SABANCI HOLDİNG A.Ş.

2025 CDP Corporate Questionnaire 2025

Word version

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

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09/18/2025, 06:33 am

Contents

C1. Introduction

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

Select from:

☑ English

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

Select from:

☑ TRY

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

(1.3.1) Type of financial institution

Select from:

☑ Other, please specify :Investment Holding

(1.3.2) Organization type

Select from:

☑ Publicly traded organization

(1.3.3) Description of organization

Hacı Ömer Sabancı Holding A.Ş. (Sabancı Holding), Türkiye's leading investment holding, is engaged in a wide variety of business activities through subsidiaries and affiliates mainly in the banking, financial services, energy and climate technologies, material technologies and mobility solutions and digital sectors. Sabancı Holding is domiciled in the Republic of Türkiye, with headquarters in İstanbul. Sabancı Holding coordinates and supports the finance, strategy, business development, legal, human capital and sustainability functions of Group companies. The Holding aims to ensure that Group companies operate in a manner that is profitable and sustainable with favorable competitive conditions. In addition, Sabancı Holding sets and monitors the corporate governance practices that apply across Sabancı Group. Sabancı Family jointly controls Sabancı Holding as a majority shareholder, while 53.23% of the Holding's shares is publicly traded. Sabancı Holding shares have been listed on Borsa İstanbul, Türkiye, since July 8th, 1997. Sabancı Holding stock trades under the symbol SAHOL at Borsa İstanbul Stock Exchange's Stars Market. As of year-end 2024, Sabancı Holding and its 11listed subsidiaries' shares constitute around 6% of the total market capitalization of Borsa İstanbul. At the

end of 2024, Sabancı Holding's net asset value reached USD 10.6 billion, marking an annual increase of 20%.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 Capital and Sustainability alongside the other members. The Executive Committee reports to the Board of Directors. Sabancı Holding considers sustainability as an integral part of its mission and strategy. As part of the rapid and sharp transformation based on technology and sustainability, Group's purpose is defined as "We unite Türkiye and the World for a sustainable life with leading enterprises." Sabancı Holding has formulated a comprehensive decarbonization strategy to address potential risks for achieving the 1.5C goal. Specific measures and actions for both Sabancı Holding and its Group companies were outlined to mitigate their environmental impact. Sabancı Holding has determined 15 decarbonization levers designed to accelerate the transition process, effectively decarbonizing the various industries in which Sabancı Group is actively engaged. Committed to 2050 Net Zero goals, Sabancı Group has set ambitious targets. As a strategic investment holding, Sabancı Holding has committed to a 15% reduction in Scope 1 & 2 GHG emissions by 2025 and a 42% reduction in Scope 1 & 2 GHG emissions by 2030 versus 2021 baseline without using carbon offsets. This effort was vital in identifying key areas for improvement towards Sabancı Holding's Net Zero Emissions target. In addition, the interim target is aligned with the recommended reductions in 1.5C pathway of the globally recognized Science Based Targets initiative (SBTi). Besides its decarbonization strategy, Sabancı Holding also expanded its focus from decarbonization alone to a comprehensive nature agenda, rooted in both an outside-in and inside-out perspective and became the first Holding in Türkiye to publish a Nature Pledge (https://yatirimciiliskileri.sabanci.com/en/images/pdf/sabanci-nature-pledge.pdf) outlining its future nature-related goals. Detailed information on Sabancı Holding's climate approach is published Sabancı Holding Sustainability For a Better Life 2024 Report, which can be accessed on Sabancı Holding's Investor Relations Website (https://yatirimciiliskileri.sabanci.com/en/) and Sustainability Report Website (https://yatirimciiliskileri.sabanci.com/en/images/pdf/sabanci-holding-sustainability-for-a-better-life-2024-report.pdf).
[Fixed row]

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

	End date of reporting year	Alignment of this reporting period with your financial reporting period	Indicate if you are providing emissions data for past reporting years
	12/30/2024	*Select from:* ☑ Yes	*Select from:* ☑ No

[Fixed row]

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

1243518568356.35

(1.5) Provide details on your reporting boundary.

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

[Fixed row]

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

ISIN code - bond

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

ISIN code - equity

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ Yes

(1.6.2) Provide your unique identifier

TRASAHOL91Q5

CUSIP number

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

Ticker symbol

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

SEDOL code

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

LEI number

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

D-U-N-S number

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

Other unique identifier

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

[Add row]

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

Select all that apply

☑ Turkey

(1.9) What was the size of your organization based on total assets value at the end of the reporting period?

3073678933000

(1.10) Which activities does your organization undertake, and which industry sectors does your organization lend to, invest in, and/or insure?

Banking (Bank)

(1.10.1) Activity undertaken

Select from:

☑ No

Investing (Asset manager)

(1.10.1) Activity undertaken

Select from:

☑ No

Investing (Asset owner)

(1.10.1) Activity undertaken

Select from:

☑ Yes

(1.10.3) Reporting the portfolio value and % of revenue associated with the portfolio

Select from:

☑ Yes, both the portfolio value and the % of revenue associated with it

(1.10.4) Portfolio value based on total assets

3073578933000

(1.10.5) % of revenue

100

(1.10.6) Type of clients

Select all that apply

☑ Asset owners

☑ Retail clients

☑ Institutional investors

☑ Business and private clients (banking)

☑ Family offices / high network individuals

☑ Corporate and institutional clients (companies)

(1.10.7) Industry sectors your organization lends to, invests in, and/or insures

Select all that apply

☑ Retail

☑ Services

☑ Materials

☑ Manufacturing

☑ Power generation

☑ Infrastructure

Insurance underwriting (Insurance company)

(1.10.1) Activity undertaken

Select from:
☑ No
[Fixed row]

(1.24) Has your organization mapped its value chain?

(1.24.1) Value chain mapped

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

(1.24.2) Value chain stages covered in mapping

Select all that apply
☑ Upstream value chain
☑ Portfolio

(1.24.3) Highest supplier tier mapped

Select from:
☑ Tier 1 suppliers

(1.24.4) Highest supplier tier known but not mapped

Select from:
☑ All supplier tiers known have been mapped

(1.24.5) Portfolios covered in mapping

Select all that apply

☑ Investing (Asset owner)

(1.24.7) Description of mapping process and coverage

Sabancı Holding developed a Group wide Responsible Investment Policy to guide the capital allocation decisions of Sabancı Holding and to ensure the sustainability of the Group's value chain. With this policy, the Holding conducts its provisions on incentivizing suppliers and investees with better climate disclosures and net zero emissions targets. The Responsible Investment Policy aims to establish the foundational principles for companies within the Holding's investment portfolio, aligning with national and international standards and best practices. This policy supports better management of risks related to these issues and demonstrates the Holding's commitment to contributing positively to the Sustainable Development Goals, improving ESG performance across the entire value chain, and conducting its activities with a focus on creating a positive impact on the environment and society. Within the scope of Responsible Investment Policy, all investee group companies, all customers, companies that supply goods and services to group companies and other business partners are identified as value chain, and this policy applies for all these stakeholders, providing 100% coverage within the Sabancı Group value chain.
[Fixed row]

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

	Plastics mapping	Portfolios covered in mapping
	Select from: ☑ Yes, we have mapped or are currently in the process of mapping plastics in our value chain	*Select all that apply* ☑ Investing (Asset owner)

[Fixed row]

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

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

Short-term

(2.1.1) From (years)

0

(2.1.3) To (years)

1

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

This period is when the company focuses on annual budgeting, business plans, and ongoing operations. During this timeframe, elements such as monitoring operational targets, managing cash flow, controlling costs, and swiftly adapting to regulatory developments are prioritized.

Medium-term

(2.1.1) From (years)

1

(2.1.3) To (years)

5

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

In this period, when the company implements its strategic plans, topics such as the commissioning of investments, growth and transformation in both existing and new business areas gain importance.

Long-term

(2.1.1) From (years)

5

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

Select from:

☑ Yes

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

This period is when the company shapes its forward-looking vision, completes large-scale transformation projects, and concretizes its long-term value creation goals. [Fixed row]

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

	Process in place	Dependencies and/or impacts evaluated in this process
	Select from: ☑ Yes	*Select from:* ☑ Both dependencies and impacts

[Fixed row]

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

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

[Fixed row]

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

Row 1

(2.2.2.1) Environmental issue

Select all that apply

☑ Climate change

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

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☑ Direct operations

☑ Upstream value chain

☑ End of life management

(2.2.2.4) Coverage

Select from:

☑ Full

(2.2.2.5) Supplier tiers covered

Select all that apply

☑ Tier 1 suppliers

(2.2.2.7) Type of assessment

Select from:

☑ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

☑ More than once a year

(2.2.2.9) Time horizons covered

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(2.2.2.10) Integration of risk management process

Select from:

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

(2.2.2.11) Location-specificity used

Select all that apply

☑ Not location specific

(2.2.2.12) Tools and methods used

Enterprise Risk Management

☑ COSO Enterprise Risk Management Framework

☑ Enterprise Risk Management

☑ ISO 31000 Risk Management Standard

International methodologies and standards

☑ Environmental Impact Assessment

☑ IPCC Climate Change Projections

☑ ISO 14001 Environmental Management Standard

☑ Other international methodologies and standards, please specify :IFRS S2

Other

☑ Desk-based research

☑ External consultants

☑ Materiality assessment

☑ Scenario analysis

☑ Other, please specify :Moody’s Climate on Demand Pro

(2.2.2.13) Risk types and criteria considered

Acute physical

☑ Drought

☑ Flood (coastal, fluvial, pluvial, ground water)

☑ Wildfires

Chronic physical

☑ Water availability at a basin/catchment level

Policy

☑ Carbon pricing mechanisms

☑ Changes to international law and bilateral agreements

☑ Changes to national legislation

Market

☑ Uncertainty in the market signals

Reputation

☑ Increased partner and stakeholder concern and partner and stakeholder negative feedback

Technology

☑ Transition to lower emissions technology and products

Liability

☑ Non-compliance with regulations

(2.2.2.14) Partners and stakeholders considered

Select all that apply

☑ NGOs

☑ Employees

☑ Investors

☑ Suppliers

☑ Regulators

☑ Local communities

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

Select from:

☑ No

(2.2.2.16) Further details of process

Sabancı Holding and its investee companies use an Enterprise Risk Management (ERM) system that focuses on identifying and evaluating various risks, particularly critical and high-priority ones related to its investee companies. This system continuously tracks performance changes in these risks, providing regular monitoring and reporting. To keep an eye on the risks faced by the Group companies, Key Risk Indicators (KRIs) are set by Sabancı Holding and its subsidiaries. These indicators are consistently monitored and reported on a periodic basis. Risks are prioritized based on their significance and potential impact, and they are managed within predefined tolerance limits aligned with the organization's risk appetite. These limits are established through both modelling studies and qualitative assessments, and they are periodically reviewed by the Risk Management Unit and approved by the EDRC. Tools & methods used / Company specific risk management system and internal methods: The Sustainability Committee of the Holding regularly monitors climate risks across the sectors in which its investee companies operate. The investee companies, through their own risk departments, also track these risks and share their findings with the Holding via regular meetings or bilateral discussions. As of 2024, Sabancı Holding has adopted a portfolio-wide approach to assess the financial impacts of both physical and transition climate risks on its portfolio. In this context, an external firm (Moody's) provide technical support for the identification of physical risks such as extreme weather events, wildfires, floods, droughts, and earthquakes, enabling a comprehensive assessment of risks across the portfolio. For transition risks, scenario analyses and carbon price projections are prepared by the Holding and shared with the investee companies; based on these inputs, companies calculate the potential financial impacts and report them back to the Holding. Following the evaluation of all these risks, precautionary decisions are taken at the Holding level, and an action plan is prepared by the EDRC to be submitted for board approval.

Row 2

(2.2.2.1) Environmental issue

Select all that apply

☑ Water

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

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☑ Direct operations

☑ Upstream value chain

☑ End of life management

(2.2.2.4) Coverage

Select from:

☑ Full

(2.2.2.5) Supplier tiers covered

Select all that apply

☑ Tier 1 suppliers

(2.2.2.7) Type of assessment

Select from:

☑ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

☑ More than once a year

(2.2.2.9) Time horizons covered

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(2.2.2.10) Integration of risk management process

Select from:

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

(2.2.2.11) Location-specificity used

Select all that apply

☑ Not location specific

(2.2.2.12) Tools and methods used

Enterprise Risk Management

☑ COSO Enterprise Risk Management Framework

☑ Enterprise Risk Management

☑ ISO 31000 Risk Management Standard

International methodologies and standards

☑ Environmental Impact Assessment

☑ IPCC Climate Change Projections

☑ ISO 14001 Environmental Management Standard

☑ Other international methodologies and standards, please specify :IFRS S2

Databases

☑ Regional government databases

Other

☑ Desk-based research

☑ External consultants

☑ Materiality assessment

☑ Scenario analysis

☑ Other, please specify :Moody’s Climate on Demand Pro

(2.2.2.13) Risk types and criteria considered

Acute physical
☑ Drought

Chronic physical
☑ Declining ecosystem services
☑ Water availability at a basin/catchment level
☑ Water quality at a basin/catchment level

Policy
☑ Changes to international law and bilateral agreements
☑ Changes to national legislation

Market
☑ Inadequate access to water, sanitation, and hygiene services (WASH)

Reputation
☑ Increased partner and stakeholder concern and partner and stakeholder negative feedback

Technology
☑ Transition to water efficient and low water intensity technologies and products

Liability
☑ Non-compliance with regulations

(2.2.2.14) Partners and stakeholders considered

Select all that apply
☑ NGOs
☑ Local communities

☑ Employees
☑ Investors
☑ Suppliers
☑ Regulators

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

Select from:
☑ No

(2.2.2.16) Further details of process

Sabancı Holding and its investee companies use an Enterprise Risk Management (ERM) system that focuses on identifying and evaluating various risks, particularly critical and high-priority ones related to its investee companies. This system continuously tracks performance changes in these risks, providing regular monitoring and reporting. To keep an eye on the risks faced by the Group companies, Key Risk Indicators (KRIs) are set by Sabancı Holding and its subsidiaries. These indicators are consistently monitored and reported on a periodic basis. Risks are prioritized based on their significance and potential impact, and they are managed within predefined tolerance limits aligned with the organization's risk appetite. These limits are established through both modelling studies and qualitative assessments, and they are periodically reviewed by the Risk Management Unit and approved by the EDRC. Tools & methods used / Company specific risk management system and internal methods: The Sustainability Committee of the Holding regularly monitors climate risks across the sectors in which its investee companies operate. The investee companies, through their own risk departments, also track these risks and share their findings with the Holding via regular meetings or bilateral discussions. As of 2024, Sabancı Holding has adopted a portfolio-wide approach to assess the financial impacts of both physical and transition climate risks on its portfolio. In this context, an external firm (Moody's) provide technical support for the identification of physical risks such as extreme weather events, wildfires, floods, droughts, and earthquakes, enabling a comprehensive assessment of risks across the portfolio. For transition risks, scenario analyses and carbon price projections are prepared by the Holding and shared with the investee companies; based on these inputs, companies calculate the potential financial impacts and report them back to the Holding. Following the evaluation of all these risks, precautionary decisions are taken at the Holding level, and an action plan is prepared by the EDRC to be submitted for board approval.
[Add row]

(2.2.4) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts related to your portfolio activities?

	Process in place covering this portfolio	Dependencies and/or impacts related to this portfolio evaluated in this process
Investing (Asset owner)	*Select from:* ☑ Yes	*Select from:* ☑ Both dependencies and impacts

[Fixed row]

(2.2.5) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities related to your portfolio activities?

	Process in place covering this portfolio	Risks and/or opportunities related to this portfolio are evaluated in this process	Is this process informed by the dependencies and/or impacts process?
Investing (Asset owner)	*Select from:* ☑ Yes	*Select from:* ☑ Both risks and opportunities	*Select from:* ☑ Yes

[Fixed row]

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

Investing (Asset owner)

(2.2.6.1) Environmental issue

Select all that apply

☑ Climate change

(2.2.6.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this portfolio

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(2.2.6.3) % of portfolio covered by the assessment process in relation to total portfolio value

100

(2.2.6.4) Type of assessment

Select from:

☑ Qualitative and quantitative

(2.2.6.5) Industry sectors covered by the assessment

Select all that apply

☑ Retail

☑ Services

☑ Materials

☑ Manufacturing

☑ Infrastructure

☑ Power generation

(2.2.6.6) Frequency of assessment

Select from:

☑ More than once a year

(2.2.6.7) Time horizons covered

Select all that apply

☑ Short-term
☑ Medium-term
☑ Long-term

(2.2.6.8) Integration of risk management process

Select from:
☑ Integrated into multi-disciplinary organization-wide risk assessment process

(2.2.6.9) Location-specificity used

Select all that apply
☑ Site-specific

(2.2.6.10) Tools and methods used

Select all that apply
☑ Stress tests
☑ WRI Aqueduct
☑ Scenario analysis
☑ External consultants
☑ Internal tools/methods
☑ Other, please specify **:Moody's Climate on Demand Pro**

(2.2.6.11) Risk type and criteria considered

Acute physical
☑ Drought
☑ Flood (coastal, fluvial, pluvial, ground water)
☑ Wildfires

Chronic physical
☑ Water availability at a basin/catchment level
☑ Water stress

Policy

☑ Changes to international law and bilateral agreements

☑ Changes to national legislation

Market

☑ Availability and/or increased cost of certified sustainable material

☑ Availability and/or increased cost of raw materials

☑ Uncertainty in the market signals

Reputation

☑ Increased partner and stakeholder concern and partner and stakeholder negative feedback

Technology

☑ Transition to lower emissions technology and products

Liability

☑ Non-compliance with regulations

(2.2.6.12) Partners and stakeholders considered

Select all that apply

☑ NGOs

☑ Employees

☑ Investors

☑ Suppliers

☑ Regulators

☑ Local communities

☑ Indigenous peoples

(2.2.6.13) Further details of process

Sabancı Holding and its investee companies use an Enterprise Risk Management (ERM) system that focuses on identifying and evaluating various risks, particularly critical and high-priority ones related to its investee companies. This system continuously tracks performance changes in these risks, providing regular monitoring and reporting. To keep an eye on the risks faced by the Group companies, Key Risk Indicators (KRIs) are set by Sabancı Holding and its subsidiaries. These indicators

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Investing (Asset owner)

(2.2.6.1) Environmental issue

Select all that apply

☑ Water

(2.2.6.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this portfolio

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(2.2.6.3) % of portfolio covered by the assessment process in relation to total portfolio value

100

(2.2.6.4) Type of assessment

Select from:

☑ Qualitative and quantitative

(2.2.6.5) Industry sectors covered by the assessment

Select all that apply

☑ Retail
☑ Services
☑ Materials
☑ Manufacturing
☑ Infrastructure
☑ Power generation
☑ Transportation services

(2.2.6.6) Frequency of assessment

Select from:

☑ Annually

(2.2.6.7) Time horizons covered

Select all that apply

☑ Short-term
☑ Medium-term
☑ Long-term

(2.2.6.8) Integration of risk management process

Select from:

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

(2.2.6.9) Location-specificity used

Select all that apply

☑ Site-specific

(2.2.6.10) Tools and methods used

Select all that apply

☑ Stress tests
☑ WRI Aqueduct
☑ Scenario analysis
☑ External consultants
☑ Internal tools/methods
☑ Other, please specify **:Moody's Climate on Demand Pro**

(2.2.6.11) Risk type and criteria considered

Acute physical
☑ Drought
☑ Flood (coastal, fluvial, pluvial, ground water)

Chronic physical
☑ Water availability at a basin/catchment level
☑ Water stress
☑ Water quality at a basin/catchment level

Policy
☑ Changes to international law and bilateral agreements
☑ Changes to national legislation

Market
☑ Inadequate access to water, sanitation, and hygiene services (WASH)

Reputation
☑ Increased partner and stakeholder concern and partner and stakeholder negative feedback

Technology
☑ Transition to water efficient and low water intensity technologies and products

Liability
☑ Non-compliance with regulations

(2.2.6.12) Partners and stakeholders considered

Select all that apply

☑ NGOs
☑ Employees
☑ Investors
☑ Suppliers
☑ Regulators
☑ Local communities
☑ Indigenous peoples
☑ Water utilities at a local level
☑ Other water users at the basin/catchment level

(2.2.6.13) Further details of process

Sabancı Holding and its investee companies use an Enterprise Risk Management (ERM) system that focuses on identifying and evaluating various risks, particularly critical and high-priority ones related to its investee companies. This system continuously tracks performance changes in these risks, providing regular monitoring and reporting. To keep an eye on the risks faced by the Group companies, Key Risk Indicators (KRIs) are set by Sabancı Holding and its subsidiaries. These indicators are consistently monitored and reported on a periodic basis. Risks are prioritized based on their significance and potential impact, and they are managed within predefined tolerance limits aligned with the organization's risk appetite. These limits are established through both modelling studies and qualitative assessments, and they are periodically reviewed by the Risk Management Unit and approved by the EDRC. Tools & methods used / Company specific risk management system and internal methods: The Sustainability Committee of the Holding regularly monitors climate risks across the sectors in which its investee companies operate. The investee companies, through their own risk departments, also track these risks and share their findings with the Holding via regular meetings or bilateral discussions. As of 2024, Sabancı Holding has adopted a portfolio-wide approach to assess the financial impacts of both physical and transition climate risks on its portfolio. In this context, an external firm (Moody's) provide technical support for the identification of physical risks such as extreme weather events, wildfires, floods, droughts, and earthquakes, enabling a comprehensive assessment of risks across the portfolio. For transition risks, scenario analyses and carbon price projections are prepared by the Holding and shared with the investee companies; based on these inputs, companies calculate the potential financial impacts and report them back to the Holding. Following the evaluation of all these risks, precautionary decisions are taken at the Holding level, and an action plan is prepared by the EDRC to be submitted for board approval.
[Add row]

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

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

Select from:

☑ Yes

(2.2.7.2) Description of how interconnections are assessed

Interconnections between environmental dependencies, impacts, risks, and opportunities are comprehensively assessed for the group-wide analysis. Each risk is evaluated individually, considering potential positive or negative environmental impacts. With conducting double materiality assessments, we significantly enrich our analysis with inside-out & outside-in approach. This methodology allows us to evaluate not only how environmental factors impact our business but also how our business activities impact the environment. By integrating both financial and environmental perspectives, we can identify and manage interconnected risks and opportunities more effectively. Additionally, when making investment decisions, the holding thoroughly reviews the potential positive and negative environmental impacts of each investment. This is done through our Responsible Investment Policy, which mandates a rigorous due diligence process. If the due diligence process does not result in a positive assessment, the investment decision can be cancelled, or existing investments may be divested. This ensures that while the holding seeks to capitalize on opportunities, it also carefully considers the associated risks and potential impacts, maintaining a balanced and sustainable growth trajectory. [Fixed row]

(2.2.8) Does your organization consider environmental information about your clients/investees as part of your due diligence and/or environmental dependencies, impacts, risks and/or opportunities assessment process?

	We consider environmental information
Investing (Asset owner)	*Select from:* ☑ Yes

[Fixed row]

(2.2.9) Indicate the environmental information your organization considers about clients/investees as part of your due diligence and/or environmental dependencies, impacts, risks and/or opportunities assessment process, and how this influences decision-making.

Investing (Asset owner)

(2.2.9.1) Environmental issues covered

Select all that apply

☑ Climate change

☑ Water

(2.2.9.2) Type of environmental information considered

Select all that apply

☑ CDP scores
☑ Emissions data
☑ TCFD disclosures
☑ Energy usage data
☑ Climate transition plans
☑ Scope and content of water policy
☑ Breaches to local water regulations
☑ Water withdrawn from water stressed areas
☑ Water withdrawal and/or consumption volumes
☑ CDP questionnaire response
☑ Emissions reduction targets
☑ Science-Based Net-Zero Targets
☑ Water discharge treatment data
☑ Access to WASH in the workplace
☑ Other, please specify **:Contribution of business/technology to climate mitigation/ adaptation, IFRS S2**

(2.2.9.3) Process through which information is obtained

Select all that apply

☑ Directly from the client/investee
☑ From an intermediary or business partner
☑ Public data sources

(2.2.9.4) Industry sectors covered by due diligence and/or risk assessment process

Select all that apply

☑ Retail
☑ Services
☑ Materials
☑ Manufacturing
☑ Infrastructure
☑ Power generation

(2.2.9.5) % of portfolio covered by the process in relation to total portfolio value

100

(2.2.9.6) Total portfolio value covered by the process

3073578933000
[Add row]

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

Risks

(2.4.1) Type of definition

Select all that apply
☑ Qualitative
☑ Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:
☑ Revenue

(2.4.3) Change to indicator

Select from:
☑ % decrease

(2.4.4) % change to indicator

Select from:
☑ Less than 1%

(2.4.6) Metrics considered in definition

Select all that apply

☑ Frequency of effect occurring

☑ Likelihood of effect occurring

(2.4.7) Application of definition

For the financial impacts of sustainability-related risks and opportunities to be considered "material" under TSRS, such impacts must be of a nature that can reasonably affect the organization's financial position, performance, and cash flows. In this context, Sabancı Holding's financial materiality assessment is based on 0.8% of consolidated total revenues. All risks and opportunities that have a high likelihood of occurrence and can generate a financial impact above this threshold are considered financially material and are reflected in the relevant disclosures accordingly. However, even if certain factors remain below the threshold in the short term, they are also subject to qualitative assessment and disclosed if they carry the potential to exceed the 0.8% threshold in the medium and long term.

Opportunities

(2.4.1) Type of definition

Select all that apply

☑ Qualitative

☑ Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:

☑ Revenue

(2.4.3) Change to indicator

Select from:

☑ % increase

(2.4.4) % change to indicator

Select from:

☑ Less than 1%

(2.4.6) Metrics considered in definition

Select all that apply

☑ Frequency of effect occurring

☑ Likelihood of effect occurring

(2.4.7) Application of definition

For the financial impacts of sustainability-related risks and opportunities to be considered "material" under TSRS, such impacts must be of a nature that can reasonably affect the organization's financial position, performance, and cash flows. In this context, Sabancı Holding's financial materiality assessment is based on 0.8% of consolidated total revenues. All risks and opportunities that have a high likelihood of occurrence and can generate a financial impact above this threshold are considered financially material and are reflected in the relevant disclosures accordingly. However, even if certain factors remain below the threshold in the short term, they are also subject to qualitative assessment and disclosed if they carry the potential to exceed the 0.8% threshold in the medium and long term.
[Add row]

C3. Disclosure of risks and opportunities

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

Climate change

(3.1.1) Environmental risks identified

Select from:

☑ Yes, both within our direct operations or upstream value chain, and within our portfolio

Water

(3.1.1) Environmental risks identified

Select from:

☑ Yes, both within our direct operations or upstream value chain, and within our portfolio

Plastics

(3.1.1) Environmental risks identified

Select from:

☑ No

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

Select from:

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

(3.1.3) Please explain

Our double materiality assessment process, which evaluates both the environmental impact of our operations and the potential environmental risks to our business, is essential for identifying key risks. Through this comprehensive evaluation, we have concluded that plastic-related risks are not among the most critical environmental concerns for Sabancı Holding. Given the diverse range of industries within our portfolio, plastic usage does not represent a significant risk to our business operations. This assessment ensures that we prioritize and address the most pressing environmental challenges relevant to our operations.
[Fixed row]

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

Climate change

(3.1.1.1) Risk identifier

Select from:
☑ Risk1

(3.1.1.3) Risk types and primary environmental risk driver

Acute physical
☑ Other acute physical risk, please specify :Extreme Weather Events (flood, storm, extreme heat etc.)

(3.1.1.4) Value chain stage where the risk occurs

Select from:
☑ Investing (Asset owner) portfolio

(3.1.1.5) Risk type mapped to traditional financial services industry risk classification

Select all that apply
☑ Funding risk
☑ Market risk

☑ Insurance risk
☑ Policy and legal risk
☑ Operational risk

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ Spain
☑ Brazil
☑ Turkey
☑ Ireland
☑ Thailand
☑ Indonesia
☑ United States of America

(3.1.1.9) Organization-specific description of risk

The increase in the frequency and intensity of extreme weather events (such as floods, storms, and heatwaves) due to climate change amplifies physical climate risks. This situation brings acute risk factors that may cause operational disruptions in infrastructure and processes sensitive to environmental conditions. This risk type, expected to be effective in the short and medium term, refers to sudden and high-impact events. To assess the portfolio's vulnerability to physical risks, we focused on the following companies whose manufacturing assets could potentially be impacted: Çimsa, Akçansa, Kordsa, Enerjisa Üretim,Temsa, and Brisa. Only the physical impacts on directly owned assets were considered; financial companies and their portfolios were excluded from the analysis. The numerator represents the total revenues of the listed companies, while the denominator corresponds to the combined revenues of Sabancı Holding.When determining the percentage of the portfolio that is susceptible to risks, we take into account the total revenues of the company, since it is not possible to accurately quantify the exact percentage of revenues that may be impacted. Please note that the 5-year horizon risk amount is calculated by multiplying the estimated annual financial loss by the number of years. This calculation is based on the current asset value and does not account for any potential appreciation over time. For consistency, we have used 2024 foreign exchange rates in the calculation.

(3.1.1.10) % of portfolio value vulnerable to this risk

Select from:

☑ 11-20%

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Reduced profitability of investment portfolios

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

Select all that apply

☑ Short-term

☑ Medium-term

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

Select from:

☑ Likely

(3.1.1.14) Magnitude

Select from:

☑ High

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

The increasing frequency and intensity of extreme weather events such as heatwaves, floods, and storms may create operational risks across various sectors in Sabancı Holding's portfolio. Extreme weather can negatively affect financial performance by causing operational disruptions, higher costs, and reduced asset efficiency. For example, in electricity distribution activities, extreme weather may lead to service interruptions, an increase in failure rates, and longer response times. This can result in customer dissatisfaction, revenue losses, and potential penalties imposed by regulators. In addition, rising maintenance and repair costs can increase operating expenses and put pressure on operational profitability. Investments required to strengthen grid infrastructure against extreme climate events may raise capital needs and impact cash flow planning. In Group companies such as Çimsa, Akçansa, Kordsa, Temsa, and Brisa, extreme heat can reduce machine performance, disrupt raw material flows, and cause productivity losses and unplanned stoppages. These impacts may increase unit production costs, disrupt delivery commitments, and reduce cash flow from operations. Furthermore, logistical and supply chain disruptions caused by damaged transportation infrastructure or weather-related delays can affect the timely delivery of products and materials across the Group. This may increase transport and storage costs, lead to lost sales opportunities, and cause inefficient allocation of working capital. Overall, extreme weather events may put pressure on short- and medium-term cash flows by driving up operational expenses, requiring additional capital investments for climate adaptation, and creating volatility in revenue streams.

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

Select from:

☑ Yes

(3.1.1.19) Anticipated financial effect figure in the short-term – minimum (currency)

0

(3.1.1.20) Anticipated financial effect figure in the short-term – maximum (currency)

37811174

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

0

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

189055868

(3.1.1.25) Explanation of financial effect figure

Sabancı Holding uses Moody's Climate on Demand Pro tool to assess physical risks related to climate change. This modeling method analyzes the current and future exposure of facilities to risks such as sea level rise, hurricanes & typhoons, heat stress, floods and wildfires. During the calculation process, international climate projections are applied to estimate the frequency and intensity of expected events at a given location; these estimates are supported by statistical analyses and regional climate scenarios. Considering the sectoral characteristics of the asset and its adaptive capacity, both qualitative and quantitative assessments of the financial impacts of such events are conducted. The anticipated maximum financial impacts in the short and medium term were determined by analyzing various physical risks under the RCP 8.5 worst-case scenario for the year 2030. However, on March 3, 2025, flooding at Kordsa's Indonesia facility caused damage to certain inventories and PPE. Preliminary assessments indicate that inventories of USD 5.6 million (2.6% of Kordsa's consolidated inventories) and PPE of USD 21.4 million (6.6% of Kordsa's consolidated PPE) were affected. The insurance coverage for property damage and business interruption, including up to 12 months of loss, provides protection of up to USD 50 million. In the context of climate-related physical risk assessment, methodologies are generally based on Annual Average Damage, which reflects probabilistic assumptions regarding the frequency and intensity of potential climate events. Accordingly, some variance may be observed between modeled expected financial impacts and actual realized outcomes. Annual Average Damage provides a sound basis for evaluating the cumulative effect of such risks over time and for informing financial materiality assessments. In addition, insurance arrangements are designed with reference to maximum loss exposure, ensuring that potential adverse impacts are appropriately mitigated within the established risk transfer framework. The anticipated financial effects for the short and medium terms were calculated in USD, and subsequently converted into TRY using the annual average exchange rate of USD/TRY 32.79. The reported figures represent the original USD values, with the short-term impact estimated at USD 1,156,305 and the medium-term impact at USD 5,781,525.

(3.1.1.26) Primary response to risk

Policies and plans

☑ Develop a climate transition plan

(3.1.1.27) Cost of response to risk

4819038246

(3.1.1.28) Explanation of cost calculation

Environmental investments and expenditures are calculated in the reporting year by consolidating CAPEX and OPEX related to environmental activities, in line with the DNSH criteria. This calculation has been subject to independent assurance and is disclosed in the 2024 Report. Within environmental investments, transition investments such as renewable energy projects, growth-oriented investments, and other initiatives supporting the transition to a low-carbon economy are included and reported under these breakdowns.

(3.1.1.29) Description of response

Sabancı Holding adopts a comprehensive approach across the Group to manage physical climate risks such as extreme weather events. Detailed physical risk assessments focusing on operational continuity and employee safety are conducted in all Group companies. These efforts are supported by disaster preparedness plans tailored to location-specific climate threats. Based on the findings, business continuity plans are updated, and investments are made in more resilient infrastructure, particularly in energy and industrial operations. In this context, data collection, climate modeling, and scenario analyses are also developed and implemented to strengthen long-term resilience. Supply chains and raw material inputs are evaluated by relevant teams to identify climate-sensitive dependencies. To ensure resilience against extreme weather, logistics processes are reviewed, and additional maintenance and capital investment plans are prepared. In new asset acquisition processes, climate risk is considered a standard due diligence criterion; operations in high-risk locations, such as flood-prone areas or coastal zones, are reassessed for compliance and resilience. All these measures aim to reinforce business continuity, reduce long-term risk exposure, and safeguard value creation across Sabancı Holding.

Water

(3.1.1.1) Risk identifier

Select from:

☑ Risk1

(3.1.1.3) Risk types and primary environmental risk driver

Acute physical

☑ Other acute physical risk, please specify :Extreme Weather Events – water stress

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Investing (Asset owner) portfolio

(3.1.1.5) Risk type mapped to traditional financial services industry risk classification

Select all that apply

☑ Market risk

☑ Policy and legal risk

☑ Systemic risk

☑ Operational risk

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ Spain

☑ Turkey

☑ Ireland

☑ Thailand

☑ Indonesia

☑ United States of America

(3.1.1.7) River basin where the risk occurs

Select all that apply

☑ Mississippi River

☑ Sakarya

☑ Other, please specify :Akarçay Basin, Marmara Basin, South East Coast Spain, Erne Basin, Cisadane Basin, Noi Basin

(3.1.1.9) Organization-specific description of risk

Long-term droughts and the reduction of freshwater resources pose material risks for water-dependent sectors within Sabancı Holding's portfolio, particularly in cement production, energy generation, and tire manufacturing, where water is critical for operational continuity and efficiency. When determining the percentage of the portfolio that is susceptible to risks, we take into account the total revenues of the company, since it is not possible to accurately quantify the exact percentage of revenues that may be impacted Please note that the 5-year horizon risk amount is calculated by multiplying the estimated annual financial loss by the number of years. This calculation is based on the current asset value and does not account for any potential appreciation over time. For consistency, we have used 2024 foreign exchange rates in the calculation.

(3.1.1.10) % of portfolio value vulnerable to this risk

Select from:

☑ 21-30%

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Reduced profitability of investment portfolios

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

Select all that apply

☑ Medium-term

☑ Long-term

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

Select from:

☑ More likely than not

(3.1.1.14) Magnitude

Select from:

☑ High

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

Physical risks such as water stress are becoming increasingly material, particularly in water-intensive sectors such as energy generation and material technologies. These risks may cause disruptions in core operations, higher production costs, and the need for additional capital expenditures, thereby negatively impacting the Group's financial performance and cash flow. In the geographies where Sabancı Group companies operate, especially Türkiye's Mediterranean region, parts of Europe, and the United States, prolonged droughts and the reduction of freshwater resources could constrain existing operations and limit future growth plans. For energy and cement companies, reduced water availability may undermine critical processes such as cooling in thermal power plants, dust suppression in cement plants, and hydroelectric generation, leading to efficiency losses and lower output. Hydroelectric capacity is particularly dependent on hydrological conditions. Water stress driven by drought, irregular rainfall, and changes in riverbeds can reduce electricity generation, resulting in revenue fluctuations. In addition, excessive water flow requiring spillway discharges and sediment-related risks may further reduce output and increase maintenance needs, thereby eroding operational efficiency. These uncertainties can also generate imbalance costs in day-ahead electricity markets, where production levels are forecast in advance. Despite various mitigation measures, unexpected meteorological conditions may still cause deviations in generation forecasts, creating volatility in financial performance and cash flows. In material technologies, water plays a significant role in maintaining product quality and supporting essential production processes. Restrictions on water use or supply interruptions could result in production delays, quality losses, and extended downtime, thereby raising unit costs and adversely affecting delivery performance. Furthermore, tighter regulations on water use may necessitate costly asset restructuring or additional investments in water-efficiency technologies, potentially influencing capital allocation and long-term cash flow planning.

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

Select from:

☑ Yes

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

0

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

244553299

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

0

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

502655390

(3.1.1.25) Explanation of financial effect figure

Sabancı Holding utilizes Moody's Climate on Demand Pro tool to assess physical risks related to climate change. This modeling methodology analyzes both the current and future exposure of facilities to risks such as heavy rainfall, flooding, storms, extreme temperatures, drought, sea level rise, and wildfires. Using international climate projections, it estimates the frequency and severity of events expected at a given location, supported by statistical analyses and regional climate scenarios. Taking into account the sectoral characteristics and adaptive capacity of each asset, the methodology provides both qualitative and quantitative assessments of the potential financial impacts of such events. The anticipated financial effects for the medium and long-terms were calculated in USD, and subsequently converted into TRY using the annual average exchange rate of USD/TRY 32.79. The reported figures represent the original USD values, with the medium-term impact estimated at USD 7,478,694 and the long-term impact at USD 15,371,724.

(3.1.1.26) Primary response to risk

Infrastructure, technology and spending

☑ Increase investment in R&D

(3.1.1.27) Cost of response to risk

4819038246

(3.1.1.28) Explanation of cost calculation

Environmental investments and expenditures are calculated in the reporting year by consolidating CAPEX and OPEX related to environmental activities, in line with the DNSH (Do No Significant Harm) criteria. This calculation has been subject to independent assurance and is disclosed in the 2024 report.

(3.1.1.29) Description of response

Sabancı Holding adopts a comprehensive approach across the Group to manage physical climate risks such as water stress due to extreme weather events. Detailed physical risk assessments focusing on operational continuity and employee safety are conducted in all Group companies. These efforts are supported by disaster preparedness plans tailored to location-specific climate threats. Based on the findings, business continuity plans are updated, and investments are made in more resilient infrastructure, particularly in energy and industrial operations. In this context, data collection, climate modeling, and scenario analyses are also developed and implemented to strengthen long-term resilience. Supply chains and raw material inputs are evaluated by relevant teams to identify climate-sensitive dependencies. To ensure resilience against extreme weather, logistics processes are reviewed, and additional maintenance and capital investment plans are prepared. In new asset acquisition processes, climate risk is considered a standard due diligence criterion; operations in high-risk locations, such as flood-prone

areas or coastal zones, are reassessed for compliance and resilience. All these measures aim to reinforce business continuity, reduce long-term risk exposure, and safeguard value creation across Sabancı Holding.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk2

(3.1.1.3) Risk types and primary environmental risk driver

Policy

☑ Carbon pricing mechanisms

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Investing (Asset owner) portfolio

(3.1.1.5) Risk type mapped to traditional financial services industry risk classification

Select all that apply

☑ Market risk

☑ Reputational risk

☑ Policy and legal risk

☑ Systemic risk

☑ Operational risk

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ Turkey

(3.1.1.9) Organization-specific description of risk

In line with the 2053 net zero target, Türkiye continues its efforts to develop a national Emissions Trading System (ETS), where regulatory requirements are expected to increase, particularly for carbon-intensive sectors. At the same time, the phased implementation of the European Union's Carbon Border Adjustment Mechanism (CBAM) brings initial reporting obligations, followed by financial liabilities and additional compliance requirements for companies exporting to the EU. In this evolving environment, Group companies operating in regions where ETS mechanisms are already in place (such as the EU ETS) may face rising carbon pricing risks and stricter reporting standards. These developments create a transition risk, leading to higher operational costs, potential shifts in export market dynamics, and a continuous need for investment in low-carbon technologies, efficiency measures, and robust reporting capabilities.

(3.1.1.10) % of portfolio value vulnerable to this risk

Select from:

☑ 1-10%

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased compliance costs

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

Select all that apply

☑ Medium-term

☑ Long-term

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

Select from:

☑ Likely

(3.1.1.14) Magnitude

Select from:

☑ Medium

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

The gradual implementation of carbon pricing mechanisms in both domestic and international markets may moderately increase Sabancı Holding's operating expenses, particularly in certain carbon-intensive business areas. The progressive internalization of carbon costs through ETSs and the EU CBAM could put pressure on profit margins, especially in areas where abatement options are limited in the short term. Although carbon pricing may affect cost structures and competitiveness in certain sectors, the diversified portfolio of Sabancı Holding, its operational efficiency-oriented approach, and ongoing investments in low-carbon technologies are expected to limit the overall financial impact. From a cash flow perspective, compliance obligations and capital investments for carbon reduction may create some short- to medium-term pressure; however, this is not expected to significantly affect the Group's financial strength. Strategic alignment with evolving regulations is anticipated to enhance long-term resilience and facilitate access to sustainable financing opportunities.

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

Select from:

☑ Yes

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

0

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

203642100

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

0

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

203642100

(3.1.1.25) Explanation of financial effect figure

The carbon price projections used to assess the financial impacts of emission-based risks and opportunities were developed by considering a comparative analysis of Türkiye's ETS with international ETS mechanisms and sector-specific transition risks. Similar to international practices, carbon prices in the initial years of the TR ETS

are expected to remain low and stable. In terms of allocation methods, as seen internationally, free allowances are projected to be distributed to the energy sector only for a limited period after the ETS is launched, given the sector's significant share in the national emissions profile. At the same time, sectors with limited substitution options, such as energy and cement, are considered to have a higher resilience in managing carbon cost impacts on product pricing. Consultations with stakeholders indicated an expected 10-year free allocation period to help maintain industrial competitiveness, with benchmarks set against the most efficient 50% of each sector. Based on these assumptions, the carbon price curve serves as a tool to analyze the financial impacts of transition risks and as a reference point in investment decisions. When evaluating the long-term financial impacts of carbon pricing risks, several uncertainties must be considered including future regulations, carbon price developments, the speed of technological change, and market dynamics. Due to these uncertainties, it is difficult to make reliable long-term financial projections. However, since the Group is expected to become more resilient over time through ongoing technological progress, investments, and transition strategies, the long-term impact is assumed to be the same as the medium-term impact for the purpose of this assessment. The anticipated financial effects for medium and long-terms were calculated in EUR and subsequently converted into TRY using the exchange rate of EUR/TRY 64.8. The reported figures represent the original EUR values, with both medium-term and long-term impact estimated at EUR 3,142,625.

(3.1.1.26) Primary response to risk

Policies and plans

☑ Develop a climate transition plan

(3.1.1.27) Cost of response to risk

595812652

(3.1.1.28) Explanation of cost calculation

Environmental expenditures are calculated for the reporting year by consolidating all environmental activities, including both legal and beyond legal expenditures. This calculation has been independently assured and disclosed in the 2024 Report.

(3.1.1.29) Description of response

To mitigate transition risks arising from emerging carbon pricing mechanisms such as the national ETS and the EU CBAM, Sabancı Holding has taken proactive and structured measures across its portfolio. Scenario analyses have been conducted in all Group companies currently subject to or potentially falling under these regulations, in order to assess financial and operational impacts under different carbon pricing scenarios. These assessments are integrated into strategic planning and support decision-making regarding carbon reduction plans. Many Group companies have set emission reduction targets aligned with international frameworks and positioned investments in low-carbon technologies and energy efficiency as priority elements of their core business strategies. This proactive approach has enabled Sabancı Holding to establish a strong foundation for preparedness against regulatory requirements, manage potential cost impacts, and maintain competitiveness in markets with strict climate policies. The Group also continues to strengthen its carbon data infrastructure and reporting capabilities to ensure compliance with reporting requirements emerging under national and international carbon pricing regulations.
[Add row]

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

Climate change

(3.1.2.1) Financial metric

Select from:

☑ Revenue

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

407284200

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

Select from:

☑ Less than 1%

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

226866042

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

Select from:

☑ Less than 1%

(3.1.2.7) Explanation of financial figures

Sabancı Group has not experienced any financial impact due to transition or physical risks during the reporting year. The financial figures provided represent the estimated financial effects of the risks we anticipate. For climate change transition risks, the potential financial impact on companies subject to ETS could reach up to TRY 407,284,200 in the medium to long term. On the other hand, if a physical risk such as extreme weather events occurs, we expect a financial impact of TRY 226,866,042 in the short to medium term. Both of these figures are well below 1% of our revenue.

Water

(3.1.2.1) Financial metric

Select from:

☑ Revenue

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

747208689

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

Select from:

☑ Less than 1%

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

0

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

Select from:

☑ Less than 1%

(3.1.2.7) Explanation of financial figures

Sabancı Group has not experienced any financial impact due to transition or physical risks during the reporting year. The financial figures provided represent the estimated financial effects of the risk we anticipate. The potential financial impact of our physical risk related to water is estimated to be 747,208,689 TRY in the short to medium term. There were no transitional water risks either observed during the reporting year or expected to occur in the short, medium, or long term.
[Add row]

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

	Environmental opportunities identified
Climate change	*Select from:* ☑ Yes, we have identified opportunities, and some/all are being realized
Water	*Select from:* ☑ Yes, we have identified opportunities, and some/all are being realized

[Fixed row]

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

Climate change

(3.6.1.1) Opportunity identifier

Select from:
☑ Opp1

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Markets

☑ Expansion into new markets

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Investing (Asset owner) portfolio

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ Turkey

(3.6.1.8) Organization specific description

Founded in 2022, Sabancı İklim Teknolojileri A.Ş. (Sabancı Climate Technologies) is wholly and directly owned by Sabancı Holding. The company focuses on renewable energy investments and strategic investments in venture capital funds and start-ups, particularly in the USA and Europe. In line with these goals, Sabancı İklim Teknolojileri A.Ş. established a subsidiary, Sabancı Renewables Inc., which was founded by and is fully owned by Sabancı İklim Teknolojileri A.Ş., making Sabancı Holding the indirect owner. As of the end of 2024, the total installed capacity of Sabancı Climate Technologies Inc. reached 504 MW. The company's two large solar energy investments in the U.S., the Cutlass II and Oriana Solar projects, have annual revenue estimates calculated based on Power Purchase Agreements (PPAs).

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Increased revenues through access to new and emerging markets

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

Select all that apply

☑ Long-term

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

Select from:

☑ Virtually certain (99–100%)

(3.6.1.12) Magnitude

Select from:

☑ Medium-high

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

Established in 2022 as a wholly-owned subsidiary of Sabancı Holding, Sabancı İklim Teknolojileri A.Ş. focuses on renewable energy investments as well as strategic investments in venture capital funds and start-ups, particularly in the United States and Europe. To carry out renewable power plant investments, the company established Sabancı Renewables Inc., a wholly-owned subsidiary, through which Sabancı Holding indirectly owns these assets. By the end of 2024, Sabancı İklim Teknolojileri A.Ş. reached a total installed capacity of 504 MW. The company's two major solar power projects in the United States, Cutlass II and Oriana Solar, have projected annual revenues based on long-term Power Purchase Agreements (PPAs). For the 272 MW Cutlass II Solar Power Plant, it is assumed that 70% of the total generation will be sold at a fixed price under a 10-year PPA, while the remaining 30% will be sold at market prices. For the 232 MW Oriana Solar Power Plant, under a 15-year PPA, 80% of the generation will be sold at a fixed price and 20% at market prices. Based on these assumptions, the fixed-price and variable revenue components were separated, and the total annual revenue was calculated at USD 43.3 million. This corresponds to approximately TL 1.42 billion, using the 2024 average exchange rate of 32.79 TL/USD.

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

Select from:

☑ Yes

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

0

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

1420000000

(3.6.1.23) Explanation of financial effect figures

Established in 2022 as a wholly owned subsidiary of Sabancı Holding, Sabancı Climate Technologies Inc. focuses on renewable energy investments as well as strategic investments in venture capital funds and start-ups, particularly in the U.S. and Europe. To carry out renewable power plant investments, Sabancı Renewables Inc., a 100% subsidiary of Sabancı Climate Technologies Inc., was founded. Accordingly, Sabancı Holding is the indirect owner of these investments. As of the end of 2024, the total installed capacity of Sabancı Climate Technologies Inc. reached 504 MW. The company's two large solar energy investments in the U.S., the Cutlass II and Oriana Solar projects, have annual revenue estimates calculated based on Power Purchase Agreements (PPAs). In calculating the financial impact, for the Cutlass II Solar Power Plant with an installed capacity of 272 MW, it was assumed that under a 10-year PPA, 70% of total production would be sold at a fixed price, while the remaining 30% would be sold at market prices. For the Oriana Solar Power Plant with an installed capacity of 232 MW, under a 15-year PPA, 80% of production would be sold at a fixed price and 20% at market prices. Fixed-price sales ratios, contract terms, and market pricing for the remaining output were used to separate fixed and variable revenue components. Based on these assumptions, the total annual revenue estimate was calculated at USD 43.3 million. Using the 2024 average USD exchange rate of 32.79 TL, this corresponds to approximately TL 1.42 billion.

(3.6.1.24) Cost to realize opportunity

19346100000

(3.6.1.25) Explanation of cost calculation

The calculation considers an average maximum unit cost of USD 1.25 million per MW for Cutlass Solar II and USD 1.1 million per MW for Oriana Solar. To determine the total cost, including CAPEX and OPEX during construction, the unit costs are multiplied by the installed capacities of 272 MW (Cutlass Solar II) and 232 MW (Oriana Solar). This results in costs of USD 340 million for Cutlass Solar II and USD 250 million for Oriana Solar. The combined figure is then converted to TL using the 2024 average USD exchange rate (32.79 TL/USD), amounting to TL 19.46 billion.

(3.6.1.26) Strategy to realize opportunity

Sabancı Holding closely monitors changing market dynamics shaped by climate policies, customer preferences, and technological developments, and evaluates selective growth opportunities in sectors aligned with the low-carbon transition. In this context, while Sabancı Climate Technologies Inc. continues to scale up its activities in the U.S. clean energy market, in Türkiye, Enerjisa Üretim aims to reach an installed capacity of 1,000 MW under the YEKA II projects by the first quarter of 2026. This opportunity-driven approach deepens Sabancı Group's participation in emerging low-carbon value chains and strengthens its positioning for future growth.

Water

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp1

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Resource efficiency

☑ Cost savings

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Investing (Asset owner) portfolio

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ Turkey

(3.6.1.6) River basin where the opportunity occurs

Select all that apply

☑ Other, please specify :Akarçay Basin, Marmara Basin

(3.6.1.8) Organization specific description

Sabancı Holding has set a water-related target to reduce water consumption by 15% by 2030, using 2022 as the base year. By lowering overall water consumption across the Group, the target is expected to reduce total water costs, as the same unit water price will apply to a smaller volume of use. This contributes directly to cost savings while promoting more sustainable water use in operations.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Reduced direct costs

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

Select all that apply

☑ Medium-term

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

Select from:

☑ Virtually certain (99–100%)

(3.6.1.12) Magnitude

Select from:

☑ Medium

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

Sabancı Holding has set a water-related target to reduce water consumption by 15% by 2030, using 2022 as the base year. By lowering overall water consumption across the Group, the target is expected to reduce total water costs, as the same unit water price will apply to a smaller volume of use. This contributes directly to cost savings while promoting more sustainable water use in operations.

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

Select from:

☑ Yes

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

0

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

26678697

(3.6.1.23) Explanation of financial effect figures

*Sabancı Holding has set a water-related target of reducing water consumption by 15% by 2030, using 2022 as the base year. In line with this target, water consumption is planned to decrease to 7,164,895 m³ by 2030, generating savings that provide a financial advantage through reduced water costs. Currently, the unit price of well water is 21.1 TRY/m³, and the cost savings have been estimated based on this rate. Total cost savings= 21.1 TRY/m3 * 1,263,383 m3= 26,678,697 TRY*

(3.6.1.24) Cost to realize opportunity

595812652

(3.6.1.25) Explanation of cost calculation

Environmental expenditures are calculated for the reporting year by consolidating all environmental activities, including both legal and beyond legal expenditures. This calculation has been independently assured and disclosed in the 2024 Report.

(3.6.1.26) Strategy to realize opportunity

To mitigate water-related risks and strengthen long-term resilience, Sabancı Holding completed a comprehensive water management project in 2024, establishing Group-wide definitions, methodologies, and performance indicators for water metrics. This initiative enabled the Group to set a medium-term water reduction target and to update baseline data in line with operational boundaries and methodologies. Water-related physical risks are systematically integrated into the Group's corporate risk management and investment processes. Strategic planning incorporates future water stress scenarios, supported by scenario-based climate modeling to assess geographic exposure. Investments prioritize technologies that reduce freshwater withdrawal and enhance process efficiency. Across many Group companies, closed-loop water systems, rainwater harvesting, and advanced filtration technologies have been introduced. In water-intensive operations, measurable water intensity reduction targets have been set. The Holding also promotes a culture of water responsibility across its value chain and expands quantitative assessments of water-related risks, starting with the energy and material technologies sectors. These efforts demonstrate that the Group's approach to water management goes beyond business continuity, positioning water as both a critical component of natural capital and a strategic priority for sustainable growth.
[Add row]

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

Climate change

(3.6.2.1) Financial metric

Select from:
☑ Revenue

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

1420000000

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

Select from:

☑ Less than 1%

(3.6.2.4) Explanation of financial figures

Sabancı Group has not experienced any substantive financial effects due to environmental opportunities during the reporting year. The financial figures provided represent the estimated financial effects of the opportunities we anticipate. For the climate change opportunity, the potential financial effect on the group, subject to expansion into new markets, could reach up to TRY 1,420,000,000 in the long term. That figure is well below 1% of our revenue.

Water

(3.6.2.1) Financial metric

Select from:

☑ Revenue

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

26678697

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

Select from:

☑ Less than 1%

(3.6.2.4) Explanation of financial figures

Sabancı Group has not experienced any substantive financial effects due to environmental opportunities during the reporting year. The financial figures provided represent the estimated financial effects of the opportunities we anticipate. For the water opportunity, the potential financial effect on the group, subject to cost savings, could reach up to TRY 26,678,697 in the medium term. That figure is well below 1% of our revenue.
[Add row]

C4. Governance

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

(4.1.1) Board of directors or equivalent governing body

Select from:

☑ Yes

(4.1.2) Frequency with which the board or equivalent meets

Select from:

☑ More frequently than quarterly

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

Select all that apply

☑ Executive directors or equivalent

☑ Non-executive directors or equivalent

☑ Independent non-executive directors or equivalent

(4.1.4) Board diversity and inclusion policy

Select from:

☑ Yes, and it is publicly available

(4.1.5) Briefly describe what the policy covers

Diversity Policy for the Board of Directors has been adopted to ensure professionals with different backgrounds, knowledge, experience and qualifications are appointed to the Board of Directors of Sabancı Holding by encouraging diversity and inclusiveness in the nomination process of Board members, with the ultimate purpose of serving to create a more effective structure of Board of Directors and thereby increase the Company's performance. Sabancı Holding prioritizes diversity and inclusion within its Board of Directors, aiming to have at least 30% female members. Candidates are selected based on the Company's culture, investment areas, business lines, financial size, and strategic goals, ensuring they possess the necessary expertise and competence. Sabancı Group acknowledges that promoting

diversity and inclusion at all levels of management and employment, particularly the Board of Directors, will enhance Company performance. The nomination process for Sabancı Holding's Board of Directors is carried out in accordance with the Turkish Commercial Code, the Capital Markets Law and other relevant regulations, particularly the provisions set forth in the Company's Articles of Association. More information can be found from both policy document attached to this question and at: https://yatirimciiliskileri.sabanci.com/en/sustainability/detail/Diversity-Policy-For-The-Board-Of-Directors/602/2880/0

(4.1.6) Attach the policy (optional)

Diversity Policy For The Board Of Directors.pdf
[Fixed row]

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

	Board-level oversight of this environmental issue
Climate change	*Select from:* ☑ Yes
Water	*Select from:* ☑ Yes
Biodiversity	*Select from:* ☑ Yes

[Fixed row]

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

Climate change

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

Select all that apply

☑ Board-level committee

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

Select from:

☑ Yes

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

Select all that apply

☑ Board Terms of Reference

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

Select from:

☑ Scheduled agenda item in every board meeting (standing agenda item)

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

Select all that apply

☑ Overseeing and guiding scenario analysis

☑ Overseeing the setting of corporate targets

☑ Monitoring progress towards corporate targets

☑ Approving corporate policies and/or commitments

☑ Overseeing and guiding public policy engagement

☑ Monitoring the implementation of a climate transition plan

☑ Overseeing and guiding the development of a business strategy

☑ Overseeing and guiding acquisitions, mergers, and divestitures

☑ Monitoring compliance with corporate policies and/or commitments

☑ Overseeing and guiding the development of a climate transition plan

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

☑ Reviewing and guiding innovation/R&D priorities

☑ Approving and/or overseeing employee incentives

☑ Overseeing and guiding major capital expenditures

☑ Monitoring the implementation of the business strategy

☑ Overseeing reporting, audit, and verification processes

(4.1.2.6) Scope of board-level oversight

Select all that apply

☑ Risks and opportunities to our own operations

☑ Risks and opportunities to our investment activities

☑ The impact of our own operations on the environment

☑ The impact of our investing activities on the environment

(4.1.2.7) Please explain

The Board Sustainability Committee plays a key role, to help Board of Directors by keeping track of local and international sustainability developments and advising the Executive Committee. It focuses on transparency, sustainability reporting, formulation of policies, and addressing ESG issues, ensuring stakeholder expectations are met. The Committee includes a Rapporteur and up to three Board Members, including the Chair, all appointed by the Board of Directors. The Chair of the Committee is chosen from the independent Board Members. The Committee meets at least twice a year and held 2 meetings in 2024. Working with the Sabancı Holding Human Capital and Sustainability Group Presidency, the Board Sustainability Committee oversees sustainability matters brought up by the Sustainability Leadership Committee or directly by the Sustainability Directorate. The Committee addresses issues related to the Holding's sustainability governance structure and developments in climate emergency. This includes discussions on IPCC reports, Science Based Targets initiative (SBTi) targets, greenhouse gas (GHG) emissions performance, progress on the Carbon Border Adjustment Mechanism (CBAM), and relevant EU environmental directives. In 2023, the committee approved interim GHG reduction targets consistent with the Paris Agreement. These targets include a 42% reduction by 2030 and a 15% reduction by 2025, compared to the 2021 baseline, supporting the Holding's long-term commitment to achieve net-zero emissions by 2050 in line with science-based recommendations. Building on this, in 2024 Sabancı Holding expanded its perspective from climate to nature and announced its water-related targets, aiming to achieve a 15% reduction in water consumption and a 10% reduction in water withdrawal by 2030. Additionally, The Committee oversights climate and water figures for Holding and Group companies. Granular analysis of this data has been conducted to gain deeper understanding of the Holding's climate and water performances, across sectors and individual companies. In addition, the Board of Directors is the ultimate body accountable for implementing Turkish Sustainability Reporting Standards (TSRS) climate-related disclosure requirements across Sabancı Group. TSRS, published by e Public Oversight, Accounting, and Auditing Standards Authority (KGK) as the national sustainability reporting standard, is a direct adoption of the IFRS S1 General Requirements for Disclosure of Sustainability and IFRS S2 Climate-related Disclosures Standard issued by the International Sustainability Standards Board (ISSB).

Water

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

Select all that apply

☑ Board-level committee

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

Select from:

☑ Yes

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

Select all that apply

☑ Board Terms of Reference

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

Select from:

☑ Scheduled agenda item in every board meeting (standing agenda item)

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

Select all that apply

☑ Overseeing and guiding scenario analysis

☑ Overseeing the setting of corporate targets

☑ Monitoring progress towards corporate targets

☑ Approving corporate policies and/or commitments

☑ Overseeing and guiding public policy engagement

☑ Monitoring the implementation of a climate transition plan

☑ Overseeing and guiding the development of a business strategy

☑ Overseeing and guiding acquisitions, mergers, and divestitures

☑ Monitoring compliance with corporate policies and/or commitments

☑ Overseeing and guiding the development of a climate transition plan

☑ Reviewing and guiding innovation/R&D priorities

☑ Approving and/or overseeing employee incentives

☑ Overseeing and guiding major capital expenditures

☑ Monitoring the implementation of the business strategy

☑ Overseeing reporting, audit, and verification processes

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

(4.1.2.6) Scope of board-level oversight

Select all that apply

☑ Risks and opportunities to our own operations

☑ Risks and opportunities to our investment activities

☑ The impact of our own operations on the environment

☑ The impact of our investing activities on the environment

(4.1.2.7) Please explain

The Board Sustainability Committee plays a key The Board Sustainability Committee plays a key role, to help Board of Directors by keeping track of local and international sustainability developments and advising the Executive Committee. It focuses on transparency, sustainability reporting, formulation of policies, and addressing ESG issues, ensuring stakeholder expectations are met. The Committee includes a Rapporteur and up to three Board Members, including the Chair, all appointed by the Board of Directors. The Chair of the Committee is chosen from the independent Board Members. The Committee meets at least twice a year and held 2 meetings in 2024. Working with the Sabancı Holding Human Capital and Sustainability Group Presidency, the Board Sustainability Committee oversees sustainability matters brought up by the Sustainability Leadership Committee or directly by the Sustainability Directorate. The Committee addresses issues related to the Holding's sustainability governance structure and developments in climate emergency. This includes discussions on IPCC reports, Science Based Targets initiative (SBTi) targets, greenhouse gas (GHG) emissions performance, progress on the Carbon Border Adjustment Mechanism (CBAM), and relevant EU environmental directives. In 2023, the committee approved interim GHG reduction targets consistent with the Paris Agreement. These targets include a 42% reduction by 2030 and a 15% reduction by 2025, compared to the 2021 baseline, supporting the Holding's long-term commitment to achieve net-zero emissions by 2050 in line with science-based recommendations. Building on this, in 2024 Sabancı Holding expanded its perspective from climate to nature and announced its water-related targets, aiming to achieve a 15% reduction in water consumption and a 10% reduction in water withdrawal by 2030. Additionally, The Committee oversights climate and water figures for Holding and Group companies. Granular analysis of this data has been conducted to gain deeper understanding of the Holding's climate and water performances, across sectors and individual companies. In addition, the Board of Directors is the ultimate body accountable for implementing Turkish Sustainability Reporting Standards (TSRS) climate-related disclosure requirements across Sabancı Group. TSRS, published by e Public Oversight, Accounting, and Auditing Standards Authority (KGK) as the national sustainability reporting standard, is a direct adoption of the IFRS S1 General Requirements for Disclosure of Sustainability and IFRS S2 Climate-related Disclosures Standard issued by the International Sustainability Standards Board (ISSB).

Biodiversity

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

Select all that apply

☑ Board-level committee

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

Select from:

☑ Yes

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

Select all that apply

☑ Board Terms of Reference

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

Select from:

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

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

Select all that apply

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

☑ Approving corporate policies and/or commitments

☑ Overseeing and guiding the development of a business strategy

☑ Overseeing and guiding major capital expenditures

(4.1.2.6) Scope of board-level oversight

Select all that apply

☑ Risks and opportunities to our investment activities

☑ The impact of our investing activities on the environment

(4.1.2.7) Please explain

The Board Sustainability Committee plays a key role in supporting the Board of Directors by monitoring local and international sustainability developments and advising the Executive Committee. It focuses on transparency, sustainability reporting, policy formulation, and ESG issues, ensuring stakeholder expectations are met. The Committee includes a Rapporteur and up to three Board Members, including the Chair, all appointed by the Board of Directors. The Chair is chosen from the independent Board Members. The Committee meets at least twice a year and held two meetings in 2024. Working with the Sabancı Holding Human Capital and Sustainability Group Presidency, the Committee oversees sustainability matters brought by the Sustainability Leadership Committee or the Sustainability Directorate. It addresses governance and climate-related developments, recognizing biodiversity loss as a material risk for operations and finance. Such risks stem from both companies' impacts on natural resources and their dependence on them. In 2023, Sabancı Group launched a comprehensive biodiversity project to mitigate these risks and strengthen resilience against climate change. The project began with training and alignment programs to ensure employees understand the importance of biodiversity preservation. Building on this foundation, Group companies identified sensitive ecosystems intersecting with their operations, guided by the Taskforce on Nature-related Financial Disclosures (TNFD). This process enabled an evaluation of potential impacts and dependencies, clarifying risks and opportunities. As these efforts persist, the implementation of our policies focused on biodiversity and nature further enable impactful outcomes. Our Responsible Investment Policy supports this by establishing an exclusion list aligned with biodiversity standards, applied to all investments. For large-scale projects exceeding USD 10 million, potential

environmental and social risks are assessed in line with IFC Performance Standards or EBRD Performance Requirements. ESG due diligence, including biodiversity criteria, is implemented across the value chain. The next phase focuses on conservation and restoration, supported by field-based assessments. Companies will seek full TNFD alignment by assessing ecosystem services at selected sites and embedding actions into operations. They will also evaluate opportunities to establish carbon sink areas, ensuring synergies between climate and biodiversity goals. Together, these steps will advance nature-positive outcomes across the Sabancı Group.
[Fixed row]

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

Climate change

(4.2.1) Board-level competency on this environmental issue

Select from:
☑ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

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

(4.2.3) Environmental expertise of the board member

Experience
☑ Executive-level experience in a role focused on environmental issues
☑ Management-level experience in a role focused on environmental issues
☑ Active member of an environmental committee or organization

Water

(4.2.1) Board-level competency on this environmental issue

Select from:

☑ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

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

☑ Engaging regularly with external stakeholders and experts on environmental issues

☑ Integrating knowledge of environmental issues into board nominating process

☑ Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)

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

(4.2.3) Environmental expertise of the board member

Experience

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

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

☑ Active member of an environmental committee or organization

[Fixed row]

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

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

[Fixed row]

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

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Executive Officer (CEO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

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

☑ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

☑ Managing public policy engagement related to environmental issues

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

☑ Measuring progress towards environmental corporate targets

☑ Setting corporate environmental policies and/or commitments

☑ Setting corporate environmental targets

Strategy and financial planning

☑ Developing a climate transition plan

☑ Implementing a climate transition plan

☑ Conducting environmental scenario analysis

☑ Implementing the business strategy related to environmental issues

☑ Developing a business strategy which considers environmental issues

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

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

Other

☑ Providing employee incentives related to environmental performance

(4.3.1.3) Coverage of responsibilities

Select all that apply

☑ Dependencies, impacts, risks, and opportunities related to our investing activities

(4.3.1.4) Reporting line

Select from:

☑ Reports to the board directly

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

Select from:

☑ Quarterly

(4.3.1.6) Please explain

The CEO of Sabancı Holding has the primary responsibility for overseeing and assessing sustainability-related risks and opportunities, including those associated with climate-related and water-related performance and targets. For example, the CEO reviews the evaluation of sustainability risks across the investee companies and suggests improvements during Risk Coordination Committee meetings. The Sustainability Leadership Committee reports directly to the CEO, who also attends the Committee's meetings when necessary. The Committee meets at least four times a year, with additional meetings as needed, and reports its outcomes to the Board. The Sustainability Leadership Committee keeps track of international developments, public regulations, and sustainability trends for scenario analysis. It advises the Thematic Task Forces and promotes the sharing of expertise and best practices among Group companies. Sustainability Coordinators from Group companies contribute to the Committee through these Task Forces, allowing the CEO to stay informed about the Holding's sustainability practices. The CEO's climate- and water-related responsibilities include overseeing: • Assessment and management of risks and opportunities • Setting targets and monitoring progress • Implementing the climate transition plan • Managing public policy and value chain engagement • Integrating water and climate-related issues into the strategic decisions • Managing major capital and operational expenditures related to low-water impact products or services • Managing water and climate-related acquisitions, mergers, and divestitures • Providing water and climate-related employee incentives, aligned with the company's environmental performance.

Water

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Executive Officer (CEO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

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

☑ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

☑ Managing public policy engagement related to environmental issues

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

☑ Measuring progress towards environmental corporate targets

☑ Setting corporate environmental policies and/or commitments

☑ Setting corporate environmental targets

Strategy and financial planning

☑ Developing a climate transition plan

☑ Implementing a climate transition plan

☑ Conducting environmental scenario analysis

☑ Implementing the business strategy related to environmental issues

☑ Developing a business strategy which considers environmental issues

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

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

Other

☑ Providing employee incentives related to environmental performance

(4.3.1.3) Coverage of responsibilities

Select all that apply

☑ Dependencies, impacts, risks, and opportunities related to our investing activities

(4.3.1.4) Reporting line

Select from:

☑ Reports to the board directly

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

Select from:

☑ Quarterly

(4.3.1.6) Please explain

The CEO of Sabancı Holding has the primary responsibility for overseeing and assessing sustainability-related risks and opportunities, including those associated with climate-related and water-related performance and targets. For example, the CEO reviews the evaluation of sustainability risks across the investee companies and suggests improvements during Risk Coordination Committee meetings. The Sustainability Leadership Committee reports directly to the CEO, who also attends the Committee's meetings when necessary. The Committee meets at least four times a year, with additional meetings as needed, and reports its outcomes to the Board. The Sustainability Leadership Committee keeps track of international developments, public regulations, and sustainability trends for scenario analysis. It advises the Thematic Task Forces and promotes the sharing of expertise and best practices among Group companies. Sustainability Coordinators from Group companies contribute to the Committee through these Task Forces, allowing the CEO to stay informed about the Holding's sustainability practices. The CEO's climate- and water-related responsibilities include overseeing: • Assessment and management of risks and opportunities • Setting targets and monitoring progress • Implementing the climate transition plan • Managing public policy and value chain engagement • Integrating water and climate-related issues into the strategic decisions • Managing major capital and operational expenditures related to low-water impact products or services • Managing water and climate-related acquisitions, mergers, and divestitures • Providing water and climate-related employee incentives, aligned with the company's environmental performance.

Biodiversity

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Executive Officer (CEO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

Policies, commitments, and targets

☑ Setting corporate environmental targets

Strategy and financial planning

☑ Implementing the business strategy related to environmental issues

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

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

(4.3.1.3) Coverage of responsibilities

Select all that apply

☑ Dependencies, impacts, risks, and opportunities related to our investing activities

(4.3.1.4) Reporting line

Select from:

☑ Reports to the board directly

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

Select from:

☑ Annually

(4.3.1.6) Please explain

The CEO of Sabancı Holding has the primary responsibility for overseeing and assessing sustainability-related risks and opportunities, including those associated with climate-related and water-related performance and targets. For example, the CEO reviews the evaluation of sustainability risks across the investee companies and suggests improvements during Risk Coordination Committee meetings. The Sustainability Leadership Committee reports directly to the CEO, who also attends the Committee's meetings when necessary. The Committee meets at least four times a year, with additional meetings as needed, and reports its outcomes to the Board. • The Sustainability Leadership Committee keeps track of international developments, public regulations, and sustainability It advises the Thematic Task Forces and promotes the sharing of expertise and best practices among Group companies. Sustainability Coordinators from Group companies contribute to the Committee through these Task Forces, allowing the CEO to stay informed about the Holding's sustainability practices. The CEO's biodiversity responsibilities include overseeing: • Setting targets and monitoring progress • Implementing the climate transition plan • Integrating biodiversity related issues into the strategic decisions • Managing major capital and operational expenditures related to • Managing acquisitions, mergers, and divestitures • Providing employee incentives, aligned with the company's environmental performance.
[Add row]

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

Climate change

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

Select from:

☑ Yes

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

10

(4.5.3) Please explain

Sustainability targets are embedded in the remuneration of Holding Group Presidents (also members of Sustainability Leadership Committee) and CEOs of Group companies at a rate of up to 10%. The targets include climate-related targets directly or indirectly in addition to other metrics such as completing biodiversity assessment project, water initiatives or circularity programs.

Water

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

Select from:

☑ Yes

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

10

(4.5.3) Please explain

Sustainability targets are embedded in the remuneration of Holding Group Presidents (also members of Sustainability Leadership Committee) and CEOs of Group companies at a rate of up to 10%. The targets include climate-related targets directly or indirectly in addition to other metrics such as completing biodiversity assessment project, water initiatives or circularity programs.
[Fixed row]

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

Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☑ Board/Executive board

(4.5.1.2) Incentives

Select all that apply

☑ Bonus - % of salary

(4.5.1.3) Performance metrics

Targets

☑ Progress towards environmental targets

☑ Achievement of environmental targets

☑ Organization performance against an environmental sustainability index

☑ Reduction in absolute emissions in line with net-zero target

Strategy and financial planning

☑ Achievement of climate transition plan

☑ Shift to a business model compatible with a net-zero carbon future

☑ Increased proportion of revenue from low environmental impact products or services

☑ Increased alignment of capex with transition plan and/or sustainable finance taxonomy

☑ Other strategy and financial planning-related metrics, please specify :Capital allocation

Emission reduction

☑ Reduction in emissions intensity

☑ Reduction in absolute emissions

☑ Emissions reductions across portfolio companies

☑ Other emission reduction-related metrics, please specify :Completion of SBTi approval process, etc.

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

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

(4.5.1.5) Further details of incentives

ESG performance, including but not limited to those that are related to climate issues, are embedded in executive management's performance goals including the Holding CEO, Holding Group Presidents and Group (i.e. investee) company CEOs. Sustainability KPIs make up to 10% of C-Level executives' bonus schemes including the CEOs and Group Presidents, who are also members of the investee company BoDs. Within this range, they receive a premium according to the target progress. The CEOs of investee companies and Holding Group Presidents are also responsible of the management of the net-zero roadmap of Sabancı Group, and this is a part of their performance targets. Such performance targets require Board approval of emission reduction targets and climate transition plans.

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

We identify all our environmental impacts, develop targets, programs, initiatives and monitoring systems, review them, and take measures for improvement purposes. Starting in 2021, we strengthened our commitment by introducing interim GHG reduction targets and both water consumption and water withdrawal targets., At Sabancı Holding we approach sustainability through a holistic lens and are committed to advancing a broader nature-based perspective. By integrating climate efforts with nature-positive actions, we aim to contribute to a more balanced and thriving future for both our business and society as a whole. In this regard, our efforts have expanded from decarbonization to a comprehensive nature program, employing both an outside-in and inside-out approach in line with the double materiality approach. Sabancı Holding's Nature Agenda includes our efforts in four key areas, namely Decarbonization Initiatives, Water Management, Biodiversity, and Circular Economy. Sabancı Holding and its Group companies outlined specific actions to reduce environmental impact, and 15 Decarbonization Levers were established to accelerate the transition across the industries in which we operate. By focusing on these key areas, Sabancı Group aims to make the highest possible contribution to the transition towards a more sustainable economy. Sabancı Holding, aiming to continuously improve its ESG practices, also aims to enhance its performance in the most prestigious sustainability ratings and indices such as CDP, Refinitiv, etc. Linking performance targets to climate and water-related initiatives fosters a stronger commitment to sustainability throughout the organization, resulting in more effective implementation of environmental programs and continued progress towards environmental goals.

Water

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☑ Board/Executive board

(4.5.1.2) Incentives

Select all that apply

☑ Bonus - % of salary

(4.5.1.3) Performance metrics

Targets

☑ Progress towards environmental targets

☑ Organization performance against an environmental sustainability index

Strategy and financial planning

☑ Increased proportion of revenue from low environmental impact products or services

Resource use and efficiency

☑ Reduction of water withdrawal and/or consumption volumes – downstream value chain (excluding direct operations)

Policies and commitments

☑ Increased supplier compliance with environmental requirements

Engagement

☑ Increased engagement with suppliers on environmental issues

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

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

(4.5.1.5) Further details of incentives

ESG performance, including but not limited to those that are related to water issues, are embedded in executive management's performance goals including the Holding CEO, Holding Group Presidents and Group (i.e. investee) company CEOs. Sustainability KPIs make up to 10% of C-Level executives' bonus schemes including the CEOs and Group Presidents, who are also members of the investee company BoDs. Within this range, they receive a premium according to the target progress. The CEOs of Group companies and Holding Group Presidents are also responsible of the management of the Sustainability Roadmap of Sabancı Group,

and this is a part of their performance targets. Sabancı Holding determines KPIs for its executives and employees in order to incentivize achieving its climate and water-related business goals. The realization of the performance targets by the C-level and Group companies ensures the continuity of progress and success in implementing sustainability programs. In summary, continued progress on climate is sup-ported by monetary rewards to the employees.

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

We identify all our environmental impacts, develop targets, programs, initiatives and monitoring systems, review them, and take measures for improvement purposes. Starting in 2021, we strengthened our commitment by introducing interim GHG reduction targets and both water consumption and water withdrawal targets., At Sabancı Holding we approach sustainability through a holistic lens and are committed to advancing a broader nature-based perspective. By integrating climate efforts with nature-positive actions, we aim to contribute to a more balanced and thriving future for both our business and society as a whole. In this regard, our efforts have expanded from decarbonization to a comprehensive nature program, employing both an outside-in and inside-out approach in line with the double materiality approach. Sabancı Holding's Nature Agenda includes our efforts in four key areas, namely Decarbonization Initiatives, Water Management, Biodiversity, and Circular Economy. Sabancı Holding and its Group companies outlined specific actions to reduce environmental impact, and 15 Decarbonization Levers were established to accelerate the transition across the industries in which we operate. By focusing on these key areas, Sabancı Group aims to make the highest possible contribution to the transition towards a more sustainable economy. Sabancı Holding, aiming to continuously improve its ESG practices, also aims to enhance its performance in the most prestigious sustainability ratings and indices such as CDP, Refinitiv, etc. Linking performance targets to climate and water-related initiatives fosters a stronger commitment to sustainability throughout the organization, resulting in more effective implementation of environmental programs and continued progress towards environmental goals.
[Add row]

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

	Does your organization have any environmental policies?
	Select from: ☑ Yes

[Fixed row]

(4.6.1) Provide details of your environmental policies.

Row 1

(4.6.1.1) Environmental issues covered

Select all that apply

☑ Climate change

☑ Water

☑ Biodiversity

(4.6.1.2) Level of coverage

Select from:

☑ Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

☑ Portfolio

(4.6.1.4) Explain the coverage

As Sabancı Holding, we adhere to comprehensive Environmental Policy and Responsible Investment Policy that apply across our operations and investments. These policies prioritize environmental sustainability and social responsibility through efficient natural resource use, enhanced energy and water efficiency, improved waste management, emissions reduction, and ecosystem protection. Our investee companies also maintain specific water and environmental policies aligned with these principles. Key commitments under our policies include: • Continuously monitoring environmental performance to reduce natural resource consumption. • Setting environmental standards above regulatory requirements and adopting best practices. • Assessing water resource impacts by industry, implementing efficiency measures, and managing environmental risks associated with water use. • Evaluating all environmental impacts, developing targeted programs, establishing monitoring systems, and implementing improvement measures. • Integrating the SDGs into our operations, with a focus on universal access to water and sanitation rights and preserving freshwater ecosystems, including avoiding activities that threaten RAMSAR areas. Additionally, we also utilize our responsible investment policy to make sure that we integrate environmental sustainability and social responsibility to our capital allocation criteria, both for our current business and new investments.

(4.6.1.5) Environmental policy content

Environmental commitments

☑ Commitment to a circular economy strategy
☑ Commitment to no trade of CITES listed species
☑ Commitment to respect legally designated protected areas
☑ Commitment to comply with regulations and mandatory standards
☑ Commitment to take environmental action beyond regulatory compliance
☑ Commitment to avoidance of negative impacts on threatened and protected species
☑ Commitment to stakeholder engagement and capacity building on environmental issues
☑ Commitment to engage in integrated, multi-stakeholder landscape (including river basin) initiatives to promote shared sustainability goals

Climate-specific commitments

☑ Commitment to 100% renewable energy
☑ Commitment to net-zero emissions

Water-specific commitments

☑ Commitment to control/reduce/eliminate water pollution
☑ Commitment to reduce water consumption volumes
☑ Commitment to the conservation of freshwater ecosystems
☑ Commitment to water stewardship and/or collective action

Social commitments

☑ Adoption of the UN International Labour Organization principles
☑ Commitment to promote gender equality and women's empowerment
☑ Commitment to respect and protect the customary rights to land, resources, and territory of Indigenous Peoples and Local Communities
☑ Commitment to respect internationally recognized human rights
☑ Commitment to secure Free, Prior, and Informed Consent (FPIC) of indigenous people and local communities

Additional references/Descriptions

☑ Description of environmental requirements for procurement
☑ Description of impacts on natural resources and ecosystems
☑ Description of renewable electricity procurement practices
☑ Reference to timebound environmental milestones and targets

☑ Description of dependencies on natural resources and ecosystems

☑ Description of membership and financial support provided to organizations that seek to influence public policy

☑ Description of grievance/whistleblower mechanism to monitor non-compliance with the environmental policy and raise/address/escalate any other greenwashing concerns

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

Select all that apply

☑ Yes, in line with the Paris Agreement

☑ Yes, in line with Sustainable Development Goal 6 on Clean Water and Sanitation

(4.6.1.7) Public availability

Select from:

☑ Publicly available

(4.6.1.8) Attach the policy

SABANCI HOLDING_policies.pdf
[Add row]

(4.7) Does the policy framework for the portfolio activities of your organization include environmental requirements that clients/investees need to meet, and/or exclusion policies?

	Policy framework for portfolio activities include environmental requirements for clients/investees, and/or exclusion policies
Investing (Asset owner)	*Select from:*

	Policy framework for portfolio activities include environmental requirements for clients/investees, and/or exclusion policies
	☑ Yes, our framework includes both policies with environmental client/investee requirements and environmental exclusion policies

[Fixed row]

(4.7.1) Provide details of the policies which include environmental requirements that clients/investees need to meet.

Investing (Asset owner)

(4.7.1.1) Environmental issues covered

Select all that apply

☑ Climate change

☑ Water

(4.7.1.2) Type of policy

Select all that apply

☑ Sustainable/Responsible Investment Policy

☑ Investment policy/strategy

(4.7.1.3) Public availability

Select from:

☑ Publicly available

(4.7.1.4) Attach the policy

SAHOL-Policy-ENG.pdf

(4.7.1.5) Value chain stages of client/investee covered by policy

Select from:

☑ Direct operations and upstream/downstream value chain

(4.7.1.6) Industry sectors covered by the policy

Select all that apply

☑ Retail

☑ Services

☑ Materials

☑ Manufacturing

☑ Infrastructure

☑ Power generation

(4.7.1.9) % of portfolio covered by the policy in relation to total portfolio value

100

(4.7.1.11) Explain how criteria coverage and/or exceptions have been determined

Sabancı Holding's investment portfolio covers industries such as banking, financial services, material technologies, energy, mobility solutions and digital. As a result of a variety of analyses (incl. peer, regulation, and trends analysis, etc.) made in 2020 in order to determine the scope of climate-related policies and actions, it was decided that all of these sectors will directly be impacted from climate emergency in terms of risks, opportunities or both. Sabancı Holding developed a Group wide Responsible Investment Policy to guide the capital allocation decisions of Sabancı Holding and to ensure the sustainability of the Group's value chain. The Policy regulates the minimum standards on the following subjects that will form the basis of the business areas in which the Holding operates and the value chains of the Group companies and includes exclusions on carbon intensive sectors such as coal to power or coal mining. The Policy also includes provisions on incentivizing suppliers with better climate disclosures and net zero emissions targets. To be able to monitor the companies impacts, Sabancı Holding request scope 1&2&3 GHG emissions data, emission reduction targets and climate related business plan from the investee companies. The Holding takes into account the climate transition plan and emission intensity of the new investments in accordance with the Responsible Investment Policy when making a new investment decision. In this context, there are cases where the investment decision has not been approved by the Investment Committee or the Board of Directors due to investments' negative impact on the environment. Therefore, complying with these criteria are required from portfolio companies. Finally, Sabancı Holding Investment and Capital Allocation criteria includes 1) 75% of non-bank capex for transformation & adjacencies focusing on new economy areas (new economy refers to energy & climate technologies, material technologies and digital technologies); 2) requires alignment of the existing and new businesses with Sabancı Holding's interim and long term GHG emissions reduction targets 3) Consistency with Sabancı Group's Responsible Investment Policy 4) Decarbonization potential of the investment to align 1.5 degree 5) Contribution to SDGs.

(4.7.1.12) Requirements for clients/investees

Environmental commitments

☑ Commitment to comply with regulations and mandatory standards

☑ Commitment to take environmental action beyond regulatory compliance

☑ Commitment to stakeholder engagement and capacity building on environmental issues

Climate-specific commitments

☑ Commitment to net-zero emissions

☑ Commitment to disclose Scope 1 emissions

☑ Commitment to disclose Scope 2 emissions

☑ Commitment to disclose Scope 3 emissions

☑ Commitment to develop a climate transition plan

☑ Commitment to not invest in fossil-fuel expansion

☑ Commitment to set a science-based emissions reduction target

☑ Other climate-related commitment, please specify **:Exclusions on some of the carbon-intensive sectors such as new coal mines**

Water-specific commitments

☑ Commitment to safely managed WASH in local communities

☑ Commitment to water stewardship and/or collective action

(4.7.1.13) Measurement of proportion of clients/investees compliant with the policy

Select from:

☑ Yes

(4.7.1.14) % of clients/investees compliant with the policy

100

(4.7.1.15) % of portfolio value that is compliant with the policy

100

(4.7.1.16) Target year for 100% compliance

Select from:
☑ Already met
[Add row]

(4.7.2) Provide details of your exclusion policies related to industries, activities and/or locations exposed or contributing to environmental risks.

Investing (Asset owner)

(4.7.2.1) Type of exclusion policy

Select from:
☑ Coal mining

(4.7.2.2) Fossil fuel value chain

Select all that apply
☑ Downstream

(4.7.2.3) Year of exclusion implementation

2022

(4.7.2.4) Phaseout pathway

Select all that apply
☑ New business/investment for new projects
☑ New business/investment for existing projects

(4.7.2.5) Year of complete phaseout

2022

(4.7.2.6) Country/area the exclusion policy applies to

Select all that apply

☑ Worldwide

(4.7.2.7) Description

In Sabancı Holding's 2022-2026 Strategy, energy and utilities business is focusing on renewable electricity generation growth, which is also in line with our Group-wide Net Zero Emission Target. Our Responsible Investment Policy also excludes coal to electricity and coal mining and Akbank's Sustainable Finance Framework excludes new coal mining, new coal transportation, new coal-fired power plants, or new infrastructure services exclusively dedicated to support any of these activities. Since these policies include all new business/investment for new projects related to coal power plants, the threshold for revenues, capacity, etc. is zero. In addition, please see the Group's environmental exclusion list which includes coal mining and new coal power plants, and which is disclosed in Sabancı Group's Responsible Investment Policy available at https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL-Policy-ENG.pdf. The timeframe for implementing the exclusions for new investments is 2022 onwards.

Investing (Asset owner)

(4.7.2.1) Type of exclusion policy

Select from:

☑ Power from coal

(4.7.2.2) Fossil fuel value chain

Select all that apply

☑ Downstream

(4.7.2.3) Year of exclusion implementation

2022

(4.7.2.4) Phaseout pathway

Select all that apply

☑ New business/investment for new projects

☑ New business/investment for existing projects

(4.7.2.5) Year of complete phaseout

2022

(4.7.2.6) Country/area the exclusion policy applies to

Select all that apply

☑ Worldwide

(4.7.2.7) Description

New investments: In Sabancı Holding's 2022-2026 Strategy, energy and utilities business is focusing on renewable electricity generation growth, which is also in line with our Group-wide Net Zero Emission Target. Our Responsible Investment Policy also excludes coal to electricity and coal mining and Akbank's Sustainable Finance Framework excludes new coal mining, new coal transportation, new coal-fired power plants, or new infrastructure services exclusively dedicated to support any of these activities. Since these policies include all new business/investment for new projects related to coal power plants, the threshold for revenues, capacity, etc. is zero. In addition, please see the Group's environmental exclusion list which includes coal mining and new coal power plants, and which is disclosed in Sabancı Group's Responsible Investment Policy available at https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL-Policy-ENG.pdf. The timeframe for implementing the exclusions for new investments is 2022 onwards.
[Add row]

(4.9) Does your organization offer its employees a pension scheme that incorporates environmental criteria in its holdings?

Climate change

(4.9.1) Pension scheme incorporates environmental criteria in its holdings

Select from:

☑ Yes, as the default investment strategy for all plans

(4.9.2) Describe how funds within the pension scheme are selected and how your organization ensures that environmental criteria are incorporated

Sabancı Holding provides the opportunity to have a Private Individual Pension Plan as a retirement plan for its all all employees, including those of Group companies. Employees are free to choose from different pension funds, including ESG-related ones. AgeSA, Sabancı Holding's insurance company, has integrated the Sustainability Fund into nine pension plans as the default investment strategy, representing the largest fund size and number of participants. The Fund has also been incorporated into the new recommendation packages of its digital fund management tool, FonPro, thereby contributing to the growth of the fund and encouraging customers to direct their savings toward sustainable investments. In 2024, in line with its Responsible Investment Policy, AgeSA excluded companies engaged in prohibited activities or assessed as high-risk in terms of ESG criteria from its investment portfolio, based on ESG risk analyses conducted within its investment processes.

Water

(4.9.1) Pension scheme incorporates environmental criteria in its holdings

Select from:

☑ Yes, as the default investment strategy for all plans

(4.9.2) Describe how funds within the pension scheme are selected and how your organization ensures that environmental criteria are incorporated

Sabancı Holding provides the opportunity to have a Private Individual Pension Plan as a retirement plan for its all all employees, including those of Group companies. Employees are free to choose from different pension funds, including ESG-related ones. AgeSA, Sabancı Holding's insurance company, has integrated the Sustainability Fund into nine pension plans as the default investment strategy, representing the largest fund size and number of participants. The Fund has also been incorporated into the new recommendation packages of its digital fund management tool, FonPro, thereby contributing to the growth of the fund and encouraging customers to direct their savings toward sustainable investments. In 2024, in line with its Responsible Investment Policy, AgeSA excluded companies engaged in prohibited activities or assessed as high-risk in terms of ESG criteria from its investment portfolio, based on ESG risk analyses conducted within its investment processes.
[Fixed row]

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

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

Select from:

☑ Yes

(4.10.2) Collaborative framework or initiative

Select all that apply

☑ UNEP FI

☑ CEO Water Mandate

☑ UN Global Compact

☑ UNEP FI Principles for Responsible Banking

☑ World Business Council for Sustainable Development (WBCSD)

☑ Other, please specify **:Turkish Industry and Business Association (TÜSİAD), the World Economic Forum (WEF), the CNBC ESG Council, European Roundtable Climate Task Force, Chapter Zero Türkiye**

☑ Net Zero Banking Alliance

☑ Science-Based Targets Initiative (SBTi)

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

Sabancı Group Board Members and executives actively participate in meetings, workshops to mentioned frameworks and initiatives as members. Sabancı Holding and most of the investee companies are disclosing to IFRS (TSRS S1&S2) CDP, TCFD, UNGC and working with SBTN. Our Group is represented at The World Energy Council as Board Member and as a Partner in the World Economic Forum (WEF). We support the activities of the WBCSD through various working groups and by being a member of the Business Commission to Tackle Inequality (BCTI). In addition, Sabancı Holding's banking Group company, Akbank, is a member of UNEP FI and have also joined the Net Zero Banking Alliance with a commitment to achieve net zero by 2050. In addition, our material technologies Group company Akçansa and mobility solutions Group company Brisa have become a signatory of the CEO Water Mandate, being one of only eight companies in Türkiye to join this initiative.
[Fixed row]

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

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

Select all that apply

☑ Yes, we engaged directly with policy makers

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

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

Select from:

☑ Yes, we have a public commitment or position statement in line with global environmental treaties or policy goals

(4.11.3) Global environmental treaties or policy goals in line with public commitment or position statement

Select all that apply

☑ Paris Agreement

☑ Sustainable Development Goal 6 on Clean Water and Sanitation

(4.11.4) Attach commitment or position statement

Sabanci-Holding-Sustainability-2024-Report.pdf

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

Select from:

☑ Yes

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

Select all that apply

☑ Mandatory government register

☑ Non-government register

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

Sabancı Holding is registered with the government under trade registry number 127350, ensuring transparency and accountability through Türkiye's Central Registration System (MERSİS). Additionally, Sabancı Holding supports transparency through its affiliations with the WBCSD and TÜSİAD.

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

Sabancı Holding is registered with the government under trade registry number 127350, ensuring transparency and accountability through Türkiye's Central Registration System (MERSİS). Additionally, Sabancı Holding supports transparency through its affiliations with the WBCSD and TÜSİAD.

[Fixed row]

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

Row 1

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

Mandatory climate-related reporting, ETS mechanisms Non-Governmental Organization (NGO) or charitable organization (International Sustainability Standards Board), EU Green Deal, Carbon Border Adjustment Mechanism, High-integrity voluntary carbon markets, Phase-out from fossil fuel subsidies, Climate finance, Scaling and standardizing de-risking tools, Renewable & Clean energy expansion

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

Select all that apply

☑ Climate change

☑ Water

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

Environmental impacts and pressures

☑ Emissions – CO2

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

Select from:

☑ National

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

Select all that apply

☑ Turkey

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

Select from:

☑ Support with no exceptions

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

Select all that apply

☑ Regular meetings

☑ Ad-hoc meetings

☑ Discussion in public forums

☑ Participation in working groups organized by policy makers

☑ Submitting written proposals/inquiries

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

0

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

It is important for Sabancı Holding that its investee companies are in line with the most recent climate-related regulations worldwide and are supported by climate-related regulations/incentives. Therefore, Türkiye's adaptation to global practices will fasten our transition in terms of having the same understanding of climate issues and benefiting from the same level of incentives with global peers. Accordingly, we engage with policy makers and support the development of policies that will contribute to Türkiye's development as a whole, while being on track with 1.5-degree scenario. Alignment with the country's ambitions will help Sabancı Holding to achieve its long-term climate related goals and targets. As an investment holding, Sabancı Holding operates in sectors where water is a critical resource. Our commitment to sustainable water management aligns with our Nature Agenda, which prioritizes environmental stewardship across our operations. Engagement with policymakers is crucial for achieving our environmental commitments and transition plans.

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

Select from:

☑ Yes, we have evaluated, and it is aligned

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

Select all that apply

☑ Paris Agreement

☑ Sustainable Development Goal 6 on Clean Water and Sanitation

[Add row]

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

Row 1

(4.11.2.1) Type of indirect engagement

Select from:

☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

Europe

☑ Other trade association in Europe, please specify :BCSD Türkiye, TÜSİAD

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

Select all that apply

☑ Climate change

☑ Water

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

Select from:

☑ Consistent

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

Select from:

☑ Yes, we publicly promoted their current position

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

TÜSİAD (Turkish Industry and Business Association) is one of the leading organizations that represents the Turkish business world. We actively participate in TÜSİAD's working groups on matters that overlap with the sectors we are involved in. By doing so, we monitor sectoral changes, contribute to the industry and share our insights. One of the roundtables within TÜSIAD is the Energy, Environment and Climate Change Roundtable, which one of our Holding Group Presidents serves as its chair. Energy, Environment and Climate Change Roundtable proposes innovative, technology and efficiency-focused and environment-friendly solutions for a competitive and predictable energy market. The Roundtable conducts studies on climate change, low carbon economy, circular economy, resource efficiency, and waste management. Our Group companies participate in TÜSİAD's Energy, Environment and Climate Change, Sustainable Finance, and Circular Economy working groups. Inputs from the Roundtable have been shared with various ministries and government institutions, covering topics like the Green Deal, Circular Economy Action Plan, Data Management, Access to Capital for Cities, and Natural Disaster Management. Sabancı Holding and some of the companies are members of Business Council for Sustainable Development Türkiye (BCSD Türkiye) The Council shares knowledge on sustainability with its members and stakeholders through the activities of its working groups. BCSD Türkiye focuses its activities on the following five areas within the framework of the UN's Sustainable Development Goals, and we work with the leader companies of Türkiye on sustainability: Transition to Low Carbon Economy and Efficiency, Sustainable Agriculture and Access to Food, Sustainable Industry and Circular Economy, Social Inclusion and The Sustainable Finance Forums. Sabancı Holding engages with WBCSD by actively participating in key working groups such as SOS 1.5 and BCTI. Through these groups, we collaborate on addressing global sustainability challenges, share expertise, and contribute to the development of innovative solutions. In addition to our involvement in working groups, we regularly attend WBCSD-organized events, where we engage with other leading companies to exchange insights and best practices related to sustainability. This engagement enables us to strengthen our ESG leadership and remain at the forefront of sustainability efforts across industries.

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

1740000

(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

At Sabancı Holding, we actively participate in various working groups within the World Business Council for Sustainable Development (WBCSD). Engaging with our peer groups in the sector through these initiatives allows us to collaborate effectively and share best practices. By learning from and contributing to these best practices, we aim to implement the most successful examples within our own operations and Group companies. This engagement not only enhances our sustainability efforts but also helps us align with industry standards and innovations. Through our participation in WBCSD, we strive to continuously improve our practices and contribute positively to the broader sustainability landscape. Our commitment to collaboration and knowledge sharing is integral to achieving our environmental and operational goals.

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

Select from:

☑ Yes, we have evaluated, and it is aligned

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

Select all that apply

☑ Paris Agreement

☑ Sustainable Development Goal 6 on Clean Water and Sanitation

[Add row]

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

Select from:

☑ Yes

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

Row 1

(4.12.1.1) Publication

Select from:

☑ In mainstream reports, in line with environmental disclosure standards or frameworks

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

Select all that apply

☑ GRI

☑ TCFD

(4.12.1.3) Environmental issues covered in publication

Select all that apply

☑ Climate change

☑ Forests

☑ Water

☑ Biodiversity

(4.12.1.4) Status of the publication

Select from:

☑ Complete

(4.12.1.5) Content elements

Select all that apply

☑ Strategy

☑ Governance

☑ Emission targets

☑ Emissions figures

☑ Value chain engagement

☑ Dependencies & Impacts

☑ Public policy engagement

☑ Water accounting figures

☑ Risks & Opportunities ☑ Content of environmental policies

☑ Other, please specify :Circular Economy, SDG-Linked Products and Services, SDG-Linked R&D and Innovation, Environmental Investments and Expenditures, Strategy House, Value Creation Model, Waste Management, Energy Management, Water Management

(4.12.1.6) Page/section reference

Sustainability Report references: Strategy (pp.42–47); Governance (41, 55, 57); Public Policy Engagement (58, 160, 162); Value Chain Engagement (25–30); Dependencies, Impacts & Risks (32–39); Opportunities (34–35, 83–89); Emission Figures (25–30, 103, 167–169); Emission Targets (28–30); Water Accounting (108–111, 168); Biodiversity (112–118); Circular Economy (142–151); Environmental Policies (58–59), Biodiversity (112-118)

(4.12.1.7) Attach the relevant publication

Sabanci-Holding-Sustainability-2024-Report.pdf

(4.12.1.8) Comment

N/A
[Add row]

C5. Business strategy

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

Climate change

(5.1.1) Use of scenario analysis

Select from:
☑ Yes

(5.1.2) Frequency of analysis

Select from:
☑ Annually

Water

(5.1.1) Use of scenario analysis

Select from:
☑ Yes

(5.1.2) Frequency of analysis

Select from:
☑ Annually
[Fixed row]

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

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☑ NGFS scenarios framework, please specify :Net Zero 2050

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Portfolio

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Policy

☑ Market

☑ Technology

☑ Liability

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 1.5°C or lower

(5.1.1.7) Reference year

2024

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025
☑ 2030
☑ 2040
☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

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

Finance and insurance

☑ Sensitivity of capital (to nature impacts and dependencies)

Stakeholder and customer demands

☑ Impact of nature footprint on reputation

Regulators, legal and policy regimes

☑ Global regulation
☑ Level of action (from local to global)
☑ Global targets
☑ Methodologies and expectations for science-based targets

Relevant technology and science

☑ Granularity of available data (from aggregated to local)

Direct interaction with climate

☑ On asset values, on the corporate

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

The model was based on the following scope and assumptions. (1) Only the share of production exported to EU countries were affected, (2) 100% of the production in all emission-intensive sectors were affected regardless of their exports to EU, assuming that Türkiye becomes part of a wider carbon-tax/ETS mechanism, (3) Both scenarios cover Türkiye operations.

(5.1.1.11) Rationale for choice of scenario

Although a legally binding carbon pricing mechanism is not launched in Türkiye yet, the implementation of a national carbon pricing mechanism in the form of a carbon tax and/or an ETS is expected, bringing additional costs to sectors such as building materials, iron & steel and energy. Sabancı Holding developed scenarios based on the following assumptions to understand the potential financial impact of ETS on different sectors in Türkiye.

Water

(5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 2.6

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☑ SSP1

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Portfolio

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Acute physical
☑ Chronic physical
☑ Policy
☑ Market

(5.1.1.6) Temperature alignment of scenario

Select from:
☑ 1.6°C - 1.9°C

(5.1.1.7) Reference year

2024

(5.1.1.8) Timeframes covered

Select all that apply
☑ 2030
☑ 2040
☑ 2050
☑ 2100
☑ Other, please specify :2075

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts
☑ Changes to the state of nature
☑ Changes in ecosystem services provision

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

RCP 2.6 (Representative Concentration Pathway 2.6) is one of the four main greenhouse gas concentration pathways and represents an aggressive mitigation scenario aiming to keep global warming below 2°C. This scenario addresses impacts on ecosystems, sea level rise, and greenhouse gas emissions leading to

temperature increases. The assumptions underlying this scenario include ambitious emission reduction policies, rapid technological advancements, and strong economic and political responses such as binding international agreements and stringent new regulations. The effectiveness and consistent implementation of these policies by governments are key uncertainties within the scenario. Additionally, the speed of technological development and the degree of market and economic adaptation contribute to the uncertainty. In terms of implications, there are significant constraints, such as the availability and quality of data, which directly affect decision-making processes. Another major constraint is the time horizon. Aligning long-term climate scenarios with short-term financial planning presents a challenge that Sabancı Holding, like other organizations, may face periodically.

(5.1.1.11) Rationale for choice of scenario

The RCP 2.6 scenario offers a highly ambitious view of climate change mitigation, aiming to limit global warming to below 2°C. It provides a forward-looking picture of future climate conditions based on strong global efforts to reduce greenhouse gases. This scenario aligns with the most ambitious current and planned policies both globally and locally, reflecting a possible future path only if today's trends shift significantly towards rapid decarbonization and strong international commitments. For financial institutions like Sabancı Holding, using this scenario helps in stress-testing investment risks and opportunities under a strict regulatory and policy environment where carbon pricing, technological innovation, and transition pressures are accelerated.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☑ IEA NZE 2050

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Portfolio

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Policy
☑ Market
☑ Reputation
☑ Technology
☑ Liability

(5.1.1.6) Temperature alignment of scenario

Select from:
☑ 1.5°C or lower

(5.1.1.7) Reference year

2024

(5.1.1.8) Timeframes covered

Select all that apply
☑ 2025
☑ 2030
☑ 2040
☑ 2050

(5.1.1.9) Driving forces in scenario

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

Finance and insurance
☑ Sensitivity of capital (to nature impacts and dependencies)

Stakeholder and customer demands

☑ Impact of nature footprint on reputation

☑ Impact of nature service delivery on consumer

☑ Sensitivity to inequity of nature impacts

Regulators, legal and policy regimes

☑ Global regulation

☑ Level of action (from local to global)

☑ Global targets

☑ Methodologies and expectations for science-based targets

Relevant technology and science

☑ Granularity of available data (from aggregated to local)

Direct interaction with climate

☑ On asset values, on the corporate

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

This scenario projects a major shift in the transport industry, using electric vehicles and other technologies like hydrogen power cells. Fuel efficiency becomes a major issue. Carbon taxes and emission trading systems will be much more used globally, which means operational expenses will increase. The scenario analysis is based on several assumptions, including the gradual implementation of a Turkish ETS, potential price alignment with the EU ETS under CBAM, and the use of multiple internationally recognized pathways such as IEA, NGFS, and IIASA scenarios for carbon price projections. However, uncertainties remain regarding regulatory developments, the scope and timing of ETS implementation, sectoral decarbonization rates, and the pace of technological transformation. In addition, global market dynamics and geopolitical factors may lead to significant price fluctuations beyond modeled expectations. These limitations highlight that long-term projections are subject to uncertainty, and therefore results should be interpreted as indicative rather than absolute.

(5.1.1.11) Rationale for choice of scenario

In developing carbon price projections to assess the potential impact of ETS systems, Sabancı Holding has relied on the International Energy Agency's (IEA) scenarios. These scenarios were selected because they provide robust, widely recognized projections for energy and carbon markets, offering valuable insights into cost pressures, market dynamics, and regulatory impacts expected during the transition. The IEA scenarios are particularly relevant for evaluating how the Türkiye's prospective ETS may interact, as they reflect global energy system transformations and their implications for carbon pricing.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios
☑ RCP 2.6

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:
☑ SSP1

(5.1.1.3) Approach to scenario

Select from:
☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:
☑ Portfolio

(5.1.1.5) Risk types considered in scenario

Select all that apply
☑ Acute physical
☑ Chronic physical
☑ Policy
☑ Market

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 1.6°C - 1.9°C

(5.1.1.7) Reference year

2024

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2030

☑ 2040

☑ 2050

☑ 2100

☑ Other, please specify :2075

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Changes to the state of nature

☑ Speed of change (to state of nature and/or ecosystem services)

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

RCP 2.6 (Representative Concentration Pathway 2.6) is one of the four main greenhouse gas concentration pathways and represents an aggressive mitigation scenario aiming to keep global warming below 2°C. This scenario addresses impacts on ecosystems, sea level rise, and greenhouse gas emissions leading to temperature increases. The assumptions underlying this scenario include ambitious emission reduction policies, rapid technological advancements, and strong economic and political responses such as binding international agreements and stringent new regulations. The effectiveness and consistent implementation of these policies by governments are key uncertainties within the scenario. Additionally, the speed of technological development and the degree of market and economic adaptation contribute to the uncertainty. In terms of implications, there are significant constraints, such as the availability and quality of data, which directly affect decision-making processes. Another major constraint is the time horizon. Aligning long-term climate scenarios with short-term financial planning presents a challenge that Sabancı Holding, like other organizations, may face periodically.

(5.1.1.11) Rationale for choice of scenario

The RCP 2.6 scenario offers a highly ambitious view of climate change mitigation, aiming to limit global warming to below 2°C. It provides a forward-looking picture of future climate conditions based on strong global efforts to reduce greenhouse gases. This scenario aligns with the most ambitious current and planned policies both globally and locally, reflecting a possible future path only if today's trends shift significantly towards rapid decarbonization and strong international commitments. For financial institutions like Sabancı Holding, using this scenario helps in stress-testing investment risks and opportunities under a strict regulatory and policy environment where carbon pricing, technological innovation, and transition pressures are accelerated.

Water

(5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 8.5

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☑ SSP5

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Portfolio

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Acute physical

☑ Chronic physical

☑ Policy

☑ Market

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 4.0°C and above

(5.1.1.7) Reference year

2024

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2030

☑ 2040

☑ 2050

☑ 2100

☑ Other, please specify :2075

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Changes to the state of nature

☑ Speed of change (to state of nature and/or ecosystem services)

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

RCP 8.5 (Representative Concentration Pathway 8.5) is one of the four main greenhouse gas concentration pathways and represents a "business-as-usual" scenario with a high-emission trajectory. This scenario addresses severe impacts on ecosystems, sea level rise, freshwater resources, and greenhouse gas emissions leading to significant temperature increases. The assumptions underlying this scenario include very limited emission reduction efforts, continued reliance on fossil fuels, and fragmented economic and political responses with weak or delayed international cooperation. The absence of strong and coordinated climate policies by governments is a central uncertainty within the scenario. Additionally, the high dependence on carbon-intensive technologies and volatile market and economic reactions further contribute to uncertainty. In terms of implications, there are critical constraints, such as the availability and quality of data, which directly affect decision-making

processes. Another major constraint is the time horizon. Aligning long-term climate scenarios with short-term financial planning presents a challenge that Sabancı Holding, like other organizations, may face periodically.

(5.1.1.11) Rationale for choice of scenario

The RCP 8.5 scenario offers the most extreme view of climate change, assuming minimal mitigation and sustained high levels of greenhouse gas emissions. It provides a picture of future climate conditions shaped by heavy fossil fuel use and weak climate policies, leading to a projected warming of around 4.3°C (with a range of 3.3–5.7°C) by 2100. This scenario reflects a pathway where current policies are insufficient, and global commitments fail to curb emissions, resulting in severe climate risks. For financial institutions like Sabancı Holding, using this scenario helps in stress-testing investment risks and opportunities under a highly challenging regulatory and physical risk environment, where transition pressures are weak but physical climate impacts become dominant drivers of financial exposure.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 8.5

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☑ SSP5

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Portfolio

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Acute physical

☑ Chronic physical

☑ Policy

☑ Market

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 4.0°C and above

(5.1.1.7) Reference year

2024

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2030

☑ 2040

☑ 2050

☑ 2100

☑ Other, please specify :2075

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Changes to the state of nature

☑ Speed of change (to state of nature and/or ecosystem services)

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

RCP 8.5 (Representative Concentration Pathway 8.5) is one of the four main greenhouse gas concentration pathways and represents a "business-as-usual" scenario with a high-emission trajectory. This scenario addresses severe impacts on ecosystems, sea level rise, freshwater resources, and greenhouse gas emissions leading to significant temperature increases. The assumptions underlying this scenario include very limited emission reduction efforts, continued reliance on fossil fuels, and fragmented economic and political responses with weak or delayed international cooperation. The absence of strong and coordinated climate policies by governments is a central uncertainty within the scenario. Additionally, the high dependence on carbon-intensive technologies and volatile market and economic reactions further contribute to uncertainty. In terms of implications, there are critical constraints, such as the availability and quality of data, which directly affect decision-making processes. Another major constraint is the time horizon. Aligning long-term climate scenarios with short-term financial planning presents a challenge that Sabancı Holding, like other organizations, may face periodically.

(5.1.1.11) Rationale for choice of scenario

The RCP 8.5 scenario offers the most extreme view of climate change, assuming minimal mitigation and sustained high levels of greenhouse gas emissions. It provides a picture of future climate conditions shaped by heavy fossil fuel use and weak climate policies, leading to a projected warming of around 4.3°C (with a range of 3.3–5.7°C) by 2100. This scenario reflects a pathway where current policies are insufficient, and global commitments fail to curb emissions, resulting in severe climate risks. For financial institutions like Sabancı Holding, using this scenario helps in stress-testing investment risks and opportunities under a highly challenging regulatory and physical risk environment, where transition pressures are weak but physical climate impacts become dominant drivers of financial exposure.
[Add row]

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

Climate change

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

Select all that apply

☑ Risk and opportunities identification, assessment and management

☑ Strategy and financial planning

☑ Resilience of business model and strategy

☑ Capacity building

☑ Target setting and transition planning

(5.1.2.2) Coverage of analysis

Select from:

☑ Portfolio

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

Outcomes of scenario analysis affect risk and opportunities identification, assessment and management: It is important to conduct scenario and impact analysis to guide our investment decisions and shaping our nature agenda. Scenario analysis provides a foundation for Sabancı Holding in the strategic planning of the company by identifying & managing risks and opportunities, ensuring the resilience of the business model and strategy, and supporting capacity building. This includes protecting and expanding our core businesses and investing in new growth platforms to transform our portfolio. It also triggers new product/services development and diversification of assets for our investee companies. The following sectoral examples demonstrate how we shape our business operations using climate-related assessments, including scenario analyses, for strategy and financial planning, target setting, and transition planning. Capacity building: Enerjisa Üretim, aims to increase solar and wind capacity to 4,000 MW within three years and to reach around 4 GW by 2026, including Europe's largest onshore wind project. Investments also target energy storage and disruptive clean technologies across our geographies. Resilience of the business model: By expanding sustainable products and services, reinforced by R&D and digitalization, both Holding and Group companies are strengthening resilience against current and emerging sustainability trends. Akbank continues to lead sustainable finance in Türkiye with a strong commitment to climate action and inclusive growth The bank issued a USD 500 million sustainability Eurobond, completed USD 1.35 billion sustainability-linked syndicated loan, and introduced Türkiye's first global sustainable foreign trade financing. Besides, ESG-themed and ESG rated funds AuM reached TRY 13.6 billion, with 402 thousand investors (+132% year to date in number of investors The share of sustainability-linked transactions in wholesale funding rose to 69%, supporting the target of 100% by 2030. Strategy and financial planning: Our financial services investee companies (banking, insurance, pension) continue to develop sustainable finance offerings. By the end of 2023, it surpassed its initial sustainable finance target of TL 200 billion, raising the goal to TL 800 billion by 2030. In 2024 alone, Akbank provided TL 190 billion, bringing its cumulative contribution to TL 416 billion since 2021. Target setting and transition planning: Four of our Group companies have officially set their science-based targets aligned with the SBTi 1.5C scenario while another three has formally committed to the SBTi and currently undergoing the approval process. In 2023, Sabancı Holding set its interim GHG targets within the Nature Agenda, including a 42% reduction in Scope 1 and 2 emissions by 2030. Sabancı Holding became the first holding company in Türkiye to announce a net-zero emissions target by 2050. In 2024, Sabancı Holding also declared its water-related targets aiming 10% reduction in freshwater withdrawal and 15% reduction in water consumption of 2024 portfolio until 2030. Finally, the integration of sustainability criteria into the capital allocation framework enables Sabancı Holding to evaluate potential investments through a holistic perspective, ensuring their alignment with and contribution to transition actions.

Water

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

Select all that apply

☑ Risk and opportunities identification, assessment and management

☑ Strategy and financial planning

☑ Resilience of business model and strategy

☑ Capacity building

☑ Target setting and transition planning

(5.1.2.2) Coverage of analysis

Select from:

☑ Portfolio

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

Outcomes of scenario analysis affect risk and opportunities identification, assessment and management: It is important to conduct scenario and impact analysis to guide our investment decisions and shaping our nature agenda. Scenario analysis provides a foundation for Sabancı Holding in the strategic planning of the company by identifying & managing risks and opportunities, ensuring the resilience of the business model and strategy, and supporting capacity building. This includes protecting and expanding our core businesses and investing in new growth platforms to transform our portfolio. It also triggers new product/services development and diversification of assets for our investee companies. The following sectoral examples demonstrate how we shape our business operations using climate-related assessments, including scenario analyses, for strategy and financial planning, target setting, and transition planning. Sabancı Holding consistently strives to achieve early access to technological innovations and advancements. It aims to establish agile and technology-based growth platforms in areas such as energy, climate, and water technologies through its ARF and Ventures programs. Decisions taken for strategy and financial planning: We have a planned pledge of USD 5 Billion for SDG-related Capex & Opex investments, the majority of which are directly related to climate mitigation and adaptation that can also include water, between 2022 and 2027 that 28% has been completed as of 2024. Actions for capacity building: With the outcome of scenario analysis and being aware of the impacts of water supply disruption to resilience of our businesses, we launched a comprehensive water project across the Group in 2024. Outcomes of scenario analysis that influence target setting and transition planning: As Sabancı Holding, we mapped out our water withdrawal breakdown; freshwater withdrawal, consumption & water discharge and we decided to focus on our water consumption and freshwater withdrawal, in line with the SBTN and similar globally recognized frameworks in the short term. By consolidating water data and targets at the Holding level, we gained significant insights to inform strategic decision making in new investments and allocate resources effectively. Target Setting and Transition: In 2024, we established our water management plans with tangible targets aiming to reduce freshwater withdrawal of the 2024 portfolio by 10% and reducing water consumption of the 2024 portfolio by 15% until 2030 with 2022 base year. We also aim to integrate water management into investment due diligence and prioritize efficiency after acquisition.
[Fixed row]

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

(5.2.1) Transition plan

Select from:

☑ Yes, we have a climate transition plan which aligns with a 1.5°C world

(5.2.3) Publicly available climate transition plan

Select from:

☑ Yes

(5.2.7) Mechanism by which feedback is collected from shareholders on your climate transition plan

Select from:

☑ We do not have a feedback mechanism in place, but we plan to introduce one within the next two years

(5.2.10) Description of key assumptions and dependencies on which the transition plan relies

As Sabancı Holding, we recognize the critical role of nature in shaping our sustainable future. Our commitment extends beyond the conventional approach; we aspire to be leaders in championing a Nature-Based approach. In this regard, our efforts have expanded from decarbonization to a comprehensive nature program, employing both an outside-in and inside-out approach in line with the double materiality concept. The Nature Agenda at Sabancı Holding encompasses our initiatives across four key areas: Decarbonization, Water Management, Biodiversity, and Circular Economy. In all these subtopics, we consider our impacts and/or dependencies on nature. We have also done a double materiality assessment, through which we determined Holding's material issues, both in terms of its impact on nature and its dependencies on it. While building our business strategy, we focus on two main approaches: protect the value and create the value. By balancing these two focuses, we are ensuring the sustainability of our business while also fostering its growth and evolution. It is a dynamic approach that recognizes the importance of both preservation and progress. Protecting value reflects the preservation of core businesses and how we manage our current operations and the culture we foster within them. Following a responsible business approach, we focus on sustainable products, services, and sustainable finance. R&D, innovation and digitalization help us find new ways to accelerate the transformation to serve sustainability for a better life. Creating value reflects progress and growth to make a positive impact. Therefore, we seek opportunities to support innovative solutions that reshape industries and align with sustainable practices by investing in new growth platforms such as energy and climate technologies, material technologies and mobility solutions and digital technologies.

(5.2.11) Description of progress against transition plan disclosed in current or previous reporting period

In line with our strategic framework, Sabancı Group has developed a detailed decarbonization strategy to mitigate the risks associated with achieving the 1.5C target. Beginning this initiative in 2021, we have further strengthened our commitment by setting interim GHG emissions reduction targets as part of our Nature Agenda in 2023. This initiative was significant for identifying key areas for improvement in our pursuit of Net Zero Emissions. We have outlined specific measures and actions for both Sabancı Holding and its Group companies to reduce their environmental impact. In addition to our interim GHG emissions reduction target, Sabancı Holding has identified 15 decarbonization levers aimed at accelerating the transition process, effectively decarbonizing the various industries in which Sabancı Group operates. Aligned with our Nature Agenda, we continuously monitor our performance through the KPIs we have set. Sabancı Holding became the first investment Holding in Türkiye to publish a Nature Pledge. The Pledge includes performance metrics and targets on decarbonization, renewables, circularity, water, responsible investment and sustainable finance indicators such as the SDG-linked investment pledge and sustainable finance performance and targets, enabling year-on-year tracking of achievements and gaps disclosed in current and previous reporting periods.. As we track our 5 billion USD SDG-linked Investment Pledge, we have already achieved 28% of this commitment by the end of the 2024 reporting year. In line with Sabancı Holding's Nature Agenda, and alongside our interim and long-term decarbonization targets, we have set ambitious targets on circular economy and water management for year 2030 and 2050, respectively, while advancing biodiversity initiatives in collaboration with relevant Group companies.

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

Sabanci-Holding-Sustainability-2024-Report.pdf

(5.2.13) Other environmental issues that your climate transition plan considers

Select all that apply

☑ Water

☑ Biodiversity

(5.2.14) Explain how the other environmental issues are considered in your climate transition plan

Embedding nature into corporate strategy is not only about managing risk; it is also about identifying new opportunities for innovation, resilience, and future-fit growth in a rapidly changing operating environment. At Sabancı Holding, we approach sustainability through a holistic lens and are committed to advancing a broader Nature Agenda. By integrating climate efforts with nature-positive actions, we aim to contribute to a more balanced and thriving future for both our business and society as a whole. In this regard, our efforts have expanded from decarbonization to a comprehensive nature program, employing both an outside-in and inside-out perspective in line with the double materiality approach. Sabancı Holding's Nature Agenda includes our efforts in four key areas: Biodiversity, Circular Economy, Decarbonization Initiatives, and Water Management. Through these pillars, we aim to support the resilience of natural systems while also strengthening long-term value creation for our stakeholders. In 2024, building on the outcomes of our nature-focused initiatives, we became the first organization in Türkiye to publish a Nature Pledge outlining our future goals. This marked a significant evolution in our sustainability journey, expanding beyond decarbonization to embrace a broader, more impactful Nature Agenda.
[Fixed row]

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

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

Select from:

☑ Yes, both strategy and financial planning

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

Select all that apply

☑ Products and services

☑ Upstream/downstream value chain

☑ Investment in R&D

☑ Operations

[Fixed row]

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

Products and services

(5.3.1.1) Effect type

Select all that apply

☑ Risks

☑ Opportunities

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

Select all that apply

☑ Climate change

☑ Water

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

Considering both our impacts and dependencies on environmental risks and opportunities with an inside-out and outside-in approach, we are committed to transforming our core business areas. This involves developing SDG-linked products and services and investing in SDG-linked R&D and innovation with the aim of 70% SDG-linked R&D and innovation investment as of 2025 which we already surpassed as of 31 December 2024 with 71% share in total. Our efforts are also enriched through our environmental investments and expenditures which are beyond legal requirements. We divide our environmental investments and SDG-linked products & services into four categories as (1) mitigation, (2) transition, (3) enablers and (4) positive social impact. In 2024, with over 1,400 SDG-linked products and services offered across various sectors, we have generated a total of TRY 83 billion revenue from SDG-linked products and services. Besides, TRY 833 million SDG-linked R&D and innovation investments have been realized. In addition, TRY 4.2 billion environmental investments and TRY 595 million environmental expenditures beyond legal requirements were provided by Sabancı Group companies.

Upstream/downstream value chain

(5.3.1.1) Effect type

Select all that apply

☑ Risks

☑ Opportunities

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

Select all that apply

☑ Climate change

☑ Water

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

As Sabancı Group, we categorize our environmental investments, SDG-linked products, and services into four key areas: (1) mitigation, (2) transition, (3) enablers, and (4) positive social impact. The third category, 'enablers,' includes products and services that positively impact customer operations environmentally or serve as inputs for sustainable industries, downstream in our value chain. Additionally, our Responsible Investment Policy outlines actions and mechanisms to better identify and manage the impact of our supply chain and downstream operations, reflecting our role as an investment holding company. In 2024, Sabancı Holding surpassed its SDG-linked R&D and innovation target, with 71% of total R&D and innovation spending directed to SDG-linked areas.. Furthermore, we have a pledge to invest a total of USD 5 billion in SDG-linked areas by 2027 and have already fulfilled 28% of this commitment by the end of 2024. For our downstream operations, one of the investee companies, Enerjisa Enerji expects its suppliers to meet minimum standards of good ESG performance, carefully selects the business partners and monitors their compliance with its principles and policies. Enerjisa Enerji fully implemented its Responsible Supply Chain Management System, while Enerjisa Üretim conducted detailed supplier risk mappings and incorporated ESG clauses into all supplier agreements. Another investee company Kordsa, invited 80 suppliers into its annual Sustainability Survey in 2024 and enhanced supplier ESG evaluations. Suppliers from various sectors (i.e. raw materials, service, transport, energy, packaging) were included in this assessment. They assess these suppliers on a global scale based on economic, social and environmental aspects such as energy and emissions management. The magnitude of this strategic impact is considered to be high as sustainable supply chain is a critical element of our business success.

Investment in R&D

(5.3.1.1) Effect type

Select all that apply

☑ Risks

☑ Opportunities

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

Select all that apply

☑ Climate change

☑ Water

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

In 2024, Sabancı Holding continued to prioritize SDG-linked research and development (R&D) and innovation, aligning these efforts with our commitment to sustainable growth and emerging technologies. Sustainability remained a key focus of our innovation strategy, as we enhanced our commitment to SDG-linked R&D to tackle environmental challenges and uncover new growth opportunities. Our investments in sustainable growth platforms aimed to create shared value for stakeholders and contribute to the Sustainable Development Goals (SDGs). We also made strategic investments in emerging technologies, recognizing their potential to disrupt industries and drive sustainable growth. By partnering with innovative startups and ventures, we leveraged the ecosystem's growth potential and fostered collaboration between startups and established enterprises. Additionally, we cultivated a culture of innovation across our organization and portfolio companies, encouraging creativity, experimentation, and cross-functional collaboration. Initiatives like hackathons, innovation challenges, and talent development programs empowered our teams to think boldly and drive significant change in the rapidly evolving business landscape. By staying agile, adaptive, and forward-thinking, we are confident in navigating future challenges and seizing new growth, differentiation, and value creation opportunities. To support our efforts, we invested TRY 833 million to SDG-linked R&D and innovation activities and already surpassed our SDG-linked R&D and innovation investment target with 71% share of SDG-linked spending in total R&D and innovation investments.

Operations

(5.3.1.1) Effect type

Select all that apply

☑ Risks

☑ Opportunities

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

Select all that apply

☑ Climate change

☑ Water

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

We position sustainable business areas such as e-mobility, advanced material technologies, renewable energy generation in our core business lines such as energy, industry and financial services as the next generation growth area of Sabancı Group. Accordingly, one of the key drivers of our Capital Allocation Framework is ESG performance. All of our strategic M&A or investment decisions are guided by our capital allocation framework, which integrates financial returns with long-term

strategic alignment and sustainability criteria. This disciplined approach allows us to preserve value by reinforcing the resilience and efficiency of our operations, while also creating value through future-focused initiatives and innovation-led growth. We conducted a group-wide study to understand key parameters of performance such as the share of sustainability- R&D and the share of revenues from products and services that contribute SDGs in order to determine the Group's position in terms of seizing climate-related opportunities. As an investment holding, our operations include the execution of new investments and our Group companies' investments. As of December 2024, we have completed 28% of our USD 5 billion SDG-linked investment pledge.
[Add row]

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

Row 1

(5.3.2.1) Financial planning elements that have been affected

Select all that apply

☑ Revenues
☑ Direct costs
☑ Access to capital
☑ Capital allocation
☑ Capital expenditures
☑ Acquisitions and divestments

(5.3.2.2) Effect type

Select all that apply

☑ Risks
☑ Opportunities

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

Select all that apply

☑ Climate change

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

Capital Allocation: At the Holding level, capital allocation decisions are guided by ESG performance, including climate-related risks and opportunities. In our 2022-2026 Strategic Plan, we focus on sustainable growth areas like e-mobility, renewable energy, and advanced materials. The Sustainability Director is on the Investment Committee to ensure ESG criteria are integrated into investments and divestments. Group companies, such as Akbank, exemplify this approach; Akbank raised its sustainable loan commitment from 200 billion to TL 800 billion by 2030, exceeding its initial goal, already in 2023. Sabancı Holding's long-term goals include achieving Net Zero Emissions by 2050, with a 42% reduction in Scope 1&2 emissions by 2030 and investing USD 5 billion in SDG-related areas by 2027. Our capital allocation will continue to emphasize ESG performance and GHG trends through 2050. CAPEX: At the Group level, in addition to KPIs to monitor progress on long-term goals y, we monitor CAPEX and OPEX under (1) sustainable investments in our growth areas (including mitigation, transition and enabler investments) (2) environmental expenditures and (3) SDG-linked R&D and innovation investment. During the reporting year, the total amount of all three categories were TRY 7.38billion. Revenues: On top of that, our combined total net sales revenues from products and services that contribute to SDGs were TRY 83 billion during the reporting year (non-bank figures). Direct & Indirect costs: Due to investments related with our circular economy and low carbon technology investments we have saved nearly TRY 2.2 billion in 2024; utilizing alternative fuels, energy efficiency measures, using less or alternative resources leads to increase in profit. Access to capital: Integration of climate-related risks and opportunities into business brings advantage to different Group companies in terms of diversifying sources of finance, ensuring lower cost of debt (green loans, similar funding opportunities like Horizon Europe) and lower cost of capital. Acquisitions and divestments: All strategic M&A and investment decisions follow our capital allocation framework, integrating financial returns with long-term alignment and sustainability. This approach preserves value, strengthens resilience, and drives innovation-led growth, while ESG due diligence ensures responsible and sustainable value creation.

Row 2

(5.3.2.1) Financial planning elements that have been affected

Select all that apply

☑ Direct costs

☑ Capital expenditures

(5.3.2.2) Effect type

Select all that apply

☑ Risks

☑ Opportunities

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

Select all that apply

☑ Water

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

Our investee companies, i.e. Group companies, develop sustainable products, services, and business models, commit to TRY 200 billion in sustainable financing by 2030 (already realized TRY 416billion and raised the commitment to TRY 800 billion). Being aware of the impacts of water supply disruption, we launched a comprehensive water project across the Group in 2023 and defined water-related targets for existing assets including reducing freshwater withdrawal of the 2024 portfolio by 10% and water consumption by 15% by 2030 and integrating water management into investment due diligence processes and prioritizing efficiency improvements after acquisition. Sabancı Holding has a planned budget of USD 5 billion for SDG-related Capex & Opex investments, the majority of which are directly related to climate and water-related areas, between 2022 and 2027. By the end of 2027, at least 70% of this investment amount will be allocated to climate mitigation and adaptation and associated investments like water.
[Add row]

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

	Use of internal pricing of environmental externalities	Environmental externality priced
	Select from: ☑ Yes	*Select all that apply* ☑ Carbon ☑ Water

[Fixed row]

(5.10.1) Provide details of your organization's internal price on carbon.

Row 1

(5.10.1.1) Type of pricing scheme

Select from:
☑ Shadow price

(5.10.1.2) Objectives for implementing internal price

Select all that apply

☑ Identify and evaluate financing opportunities

☑ Identify and seize low-carbon opportunities

(5.10.1.3) Factors considered when determining the price

Select all that apply

☑ Alignment to scientific guidance

☑ Alignment with the price of allowances under an Emissions Trading Scheme

☑ Scenario analysis

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

We used a carbon corridor to estimate the annual cost of carbon. To forecast future Türkiye ETS, carbon prices in the absence of the market and historical data, Sabancı Holding has undertaken several analyses with the support of a consultant relying on considerations from current Türkiye context, lessons learned from other ETS launched globally potential linkage to EU CBAM and input from carbon pricing databases of the NFGS, IEA, IIASA for below 2-degree scenario.

(5.10.1.5) Scopes covered

Select all that apply

☑ Scope 1

(5.10.1.6) Pricing approach used – spatial variance

Select from:

☑ Uniform

(5.10.1.8) Pricing approach used – temporal variance

Select from:

☑ Evolutionary

(5.10.1.9) Indicate how you expect the price to change over time

Sabancı Holding applies an internal carbon price in its decision-making processes, in line with its climate change mitigation and low-carbon transition objectives. This approach is intended to reflect the financial impacts of climate-related factors, particularly in investment evaluations and risk analyses. The internal carbon price has been established based on Türkiye's ETS and international ETS scenarios. Accordingly, the internal carbon price range is projected to be between USD 8 and USD 12 by 2030.

(5.10.1.10) Minimum actual price used (currency per metric ton CO2e)

262

(5.10.1.11) Maximum actual price used (currency per metric ton CO2e)

393

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

Select all that apply

☑ Capital expenditure

☑ Operations

☑ Product and R&D

☑ Risk management

☑ Opportunity management

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

Select from:

☑ Yes, for some decision-making processes, please specify :Sabancı Holding integrates carbon pricing into decision-making for operations and investments, ensuring it influences project evaluations, cost assessments, capital allocation decisions, and mitigation strategies across its subsidiaries.

(5.10.1.14) % total emissions in the reporting year in selected scopes this internal price covers

100

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

Select from:

☑ Yes

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

Sabancı Holding takes into account the price of carbon for risk management purposes in its new and existing investments. This method drives capital allocation decisions at the Holding level as well as the mitigation measures across investee companies.
[Add row]

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

Row 1

(5.10.2.1) Type of pricing scheme

Select from:
☑ Shadow price

(5.10.2.2) Objectives for implementing internal price

Select all that apply
☑ Use an internal price for corporate engagement/stewardship purposes
☑ Other, please specify :Anticipated water tariffs, existing water tariffs, and scenario analysis

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

Select from:
☑ Yes

(5.10.2.4) Factors considered when determining the price

Select all that apply
☑ Cost of required measures to achieve water-related targets

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

The current internal water pricing was determined based on the current water tariff and future water tariff projections. Starting from the second quarter of 2024, water prices for İSKİ in Istanbul have gone up by 50%, and it's likely that they will continue to rise in the coming years. There is also scope for price increases in other regions. Moreover, it is important to note that Sabancı Holding's portfolio includes companies operating across various sectors, and an internal water pricing mechanism is applied. In this analysis, internal water price of one of our group companies is shared as an example. A forecast analysis of internal water pricing in 2030 and 2050 has been conducted based on water stress impact.

(5.10.2.6) Stages of the value chain covered

Select all that apply

☑ Portfolio

(5.10.2.7) Pricing approach used – spatial variance

Select from:

☑ Uniform

(5.10.2.9) Pricing approach used – temporal variance

Select from:

☑ Evolutionary

(5.10.2.10) Indicate how you expect the price to change over time

To account for the uncertainty of such estimations, upper and lower bounds for each time horizon and scenario are assumed: • Lower bound: No increase in water price, resulting in no additional costs compared to the current situation. • Upper bound: In a worst-case scenario, water stress triggers stronger governmental actions, leading to the assumption of a 50% increase in water prices across all regions and time horizons. Based on the water stress impact, a forecast analysis of internal water pricing for 2030 and 2050 has been conducted.

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

90

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

135

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

Select all that apply

☑ Capital expenditure

☑ Risk management

☑ Opportunity management

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

Select from:

☑ Yes, for some decision-making processes, please specify :risk and opportunity management

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

Select from:

☑ Yes

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

An internal price on water is implemented to reflect its true value and to encourage efficient usage across all operations. The environmental cost of water extraction and treatment, along with potential risks posed by water scarcity, are factored into this pricing approach. To ensure alignment with sustainability objectives, water usage is monitored through regular audits, and the financial and environmental impacts of consumption patterns are assessed. Water meters are being monitored more precisely alongside digitization investments, and consumption optimizations are structured based on this data. For our existing assets, we have set a clear water roadmap: we aim to reduce the freshwater withdrawal of our 2024 portfolio by 10% and water consumption of 2024 portfolio by 15% by 2030. In addition, we integrate water management into investment due diligence processes and prioritize efficiency improvements after acquisitions.
[Add row]

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

	Engaging with this stakeholder on environmental issues	Environmental issues covered
Investees	*Select from:* ☑ Yes	*Select all that apply*
Suppliers	*Select from:* ☑ Yes	*Select all that apply* ☑ Climate change ☑ Water
Investors and shareholders	*Select from:* ☑ Yes	*Select all that apply* ☑ Climate change ☑ Water
Other value chain stakeholders	*Select from:* ☑ Yes	*Select all that apply* ☑ Climate change ☑ Water

[Fixed row]

(5.11.4) Provide details of your environmental engagement strategy with your investees.

Row 1

(5.11.4.1) Environmental issues covered by the engagement strategy

Select all that apply

☑ Climate change

(5.11.4.2) Type and details of engagement

Capacity building

☑ Provide training, support, and best practices on how to make credible renewable energy usage claims

☑ Provide training, support, and best practices on how to measure GHG emissions
☑ Provide training, support, and best practices on how to set science-based targets
☑ Support investees to develop public time-bound action plans with clear milestones
☑ Support investees to set their own environmental commitments across their operations

Information collection
☑ Collect climate transition plan information at least annually from investees
☑ Collect environmental risk and opportunity information at least annually from investees
☑ Collect GHG emissions data at least annually from investees
☑ Collect targets information at least annually from investees

Innovation and collaboration
☑ Collaborate with investees on innovations to reduce environmental impacts in products and services
☑ Collaborate with investees on innovative business models and corporate renewable energy sourcing mechanisms
☑ Engage with investees to advocate for policy or regulatory change to address environmental challenges
☑ Run a campaign to encourage innovation to reduce environmental impacts on products and services

(5.11.4.3) % of scope 3 investees associated emissions as reported in 12.1.1/12.1.3

Select from:
☑ 100%

(5.11.4.5) % of investing (Asset owners) portfolio covered in relation to total portfolio value

Select from:
☑ 100%

(5.11.4.6) Explain the rationale for the coverage of your engagement

Engagement targeted at investees with the highest potential impact on the climate.

(5.11.4.7) Describe how you communicate your engagement strategy to your investees and/or to the public

The Sustainability Directorate is a key driver of the Holding's sustainability efforts, facilitating connections between the Board Sustainability Committee, the Sustainability Leadership Committee, and the Thematic Task Forces. It is responsible for coordinating meetings, selecting discussion topics, and inviting relevant stakeholders to ensure comprehensive engagement. The Directorate collaborates closely with senior management and key stakeholders to embed sustainability principles into corporate strategy. It conducts thorough assessments to identify material sustainability issues relevant to operations, industry, and stakeholders, and establishes clear and measurable sustainability targets in areas such as carbon emissions reduction, resource efficiency, diversity and inclusion, and community engagement. By recognizing the interconnected nature of sustainability challenges, the Directorate works with international organizations, industry peers, and multi-stakeholder initiatives to exchange best practices, advocate for policy change, and drive collective action on global issues such as climate change, human rights, and supply chain sustainability. It also raises awareness among employees and empowers them to contribute to sustainability goals through training programs, internal communications, and engagement initiatives. The Directorate is responsible for managing communication with all investee companies through Thematic Task Force meetings. Furthermore, the activities of the Thematic Task Force and other engagement committees are disclosed to the public and external stakeholders via the annual sustainability report. By taking a proactive and strategic approach to sustainability planning, the Sustainability Directorate helps the Holding navigate complexity, manage risks, and seize opportunities for innovation and growth while creating value for all stakeholders.

(5.11.4.8) Attach your engagement strategy

Sabanci-Holding-Sustainability-2024-Report.pdf

(5.11.4.9) Staff in your organization carrying out the engagement

Select all that apply

☑ Specialized in-house engagement teams

(5.11.4.10) Roles of individuals at the portfolio organizations you seek to engage with

Select all that apply

☑ Other, please specify :Holding collaborates with investee companies' sustainability and other teams to align and implement environmental strategies effectively within their governance structure.

(5.11.4.11) Effect of engagement, including measures of success

Sabancı Holding's revenues depend on the business continuity of the companies in its portfolio. Therefore, it is important for Sabancı Holding to request the best available technologies and ESG risk mitigation approaches globally from its investee companies. The Holding monitors environmental investments, environmental expenditures, and revenues from SDG-linked products and services in investee companies by breaking them down based on global and local approaches, such as EU Taxonomy, and reports publicly all steps taken towards mitigating the climate emergency. In order to achieve its climate related targets, Sabancı Holding requests investee companies' strategies to be aligned with Holding's strategies, i.e. for climate; 1.5 degrees scenario. Accordingly, the Holding engages with the investee companies regarding setting science-based emission reduction targets. This is applied to all investee companies that operate in relevant sectors. That makes 100% of portfolio coverage. In 2020, none of the investee companies were engaged with SBTi. In 2021, one of the companies has set targets. Currently, 7 investee

companies have already set or were in the process of setting science-based targets. Therefore, the measure of success is the number of investee companies engaged with SBTi. The value has increased from 0 in 2020 to 7 in 2024. Additionally, 100% of investees have adopted Net Zero Emissions goal by 2050. Following Sabancı Holding's engagement with Group companies on key nature-related themes, decarbonization, water management, biodiversity, and circular economy, several Group companies established their own circularity and water targets and initiated biodiversity activities in addition to the portfolio-level targets set at the Holding level. This demonstrates that the engagement served as a catalyst for target-setting and implementation processes across the Group, with success measured by the integration of company-specific targets and actions aligned with Sabancı Holding's Nature Agenda.

(5.11.4.12) Escalation process for engagement when dialogue is failing

Select from:

☑ Yes, we have an escalation process

(5.11.4.13) Describe your escalation process

The Sabancı Business Units (SBU) presidents of the Holding also serve as board members of the respective group companies. If any engagement dialogue fails, the Holding Directorate can escalate the issue by communicating with the relevant SBU president through the Sustainability Leadership Committee or bilateral meetings.

Row 2

(5.11.4.1) Environmental issues covered by the engagement strategy

Select all that apply

☑ Water

(5.11.4.2) Type and details of engagement

Capacity building

☑ Support investees to set their own environmental commitments across their operations

Information collection

☑ Collect environmental risk and opportunity information at least annually from investees

☑ Collect GHG emissions data at least annually from investees

☑ Collect targets information at least annually from investees

☑ Collect water quantity information at least annually from Investees (e.g., withdrawal and discharge volumes)

Innovation and collaboration

☑ Collaborate with investees on innovations to reduce environmental impacts in products and services

(5.11.4.5) % of investing (Asset owners) portfolio covered in relation to total portfolio value

Select from:

☑ 100%

(5.11.4.6) Explain the rationale for the coverage of your engagement

Engagement targeted at investees with the highest potential impact on the water.

(5.11.4.7) Describe how you communicate your engagement strategy to your investees and/or to the public

The Sustainability Directorate is a key driver of the Holding's sustainability efforts, facilitating connections between the Board Sustainability Committee, the Sustainability Leadership Committee, and the Thematic Task Forces. It is responsible for coordinating meetings, selecting discussion topics, and inviting relevant stakeholders to ensure comprehensive engagement. The Directorate collaborates closely with senior management and key stakeholders to embed sustainability principles into corporate strategy. It conducts thorough assessments to identify material sustainability issues relevant to operations, industry, and stakeholders, and establishes clear and measurable sustainability targets in areas such as carbon emissions reduction, resource efficiency, diversity and inclusion, and community engagement. By recognizing the interconnected nature of sustainability challenges, the Directorate works with international organizations, industry peers, and multi-stakeholder initiatives to exchange best practices, advocate for policy change, and drive collective action on global issues such as climate change, human rights, and supply chain sustainability. It also raises awareness among employees and empowers them to contribute to sustainability goals through training programs, internal communications, and engagement initiatives. The Directorate is responsible for managing communication with all investee companies through Thematic Task Force meetings. Furthermore, the activities of the Thematic Task Force and other engagement committees are disclosed to the public and external stakeholders via the annual sustainability report. By taking a proactive and strategic approach to sustainability planning, the Sustainability Directorate helps the Holding navigate complexity, manage risks, and seize opportunities for innovation and growth while creating value for all stakeholders.

(5.11.4.8) Attach your engagement strategy

Sabanci-Holding-Sustainability-2024-Report.pdf

(5.11.4.9) Staff in your organization carrying out the engagement

Select all that apply

☑ Specialized in-house engagement teams

(5.11.4.10) Roles of individuals at the portfolio organizations you seek to engage with

Select all that apply

☑ Other, please specify :Holding collaborates with investee companies' sustainability teams to align and implement environmental strategies effectively within their governance structure.

(5.11.4.11) Effect of engagement, including measures of success

Sabancı Holding recognizes that the continuity of its portfolio companies is vital to its revenue. As such, it is crucial for Holding to ensure that its investee companies adopt the best available technologies and global ESG risk mitigation approaches. The Holding closely monitors environmental investments and the revenues generated from products and services in these companies and publicly reports all steps taken to address water security. To proactively address water-related risks and strengthen Group-wide water management practices, Sabancı Holding completed a comprehensive water stewardship project, establishing consistent definitions, methodologies, and performance metrics across all Group companies in alignment with sector-specific water realities. For existing assets, a roadmap has been defined, which includes reducing freshwater withdrawal of the 2024 portfolio by 10% and water consumption by 15% by 2030, as well as integrating water management into investment due diligence processes and prioritizing efficiency improvements after acquisitions.

(5.11.4.12) Escalation process for engagement when dialogue is failing

Select from:

☑ Yes, we have an escalation process

(5.11.4.13) Describe your escalation process

The Sabancı Business Units (SBU) presidents of the Holding also serve as board members of the respective group companies. If any engagement dialogue fails, the Holding Directorate can escalate the issue by communicating with the relevant SBU president through the Sustainability Leadership Committee or bilateral meetings. [Add row]

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

Climate change

(5.11.7.2) Action driven by supplier engagement

Select from:

☑ Adaptation to climate change

(5.11.7.3) Type and details of engagement

Innovation and collaboration

☑ Engage with suppliers to advocate for policy or regulatory change to address environmental challenges

(5.11.7.4) Upstream value chain coverage

Select all that apply

☑ Tier 1 suppliers

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

Select from:

☑ 100%

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

Select from:

☑ 100%

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

As an investment holding company, our direct supplier interactions are relatively limited, focusing primarily on basic services such as catering, cleaning, and employee commuting. The core value of our holding lies in our investments and the companies within our portfolio. Nevertheless, we maintain environmental standards with our direct suppliers. We formalize our relationships through contracts that are monitored via internal and external audits. These contracts incorporate environmental management systems as a key criterion and mandate compliance with environmental regulations. We regularly monitor the performance of our suppliers, with environmental management being a critical aspect of their performance metrics. This ensures that our direct suppliers adhere to high environmental standards, contributing to our overall sustainability goals. Each supplier of the Holding is subject to regular internal audits, conducted with specific criteria that include compliance with environmental laws and standards.

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

Select from:

☑ Yes

Water

(5.11.7.2) Action driven by supplier engagement

Select from:

☑ Provision of fully-functioning, safely managed WASH services to all employees

(5.11.7.3) Type and details of engagement

Information collection

☑ Collect WASH information at least annually from suppliers

☑ Collect water quality information at least annually from suppliers (e.g., discharge quality, pollution incidents, hazardous substances)

☑ Collect water quantity information at least annually from suppliers (e.g., withdrawal and discharge volumes)

☑ Other information collection activity, please specify :(water management information at least annually from suppliers)

Innovation and collaboration

☑ Engage with suppliers to advocate for policy or regulatory change to address environmental challenges

(5.11.7.4) Upstream value chain coverage

Select all that apply

☑ Tier 1 suppliers

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

Select from:

☑ 100%

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

Please note that Sabancı Holding has a diverse portfolio with companies operating across various sectors, and this explanation is provided as an example of our engagement process within the portfolio. Metrics used to measure the success: CarrefourSA considers suppliers to have substantive dependencies when operations are located in high water-stress basins, identified via WRI Aqueduct. Suppliers are also classified as dependent if production requires significant water use for processing or irrigation. Substantive impacts are assigned where sourcing practices risk reducing local water availability or affect shared watershed resilience. Among

our private label food suppliers, those with minimum 1% purchasing share suppliers considered material for CarrefourSA. Based on the assessment of 27 such suppliers by location, 81% were found to be operating under high or very high water stress. Water-related outcomes of engagement activities: By monitoring and evaluating water usage in the supply chain, CarrefourSA can identify areas of high consumption and work with suppliers to implement water-saving measures. This can help conserve water resources and reduce overall water consumption, contributing to sustainable water management. In addition, engaging with suppliers allows CarrefourSA to assess the potential risks associated with water scarcity or water-related disruptions in the supply chain. By identifying vulnerable areas and collaborating with suppliers on risk mitigation strategies, the Company can minimize the impact of water-related risks on its operations. Moreover, engaging with suppliers on water management fosters collaboration and knowledge sharing. Through these interactions, CarrefourSA can exchange best practices, innovative solutions, and lead to continuous improvement in water management across the supply chain.

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

Select from:

☑ Yes, please specify the environmental requirement :Provision of fully-functioning, safely managed WASH services to all employees

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

Select from:

☑ Yes

[Add row]

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

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☑ Other value chain stakeholder, please specify :Business associations

(5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Share information about your products and relevant certification schemes

☑ Share information on environmental initiatives, progress and achievements

Innovation and collaboration

☑ Collaborate with stakeholders on innovations to reduce environmental impacts in products and services

☑ Engage with stakeholders to advocate for policy or regulatory change

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

☑ None

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

TÜSİAD is a voluntary business organization formed by Türkiye's leading entrepreneurs and business world managers. TÜSİAD, as the organizations represented by its members, has an important representation ability in the Turkish economy in areas such as production, added value, registered employment and foreign trade. TÜSİAD has been a member of the European Business Confederation (Business Europe), the umbrella organization considered as the representative of the European private sector. Its members represent nearly 4,500 companies. Sabancı Holding actively supports TÜSİAD through regular participation in meetings and collaborations under Chapter Zero Türkiye. In 2024, Sabancı Holding hosted two high-level roundtable meetings. The first, held in March, focused on green transformation leadership and was moderated by Sabancı Holding Human Capital and Sustainability Group President, Yeşim Özlale Önen. The second, organized in December with the participation of ISSB Chair Emmanuel Faber, was moderated by Sabancı Holding Financial Group President, N. Orhun Köstem, and addressed the role of CFOs in corporate sustainability reporting and the implementation of ISSB standards in Türkiye. These initiatives demonstrate Sabancı Holding's active role in fostering climate governance and advancing sustainable business practices at the national and international level. Sabancı Group has a leading position on climate and environmental pillars.

(5.11.9.6) Effect of engagement and measures of success

We are supporting the actions in favorite of developing a low-carbon economy in Türkiye. Until the first phases of PMR, which is known as MRV 1 and MRV 2 phases; both the Sabancı Group companies and their experienced experts voluntarily contributes to the projects by attending numerous meetings, developing countless presentations and providing feedback to the authorities. The government organized a Climate Council and Sabancı Holding, and its companies were involved in the high-level decisions taken for the Roadmap of the Country in terms of low carbon and climate resilient economy. Before the meetings took place the Group companies had the chance to send their opinions and recommendations to the Secretariat. The results of these series of meetings will be used for Climate Law and other strategies towards a low carbon country.

Water

(5.11.9.1) Type of stakeholder

Select from:

☑ Other value chain stakeholder, please specify :Entrepreneurs

(5.11.9.2) Type and details of engagement

Innovation and collaboration

☑ Collaborate with stakeholders on innovations to reduce environmental impacts in products and services

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

As Sabancı Group, we expect our companies to go beyond legal obligations and implement the best environmental solutions, support initiatives that contribute to the development and dissemination of environmentally friendly technologies and promote environmental awareness. We strive to fulfill our social and environmental responsibilities towards society in all the geographies where we operate, in collaboration with our shareholders, employees, the public, civil society organizations, and other stakeholders. We have established the Sabancı ARF program, through which we support entrepreneurs. The aim of this program is to foster open innovation and provide support, both in terms of mentorship and structural assistance, as well as seed funding, to entrepreneurs who are developing new ideas/technologies in the fields of energy, climate and water technologies, advanced materials technologies, digital technologies, and healthcare technologies. Over the course of a 20-week period, the provided budget is expected to help entrepreneurs succeed in their product/service development experiments, create a product/service prototype, and establish their first customer connection. One of the ventures selected for this program and successfully completing its prototype is Blueit which is a hardware and software solution that builds a "Water Management System" that monitors and optimizes real-time water consumption in buildings.

(5.11.9.6) Effect of engagement and measures of success

One of the customers of this project that we support within the scope of ARF is Brisa, our group company operating in the automotive sector with high water usage. This system offers users a five-step process. The first step is measurement. Data from water meters within the facility is directly transmitted and processed in the cloud. In the second step, analysis, energy consumption and carbon emissions resulting from water usage are analyzed. A trend analysis of water, along with flow diagrams within the facility, is conducted. In case of anomalies, the user is promptly notified. The third step, reporting, allows for the calculation of carbon and water footprints in compliance with ISO standards. All this data and analysis are presented to the user through daily, weekly, monthly, and retrospective reports. The fourth step is planning. Artificial intelligence provides future water usage predictions and supports the creation of a water action plan. This enables the user to establish a water budget and usage plan. The final step is improvement. In this stage, the program assists in water usage reduction through effective water management and AI-driven savings recommendations. Success Criterion: This project is expected to have an accelerating effect on Brisa's goal of improving its water data tracking system and reducing water usage/increasing water efficiency through real-time monitoring.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☑ Investors and shareholders

(5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Share information about your products and relevant certification schemes

☑ Share information on environmental initiatives, progress and achievements

Innovation and collaboration

☑ Collaborate with stakeholders on innovations to reduce environmental impacts in products and services

☑ Engage with stakeholders to advocate for policy or regulatory change

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

☑ None

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

Sabancı Holding sets and monitors the investor relations and corporate governance practices that apply across Sabancı Group. Sabancı Holding's stakeholder engagement philosophy is centered around maintaining communication to ensure clear, comprehensive, and consistent dialogue with the investment community in a timely and transparent manner. Communication with investors and shareholders occurs through various platforms, including investor meetings, conferences, roadshows, SBU day meetings, analyst day meetings, ESG day meetings, corporate and IR websites, annual reports, and sustainability reports. This engagement not only helps us understand investor sentiment but also allows us to inform management about the Group's performance, strategic moves, and potential market reactions to stock price-sensitive actions.

(5.11.9.6) Effect of engagement and measures of success

As Sabancı Holding, we ensure alignment with our stakeholders' priorities and foster strong, transparent relationships through collaboration and effective communication. We align our priorities with those of our stakeholders, which include our financial performance, sustainability performance, future targets, and responsible investment approach, which are also considered key measures of engagement success. Through these engagements, we not only create value for our shareholders but also contribute to building a resilient and thriving global society for future generations.

Water

(5.11.9.1) Type of stakeholder

Select from:

☑ Investors and shareholders

(5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Share information about your products and relevant certification schemes

☑ Share information on environmental initiatives, progress and achievements

Innovation and collaboration

☑ Collaborate with stakeholders on innovations to reduce environmental impacts in products and services

☑ Engage with stakeholders to advocate for policy or regulatory change

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

Sabancı Holding sets and monitors the investor relations and corporate governance practices that apply across Sabancı Group. Sabancı Holding's stakeholder engagement philosophy is centered around maintaining communication to ensure clear, comprehensive, and consistent dialogue with the investment community in a timely and transparent manner. Communication with investors and shareholders occurs through various platforms, including investor meetings, conferences, roadshows, SBU day meetings, analyst day meetings, ESG day meetings, corporate and IR websites, annual reports, and sustainability reports. This engagement not only helps us understand investor sentiment but also allows us to inform management about the Group's performance, strategic moves, and potential market reactions to stock price-sensitive actions.

(5.11.9.6) Effect of engagement and measures of success

As Sabancı Holding, we ensure alignment with our stakeholders' priorities and foster strong, transparent relationships through collaboration and effective communication. We align our priorities with those of our stakeholders, which include our financial performance, sustainability performance, future targets, and responsible investment approach, which are also considered key measures of engagement success. Through these engagements, we not only create value for our shareholders but also contribute to building a resilient and thriving global society for future generations.
[Add row]

(5.14) Do your external asset managers have to meet environmental requirements as part of your organization's selection process and engagement?

	External asset managers have to meet specific environmental requirements as part of the selection process and engagement
	Select from: ☑ Not applicable, because we do not have externally managed assets

[Fixed row]

(5.15) Does your organization exercise voting rights as a shareholder on environmental issues?

(5.15.1) Exercise voting rights as a shareholder on environmental issues

Select from:

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

(5.15.2) Primary reason for not exercising voting rights as a shareholder on environmental issues

Select from:

☑ Other, please specify :"Say on Climate" is exercised in ways other than voting

(5.15.3) Explain why you do not exercise voting rights on environmental issues

Our investee companies open the annual report for negotiation at ordinary general meetings every year and get the opinions of their shareholders including Sabancı Holding. The annual report also includes an important section on sustainability. The sustainability compliance report of the CMB is also included in the annual report. Therefore, we use our right to "say on climate" as Sabancı Holding in the agenda item related to the negotiation of the annual report in the agenda of the ordinary general assembly meeting every year. On the other hand, there is no voting on this agenda item, only information and discussion.
[Fixed row]

C6. Environmental Performance - Consolidation Approach

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

Climate change

(6.1.1) Consolidation approach used

Select from:

☑ Equity share

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

Sabancı Holding has adjusted its consolidation approach to align with the equity share method in 2022 reporting year, reflecting its strategic investment holding structure. Previously, GHG inventory was accounted for using the operational control approach. Starting from the 2022 reporting year, the equity share approach was adopted as it more accurately represents the relationship between investee companies and Sabancı Holding's operations. This method continues to be applied for the 2024 reporting year, with emission figures are verified by an independent auditor.

Water

(6.1.1) Consolidation approach used

Select from:

☑ Equity share

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

Sabancı Holding has adjusted its consolidation approach for both GHG emissions and water figures to align with the equity share method in 2022 reporting year, reflecting its strategic investment holding structure. Previously, GHG inventory and water figures including withdrawal, consumption and discharge was accounted for using the operational control approach. Starting from the 2022 reporting year, the equity share approach was adopted as it more accurately represents the relationship between investee companies and Sabancı Holding's operations. This method continues to be applied for the 2024 reporting year, with emission and water figures are verified by an independent auditor.

Plastics

(6.1.1) Consolidation approach used

Select from:

☑ Equity share

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

The consolidation approach for all environmental issues, specifically plastics, aligns with the the general consolidation approach of Sabancı Holding, which adjusted its method to align with the equity share method in 2022 reporting year, reflecting its strategic investment holding structure. Previously, the GHG inventory was accounted for using the operational control approach. Starting from the 2022 reporting year, the equity share approach was adopted as it more accurately represents the relationship between investee companies and Sabancı Holding's operations.

Biodiversity

(6.1.1) Consolidation approach used

Select from:

☑ Equity share

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

The consolidation approach for all environmental issues, specifically biodiversity, aligns with the general consolidation approach of Sabancı Holding, which adjusted its method to align with the equity share method in 2022 reporting year, reflecting its strategic investment holding structure. Previously, the GHG inventory was accounted for using the operational control approach. Starting from the 2022 reporting year, the equity share approach was adopted as it more accurately represents the relationship between investee companies and Sabancı Holding's operations.
[Fixed row]

C7. Environmental performance - Climate Change

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

Select from:
☑ No

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

	Has there been a structural change?
	Select all that apply ☑ No

[Fixed row]

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

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

Select all that apply
☑ Yes, a change in boundary

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

As of 31 December 2024, Sabancı Holding expanded its reporting boundaries to include global activities, whereas previously the reporting scope covered only operations in Türkiye.
[Fixed row]

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

(7.1.3.1) Base year recalculation

Select from:

☑ No, because the impact does not meet our significance threshold

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

Adjustment of the base year emissions is evaluated based on the magnitude of the changes. In line with the Science Based Targets initiative (SBTi), a change is considered significant if it affects 5% or more of the total GHG emissions. This approach aligns with the GHG Protocol's guidance on maintaining accuracy and consistency in greenhouse gas accounting. Accordingly, Sabancı Holding applies this 5% significance threshold in the absence of more specific guidance from other international standards. Therefore, if the changes described above result in a 5% or greater increase or decrease in base year emissions, the base year is recalculated to reflect these adjustments. Based on this approach, we did not recalculate the base year emissions, as the impact of the change in boundary remained below the 5% significance threshold in relation to our total emissions.

(7.1.3.4) Past years' recalculation

Select from:

☑ No
[Fixed row]

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

Select all that apply

☑ ISO 14064-1

☑ The Greenhouse Gas Protocol: Scope 2 Guidance
☑ US EPA Emissions & Generation Resource Integrated Database (eGRID)
☑ The Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Standard
☑ 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories
☑ The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)
☑ US EPA Center for Corporate Climate Leadership: Indirect Emissions From Events and Conferences
☑ Defra Environmental Reporting Guidelines: Including streamlined energy and carbon reporting guidance, 2019

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

	Scope 2, location-based	Scope 2, market-based	Comment
	Select from: ☑ We are reporting a Scope 2, location-based figure	*Select from:* ☑ We are reporting a Scope 2, market-based figure	*We are reporting both location-based and market-based figure.*

[Fixed row]

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

Select from:
☑ No

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

Scope 1

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

9977577.95

(7.5.3) Methodological details

The Scope 1 emissions are calculated for all relevant emissions originating from the direct operations of Sabancı Holding and our portfolio companies, based on equity share approach from GHG protocol.

Scope 2 (location-based)

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

1227675.4

(7.5.3) Methodological details

The Scope 2 emissions are calculated by multiplying the amount of purchased electricity, and the national inventory emission factors for electricity production. The purchased electricity data is considered for the Holding and the portfolio companies, based on equity share approach from GHG protocol.

Scope 2 (market-based)

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

1227675.4

(7.5.3) Methodological details

Since Sabancı Holding reports both location-based and market-based emissions, it is disclosed the use of market-based instruments when applicable, which was not the practice in 2021.

Scope 3 category 1: Purchased goods and services

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

10.04

(7.5.3) Methodological details

According to our equity share approach, we only disclose the Holding's emissions that fall under this category. Moreover, the total figure of CO2e is negligible for the Holding compared to Category 15 Scope 3 emissions of the Holding, yet it is still calculated. We included single use plastic consumption, paper and water use as mainstream parameters which are relatively feasible to track compared to other indirect emission sources. For that reason, we collect water, paper and plastic data from the Holding. The amount of single use plastic consumption in 2021 is 1 ton which equals to 3.12 tCO2e. The amount of water in 2021 is 10,881 m3 of water which equals to 1.62 tCO2e. The amount of paper in 2021 is 6 tons of paper which equals to 5.30 tCO2e.

Scope 3 category 2: Capital goods

(7.5.3) Methodological details

This report is drafted on behalf of Hacı Ömer Sabancı Holding A.Ş., the parent company of Sabancı Group. As an investment Holding, our business activity can be defined as the management of Group companies (i.e. investees) with a strategic approach. Since there is no manufacturing activities nor a large-scale service/operation at the Holding, calculating capital goods-related Scope 3 is not relevant nor feasible for us, instead of the case for our investees.

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

(7.5.3) Methodological details

We consider all the fuel-and-energy-related activities under our Scope 1 and Scope 2 emissions. Therefore, fuel-and-energy-related activities (not included in Scope 1 or 2) is not relevant for us.

Scope 3 category 4: Upstream transportation and distribution

(7.5.3) Methodological details

This report is drafted on behalf of Hacı Ömer Sabancı Holding A.Ş., the parent company of Sabancı Group. As an investment Holding, our business activity can be defined as the management of Group companies (i.e. investees) with a strategic approach. Since there is no manufacturing activities nor a large-scale service/operation at the Holding, calculating upstream transportation and distribution related Scope 3 is not relevant nor feasible for us, instead of the case for our investees.

Scope 3 category 5: Waste generated in operations

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

315.55

(7.5.3) Methodological details

We used to calculate this category emissions for our investee companies. However, since we changed our consolidation approach and that our investee companies' Scope 3 emissions are not relevant under the newly used equity share approach, we are not including our investee companies' Scope 3 emissions under this Category anymore (instead, we disclose Cat 15 emissions). Accordingly, we only disclose the Holding's emissions that fall under this category. Moreover, the total figure of CO2e is negligible for the Holding compared to Category 15 Scope 3 emissions of the Holding, yet it is still calculated. In the calculation of emissions arising from waste generation, non-hazardous waste as well as wastewater treatment are taken into account. The total amount of non-hazardous waste and wastewater are 14.7 tons and 7.4 tons respectively. GHG emissions originating from our non-hazardous waste and wastewater are calculated as 313,54 and 2.01 tCO2e, respectively. The sum of emissions in this category is 315.55 tCO2e.

Scope 3 category 6: Business travel

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

17.64

(7.5.3) Methodological details

We used to calculate this category emissions for our investee companies. However, since we changed our consolidation approach and that our investee companies' Scope 3 emissions are not relevant under the newly used equity share approach, we are not including our investee companies' Scope 3 emissions under this Category anymore (instead, we disclose Cat 15 emissions). Accordingly, we only disclose the Holding's emissions that fall under this category. Moreover, the total figure of CO2e is negligible for the Holding compared to Category 15 Scope 3 emissions of the Holding, yet it is still calculated. In 2021, Sabancı employees' travel distance is all multiplied by standard flight emission factors, total business travel emissions of Holding was 17,64 tCO2e in 2021.

Scope 3 category 7: Employee commuting

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

3.86

(7.5.3) Methodological details

We used to calculate this category emissions for our investee companies. However, since we changed our consolidation approach and that our investee companies' Scope 3 emissions are not relevant under the newly used equity share approach, we are not including our investee companies' Scope 3 emissions under this Category anymore (instead, we disclose Cat 15 emissions). Accordingly, we only disclose the Holding's emissions that fall under this category. Moreover, the total figure of CO2e is negligible for the Holding compared to Category 15 Scope 3 emissions of the Holding, yet it is still calculated. We provide employee commuting for the wellbeing of our employees and also to decrease the overall GHG emissions according to travel by car to business facilities. The amount of emissions originating from employee commuting (personnel service use by employees) have been covered. In 2021, the total distance travelled in terms of employee commuting is multiplied with emissions factors to calculate tCO2e, which is 3.86.

Scope 3 category 8: Upstream leased assets

(7.5.3) Methodological details

This report is drafted on behalf of Hacı Ömer Sabancı Holding A.Ş., the parent company of Sabancı Group. As a Holding company, our business activity can be defined as the management of Group companies (i.e. investees) with a strategic approach. Since there is no manufacturing activities nor a large-scale service/operation at the Holding, calculating upstream leased assets-related Scope 3 is not relevant nor feasible for us, instead of the case for our investees.

Scope 3 category 9: Downstream transportation and distribution

(7.5.3) Methodological details

This report is drafted on behalf of Hacı Ömer Sabancı Holding A.Ş., the parent company of Sabancı Group. As a Holding company, our business activity can be defined as the management of Group companies (i.e. investees) with a strategic approach. Since there is no manufacturing activities nor a large-scale service/operation at the Holding, calculating downstream transportation and distribution-related Scope 3 is not relevant nor feasible for us, instead of the case for our investees.

Scope 3 category 10: Processing of sold products

(7.5.3) Methodological details

This report is drafted on behalf of Hacı Ömer Sabancı Holding A.Ş., the parent company of Sabancı Group. As a Holding company, our business activity can be defined as the management of Group companies (i.e. investees) with a strategic approach. Since there is no manufacturing activities nor a large-scale service/operation at the Holding, calculating processing of sold products-related Scope 3 is not relevant nor feasible for us, instead of the case for our investees.

Scope 3 category 11: Use of sold products

(7.5.3) Methodological details

This report is drafted on behalf of Hacı Ömer Sabancı Holding A.Ş., the parent company of Sabancı Group. As a Holding company, our business activity can be defined as the management of Group companies (i.e. investees) with a strategic approach. Since there is no manufacturing activities nor a large-scale service/operation at the Holding, calculating processing of use of sold products-related Scope 3 is not relevant nor feasible for us, instead of the case for our investees.

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

(7.5.3) Methodological details

This report is drafted on behalf of Hacı Ömer Sabancı Holding A.Ş., the parent company of Sabancı Group. As a Holding company, our business activity can be defined as the management of Group companies (i.e. investees) with a strategic approach. Since there is no manufacturing activities nor a large-scale

service/operation at the Holding, calculating end of life treatment of sold products-related Scope 3 is not relevant nor feasible for us, instead of the case for our investees.

Scope 3 category 13: Downstream leased assets

(7.5.3) Methodological details

This report is drafted on behalf of Hacı Ömer Sabancı Holding A.Ş., the parent company of Sabancı Group. As a Holding company, our business activity can be defined as the management of Group companies (i.e. investees) with a strategic approach. Since there is no manufacturing activities nor a large-scale service/operation at the Holding, calculating downstream leased assets-related Scope 3 is not relevant nor feasible for us, instead of the case for our investees.

Scope 3 category 14: Franchises

(7.5.3) Methodological details

This report is drafted on behalf of Hacı Ömer Sabancı Holding A.Ş., the parent company of Sabancı Group. As a Holding company, our business activity can be defined as the management of Group companies (i.e. investees) with a strategic approach. Since there is no manufacturing activities nor franchises at the Holding level, this category is not applicable to us.

Scope 3: Other (upstream)

(7.5.3) Methodological details

No additional Scope 3 upstream emission sources are identified. This report is drafted on behalf of Hacı Ömer Sabancı Holding A.Ş., the parent company of Sabancı Group. As a Holding company, our business activity can be defined as the management of Group companies (i.e. investees) with a strategic approach. Since there is no manufacturing activities nor a large-scale service/operation at the Holding, calculating other upstream-related Scope 3 is not relevant nor feasible for us.

Scope 3: Other (downstream)

(7.5.1) Base year end

12/30/2021

(7.5.2) Base year emissions (metric tons CO2e)

11594593

(7.5.3) Methodological details

Portfolio (Cat 15) emissions are calculated as follows: [Scope 1 and 2 emissions of portfolio companies] - [Scope 1 and 2 emissions of portfolio companies x equity share of Sabancı Holding n portfolio companies] [Scope 1 and 2 emissions of portfolio companies x (1-Holding's equity share)] Excerpt from: CDP Technical Note: Portfolio Impact Metrics for Financial Services Sector Companies "The GHG Protocol classifies these emissions in Scope 3 Category 15 Investments. They are also known as portfolio emissions or financed emissions. Put simply, they are emissions that occur at sources owned or controlled by other companies, but which are made possible because those companies are financed by the investment and lending (and insurance underwriting) of financial institutions; therefore, they can be thought of as caused indirectly by the financial institution and should be included in the financial institutions Scope 3 inventory"
[Fixed row]

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

Reporting year

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

8845242.2

(7.6.3) Methodological details

The Scope 1 emissions are calculated for all relevant emissions originating from the direct operations of ours and our portfolio companies, based on our equity share approach.
[Fixed row]

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

Reporting year

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

1223959.18

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

842519.92

(7.7.4) Methodological details

The Scope 2 location-based emissions are calculated by multiplying the amount of purchased electricity, and the national inventory emission factors for electricity production. The purchased electricity data is considered for the Holding and the portfolio companies, based on equity share approach from GHG protocol. On the other hand, market-based emissions are calculated by excluding the amount of renewable energy used by the company based on the amount of market-based instruments (ie., IREC).
[Fixed row]

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

Purchased goods and services

(7.8.1) Evaluation status

Select from:
☑ Not relevant, calculated

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

17

(7.8.3) Emissions calculation methodology

Select all that apply
☑ Average data method

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

100

(7.8.5) Please explain

The total figure of CO2e is negligible for the Holding compared to Category 15 Scope 3 emissions of the Holding, yet it is still calculated. To calculate emissions arising from purchased goods and services, we included single use plastic consumption, paper and water use as mainstream parameters which are relatively feasible to track compared to other indirect emission sources. For that reason, we collect water, paper and plastic data from the Holding and receive verification from a third party. These emissions combined equals the total Scope 3-Category 1 emissions of Sabancı Holding, which is calculated as 17 tCO2e.

Capital goods

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

We used to calculate this category emissions for our investee companies. However, since we changed our consolidation approach and that our investee companies' Scope 3 emissions are not relevant under the newly used equity share approach, we are not including our investee companies' Scope 3 emissions under this Category anymore (instead, we disclose Cat 15 emissions). Since there is no manufacturing activities nor a large-scale service/operation at the Holding, calculating capital assets-related Scope 3 is not relevant nor feasible for us, instead of the case for our investees.

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

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

We used to calculate this category emissions for our investee companies. However, since we changed our consolidation approach and that our investee companies' Scope 3 emissions are not relevant under the newly used equity share approach, we are not including our investee companies' Scope 3 emissions under this Category anymore (instead, we disclose Cat 15 emissions). Since there is no manufacturing activities nor a large-scale service/operation at the Holding, calculating fuel and energy-related Scope 3 is not relevant nor feasible for us, instead of the case for our investees.

Upstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

We used to calculate this category emissions for our investee companies. However, since we changed our consolidation approach and that our investee companies' Scope 3 emissions are not relevant under the newly used equity share approach, we are not including our investee companies' Scope 3 emissions under this Category anymore (instead, we disclose Cat 15 emissions). Since there is no manufacturing activities nor a large-scale service/operation at the Holding, calculating upstream transportation-related Scope 3 is not relevant nor feasible for us, instead of the case for our investees.

Waste generated in operations

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

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

346

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average data method

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

100

(7.8.5) Please explain

According to our equity share approach, we only disclose the Holding's emissions that fall under this category; although, the total figure of CO2e is negligible for the Holding compared to Category 15 Scope 3 emissions of the Holding, yet it is still calculated. In the calculation of emissions arising from waste generation, non-hazardous waste and hazardous waste management are taken into account. GHG emissions originating from our non-hazardous waste and hazardous waste management are calculated as 346 ton CO2e in total.

Business travel

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

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

268.65

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average data method

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

100

(7.8.5) Please explain

According to our equity share approach, we only disclose the Holding's emissions that fall under this category; although, the total figure of CO2e is negligible for the Holding compared to Category 15 Scope 3 emissions of the Holding, yet it is still calculated. Sabancı employees' travel distance is all multiplied by standard flight emission factors, total business travel emissions of Holding was approximately 268.65 tCO2e in 2024.

Employee commuting

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

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

48.22

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average data method

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

100

(7.8.5) Please explain

According to our equity share approach, we only disclose the Holding's emissions that fall under this category; although, the total figure of CO2e is negligible for the Holding compared to Category 15 Scope 3 emissions of the Holding, yet it is still calculated. Sabancı employees' travel distance is all multiplied by standard flight emission factors, total business travel emissions of Holding was approximately 268.65 tCO2e in 2024.

Upstream leased assets

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

We used to calculate this category emissions for our investee companies. However, since we changed our consolidation approach and that our investee companies' Scope 3 emissions are not relevant under the newly used equity share approach, we are not including our investee companies' Scope 3 emissions under this Category anymore (instead, we disclose Cat 15 emissions). Since there is no leased assets by the Holding, calculating upstream leased assets-related Scope 3 is not relevant nor feasible for us, instead of the case for our investees.

Downstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

We used to calculate this category emissions for our investee companies. However, since we changed our consolidation approach and that our investee companies' Scope 3 emissions are not relevant under the newly used equity share approach, we are not including our investee companies' Scope 3 emissions under this Category anymore (instead, we disclose Cat 15 emissions). Since there is no sold products by the Holding, calculating downstream transportation-related Scope 3 is not relevant nor feasible for us, instead of the case for our investees.

Processing of sold products

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

We used to calculate this category emissions for our investee companies. However, since we changed our consolidation approach and that our investee companies' Scope 3 emissions are not relevant under the newly used equity share approach, we are not including our investee companies' Scope 3 emissions under this Category anymore (instead, we disclose Cat 15 emissions). Since there is no no sold products by the Holding, calculating sold products-related Scope 3 is not relevant nor feasible for us, instead of the case for our investees.

Use of sold products

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

We used to calculate this category emissions for our investee companies. However, since we changed our consolidation approach and that our investee companies' Scope 3 emissions are not relevant under the newly used equity share approach, we are not including our investee companies' Scope 3 emissions under this Category anymore (instead, we disclose Cat 15 emissions). Since there is no sold products by the Holding, calculating sold products-related Scope 3 is not relevant nor feasible for us, instead of the case for our investees.

End of life treatment of sold products

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

We used to calculate this category emissions for our investee companies. However, since we changed our consolidation approach and that our investee companies' Scope 3 emissions are not relevant under the newly used equity share approach, we are not including our investee companies' Scope 3 emissions under this Category anymore (instead, we disclose Cat 15 emissions). Since there is no sold products by the Holding, calculating sold products-related Scope 3 is not relevant nor feasible for us, instead of the case for our investees.

Downstream leased assets

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

We used to calculate this category emissions for our investee companies. However, since we changed our consolidation approach and that our investee companies' Scope 3 emissions are not relevant under the newly used equity share approach, we are not including our investee companies' Scope 3 emissions under this Category anymore (instead, we disclose Cat 15 emissions). Since there is no leased assets by the Holding, calculating downstream leased assets-related Scope 3 is not relevant nor feasible for us, instead of the case for our investees.

Franchises

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

We used to calculate this category emissions for our investee companies. However, since we changed our consolidation approach and that our investee companies' Scope 3 emissions are not relevant under the newly used equity share approach, we are not including our investee companies' Scope 3 emissions under this Category anymore (instead, we disclose Cat 15 emissions). Since there is no sold products by the Holding, calculating franchise-related Scope 3 is not relevant nor feasible for us, instead of the case for our investees.

Other (upstream)

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

No additional Scope 3 upstream emission sources are identified. This report is drafted on behalf of Hacı Ömer Sabancı Holding A.Ş., the parent company of Sabancı Group. As a Holding company, our business activity can be defined as the management of Group companies (i.e. investees) with a strategic approach. Since there is no manufacturing activities nor a large-scale service/operation at the Holding, calculating other upstream-related Scope 3 is not relevant nor feasible for us.

Other (downstream)

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

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

10073040.93

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average data method

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

100

(7.8.5) Please explain

Portfolio (Cat 15) emissions are calculated as follows: [Scope 1 and 2 emissions of portfolio companies] - [Scope 1 and 2 emissions of portfolio companies x equity share of Sabancı Holding n portfolio companies] [Scope 1 and 2 emissions of portfolio companies x (1-Holding's equity share)] Excerpt from: CDP Technical Note: Portfolio Impact Metrics for Financial Services Sector Companies "The GHG Protocol classifies these emissions in Scope 3 Category 15 Investments.
[Fixed row]

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

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

[Fixed row]

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

Row 1

(7.9.1.1) Verification or assurance cycle in place

Select from:

☑ Annual process

(7.9.1.2) Status in the current reporting year

Select from:

☑ Complete

(7.9.1.3) Type of verification or assurance

Select from:

☑ Limited assurance

(7.9.1.4) Attach the statement

Sabancı Holding_Assurance.pdf,Sabancı Holding_Assurance.pdf

(7.9.1.5) Page/section reference

Scope & Selected information: page 1 in independent assurance report, page 181(Annex 5) in sustainability report GHG Emissions: page 2 in independent assurance report, page 182 (Annex 5) in sustainability report Opinion & Assurance Standard: page 3-4 in independent assurance report, page 183-184 (Annex 5) in sustainability report 2024 Sustainability Report link: https://sustainability.sabanci.com/2024/images/pdf/Sabanci-Holding-Sustainability-For-a-Better-Life-2024-Report.pdf

(7.9.1.6) Relevant standard

Select from:

☑ ISAE3000

(7.9.1.7) Proportion of reported emissions verified (%)

100
[Add row]

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

Row 1

(7.9.2.1) Scope 2 approach

Select from:

☑ Scope 2 location-based

(7.9.2.2) Verification or assurance cycle in place

Select from:

☑ Annual process

(7.9.2.3) Status in the current reporting year

Select from:

☑ Complete

(7.9.2.4) Type of verification or assurance

Select from:

☑ Limited assurance

(7.9.2.5) Attach the statement

Sabancı Holding_Assurance.pdf

(7.9.2.6) Page/ section reference

Scope & Selected information: page 1 in independent assurance report, page 181(Annex 5) in sustainability report GHG Emissions: page 2 in independent assurance report, page 182 (Annex 5) in sustainability report Opinion & Assurance Standard: page 3-4 in independent assurance report, page 183-184 (Annex 5) in sustainability report 2024 Sustainability Report link: https://sustainability.sabanci.com/2024/images/pdf/Sabanci-Holding-Sustainability-For-a-Better-Life-2024-Report.pdf

(7.9.2.7) Relevant standard

Select from:

☑ ISAE3000

(7.9.2.8) Proportion of reported emissions verified (%)

100

Row 2

(7.9.2.1) Scope 2 approach

Select from:

☑ Scope 2 market-based

(7.9.2.2) Verification or assurance cycle in place

Select from:

☑ Annual process

(7.9.2.3) Status in the current reporting year

Select from:

☑ Complete

(7.9.2.4) Type of verification or assurance

Select from:

☑ Limited assurance

(7.9.2.5) Attach the statement

Sabancı Holding_Assurance.pdf

(7.9.2.6) Page/ section reference

Scope & Selected information: page 1 in independent assurance report, page 181(Annex 5) in sustainability report GHG Emissions: page 2 in independent assurance report, page 182 (Annex 5) in sustainability report Opinion & Assurance Standard: page 3-4 in independent assurance report, page 183-184 (Annex 5) in sustainability report 2024 Sustainability Report link: https://sustainability.sabanci.com/2024/images/pdf/Sabanci-Holding-Sustainability-For-a-Better-Life-2024-Report.pdf

(7.9.2.7) Relevant standard

Select from:

☑ ISAE3000

(7.9.2.8) Proportion of reported emissions verified (%)

100
[Add row]

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

Row 1

(7.9.3.1) Scope 3 category

Select all that apply

☑ Scope 3: Purchased goods and services

☑ Scope 3: Waste generated in operations

☑ Scope 3: Business travel

☑ Scope 3: Employee commuting

☑ Scope 3: Investments

(7.9.3.2) Verification or assurance cycle in place

Select from:

☑ Annual process

(7.9.3.3) Status in the current reporting year

Select from:
☑ Complete

(7.9.3.4) Type of verification or assurance

Select from:
☑ Limited assurance

(7.9.3.5) Attach the statement

Sabancı Holding_Assurance.pdf

(7.9.3.6) Page/section reference

Scope & Selected information: page 1 GHG Emissions: page 2 Opinion & Assurance Standart: page 3-4

(7.9.3.7) Relevant standard

Select from:
☑ ISAE3000

(7.9.3.8) Proportion of reported emissions verified (%)

100
[Add row]

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

Select from:

☑ Increased

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

Change in renewable energy consumption

(7.10.1.1) Change in emissions (metric tons CO2e)

134246.94

(7.10.1.2) Direction of change in emissions

Select from:
☑ Decreased

(7.10.1.3) Emissions value (percentage)

1.5

(7.10.1.4) Please explain calculation

*The Holding's investee companies have increased the use of renewable electricity in 2024. This caused 134,246.94 tCO2e emissions reduction. The percentage is calculated as follows: Scope 1&2 in 2023: 8,941,589.10 tCO2e Change in emissions due to renewable energy consumption in 2024: -134,246.94 tCO2e Emissions value (percentage) calculation: (-134,246.94 /8,941,589.10)*100= -1.50%*

Other emissions reduction activities

(7.10.1.1) Change in emissions (metric tons CO2e)

77334

(7.10.1.2) Direction of change in emissions

Select from:

☑ Decreased

(7.10.1.3) Emissions value (percentage)

0.86

(7.10.1.4) Please explain calculation

*Sabancı Holding companies are implementing effective emission reduction initiatives, altering production technologies, investing in climate related R&D, improving production lines with low carbon alternatives. In the reporting year, emission reduction was mainly driven by energy efficiency, increased use of renewable electricity across all our businesses, increased use of alternative raw materials and fuel in material technologies, and the decrease of natural gas use in the energy business. In 2024, investee companies have implemented several emission reduction initiatives. The total emission reduction is calculated to be 77,334 tCO2e. The percentage is calculated as follows: Scope 1&2 in 2023: 8,941,589.10 tCO2e Change in emissions due to emission reduction activities in 2024: -77,334 tCO2e Emissions value (percentage) calculation: (-77,334 /8,941,589.10)*100= -0.86%*

Acquisitions

(7.10.1.1) Change in emissions (metric tons CO2e)

400811.15

(7.10.1.2) Direction of change in emissions

Select from:

☑ Increased

(7.10.1.3) Emissions value (percentage)

4.48

(7.10.1.4) Please explain calculation

*Overall scope 1 and 2 GHG emissions increased during the reporting year compared to 2023, due to the acquisitions of Mannok. The percentage is calculated as follows: Scope 1&2 in 2023: 8,941,589.10 tCO2e Change in emissions due to the acquisition in 2024: 400,811.15 Emission value (percentage) calculation: (400,811.15/8,941,589.10 tCO2e)*100=4.48%*

Change in output

(7.10.1.1) Change in emissions (metric tons CO2e)

212230.37

(7.10.1.2) Direction of change in emissions

Select from:

☑ Increased

(7.10.1.3) Emissions value (percentage)

2.37

(7.10.1.4) Please explain calculation

*Overall scope 1 and 2 GHG emissions increased during the reporting year compared to 2023, due to the change in output. A solid example will be the full capacity operation of natural gas plants that had been under maintenance in the previous year. The full-capacity operation was driven by higher energy demand to ensure supply security. The percentage is calculated as follows: Scope 1&2 in 2023: 8,941,589.10 tCO2e Change in emissions due to change in outputs in 2024: 212,230.37 tCO2e Emissions value (percentage) calculation: (212,230.37/8,941,589.10)*100= 2.37%*

Change in boundary

(7.10.1.1) Change in emissions (metric tons CO2e)

344712.86

(7.10.1.2) Direction of change in emissions

Select from:

☑ Increased

(7.10.1.3) Emissions value (percentage)

3.86

(7.10.1.4) Please explain calculation

*Overall scope 1 and 2 GHG emissions increased during the reporting year compared to 2023, due to the expanded reporting boundaries covering all operations, including global activities. The percentage is calculated as follows: Scope 1&2 in 2023: 8,941,589.10 tCO2e Change in emissions due to change in boundary in 2024: 344,712.86 tCO2e Emissions value (percentage) calculation: (344,712.86/8,941,589.10)*100= 3.86%*
[Fixed row]

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

Select from:
☑ Market-based

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

Select from:
☑ No

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

Select from:
☑ More than 0% but less than or equal to 5%

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

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	*Select from:*

	Indicate whether your organization undertook this energy-related activity in the reporting year
	☑ Yes
Consumption of purchased or acquired electricity	*Select from:* ☑ Yes
Consumption of purchased or acquired heat	*Select from:* ☑ No
Consumption of purchased or acquired steam	*Select from:* ☑ No
Consumption of purchased or acquired cooling	*Select from:* ☑ No
Generation of electricity, heat, steam, or cooling	*Select from:* ☑ Yes

[Fixed row]

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

Consumption of fuel (excluding feedstock)

(7.30.1.1) Heating value

Select from:

☑ LHV (lower heating value)

(7.30.1.2) MWh from renewable sources

0

(7.30.1.3) MWh from non-renewable sources

33493242.19

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

33493242.19

Consumption of purchased or acquired electricity

(7.30.1.1) Heating value

Select from:
☑ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

1778787.67

(7.30.1.3) MWh from non-renewable sources

1246846.21

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

3025633.88

Consumption of self-generated non-fuel renewable energy

(7.30.1.1) Heating value

Select from:
☑ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

162349

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

162349.00

Total energy consumption

(7.30.1.1) Heating value

Select from:
☑ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

1941136.67

(7.30.1.3) MWh from non-renewable sources

34740088.4

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

36681225.07
[Fixed row]

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

Turkey

(7.30.16.1) Consumption of purchased electricity (MWh)

2863284.87

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

66799

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

0

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

95550

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

3025633.87
[Fixed row]

(7.45) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

Row 1

(7.45.1) Intensity figure

0.00001665

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

9687762.13

(7.45.3) Metric denominator

Select from:
☑ unit total revenue

(7.45.4) Metric denominator: Unit total

581837541356.35

(7.45.5) Scope 2 figure used

Select from:

☑ Market-based

(7.45.6) % change from previous year

14

(7.45.7) Direction of change

Select from:

☑ Decreased

(7.45.8) Reasons for change

Select all that apply

☑ Acquisitions

☑ Change in output

☑ Change in revenue

☑ Change in boundary

☑ Other emissions reduction activities

☑ Change in renewable energy consumption

(7.45.9) Please explain

In 2023, our Scope 1 & 2 emissions/non-bank TRY revenue intensity was 0.00001942 tCO2e/TRY. In 2024, our Scope 1&2 emissions increased to 9,687,762.13 tCO2e, whereas our combined non-bank net sales revenues was TRY 582 billion, leading to a Scope 1&2 emissions/ non-bank TRY revenue intensity of 0.000016650 tCO2e/TRY. This represents a 14% decrease in the metric, driven by a 27% increase in non-bank net sales revenues combined with an 8% increase in Scope 1&2 emissions. The 8% increase in Scope 1&2 GHG emissions compared to 2023 was mainly due to expanded reporting boundaries covering all operations, including global activities, as well as the full-capacity operation of natural gas plants that had been under maintenance in the previous year, driven by higher energy demand to ensure supply security.
[Add row]

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

Row 1

(7.52.1) Description

Select from:

☑ Energy usage

(7.52.2) Metric value

0.06

(7.52.3) Metric numerator

Energy Use in MWh

(7.52.4) Metric denominator (intensity metric only)

Revenue in thousand Turkish Liras

(7.52.5) % change from previous year

12

(7.52.6) Direction of change

Select from:

☑ Decreased

(7.52.7) Please explain

The total energy use has increased from 33,014,061 MWh to 36,681,225 MWh. Non-bank revenue has increased from TRY 457.13 bn to TRY 581.84 bn. The intensity value therefore has decreased from 0.07 MWh/Revenue TRY to 0.06 MWh/Revenue TRY. This represents a decrease of approximately 12% in the intensity value.

[Add row]

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

Select all that apply

☑ Absolute target

☑ Portfolio target

(7.53.1) Provide details of your absolute emissions targets and progress made against those targets.

Row 1

(7.53.1.1) Target reference number

Select from:

☑ Abs 1

(7.53.1.2) Is this a science-based target?

Select from:

☑ Yes, we consider this a science-based target, but we have not committed to seek validation of this target by the Science Based Targets initiative within the next two years

(7.53.1.4) Target ambition

Select from:

☑ 1.5°C aligned

(7.53.1.5) Date target was set

12/30/2021

(7.53.1.6) Target coverage

Select from:

☑ Organization-wide

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

☑ Methane (CH4)

☑ Nitrous oxide (N2O)

☑ Carbon dioxide (CO2)

☑ Perfluorocarbons (PFCs)

☑ Hydrofluorocarbons (HFCs)

☑ Sulphur hexafluoride (SF6)

☑ Nitrogen trifluoride (NF3)

(7.53.1.8) Scopes

Select all that apply

☑ Scope 1

☑ Scope 2

(7.53.1.9) Scope 2 accounting method

Select from:

☑ Market-based

(7.53.1.11) End date of base year

12/30/2021

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

9977578

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

1227675

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

0.000

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

11205253.000

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

100

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

100

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

100

(7.53.1.54) End date of target

12/30/2030

(7.53.1.55) Targeted reduction from base year (%)

42

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

6499046.740

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

8845242.2

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

842519.92

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

9687762.120

(7.53.1.78) Land-related emissions covered by target

Select from:

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

(7.53.1.79) % of target achieved relative to base year

32.24

(7.53.1.80) Target status in reporting year

Select from:

☑ Underway

(7.53.1.82) Explain target coverage and identify any exclusions

This target covers Scope 1 and Scope 2 market-based emissions of Sabancı Holding, and no emission sources were excluded. The target does not include FLAG emissions. The base year has been chosen as 2021, as this year better represents the business activities compared to 2020 (due to the pandemic) and 2022 (due to the energy crisis, etc.). The targeted reduction rate is aligned with SBTi's 1.5 degrees scenario. The annual linear reduction corresponds to a minimum of 4.2%. In 2024, Sabancı Holding's total Scope 1 and 2 emissions increased by 8% in the reporting year, however emission reduction initiatives led to more than 32% of the target being achieved.

(7.53.1.83) Target objective

Climate is one of the planet's most critical boundaries, and addressing it is fundamental to our sustainable future. At Sabancı Holding, we aspire to lead in this domain, recognizing the urgency and significance of climate action. We have expanded the scope of our climate efforts through our "Nature Agenda," which includes comprehensive initiatives on decarbonization, water management, biodiversity, and circular economy. In 2021, we set our Absolute Emission Reduction target to align with our commitment to combat climate change. This decision reflects our belief that effective climate leadership is essential for driving sustainable progress. Our

approach includes a comprehensive analysis of both the impacts of climate change on our operations (inside-out) and how our activities affect the environment (outside-in), ensuring a robust and holistic strategy. We actively monitor our target and its progress. This ongoing commitment allows us to address potential risks and opportunities effectively, reinforcing our position as a leader in climate action and ensuring that we contribute meaningfully to global efforts to limit warming to 1.5C.

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

Sabancı Holding will implement several initiatives to achieve its emission reduction targets in line with its climate transition plan. The increased use of renewable electricity, transformation of vehicle fleet with electric alternatives, grid decarbonization / theft & loss reduction and SF6 Recovery in electric utilities business, shifting from carbon intensive fossil fuels to low carbon alternatives, raw material substitution, clinker substitution, furnace/boiler electrification, blending renewable natural gas (RNG), using heat pumps and bio diesel blend, optimization of product and network will support the achievement of targets.

(7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

☑ No

Row 2

(7.53.1.1) Target reference number

Select from:

☑ Abs 2

(7.53.1.2) Is this a science-based target?

Select from:

☑ Yes, we consider this a science-based target, but we have not committed to seek validation of this target by the Science Based Targets initiative within the next two years

(7.53.1.4) Target ambition

Select from:

☑ 1.5°C aligned

(7.53.1.5) Date target was set

12/30/2021

(7.53.1.6) Target coverage

Select from:

☑ Organization-wide

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

☑ Methane (CH4)

☑ Nitrous oxide (N2O)

☑ Carbon dioxide (CO2)

☑ Perfluorocarbons (PFCs)

☑ Hydrofluorocarbons (HFCs)

☑ Sulphur hexafluoride (SF6)

☑ Nitrogen trifluoride (NF3)

(7.53.1.8) Scopes

Select all that apply

☑ Scope 1

☑ Scope 2

(7.53.1.9) Scope 2 accounting method

Select from:

☑ Market-based

(7.53.1.11) End date of base year

12/30/2021

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

9977578

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

1227675

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

0.000

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

11205253.000

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

100

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

100

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

100

(7.53.1.54) End date of target

12/30/2050

(7.53.1.55) Targeted reduction from base year (%)

90

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

1120525.300

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

8845242.2

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

842519.92

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

9687762.120

(7.53.1.78) Land-related emissions covered by target

Select from:

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

(7.53.1.79) % of target achieved relative to base year

15.05

(7.53.1.80) Target status in reporting year

Select from:

☑ Underway

(7.53.1.82) Explain target coverage and identify any exclusions

This target covers Scope 1 and Scope 2 market-based emissions of Sabancı Holding, and no emission sources were excluded. The target does not include FLAG emissions. The base year has been chosen as 2021, as this year better represents the business activities compared to 2020 (due to the pandemic) and 2022 (due to the energy crisis, etc.). The targeted reduction rate is aligned with SBTi's 1.5 degrees scenario. The annual linear reduction corresponds to a minimum of 4.2%. In 2024, Sabancı Holding's total Scope 1 and 2 emissions increased by 8% in the reporting year, however emission reduction initiatives led to more than 15% of the target being achieved.

(7.53.1.83) Target objective

Climate is one of the planet's most critical boundaries, and addressing it is fundamental to our sustainable future. At Sabancı Holding, we aspire to lead in this domain, recognizing the urgency and significance of climate action. We have expanded the scope of our climate efforts through our "Nature Agenda," which includes comprehensive initiatives on decarbonization, water management, biodiversity, and circular economy. In 2021, we set our long-term emission reduction target to align with our commitment to combat climate change. This decision reflects our belief that effective climate leadership is essential for driving sustainable progress. Our approach includes a comprehensive analysis of both the impacts of climate change on our operations (inside-out) and how our activities affect the environment (outside-in), ensuring a robust and holistic strategy. We actively monitor our target and its progress. This ongoing commitment allows us to address potential risks and opportunities effectively, reinforcing our position as a leader in climate action and ensuring that we contribute meaningfully to global efforts to limit warming to 1.5C.

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

Sabancı Holding will implement several initiatives to achieve its emission reduction targets in line with its climate transition plan. The increased use of renewable electricity, transformation of vehicle fleet with electric alternatives, grid decarbonization / theft & loss reduction and SF6 Recovery in electric utilities business, shifting from carbon intensive fossil fuels to low carbon alternatives, raw material substitution, clinker substitution, furnace/boiler electrification, blending renewable natural gas (RNG), using heat pumps and bio diesel blend, optimization of product and network will support the achievement of targets.

(7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

☑ No

[Add row]

(7.53.4) Provide details of the climate-related targets for your portfolio.

Row 1

(7.53.4.1) Target reference number

Select from:

☑ Por1

(7.53.4.2) Target type

Select from:

☑ Absolute portfolio emissions

(7.53.4.4) Methodology used when setting the target

Select from:

☑ Other please specify :SBTi for corporate institutions

(7.53.4.5) Date target was set

05/07/2023

(7.53.4.6) Target is set and progress against it is tracked at

Select from:

☑ Portfolio level

(7.53.4.9) Portfolio

Select from:

☑ Investing (Asset owner)

(7.53.4.10) Asset classes covered by the target

Select all that apply

☑ Equity investments

(7.53.4.11) Sectors covered by the target

Select all that apply

☑ Retail

☑ Services

☑ Materials

☑ Manufacturing

☑ Infrastructure

☑ Power generation

☑ Transportation services

(7.53.4.12) Target type: Absolute or intensity

Select from:

☑ Absolute

(7.53.4.14) % of portfolio emissions covered by the target

100

(7.53.4.16) Metric (or target numerator if intensity)

Select from:

☑ tCO2e

(7.53.4.18) % of portfolio covered in relation to total portfolio value

100

(7.53.4.21) Frequency of target reviews

Select from:

☑ Annually

(7.53.4.22) End date of base year

12/30/2021

(7.53.4.23) Figure in base year

11594593

(7.53.4.24) We have an interim target

Select from:

☑ Yes

(7.53.4.25) End of interim target year

12/30/2025

(7.53.4.26) Figure in interim target year

9855404

(7.53.4.27) End date of target

12/30/2030

(7.53.4.28) Figure in target year

6724864

(7.53.4.29) Figure in reporting year

10073040

(7.53.4.30) % of target achieved relative to base year

31.24512678220903

(7.53.4.31) Target status in reporting year

Select from:

☑ Underway

(7.53.4.34) Is this a science-based target?

Select from:

☑ No, but we are reporting another target that is science-based

(7.53.4.37) Please explain target coverage and identify any exclusions

Portfolio emissions are calculated as: [Scope 1&2 emissions of portfolio companies] - [Scope 1&2 emissions x equity share of Sabancı Holding] = [Scope 1&2 emissions x (1-Holding's equity share)]. Sabancı Holding envisages to reduce its Scope 3 emissions by ~42% by 2030 (vs. 2021) using the equity share approach.

Scope 3 calculation method: [Subsidiary A Scope 1&2 x (1-Holding equity share)] + [Subsidiary B Scope 1&2 x (1-Holding equity share)] +... Except from CDP Technical Note: "The GHG Protocol classifies these emissions under Scope 3 Category 15 Investments, also known as portfolio/financed emissions." It is important to note that Sabancı Holding is an investment holding, not a bank, and the standards mentioned in this drop-down menu is only applicable to our banking subsidiary, i.e. Akbank. In 2022, Akbank committed to becoming a Net Zero Bank by 2050, as part of the Net-Zero Banking Alliance (NZBA). Akbank has set climate-related and science-based targets for 2030 across key sectors of its loan portfolio to achieve its 2050 goal. Akbank's targets, aligned with NZBA and SBTi guidelines, focus on decarbonizing power, cement, iron & steel, and commercial real estate sectors. The interim targets, based on financed emissions, follow the Partnership for Carbon Accounting Financials (PCAF) methodology and the IEA's 'net zero by 2050' pathway, limiting global warming to 1.5°C.

(7.53.4.38) Target objective

Climate is one of the planet's most critical boundaries, and addressing it is fundamental to our sustainable future. At Sabancı Holding, we aspire to lead in this domain, recognizing the urgency and significance of climate action. We have expanded the scope of our climate efforts through our "Nature Agenda," which includes comprehensive initiatives on decarbonization, water management, biodiversity, and circular economy. In 2021, we set our Net Zero target to align with our commitment to combat climate change. This decision reflects our belief that effective climate leadership is essential for driving sustainable progress. Our approach includes a comprehensive analysis of both the impacts of climate change on our operations (inside-out) and how our activities affect the environment (outside-in), ensuring a robust and holistic strategy. We actively monitor and advance our Net Zero objectives by integrating these insights into our strategic framework. This ongoing commitment allows us to address potential risks and opportunities effectively, reinforcing our position as a leader in climate action and ensuring that we contribute meaningfully to global efforts to limit warming to 1.5°C.
[Add row]

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

Select all that apply

☑ Targets to increase or maintain low-carbon energy consumption or production

☑ Net-zero targets

☑ Other climate-related targets

(7.54.1) Provide details of your targets to increase or maintain low-carbon energy consumption or production.

Row 1

(7.54.1.1) Target reference number

Select from:

☑ Low 1

(7.54.1.2) Date target was set

12/30/2022

(7.54.1.3) Target coverage

Select from:

☑ Organization-wide

(7.54.1.4) Target type: energy carrier

Select from:

☑ Electricity

(7.54.1.5) Target type: activity

Select from:

☑ Consumption

(7.54.1.6) Target type: energy source

Select from:

☑ Renewable energy source(s) only

(7.54.1.7) End date of base year

12/30/2022

(7.54.1.8) Consumption or production of selected energy carrier in base year (MWh)

615094

(7.54.1.9) % share of low-carbon or renewable energy in base year

27

(7.54.1.10) End date of target

12/30/2030

(7.54.1.11) % share of low-carbon or renewable energy at end date of target

80

(7.54.1.12) % share of low-carbon or renewable energy in reporting year

59

(7.54.1.13) % of target achieved relative to base year

60.38

(7.54.1.14) Target status in reporting year

Select from:

☑ Underway

(7.54.1.16) Is this target part of an emissions target?

Abs1

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

Select all that apply

☑ No, it's not part of an overarching initiative

(7.54.1.19) Explain target coverage and identify any exclusions

Sabancı Group aims to use 80% renewable electricity across 100% of its portfolio by the end of 2030. In the reporting year, we have already achieved 59% renewable electricity ratio. If there are any changes in the portfolio, target will be recalculated.

(7.54.1.20) Target objective

Our objective is to transition to 80% of our electricity consumption to renewable energy sources across all operational facilities. This goal aligns with our broader commitment to sustainability and climate leadership, aiming to significantly reduce our GHG emissions for our portfolio to contribute global efforts to combat climate change. Progress towards this target is regularly monitored and reported to ensure transparency and accountability.

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

Sabancı Group has increased the use of renewable electricity use. The increase in the amount of I-REC certificate and on-site renewable electricity generation are among the major actions we will undertake in order to achieve this target.
[Add row]

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

Row 1

(7.54.2.1) Target reference number

Select from:
☑ Oth 1

(7.54.2.2) Date target was set

12/30/2022

(7.54.2.3) Target coverage

Select from:
☑ Organization-wide

(7.54.2.4) Target type: absolute or intensity

Select from:
☑ Absolute

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

Energy consumption or efficiency

☑ Other energy consumption or efficiency, please specify :Renewable electricity consumption

(7.54.2.7) End date of base year

12/30/2022

(7.54.2.8) Figure or percentage in base year

27

(7.54.2.9) End date of target

12/30/2030

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

80

(7.54.2.11) Figure or percentage in reporting year

59

(7.54.2.12) % of target achieved relative to base year

60.3773584906

(7.54.2.13) Target status in reporting year

Select from:

☑ Underway

(7.54.2.15) Is this target part of an emissions target?

Abs1

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

Select all that apply

☑ No, it's not part of an overarching initiative

(7.54.2.18) Please explain target coverage and identify any exclusions

Sabancı Group aims to use 80% renewable electricity across 100% of its portfolio by the end of 2030. In the reporting year, we have already achieved 59% renewable electricity ratio. If there are any changes in the portfolio, target will be recalculated.

(7.54.2.19) Target objective

Our objective is to transition to 80% of our electricity consumption to renewable energy sources across all operational facilities. This goal aligns with our broader commitment to sustainability and climate leadership, aiming to significantly reduce our GHG emissions for our portfolio to contribute global efforts to combat climate change. Progress towards this target is regularly monitored and reported to ensure transparency and accountability.

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

Sabancı Group has increased the use of renewable electricity use. The increase in the amount of I-REC certificate and on-site renewable electricity generation are among the major actions we will undertake in order to achieve this target.
[Add row]

(7.54.3) Provide details of your net-zero target(s).

Row 1

(7.54.3.1) Target reference number

Select from:

☑ NZ1

(7.54.3.2) Date target was set

02/14/2021

(7.54.3.3) Target Coverage

Select from:

☑ Organization-wide

(7.54.3.4) Targets linked to this net zero target

Select all that apply

☑ Abs1

☑ Abs2

(7.54.3.5) End date of target for achieving net zero

12/30/2050

(7.54.3.6) Is this a science-based target?

Select from:

☑ Yes, we consider this a science-based target, but we have not committed to seek validation of this target by the Science Based Targets initiative within the next two years

(7.54.3.8) Scopes

Select all that apply

☑ Scope 1

☑ Scope 2

☑ Scope 3

(7.54.3.9) Greenhouse gases covered by target

Select all that apply

☑ Methane (CH4)

☑ Nitrous oxide (N2O)

☑ Carbon dioxide (CO2)

☑ Sulphur hexafluoride (SF6)

☑ Nitrogen trifluoride (NF3)

☑ Perfluorocarbons (PFCs)

☑ Hydrofluorocarbons (HFCs)

(7.54.3.10) Explain target coverage and identify any exclusions

As Sabancı Group, we have set Net Zero Emissions target in all operations until 2050. This target covers all operations of Sabancı Holding's investee companies.

(7.54.3.11) Target objective

As an investment holding company, Sabancı Holding is committed to achieving net-zero emissions by 2050. Our goal is to ensure our portfolio transition towards sustainable, low-carbon operations. To achieve this, we not only integrate ESG criteria into our investment decisions, but also actively review our current operations. In addition, we engage with our investee companies to implement decarbonization strategies, and support innovation in green technologies. By setting a net-zero target, we aim to lead by example in the financial industry, demonstrating that responsible investment and sustainable growth are not only possible but essential for long-term success.

(7.54.3.12) Do you intend to neutralize any residual emissions with permanent carbon removals at the end of the target?

Select from:

☑ Yes

(7.54.3.13) Do you plan to mitigate emissions beyond your value chain?

Select from:

☑ Yes, and we have already acted on this in the reporting year

(7.54.3.14) Do you intend to purchase and cancel carbon credits for neutralization and/or beyond value chain mitigation?

Select all that apply

☑ Yes, we plan to purchase and cancel carbon credits for neutralization at the end of the target

(7.54.3.15) Planned milestones and/or near-term investments for neutralization at the end of the target

Sabancı Holding and its investee companies are seeking for carbon removal technologies through a variety of business development and innovation programs. The Holding is also looking into merging its biodiversity ambitions with nature-based carbon removal solutions. In 2023, a project was started to explore the potential synergies between those two initiatives.

(7.54.3.16) Describe the actions to mitigate emissions beyond your value chain

Sabancı Holding is investing/exploring investment opportunities in technologies such as fusion energy, green hydrogen and carbon removal technologies. Such businesses enable their clients to decarbonize their operations. The areas of investments are published in our Annual Report and Sustainability Report.

(7.54.3.17) Target status in reporting year

Select from:

☑ Underway

(7.54.3.19) Process for reviewing target

Sabancı Group implements a comprehensive approach to achieve its sustainability goals, as being the first holding company in Türkiye to announce Net Zero Emissions target by 2050. Our efforts expanded to a comprehensive nature program, called the Nature Agenda, which includes decarbonization initiatives, water management, biodiversity, and circular economy. This program employs both an outside-in and inside-out approach.
[Add row]

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

Select from:

☑ Yes

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

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e
Under investigation	*0*	*`Numeric input*

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e
To be implemented	*0*	*0*
Implementation commenced	*0*	*0*
Implemented	*1*	*77334*
Not to be implemented	*0*	*`Numeric input*

[Fixed row]

(7.55.2) Provide details on the initiatives implemented in the reporting year in the table below.

Row 1

(7.55.2.1) Initiative category & Initiative type

Low-carbon energy consumption

☑ Other, please specify :A wide range of emission reduction initiatives ranging from energy efficiency to circular economy practices

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

77334

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

Select all that apply

☑ Scope 1

☑ Scope 2 (location-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

☑ Voluntary

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

2267088064

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

595812652

(7.55.2.7) Payback period

Select from:

☑ 1-3 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☑ 16-20 years

(7.55.2.9) Comment

Sabancı Holding and its investee companies are realizing a wide range of environmental investments mainly in the field of energy savings. The Holding collects data on such projects on a consolidated basis given the diverse structure of our portfolio and it is not feasible not practical to collect separately.ite your answer here
[Add row]

(7.55.3) What methods do you use to drive investment in emissions reduction activities?

Row 1

(7.55.3.1) Method

Select from:

☑ Dedicated budget for low-carbon product R&D

(7.55.3.2) Comment

As Sabancı Group, we develop new products and services that reduce resource use and GHG emissions, enable transition to more sustainable technologies, facilitate the spread of these technologies, and create a positive social impact. In the reporting year, 71% of Sabancı Group's total R&D and innovation investments were allocated to areas serving the SDGs. Thus, we have exceeded our 2025 target of 70% for sustainability-linked R&D and innovation investments across Sabancı Group operations.

Row 2

(7.55.3.1) Method

Select from:

☑ Dedicated budget for other emissions reduction activities

(7.55.3.2) Comment

We monitor environmental investments in the following 3 categories: Mitigation Investments: Investments that reduce direct resource use or carbon emissions. The investment amount for this area was TRY 1.32 billion across all companies at Sabancı Holding's investee companies in the reporting year. Transition Investments: It refers to investments in products and services that can be considered as a transition to more sustainable technologies, such as cement and rubber products produced using alternative raw materials and/or fuels. The investment amount for this area was approximately TL 162 million across all companies at Sabancı Holding's investee companies in the reporting year. Enabler Investments: Refers to products that are not considered as direct resource/carbon emission reduction activities, but that facilitate the dissemination of related technologies. The investment amount for this area was approximately TL 2.74 billion across all companies at Sabancı Holding's investee companies in the reporting year.

Row 3

(7.55.3.1) Method

Select from:

☑ Employee engagement

(7.55.3.2) Comment

In 2024, a total of 29,036 sustainability training hours were provided. As an example to such trainings, Sabancı Holding implemented group-wide training sessions, where the sustainability impacts of the businesses were explained to employees and detailed information provided regarding emerging sustainability regulations such as EU taxonomy and ESRS.

Row 4

(7.55.3.1) Method

Select from:

☑ Internal price on carbon

(7.55.3.2) Comment

Sabancı Holding takes into account the price on carbon for risk management purposes in its new and existing investments. This method drives capital allocation decisions at the Holding level as well as the mitigation measures across investee companies.

Row 5

(7.55.3.1) Method

Select from:

☑ Internal incentives/recognition programs

(7.55.3.2) Comment

Sabancı Holding organizes the Sabancı Golden Collar Awards annually as a key component of its Recognition and Appreciation systems, broadcast live to all Group companies. The awards comprise five categories, including Sustainability, where sustainable business models and projects are promoted and recognized. In 2024, for example, projects submitted under the Sustainability Category were showcased, and best practices were voted on by employees of both the Holding and investee companies. All Group companies are invited to participate with their projects each year, fostering a culture of continuous improvement and sustainability-driven innovation across the Group.

Row 6

(7.55.3.1) Method

Select from:

☑ Partnering with governments on technology development

(7.55.3.2) Comment

We collaborate with and are in constant communication with the Ministry of Energy and Natural Resources as well as EMRA (Energy Market Regulatory Authority) on developing new technologies. The main funding source of our R&D projects is the EMRA's R&D Fund, while other sources include the European Union Framework Programs, ITEA, Horizon Europe, and EUROGIA.
[Add row]

(7.79) Has your organization retired any project-based carbon credits within the reporting year?

Select from:
☑ No

C12. Environmental performance - Financial Services

(12.1) Does your organization measure the impact of your portfolio on the environment?

Investing (Asset owner)

(12.1.1) We measure the impact of our portfolio on the climate

Select from:

☑ Yes

(12.1.2) Disclosure metric

Select all that apply

☑ Financed emissions

☑ Other carbon footprinting and/or exposure metrics (as defined by TCFD)

(12.1.8) We measure the impact of our portfolio on water

Select from:

☑ Yes

(12.1.11) We measure the impact of our portfolio on biodiversity

Select from:

☑ Yes

[Fixed row]

(12.1.1) Provide details of your organization's financed emissions in the reporting year and in the base year.

Investing (Asset owner)

(12.1.1.1) Asset classes covered in the calculation

Select all that apply

☑ Equity investments

(12.1.1.2) Financed emissions (metric unit tons CO2e) in the reporting year

10073041

(12.1.1.3) % of portfolio covered in relation to total portfolio value

100

(12.1.1.4) Total value of assets included in the financed emissions calculation

3073578933000.00

(12.1.1.5) % of financed emissions calculated using data obtained from clients/investees (optional)

100

(12.1.1.6) Emissions calculation methodology

Select from:

☑ GHG Protocol: A Corporate Accounting and Reporting Standard

(12.1.1.8) Financed emissions (metric unit tons CO2e) in the base year

11594615

(12.1.1.9) Base year end

12/30/2021

(12.1.1.10) % of undrawn loan commitments included in the financed emissions calculation

0

(12.1.1.11) Please explain the details of and assumptions used in your calculation

Portfolio emissions are calculated as follows: [Scope 1 and 2 emissions of portfolio companies] – [Scope 1 and 2 emissions of portfolio companies × equity share of Sabancı Holding in portfolio companies] – [Scope 1 and 2 emissions of portfolio companies × (1 – Holding's equity share)]. Sabancı Holding calculates its emissions arising from investments, including the not-owned share of the investee companies, in line with the GHG Protocol. Scope 1 and Scope 2 emissions of investee companies are included in Scope 1 and Scope 2 of Sabancı Holding after multiplying with equity share ratios. The (1 – equity share) ratios explained above are multiplied by emissions of investee companies and included in Scope 3 investment emissions of Sabancı Holding. Excerpt from CDP Technical Note: Portfolio Impact Metrics for Financial Services Sector Companies: "The GHG Protocol classifies these emissions in Scope 3 Category 15: Investments. They are also known as portfolio emissions or financed emissions. Put simply, they are emissions that occur at sources owned or controlled by other companies, but which are made possible because those companies are financed by the investment and lending (and insurance underwriting) of financial institutions; therefore, they can be thought of as caused indirectly by the financial institution and should be included in the financial institution's Scope 3 inventory."
[Fixed row]

(12.1.3) Provide details of the other metrics used to track the impact of your portfolio on the environment.

Climate change

(12.1.3.1) Portfolio

Select from:
☑ Investing (Asset owner)

(12.1.3.2) Portfolio metric

Select from:
☑ Carbon intensity (tCO2e/Million revenue)

(12.1.3.3) Metric value in the reporting year

16.72

(12.1.3.4) % of portfolio covered in relation to total portfolio value

100

(12.1.3.5) Total value of assets included in the calculation

3073678933000

(12.1.3.6) % of emissions calculated using data obtained from clients/investees

100

(12.1.3.7) Please explain the details and key assumptions used in your assessment

In order to measure the impact of Sabancı Holding portfolio to environment, we measure the GHG intensity of our investee companies, using the total Scope 1&2 value calculated with Equity Share approach. Sabancı Holding's total Scope 1 and scope 2 emissions was 9.7 million tons in 2024, calculated using equity share; and total combined revenue was TRY 581.8 billion. Calculation methodology: Total Scope 1&2 emissions of Sabancı Holding is divided by total combined revenue of holding; and the result is multiplied with 1 million to comply with requested unit of the metric.

Water

(12.1.3.1) Portfolio

Select from:

☑ Investing (Asset owner)

(12.1.3.2) Portfolio metric

Select from:

☑ Other metric for impact on water, please specify :Water intensity

(12.1.3.3) Metric value in the reporting year

15.09

(12.1.3.4) % of portfolio covered in relation to total portfolio value

100

(12.1.3.5) Total value of assets included in the calculation

3073678933000

(12.1.3.6) % of emissions calculated using data obtained from clients/investees

100

(12.1.3.7) Please explain the details and key assumptions used in your assessment

In order to measure to impact of Sabancı Holding portfolio to environment, we measure the water intensity of our investee companies, using the total water consumption. Sabancı Holding's total water consumption was 8.9 million cubic meters in 2024, and total combined revenue was 581.8 billion TL. Calculation methodology: Total water consumption of Sabancı Holding is divided by total combined revenue of holding; and multiplied by 1 million to comply with requested unit of the metric.

Biodiversity

(12.1.3.1) Portfolio

Select from:

☑ Investing (Asset owner)

(12.1.3.2) Portfolio metric

Select from:

☑ Other metric for impact on biodiversity, please specify :Ratio of facilities located in protected areas

(12.1.3.3) Metric value in the reporting year

29

(12.1.3.4) % of portfolio covered in relation to total portfolio value

32

(12.1.3.5) Total value of assets included in the calculation

3073678933000

(12.1.3.6) % of emissions calculated using data obtained from clients/investees

0

(12.1.3.7) Please explain the details and key assumptions used in your assessment

Within the various sectors, Sabancı Holding investee companies has facilities within the areas of biodiversity importance, or near areas. Total number of facilities within those areas, equals to 29% in the total number of facilities.
[Add row]

(12.2) Are you able to provide a breakdown of your organization's financed emissions and other portfolio carbon footprinting metrics?

	Portfolio breakdown
Investing (Asset owner)	*Select all that apply* ☑ Yes, by asset class ☑ Yes, by industry ☑ Yes, by scope

[Fixed row]

(12.2.1) Break down your organization’s financed emissions and other portfolio carbon footprinting metrics by asset class, by industry, and/or by scope.

Row 1

(12.2.1.1) Portfolio

Select from:

☑ Investing (Asset owner)

(12.2.1.2) Portfolio metric

Select from:

☑ Absolute portfolio emissions (tCO2e)

(12.2.1.3) Industry

Select from:

☑ Materials

(12.2.1.4) Asset class

Select from:

☑ Equity investments

(12.2.1.5) Clients'/investees' scope

Select from:

☑ Scope 1

(12.2.1.6) % of asset class emissions calculated in the reporting year based on total value of assets

100

(12.2.1.7) Value of assets covered in the calculation

71928545404

(12.2.1.8) Financed emissions or alternative metric

5393517

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

Select from:

☑ Not applicable

(12.2.1.12) Please explain the details, assumptions and exclusions in your calculation

Companies operating in the material technologies sectors have a total asset value of 7.19 billion TL in the reporting year, as stated in the "value of assets covered in the calculation" column, also published in the Sabancı Holding 2024 annual report.
[Add row]

(12.3) State the values of your financing and insurance of fossil fuel assets in the reporting year.

Investing all fossil fuel assets (Asset owner)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

☑ Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

25899000000

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

2

(12.3.6) Details of calculation

The value includes the net revenues from the following activities: CCGT and coal production activities. Percentage calculation is made as follows: total net revenue from carbon related assets mentioned above (i.e. 25 bn TRY) divided by total net revenues of Sabancı Holding (1.2 trillion TRY) in 2024.

Investing in thermal coal (Asset owner)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

☑ Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

8268000000

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

0.7

(12.3.6) Details of calculation

Total revenue generated from thermal coal activities, divided by total combined revenue of Holding.

Investing in met coal (Asset owner)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

☑ Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

0

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

0

(12.3.6) Details of calculation

Sabancı Holding does not invest in met coal operations

Investing in oil (Asset owner)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

☑ Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

0

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

0

(12.3.6) Details of calculation

Sabancı Holding does not operate in oil&gas industry.

Investing in gas (Asset owner)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

☑ Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

17631000000

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

1.4

(12.3.6) Details of calculation

Total revenue generated from gas activities, divided by total combined revenue of Holding.
[Fixed row]

(12.5) In the reporting year, did your organization finance and/or insure activities or sectors that are aligned with, or eligible under, a sustainable finance taxonomy? If so, are you able to report the values of that financing and/or underwriting?

Investing (Asset owner)

(12.5.1) Reporting values of the financing and/or insurance of activities or sectors that are eligible under or aligned with a sustainable finance taxonomy

Select from:

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

(12.5.35) Primary reason for not providing values of the financing and/or insurance

Select from:

☑ Other, please specify :(There is not yet a national taxonomy under development)

(12.5.36) Explain why you are not providing values of the financing and/or insurance

We are not currently providing values for the financing and/or insurance of activities or sectors that are eligible under or aligned with a sustainable finance taxonomy because the national taxonomy is still under development. Although our investee companies at Sabancı Holding are systematically tracking their EU Taxonomy eligible or aligned activities and products, we are unable to break down the revenues or financed amounts for these specific activities at this time. We are planning to integrate these details into the sustainability reports of the relevant companies within the next two years as the national taxonomy becomes fully operational. Meanwhile, we are using alternative classification systems to monitor and report on our sustainability performance.
[Fixed row]

(12.6) Do any of your existing products and services enable clients to mitigate and/or adapt to the effects of environmental issues?

	Existing products and services enable clients to mitigate and/or adapt to the effects of environmental issues
	Select from: ☑ Yes

[Fixed row]

(12.6.1) Provide details of your existing products and services that enable clients to mitigate and/or adapt to the effects of environmental issues, including any taxonomy or methodology used to classify the products and services.

Row 1

(12.6.1.1) Environmental issue

Select all that apply

☑ Climate change

☑ Water

(12.6.1.2) Product/service enables clients to mitigate and/or adapt to climate change

Select all that apply

☑ Mitigation

☑ Adaptation

(12.6.1.3) Portfolio

Select from:

☑ Investing (Asset owner)

(12.6.1.4) Asset class

Select from:

☑ Equity investments

(12.6.1.5) Type of product classification

Select all that apply

☑ Products that promote environmental and/or social characteristics

☑ Products that have sustainable investment as their core objective

(12.6.1.6) Taxonomy or methodology used to identify product characteristics

Select all that apply

☑ The EU Taxonomy for environmentally sustainable economic activities

☑ Internally classified

(12.6.1.7) Type of solution financed, invested in or insured

Select all that apply

☑ Renewable energy

☑ Other, please specify **:The products include a wide range of technologies given the diverse sectors that we operate in.**

☑ Low-emission transport

☑ Paperless/ digital service

☑ Green buildings and equipment

☑ Wastewater treatment infrastructure

(12.6.1.8) Description of product/service

The EU Taxonomy for environmentally sustainable economic activities.

(12.6.1.9) % of portfolio aligned with a taxonomy or methodology in relation to total portfolio value

14

(12.6.1.10) % of asset value aligned with a taxonomy or methodology

28

(12.6.1.11) Product considers principal adverse impacts on environmental factors

Select from:

☑ Yes

(12.6.1.12) Details on how the principal adverse impacts on environmental factors are considered in this product

Mitigation: Refers to products and services designed to directly reduce environmental resource usage and carbon emissions. Transition: Refers to products and services that, while resource- or carbon-intensive, contribute to the shift towards more sustainable technologies. Sabancı Holding has developed its own sustainable product methodology, called the "SDG Related Products and Services Taxonomy." This methodology references multiple frameworks, including the EU Taxonomy, which has been selected as a primary reference.
[Add row]

(12.7) Has your organization set targets for deforestation and conversion-free and/or water-secure lending, investing and/or insuring?

	Target set
Water	*Select from:* ☑ Yes, we have set water-secure lending, investing and/or insuring targets

[Fixed row]

(12.7.1) Provide details of your targets for deforestation and conversion-free and/or water-secure lending, investing and/or insuring.

Water

(12.7.1.1) Portfolio

Select from:

☑ Investing (Asset owner)

(12.7.1.2) Targets set

Select from:

☑ Targets for water-secure investments

(12.7.1.3) Date target was set

12/30/2024

(12.7.1.4) Sectors covered by the target

Select all that apply

☑ Services

☑ Materials

☑ Manufacturing

☑ Infrastructure

☑ Power generation

☑ Transportation services

(12.7.1.5) Asset classes covered by the target

Select all that apply

☑ Project finance

☑ Equity investments

(12.7.1.6) The target has been set with reference to

Select from:

☑ Sustainable Development Goals

(12.7.1.7) % of portfolio covered by the target in relation to total portfolio value

100

(12.7.1.8) Target metric

Select from:
☑ % of your portfolio value

(12.7.1.9) Target value

10

(12.7.1.10) End date of target

12/30/2030

(12.7.1.11) End date of base year

12/30/2024

(12.7.1.12) Figure in base year

13465088

(12.7.1.13) Figure in reporting year

11788300

(12.7.1.14) % of target achieved

12.45

(12.7.1.15) Provide details of the target

At Sabancı Group, we approach water as a core element of natural capital. It is essential not only for the continuity of our business operations, but also for the well-being of the communities we serve. We recognize that water supply disruption can adversely affect every part of our value chain and society at large. To proactively address these risks and strengthen our Group-wide water management practices, we completed a comprehensive water stewardship project. This initiative was designed to establish consistent definitions, methodologies, and performance metrics across all Group companies, aligned with each sector's specific water-related realities. As a first step, we worked with each company to clarify key concepts and define relevant indicators. This enabled us to establish a consistent and reliable baseline for water consumption, and to set realistic, measurable reduction targets. Following this, we introduced a Group-wide medium-term water reduction target and updated our baseline figures to reflect refined boundaries and definitions. This alignment ensures data accuracy and consistency across reporting periods. For existing assets, we have established the following roadmap for water: ○ Reduce freshwater withdrawal of the 2024 portfolio by 10% by 2030 ○ Reduce water consumption of the 2024 portfolio by 15% by 2030 ○ Integrate water management into investment due diligence and prioritize efficiency after acquisition.

Water

(12.7.1.1) Portfolio

Select from:

☑ Investing (Asset owner)

(12.7.1.2) Targets set

Select from:

☑ Targets for water-secure investments

(12.7.1.3) Date target was set

12/30/2024

(12.7.1.4) Sectors covered by the target

Select all that apply

☑ Services

☑ Materials

☑ Manufacturing

☑ Infrastructure

☑ Power generation

☑ Transportation services

(12.7.1.5) Asset classes covered by the target

Select all that apply

☑ Project finance

☑ Equity investments

(12.7.1.6) The target has been set with reference to

Select from:

☑ Sustainable Development Goals

(12.7.1.7) % of portfolio covered by the target in relation to total portfolio value

100

(12.7.1.8) Target metric

Select from:

☑ % of your portfolio value

(12.7.1.9) Target value

15

(12.7.1.10) End date of target

12/30/2030

(12.7.1.11) End date of base year

12/30/2024

(12.7.1.12) Figure in base year

9995201

(12.7.1.13) Figure in reporting year

8910472

(12.7.1.14) % of target achieved

10.85

(12.7.1.15) Provide details of the target

At Sabancı Group, we approach water as a core element of natural capital. It is essential not only for the continuity of our business operations, but also for the well-being of the communities we serve. We recognize that water supply disruption can adversely affect every part of our value chain and society at large. To proactively address these risks and strengthen our Group-wide water management practices, we completed a comprehensive water stewardship project. This initiative was designed to establish consistent definitions, methodologies, and performance metrics across all Group companies, aligned with each sector's specific water-related realities. As a first step, we worked with each company to clarify key concepts and define relevant indicators. This enabled us to establish a consistent and reliable baseline for water consumption, and to set realistic, measurable reduction targets. Following this, we introduced a Group-wide medium-term water reduction target and updated our baseline figures to reflect refined boundaries and definitions. This alignment ensures data accuracy and consistency across reporting periods. For existing assets, we have established the following roadmap for water: ○ Reduce freshwater withdrawal of the 2024 portfolio by 10% by 2030 ○ Reduce water consumption of the 2024 portfolio by 15% by 2030 ○ Integrate water management into investment due diligence and prioritize efficiency after acquisition.
[Add row]

C13. Further information & sign off

(13.1) Indicate if any environmental information included in your CDP response (not already reported in 7.9.1/2/3, 8.9.1/2/3/4, and 9.3.2) is verified and/or assured by a third party?

	Other environmental information included in your CDP response is verified and/or assured by a third party
	Select from: ☑ Yes

[Fixed row]

(13.1.1) Which data points within your CDP response are verified and/or assured by a third party, and which standards were used?

Row 1

(13.1.1.1) Environmental issue for which data has been verified and/or assured

Select all that apply

☑ Climate change

(13.1.1.2) Disclosure module and data verified and/or assured

Environmental performance – Climate change

☑ Waste data

☑ Fuel consumption

☑ Base year emissions

☑ Renewable Electricity/Steam/Heat/Cooling generation

☑ Year on year change in absolute emissions (Scope 3)

☑ Renewable Electricity/Steam/Heat/Cooling consumption

☑ Electricity/Steam/Heat/Cooling generation
☑ Electricity/Steam/Heat/Cooling consumption
☑ Year on year change in absolute emissions (Scope 1 and 2)

(13.1.1.3) Verification/assurance standard

General standards
☑ ISAE 3000

(13.1.1.4) Further details of the third-party verification/assurance process

NA

(13.1.1.5) Attach verification/assurance evidence/report (optional)

Sabancı Holding_Assurance.pdf
[Add row]

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

(13.2.1) Additional information

Sabancı Holding's greenhouse gas emissions have been verified through a limited assurance engagement conducted in accordance with the International Standard on Assurance Engagements (ISAE) 3000 (Revised) and the Assurance Engagements on Greenhouse Gas Statements (ISAE 3410). This has been explicitly stated in the verification statement. However, as the response fields of questions 7.9.1, 7.9.2, and 7.9.3 under the "Relevant standard" column allow only a single selection, ISAE 3000 has been marked. We would nevertheless like to emphasize that ISAE 3410 was also an integral part of our assurance process.

(13.2.2) Attachment (optional)

Sabancı Holding_Assurance.pdf
[Fixed row]

(13.3) Provide the following information for the person that has signed off (approved) your CDP response.

(13.3.1) Job title

Board Member and CEO

(13.3.2) Corresponding job category

Select from:
☑ Chief Executive Officer (CEO)
[Fixed row]

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

Select from:
☑ No