



DOĞAN ŞİRKETLER GRUBU HOLDİNG A.Ş.

CDP Corporate Questionnaire 2026

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.

[Read full terms of disclosure](#)

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:

☒ TRY

(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 2025, we employ 7,160 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. Implemented in 2023, the Doğan Impact Plan provides a strategic framework for the sustainability transformation and development of the Holding and Group companies. It is structured around three key pillars: Investing in the Future, Investing into Society, and Investing in the Planet. Developed to advance our sustainability agenda through a more systematic, integrated, and measurable approach, the Plan serves as a roadmap for our transformation journey. Under Investing in the Future, we prioritize sustainability-focused R&D and innovation, product lifecycle management, digital transformation, and data security. Investing in Society focuses on our social impacts, including employee well-being and development, occupational health and safety, customer satisfaction, and supply chain management. Investing in the Planet addresses key environmental priorities such as decarbonization, energy and water management, waste reduction, biodiversity, and the responsible use of natural resources. As a publicly traded company, we are committed to transparency and regularly monitor, measure, and disclose our

sustainability performance, in line with Türkiye's public disclosure regulations. Through the Doğan Impact Plan, we engage with our key stakeholders, including suppliers, customers, employees, and investors, to ensure that our sustainability priorities reflect their expectations. Our strong governance structure and ongoing collaborations support our efforts to create long-term value while minimizing environmental and social risks. 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 aim to lead by example in Türkiye and beyond, building a sustainable and resilient business model that addresses today's challenges while contributing to a 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.

	End date of reporting year	Alignment of this reporting period with your financial reporting period	Indicate if you are providing emissions data for past reporting years
	12/31/2025	Select from: ☒ Yes	Select from: ☒ No

[Fixed row]

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

93680389000

(1.5) Provide details on your reporting boundary.

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

[Fixed row]

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

ISIN code - bond

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

ISIN code - equity

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ Yes

(1.6.2) Provide your unique identifier

TRADOHOL91Q8

CUSIP number

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

Ticker symbol

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ 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:

☒ Yes

(1.6.2) Provide your unique identifier

789000J24Q4JM3H6UX22

D-U-N-S number

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

Other unique identifier

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

[Add row]

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

Select all that apply

☒ Türkiye

(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

Gümüşhane

(1.18.3) Share (%)

75

(1.18.4) Country/Area

Select from:

☒ Turkey

(1.18.5) Latitude

40.46843

(1.18.6) Longitude

(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 (Kırkpavli) 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. A resource update study conducted by RPM Global 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 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. In 2025, the Gümüşhane Kırkpavli Project produced a total of 53,500 tonnes of run-of-mine ore. During the year, 35,469.43 tonnes of run-of-mine ore were fed to the processing plant, while 51,784 tonnes were sold or dispatched. The year-end run-of-mine ore stock amounted to 7,238.18 tonnes. In 2025, the operation produced 98,620 grams of gold and 262,085 grams of silver in enriched/processed products. The recovery rates were 74.85% for gold and 41.91% for silver.

Row 2

(1.18.1) Mining project ID

Select from:

☒ Project 2

(1.18.2) Name

Niğde Bolkar

(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

☒ 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. 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. 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 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. In 2025, the Niğde Bolkar Project produced a total of 459,538.60 tonnes of run-of-mine ore, all of which was sulphide ore. During the year, 482,336.90 tonnes of run-of-mine ore were fed to the processing plant, while 459,538.60 tonnes were sold or dispatched. The year-end run-of-mine ore stock amounted to 61,627.92 tonnes. In 2025, the operation produced 6,249.60 dry tonnes of lead (Pb) concentrate, 32,497.53 dry tonnes of zinc (Zn) concentrate and 105,623.12 dry tonnes of iron (Fe) concentrate. No gold or silver production was recorded during the year.

[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: ☒ Yes	Select from: ☒ Both risks and opportunities	Select from: ☒ Yes

[Fixed row]

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

Row 1

(2.2.2.1) Environmental issue

Select all that apply

- ☒ Climate change
- ☒ Water
- ☒ Plastics

☒ Biodiversity

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

Select all that apply

☒ Dependencies

☒ Impacts

☒ Risks

☒ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☒ Direct operations

☒ Upstream value chain

☒ Downstream value chain

(2.2.2.4) Coverage

Select from:

☒ Full

(2.2.2.5) Supplier tiers covered

Select all that apply

☒ Tier 1 suppliers

(2.2.2.6) 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 Systems

Other

- ☒ Scenario analysis

(2.2.2.15) Risk types and criteria considered

Acute physical

- ☒ Heat wave
- ☒ 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

Market

- ☒ Changing customer behavior

Reputation

- ☒ Increased concern and/or negative feedback from partners and stakeholders

Technology

- ☒ Transition to lower emissions technology and products

Liability

- ☒ Non-compliance with regulations and legislation

(2.2.2.16) Partners and stakeholders considered

Select all that apply

- ☒ Customers
- ☒ Employees
- ☒ Local communities
- ☒ Suppliers

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

Select from:

- ☒ No

(2.2.2.18) 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 2025, 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 assesses potential biodiversity and environmental impacts associated with its activities, considering relevant legislation, Environmental Impact Assessment (EIA) commitments, site monitoring results, and environmental management practices. Potential direct and indirect impacts on land use and habitat integrity, biological resources, flora and fauna populations, aquatic ecosystems, water quality, soil, and landscape are assessed within the EIA, together with measures to mitigate identified impacts. Site monitoring is conducted in line with EIA commitments and applicable regulations to support the ongoing assessment and management of environmental and biodiversity impacts. Rehabilitation is considered as part of Gümüştaş's approach to biodiversity and land management. ADT-1, which reached the end of its operational life in 2018, was included in a closure and rehabilitation process. The EIA and related environmental assessments considered potential impacts on habitat, flora and fauna populations, aquatic ecosystems, and other biological resources, together with measures to mitigate these impacts. The rehabilitated area is also being considered for repurposing without additional land use, supporting the objective of reducing pressure on new land areas. In terms of waste management, wastes are classified according to their types, managed under appropriate conditions, and transferred to licensed facilities with the aim of reducing their potential impacts on the environment and ecosystems. Gümüştaş also participated in the workshop process conducted in 2026 within the scope of the Sustainable Mining Initiative/TSM approach. The systematic integration of sustainable mining practices into operational processes is considered a long-term development objective. In this context, the company aims to further systematize its efforts to identify and monitor biodiversity impacts, strengthen its impact mitigation approach, and improve rehabilitation practices in the coming period.

Row 2

(2.2.3.1) Mining project ID

Select from:

☒ Project 2

(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
- ☒ Endemic species
- ☒ Natural habitats
- ☒ Ecosystem services

(2.2.3.6) Baseline biodiversity data available

Select from:

- ☒ Yes

(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 assesses potential biodiversity and environmental impacts associated with its activities, considering relevant legislation, Environmental Impact Assessment (EIA) commitments, site monitoring results, and environmental management practices. Potential direct and indirect impacts on land use and habitat integrity, biological resources, flora and fauna populations, aquatic ecosystems, water quality, soil, and landscape are assessed within the EIA, together with measures to mitigate identified impacts. Site monitoring is conducted in line with EIA commitments and applicable regulations to support the ongoing assessment and management of environmental and biodiversity impacts. Rehabilitation is considered as part of Gümüştaş's approach to biodiversity and land management. ADT-1, which reached the end of its operational life in 2018, was included in a closure and rehabilitation process. The EIA and related environmental assessments considered potential impacts on habitat, flora and fauna populations, aquatic ecosystems, and other biological resources, together with measures to mitigate these impacts. The rehabilitated area is also being considered for repurposing without additional land use, supporting the objective of reducing pressure on new land areas. In terms of waste management, waste is classified according to their types, managed under appropriate conditions, and transferred to licensed facilities with the aim of reducing their potential impacts on the environment and ecosystems. Gümüştaş also participated in the workshop process conducted in 2026 within the scope of the Sustainable Mining Initiative/TSM approach. The systematic integration of sustainable mining practices into operational processes is considered a long-term development objective. In this context, the company aims to further systematize its efforts to identify and monitor biodiversity impacts, strengthen its impact mitigation approach, and improve rehabilitation practices in the coming period.

[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). 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 a substantive effect. The metrics used in this definition include the frequency of the effect occurring, the time horizon over which the effect occurs, and the likelihood of the effect occurring. Frequency of effect occurring: The risks are assessed annually as part of our financial and operational review process. Time horizon over which the effect occurs: Risks are assessed over short-, medium-, and long-term time horizons as defined in question 2.1 (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 a substantive effect. The metrics used in this definition include the same factors as risks: frequency of occurrence, time horizon, and likelihood. Frequency of effect occurring: Opportunities are assessed annually as part of our strategic planning cycle. Time horizon over which the effect occurs: Opportunities are evaluated over short-, medium-, and long-term horizons, similar to risks (0-3 years, 3-6 years and 6+ years). Opportunities with substantive financial impact are expected to be realized 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 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:

☒ Yes, we identify and classify our potential water pollutants

(2.5.2) Details of policies and processes in place to identify and classify potential water pollutants

As Doğan Holding, we identify potential water pollutants associated with the operations of our subsidiary, Gümüştaş Mining, through periodic wastewater analyses and water footprint assessments. Key wastewater parameters assessed include Total Suspended Solids (TSS), Chemical Oxygen Demand (COD), Biochemical Oxygen Demand (BOD), and pH. At the Bolkar-2 site, additional parameters including lead, total cyanide (CN), iron, zinc, sulfate, mercury, cadmium, copper, and total chromium are also analyzed. The results are used in grey water footprint calculations conducted in accordance with ISO 14046. Where certain facilities are exempt from wastewater analysis requirements, applicable regulatory limit values are used in the assessment. These analyses support the identification and evaluation of potential water pollution risks associated with Gümüştaş Mining's direct operations.

[Fixed row]

(2.5.1) Describe how your organization minimizes the adverse impacts of potential water pollutants on water ecosystems or human health associated with your activities.

Row 1

(2.5.1.1) Water pollutant category

Select from:

☒ Inorganic pollutants

(2.5.1.2) Description of water pollutant and potential impacts

Inorganic pollutants monitored include lead, total cyanide, iron, zinc, sulfate, mercury, cadmium, copper and total chromium, particularly at the Bolkar-2 site. Depending on their concentration, these substances may adversely affect aquatic ecosystems through toxicity and deterioration of water quality, while certain substances such as lead, mercury, cadmium and cyanide may also pose potential risks to human health.

(2.5.1.3) Value chain stage

Select all that apply

☒ Direct operations

(2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply

- ☒ Improving wastewater treatment processes/capacity
- ☒ Water recycling

(2.5.1.5) Indicators for measuring and evaluating the success of the procedure

Select all that apply

- ☒ Compliance with discharge permits / regulatory limits
- ☒ % of wastewater reused or recycled, please specify :Reuse (approximately 60% of process water was reused within the process in 2025)

(2.5.1.6) Please explain

Process water is recycled within the operation through a closed-loop system, reducing freshwater consumption and the potential impacts associated with water use and wastewater generation. The effectiveness of the procedure is evaluated through regular monitoring and analysis of wastewater quality against applicable discharge permit conditions and regulatory limits.

Row 2

(2.5.1.1) Water pollutant category

Select from:

- ☒ Other nutrients and oxygen demanding pollutants

(2.5.1.2) Description of water pollutant and potential impacts

Chemical Oxygen Demand (COD) and Biochemical Oxygen Demand (BOD) are monitored as indicators of the oxygen demand of wastewater. Elevated organic loads may reduce dissolved oxygen concentrations in receiving water environments and potentially adversely affect aquatic organisms. Total Suspended Solids (TSS) are also monitored as an indicator of wastewater quality and may contribute to increased turbidity and sedimentation if discharged at elevated concentrations. The simple arithmetic averages of the values used in the assessment were approximately 50.6 mg/L for TSS, 125.3 mg/L for COD, 44.1 mg/L for BOD, and 8.2 for pH. It should be noted that for certain facilities exempt from wastewater analysis, applicable regulatory limit values were used instead of actual analytical results, while maximum values were used where multiple analyses were available.

(2.5.1.3) Value chain stage

Select all that apply

- ☒ Direct operations

(2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply

- ☒ Improving wastewater treatment processes/capacity
- ☒ Water recycling

(2.5.1.5) Indicators for measuring and evaluating the success of the procedure

Select all that apply

- ☒ Compliance with discharge permits / regulatory limits
- ☒ % of wastewater reused or recycled, please specify :Reuse (approximately 60% of process water was reused within the process in 2025)

(2.5.1.6) Please explain

Process water is recycled within the operation through a closed-loop system, reducing freshwater consumption and the potential impacts associated with water use and wastewater generation. The effectiveness of the procedure is evaluated through regular monitoring and analysis of wastewater quality against applicable discharge permit conditions and regulatory limits.

[Add 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 1% Total Asset 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

☒ Türkiye

(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:

☒ 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

☒ Long-term

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

Select from:

☒ Likely

(3.1.1.14) Magnitude

Select from:

☒ Low

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

Wildfire risk is considered one of the physical climate risks that could increase in the long term due to rising temperatures and drought trends in regions where renewable energy assets are located. Should the risk materialize, the financial impact is likely to arise primarily from potential physical damage to the affiliated company's energy production assets and the resulting production outages. Analyses conducted specifically for the Galata Wind assets under the SSP2-4.5 and SSP5-8.5 climate scenarios indicate that this risk has the potential to have a limited financial impact on the operational continuity and asset value of the relevant facilities. Because the relevant assets are covered by insurance and preventive investments and operational measures have been implemented to mitigate fire risk, the financial impact of this risk on the holding company remains negligible.

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

Select from:

☒ Yes

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

0

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

138000000

(3.1.1.25) Explanation of financial effect figure

The TRY 138 million financial effect represents the portfolio-level present value of expected losses arising from physical climate risks across Galata Wind's Taşpınar, Şah, Mersin, Çorum and Erzurum assets. The assessment covers wildfire effects under the SSP2-4.5 and SSP5-8.5 scenarios for the 2025–2030 and 2031–2050 time horizons. Expected direct impacts on asset values together with indirect revenue impacts from operational downtime, efficiency losses and maintenance delays, were estimated using a Hazard × Exposure × Vulnerability model. The projected losses were consolidated at portfolio level to derive the TRY 138 million present-value financial effect.

(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

Galata Wind implements measures to enhance firefighting capabilities and site resilience at its energy production sites in response to the increasing wildfire risk. Insurance coverage and emergency plans are reviewed on a regular basis, and fire safety and response training is provided to field personnel. Insurance coverage and emergency response plans are reviewed regularly, and fire safety and response training is provided to field personnel. The cost of response reflects the annual insurance premiums paid to maintain coverage against wildfire-related physical damage and operational losses. These premiums are reviewed periodically based on site-specific risk exposure, insured asset values, and prevailing market conditions.

(3.1.1.29) Description of response

Galata Wind manages increasing wildfire risk by strengthening firefighting capabilities and site resilience across its energy production sites. Firefighting equipment is maintained in high-risk areas, while road access and fire safety infrastructure are reinforced. Insurance coverage and emergency response plans are reviewed regularly, and field personnel receive fire safety and response training. Further measures include installing protective barriers around critical equipment and increasing water supply capacity. These subsidiary-level initiatives are monitored to enhance the resilience of the renewable energy portfolio against physical climate risks.

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

☒ Türkiye

(3.1.1.7) River basin where the risk occurs

Select all that apply

☒ Other, please specify :Konya closed basin in Türkiye

(3.1.1.9) Organization-specific description of risk

By their nature, mining activities rely on intensive water use. The sector is sensitive in terms of water supply due to the high level of water consumption in basic operations such as ore processing, flotation, crushing, washing, and dust suppression. Rising temperatures due to climate change, irregular precipitation patterns, and declining groundwater levels also increase water stress risks for mining companies. The increasing water stress can reach levels that may disrupt operational continuity. Gümüştaş Mining's operating model requires significant water withdrawal, and the operational region of the company is exposed to high water stress risk. This risk is elevated to a strategic and critical level due to the fact that approximately 75% of the total water withdrawal across the Holding is attributable to Gümüştaş.

(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 stress risk is assessed as a critical physical risk that may affect operational continuity in the long term. Considering the current and projected pressures on regional water resources, the risk has the potential to impact on the company's operations and asset value. However, it is not possible to conduct a quantitative financial impact assessment at this stage due to uncertainties regarding the timing and magnitude of the impact. Given the role of the mining sector in the Holding's growth strategy, this risk is considered significant at the Holding level. Ongoing efforts within this scope are expected to reduce water access risk in the long term and support generation continuity. Efforts for more systematic monitoring and evaluation of water management data at the corporate level are expected to contribute to making the operational and financial impacts of the risk more measurable in the future, as well as identifying cost-effective mitigation options. Calculability of the financial impacts of the risk will be reassessed in the coming periods. At this stage, the risk is classified as significant and monitored accordingly.

(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)

(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 need 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

19700000

(3.1.1.28) Explanation of cost calculation

The cost calculation includes planned investments and expenditures related to sensor-based real-time monitoring systems, a centralized water data platform, improvements to water recycling and tailings storage dam water recovery, treated water reuse, rainwater infrastructure, and technical studies for groundwater resources and well efficiency. Related permitting, impact assessment and feasibility study costs are also included.

(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

☒ Türkiye

(3.1.1.9) Organization-specific description of risk

For Galata Wind's wind power plants, wind is not only a critical input for generation continuity but also a physical risk factor that can vary depending on climate change. Due to changes in the climate system, the frequency and intensity of extreme wind events may increase in some regions, while in others, changes may occur in average wind speeds or seasonal patterns. Turbines may be temporarily shut down as part of safety protocols in extreme wind conditions, while the blades, tower connections, and mechanical components may be damaged in more severe cases. In the long term, structural changes in wind regime can lead to fluctuations in annual generation volumes, thereby affecting electricity generation performance. For this reason, wind regime changes and storm risks are considered not only a risk of physical damage for Galata Wind, but also a chronic physical climate risk that could cause fluctuations in generation volume and income performance.

(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

☒ Long-term

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

Select from:

☒ Likely

(3.1.1.14) Magnitude

Select from:

☒ Low

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

Wind regimes change and storm risks are considered among the physical climate risks that could increase in the long term due to climate change in regions where renewable energy generation assets are located. Should the risk materialize, the financial impact could potentially arise from fluctuations in generation performance at the affiliated wind power plants and possible physical damage. Analyses conducted specifically on Galata Wind's assets indicate that the risk in question has the potential to have only a limited financial impact on the generation performance and asset value of the relevant facilities.

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

Select from:

☒ Yes

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

0

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

125800000

(3.1.1.25) Explanation of financial effect figure

The TRY 125.8 million financial effect represents the portfolio-level present value of expected losses arising from changes in wind regimes across Galata Wind's Taşpınar and Şah assets. The assessment covers changes in wind patterns under the SSP2-4.5 and SSP5-8.5 scenarios for the 2025–2030 and 2031–2050 time horizons. Expected revenue impacts resulting from changes in wind availability and associated electricity generation losses were estimated using a Hazard × Exposure × Vulnerability model. The projected losses were consolidated at the portfolio level to derive the TRY 125.8 million present-value financial effect.

(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

5400000

(3.1.1.28) Explanation of cost calculation

Galata Wind implements a multi-layered approach to manage wind regime change risk through data-driven monitoring, portfolio diversification and hybrid generation solutions. Advanced SCADA and meteorological systems are used to continuously monitor wind conditions and generation performance, while technical assessments support capacity factor optimization and turbine efficiency. The cost of response includes expenditures related to these monitoring systems and technical studies, as well as planned investments in hybrid generation, energy storage and the geographical and technological diversification of the generation portfolio.

(3.1.1.29) Description of response

Galata Wind manages the risk of changing wind regimes through data-driven monitoring, portfolio diversification and hybrid generation solutions. Advanced SCADA and meteorological monitoring systems are used across its wind power plants to continuously track wind conditions, analyze generation performance and support capacity factor optimization and turbine efficiency. The Company also invests in hybrid generation and energy storage solutions and plans renewable energy projects across different regions to diversify its generation portfolio and balance regional climate-related generation risks.

[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)

263800000

(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 effects 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)

41800000

(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 effects 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

Türkiye

☒ 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, where water scarcity, drought and related risks are material due to climate change and other environmental pressures. As these operations depend on reliable water availability and represent an important share of Gümüştaş's production, water-related disruptions could result in production delays, higher costs for alternative water supplies, temporary shutdowns and associated revenue losses. To manage this exposure, Doğan Holding promotes water-efficient technologies, water recycling and reuse, and contingency planning for extreme weather events. Nevertheless, the risk may remain significant unless adequate long-term investments in water resilience are implemented. Although Gümüştaş represents less than 1% of Doğan Holding's diversified portfolio and revenue distribution, its operational contribution makes water security a continuing medium- and long-term priority. Accordingly, the Group will continue to assess its water-risk exposure and incorporate relevant developments into its 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 applies a comprehensive environmental management system across its subsidiaries to support compliance with applicable water-related legislation. Water consumption and discharge are regularly monitored, and responsible practices are implemented to minimize potential environmental impacts. Periodic audits and inspections help ensure alignment with relevant national and international standards, while employee training programs strengthen awareness of water management procedures and regulatory obligations. As a result of these measures, no water-related regulatory violations were recorded during 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 is committed to preserving biodiversity and natural habitats throughout its operations. The Group's approach is guided by an environmental management framework designed to ensure compliance with relevant regulations and recognized standards. Potential impacts on ecosystems are managed through regular monitoring, responsible operational practices and continuous improvement initiatives. Periodic assessments support ongoing compliance, while employee awareness and training activities help embed environmental responsibility across the organization. Through these efforts, Doğan Holding seeks to protect biodiversity, promote sustainable land use and reinforce its environmental stewardship. No biodiversity-related regulatory violations were identified 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?

Türkiye recently adopted its first Climate Law, providing the legal basis for the Turkish Emissions Trading System (TR ETS). The draft implementing regulation, published on 22 July 2025 and opened for public consultation until early August, proposes a pilot period covering 2026–2027. The initial scope includes power generation and emission-intensive industries such as cement, steel and aluminium, focusing on facilities with annual emissions exceeding 50,000 tCO₂e. The proposed framework incorporates instruments including free allowance allocation, intensity-based emission caps, allowance banking and borrowing, a market stability reserve and the use of domestic carbon credits. Although Doğan Holding does not currently operate in sectors directly covered by the TR ETS, it closely follows developments concerning both the emerging national system and the EU Carbon Border Adjustment Mechanism (CBAM). This forward-looking approach supports the effective management of potential carbon-pricing impacts on the Group's operations and value chain. To strengthen future compliance and competitiveness, Doğan Holding is improving its GHG data infrastructure, investing in low-carbon technologies, and supporting its subsidiaries in monitoring and verifying their carbon footprints.

(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 assessment of biodiversity-related opportunities is ongoing. Gümüştaş, which joined Doğan Holding's portfolio in 2024, is the subsidiary with the most significant potential biodiversity impacts. We recognize the importance of carefully managing these site-specific impacts and protecting the ecosystems surrounding its operations. Doğan Holding is assessing all subsidiaries to identify potential biodiversity-related opportunities and determine how they can be integrated into the Group's broader sustainability strategy. This process is supported by 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. Under Doğan Holding's Environmental Policy, potential biodiversity-related opportunities will be reviewed regularly across Group companies, and appropriate actions will be developed to incorporate identified opportunities into the 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

- ☒ Türkiye

(3.6.1.8) Organization specific description

As climate-related regulatory frameworks are strengthened and carbon markets develop, renewable energy generation carries the potential to create additional economic value beyond low-carbon electricity production through carbon markets. In Türkiye, progress in preparations for the Emissions Trading System (ETS) and institutionalization of voluntary carbon markets make carbon credits a complementary revenue item for renewable energy projects that deliver verifiable emission reductions. In this context, Galata Wind's renewable energy generation activities have the potential to generate verifiable emission reductions under international carbon certification mechanisms and to earn carbon credit revenue in voluntary carbon markets. Carbon credits provide a supplementary revenue source, dependent on market conditions, in addition to the primary income from electricity generation activities.

(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

- ☒ Long-term

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

Select from:

☒ Likely (66–100%)

(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

Carbon credit revenue constitutes a market-based supplementary revenue potential in addition to Galata Wind's primary income from renewable energy generation activities. This revenue item has the potential to generate cash flow relatively independent of electricity generation volumes and electricity prices, thus contributing to the diversification of the Company's income structure. Assessments conducted specifically for Galata Wind's assets indicate that carbon credits carry upside revenue potential depending on the development of voluntary carbon markets, carbon prices and the strengthening of the regulatory framework. However, their impact on revenue may vary across different periods due to uncertainties associated with carbon market conditions. For Galata Wind, which generated 527,248 tCO₂e of carbon credits in 2025, projections of potential additional revenue were examined using voluntary carbon market forecasts developed by Bloomberg New Energy Finance (BNEF).

(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)

291900000

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

729600000

(3.6.1.23) Explanation of financial effect figures

The financial effect figure was estimated based on the 527,248 tCO₂e of carbon credits generated by Galata Wind in 2025 and voluntary carbon market price projections developed by Bloomberg New Energy Finance (BNEF). The assessment applied forecast carbon price ranges of USD 13–146 per tonne for 2030 and

USD 13–238 per tonne for 2050 to the relevant carbon credit volume to estimate potential supplementary revenue. The calculation also considered different market scenarios, supply-and-demand dynamics, evolving government climate policies and broader macroeconomic conditions.

(3.6.1.24) Cost to realize opportunity

730750000

(3.6.1.25) Explanation of cost calculation

Doğan Holding's subsidiary, Galata Wind, had a total installed electricity generation capacity of 354.2 MW in 2025 and targets increasing this capacity to 500 MW in 2026. In addition to expanding renewable energy generation, these capacity additions may create supplementary revenue opportunities through participation in voluntary carbon markets. As the existing operational assets are certified under international mechanisms such as the Gold Standard and VCS-Verra (Verified Carbon Standard), additional turbines and/or photovoltaic panels may also be eligible for voluntary carbon markets, provided that the validation and verification of emission reductions from renewable energy generation are maintained. Realizing this opportunity requires expenditures related to capacity investments, project development, certification, verification and auditing. Accordingly, the estimated total cost of the planned new installations is approximately TRY 2,320 million. Furthermore, maintaining validation and verification procedures for eligible projects until the end of their respective crediting periods, which have an average remaining term of 10 years, is expected to require an annual operating cost of TRY 15 million, including auditing, consultancy, reporting and certification expenses.

(3.6.1.26) Strategy to realize opportunity

Galata Wind plans to realize this opportunity by increasing its installed capacity from 354.2 MW in 2025 to a targeted 500 MW in 2026. For new capacity additions, the Company also plans to apply international verification mechanisms, such as the Verified Carbon Standard (VCS) and Gold Standard, to certify emission reductions from renewable energy generation. These additional verified emission reductions may subsequently be monetized as carbon credits, creating supplementary revenue streams. The strategy also includes comprehensive project development, risk assessment and operational planning to support the timely and cost-efficient achievement of both capacity growth and carbon market participation objectives..

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

☒ Türkiye

(3.6.1.6) River basin where the opportunity occurs

Select all that apply

☒ Other, please specify :All relevant river basins located in Türkiye

(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:

☒ Likely (66–100%)

(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 flow, 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)

0

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

41800000

(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

19700000

(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)

729600000

(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)

41800000

(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:

☒ Yes, and it is publicly available

(4.1.5) Briefly describe what the policy covers

The policy covers the representation of women on the Board of Directors and across management levels within Doğan Group. It sets a target of at least 30% female representation on the Board and in management by 2030 and provides for annual monitoring of progress.

(4.1.6) Attach the policy (optional)

(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 value chain engagement
- ☒ Monitoring the implementation of the business strategy
- ☒ Overseeing reporting, audit, and verification processes
- ☒ Monitoring the implementation of a climate transition plan
- ☒ Overseeing and guiding the development of a business strategy
- ☒ Overseeing and guiding acquisitions, mergers, and divestitures
- ☒ Monitoring supplier compliance with organizational requirements
- ☒ Monitoring compliance with corporate policies and/or commitments
- ☒ Overseeing and guiding the development of a climate transition plan
- ☒ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities
- ☒ Other, please specify :Overseeing and guiding public policy engagement
- ☒ Approving corporate policies and/or commitments
- ☒ Overseeing and guiding public policy engagement
- ☒ Reviewing and guiding innovation/R&D priorities
- ☒ Approving and/or overseeing employee incentives
- ☒ Overseeing and guiding major capital expenditures

(4.1.2.7) Please explain

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 | ☒ Approving corporate policies and/or commitments |
| ☒ Overseeing and guiding scenario analysis | ☒ Overseeing and guiding public policy engagement |
| ☒ Overseeing the setting of corporate targets | ☒ Reviewing and guiding innovation/R&D priorities |
| ☒ Monitoring progress towards corporate targets | ☒ Approving and/or overseeing employee incentives |
| ☒ Overseeing and guiding value chain engagement | ☒ Overseeing and guiding major capital expenditures |
| ☒ Monitoring the implementation of the business strategy | |
| ☒ Overseeing reporting, audit, and verification processes | |
| ☒ Monitoring the implementation of a climate transition plan | |
| ☒ Overseeing and guiding the development of a business strategy | |

- ☒ Overseeing and guiding acquisitions, mergers, and divestitures
- ☒ Monitoring supplier compliance with organizational requirements
- ☒ Monitoring compliance with corporate policies and/or commitments
- ☒ Overseeing and guiding the development of a climate transition plan
- ☒ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

(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: ☒ Yes
Water	Select from: ☒ Yes
Biodiversity	Select from: ☒ 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 (Vice President, Corporate Communications and Sustainability), 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

10

(4.5.3) Please explain

Doğan Holding includes monetary incentives for senior leadership, including the CEO, CFO, Business Development Executives, CHRO, and the President (Vice President, Corporate Communications and Sustainability), for achieving environmental performance objectives linked to climate-related initiatives. These incentives are aligned with the overall sustainability strategy of the group. Climate-related targets account for more than 10% of the total scorecard weighting applicable to these senior leadership positions. 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

10

(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 the President (Vice President, Corporate Communications and Sustainability) 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. Water-related targets account for more than 10% of the total scorecard weighting applicable to these senior leadership positions.

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 the President (Vice President, Corporate Communications and Sustainability) for achieving environmental performance objectives linked to climate and water-related initiatives. The Group considers biodiversity a material environmental topic, and its related initiatives are strengthened and broadened on a year-on-year basis.

[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: ☒ 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

Climate-specific commitments

- ☒ Commitment to 100% renewable energy
- ☒ Commitment to not invest in fossil-fuel expansion

Water-specific commitments

- ☒ Commitment to control/reduce/eliminate water pollution
- ☒ Commitment to reduce water consumption volumes
- ☒ Commitment to reduce water withdrawal volumes
- ☒ Commitment to safely managed WASH in local communities

(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 the Paris Agreement
- ☒ Yes, in line with Sustainable Development Goal 6 on Clean Water and Sanitation
- ☒ 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

dohol-responsible-investment-policy.pdf,DOHOL - Environmental 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 2025, we completed our first reporting under the United Nations Principles for Responsible Investment (UN PRI), further strengthening our responsible investment approach.

[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

Yes

☒ Yes, we engaged directly with policy makers

☒ Yes, we engaged indirectly through, and/or provided financial or in-kind support to a trade association or other intermediary organization or individual whose activities could influence policy, law, or regulation

(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:

☒ Yes, the intermediary organization we engage through is registered

(4.11.6) Types of transparency register your organization is registered on

Select all that apply

☒ Non-government register

(4.11.7) Disclose the transparency registers on which your organization is registered & the relevant ID numbers for your organization

TUSIAD-Turkish Industry & Business Association (REG Number: 38870176589-43)

(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 TUSIAD (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

Türkiye Sustainability Reporting Standards (TSRS)

(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

Engagement and Influence: Our engagement with relevant stakeholders in 2025 was informed by the practical implementation of TSRS and the need to share experiences and provide feedback. During the reporting year, our organization participated in an event organized by the Zero Waste Association, where we shared our experiences and perspectives on TSRS. We also prepared a memo outlining feedback and considerations on TSRS for COP-related discussions. These engagements enabled us to share implementation experiences and provide feedback on sustainability reporting requirements. Our engagement also included participation as one of the pilot companies in SARP, a platform established by the Public Oversight, Accounting and Auditing Standards Authority (KGK) to facilitate sustainability disclosures. As a company preparing TSRS-compliant sustainability disclosures and participating in the 2025 SARP pilot, we were among the initial users of the platform and maintained communication with KGK regarding our experience. Through this engagement, we provided practical feedback to support the platform's efficient functioning and usability. Through these engagements, we aim to influence the effective implementation of TSRS by sharing practical experiences and providing feedback to relevant stakeholders. In particular, we seek to support the continuous improvement of TSRS-related processes and reporting mechanisms by communicating implementation challenges, user experiences and areas for improvement. Intended Outcomes support the continuous improvement and effective implementation of TSRS while enhancing the alignment of our environmental data, governance and reporting processes with TSRS requirements By incorporating

practical experience and feedback into our engagement with relevant stakeholders, we aim to strengthen the quality, consistency and effectiveness of sustainability reporting processes. Measuring Success: We measure the success of our engagement through progress in increasing compliance with TSRS reporting requirements, improving the alignment and quality of our environmental data, governance and reporting processes, and minimizing challenges encountered during audit and verification processes. We also monitor our ability to meet applicable regulatory and reporting requirements and use feedback obtained through our engagement activities to identify and address areas for improvement in TSRS implementation.

(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

[\[Add row\]](#)

(4.11.2) Provide details of your indirect engagement on policy, law, or regulation that may (positively or negatively) impact the environment through trade associations or other intermediary organizations or individuals in the reporting year.

Row 1

(4.11.2.1) Type of indirect engagement

Select from:

☒ Indirect engagement via other intermediary organization or individual

(4.11.2.2) Type of organization or individual

Select from:

☒ Trust or foundation

(4.11.2.3) State the organization or position of individual

As Doğan Holding, we participated in the COP31 High-Level Climate Champion Private Sector Consultations Series meeting, organized in collaboration with the Zero Waste Foundation, UN Global Compact Türkiye, and the United Nations in Türkiye. The Zero Waste Foundation supports collaboration among the public sector, private sector, international organizations and civil society in the COP31 process.

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☒ Climate change

☒ Water

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☒ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☒ Yes, we publicly promoted their current position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

Our position is consistent with the Zero Waste Foundation's focus on advancing the circular economy and strengthening multi-stakeholder collaboration to support climate action. The Foundation's engagement in 2026 included convening private-sector consultations ahead of COP31, where policy proposals, innovative practices and collaboration models to accelerate the transition to a circular economy were discussed, including waste management and resource recovery, green technologies, financing and policy mechanisms. As a participant, Doğan Holding contributed its private-sector perspective to these discussions and shared its experience and feedback, supporting the development of practical proposals to inform the COP31 process.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

0

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☒ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on 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

(4.12.1.2) Is your publication in line with a standard or framework?

Select from:

- ☒ Yes

(4.12.1.3) Standard or framework the publication is in line with

Select all that apply

- ☒ GRI

(4.12.1.4) Environmental issues covered in publication

Select all that apply

- ☒ Climate change
- ☒ Water
- ☒ Biodiversity

(4.12.1.5) Status of the publication

Select from:

- ☒ Complete

(4.12.1.6) Content elements

Select all that apply

- | | |
|--|---|
| ☒ Strategy | ☒ Public policy engagement |
| ☒ Governance | ☒ Climate-related targets |
| ☒ Risks & Opportunities | ☒ Water accounting figures |
| ☒ Value chain engagement | ☒ Greenhouse gas emissions figures |
| ☒ Dependencies & Impacts | ☒ Content of environmental policies |

(4.12.1.7) Page/section reference

Strategy: 16-17 Sustainability targets: 21 Stakeholder participation: 22 Governance: 23-26 Risk & Opportunity Management: 27-28 Greenhouse gas emission figures: 44 Water accounting figures: 47

(4.12.1.8) Attach the relevant publication

dogan-holding-sustainability-report-2025.pdf

(4.12.1.9) 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

The assessment of water-related risks combines water stress information with the SSP2-4.5 and SSP5-8.5 climate pathways used in Doğan Holding's broader physical climate scenario analysis. These pathways allow the Holding to assess how water stress may evolve under relatively controlled and high-emissions climate futures. The analysis is subject to uncertainties related to local hydrological conditions, future climate patterns and the availability of site-specific data.

(5.1.1.11) Rationale for choice of scenario

The approach was selected to assess water stress within the same scenario framework applied to Doğan Holding's other physical climate risks. Combining water-related risk information with SSP2-4.5 and SSP5-8.5 enables Holding to evaluate potential changes in water availability and operational exposure under different warming trajectories, particularly for operations with relatively high dependence on water resources.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☒ RCP 4.5

(5.1.1.2) 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:

☒ 2.0°C - 2.4°C

(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

The SSP2-4.5 pathway represents a relatively controlled, middle-of-the-road scenario in which global socioeconomic trends broadly continue, and greenhouse gas emissions gradually decline over time. Under this pathway, global average temperature increase is expected to remain broadly within 2–3°C above pre-industrial levels by 2100. Doğan Holding uses this scenario to assess the potential impacts of physical climate risks, including forest fires, changing wind regimes and water stress. The analysis considers uncertainties related to the timing and magnitude of climate impacts, differences in exposure across Holding's diverse operations, and

the availability of location-specific climate data. Scenario results are assessed across the Holding's short-, medium- and long-term horizons, with 2050 additionally considered for long-term climate projections.

(5.1.1.11) Rationale for choice of scenario

The SSP2-4.5 pathway was selected to assess the resilience of Doğan Holding's operations under a relatively controlled, middle-of-the-road climate trajectory. As a widely recognized IPCC pathway integrating both socioeconomic developments and greenhouse gas concentration trajectories, it enables the Holding to assess how physical risks may evolve under moderate warming conditions. The scenario is particularly relevant to the assessment of forest fire, changing wind regime and water stress risks across exposed Group companies and supports long-term strategic planning and resilience-related decision-making.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☒ RCP 8.5

(5.1.1.2) 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:

- ☒ 4.0°C 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

The SSP5-8.5 pathway represents a high-emissions and high-warming future characterized by continued fossil fuel dependency, rapidly increasing greenhouse gas emissions and limited effectiveness of global climate policies. Under this pathway, global average temperatures are projected to increase by approximately 4°C or more above pre-industrial levels by 2100, resulting in heightened exposure to physical climate risks. Doğan Holding uses this pathway to assess the potential impacts of risks including forest fires, changing wind regimes and water stress under more severe climate conditions. Key uncertainties relate to the magnitude and geographic distribution of physical impacts and differences in exposure across Holding's diverse operations. The analysis considers Holding's short-, medium- and long-term horizons, as well as climate projections to 2050.

(5.1.1.11) Rationale for choice of scenario

The SSP5-8.5 pathway was selected to test the resilience of Doğan Holding's operations under a high-emissions and severe physical-risk scenario. It provides a conservative basis for assessing how increasingly adverse climate conditions could affect exposed assets, operations and resource dependencies. In particular, the scenario supports the assessment of forest fire, changing wind regime and water stress risks and enables the Holding to identify areas where additional adaptation measures, infrastructure investments and resilience planning may be required.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

- ☒ BNEF NEO

(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

☒ Market

(5.1.1.6) Temperature alignment of scenario

Select from:

☒ 1.5°C or lower

(5.1.1.7) Reference year

2025

(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)

Regulators, legal and policy regimes

☒ Global regulation

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

The analysis assumes that voluntary carbon markets will continue to develop alongside evolving climate policies, corporate decarbonization commitments and demand for verifiable, high-quality carbon credits. BloombergNEF scenarios are used to assess how different market structures, climate policy trajectories and levels of market development could influence future carbon credit prices and demand, and therefore the supplementary revenue potential associated with renewable energy generation. Key uncertainties relate to carbon market supply and demand, future carbon prices, regulatory and certification requirements, credit quality and broader macroeconomic conditions. In addition, the volume of credits ultimately available for sale may vary depending on certification methodologies and verification outcomes. Therefore, scenario results are not treated as precise forecasts but as a range of possible market developments used to support forward-looking assessment of the carbon credit opportunity.

(5.1.1.11) Rationale for choice of scenario

BloombergNEF scenarios were selected because they provide forward-looking market-based projections for voluntary carbon markets under different climate policy, market development and demand conditions. This is particularly relevant to Galata Wind, whose renewable energy generation activities can generate verifiable emission reductions eligible for certification under internationally recognized mechanisms such as VCS and Gold Standard. The scenarios enable Doğan Holding to assess how changes in carbon prices and market demand could affect the potential supplementary revenue generated from carbon credits over the medium and long term. Considering multiple BNEF market outlooks also allows Holding to evaluate the opportunity across a range of possible market conditions rather than relying on a single carbon price assumption, supporting more resilient strategic and financial planning.

[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 influence of the scenario analysis on the selected business processes

The scenario analysis has strengthened Doğan Holding's identification, assessment and management of climate-related risks and opportunities and provides input to long-term strategic and financial planning. The SSP2-4.5 and SSP5-8.5 pathways were used to assess the potential evolution and financial implications of key physical risks, including forest fires, changing wind regimes and water stress, under different warming trajectories. The findings support the prioritization of resilience measures and investment decisions across exposed Group companies, including preventive infrastructure, monitoring systems and measures aimed at strengthening resource security and operational continuity. In addition, BloombergNEF scenarios were used to assess potential developments in voluntary carbon markets and the related revenue opportunity from carbon credits. By assessing Holding's operations, investment plans, supply chain and resource dependencies under different climate futures, scenario analysis contributes to the resilience of Holding's business model and supports the integration of climate-related considerations into strategic decision-making.

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 influence of the scenario analysis on the selected business processes

The scenario analysis has strengthened the identification and assessment of water-related risks across Doğan Holding's operations, particularly for activities with higher exposure to water stress. The SSP2-4.5 and SSP5-8.5 pathways provide a forward-looking basis for assessing how changing climate conditions may affect water availability, operational continuity and resource dependencies under different warming trajectories. The findings support the prioritization of water efficiency, recycling and recovery measures, improved monitoring systems and actions aimed at reducing dependence on raw water resources. Scenario analysis also informs investment and operational planning related to water infrastructure and resource security, thereby supporting the long-term resilience of exposed Group companies.
[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

(5.2.20) 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)

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

[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

- ☒ Physical risks
- ☒ Transition 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

- ☒ Physical risks
- ☒ Transition 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

- ☒ Physical risks
- ☒ Transition 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

- ☒ Physical risks
- ☒ Transition 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 | ☒ Access to capital |
| ☒ Revenues | ☒ Capital expenditures |
| ☒ Liabilities | ☒ Acquisitions and divestments |
| ☒ Direct costs | |

- ☒ Indirect costs

(5.3.2.2) Effect type

Select all that apply

- ☒ Physical risks
- ☒ Transition risks
- ☒ Opportunities

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

Select all that apply

- ☒ Climate change
- ☒ Water

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

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

[Add row]

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

	Identification of spending/revenue that is aligned with your organization's climate transition
	Select from: ☒ No, but we plan to in the next two years

[Fixed row]

(5.9) 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

During the reporting year, water-related CAPEX increased primarily in connection with investments and planned improvements aimed at strengthening water efficiency, recycling and monitoring our operations. These include initiatives to enhance process water recovery, improve the reuse of treated water, strengthen rainwater management infrastructure and introduce sensor-based systems for the real-time monitoring of surface water, groundwater and water consumption. We

anticipate water-related CAPEX to continue increasing in the next reporting year as further investments are planned to reduce reliance on raw water, improve recycling and recovery rates, assess alternative and sustainable water sources, and enhance existing water infrastructure. Water-related OPEX also increased during the reporting year, reflecting higher costs associated with the operation, maintenance and monitoring of water management systems, as well as water quality monitoring and technical studies.

[Fixed row]

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

Carbon

(5.10.1) Use of internal pricing for this environmental externality

Select from:

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

(5.10.2) Primary reason for not pricing this environmental externality

Select from:

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

(5.10.3) Explain why your organization does not price this environmental externality

We do not have an internal carbon price defined in investment and decision-making processes. 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.

Water

(5.10.1) Use of internal pricing for this environmental externality

Select from:

☒ Yes

Other

(5.10.1) Use of internal pricing for this environmental externality

Select from:

☒ No, and we do not plan to in the next two years

[Fixed row]

(5.10.2) Provide details of your organization's internal price on water.

Row 1

(5.10.2.1) Type of pricing scheme

Select from:

☒ Implicit price

(5.10.2.2) Objectives for implementing internal price

Select all that apply

☒ Drive water-related investment

☒ Drive water efficiency

☒ Identify and seize low-water impact opportunities

(5.10.2.3) Factors beyond current market price are considered in the price

Select from:

☒ Yes

(5.10.2.4) Factors considered when determining the price

Select all that apply

☒ Benchmarking against peers

☒ Price with substantive impact on business decisions

(5.10.2.5) Calculation methodology and assumptions made in determining the price

The internal water price is determined using an implicit pricing approach that considers the costs associated with water-related investments and operational measures, together with the volume of water recovered through these initiatives. The calculation reflects expenditures related to projects aimed at improving water efficiency, increasing water recovery and reuse, strengthening monitoring systems, and enhancing water-related infrastructure. The methodology assumes that the costs associated with these measures provide a reasonable basis for estimating the internal value of recovered water and for supporting the evaluation of water-related investments and operational decisions. The resulting value is used as an internal reference rather than as a market-based water tariff and may be reassessed as water recovery performance, investment requirements and operating conditions evolve.

(5.10.2.6) Stages of the value chain covered

Select all that apply

☒ Direct operations

(5.10.2.7) Pricing approach used – spatial variance

Select from:

☒ Uniform

(5.10.2.9) Pricing approach used – temporal variance

Select from:

☒ Static

(5.10.2.11) Minimum actual price used (currency per cubic meter)

8.02

(5.10.2.12) Maximum actual price used (currency per cubic meter)

8.83

(5.10.2.13) Business decision-making processes the internal water price is applied to

Select all that apply

☒ Capital expenditure

☒ Impact management

☒ Operations

- ☒ Procurement
- ☒ Opportunity management

(5.10.2.14) Internal price is mandatory within business decision-making processes

Select from:

- ☒ No

(5.10.2.15) Pricing approach is monitored and evaluated to achieve objectives

Select from:

- ☒ Yes

(5.10.2.16) Details of how the pricing approach is monitored and evaluated to achieve your objectives

The internal water pricing approach is monitored in conjunction with the performance and development of water-related initiatives across operations. This includes projects aimed at increasing water recovery and reuse, improving water efficiency, strengthening water monitoring, and enhancing water-related infrastructure. The approach supports the evaluation and prioritization of investments and operational measures intended to reduce raw water dependency and strengthen long-term water resilience.

[Add 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:

- ☒ Yes

(5.11.2) Environmental issues covered

Select all that apply

- ☒ Climate change

Customers

(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

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]

(5.11.1) Does your organization assess and classify suppliers according to their dependencies and/or impacts on the environment?

Climate change

(5.11.1.1) Assessment of supplier dependencies and/or impacts on the environment

Select from:

☒ Yes, we assess the dependencies and/or impacts of our suppliers

(5.11.1.2) Criteria for assessing supplier dependencies and/or impacts on the environment

Select all that apply

☒ Contribution to supplier-related Scope 3 emissions

(5.11.1.3) % Tier 1 suppliers assessed

Select from:

☒ 1-25%

(5.11.1.4) Define a threshold for classifying suppliers as having substantive dependencies and/or impacts on the environment

Doğan Holding adopts a holistic assessment approach covering its own structure and value chain but does not define a fixed quantitative threshold. Each company operates within an independent value chain structure specific to its own area of activity. As an example, one electricity generation subsidiary, Galata Wind, classifies suppliers as Low, Medium, or High Risk. High-risk suppliers enter Risky Supplier Monitoring, triggering audits and corrective action plans.

(5.11.1.5) % Tier 1 suppliers meeting the threshold for substantive dependencies and/or impacts on the environment

Select from:

☒ Less than 1%

(5.11.1.6) Number of Tier 1 suppliers meeting the thresholds for substantive dependencies and/or impacts on the environment

22

[Fixed row]

(5.11.2) Does your organization prioritize which suppliers to engage with on environmental issues?

Climate change

(5.11.2.1) Supplier engagement prioritization on this environmental issue

Select from:

☒ Yes, we prioritize which suppliers to engage with on this environmental issue

(5.11.2.2) Criteria informing which suppliers are prioritized for engagement on this environmental issue

Select all that apply

☒ In line with the criteria used to classify suppliers as having substantive dependencies and/or impacts relating to climate change

☒ Suppliers' exposure or vulnerability to physical risks

(5.11.2.4) Please explain

As Doğan Holding, we are guided by the principles of trust, transparency, equality, and responsibility at every stage of these interactions, while engaging with a broad stakeholder ecosystem through our Group companies operating across various sectors. Our group companies implement different supplier management practices based on the requirements of their respective sectors and supplier structures. In supplier selection processes, factors such as environmental performance, social compliance, business continuity, contribution to the local economy, ethical business practices, and relevant certifications are considered alongside price, quality, technical capabilities, and operational suitability. Based on these assessment processes, in addition to Galata Wind (22 critical suppliers), Holding's subsidiaries have

also identified their critical suppliers: D Gayrimenkul (11), Doğan Trend Otomotiv (63), Gümüştaş Maden (14), Hepiyi Sigorta (2), Maksipak (5), and Sesa Packaging (100).

[Fixed row]

(5.11.5) Do your suppliers have to meet environmental requirements as part of your organization's purchasing process?

Climate change

(5.11.5.1) Suppliers have to meet specific environmental requirements related to this environmental issue as part of the purchasing process

Select from:

☒ Yes, environmental requirements related to this environmental issue are included in our supplier contracts

(5.11.5.2) Policy in place for addressing supplier non-compliance

Select from:

☒ Yes, we have a policy in place for addressing non-compliance

(5.11.5.3) Comment

As Doğan Holding, we consider our suppliers as an integral part of the way we conduct our business. Our Group companies implement different supplier management practices based on the requirements of their respective sectors and supplier structures. Our Group companies apply supplier management practices tailored to the specific requirements of their sectors and supplier structures. Supplier selection considers a range of environmental, social, ethical, and operational criteria, including environmental performance, social compliance, business continuity, local economic contribution, ethical business practices, and relevant certifications, alongside factors such as price, quality, technical capabilities, and operational suitability. The Group has supplier selection criteria in place across its companies, with environmental and sustainability considerations increasingly integrated into supplier assessment processes. Examples across the Group include Daiichi, Karel, Sesa Packaging, and Galata Wind, where supplier evaluations incorporate criteria such as ISO 14001 certification, sustainability-related assessments, environmental performance, and ESG considerations, in line with the requirements of their respective sectors and supplier structures.

[Fixed row]

(5.11.6) Provide details of the environmental requirements that suppliers have to meet as part of your organization's purchasing process, and the compliance measures in place.

Climate change

(5.11.6.1) Environmental requirement

Select from:

☒ Compliance with an environmental certification, please specify :ISO 14001

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

☒ Supplier scorecard or rating

(5.11.6.3) % tier 1 suppliers by procurement spend required to comply with this environmental requirement

Select from:

☒ 100%

(5.11.6.4) % tier 1 suppliers by procurement spend in compliance with this environmental requirement

Select from:

☒ 51-75%

(5.11.6.7) % tier 1 supplier-related scope 3 emissions attributable to the suppliers required to comply with this environmental requirement

Select from:

☒ 100%

(5.11.6.8) % tier 1 supplier-related scope 3 emissions attributable to the suppliers in compliance with this environmental requirement

Select from:

☒ 51-75%

(5.11.6.9) Response to supplier non-compliance with this environmental requirement

Select from:

☒ Retain and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:

☒ All suppliers compliant during the reporting period

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply

☒ Providing information on appropriate actions that can be taken to address non-compliance

(5.11.6.12) Comment

Doğan Holding and its subsidiaries consider environmental criteria in supplier selection and assessment processes. In cases of non-compliance, they engage with suppliers to drive corrective actions, and if compliance cannot be achieved, they review the continuation of the business relationship. As an example, Sesa Packaging has communicated its sustainability expectations to suppliers through a sustainability letter.

[Add row]

(5.11.7) Provide further details of your organization's supplier engagement on environmental issues.

Climate change

(5.11.7.2) Action driven by supplier engagement

Select from:

☒ Adaptation to climate change

(5.11.7.3) Type and details of engagement

Capacity building

- ☒ Provide training, support and best practices on how to measure GHG emissions
- ☒ Provide training, support and best practices on how to mitigate environmental impact
- ☒ Provide training and support for adaptation activities

(5.11.7.4) Upstream value chain coverage

Select all that apply

- ☒ Tier 1 suppliers

(5.11.7.5) % of tier 1 suppliers by procurement spend covered by engagement

Select from:

- ☒ 51-75%

(5.11.7.6) % of tier 1 supplier-related scope 3 emissions covered by engagement

Select from:

- ☒ 51-75%

(5.11.7.9) Describe the engagement and explain the effect of your engagement on the selected environmental action

At Galata Wind, one of Doğan Holding's electricity generation subsidiaries, sustainability governance activities are managed through a digital Sustainability and ESG Platform with an integrated GHG emissions calculation tool. To support value chain decarbonization, Galata Wind provides its suppliers with complimentary access to the platform, enabling them to calculate and monitor their GHG emissions with training and technical assistance. The Company also conducts regular supplier engagement activities focused on ESG, environmental sustainability, climate change, and carbon management, aiming to strengthen suppliers' sustainability capabilities and support alignment with its responsible supply chain and decarbonization objectives.

(5.11.7.10) Engagement is helping your tier 1 suppliers meet an environmental requirement related to this environmental issue

Select from:

- ☒ Yes, please specify the environmental requirement :Suppliers start using the program to calculate and monitor their GHG emissions.

(5.11.7.11) Engagement is helping your tier 1 suppliers engage with their own suppliers on the selected action

Select from:

☒ Yes

[Add 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:

☒ Customers

(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:

☒ 1-25%

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

☒ Unknown

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

Karel, one of Holding's subsidiaries, regularly engages with its key customers to address their climate- and environment-related expectations and ensure transparency regarding environmental performance across its value chain. In this context, Karel responds to assessment questionnaires through Beko's ESG portal,

reports its carbon footprint and energy consumption data to Nokia on a monthly basis, shares ESG data via Turkcell's MAP360 platform, and participates in ethical audit processes conducted with Vodafone. Through these activities, Karel monitors its customers' expectations regarding the environment, climate, and sustainability and shares the relevant data accordingly. These engagements contribute to Karel's regular monitoring of its environmental performance and climate-related data, incorporation of customer expectations into its activities, and identification of areas for environmental improvement. Within this scope, customers' sustainability and environmental assessment questionnaires are completed, while data on environmental performance, energy consumption, and greenhouse gas emissions are shared with customers at specified intervals. These engagements contribute to Karel's regular monitoring of its environmental performance and climate-related data, incorporation of customer expectations into its activities, and identification of areas for environmental improvement.

(5.11.9.6) Effect of engagement and measures of success

Customer engagements support the transparency and regular disclosure of Karel's environmental data. Through the ESG and environmental data-sharing processes conducted with Beko, Nokia, and Turkcell, customer requirements are regularly monitored, and the requested information is provided in a timely manner. The effectiveness of these engagements is measured based on the timely and complete submission of requested data and sustainability assessments, as well as the fulfillment of customers' environmental and sustainability requirements.

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.

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.

[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, a divestment

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

Ditaş Doğan Yedek Parça İmalat ve Teknik A.Ş.

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

Doğan Holding divested its 68.24% shareholding in Ditaş Doğan Yedek Parça İmalat ve Teknik A.Ş. to BDY Group İnşaat A.Ş. The share purchase agreement was signed on 26 June 2025 and the transaction was completed on 16 July 2025 after Competition Authority approval. Following completion, Doğan Holding no longer had control over the company, and its emissions were included in the reporting boundary only until the completion date, after which they were no longer consolidated in the Group's emissions calculations.

[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 boundary

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

In 2025, the Group divested Ditaş Doğan Yedek Parça İmalat ve Teknik A.Ş. on 16 July 2025. As a result, the emissions inventory boundary changed during the reporting year, and Ditaş was included in the inventory only up to the completion date of the divestment. From that date onward, the entity was removed from the reporting boundary and its post-divestment activities were no longer consolidated in the Group's emissions calculations. This change affected the scope of available activity data for the reporting year and reduced the boundary of operations included in the inventory.

[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 impact does not meet our significance threshold

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

Our policy is to recalculate base year emissions when structural changes, methodology changes, or error corrections cause a change of more than 5% in base year emissions. Although the Group completed the divestment of Ditaş Doğan Yedek Parça İmalat ve Teknik A.Ş. during the reporting year, the resulting boundary change did not have a material impact on base year emissions and did not exceed the 5% threshold. Accordingly, base year emissions have not been recalculated.

(7.1.3.5) 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
- ☒ ISO 14064-1
- ☒ The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)
- ☒ The Greenhouse Gas Protocol: Scope 2 Guidance
- ☒ The Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Standard

(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 excluded from your disclosure of climate-related data?

Select from:

☒ No

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

Scope 1

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO₂e)

7816

(7.5.3) Methodological details

For the Scope 1 calculation, data on direct emission sources, such as stationary combustion, mobile combustion, and refrigerants, are considered for all locations. The calculations were conducted in line with ISO 14064 and GHG Protocol principles.

Scope 2 (location-based)

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO₂e)

27845

(7.5.3) Methodological details

For the Scope 2 calculation, electricity consumption is measured using electricity meters and verified against the corresponding electricity invoices. The Tier 2 emission factor calculated for Türkiye is applied to the consumption data. In this calculation, the amount of electricity covered by I-REC certificates is excluded from the total electricity consumption. The calculations were conducted in line with ISO 14064 and GHG Protocol principles.

Scope 2 (market-based)

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

26628

(7.5.3) Methodological details

For the Scope 2 calculation, electricity consumption is measured using electricity meters and verified against the corresponding electricity invoices. The Tier 2 emission factor calculated for Türkiye is applied to the consumption data. Under the location-based approach, the total electricity consumption is considered in the calculation. Under the market-based approach, the electricity consumption covered by I-REC certificates is excluded from the calculation, reflecting the associated avoided emissions. The calculations were conducted in line with ISO 14064 and GHG Protocol principles.

Scope 3 category 1: Purchased goods and services

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

This category is relevant but has not yet been calculated.

Scope 3 category 2: Capital goods

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

This category is relevant but has not yet been calculated.

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

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

This category is relevant but has not yet been calculated.

Scope 3 category 4: Upstream transportation and distribution

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

This category is relevant but has not yet been calculated.

Scope 3 category 5: Waste generated in operations

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

This category is relevant but has not yet been calculated.

Scope 3 category 6: Business travel

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

1121.15

(7.5.3) Methodological details

For business travel calculation, the activity data is tracked by mileage from airline ticket purchased from contractual travel agencies and expressed in passenger-kilometres. Emission factors are sourced from the UK Government's 2024 GHG Conversion Factors, with radiative forcing included. Emissions are calculated by multiplying passenger-kilometres by the relevant emission factor and dividing by 1,000. The calculation follows the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard.

Scope 3 category 7: Employee commuting

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

(7.5.3) Methodological details

For employee commuting calculation, the activity data is monitored via kilometer-based invoices from service providers. Emission factors are sourced from the UK Government's 2024 GHG Conversion Factors. Emissions are calculated by multiplying the activity data in kilometres by the relevant emission factor in kg CO₂e/km and dividing the result by 1,000 to convert kilograms of CO₂e into tonnes of CO₂e. The calculation is conducted in accordance with the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard.

Scope 3 category 8: Upstream leased assets

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO₂e)

0

(7.5.3) Methodological details

This category is relevant but has not yet been calculated.

Scope 3 category 9: Downstream transportation and distribution

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO₂e)

0

(7.5.3) Methodological details

This category is relevant but has not yet been calculated.

Scope 3 category 10: Processing of sold products

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

This category is relevant but has not yet been calculated.

Scope 3 category 11: Use of sold products

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

This category is relevant but has not yet been calculated.

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

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

This category is relevant but has not yet been calculated.

Scope 3 category 13: Downstream leased assets

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

This category is relevant but has not yet been calculated.

Scope 3 category 14: Franchises

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

This category is relevant but has not yet been calculated.

Scope 3 category 15: Investments

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

This category is relevant but has not yet been calculated.

Scope 3: Other (upstream)

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

This category is not relevant.

Scope 3: Other (downstream)

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

*This category is not relevant.
[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)

8299

(7.6.3) Methodological details

*For scope 1 calculation, stationary combustion, mobile combustion data for all locations. According to IPCC 6th report, GWP and conversion factors were used, regarding to the consumption.
[Fixed row]*

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

Reporting year

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

28871

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

28481

(7.7.4) Methodological details

We purchase electricity from the national grid. We also purchase International Renewable Energy Certificates (I-RECs), which are used as market-based contractual instruments to substantiate our claims of renewable electricity consumption. For the market-based calculation, electricity consumption covered by I-REC certificates is assigned a zero-emission factor, while the applicable grid emission factor is used for the remaining electricity consumption. The grid emission factor is sourced from data published by the Turkish Ministry of Energy and Natural Resources.

[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

(7.8.6) 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

(7.8.6) 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

(7.8.6) 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

(7.8.6) 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

(7.8.6) 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)

1036

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Distance-based method

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

100

(7.8.6) Please explain

Business Travel is the consolidated calculation of flight data (passenger-km) from our Group companies, covering domestic short-haul flights, medium-haul flights (up to 3,700 km), and international flights.

Employee commuting

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

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

312

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Distance-based method

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

100

(7.8.6) Please explain

Employee Commuting is the consolidated calculation of commuting data from our Group companies, covering employee shuttle services, bus services, and taxi travel.

Upstream leased assets

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

Select from:

☒ Not applicable to our organization's activities

(7.8.6) Please explain

Doğan Holding's business model is not relevant for the calculation of this category in scope-3 emissions.

Downstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☒ Relevant, not yet calculated

(7.8.6) 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) Reason for this category not being relevant

Select from:

☒ Not applicable to our organization's activities

(7.8.6) Please explain

Doğan Holding's business model is not relevant for the calculation of this category in scope-3 emissions.

Use of sold products

(7.8.1) Evaluation status

Select from:

☒ Relevant, not yet calculated

(7.8.6) 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) Reason for this category not being relevant

Select from:

☒ Not applicable to our organization's activities

(7.8.6) Please explain

Doğan Holding's business model is not relevant for the calculation of this category in scope-3 emissions.

Downstream leased assets

(7.8.1) Evaluation status

Select from:

☒ Relevant, not yet calculated

(7.8.6) 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) Reason for this category not being relevant

Select from:

☒ Not applicable to our organization's activities

(7.8.6) Please explain

Doğan Holding's business model is not relevant for the calculation of this category in scope-3 emissions.

Investments

(7.8.1) Evaluation status

Select from:

☒ Relevant, not yet calculated

(7.8.6) 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) Reason for this category not being relevant

Select from:

☒ Not applicable to our organization's activities

(7.8.6) Please explain

Doğan Holding's business model is not relevant for the calculation of this category in scope-3 emissions.

Other (downstream)

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

Select from:

☒ Not applicable to our organization's activities

(7.8.6) Please explain

Doğan Holding's business model is not relevant for the calculation of this category in scope-3 emissions.

[Fixed row]

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

	Verification/assurance status
Scope 1	Select from: ☒ Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	Select from: ☒ Third-party verification or assurance process in place
Scope 3	Select from: ☒ No third-party verification or assurance

[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:

☒ Complete

(7.9.1.3) Type of verification or assurance

Select from:

☒ Limited assurance

(7.9.1.4) Attach the statement

Doğan Holding_Limited Assurance Report_2025.pdf

(7.9.1.5) Page/section reference

Page 2&3

(7.9.1.6) Relevant standard

Select all that apply

☒ ISAE3000

☒ 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:

☒ Complete

(7.9.2.4) Type of verification or assurance

Select from:

☒ Limited assurance

(7.9.2.5) Attach the statement

Doğan Holding_Limited Assurance Report_2025.pdf

(7.9.2.6) Page/ section reference

Page 2&3

(7.9.2.7) Relevant standard

Select all that apply

☒ ISAE3000

☒ ISAE 3410

(7.9.2.8) Proportion of reported emissions verified (%)

100

Row 2

(7.9.2.1) Scope 2 approach

Select from:

☒ Scope 2 market-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:

☒ Complete

(7.9.2.4) Type of verification or assurance

Select from:

☒ Limited assurance

(7.9.2.5) Attach the statement

Doğan Holding_Limited Assurance Report_2025.pdf,Doğan Holding_Limited Assurance Report_2025.pdf

(7.9.2.6) Page/ section reference

Page 2&3

(7.9.2.7) Relevant standard

Select all that apply

☒ ISAE3000

☒ ISAE 3410

(7.9.2.8) 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)

2336

(7.10.1.2) Direction of change in emissions

Select from:

☒ Increased

(7.10.1.3) Emissions value (percentage)

6.78

(7.10.1.4) Please explain calculation

Doğan Holding utilizes market-based instruments to increase renewable energy use. In 2025, 370 metric tons CO₂e is neutralized with renewable energy utilization, while this amount was 1,217 metric tons CO₂e in 2024. The change in renewable energy consumption is calculated as follows: Scope 1 and Scope 2 emissions in 2024: 34,444 tCO₂e Scope 1 and Scope 2 emissions in 2025: 36,780 tCO₂e The difference between 2024 and 2025 = 2,336 tCO₂e The percentage: $(2.336/34.444)*100 = 6.78\%$

Other emissions reduction activities

(7.10.1.1) Change in emissions (metric tons CO₂e)

16.21

(7.10.1.2) Direction of change in emissions

Select from:

☒ Decreased

(7.10.1.3) Emissions value (percentage)

0.05

(7.10.1.4) Please explain calculation

Scope 1 and Scope 2 emissions decreased by less than 0.1% due to the energy efficiency activities implemented. The change in emissions related to emissions reduction activities was 16.21 tCO₂e in 2025 (details of these emissions reduction initiatives were explained in questions 7.55.1 and 7.55.2). The percentage change due to emissions reduction activities relative to the previous year is: $16.21 / 34,444 \text{ tCO}_2\text{e} = 0.05\%$.

Divestment

(7.10.1.1) Change in emissions (metric tons CO₂e)

1163

(7.10.1.2) Direction of change in emissions

Select from:

☒ Decreased

(7.10.1.3) Emissions value (percentage)

24.6

(7.10.1.4) Please explain calculation

The divestment of Ditaş Doğan Yedek Parça İmalat ve Teknik A.Ş. was completed on 16 July 2025. The change in Scope 1 and Scope 2 emissions attributable to this divestment is 1,163.00 tCO2e, representing a 24.60% decrease compared with the previous year. This is because the 2024 emissions figure includes Ditaş for the full 12-month period, whereas the 2025 figure includes only the first half of the year up to the completion date of the divestment.

Acquisitions

(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

Doğan Holding has not made any acquisition in the reporting year.

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

Doğan Holding has not made any merger in the reporting year.

Change in output

(7.10.1.1) Change in emissions (metric tons CO₂e)

1156.79

(7.10.1.2) Direction of change in emissions

Select from:

☒ Increased

(7.10.1.3) Emissions value (percentage)

3.36

(7.10.1.4) Please explain calculation

The change in output represents the variation in greenhouse gas emissions caused by changes in the scale of production or operational activity. For Doğan Holding, the change in emissions related to output was 1,156.79 tCO₂e in 2025, corresponding to a 3.36% increase compared with the previous year. This figure reflects the net increase attributable to changes in operational output after accounting for the effects of renewable energy consumption, emissions reduction activities, and divestment.

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

Change in methodology is not relevant for Doğan Holding in the reporting year.

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

Change in boundary is not relevant for Doğan Holding in the reporting year.

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

It is not applicable for Doğan Holding.

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

It is not applicable for Doğan Holding.

[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:

☒ Market-based

(7.12) Does your organization have significant land sector activities in its operations or value chain?

(7.12.1) Agriculture, forestry or other land sector activities

Select from:

☒ No, explanation provided

(7.12.3) Specify the reason for no significant activities

Select from:

☒ Relevant activities identified but evaluated to be below the significance threshold

(7.12.4) Significance threshold

Kelkit Doğan Besi, one of the subsidiaries of Doğan Holding operating within the Industrial and Commercial sector group, is engaged in cattle farming. However, the Scope 1 and Scope 2 emissions arising from the activities of this subsidiary account for less than 0.3% of the Holding's total Scope 1 and Scope 2 emissions and are therefore below the materiality threshold.

[Fixed row]

(7.13) Does your organization choose to account for and report technological CO2 removals or captured CO2 with geologic storage, or have you done so in previous years?

	Technological CO2 removals or captured CO2 with geologic storage in the reporting year	Specify the reason for no technological CO2 removals or captured CO2 with geological storage in the reporting year	Technological CO2 removals or captured CO2 with geologic storage were accounted for and reported in previous years
	<i>Select from:</i> ☒ No, explanation provided	<i>Select from:</i> ☒ No relevant activities identified	<i>Select from:</i> ☒ No

[Fixed row]

(7.15) Does your organization break down its Scope 1 and/or Scope 2 emissions by greenhouse gas type?

(7.15.1) Emissions breakdown by greenhouse gas type

Select from:

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

(7.15.2) Primary reason for not providing an emissions breakdown by greenhouse gas type

Select from:

☒ Not an immediate strategic priority

(7.15.3) Explain why your organization does not break down its Scope 1 or 2 emissions by greenhouse gas type

Doğan Holding currently reports Scope 1 and Scope 2 emissions on a CO2e basis, but does not yet separately disclose emissions by individual greenhouse gas type. This is because a detailed breakdown by gas type is not yet an immediate strategic priority within the current reporting process. The Group is, however, considering further improvements to its emissions reporting framework over the next two years.

[Fixed row]

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

	Scope 1 emissions (metric tons CO2e)	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Türkiye	8299	28871	28481

[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)

584.77

Row 2

(7.17.1.1) Business division

Industry

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

2542.46

Row 3

(7.17.1.1) Business division

Electricity Generation

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

293.9

Row 4

(7.17.1.1) Business division

Automotive Trade and Marketing

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

491.61

Row 5

(7.17.1.1) Business division

Finance and Investment

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

426.01

Row 6

(7.17.1.1) Business division

Real Estate Investment

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

141.33

Row 7

(7.17.1.1) Business division

Internet, Entertainment and Media

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

1038.39

Row 8

(7.17.1.1) Business division

Mining

(7.17.1.2) Scope 1 emissions (metric ton CO2e)

2780.33

[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)

390.37

(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)

9553.94

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

9553.94

Row 3

(7.20.1.1) Business division

Electricity Generation

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

608.45

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

608.45

Row 4

(7.20.1.1) Business division

Automotive Trade and Marketing

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

633.45

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

633.45

Row 5

(7.20.1.1) Business division

Finance and Investment

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

172.61

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

172.61

Row 6

(7.20.1.1) Business division

Real Estate Investment

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

1278.19

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

1278.19

Row 7

(7.20.1.1) Business division

Internet, Entertainment and Media

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

646.45

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

646.45

Row 8

(7.20.1.1) Business division

Mining

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

15587.63

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

15587.63

[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)

8299

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

28871

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

28481

(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)

9

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

22

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

22

(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)

152.2

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

61.67

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

61.67

(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)

523.75

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

1908.16

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

1908.16

(7.23.1.15) Comment

Compared with the previous reporting period, the 2025 data of Profil Sanayi ve Ticaret A.Ş. were consolidated with those of Ditaş Doğan Yedek Parça İmalat ve Teknik A.Ş.

Row 3

(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)

491.61

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

633.45

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

633.45

(7.23.1.15) Comment

N/A

Row 4

(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)

293.9

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

608.45

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

608.45

(7.23.1.15) Comment

N/A

Row 5

(7.23.1.1) Subsidiary name

Doğan Gayrimenkul Yatırımları ve Ticaret A.Ş.

(7.23.1.2) Primary activity

Select from:

☒ Real estate services

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

Select all that apply

☒ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

41.51

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

20.62

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

20.62

(7.23.1.15) Comment

N/A

Row 6

(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)

157.17

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

113.69

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

113.69

(7.23.1.15) Comment

N/A

Row 7

(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)

1373.5

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

5792.13

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

5792.13

(7.23.1.15) Comment

N/A

Row 8

(7.23.1.1) Subsidiary name

Karel Elektronik Sanayi ve Ticaret A.Ş.

(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)

498.98

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

1395.29

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

1395.29

(7.23.1.15) Comment

N/A

Row 9

(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)

155.54

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

82

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

82

(7.23.1.15) Comment

N/A

Row 10

(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)

60.15

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

76.29

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

76.29

(7.23.1.15) Comment

N/A

Row 11

(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)

506.67

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

13.73

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

13.73

(7.23.1.15) Comment

N/A

Row 12

(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)

118.27

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

28.95

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

28.95

(7.23.1.15) Comment

N/A

Row 13

(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)

77.15

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

42.76

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

42.76

(7.23.1.15) Comment

N/A

Row 15

(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)

8.93

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

339.32

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

339.32

(7.23.1.15) Comment

N/A

Row 16

(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)

99.82

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

1257.57

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

1257.57

(7.23.1.15) Comment

N/A

Row 17

(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 - equity

☒ SEDOL code

☒ LEI number

(7.23.1.5) ISIN code – equity

TRADOHOL91Q8

(7.23.1.8) SEDOL code

DOHOL

(7.23.1.9) LEI number

789000J24Q4JM3H6UX22

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

584.77

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

390.37

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

0

(7.23.1.15) Comment

N/A

Row 18

(7.23.1.1) Subsidiary name

Gümüştaş Madencilik ve Ticaret Anonim Şirketi

(7.23.1.2) Primary activity

Select from:

☒ Mining & metals support 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)

2472.11

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

15265.51

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

15265.51

(7.23.1.15) Comment

N/A

Row 19

(7.23.1.1) Subsidiary name

Doku Madencilik ve Ticaret Anonim Şirketi

(7.23.1.2) Primary activity

Select from:

☒ Mining & metals support 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)

308.22

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

322.12

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

322.12

(7.23.1.15) Comment

N/A

Row 20

(7.23.1.1) Subsidiary name

(7.23.1.2) Primary activity

Select from:

☒ Media

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

Select all that apply

☒ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

374.55

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

519.12

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

519.12

(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: ☒ Yes
Consumption of purchased or acquired electricity	Select from: ☒ Yes
Consumption of purchased or acquired heat	Select from: ☒ No
Consumption of purchased or acquired steam	Select from: ☒ No
Consumption of purchased or acquired cooling	Select from: ☒ No
Generation of electricity, heat, steam, or cooling	Select from: ☒ Yes

[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

(7.30.1.3) MWh from non-renewable sources

37190.84

(7.30.1.5) Total (renewable + non-renewable) MWh

37190.84

Consumption of purchased or acquired electricity

(7.30.1.2) MWh from renewable sources

898.62

(7.30.1.3) MWh from non-renewable sources

86304.12

(7.30.1.4) MWh from non-renewable zero or near-zero emission sources

0

(7.30.1.5) Total (renewable + non-renewable) MWh

87202.74

Consumption of self-generated non-fuel renewable energy

(7.30.1.2) MWh from renewable sources

426

(7.30.1.5) Total (renewable + non-renewable) MWh

426.00

Total energy consumption

(7.30.1.2) MWh from renewable sources

1324.62

(7.30.1.3) MWh from non-renewable sources

123494.96

(7.30.1.4) MWh from non-renewable zero or near-zero emission sources

0

(7.30.1.5) Total (renewable + non-renewable) MWh

124819.58

[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: ☒ No
Consumption of fuel for the generation of heat	Select from: ☒ Yes
Consumption of fuel for the generation of steam	Select from: ☒ No

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of cooling	Select from: ☒ No
Consumption of fuel for co-generation or tri-generation	Select from: ☒ No

[Fixed row]

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

Sustainable biomass

(7.30.7.1) Total fuel MWh consumed by the organization

0

(7.30.7.7) Comment

N/A

Other biomass

(7.30.7.1) Total fuel MWh consumed by the organization

0

(7.30.7.7) Comment

N/A

Other renewable fuels (e.g. renewable hydrogen)

(7.30.7.1) Total fuel MWh consumed by the organization

0

(7.30.7.7) Comment

N/A

Coal

(7.30.7.1) Total fuel MWh consumed by the organization

0

(7.30.7.7) Comment

N/A

Oil

(7.30.7.1) Total fuel MWh consumed by the organization

25397

(7.30.7.7) Comment

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

Gas

(7.30.7.1) Total fuel MWh consumed by the organization

11794

(7.30.7.7) Comment

This figure consists of natural gas consumptions.

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

(7.30.7.1) Total fuel MWh consumed by the organization

0

(7.30.7.7) Comment

N/A

Total fuel

(7.30.7.1) Total fuel MWh consumed by the organization

37191

(7.30.7.7) Comment

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

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

Electricity

(7.30.9.1) Total Gross generation (MWh)

881397

(7.30.9.2) Generation that is consumed by the organization (MWh)

426

(7.30.9.3) Gross generation from renewable sources (MWh)

881397

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

426

Heat

(7.30.9.1) Total Gross generation (MWh)

0

(7.30.9.2) Generation that is consumed by the organization (MWh)

0

(7.30.9.3) Gross generation from renewable sources (MWh)

0

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

0

Steam

(7.30.9.1) Total Gross generation (MWh)

0

(7.30.9.2) Generation that is consumed by the organization (MWh)

0

(7.30.9.3) Gross generation from renewable sources (MWh)

0

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

0

Cooling

(7.30.9.1) Total Gross generation (MWh)

0

(7.30.9.2) Generation that is consumed by the organization (MWh)

0

(7.30.9.3) Gross generation from renewable sources (MWh)

0

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

0

[Fixed row]

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

Türkiye

(7.30.14.1) Consumption of purchased electricity (MWh)

86776.74

(7.30.14.2) Consumption of self-generated electricity (MWh)

426

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

87202.74

[Fixed row]

(7.30.15) Provide details on the electricity purchases that were accounted for at a zero or near-zero emission factor in the reporting year.

Row 1

(7.30.15.1) Country/area of electricity consumption

Select from:

☒ Türkiye

(7.30.15.2) Sourcing method

Select from:

☒ Unbundled procurement of energy attribute certificates (EACs)

(7.30.15.3) Low-carbon technology type

Select from:

☒ Wind (technology type unknown)

(7.30.15.5) Low-carbon electricity consumed via selected sourcing method in the reporting year (MWh)

899

(7.30.15.6) Energy attribute certificate (EAC) tracking system used

Select from:

☒ I-REC [International]

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

Select from:

☒ Türkiye

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

Select from:

☒ No

(7.30.15.14) Comment

N/A

[Add 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

0.397

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

37170

(7.45.3) Metric denominator

Select from:

☒ unit total revenue

(7.45.4) Metric denominator: Unit total

93680.39

(7.45.5) Scope 2 figure used

Select from:

☒ Location-based

(7.45.6) % change from previous year

6

(7.45.7) Direction of change

Select from:

☒ Decreased

(7.45.8) Reasons for change

Select all that apply

☒ Other emissions reduction activities

☒ Change in revenue

(7.45.9) Please explain

In the reporting year, gross global Scope 1 and 2 emissions increased slightly to 37,170 tCO2e, while total revenue increased to TRY 93,680.39 million. As a result, the emissions intensity decreased by approximately 6% compared with the previous year. The reduction in intensity is mainly driven by the higher revenue base relative to the increase in emissions.
[Add row]

(7.52) Provide any additional climate-related metrics relevant to your business.

Row 1

(7.52.1) Description

Select from:
☒ Waste

(7.52.2) Metric value

62.95

(7.52.3) Metric numerator

Waste recycling rate (%)

(7.52.4) Metric denominator (intensity metric only)

N/A

(7.52.5) % change from previous year

24.3

(7.52.6) Direction of change

Select from:
☒ Increased

(7.52.7) Please explain

In 2025, Doğan Holding's waste recycling rate increased to 62.95%, up 24.3% year on year.
[Add row]

(7.53) Did you have an emissions target that was active in the reporting year?

Select all that apply

- ☒ Absolute target
- ☒ Intensity 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 1

(7.53.1.2) Is this a science-based target?

Select from:

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

(7.53.1.5) Date target was set

12/31/2024

(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)

(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

12/31/2024

(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)

26628

(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)

34444.000

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

100

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

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

12/31/2030

(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)

8299

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

28481

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

36780.000

(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

-6.78

(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 is organization-wide and covers Doğan Holding's Scope 1 and Scope 2 emissions across the Group. It applies to all direct operations within the reporting boundary, with no exclusions from the target coverage.

(7.53.1.83) Target objective

The objective of this target is to achieve carbon neutrality for Scope 1 and Scope 2 emissions by 2030 through reducing direct and indirect emissions and balancing any remaining emissions.

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

Doğan Holding remains committed to reducing our Scope 1 and Scope 2 emissions to zero by 2030 by recognizing the importance of addressing our direct and indirect carbon footprint, and we have established a robust plan to achieve this goal. The Holding's 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 carbon neutrality 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]

(7.53.2) Provide details of your emissions intensity targets and progress made against those targets.

Row 1

(7.53.2.1) Target reference number

Select from:

☒ Int 1

(7.53.2.2) Is this a science-based target?

Select from:

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

(7.53.2.5) Date target was set

12/31/2025

(7.53.2.6) Target coverage

Select from:

☒ Organization-wide

(7.53.2.7) Greenhouse gases covered by target

Select all that apply

☒ Methane (CH₄)

☒ Nitrous oxide (N₂O)

☒ Carbon dioxide (CO₂)

☒ Perfluorocarbons (PFCs)

☒ Sulphur hexafluoride (SF₆)

☒ Hydrofluorocarbons (HFCs)

(7.53.2.8) Scopes

Select all that apply

☒ Scope 3

(7.53.2.10) Scope 3 categories

Select all that apply

☒ Category 6: Business travel

☒ Category 7: Employee commuting

(7.53.2.11) Intensity metric

Select from:

☒ Metric tons CO2e per unit revenue

(7.53.2.12) End date of base year

12/31/2024

(7.53.2.20) Intensity figure in base year for Scope 3, Category 6: Business travel

0.4691

(7.53.2.21) Intensity figure in base year for Scope 3, Category 7: Employee commuting

0.3637

(7.53.2.32) Intensity figure in base year for total Scope 3

0.8328000000

(7.53.2.33) Intensity figure in base year for all selected Scopes

0.8328000000

(7.53.2.41) % of total base year emissions in Scope 3, Category 6: Business travel covered by this Scope 3, Category 6: Business travel intensity figure

100

(7.53.2.42) % of total base year emissions in Scope 3, Category 7: Employee commuting covered by this Scope 3, Category 7: Employee commuting intensity figure

100

(7.53.2.53) % of total base year emissions in Scope 3 (in all Scope 3 categories) covered by this total Scope 3 intensity figure

100

(7.53.2.54) % of total base year emissions in all selected Scopes covered by this intensity figure

100

(7.53.2.55) End date of target

12/31/2040

(7.53.2.56) Targeted reduction from base year (%)

40

(7.53.2.57) Intensity figure at end date of target for all selected Scopes

0.4996800000

(7.53.2.59) % change anticipated in absolute Scope 3 emissions

-16

(7.53.2.67) Intensity figure in reporting year for Scope 3, Category 6: Business travel

0.4364

(7.53.2.68) Intensity figure in reporting year for Scope 3, Category 7: Employee commuting

0.1314

(7.53.2.79) Intensity figure in reporting year for total Scope 3

0.5678000000

(7.53.2.80) Intensity figure in reporting year for all selected Scopes

0.5678000000

(7.53.2.81) Land-related emissions covered by target

Select from:

☒ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.2.82) % of target achieved relative to base year

79.55

(7.53.2.83) Target status in reporting year

Select from:

☒ New

(7.53.2.85) Explain target coverage and identify any exclusions

This target covers Doğan Holding's Scope 3 emissions associated with Category 6 and Category 7, and applies to the Group's relevant business activities within the reporting boundary. Other Scope 3 categories are not included in this target.

(7.53.2.86) Target objective

The objective of this target is to reduce Scope 3 emissions intensity associated with Category 6 and Category 7 activities, using 2024 as the base year and 2040 as the target year.

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

The target will be pursued through ongoing efforts to improve efficiency and manage indirect emissions associated with Category 6 and Category 7 activities. In 2025, Scope 3 emissions intensity for these categories was reported at 0.57 tCO2e/mUSD. Progress will continue to be monitored annually against the 2024 base year and 2040 target year.

(7.53.2.88) Target derived using a sectoral decarbonization approach

Select from:

☒ No

[Add row]

(7.54) Did you have any other climate-related targets that were active in the reporting year?

Select all that apply

☒ Other climate-related targets

(7.54.2) Provide details of any other climate-related targets, including methane reduction targets.

Row 1

(7.54.2.1) Target reference number

Select from:

☒ Oth 1

(7.54.2.2) Date target was set

12/31/2024

(7.54.2.3) Target coverage

Select from:

☒ Organization-wide

(7.54.2.4) Target type: absolute or intensity

Select from:

☒ Absolute

(7.54.2.5) Target type: category & metric (target numerator if reporting an intensity target)

Energy productivity

☒ Other, energy productivity, please specify :Total installed power capacity (MW)

(7.54.2.7) End date of base year

12/31/2024

(7.54.2.8) Figure or percentage in base year

297

(7.54.2.9) End date of target

12/31/2030

(7.54.2.10) Figure or percentage at end of date of target

1000

(7.54.2.11) Figure or percentage in reporting year

354.2

(7.54.2.12) % of target achieved relative to base year

(7.54.2.13) Target status in reporting year

Select from:

☒ Underway**(7.54.2.15) Is this target part of an emissions target?**

No

(7.54.2.16) Is this target part of an overarching initiative?

Select all that apply

☒ No, it's not part of an overarching initiative**(7.54.2.18) Please explain target coverage and identify any exclusions**

This target is organization-wide and covers Doğan Holding's energy management activities, with a particular focus on renewable energy investments and installed power capacity across the Group. The target is driven primarily by Galata Wind's renewable generation assets and related energy transition initiatives. No specific business units are excluded from the target; however, the target is most relevant to operations directly involved in power generation and energy management.

(7.54.2.19) Target objective

The objective of this target is to increase Doğan Holding's total installed power capacity to 1,000 MW by 2030, supporting the Group's transition to a lower-carbon energy system through renewable energy investments and capacity expansion.

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

In 2025, Galata Wind's total installed capacity increased to 354.2 MW, up from 297 MW in 2024, representing a 19% year-on-year increase. This progress was driven by continued renewable energy investments and the expansion of installed generation capacity. The target will be achieved through further capacity additions, ongoing renewable energy investments, rooftop solar PV contributions, and supporting operational initiatives across the Group. Progress is monitored annually as part of Doğan Holding's sustainability target framework.

[Add row]

(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.

	Emissions reduction initiatives that were active within the reporting year
	Select from: ☒ Yes

[Fixed row]

(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	
To be implemented	0	0
Implementation commenced	0	0
Implemented	1	16.21
Not to be implemented	0	

[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

Transportation

☒ Company fleet vehicle replacement

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

16.21

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

Select all that apply

☒ Scope 1

(7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

928200

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

17400000

(7.55.2.7) Payback period

Select from:

☒ 16-20 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☒ 11-15 years

(7.55.2.9) Comment

The project involved replacing 13 fossil fuel-powered vehicles in the head office fleet with electric vehicles during 2024-2025. The initiative was implemented voluntarily as part of Galata Wind's sustainable mobility strategy and low-carbon transportation transition. It is expected to support long-term Scope 1 emissions reductions. The annual monetary saving was estimated using the following assumptions: 13 vehicles, 17,000 km of annual mileage per vehicle, an average fuel consumption of 7.5 L/100 km, and a fuel price of TRY 56 per litre. Based on the estimated annual monetary saving of TRY 928,200 and an investment requirement of TRY 17.4 million the simple payback period is approximately 18.7 years.

[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

Doğan Holding 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 power, 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 354.2 MW in 2025, consisting of wind and solar power plants. As a company that generates 100% renewable energy-based electricity, Galata Wind ensures a decrease of approximately 529,533 tonnes of GHG emissions (CO₂e) with its electricity production capacity of approximately 880,971 MWh in 2025 for its value chain.

(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 2023 emission factor (tonnes of CO₂e per MWh of electricity generated) = 0.434

(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

529533

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

GHG emissions are avoided through the generation of zero-carbon electricity by Galata Wind, which is supplied to its customers, compared with conventional electricity generation. The avoided GHG emissions are calculated based on the average emissions associated with the generation of 1 MWh of electricity in Türkiye, using the 2023 Türkiye Grid Emission Factor as the reference baseline. Accordingly, the emissions associated with the electricity generated by Galata Wind are compared with the emissions that would have occurred had the equivalent amount of electricity been generated according to the reference grid electricity mix.

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

3.14

[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 subsidiaries 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 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

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.

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 subsidiaries 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 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:

☒ 76-99

(9.2.2) Frequency of measurement

Select from:

☒ Continuously

(9.2.3) Method of measurement

Water discharge quality is measured through direct wastewater sampling and laboratory analysis. Monitored parameters include inorganic pollutants such as lead, total cyanide, iron, zinc, sulfate, mercury, cadmium, copper, and total chromium, as well as COD, BOD, TSS, and pH. Where wastewater analysis is not required for a facility, regulatory limit values are used instead of analytical results.

(9.2.4) Please explain

Our response in this row relates to our subsidiary facilities where wastewater quality is regularly monitored. The relevant monitoring has been carried out at Gümüştaş, where wastewater quality and emissions to water are assessed through direct sampling and laboratory analysis. Other subsidiaries are excluded because wastewater quality monitoring data is not currently available for those entities, or because the relevant operations are not known to be subject to the same monitoring regime. This aspect is therefore reported only for the operation for which we have confirmed monitoring data.

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 subsidiaries 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)

668.35

(9.2.2.2) Comparison with previous reporting year

Select from:

☒ Lower

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in efficiency

(9.2.2.4) Five-year forecast

Select from:

☒ About the same

(9.2.2.5) Primary reason for forecast

Select from:

☒ Investment in water-smart technology/process

(9.2.2.6) Please explain

Doğan Holding consider the change up to $\pm 5\%$ as “about the same”, 5% to 20% as higher/lower”, and above 20% as “much higher/lower” while classifying the magnitude of change from the previous year data. As the increase in withdrawal amounts compared with the 2024 data (excluding Ditaş; please see the note below) was calculated to be 4.40%, it is classified as “about the same.” Considering Gümüştaş’s water-intensive operations, the implementation of water efficiency measures as part of its integration into the Holding’s systems and processes is expected to help manage and improve water consumption. For these reasons, we anticipate that water withdrawal volumes will remain “about the same” over the next five years. (Note: The quantities of water data disclosed in this section, as well as the boundaries considered for the year-on-year comparison, have been determined excluding the data from Ditaş, a subsidiary divested by Doğan Holding in 2025.)

Total discharges

(9.2.2.1) Volume (megaliters)

57.88

(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:

☒ Increase/decrease in efficiency

(9.2.2.4) Five-year forecast

Select from:

☒ About the same

(9.2.2.5) Primary reason for forecast

Select from:

☒ Investment in water-smart technology/process

(9.2.2.6) Please explain

Doğan Holding considers changes of up to ±5% to be “about the same,” changes of 5% to 20% to be “higher/lower,” and changes of more than 20% to be “much higher/lower” when classifying the magnitude of change from the previous year’s data. As the decrease in discharge volumes compared with 2024 was calculated to be 33%, it is classified as “much lower.” For the five-year forecast, considering the planned water-efficiency initiatives and the expected optimization of operations, discharge volumes are anticipated to remain “about the same.”

Total consumption

(9.2.2.1) Volume (megaliters)

610.46

(9.2.2.2) Comparison with previous reporting year

Select from:

☒ About the same

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in efficiency

(9.2.2.4) Five-year forecast

Select from:

☒ About the same

(9.2.2.5) Primary reason for forecast

Select from:

☒ Investment in water-smart technology/process

(9.2.2.6) Please explain

Doğan Holding considers changes of up to ±5% to be “about the same,” changes of 5% to 20% to be “higher/lower,” and changes of more than 20% to be “much higher/lower” when classifying the magnitude of change from the previous year’s data. As the decrease in consumption volumes compared with 2024 was calculated to be 4.5%, it is classified as “about the same”. For the five-year forecast, considering Gümüştaş’s investments in water efficiency processes, these initiatives are

expected to support the effective management and improvement of water consumption. Therefore, we anticipate that water consumption volumes will remain “about the same.”
[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)

668.35

(9.2.4.3) Comparison with previous reporting year

Select from:

☒ Lower

(9.2.4.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in efficiency

(9.2.4.5) Five-year forecast

Select from:

☒ About the same

(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

Identification tool used

☒ 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

There were no water withdrawals from this type of source during the reporting year.

Brackish surface water/Seawater

(9.2.7.1) Relevance

Select from:

☒ Relevant

(9.2.7.2) Volume (megaliters)

12.63

(9.2.7.3) Comparison with previous reporting year

Select from:

☒ Much lower

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in efficiency

(9.2.7.5) Please explain

Data on seawater withdrawals for Doğan Holding and its subsidiaries were collected as of 2024. In 2025, total seawater withdrawals were 30% lower than in the previous year, primarily due to lower operational activity and a shift toward water sourced from third-party providers. Not all subsidiaries have seawater withdrawals, and the figures have been reported at the Group level. The reported volumes are based on Doğan Holding's direct measurements and the recorded data of its real estate subsidiary.

Groundwater – renewable

(9.2.7.1) Relevance

Select from:

☒ Not relevant

(9.2.7.5) Please explain

There were no water withdrawals from this type of source during the reporting year.

Groundwater – non-renewable

(9.2.7.1) Relevance

Select from:

☒ Relevant

(9.2.7.2) Volume (megaliters)

580.79

(9.2.7.3) Comparison with previous reporting year

Select from:

☒ About the same

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

(9.2.7.5) Please explain

Data on non-renewable groundwater withdrawals for Doğan Holding and its subsidiaries were collected as of 2024 reporting year. In 2025, total groundwater (non-renewable) withdrawals decreased by 2% compared with the previous year and are therefore classified as “about the same”. This slight decrease was due to changes in business activity across subsidiaries, as increases in some entities were balanced by decreases in others. The reported volumes are based on Doğan Holding’s direct measurements and recorded data.

Produced/Entrained water

(9.2.7.1) Relevance

Select from:

☒ Not relevant

(9.2.7.5) Please explain

There were no water withdrawals from this type of source during the reporting year.

Third party sources

(9.2.7.1) Relevance

Select from:

☒ Relevant

(9.2.7.2) Volume (megaliters)

74.93

(9.2.7.3) Comparison with previous reporting year

Select from:

☒ Much lower

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in efficiency

(9.2.7.5) Please explain

In 2025, total third-party water withdrawals decreased by 36% compared with the previous year, which is classified as “much lower”. The decrease was mainly due to efficiency initiatives implemented by certain subsidiaries to reduce grid water use. The reported volumes are based on Doğan Holding’s direct measurements and recorded data.

[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

There is no discharge to any fresh surface water sources.

Brackish surface water/seawater

(9.2.8.1) Relevance

Select from:

☒ Relevant

(9.2.8.2) Volume (megaliters)

6.32

(9.2.8.3) Comparison with previous reporting year

Select from:

☒ Much lower

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

(9.2.8.5) Please explain

Doğan Holding mainly discharges wastewater to the municipality's sewage system. In 2025, total discharge volumes decreased by 17% compared with the previous year, which is classified as "lower". This decrease was primarily driven by resource efficiency measures implemented during the year. As stated in 9.2.2, water consumption remained "about the same" in 2025, while the reduction in water withdrawal volumes resulted in a corresponding decrease in wastewater discharge volumes.

Groundwater

(9.2.8.1) Relevance

Select from:

☒ Not relevant

(9.2.8.5) Please explain

There is no discharge to any groundwater sources.

Third-party destinations

(9.2.8.1) Relevance

Select from:

☒ Relevant

(9.2.8.2) Volume (megaliters)

51.57

(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:

☒ Increase/decrease in business activity

(9.2.8.5) Please explain

Doğan Holding mainly discharge wastewater to the municipality's sewage system. 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) Indicate the highest level to which your wastewater is treated (either by your organization or a third party) before being discharged to the environment.

Quaternary treatment

(9.2.9.1) Volume (megaliters)

0

(9.2.9.6) Please explain

Quaternary treatment is not relevant to Doğan Holding and its subsidiaries' operations, as their activities do not involve processes requiring this level of wastewater treatment.

Tertiary treatment

(9.2.9.1) Volume (megaliters)

23.51

(9.2.9.2) Comparison of treated volume with previous reporting year

Select from:

☒ Much lower

(9.2.9.3) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

(9.2.9.4) % of discharge volume treated in compliance with local regulatory standards

Select from:

☒ 100

(9.2.9.5) Factors considered in determining appropriate treatment level beyond local regulatory standards

Select all that apply

☒ Sector-specific standards

☒ Profile of the receiving waterbody

☒ The water discharge impacts

(9.2.9.6) Please explain

The reported volume primarily represents wastewater generated by the Group's industrial subsidiaries. Due to the industrial characteristics of these effluents and their relatively high pollutant loads, the wastewater undergoes tertiary treatment prior to discharge. In addition, Milta Bodrum Marina treated 1.385 megalitres of water through reverse osmosis and fully reused it for vessel hull washing; therefore, this volume was not discharged and is not included in the reported discharge volume.

Secondary treatment

(9.2.9.1) Volume (megaliters)

34.37

(9.2.9.2) Comparison of treated volume with previous reporting year

Select from:

☒ Much lower

(9.2.9.3) Primary reason for comparison with previous reporting year

Select from:

- ☒ Increase/decrease in business activity

(9.2.9.4) % of discharge volume treated in compliance with local regulatory standards

Select from:

- ☒ 100

(9.2.9.5) Factors considered in determining appropriate treatment level beyond local regulatory standards

Select all that apply

- ☒ Profile of the receiving waterbody
☒ The water discharge impacts

(9.2.9.6) Please explain

The reported volume primarily represents domestic and office wastewater generated across the Group's operations. This wastewater is conveyed through municipal sewer networks and undergoes biological treatment at third-party municipal wastewater treatment facilities before being discharged to the receiving environment. Accordingly, the volume is reported under secondary treatment based on the treatment level applied by the relevant municipalities.

Primary treatment only

(9.2.9.1) Volume (megaliters)

0

(9.2.9.6) Please explain

Gümüştaş Mining, one of Doğan Holding's subsidiaries, applies physical treatment to water, after which the treated water is reused within the water management system; however, no discharge volume is reported under "Primary treatment only" for the reporting year.

No treatment

(9.2.9.1) Volume (megaliters)

0

(9.2.9.6) Please explain

Discharge to the natural environment without treatment is not relevant to Doğan Holding and its subsidiaries' operations.

Unknown

(9.2.9.1) Volume (megaliters)

0

(9.2.9.6) Please explain

Unknown treatment methods are not relevant to Doğan Holding and its subsidiaries' operations.

[Fixed row]

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

(9.2.10.1) Emissions to water in the reporting year (metric tons)

0

(9.2.10.2) Categories of substances included

Select all that apply

☒ Priority substances listed under the EU Water Framework Directive

(9.2.10.3) List the specific substances included

Lead, mercury, cadmium, copper, total chromium

(9.2.10.4) Please explain

As part of Gümüştaş's 2025 water footprint assessment, carried out in line with ISO 14046:2014, a grey water footprint result of 587,655.86 m³/year was calculated, together with additional intensity and water scarcity indicators. However, these figures are volumetric impact indicators rather than emissions to water in metric tons, and therefore cannot be directly reported under this question.

[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 substantive water-related dependencies, impacts, risks, and opportunities

(9.3.2) Total number of facilities identified

2

(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 substantive water-related dependencies, impacts, risks, and opportunities, and are not planning to do so in the next 2 years

(9.3.4) Please explain

N/A

[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 Mining - Gümüşhane (Kırkpavli)

(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

☒ Dependencies

- ☒ Impacts
- ☒ Risks
- ☒ Opportunities

(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

The facility withdraws non-renewable groundwater for operational use, but the water is fully reused within the process and therefore no discharge is reported. The site has substantive water-related dependencies due to its reliance on groundwater and operating conditions.

(9.3.1.7) Country/Area & River basin

Türkiye

- ☒ Kel Kit

(9.3.1.8) Latitude

40.46843

(9.3.1.9) Longitude

39.67441

(9.3.1.10) Located in area with water stress

Select from:

- ☒ Yes

(9.3.1.13) Total water withdrawals at this facility (megaliters)

5.97

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☒ Higher

(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

5.97

(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)

5.97

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ Higher

(9.3.1.29) Please explain

Gümüştaş Mining's Kırkpavli site in Gümüşhane represents only a minor share of the company's overall operations. Water withdrawals at this facility consist entirely of non-renewable groundwater, and the withdrawn water is reused within the process through a high level of recirculation. No discharges were reported for the reporting year. The higher withdrawal volume compared with the previous year reflects increased operational activity at this site.

Row 2

(9.3.1.1) Facility reference number

Select from:

☒ Facility 2

(9.3.1.2) Facility name (optional)

Gümüştaş Mining - Niğde Bolkar

(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

☒ Dependencies

☒ Impacts

☒ Risks

☒ Opportunities

(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

The facility withdraws non-renewable groundwater for operational use, but the water is fully reused within the process and therefore no discharge is reported. The site has substantive water-related dependencies due to its reliance on groundwater and operating conditions.

(9.3.1.7) Country/Area & River basin

Türkiye

☒ 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)

572.93

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☒ Higher

(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

572.93

(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)

572.93

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ Higher

(9.3.1.29) Please explain

Gümüştaş Mining's main operations are concentrated at the Niğde Bolkar facility. Water withdrawals at this facility consist entirely of non-renewable groundwater, and the withdrawn water is reused within the process through a high level of recirculation. No discharges were reported for the reporting year. The higher withdrawal volume compared with the previous year reflects increased operational activity at this site.

[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

Select all that apply

☒ ISAE 3000

☒ ISAE 3410

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.

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.

Water discharges – total volumes

(9.3.2.1) % verified

Select from:

☒ 76-100

(9.3.2.2) Verification standard used

Select all that apply

☒ ISAE 3000

☒ ISAE 3410

Water discharges – volume by destination

(9.3.2.1) % verified

Select from:

☒ 76-100

(9.3.2.2) Verification standard used

Select all that apply

☒ ISAE 3000

☒ ISAE 3410

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.

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.

Water consumption – total volume

(9.3.2.1) % verified

Select from:

☒ Not verified

(9.3.2.3) Please explain

This data has not been externally verified.

[Fixed row]

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

(9.5.1) Revenue (currency)

(9.5.2) Total water withdrawal efficiency

140166662.68

(9.5.3) Anticipated forward trend

Water withdrawals are expected to remain broadly stable over the coming year, with a variation of approximately $\pm 5\%$, while revenue is anticipated to increase at a faster rate. As a result, water withdrawal efficiency is expected to improve.

[Fixed row]

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

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

[Fixed row]

(9.14) Do you classify any of your current products and/or services as low water impact?**(9.14.1) Products and/or services classified as low water impact**

Select from:

☒ Yes

(9.14.2) Value chain stage where low water impact is assessed

Select all that apply

☒ Direct operations

(9.14.3) Indicator used to assess water impact

Water quality

☒ Lower water pollution than conventional processes

(9.14.4) Have you used a certification standard to classify your products/services as low water impact?

Select from:

☒ Yes, please specify standard :ISO 14046: 2014 Certification

(9.14.5) Definition used to classify low water impact

Gümüştaş monitors the potential impacts of its activities on surface water, groundwater and wastewater through regular sampling and water quality analyses at designated monitoring and discharge points, in accordance with applicable regulatory requirements. Its testing laboratories are accredited by TÜRKAK under TS EN ISO/IEC 17025:2017, supporting the reliability and technical competence of the analyses. These practices enable the company to identify, monitor and manage potential water quality impacts associated with its operations.

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

Water pollution

(9.15.1) Target set in this category

Select from:

- ☒ No, but we plan to within the next two years

(9.15.3) Primary reason for not setting a target in this category

Select from:

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

(9.15.4) Explain why you do not have a target set in this category

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

Water withdrawals

(9.15.1) Target set in this category

Select from:

- ☒ No, but we plan to within the next two years

(9.15.3) Primary reason for not setting a target in this category

Select from:

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

(9.15.4) Explain why you do not have a target set in this category

Doğan Holding recognizes the importance of addressing various water-related aspects beyond its water replenishment target. The company intends to implement additional targets concerning water pollution, water withdrawals, and Water, Sanitation, and Hygiene (WASH) services. However, Doğan Holding acknowledges the need to establish strong water management processes within the company as a prerequisite for effectively addressing these areas. Before implementing specific

targets in these areas, Doğan Holding will engage in thorough assessments and analyses to understand the current state of its water-related practices. This includes evaluating potential sources of water pollution, assessing water withdrawal patterns, and examining the provision of WASH services within its operations.

Water, Sanitation, and Hygiene (WASH) services

(9.15.1) Target set in this category

Select from:

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

(9.15.3) Primary reason for not setting a target in this category

Select from:

☒ Not an immediate strategic priority

(9.15.4) Explain why you do not have a target set in this category

Doğan Holding recognizes the importance of addressing various water-related aspects beyond its water replenishment target. The company intends to implement additional targets concerning Water, 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) Target set in this category

Select from:

☒ Yes

[Fixed row]

(9.15.1) Provide details of your water-related targets and the progress made.

Row 1

(9.15.1.1) Target reference number

Select from:

☒ Water target 1

(9.15.1.2) Target coverage

Select from:

☒ Organization-wide (direct operations only)

(9.15.1.3) Category of target & Quantitative metric

Water use efficiency

☒ Other water use efficiency, please specify :Water recovery rate (%)

(9.15.1.4) Date target was set

12/31/2024

(9.15.1.5) End date of base year

12/31/2024

(9.15.1.6) Base year figure

2.8

(9.15.1.7) End date of target year

12/31/2030

(9.15.1.8) Target year figure

100

(9.15.1.9) Reporting year figure

60

(9.15.1.10) Target status in reporting year

Select from:

☒ Underway

(9.15.1.11) % of target achieved relative to base year

59

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

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

☒ Sustainable Development Goal 6

(9.15.1.13) Explain target coverage and identify any exclusions

This target is organization-wide and covers all direct operations within Doğan Holding's reporting boundary. No specific business units or geographies are excluded from the target at present. It applies to Group's direct operations and focuses on improving water recovery efficiency across its operational sites. Gümüştaş Mining accounts for the largest share of the Group's consolidated water use; accordingly, water efficiency measures implemented at the site are expected to make an important contribution to the achievement of the Holding's overall target.

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

The target is being pursued through initiatives to strengthen water recovery performance, expand process water reuse, and improve monitoring and data-driven water management across direct operations. Approximately 60% water recovery was achieved in the reporting year. Progress is expected to continue in a steady, linear manner through enhanced water recycling systems, operational efficiency measures, and improved monitoring.

(9.15.1.18) Further details of target

The target is expressed as a percentage water recovery rate (%), using a consistent unit across the base year, reporting year, and target year. It is aligned with Sustainable Development Goal 6 and supports the Group's broader water management strategy. The target was set to reflect Doğan Holding's increasing focus on efficient water use in water-intensive direct operations, particularly following the inclusion of Gümüştaş's operations in the organizational boundary. The target is

intended to help reduce freshwater abstraction, increase process water reuse, and improve operational resilience in water-stressed locations through more data-driven and integrated water management practices.

[Add row]

C10. Environmental performance - Plastics

(10.1) Do you have plastics-related targets?

(10.1.1) Targets in place

Select from:

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

(10.1.2) Primary reason for not having a plastics-related target

Select from:

☒ Important but not an immediate business priority

(10.1.3) Explain why you did not have an active plastics-related target in the reporting year

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

(10.2.3) Please explain

Not relevant for our operations.

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

(10.2.1) Activity applies

Select from:

☒ Yes

(10.2.3) Please explain

Our group company, Sesa Packaging, produces these kinds of goods.

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

(10.2.1) Activity applies

Select from:

☒ No

(10.2.3) Please explain

Not relevant for our operations.

Production/commercialization of plastic packaging

(10.2.1) Activity applies

Select from:

☒ No

(10.2.3) Please explain

Not relevant for our operations.

Usage of plastic packaging

(10.2.1) Activity applies

Select from:

☒ No

(10.2.3) Please explain

Not relevant for our operations.

Provision of waste management

(10.2.1) Activity applies

Select from:

☒ No

(10.2.3) Please explain

Not relevant for our operations.

Other plastics-related activities not specified

(10.2.1) Activity applies

Select from:

☒ No

(10.2.3) Please explain

Plastic-related activities are specified above.
[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.

(10.4.1) Total weight during the reporting year (Metric tons)

17367.04

(10.4.2) Raw material content percentages available to report

Percentage available

- ☒ % virgin fossil-based content
- ☒ % virgin renewable content
- ☒ % pre-consumer recycled content

(10.4.3) % virgin fossil-based content

90

(10.4.4) % virgin renewable content

7

(10.4.5) % pre-consumer recycled content

3

(10.4.10) Certification of renewable and/or recycled content

Select from:

- ☒ Yes, the recycled content is certified

(10.4.11) Third-party certification scheme

Select all that apply

☒ Other, please specify :Recyclable Material Certificate

(10.4.12) Please explain

*Rates are calculated by taking into account the purchasing quantities and the dispatched order quantities based on product groups.
[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, commercialization and/or use

(10.6.1) Total weight of plastic waste generated and/or managed (Metric tons)

2827

(10.6.5) End-of-life management pathways available to report

Select all that apply

☒ Recycling

(10.6.6) Tool used to determine the percentage of end-of-life pathway

Select all that apply

☒ Other, please specify :Environmental License

(10.6.8) % recycling

100

(10.6.16) Please explain

*The rate is based on the recovery code associated with the Environmental License issued by the Ministry of Environment, Urbanization and Climate Change for the recycling company to which the waste is sent.
[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?

(11.2.1) Actions taken in the reporting period to progress your biodiversity-related commitments

Select from:

☒ Yes, we are taking actions to progress our biodiversity-related commitments

(11.2.2) Type of action taken to progress biodiversity- related commitments

Select all that apply

☒ Land/water protection

[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
	<i>Select from:</i> ☒ Yes, we use indicators	<i>Select all that apply</i> ☒ State and benefit indicators ☒ Pressure indicators ☒ Response indicators

[Fixed row]

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

Legally protected areas

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☒ No

(11.4.2) Comment

-

UNESCO World Heritage sites

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☒ No

(11.4.2) Comment

-

UNESCO Man and the Biosphere Reserves

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☒ No

(11.4.2) Comment

-

Ramsar sites

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☒ No

(11.4.2) Comment

-

Key Biodiversity Areas

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☒ Not assessed

(11.4.2) Comment

-

Other areas important for biodiversity

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☒ Yes

(11.4.2) Comment

As part of the operations of Doğan Holding subsidiary Gümüştaş Mining, flora and fauna monitoring studies were conducted at the Niğde mining site in 2025. Activities were carried out to protect endemic and threatened species, and two areas were identified as requiring protection and were fenced off accordingly.
[Fixed row]

(11.4.1) Provide details of your organization's activities in the reporting year located in or near to areas important for biodiversity.

Row 1

(11.4.1.1) Mining project ID

Select from:

☒ Project 2

(11.4.1.2) Types of area important for biodiversity

Select all that apply

- ☒ Other areas important for biodiversity

(11.4.1.4) Country/area

Select from:

- ☒ Türkiye

(11.4.1.5) Name of the area important for biodiversity

In-situ conservation area within the Tepeköy Project Site Conservation Area, located in the Niğde Bolkar Mining Site

(11.4.1.6) Proximity

Select from:

- ☒ Overlap

(11.4.1.8) Briefly describe your organization's activities in the reporting year located in or near to the selected area

In 2025, flora and fauna monitoring studies were carried out within the Tepeköy project site and its surrounding area, including the area designated for in-situ conservation. The work was conducted in Niğde Province, Ulukışla District. The surveys covered both flora and fauna, with particular attention to endemic and conservation-priority plant species as well as terrestrial vertebrate fauna, including amphibians, reptiles, birds, and mammals. Field work included direct observations, visual and auditory recordings, transect-based inspections, habitat assessments, GPS-based coordinate collection, and photographic documentation. The project area includes natural steppe, rocky slopes, agricultural lands, spoil areas, and anthropogenic habitats around the existing and planned waste storage facilities. The monitoring was part of the company's ongoing biodiversity monitoring program and was conducted in line with national guidance and relevant international biodiversity standards.

(11.4.1.9) Indicate whether any of your organization's activities located in or near to the selected area could negatively affect biodiversity

Select from:

- ☒ Yes, but mitigation measures have been implemented

(11.4.1.10) Mitigation measures implemented within the selected area

Select all that apply

- ☒ Site selection

- ☒ Project design
- ☒ Operational controls

(11.4.1.11) Explain how your organization's activities located in or near to the selected area could negatively affect biodiversity, how this was assessed, and describe any mitigation measures implemented

The project area contains endemic and conservation-priority plant species and habitats of ecological importance. Potential impacts from mining-related activities were assessed through flora and fauna monitoring, habitat inspections, and GPS-referenced field surveys. An in-situ conservation area was designated within the project site, and signage was installed to prevent disturbance. The area was treated as a no-intervention zone to avoid direct impacts on sensitive species and habitats.

(11.4.1.12) Further context for mining projects

The Tepeköy project site in Niğde Province includes areas where endemic and threatened plant species were identified, including species listed as EN, CR and NT. The site has been subject to repeated flora and fauna surveys in 2025. The conservation area within the project site was identified based on field studies and existing environmental and social database work, and was designated for in-situ protection. The area is within the mine project footprint, and coordinates were used to document species locations and conservation boundaries.

[Add 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 conducts its activities under licenses and permits issued by the relevant public authorities and manages land use in accordance with applicable legislation, Environmental Impact Assessment (EIA) commitments, and environmental management practices. The company does not currently disclose full project-level data on total mining project areas and land directly disturbed by mining activities because project-level consolidated and comparable data distinguishing licensed/project areas from areas actually disturbed or affected by operations are still being systematically developed. Licensed areas include both active mining and ore beneficiation areas and surrounding land within license boundaries that is not directly affected by mining activities. As a result, the total licensed/project area cannot be considered equivalent to the area disturbed by mining. Land-related impacts are monitored in accordance with EIA commitments, environmental monitoring programs, and rehabilitation obligations, covering production areas, beneficiation facilities, waste storage areas,

transportation and supporting infrastructure, as well as rehabilitation areas. A Biodiversity Action Plan has been prepared for Gümüştaş Mining's project site, under which measures for the protection of species have been defined. The company also carries out rehabilitation, land reuse, and revegetation/reforestation activities where appropriate. For example, the ADT-1 area at the Gümüşhane operation was rehabilitated following the end of its operational life, and work has been initiated to repurpose the area for solar energy generation without additional land use. Gümüştaş is enhancing its processes to systematically monitor and report, on a project-specific basis, total licensed/project area, directly disturbed/affected area, rehabilitated area, and area planned for rehabilitation. This work is also supported by its participation in Sustainable Mining Initiative/TSM activities in 2026. As these project-level datasets are further developed, the company aims to provide more detailed, consistent, and comparable disclosure of land-use and land-disturbance indicators in future reporting periods.

[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:

☒ Yes

(11.7.1) Describe your criteria for defining which sites are required to produce biodiversity action plans.

Rehabilitation activities are an important part of Gümüştaş's environmental management approach. As part of these activities, efforts are undertaken to rehabilitate areas that have reached the end of their operational life or have been affected by mining activities. At the Gümüşhane operation, closure and rehabilitation activities have been carried out for the ADT-1 area, which had reached the end of its operational life, including measures to ensure that the area was made physically and environmentally safe and stable. In the Niğde operations, flora and fauna monitoring activities and practices aimed at protecting endemic plant species are carried out in accordance with EIA commitments. A Biodiversity Action Plan has also been prepared for the Gümüştaş Mining project site, under which measures and practices for the protection of species have been defined. Currently, consolidated project-level data on the total area rehabilitated and the area rehabilitated during the reporting year, expressed in hectares, are not publicly disclosed. In line with the Sustainable Mining Initiative/TSM approach, Gümüştaş is further developing its efforts to systematically monitor rehabilitation performance and to regularly disclose, on a project-specific basis, indicators including the total area rehabilitated, the area rehabilitated during the reporting period, and the area planned for rehabilitation.

(11.8) Provide details on mining projects that are required to produce Biodiversity Action Plans.

(11.8.1) Number of mining projects required to produce a BAP

1

(11.8.2) % of mining projects required to produce a BAP that have one in place

50

(11.8.3) Format

Select all that apply

- ☒ Stand-alone document
- ☒ Part of general Environmental Management System

(11.8.4) Frequency BAPs are reviewed

Select all that apply

- ☒ Regularly

(11.8.5) Please explain

Gümüştaş currently operates two mining projects, located in Niğde and Gümüşhane. A Biodiversity Action Plan (BAP) has been prepared and is under implementation for the Niğde Bolkar mining project, resulting in 50% of the company's mining projects being covered by a BAP. The BAP defines measures and practices aimed at protecting biodiversity and species identified in the project area and supports the management of biodiversity-related impacts and risks associated with mining activities. In addition, flora and fauna monitoring activities are conducted at the Niğde operation, including practices aimed at protecting endemic plant species in accordance with EIA commitments. These activities support the identification and monitoring of biodiversity-related risks and the implementation of appropriate protection measures. At the Gümüşhane operation, biodiversity and environmental impacts are managed through EIA commitments, environmental monitoring and rehabilitation practices. Rehabilitation activities form an important part of Gümüştaş's environmental management approach. For example, closure and rehabilitation activities have been carried out for the ADT-1 area following the end of its operational life, including measures to ensure that the area was made physically and environmentally safe and stable. The BAP is reviewed regularly to ensure that biodiversity-related measures remain appropriate in light of monitoring results, changes in project activities and site conditions, and identified biodiversity-related risks and impacts. The review process also provides an opportunity to assess the effectiveness of existing measures and identify any additional actions required. Gümüştaş continues to develop its biodiversity and environmental monitoring practices and, in line with the Sustainable Mining Initiative/TSM approach, is further strengthening its systematic monitoring and reporting processes at the project level.

[Fixed row]

(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, Gümüştaş, conducts Environmental Impact Assessments (EIA) prior to project development in line with national legislation, which identify potential biodiversity-related risks and define appropriate mitigation measures. Based on the biodiversity assessment conducted in 2025, potential impacts on habitats and species were assessed and measures were identified to manage and mitigate these potential impacts. These measures include habitat management, species monitoring, leakage control, and rehabilitation activities. In addition, flora and fauna monitoring activities and practices aimed at protecting endemic and threatened species are carried out at the Niğde operation. To date, no significant adverse impacts on biodiversity directly attributable to Gümüştaş's operations have been identified. However, the company recognizes that mining activities may have the potential to affect biodiversity, particularly in ecologically sensitive areas. Therefore, potential biodiversity-related impacts are continuously monitored and managed through environmental monitoring programs, mitigation measures, rehabilitation practices, and compliance with EIA commitments and other applicable requirements. Gümüştaş continues to strengthen its biodiversity management practices, including through the development and implementation of project-specific biodiversity measures and its participation in Sustainable Mining Initiative/TSM activities.

[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:

☒ Yes

(11.12.1) Provide relevant company-specific examples of your implementation of avoidance and minimization actions to manage adverse impacts on biodiversity.

Row 1

(11.12.1.1) Mining project ID

Select from:

☒ Project 2

(11.12.1.2) Approach and type of measure

Minimization

☒ Operational controls

(11.12.1.3) Description

At the Niğde Bolkar mining project, Gümüştaş has implemented biodiversity management measures to minimize potential adverse impacts on habitats and species. As part of the biodiversity-related work conducted in 2025, potential impacts on habitats and species were assessed and measures were defined, including habitat management, flora and fauna monitoring, and practices aimed at protecting endemic and threatened species. These measures support the early identification and monitoring of biodiversity-related risks and enable appropriate protection measures to be implemented where potential impacts are identified. In addition, leakage control and rehabilitation measures are applied to reduce potential impacts associated with mining activities. Rehabilitation activities are undertaken for areas affected

by mining activities that have reached the end of their operational life, with the aim of restoring environmental conditions and reducing longer-term impacts. These measures are implemented alongside EIA commitments and environmental monitoring practices and contribute to minimizing potential impacts of the mining project on biodiversity and ecosystem services.

[Add row]

(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:

☒ Yes

(11.16.2) Comment

Currently, we do not have comprehensive, project-level mine closure plans in place for the complete cessation of mining activities. However, closure and rehabilitation activities are being carried out for individual areas that have reached the end of their operational life. For example, at the Gümüşhane operation, the ADT-1 area, which had reached the end of its operational life, was subject to closure and rehabilitation activities, with measures implemented to ensure that the area was made physically and environmentally safe and stable. Gümüştaş aims to develop its mine closure approach over the long term as a holistic process that encompasses not

only the cessation of mining activities, but also land rehabilitation, biodiversity conservation, environmental monitoring, management of social impacts, and post-closure land-use planning. It is planned to further systematize this approach in the future in line with the Sustainable Mining Initiative/TSM activities.
[Fixed row]

(11.16.1) Please provide details on mines with closure plans.

(11.16.1.1) % of mines with closure plans

50

(11.16.1.2) % of closure plans that take biodiversity aspects into consideration

100

(11.16.1.3) Is there a financial provision for mine closure expenditure?

Select from:

☒ No

(11.16.1.4) Frequency closure plans are reviewed

Select all that apply

☒ Regularly (some projects)

(11.16.1.5) Please explain

The closure project for the ADT-1 waste storage area in Gümüşhane was in place as of 2025 and was approved by the Ministry on 29 July 2025. The closure project defines post-closure maintenance and monitoring activities, as well as measures for site rehabilitation. It envisages the establishment of a cover system, the application of a topsoil layer, and preparation of the area for greening. In addition, the construction of a solar power plant is planned after closure. In this context, it is considered that rehabilitation and the restoration of the natural area have been taken into account in the closure approach.

[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. Rehabilitation activities are an important part of Gümüştaş's environmental management approach. As part of these activities, efforts are undertaken to rehabilitate areas that have reached the end of their operational life or have been affected by mining activities. At the Gümüşhane operation, closure and rehabilitation activities have been carried out for the ADT-1 area, which had reached the end of its operational life, including measures to ensure that the area was made physically and environmentally safe and stable. In the Niğde operations, flora and fauna monitoring activities and practices aimed at protecting endemic plant species are carried out in accordance with EIA commitments. Currently, consolidated project-level data on the total area rehabilitated and the area rehabilitated during the reporting year, expressed in hectares, are not publicly disclosed. In line with the Sustainable Mining Initiative/TSM approach, Gümüştaş is further developing its efforts to systematically monitor rehabilitation performance and to regularly disclose, on a project-specific basis, indicators including the total area rehabilitated, the area rehabilitated during the reporting period, and the area planned for rehabilitation.

[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: ☒ No	N/A

[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 to facilitate collective action in priority basins.

Select from:

☒ No

