

W0. Introduction

W0.1

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

Hacı Ömer Sabancı Holding A.Ş., one of Turkey's leading conglomerates, is the parent company of Sabancı Group and manages the Group's companies with a strategic approach. Sabancı Group's main business areas are banking, financial services, energy, industrials, building materials and retail. Having a value-focused, data driven ecosystem, Sabancı Group companies were operating in 13 countries as of 2021 year-end and were supplying their products to regions throughout Europe, the Middle East, Asia, North Africa and North and South America.

In 2021, Sabancı Group posted combined net sales of TL 152 billion and consolidated net income of TL 12 billion. Sabancı Holding's own shares as well as the shares of its listed 11 subsidiaries constitute 6% of the total market capitalization of the Turkish equity market as of the end of 2021. The Sabancı Family is collectively Sabancı Holding's majority shareholder. As of year-end 2021, 49.11% of Sabancı Holding's shares are publicly traded.

Sabancı Holding's executive activities are carried out by the Executive Committee, consisting of the CEO, CFO, Strategic Business Unit Presidents and the Group President of Human Resources and Sustainability. The Executive Committee reports to the Board of Directors. The Sustainability Committee was formed in 2021 to assist the Board of Directors in comprehensively fulfilling their duties and responsibilities regarding environmental and social issues.

Sabancı Holding considers sustainability as an integral part of its mission and strategy. In 2021, Sabancı Holding increased its efforts to integrate its rapid and exemplary transformation based on technology and sustainability across the organization. As an indicator of its vision on this journey, Sabancı changed its purpose to "We unite Turkey and the World for a sustainable life with leading enterprises." In addition to this, Sabancı Holding launched a 5-year strategy plan in which there are 5 strategic directions that will lead the Group to its purpose: Provide wider customer experience, Transform into an agile/global footprint, Pioneer in sustainability, Lead in digital & material technologies, Adapt to Future of Work. The Group steadily supports and strengthens these 5 strategic directions with its investments in technology and digital.

In 2020, Sustainability Roadmap was created and the potential areas to increase the Group's positive impact were determined. The Sustainability Roadmap, which was approved by the Executive Board and the Board of Directors in 2021, includes Group-wide actions on climate emergency, alongside with other material issues. Moving forward with the goal of achieving Net-Zero Emissions and Zero Waste in all operations by 2050, Sabancı Group started to take approximately 80 detailed actions developed to implement the Sustainability Roadmap in 2021. By the end of December, more than %50 of the actions were undertaken. The Holding also began measuring the key performance indicators for each pillar of Sustainability Roadmap in 2021 and received independent assurance services for these data for the entire Group.

At Sabancı Group, we see water as a fundamental natural capital for all sectors in which we operate. We are aware that disruption in water supply will adversely affect all business processes. Accordingly, we define our impact on water resources on an industry basis, and carry out studies focused on efficiency, recovery and savings to manage water in a sustainable manner.

Across the Group, the percentage of water recycled and reused in 2021 was at 23%. In the future, we will continue to give priority to increasing water efficiency through projects, especially in water and emission-intensive sectors.

Detailed information on Sabancı Holding's water management approach is published on 2021 Sabancı Holding Sustainability Report, which can be accessed on Sabancı Holding's Investor Relations Website.

W0.2

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

	Start date	End date
Reporting year	January 1 2021	December 31 2021

W0.3

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

Turkey

W0.4

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

TRY

W0.5

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

Other, please specify (All figures represent %100 of Hacı Ömer Sabancı Holding A.Ş.'s direct operations.)

W0.6

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

No

W0.7

(W0.7) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?

Indicate whether you are able to provide a unique identifier for your organization.	Provide your unique identifier
Yes, an ISIN code	TRASAHOL91Q5

W1. Current state

W1.1

(W1.1) Rate the importance (current and future) of water quality and water quantity to the success of your business.

	Direct use importance rating	Indirect use importance rating	Please explain
Sufficient amounts of good quality freshwater available for use	Important	Vital	CURRENT Direct: The direct use of water in Sabancı Headquarters offices and cafeteria services, which represents 100% of the boundaries determined for this Report, covers operational and maintenance activities for cooling, heating and cleaning/ hygiene purposes. We also need good-quality fresh water for our employees (WASH needs). Indirect: As a Holding company, which invests in a range of diverse sectors including water intense & manufacturing sectors (energy generation incl. hydropower, building materials, etc.), the availability and quality of water for indirect use of our value chain is vital in terms of continuity of the operations and operational costs of our value chain. Depending on the sector, actions such as increasing water efficiency, investing in non-water dependent energy production technologies such as wind and solar, reusing & recycling water, measuring and better managing water consumption through the use of digitalization and technology, rain water harvesting, detecting and repairing losses and leaks in the lines are carried out. Although the intense efforts of our value chain (mainly investments) to reduce their dependency on water resources through such programs, certain parts of our investments - such as hydropower generation - will still rely on availability of water. FUTURE Direct: In 5 years time, as we make our operations more water-efficient, our dependency on water will decrease. On the other hand, taking into account a potential increase in the scarcity of water supply from Marmara Basin in the mid-term, the rating for direct use of water - may be evaluated as "vital" in the future. Indirect: Given the fact that climate emergency will deepen the water-related impacts on such activities, the indirect use of water rating will stay as vital in 5 years time.
Sufficient amounts of recycled, brackish and/or produced water available for use	Neutral	Vital	CURRENT Direct: Since Sabancı Holding does not have any manufacturing activities, the availability of recycled, brackish and/or produced water does not have a significant impact (both from a financial and business continuity perspective) on the Holding's own activities. Indirect: As a Holding company, which invests in a range of diverse sectors including water intense & manufacturing sectors (e.g. building materials), sufficient amounts of recycled, brackish and/or produced water available for use is vital for us in terms of continuity of the operations and operational costs of our value chain. Since water-intense manufacturing technologies may face a number of risks including those that are reputational, physical or those related to changing consumer behavior, our value chain is constantly investing in recycling/reuse processes. As a result of such efforts the rate of water that Sabancı Group companies saved through programs such as recycling and reuse was 23% in 2021. FUTURE Direct: We believe the importance rating will increase to "important" in 5 years time, since the HQs may need to rely on recycled, brackish and/or produced water instead of tap water due to a potential scarcity in water supply from Marmara Basin in the mid-term. Indirect: In 5 years time, the importance of this topic for indirect operations will remain as vital, since the climate emergency will put more pressure on availability of water and the manufacturing facilities will need to intensify their efforts to recycle/reuse water or explore other methods of water production instead of relying on natural water resources.

W1.2

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

	% of sites/facilities/operations	Please explain
Water withdrawals – total volumes	100%	As Sabancı Holding, nearly 100% of our water withdrawal is supplied by a third party, i.e. municipal water supplier/ISKI (Istanbul Municipality Waterworks). The method for water withdrawal measuring is the use of flowmeters and the measurement is cross checked by bills on a monthly basis. The frequency of measurement is monthly and yearly.
Water withdrawals – volumes by source	100%	As Sabancı Holding, nearly 100% of our water withdrawal is supplied by a single source, i.e. municipal water supplier/ISKI (Istanbul Municipality Waterworks). Water and Sewerage Administration entities across Turkey including ISKI discloses information regarding the water withdrawal from each dam and reports annually the dam occupancy rates and monthly on water quality. The method for water withdrawal measuring by source is the use of flowmeters and the measurement is cross checked by bills on a monthly basis. The frequency of measurement is monthly.
Entrained water associated with your metals & mining sector activities - total volumes [only metals and mining sector]	<Not Applicable>	<Not Applicable>
Produced water associated with your oil & gas sector activities - total volumes [only oil and gas sector]	<Not Applicable>	<Not Applicable>
Water withdrawals quality	100%	As Sabancı Holding, 100% of our water withdrawal is supplied by a third party, i.e. municipal water supplier/ISKI (Istanbul Municipality Waterworks). Water and Sewerage Administration entities across Turkey including ISKI discloses information regarding the water quality on a monthly basis through lab analysis conducted by ISKI Clean Water Laboratory Office.
Water discharges – total volumes	100%	Wastewater , which is generated from office and cafeteria services including operational and maintenance activities for cooling, heating, cleaning, hygiene purposes and irrigation of the garden, is discharged into the municipal sewage system . 100% of discharged total volumes is monitored by continuous flow meters on a monthly and annual basis, it is cross-checked by the bills.
Water discharges – volumes by destination	100%	100% of water withdrawn is discharged to a single destination - municipal sewage system and is monitored on a monthly and annual basis. 100% of the water discharge is monitored by flowmeters.
Water discharges – volumes by treatment method	100%	100% of wastewater discharged to municipal sewage system is treated by ISKI, which operates 88 treatment facilities with technologies such as biological and advanced biological treatment. The treatment method and the number of treatment facilities are disclosed on a yearly basis by ISKI, in their official website. The water discharged to sewage system by Sabancı Holding meets the basic requirements of the regulatory discharge quality for the sewage system.
Water discharge quality – by standard effluent parameters	Not relevant	Wastewater , which is generated from office and cafeteria services including operational and maintenance activities for cooling, heating, cleaning, hygiene purposes and irrigation of the garden, is discharged into the municipal sewage system. By meeting all legal criteria regarding discharge into sewage system, 100% of discharged total volumes is monitored by continuous flow meters on a monthly and annual basis
Water discharge quality – temperature	100%	Since Sabancı Holding does not have any manufacturing activities and only discharges to sewage system, water discharge temperature and thermal pollution is not relevant for the Holding itself. We do not expect this aspect to be relevant in the future either, taking into consideration the nature of our operations as the Holding, i.e. the source of water withdrawal.
Water consumption – total volume	100%	Here the term "water consumption" calculated as the difference of "water withdrawal" and "water discharges". The water consumption, which is the difference between our withdrawal and discharge is zero. We frequently make the maintenance of our Sabancı Towers, therefore no incidence for leakage is reported in 2021. Additionally, there is no process to cause evaporation.
Water recycled/reused	100%	We utilize both from the rain water and from the bluff water (clean drain water by obtaining cooling towers in cooling systems) for irrigation purposes and intend to increase the use of recycled/recovered/reused water. The monitoring is made one a year taking into consideration the volume of the water tank.
The provision of fully-functioning, safely managed WASH services to all workers	100%	Our employees in Sabancı Headquarters are white collar workers and working in one, daytime shift. Although there is no such need for white collar workers, we have a sport center with showers (WASH services) in the building. It is open to use for our employees. Cafeteria and cleaning activities are fulfilled by our suppliers. For the sake of fully-functioning WASH services, a 1,500 m3 of fresh water storage reservoir is available for daily use in case of having any trouble in the municipal water system.

W1.2b

(W1.2b) What are the total volumes of water withdrawn, discharged, and consumed across all your operations, and how do these volumes compare to the previous reporting year?

	Volume (megaliters/year)	Comparison with previous reporting year	Please explain
Total withdrawals	8.38	Much lower	As a result of the improvement works carried out, our total withdrawals have been reduced by 23% compared to 2020. On the other hand, we continued our efforts to increase water efficiency and awareness raising activities. In 2022 and 2023, we do not expect a significant increase in total withdrawals.
Total discharges	7.38	Much lower	As a result of the improvement works carried out, our total discharges have been reduced by 32% compared to 2020. Another reason for this decrease is the lower amount of rainwater due to considerably less rain encountered. On the other hand, we continued our efforts to increase water efficiency and awareness raising activities. In 2022 and 2023, we do not expect a significant increase in total discharges.
Total consumption	1	Higher	The difference between our withdrawal and discharge which means water consumption is 1 megaliters. , since most of water withdrawal is discharged to sewage system and there are no losses such as leakage or a process to cause evaporation. In 2022 and 2023, we estimate that our water consumption will be about the same as 2021.

W1.2d

(W1.2d) Indicate whether water is withdrawn from areas with water stress and provide the proportion.

	Withdrawals are from areas with water stress	% withdrawn from areas with water stress	Comparison with previous reporting year	Identification tool	Please explain
Row 1	Yes	100%	About the same	WRI Aqueduct	Our water is withdrawn from Marmara basin, where currently there is high water stress. On the other hand, since our total volume of water withdrawn is 8,38 megaliters, we don't have direct significant water withdrawal effect on water resources. We use the WRI Aqueduct Water Risk Atlas tool to identify overall water risks, baseline water stress, the projected change in water stress, flood occurrence, drought severity, groundwater stress in locations where our facilities/sites/ operations at. By using the tool, we assessed the Water Stress level for Marmara Basin. We only searched for Marmara basin as our operations are based in Istanbul.

W1.2h

(W1.2h) Provide total water withdrawal data by source.

	Relevance	Volume (megaliters/year)	Comparison with previous reporting year	Please explain
Fresh surface water, including rainwater, water from wetlands, rivers, and lakes	Not relevant	<Not Applicable>	<Not Applicable>	As per the third party assurance we received for water, no amounts of withdrawal from fresh surface water were verified. We assume the total amount as zero for this category, and consequently it is not relevant.
Brackish surface water/Seawater	Not relevant	<Not Applicable>	<Not Applicable>	We do not source water from Brackish surface water/Seawater, therefore our withdrawal from this source is 0.
Groundwater – renewable	Relevant	2.5	Higher	Our withdrawal from groundwater is 2,5 megaliters.
Groundwater – non-renewable	Not relevant	<Not Applicable>	<Not Applicable>	We do not source water from groundwater-non-renewable, therefore our withdrawal from groundwater-non-renewable is zero. We supply water from a third party, i.e. municipal water supplier/ISKI (Istanbul Municipality Waterworks). Consequently, it is not relevant.
Produced/Entrained water	Not relevant	<Not Applicable>	<Not Applicable>	We do not use produced/process water, therefore use of produced/process water is zero. We supply water from a third party, i.e. municipal water supplier/ISKI (Istanbul Municipality Waterworks). Consequently, it is not relevant.
Third party sources	Relevant	7.38	Much lower	We supply water from a third party, i.e. municipal water supplier/ISKI (Istanbul Municipality Waterworks). As a result of the improvement works carried out, our total discharges have been reduced by 32% compared to 2020. On the other hand, we continued our efforts to increase water efficiency and awareness raising activities. In 2022 and 2023, we do not expect a significant increase in total discharges.

W1.2i

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

	Relevance	Volume (megaliters/year)	Comparison with previous reporting year	Please explain
Fresh surface water	Not relevant	<Not Applicable>	<Not Applicable>	We don't discharge water to any destinations other than municipal sewage system.
Brackish surface water/seawater	Not relevant	<Not Applicable>	<Not Applicable>	We don't discharge water to any destinations other than municipal sewage system.
Groundwater	Not relevant	<Not Applicable>	<Not Applicable>	We don't discharge water to any destinations other than municipal sewage system.
Third-party destinations	Relevant	7.38	Much lower	We discharge water to municipal sewage system. As a result of the improvement works carried out, our total discharges have been reduced by 32% compared to 2020. On the other hand, we continued our efforts to increase water efficiency and awareness raising activities. In 2022 and 2023, we do not expect a significant increase in total discharges.

W1.2j

(W1.2j) Within your direct operations, indicate the highest level(s) to which you treat your discharge.

	Relevance of treatment level to discharge	Volume (megaliters/year)	Comparison of treated volume with previous reporting year	% of your sites/facilities/operations this volume applies to	Please explain
Tertiary treatment	Not relevant	<Not Applicable>	<Not Applicable>	<Not Applicable>	Tertiary treatment is the "treatment" process used to remove polluting agents, like nitrogen, phosphorus, heavy metals, toxic organic substances, etc., which can not be sufficiently removed via physical or biological treatment methods. There are no manufacturing activities nor large-scale processes within the boundaries determined in this Report (i.e. Sabancı Holding HQs). Also, the quality of wastewater discharged to the municipal sewage system is under the limits defined for municipal wastewater discharge. Consequently, there is no need for a wastewater treatment plant. Since our operations will remain the same in the coming years and no change is expected in discharged water quality; we do not plan to apply tertiary treatment moving forward.
Secondary treatment	Not relevant	<Not Applicable>	<Not Applicable>	<Not Applicable>	There are no manufacturing activities nor large-scale processes within the boundaries determined in this Report (i.e. Sabancı Holding HQs). Also, the quality of wastewater discharged to the municipal sewage system is under the limits defined for municipal wastewater discharge. Consequently, there is no need for a wastewater treatment plant. Since our operations will remain the same in the coming years and no change is expected in discharged water quality; we do not plan to apply secondary treatment moving forward.
Primary treatment only	Not relevant	<Not Applicable>	<Not Applicable>	<Not Applicable>	There are no manufacturing activities nor large-scale processes within the boundaries determined in this Report (i.e. Sabancı Holding HQs). Also, the quality of wastewater discharged to the municipal sewage system is under the limits defined for municipal wastewater discharge. Consequently, there is no need for a wastewater treatment plant. Since our operations will remain the same in the coming years and no change is expected in discharged water quality; we do not plan to apply primary treatment moving forward.
Discharge to the natural environment without treatment	Not relevant	<Not Applicable>	<Not Applicable>	<Not Applicable>	There are no manufacturing activities nor large-scale processes within the boundaries determined in this Report (i.e. Sabancı Holding HQs). 100% of the wastewater is discharged to the municipal sewage system. Consequently, there is no discharge to the natural environment without treatment. Since our operations will remain the same in the coming years and no change is expected; there will not be any discharge to the natural environment with or without treatment moving forward.
Discharge to a third party without treatment	Relevant	7.38	Much lower	100%	There are no manufacturing activities nor large-scale processes within the boundaries determined in this Report (i.e. Sabancı Holding HQs). 100% of the wastewater is discharged to municipal sewage system which is then treated in municipal wastewater treatment facilities. Also, the quality of wastewater discharged to the municipal sewage system is under the limits defined for municipal wastewater discharge. Consequently, there is no need for wastewater treatment prior to discharge. Since our operations will remain the same in the coming years and no change is expected; there will not be any need for pre-treatment before discharge to sewage system moving forward.
Other	Not relevant	<Not Applicable>	<Not Applicable>	<Not Applicable>	There are no manufacturing activities nor large-scale processes within the boundaries determined in this Report (i.e. Sabancı Holding HQs). Also, the quality of wastewater discharged to the municipal sewage system is under the limits defined for municipal wastewater discharge. Consequently, there is no need for a wastewater treatment plant. Since our operations will remain the same in the coming years and no change is expected in discharged water quality; we do not plan to apply pre-treatment before discharge moving forward.

W1.3

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

	Revenue	Total water withdrawal volume (megaliters)	Total water withdrawal efficiency	Anticipated forward trend
Row 1	1521125 02712	838	181518499.656 325	In the future we expect the efficiency and the water intensity value to be higher as a result of the water efficiency programs we are working on. We are also expecting an increase in revenues in the future in line with our business plans, so revenue/withdrawal efficiency is expected to be higher in the coming years.

W1.4

(W1.4) Do you engage with your value chain on water-related issues?

Yes, our suppliers

Yes, our customers or other value chain partners

W1.4a

(W1.4a) What proportion of suppliers do you request to report on their water use, risks and/or management information and what proportion of your procurement spend does this represent?

Row 1

% of suppliers by number

None currently, but we plan to request this within the next two years

% of total procurement spend

<Not Applicable>

Rationale for this coverage

As Sabancı Holding, we are planning to request in 2 years as we have just put our Responsible Investment Policy into effect. Companies which have more than 500 employees and which provide goods and services to Sabancı Holding at an amount of 5% or more of the annual total supply of goods and services per company are prioritized if they have a commitment on reporting to CDP Water and Climate Change Program in the first reporting period following the date of renewal of contract and/or which publicly declare a commitment to reach net zero emissions and/or zero waste in 2050 at the latest. Having said that, our investee companies (i.e. Group companies) implement a wide range of supplier engagement on natural resource consumption incl. water given the nature of their business, i.e. manufacturing.

Impact of the engagement and measures of success

<Not Applicable>

Comment

W1.4b

(W1.4b) Provide details of any other water-related supplier engagement activity.

Type of engagement

Onboarding & compliance

Details of engagement

Requirement to adhere to our code of conduct regarding water stewardship and management

% of suppliers by number

Less than 1%

% of total procurement spend

Less than 1%

Rationale for the coverage of your engagement

As we are a Holding company, we don't have suppliers which have significant water impact. We manage water security throughout our investee companies, i.e. Group companies. Accordingly, the response represents our Group company efforts to engage with suppliers on water issues. For instance, our Group company Brisa, revised its Responsible Procurement Policy in line with Bridgestone Global Sustainable Procurement Policy. As part of Brisa's Policy they request all suppliers including local service providers, which are not bound by Bridgestone Policy, to confirm their procurement rules, including responsible use of natural resources such as water, and sustainable management of operations.

Impact of the engagement and measures of success

As we are a Holding company, we don't have suppliers which have significant water impact. We manage water security throughout our investee companies, i.e. Group companies. Accordingly, the response represents our Group company efforts to engage with suppliers on water issues. For instance, our Group company Brisa's measure of success is to engage with 100% of our supply chain and have their commitment to Brisa's procurement policies (excerpt from 2020 Brisa CDP Water Security response).

Comment

W1.4c

(W1.4c) What is your organization's rationale and strategy for prioritizing engagements with customers or other partners in its value chain?

As a Holding company, the most material part of our value chain in terms of environmental impact is our investments, i.e. the companies that we invest in our portfolio (the Group). Therefore, we pioneer and lead the sectors that we operate in via (1) our 5-year Strategic Plan, where "pioneering in sustainability" is among the five strategic directions and is part of our "Purpose" as the Group, (2) our Sustainability Roadmap, which is implemented by the entire Group, (3) performance management in which sustainability is embedded at a rate of 10%-15% in senior management performance goals, (4) our asset allocation strategy in which sustainability is among the key drivers.

In practice, our Sustainability Roadmap is implemented through the Thematic Task Forces, consisting of experts from the Group companies as well as the Sustainability Directorate which resides at Sabancı Holding. The Task Forces operate with an agile working model and ultimately report their work to the Sustainability Leadership Committee consisting of the Holding's Group Presidents.

The success of engagement is measured through Group-wide KPIs such as water intensity or the total percentage of water recycled and reused. Additionally, sustainability related KPIs are embedded in the performance assessment of the senior management in Group companies as explained above.

Detailed information on Sabancı Holding's water management approach is published on 2021 Sabancı Holding Sustainability Report, which can be accessed on Sabancı Holding's Investor Relations Website.

W2. Business impacts

W2.1

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

No

W2.2

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

No

W3. Procedures

W3.3

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

Yes, water-related risks are assessed

W3.3a

(W3.3a) Select the options that best describe your procedures for identifying and assessing water-related risks.

Value chain stage

Direct operations

Coverage

Full

Risk assessment procedure

Water risks are assessed as part of other company-wide risk assessment system

Frequency of assessment

More than once a year

How far into the future are risks considered?

3 to 6 years

Type of tools and methods used

Enterprise risk management

Other

Tools and methods used

COSO Enterprise Risk Management Framework

ISO 31000 Risk Management Standard

Internal company methods

External consultants

Materiality assessment

Contextual issues considered

Water regulatory frameworks

Access to fully-functioning, safely managed WASH services for all employees

Stakeholders considered

Employees

Investors

Regulators

Comment

According to Sabancı Holding's ERM system, risks are categorized based on their nature under the clusters such as strategic risks, financial risks, operational risks and compliance risks. Each cluster is then rated based on parameters such as 'impact', 'likelihood', 'vulnerability' and 'speed of onset'.* The 'impact' is determined based on multiple dimensions such as financial, operational, legal, reputational, H&S, human resources and environmental impact. The Holding's Early Detection of Risk Committee (EDRC) convenes at least 6 times a year and evaluates the risks. Upon the suggestion of the EDRC, the BoD decides on the mitigation plans on risks that are deemed as high or critical. All mitigation actions are planned by the risk supervisors or department heads and assigned to a risk owner. We evaluate the risks arising from the water crisis by considering their negative effects based on the managed strategic business line and their operational implications. The key external environmental risks are water shortages, failure to meet the water demand in industrial production and operational disruptions in production due to insufficient resources. To reduce water consumption in general, we take certain actions, such as measuring, detecting and repairing the water losses and leaks in the lines, and collecting and recycling of surface waters. The implementation of these actions varies by sector across the Group companies.

Value chain stage

Supply chain

Coverage

Full

Risk assessment procedure

Water risks are assessed as part of an established enterprise risk management framework

Frequency of assessment

Annually

How far into the future are risks considered?

3 to 6 years

Type of tools and methods used

Enterprise risk management
Other

Tools and methods used

COSO Enterprise Risk Management Framework
ISO 31000 Risk Management Standard
Internal company methods
External consultants

Contextual issues considered

Water regulatory frameworks

Stakeholders considered

Regulators
Suppliers

Comment

According to Sabancı Holding's ERM system, risks are categorized based on their nature under the clusters such as strategic risks, financial risks, operational risks and compliance risks. Each cluster is then rated based on parameters such as 'impact', 'likelihood', 'vulnerability' and 'speed of onset'.* The 'impact' is determined based on multiple dimensions such as financial, operational, legal, reputational, H&S, human resources and environmental impact. The Holding's EDRC convenes at least 6 times a year and evaluates the risks. Upon the suggestion of the EDRC, the BoD decides on the mitigation plans on risks that are deemed as high or critical. All mitigation actions are planned by the risk supervisors or department heads and assigned to a risk owner. We evaluate the threats arising from the water crisis by considering their negative effects based on the managed strategic business line and their operational implications. The key external environmental risks are water shortages, failure to meet the water demand in industrial production and operational disruptions in production due to insufficient resources. Such risks include those that are related to supply chain. To reduce water consumption in general, we take certain actions, such as measuring, detecting and repairing the water losses and leaks in the lines, and collecting and recycling of surface waters. The implementation of these actions varies by sector across the Group companies.

Value chain stage

Other stages of the value chain

Coverage

Partial

Risk assessment procedure

Water risks are assessed as part of an established enterprise risk management framework

Frequency of assessment

Annually

How far into the future are risks considered?

3 to 6 years

Type of tools and methods used

Enterprise risk management
Other

Tools and methods used

COSO Enterprise Risk Management Framework
ISO 31000 Risk Management Standard
Internal company methods
External consultants

Contextual issues considered

Water availability at a basin/catchment level
Stakeholder conflicts concerning water resources at a basin/catchment level
Water regulatory frameworks
Access to fully-functioning, safely managed WASH services for all employees

Stakeholders considered

Employees
Regulators
Suppliers
Other, please specify (Investee companies)

Comment

According to Sabancı Holding's ERM system, risks are categorized based on their nature under the clusters such as strategic risks, financial risks, operational risks and compliance risks. Each cluster is then rated based on parameters such as 'impact', 'likelihood', 'vulnerability' and 'speed of onset'.* The 'impact' is determined based on multiple dimensions such as financial, operational, legal, reputational, H&S, human resources and environmental impact. The Holding's EDRC convenes at least 6 times a year and evaluates the risks. Upon the suggestion of the EDRC, the BoD decides on the mitigation plans on risks that are deemed as high or critical. All mitigation actions are planned by the risk supervisors or department heads and assigned to a risk owner. We evaluate the threats arising from the water crisis by considering their negative effects based on the managed strategic business line and their operational implications. The key external environmental risks are water shortages, failure to meet the water demand in industrial production and operational disruptions in production due to insufficient resources. To reduce water consumption in general, we take certain actions, such as measuring, detecting and repairing the water losses and leaks in the lines, and collecting and recycling of surface waters. The implementation of these actions varies by sector across the Group companies.

(W3.3b) Describe your organization's process for identifying, assessing, and responding to water-related risks within your direct operations and other stages of your value chain.

Risk Management: Sabancı Holding and Group companies use the Enterprise Risk Management (ERM) system.

During the assessment process, the risks are categorized based on their nature under four clusters, i.e. financial, strategic (incl. reputational and sustainability risks), operational and compliance. Each cluster is then rated based on parameters such as 'impact', 'likelihood', 'vulnerability' and 'speed of onset'.* The 'impact' is determined based on multiple dimensions such as financial, operational, legal, reputational, H&S, human resources and environmental impact. Holding EDRC convenes at least 6 times a year and monitors the risks by considering their final risk scores and categories. Upon the suggestion of the EDRC, Holding BoD decides on the mitigation plans on risks that are deemed as high or critical.

In principle, all mitigation actions are planned by the risk supervisors or department heads and assigned to a risk owner. Consequently, the action plan is conducted by the risk owner. The Holding's related risk owner and risk supervisor as well as the Holding risk management teams re-evaluate the residual risk level following the completion of mitigation actions.

The Holding offers guidance for the Group companies to be prepared for these risks and take precautions in their business models against any potential impact.

Definition of substantive financial impact** (2021): As per the financial impact, the threshold for the highest risk level is > TL 315 million

Definition of substantive strategic impact (2021): If the cluster of a risk is identified as 'strategic' AND the risk is rated as High or Critical* on the basis of inherent risks; then it is deemed to pose high strategic risks and prioritized to be reported to the EDRC.

*Following the calculation of final score based on impact, likelihood, vulnerability, speed of onset, the risks are categorized according to the following classification:

If the final score is:

- equals and higher than 3 than the risk is categories as "Critical",
- equals to 2.6 and between 2.6 and 3 than the risk is categories as "High",
- equals to 2 and between 2 and 2.6 than the risk is categories as "Medium",
- equals and lower than 2 than the risk is categories as "Low".

** Financial impact scores are as follows:

1- No loss

2- Up to TL 90 million

3- 90 million TL up to TL 175 million

4- 175 million TL up to TL 315 million

5- More than TL 315 million

The EDRC convened 6 times in 2021 and submitted risk assessments to the attention of the Board of Directors.

Water related risks are evaluated for each facility and also for critical supply chain/value chain partners, using WRI Aqueduct Water Risk Atlas.

For Baseline water risks we assess the following parameters:

- Baseline water stress
- Overall water risks
- Drought risk
- Riverine flood risk
- Physical risks, quantity
- Physical risks, quality
- Untreated wastewater
- Reputational risks

For future (2030) risks we assess:

- Water stress
- Water supply (Change from baseline)
- Water demand (Change from baseline)

Strategic Portfolio Management: As a Holding company, the most material part of our value chain in terms of environmental impact is our investments, i.e. the companies that we invest in our portfolio. Therefore, we pioneer and lead the sectors that we operate in via (1) our 5-year Strategic Plan, where "pioneering in sustainability" is among the five strategic directions and is part of our "Purpose" as the Group, (2) our Sustainability Roadmap, which is implemented by the entire Group, (3) performance management in which sustainability is embedded at a rate of 10% in senior management performance goals, (4) our asset allocation strategy in which sustainability is among the key drivers.

We make sure we capture the opportunities and mitigate the risks through these 4 pillars in addition to our ERM system.

In practice, our Sustainability Roadmap, which include water-related actions, is implemented through the Thematic Task Forces, consisting of experts from the Group

companies as well as the Sustainability Directorate which resides at Sabancı Holding. The Task Forces operate with an agile working model and ultimately report their work to the Sustainability Leadership Committee consisting of the Holding's Group Presidents.

The success of engagement is measured through Group-wide KPIs such as water intensity or the total percentage of water recycled and reused. Additionally, sustainability related KPIs are embedded in the performance assessment of the senior management in Group companies as explained above.

Detailed information on Sabancı Holding's water management approach is published on 2021 Sabancı Holding Sustainability Report, which can be accessed on Sabancı Holding's Investor Relations Website.

W4. Risks and opportunities

W4.1

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

Yes, both in direct operations and the rest of our value chain

W4.1a

(W4.1a) How does your organization define substantive financial or strategic impact on your business?

According to Sabancı Holding's ERM system, risks are categorized based on their nature under the clusters such as strategic risks, financial risks, operational risks and compliance risks. Each cluster is then rated based on parameters such as 'impact', 'likelihood', 'vulnerability' and 'speed of onset'.* The 'impact' is determined based on multiple dimensions such as financial, operational, legal, reputational, H&S, human resources and environmental impact. The Holding's Early Detection of Risk Committee (EDRC) convenes at least 6 times a year and evaluates the risks by considering their final risk scores and categories. Upon the suggestion of the EDRC, the BoD decides on the mitigation plans on risks that are deemed as high or critical.

In principle, all mitigation actions are planned by the risk supervisors or department heads and assigned to a risk owner. Consequently, the action plan is conducted by the risk owner. The Holding's related risk owner and risk supervisor as well as the Holding risk management teams re-evaluate the residual risk level following the completion of mitigation actions.

Definition of substantive financial impact (2021):** As per the financial impact, the threshold for the highest risk level is >TL 315 million.

Definition of substantive strategic impact (2021): If the cluster of a risk is identified as 'strategic' AND the risk is rated as High or Critical* on the basis of inherent risks; then it is deemed to pose high strategic risks and prioritized to be reported to the EDRC.

Example of physical risk drivers that are taken into consideration in energy sector are as follows:

- Climate change and drought leading to low water reservoir levels, disrupting electricity generation in hydro power plants

Example to transitional risk drivers that are taken into consideration in building materials sector are as follows:

- Gaps to climate friendly operational baseline leading to higher cost of funding

*Following the calculation of final score based on impact, likelihood, vulnerability, speed of onset, the risks are categorized according to the following classification:

If the final score is:

- equals and higher than 3 than the risk is categories as "Critical",
- equals to 2.6 and between 2.6 and 3 than the risk is categories as "High",
- equals to 2 and between 2 and 2.6 than the risk is categories as "Medium",
- equals and lower than 2 than the risk is categories as "Low".

** Financial impact scores for 2021 are as follows and are revised on an annual basis:

- 1- No loss
- 2- Up to TL 90 million
- 3- 90 million TL up to TL 175 million
- 4- 175 million TL up to TL 315 million
- 5- More than TL 315 million

W4.1b

(W4.1b) What is the total number of facilities exposed to water risks with the potential to have a substantive financial or strategic impact on your business, and what proportion of your company-wide facilities does this represent?

	Total number of facilities exposed to water risk	% company-wide facilities this represents	Comment
Row 1	0	Less than 1%	Since Sabancı Holding does not have any production or large-scale operations, we do not envisage any significant water-related situation that will create a substantive financial and strategic impact on the Holding's own operations. Having said that, the companies that we invest in may be impacted from such risks. The high-level risk assessment is conducted by Sabancı Holding for the entire Group and facility-level detailed analyses are conducted by our Group companies.

W4.1c

(W4.1c) By river basin, what is the number and proportion of facilities exposed to water risks that could have a substantive financial or strategic impact on your business, and what is the potential business impact associated with those facilities?

Country/Area & River basin

Turkey	Other, please specify (Marmara Basin)
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Number of facilities exposed to water risk

0

% company-wide facilities this represents

100%

Production value for the metals & mining activities associated with these facilities

<Not Applicable>

% company's annual electricity generation that could be affected by these facilities

<Not Applicable>

% company's global oil & gas production volume that could be affected by these facilities

<Not Applicable>

% company's total global revenue that could be affected

Less than 1%

Comment

Since Sabancı Holding does not have any production or large-scale operations, we do not envisage any significant water-related situation that will create a substantive financial and strategic impact on the Holding's own operations. Having said that, the companies that we invest in may be impacted from such risks. The high-level risk assessment is conducted by Sabancı Holding for the entire Group and facility-level detailed analyses are conducted by our Group companies.

W4.2

(W4.2) Provide details of identified risks in your direct operations with the potential to have a substantive financial or strategic impact on your business, and your response to those risks.

Country/Area & River basin

Turkey	Other, please specify (Marmara Basin, Konya Closed Basin, Black Sea South Coast Major, Kocaeli Minor Basin, East Mediterranean Basin, Sakarya Basin, Seyhan Basin, Yesilirmak Basin and Akarçay Basin.)
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Type of risk & Primary risk driver

Reputation & markets	Other, please specify (investor exit)
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Primary potential impact

Other, please specify (investor exit)

Company-specific description

If water-related issues are not properly managed by our Group companies, this may result in investor exit from Sabancı Holding shares. The basins reported in this section are excerpted from 2020 CDP Water Responses of our building materials and industrials group companies.

Timeframe

Current up to one year

Magnitude of potential impact

High

Likelihood

More likely than not

Are you able to provide a potential financial impact figure?

Yes, an estimated range

Potential financial impact figure (currency)

<Not Applicable>

Potential financial impact figure - minimum (currency)

3903000000

Potential financial impact figure - maximum (currency)

5701000000

Explanation of financial impact

The figures represent the amount of potential exit from Sabancı Holding shares (the exchange rates of the Central Bank of the Republic of Turkey as of end of July 2022). It is calculated based on an assumption on the geographic distribution of foreign investors and the level of their sensitivity on ESG issues given the legal frameworks and market developments in their specific region.

Primary response to risk

Introduce/strengthen water management incentives

Description of response

Sabancı Holding launched a Sustainability Roadmap which includes actions on the management water-related issues and is implemented by our Group companies.

Cost of response

1000000

Explanation of cost of response

The cost includes administrative costs of sustainability-related efforts at Sabancı Holding, including those that are related to consultancy costs and excluding staff remuneration.

W4.2a

(W4.2a) Provide details of risks identified within your value chain (beyond direct operations) with the potential to have a substantive financial or strategic impact on your business, and your response to those risks.

Country/Area & River basin

Indonesia	Brantas
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Stage of value chain

Supply chain

Type of risk & Primary risk driver

Chronic physical	Water stress
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Primary potential impact

Increased production costs due to changing input prices from supplier

Company-specific description

Natural rubber is one of the main components of one of our Group companies' products. According to the USTMA, natural rubber makes up 34% of a truck tire, making up most of any raw material or component. Passenger and light truck tires are 19% natural rubber, so the price of tires can be attributed to the price of rubber. Since it is an

agricultural product, the production of natural rubber is always dependent on the effects of climate, weather and disease. Unlike many agricultural crops that can be modified for different climates, the Para rubber tree requires tropical temperatures and precipitation that are only found in a few places on Earth. Major climatic changes in these regions will always be a threat to natural rubber production. According to the Association of Natural Rubber Producing Countries (ANRPC), adverse effects from climate and weather conditions contribute to production disruptions, which explains the drop in supply and the resulting price increases. In 2021 we have made an in-depth analysis using WRI-Aqueduct Water Risk Atlas Tool. We have selected 4 locations in Indonesia and Thailand from where we supply 79% of our natural rubber and analyzed the water-related risks on these locations. We have used the following parameters to assess current water stress levels: - Coastal flood risk - Riverine flood risk - Drought Risk - Water Stress - Overall water risk For future scenarios we have checked the water stress for 2030 and 2040 on both Optimistic, BAU & Pessimistic scenarios. As a result of this analysis, there is one location which is under extremely high water stress in all scenarios which is Surabaya, Java-Indonesia. However for all 4 locations the drought risk is Medium-High in current scenarios, which means this may also increase in future projections. Also in Balewan Indonesia the coastal flood risk is extremely high, and riverine flood risk extremely high in all 3 locations in Indonesia. 20.12% of our natural rubber comes from plantations in Surabaya, Java. If there is a water stress or drought in this location, as rubber is a highly demanded commodity, the water stress in this region may impact the rubber prices increasing our production costs. In the worst case scenario if the water stress impacts all 3 Indonesian plantations, then we may not be able to purchase any rubber which means we would be forced to halt our operations until we are able to reach this raw material.

Timeframe

More than 6 years

Magnitude of potential impact

Medium-low

Likelihood

Likely

Are you able to provide a potential financial impact figure?

Yes, an estimated range

Potential financial impact figure (currency)

<Not Applicable>

Potential financial impact figure - minimum (currency)

9139597

Potential financial impact figure - maximum (currency)

26350143

Explanation of financial impact

According to the Association of Natural Rubber Producing Countries (ANRPC), adverse effects from climate and weather conditions contribute to production disruptions, which explains the drop in supply and the resulting price increases. In December of 2021, due to adverse weather conditions and high precipitation distribution factors among major producing countries such as Thailand, Malaysia and Vietnam, the supply of natural rubber decreased by 3.7% with respect to the previous year. This decrease in supply caused an increase of 0.03 USD/kg in our natural rubber purchasing price. According to the analysis we have made using WRI Aqueduct, the supply may decrease more in the long-term. If the supply decreases 20% the impact on our purchasing price is calculated as 0.16 USD/kg. However, this projected increase in price is an optimistic approach as the market may not respond to a 20% decrease in production in the same way it did to a 3.7% decrease, especially considering the global tire market is expected to grow between 5 to 10% until 2030. If the market grows, and the supply reduces, the increase in unit prices of natural rubber may even be higher. The amount of natural rubber we bought in 2021 is 57,122,560 kg, accordingly the financial impact is calculated as follows: Min Financial impact: 57,122,560 kg x 0.03 USD/kg = 1,973,350 USD Max. Financial impact: 57,122,560 kg x 0.16 USD/kg = 9,139,610 USD (31 December 2021 TCMB forex selling rates are used to calculate impact in TL)

Primary response to risk

Upstream	Increase supplier diversification
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Description of response

Brisa's mother company, Bridgestone, works actively to reduce the impacts of this risk. They work on this risk in two ways: 1- To diversify natural rubber supply sources, Bridgestone is researching alternative plants other than Hevea brasiliensis. Bridgestone is promoting various research projects utilizing partnerships aimed at practical applications for guayule, a shrub that can be cultivated on land native to the arid region spanning the south-western United States to northern Mexico. Guayule requires a series of process to produce natural rubber consisting of grinding whole plant, solvent extraction and impurity removal, which is more complex than the natural rubber production process concerning para rubber trees that requires coagulation and drying of latex only. The Bridgestone Group has been conducting integrated R&D activities from cultivation technology, natural rubber extraction process to application to tires toward practical use of guayule. In 2015, the Bridgestone Group produced the first tire made from guayule-derived natural rubber. This was an impressive step toward "expansion and diversification of renewable resources." 2- To improve productivity, Bridgestone provides rubber tree seedlings to smallholder farmers and conducts technical training with the same productivity-improvement techniques the Group developed for its own rubber farms.

Cost of response

1669125

Explanation of cost of response

Investments were started in 2018 to reduce the risk of disruption in our supply chain that may arise from severe weather events, and as of the end of 2020, the total investment amount has reached 125,000 USD. The cost of response for this risk consists of the installation of a natural rubber testing equipment at Brisa Izmit Production Facility. (31 December 2021 TCMB forex selling rates are used to calculate the cost in TL)

Country/Area & River basin

Turkey	Other, please specify (Black Sea South Coast Major, Kocaeli Minor Basin)
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Stage of value chain

Use phase

Type of risk & Primary risk driver

Acute physical	Flood (coastal, fluvial, pluvial, groundwater)
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Primary potential impact

Impact on company assets

Company-specific description

Kordsa's (one of our Group companies) production facility in Izmit (KTR), Turkey is located next to a river and is therefore in the boundary of a river flood basin. Although not directly due to a precipitation related flood, the facility was exposed to flood related disruption in production in 2018. This incident was caused by the opening of nearby dam flood gates to release the excess water to maintain the dam operations at optimum level. However, in line with climate projections, it is expected that severe weather events will become more frequent (including extreme precipitation). If flooding occurs in that production facility, some of the assets may be impaired due to slime covering them, Kordsa may need to reduce or stop production for a certain period of time until operation and maintenance teams complete all the recovery and cleaning activities within the facility. Kordsa may also need to wait for a new set of machines, equipment or raw materials (if any damage occurs to them) to arrive before to start production again. Kordsa may face an increase in insurance premiums if the relevant insurance policies triggered due to the high magnitude of loss claim. Therefore, this facility is under the risk of several impact areas due to flooding.

Timeframe

4-6 years

Magnitude of potential impact

High

Likelihood

More likely than not

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact figure (currency)

66765000

Potential financial impact figure - minimum (currency)

<Not Applicable>

Potential financial impact figure - maximum (currency)

<Not Applicable>

Explanation of financial impact

The financial impact figure was determined by the expert opinion of risk engineer who visited site within last year and based on his scenario analysis. It has been assumed that about 15% of the total value would be damaged and business interruption is expected for 4 months to recover fully from the flooding. Considering the total value of the Entity for 2021 was 667M USD including the building, machinery, equipment, stocks and revenue. We took 15% of that value which is equal to 119M USD. Kordsa has an insurance policy covering the facility up to full value. Increased cost of working and debris removal is also covered under the policy. So, Kordsa is able to recover from that loss in financial perspective except the deductible portion. Considering the deductibles (150k USD) and time excess (7 days) portion of the policy, Kordsa will face 5M USD of financial impact due to flood. (31 December 2021 TCMB forex selling rates are used to calculate impact in TL)

Primary response to risk

Direct operations	Other, please specify (Insurance coverage, Consultancy (Risk reviews), Developing flood emergency action plans, Flood Monitoring and prevention activities)
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Description of response

Kordsa's response strategy can be identified under four items which are all reviewed as equally important in managing flood risk. 1st item is the insurance coverage that Kordsa purchases insurance providing flood coverage for its assets (building, machinery, equipment, stocks) including business interruption each year up to their full value. 2nd item is the consultancy received each year from experts of insurance companies to identify any improvement areas regarding flood risk. These improvement recommendations are always analysed by Kordsa engineers and for approved items, improvement projects are performed. 3rd Kordsa has emergency action plans and business continuity plans studies for each of its facility by Global Risk Management Department. These plans are also reviewed and updated each year. As indicated in plans task forces are built, necessary personnel are assigned with certain roles and backup plans are determined in case such flood event occurs. Lastly Kordsa performs various small – medium size improvement projects and conducts regular visits outside of the Entity premises. (potential bottleneck areas under municipality responsibility) Regular monitoring and maintenance of flood detection and prevention systems, cooperation activities with local municipality are mostly continuous activities that budgeted each year. However, the most effective method used as a response to this risk is to insure the facility against flooding.

Cost of response

14327769

Explanation of cost of response

The cost of response reported includes the total cost of all 4 items described above. The cost of first item (insurance policy) for 2021 is approximately 990 k USD, there is no additional cost for the 2nd item (Risk engineer review) since its already included in first item. Insurance companies do not charge separately for this service but include it in the premiums. Latest engineering visit was done in October 2021 and the visit report was received within November. The 3rd item of emergency and BCM plans are totally handled internally and there is no cost of applying these as well. These plans are also audited internally every year by audit department so reviewing was completed within June 2021 before the scheduled audit. For the last item there are ongoing and continuous activities that held within 2021. Entity spent \$83k for overall maintenance of flood monitoring and prevention systems (\$33k). This expenditure also includes the collaboration efforts with local municipality, local environment related taxes (\$50k) in which municipality collects it to maintain the nearby premises. (Maintenance of closed aqueducts, sewer systems) In total all these response strategies will add up to 1,1M USD cost for Kordsa. (31 December 2021 TCMB forex selling rates are used to calculate the cost in TL)

W4.3

(W4.3) Have you identified any water-related opportunities with the potential to have a substantive financial or strategic impact on your business?

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

W4.3a

(W4.3a) Provide details of opportunities currently being realized that could have a substantive financial or strategic impact on your business.

Type of opportunity

Markets

Primary water-related opportunity

Increased shareholder value

Company-specific description & strategy to realize opportunity

Management of climate emergency and water-related issues may lead to an increase in our ESG ratings and can ultimately lead to increased investor ownership of Sabancı Holding shares.

Estimated timeframe for realization

1 to 3 years

Magnitude of potential financial impact

Medium-high

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact figure (currency)

789000000

Potential financial impact figure – minimum (currency)

<Not Applicable>

Potential financial impact figure – maximum (currency)

<Not Applicable>

Explanation of financial impact

The financial impact takes into account the investors increasing their ownership of Sabancı Holding shares.

Type of opportunity

Products and services

Primary water-related opportunity

Sales of new products/services

Company-specific description & strategy to realize opportunity

Our Group companies invest in development of new products and services that promote sustainable business models. We monitor the total combined net sales revenues from more than 800 products and services that reduce resource use and carbon emissions, enable the transition to more sustainable technologies, enable the deployment of these technologies, and create positive social impact, on an annual basis. We believe our continuous efforts to diversify our sustainable products and services and tap into emerging green markets will lead to an increase in our revenues.

Estimated timeframe for realization

4 to 6 years

Magnitude of potential financial impact

Medium-high

Are you able to provide a potential financial impact figure?

Yes, an estimated range

Potential financial impact figure (currency)

<Not Applicable>

Potential financial impact figure – minimum (currency)

650000000

Potential financial impact figure – maximum (currency)

1300000000

Explanation of financial impact

We launched "sustainable products&services taxonomy" for the entire Group in order to identify the growth potential for sustainable business areas and drive innovation for new business areas/markets. We monitor the share of revenues from products and services that contribute SDGs including those that are related to climate on an annual basis (TL 7.7 billion in 2021). We may expect an additional amount of revenues at the range of 8,5% - 17% of 2021 figures, i.e. TL 7.7 billion.

W6. Governance

W6.1

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

Yes, we have a documented water policy that is publicly available

W6.1a

(W6.1a) Select the options that best describe the scope and content of your water policy.

	Scope	Content	Please explain
Row 1	Company-wide	<p>Description of business dependency on water</p> <p>Description of business impact on water</p> <p>Company water targets and goals</p> <p>Commitment to align with public policy initiatives, such as the SDGs</p> <p>Commitments beyond regulatory compliance</p> <p>Commitment to water-related innovation</p> <p>Commitment to stakeholder awareness and education</p> <p>Commitment to water stewardship and/or collective action</p> <p>Recognition of environmental linkages, for example, due to climate change</p> <p>Other, please specify (Incorporated within Group level Sustainability Roadmap & Environmental Policy & Environmental Statements in public reports)</p>	<p>Sabancı Holding Environmental Policy, Responsible Investment Policy, as well as the Group-wide Sustainability Roadmap is publicly available on our investor relations web site and applies to 100% of Group companies, since the majority of water-related impacts originate from our value chain activities, i.e. the investments. The water management strategy is embedded in both policies where we indicate our intention to spread good practices to stakeholders, promote stakeholder engagement/collective action, go beyond legal compliance and make use of innovation, technology and digitalization. On top of this, we declare both our dependency on water and our impact in our 2021 Sustainability Report, alongside with several breakdowns on our water consumption as the entire Group. Our long term goal on water is embedded in our 2050 goal to become zero waste and net zero emissions through a variety of measures including circular economy practices.</p> <p>SAHOL21-Sustainability-29.07.22_final.pdf</p> <p>SabancıGroupResponsibleInvestmentPolicyclean.pdf</p> <p>Sabancı-2021-annual-report.pdf</p>

W6.2

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

Yes

W6.2a

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

Position of individual	Please explain
Chief Executive Officer (CEO)	<p>The CEO holds the ultimate responsibility for the execution of Sustainability Roadmap. The Chairperson of the Sustainability Leadership Committee(*) informs the CEO quarterly on the progress and the Holding Board of Directors and the Board level Sustainability Committee (which includes independent BoD members) in every 6 months and receives their guidance and approval. Example of water-related decision made by the individual/committee: Our Sustainability Roadmap includes the encouragement of our Group companies on disclosing their water and climate-related data through CDP. The Roadmap is approved by our CEO and this action is explicitly communicated by our CEO to Group companies in a meeting held with the participation of all CEOs from the Group. (*)The Sustainability Leadership Committee, chaired by the Human Resources and Sustainability Group President in the Executive Board, ensures the alignment of the Holding and Group companies on sustainability goals, targets and actions. The Committee is also responsible for monitoring the progress in the goals and actions included in the Group's Sustainability Roadmap, and monitoring the efforts to manage risks that may adversely affect Sabancı's reputation and operations in ESG areas. It monitors international developments, public regulations and trends in sustainability and advises the Thematic Task Forces as needed. The Committee encourages the dissemination of expertise and good practices among Group companies.</p>
Board-level committee	<p>The Chairperson of the Sustainability Leadership Committee(*) informs the CEO quarterly and the Holding Board of Directors and the Corporate Governance, Appointment and Remuneration Committee (which includes BoD members) in every 6 months and receives their guidance and approval. Additionally, Sabancı Holding established a Board-level Sustainability Committee consisting of three independent BoD members in 2021 with a mandate of oversight on sustainability-related performance of the Holding. Example of water-related decision made by the individual/committee: Our Sustainability Roadmap includes the encouragement of our Group companies on disclosing their water and climate-related data through CDP. The Roadmap is approved by our CEO and the entire Board of Directors. (*)The Sustainability Leadership Committee, chaired by the Human Resources and Sustainability Group President in the Executive Board, ensures the alignment of the Holding and Group companies on sustainability goals, targets and actions. The Committee is also responsible for monitoring the progress in the goals and actions included in the Group's Sustainability Roadmap, and monitoring the efforts to manage risks that may adversely affect Sabancı's reputation and operations in ESG areas. It monitors international developments, public regulations and trends in sustainability and advises the Thematic Task Forces as needed. The Committee encourages the dissemination of expertise and good practices among Group companies.</p>

W6.2b

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

	Frequency that water-related issues are a scheduled agenda item	Governance mechanisms into which water-related issues are integrated	Please explain
Row 1	Scheduled - some meetings	Monitoring implementation and performance Reviewing and guiding business plans Reviewing and guiding major plans of action Reviewing and guiding risk management policies Reviewing and guiding strategy Reviewing and guiding corporate responsibility strategy	Climate emergency and water-related issues constitute an important part of Sabancı Holding’s sustainability efforts, given its Group-wide long term goal of being net zero emissions and zero waste by 2050 at the latest. Such topics are brought to the agenda of BoD members through a variety of channels including the Board-level Sustainability Committee.

W6.2d

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

	Board member(s) have competence on water-related issues	Criteria used to assess competence of board member(s) on water-related issues	Primary reason for no board-level competence on water-related issues	Explain why your organization does not have at least one board member with competence on water-related issues and any plans to address board-level competence in the future
Row 1	Yes	We believe that having members on the Board of Directors who possess a diverse range of competencies, knowledge and experience strengthens the Board’s functioning and benefits decision-making processes. Research shows that companies with a diverse board of directors have 36% more profitability than others. The process of being nominated for the Board of Directors membership is not solely limited to gender equality in terms of diversity and inclusion. We evaluate the competencies of candidates by considering various factors, such as knowledge of the industry, management experience, knowledge in ESG matters, crisis management experience, and global and long-term thinking. 89% of our Board Members have ESG experience. The Skills Matrix can be seen in our 2021 Sustainability Report’s Governance section. Members of our Board of Directors are active members of several climate related foundations, associations and initiatives.	<Not Applicable>	<Not Applicable>

W6.3

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

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

Chief Executive Officer (CEO)

Responsibility

Assessing water-related risks and opportunities
 Managing water-related risks and opportunities

Frequency of reporting to the board on water-related issues

More frequently than quarterly

Please explain

The CEO of Sabancı Holding (also a member of the BoD) oversees the implementation of Sustainability Roadmap and monitors the progress on a quarterly basis. The CEO holds the ultimate responsibility for the execution of Sustainability Roadmap. ESG performance (in the form of an international ESG rating), including but not limited to those that are related to water issues, are embedded in senior management's performance goals at the rates of 10-15% (10% for Group Presidents; 15% for CEOs).

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

Other, please specify (Sustainability Leadership Committee)

Responsibility

Assessing water-related risks and opportunities

Frequency of reporting to the board on water-related issues

Quarterly

Please explain

The Sustainability Leadership Committee, chaired by the Human Resources and Sustainability Group President in the Executive Board, ensures the alignment of the Holding and Group companies on sustainability goals, targets and actions. The Committee is also responsible for monitoring the progress in the goals, targets and actions included in the Group's Sustainability Roadmap, and monitoring the efforts to manage risks that may adversely affect Sabancı's reputation and operations in ESG areas. It monitors international developments, public regulations and trends in sustainability and advises the Thematic Task Forces as needed. The Committee encourages the dissemination of expertise and good practices among Group companies. The Chairperson of the Committee informs the CEO (who is also a member of BoD) on a quarterly basis and the Holding Board-level Sustainability Committee every six months and receives their guidance and approval.

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

Other C-Suite Officer, please specify (Group President, HR and Sustainability)

Responsibility

Assessing water-related risks and opportunities
 Managing water-related risks and opportunities

Frequency of reporting to the board on water-related issues

Half-yearly

Please explain

The Sustainability Leadership Committee, chaired by the Human Resources and Sustainability Group President in the Executive Board, ensures the alignment of the Holding and Group companies on sustainability goals, targets and actions. The Committee is also responsible for monitoring the progress in the goals, targets and actions included in the Group's Sustainability Roadmap, and monitoring the efforts to manage risks that may adversely affect Sabancı's reputation and operations in ESG areas. It monitors international developments, public regulations and trends in sustainability and advises the Thematic Task Forces as needed. The Committee encourages the dissemination of expertise and good practices among Group companies. The Chairperson of the Committee informs the CEO (who is also a member of BoD) on a quarterly basis and the Holding BoD-level Sustainability Committee every six months and receives their guidance and approval.

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

Other C-Suite Officer, please specify (Risk Committee)

Responsibility

Assessing water-related risks and opportunities
 Managing water-related risks and opportunities

Frequency of reporting to the board on water-related issues

More frequently than quarterly

Please explain

According to Sabancı Holding's ERM system, risks are categorized based on their nature under the clusters such as strategic risks, financial risks, operational risks and compliance risks. Each cluster is then rated based on parameters such as 'impact', 'likelihood', 'vulnerability' and 'speed of onset'.* The 'impact' is determined based on multiple dimensions such as financial, operational, legal, reputational, H&S, human resources and environmental impact. The Holding's Risk Coordination Committee convenes on a regular basis and evaluates the risks by considering their final risk scores and categories. Upon the suggestion of the EDRC (the higher-level risk committee informed by the Risk Coordination Committee), the BoD decides on the mitigation plans on risks that are deemed as high or critical.

W6.4

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

	Provide incentives for management of water-related issues	Comment
Row 1	Yes	ESG performance, including but not limited to those that are related to water issues, are embedded in senior management's performance goals at the rates of 10-15% (10% for Group Presidents; 15% for CEO, who is also a member of BoD)

W6.4a

(W6.4a) What incentives are provided to C-suite employees or board members for the management of water-related issues (do not include the names of individuals)?

	Role(s) entitled to incentive	Performance indicator	Please explain
Monetary reward	Corporate executive team Chief Executive Officer (CEO) Chief Financial Officer (CFO) Other, please specify (Sustainability Director and Manager)	Other, please specify (Implementation of Sustainability Roadmap which includes water-related actions and targets; Increase in ESG ratings which also include water-related issues, increasing transparency on Climate & Water related issues)	ESG performance, including but not limited to those that are related to climate issues, are embedded in senior management's performance goals at the rates of 10-15% (10% for Group Presidents including the CFO; 15% for CEO, who is also a member of BoD). 100% of the scorecard of Sustainability Director and Manager is consisting of sustainability criteria, including increasing transparency and the management of water-related issues across the Group companies (i.e. investment portfolio).
Non-monetary reward	Other, please specify (Employees) No one is entitled to these incentives	<Not Applicable>	As Sabancı Holding, we hold Sabancı Golden Collar Awards, one of the most critical components of Recognition and Appreciation systems, with live broadcast to all Group companies. A total of 148 projects competed in the Sabancı of New Generation: Innovation, Customer Experience, Lean Transformation & Continuous Development and Digitalization. Best practices were rewarded with the votes of Group employees. In 2021, one of the categories is directly related to sustainability, including but not limited to water-related projects.

W6.5

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

- Yes, direct engagement with policy makers
- Yes, trade associations
- Yes, other

W6.5a

(W6.5a) What processes do you have in place to ensure that all of your direct and indirect activities seeking to influence policy are consistent with your water policy/water commitments?

Sabancı Holding takes an active role in national and international business-led sustainability platforms such as WBCSD, BSCD Turkey and the environmental working groups of TUSIAD (The Turkish Industry and Business Association). The Holding makes sure that the outcome of the working group studies and white papers issued in these platforms are in line with its own strategy through its active participation and engagement with those organizations. This is achieved via the Holding's strong representation in the BoD or the working groups, some of which are chaired by the Holding's senior management. The potential inconsistencies between the strategy of the Holding and such platforms are mostly prevented *before they occur*, through an assessment process prior to the approval of the Holding's membership.

Additionally, our Sustainability Roadmap is reviewed on annual basis in the light of rapidly changing ESG trends including the policies and recommendations of business led sustainability platforms. In case of inconsistency with such trends, our Sustainability Roadmap is updated and Group companies are informed/guided via Thematic Task Forces.

W6.6

(W6.6) Did your organization include information about its response to water-related risks in its most recent mainstream financial report?

- Yes (you may attach the report - this is optional)
- Sabancı-2021-annual-report.pdf

W7. Business strategy

W7.1

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

	Are water-related issues integrated?	Long-term time horizon (years)	Please explain
Long-term business objectives	Yes, water-related issues are integrated	21-30	At Sabancı Holding, we see water as a fundamental natural capital for all sectors in which we operate. We are aware that disruption in water supply due to factors such as draught and water-related extreme events like floods will adversely affect all business processes in our value chain. Accordingly, we define our impact on water resources on an industry basis and our Group companies carry out studies focused on efficiency, recovery and savings to manage water in a sustainable manner. This vision is reflected in our long-term sustainability goals as the Group to become net zero emissions and zero waste by 2050 at the latest and to increase continuously circular economy practices. We also have water related actions including the better identification of water-related risks and increasing the disclosure on water issues in our Sustainability Roadmap, which applies 100% of our Group companies. Our efforts to help tackle climate emergency as well as to manage our waste including wastewater and to increase circular economy practices will result in efficient management of water resources.
Strategy for achieving long-term objectives	Yes, water-related issues are integrated	21-30	Our strategy to reach the Holding's long term goals include enhancing sustainability governance, risk and opportunity assessment, increasing the share of products and services that positively contribute sustainability, increasing circular economy practices and the transparency on ESG performance including those that are related to water.
Financial planning	Yes, water-related issues are integrated	21-30	Holding level: One of the key drivers of the Holding's capital allocation decisions is sustainability. As indicated in our Purpose, i.e. We unite Turkey and the World for a sustainable life with leading enterprises, sustainability will continue to drive our investment decisions in the long run. Group-wide: On the other hand our investee companies, i.e. Group companies, develop sustainable products, services and business models, commit to TL 200 billion in sustainable financing by 2030 and a sustainable mutual fund balance of TL 15 billion by 2030. We also have water related actions including the better identification and management of water-related risks and increasing the disclosure on water issues in our Sustainability Roadmap, which applies 100% of our Group companies. The Roadmap influence the financial planning of the Group in terms of operational and capital expenditures.

W7.2

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

Row 1

Water-related CAPEX (+/- % change)

0

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

0

Water-related OPEX (+/- % change)

2

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

0

Please explain

During the COVID-19 pandemic, there had been no significant CAPEX made by the Holding on water, since we do not have large service operations nor manufacturing activities. On the other hand, COVID-19 restrictions in offices resulted in a decrease in water-related OPEX in 2020 and 2021, which consists of water withdrawal. In the coming years, a new concept of working model will be launched including the renewal of offices to make them more eco-efficient within the scope of our Group-wide Future of Work Program. Having said that, we do not expect a major OPEX/CAPEX increase specific on water given the size of our operations at the HQs and due to our assumption that remote working conditions will remain.

W7.3

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

	Use of scenario analysis	Comment
Row 1	Yes	Climate/water-related scenario analyses are made by some of our Group companies. Such analyses include the long term changes in precipitation, drought and extreme water-related weather events.

W7.3a

(W7.3a) Provide details of the scenario analysis, what water-related outcomes were identified, and how they have influenced your organization's business strategy.

	Type of scenario analysis used	Parameters, assumptions, analytical choices	Description of possible water-related outcomes	Influence on business strategy
Row 1	Other, please specify	We use WRI Water Risk Atlas Tool as a tool for water related scenario analysis. The tool estimates indicators of water demand (withdrawal and consumptive use), water supply, water stress (the ratio of water withdrawal to supply), and intra-annual (seasonal) variability for the periods centered on 2020, 2030, and 2040 for each of two climate scenarios. We have used the following parameters to assess current water stress levels: - Coastal flood risk - Riverine flood risk - Drought Risk - Water Stress - Overall water risk When using the tool we include baseline (2020), 2030 and 2040 projections for both optimistic and pessimistic scenarios to get a broader understanding of our water-related risks.	Indirect impact: Our Group companies may be affected in several ways such as reduced revenues, increased OPEX due to reduced access to water resources or service interruption due to extreme weather events.	As an example to our Group companies, Brisa's Izmit Production Facility is considered as being exposed to chronic physical risks as it is located in the flood plain of Akarca River and has previously experienced flood related problems. As per IPCC 5th assessment report rains will decrease all over Turkey with medium confidence. It may cause generation loss due to decreased inflow to our hydro power plants. 43.60% of Enerjisa Üretim's (i.e. one of our Group companies) installed capacity consists of renewable sources (in which 37.50% is hydro and 6.1% is wind&solar) in 2021. The company currently has 1,35 GW of hydroelectric installed capacity. Enerjisa Üretim maps the transition to green and low carbon energy by using different input parameters for scenario development with geographic, social & economic factors. The drought that hit the country in 2021 had a major impact on the generation of hydro power generation of Enerjisa Üretim hydro power plants. As a result of real-time monitoring, an early warning system has been established against meteorological and hydrological risks that may occur in Enerjisa Üretim basins. On the other hand Çimsa (i.e. one of our Group companies) conducts R&D activities for low water consuming products and looks for decreasing the water footprint in its processes. In this regard, Çimsa strictly applies ISO 14046 - Water Management Standard in all manufacturing facilities and follows water consumption rates to reduce water consumption levels.

W7.4

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

Row 1

Does your company use an internal price on water?

No, but we are currently exploring water valuation practices

Please explain

Our company does not use an internal price on water at the moment, but we are exploring water valuation practices.

W7.5

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

	Products and/or services classified as low water impact	Definition used to classify low water impact	Primary reason for not classifying any of your current products and/or services as low water impact	Please explain
Row 1	Yes	Our Group company Kordsa's CoKoon Dipping Technology High quality tires must meet many requirements: performance, endurance, safety and sustainability. Therefore, textile plies require an excellent and eco-friendly bonding to the rubber. Kordsa developed CoKoon by joining R&D forces with Continental. CoKoon is an eco-friendly dip technology which replaces both resorcinol and formaldehyde by an environmental friendly solution without sacrificing any safety or performance criteria according to the results of the current development status. CoKoon changed the 100-year rubber-based formula with an eco-friendlier one, after a 10-year R&D work. Kordsa provides the CoKoon technology which does not require additional costs and can be applied without changing process equipment to everyone who wants to take part in a free of charge licensing pool established together with Continental. CoKoon is positioned to be the new industry standard which offers innovation in both product and business model.	<Not Applicable>	As the Holding, we do not have a product or service with a low water impact, but one of the group companies, Kordsa, has a low water impact CoKoon Dipping Technology service.

W8. Targets

W8.1

(W8.1) Describe your approach to setting and monitoring water-related targets and/or goals.

	Levels for targets and/or goals	Monitoring at corporate level	Approach to setting and monitoring targets and/or goals
Row 1	Company-wide targets and goals Business level specific targets and/or goals Activity level specific targets and/or goals Site/facility specific targets and/or goals Country level targets and/or goals Basin specific targets and/or goals	Targets are monitored at the corporate level Goals are monitored at the corporate level	Group-wide targets and goals include becoming net zero emissions and zero waste (incl. waste water) by 2050 at the latest and increasing circular economy practices including water reuse. We monitor the progress towards these goals and targets with activity and/or country-level KPIs such as the share of sustainability driven R&D, share of revenues from products and services that positively contribute sustainability, share of water recycled/reused and the like. Detailed targets such as those that are facility-specific are set by our Group companies, since the Holding's own operations does not have significant water impact.

W8.1a

(W8.1a) Provide details of your water targets that are monitored at the corporate level, and the progress made.

Target reference number

Target 1

Category of target

Water withdrawals

Level

Site/facility

Primary motivation

Reduced environmental impact

Description of target

Our Group company Brisa's İzmit facility is responsible for 100% of their groundwater withdrawals which make 54.45% of their total withdrawals. Brisa İzmit Facilities' mid-term water target is to reduce the absolute water withdrawals from groundwater sources in İzmit Production Facility by 75% until 2025 against a baseline year of 2008.

Quantitative metric

Absolute reduction in total water withdrawals

Baseline year

2008

Start year

2013

Target year

2025

% of target achieved

84.04

Please explain

In 2020 design activities were started for installing a Wastewater Recovery Plant in İzmit Production Facility which is completed in March 2021 and considerably contributes to achieving this facility-based target. This will have a positive impact on our water consumption per unit production and enabled us to successfully complete their target. By the end of 2021, we have reduced our water footprint & consumption by 63.03% compared to 2008 in total.

Target reference number

Target 2

Category of target

Product water intensity

Level

Company-wide

Primary motivation

Water stewardship

Description of target

This target covers all Kordsa (i.e. one of our Group companies) global tire-reinforcement production activities. Their target is to reduce water withdrawal per ton of product by 50% by the year 2030. This target has been set in 2019 and their base year is also 2019.

Quantitative metric

% reduction per unit of production

Baseline year

2019

Start year

2019

Target year

2030

% of target achieved

26.38

Please explain

In 2019 the intensity figure (m3 withdrawal / ton of product) was 13.49 m3/ton. In 2021, this figure went down to 11.71 m3/ton showing a 13.19% decrease. As their target is to reduce our water withdrawal / ton by 50% until 2030, % of target achieved is calculated as $13.19 / 50 = 26.38\%$

Target reference number

Target 3

Category of target

Water withdrawals

Level

Site/facility

Primary motivation

Other, please specify (Product water intensity)

Description of target

Our Group company Brisa's Aksaray facility is responsible for 17.30% of their water withdrawals. Brisa Aksaray Facilities' water target is to reduce the product water intensity (m3 of water withdrawn per ton of product) in Aksaray OIZ Production Facility by 70% until 2030 against a baseline year of 2019.

Quantitative metric

% reduction per product

Baseline year

2019

Start year

2021

Target year

2030

% of target achieved

70.71

Please explain

Aksaray Production Facility began production in 2018 and was designed in a way to treat and store amount of water that is needed to meet its own water demand. This will have a positive impact on our water consumption per unit production and will enable us to successfully complete our target. By the end of 2021, they have reduced product water intensity by 49.5% in total, achieving 70.71% of our target.

W8.1b

(W8.1b) Provide details of your water goal(s) that are monitored at the corporate level and the progress made.

Goal

Other, please specify (Increase circular economy practices in business activities of Group companies)

Level

Company-wide

Motivation

Climate change adaptation and mitigation strategies

Description of goal

Group-wide targets and goals include becoming net zero emissions and zero waste (incl. waste water) by 2050 at the latest and increasing circular economy practices. We monitor the progress towards these goals with activity and/or country-level KPIs such as the share of sustainability driven R&D, share of revenues from products and services that positively contribute sustainability, share of water recycled/reused and the like. Detailed targets such as those that are basin-specific are set by our Group companies, since the Holding's own operations does not have significant water impact.

Baseline year

2021

Start year

2021

End year

2050

Progress

The rate of water recycled/reused across all group companies has been %23 in 2021. Our goal is to increase this rate in the long run.

W9. Verification

W9.1

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

Yes

W9.1a

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

Disclosure module	Data verified	Verification standard	Please explain
W1 Current state	Water discharge	ISAE 3000	Our main economic, environmental and social indicators including water related data have been verified by external assurance provider PWC in accordance with ISAE 3000 standards.
W1 Current state	Total water consumption	ISAE 3000	Our main economic, environmental and social indicators including water related data have been verified by external assurance provider PWC in accordance with ISAE 3000 standards.
W1 Current state	Surface water (river/lake)	ISAE 3000	Our main economic, environmental and social indicators including water related data have been verified by external assurance provider PWC in accordance with ISAE 3000 standards.
W1 Current state	Rain water	ISAE 3000	Our main economic, environmental and social indicators including water related data have been verified by external assurance provider PWC in accordance with ISAE 3000 standards.
W1 Current state	Well/Brackish water	ISAE 3000	Our main economic, environmental and social indicators including water related data have been verified by external assurance provider PWC in accordance with ISAE 3000 standards.
W1 Current state	Mains water	ISAE 3000	Our main economic, environmental and social indicators including water related data have been verified by external assurance provider PWC in accordance with ISAE 3000 standards.

W10. Sign off

W-FI

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

With the launch of our 2021 Sustainability Report with KPIs that represent not only the Holding itself but also our value chain (i.e. investments/Group companies) and which are assured by a third party, we significantly increased our transparency on water and climate-related issues. As Sabancı Holding, we are committed to enhance the scope and depth of our climate and water-related disclosure in the coming years.

More information on our sustainability performance can be found in 2021 Sabancı Sustainability Report, publicly available at https://yatirimciiliskileri.sabanci.com/en/SAHOL21-Sustainability-29.07.22_final.pdf

W10.1

(W10.1) Provide details for the person that has signed off (approved) your CDP water response.

	Job title	Corresponding job category
Row 1	CEO	Chief Executive Officer (CEO)

W10.2

(W10.2) Please indicate whether your organization agrees for CDP to transfer your publicly disclosed data on your impact and risk response strategies to the CEO Water Mandate's Water Action Hub [applies only to W2.1a (response to impacts), W4.2 and W4.2a (response to risks)].

Yes

Submit your response

In which language are you submitting your response?

English

Please confirm how your response should be handled by CDP

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

Please confirm below

I have read and accept the applicable Terms