuel (excluding feedstock)

### (7.30.1.1) Heating value

*Select from:*

☑ LHV (lower heating value)

### (7.30.1.2) MWh from renewable sources

*0*

### (7.30.1.3) MWh from non-renewable sources

*42668*

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

*42668.00*

## Consumption of purchased or acquired electricity

### (7.30.1.1) Heating value

*Select from:*

☑ LHV (lower heating value)

### (7.30.1.2) MWh from renewable sources

*1266*

### (7.30.1.3) MWh from non-renewable sources

*86716*

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

*87982.00*

## Total energy consumption

### (7.30.1.1) Heating value

*Select from:*
☑ LHV (lower heating value)

### (7.30.1.2) MWh from renewable sources

*1266*

### (7.30.1.3) MWh from non-renewable sources

*129384*

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

*130650.00*
*[Fixed row]*

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

| | Indicate whether your organization undertakes this fuel application |
|---|---|
| Consumption of fuel for the generation of electricity | *Select from:*<br>☑ No |
| Consumption of fuel for the generation of heat | *Select from:*<br>☑ Yes |
| Consumption of fuel for the generation of steam | *Select from:*<br>☑ No |

| | Indicate whether your organization undertakes this fuel application |
|---|---|
| Consumption of fuel for the generation of cooling | *Select from:*<br>☑ No |
| Consumption of fuel for co-generation or tri-generation | *Select from:*<br>☑ No |

*[Fixed row]*

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

### Sustainable biomass

### (7.30.7.1) Heating value

*Select from:*
☑ LHV

### (7.30.7.2) Total fuel MWh consumed by the organization

*0*

### (7.30.7.8) Comment

-

### Other biomass

### (7.30.7.1) Heating value

*Select from:*

☑ LHV

## (7.30.7.2) Total fuel MWh consumed by the organization

*0*

## (7.30.7.8) Comment

-

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

## (7.30.7.1) Heating value

*Select from:*
☑ LHV

## (7.30.7.2) Total fuel MWh consumed by the organization

*0*

## (7.30.7.8) Comment

-

### Coal

## (7.30.7.1) Heating value

*Select from:*
☑ LHV

## (7.30.7.2) Total fuel MWh consumed by the organization

*0*

## (7.30.7.8) Comment

-

### Oil

## (7.30.7.1) Heating value

*Select from:*
☑ LHV

## (7.30.7.2) Total fuel MWh consumed by the organization

*22791*

## (7.30.7.8) Comment

*This figure consists of diesel, petrol and other oil consumptions.*

### Gas

## (7.30.7.1) Heating value

*Select from:*
☑ LHV

## (7.30.7.2) Total fuel MWh consumed by the organization

*19876*

## (7.30.7.8) Comment

*This figure consists of natural gas consumptions*

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

## (7.30.7.1) Heating value

*Select from:*
☑ LHV

## (7.30.7.2) Total fuel MWh consumed by the organization

*0*

## (7.30.7.8) Comment

*-*

### Total fuel

## (7.30.7.1) Heating value

*Select from:*
☑ LHV

## (7.30.7.2) Total fuel MWh consumed by the organization

*42668*

## (7.30.7.8) Comment

*This figure is the sum of natural gas, diesel, petrol and oil consumptions (oil includes LPG).*
*[Fixed row]*

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

### Row 1

## (7.30.14.1) Country/area

*Select from:*

☑ Turkey

## (7.30.14.2) Sourcing method

*Select from:*

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

## (7.30.14.3) Energy carrier

*Select from:*

☑ Electricity

## (7.30.14.4) Low-carbon technology type

*Select from:*

☑ Wind

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

*1266*

## (7.30.14.6) Tracking instrument used

*Select from:*

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

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

*Select from:*

☑ Turkey

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

*Select from:*
☑ Yes

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

*2010*

### (7.30.14.10) Comment

-
*[Add row]*

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

## Turkey

### (7.30.16.1) Consumption of purchased electricity (MWh)

*87982*

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

*0*

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

*0*

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

*0*

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

*87982.00*

*[Fixed row]*

## (7.45) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

### Row 1

### (7.45.1) Intensity figure

*0.422*

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

*35661*

### (7.45.3) Metric denominator

*Select from:*
☑ unit total revenue

### (7.45.4) Metric denominator: Unit total

*84500*

### (7.45.5) Scope 2 figure used

*Select from:*
☑ Location-based

### (7.45.6) % change from previous year

*41*

### (7.45.7) Direction of change

*Select from:*

☑ Increased

## (7.45.8) Reasons for change

*Select all that apply*

☑ Change in output

☑ Change in revenue

## (7.45.9) Please explain

*: In the reporting year, revenue has increased, while Scope 1 and 2 emissions have shown a decrease, primarily due to a change in the calculation methodology. Additionally, for this year's intensity calculations, total revenue was considered in million TL. Consequently, this methodological adjustment has resulted in an apparent significant change in the reported intensity values. In addition, as last year's emission figures were entered into the CDP report before the audit process, some errors were identified. This year, these errors have been corrected and the intensity data has been recalculated in line with the financial control approach, and the updated values are reported.*
*[Add row]*

# (7.52) Provide any additional climate-related metrics relevant to your business.

## Row 1

## (7.52.1) Description

*Select from:*

☑ Other, please specify :Total Installed Power Capacity

## (7.52.2) Metric value

*297*

## (7.52.3) Metric numerator

*MW*

## (7.52.4) Metric denominator (intensity metric only)

-

## (7.52.5) % change from previous year

*2*

## (7.52.6) Direction of change

*Select from:*

☑ Increased

## (7.52.7) Please explain

*Galata Wind’s total installed capacity stands at 297 MW, reflecting a 2% increase compared to 2023. This progress is monitored and reported in line with the Group's sustainability targets.*
*[Add row]*

# (7.53) Did you have an emissions target that was active in the reporting year?

*Select all that apply*

☑ Absolute target

# (7.53.1) Provide details of your absolute emissions targets and progress made against those targets.

## Row 1

## (7.53.1.1) Target reference number

*Select from:*

☑ Abs 2

## (7.53.1.2) Is this a science-based target?

*Select from:*

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

## (7.53.1.5) Date target was set

*12/30/2024*

## (7.53.1.6) Target coverage

*Select from:*

☑ Organization-wide

## (7.53.1.7) Greenhouse gases covered by target

*Select all that apply*

☑ Methane (CH4)

☑ Nitrous oxide (N2O)

☑ Carbon dioxide (CO2)

☑ Perfluorocarbons (PFCs)

☑ Hydrofluorocarbons (HFCs)

☑ Sulphur hexafluoride (SF6)

☑ Nitrogen trifluoride (NF3)

## (7.53.1.8) Scopes

*Select all that apply*

☑ Scope 3

## (7.53.1.10) Scope 3 categories

*Select all that apply*

☑ Scope 3, Category 6 – Business travel

☑ Scope 3, Category 7 – Employee commuting

## (7.53.1.11) End date of base year

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

353.46

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

434.41

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

787.870

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

787.870

## (7.53.1.40) Base year Scope 3, Category 6: Business travel emissions covered by target as % of total base year emissions in Scope 3, Category 6: Business travel (metric tons CO2e)

100

## (7.53.1.41) Base year Scope 3, Category 7: Employee commuting covered by target as % of total base year emissions in Scope 3, Category 7: Employee commuting (metric tons CO2e)

100

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

100

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

*100*

## (7.53.1.54) End date of target

*12/31/2039*

## (7.53.1.55) Targeted reduction from base year (%)

*40*

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

*472.722*

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

*493.17*

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

*434.41*

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

*927.580*

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

*927.580*

## (7.53.1.78) Land-related emissions covered by target

*Select from:*

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

## (7.53.1.79) % of target achieved relative to base year

*-44.33*

## (7.53.1.80) Target status in reporting year

*Select from:*

☑ Underway

## (7.53.1.82) Explain target coverage and identify any exclusions

*This target covers all organization.*

## (7.53.1.83) Target objective

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

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

*In the reporting year, our base year is updated to be the same as the reporting year, which is 2024. This change was required due to portfolio changes and the transition to the financial control methodology. As a result, there is no progress against the target. However, we have a comprehensive plan in place to close this gap and achieve the target within the designated timeframe. We are working on sustainable practices that specifically target Scope 3 emissions, such as improving transportation efficiency and minimizing travel-related emissions.*

## (7.53.1.85) Target derived using a sectoral decarbonization approach

*Select from:*

☑ No

### Row 2

## (7.53.1.1) Target reference number

*Select from:*

☑ Abs 1

## (7.53.1.2) Is this a science-based target?

*Select from:*

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

## (7.53.1.5) Date target was set

*12/30/2024*

## (7.53.1.6) Target coverage

*Select from:*

☑ Organization-wide

## (7.53.1.7) Greenhouse gases covered by target

*Select all that apply*

☑ Methane (CH4)

☑ Nitrous oxide (N2O)

☑ Carbon dioxide (CO2)

☑ Perfluorocarbons (PFCs)

☑ Hydrofluorocarbons (HFCs)

☑ Sulphur hexafluoride (SF6)

☑ Nitrogen trifluoride (NF3)

## (7.53.1.8) Scopes

*Select all that apply*

☑ Scope 1

☑ Scope 2

## (7.53.1.9) Scope 2 accounting method

*Select from:*

☑ Market-based

## (7.53.1.11) End date of base year

*12/30/2024*

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

*7816*

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

*27845*

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

*0.000*

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

*35661.000*

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

*100.0*

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

*100.0*

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

*100.0*

## (7.53.1.54) End date of target

*12/31/2029*

## (7.53.1.55) Targeted reduction from base year (%)

*100*

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

*0.000*

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

*7816*

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

*27845*

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

*35661.000*

## (7.53.1.78) Land-related emissions covered by target

*Select from:*

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

## (7.53.1.79) % of target achieved relative to base year

*0.00*

## (7.53.1.80) Target status in reporting year

*Select from:*

☑ New

## (7.53.1.82) Explain target coverage and identify any exclusions

*This target covers all organization*

## (7.53.1.83) Target objective

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

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

*In the reporting year, our base year is updated to be the same as the reporting year which is 2024. This change was required due to portfolio changes and the transition to the financial control methodology. As a result, there is no progress against the target. Despite the recent changes in our calculation methodology, we remain committed to reducing our Scope 1 and Scope 2 emissions to zero by 2030. We recognize the importance of addressing our direct and indirect carbon footprint and have established a robust plan to achieve this goal. Our strategy includes investing in cleaner technologies and processes to minimize emissions from our operations. We will also enhance our energy efficiency measures and transition to renewable energy sources, ensuring that we reduce our reliance on fossil fuels. Furthermore, we will implement comprehensive monitoring and reporting mechanisms to track our progress and make necessary adjustments along the way. Through these concerted efforts, we are dedicated to achieving net-zero emissions for Scope 1 and Scope 2 by the target date.*

## (7.53.1.85) Target derived using a sectoral decarbonization approach

*Select from:*

☑ Yes

*[Add row]*

# (7.54) Did you have any other climate-related targets that were active in the reporting year?

*Select all that apply*

☑ No other climate-related targets

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

*Select from:*

☑ Yes

# (7.55.1) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.

| | Number of initiatives | Total estimated annual CO2e savings in metric tonnes CO2e |
|---|---|---|
| Under investigation | *0* | *`Numeric input* |
| To be implemented | *0* | *0* |
| Implementation commenced | *0* | *0* |
| Implemented | *1* | *490000* |
| Not to be implemented | *0* | *`Numeric input* |

*[Fixed row]*

## (7.55.2) Provide details on the initiatives implemented in the reporting year in the table below.

### Row 1

### (7.55.2.1) Initiative category & Initiative type

Low-carbon energy generation
☑ Wind

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

*490000*

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

*Select all that apply*
☑ Scope 2 (location-based)

### (7.55.2.4) Voluntary/Mandatory

*Select from:*
☑ Voluntary

### (7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

*2200000*

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

*35000640*

### (7.55.2.7) Payback period

*Select from:*
☑ 16-20 years

### (7.55.2.8) Estimated lifetime of the initiative

*Select from:*
☑ >30 years

### (7.55.2.9) Comment

*Disclosed data belongs to Galata Wind which is one of the subsidiaries of Doğan Holding. Our company continues to invest in wind energy projects as a key part of our low-carbon strategy, supporting long-term emissions reduction and energy transition goals.*
*[Add row]*

## (7.55.3) What methods do you use to drive investment in emissions reduction activities?

## Row 1

### (7.55.3.1) Method

*Select from:*

☑ Financial optimization calculations

### (7.55.3.2) Comment

*Our company applies financial optimization calculations, including payback period and cost-benefit assessments, to prioritize investments in emissions reduction initiatives. For example, wind energy projects are evaluated based on their long-term emission savings, expected lifetime, and financial return, ensuring that capital is directed towards projects that support both sustainability and business value.*
*[Add row]*

## (7.74) Do you classify any of your existing goods and/or services as low-carbon products?

*Select from:*
☑ Yes

## (7.74.1) Provide details of your products and/or services that you classify as low-carbon products.

## Row 1

### (7.74.1.1) Level of aggregation

*Select from:*
☑ Group of products or services

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

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

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

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

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

*One of the main contributors to our climate change performance is Galata Wind, which has a total installed capacity of 297 MW, consisting of wind and solar power plants. As a company that generates 100% renewable energy-based electricity, Galata Wind ensures a decrease of approximately 456,000 tonnes of GHG emissions (CO2e) per annum with its electricity production capacity of approximately 810,137 MWh.*

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

*Select from:*

☑ Yes

## (7.74.1.6) Methodology used to calculate avoided emissions

*Select from:*

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

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

*Select from:*

☑ Use stage

## (7.74.1.8) Functional unit used

*1 MWh of electricity generated.*

## (7.74.1.9) Reference product/service or baseline scenario used

*Turkey Electricity Grid's 2022 emission factor (tonnes of CO2e per MWh of electricity generated) = 0.442*

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

*Select from:*

☑ Use stage

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

*358.08*

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

*358,08 tonnes of CO2e is avoided due to annual zero carbon (PV & Wind use/generation stage) electricity generated compared to conventional electricity generation (average emission of 1 MWh electricity generated in Turkey (2021 TR Grid Emission Factor)).*

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

*7*
*[Add row]*

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

*Select from:*
☑ No

# C9. Environmental performance - Water security

## (9.1) Are there any exclusions from your disclosure of water-related data?

*Select from:*
☑ No

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

## Water withdrawals – total volumes

### (9.2.1) % of sites/facilities/operations

*Select from:*
☑ 100%

### (9.2.2) Frequency of measurement

*Select from:*
☑ Continuously

### (9.2.3) Method of measurement

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

### (9.2.4) Please explain

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

## Water withdrawals – volumes by source

### (9.2.1) % of sites/facilities/operations

*Select from:*

☑ 100%

### (9.2.2) Frequency of measurement

*Select from:*

☑ Continuously

### (9.2.3) Method of measurement

*The metering system installed at the point of water entry allows Doğan Holding and its subsidiaries to accurately monitor and record the volume of water withdrawn from all sources, including third-party suppliers (grid), groundwater and seawater, for their 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 water management practices.*

### (9.2.4) Please explain

*By obtaining water usage data directly from metering systems and the third-party grid suppliers, Doğan Holding and its subsidiaries can access accurate and validated information regarding its water consumption. This data serves as a basis for analyzing group-wide water usage patterns, identifying opportunities for efficiency improvements, and setting water conservation targets within the organization. Doğan Holding and its subisidaries employ a measurement method that ensures accurate and verifiable data across all sources. his approach ensures transparency, facilitates benchmarking, and enables racking of progress in sustainable water management practices.*

## Water withdrawals quality

### (9.2.1) % of sites/facilities/operations

*Select from:*

☑ 100%

### (9.2.2) Frequency of measurement

*Select from:*

☑ Continuously

## (9.2.3) Method of measurement

*The metering system installed at the point of water entry allows Doğan Holding and its subsidiaries to accurately monitor and record the volume of water withdrawn from the all sources, including third-party suppliers (grid), groundwater and seawater, for their 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 water management practices.*

## (9.2.4) Please explain

*By obtaining water usage data directly from metering systems and the third-party grid suppliers, Doğan Holding and its subsidiaries can access accurate and validated information regarding its water consumption. This data serves as a basis for analyzing group-wide water usage patterns, identifying opportunities for efficiency improvements, and setting water conservation targets within the organization. Doğan Holding and its subisidaries employ a measurement method that ensures accurate and verifiable data across all sources. his approach ensures transparency, facilitates benchmarking, and enables tracking of progress in sustainable water management practices.*

# Water discharges – total volumes

## (9.2.1) % of sites/facilities/operations

*Select from:*

☑ 100%

## (9.2.2) Frequency of measurement

*Select from:*

☑ Continuously

## (9.2.3) Method of measurement

*The metering system installed at the point of water entry allows Doğan Holding and its subsidiaries to accurately monitor and record the volume of water withdrawn from the all sources, including third-party suppliers (grid), groundwater and seawater, for their 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 water management practices.*

## (9.2.4) Please explain

*By obtaining water usage data directly from metering systems and the third-party grid suppliers, Doğan Holding and its subsidiaries can access accurate and validated information regarding its water consumption. This data serves as a basis for analyzing group-wide water usage patterns, identifying opportunities for efficiency improvements, and setting water conservation targets within the organization. Doğan Holding and its subisidaries employ a measurement method that ensures accurate and verifiable data across all sources. This approach ensures transparency, facilitates benchmarking, and enables tracking of progress in sustainable water management practices.*

# Water discharges – volumes by destination

## (9.2.1) % of sites/facilities/operations

*Select from:*

☑ 100%

## (9.2.2) Frequency of measurement

*Select from:*

☑ Continuously

## (9.2.3) Method of measurement

*The metering system at the water entry point enables Doğan Holding and its subsidiaries to accurately monitor volumes of water withdrawn from the grid for operations and discharged mainly to municipal sewers and seawater. This system provides a reliable basis to track and report withdrawals by source and discharges by destination, ensuring transparency and accountability in the company's water management practices.*

## (9.2.4) Please explain

*By obtaining water discharge data through metering systems and subsidiary-level reporting, Doğan Holding and its subsidiaries can access accurate and validated information regarding water volumes discharges to municipal sewer systems and to seawater. This data serves as a basis for analyzing water usage patterns, identifying opportunities for efficiency improvements, and setting water conservation targets within the Group. Doğan Holding and its subsidiaries employ a measurement method that ensures accurate and verifiable data on consumption by source and discharges by destination. This approach ensures transparency, facilitates benchmarking, and enables the company to track its progress in sustainable water management practices.*

# Water discharges – volumes by treatment method

## (9.2.1) % of sites/facilities/operations

*Select from:*

☑ 100%

## (9.2.2) Frequency of measurement

*Select from:*

☑ Continuously

## (9.2.3) Method of measurement

*The metering system at the water entry point enables Doğan Holding and its subsidiaries to accurately monitor water withdrawn from the grid for operations and discharged mainly to municipal sewers and seawater. This system provides a reliable mechanism to track and report withdrawals by source and discharges by destination, ensuring transparency and accountability in the company's water management practices.*

## (9.2.4) Please explain

*By obtaining discharge data through metering systems and subsidiary-level reporting, Doğan Holding and its subsidiaries can access accurate and validated information regarding water volumes discharges to municipal sewer systems and to seawater. This data serves as a basis for analyzing water usage patterns, identifying opportunities for efficiency improvements, and setting water conservation targets within the Group. Doğan Holding and its subsidiaries employ a measurement method that ensures accurate and verifiable data on consumption by source and discharges by destination. This approach ensures transparency, facilitates benchmarking, and enables the company to track its progress in sustainable water management practices.*

### Water discharge quality – by standard effluent parameters

## (9.2.1) % of sites/facilities/operations

*Select from:*

☑ 100%

## (9.2.2) Frequency of measurement

*Select from:*

☑ Continuously

## (9.2.3) Method of measurement

*The metering system at the water entry point allows Doğan Holding and its subsidiaries to accurately monitor water withdrawn from the grid for operational needs and discharged mainly to municipal sewers and seawater. This method provides a reliable mechanism to track and report withdrawals by source and discharges by destination, ensuring transparency and accountability in the company's water management practices.*

## (9.2.4) Please explain

*By obtaining discharge data through metering systems and subsidiary-level reporting,and its subsidiaries can access accurate and validated information regarding water volumes discharges to municipal sewer systems and to seawater. In addition to volume measurement, discharge quality is regularly monitored to ensure compliance with legal requirements and environmental standards. Where necessary, pre-treatment or treatment processes are applied before discharge to minimize environmental impact. This data serves as a basis for analyzing water discharge patterns, identifying opportunities for efficiency improvements, and setting water conservation targets within the Group. Doğan Holding and its subsidiaries employ a measurement method that ensures accurate and verifiable data on consumption by source and discharges by destination.This approach ensures transparency, facilitates benchmarking, and enables the company to track its progress in sustainable water management practices.*

# Water discharge quality – emissions to water (nitrates, phosphates, pesticides, and/or other priority substances)

## (9.2.1) % of sites/facilities/operations

*Select from:*

☑ Not relevant

## (9.2.4) Please explain

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

# Water discharge quality – temperature

## (9.2.1) % of sites/facilities/operations

*Select from:*

☑ 100%

## (9.2.2) Frequency of measurement

*Select from:*

☑ Continuously

## (9.2.3) Method of measurement

*The metering system at the water entry point enables Doğan Holding and its subsidiaries to monitor and record water withdrawn from the grid for operational needs and discharged mainly to municipal sewers and seawater. This system provides a reliable mechanism to track and report withdrawals by source and discharges by destination, ensuring transparency and accountability in the company's water management practices.*

## (9.2.4) Please explain

*By obtaining discharge data through metering systems and subsidiary-level reporting, Doğan Holding and its subsidiaries access accurate information on water volumes discharged to municipal sewer systems and seawater. Beyond volume, discharge quality is regularly monitored to ensure compliance with legal and environmental standards. Where required, pre-treatment or treatment processes are applied before discharge to reduce environmental impacts. The collected data supports analysis of discharge patterns, identification of efficiency opportunities, and the setting of measurable water conservation targets across the Group. A standardized measurement method ensures reliable and verifiable data on water consumption by source and discharges by destination. This transparent approach facilitates benchmarking, enables comparability among subsidiaries, and allows the company to track and demonstrate continuous progress in sustainable water management.*

# Water consumption – total volume

## (9.2.1) % of sites/facilities/operations

*Select from:*

☑ 100%

## (9.2.2) Frequency of measurement

*Select from:*

☑ Continuously

## (9.2.3) Method of measurement

*The metering system at the water entry point enables Doğan Holding and its subsidiaries to monitor and record water consumed across operations, including withdrawals from suppliers, groundwater, and seawater, as well as discharges to municipal sewers and seawater. This method provides a reliable mechanism to track and report total consumption, ensuring transparency and accountability in water management practices.*

## (9.2.4) Please explain

*By obtaining water withdrawal and discharge data directly from the third-party grid and water metering systems, Doğan Holding and its subsidiaries can access accurate and validated information regarding its water consumption. This data covers all relevant sources and destinations and serves as a basis for analyzing group-wide consumption patterns, identifying opportunities for efficiency improvements, and setting water conservation targets. Doğan Holding and its subsidiaries employ a measurement method that ensures accurate and verifiable data on its water consumption across the Group. This approach ensures transparency, facilitates benchmarking, and enables the company to track its progress in sustainable water management practices.*

# Water recycled/reused

## (9.2.1) % of sites/facilities/operations

*Select from:*

☑ 100%

## (9.2.2) Frequency of measurement

*Select from:*

☑ Continuously

## (9.2.3) Method of measurement

*The metering system installed at the point of water entry, together with monitoring at discharge and recycling units, allow Doğan Holding and its subsidiaries to accurately monitor and record the volume of water recycled and where applicable reused within operations. This method provides a reliable measurement mechanism to track and report recycled/reused water alongside withdrawals and discharges, ensuring transparency and accountability in the company's water management practices.*

## (9.2.4) Please explain

*By consolidating data from metering systems and subsidiary-level reporting, Doğan Holding and its subsidiaries can access accurate and validated information on recycled water volumes and where feasible, on reused water. This data serves as a basis for analyzing water usage patterns, identifying opportunities for efficiency improvements, and setting water conservation targets within the Group. Doğan Holding and its subsidiaries employ a measurement method that ensures accurate and verifiable data on recycled and reused water. This approach ensures transparency, facilitates benchmarking, and enables the company to track its progress in sustainable water management practices.*

# The provision of fully-functioning, safely managed WASH services to all workers

## (9.2.1) % of sites/facilities/operations

*Select from:*

☑ 100%

## (9.2.2) Frequency of measurement

*Select from:*

☑ Continuously

## (9.2.3) Method of measurement

*The metering system at the water entry point allows Doğan Holding and its subsidiaries to monitor and record water withdrawn from all sources, including third-party suppliers, groundwater, and seawater, as well as relevant discharges. This method provides a reliable mechanism to track and report water use and discharge, ensuring transparency and accountability in the company's water management practices.*

## (9.2.4) Please explain

*By obtaining water usage data directly from metering systems and the third-party grid suppliers, Doğan Holding and its subsidiaries can access accurate and validated information regarding its water consumption. This data serves as a basis for analyzing group-wide water usage patterns, identifying opportunities for efficiency improvements, and setting water conservation targets within the organization. Doğan Holding and its subisidaries employ a measurement method that ensures accurate and verifiable data across all sources. This approach ensures transparency, facilitates benchmarking, and enables tracking of progress in sustainable water management practices.*
*[Fixed row]*

# (9.2.2) What are the total volumes of water withdrawn, discharged, and consumed across all your operations, how do they compare to the previous reporting year, and how are they forecasted to change?

## Total withdrawals

## (9.2.2.1) Volume (megaliters/year)

*725.72*

## (9.2.2.2) Comparison with previous reporting year

*Select from:*

☑ Much higher

## (9.2.2.3) Primary reason for comparison with previous reporting year

*Select from:*

☑ Mergers and acquisitions

## (9.2.2.4) Five-year forecast

*Select from:*

☑ Much higher

## (9.2.2.5) Primary reason for forecast

*Select from:*

☑ Mergers and acquisitions

## (9.2.2.6) Please explain

*Following the acquisition of Gümüştaş by Doğan Holding, the Group has observed a significant upward trend in overall water consumption. While classifying the magnitude of change from the previous year data, we consider the change up to /-5% as “about the same”, 5% to 20% as higher/lower”, and above 20% as “much higher/lower”. As the increase in withdrawal amounts was calculated to be 271% it is classified as “much higher/lower”. Once the integration of the company into the Holding’s systems and processes is fully completed, targeted actions and efficiency measures will be implemented to reduce water consumption and improve sustainable water management performance.*

# Total discharges

## (9.2.2.1) Volume (megaliters/year)

*86.37*

## (9.2.2.2) Comparison with previous reporting year

*Select from:*

☑ Much lower

### (9.2.2.3) Primary reason for comparison with previous reporting year

*Select from:*

☑ Mergers and acquisitions

### (9.2.2.4) Five-year forecast

*Select from:*

☑ Much lower

### (9.2.2.5) Primary reason for forecast

*Select from:*

☑ Mergers and acquisitions

### (9.2.2.6) Please explain

*The reduction in discharges despite higher withdrawals is mainly explained by increased process water consumption, recycling and reuse practices, and efficiency improvements. A considerable share of the withdrawn water is consumed within operations rather than released, leading to lower discharge volumes even though withdrawals rose. While classifying the magnitude of change from the previous year data, we consider the change up to /-5% as “about the same”, 5% to 20% as higher/lower”, and above 20% as “much higher/lower”. As the decrease in discharge amounts was calculated to be 46% it is classified as “much lower”.*

## Total consumption

### (9.2.2.1) Volume (megaliters/year)

*639.36*

### (9.2.2.2) Comparison with previous reporting year

*Select from:*

☑ Much higher

## (9.2.2.3) Primary reason for comparison with previous reporting year

*Select from:*

☑ Mergers and acquisitions

## (9.2.2.4) Five-year forecast

*Select from:*

☑ Much higher

## (9.2.2.5) Primary reason for forecast

*Select from:*

☑ Mergers and acquisitions

## (9.2.2.6) Please explain

*The significant increase in total consumption compared to the previous year is due to the acquisition of Gümüştaş, which considerably raised water demand across the Group. Going forward, with the integration of the company and the implementation of targeted efficiency measures and water management projects, we expect a reduction in consumption. Therefore, our five-year forecast is set as 'Lower', with the primary reason being efficiency improvements. While classifying the magnitude of change from the previous year data, we consider the change up to /-5% as "about the same", 5% to 20% as higher/lower", and above 20% as "much higher/lower". [Fixed row]*

# (9.2.4) Indicate whether water is withdrawn from areas with water stress, provide the volume, how it compares with the previous reporting year, and how it is forecasted to change.

## (9.2.4.1) Withdrawals are from areas with water stress

*Select from:*

☑ Yes

## (9.2.4.2) Volume withdrawn from areas with water stress (megaliters)

*725.72*

## (9.2.4.3) Comparison with previous reporting year

*Select from:*

☑ This is our first year of measurement

## (9.2.4.4) Primary reason for comparison with previous reporting year

*Select from:*

☑ Other, please specify :As this is the first year of calculating this data, comparison with the previous year is not possible.

## (9.2.4.5) Five-year forecast

*Select from:*

☑ Lower

## (9.2.4.6) Primary reason for forecast

*Select from:*

☑ Increase/decrease in efficiency

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

*100.00*

## (9.2.4.8) Identification tool

*Select all that apply*

☑ WRI Aqueduct

☑ WWF Water Risk Filter

## (9.2.4.9) Please explain

*As Doğan Holding, we are mindful of the locations where our and our subsidiaries' facilities are primarily situated, with a significant presence around İstanbul, İzmir, Ankara, Niğde. According to the WRI Aqueduct 2030 Business-as-Usual scenario, these regions are classified as facing extremely high levels of water stress.Consequently, while we continue to monitor our water withdrawals in these regions, we place a strong emphasis on efficient water use, conservation, and wastewater management to minimize the additional pressure on already water-stressed areas. 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 classified as facing extremely high levels of water stress requires us to place even greater emphasis on responsible water management. In these areas, we focus on efficient water usage, conservation, and wastewater treatment to help reduce the additional pressure on local water resources. By proactively managing water in high stress areas, we aim to minimize our environmental impact and contribute to the overall sustainability and resilience of the communities where we operate our commitment to responsible water management extends beyond compliance and includes continuous monitoring of evolving water conditions, adopting sustainable practices, and working closely with stakeholders to address emerging water challenges. As Doğan Holding, we remain dedicated to sustainable business practices and responsible water management, ensuring that our operations contribute positively to the preservation and responsible use of water resources. We continuously monitor the evolving water landscape and adapt our practices accordingly, taking into account local water conditions and collaborating with stakeholders to address emerging challenges.*
*[Fixed row]*

## (9.2.7) Provide total water withdrawal data by source.

## Fresh surface water, including rainwater, water from wetlands, rivers, and lakes

### (9.2.7.1) Relevance

*Select from:*
☑ Not relevant

### (9.2.7.5) Please explain

*N/A*

## Brackish surface water/Seawater

### (9.2.7.1) Relevance

*Select from:*
☑ Relevant

## (9.2.7.2) Volume (megaliters/year)

*18.04*

## (9.2.7.3) Comparison with previous reporting year

*Select from:*

☑ This is our first year of measurement

## (9.2.7.4) Primary reason for comparison with previous reporting year

*Select from:*

☑ Other, please specify :N/A

## (9.2.7.5) Please explain

*Data on seawater withdrawals for Doğan Holding and its subsidiaries has been collected starting from the 2024 reporting year. The reported volumes are based on Doğan Holding's direct measurements and recorded data. Not all subsidiaries have seawater withdrawals; therefore, the figures have been consolidated and reported at the Group level.*

### Groundwater – renewable

## (9.2.7.1) Relevance

*Select from:*

☑ Not relevant

## (9.2.7.5) Please explain

*N/A*

### Groundwater – non-renewable

## (9.2.7.1) Relevance

*Select from:*

☑ Relevant

## (9.2.7.2) Volume (megaliters/year)

*590.29*

## (9.2.7.3) Comparison with previous reporting year

*Select from:*

☑ This is our first year of measurement

## (9.2.7.4) Primary reason for comparison with previous reporting year

*Select from:*

☑ Other, please specify :N/A

## (9.2.7.5) Please explain

*Data on non-renewable groundwater withdrawals for Doğan Holding and its subsidiaries has been collected starting from the 2024 reporting year. The reported volumes are based on Doğan Holding's direct measurements and recorded data. Not all subsidiaries have non-renewable groundwater withdrawals; therefore, the figures have been consolidated and reported at the Group level.*

### Produced/Entrained water

## (9.2.7.1) Relevance

*Select from:*

☑ Not relevant

## (9.2.7.5) Please explain

*N/A*

### Third party sources

## (9.2.7.1) Relevance

*Select from:*

☑ Relevant

## (9.2.7.2) Volume (megaliters/year)

*117.38*

## (9.2.7.3) Comparison with previous reporting year

*Select from:*

☑ Lower

## (9.2.7.4) Primary reason for comparison with previous reporting year

*Select from:*

☑ Divestment from water intensive technology/process

## (9.2.7.5) Please explain

*The decrease in water withdrawals from third-party sources compared to the previous reporting year is mainly due to the divestment from water-intensive technologies and processes. As a result of these operational changes, overall reliance on municipal water supply has been reduced.*
*[Fixed row]*

# (9.2.8) Provide total water discharge data by destination.

## Fresh surface water

## (9.2.8.1) Relevance

*Select from:*

☑ Not relevant

## (9.2.8.5) Please explain

*N/A*

### Brackish surface water/seawater

## (9.2.8.1) Relevance

*Select from:*
☑ Relevant

## (9.2.8.2) Volume (megaliters/year)

*24.13*

## (9.2.8.3) Comparison with previous reporting year

*Select from:*
☑ This is our first year of measurement

## (9.2.8.4) Primary reason for comparison with previous reporting year

*Select from:*
☑ Other, please specify :N/A

## (9.2.8.5) Please explain

*Data on seawater discharges for Doğan Holding and its subsidiaries has been collected starting from the 2024 reporting year. The reported volumes are based on Doğan Holding's direct measurements and recorded data. Not all subsidiaries have seawater discharges; therefore, the figures have been consolidated and reported at the Group level.*

### Groundwater

## (9.2.8.1) Relevance

*Select from:*
☑ Not relevant

## (9.2.8.5) Please explain

*Third-party destinations*

## Third-party destinations

## (9.2.8.1) Relevance

*Select from:*
☑ Relevant

## (9.2.8.2) Volume (megaliters/year)

*62.23*

## (9.2.8.3) Comparison with previous reporting year

*Select from:*
☑ Lower

## (9.2.8.4) Primary reason for comparison with previous reporting year

*Select from:*
☑ Divestment from water intensive technology/process

## (9.2.8.5) Please explain

*We directly discharge our wastewater to the municipality's wastewater channel. The decrease in total discharge volumes compared to the previous year is primarily attributable to the divestment from water-intensive technologies and processes. This operational change has reduced overall water use, leading to lower wastewater generation and discharge to municipal systems.*
*[Fixed row]*

## (9.2.9) Within your direct operations, indicate the highest level(s) to which you treat your discharge.

### Tertiary treatment

### (9.2.9.1) Relevance of treatment level to discharge

*Select from:*

☑ Not relevant

### (9.2.9.6) Please explain

*Tertiary treatment is not relevant to Doğan Holding and its subsidiaries' operations, as their activities do not involve processes requiring this level of wastewater treatment*

### Secondary treatment

### (9.2.9.1) Relevance of treatment level to discharge

*Select from:*

☑ Not relevant

### (9.2.9.6) Please explain

*Secondary treatment is not relevant to Doğan Holding and its subsidiaries' operations, as their activities do not involve processes requiring this level of wastewater treatment*

### Primary treatment only

### (9.2.9.1) Relevance of treatment level to discharge

*Select from:*

☑ Not relevant

### (9.2.9.6) Please explain

*Primary treatment only is not relevant to Doğan Holding and its subsidiaries' operations, as their activities do not involve processes requiring this level of wastewater treatment*

## Discharge to the natural environment without treatment

### (9.2.9.1) Relevance of treatment level to discharge

*Select from:*

☑ Not relevant

### (9.2.9.6) Please explain

*Discharge to the natural environment without treatment is not relevant to Doğan Holding and its subsidiaries' operations, as their activities do not generate wastewater requiring such discharge.*

## Discharge to a third party without treatment

### (9.2.9.1) Relevance of treatment level to discharge

*Select from:*

☑ Relevant

### (9.2.9.2) Volume (megaliters/year)

*62.24*

### (9.2.9.3) Comparison of treated volume with previous reporting year

*Select from:*

☑ Higher

### (9.2.9.4) Primary reason for comparison with previous reporting year

*Select from:*

☑ Mergers and acquisitions

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

*Select from:*

☑ 100%

## (9.2.9.6) Please explain

*The reported volume of 62.24 ML reflects improved data accuracy and monitoring practices implemented in the 2024 reporting year. As measurement methodologies were enhanced compared to previous years, the variance with the previously reported figure cannot be fully attributed to operational changes. For this reason, the primary driver of the year-on-year difference has been marked as unknown. In addition, it should be noted that this discharge is directed to the municipal sewer system. However, before being released into the receiving environment, it undergoes treatment through the sewer network and is ultimately discharged in compliance with applicable legal requirements and regulatory water quality standards.*

### Other

## (9.2.9.1) Relevance of treatment level to discharge

*Select from:*

☑ Not relevant

## (9.2.9.6) Please explain

*Not relevant*
*[Fixed row]*

# (9.3) In your direct operations and upstream value chain, what is the number of facilities where you have identified substantive water-related dependencies, impacts, risks, and opportunities?

### Direct operations

## (9.3.1) Identification of facilities in the value chain stage

*Select from:*

☑ Yes, we have assessed this value chain stage and identified facilities with water-related dependencies, impacts, risks, and opportunities

## (9.3.2) Total number of facilities identified

*1*

## (9.3.3) % of facilities in direct operations that this represents

*Select from:*

☑ 76-99

## (9.3.4) Please explain

*We define a facility as a distinct operational site, and data is consolidated at the subsidiary level to ensure consistency in Group-level reporting. Substantive water-related dependencies and risks have been identified in the mining sector, specifically at our subsidiary Gümüştaş. This facility is located in a water-stressed region and its operations are highly dependent on water availability. A facility-specific risk assessment has been carried out, and water stress has been considered a substantive risk at the Group level.*

### Upstream value chain

## (9.3.1) Identification of facilities in the value chain stage

*Select from:*

☑ No, we have not assessed this value chain stage for facilities with water-related dependencies, impacts, risks, and opportunities, and are not planning to do so in the next 2 years

*[Fixed row]*

### (9.3.1) For each facility referenced in 9.3, provide coordinates, water accounting data, and a comparison with the previous reporting year.

### Row 1

## (9.3.1.1) Facility reference number

*Select from:*

☑ Facility 1

## (9.3.1.2) Facility name (optional)

*Gümüştaş Madencilik Ticaret A.Ş.*

## (9.3.1.3) Value chain stage

*Select from:*

☑ Direct operations

## (9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

*Select all that apply*

☑ Risks

## (9.3.1.5) Withdrawals or discharges in the reporting year

*Select from:*

☑ Yes, withdrawals only

## (9.3.1.6) Reason for no withdrawals and/or discharges

*All water withdrawn is consumed within processes such as ore processing, dust suppression, and evaporation. The water is either incorporated into products, lost through evaporation, or retained in tailing storage facilities. As a result, no direct discharge to municipal systems, surface water or seawater occurs, and therefore discharges are reported as zero.*

## (9.3.1.7) Country/Area & River basin

Turkey

☑ Coruh

## (9.3.1.8) Latitude

*37.54592*

## (9.3.1.9) Longitude

*34.58737*

## (9.3.1.10) Located in area with water stress

*Select from:*

☑ Yes

## (9.3.1.13) Total water withdrawals at this facility (megaliters)

*511.35*

## (9.3.1.14) Comparison of total withdrawals with previous reporting year

*Select from:*

☑ This is our first year of measurement

## (9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

*0*

## (9.3.1.16) Withdrawals from brackish surface water/seawater

*0*

## (9.3.1.17) Withdrawals from groundwater - renewable

*0*

## (9.3.1.18) Withdrawals from groundwater - non-renewable

*511.35*

## (9.3.1.19) Withdrawals from produced/entrained water

*0*

## (9.3.1.20) Withdrawals from third party sources

*0*

## (9.3.1.27) Total water consumption at this facility (megaliters)

*511.35*

## (9.3.1.28) Comparison of total consumption with previous reporting year

*Select from:*

☑ This is our first year of measurement

## (9.3.1.29) Please explain

*Water withdrawal volumes have been directly monitored at the facility level and consolidated at the Group level. No discharge volumes were reported for this facility; therefore, total water consumption is equal to total withdrawals. As 2024 represents the first year of measurement, year-on-year comparison can not be provided [Add row]*

# (9.3.2) For the facilities in your direct operations referenced in 9.3.1, what proportion of water accounting data has been third party verified?

## Water withdrawals – total volumes

## (9.3.2.1) % verified

*Select from:*

☑ 76-100

## (9.3.2.2) Verification standard used

*The third party verification was conducted in accordance with the relevant assurance standards to ensure the accuracy, completeness, and reliability of the reported information.*

## Water withdrawals – volume by source

### (9.3.2.1) % verified

*Select from:*

☑ Not verified

### (9.3.2.3) Please explain

*This data has not been externally verified as it was collected and disclosed at a reportable level for the first time in 2024. Starting from the next reporting period, these datasets will be included within the scope of third-party verification to ensure accuracy, completeness, and reliability.*

## Water withdrawals – quality by standard water quality parameters

### (9.3.2.1) % verified

*Select from:*

☑ Not verified

### (9.3.2.3) Please explain

*This data has not been externally verified as it was collected and disclosed at a reportable level for the first time in 2024. Starting from the next reporting period, these datasets will be included within the scope of third-party verification to ensure accuracy, completeness, and reliability.*

## Water discharges – total volumes

### (9.3.2.1) % verified

*Select from:*

☑ 76-100

### (9.3.2.2) Verification standard used

*The third party verification was conducted in accordance with the relevant assurance standards to ensure the accuracy, completeness, and reliability of the reported information.*

## Water discharges – volume by destination

### (9.3.2.1) % verified

*Select from:*

☑ Not verified

### (9.3.2.3) Please explain

*This data has not been externally verified as it was collected and disclosed at a reportable level for the first time in 2024. Starting from the next reporting period, these datasets will be included within the scope of third-party verification to ensure accuracy, completeness, and reliability.*

## Water discharges – volume by final treatment level

### (9.3.2.1) % verified

*Select from:*

☑ Not verified

### (9.3.2.3) Please explain

*This data has not been externally verified as it was collected and disclosed at a reportable level for the first time in 2024. Starting from the next reporting period, these datasets will be included within the scope of third-party verification to ensure accuracy, completeness, and reliability.*

## Water discharges – quality by standard water quality parameters

### (9.3.2.1) % verified

*Select from:*

☑ Not verified

### (9.3.2.3) Please explain

*This data has not been externally verified as it was collected and disclosed at a reportable level for the first time in 2024. Starting from the next reporting period, these datasets will be included within the scope of third-party verification to ensure accuracy, completeness, and reliability.*

## Water consumption – total volume

### (9.3.2.1) % verified

*Select from:*

☑ 76-100

### (9.3.2.2) Verification standard used

*The third party verification was conducted in accordance with the relevant assurance standards to ensure the accuracy, completeness, and reliability of the reported information.*
*[Fixed row]*

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

### (9.5.1) Revenue (currency)

*84.5*

### (9.5.2) Total water withdrawal efficiency

*0.12*

### (9.5.3) Anticipated forward trend

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

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

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

*[Fixed row]*

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

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

*Select from:*

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

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

*Select from:*

☑ Important but not an immediate business priority

### (9.14.4) Please explain

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

## (9.15) Do you have any water-related targets?

*Select from:*
☑ Yes

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

### Water pollution

### (9.15.1.1) Target set in this category

*Select from:*
☑ Yes

### Water withdrawals

### (9.15.1.1) Target set in this category

*Select from:*
☑ Yes

### Water, Sanitation, and Hygiene (WASH) services

### (9.15.1.1) Target set in this category

*Select from:*
☑ No, but we plan to within the next two years

### (9.15.1.2) Please explain

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

## Other

### (9.15.1.1) Target set in this category

*Select from:*
☑ Yes
*[Fixed row]*

## (9.15.2) Provide details of your water-related targets and the progress made.

## Row 1

### (9.15.2.1) Target reference number

*Select from:*
☑ Target 1

### (9.15.2.2) Target coverage

*Select from:*
☑ Organization-wide (direct operations only)

### (9.15.2.3) Category of target & Quantitative metric

Water use efficiency
☑ Other water use efficiency, please specify :Water replenishment rate (%)

### (9.15.2.4) Date target was set

*12/30/2021*

### (9.15.2.5) End date of base year

*12/30/2022*

## (9.15.2.6) Base year figure

*0*

## (9.15.2.7) End date of target year

*12/30/2030*

## (9.15.2.8) Target year figure

*100*

## (9.15.2.9) Reporting year figure

*2*

## (9.15.2.10) Target status in reporting year

*Select from:*

☑ Underway

## (9.15.2.11) % of target achieved relative to base year

*2*

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

*Select all that apply*

☑ Sustainable Development Goal 6

## (9.15.2.13) Explain target coverage and identify any exclusions

*We are monitoring water data regularly at the holding and group company levels. Notable progress is being made in the real estate investments sector so far. Currently, the entire share of water recovery operation is attributed to Milta Bodrum Marina. As part of this, the boat wash water treatment system in the dock area is*

*designed to optimize the efficient use of water resources, collecting water through floor grates, treating it, and allowing for its reuse. The water recovery rate decreased from 8.19% to 2%. This decline is due to the inclusion of Gümüştaş Mining's water data in the Group's consolidated reporting, which significantly increased overall water withdrawals while recovery practices in the mining operations have not yet been implemented. Moving forward, Doğan Holding plans to enhance water recovery initiatives across all subsidiaries, including mining operations, to accelerate progress toward the 2030 target.*

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

*In 2023, total of 725.724 m3 of water had withdrawn and 18,044 m3 was recycled. The water recycling rate increased compared to 2023, total water withdrawal has also increased significantly due to the acquisition of Gümüştaş. However, the total volume of recovered water remains significant, primarily driven by initiatives in the real estate investments sector, where positive results in water recovery have been achieved.*

## (9.15.2.16) Further details of target

*Our water replenishment target, defined as "managing our entire water use in a holistic and sustainable manner through investments in reduction, treatment, and recovery programs," reflects our commitment to balancing the impacts of our operations on water resources. This approach directly covers the management of water withdrawals, aiming to return the equivalent of the water we use. In addition, through the treatment and reuse of wastewater, it also naturally contributes to the reduction of water pollution.*
*[Add row]*

# C10. Environmental performance - Plastics

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

### (10.1.1) Targets in place

*Select from:*

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

### (10.1.3) Please explain

*While Doğan Holding has not yet set formal plastics-related targets, we recognize the growing importance of addressing plastics-related impacts and risks across our business operations and value chain. In line with our broader environmental and circular economy commitments, we are currently assessing baseline data and sectoral best practices to identify material areas where we can reduce plastic usage, eliminate unnecessary and problematic plastics, and improve circularity. Building on this groundwork, we aim to establish measurable plastics-related targets within the next two years to align with both stakeholder expectations and global sustainability standards.*
*[Fixed row]*

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

## Production/commercialization of plastic polymers (including plastic converters)

### (10.2.1) Activity applies

*Select from:*

☑ No

### (10.2.2) Comment

-

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

### (10.2.1) Activity applies

*Select from:*

☑ Yes

### (10.2.2) Comment

*Our group company Sesa Packaging produces these kind of goods.*

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

### (10.2.1) Activity applies

*Select from:*

☑ No

### (10.2.2) Comment

-

## Production/commercialization of plastic packaging

### (10.2.1) Activity applies

*Select from:*

☑ No

### (10.2.2) Comment

-

## Production/commercialization of goods/products packaged in plastics

## (10.2.1) Activity applies

*Select from:*

☑ No

## (10.2.2) Comment

-

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

## (10.2.1) Activity applies

*Select from:*

☑ No

## (10.2.2) Comment

-

### Provision of waste management and/or water management services

## (10.2.1) Activity applies

*Select from:*

☑ No

## (10.2.2) Comment

-

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

## (10.2.1) Activity applies

*Select from:*
☑ No

## (10.2.2) Comment

-

### Other activities not specified

## (10.2.1) Activity applies

*Select from:*
☑ No

## (10.2.2) Comment

-
*[Fixed row]*

### (10.4) Provide the total weight of plastic durable goods and durable components produced, sold and/or used, and indicate the raw material content.

### Durable goods and durable components sold

## (10.4.1) Total weight during the reporting year (Metric tons)

*17136*

## (10.4.2) Raw material content percentages available to report

*Select all that apply*
☑ % virgin fossil-based content
☑ % virgin renewable content
☑ % pre-consumer recycled content

## (10.4.3) % virgin fossil-based content

*87*

## (10.4.4) % virgin renewable content

*10*

## (10.4.5) % pre-consumer recycled content

*3*

## (10.4.7) Please explain

*-*
*[Fixed row]*

### (10.6) Provide the total weight of waste generated by the plastic you produce, commercialize, use and/or process and indicate the end-of-life management pathways.

### Production of plastic

## (10.6.1) Total weight of waste generated during the reporting year (Metric tons)

*2176.3*

## (10.6.2) End-of-life management pathways available to report

*Select all that apply*
☑ Recycling

## (10.6.4) % recycling

*100*

## (10.6.12) Please explain

-

### Commercialization of plastic

## (10.6.1) Total weight of waste generated during the reporting year (Metric tons)

*2176.1*

## (10.6.2) End-of-life management pathways available to report

*Select all that apply*

☑ Recycling

## (10.6.4) % recycling

*100*

## (10.6.12) Please explain

-

*[Fixed row]*

## C11. Environmental performance - Biodiversity

### (11.1) Within your reporting boundary, are there any geographical areas, business units or mining projects excluded from your disclosure?

*Select from:*
☑ No

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

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

*[Fixed row]*

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

| | Does your organization use indicators to monitor biodiversity performance? | Indicators used to monitor biodiversity performance |
|---|---|---|
| | *Select from:*<br>☑ Yes, we use indicators | *Select all that apply*<br>☑ State and benefit indicators |

| | Does your organization use indicators to monitor biodiversity performance? | Indicators used to monitor biodiversity performance |
|---|---|---|
| | | ☑ Pressure indicators<br>☑ Response indicators |

*[Fixed row]*

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

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

*[Fixed row]*

## (11.5) Can you disclose the mining project area and the area of land disturbed for each of your mining projects?

### (11.5.1) Disclosing mining project area and area of land disturbed

*Select from:*

☑ No

### (11.5.2) Comment

*Doğan Holding's mining subsidiary Gümüştaş, manages land under licenses and permits granted by the relevant authorities. The total project areas include both active operational zones and surrounding lands that are not directly disturbed by mining activities. Within these licensed areas, only a portion is disturbed for activities such as ore extraction, processing facilities, infrastructure, and waste management. At present, the company tracks land disturbance in line with national regulations and rehabilitation obligations. While detailed site-specific disclosure of project areas and disturbed land is not yet available, processes are being developed to align reporting with international best practices. These include measuring the total licensed project area, identifying the portion of land directly disturbed by mining operations, and disclosing future rehabilitation commitments. Doğan Holding recognizes that managing both the disturbed and undisturbed areas under its responsibility is critical for biodiversity and ecosystem protection, and will continue to enhance monitoring and disclosure practices accordingly within the scope of it's Environmental Policy.*
*[Fixed row]*

## (11.6) Are there artisanal and small-scale mining (ASM) operations active in your mining project areas or in their area of influence?

*Select from:*

☑ No

## (11.7) Do you adopt biodiversity action plans to manage your impacts on biodiversity?

*Select from:*

☑ No

## (11.9) Have any of your projects caused, or have the potential to cause, significant adverse impact(s) on biodiversity?

## (11.9.1) Any projects caused, or have the potential to cause, significant adverse impacts on biodiversity

*Select from:*

☑ No

## (11.9.2) Comment

*Mining activities, by their nature, have the potential to cause adverse impacts on biodiversity, particularly through land disturbance, habitat alteration, and water use. Doğan Holding's mining subsidiary conducts Environmental Impact Assessments (EIA) prior to project development in line with national legislation, which identify potential biodiversity-related risks and define mitigation measures. To date, there have been no confirmed cases of significant adverse impacts on biodiversity directly attributed to the company's operations. However, the subsidiary acknowledges that the potential for such impacts exists, especially in ecologically sensitive areas. For this reason, biodiversity considerations are integrated into environmental management practices, including monitoring, rehabilitation planning, and compliance with regulatory requirements. The company is planning to enhancing biodiversity management by aligning with international best practices and developing additional frameworks, where necessary, to further reduce risks and strengthen long-term ecosystem resilience.*
*[Fixed row]*

# (11.10) Are biodiversity issues integrated into any aspects of your long-term strategic business plan, and if so how?

## Long-term business objectives

## (11.10.1) Are biodiversity-related issues integrated?

*Select from:*

☑ No, biodiversity-related issues not yet reviewed, but there are plans to do so in the next two years

## (11.10.3) Please explain

*Biodiversity-related issues have not yet been formally integrated into the company's long-term business objectives. However, recognizing the growing importance of biodiversity in sustainability strategies and investor expectations, the company has initiated internal discussions to assess how biodiversity can be systematically incorporated into strategic planning. Over the next two years, the subsidiary plans to review its biodiversity risks and opportunities, evaluate alignment with international best practices, and develop structured approaches such as biodiversity action frameworks. This will allow the organization to embed biodiversity considerations into its long-term objectives and enhance resilience against environmental and regulatory challenges.*

## Strategy for long-term objectives

## (11.10.1) Are biodiversity-related issues integrated?

*Select from:*

☑ No, biodiversity-related issues not yet reviewed, but there are plans to do so in the next two years

## (11.10.3) Please explain

*Although biodiversity-related issues have not yet been formally integrated into the company's long-term strategy, plans are in place to address this gap within the next two years. The company intends to conduct a structured review of biodiversity risks and opportunities, benchmark against international best practices, and identify how biodiversity can be embedded into strategic planning and decision-making. This approach will ensure that biodiversity considerations become part of the organization's long-term objectives, supporting both regulatory compliance and broader sustainability commitments.*

### Financial planning

## (11.10.1) Are biodiversity-related issues integrated?

*Select from:*

☑ No, biodiversity-related issues not yet reviewed, but there are plans to do so in the next two years

## (11.10.3) Please explain

*Biodiversity-related issues have not yet been explicitly considered in the company's financial planning processes. However, within the next two years, the company plans to assess potential financial implications of biodiversity risks and opportunities, including costs related to land rehabilitation, regulatory compliance, and access to sustainable financing. This planned review will help integrate biodiversity considerations into long-term financial planning and ensure alignment with evolving investor and lender expectations.*
*[Fixed row]*

### (11.11) Have you specified any measurable and time-bound targets related to your commitments to reduce or avoid impacts on biodiversity?

*Select from:*

☑ No

## (11.12) Has your organization adopted avoidance and/or minimization as strategies to prevent or mitigate significant adverse impacts on biodiversity?

*Select from:*

☑ No

## (11.13) Have significant impacts on biodiversity been mitigated through restoration?

### (11.13.1) Have significant impacts on biodiversity been mitigated through restoration?

*Select from:*

☑ No

### (11.13.2) Comment

*Doğan Holding has not yet undertaken restoration activities to mitigate significant biodiversity impacts. While current operations are designed to avoid or minimize biodiversity-related impacts wherever possible, restoration initiatives have not been required to date. The Group continues to monitor its environmental footprint and is exploring opportunities to implement biodiversity restoration or enhancement measures in the future as part of its long-term sustainability strategy.*
*[Fixed row]*

## (11.14) Have significant residual impacts of your projects been compensated through biodiversity offsets?

### (11.14.1) Have residual impacts been compensated through biodiversity offsets?

*Select from:*

☑ No

### (11.14.2) Comment

*Doğan Holding has not implemented biodiversity offsets to compensate for residual impacts. Current operations are structured to avoid or minimize biodiversity impacts, and no significant residual impacts requiring offsets have been identified to date. The Group continues to evaluate its environmental footprint and will consider offsetting measures in the future where necessary, in line with its long-term sustainability and biodiversity management strategy.*
*[Fixed row]*

## (11.15) Is your organization implementing or supporting additional conservation actions?

### (11.15.1) Implementing or supporting additional conservation actions?

*Select from:*
☑ No

### (11.15.2) Comment

*The company is not currently implementing or supporting additional conservation actions beyond those required by regulatory compliance. While existing environmental management practices focus on mitigating operational impacts and ensuring compliance with legal requirements, there are no formal programs in place that provide additional biodiversity benefits at this time. The company recognizes the potential value of such initiatives and may consider opportunities for additional conservation actions in the future as part of its broader sustainability strategy.*
*[Fixed row]*

## (11.16) Do your mining projects have closure plans in place?

### (11.16.1) Are there closure plans in place?

*Select from:*
☑ No

### (11.16.2) Comment

*Currently, our mining projects do not have formal closure plans in place. However, closure-related risks and impacts are recognized as material issues, and we intend to develop structured mine closure strategies in the future to ensure compliance with regulatory requirements, minimize potential environmental and social legacies, and support long-term biodiversity outcomes.*
*[Fixed row]*

## (11.17) Can you disclose the area rehabilitated (in total and in the reporting year) for each of your mining projects?

### (11.17.1) Disclosing area rehabilitated (in total and in the reporting year)

*Select from:*
☑ No

### (11.17.2) Comment

*Rehabilitation activities are recognized as an important part of environmental management, and we plan to establish monitoring and reporting mechanisms in the future to track and disclose rehabilitation performance more effectively.*
*[Fixed row]*

## (11.18) Do you collaborate or engage in partnerships with non-governmental organizations to promote the implementation of your biodiversity-related goals and commitments?

| | Collaborating or partnering with NGOs | Comment |
|---|---|---|
| | *Select from:*<br>☑ No | - |

*[Fixed row]*

## (11.20) Do you engage with other stakeholders to further the implementation of your policies concerning biodiversity?

*Select from:*

☑ No

## C13. Further information & sign off

### (13.1) Indicate if any environmental information included in your CDP response (not already reported in 7.9.1/2/3, 8.9.1/2/3/4, and 9.3.2) is verified and/or assured by a third party?

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

*Select from:*

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

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

*Select from:*

☑ Judged to be unimportant or not relevant

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

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

### (13.2) 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.

| | Additional information |
|---|---|
| | *N/A* |

*[Fixed row]*

## (13.3) Provide the following information for the person that has signed off (approved) your CDP response.

### (13.3.1) Job title

*Chief Financial Officer - CFO, Member of Executive Committee*

### (13.3.2) Corresponding job category

*Select from:*

☑ Chief Financial Officer (CFO)

*[Fixed row]*

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

*Select from:*

☑ No