



AKENERJİ ELEKTRİK ÜRETİM A.Ş.

# 2024 CDP Corporate Questionnaire 2024

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.

[Terms of disclosure for corporate questionnaire 2024 - CDP](#)

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## C1. Introduction

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

#### (1.3.2) Organization type

Select from:

Publicly traded organization

#### (1.3.3) Description of organization

*Akenerji Elektrik Üretim A.Ş. (hereinafter referred to as Akenerji) established in 1989 as Türkiye's first electricity generation company with autoproducer group status. Akenerji operates as an independent power producer since 2005 and has grown to become a leading player in Türkiye's energy sector by 2021. Through a strategic partnership with Akkök Holding and CEZ Group, we have an installed capacity of 1,224 MW, equivalent to approximately 2.5% of Türkiye's total energy demand. Our gross electricity production is 4,202,448.9 MWh. This substantial capacity highlights Akenerji's crucial role in meeting national energy needs. Our diverse portfolio, which includes 1 natural gas combined cycle, 1 wind power plant, and 7 hydroelectric power plants, ensures robust diversity in energy sources and geographical coverage. Our strategic investments, driven by our commitment to the importance of renewable energy sources in combating climate change and considering Türkiye's long-term energy policies, have enabled us to maintain our competitive position in 2023. Through the commissioning of 1 wind power plant and 7 hydroelectric power plants between 2009 and 2012, our company achieved a renewable capacity of 320 MW by the end of 2023, enabling it to meet 26% of its total installed capacity from renewable sources. With planned investments in a 198 MW capacity hydroelectric power plant and a 6.21 MW capacity increase in the wind power plant, our renewable percentage will rise from 26% to 37%. Additionally, we are working on developing strategic investment plans for the installation of hybrid power plants at Erzin NGCCPP and Burç Bendi HPP. As Akenerji, we are fully aware of our responsibility to mitigate climate change. In 2011, we were one of the two energy companies in Türkiye to participate in the CDP Climate Change reporting. In addition, Akenerji is the first company from Türkiye to become a member of the European Energy Exchange, and we are an active member of the BIST Sustainability Index. We are now planning to implement emission reduction technologies to minimize environmental and societal risks associated with our operations. Our proactive approach and adherence to international standards drive our efforts in sustainable energy, ensuring a future focused strategy. As an active member of the UN Global Compact, Akenerji has collaborated with the Sustainability Committee to develop its 2021-2025 sustainability strategies, reviewing the needs and expectations of internal stakeholders to update priority areas which support the targets of the United Nations 17 SDGs. Additionally, we focus on protecting natural life and preventing environmental pollution in all operational processes, ensuring maximum energy production with minimal resource use. In 2023, we continue to assess climate change risks and opportunities while setting our strategic goals. Although Akenerji is not a signatory of the UN Principles for Responsible Investment, we actively incorporate its six principles into our investment decisions. We prioritize ESG policy adherence, transparently communicate long-term ESG decisions to shareholders, and ensure compliance with the UN Global Compact across all our operations. We also set expectations for our service providers to meet our ESG standards and participate in platforms like BIST Refinitiv to enhance our practices. Through a 'Comply or Explain' approach, we annually report on our progress, raising awareness among a broader group of stakeholders. Akenerji engages with a broad range of stakeholders, including employees, customers, creditors, investors, regulatory bodies, suppliers, local communities, authorities, society, and the media, through various dialogue platforms. These platforms include integrated management systems, the "We Are the Energy" Employee Suggestion System, customer satisfaction surveys, Environmental Impact Assessment reports, workshops, and more. Moreover, Akenerji has participated in the CDP Climate Change program since 2010 and has prepared annual sustainability reports according to GRI Standards since 2012. All of Akenerji's power plants have had ISO 9001:2015 Quality, ISO 45001:2018 Occupational Health and Safety, ISO 14001:2015 Environment Management Systems, and ISO 50001:2018 Energy Management System certifications since 2010. Akenerji, with 308 employees, integrates sustainability-focused activities into its stakeholder engagement. Our commitment to quality is demonstrated by the awards we received in 2023, including the GPTW Best Employers Award and the Silver Stevie Award for Employee Engagement. We have established a Sustainability Committee*



to oversee ESG activities, create and monitor necessary policies, and ensure compliance with the Sustainability Principles Compliance Framework. Our governance structure, overseen by the Board of Directors, supports the implementation of ESG initiatives and the development and monitoring of related policies.

[Fixed row]

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

**(1.4.1) End date of reporting year**

12/30/2023

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

Select from:

Yes

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

Select from:

Yes

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

Select from:

2 years

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

Select from:

2 years

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

Select from:

2 years

[Fixed row]

**(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: <input checked="" type="checkbox"/> 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**

TRAAKENR91L9

**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:

Yes

**(1.6.2) Provide your unique identifier**

"AKENR" has traded on Borsa İstanbul since 2000.

**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:

Yes

### (1.6.2) Provide your unique identifier

7890006JO4YATIQAG941

### 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]

**(1.16.1) For your electricity generation activities, provide details of your nameplate capacity and electricity generation specifics for each technology employed.**

### Coal - Hard

### (1.16.1.1) Own or control operations which use this power generation source

Select from:

No

### (1.16.1.5) Comment

*Not applicable.*

### Lignite

### (1.16.1.1) Own or control operations which use this power generation source

Select from:

No

### (1.16.1.5) Comment

*Not applicable.*

### Oil

### (1.16.1.1) Own or control operations which use this power generation source

Select from:



No

**(1.16.1.5) Comment***Not applicable.***Gas****(1.16.1.1) Own or control operations which use this power generation source**

Select from:

 Yes**(1.16.1.2) Nameplate capacity (MW)**

904

**(1.16.1.3) Gross electricity generation (GWh)**

3301.55

**(1.16.1.4) Net electricity generation (GWh)**

3234.58

**(1.16.1.5) Comment**

*We have one natural gas combined cycle power plant located in the Erzin district of Hatay province in Türkiye, which started operating in 2014. Erzin Natural Gas Combined Cycle Power Plant has three units with a total capacity of 904 MW, consisting of two gas turbines each with a capacity of 292 MW and one steam turbine with a capacity of 320 MW. Using advanced technology and high efficiency, the plant significantly contributes to Türkiye's energy needs. In 2023, the plant produced around 3,301,555 MWh of electricity, which is about 1.00% of Türkiye's total electricity consumption for the year. This contribution is crucial for Türkiye's energy supply security, as it helps diversify energy sources, making the country's energy system more stable and reliable.*

**Sustainable biomass****(1.16.1.1) Own or control operations which use this power generation source**

Select from:

 No**(1.16.1.5) Comment***Not applicable.***Other biomass****(1.16.1.1) Own or control operations which use this power generation source**

Select from:

 No

### **(1.16.1.5) Comment**

*Not applicable.*

### **Waste (non-biomass)**

#### **(1.16.1.1) Own or control operations which use this power generation source**

*Select from:*

No

### **(1.16.1.5) Comment**

*Not applicable.*

### **Nuclear**

#### **(1.16.1.1) Own or control operations which use this power generation source**

*Select from:*

No

### **(1.16.1.5) Comment**

*Not applicable.*

### **Fossil-fuel plants fitted with carbon capture and storage**

#### **(1.16.1.1) Own or control operations which use this power generation source**

*Select from:*

No

### **(1.16.1.5) Comment**

*Not applicable.*

### **Geothermal**

#### **(1.16.1.1) Own or control operations which use this power generation source**

*Select from:*

No

### **(1.16.1.5) Comment**

*Not applicable.*

### **Hydropower**

#### **(1.16.1.1) Own or control operations which use this power generation source**

Select from:

Yes

### (1.16.1.2) Nameplate capacity (MW)

292

### (1.16.1.3) Gross electricity generation (GWh)

814.47

### (1.16.1.4) Net electricity generation (GWh)

801.03

### (1.16.1.5) Comment

*Akenerji operates seven hydroelectric power plants located in various regions across Türkiye, emphasizing our commitment to renewable energy. These facilities include Bulam HPP with a total capacity of 7 MW, Burç Bendi HPP with 28 MW, Uluabat HPP with 100 MW, Feke II HPP with 70 MW, Feke I HPP with 30 MW, Gökkaya HPP with 30 MW, and Himmetli HPP with 27 MW. Bulam, Burç Bendi, Uluabat, and Feke II HPPs were commissioned in 2010 while Feke I, Gökkaya, and Himmetli HPPs were commissioned in 2012, enhancing the diversity of our renewable energy portfolio. The total installed capacity of our HPPs is 292 MW, which constitutes approximately 24% Akenerji's overall installed capacity of 1,224 MW. In 2023, these hydroelectric power plants produced a gross electricity of 814.47 GWh. This significant contribution from renewable hydroelectric power not only supports Türkiye's renewable energy goals but also strengthens the stability and reliability of our energy infrastructure. In line with our ongoing commitment to renewable energy, we are planning a substantial investment in a 198 MW hydroelectric power project, aimed at further contributing to Türkiye's renewable installed capacity targets and national objectives.*

## Wind

### (1.16.1.1) Own or control operations which use this power generation source

Select from:

Yes

### (1.16.1.2) Nameplate capacity (MW)

28

### (1.16.1.3) Gross electricity generation (GWh)

86.43

### (1.16.1.4) Net electricity generation (GWh)

84.81

### (1.16.1.5) Comment

*Ayyıldız Wind Power Plant, which we operate at Akenerji, was commissioned in 2009 and is located in the Bandırma district of Balıkesir, Türkiye. The power plant currently has a capacity of 28 MW. In 2023, it achieved a gross electricity production of 86.43 GWh. We have initiated efforts to increase the capacity of Ayyıldız Wind*

Power Plant by 6.2 MW, starting with the Environmental Impact Assessment process. Upon completion, the plant's increased capacity will enhance Akenerji's renewable energy contribution, providing a greater supply of clean energy to Turkey's national grid.

## Solar

### (1.16.1.1) Own or control operations which use this power generation source

Select from:

No

### (1.16.1.5) Comment

*Not applicable.*

## Marine

### (1.16.1.1) Own or control operations which use this power generation source

Select from:

No

### (1.16.1.5) Comment

*Not applicable.*

## Other renewable

### (1.16.1.1) Own or control operations which use this power generation source

Select from:

No

### (1.16.1.5) Comment

*Not applicable.*

## Other non-renewable

### (1.16.1.1) Own or control operations which use this power generation source

Select from:

No

### (1.16.1.5) Comment

*Not applicable.*

## Total

### (1.16.1.1) Own or control operations which use this power generation source

Select from:

Yes

### (1.16.1.2) Nameplate capacity (MW)

1224

### (1.16.1.3) Gross electricity generation (GWh)

4202.45

### (1.16.1.4) Net electricity generation (GWh)

4120.42

### (1.16.1.5) Comment

*Akenerji operates a diverse portfolio of power plants across Türkiye, including one natural gas combined cycle power plant, seven hydroelectric power plants, and one wind power plant. With a total installed capacity of 1,224 MW, our facilities are strategically located in various regions, enhancing the stability and reliability of the national energy grid. Our Erzin Natural Gas Combined Cycle Power Plant, with a capacity of 904 MW, contributes significantly to Türkiye's energy needs. Additionally, our seven hydroelectric power plants, with a combined capacity of 292 MW, and our Ayyıldız Wind Power Plant, with an existing capacity of 28 MW, underscore our commitment to renewable energy. Collectively, these facilities highlight Akenerji's dedication to diversifying energy sources, supporting the country's renewable energy goals, and enhancing energy supply security.*  
[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

### (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

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



*In 2023, Akenerji initiated a comprehensive mapping of its value chain, with a strategic focus on the upstream segment due to the nature of our business, particularly Tier 1 suppliers. This initiative is led by our Sustainability Committee and is integral to our approach for managing environmental dependencies, impacts, risks, and opportunities. The mapping process is designed to identify and assess these factors across all known upstream supplier tiers, ensuring alignment with Akenerji's sustainability standards. Our mapping process involves detailed data collection on the ESG practices of our suppliers, utilizing both internal systems and direct supplier engagement. We prioritize sustainable procurement practices to mitigate risks associated with resource scarcity and regulatory changes, which are critical to maintaining our electricity generation capabilities. Advanced tools such as geospatial analysis and stakeholder engagement are employed to enhance the accuracy and depth of our mapping. While Akenerji does not have downstream operations -since electricity distribution falls under government jurisdiction- our upstream mapping has been designed to integrate into our broader business strategy. This focus allows us to concentrate resources where we have the most significant impact, driving improvements in supply chain sustainability and operational resilience. We have mapped all upstream supplier tiers, and our efforts include a systematic assessment of suppliers' exposure to climate-related risks. Moreover, we are developing a Supplier Portal. This platform will centralize and expand the detailed information gathered during the mapping process, enabling continuous monitoring, engagement, and alignment with our sustainability standards. Recognizing the importance of transparency and stakeholder engagement, we are finalizing procedures for public disclosure of our mapping results ensuring all data is accurate, with a plan to share detailed outcomes with stakeholders in 2024. This will include insights into how our upstream operations contribute to broader environmental and social objectives, ensuring that our value chain mapping is not only comprehensive but also impactful. By focusing on upstream operations and integrating advanced methodologies into our process, we ensure that our approach is robust, transparent, and aligned with our long-term strategic goals.*

[Fixed row]

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

### **(1.24.1.1) Plastics mapping**

Select from:

No, but we plan to within the next two years

### **(1.24.1.5) Primary reason for not mapping plastics in your value chain**

Select from:

Not an immediate strategic priority

### **(1.24.1.6) Explain why your organization has not mapped plastics in your value chain**

*Akenerji is committed to environmental sustainability and adheres to Regulation on Zero Waste (Sıfır Atık Yönetmeliği) of Türkiye by conducting comprehensive waste segregation and implementing effective waste reduction initiatives. While we appropriately manage our waste and have established unit level waste reduction targets, mapping plastics within our direct operations or value chain is not an immediate strategic priority. Our core business operations, which involve the generation of electricity from natural gas, hydroelectric, and wind power plants do not involve the production, commercialization, use, or disposal of plastics. Consequently, we have not conducted a mapping analysis for plastics within our operations or value chain. Although plastics are not an operational priority for us, as a subsidiary of Akkök Holding, a signatory of the Business Plastics Initiative, Akenerji is committed to several specific actions. By 2025, we will implement practical training modules on waste segregation at our headquarters. Additionally, data on the annual purchase of plastics and the amount of plastic waste sent for recycling at our power plants will be systematically recorded and monitored. We aim to eliminate single-use plastics, such as plastic cups, straws, and bottles, at our power plants by the end of 2030. Although plastics are not a primary focus operationally, our sensitivity to this issue is evident through our support for both international and national organizations, including the Business Plastics Initiative. We are committed to assessing and addressing any emerging needs related to plastics mapping as part of our ongoing environmental sustainability efforts. Our waste management practices are in strict compliance with the Regulation on Zero*

*Waste, and we make effort to minimize waste generation through various sustainability initiatives. Our current efforts focus on investing in new renewable energy projects, and reducing greenhouse gas emissions. We continuously monitor and evaluate our environmental impact, ensuring adherence to regulatory requirements. If future assessments indicate the need for plastics mapping within our operations, we will implement the necessary measures to address this aspect.*

*[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)**

2

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

*Akenerji has adopted a comprehensive approach in all risk management processes, taking into account short, medium and long term time frames. These timeframes are in line with our corporate risk management and the same periods are taken as a basis in financial reporting and budgeting. Thus, a timely structure is created in our risk management and strategic planning processes and the operational and financial resilience of our company is increased. Our strategies for water risks, climate change impacts, uncertainties in the energy market and regulatory changes are developed and continuously updated in line with our corporate goals. Short Term (0-2 years): Corporate and Operational Impacts: In the short term, Akenerji focuses on risks arising from sudden changes in operational processes. These risks include water scarcity and changes in water quality, technical failures during power generation, price fluctuations in the energy market and regulatory changes. In the short term, risk management strategies have been developed to improve operational efficiency and organisational resilience. Risk Management and Opportunity: Short-term measures include energy efficiency projects, water management strategies and flexible operational planning to quickly adapt to market conditions. In addition, operational risks are minimised through continuous training of technical teams and innovative maintenance solutions.*

### **Medium-term**

#### **(2.1.1) From (years)**

2

#### **(2.1.3) To (years)**

5

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

*Medium Term (2-5 years): Strategic and Financial Impacts: In the medium term, in addition to water risks, physical risks due to climate change are taken into account in strategic planning together with market and political risks. During this period, strategic investments and innovative solutions are developed to ensure resilience against the impacts of climate change. In financial planning and budgeting, potential water and energy market fluctuations, carbon pricing and cost increases that new regulations may bring are taken into consideration. Risk Management and Opportunity: In the medium term, strategic steps are taken to strengthen water management and invest in*

renewable energy. In addition, long-term power purchase agreements (PPAs) and hedging strategies are implemented to protect against fluctuations in the energy market. For the management of financial risks, budget studies integrated with corporate risk management strategies are carried out.

## Long-term

### (2.1.1) From (years)

5

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

Select from:

No

### (2.1.3) To (years)

20

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

*Long Term (5-20 years): Strategic and Financial Impacts: In the long term, Akenerji assesses risks related to technological transformations and market dynamics in the energy sector, in addition to environmental risks such as climate change and sustainable management of water resources. Long-term risk scenarios play a critical role in shaping the Company's strategic roadmap and investment decisions. Reducing dependence on water and energy resources and investing in innovative energy technologies are among the long-term strategic priorities. Risk Management and Opportunity: In the long term, Akenerji aims to increase sustainable practices in water and energy management and reduce carbon emissions. Strategies are developed using advanced monitoring systems and innovative technologies for the management of climate change and environmental risks. In addition, in order to ensure sustainable growth in the energy sector, investments are made in renewable energy projects and financial models are created in line with sustainability principles.*

[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: <input checked="" type="checkbox"/> Yes	Select from: <input checked="" type="checkbox"/> 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: <input checked="" type="checkbox"/> Yes	Select from: <input checked="" type="checkbox"/> Both risks and opportunities	Select from: <input checked="" type="checkbox"/> 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

**(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

- Site-specific
- Local
- National

### (2.2.2.12) Tools and methods used

#### Commercially/publicly available tools

- LEAP (Locate, Evaluate, Assess and Prepare) approach, TNFD
- TNFD – Taskforce on Nature-related Financial Disclosures

#### Enterprise Risk Management

- Enterprise Risk Management

#### International methodologies and standards

- Environmental Impact Assessment
- ISO 14001 Environmental Management Standard

#### Databases

- Regional government databases

#### Other

- Scenario analysis consultation/analysis
- Desk-based research
- External consultants
- Materiality assessment
- Internal company methods
- Partner and stakeholder

### (2.2.2.13) Risk types and criteria considered

### Acute physical

- Drought

### Chronic physical

- Heat stress  Changing temperature (air, freshwater, marine water)
- Water stress
- Water quality at a basin/catchment level
- Increased severity of extreme weather events
- Water availability at a basin/catchment level

### Policy

- Carbon pricing mechanisms
- Changes to national legislation

### Market

- 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
- Negative press coverage related to support of projects or activities with negative impacts on the environment (e.g. GHG emissions, deforestation & conversion, water stress)

### Technology

- Dependency on water-intensive energy sources
- Transition to lower emissions technology and products

### Liability

- Non-compliance with regulations

## (2.2.2.14) Partners and stakeholders considered

Select all that apply

- Employees
- 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

*Akenerji's comprehensive approach to identify, assess and manage environmental dependencies, impacts, risks and opportunities is an integral part of its sustainability strategy. Utilising advanced tools and methodologies, aligning risk management with corporate strategy, encouraging continuous improvement and stakeholder engagement, Akenerji conducted facility-level assessments using international methodologies to better manage its operations by evaluating climate-related, dependency, impact, risk and opportunity management topics. Identification of Environmental Dependencies and Impacts Akenerji uses a structured approach to identify*



environmental dependencies and impacts, particularly water availability, biodiversity and ecosystem health, which are critical to its operations at hydroelectric, wind, solar and natural gas power generation facilities. As a result of the studies conducted for each facility using the TNFD (Task Force on Nature Related Financial Disclosures) methodology, heat maps for impacts and dependencies were created. The assessment includes a comprehensive analysis of each facility's natural capital dependencies, taking into account factors such as water resources (availability and quality), natural gas supply, infrastructure, labour and local community dependencies. For example, the dependency on water resources is assessed to be much higher for hydropower plants, while for wind power plants an acceptable level of dependency is defined depending on their location. Identification of Risks and Opportunities: Akenerji has adopted the TCFD (Taskforce on Climate-related Financial Disclosures) framework to identify risks and opportunities related to climate change. With the TCFD framework, Akenerji's climate-related risks (physical and transition risks) and opportunities were identified and analysed how these risks may affect the Company's financial and operational performance. In the assessments, the strategic, financial and operational impacts of physical risks such as water scarcity, interruptions in energy generation as a result of extreme weather events, as well as transition risks such as changes in legislation and regulations, being subject to carbon pricing mechanisms and investing in low-carbon technologies were evaluated. At the same time, opportunity areas such as renewable energy investments, energy efficiency projects and infrastructure investments that are resilient to climate change were identified, and efforts were initiated to integrate the identified opportunity areas into strategic planning processes. Methodology and Tools Used-TNFD and TCFD Integration: Akenerji uses TNFD and TCFD frameworks together to comprehensively assess its environmental dependencies and impacts and manage climate-related risks and opportunities. As a result of the studies carried out, these two frameworks have been harmonised with Akenerji's sustainability strategies and corporate decision-making processes. Tools such as ENCORE and WWF Biodiversity Risk Filter are used to assess dependencies on ecosystem services and environmental impacts, while scenario analyses for current data and medium and long-term data are used to determine the financial impacts of climate change-related risks and opportunities.

## 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

### (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*

- Site-specific
- Local
- National

### (2.2.2.12) Tools and methods used

#### **Commercially/publicly available tools**

- LEAP (Locate, Evaluate, Assess and Prepare) approach, TNFD
- TNFD – Taskforce on Nature-related Financial Disclosures
- WRI Aqueduct
- WWF Water Risk Filter

#### **Enterprise Risk Management**

- Enterprise Risk Management

#### **International methodologies and standards**

- Environmental Impact Assessment
- ISO 14001 Environmental Management Standard
- ISO 14046 Environmental Management – Water Footprint

#### **Databases**

- Regional government databases

**Other**

- Scenario analysis consultation/analysis
- Desk-based research
- External consultants
- Materiality assessment
- Internal company methods
- Partner and stakeholder

**(2.2.2.13) Risk types and criteria considered**

**Acute physical**

- Drought

**Chronic physical**

- Soil degradation and types (rain, hail, snow/ice)
- Declining water quality
- Increased ecosystem vulnerability
- Water availability at a basin/catchment level
- Changing temperature (air, freshwater, marine water)
- Changing precipitation patterns

**Policy**

- Increased difficulty in obtaining operations permits
- Poor coordination between regulatory bodies

**Market**

- Uncertainty in the market signals

**Reputation**

- Negative press coverage related to support of projects or activities with negative impacts on the environment (e.g. GHG emissions, deforestation & conversion, water stress)

**Technology**

- Dependency on water-intensive energy sources

**Liability**

- Non-compliance with regulations

**(2.2.2.14) Partners and stakeholders considered**

*Select all that apply*

- Employees
- 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

*At Akenerji, water is of critical importance as a performance indicator. Risks and vulnerabilities of water resources due to climate change are among our material issues. Akenerji carries out water-related impact, dependency, risk and opportunity assessments on a facility-specific basis. With different energy generation facilities in our portfolio. The assessments identified how water dependency and impacts differ for hydroelectric power plants (HEPP), wind power plant (WPP) and natural gas combined cycle power plant (CCGT), and the areas of risk and opportunities for water for each type of plant. Water quality, dependence on water resources and impacts differ for each power generation plant of Akenerji. (Considering location, size and generation segment criteria) Erzin Natural Gas Combined Cycle Power Plant (CCGT) Dependency: Erzin CCGT operating in Erzin, Hatay is dependent on seawater for cooling purposes. It has been determined that our plant activities are sensitive to the availability and quality of water. Impact: It has been assessed that the use of seawater in our operations may have thermal and chemical impacts on marine ecosystems. Possible increase in seawater temperature during the cooling process may affect marine life. Risk: It is foreseen that cooling efficiency will decrease and operational costs will increase with the increase in sea water temperatures. Necessary precautions have been taken for this situation, which is not very frequent in the location of operation. The facility provides continuous data to the national authority through continuous monitoring systems. Opportunity: It is aimed to reduce dependency on water resources and ensure operational sustainability by investing in technologies that will increase the efficiency of seawater cooling systems at the facility. Feke II Hydroelectric Power Plant (HEPP) Dependency Feke II HEPP in Adana is completely dependent on river water for electricity generation. Continuity of river flow and water quality are critical to the performance of the plant. Impact: Water use may result in habitat loss or modification in river ecosystems. In addition, dam structures can affect fish passage and other aquatic life. Risk: Reductions in river flow due to drought and climate change may adversely affect electricity generation capacity. This could lead to fluctuations in our financial performance and an increase in power generation costs. Opportunity: Our water-related impacts and discharges are kept under control to a significant extent through the strengthening of the facility infrastructure, production planning in line with meteorological data and projections, and emergency action plans we have prepared. Ayyıldız Wind Power Plant (WPP) Dependency: Ayyıldız WPP operating in Balıkesir is a renewable energy source that does not use water for electricity generation and therefore has no direct dependency on water resources. Impact: Our wind power plant has no direct impact on water resources. However, it has been assessed that there may be indirect impacts on local ecosystems during the construction process. Risk: There is no risk in terms of water dependency; however, indirect environmental impacts and potential impacts on local ecosystems are considered. Opportunity (Opportunity): As a renewable energy production method that is not dependent on water, it offers a sustainable energy solution in regions at risk of water scarcity.*

### Row 3

#### (2.2.2.1) Environmental issue

Select all that apply

Biodiversity

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

Select all that apply

Dependencies

Impacts

Risks

Opportunities

#### (2.2.2.3) Value chain stages covered

*Select all that apply*

- Direct operations
- Upstream value chain

#### (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*

- Site-specific
- Local
- National

#### (2.2.2.12) Tools and methods used

**Commercially/publicly available tools**

- Encore tool
- LEAP (Locate, Evaluate, Assess and Prepare) approach, TNFD
- TNFD – Taskforce on Nature-related Financial Disclosures

## **Enterprise Risk Management**

- Enterprise Risk Management

## **International methodologies and standards**

- Environmental Impact Assessment
- ISO 14001 Environmental Management Standard

## **Databases**

- Regional government databases

## **Other**

- Scenario analysis consultation/analysis
- Desk-based research
- External consultants
- Materiality assessment
- Internal company methods
- Partner and stakeholder

## **(2.2.2.13) Risk types and criteria considered**

### **Acute physical**

- Drought

### **Chronic physical**

- Change in land-use
- Changing temperature (air, freshwater, marine water)
- Increased ecosystem vulnerability
- Soil erosion
- Water availability at a basin/catchment level

### **Policy**

- Poor enforcement of environmental regulation

### **Reputation**

- Negative press coverage related to support of projects or activities with negative impacts on the environment (e.g. GHG emissions, deforestation & conversion, water stress)
- Stakeholder conflicts concerning water resources at a basin/catchment level

### **Technology**

- Data access/availability or monitoring systems

### **Liability**

- Non-compliance with regulations

## **(2.2.2.14) Partners and stakeholders considered**

*Select all that apply*

- Employees

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

*Akenerji's power generation facilities with different geographical distribution differ in terms of dependency, impacts, risks and opportunities related to biodiversity. Akenerji increases environmental sustainability and operational resilience through biodiversity monitoring and conservation programmes regarding impacts, dependencies, risks and opportunities on biodiversity, and investments in facilities and equipment with reduced environmental impacts. The following facility-based biodiversity assessments have been shared. Considering the operational diversity of Akenerji, WPP and Erzin CCGT assessments are presented. Ayyıldız Wind Power Plant (WPP) Dependency: Although Ayyıldız WPP is not directly dependent on biodiversity elements, the health and stability of ecosystems around the power plant constitutes an indirect dependency for the operational sustainability of the power plant. In particular, it has been assessed that bird species and flight routes in the vicinity of the power plant may be affected by the siting of wind turbines. Impact: Wind turbines can have direct impacts, particularly on the flight routes of birds and bats. The rotational movement of the turbines may pose vital hazards to these species and may have negative impacts on populations. Impact assessments have also included the area utilised during the construction phase of the turbines and the degradation of local habitats. Risk: The environmental impact assessment (ESIA) report of Ayyıldız WPP and the biodiversity risk maps for the region where it is in operation have been taken into consideration and habitat changes, bird flyways, local fauna and flora status have been assessed and no negative data regarding the deterioration of the ecological balance has occurred since the commissioning of the power plant. Opportunity: When commissioning new wind turbines, Akenerji invests in new turbine technologies that minimise potential negative impacts on the lives of birds and other living organisms. These investments reduce environmental impacts and contribute to the protection of biodiversity. Erzin Natural Gas Combined Cycle Power Plant (CCGT) Dependency: Erzin CCGT is not directly dependent on biodiversity elements, but indirectly dependent on the health of marine and coastal ecosystems in the vicinity where the plant operates. The cooling system based on seawater utilisation is directly related to seawater quality and ecosystems. Impact: The power plant may have potential negative impacts on marine ecosystems through seawater utilisation and thermal and chemical changes. It has been assessed that the cooling water discharge could change the temperature and chemical composition of seawater and adversely affect local marine life. Risk: Water use and discharge activities pose risks of altering ecosystem balance and function. Coastal habitats near the power plant may be affected by water use and discharge and may have negative impacts on ecosystem services. Opportunity: At the power plant, we use the water that draw from the sea with the reverse osmosis method as high-pressure steam through a high-tech treatment plant and as cooling water in the process in the turbines. With the good practice example we have implemented, we ensure operational efficiency while reducing our ecosystem impact due to water use and discharge.*

[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



*Akenerji assesses the links between environmental dependencies, impacts, risks and opportunities with an integrated and holistic approach. This assessment process is integrated into the Company's strategic goals, financial position and future plans. The relevant processes will be shared with the public in our report to be prepared within the scope of TSRS (Turkish Sustainability Reporting Standard), which is also compatible with IFRS S1 S2 to be published in 2025. As Akenerji, we have comprehensively analysed the dependence of our operations on natural capital (water resources, biodiversity, ecosystem services) and their impacts on these elements. For example, Ulubat HEPP is highly dependent on water resources and biodiversity, and regular monitoring programmes and water management strategies are implemented to assess impacts on these resources. While facilities such as Ayyıldız WPP are not directly dependent on water, they have been assessed in more detail for potential impacts on bird migration routes and local habitats. Analysing our environmental dependency and impacts has enabled us to identify our risk and opportunity areas related to nature and integrate these elements into our business strategy. During the reporting period, decision makers from production, finance, strategy, risk management and budget departments participated in TNFD (Taskforce on Nature-related Financial Disclosures) and TCFD (Taskforce on Climate-related Financial Disclosures) based workshops and the integration of DIROs into Akenerji's goals and strategies was evaluated with a holistic approach. Akenerji has achieved harmony and synergy at many points regarding its strategic goals in nature-based elements. The SPP and WPP investments and capacity increases, which are among the targets of our Company, will both reduce carbon emissions and contribute to the protection of biodiversity by reducing the pressure on water resources. Since SPP and WPP projects do not require the use of water, they create strategic synergies that reduce the pressure on water resources and protect biodiversity. Our company's biodiversity conservation projects and water management strategies contribute to both environmental sustainability and energy efficiency. The minimum environmental flow regime applied at hydroelectric power plants such as Uluabat HEPP ensures operational efficiency and protects the health of ecosystems. There are potential trade-offs between the goal of increasing the power generation capacity of hydroelectric power plants and the need to minimise negative impacts on water resources and biodiversity. As Akenerji, we optimise ecosystem health and energy generation capacity by using advanced water/drought modelling and ecological design elements such as fish passages to balance these trade-offs.*

[Fixed row]

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

### **(2.3.1) Identification of priority locations**

Select from:

- Yes, we have identified priority locations

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

Select all that apply

- Direct operations
- Upstream value chain

### **(2.3.3) Types of priority locations identified**

#### **Sensitive locations**

- Areas important for biodiversity
- Areas of limited water availability, flooding, and/or poor quality of water
- Areas of importance for ecosystem service provision

#### **Locations with substantive dependencies, impacts, risks, and/or opportunities**

- Locations with substantive dependencies, impacts, risks, and/or opportunities relating to water
- Locations with substantive dependencies, impacts, risks, and/or opportunities relating to biodiversity

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

We have adopted a materiality definition in accordance with the International Sustainability Standards Board (ISSB) guidelines and Global Reporting Initiative (GRI) impact materiality processes. Consistent with the Natural Capital Protocol Framework, a prioritisation assessment has been made for impacts and dependencies on nature, taking into account the value chain as far as available data allows. The descriptions are aligned with Goal 15 of the Global Biodiversity Framework, which advocates the need to assess and account for dependencies, impacts, risks and opportunities. In determining materiality, the assessment aims to align with the dual materiality approach, taking into account the potential importance of impacts on both business and society. Material nature and climate issues are also identified through our Strategic Risk and Opportunity Management processes and thus overseen as a component of our strategy and governance structures. The materiality of potential benefits and outcomes is assessed using our corporate strategic criteria, which include benchmarks for benefits and outcomes related to policy, market, technology, reputation and responsibility. Business benefits and outcomes are quantitative and materiality categories are defined as a percentage of net asset value (NAV). The Water Risk Filter physical risk layer represents both natural and human-induced conditions of river basins. It comprises four risk categories covering different aspects of physical risks: water scarcity, flooding, water quality, and ecosystem services status. Therefore, physical risks account for if water is too little, too much, unfit for use, and/or the surrounding ecosystems are degraded, and in turn, negatively impacting water ecosystem services. While the physical water risk for Ayyıldız WPP is at high level, this risk is at medium-high level for Erzin Natural Gas Combined Cycle Power Plant and Uluabat HEPP. Burç HEPP, Feke 1 HEPP, Feke 2 HEPP, Gökkaya HEPP, Bulam HEPP and Himmetli HEPP have moderate physical water risk. The Water Risk Filter reputational risk layer represents stakeholders' and local communities' perceptions on whether companies conduct business sustainably or responsibly with respect to water. It comprises four risk categories: cultural importance of water to local communities, freshwater biodiversity importance, media scrutiny/coverage of water-related issues, and risk of hydro-political conflicts in the river basins. Ayyıldız WPP, Erzin Natural Gas Combined Cycle Power Plant, Burç HEPP, Feke 1 HEPP, Feke 2 HEPP, Bulam HEPP and Gökkaya HEPP are assessed at very high level in terms of biodiversity risks. While Uluabat HEPP has a high biodiversity risk, this risk for Himmetli HEPP is in the high to very high level.

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

Select from:

- Yes, we will be disclosing the list/geospatial map of priority locations

### (2.3.6) Provide a list and/or spatial map of priority locations

Mapping Climate and Nature Risks-Akenerji.pdf  
[Fixed row]

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

### Risks

#### (2.4.1) Type of definition

Select all that apply

- Qualitative  
 Quantitative

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

Select from:

- Capital expenditures

### (2.4.3) Change to indicator

Select from:

- % decrease

### (2.4.4) % change to indicator

Select from:

- 1-10

### (2.4.6) Metrics considered in definition

Select all that apply

- Frequency of effect occurring

### (2.4.7) Application of definition

*The DIRO materiality map helps Akenerji identify the environmental impacts of its facilities in different locations and their potential impacts on operational sustainability. Considering the geographical location and ecological sensitivities of each facility, significant dependencies, impacts, risks and opportunities were assessed and prioritised areas were identified. Physical risks such as disruption of operations, delays in deliveries and damage to coastal facilities due to disasters such as river flooding and flooding as a result of extreme weather events such as storms or heavy rains were assessed separately for each power plant according to TCFD (physical and acute) methodology, and the frequency, severity and impact of extreme weather events were financially compensated. It has been determined that financial impact against risk, which is assessed as medium long term, is at low impact level. Even if the impact is low in the reporting period, our Company anticipates that the impact and severity of the related risk will increase due to climate change and anticipates that it will face a higher financial impact as a provision and risk response in the future. In this context, our Company carries out regular maintenance and inspections to prevent equipment breakdowns against extreme weather conditions. Flood barriers and drainage systems applications for river floods and rain management, emergency response plans for severe weather events are constantly updated. In addition, continuous monitoring of weather forecasts and the use of early warning systems are also among our practices. In order for our employees to make agile decisions in the face of relevant risks, training programmes have been prepared for employees on safety protocols during extreme weather conditions. In case of a possible disaster, co-operation is established with local authorities for a coordinated disaster response and management.*

## Opportunities

### (2.4.1) Type of definition

Select all that apply

- Qualitative
- Quantitative

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

Select from:

- Production capacity

### (2.4.3) Change to indicator

Select from:

- % increase

#### (2.4.4) % change to indicator

Select from:

21-30

#### (2.4.6) Metrics considered in definition

Select all that apply

Time horizon over which the effect occurs

#### (2.4.7) Application of definition

*Akenerji's orientation towards renewable energy and new technologies plays an important role in combating climate change. These investments in energy generation technologies that reduce carbon emissions minimise Akenerji's carbon footprint and contribute to environmental sustainability goals. The low-carbon strategic orientation facilitates the Company's compliance with low-carbon economy targets in the energy market, regulatory requirements and environmental standards. Akenerji diversifies its investments to ensure a significant increase in renewable energy in its portfolio. In addition to existing hydroelectric power plants, wind and solar energy investments, Akenerji invests in innovative technologies such as hybrid power plants and battery storage systems. In 2023, activities were initiated to increase the capacity of Ayyıldız Wind Power Plant by 6.2 MW. When the activities are completed, the total capacity of the plant is planned to increase to 34.4 MW. Studies are being carried out for the installation of hybrid power plants in our existing power plants, particularly Erzin CCGT, Burç Bendi HEPP. The State Hydraulic Works Project approval procedures for the Kemah Hydroelectric Power Plant project with an installed capacity of 198 MW, which is planned to be established in Erzincan province and is expected to generate an average of 560 GWh of electricity per year, were completed in 2017. With the commissioning of the power plant, we will significantly increase the ratio of our renewable energy generation capacity in the portfolio. Hybrid power plants and battery storage investments play a key role in increasing Akenerji's energy generation capacity and operational flexibility. Hybrid power plants help to ensure energy supply security and increase energy production efficiency by combining different renewable energy sources. Battery storage systems increase energy storage capacity, stabilise fluctuations in energy demand and guarantee uninterrupted energy supply. These technologies are planned with the aim of minimising energy losses while optimising Akenerji's energy production. These investments in renewable energy and new technologies increase Akenerji's total asset value and installed capacity, positively affect its turnover and strengthen its financial performance. The increase in revenue from renewable energy sources supports the Company's competitiveness in the energy market and sustainable growth targets.*

[Add row]

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

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

Select from:

Yes, we identify and classify our potential water pollutants

#### (2.5.2) How potential water pollutants are identified and classified

*Akenerji identifies and classifies potential water pollutants through a comprehensive process aligned with ISO 14001 standards and national regulations, including the Environmental Permit and License Regulation, Water Pollution Control Regulation, and EIA requirements. Pollutants are identified using a combination of risk*

assessments and environmental impact analyses, focusing on their potential to harm water ecosystems and human health. These pollutants are categorized into groups such as heavy metals (e.g. Ni, Zn, Hg, Pb, Cr), organic pollutants, coliform bacteria, and other critical parameters like pH and temperature. At Erzin NGCCPP, wastewater from the plant, including domestic wastewater, cooling water, and seawater reverse osmosis system discharge, is collected in a pit and monitored to ensure it meets deep-sea discharge limits. Wastewater is monitored both through periodic sampling and in real-time via the Ministry of Environment, Urbanization and Climate Change's Continuous Wastewater Monitoring System (SAIS). Seawater quality is monitored and analyzed twice a year as part of the EIA commitment, and concentration or level of 61 parameters are regularly monitored throughout the year according to the environmental permit, with the frequency varying based on the discharge location. Akenerji also monitors water quality at its HEPPs, where the availability and quality of water are crucial for electricity generation.

[Fixed row]

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

### **Row 1**

#### **(2.5.1.1) Water pollutant category**

Select from:

Oil

#### **(2.5.1.2) Description of water pollutant and potential impacts**

At the Erzin CCGT, oil pollutants primarily originate from the operation and maintenance of machinery and cooling systems used in the power generation process. These oils can include lubricants and hydraulic fluids essential for the smooth functioning of equipment. If not properly managed, these substances can be released into the environment through leaks or spills. Once in the water, oil forms a surface layer that significantly reduces oxygen exchange between the water and the atmosphere, causing to oxygen depletion. This can result in the suffocation of aquatic life, disruption of ecosystems, and long term contamination of water bodies. Additionally, oil pollution poses serious risks to human health if it contaminates drinking water sources or enters the food chain through bioaccumulation.

#### **(2.5.1.3) Value chain stage**

Select all that apply

Direct operations

#### **(2.5.1.4) Actions and procedures to minimize adverse impacts**

Select all that apply

Industrial and chemical accidents prevention, preparedness, and response

Discharge treatment using sector-specific processes to ensure compliance with regulatory requirements

Upgrading of process equipment/methods

Other, please specify :Compliance with national legislation, storage, disposal/recovery methods Compliance with Internal Procedures (The CVR/PR 002 - Environmental Accident and Complaint Reporting Procedure)

#### **(2.5.1.5) Please explain**

At Erzin NGCCPP, Akenerji minimizes the adverse impacts of oil pollutants through a comprehensive strategy that includes spill prevention, discharge treatment, and strict compliance with national regulations and internal



procedures, specifically the "CVR/PR 002 - Environmental Accident and Complaint Reporting Procedure" of Akenerji. Waste oil generated during electricity production at Erzin is reused where possible, with any remaining oil stored according to waste management regulations and sent to licensed recycling companies. Water mixed with rainwater is treated in Erzin's industrial wastewater treatment plant before discharge. Spill prevention is managed through regular maintenance, inspections, and emergency response drills. Environmental incidents, such as spills or leaks, are categorized into three levels (1st, 2nd, and 3rd category accidents), with response managed according to the internal procedure. Spill prevention is managed through regular maintenance, inspections, and emergency response drills. Oil-contaminated water is treated using oil-water separators to meet stringent discharge standards. The success of these measures is monitored in real-time via the Ministry of Environment's Continuous Wastewater Monitoring System (SAIS). Environmental audits and key performance indicators, such as the number of incidents, volume of oil recovered, and compliance with discharge regulations, are tracked to assess effectiveness and guide continuous improvement.

### Row 3

#### (2.5.1.1) Water pollutant category

Select from:

- Pathogens

#### (2.5.1.2) Description of water pollutant and potential impacts

Pathogens, including bacteria such as fecal coliforms, viruses, and other microorganisms, can originate from wastewater discharges, particularly from domestic wastewater treatment processes at Erzin CCGT In Erzin, wastewater from the domestic wastewater treatment plant, along with cooling water, industrial wastewater, and seawater reverse osmosis system discharge, is collected in a discharge pit and treated to meet deep-sea discharge standards. If the pathogens in that wastewater are not effectively treated, they could enter water bodies, posing significant risks to human health and local ecosystems. Contaminated water can lead to waterborne diseases, affecting local communities and potentially causing severe ecological impacts by disrupting aquatic life and promoting the spread of invasive species. This pathogen pollution is particularly hazardous in areas where water is used for drinking, recreation, or irrigation, as these organisms can persist in the environment, leading to long-term public health risks and ecological degradation.

#### (2.5.1.3) Value chain stage

Select all that apply

- Direct operations

#### (2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply

- Industrial and chemical accidents prevention, preparedness, and response
- Discharge treatment using sector-specific processes to ensure compliance with regulatory requirements
- Other, please specify :Compliance with national legislation and discharge methods Compliance with Internal Procedures (The CVR/PR 002 - Environmental Accident and Complaint Reporting Procedure)

#### (2.5.1.5) Please explain

At Erzin NGCCPP, pathogens are managed through wastewater treatment processes designed to remove or neutralize harmful microorganisms before discharge. Regular monitoring of effluent quality, including testing for fecal coliforms and other indicators, helps ensure compliance and early detection of potential issues. In the event of a system failure, spill, or accident, Akenerji follows the CVR/PR 002 - Environmental Accident and Complaint Reporting Procedure, which categorizes incidents into three levels and ensures an appropriate and swift response, including immediate shutdown procedures and the use of backup treatment systems to prevent the

release of untreated wastewater. The effectiveness of these procedures is evaluated through continuous environmental monitoring, regular audits, and performance indicators such as pathogen reduction rates and compliance with discharge permits. With these measures, we aim to protect human health and the environment.

## Row 4

### (2.5.1.1) Water pollutant category

Select from:

- Inorganic pollutants

### (2.5.1.2) Description of water pollutant and potential impacts

Inorganic pollutants, including heavy metals like nickel (Ni), zinc (Zn), mercury (Hg), lead (Pb), chromium (Cr), can originate from industrial processes at Akenerji's Erzin NGCCPP. These pollutants are toxic to aquatic life even at low concentrations and can persist in the environment, bioaccumulating in organisms and posing significant risks to both ecosystems and human health through contaminated water supplies. The long term presence of these substances can lead to the degradation of water quality, harming biodiversity and impacting the health of local communities relying on these water resources.

### (2.5.1.3) Value chain stage

Select all that apply

- Direct operations

### (2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply

- Industrial and chemical accidents prevention, preparedness, and response
- Discharge treatment using sector-specific processes to ensure compliance with regulatory requirements
- Other, please specify :Compliance with national legislation and discharge methods Compliance with Internal Procedures (The CVR/PR 002 - Environmental Accident and Complaint Reporting Procedure)

### (2.5.1.5) Please explain

At Erzin NGCCPP, the management of inorganic pollutants such as lead, mercury, and chromium is carried out through the treatment processes. Regular audits and assessments of critical infrastructure are performed to identify and address potential risks, such as leaks or spills, that could lead to environmental contamination. Our company also employs an integrated waste management system to safely handle and dispose of materials containing inorganic pollutants. The effectiveness of these measures is closely monitored through real-time data analysis, environmental audits, and key performance indicators, such as compliance with discharge permits and the volume of pollutants removed. With all these measures, Akenerji aims to protect water ecosystems and ensure the safety of surrounding communities.

## Row 5

### (2.5.1.1) Water pollutant category

Select from:

- Other nutrients and oxygen demanding pollutants

### (2.5.1.2) Description of water pollutant and potential impacts

At Erzin NGCCPP, pollutants such as Chemical Oxygen Demand (COD) and Biochemical Oxygen Demand (BOD) are significant indicators of organic matter in wastewater. These pollutants demand oxygen as they break down, leading to oxygen depletion in receiving water bodies. This reduction in oxygen levels can severely impact aquatic life, causing the death of fish and other organisms, and disrupt the balance of ecosystems. High levels of COD and BOD also indicate the presence of organic pollutants that can contribute to eutrophication, leading to excessive algal growth, which further depletes oxygen and harms water quality. These effects can be particularly detrimental in areas where water is critical for drinking, agriculture, and maintaining biodiversity.

### (2.5.1.3) Value chain stage

Select all that apply

- Direct operations

### (2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply

- Industrial and chemical accidents prevention, preparedness, and response
- Discharge treatment using sector-specific processes to ensure compliance with regulatory requirements
- Other, please specify :Compliance with national legislation and discharge methods Compliance with Internal Procedures (The CVR/PR 002 - Environmental Accident and Complaint Reporting Procedure)

### (2.5.1.5) Please explain

At our hydroelectric power plants and Erzin NGCCPP, COD and BOD levels are managed through comprehensive wastewater treatment processes that include sector-specific methods to ensure compliance with regulatory requirements. These treatments are designed to significantly reduce organic pollutants before discharge. Also, Akenerji adheres to strict national legislation and internal procedures, including the CVR/PR 002 - Environmental Accident and Complaint Reporting Procedure. This procedure categorizes incidents and ensures a prompt response to any environmental accidents, including those that may affect wastewater quality. Wastewater is carefully stored and managed, with disposal and recovery methods aligned with national standards. The success of these measures is monitored through real-time data analysis, regular environmental audits, and performance indicators such as COD and BOD reduction rates, compliance with discharge permits, and the number of reported incidents.

## Row 6

### (2.5.1.1) Water pollutant category

Select from:

- Other, please specify :pH

### (2.5.1.2) Description of water pollutant and potential impacts

pH levels that are outside the optimal range can cause significant stress or death to aquatic life, affect the solubility and toxicity of heavy metals, and disrupt the overall balance of ecosystems. In water bodies receiving discharges from Akenerji's operations, including both Erzin NGCCPP and hydroelectric power plants, fluctuations in pH could lead to these adverse effects, making pH a critical parameter to manage. Such imbalances can also impact the effectiveness of wastewater treatment processes and the ecological health of rivers and reservoirs associated with HEPPs.

### (2.5.1.3) Value chain stage

Select all that apply

- Direct operations



#### (2.5.1.4) Actions and procedures to minimize adverse impacts

*Select all that apply*

- Industrial and chemical accidents prevention, preparedness, and response
- Discharge treatment using sector-specific processes to ensure compliance with regulatory requirements
- Other, please specify :Compliance with national legislation and discharge methods Compliance with Internal Procedures (The CVR/PR 002 - Environmental Accident and Complaint Reporting Procedure)

#### (2.5.1.5) Please explain

*At our facilities, including Erzin NGCCPP and hydroelectric power plants, pH levels are managed through precise monitoring and treatment processes to ensure that discharges meet regulatory requirements. Sector-specific processes are employed to maintain pH within optimal ranges. Akenerji also implements integrated monitoring systems that provide real-time data on pH levels, allowing for immediate adjustments if deviations occur. Compliance with national legislation and internal procedures, including the CVR/PR 002 - Environmental Accident and Complaint Reporting Procedure, ensures that any incident affecting pH levels is promptly addressed. The success of these actions is evaluated through continuous monitoring, regular audits, and performance indicators, such as the frequency of pH excursions and compliance with discharge permits. These measures are critical for protecting aquatic ecosystems and maintaining water quality standards.*

*[Add row]*

## C3. Disclosure of risks and opportunities

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

### Climate change

#### (3.1.1) Environmental risks identified

Select from:

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

### Water

#### (3.1.1) Environmental risks identified

Select from:

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

### Plastics

#### (3.1.1) Environmental risks identified

Select from:

No

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

Select from:

Not an immediate strategic priority

#### (3.1.3) Please explain

*Akenerji has not identified any environmental risks related to plastics that have had a substantive effect on our organization. This conclusion is based on the nature of our core business operations, which focus on the generation of electricity from natural gas, hydroelectric, and wind power plants. These operations do not involve the production, commercialization, use, or disposal of plastics, thus minimizing the relevance of plastics as a source of environmental risk within our direct operations and value chain. Our commitment to environmental sustainability is evident through our adherence to the Regulation on Zero Waste (Sıfır Atık Yönetmeliği) in Türkiye, where we conduct comprehensive waste segregation and implement effective waste reduction initiatives. We have established unit-level waste reduction targets and manage our waste responsibly; however, due to the limited interaction with plastics in our operational activities, plastics do not present a significant environmental risk that would warrant detailed mapping or risk assessment at this time. As a subsidiary of Akkök Holding, which is a signatory of the Business Plastics Initiative, Akenerji is still committed to addressing the issue of plastic waste in a broader context. By 2025, we plan to introduce practical training modules on waste segregation at our headquarters and systematically record data on the annual purchase of plastics and the amount of plastic waste sent for recycling at our power plants. We also aim to eliminate single-use plastics, such as plastic cups, straws, and bottles, at our power plants by the end of 2030. These actions reflect our sensitivity to environmental issues,*

even though plastics do not currently pose a substantive risk to our operations. In summary, we maintain a proactive approach in monitoring our environmental impact and, if future assessments indicate emerging risks related to plastics, we will take appropriate measures to address them in alignment with our ongoing commitment to sustainability.

[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

#### Policy

Carbon pricing mechanisms

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

Select from:

Direct operations

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

Select all that apply

Turkey

### (3.1.1.9) Organization-specific description of risk

*This risk is potentially present for the Turkish Electricity Markets towards the ETS Emissions Trading System. Our current expectation is that carbon pricing will be activated as of 2026 and we expect these prices to be equal to European carbon prices in a 5-year period, from 10/ton levels (initially calculated by taking into account the free allocations to be given to power plants and factories parallel to the system in Europe). Although carbon costs are an important expense item for Erzin power plant, when all fossil fuelled power plants are considered and when we take into account that the carbon emission per unit electricity generation of Lignite and Imported Coal Power Plants in Turkey is higher than Natural Gas power plants, these carbon costs will also be reflected in market prices and the revenues of Erzin power plant are expected to increase. The increase in revenue will be utilised for technological transformations, reduction of emission intensity and increasing the weight of renewable energy in our portfolio. As Akenerji, we have evaluated the related risk as transition and market risk within the scope of TCFD methodology and included it in our risk inventory. Within the scope of our studies within the scope of risk, we calculate and verify our greenhouse gas data. Operations, production and risk departments carry out joint studies for price projections.*

### (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

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

Select from:

- Virtually certain

### **(3.1.1.14) Magnitude**

Select from:

- Medium-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 introduction of the carbon trading system plays an important role in Akenerji's financial planning both directly and indirectly. Direct impacts will arise as carbon costs increase the Company's operational expenses. However, the increase in market prices due to high carbon emissions in coal and lignite power plants may increase Akenerji's revenues from natural gas power plant operations. In terms of financial planning, Akenerji takes long-term strategic steps to manage the risks associated with the carbon trading system and takes measures to minimise the impact of carbon costs. These measures include investments to increase energy efficiency, transition to low-carbon power generation projects and financial planning in line with carbon pricing.*

### **(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)**

0

### **(3.1.1.25) Explanation of financial effect figure**

*This figure is based on estimates of the potential introduction of the Emissions Trading System in Turkey and the introduction of the carbon tax in 2026. Carbon prices are expected to start at 10/ton and reach European levels (approximately 80-100/ton) within 5 years. This will result in significant cost increases at Akenerji's Erzin Natural Gas Combined Cycle Power Plant depending on the annual generation capacity. However, revenues are also expected to increase due to the increase in market prices. Pricing is based on current EUA Carbon futures market prices. In our latest pricing study, we expect carbon markets to be active as of 2026. In the established system, we are expecting 85% free allowance in the first year, 70% free allowance in the second year and a gradual decrease in free allowances in the following years for our covered company. According to the 2053 net zero plan in Turkey's NDC document, emissions are expected to peak in 2038. In line with national projections, our*

projection for the future ETS is that free allowances will be gradually reduced and terminated before the peak year.

### (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

0

### (3.1.1.28) Explanation of cost calculation

Akenerji uses various methodologies such as carbon cost calculations, market loss analyses, capital and operational investment assessments to calculate the financial impacts of carbon pricing risk. In this process, renewable energy investments and carbon reduction strategies are aimed at minimising financial risks by increasing the Company's resilience against carbon prices.

### (3.1.1.29) Description of response

In order to manage the risk of being subject to the carbon trading system, Akenerji develops carbon reduction strategies and increases its renewable energy investments. The Company aims to minimise the financial impact of these risks by increasing energy efficiency and reducing carbon emissions. In addition, the Company is engaged in advanced strategic planning to better adapt to market conditions when the carbon pricing system is introduced in Turkey. Akenerji is also developing transition projects to lower carbon energy sources to minimise carbon emissions at Erzin Power Plant. The Company's financial planning is based on being prepared for the carbon trading system with such projects.

## Water

### (3.1.1.1) Risk identifier

Select from:

- Risk1

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

#### Chronic physical

- Changing precipitation patterns and types (rain, hail, snow/ice)

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

Select from:

- Direct operations

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

Select all that apply

- Turkey

### (3.1.1.7) River basin where the risk occurs

Select all that apply

- Other, please specify :turkey

### (3.1.1.9) Organization-specific description of risk

Impacts assessed within the scope of risk include operational interruptions, damage repairs and shipment delays due to extreme weather events at hydroelectric power plants. River floods and inundations may cause damage to facilities and thus production losses. While the physical water risk for Ayyıldız WPP is at high level, this risk is at medium-high level for Erzin Natural Gas Combined Cycle Power Plant and Uluabat HEPP. Burç HEPP, Feke 1 HEPP, Feke 2 HEPP, Gökkaya HEPP, Bulam HEPP and Himmetli HEPP have moderate physical water risk.

### (3.1.1.11) Primary financial effect of the risk

Select from:

- Decreased revenues due to reduced demand for products and services

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

Select all that apply

- Medium-term

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

Select from:

- Very likely

### (3.1.1.14) Magnitude

Select from:

- Medium-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

Operational interruptions due to extreme weather events may adversely affect Akenerji's operating income. In particular, river floods and heavy rains may cause production interruptions in hydroelectric power plants and halt energy production. At the same time, maintenance and repair costs will increase due to possible damages to facilities, which will put pressure on OPEX (operational expenditures). The events that will occur within the scope of this risk require us to allocate more resources to risk management and insurance costs in our financial planning. Increased insurance costs may put additional pressure on capital investments and may result in revenue losses due to cessation of operations. The volatility of energy production based on renewable energy sources such as wind and solar may affect Akenerji's revenue forecasts by complicating production forecasts. In addition, fluctuations in the production capacity of hydroelectric power plants due to hydrological conditions may cause operational interruptions and thus fluctuations in energy supply. This may lead to volatile energy prices in the markets, which may adversely affect Akenerji's financial performance.

### (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)

0

### (3.1.1.25) Explanation of financial effect figure

*Operational interruptions due to extreme weather events may adversely affect Akenerji's operating income. In particular, river floods and heavy rains may cause production interruptions in hydroelectric power plants and halt energy production. At the same time, maintenance and repair costs will increase due to possible damages to facilities, which will put pressure on OPEX (operational expenditures). Events within the scope of BRisk require us to allocate more resources to risk management and insurance costs in our financial planning. Increased insurance costs may put additional pressure on capital investments and may result in revenue losses due to cessation of operations.*

### (3.1.1.26) Primary response to risk

#### **Infrastructure, technology and spending**

- Improve maintenance of infrastructure

### (3.1.1.27) Cost of response to risk

0

### (3.1.1.28) Explanation of cost calculation

*The estimated cost for measures such as installation of flood barriers, drainage systems, emergency plans and early warning systems to manage these risks. The cost includes regular maintenance programmes, installation of flood barriers, updating of drainage systems, emergency plans, installation of early warning systems and employee training programmes.*

### (3.1.1.29) Description of response

*Akenerji has developed strategies to minimise these risks through measures taken against extreme weather events. The measures taken in this context are as follows: Regular Maintenance and Inspection of Equipment: In order to prevent equipment failures in extreme weather conditions, regular maintenance and inspection of equipment in power plants are carried out. This ensures safe and efficient operation of the equipment. Flood Barriers and Drainage Systems: Flood barriers and drainage systems have been installed at the plants for river flooding and rainwater management. These systems are among the critical measures to prevent water overflow and damage to facilities. Emergency Response Plans: Emergency response plans are prepared and implemented to minimise operational interruptions during severe weather events. These plans ensure rapid response to incidents and the safe cessation of operations. Employee Training Programmes: Employees are regularly trained to act in accordance with safety protocols during extreme weather conditions. These trainings ensure that the personnel take the right precautions and act safely during a crisis. Early Warning Systems: Continuous monitoring of weather forecasts and the use of early warning systems ensure that possible extreme weather events are predicted in advance and necessary measures are taken accordingly. Co-operation with Local Authorities: In order to ensure a rapid and coordinated response in case of possible disasters, co-operation is established with local authorities. This ensures effective utilisation of regional and local resources during disaster response.*

## **Climate change**



### (3.1.1.1) Risk identifier

Select from:

- Risk2

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

**Technology**

- Transition to lower emissions technology and products

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

Select from:

- Direct operations

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

Select all that apply

- Turkey

### (3.1.1.9) Organization-specific description of risk

*Budgets allocated for decarbonisation projects are carefully planned and managed. By applying detailed financial analyses and budgeting processes, the Company is prepared for high cost risks and ensures the financial sustainability of the projects. In addition, detailed evaluation and feasibility analyses are carried out in order to select the most appropriate projects, taking into account the cost effectiveness, potential return and risk profile of the projects. All relevant units and employees within the company are regularly informed and trained on the importance and potential risks of decarbonisation projects. Legislation and policy regulations related to renewable energy projects and decarbonisation efforts are continuously monitored and complied with. Finally, energy efficiency is increased and costs are reduced through the integration of new technologies and innovative solutions. Kemah HEPP and hybrid SPP projects aim to balance the portfolio and ensure energy supply security. The related risk has been assessed according to TCFD and assessed as transition and market risk. The risk is included in the Corporate Risk Inventory and is among the risks that are constantly monitored as the risk level is medium-high.*

### (3.1.1.11) Primary financial effect of the risk

Select from:

- Increased capital expenditures

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

Select all that apply

- Medium-term

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

Select from:

- Likely

### (3.1.1.14) Magnitude



Select from:

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

*Carbon prices may affect energy demand. Changes in demand may affect market dynamics and thus Akenerji's revenue projections. These analyses are performed using scenario modelling. Akenerji evaluates capital expenditures for renewable energy projects to reduce carbon costs. In this evaluation, the cost-effectiveness of investments is analysed using financial instruments such as net present value (NPV) and internal rate of return (IRR).*

### (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)

0

### (3.1.1.25) Explanation of financial effect figure

*Akenerji's battery storage investments are included in the investment plan to support decarbonised energy supply and provide operational flexibility. These investments play a critical role in the strategy to mitigate climate-related risks. In particular, they are planned to cope with the uncertainties brought about by climate change and production fluctuations of renewable energy sources. Battery storage investments will increase Akenerji's energy supply security and reduce the risk of climate-related supply interruptions, while ensuring that excess energy production is stored and utilised during periods of high demand.*

### (3.1.1.26) Primary response to risk

#### **Diversification**

Develop new products, services and/or markets

### (3.1.1.27) Cost of response to risk

0

### (3.1.1.28) Explanation of cost calculation

*Akenerji is planning to invest in a battery storage capacity of 10-20 MW. Capital Expenditure (CAPEX) Battery Storage Systems: Battery costs are highly dependent on capacity, chemistry, and technology. A typical benchmark for battery storage systems is 300-500 per kWh of storage capacity. oEstimated battery capacity for energy storage (assuming Akenerji plans to store around 200 MWh of energy):20,000 kWh300 USD/kWh6 million USD oUpper bound estimate:20,000 kWh500 USD/kWh10 million USD oTotal CAPEX range for battery storage systems:6 million -10 million USD Operational Expenditure (OPEX) Maintenance and Operation: Battery systems have relatively low OPEX, mainly for maintenance, software management, and cooling systems. oEstimated OPEX: 10-15 per kW of storage capacity per year oAnnual OPEX for battery storage(200 MWh):*

20,000 kW10 USD/kW200.000 USD/year oUpper bound estimate: 20,000 kW15 USD/kW300.000 USD oTotal OPEX range for battery storage: 200.000-300.000 USD per year

### (3.1.1.29) Description of response

Energy storage systems (ESS) can have a significant positive impact on the profitability of Akenerji. By integrating storage systems with renewable energy sources, companies can optimize energy production, manage supply-demand fluctuations, and capture market opportunities more effectively. Energy storage systems will allow Akenerji to store energy during periods of low demand or high renewable generation (when energy prices are lower) and then sell it during peak demand periods when prices are higher. In the process defined as energy arbitrage, we aim to directly increase revenue by maximising sales at the most profitable times. In addition, energy storage can reduce wear and tear on conventional generators by stabilising power distribution, resulting in lower maintenance costs. With battery storage investments, one of the technology investments in our low-carbon roadmap, we aim to optimise our operations, reduce maintenance costs, increase energy efficiency and reduce the impact of energy price volatility.

## Climate change

### (3.1.1.1) Risk identifier

Select from:

Risk3

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

Market

Other market risk, please specify

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

Select from:

Direct operations

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

Select all that apply

Turkey

### (3.1.1.9) Organization-specific description of risk

Decline in market share, decrease in turnover and increase in costs due to tightening of legislation related to climate change is medium- high risk for Akenerji. Akenerji assesses the risk of decline in market share, decrease in turnover and increase in costs in the electricity market due to the tightening of legislation related to climate change in the high risk category. The further tightening of climate change policies in Turkey and internationally and the new obligations imposed by carbon regulations increase cost pressures on fossil fuel power generation facilities. The increase in carbon taxes and the financial liabilities incurred by plants with high carbon intensity may have a negative impact on Akenerji's competitive position. As the shift towards renewable energy accelerates due to climate change, new regulations imposed on power generation activities with high carbon emissions may adversely affect Akenerji's market share. There is a risk of decrease in turnover and increase in operational costs due to increasing costs and carbon pricing.

### (3.1.1.11) Primary financial effect of the risk

Select from:

- Decreased revenues due to reduced production capacity

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

Select all that apply

- Medium-term

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

Select from:

- Very 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 impact of this risk on Akenerji's financial performance is at a high level and it is estimated that the risk of loss of market share, decrease in turnover and increase in costs.*

### **(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)**

0

### **(3.1.1.25) Explanation of financial effect figure**

*Hybrid projects are seen as an effective tool to mitigate transition risks associated with regulatory changes, market shifts, technological developments, reputational pressures and operational challenges. As Akenerji, we aim to adapt to global decarbonisation trends, strengthen our competitive position and ensure operational and financial sustainability with a low-carbon roadmap by investing in hybrid solutions. In this context, we are currently working on the budget and feasibility studies for the investments we will make. Hydroelectric plants are typically aligned with environmental regulations that promote the use of renewable energy. By operating Kemah HES, Akenerji will be in compliance with both national and international environmental standards, helping the company meet its ESG (Environmental, Social, and Governance) objectives. Additionally, Kemah HES is a new investment project provides a reliable and stable energy source, enhancing energy security by diversifying Akenerji's energy portfolio. Hydroelectric power is a steady source of electricity, particularly in regions with consistent water flow, helping to reduce dependence on fossil fuels and mitigate risks associated with fuel price volatility.*

### **(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

0

### (3.1.1.28) Explanation of cost calculation

*In the calculations, annual revenue streams of the projects were calculated using annual energy generation capacity and market price projections. The revenue projections are detailed to show the payback periods of the investments, cash flows and the impact on the company's overall profitability. By using all the data included in the budget allocated for Kemah HEPP and hybrid power plant investments, this financial modelling has modelled how the projects will perform in terms of profitability, cash flow, payback period and resilience against risks in the long term. With CAPEX, OPEX, revenue projections and ROI calculations, it clearly shows how much financial return will be obtained from these projects and which costs will be encountered.*

### (3.1.1.29) Description of response

*Hydroelectric projects like Kemah HEPP help Akenerji reduce its overall carbon footprint, directly supporting the company's commitment to low-carbon transition. With increasing regulatory pressures and carbon pricing, renewable projects such as Kemah HES enable Akenerji to lower its exposure to transition risks associated with climate change policies and regulatory changes. Once the initial investment in infrastructure is made, hydroelectric power plants tend to have low operational and maintenance costs compared to fossil fuel-based plants. The Kemah HEPP, once operational, will provide a cost-effective source of energy for Akenerji over the long term, contributing to better financial stability and profitability.*

[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:

- OPEX

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

1

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

Select from:

- 11-20%

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

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

Select from:

1-10%

### (3.1.2.7) Explanation of financial figures

*Kemah Hydroelectric Power Plant project is one of Turkey's leading hydroelectric power plant projects with its high installed capacity of 198 MW, reservoir capacity and location. The State Hydraulic Works Final Project approval procedures of the project, which is planned to be established in Erzincan province and is expected to generate an average of 560 GWh of electricity per year, were completed in 2017, and the pre-construction period was extended by amending the licence in 2020. Economic analysis studies on conventional alternatives, benefiting from the Yekdem law and pumped storage alternatives regarding this Investment, which is among the most important projects of Akenerji Elektrik Üretim A.Ş., are ongoing as of 31 December 2023. The existing railway line passes through the Kemah HEPP lake area and a part of the line will be under water after the completion of the project. The relocation of this line is planned to be included in the investment plan of TCDD and Ministry of Transport in the upcoming period as a public investment to be made by the state. The Group plans to carry out other necessary works for the investment after the realisation of the relocation plan. The Kemah project, which is still in the licence phase, is not included in the balance sheet assets since the project has not started as of 31 December 2023 due to the continuation of the economic analysis and alternative evaluations mentioned above and the relocation plans.*

## Water

### (3.1.2.1) Financial metric

Select from:

CAPEX

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

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

Select from:

1-10%

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

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

Select from:

1-10%

### (3.1.2.6) Amount of CAPEX in the reporting year deployed towards risks related to this environmental issue

0

### (3.1.2.7) Explanation of financial figures

*Feke-2 SFC Capacity Increase Project Name: Feke-2 Vibration Protection System Revision Objective: To support the continuity of the plant's production and make its availability safer. Results and Benefits: The revision of the vibration protection system was successfully completed. With the integration of the newly installed system into the PLC software and SCADA system, daily operation management has become more efficient. Operational safety was increased and potential failure risks were minimised during plant operations. Project Name: Feke-2 SCADA System Revision Objective: To support the continuity of the plant's production and make its availability safer. Results and Benefits: The renewal of the SCADA system increased the stability of the communication infrastructure. Daily operation management became more efficient. More reliable operation of the SCADA system minimised production interruptions. Project Name Feke-2 Capacity Increase Objective To maximise profits from TEİAŞ ancillary service agreements in order to increase the company's commercial profitability and strengthen its competitiveness in challenging market conditions. Results and Benefits: The test was successfully completed and the reserve capacity was increased to 15 MW. The capacity increase of the plant enabled better adaptation to market conditions and increased revenue potential. Increased flexibility in generation and profitability in commercial operations.*

[Add row]

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

### Row 1

#### (3.2.1) Country/Area & River basin

##### Mexico

Other, please specify :turkey

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

Select all that apply

Direct operations

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

7

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

Select from:

1-25%

**(3.2.8) % organization’s annual electricity generation that could be affected by these facilities**

Select from:

1-25%

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

Select from:

1-10%

**(3.2.11) Please explain**

*The Water Risk Filter physical risk layer represents both natural and human-induced conditions of river basins. It comprises four risk categories covering different aspects of physical risks: water scarcity, flooding, water quality, and ecosystem services status. Therefore, physical risks account for if water is too little, too much, unfit for use, and/or the surrounding ecosystems are degraded, and in turn, negatively impacting water ecosystem services. While the physical water risk for Uluabat HEPP, Burç HEPP, Feke 1 HEPP, Feke 2 HEPP, Gökkaya HEPP, Bulam HEPP and Himmetli HEPP have moderate physical water risk. These seven hydroelectric power plants are likely to be exposed to moderate water stress and, when considered in terms of their generation capacity, correspond to less than 25% of our total operations.*

[Add row]

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

	Water-related regulatory violations	Comment
	Select from: <input checked="" type="checkbox"/> No	Akenerji has not been subject to any fines, enforcement orders, or other penalties for water-related regulatory violations in the reporting year.

[Fixed 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:



	<b>Environmental opportunities identified</b>
	<input checked="" type="checkbox"/> Yes, we have identified opportunities, and some/all are being realized
Water	Select from: <input checked="" type="checkbox"/> 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

**Resilience**

Increased resilience to impacts of climate change

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

Select from:

Direct operations

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

Select all that apply

Turkey

### (3.6.1.8) Organization specific description

*In order to implement evacuation plans quickly and safely in case of possible disasters at Akenerji and to prevent possible loss of life and property, we carry out our disaster preparedness and response activities within the framework of ISO 45001:2018 Occupational Health and Safety Management Systems and monitor our performance through emergency drills, risk assessments, internal and external audits, emergency management plan, field reports, personnel warning, accident near-miss forms, instructions, procedures and related control forms. 'Emergency Plans' prepared for Akenerji Head Office and power plants address the risks of fire, flare and explosion, earthquake, hazardous chemical substance release, occupational accident, flood and inundation, landslide-landslide, food poisoning, attack-sabotage, epidemic diseases, storm. Emergency Teams designated within the plans are specialised to respond to any eventuality. Existing facilities are ready for unexpected events*



and regular renovations are carried out in accordance with the conditions. When problems are encountered, quick solutions are implemented with the latest technology and quality materials. The preference of quality equipment increases the durability of the facilities. In areas with flood and landslide risk, Akenerji carries out specific studies within the scope of life safety and disaster management. Our company complies with national and international occupational health and safety requirements at the highest level.

### **(3.6.1.9) Primary financial effect of the opportunity**

Select from:

- Reduced indirect (operating) 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

- Short-term
- The opportunity has already had a substantive effect on our organization in the reporting year

### **(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

### **(3.6.1.13) Effect of the opportunity on the financial position, financial performance and cash flows of the organization in the reporting period**

As a result of the strengthening of our power plant infrastructure and the good management of the process by our company, the ratio of mandatory shutdowns other than planned maintenance (Number of mandatory shutdown days/(365 days - Number of planned maintenance days)) was realised as 1.18. The mandatory stoppage rate, which is among our company targets, was realised well below the 2023 target of 1.75, reducing our operational costs and ensuring more efficient production and revenue increase by reducing interruptions in production.

### **(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**

As in 2023, the mandatory stoppage rate was among our Company targets for 2024. With the measures we have taken and our current best practices, we aim to further improve system efficiency and further reduce our mandatory shutdowns every year and increase our operational efficiency and financial performance.

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

Select from:

- No

### **(3.6.1.24) Cost to realize opportunity**

### (3.6.1.25) Explanation of cost calculation

*As a result of all the improvements we have made, in line with our goal of taking optimum cost management and revenue generating actions, our company's 2023 revenue target of 12% has been realised as 15%. In addition, with the accurate production planning, our maintenance and downtime rate was realised as 1.18%, although it was targeted as 1.75%. In the light of all these data, within the scope of the opportunity created by our Company with the aforementioned practices.*

### (3.6.1.26) Strategy to realize opportunity

*Akenerji reduced the mandatory downtime rate to 1.18 - Increased revenues by providing higher electricity generation. - Reduced operating costs by reducing unplanned maintenance costs. - Increased profit margin by reducing the cost per MWh of energy produced. - Increased return on infrastructure investments by optimising plant performance and providing a more stable revenue stream.*

## Water

### (3.6.1.1) Opportunity identifier

Select from:

Opp1

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

#### Energy source

Use of renewable energy sources

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

Select from:

Direct operations

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

Select all that apply

Turkey

### (3.6.1.6) River basin where the opportunity occurs

Select all that apply

Other, please specify :Firat

### (3.6.1.8) Organization specific description

*Water resources have a strategic importance for Turkey's renewable energy potential. Turkey is one of the countries with large hydroelectric potential thanks to its geographical location and topographical structure. Hydroelectric power generation plays an important role in reducing carbon emissions while increasing Turkey's energy supply security as both a renewable and clean energy source. The utilisation of water resources for energy generation, further strengthened by increasing technical capacity and political support, makes a significant contribution to the country's sustainable energy targets. Akenerji's water-related opportunity areas offer strategic and environmental advantages, especially considering hydroelectric power plants and energy generation based*

on water management. Operations based on water resources offer significant opportunities to increase energy generation capacity, reduce costs, achieve sustainability targets and create new business opportunities. Increasing the Efficiency of Existing HEPPs: Akenerji's hydroelectric power plants offer a renewable energy source by utilising the power of water in power generation. Modernisation of existing power plants and increasing their efficiency is an important opportunity to ensure production continuity. Operational costs are reduced by increasing energy generation capacity through technology investments. Akenerji manages water resources efficiently by using hydrological data modelling and climate forecasts.

### **(3.6.1.9) Primary financial effect of the opportunity**

Select from:

- Increased revenues resulting from increased production capacity

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

Select all that apply

- Short-term
- The opportunity has already had a substantive effect on our organization in the reporting year

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

Select from:

- Very likely (90–100%)

### **(3.6.1.12) Magnitude**

Select from:

- Medium-high

### **(3.6.1.13) Effect of the opportunity on the financial position, financial performance and cash flows of the organization in the reporting period**

Climate change and water scarcity pose significant risks for hydroelectric power plants that depend on continuous water flow. By implementing efficient water management practices and using hydrological data modelling to predict water availability, Akenerji can reduce the risk of water scarcity that could disrupt power generation. Water use planning and adaptation strategies enable the Akenerji to keep its production at optimum levels during periods of water scarcity, reducing the risk of interruptions and financial losses.

### **(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**

Akenerji generates approximately 20% of its energy from HEPPs. Water resources have a strategic importance for Turkey's renewable energy potential. Turkey is one of the countries with large hydroelectric potential thanks to its geographical location and topographical structure. Hydroelectric power generation, as both a renewable and clean energy source, increases Turkey's energy supply security and plays an important role in reducing carbon emissions.

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

Select from:

No

### (3.6.1.24) Cost to realize opportunity

0

### (3.6.1.25) Explanation of cost calculation

*Increasing power generation capacity through modernisation also leads to higher revenues. Effective water management through hydrological data modelling and climate forecasts allows Akenerji to anticipate water availability, reduce the risk of production interruptions and optimise water resource use. Modernisation of hydroelectric power plants involves upgrading equipment and systems, resulting in higher energy output and lower operating costs. The calculation for cost savings is based on increased energy production resulting from improved efficiency.*

### (3.6.1.26) Strategy to realize opportunity

*Within the scope of the climate transition plan, Akenerji plans to expand its renewable energy portfolio and increase the efficiency of existing hydroelectric power plants in order to better utilise water-related opportunity areas. In particular, modernisation projects and smart water management systems will be commissioned to optimise energy generation based on water resources, thus further reducing carbon emissions while increasing energy generation capacity.*

## Climate change

### (3.6.1.1) Opportunity identifier

Select from:

Opp2

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

#### Products and services

Ability to diversify business activities

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

Select from:

Direct operations

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

Select all that apply

Turkey

### (3.6.1.8) Organization specific description

*Akenerji plans significant investments within the scope of transition to low-carbon technologies. These investments will contribute to the achievement of the Company's sustainability targets and gain competitive advantage in the transition to a low carbon economy. In particular, Kemah HEPP (198 MW), wind and solar investments with storage and battery storage investments in existing facilities aim to reduce carbon intensity while increasing Akenerji's energy generation capacity. Kemah HEPP: As a clean and renewable energy source, this hydroelectric power plant will significantly reduce Akenerji's carbon emissions and contribute to sustainable*

energy generation. The project will add 198 MW to the Company's power generation capacity and provide long-term revenue growth. *Wind and Solar Investments with Storage:* These investments will be combined with energy storage systems to manage the variability in renewable energy generation and increase the security of energy supply. In this way, Akenerji will be more flexible against fluctuations in market prices and increase its revenues by optimising energy supply during periods of high demand. *Battery Storage in Existing Facilities:* Battery storage investments in existing facilities will increase energy storage capacity and ensure efficiency and flexibility in energy generation. These investments will contribute to faster adaptation of power generation to instant demand changes and reduce operational costs by reducing outage risks.

### **(3.6.1.9) Primary financial effect of the opportunity**

Select from:

- Increased revenues resulting from increased demand for products and services

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

Select all that apply

- Medium-term
- The opportunity has already had a substantive effect on our organization in the reporting year

### **(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:

- High

### **(3.6.1.13) Effect of the opportunity on the financial position, financial performance and cash flows of the organization in the reporting period**

*As a company that focuses on power plant investments based on renewable resources in order to create resource diversity and cost advantage, we have increased the number of alternative energy-sourced power plants over the years by carrying out many projects at the same time. As Akenerji, after the high success we achieved in import/export activities in 2023, we established the Netherlands-based Aken Europe BV. company in July 2023 to provide direct access to European spot markets. As Akenerji, we generated 4,202,448.9 MWh of gross electricity in 2023 with our balanced, sustainable, efficient and environmentally friendly portfolio. We continued to maintain our competitive position in 2023 with our 1,224 MW installed capacity, which we reached as a result of the investments we made with the responsibility of the importance of renewable energy resources against climate change and taking into account Turkey's long-term energy policy, and our flexible portfolio structure that quickly adapts to market conditions. As a company that focuses on power plant investments based on renewable resources in order to create resource diversity and cost advantage, we have increased the number of alternative energy-based power plants over the years by carrying out several projects at the same time. As Akenerji, we ensured that renewable energy resources are brought to the national economy in a reliable, economical and high quality manner with 1 wind and 7 hydroelectric power plants that we gradually commissioned between 2009 and 2012. Following the work we have carried out in Erzin CCGT in the last three years, we have greatly improved the plant's capabilities such as load taking, load shedding and operating at low capacity. The plant, which we continued to improve in this context in 2023, maintained its competitive position by responding to the flexibility needs, which are very important for the balance and security of the Turkish electricity grid, in the strongest way. As Akenerji, with the advantage of our balanced generation portfolio, we compensated the generation deficit that*

occurred at Erzin CCGT during periods when market prices were at relatively low levels due to low national demand and high hydrology, especially in the second quarter of the year, with generation from renewable power plants.

### **(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**

Increasing variable costs were responded with experience, operational excellence, digitalisation and high efficiency. We continuously renew the maintenance and asset management strategies of the entire portfolio to achieve higher availability, improve our operational performance and reduce our production costs. Kemah HEPP investment project will have a highly positive impact on Akenerji's financial performance. Both the increase in renewable energy generation capacity and the integration of energy storage systems will contribute to the increase in the Company's revenues and cost optimisation in the long term. Energy storage systems allow Akenerji to store excess energy produced by renewable sources (e.g., solar or wind) that would otherwise be curtailed due to grid constraints or low demand. This ensures that all the energy generated by the company's assets is utilized, which increases overall efficiency and revenue.

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

Select from:

No

### **(3.6.1.24) Cost to realize opportunity**

0

### **(3.6.1.25) Explanation of cost calculation**

Akenerji's Kemah HEPP, battery and storage investments planned for existing facilities are strategically designed to diversify the energy portfolio and enhance our Company's ability to operate in a low carbon economy. The planned investments will enable significant positive financial impacts by reducing carbon intensity, increasing electricity generation capacity, improving operational efficiency. 1. Portfolio Diversification through Increased Renewable Energy: Kemah HEPP (198 MW) adds significant renewable energy capacity to Akenerji's portfolio, increasing the share of clean energy and reducing the Company's carbon intensity. Kemah HEPP, a hydroelectric power plant, is a long-term asset with minimal operating costs and sustainable revenue generation potential. By increasing the share of renewable energy in its energy mix, Akenerji will benefit from carbon pricing mechanisms and regulatory incentives, contributing to lower compliance costs and increasing revenues from potential carbon credits and green energy certificates. 2. Energy Supply Optimisation through and Battery Storage Investments: Investments in renewable energy, together with energy storage, will reduce the variability of renewable energy generation, ensure continuous supply and reduce the risks associated with fluctuations in market prices. Battery storage investments in existing facilities will increase Akenerji's ability to store energy during low demand periods and sell it during peak demand periods when prices are higher, and will increase profit margins by balancing revenue streams and optimise market pricing opportunities. 3. Increased Flexibility and Reduced Operational Costs: The use of battery technology will provide flexibility in adapting to instantaneous demand changes and reduce the frequency of outages. By increasing operational efficiency and reducing downtime, these investments will lead to lower operational costs and increase the overall profitability of Akenerji's power generation facilities.

### **(3.6.1.26) Strategy to realize opportunity**

Several strategic decisions have been taken to fully capitalise on the opportunities of Akenerji's investments in low-carbon technologies and to ensure their success. Cost-Effective Budgeting: Careful budgeting and resource allocation ensure that investments are efficiently directed to projects with the highest return potential, such as Kemah HEPP and storage-enhanced wind and solar power projects. Compliance with Regulatory Frameworks: Akenerji works closely with regulatory bodies to comply with evolving energy regulations and to take full advantage of incentives or subsidies available for renewable energy projects. Improvement of Operational



Capacity: Akenerji will continue to strengthen its operational capacity to effectively manage the capacity and new service areas to be added to its portfolio.

## Climate change

### (3.6.1.1) Opportunity identifier

Select from:

- Opp3

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

Products and services

- Development of new products or services through R&D and innovation

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

Select from:

- Direct operations

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

Select all that apply

- Turkey

### (3.6.1.8) Organization specific description

*A proactive approach is taken by evaluating the impact of future climate-related impacts on operations with the software used and developed and digital transformation projects. Through all systems, the company has created an opportunity area by managing the impacts of extreme weather events and minimising the risks arising from legislation. ETRM: (Energy Trade Risk Management) We currently use a software developed by ourselves at Akenerji. The software is a system that calculates and reports the profit/loss, open positions and risks of commercial transactions (electricity, gas, carbon) made in the energy markets live. Erzin Dispatch: In the current medium-term planning, the planning that calculates the electricity generation, gas consumption and carbon consumption (there is currently no carbon market, but it can calculate the amount of carbon that needs to be purchased in case the carbon market arrives) that the erzin power plant will make using price forecasts (electricity gas carbon). Generator: A software project that will integrate market analyses, ETRM, Price Forecasting and Dispatch models with EPIAŞ systems to automatically send bids to the markets in line with the needs and analyses. Meteorological Data: It is outsourced and used to feed the forecasts of the factors that will affect the price forecasts in the markets (especially demand & hydrology, Wind and Solar productions). In addition, we receive daily production forecasts for our own Wind power plants.*

### (3.6.1.9) Primary financial effect of the opportunity

Select from:

- Reduced indirect (operating) 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

- Short-term

The opportunity has already had a substantive effect on our organization in the reporting year

### **(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

### **(3.6.1.13) Effect of the opportunity on the financial position, financial performance and cash flows of the organization in the reporting period**

*Akenerji utilises advanced digital systems and specially developed software such as ETRM (Energy Trade Risk Management), Erzin Dispatch, Price Forecast and Generator to effectively manage the operational impacts of climate change. These tools enable real-time calculation and reporting of profits, open positions and risks in energy markets covering electricity, gas and carbon trade. Using these systems, Akenerji performs comprehensive price forecasts that integrate market factors, including fuel (gas, coal, oil) and carbon costs, to predict future electricity prices. In addition, by outsourcing meteorological data, the effects of wind, solar and hydrological conditions on power generation are estimated and operational planning is supported. By integrating these digital platforms, Akenerji is able to model and forecast climate-related impacts on its operations and is well positioned to capture opportunities presented by market changes and emerging carbon pricing mechanisms. The software and systems used constitute an important opportunity for Akenerji, increasing its operational resilience and competitiveness in the low carbon economy.*

### **(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**

*Akenerji's digital infrastructure provides a strategic advantage to manage climate change impacts and capitalise on new opportunities. These systems will support the company's future operational decisions and play an important role in achieving its long-term sustainability goals. The digital systems used by Akenerji offer significant opportunities for future investments and operations. These systems strengthen decision support mechanisms by integrating changes in energy markets, climatic factors and innovative carbon pricing mechanisms. The systems used can provide critical inputs for new investment decisions by making real-time market analyses and price forecasts. In the event of a carbon market, the capacity to calculate carbon consumption amounts may support Akenerji's orientation towards low-carbon technologies, which may increase financial profitability opportunities. Digital modelling and forecasting systems are critical in facilitating the integration of climate change-related operational risks into financial analyses. In this way, it is aimed to carry out feasibility studies of investments more accurately and comprehensively, and to see the impact of climate impacts on long-term operational costs more clearly. With the systems used, it will be possible to better predict future investment opportunities such as renewable energy investments and energy storage solutions by making more accurate forecasts regarding the energy supply-demand balance.*

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

Select from:

No

### **(3.6.1.24) Cost to realize opportunity**

0



### **(3.6.1.25) Explanation of cost calculation**

Akenerji's software systems such as ETRM (Energy Trade Risk Management), Erzin Dispatch, Price Forecast and Generator directly affect financial results by optimising energy production, managing market risks and improving decision-making processes in both energy and carbon markets. These systems provide the following financial benefits: *Optimised Energy Generation and Distribution: Erzin Dispatch and Price Forecasting tools allow Akenerji to forecast energy prices and generation costs, optimising electricity generation schedules according to price trends and fuel costs. These systems minimise operational costs while maximising revenue by aligning production to the most profitable times. Risk Mitigation in Energy and Carbon Markets: ETRM helps manage exposure to price volatility in the energy and carbon markets. Real-time data on electricity, gas and carbon prices help protect Akenerji against market fluctuations and reduce the financial risk of unfavourable price changes. This results in more stable cash flows and lower risk premiums in financial forecasts. Scenario Analysis for Long Term Planning: Akenerji uses Price Forecasting and meteorological data modelling to assess future market conditions by integrating variables such as carbon pricing, fuel price volatility and climate-related risks. These tools support investment decisions, helping to allocate capital more efficiently and ensuring high return on investment (ROI) for renewable energy and energy storage projects. Cost Savings Reduced Fuel Usage (kWh)/ Fuel Cost (kWh) By optimizing energy dispatch, fuel consumption is reduced, directly decreasing operational costs.*

### **(3.6.1.26) Strategy to realize opportunity**

*With our optimisation strategy, we manage our operations in line with daily production forecasts and dynamic production planning. In the following period, the studies carried out will be diversified and strengthened with the current and future technological developments.*

[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:

CAPEX

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

0

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

Select from:

11-20%

#### **(3.6.2.4) Explanation of financial figures**

*Akenerji integrates operational (OPEX) and capital expenditure (CAPEX) planning into its climate change strategies in line with the target of 50% emission reduction by 2030 based on the year 2017. The investments to be made include both projects that will provide carbon reduction and projects that will increase operational efficiency. Akenerji's CAPEX planning largely focuses on renewable energy projects and investments in low-carbon technologies. The Company aims to significantly reduce carbon emissions by increasing investments in*

carbon-free energy sources such as hydroelectricity, wind and solar energy. For example, Kemah HEPP is one of the key projects of this strategy and will directly contribute to the reduction of carbon emissions by reducing the use of fossil fuels in Akenerji's energy production. In addition, Akenerji plans to invest in energy storage systems along with wind and solar energy investments. While these investments ensure the continuity of renewable energy generation, energy storage technologies make it possible to respond to demand fluctuations with flexibility. Akenerji aims to optimise renewable energy generation processes and minimise carbon emissions through battery storage investments. CAPEX planning allocates significant resources not only for new energy projects, but also for the modernisation and efficiency improvement of existing power plants. Renewal of old technologies and transition to more efficient energy generation technologies will both reduce carbon emissions and lower energy costs. These plans play a critical role in achieving Akenerji's sustainable growth targets until 2030.

## Water

### (3.6.2.1) Financial metric

Select from:

CAPEX

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

0

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

Select from:

1-10%

### (3.6.2.4) Explanation of financial figures

Akenerji's OPEX planning is focused on increasing operational efficiency in water management processes and reducing water consumption. In order to ensure efficient use of water in energy generation processes, investments are continuously made in periodic maintenance and monitoring systems. Processes related to the use of water in hydroelectric power plants are optimised through regular maintenance and monitoring activities, resulting in lower operational costs in the long term. Akenerji also better guides its operational decisions by monitoring hydrological data and integrating climate forecasts into water management processes. Efficient use of water resources both reduces the risk of excessive water use and ensures the sustainable use of water resources in energy generation.

## Climate change

### (3.6.2.1) Financial metric

Select from:

OPEX

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

0

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

Select from:

1-10%

#### **(3.6.2.4) Explanation of financial figures**

*Akenerji's OPEX planning focuses on making energy generation processes more efficient and harmonising them with the operational phases of the transition to low carbon technologies. Measures taken to achieve energy efficiency lower operating costs and reduce carbon emissions. For example, with energy efficiency projects implemented in power plants, it becomes possible to generate more energy using fewer resources in power generation. This not only reduces carbon emissions but also reduces operating costs. In addition, Akenerji's investments in digitalisation and automation applications in energy generation processes also play an important role in OPEX planning. The use of digital technologies enables more efficient management of energy generation processes, minimising production interruptions and reducing energy losses. Digital solutions, especially those integrated with energy storage systems, increase the flexibility of production processes and optimise energy production costs. In addition to achieving carbon reduction targets, these investments also increase Akenerji's operational profitability. Akenerji also plans to generate additional revenues from low-carbon energy generation by using mechanisms such as renewable energy certificates (IREC) and carbon credits, and to use these revenues to offset operating expenses. These processes contribute to the management of Akenerji's operational budget in line with sustainable growth targets.*

*[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

*Akenerji's Board of Directors is strongly committed to advancing diversity and inclusion as a core element of our governance structure. Our diversity and inclusion policy emphasizes selecting board members based on merit, ensuring that decisions are free from discrimination related to age, race, ethnicity, geographical background, or gender. Presently, 25% of our Board members are women, underscoring our dedication to gender diversity. We aim to maintain and increase this percentage, recognizing the critical role diverse perspectives play in fostering innovation, effective decision-making, and long-term business resilience. Akenerji's Sustainability Prioritization Matrix identifies equal opportunity and diversity as key priorities. Our policy promotes an inclusive environment where every voice contributes to our success. The Board regularly evaluates its composition to align with diversity goals. Our human resources practices support employees in becoming versatile, innovative team members, making Akenerji a preferred and exemplary institution in the sector. Energy for us means adding value to these lands, being reliable with a pioneering stance, benefiting society, and constantly evolving with new ideas. We embrace diversity, feed on versatility, and blend expertise with an agile culture, youth energy, and dynamism, opening doors to a good future. In our employer value proposition, all employees embrace the motto "Make a difference with your energy".*

#### (4.1.6) Attach the policy (optional)

C.Icerik-G\_IK 001 - İnsan Kaynakları Politikası.pdf  
[Fixed row]

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

	<b>Board-level oversight of this environmental issue</b>
Climate change	Select from: <input checked="" type="checkbox"/> Yes
Water	Select from: <input checked="" type="checkbox"/> Yes
Biodiversity	Select from: <input checked="" type="checkbox"/> 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

- Chief Executive Officer (CEO)
- Board-level committee

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

Select from:

- Yes

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

Select all that apply

- Board Terms of Reference
- Board mandate
- Individual role descriptions

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

Select from:

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

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

Select all that apply

- ☑ Reviewing and guiding annual budgets policy engagement
- ☑ Overseeing and guiding scenario analysis policy engagement
- ☑ Overseeing the setting of corporate targets innovation/R&D priorities
- ☑ Monitoring progress towards corporate targets employee incentives
- ☑ Approving corporate policies and/or commitments capital expenditures
- ☑ Monitoring the implementation of the business strategy
- ☑ Overseeing reporting, audit, and verification processes
- ☑ Monitoring the implementation of a climate transition plan
- ☑ Overseeing and guiding the development of a business strategy
- ☑ Overseeing and guiding acquisitions, mergers, and divestitures
- ☑ Monitoring supplier compliance with organizational requirements
- ☑ Monitoring compliance with corporate policies and/or commitments
- ☑ Overseeing and guiding the development of a climate transition plan
- ☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities
- ☑ Overseeing and guiding public
- ☑ Overseeing and guiding public
- ☑ Reviewing and guiding
- ☑ Approving and/or overseeing
- ☑ Overseeing and guiding major

#### **(4.1.2.7) Please explain**

*The Board of Directors(BoD) is the highest authority authorised to make decisions on sustainability-based activities. The BoD has a high level of competence and responsibility for managing environmental issues and climate change risks and opportunities. The BoD plays a critical role in achieving Akenerji's goals of transition to a low-carbon future. In their past experience, one of the members of the BoD has worked at the executive level in national authorities where legislation and legal requirements are established on climate change and environmental issues. The BoD convened 5 times during the year. One of the main topics on the agenda of the BoD is sustainability. In this context, the issues addressed in 2023 were realised as follows. External audits, CDP- Rating results Integrated Reporting Process The legal processes of the power plants (renewed capacity reports, licenced ) The risks and opportunities table is reviewed by departments every 2 months. High-grade risk issues above level 15, which are included in the 5\*5 matrix, are discussed at the BoD. The BoD monitors and manages the strategic importance of environmental issues and the management of climate change risks at a high level. With the established bidirectional governance structure, there is a dynamic structure that ensures bidirectional information flow from top to bottom and bottom to top. While the BoD has responsibility at the executive level, climate-related processes are effectively managed through the Sustainability Committee(SC), which consists of decision-making managers. The SC is chaired by the Assistant General Manager of Production and reports to the General Manager. The Committee monitors sustainability trends and climate-related issues, which are among the goals of our Company, throughout the year and makes them a part of sustainability management by including performance indicators in monitoring systems. The SC also aims to develop sustainability strategy and implementation tools by evaluating risks and opportunities, and to ensure the active participation of employees in sustainability efforts through the training they receive. The SC convened four times in 2023 to review climate-related risks and opportunities and current performance, plan actions, and work to set short-term targets. In line with the decision taken at the SC meeting held in February 2023, we initiated our TCFD and TNFD-based studies to analyse the impacts of climate change and integrate them into our strategic plans. We determined our strategic goals for 2024 and beyond through intensive workshops held in the first half of 2023. During the workshops, we evaluated the threats and opportunities in the sector and analysed the strengths and weaknesses of our company. After determining the main and sub-goals of our company, the actions we need to take in the short, medium and long term and the projects to be carried out to achieve these goals, the activities carried out were presented to the BoD.*

## **Water**

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

Select all that apply

- Chief Executive Officer (CEO)
- Board-level committee

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

Select from:

- Yes

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

Select all that apply

- Board Terms of Reference
- Board mandate
- Individual role descriptions

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

Select from:

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

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

Select all that apply

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Reviewing and guiding annual budgets   | <input checked="" type="checkbox"/> Overseeing and guiding public policy engagement   |
| <input checked="" type="checkbox"/> Overseeing and guiding scenario analysis   | <input checked="" type="checkbox"/> Overseeing and guiding public policy engagement   |
| <input checked="" type="checkbox"/> Overseeing the setting of corporate targets  | <input checked="" type="checkbox"/> Reviewing and guiding innovation/R&D priorities   |
| <input checked="" type="checkbox"/> Monitoring progress towards corporate targets  | <input checked="" type="checkbox"/> Approving and/or overseeing employee incentives   |
| <input checked="" type="checkbox"/> Approving corporate policies and/or commitments  | <input checked="" type="checkbox"/> Overseeing and guiding major capital expenditures |
| <input checked="" type="checkbox"/> Monitoring the implementation of the business strategy   |   |
| <input checked="" type="checkbox"/> Overseeing reporting, audit, and verification processes  |   |
| <input checked="" type="checkbox"/> Monitoring the implementation of a climate transition plan                                       |   |
| <input checked="" type="checkbox"/> Overseeing and guiding the development of a business strategy                                    |   |
| <input checked="" type="checkbox"/> Overseeing and guiding acquisitions, mergers, and divestitures                                   |   |
| <input checked="" type="checkbox"/> Monitoring supplier compliance with organizational requirements                                  |   |
| <input checked="" type="checkbox"/> Monitoring compliance with corporate policies and/or commitments                                 |   |
| <input checked="" type="checkbox"/> Overseeing and guiding the development of a climate transition plan                              |   |
| <input checked="" type="checkbox"/> Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities |   |



#### **(4.1.2.7) Please explain**

*The Board of Directors(BoD) is the highest authority authorised to make decisions on sustainability-based activities. Climate change, water and biodiversity issues are managed with a holistic approach. There is no separate governance structure for water-related issues. The BoD has a high level of competence and responsibility for the management of environmental issues and water-related risks and opportunities. The BoD provides effective leadership in issues such as monitoring and improving environmental performance, risk management and integration of strategic decision-making processes with environmental factors. The BoD plays a critical role in Akenerji's efficient use of water, ensuring quality and continuous access to water, and achieving the Company's targets in this regard. The BoD monitors and manages the strategic importance of environmental issues and the management of water-related risks at a high level. With the established bidirectional governance structure, there is a dynamic structure that ensures bidirectional information flow from top to bottom and bottom to top. While the BoD has responsibility at the executive level, climate-related processes are effectively managed through the Sustainability Committee(SC), which consists of decision-making managers. The SC is chaired by the Assistant General Manager of Operations and reports to the General Manager. The SC monitors sustainability trends and water-related issues, which are among the goals of our Company, throughout the year and makes them a part of sustainability management by including performance indicators in monitoring systems. The SC convened four times in 2023 to review climate-related risks and opportunities and current performance, plan actions and work on setting short-term targets. In line with the plans of our SC and the work carried out with the support of the BoD, our water use was reduced by approximately 36% in 2023 compared to 2022. Our targets will be made more ambitious with the efficient use of water and the implementation of innovative technologies and good practices.*

### **Biodiversity**

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

*Select all that apply*

- Chief Executive Officer (CEO)

#### **(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
- Board mandate
- Individual role descriptions

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

*Select from:*

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

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

*Select all that apply*

- ☑ Reviewing and guiding annual budgets policy engagement
- ☑ Overseeing and guiding scenario analysis policy engagement
- ☑ Overseeing the setting of corporate targets innovation/R&D priorities
- ☑ Monitoring progress towards corporate targets employee incentives
- ☑ Approving corporate policies and/or commitments capital expenditures
- ☑ Monitoring the implementation of the business strategy
- ☑ Overseeing reporting, audit, and verification processes
- ☑ Monitoring the implementation of a climate transition plan
- ☑ Overseeing and guiding the development of a business strategy
- ☑ Overseeing and guiding acquisitions, mergers, and divestitures
- ☑ Monitoring supplier compliance with organizational requirements
- ☑ Monitoring compliance with corporate policies and/or commitments
- ☑ Overseeing and guiding the development of a climate transition plan
- ☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities
- ☑ Overseeing and guiding public
- ☑ Overseeing and guiding public
- ☑ Reviewing and guiding
- ☑ Approving and/or overseeing
- ☑ Overseeing and guiding major

#### **(4.1.2.7) Please explain**

*The Board of Directors(BoD) is the highest authority authorised to make decisions on sustainability-based activities. Climate change, water and biodiversity issues are managed with a holistic approach. There is no separate governance structure for biodiversity issues. The BoD has a high level of competence and responsibility for the management of biodiversity and ecosystem services. The BoD provides effective leadership in issues such as monitoring and improving environmental performance, risk management and integration of strategic decision-making processes with environmental factors. The BoD plays a critical role in the management of risks and opportunities arising from dependency and impacts, while assessing Akenerji's position within the scope of its impact and dependency on ecosystem services. One of the main topics on our Board agenda is sustainability. In this context, the issues addressed in 2023 were realised as follows. External audits CDP -Climate Change Reporting results Integrated Reporting Process The latest situation in the legal processes of the power plants (renewed capacity reports and licences ) ESIA processes related to capacity increases and solar projects Fortune & CRIF Turkey Sustainability Research, UN Global Compact New Reporting System outputs and Akenerji's position The risks and opportunities table is reviewed by departments every 2 months. High-grade risk issues above level 15, which are included in the 5\*5 matrix, are discussed at the BoD. The BoD monitors and manages the strategic importance of biodiversity, which is among the material issues of our company, and the management of water-related risks at a high level. With the established bidirectional governance structure, there is a dynamic structure that ensures bidirectional information flow from top to bottom and bottom to top. While the BoD has responsibility at the executive level, climate-related processes are effectively managed through the Sustainability Committee(SC), which consists of decision-making managers. The SC is chaired by the Assistant General Manager of Operations and reports to the General Manager. The SC monitors sustainability trends and water-related issues, which are among the goals of our Company, throughout the year and makes them a part of sustainability management by including performance indicators in monitoring systems. The Sustainability Committee convened four times in 2023 and reviewed the risk and opportunity areas and current performance within the scope of biodiversity, planned actions and carried out studies to determine short-term targets. In line with the plans of our Committee and the studies carried out with the support of the Board of Directors, the impacts and dependencies on biodiversity and ecosystem at each facility level were analysed. It was planned to create an action plan for the geographical distribution of ou*

[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

#### Academic

- Undergraduate education (e.g., BSc/BA in environment and sustainability, climate science, environmental science, water resources management, environmental engineering, forestry, etc.), please specify :BSc in Economics and Power Engineering
- Postgraduate education (e.g., MSc/MA/PhD in environment and sustainability, climate science, environmental science, water resources management, forestry, etc.), please specify :Master of Engineering, diploma with distinction, Electrical faculty- Economy and Management of Energy Sector

#### Experience

- Executive-level experience in a role focused on environmental issues
- Management-level experience in a role focused on environmental issues
- Experience in the environmental department of a government (national or local)
- Experience in an organization that is exposed to environmental-scrutiny and is going through a sustainability transition
- Active member of an environmental committee or organization

#### Other

- Other, please specify :Extensive advisory roles to government bodies and international organizations in environmental and climate change programs

## 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

#### Academic

- Undergraduate education (e.g., BSc/BA in environment and sustainability, climate science, environmental science, water resources management, environmental engineering, forestry, etc.), please specify
- Postgraduate education (e.g., MSc/MA/PhD in environment and sustainability, climate science, environmental science, water resources management, forestry, etc.), please specify

#### Experience

- Active member of an environmental committee or organization
- Experience in an academic role focused on environmental issues
- Executive-level experience in a role focused on environmental issues
- Management-level experience in a role focused on environmental issues
- Experience in the environmental department of a government (national or local)
- Experience in an organization that is exposed to environmental-scrutiny and is going through a sustainability transition

#### Other

- Other, please specify :Extensive advisory roles to government bodies and international organizations in river basin management.

[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: <input checked="" type="checkbox"/> Yes
Water	Select from: <input checked="" type="checkbox"/> Yes
Biodiversity	Select from: <input checked="" type="checkbox"/> 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 Operating Officer (COO)

### (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
- Managing supplier compliance with environmental requirements
- Managing value chain engagement related to environmental issues

#### Policies, commitments, and targets

- Monitoring compliance with corporate environmental policies and/or commitments
- Measuring progress towards environmental corporate targets
- Measuring progress towards environmental science-based targets
- Setting corporate environmental policies and/or commitments
- Setting corporate environmental targets

#### Strategy and financial planning

- Developing a climate transition plan  
operational expenditures relating to environmental issues
- Managing annual budgets related to environmental issues
- Implementing the business strategy related to environmental issues
- Developing a business strategy which considers environmental issues
- Managing acquisitions, mergers, and divestitures related to environmental issues
- Managing major capital and/or

### (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:

- More frequently than quarterly

### (4.3.1.6) Please explain

*The Board of Directors(BoD) is the highest authority authorised to make decisions on sustainability-based activities. The BoD has a high level of competence and responsibility for managing environmental issues and*

climate change risks and opportunities. The BoD plays a critical role in achieving Akenerji's goals of transition to a low-carbon future. In their past experience, one of the members of the BoD has worked at the executive level in national authorities where legislation and legal requirements are established on climate change and environmental issues. Our Board member provides leadership and guidance on climate change-related risks, opportunities and interactions in our industry and operations. The relevant member of the BoD has assumed managerial level duties related to the identification of climate change-related risks and increasing climate resilience in the Danube Basin, one of the largest basins in the world. In addition, he has been involved in many organisations on assessing the role and impact of the energy sector in carbon pricing policies. The BoD monitors and manages the strategic importance of environmental issues and the management of climate change risks at a high level. With the established bidirectional governance structure, there is a dynamic structure that ensures bidirectional information flow from top to bottom and bottom to top. While the BoD has responsibility at the executive level, climate-related processes are effectively managed through the Sustainability Committee(SC), which consists of decision-making managers.

## Water

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

#### Executive level

- Chief Operating Officer (COO)

### (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
- Managing supplier compliance with environmental requirements
- Managing value chain engagement related to environmental issues

#### Policies, commitments, and targets

- Monitoring compliance with corporate environmental policies and/or commitments
- Measuring progress towards environmental corporate targets
- Measuring progress towards environmental science-based targets
- Setting corporate environmental policies and/or commitments
- Setting corporate environmental targets

#### Strategy and financial planning

- Developing a climate transition plan  
operational expenditures relating to environmental issues
- Managing annual budgets related to environmental issues
- Implementing the business strategy related to environmental issues
- Developing a business strategy which considers environmental issues
- Managing acquisitions, mergers, and divestitures related to environmental issues
- Managing major capital and/or

### (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:

- More frequently than quarterly

#### (4.3.1.6) Please explain

*One of the members of the Board of Directors chairs the International Commission for the Protection of the Danube River (ICPDR) on water and basin management, protection, improvement and rational use of surface water and groundwater. One of his work experiences prior to his membership of the BoD of our company was as a Ministerial advisor in the Ministry of Environment of the Czech Republic. Within the scope of the relevant duty, he worked as an executive body in the establishment of legislation and legal requirements on environmental issues. Our Board member provides leadership and guidance on water-related risks, opportunities and interactions in our industry and operations. He has been involved at a managerial level in the management and resilience building of the Danube Basin, one of the largest basins in the world.*

### Biodiversity

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

##### Executive level

- Chief Operating Officer (COO)

#### (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
- Managing supplier compliance with environmental requirements
- Managing value chain engagement related to environmental issues

##### Policies, commitments, and targets

- Monitoring compliance with corporate environmental policies and/or commitments
- Measuring progress towards environmental corporate targets
- Measuring progress towards environmental science-based targets
- Setting corporate environmental policies and/or commitments
- Setting corporate environmental targets

##### Strategy and financial planning

- Developing a climate transition plan  
operational expenditures relating to environmental issues
- Managing annual budgets related to environmental issues
- Implementing the business strategy related to environmental issues
- Managing major capital and/or



- Developing a business strategy which considers environmental issues
- Managing acquisitions, mergers, and divestitures related to environmental issues

#### (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:

- More frequently than quarterly

#### (4.3.1.6) Please explain

*The BoD plays a critical role in the management of risks and opportunities arising from dependency and impacts, while assessing Akenerji's position within the scope of its impact and dependency on ecosystem services. One of our Board members, in his past experience, chairs the International Commission for the Protection of the Danube River (ICPDR) in the basin management of the Danube Basin, one of the largest basins in the world. One of his work experiences prior to his membership of the BoD of our company was as a Ministerial advisor in the Ministry of Environment of the Czech Republic. Within the scope of the relevant duty, he worked as an executive body in the establishment of legislation and legal requirements on environmental issues. Our Board member provides leadership and guidance on the risks and opportunities related to biodiversity and ecosystem services for our industry and operations, as well as the interactions in our operations. The BoD monitors and manages the strategic importance of biodiversity, which is among the material issues of our company, and the management of water-related risks at a high level. With the established bidirectional governance structure, there is a dynamic structure that ensures bidirectional information flow from top to bottom and bottom to top. While the BoD has responsibility at the executive level, climate-related processes are effectively managed through the Sustainability Committee(SC), which consists of decision-making managers.*

[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

12

#### (4.5.3) Please explain

*Akenerji offers monetary incentives to its senior management and relevant personnel to support the management of environmental issues and to fulfill the environmental commitments of the organisation. These incentives are created to reflect the responsibility and importance of the organisation in achieving its environmental goals.*

*Incentives serve as a tool to encourage the responsibility of the management team, as well as the contribution of all units to these goals, while ensuring that the organisation achieves its strategic environmental objectives. Bonuses for senior executives are calculated based on the bonus base, company performance and individual performance. There is no distinction between climate change and water in bonus and incentive mechanisms. In our company, all relevant issues are addressed within the scope of sustainability and strategic goals. The 12% share given on the side is the total share of climate change and water topics. No distinction has been made.*

## 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

12

### (4.5.3) Please explain

*Akenerji offers monetary incentives to its senior management and relevant personnel to support the management of environmental issues and to fulfill the environmental commitments of the organisation. These incentives are created to reflect the responsibility and importance of the organisation in achieving its environmental goals. Incentives serve as a tool to encourage the responsibility of the management team, as well as the contribution of all units to these goals, while ensuring that the organisation achieves its strategic environmental objectives. Bonuses for senior executives are calculated based on the bonus base, company performance and individual performance. There is no distinction between climate change and water in bonus and incentive mechanisms. In Akenerji, all relevant issues are addressed within the scope of sustainability and strategic goals. The 12% share given on the side is the total share of climate change and water topics. No distinction has been made.*  
[Fixed row]

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

## Climate change

### (4.5.1.1) Position entitled to monetary incentive

**Board or executive level**

Chief Financial Officer (CFO)

### (4.5.1.2) Incentives

Select all that apply

Bonus – set figure

Promotion

### (4.5.1.3) Performance metrics

## Targets

- Progress towards environmental targets
- Achievement of environmental targets

## 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

## Emission reduction

- Implementation of an emissions reduction initiative
- Increased share of renewable energy in total energy consumption

### (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 Remuneration Policy for Senior Executives Senior executive remuneration consists of two components: Fixed and performance-based. Senior executive fixed salaries are determined as per international standards and legal obligations, taking into account macroeconomic data in the market, wage policies valid in the market, the size and longterm goals of the Company, and the positions of individuals. The basis of senior executive bonuses is calculated according to Company and individual performance. Information about the criteria is summarised below: Bonus Base: Bonus bases are updated annually and vary depending on the business size of the managers' positions. While updating bonus bases, senior management bonus policies in the market are taken into consideration. Company Performance: Company performance is obtained by measuring the financial and operational (market share, exports, foreign activities, productivity, etc.) targets given to the Company at the beginning of each year and at the end of the period. When determining company goals, sustainability of success and improvements compared to previous years are the principles considered. Individual Performance: In determining individual performance, financial, customer, process, technology, and long-term strategy-related goals are taken into account, along with company goals. Long-term sustainable improvement is considered outside of financial areas when measuring individual performance in parallel with company performance.*

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

*Akenerji started its low carbon transition plan studies in 2023 and these studies are planned to be completed in 2024. In this context, the climate transition plan, which is among the strategic goals of Akenerji, supports the Company's environmental sustainability commitments and strategies for a low-carbon future. Low-carbon transition plan studies include Akenerji's goals of reducing carbon emissions, increasing renewable energy capacity, optimising energy efficiency and incorporating new technologies into operations. The plan is being developed as part of our Company's long-term sustainability strategy. As of 2023, no specific monetary incentive or bonus has been determined in this context, as the low-carbon transition plan studies have not been completed. However, since the climate transition plan is among the strategic goals of our Company, it is aimed to determine the incentives that will support the implementation of this plan in the future depending on the ESG Remuneration Policy.*

## Water

### (4.5.1.1) Position entitled to monetary incentive

#### Facility/Unit/Site management

- Business unit manager

### (4.5.1.2) Incentives

Select all that apply

- Bonus – set figure
- Promotion

### (4.5.1.3) Performance metrics

#### Targets

- Progress towards environmental targets
- Achievement of environmental targets

#### Resource use and efficiency

- Reduction of water withdrawals – direct operations
- Reduction in water consumption volumes – direct operations
- Improvements in water efficiency – direct operations
- Improvements in emissions data, reporting, and third-party verification

#### Pollution

- Reduction of water pollution incidents

### (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 Remuneration Policy for Senior Executives Senior executive remuneration consists of two components: Fixed and performance-based. Senior executive fixed salaries are determined as per international standards and legal obligations, taking into account macroeconomic data in the market, wage policies valid in the market, the size and longterm goals of the Company, and the positions of individuals. The basis of senior executive bonuses is calculated according to Company and individual performance. Information about the criteria is summarised below: Bonus Base: Bonus bases are updated annually and vary depending on the business size of the managers' positions. While updating bonus bases, senior management bonus policies in the market are taken into consideration. Company Performance: Company performance is obtained by measuring the financial and operational (market share, exports, foreign activities, productivity, etc.) targets given to the Company at the beginning of each year and at the end of the period. When determining company goals, sustainability of success and improvements compared to previous years are the principles considered. Individual Performance: In determining individual performance, financial, customer, process, technology, and long-term strategy-related goals are taken into account, along with company goals. Long-term sustainable improvement is considered outside of financial areas when measuring individual performance in parallel with company performance.*

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

Akenerji has set strategic targets to reduce water consumption in line with its environmental sustainability goals. Protection and efficient use of water resources is an important component of Akenerji's strategy to combat climate change. The Company implements various measures and projects to minimise water consumption while increasing operational efficiency. Akenerji has successfully achieved its target to reduce water consumption by 2023. This goal was achieved by optimising water use in power plants and implementing technologies that increase water efficiency. In line with water management, since the reduction of water consumption is among the strategic targets of the Company, premiums and incentives were determined in accordance with the ESG Remuneration Policy.

[Add row]

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

	Does your organization have any environmental policies?
	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

#### (4.6.1) Provide details of your environmental policies.

##### Row 1

#### (4.6.1.1) Environmental issues covered

Select all that apply

- Climate change
- Water
- Biodiversity

#### (4.6.1.2) Level of coverage

Select from:

- Organization-wide

#### (4.6.1.3) Value chain stages covered

Select all that apply

- Direct operations
- Upstream value chain

#### (4.6.1.4) Explain the coverage

Akenerji's approach to environmental issues has been developed in compliance with the Paris Climate Agreement and the United Nations Sustainable Development Principles under the sustainability policy. Our Company takes strategic steps to combat climate change and achieve sustainable development goals. Akenerji has an effort to reducing Scope 1 and 2 carbon emissions. In this context, our sustainability policy encourages the transition to

low-carbon energy sources and envisages investing in renewable energy projects to reduce emission intensity. By 2030, a target of 50% reduction in Scope 1&2 carbon emissions compared to 2017 levels has been set. Akenerji's sustainability policy is also in line with the United Nations Sustainable Development Goals (SDGs). In particular, the Company actively contributes to SDG 7 (Affordable and Clean Energy), SDG 13 (Climate Action), and SDG 12 (Responsible Production and Consumption). Environmental targets and strategic targets are regularly reviewed at the board level and the necessary resources are allocated to achieve these targets.

#### (4.6.1.5) Environmental policy content

##### Environmental commitments

- Commitment to a circular economy strategy
- Commitment to comply with regulations and mandatory standards
- Commitment to take environmental action beyond regulatory compliance
- Commitment to respect legally designated protected areas

##### Water-specific commitments

- Commitment to control/reduce/eliminate water pollution
- Commitment to reduce water consumption volumes
- Commitment to reduce water withdrawal volumes
- Commitment to the conservation of freshwater ecosystems

##### Social commitments

- Adoption of the UN International Labour Organization principles
- Commitment to promote gender equality and women's empowerment
- Commitment to respect internationally recognized human rights
- Other social commitment, please specify

#### (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

#### (4.6.1.7) Public availability

Select from:

- Publicly available

#### (4.6.1.8) Attach the policy

*sustainability policy.pdf*

[Add row]

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

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

Select from:

Yes

#### **(4.10.2) Collaborative framework or initiative**

Select all that apply

- Task Force on Climate-related Financial Disclosures (TCFD)
- Task Force on Nature-related Financial Disclosures (TNFD)
- UN Global Compact
- Other, please specify :UNPRI- UN Principles for Responsible Investment

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

*Within the scope of the UN Principles for Responsible Investment, We integrate Environmental, Social, Governance (ESG) issues into investment analysis and decision-making processes. We actively own this issue and integrate ESG issues into our ownership policies and practices. We require investee organisations to appropriately disclose their ESG practices. We support the acceptance and implementation of the Principles in the investment sector. We proceed with our investment decisions in accordance with our ESG policy. We disclose and communicate shareholder decisions on long-term ESG issues through our public communication platforms. Within the scope of UN Global Compact, We are a signatory of the UN Global Compact and ensure compliance with these principles in all our companies and facilities. ESG issues are covered in detail in our integrated annual reports. We expect our service providers to meet our ESG expectations and we develop processes to review our relations with those who do not.*

[Fixed row]

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

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

Select all that apply

- Yes, we engaged directly with policy makers

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

Select from:

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

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

Select from:

- No



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

*Akenerji has established its environmental policy and climate transition plan in full compliance with the Sustainable Development Goals (SDGs) and global environmental requirements. Our Company recognises environmental sustainability and combating climate change among its core values and conducts its operations and strategic decisions in line with these principles. Akenerji commits to contribute to global emission reduction targets and aims to lead the low-carbon transformation of the energy sector. Our strategy includes renewable energy investments, energy efficiency projects and the adoption of innovative technologies to reduce carbon emissions. In addition, while Akenerji complies with national and international environmental regulations through its environmental policies, it also participates in policy development processes on environmental issues. The initiatives we participate in include taking an active role in promoting sustainable energy policies, disseminating renewable energy resources and adopting climate-friendly practices in the energy sector.*

*[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**

*EU Green Deal*

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

*Select all that apply*

Climate change

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

##### **Transparency and due diligence**

Mandatory environmental reporting

#### **(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
- Participation in working groups organized by policy makers

#### **(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**

*Akenerji closely follows the developments regarding the EU Carbon Border Adjustment Mechanisms (CBAM) and monitors how the energy sector will be affected by this mechanism since the beginning of the process. Since the energy sector is one of the critical sectors that will be directly affected by the CBAM, Akenerji has adopted a proactive approach regarding the steps to be taken in this process. In addition, Akenerji participated in information and opinion exchange meetings organised by the Ministry of Trade, the relevant authority in Turkey. These meetings were organised to obtain information on the implementation process of the CBAM, to convey sectoral views and to contribute to the formulation of sustainable energy policies at the national level. Akenerji continues its efforts to create the necessary infrastructure to prepare for the mandatory reporting that will start in 2026 within the scope of the CBAM. In this context, it carries out a comprehensive preparation process to harmonise emission reduction strategies, data management and reporting processes.*

#### **(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

### **Row 2**

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

*Climate Change Law Turkey*

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

Select all that apply

Climate change

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

**Financial mechanisms (e.g., taxes, subsidies, etc.)**

Emissions trading schemes

#### **(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

#### **(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**

*Akenerji contributes to the creation and improvement of national regulations on the energy sector in Turkey, environmental sustainability and combating climate change. It supports the realisation of environmental targets by holding regular meetings and consultations with policy makers on issues such as energy efficiency, emission reduction and integration of renewable energy sources. It has actively participated in Turkey's Climate Law and contributed to this process with its sectoral know-how. During the period when the draft law was opened for consultation, opinions and suggestions were submitted through sectoral associations. In this context, it was aimed to contribute to the achievement of Turkey's climate targets by making suggestions on renewable energy investments, reducing carbon emissions and supporting sustainable energy policies. With the enactment of the Climate Law, Akenerji will further strengthen its strategies to combat climate change and sustainable development. In addition, Akenerji participates in policy studies and regulatory processes on carbon pricing mechanisms in order to comply with national and international regulations to reduce carbon emissions. In this context, information was exchanged with relevant stakeholders on the development and applicability of mechanisms such as emission trading system (ETS) and carbon tax, which are planned to be implemented in Turkey.*

**(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

Another global environmental treaty or policy goal, please specify :Turkey 2053 Net Zero Target

### Row 3

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

I-REC

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

Select all that apply

Climate change

**(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:

Global

**(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

Participation in working groups organized by policy makers

**(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**

*Akenerji played an active role in the process of developing policies for the expansion of the International Renewable Energy Certificate (IREC) certification system in Turkey. While IREC certificates allow energy consumers to prefer electricity generated from renewable energy sources, they are an important tool for Akenerji to strengthen its renewable energy portfolio and support low-carbon energy supply.*

**(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

**Row 4**

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

*Renewable Energy Resources Support Mechanism (YEKDEM)*

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

Select all that apply

Climate change

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

**Financial mechanisms (e.g., taxes, subsidies, etc.)**

Sustainable finance

**(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

**(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**

*Akenerji cooperates with relevant government agencies and regulatory authorities to develop policies for the expansion of renewable energy resources in Turkey. Within the scope of this cooperation, efforts are being made to encourage renewable energy investments, establish financial support mechanisms and increase the share of renewable energy in the energy mix.*

**(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

- Another global environmental treaty or policy goal, please specify :Turkey 2053 Net Zero Target

[Add row]

**(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
- IFRS
- TCFD

### (4.12.1.3) Environmental issues covered in publication

Select all that apply

- Climate change
- Water
- Biodiversity

### (4.12.1.4) Status of the publication

Select from:

- Complete

### (4.12.1.5) Content elements

Select all that apply

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Strategy                        | <input checked="" type="checkbox"/> Biodiversity indicators           |
| <input checked="" type="checkbox"/> Governance                      | <input checked="" type="checkbox"/> Public policy engagement          |
| <input checked="" type="checkbox"/> Emissions figures               | <input checked="" type="checkbox"/> Water accounting figures          |
| <input checked="" type="checkbox"/> Risks & Opportunities           | <input checked="" type="checkbox"/> Water pollution indicators        |
| <input checked="" type="checkbox"/> Value chain engagement policies | <input checked="" type="checkbox"/> Content of environmental policies |

### (4.12.1.6) Page/section reference

*Our report is available at the link below. You can access our performance data that we transparently share within the scope of climate, water and biodiversity from the GRI Content Index at the end of the report. Our future plans and low-carbon production roadmap can be found in the 'Strategy and Management' section of the Report.*  
[https://www.akenerji.com.tr/Dosya/Dokuman/Akenerji\\_Entegre\\_2023\\_25-04-24.pdf](https://www.akenerji.com.tr/Dosya/Dokuman/Akenerji_Entegre_2023_25-04-24.pdf)

### (4.12.1.7) Attach the relevant publication

*Akenerji\_Integrated\_2023-02-05-24\_.pdf*

### (4.12.1.8) Comment

*In our integrated report, we convey our strategic approach and the value we creating with our business model in detail under the headings of 'Economy, Employees, Society, Environment and Corporate Governance', together with our short, medium and long term targets. This report is the only report in which we report our financial and sustainability (Corporate Social Responsibility, Environmental-Social-Governance) performance.*

*[Add row]*



## C5. Business strategy

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

### Climate change

#### (5.1.1) Use of scenario analysis

Select from:

Yes

#### (5.1.2) Frequency of analysis

Select from:

Annually

### Water

#### (5.1.1) Use of scenario analysis

Select from:

Yes

#### (5.1.2) Frequency of analysis

Select from:

Annually

[Fixed row]

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

### Climate change

#### (5.1.1.1) Scenario used

Climate transition scenarios

IEA NZE 2050

#### (5.1.1.3) Approach to scenario

Select from:

Qualitative and quantitative

#### (5.1.1.4) Scenario coverage

Select from:

Business activity

### (5.1.1.5) Risk types considered in scenario

Select all that apply

- Acute physical
- Chronic physical
- Market
- Technology

### (5.1.1.6) Temperature alignment of scenario

Select from:

- 1.5°C or lower

### (5.1.1.7) Reference year

2017

### (5.1.1.8) Timeframes covered

Select all that apply

- 2050

### (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
- Climate change (one of five drivers of nature change)

#### Finance and insurance

- Cost of capital

#### Stakeholder and customer demands

- Impact of nature footprint on reputation
- 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

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

*Key Assumptions for Akenerji: Aggressive Decarbonisation Targets: Akenerji targets significant reductions in carbon intensity by 2030 and commits to align its operations with net zero emissions by 2050. Increase in Renewable Energy Investments: Significant investments are planned in solar and hydroelectric projects with a focus on energy storage and hybrid systems. Fossil Fuel Phase-out: As low-carbon energy sources become dominant, fossil-fuelled power plants, particularly natural gas, are planned to be phased out. Carbon Pricing and Regulatory Pressures: The impacts of increased carbon pricing on fossil fuel assets will drive carbon reduction*

*technologies or asset phase-out. Technological Advances: Investment in wind and solar energy with batteries and storage will be deployed to support decarbonisation efforts. Political and Legal Uncertainties: Carbon Pricing and Legislation: The NZE 2050 scenario requires the effective implementation of carbon pricing mechanisms. However, there are uncertainties about how carbon pricing policies and regulations will be shaped in the long term. Rapid increase or variability in carbon prices may affect Akenerji's costs and operational strategies. In addition, the incompatibility of carbon pricing policies between countries may create uncertainty on energy trade and competition conditions. Technological Constraints and Uncertainties: Energy Storage: The NZE 2050 scenario includes the integration of energy storage technologies. However, uncertainties remain about the current costs, efficiencies and grid integration of energy storage technologies. The widespread applicability of these technologies is critical for Akenerji's energy supply security and flexibility. Economic and Financial Constraints: Investment and Financing: High capital investments are required to achieve the transformation required by the NZE 2050 scenario. The financing required for renewable energy projects, energy storage systems and carbon mitigation technologies is dependent on uncertainties in economic conditions and the availability of financing sources. Global economic fluctuations can create uncertainty over financing costs and investor interest. Energy Market Dynamics: The economic sustainability of renewable energy projects depends on price fluctuations in the energy market. Volatility in fossil fuel prices and uncertainties in energy supply-demand dynamics may affect the profitability of renewable energy investments and Akenerji's revenue projections.*

### **(5.1.1.11) Rationale for choice of scenario**

*Akenerji considers the IEA Net Zero Emissions by 2050 (NZE 2050) scenario as the most comprehensive and applicable roadmap for combating climate change and sustainable transformation of the energy sector. The NZE 2050 scenario clearly sets out the role of the energy sector in line with the goal of limiting the global temperature increase to 1.5C and the steps to be taken to achieve this goal. The NZE 2050 scenario is in full compliance with the goals of the Paris Agreement, on which Akenerji's transition plan is based, and offers a concrete plan for reducing emissions globally and minimising the impacts of climate change. Akenerji recognises contributing to global climate targets and aligning its operations with these targets as a strategic priority. This scenario provides a framework in line with international standards while determining Akenerji's roadmap towards net zero emission targets. The NZE 2050 scenario aims to accelerate the transformation of the energy sector into a low-carbon future. Renewable energy, energy storage technologies and energy efficiency, which are the focal points of this scenario, form the basis of Akenerji's current and future investments. Akenerji aims to play a pioneering role in this transformation process and create a sustainable energy portfolio based on renewable energy sources. In addition, the NZE 2050 scenario provides a comprehensive framework for strategic planning and risk management for carbon mitigation in the energy sector. The NZE 2050 scenario provides guidance in critical areas such as carbon pricing, renewable energy integration, energy efficiency and deployment of low-carbon technologies. By adopting this scenario, Akenerji shapes its long-term strategies, is prepared for carbon pricing risks and strengthens its capacity to adapt to changes in market conditions.*

## **Water**

### **(5.1.1.1) Scenario used**

#### **Water scenarios**

- WWF Water Risk Filter

### **(5.1.1.3) Approach to scenario**

#### **Select from:**

- Qualitative and quantitative

### **(5.1.1.4) Scenario coverage**

#### **Select from:**

- Organization-wide

### (5.1.1.5) Risk types considered in scenario

Select all that apply

- Acute physical
- Chronic physical
- Policy
- Technology

### (5.1.1.7) Reference year

2022

### (5.1.1.8) Timeframes covered

Select all that apply

- 2050

### (5.1.1.9) Driving forces in scenario

#### Local ecosystem asset interactions, dependencies and impacts

- Changes to the state of nature
- Number of ecosystems impacted

#### Regulators, legal and policy regimes

- Global regulation

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

*Assumptions Comprehensive Risk Coverage: It is assumed that the WWF Water Risk Filter provides a holistic assessment of water-related risks, covering physical, regulatory and reputational aspects of Akenerji's operations. Alignment with Global Standards: The tool is aligned with global frameworks such as SDG 6.5 and provides a globally recognised context for assessing water risks, taking into account socio-economic trends (SSP2) and climate scenarios. Geographical Accuracy: The tool is assumed to accurately reflect local water risks, taking into account the specific geographical and ecological conditions of each facility. Scaled Risk Assessment: The risk scale from very low to very high is assumed to facilitate targeted risk management by providing a detailed view of water risks. Uncertainties: Climate Change Impacts: The future impacts of climate change on water availability and quality are uncertain, which may affect the accuracy of risk estimates in the long term. Changes in Policies: Uncertainty in future water policies and regulations can affect risk outcomes by potentially changing the expected regulatory environment. Stakeholder Perceptions: Reputational risk assessments are based on stakeholders' current perceptions, and these perceptions may change over time, affecting the assessment of reputational risks. Limitations: Data Limitations: The accuracy of risk assessment is limited by the quality and availability of local water data, which may not always capture the full complexity of water risks. Static Scenarios: The WWF Water Risk Filter can provide a snapshot of risk under current conditions, but may not fully account for dynamic changes in water systems and ecosystems over time. Simplifying Complex Systems: While the tool covers multiple risk dimensions, it may simplify complex hydrological and ecological interactions, leading to an incomplete picture of risk in certain contexts.*

### (5.1.1.11) Rationale for choice of scenario

*WWF Water Risk Filter is a critical tool for Akenerji to comprehensively assess water risks, comply with global standards and develop sustainable water management strategies. Akenerji uses the WWF Water Risk Filter tool to comprehensively assess the water risks and water dependency of its operations. The main reasons for using this tool are as follows: Comprehensive Water Risk Assessment: WWF Water Risk Filter is an integrated tool that*

can comprehensively assess different dimensions of water risks such as physical, regulatory and reputational. By using this tool, Akenerji is able to analyse various risk factors such as water scarcity, flood risk, water quality and ecosystem services in the regions where it operates in detail and assess their impact on its operations.

**Compliance with Global Standards:** WWF Water Risk Filter has been developed in line with the Sustainable Development Goals (SDGs) and SDG 6.5 (Integrated Water Resources Management). By using the WWF Water Risk Filter tool, Akenerji aims to conduct water risk assessments in accordance with global standards and harmonise its water management strategies with international best practices. **Strategic Planning and Risk Management:** WWF Water Risk Filter provides detailed analyses of Akenerji's water risks that can be integrated into strategic planning and risk management processes. **Assessment of Local and Regional Risks:** WWF Water Risk Filter has the ability to assess water risks at local and regional level. Through this tool, Akenerji is able to analyse water risks specific to the location of each power plant and thus develop location-based risk management strategies.

[Add row]

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

### **Climate change**

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

Select all that apply

- Risk and opportunities identification, assessment and management
- Strategy and financial planning
- Resilience of business model and strategy
- Capacity building
- Target setting and transition planning

#### **(5.1.2.2) Coverage of analysis**

Select from:

- Organization-wide

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

**Transition to Renewable Energy:** The scenario analysis reinforced the strategic transition towards renewable energy sources. Akenerji has committed to increase its renewable energy capacity and aims to increase the weight of renewable energy sources in its energy portfolio by 50% by 2030. As part of this strategy, Akenerji has budgeted its investments in wind, solar and hydroelectric power plant projects until 2025. This change is expected to significantly reduce the company's carbon emission intensity and is in line with NZE 2050's goal of decarbonising the energy sector. **Innovation and Technological Advancements:** The results of the scenario analysis have led to a focus on technological innovation, including investments in hybrid systems and battery technologies. Akenerji forecasts an investment need of USD 6-10 million for small-scale battery storage investments for 20 MW 6-10 million for developing battery storage solutions that enable the integration of intermittent renewable energy sources and increase grid stability. If the investment is feasible, battery storage investments can be scaled up to 100 MW within 5 years. The investment is expected to create a more resilient and sustainable business model by optimising energy supply and demand. Within the scope of the scenario, Akenerji envisages avoiding potential carbon pricing costs, which are calculated as 10/ton CO<sub>2</sub> in 2026 and are projected to increase every year, by significantly reducing its carbon footprint. **Capitalising on Market Opportunities:** The scenario analysis identified significant market opportunities arising from the increasing demand for green energy. Akenerji has a good market opportunity to attract environmentally conscious customers through IREC by increasing its renewable energy capacity and to provide high pricing for renewable energy products.

## Water

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

Select all that apply

- Risk and opportunities identification, assessment and management
- Strategy and financial planning
- Resilience of business model and strategy
- Capacity building
- Target setting and transition planning

### (5.1.2.2) Coverage of analysis

Select from:

- Organization-wide

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

*Thanks to the WWF Water Risk Filter analysis, Akenerji has identified critical areas to focus on to increase its operational sustainability and thus strengthened its overall business model in line with environmental dependencies, impacts, risks and opportunities. The results of Akenerji's scenario analysis using the WWF Water Risk Filters significantly impacted the company's corporate strategy and financial planning. The analysis identified key water-related risks, including physical, regulatory and reputational risks, as well as biodiversity risks associated with the company's operational sites: Impact on Business Strategy: The scenario analysis revealed different levels of physical water risks at Akenerji's generation plants, with particularly high risks identified at Ayyıldız WPP, Erzin NGCCPP and Uluabat HEPP. In response, Akenerji prioritised investments in water management and conservation measures to mitigate these risks. As a result of the assessments made, the Company will plan the implementation of advanced water efficient technologies and sustainable water use practices to reduce the Company's dependence on sensitive water resources. Impact on Financial Planning: The analysis has led Akenerji to allocate specific budgets to improve water security and ecosystem management. Akenerji is aware of medium to high biodiversity risks in many of its power plants and aims to invest in biodiversity conservation initiatives and infrastructure improvements to ensure long-term operational flexibility.*

[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:

- No

### (5.2.4) Plan explicitly commits to cease all spending on, and revenue generation from, activities that contribute to fossil fuel expansion



Select from:

No, but we plan to add an explicit commitment within the next two years

### **(5.2.6) Explain why your organization does not explicitly commit to cease all spending on and revenue generation from activities that contribute to fossil fuel expansion**

*Akenerji is actively engaged in the development and implementation of its climate transition plan, focusing on strategic investments and the adoption of emission reduction technologies to align with global decarbonization efforts. Our transition strategy encompasses significant investments in renewable energy projects, energy storage solutions, and low-carbon technologies aimed at reducing our overall carbon footprint in the medium and long term. As part of our commitment to climate action, we are currently evaluating the Science-Based Targets initiative framework to ensure our emission reduction targets are scientifically aligned with the Paris Agreement's goals. The decision on submitting our SBTi application is expected to be finalized within 2024. This decision-making process involves a comprehensive assessment of our operations, investment strategies, and long-term sustainability goals to ensure that our targets are both ambitious and achievable. While we are making significant progress in our climate transition efforts, it is crucial to emphasize that our approach is guided by a commitment to accuracy and transparency. Sharing premature or speculative information regarding our transition plan or emission reduction targets could lead to misleading interpretations by the public and stakeholders. Therefore, until our targets and plans are thoroughly evaluated and officially established, we aim to avoid disseminating any information or assumptions that could be considered misleading or incorrect. Our priority remains on developing a robust, scientifically grounded climate transition plan that provides clear and transparent pathways to reducing emissions. We are dedicated to ensuring that the information we share with the public and our stakeholders is accurate, validated, and reflective of our ongoing efforts to contribute to a sustainable and low-carbon future. By the time our SBTi submission and climate transition strategy are finalized, we will be prepared to communicate our detailed plans, targets, and progress in a manner that upholds our commitment to transparency and aligns with industry best practices. Until then, we will continue to focus on advancing our investment in emission reduction technologies and renewable energy projects as part of our overarching strategy to support the global transition to a net-zero economy.*

### **(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**

*Akenerji's strategy includes a comprehensive climate transition plan that outlines our pathway to align with global climate goals and ensure the long-term sustainability of our business model in a net-zero carbon economy. Our climate transition plan is built on several key assumptions and dependencies that guide our approach to emission reduction and sustainable growth. Transition to Renewable Energy Sources: Akenerji assumes a significant shift towards renewable energy sources as a core component of its transition plan. We anticipate that wind, solar, and hydroelectric power will play a pivotal role in our energy mix, gradually replacing fossil fuels. This assumption aligns with our ongoing investments in projects like Kemah HES and hybrid solar systems. Technological Advancements in Emission Reduction: Our Plan assumes continuous advancements in emission reduction technologies, such as energy storage, and battery technologies. These technologies are expected to become more efficient and cost-effective, enabling us to reduce our carbon footprint more rapidly. Regulatory and Policy Support: Our climate transition strategy assumes that governments and regulatory bodies will continue to implement policies that support the transition to a low-carbon economy. Our transition plan includes expectations of carbon pricing mechanisms, renewable energy incentives, and climate-related regulations that will drive the adoption of clean energy solutions. Key Dependencies: The successful implementation of our climate transition plan is dependent on securing adequate capital investment to finance renewable energy projects, energy storage systems, and other low-carbon technologies. Our plan depends on the continued maturity and scalability of renewable energy technologies and energy storage systems. The deployment of large-scale battery storage,*



smart grids, and carbon capture technologies is crucial for achieving our emission reduction targets and ensuring grid stability.

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

*Akenerji is actively engaged in the development and implementation of its climate transition plan, focusing on strategic investments and the adoption of emission reduction technologies to align with global decarbonization efforts. Our transition strategy encompasses significant investments in renewable energy projects, energy storage solutions, and low-carbon technologies aimed at reducing our overall carbon footprint in the medium and long term. As part of our commitment to climate action, we are currently evaluating the Science-Based Targets initiative (SBTi) framework to ensure our emission reduction targets are scientifically aligned with the Paris Agreement's goals. The decision on submitting our SBTi application is expected to be finalized within 2024. This decision-making process involves a comprehensive assessment of our operations, investment strategies, and long-term sustainability goals to ensure that our targets are both ambitious and achievable. While we are making significant progress in our climate transition efforts, it is crucial to emphasize that our approach is guided by a commitment to accuracy and transparency. Sharing premature or speculative information regarding our transition plan or emission reduction targets could lead to misleading interpretations by the public and stakeholders. Therefore, until our targets and plans are thoroughly evaluated and officially established, we aim to avoid disseminating any information or assumptions that could be considered misleading or incorrect.*

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

Select all that apply

No other environmental issue considered

[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

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

*By focusing on the protection of natural life and prevention of environmental pollution in all business processes at Akenerji facilities, we ensure that the highest amount of energy production is realised with the least possible use of resources. While setting our strategic targets for 2023, we also assessed the risks and opportunities related to climate change. In the first half of 2023, we set our strategic goals for 2024 and beyond through intensive workshops with high participation. All managers in manager and higher positions participated in these workshops. In these workshops, we evaluated the threats and opportunities in the sector, analysed the strengths and weaknesses of our company. As the final stage, we designed the future of our company with brainstorming, where we discussed our common predictions with all participants. In this context, we determined the main and sub-targets of our company, the actions we need to take within the organisation in the short, medium and long term to achieve these goals, and the projects that need to be done. In the last quarter of 2023, an inclusive risk and opportunities survey in parallel with the TCFD (Task Force on Climate Related Financial Disclosures) Framework and CDP Climate Change Programme reporting was prepared by our consultant and conducted online with the participation of senior and middle management representatives. 243 people from all management levels, representing 81% of our employees, participated in the survey. The results of the survey were analysed in three categories: 1-All participants consolidated 2-Offices 3-Facilities. Six of the 13 risks listed in the survey were in the area of high impact and probability common to all groups. Our employees who participated in the survey shared their feedback on the risks as well as the opportunities and other opinions they foresee on these issues. Among physical risks, 'Water Stress/Water Shortage' and 'Drought/Freeze' were identified as the most important physical risks by all groups. 'Severe Storms and Floods' was identified as the physical risk with the lowest probability and impact. Among the transition risks, 'Market-3: Increase in raw material and input costs' and natural gas costs were identified as the most important risk by all groups and 'Market-2: Uncertainties in the market' were identified as the second most important risk by all groups. Legal Regulations-2 (Carbon pricing mechanisms) and Legal Regulations-3 (Increased emission reporting obligations) were identified as other significant transition risks by the General Directorate.*

## 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**

*We received the opinions, suggestions and expectations of all our stakeholders for our downside and upside risks and opportunities. In this context, in the last quarter of 2023, an inclusive risk and opportunities survey in parallel with the TCFD (Task Force on Climate Related Financial Disclosures) Framework and CDP Climate Change Programme reporting was prepared by our consultant and conducted online with the participation of senior and middle management representatives. 243 people from all management levels, representing 81% of our employees, participated in the survey. Internal Stakeholder Opinions (Opportunities and Suggested Actions) - Prioritising wind power plant projects in terms of diversity as a precaution against dry seasons - Increasing investments in solar and wind energy systems, especially in Central Anatolia, and operating them in an integrated manner with existing systems - Providing training to personnel on the structure and installation of solar panels, one of the developing technologies every day, and Akenerji personnel installing solar panels at power plant sites - Establishing a solar energy panel production facility - Establishing a hydrogen production facility - Partnership with battery production companies for electric vehicles, Establishing facilities that will ensure the disposal or recycling of these batteries - Supporting non-governmental organisations with projects on climate change - Establishing business partnerships in agricultural food supply due to the transition from traditional agriculture to soilless and more water-based agriculture in the world - Establishing facilities that convert seawater into drinking water from today due to the water scarcity that will definitely be experienced in the coming years due to climate change - Strategic and financial opportunities will arise spontaneously by ensuring resilience through a good preparation process for the risks related to climate change, and this process will also create opportunities for the company to grow in other areas.*

## **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**

*In the studies we conducted, we evaluated the threats and opportunities in Akenerji and the sector in which we operate, analysed the strengths and weaknesses of our company. As a final stage, we designed the future of our company with a brainstorming session in which we discussed our common foresights with all participants. In this context, we determined the main and sub-targets of our company, the actions we need to take within the organisation in the short, medium and long term in order to achieve these targets, and the projects that need to be carried out. In this context, we determined the areas that we will be affected operationally and our transition risks as follows. Description of Transition Risks Legal Regulations 1: Obligations and regulations regarding existing products, services or processes Legal Regulations 2: Carbon pricing mechanisms Legal Regulations 3: Increased emission reporting obligations Technology: Transition to lower emission technology Market-1: Adaptation to*

changes in customer preferences Market-2: Market uncertainties Market-3: Increase in raw material and input costs Reputation-1: Negative perception of the industry Reputation-2: Increased stakeholder concern or exposure to negative stakeholder feedback

[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
- Indirect costs
- Capital expenditures

#### **(5.3.2.2) Effect type**

Select all that apply

- Risks

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

Select all that apply

- Climate change
- Water

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

*Environmental risks and opportunities are fully integrated into Akenerji's financial planning. The impacts of climate-related risks on future cash flows, capital expenditures and long-term profitability are assessed. Carbon pricing scenario analyses are used to assess how future legislative changes may affect the Company's financial performance and budget is allocated for resilience building projects. Akenerji's financial planning is deeply affected by environmental risks and opportunities. By proactively managing these risks and capitalising on opportunities through targeted investments in renewable energy, energy storage and hybrid projects, we secure the Company's long-term sustainability and financial strength in the face of evolving environmental challenges. Environmental risks and opportunities are an integral part of our financial planning and decision-making processes. The increasing frequency of extreme weather events, changing legal regulations and the transition to a low carbon economy have significant impacts on our operations and long-term strategy. Regulatory and Market Risks: Carbon Pricing and Emission Regulations: The potential introduction of carbon pricing mechanism and stricter emission regulations in Turkey and globally directly affects our financial planning. In order to mitigate the increased cost risk due to carbon pricing, Akenerji is making the necessary budgetary efforts to invest in low-carbon technologies and renewable energy projects such as wind, solar and hydroelectricity. These investments are in line with our broader strategy to reduce our carbon footprint as well as reduce our exposure to future carbon costs. Energy Transition Risks: The global transition from fossil fuels to renewable energy creates both challenges and opportunities. Akenerji has proactively integrated these risks into its financial planning by investing in energy storage systems and battery technology to ensure and optimise the use of intermittent renewable resources. Extreme Weather Events: Increasing frequency of droughts, floods and heat waves pose a risk to our hydroelectric*

power plants and energy generation capacity. To mitigate these risks, Akenerji has allocated financial resources for infrastructure resilience projects and monitoring systems that will help optimise water resources management. In addition to minimising physical risks, these investments also ensure the continuity of our energy generation in extraordinary weather conditions.

## Row 2

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

Select all that apply

- Revenues
- Direct costs

### (5.3.2.2) Effect type

Select all that apply

- Opportunities

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

Select all that apply

- Climate change
- Water

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

*Financial Opportunities Renewable Energy Investments: Increasing demand for clean energy and environmental opportunities such as government incentives for renewable energy projects have influenced Akenerji's capital allocation strategy. We increased our investments in wind, solar and hydroelectric projects that will increase our revenue stream while reducing our carbon footprint. These investments are expected to provide long-term financial returns by positioning Akenerji as an important player in the transition to a low-carbon energy market. Energy Efficiency and Cost Savings: Akenerji has succeeded in reducing its operational costs by implementing energy efficiency measures and improving operational technologies. Thanks to these initiatives, which we include in our financial planning, we increase our profitability by reducing energy consumption, operational costs and emissions.*

[Add row]

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

	Identification of spending/revenue that is aligned with your organization's climate transition
	Select from: <input checked="" type="checkbox"/> No, but we plan to in the next two years

[Fixed row]

## **(5.5) Does your organization invest in research and development (R&D) of low-carbon products or services related to your sector activities?**

### **(5.5.1) Investment in low-carbon R&D**

Select from:

Yes

### **(5.5.2) Comment**

*Akenerji's continuous investment into new technologies not only provides operational flexibility but also plays an important role in achieving its long-term growth and sustainability targets. Akenerji's technology investment strategy enables the direct implementation of innovative technologies that have already been developed and matured in the energy sector. For example, advanced technologies such as renewable energy sources (wind, solar, hydro) and energy storage systems stand out as proven solutions worldwide. By investing in such technologies, Akenerji keeps pace with the rapid transformation in the sector and bases its energy generation capacity on a low-carbon and sustainable basis. Although Akenerji does not directly establish an R&D centre to develop low-carbon products and services in the energy sector, it supports the low-carbon transition process by investing in innovative and sustainable technologies. The Company allocates significant resources to renewable energy projects, hybrid projects and battery and storage technologies in order to reduce carbon intensity in energy generation and adapt to climate change risks. The strategic approach applied increases Akenerji's operational efficiency while reducing carbon emissions, enabling the Company to achieve its long-term sustainability goals. For example, investments in solar and wind energy projects and battery storage technologies transform the Company's energy portfolio into a low-carbon structure and significantly reduce its carbon footprint. Akenerji continues to use and invest in the best available technologies to achieve global climate targets and mitigate climate risks in line with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). Accordingly, investments made for the adaptation and implementation of low-carbon technologies protect the Company's future revenues against climate risks.*

*[Fixed row]*

## **(5.5.7) Provide details of your organization's investments in low-carbon R&D for your sector activities over the last three years.**

### **Row 1**

#### **(5.5.7.1) Technology area**

Select from:

Battery storage

#### **(5.5.7.2) Stage of development in the reporting year**

Select from:

Small scale commercial deployment

#### **(5.5.7.3) Average % of total R&D investment over the last 3 years**

20



**(5.5.7.4) R&D investment figure in the reporting year (unit currency as selected in 1.2) (optional)**

0

**(5.5.7.5) Average % of total R&D investment planned over the next 5 years**

30

**(5.5.7.6) Explain how your R&D investment in this technology area is aligned with your climate commitments and/or climate transition plan**

*In the last three years, Akenerji has strategically focused on developing its renewable energy portfolio and integrating low-carbon technologies into its operations. While the Company prioritises investments in existing technologies such as solar and wind energy, there will be a significant increase in both R&D and technology investments in the next five years. These investments will primarily focus on the development of energy storage solutions, particularly battery technologies, which play a critical role in Akenerji's climate transformation plan. The development of battery storage is of great importance in terms of optimising the use of renewable energy, ensuring energy security and balancing supply during periods of variable production. These investments not only support the company's goal of reducing its carbon footprint, but also increase its resilience to climate-related risks and position Akenerji to sustain its future profitability in a low-carbon economy. As part of the transition strategy, Akenerji will incorporate innovative technologies that will increase operational efficiency and further reduce emissions, enabling better management of emission reduction targets and climate-related risks and opportunities*

**Row 2**

**(5.5.7.1) Technology area**

Select from:

- Hydropower energy generation

**(5.5.7.2) Stage of development in the reporting year**

Select from:

- Full/commercial-scale demonstration

**(5.5.7.3) Average % of total R&D investment over the last 3 years**

20

**(5.5.7.4) R&D investment figure in the reporting year (unit currency as selected in 1.2) (optional)**

0

**(5.5.7.5) Average % of total R&D investment planned over the next 5 years**

20

**(5.5.7.6) Explain how your R&D investment in this technology area is aligned with your climate commitments and/or climate transition plan**



Akenerji aims to increase efficiency, optimise water resources management and reduce emissions by incorporating the latest technologies into its hydropower plants. As an important part of the Company's climate transformation plan, these improvements contribute to long-term climate resilience while ensuring higher operational efficiency. When the 198 MW Kemah HEPP is commissioned, energy intensity will be significantly reduced in line with the climate transition plan, and significant action will have been taken against operational and financial risk factors that are expected to be affected by climate-related risks.

### Row 3

#### (5.5.7.1) Technology area

Select from:

Other, please specify :Digital technology

#### (5.5.7.2) Stage of development in the reporting year

Select from:

Full/commercial-scale demonstration

#### (5.5.7.3) Average % of total R&D investment over the last 3 years

10

#### (5.5.7.4) R&D investment figure in the reporting year (unit currency as selected in 1.2) (optional)

0

#### (5.5.7.5) Average % of total R&D investment planned over the next 5 years

10

#### (5.5.7.6) Explain how your R&D investment in this technology area is aligned with your climate commitments and/or climate transition plan

Akenerji uses a range of advanced software solutions to support critical decision-making processes in its climate transformation plan. Systems such as ETRM (Energy Trade Risk Management), Erzin Dispatch, Price Forecast and Generator provide real-time data and insights necessary to manage risks and optimise opportunities in both energy and carbon markets. Meteorological data modelling helps predict the impact of climate-related factors (such as wind, solar and hydrological conditions) on power generation. These forecasts are integrated into Akenerji's operational planning, enabling more accurate production and shipment decisions. Through price modelling tools, Akenerji monitors market fluctuations in electricity, gas and carbon prices to ensure that its investments and operations are in line with market trends and regulatory developments. This is especially important as carbon pricing mechanisms develop. The software that we use improves Akenerji's ability to analyse scenarios, forecast market conditions and make data-driven investment decisions, providing flexibility and profitability as the company moves towards a low-carbon future.

[Add row]

### (5.7) Break down, by source, your organization's CAPEX in the reporting year and CAPEX planned over the next 5 years.

#### Coal – hard

**(5.7.5) Explain your CAPEX calculations, including any assumptions**

*Not applicable.*

**Lignite**

**(5.7.5) Explain your CAPEX calculations, including any assumptions**

*Not applicable.*

**Oil**

**(5.7.5) Explain your CAPEX calculations, including any assumptions**

*Not applicable.*

**Gas**

**(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)**

1

**(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

20

**(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

20

**(5.7.4) Most recent year in which a new power plant using this source was approved for development**

2022

**(5.7.5) Explain your CAPEX calculations, including any assumptions**

*Although the focus is on renewables, Akenerji recognizes the importance of natural gas as a transition fuel during the shift to a low-carbon economy. Therefore, 20% of Akenerji's planned CAPEX over the next five years will be directed toward maintaining and enhancing the Erzin CCGT.. These investments will focus on: - Improving plant efficiency to reduce natural gas consumption per MWh produced. - Implementing emissions reduction technologies to limit the plant's environmental impact. - Ensuring the plant's role as a backup energy source to complement intermittent renewable energy generation.*

**Sustainable biomass**

**(5.7.5) Explain your CAPEX calculations, including any assumptions**

*Not applicable.*

## Other biomass

### (5.7.5) Explain your CAPEX calculations, including any assumptions

*Not applicable.*

## Waste (non-biomass)

### (5.7.5) Explain your CAPEX calculations, including any assumptions

*Not applicable.*

## Nuclear

### (5.7.5) Explain your CAPEX calculations, including any assumptions

*Not applicable.*

## Geothermal

### (5.7.5) Explain your CAPEX calculations, including any assumptions

*Not applicable.*

## Hydropower

### (5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

1

### (5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

20

### (5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

20

### (5.7.4) Most recent year in which a new power plant using this source was approved for development

2022

### (5.7.5) Explain your CAPEX calculations, including any assumptions

*A significant portion of Akenerji's CAPEX in the reporting year was dedicated to renewable energy sources, including expanding solar and wind energy capacity and modernizing hydroelectric facilities. These investments are aligned with the company's carbon reduction goals and the transition to a low-carbon energy future. Over the next five years, Akenerji plans to continue its strategic shift toward low-carbon technologies. A large portion of the*

*planned CAPEX will go toward further expansion in solar, wind, and battery storage projects, which are critical for achieving the company's 2030 and 2050 emissions reduction goals.*

*[Fixed row]*

### **(5.7.1) Break down your total planned CAPEX in your current CAPEX plan for products and services (e.g. smart grids, digitalization, etc.).**

#### **Row 1**

##### **(5.7.1.1) Products and services**

*Select from:*

Large-scale storage

*[Add row]*

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

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

10

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

10

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

10

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

10

#### **(5.9.5) Please explain**

*Akenerji's OPEX planning is focused on increasing operational efficiency in water management processes and reducing water consumption. In order to ensure efficient use of water in energy generation processes, investments are continuously made in periodic maintenance and monitoring systems. Processes related to the use of water in hydroelectric power plants are optimised through regular maintenance and monitoring activities, resulting in lower operational costs in the long term. Akenerji also better guides its operational decisions by monitoring hydrological data and integrating climate forecasts into water management processes. Efficient use of water resources both reduces the risk of excessive water use and ensures the sustainable use of water resources in energy generation.*

*[Fixed 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: <input checked="" type="checkbox"/> Yes	Select all that apply <input checked="" type="checkbox"/> Carbon

[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

- Set a carbon offset budget climate-related policies and targets
- Drive low-carbon investment
- Conduct cost-benefit analysis
- Identify and seize low-carbon opportunities
- Influence strategy and/or financial planning
- Setting and/or achieving of

##### (5.10.1.3) Factors considered when determining the price

Select all that apply

- Alignment to international standards

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

*Akenerji implements the carbon pricing mechanism as an internal strategy in preparation for future regulatory risks and market conditions. This approach aims to proactively manage the cost impacts of the Turkish Emission Trading System (ETS), which is expected to be operational in 2026, and the parallel regulations with the EU Emission Trading System (EU ETS) Akenerji's internal carbon pricing is based on the allocation mechanisms of the EU ETS and projections for the end of free allowances in 2034. It is projected that Turkey's ETS system will have a similar structure to the EU ETS and carbon prices will gradually increase following the harmonisation process starting in 2026. In this context, Akenerji determines its carbon price projections by taking into account both the EU ETS and the peak year processes specified in Turkey's National Contribution Declaration (NDC).*

##### (5.10.1.5) Scopes covered

Select all that apply

- Scope 1
- Scope 2

### (5.10.1.6) Pricing approach used – spatial variance

Select from:

Differentiated

### (5.10.1.7) Indicate how and why the price is differentiated

*Akenerji operates a diverse portfolio of energy assets, including natural gas power plants, hydroelectric power stations, wind farms, and solar energy projects. Given this diversity, a single uniform internal carbon price would not accurately reflect the varying levels of carbon intensity and financial risks associated with each asset type. By adopting a differentiated approach, we can apply different internal carbon prices that are tailored to the unique carbon footprint and financial impact of each type of asset within our portfolio. The differentiated approach allows us to more effectively manage carbon-related risks and enhance financial resilience. For example, we apply a higher internal carbon price to natural gas power plants to reflect the greater regulatory and market risks associated with their higher carbon emissions. Incentivizes the transition toward cleaner technologies and drives investments in low-carbon projects, such as renewables and energy storage systems. Conversely, a lower internal carbon price is applied to renewable energy projects, reflecting their lower exposure to carbon pricing mechanisms. Lastly, Using a differentiated internal carbon price provides a more nuanced understanding of the potential financial impact of carbon regulations on various projects. By applying different carbon prices to different projects, Akenerji can better evaluate the long-term profitability and risk of future investments.*

### (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

*Our carbon pricing expectations take a long-term view of the evolving carbon market in Turkey and the EU. We expect carbon prices to increase significantly as free allowances in the Turkish ETS, which is expected to be launched in 2026, are phased out as in the EU ETS and the ETS system becomes more stringent. We envisage the introduction of a carbon pricing mechanism in Turkey that is closely aligned with the European Union Emissions Trading System (EU ETS). With the harmonised ETS to be put into operation, it is planned to harmonise Turkey's climate policies with the EU as part of Turkey's efforts to achieve its climate targets and facilitate the transition to a low-carbon economy. In 2026, the initial carbon price is set at 10/ton CO<sub>2</sub> e. This value is set in line with the initial levels in the EU ETS, in line with the harmonisation process envisaged when Turkey's ETS system first became operational. An annual increase of 10 per cent is foreseen until 2030. After 2030, a fully harmonised system with the EU is envisaged. Free allowances, which will be terminated in 2034 in the EU ETS, will follow a similar process in Turkey and will be terminated after the peak year (2038).*

### (5.10.1.10) Minimum actual price used (currency per metric ton CO<sub>2</sub>e)

10

### (5.10.1.11) Maximum actual price used (currency per metric ton CO<sub>2</sub>e)

50

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

Select all that apply

Operations

Public policy engagement

Risk management

Impact management

- Capital expenditure
- Opportunity management

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

Select from:

- Yes, for all decision-making processes

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

99

#### **(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**

*Akenerji's internal carbon pricing is used as a strategy to both manage the carbon costs of existing fossil-fuelled generation facilities and to reduce its carbon footprint by investing in renewable energy. In line with the 50% emission reduction target by 2030, internal carbon pricing shapes our company's capital investments, operational costs and long-term sustainability strategy. Investments in renewable energy projects and energy storage systems are evaluated by taking into account the internal carbon price and the effects of carbon costs on the profitability of the projects are calculated. In line with the carbon pricing for Erzin NGCCPP, it is foreseen that it will create an increasing cost pressure every year and the plant will be gradually closed and replaced by renewable energy sources. The gradual increase in carbon prices accelerates the transition to low-carbon technologies in line with Akenerji's 2050 net zero target.*

[Add row]

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

#### **Suppliers**

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

Select from:

- Yes

#### **(5.11.2) Environmental issues covered**

Select all that apply

- Climate change
- Water

#### **Customers**

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



Select from:

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

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

Select from:

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

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

*Within the scope of prioritisation studies, efforts to involve the relevant stakeholder group in the process are planned to be completed next year.*

## **Investors and shareholders**

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

Select from:

- Yes

### **(5.11.2) Environmental issues covered**

Select all that apply

- Climate change  
 Water

## **Other value chain stakeholders**

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

Select from:

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

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

Select from:

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

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

*Within the scope of prioritisation studies, efforts to involve the relevant stakeholder group in the process are planned to be completed next year.*

*[Fixed row]*

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

	Assessment of supplier dependencies and/or impacts on the environment
Climate change	<i>Select from:</i> <input checked="" type="checkbox"/> No, we do not currently assess the dependencies and/or impacts of our suppliers, but we plan to do so within the next two years
Water	<i>Select from:</i> <input checked="" type="checkbox"/> No, we do not currently assess the dependencies and/or impacts of our suppliers, but we plan to do so within the next two years

[Fixed row]

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

### **Climate change**

#### **(5.11.2.1) Supplier engagement prioritization on this environmental issue**

*Select from:*

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

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

*Select all that apply*

- Business risk mitigation
- Regulatory compliance
- Strategic status of suppliers
- Supplier performance improvement

#### **(5.11.2.4) Please explain**

*Within the scope of prioritisation studies, efforts to involve the relevant stakeholder group in the process are planned to be completed next year.*

### **Water**

#### **(5.11.2.1) Supplier engagement prioritization on this environmental issue**

*Select from:*

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

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

*Select all that apply*

- Business risk mitigation
- Regulatory compliance
- Strategic status of suppliers
- Supplier performance improvement

#### **(5.11.2.4) Please explain**

*Within the scope of prioritisation studies, efforts to involve the relevant stakeholder group in the process are planned to be completed next year.*

*[Fixed row]*

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

#### **Climate change**

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

Select from:

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

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

Select from:

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

#### **(5.11.5.3) Comment**

*Akenerji has a total of 738 suppliers, 39% of which are local suppliers. Environmental and social criteria are taken into consideration in our contracts with our suppliers and among our supplier selection criteria. This issue is also among the material issues of our company. In the supplier selection process, we take into account the existence of Management Systems such as ISO 9001 Quality, ISO 14001 Environment, ISO 45001 OHS, ISO 50001 Energy, Product Responsibility, Diversity and Inclusion, Human Rights criteria. We demand corrective actions from our active suppliers that we determine do not comply with basic environmental criteria. We terminate cooperation with suppliers that we determine to have any negative environmental impact. Supplier Evaluation We evaluated our active suppliers in accordance with the Supplier Performance Evaluation according to the evaluation parameters of 'Quality Score', 'Termine Compliance Score' and 'Receiving Score'. According to the evaluation results, we do not have any suppliers with 'Low Performance' status, and we provided the necessary feedback to our suppliers in the 'Suppliers Requiring Improvement' group.*

#### **Water**

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

Select from:

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

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

Select from:

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

### **(5.11.5.3) Comment**

*In the supplier selection process, we take into account the existence of Management Systems such as ISO 9001 Quality, ISO 14001 Environment, ISO 45001 OHS, ISO 50001 Energy, Product Responsibility, Diversity and Inclusion, Human Rights criteria. We demand corrective actions from our active suppliers that we determine do not comply with basic environmental criteria. We terminate cooperation with suppliers that we determine to have any negative environmental impact. We expect our suppliers to comply with the rules written in the general conditions of procurement, contracts, specifications and other similar documents regulating our business relations with our suppliers, as well as the regulations on business ethics, human rights (no child labour, forced labour, discrimination, inequality, human rights violations, etc.), occupational health and safety. In order to help our suppliers strengthen their business practices and integrate sustainability into their business processes, we continued to raise awareness on environmental, social and governance factors and awareness and compliance with Akenerji policies to control greenhouse gas emissions. In order to identify and monitor these impacts of our suppliers, we implemented the 'Sustainability Supplier Evaluation Survey' in the 2023 operating period.  
[Fixed row]*

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

#### **Climate change**

#### **(5.11.6.1) Environmental requirement**

Select from:

- Compliance with an environmental certification, please specify :14001

#### **(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement**

Select all that apply

- Certification  
 Supplier scorecard or rating  
 Supplier self-assessment

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

Select from:

- 76-99%

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

Select from:

- 76-99%

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

Select from:

None

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

Select from:

None

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

Select from:

Retain and engage

#### **(5.11.6.10) % of non-compliant suppliers engaged**

Select from:

None

#### **(5.11.6.11) Procedures to engage non-compliant suppliers**

Select all that apply

Assessing the efficacy and efforts of non-compliant supplier actions through consistent and quantified metrics

#### **(5.11.6.12) Comment**

*In the supplier selection process, we take into account the availability of Management Systems such as ISO 9001 Quality, ISO 14001 Environment, ISO 45001 OHS, ISO 50001 Energy, Product Responsibility, Diversity and Inclusion, Human Rights criteria. We demand corrective actions from our active suppliers that we determine do not comply with basic environmental criteria. We terminate cooperation with suppliers that we determine to have any negative environmental impact. We evaluated our suppliers in accordance with the Supplier Performance Evaluation according to the evaluation parameters of 'Quality Score', 'Deadline Compliance Score' and 'Receiver Score'. According to the evaluation results, we do not have any suppliers with 'Low Performance' status, and we provided the necessary feedback to our suppliers in the 'Suppliers Requiring Remedial Action' group. We continued to raise awareness of environmental, social and governance factors with our suppliers to help them strengthen their business practices and integrate sustainability into their business processes. In order to identify and monitor these impacts of our suppliers, we implemented the 'Sustainability Supplier Evaluation Survey' in the 2023 activity period.*

## **Water**

#### **(5.11.6.1) Environmental requirement**

Select from:

Other, please specify :Compliance the regulations and Akenerji Sustainability Policy

#### **(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement**

Select all that apply

Supplier scorecard or rating

Supplier self-assessment

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

Select from:

76-99%

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

Select from:

76-99%

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

Select from:

Retain and engage

### **(5.11.6.10) % of non-compliant suppliers engaged**

Select from:

None

### **(5.11.6.11) Procedures to engage non-compliant suppliers**

Select all that apply

Assessing the efficacy and efforts of non-compliant supplier actions through consistent and quantified metrics

### **(5.11.6.12) Comment**

*In the supplier selection process, we take into account the existence of Management Systems such as ISO 9001 Quality, ISO 14001 Environment, ISO 45001 OHS, ISO 50001 Energy, Product Responsibility, Diversity and Inclusion, Human Rights criteria. We demand corrective actions from our active suppliers that we determine do not comply with basic environmental criteria. We terminate cooperation with suppliers that we determine to have any negative environmental impact. Supplier Evaluation We have evaluated our active suppliers in accordance with the Supplier Performance Evaluation according to the evaluation parameters of 'Quality Score', 'Deadline Compliance Score' and 'Receiver Score'. We expect our suppliers to comply with the rules written in the general conditions of procurement, contracts, specifications and other similar documents regulating our business relations with our suppliers, as well as the regulations on business ethics, human rights (no child labour, forced labour, discrimination, inequality, human rights violations, etc.), occupational health and safety and working conditions. We continued to raise awareness of environmental, social and governance factors with our suppliers to help them strengthen their business practices and integrate sustainability into their business processes. In order to identify and monitor these impacts of our suppliers, we implemented the 'Sustainability Supplier Evaluation Survey' in the 2023 operating period.*

[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:

- Adoption of the United Nation's International Labour Organization principles

### (5.11.7.3) Type and details of engagement

#### Capacity building

- Provide training, support and best practices on how to mitigate environmental impact

#### Innovation and collaboration

- Collaborate with suppliers on innovations to reduce environmental impacts in products and services

### (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:

- 76-99%

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

Select from:

- None

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

*We expect our suppliers to comply with the rules written in the general conditions of procurement, contracts, specifications and other similar documents regulating our business relations with our suppliers, as well as the regulations on business ethics, human rights (no child labour, forced labour, discrimination, inequality, human rights violations, etc.), occupational health and safety and working conditions. We continued to raise awareness of environmental, social and governance factors with our suppliers to help them strengthen their business practices and integrate sustainability into their business processes. In order to identify and monitor these impacts of our suppliers, we implemented the 'Sustainability Supplier Evaluation Survey' in the 2023 operating period..*

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

Select from:

- No, this engagement is unrelated to meeting an environmental requirement

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

Select from:

- Unknown

## Water



### **(5.11.7.2) Action driven by supplier engagement**

Select from:

- Adoption of the United Nation's International Labour Organization principles

### **(5.11.7.3) Type and details of engagement**

#### **Capacity building**

- Provide training, support and best practices on how to mitigate environmental impact

#### **Information collection**

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

#### **Innovation and collaboration**

- Collaborate with suppliers on innovations to reduce environmental impacts in products and services

### **(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:

- 76-99%

### **(5.11.7.7) % tier 1 suppliers with substantive impacts and/or dependencies related to this environmental issue covered by engagement**

Select from:

- None

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

*In the supplier selection process, we take into account the existence of Management Systems such as ISO 9001 Quality, ISO 14001 Environment, ISO 45001 OHS, ISO 50001 Energy, Product Responsibility, Diversity and Inclusion, Human Rights criteria. We demand corrective actions from our active suppliers that we determine do not comply with basic environmental criteria. We terminate cooperation with suppliers that we determine to have any negative environmental impact. Supplier Evaluation We have evaluated our active suppliers in accordance with the Supplier Performance Evaluation according to the evaluation parameters of 'Quality Score', 'Deadline Compliance Score' and 'Receiver Score'. We expect our suppliers to comply with the rules written in the general conditions of procurement, contracts, specifications and other similar documents regulating our business relations with our suppliers, as well as the regulations on business ethics, human rights (no child labour, forced labour, discrimination, inequality, human rights violations, etc.), occupational health and safety and working conditions.*

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

Select from:

- No, this engagement is unrelated to meeting an environmental requirement

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

Select from:

Unknown

[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:

Investors and shareholders

#### **(5.11.9.2) Type and details of engagement**

##### **Education/Information sharing**

Educate and work with stakeholders on understanding and measuring exposure to environmental risks

Share information on environmental initiatives, progress and achievements

#### **(5.11.9.3) % of stakeholder type engaged**

Select from:

None

#### **(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**

*Our key stakeholders are the people and organisations that are affected by our activities, that may have an impact on achieving our company's business goals, and with whom we cooperate. In 2022, we analysed our stakeholders through a survey conducted with the participation of 62% of Akenerji executives prior to the preparation of our integrated report and identified our key stakeholders in two groups. We aim to review our material stakeholders every two years starting from 2022 and to improve our communication platforms accordingly. Our company uses a transparent and continuous communication network with stakeholder groups such as shareholders, employees, customers, suppliers, local communities and regulatory bodies. Our communication strategies include reporting, regular meetings, surveys and feedback mechanisms. These processes ensure an open dialogue with stakeholders and a common understanding of sustainability and performance targets...*

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

*Thanks to the regular and open communication network established with stakeholder groups, Akenerji successfully manages both its sustainability performance and strategic targets. Interactions with stakeholders, including shareholders, employees, customers, suppliers, local communities and regulatory bodies, enable the*

Company to better navigate climate-related risks and opportunities. In this context, opinions and suggestions on climate change risks and opportunities are received from stakeholders through regular feedback processes, meetings and surveys, and these feedbacks are integrated into Akenerji's strategic plans. Stakeholders' expectations regarding climate risks and opportunities are presented directly to the Board of Directors and these opinions contribute to the shaping of management decisions.

## 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

- Educate and work with stakeholders on understanding and measuring exposure to environmental risks

### (5.11.9.3) % of stakeholder type engaged

Select from:

- Less than 1%

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

Our key stakeholders are the people and organisations that are affected by our activities, that may have an impact on achieving our company's business goals, and with whom we cooperate. In 2022, we analysed our stakeholders through a survey conducted with the participation of 62% of Akenerji executives prior to the preparation of our integrated report and identified our key stakeholders in two groups. We aim to review our material stakeholders every two years starting from 2022 and to improve our communication platforms accordingly. Our company uses a transparent and continuous communication network with stakeholder groups such as shareholders, employees, customers, suppliers, local communities and regulatory bodies. Our communication strategies include reporting, regular meetings, surveys and feedback mechanisms. These processes ensure an open dialogue with stakeholders and a common understanding of sustainability and performance targets..

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

Thanks to the regular and open communication network established with stakeholder groups, Akenerji successfully manages both its sustainability performance and strategic targets. Interactions with stakeholders, including shareholders, employees, customers, suppliers, local communities and regulatory bodies, enable the Company to better navigate climate-related risks and opportunities. In this context, opinions and suggestions on climate change risks and opportunities are received from stakeholders through regular feedback processes, meetings and surveys, and these feedbacks are integrated into Akenerji's strategic plans. Stakeholders' expectations regarding climate risks and opportunities are presented directly to the Board of Directors and these opinions contribute to the shaping of management decisions.

[Add row]

## C6. Environmental Performance - Consolidation Approach

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

#### Climate change

##### (6.1.1) Consolidation approach used

Select from:

- Operational control

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

*Akenerji has adopted an operational control approach to achieve its carbon emission reduction targets within the scope of combating climate change. In line with the approach we use, we manage our activities effectively by directly controlling our emissions. The biggest output of the approach we have chosen for us is that it is comprehensive in a way that will enable our Company to achieve its climate change strategies and long-term goals. The operational control approach enables Akenerji to monitor and manage its direct impacts on climate change more effectively. In line with carbon emission reduction targets, our power plants strive to minimise their carbon footprint by implementing reduction targets in the operations they directly control. Akenerji's goal of reducing Scope 1&2 carbon emissions by 50% by 2030 compared to 2017 levels is based on reducing carbon intensity in facilities under operational control. In line with this approach, we make plans to encourage the transition to low-carbon energy sources by increasing investments in renewable energy projects. A large portion of our company's carbon emissions arise from energy generation activities. The operational control approach supports us to directly control our carbon emissions and enables us to implement the most effective strategies to reduce our emissions.*

#### Water

##### (6.1.1) Consolidation approach used

Select from:

- Operational control

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

*Our company uses the operational control approach to calculate environmental performance data on water consumption and management. The approach we have chosen focuses on monitoring and managing water use and water efficiency in power plants under the direct operational control of our company. Akenerji operationally monitors all data related to water management at HEPP, WPP and CCGT plants on a plant-specific basis and regularly monitors and controls data on targets and realisations. All plant-specific data facilitates the effective implementation of strategic projects and water recovery programmes aimed at minimising water consumption. Water management has a priority place among Akenerji's environmental sustainability targets. The 2023 water consumption reduction target was successfully achieved and more ambitious targets were set for 2024. The operational control approach provides a directly effective monitoring and control mechanism to achieve these targets. Akenerji uses innovative technologies in water management to optimise water consumption and increase water efficiency. Effective monitoring of water use in all facilities under operational control is critical to ensure sustainable use of resources.*

#### Plastics

## (6.1.1) Consolidation approach used

Select from:

Operational control

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

*Akenerji has adopted an operational control approach to achieve its environmental sustainability targets in the management of plastics. This approach provides the opportunity to monitor and control plastic waste generation and management in all power plants and head offices under the direct operational control of our company. Plastic waste reduction targets have been set in line with our company's strategic environmental sustainability commitments. In order to effectively monitor and manage plastic waste management, Akenerji regularly collects and monitors plastic waste data at all plants under operational control and at the head office. In this process, data on the amount of plastic purchased each year and the amount of plastic waste sent for recycling are also recorded. This data is critical for continuous improvement of environmental performance and achievement of plastic waste reduction targets. In line with the goal of achieving zero plastic waste by 2030, Akenerji aims to reduce the amount of plastic waste at specified rates every year until 2025. These targets require concrete steps to be taken to minimise plastic waste generation in activities carried out under operational control at power plants and head office. In particular, the target to phase out the use of single-use plastics such as plastic cups, straws and bottles will be implemented gradually by 2030. The set target is also in line with the commitments made within the scope of Akkök Holding's Business Plastic Initiative and is integrated with the company's broader sustainability strategies.*

## Biodiversity

### (6.1.1) Consolidation approach used

Select from:

Operational control

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

*Akenerji utilises the operational control approach in the process of assessing and managing its environmental impacts on biodiversity. The Company monitors the impacts of the power plants under its direct control on biodiversity and takes necessary measures to minimise these impacts. In addition, it offers the most appropriate strategy for monitoring and managing plant-based biodiversity risks. The impacts on biodiversity and ecosystem services were assessed for each of our plants and location-based risk temperature maps were created. While this approach allowed us to make facility-based assessments, it also made positive contributions in terms of allocating financial provisions for risky areas, planning actions efficiently and guided our decision-making processes correctly. The protection of biodiversity is recognised as a fundamental element of Akenerji's environmental sustainability strategies. In order to reduce the risks to biodiversity, our Company prioritises its power plants according to the risk status and implements environmental monitoring and protection projects. For example, Ayyıldız WPP, Erzin Natural Gas Combined Cycle Power Plant, Burç HEPP, Feke 1 HEPP, Feke 2 HEPP, Bulam HEPP and Gökkaya HEPP are assessed at very high level in terms of biodiversity risks. Accordingly, a planning calendar has been established for the studies to be carried out within the scope of biodiversity for our facilities in the very high category. Akenerji is able to regularly monitor the impacts of the activities of power plants under operational control on local biodiversity and take proactive measures to manage these impacts. The approach we have chosen makes significant contributions to manage the potential impacts of wind and hydroelectric power plants on bird migration routes and aquatic ecosystems.*

[Fixed row]

## C7. Environmental performance - Climate Change

**(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 <input checked="" type="checkbox"/> No

[Fixed row]

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

	Change(s) in methodology, boundary, and/or reporting year definition?
	Select all that apply <input checked="" type="checkbox"/> No

[Fixed row]

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

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

Select from:

We are reporting a Scope 2, location-based figure

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

Select from:

We have no operations where we are able to access electricity supplier emission factors or residual emissions factors and are unable to report a Scope 2, market-based figure

### (7.3.3) Comment

We use electricity from the grid, other than the electricity we generate. Our current electricity supply agreements do not provide access to specific emission factors. As a result, we are limited to reporting Scope 2 emissions using the location-based method, which relies on grid average emission factors rather than supplier-specific data. [Fixed row]

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

### **Scope 1**

#### **(7.5.1) Base year end**

12/30/2017

#### **(7.5.2) Base year emissions (metric tons CO<sub>2</sub>e)**

1628865

#### **(7.5.3) Methodological details**

The calculation of Scope 1 emissions is conducted in accordance with ISO 14064-1. The primary data for Scope 1 emissions is derived from on-site fuel consumption records, including natural gas, diesel, and other fuels used in Akenerji's power generation plants and company-owned vehicles. Fuel consumption data is recorded and monitored through metering systems and verified through internal audits. Emission Factors: Akenerji uses internationally recognized emission factors, primarily sourced from the Intergovernmental Panel on Climate Change (IPCC) Guidelines and national inventories. For natural gas combustion, emission factors specific to the type of fuel and its carbon content are applied to calculate CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O emissions.

### **Scope 2 (location-based)**

#### **(7.5.1) Base year end**

12/30/2017

#### **(7.5.2) Base year emissions (metric tons CO<sub>2</sub>e)**

6995

#### **(7.5.3) Methodological details**

The calculation of Scope 2 emissions is conducted in accordance with ISO 14064-1. Akenerji's Scope 2 emissions include indirect greenhouse gas emissions resulting from the consumption of purchased electricity, heat, and steam. These emissions occur outside the organization's operational boundary but are a direct consequence of its energy consumption. Akenerji follows the operational control approach to define its organizational boundary for Scope 2 emissions reporting, ensuring that all emissions associated with the electricity used in its operations are included. Data Collection and Calculation: Data Sources: Scope 2 emissions data is primarily based on the electricity consumption records for Akenerji's offices, facilities, and operational sites. Electricity consumption data is collected directly from utility bills, on-site metering systems, and internal energy management systems to ensure accuracy and consistency in reporting.

### **Scope 2 (market-based)**

#### **(7.5.1) Base year end**

12/30/2017



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

0

### (7.5.3) Methodological details

*Not applicable.*

## Scope 3 category 1: Purchased goods and services

### (7.5.1) Base year end

12/30/2017

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

0

### (7.5.3) Methodological details

*Since there was no regulatory requirement at that time, Scope 3 Category 1 emissions were not calculated for 2017.*

## Scope 3 category 2: Capital goods

### (7.5.1) Base year end

12/30/2017

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

0

### (7.5.3) Methodological details

*Not applicable.*

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

### (7.5.1) Base year end

12/30/2017

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

453

### (7.5.3) Methodological details

*We calculated the GHG emissions from the RMS (station used to regulate the pressure of natural gas during NG supply to the Erzin NGCCPP), natural gas for power generation, gasoline and diesel (used for generators, fire pumps, and vehicles).*

## Scope 3 category 4: Upstream transportation and distribution

### **(7.5.1) Base year end**

12/30/2017

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

0

### **(7.5.3) Methodological details**

*Since there was no regulatory requirement at that time, Scope 3 Category 4 emissions were not calculated for 2017.*

## **Scope 3 category 5: Waste generated in operations**

### **(7.5.1) Base year end**

12/30/2017

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

0

### **(7.5.3) Methodological details**

*Since there was no regulatory requirement at that time, Scope 3 Category 5 emissions were not calculated for 2017.*

## **Scope 3 category 6: Business travel**

### **(7.5.1) Base year end**

12/30/2017

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

0

### **(7.5.3) Methodological details**

*Since there was no regulatory requirement at that time, Scope 3 Category 6 emissions were not calculated for 2017.*

## **Scope 3 category 7: Employee commuting**

### **(7.5.1) Base year end**

12/30/2017

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

0

### **(7.5.3) Methodological details**

Since there was no regulatory requirement at that time, Scope 3 Category 7 emissions were not calculated for 2017.

### **Scope 3 category 8: Upstream leased assets**

#### **(7.5.1) Base year end**

12/30/2017

#### **(7.5.2) Base year emissions (metric tons CO<sub>2</sub>e)**

0

#### **(7.5.3) Methodological details**

*Not applicable.*

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

#### **(7.5.1) Base year end**

12/30/2017

#### **(7.5.2) Base year emissions (metric tons CO<sub>2</sub>e)**

0

#### **(7.5.3) Methodological details**

Since there was no regulatory requirement at that time, Scope 3 Category 9 emissions were not calculated for 2017.

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

#### **(7.5.1) Base year end**

12/30/2017

#### **(7.5.2) Base year emissions (metric tons CO<sub>2</sub>e)**

0

#### **(7.5.3) Methodological details**

*Not applicable.*

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

#### **(7.5.1) Base year end**

12/30/2017

#### **(7.5.2) Base year emissions (metric tons CO<sub>2</sub>e)**

0

### **(7.5.3) Methodological details**

*Since there was no regulatory requirement at that time, Scope 3 Category 11 emissions were not calculated for 2017.*

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

### **(7.5.1) Base year end**

12/30/2017

### **(7.5.2) Base year emissions (metric tons CO<sub>2</sub>e)**

0

### **(7.5.3) Methodological details**

*Not applicable.*

## **Scope 3 category 13: Downstream leased assets**

### **(7.5.1) Base year end**

12/30/2017

### **(7.5.2) Base year emissions (metric tons CO<sub>2</sub>e)**

0

### **(7.5.3) Methodological details**

*Not applicable.*

## **Scope 3 category 14: Franchises**

### **(7.5.1) Base year end**

12/30/2017

### **(7.5.2) Base year emissions (metric tons CO<sub>2</sub>e)**

0

### **(7.5.3) Methodological details**

*Not applicable.*

## **Scope 3 category 15: Investments**

### **(7.5.1) Base year end**

12/30/2017

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

0

### (7.5.3) Methodological details

*Not applicable.*

### Scope 3: Other (upstream)

#### (7.5.1) Base year end

12/30/2017

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

0

### (7.5.3) Methodological details

*Not applicable.*

### Scope 3: Other (downstream)

#### (7.5.1) Base year end

12/30/2017

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

0

### (7.5.3) Methodological details

*Not applicable.*

*[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)

1189460.25

#### (7.6.3) Methodological details

*The methodology for calculating Scope 1 emissions for Akenerji is based on ISO 14064-1 and GHG Protocol standards. The emissions primarily arise from natural gas combustion in the Erzin Power Plant's turbines, auxiliary*

boilers, diesel generators, and other fuel-consuming equipment. Emissions factors for each fuel type are derived from international standards, primarily the IPCC guidelines. For natural gas, the emissions factor is calculated based on the gas composition determined by gas chromatographs. For diesel and gasoline, the IPCC 2006 standards are applied. These factors are used to convert fuel consumption into CO<sub>2</sub>-equivalent emissions. Inputs: Natural Gas: Daily consumption data from the plant's systems, verified against BOTAŞ reports. Diesel: Hours of operation for generators and fire pumps, and fuel consumption data from vehicle tracking systems. Refrigerants and other gases: Purchase and usage records for the year. Assumptions: Oxidation factors are assumed to be 1, meaning complete combustion of the fuels. Emissions from natural gas combustion are based on the specific carbon content of the gas as measured in 2023. The calorific values for natural gas and diesel are based on the average values obtained from plant measurements.

## Past year 1

### (7.6.1) Gross global Scope 1 emissions (metric tons CO<sub>2</sub>e)

1143801

### (7.6.2) End date

12/30/2022

### (7.6.3) Methodological details

*Measurement Approach: Akenerji uses multiple sources of emissions to calculate Scope 1 emissions according to ISO14064-1. The key contributors include: Natural Gas Combustion: Our primary emission source is the combustion of natural gas in gas turbines and auxiliary boilers for electricity generation. Diesel Generators and Fire Pumps: Diesel consumption in generators and fire pumps is recorded based on operational hours and fuel usage data. Company Vehicles: Diesel and gasoline used in company vehicles are tracked using a vehicle management system. Other Gases: Emissions from the use of gases such as R410A in air conditioning units, CO<sub>2</sub> in fire extinguishers, and acetylene for welding are calculated based on purchase records. Emissions Factors: Natural Gas: Emission factors for natural gas are calculated using data from gas chromatographs that analyze the carbon content of the fuel used in 2022. The emissions factors used are: CO<sub>2</sub>: 55.918709 tCO<sub>2</sub>/TJ CH<sub>4</sub>: 1 kgCO<sub>2</sub>/TJ N<sub>2</sub>O: 0.1 kgCO<sub>2</sub>/TJ Diesel and Gasoline for Vehicles: Diesel CO<sub>2</sub> factor: 74.100 kgCO<sub>2</sub>/TJ Gasoline CO<sub>2</sub> factor: 69.300 kgCO<sub>2</sub>/TJ Other gases like CH<sub>4</sub> and N<sub>2</sub>O are factored in using IPCC data. Inputs: Natural Gas: Daily consumption data are gathered from plant systems and verified against gas supplier reports. Data are collected, stored electronically, and cross-checked for accuracy. Diesel and Gasoline: Data are gathered from the vehicle management system and operational logs for generators and fire pumps. Refrigerants and Other Gases: Purchase records are used to determine the quantities of refrigerants and other gases consumed during the year. Assumptions: Oxidation Factor: The oxidation factor for fuel combustion is assumed to be 1, meaning complete combustion. Calorific Values: The lower calorific value (LHV) for natural gas is based on the average value of 47.708274 Tj/Gg from the gas measurement station. Rationale for Choices: Use of Actual Data: The measurement approach relies on actual fuel consumption data, ensuring precision. This is crucial for tracking direct emissions and aligning with international standards. Emission Factors: IPCC guidelines are followed to maintain consistency with global reporting practices. This allows Akenerji to compare its performance against industry benchmarks.*

## Past year 2

### (7.6.1) Gross global Scope 1 emissions (metric tons CO<sub>2</sub>e)

1560466

### (7.6.2) End date

12/30/2021

### **(7.6.3) Methodological details**

*Akenerji's Scope 1 emissions for 2021 were primarily calculated from the combustion of natural gas in the gas turbines and auxiliary boilers at the Erzin Natural Gas Combined Cycle Power Plant. The following key activities contributed to Scope 1 emissions: Natural Gas Combustion: The primary source of emissions comes from the consumption of natural gas in turbines. Daily consumption data is tracked using the RMS control system and verified against BOTAŞ/Aksa Çukurova natural gas reports. Diesel Generators and Fire Pumps: Diesel fuel is used in the emergency generators and fire pumps. Diesel consumption data is calculated based on operational hours and the technical specifications of fuel consumption rates. Company Vehicles: The fuel consumption (diesel and gasoline) of company vehicles is tracked using a vehicle management system, which logs consumption by vehicle. Other Gases: The use of gases such as R410A (used in air conditioning units), CO<sub>2</sub> (in fire extinguishers), and acetylene for welding contributes to emissions. These gases are calculated based on purchase records and usage within the reporting year. Emission Factors: Natural Gas: Emission factors are calculated based on gas composition obtained from gas chromatograph measurements. CO<sub>2</sub>: 55.918709 tCO<sub>2</sub>/TJ CH<sub>4</sub>: 1 kgCO<sub>2</sub>/TJ N<sub>2</sub>O: 0.1 kgCO<sub>2</sub>/TJ Diesel and Gasoline: Diesel CO<sub>2</sub> Factor: 74.100 kgCO<sub>2</sub>/TJ (IPCC 2006 standards) Gasoline CO<sub>2</sub> Factor: 69.300 kgCO<sub>2</sub>/TJ Other GHGs (CH<sub>4</sub> and N<sub>2</sub>O): Calculated using IPCC 2006 guidelines. Inputs: Natural Gas: Daily and monthly natural gas consumption data are collected via the PI system and verified against reports from our gas suppliers (BOTAŞ). The gas volume and calorific values are used to calculate total emissions. Diesel and Gasoline: Consumption data for vehicles and generators are recorded and logged based on operational hours and vehicle use. Refrigerants and Other Gases: Emissions from refrigerants and other gases are calculated based on purchase records from the year. Assumptions: Oxidation Factor: The oxidation factor for natural gas combustion is assumed to be 1, meaning complete combustion is achieved. Natural Gas Calorific Value: The lower calorific value for natural gas in 2021 is based on the average value of 47.226671 Tj/Gg obtained from the gas measurement station. Emission Factors: The emission factors for natural gas and other fuels are derived from IPCC 2006 standards, ensuring consistency with international reporting practices.*

[Fixed row]

## **(7.7) What were your organization's gross global Scope 2 emissions in metric tons CO<sub>2</sub>e?**

### **Reporting year**

#### **(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO<sub>2</sub>e)**

9713.51

#### **(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO<sub>2</sub>e) (if applicable)**

9713.51

### **(7.7.4) Methodological details**

*In 2023, Akenerji calculated Scope 2 emissions based on the electricity purchased from the grid in line with both ISO14064-1 and the GHG Protocol. The amount of electricity purchased was measured using the TEİAŞ meters at the plant's substation, and the consumption data was cross-verified with reports from EPIAŞ (Energy Market Regulatory Authority). The data included hourly consumption values, which were aggregated into daily and monthly reports. Emission Factors: The emission factors used to calculate Scope 2 emissions were sourced from the International Energy Agency (IEA) 2020 data. The factors applied were: CO<sub>2</sub>: 0.4313 kg/kWh N<sub>2</sub>O: 0.002 kg/kWh CH<sub>4</sub>: 0.0001 kg/kWh Inputs: The total electricity purchased from the grid in 2023 is 20,296,896 kWh. The total electricity consumption was recorded at 3,301,555,642 kWh, with internal consumption. Rationale for Choices: The use of IEA 2020 emission factors provides a reliable and internationally accepted standard for calculating emissions related to electricity consumption. This ensures consistency across reporting periods and allows for comparability with other companies. By using actual metered data for electricity consumption and cross-*



verifying it with official EPIAŞ reports, Akenerji ensures accurate and transparent reporting of its Scope 2 emissions

## Past year 1

### (7.7.1) Gross global Scope 2, location-based emissions (metric tons CO<sub>2</sub>e)

9675

### (7.7.2) Gross global Scope 2, market-based emissions (metric tons CO<sub>2</sub>e) (if applicable)

9675

### (7.7.3) End date

12/30/2022

### (7.7.4) Methodological details

*In 2022, Scope 2 emissions for Akenerji were calculated based on the electricity purchased from the grid. The total electricity consumption was recorded using metering systems at the substation. The data was further verified against monthly reports from the Energy Market Regulatory Authority (EPIAŞ). Emissions Factors: The emission factors used to calculate Scope 2 emissions in 2022 were: CO<sub>2</sub>: 0.4313 kgCO<sub>2</sub>/kWh N<sub>2</sub>O: 0.002 kg/kWh CH<sub>4</sub>: 0.0001 kg/kWh These emission factors were derived from the International Energy Agency 2020 data. Inputs: In 2022, the electricity purchased from the grid is 19,858,873 kWh. It was recorded and verified through metering systems and EPIAŞ reports. Rationale for Choices: The IEA EFs provide a reliable and widely accepted standard for calculating electricity-related emissions. By employing verified electricity consumption data from the plants' systems and cross-checking with EPIAŞ reports, Akenerji ensures a high level of accuracy in reporting its Scope 2 emissions.*

## Past year 2

### (7.7.1) Gross global Scope 2, location-based emissions (metric tons CO<sub>2</sub>e)

6548

### (7.7.2) Gross global Scope 2, market-based emissions (metric tons CO<sub>2</sub>e) (if applicable)

6548

### (7.7.3) End date

12/30/2021

### (7.7.4) Methodological details

*In 2021, Akenerji's Scope 2 emissions were generated from electricity purchased from the grid. The electricity purchased was tracked using meters and the consumption data was cross-referenced with EPIAŞ reports for accuracy. Emissions Factors: For calculating the emissions related to purchased electricity, the emission factor for CO<sub>2</sub> is used as 0.4313 kgCO<sub>2</sub>/kWh, based on IEA 2020 data. Inputs: The total electricity purchased from the grid in 2021 was 10,485,610 kWh. This data was obtained from the plant's meters and cross-referenced with the EPIAŞ. Rationale: The emission factor from IEA ensures alignment with internationally recognized standards, allowing for comparability across reports and other entities.*

[Fixed row]

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

### **Purchased goods and services**

#### **(7.8.1) Evaluation status**

Select from:

Relevant, calculated

#### **(7.8.2) Emissions in reporting year (metric tons CO<sub>2</sub>e)**

0.11

#### **(7.8.3) Emissions calculation methodology**

Select all that apply

Supplier-specific method

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

100

#### **(7.8.5) Please explain**

*In 2023, emissions from purchased goods and services are calculated based on materials required for plant operations and maintenance. The emission factors used are sourced from Defra for different material categories, and emissions are calculated based on the volume of goods procured during the year. While the calculation follows the principles of ISO 14064-1, which provides a general framework for greenhouse gas inventory and reporting, the detailed categorization of Scope 3 emissions aligns with the GHG Protocol as well. We have also ensured that the calculation adheres to the GHG Protocol methodology for sub-categories of Scope 3 emissions.*

### **Capital goods**

#### **(7.8.1) Evaluation status**

Select from:

Not relevant, explanation provided

#### **(7.8.5) Please explain**

*In 2023, Akenerji did not engage in the production or significant purchase of capital goods that would lead to substantial emissions. The company’s operations primarily focused on electricity generation. Therefore, this category is not relevant.*

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

#### **(7.8.1) Evaluation status**

Select from:

Relevant, calculated

## (7.8.2) Emissions in reporting year (metric tons CO<sub>2</sub>e)

186992.18

## (7.8.3) Emissions calculation methodology

Select all that apply

- Spend-based method
- Fuel-based method
- Site-specific method

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

100

## (7.8.5) Please explain

Akenerji calculated these emissions using well-to-tank (WTT) data for fuels like natural gas, diesel, and gasoline. The emission factors are provided by Defra 2023. Emissions are calculated by multiplying the activity data (fuel consumption) with the corresponding emission factors. While the calculation follows the principles of ISO 14064-1, which provides a general framework for greenhouse gas inventory and reporting, the detailed categorization of Scope 3 emissions aligns with the GHG Protocol as well. We have also ensured that the calculation adheres to the GHG Protocol methodology for sub-categories of Scope 3 emissions.

## Upstream transportation and distribution

### (7.8.1) Evaluation status

Select from:

- Not relevant, explanation provided

### (7.8.5) Please explain

In 2023, Akenerji's business model continues to focus on power generation, with no significant upstream transportation and distribution of raw materials. The natural gas used in power plants was delivered directly through pipelines, and wind and hydro resources did not require transportation. As such, emissions from upstream transportation and distribution are not relevant.

## Waste generated in operations

### (7.8.1) Evaluation status

Select from:

- Relevant, calculated

## (7.8.2) Emissions in reporting year (metric tons CO<sub>2</sub>e)

2.54

## (7.8.3) Emissions calculation methodology

Select all that apply

- Supplier-specific method
- Waste-type-specific method

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

100

#### (7.8.5) Please explain

*Emissions from waste are calculated using data on the type and quantity of waste generated, along with the disposal methods. The emission factors for waste generated in operations are sourced from Defra 2023. Emissions were determined by multiplying the activity data (waste generated) with the appropriate emission factors. While the calculation follows the principles of ISO 14064-1, which provides a general framework for greenhouse gas inventory and reporting, the detailed categorization of Scope 3 emissions aligns with the GHG Protocol as well. We have also ensured that the calculation adheres to the GHG Protocol methodology for sub-categories of Scope 3 emissions.*

### Business travel

#### (7.8.1) Evaluation status

Select from:

- Relevant, calculated

#### (7.8.2) Emissions in reporting year (metric tons CO<sub>2</sub>e)

11.07

#### (7.8.3) Emissions calculation methodology

Select all that apply

- Fuel-based method
- Distance-based method

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

0

#### (7.8.5) Please explain

*For 2023, emissions from business travel are calculated by multiplying the activity data (distance traveled) with the respective emission factors. The emission factors for air travel were obtained from Defra 2023, with the emissions calculated based on the distance traveled in kilometers and the type of travel. While the calculation follows the principles of ISO 14064-1, which provides a general framework for greenhouse gas inventory and reporting, the detailed categorization of Scope 3 emissions aligns with the GHG Protocol as well. We have also ensured that the calculation adheres to the GHG Protocol methodology for sub-categories of Scope 3 emissions.*

### Employee commuting

#### (7.8.1) Evaluation status

Select from:

- Relevant, calculated

## (7.8.2) Emissions in reporting year (metric tons CO<sub>2</sub>e)

48.1

## (7.8.3) Emissions calculation methodology

Select all that apply

- Average data method
- Fuel-based method
- Distance-based method

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

0

## (7.8.5) Please explain

*Emissions from employee commuting are calculated by multiplying the activity data (commuting distances) with the corresponding emission factors. While the calculation follows the principles of ISO 14064-1, which provides a general framework for greenhouse gas inventory and reporting, the detailed categorization of Scope 3 emissions aligns with the GHG Protocol as well. We have also ensured that the calculation adheres to the GHG Protocol methodology for sub-categories of Scope 3 emissions.*

## Upstream leased assets

### (7.8.1) Evaluation status

Select from:

- Not relevant, explanation provided

### (7.8.5) Please explain

*In 2023, Akenerji owned and operated its power generation facilities, meaning there were no leased assets involved in upstream operations. The absence of leased assets rendered this category not relevant.*

## Downstream transportation and distribution

### (7.8.1) Evaluation status

Select from:

- Relevant, calculated

## (7.8.2) Emissions in reporting year (metric tons CO<sub>2</sub>e)

242.83

## (7.8.3) Emissions calculation methodology

Select all that apply

- Average data method
- Fuel-based method
- Distance-based method

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

100

#### (7.8.5) Please explain

*In 2023, emissions from downstream transportation and distribution are calculated by multiplying the activity data with the relevant emission factors. While the calculation follows the principles of ISO 14064-1, which provides a general framework for greenhouse gas inventory and reporting, the detailed categorization of Scope 3 emissions aligns with the GHG Protocol as well. We have also ensured that the calculation adheres to the GHG Protocol methodology for sub-categories of Scope 3 emissions.*

### Processing of sold products

#### (7.8.1) Evaluation status

Select from:

- Not relevant, explanation provided

#### (7.8.5) Please explain

*Akenerji's core business involves electricity generation, which is sold directly to the grid without further physical processing. As a result, this category is not applicable to the company's operations.*

### Use of sold products

#### (7.8.1) Evaluation status

Select from:

- Relevant, calculated

#### (7.8.2) Emissions in reporting year (metric tons CO<sub>2</sub>e)

1189347.54

#### (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

0

#### (7.8.5) Please explain

For 2023, Akenerji delivered 3,528,597,389 kWh of electricity to TEİAŞ. Emissions are determined by multiplying the activity data with the relevant emission factor. While the calculation follows the principles of ISO 14064-1, which provides a general framework for greenhouse gas inventory and reporting, the detailed categorization of Scope 3 emissions aligns with the GHG Protocol as well. We have also ensured that the calculation adheres to the GHG Protocol methodology for sub-categories of Scope 3 emissions.

## End of life treatment of sold products

### (7.8.1) Evaluation status

Select from:

Not relevant, explanation provided

### (7.8.5) Please explain

Since Akenerji produces electricity, which does not require any physical disposal or end-of-life treatment, this category is not relevant to its scope 3 emissions.

## Downstream leased assets

### (7.8.1) Evaluation status

Select from:

Not relevant, explanation provided

### (7.8.5) Please explain

In 2023, Akenerji did not lease assets downstream, such as facilities or infrastructure for electricity distribution. The electricity generated was sold directly to the national grid, making this category not relevant.

## Franchises

### (7.8.1) Evaluation status

Select from:

Not relevant, explanation provided

### (7.8.5) Please explain

In 2023, Akenerji did not operate under a franchise model. All its operations were managed directly by the company, making this category not relevant.

## Investments

### (7.8.1) Evaluation status

Select from:

Not relevant, explanation provided

### (7.8.5) Please explain



*In 2023, Akenerji did not engage in significant financial investments that would necessitate reporting emissions from such activities under scope 3. The company's focus remained on operational emissions, and therefore this category was not relevant.*

## **Other (upstream)**

### **(7.8.1) Evaluation status**

Select from:

Not relevant, explanation provided

### **(7.8.5) Please explain**

*Akenerji had no other significant upstream activities in 2023 that would contribute to scope 3 emissions outside of the categories already considered. This category was not relevant.*

## **Other (downstream)**

### **(7.8.1) Evaluation status**

Select from:

Not relevant, explanation provided

### **(7.8.5) Please explain**

*In 2023, Akenerji did not have additional downstream activities beyond those associated with the sale of electricity, which were already captured in other scope 3 categories. Therefore, this category was not relevant. [Fixed row]*

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

### **Past year 1**

#### **(7.8.1.1) End date**

12/30/2022

#### **(7.8.1.2) Scope 3: Purchased goods and services (metric tons CO<sub>2</sub>e)**

0.1

#### **(7.8.1.3) Scope 3: Capital goods (metric tons CO<sub>2</sub>e)**

0

#### **(7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO<sub>2</sub>e)**

189471.63

#### **(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO<sub>2</sub>e)**

0

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

2.76

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

11.6

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

56.89

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

0

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

200.51

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

0

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

911055.69

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

0

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

0

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

0

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

0

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

0

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

0

## **(7.8.1.19) Comment**

*For the 2022 Scope 3 subcategories, we used the same calculation approaches applied in 2023, ensuring consistency in our methodology across both years.*

## **Past year 2**

### **(7.8.1.1) End date**

12/30/2021

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

0.11

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

0

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

253640.61

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

0

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

1.79

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

0

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

56.89

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

0

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

300.48

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

0

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

**(7.8.1.13) Scope 3: End of life treatment of sold products (metric tons CO<sub>2</sub>e)**

0

**(7.8.1.14) Scope 3: Downstream leased assets (metric tons CO<sub>2</sub>e)**

0

**(7.8.1.15) Scope 3: Franchises (metric tons CO<sub>2</sub>e)**

0

**(7.8.1.16) Scope 3: Investments (metric tons CO<sub>2</sub>e)**

0

**(7.8.1.17) Scope 3: Other (upstream) (metric tons CO<sub>2</sub>e)**

0

**(7.8.1.18) Scope 3: Other (downstream) (metric tons CO<sub>2</sub>e)**

0

**(7.8.1.19) Comment**

*For the 2021 Scope 3 subcategories, we used the same calculation approaches applied in 2023, ensuring consistency in our methodology across both years.*

*[Fixed row]*

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

	Verification/assurance status
Scope 1	Select from: <input checked="" type="checkbox"/> Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	Select from: <input checked="" type="checkbox"/> Third-party verification or assurance process in place
Scope 3	Select from: <input checked="" type="checkbox"/> 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:

Reasonable assurance

### (7.9.1.4) Attach the statement

*GHG Verification Statement (GHG Protocol and 14064-3)\_2023.pdf*

### (7.9.1.5) Page/section reference

*On page 1, 2 and 8 it can be seen that a third party verified Akenerji Erzin Natural Gas Combined Cycle Power Plant's Scope 1 emissions. GHG Protocol and ISO 14064-3 verification reports have been attached.*

### (7.9.1.6) Relevant standard

Select from:

ISO14064-3

### (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:

- Reasonable assurance

### (7.9.2.5) Attach the statement

*GHG Verification Statement (GHG Protocol and 14064-3)\_2023.pdf*

### (7.9.2.6) Page/ section reference

*On page 1, 2 and 8, it can be seen that a third party verified Akenerji Erzin Natural Gas Combined Cycle Power Plant's Scope 2 emissions. GHG Protocol and ISO 14064.-3 verification reports have been attached.*

### (7.9.2.7) Relevant standard

Select from:

- ISO14064-3

### (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

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Scope 3: Business travel transportation and distribution                       | <input checked="" type="checkbox"/> Scope 3: Downstream       |
| <input checked="" type="checkbox"/> Scope 3: Employee commuting related activities (not included in Scopes 1 or 2) | <input checked="" type="checkbox"/> Scope 3: Fuel and energy- |
| <input checked="" type="checkbox"/> Scope 3: Use of sold products  |   |
| <input checked="" type="checkbox"/> Scope 3: Purchased goods and services  |   |
| <input checked="" type="checkbox"/> Scope 3: Waste generated in operations   |   |

#### (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

*GHG Verification Statement (GHG Protocol and 14064-3)\_2023.pdf*

### (7.9.3.6) Page/section reference

*On page 1, 2 and 8, it can be seen that a third party verified Akenerji Erzin Natural Gas Combined Cycle Power Plant's Scope 3 emissions. GHG Protocol and ISO 14064.-3 verification reports have been attached.*

### (7.9.3.7) Relevant standard

Select from:

ISO14064-3

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

100

[Add row]

**(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 CO<sub>2</sub>e)

16646.68

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

Select from:

Decreased

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

1.84

#### (7.10.1.4) Please explain calculation



In 2023, the consumption of renewable electricity for internal use slightly decreased from 2,203.7 MWh in 2022 to 2,197.15 MWh. Therefore, change in renewable energy consumption related emissions are decreased due to less electricity consumption for internal use.

## Other emissions reduction activities

### (7.10.1.1) Change in emissions (metric tons CO<sub>2</sub>e)

45697.76

### (7.10.1.2) Direction of change in emissions

Select from:

Increased

### (7.10.1.3) Emissions value (percentage)

4

### (7.10.1.4) Please explain calculation

In 2023, Akenerji's gross energy production reached 4,202.45 GWh, compared to 3,904.59 GWh in 2022, reflecting a significant increase in energy generation. Despite this rise in production, Akenerji successfully achieved a 3.41% reduction in terms of Scope 1-2 emissions intensity based on electricity generation (2022: 295.42 tCO<sub>2</sub>e/GWh, 2023: 285.35 tCO<sub>2</sub>e/GWh).

## Divestment

### (7.10.1.1) Change in emissions (metric tons CO<sub>2</sub>e)

0

### (7.10.1.2) Direction of change in emissions

Select from:

No change

### (7.10.1.3) Emissions value (percentage)

0

### (7.10.1.4) Please explain calculation

There is no divestment in the reporting year.

## Acquisitions

### (7.10.1.1) Change in emissions (metric tons CO<sub>2</sub>e)

0

### (7.10.1.2) Direction of change in emissions

Select from:

No change

### (7.10.1.3) Emissions value (percentage)

0

### (7.10.1.4) Please explain calculation

*There is acquisitions in the reporting year.*

## Mergers

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

0

### (7.10.1.2) Direction of change in emissions

Select from:

No change

### (7.10.1.3) Emissions value (percentage)

0

### (7.10.1.4) Please explain calculation

*There is no mergers in the reporting year.*

## Change in output

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

45697.76

### (7.10.1.2) Direction of change in emissions

Select from:

Increased

### (7.10.1.3) Emissions value (percentage)

4

### (7.10.1.4) Please explain calculation

*In 2023, gross electricity generation increased to 4,202.45 GWh, up from 3,904.59 GWh in 2022, representing a 7% increase. Despite this rise, Akenerji successfully achieved a 3.41% reduction in terms of Scope 1-2 emissions intensity based on electricity generation (2022: 295.42 tCO2e/GWh, 2023: 285.35 tCO2e/GWh).*

## Change in methodology

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

0

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

Select from:

No change

**(7.10.1.3) Emissions value (percentage)**

0

**(7.10.1.4) Please explain calculation**

*There is no change in our calculation methodology (ISO14064-1).*

**Change in boundary**

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

0

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

Select from:

No change

**(7.10.1.3) Emissions value (percentage)**

0

**(7.10.1.4) Please explain calculation**

*There is no change in our boundary.*

**Change in physical operating conditions**

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

0

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

Select from:

No change

**(7.10.1.3) Emissions value (percentage)**

0

**(7.10.1.4) Please explain calculation**

*There is no change in physical operating conditions for our gross global emissions (Scope 1 and 2 combined).*

## **Unidentified**

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

0

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

Select from:

No change

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

0

### **(7.10.1.4) Please explain calculation**

*There is no unidentified reason for change in our gross global emissions (Scope 1 and 2 combined).*

## **Other**

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

0

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

Select from:

No change

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

0

### **(7.10.1.4) Please explain calculation**

*There is no other reason for change in our global emissions (Scope 1 and 2 combined.)*

*[Fixed row]*

## **(7.15.1) Break down your total gross global Scope 1 emissions by greenhouse gas type and provide the source of each used global warming potential (GWP).**

### **Row 1**

#### **(7.15.1.1) Greenhouse gas**

Select from:

CO2

### (7.15.1.2) Scope 1 emissions (metric tons of CO2e)

1188263.55

### (7.15.1.3) GWP Reference

Select from:

IPCC Sixth Assessment Report (AR6 - 100 year)

### Row 2

### (7.15.1.1) Greenhouse gas

Select from:

CH4

### (7.15.1.2) Scope 1 emissions (metric tons of CO2e)

599

### (7.15.1.3) GWP Reference

Select from:

IPCC Sixth Assessment Report (AR6 - 100 year)

### Row 3

### (7.15.1.1) Greenhouse gas

Select from:

N2O

### (7.15.1.2) Scope 1 emissions (metric tons of CO2e)

597.7

### (7.15.1.3) GWP Reference

Select from:

IPCC Sixth Assessment Report (AR6 - 100 year)

[Add row]

## (7.15.3) Break down your total gross global Scope 1 emissions from electric utilities value chain activities by greenhouse gas type.

### Fugitives

### (7.15.3.1) Gross Scope 1 CO2 emissions (metric tons CO2)

0

**(7.15.3.2) Gross Scope 1 methane emissions (metric tons CH4)**

0

**(7.15.3.3) Gross Scope 1 SF6 emissions (metric tons SF6)**

0

**(7.15.3.4) Total gross Scope 1 emissions (metric tons CO2e)**

0

**(7.15.3.5) Comment**

*There are no emissions from fugitives recorded in 2023. Therefore, the emissions reported for this category amount to zero for the year.*

**Combustion (Electric utilities)**

**(7.15.3.1) Gross Scope 1 CO2 emissions (metric tons CO2)**

0

**(7.15.3.2) Gross Scope 1 methane emissions (metric tons CH4)**

0

**(7.15.3.3) Gross Scope 1 SF6 emissions (metric tons SF6)**

0

**(7.15.3.4) Total gross Scope 1 emissions (metric tons CO2e)**

0

**(7.15.3.5) Comment**

*In 2023, there are no electric utilities involved combustion processes during the reporting period. Therefore, the emissions for this category are reported as zero.*

**Combustion (Gas utilities)**

**(7.15.3.1) Gross Scope 1 CO2 emissions (metric tons CO2)**

1188016.1

**(7.15.3.2) Gross Scope 1 methane emissions (metric tons CH4)**

592.84

**(7.15.3.3) Gross Scope 1 SF6 emissions (metric tons SF6)**

0

#### **(7.15.3.4) Total gross Scope 1 emissions (metric tons CO2e)**

1189189.03

#### **(7.15.3.5) Comment**

*The emissions from the combustion of natural gas in Gas Turbine-1, Gas Turbine-2, and the auxiliary boiler include CO2 and CH4, as well as 580.09 tCO2e of N2O emissions. In total, these emissions amount to 1,189,189.03 tCO2e, reflecting the Scope 1 emissions produced through the combustion of natural gas.*

#### **Combustion (Other)**

#### **(7.15.3.1) Gross Scope 1 CO2 emissions (metric tons CO2)**

319.06

#### **(7.15.3.2) Gross Scope 1 methane emissions (metric tons CH4)**

11.25

#### **(7.15.3.3) Gross Scope 1 SF6 emissions (metric tons SF6)**

0

#### **(7.15.3.4) Total gross Scope 1 emissions (metric tons CO2e)**

0

#### **(7.15.3.5) Comment**

*Other combustion activities include diesel and gasoline consumption for our power plants. The total gross Scope 1 GHG emissions also account for N2O, amounting to 33.33 tCO2e.*

#### **Emissions not elsewhere classified**

#### **(7.15.3.1) Gross Scope 1 CO2 emissions (metric tons CO2)**

54.51

#### **(7.15.3.2) Gross Scope 1 methane emissions (metric tons CH4)**

0

#### **(7.15.3.3) Gross Scope 1 SF6 emissions (metric tons SF6)**

0

#### **(7.15.3.4) Total gross Scope 1 emissions (metric tons CO2e)**

54.51

#### **(7.15.3.5) Comment**



Emissions not elsewhere classified include non-combustion emissions. These are primarily from CO2 used for H2 disposal in generators and R410A refrigerant gases from air conditioning systems, amounting to 54.51 tCO2e.  
 [Fixed row]

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

	Scope 1 emissions (metric tons CO2e)
Turkey	1199173.76

[Fixed row]

**(7.17.2) Break down your total gross global Scope 1 emissions by business facility.**

**Row 2**

**(7.17.2.1) Facility**

*Uluabat HEPP*

**(7.17.2.3) Latitude**

40.0

**(7.17.2.4) Longitude**

28.0

**Row 3**

**(7.17.2.1) Facility**

*Burç HEPP*

**(7.17.2.3) Latitude**

38.0

**(7.17.2.4) Longitude**

38.0

**Row 4**

**(7.17.2.1) Facility**

*Ayyıldız WPP*

**(7.17.2.3) Latitude**

40.0

**(7.17.2.4) Longitude**

27.0

**Row 5**

**(7.17.2.1) Facility**

*Feke 1 HEPP*

**(7.17.2.3) Latitude**

37.0

**(7.17.2.4) Longitude**

35.0

**Row 6**

**(7.17.2.1) Facility**

*Gökkaya HEPP*

**(7.17.2.3) Latitude**

37.0

**(7.17.2.4) Longitude**

36.0

**Row 7**

**(7.17.2.1) Facility**

*Feke 2 HEPP*

**(7.17.2.3) Latitude**

37.0

**(7.17.2.4) Longitude**

35.0

**Row 8**

**(7.17.2.1) Facility**

*Himmetli HEPP*

**(7.17.2.3) Latitude**

37.0

**(7.17.2.4) Longitude**

35.0

**Row 9**

**(7.17.2.1) Facility**

*Bulam HEPP*

**(7.17.2.3) Latitude**

43.0

**(7.17.2.4) Longitude**

42.0

**Row 10**

**(7.17.2.1) Facility**

*Erzin NGCCPP*

**(7.17.2.3) Latitude**

36.0

**(7.17.2.4) Longitude**

36.0

**Row 11**

**(7.17.2.1) Facility**

*Akhan Head Office*

**(7.17.2.3) Latitude**

41.0

**(7.17.2.4) Longitude**

28.0

*[Add row]*

**(7.17.3) Break down your total gross global Scope 1 emissions by business activity.**

	Activity	Scope 1 emissions (metric tons CO2e)
Row 1	Combustion at Power Plants (Stationary)	1189246.72
Row 2	Combustion at offices	0
Row 3	Vehicle-based combustion (Mobile)	159.02
Row 4	Fugitive gases	0

[Add row]

**(7.19) Break down your organization’s total gross global Scope 1 emissions by sector production activity in metric tons CO2e.**

**Electric utility activities**

**(7.19.1) Gross Scope 1 emissions, metric tons CO2e**

1189347.54

**(7.19.3) Comment**

*Our total gross global Scope 1 emissions from electric utility activities amount to 1,189,347.54 tCO2e, which primarily originates from the Erzin natural gas combined cycle power plant.*

[Fixed row]

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

**Consolidated accounting group**

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

1189460.25

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

9713.51

**(7.22.4) Please explain**

*For Scope 1 and Scope 2 emissions, we report only Akenerji's own emissions because Akenerji operates as a standalone entity without any other companies in its consolidated accounting group. As there are no associates, the emissions data solely reflects Akenerji's direct operational activities.*

**All other entities**

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

0

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

0

**(7.22.4) Please explain**

*Akenerji does not have any other entities.*

*[Fixed row]*

**(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: <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired electricity	Select from: <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired heat	Select from: <input checked="" type="checkbox"/> No
Consumption of purchased or acquired steam	Select from: <input checked="" type="checkbox"/> No
Consumption of purchased or acquired cooling	Select from: <input checked="" type="checkbox"/> No
Generation of electricity, heat, steam, or cooling	Select from: <input checked="" type="checkbox"/> 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**

176502.89

#### **(7.30.1.4) Total (renewable and non-renewable) MWh**

176502.89

### **Consumption of purchased or acquired electricity**

#### **(7.30.1.1) Heating value**

Select from:

LHV (lower heating value)

#### **(7.30.1.2) MWh from renewable sources**

1225.42

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

199825.42

#### **(7.30.1.4) Total (renewable and non-renewable) MWh**

201092.87

### **Consumption of self-generated non-fuel renewable energy**

#### **(7.30.1.1) Heating value**

Select from:

LHV (lower heating value)

#### **(7.30.1.2) MWh from renewable sources**

900893.97

#### **(7.30.1.4) Total (renewable and non-renewable) MWh**

900893.97

### **Total energy consumption**

#### **(7.30.1.1) Heating value**

Select from:

LHV (lower heating value)

#### **(7.30.1.2) MWh from renewable sources**

1225.42

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

**(7.30.1.4) Total (renewable and non-renewable) MWh**

201092.87

*[Fixed row]***(7.30.6) Select the applications of your organization's consumption of fuel.**

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	Select from: <input checked="" type="checkbox"/> Yes
Consumption of fuel for the generation of heat	Select from: <input checked="" type="checkbox"/> No
Consumption of fuel for the generation of steam	Select from: <input checked="" type="checkbox"/> No
Consumption of fuel for the generation of cooling	Select from: <input checked="" type="checkbox"/> No
Consumption of fuel for co-generation or tri-generation	Select from: <input checked="" type="checkbox"/> No

*[Fixed row]***(7.30.7) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.****Sustainable biomass****(7.30.7.8) Comment***Not applicable.***Other biomass****(7.30.7.8) Comment***Not applicable.***Other renewable fuels (e.g. renewable hydrogen)****(7.30.7.8) Comment***Not applicable.*



## Coal

### (7.30.7.8) Comment

*Not applicable.*

## Oil

### (7.30.7.1) Heating value

Select from:

LHV

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

597.89

### (7.30.7.3) MWh fuel consumed for self-generation of electricity

67.65

### (7.30.7.4) MWh fuel consumed for self-generation of heat

0

### (7.30.7.8) Comment

*The calculation includes the fuel consumption of vehicles used for transportation as well as the diesel fuel consumption of diesel generators.*

## Gas

### (7.30.7.1) Heating value

Select from:

LHV

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

174598.25

### (7.30.7.3) MWh fuel consumed for self-generation of electricity

174598.25

### (7.30.7.4) MWh fuel consumed for self-generation of heat

0

### (7.30.7.8) Comment

*The amount of natural gas used for internal consumption at the Erzin facility has been considered.*

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

### (7.30.7.1) Heating value

Select from:

LHV

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

683.51

### (7.30.7.3) MWh fuel consumed for self-generation of electricity

0

### (7.30.7.4) MWh fuel consumed for self-generation of heat

0

### (7.30.7.8) Comment

*The gasoline consumption from transportation sources has been considered in the calculation..*

## Total fuel

### (7.30.7.1) Heating value

Select from:

LHV

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

176502.89

### (7.30.7.3) MWh fuel consumed for self-generation of electricity

174665.9

### (7.30.7.4) MWh fuel consumed for self-generation of heat

0

### (7.30.7.8) Comment

*The total of all the fuel types mentioned above has been provided.  
[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)**

23364.49

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

2197.15

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

0

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

0

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

25561.64

[Fixed row]

**(7.45) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO<sub>2</sub>e 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**

0.29

**(7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO<sub>2</sub>e)**

1199173.76

**(7.45.3) Metric denominator**

Select from:

megawatt hour generated (MWh)

**(7.45.4) Metric denominator: Unit total**

4202448.9

**(7.45.5) Scope 2 figure used**

Select from:

Location-based

**(7.45.6) % change from previous year**

**(7.45.7) Direction of change**

Select from:

 Decreased**(7.45.8) Reasons for change**

Select all that apply

 Other emissions reduction activities**(7.45.9) Please explain**

Akenerji's total carbon emission, which was 1,153,476 tonnes CO<sub>2</sub> in 2022, was 1,197,083.62 tonnes CO<sub>2</sub> in 2023. Gross energy generation was 3,904,596 MWh in 2022 and 4,202,449 MWh in 2023. Based on these figures, the emission intensity for each year can be calculated as follows: 2023 Emission Intensity: 4,202,449 MWh / 1,197,083.62 tonnes CO<sub>2</sub> = 0.285 tonnes CO<sub>2</sub> /MWh 2022 Emission Intensity: 3,904,596 MWh / 1,153,476 tonnes CO<sub>2</sub> = 0.295 tonnes CO<sub>2</sub> /MWh Despite the increase in total energy generation from 2022 to 2023, Akenerji managed to reduce its emission intensity from 0.295 tonnes CO<sub>2</sub> /MWh in 2022 to 0.285 tonnes CO<sub>2</sub> /MWh in 2023. This represents a reduction in carbon intensity of approximately 3.41% and shows that the company is generating more energy while minimising its total carbon footprint per unit of energy produced. This reduction in emission intensity is in line with Akenerji's commitment to sustainable energy production and continuous improvements in operational efficiency as part of its broader climate strategy.

[Add row]

**(7.46) For your electric utility activities, provide a breakdown of your Scope 1 emissions and emissions intensity relating to your total power plant capacity and generation during the reporting year by source.**

**Gas****(7.46.1) Absolute scope 1 emissions (metric tons CO<sub>2</sub>e)**

1189189.03

**(7.46.2) Emissions intensity based on gross or net electricity generation**

Select from:

 Gross**(7.46.3) Scope 1 emissions intensity (Gross generation)**

360.19

**(7.46.4) Scope 1 emissions intensity (Net generation)**

367.65

**Hydropower****(7.46.1) Absolute scope 1 emissions (metric tons CO<sub>2</sub>e)**

**(7.46.2) Emissions intensity based on gross or net electricity generation**

Select from:

 Gross**(7.46.3) Scope 1 emissions intensity (Gross generation)**

0.02

**(7.46.4) Scope 1 emissions intensity (Net generation)**

0.03

**Wind****(7.46.1) Absolute scope 1 emissions (metric tons CO<sub>2</sub>e)**

1.38

**(7.46.2) Emissions intensity based on gross or net electricity generation**

Select from:

 Gross**(7.46.3) Scope 1 emissions intensity (Gross generation)**

0.02

**(7.46.4) Scope 1 emissions intensity (Net generation)**

0.02

**Total****(7.46.1) Absolute scope 1 emissions (metric tons CO<sub>2</sub>e)**

1189210.72

**(7.46.2) Emissions intensity based on gross or net electricity generation**

Select from:

 Gross**(7.46.3) Scope 1 emissions intensity (Gross generation)**

282.98

*[Fixed row]***(7.53.2) Provide details of your emissions intensity targets and progress made against those targets.**

## Row 1

### (7.53.2.1) Target reference number

Select from:

Int 1

### (7.53.2.2) Is this a science-based target?

Select from:

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

### (7.53.2.4) Target ambition

Select from:

1.5°C aligned

### (7.53.2.5) Date target was set

12/30/2023

### (7.53.2.6) Target coverage

Select from:

Organization-wide

### (7.53.2.7) Greenhouse gases covered by target

Select all that apply

Carbon dioxide (CO2)

### (7.53.2.8) Scopes

Select all that apply

Scope 1

Scope 2

### (7.53.2.9) Scope 2 accounting method

Select from:

Location-based

### (7.53.2.11) Intensity metric

Select from:

Metric tons CO2e per megawatt hour (MWh)

### (7.53.2.12) End date of base year

12/30/2017

**(7.53.2.13) Intensity figure in base year for Scope 1 (metric tons CO2e per unit of activity)**

0.286

**(7.53.2.14) Intensity figure in base year for Scope 2 (metric tons CO2e per unit of activity)**

0.001

**(7.53.2.33) Intensity figure in base year for all selected Scopes (metric tons CO2e per unit of activity)**

0.2870000000

**(7.53.2.34) % of total base year emissions in Scope 1 covered by this Scope 1 intensity figure**

99.54

**(7.53.2.35) % of total base year emissions in Scope 2 covered by this Scope 2 intensity figure**

0.43

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

99.97

**(7.53.2.55) End date of target**

12/30/2030

**(7.53.2.56) Targeted reduction from base year (%)**

50

**(7.53.2.57) Intensity figure at end date of target for all selected Scopes (metric tons CO2e per unit of activity)**

0.1435000000

**(7.53.2.58) % change anticipated in absolute Scope 1+2 emissions**

50

**(7.53.2.60) Intensity figure in reporting year for Scope 1 (metric tons CO2e per unit of activity)**

0.283

### (7.53.2.61) Intensity figure in reporting year for Scope 2 (metric tons CO<sub>2</sub>e per unit of activity)

0.002

### (7.53.2.80) Intensity figure in reporting year for all selected Scopes (metric tons CO<sub>2</sub>e per unit of activity)

0.2850000000

### (7.53.2.81) Land-related emissions covered by target

Select from:

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

### (7.53.2.82) % of target achieved relative to base year

1.39

### (7.53.2.83) Target status in reporting year

Select from:

New

### (7.53.2.85) Explain target coverage and identify any exclusions

*Scope 3 emissions have been excluded, and a target has been set to reduce emissions by 50% by the year 2030, compared to the Scope 1-2 emission levels recorded in 2017. By excluding Scope 3 emissions, the company aims to concentrate its reduction efforts on areas where it has direct control, ensuring measurable progress towards its decarbonization goals. The 50% reduction target aligns with broader sustainability objectives and demonstrates a commitment to mitigating climate change impacts by addressing operational emissions comprehensively. Taking into account the Sectoral Decarbonisation Approach, Akenerji has determined its strategies and continues to work in harmony, especially in energy generation and transition from fossil fuels such as natural gas to renewable energy. Akenerji's target to reduce Scope 1 and Scope 2 emissions by 50% by 2030 is shaped in line with Turkey's compliance with the Paris Agreement and the energy sector's net zero targets. Both Akenerji's investments in renewable energy sources and energy efficiency projects contribute to this target. Akenerji is in line with the SDA, which aims to reduce the emission intensity in power generation by increasing the weight of the renewable energy portfolio in addition to the production of Erzin CCGT, a natural gas power plant, in order to reduce the emission intensity arising from fossil fuel-based generation. Akenerji's future investments include hybrid solar energy projects, energy storage solutions and energy efficiency studies. These investments will contribute to the reduction of energy intensity and emissions in the electricity generation sector, particularly in line with the Sectoral Decarbonisation Approach.*

### (7.53.2.86) Target objective

*Akenerji aims to reduce Scope 1 and Scope 2 emissions by 50% by 2030 compared to 2017. Akenerji's significant emission sources are Erzin Natural Gas Combined Cycle Power Plant, which is responsible for almost all Scope 1 emissions, and electricity purchases for Scope 2 emissions. Akenerji's target to reduce Scope 1 and Scope 2 emissions by 50% by 2030 is in line with global climate targets and contributes to the decarbonisation of the energy sector.*

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



As Akenerji, we are aware of the critical role of the energy sector in combating climate change and accordingly, we prioritise projects for sustainable energy generation and emission reduction. In 2023, we took the following important steps to realise our target of 50% reduction in our Scope 1 and Scope 2 emissions by 2030, which we set based on 2017. 1. Hybrid Solar Energy Investments In 2023, we initiated hybrid solar energy projects at our existing facilities, especially at our natural gas combined cycle power plant (Erzin CCGT). By adding additional hybrid solar capacity to our Erzin plant, we aim to reduce the use of fossil fuels and increase the share of renewable energy in our operations. As of 2023, we have completed the installation of 3.18 MW of additional capacity with hybrid solar projects and the installation of an additional 4.92 MW capacity is ongoing. These hybrid investments will directly contribute to the reduction of Scope 1 emissions by reducing carbon intensity. 2. Energy Efficiency Efforts Throughout 2023, our efforts to increase energy efficiency continued. We aimed to achieve our emission reduction targets by optimising energy consumption with the ISO 50001:2018 Energy Management System implemented in our facilities. We have increased energy efficiency in our Erzin CCGT facility, especially by improving the ability to operate at low capacity. 3- Strengthening Renewable Energy Capacity: 26% of our total installed capacity is generated from renewable energy sources. In 2023, we carried out the necessary work to maximise our renewable energy generation capacity by making operational improvements and maintenance works at our existing wind and hydroelectric power plants.

### (7.53.2.88) Target derived using a sectoral decarbonization approach

Select from:

Yes

[Add row]

### (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

12/31/2022

#### (7.54.1.3) Target coverage

Select from:

Business activity

#### (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:

Low-carbon energy source(s)

#### (7.54.1.7) End date of base year

12/31/2018

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

25810.34

#### (7.54.1.10) End date of target

12/30/2023

#### (7.54.1.14) Target status in reporting year

Select from:

Achieved

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

Yes, it is a part of our emissions target.

#### (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

There are no exclusions in the target coverage.

#### (7.54.1.20) Target objective

Emissions from electricity consumption, which was 11,132 tonnes CO<sub>2</sub> in 2019 base year, decreased by 12.75% to 9,714 tonnes CO<sub>2</sub> in 2023. This reduction was realised as part of Akenerji's goal to reduce emissions from electricity consumption from the grid.

#### (7.54.1.22) List the actions which contributed most to achieving this target

Ayyıldız WPP: 0.30 MWh Burç Bendi and HEPP: 1.5 MWh Bulam HEPP: 0.60 MWh Erzin NGCCPP: 6.13 MWh Feke I HEPP: 3.0 MWh Feke II HEPP: 5.0 MWh Gökkaya HEPP: 3.0 MWh Himmetli HEPP: 5.0 MWh Uluabat HEPP: The maximum electricity consumption for purposes other than production at the power plant should be the same as the maximum in 2022 (339.934 kWh). Detailed information has been provided on page 125 of our Annual Integrated Report.

## Row 2

#### (7.54.1.1) Target reference number

Select from:

Low 2

#### **(7.54.1.2) Date target was set**

12/31/2022

#### **(7.54.1.3) Target coverage**

Select from:

Business activity

#### **(7.54.1.4) Target type: energy carrier**

Select from:

Electricity

#### **(7.54.1.5) Target type: activity**

Select from:

Production

#### **(7.54.1.6) Target type: energy source**

Select from:

Renewable energy source(s) only

#### **(7.54.1.7) End date of base year**

12/31/2022

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

22522.61

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

21

#### **(7.54.1.10) End date of target**

12/30/2023

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

19

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

19

#### **(7.54.1.13) % of target achieved relative to base year**

**(7.54.1.14) Target status in reporting year**

Select from:

 Achieved and maintained**(7.54.1.16) Is this target part of an emissions target?***Yes, it is a part of our emissions target.***(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***There are no exclusions in the target coverage.***(7.54.1.20) Target objective***In line with the goal of increasing our renewable energy production, a 21% increase in production was targeted for 2023. As of 31.12.2023, this target has been achieved by 19%. The capacity increase of Ayyıldız Wind Power Plant is in progress. When these projects are completed, our renewable energy generation capacity will further expand and contribute to our emission reduction targets.***(7.54.1.22) List the actions which contributed most to achieving this target***The detailed information has been provided on Environmental Performance Indicators tables on 196 to 206 in the Annual Integrated Report.**[Add row]***(7.55.1) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO<sub>2</sub>e savings.**

	Number of initiatives	Total estimated annual CO <sub>2</sub> e savings in metric tonnes CO <sub>2</sub> e (only for rows marked *)
Under investigation	2	<i>*Numeric input</i>
To be implemented	1	6964.2
Implementation commenced	0	0
Implemented	0	0
Not to be implemented	0	<i>*Numeric input</i>

*[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**

Large hydropower (>25 MW)

**(7.55.2.2) Estimated annual CO<sub>2</sub>e savings (metric tonnes CO<sub>2</sub>e)**

305875.99

**(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 C0.4)**

1

**(7.55.2.6) Investment required (unit currency – as specified in C0.4)**

1

**(7.55.2.8) Estimated lifetime of the initiative**

Select from:

>30 years

**(7.55.2.9) Comment**

*As Kemah HEPP is a clean and renewable energy source that generally does not produce direct carbon emissions during operation, the hydroelectric power plant (HPP) we included in the investment plan can significantly reduce CO<sub>2</sub> emissions. The CO<sub>2</sub> emissions avoided by a hydroelectric power plant depend on the amount of energy it produces and the carbon intensity of the electricity mix it replaces. Assuming that the plant typically operates at 30%-40% capacity, depending on water availability and other factors, avoided CO<sub>2</sub> emissions are calculated by multiplying the annual energy production by the carbon intensity of the energy source being replaced. The expected annual electricity generation is 565.39 GWh. Using the current emission factor for hydro projects (0.5410 tCO<sub>2</sub>/MWh) provided by the Turkish Ministry of Energy and Natural Resources, this results in a savings of 305,875.99 tCO<sub>2</sub>e. Feasibility analyses, investment cost and payback periods have been calculated and it has been decided not to share financial data at this stage.*

[Add row]

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

#### **Row 1**

##### **(7.55.3.1) Method**

Select from:

- Financial optimization calculations

##### **(7.55.3.2) Comment**

*Many emissions reduction activities, especially those related to energy efficiency, (for example, our automatic lighting controls) can have a strong ROI.*

#### **Row 3**

##### **(7.55.3.1) Method**

Select from:

- Internal incentives/recognition programs

##### **(7.55.3.2) Comment**

*Monetary based performance evaluations are available for relevant employees in charge of project development, project implementation and corporate environmental sustainability. Also, environmental improvement suggestion system is implemented among the employees, which allow them to have monetary awards for suggestions for increasing environmental performance of the company.*

#### **Row 4**

##### **(7.55.3.1) Method**

Select from:

- Employee engagement

##### **(7.55.3.2) Comment**

*Akenerji runs capacity building and awareness raising activities among the employees regarding environmental sustainability, climate change, energy efficiency and energy efficient office practices among all employees every year.*

#### **Row 5**

##### **(7.55.3.1) Method**

Select from:

- Dedicated budget for energy efficiency

##### **(7.55.3.2) Comment**

*Main source of both our overall and Scope 1 emissions are our Erzin NGCCPP. As Akenerji, we put great importance on energy and emission reduction activities. Therefore, we invested in establishing a state of art high*

efficient natural gas combined cycle power plant named as Erzin NGCCPP. Even though it has a state of art technology, we are continuously working to improve the efficiency.

## Row 6

### (7.55.3.1) Method

Select from:

- Compliance with regulatory requirements/standards

### (7.55.3.2) Comment

*There are increasing numbers of regulations that Akenerji needs to comply with. We have to comply with current MRV Regulation in Turkey (enforced in 2014), which involves monitoring and reporting GHG emissions from our thermal power plant. Also, we are required by Turkish law to recycle waste oil from our power plants. Reporting and verification of the greenhouse gas emissions for years 2017,2018, 2019,2020, 2021, 2022 under ISO 14064 was completed.*

[Add row]

## (7.74.1) Provide details of your products and/or services that you classify as low-carbon products.

### Row 1

#### (7.74.1.1) Level of aggregation

Select from:

- Group of products or services

#### (7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:

- Other, please specify :Renewable Energy Generation

#### (7.74.1.3) Type of product(s) or service(s)

Power

- Hydropower

#### (7.74.1.4) Description of product(s) or service(s)

*Being aware of the importance of renewable energy for the future of the world, Akenerji has put the goal of; continuing renewable energy investments in the future, at the top of its main strategic goals. In this context, all activities are carried out by prioritizing renewable investments and following a sustainable business model. One after the other, Akenerji has put 7 hydroelectric plants and 1 wind power plant into operation. As a result, 320 MW, which corresponds to 26% of Akenerji's installed power, is supplied from renewable sources as of 2021 year-end. Akenerji also evaluates the capacity increase opportunities in existing plants, The investment process was initiated in 2016 in order to boost the installed power in Ayyıldız Wind Power Plant to 28.2 MW from 15 MW. This growth of 13.2 MW was achieved and the plant was commissioned in 2017. Also Ayyıldız WPP capacity will be increased 6.2 MW. Akenerji continues to conduct market research on projects with high capacity utilization and profitability for wind and solar energy to include in its portfolio. The current largest investment for renewable source*

is planned for the Kemah Dam and hydroelectric power plant project with 198 MW installed capacity. The project has particular importance for the company since it is the largest hydro project in the portfolio. The investment studies for the plant, with an anticipated electricity generation figure of 560 GWh per year, are still in progress.

#### (7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

Select from:

No

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

1

### Row 3

#### (7.74.1.1) Level of aggregation

Select from:

Product or service

#### (7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:

Other, please specify :Verified Carbon Standard (VCS), Gold Standard (GS)

#### (7.74.1.3) Type of product(s) or service(s)

Power

Other, please specify :Verified Carbon Standard (VCS), Gold Standard (GS)

#### (7.74.1.4) Description of product(s) or service(s)

*Carbon-neutral Certifications: We offer internationally-approved emission reduction certifications to customers through our renewable energy investments. These certifications enable companies to become carbon-neutral in terms of the electricity they consume. This solution helps environmentally responsive companies that would like to mitigate or diminish to “zero” carbon footprints resulting from electricity consumption and other processes.*

#### (7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

Select from:

No

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

1

### Row 4



### (7.74.1.1) Level of aggregation

Select from:

- Product or service

### (7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:

- Other, please specify :Energy Services for Efficiency

### (7.74.1.3) Type of product(s) or service(s)

**Power**

- Other, please specify :Energy Services for Efficiency

### (7.74.1.4) Description of product(s) or service(s)

*Energy Services: Akenerji Energy Services aims to reduce energy costs and enhance their competitive edge with the wide variety of services on offer, from consultancy to asset management. Along with the efficiency-enhancing project consultancy and turnkey application projects offered to industrial facilities, the investment-free and guaranteed energy efficiency services offered to commercial buildings, presents guaranteed working models that are suitable for the structure of the enterprise and that will provide maximum profit for both parties. Akenerji Energy Services continued to provide the highest energy efficiency in its sector in 2021 with an average energy efficiency of 35% in electric energy and an average of 55% in natural gas. This was achieved with the projects it carried out since 2015 without incurring any additional investment. In addition to our efficiency, we have also added value to the plants in which we are active by extending the longevity of equipment and lowering operational maintenance costs. 2023 Results of our System Efficiency Studies Hydroelectric Power Plants Availability: 98.14 Gross Production 814,465,839 kWh Capacity Utilisation Rate: 32.14 Natural Gas Combined Cycle Power Plant Availability: 92% Gross Production: 3.301.555.642 kWh Capacity Utilisation Rate: 41.76 Wind Power Plant Availability: 98.52 Gross Production: 86.427.423 kWh Capacity Utilisation Rate: 35.01*

### (7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

Select from:

- No

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

1  
[Add row]

## C9. Environmental performance - Water security

### (9.1.1) Provide details on these exclusions.

#### Row 1

##### (9.1.1.1) Exclusion

Select from:

- Specific groups, businesses, or organizations

##### (9.1.1.2) Description of exclusion

*We have a small office in Ankara, with only four employees. It has a minimal environmental impact in terms of water footprint.*

##### (9.1.1.3) Reason for exclusion

Select from:

- Other, please specify :Negligible data

##### (9.1.1.7) Percentage of water volume the exclusion represents

Select from:

- Less than 1%

##### (9.1.1.8) Please explain

*Our small office in Ankara, with only four employees, has an environmental impact of less than 1% in terms of water consumption within Akenerji's production operations. Due to its size, the domestic water consumption of the employees is extremely low and contributes a negligible environmental footprint. As a result, both the water footprint and environmental impact of the Ankara office are considered insignificant and are not included in our water footprint calculations or reporting.*

[Add row]

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

#### Water withdrawals – total volumes

##### (9.2.1) % of sites/facilities/operations

Select from:

- 100%

##### (9.2.2) Frequency of measurement

Select from:

- Continuously

### (9.2.3) Method of measurement

*Water withdrawals at our HEPPs and WPPs are calculated based on the workforce size and operational requirements, while at our Erzin power plant, it is accurately monitored through metering systems.*

### (9.2.4) Please explain

*All water withdrawals are regularly measured and monitored at every site. We operate several types of power plants, and water withdrawals at each facility are continuously monitored and examined. At our Erzin Natural Gas Combined Cycle Power Plant (NGCCPP), water for cooling, process use, WASH, and other purposes is sourced from the Mediterranean Sea, and these withdrawals are closely monitored. In our HEPPs, the potential energy of water is converted into mechanical energy to generate electricity. Water withdrawals at all HEPPs are used exclusively for domestic purposes (cooking, sanitation, garden irrigation). We measure and monitor water withdrawal volumes for all our facilities.*

## Water withdrawals – volumes by source

### (9.2.1) % of sites/facilities/operations

Select from:

100%

### (9.2.2) Frequency of measurement

Select from:

Continuously

### (9.2.3) Method of measurement

*Water withdrawals at our HEPPs and WPPs are calculated based on the workforce size and operational requirements, while at our Erzin power plant, it is accurately monitored through metering systems.*

### (9.2.4) Please explain

*We operate different types of power plants, and all water withdrawals are continuously measured and monitored. At our Erzin Natural Gas Combined Cycle Power Plant, we monitor water withdrawals, with cooling, process, WASH, and other consumption water being sourced from the Mediterranean Sea. At every location for our facilities, we measure and monitor water withdrawal volumes by source.*

## Water withdrawals quality

### (9.2.1) % of sites/facilities/operations

Select from:

76-99

### (9.2.2) Frequency of measurement

Select from:

Continuously

### (9.2.3) Method of measurement

In Erzin NGCCGT, we monitor the following parameters: temperature, pH, total P, total coliform, fecal coliform, NH<sub>3</sub>, suspended solids, dissolved oxygen, BOD<sub>5</sub>, and salinity. In WPPs and HEPPs, water quality is not monitored.

#### **(9.2.4) Please explain**

In HEPPs, we do not require water quality data because we only use the potential energy of the water, which is transformed into mechanical energy for power generation. At the Erzin NGCCGT, water supply and quality are managed through a reverse osmosis system, which treats seawater to meet operational needs. The wastewater generated during operation is treated in a permanent treatment plant and discharged into the sea in compliance with national regulations. Seawater is also used as cooling water in the process. High-pressure steam and turbines utilize seawater, which is treated via reverse osmosis and used in the cooling process through a high-tech treatment plant. As a result, we closely monitor and control seawater quality during both withdrawal and discharge.

### **Water discharges – total volumes**

#### **(9.2.1) % of sites/facilities/operations**

Select from:

100%

#### **(9.2.2) Frequency of measurement**

Select from:

Continuously

#### **(9.2.3) Method of measurement**

Akenerji's Erzin NGCCPP has a remote wastewater monitoring station on-site, and the discharge water is simultaneously monitored by the Ministry of Environment, Urbanization, and Climate Change.

#### **(9.2.4) Please explain**

100% of the total volume of water discharged is regularly measured and monitored at all sites. At the Erzin NGCCPP, wastewater is discharged into the Mediterranean Sea. One of the key environmental permit conditions for the Erzin Plant is the monitoring of deep-sea discharges. Therefore, we continuously measure and monitor this water aspect using the Continuous Air Emission Monitoring System and the Continuous Wastewater Monitoring System. The Ministry of Environment, Urbanization, and Climate Change also oversees these monitoring systems. In our HEPPs, domestic wastewater is collected in septic tanks and transported by sewage trucks to municipal treatment plants, ensuring the water discharge volumes are also measured and monitored.

### **Water discharges – volumes by destination**

#### **(9.2.1) % of sites/facilities/operations**

Select from:

100%

#### **(9.2.2) Frequency of measurement**

Select from:

Continuously

### **(9.2.3) Method of measurement**

*Akenerji's Erzin NGCCPP has a remote wastewater monitoring station on-site, and the discharge water is simultaneously monitored by the Ministry of Environment, Urbanization, and Climate Change.*

### **(9.2.4) Please explain**

*100% of the total volume of water discharged by destination is regularly measured and monitored at all sites. At the Erzin NGCCPP, wastewater is discharged into the Mediterranean Sea. One of the key environmental permit conditions for the Erzin Plant is the monitoring of deep-sea discharges. Therefore, we continuously measure and monitor this water aspect using the Continuous Air Emission Monitoring System and the Continuous Wastewater Monitoring System. The Ministry of Environment, Urbanization, and Climate Change also oversees these monitoring systems. In our HEPPs, domestic wastewater is collected in septic tanks and transported by sewage trucks to municipal treatment plants, ensuring the water discharge volumes by destination are also measured and monitored.*

## **Water discharges – volumes by treatment method**

### **(9.2.1) % of sites/facilities/operations**

Select from:

100%

### **(9.2.2) Frequency of measurement**

Select from:

Continuously

### **(9.2.3) Method of measurement**

*Akenerji's Erzin NGCCPP has a remote wastewater monitoring station on-site, and the discharge water is simultaneously monitored by the Ministry of Environment, Urbanization, and Climate Change.*

### **(9.2.4) Please explain**

*For water discharges – volumes by treatment method, we ensure that all wastewater is properly treated before discharge. At our Erzin NGCCPP, wastewater is treated on-site treatment plant and then discharged into the Mediterranean Sea, in full compliance with national regulations. The treatment process includes advanced techniques such as reverse osmosis, ensuring the discharge meets legal limits. Additionally, deep-sea discharges are closely monitored as part of our environmental permit requirements, with continuous monitoring systems in place. For our HEPPs, domestic wastewater is collected in septic tanks and transported to municipal treatment plants for proper processing and disposal. These treatment methods are monitored regularly to ensure compliance with both internal standards and regulatory requirements.*

## **Water discharge quality – by standard effluent parameters**

### **(9.2.1) % of sites/facilities/operations**

Select from:

100%

### **(9.2.2) Frequency of measurement**

Select from:

Continuously

### (9.2.3) Method of measurement

*Akenerji's Erzin NGCCPP has a remote wastewater monitoring station on-site, and the discharge water is simultaneously monitored by the Ministry of Environment, Urbanization, and Climate Change.*

### (9.2.4) Please explain

*99.98% of the total volume of water discharged is regularly measured and monitored for water quality using standard effluent parameters. Since Erzin NGCCPP is a Natural Gas Combined Cycle Power Plant, it requires a large amount of water for the cooling process, which accounts for 99.98% of our total water discharge. Wastewater from Erzin NGCCPP is discharged into the Mediterranean Sea, and one of the environmental permit conditions for the plant is the monitoring of water quality through standard effluent parameters. Therefore, we regularly measure and monitor these parameters. In our HEPPs, domestic wastewater is collected in septic tanks and transported by sewage trucks to municipal treatment plants. As a result, wastewater quality monitoring by standard effluent parameters is not conducted at these sites, but this accounts for only 0.02% of the total volume, and the source is domestic use.*

## Water discharge quality – emissions to water (nitrates, phosphates, pesticides, and/or other priority substances)

### (9.2.1) % of sites/facilities/operations

Select from:

Not relevant

### (9.2.4) Please explain

*Erzin Natural Gas Combined Cycle Power Plant is the only facility that discharges directly into a receiving environment. In this plant, the parameters related to nitrates, phosphates, and other priority substances are not present in the wastewater measurement results, as these are not part of the typical discharge profile. However, during seawater quality monitoring, we assess total phosphorus and nitrate levels in compliance with environmental regulations.*

## Water discharge quality – temperature

### (9.2.1) % of sites/facilities/operations

Select from:

76-99

### (9.2.2) Frequency of measurement

Select from:

Continuously

### (9.2.3) Method of measurement

*Akenerji's Erzin NGCCPP has a remote wastewater monitoring station on-site, and the discharge water is simultaneously monitored by the Ministry of Environment, Urbanization, and Climate Change.*

### (9.2.4) Please explain

Akenerji's portfolio includes both a natural gas combined cycle power plant and hydroelectric power plants. At the Erzin NGCCPP, seawater is used for both withdrawal and discharge. In accordance with the plant's environmental permit, key performance indicators such as standard effluent parameters and temperature increases in the discharged water are regularly measured, monitored, and must meet specified limits.

## Water consumption – total volume

### (9.2.1) % of sites/facilities/operations

Select from:

100%

### (9.2.2) Frequency of measurement

Select from:

Continuously

### (9.2.3) Method of measurement

Total water consumption is measured using meters to ensure accuracy.

### (9.2.4) Please explain

We regularly measure and monitor 100% of our water withdrawals and discharges across all sites. As a result, our water consumption is fully measured and monitored on a consistent basis.

## Water recycled/reused

### (9.2.1) % of sites/facilities/operations

Select from:

76-99

### (9.2.2) Frequency of measurement

Select from:

Continuously

### (9.2.3) Method of measurement

Total water recycled is measured using meters.

### (9.2.4) Please explain

The cooling water technology used is a recirculating or closed-loop system, which reuses the cooling water instead of releasing it directly back into the sea.

## The provision of fully-functioning, safely managed WASH services to all workers

### (9.2.1) % of sites/facilities/operations

Select from:

76-99

## (9.2.2) Frequency of measurement

Select from:

Other, please specify :Not in a specifically defined regular manner

## (9.2.3) Method of measurement

*It is measured by using meters.*

## (9.2.4) Please explain

*At Erzin NGCCPP, water used for facilities providing fully functioning WASH services for all workers is not measured separately. As a result, water aspects related to WASH services are not regularly measured and monitored at this plant, while such monitoring is conducted at only one of our 7 hydro power plants.*

*[Fixed row]*

## (9.2.1) For your hydropower operations, what proportion of the following water aspects are regularly measured and monitored?

### Fulfilment of downstream environmental flows

#### (9.2.1.1) % of sites/facilities/operations measured and monitored

Select from:

100%

#### (9.2.1.2) Please explain

*Akenerji analyzes and monitors downstream flows of all of its hydro power plants. The Ministry of Environment, Urbanization, and Climate Change also monitors environmental flow, which is the minimal amount of water that must be left in the riverbed along the penstock per environmental regulations, via an online system.*

### Sediment loading

#### (9.2.1.1) % of sites/facilities/operations measured and monitored

Select from:

100%

#### (9.2.1.2) Please explain

*Sediment accumulation upstream of the reservoir is constantly monitored as part of the hydroelectric power plant's operating regulations. In 2023, a tailwater dredging operation was conducted at our cascade-type power plants in Adana (Feke 1 HEPP, Himmetli HEPP, and Gökkaya HEPP). This effort was necessary due to the accumulation of sediments, gravel, stones, and rocks in the riverbeds caused by seasonal floods during the winter months. These deposits raised tailwater levels and negatively impacted the operational efficiency and production output of the plants. By removing the sediment from the riverbeds, the plants were able to restore their previous performance and operational efficiency. This process helps mitigate the impact of sediment loading on the plants' ability to generate electricity effectively.*

### Other, please specify



### (9.2.1.1) % of sites/facilities/operations measured and monitored

Select from:

Not relevant

### (9.2.1.2) Please explain

Not applicable.

[Fixed row]

**(9.2.2) What are the total volumes of water withdrawn, discharged, and consumed across all your operations, how do they compare to the previous reporting year, and how are they forecasted to change?**

### Total withdrawals

#### (9.2.2.1) Volume (megaliters/year)

11994.66

#### (9.2.2.2) Comparison with previous reporting year

Select from:

Lower

#### (9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

Increase/decrease in business activity

#### (9.2.2.4) Five-year forecast

Select from:

Lower

#### (9.2.2.5) Primary reason for forecast

Select from:

Increase/decrease in efficiency

#### (9.2.2.6) Please explain

*Although electricity generation increased by approximately 8% in 2023 compared to 2022, water withdrawal decreased by 6.5%. This reduction was due to maintenance and downtime at our Erzin plant. In the following years, studies are planned to further increase efficiency, with the aim of continuing to reduce the total volume of water withdrawals.*

### Total discharges

#### (9.2.2.1) Volume (megaliters/year)

10690.63

### (9.2.2.2) Comparison with previous reporting year

Select from:

About the same

### (9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

Increase/decrease in business activity

### (9.2.2.4) Five-year forecast

Select from:

Lower

### (9.2.2.5) Primary reason for forecast

Select from:

Increase/decrease in efficiency

### (9.2.2.6) Please explain

*The total volume of water consumed has reduced by 0.8% as compared to the previous year. As a result, the 2023 withdrawal amount is nearly identical to the previous year. Therefore, the withdrawal amount for 2023 is almost the same as last year. In the following years, it is planned to carry out studies to further increase efficiency and it is aimed to reduce the water discharge-generation ratio.*

## Total consumption

### (9.2.2.1) Volume (megaliters/year)

1304.03

### (9.2.2.2) Comparison with previous reporting year

Select from:

Much lower

### (9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

Increase/decrease in business activity

### (9.2.2.4) Five-year forecast

Select from:

Lower

### (9.2.2.5) Primary reason for forecast

Select from:

Increase/decrease in efficiency

#### (9.2.2.6) Please explain

*The total volume of water consumed is decreased by 36% in comparison to the previous year. The significant decrease in 2023 was primarily due to reduced operations at our Erzin plant, which accounts for the majority of our total water usage, as a result of maintenance and downtime. To reduce water consumption, we have set 2021 as our reference year, during which water consumption was 2,725.73 megaliters per year. For our 2024/2025 target, we aim to further reduce water consumption to 2,453.16 megaliters per year, aligning with our ongoing efforts to improve efficiency and sustainability.*

[Fixed row]

**(9.2.4) Indicate whether water is withdrawn from areas with water stress, provide the volume, how it compares with the previous reporting year, and how it is forecasted to change.**

#### (9.2.4.1) Withdrawals are from areas with water stress

Select from:

Yes

#### (9.2.4.2) Volume withdrawn from areas with water stress (megaliters)

11944.19

#### (9.2.4.3) Comparison with previous reporting year

Select from:

Lower

#### (9.2.4.4) Primary reason for comparison with previous reporting year

Select from:

Increase/decrease in business activity

#### (9.2.4.5) Five-year forecast

Select from:

Lower

#### (9.2.4.6) Primary reason for forecast

Select from:

Increase/decrease in efficiency

#### (9.2.4.7) % of total withdrawals that are withdrawn from areas with water stress

99.58

### (9.2.4.8) Identification tool

Select all that apply

WRI Aqueduct

### (9.2.4.9) Please explain

*We operate in regions where water stress exists, and we use the WRI Aqueduct Water Risk Atlas tool to assess water-related risks, such as baseline water stress, projected changes in water stress, flood occurrence, drought severity, and groundwater stress. By inputting the coordinates of each of our locations into the tool, we evaluated the water stress risk for each site based on its specific basin. Feke 1, Feke 2, Himmetli, Gökkaya HEPP, Erzin NGCCPP, and our Head Office in Turkey are identified as being in areas with Extremely High-Water Stress Levels (80%), accounting for the vast majority of our total water withdrawal. Meanwhile, Burç HEPP and Bulam HEPP are located in regions with Low-Water Stress Levels (10%), representing minimal amount of our total water withdrawal. Uluabat HEPP and Ayyıldız WPP are located in areas with High Water Stress Levels (40-80%), contributing only a small fraction of the total water withdrawal. According to WRI data, Bulam and Burç are in the least water-stressed regions. Therefore, the withdrawal amounts from these regions were excluded from the total, allowing us to calculate the water withdrawn from stressed regions. Based on this methodology, the water withdrawal rate from stressed regions decreased by 6.5% compared to the previous year, largely due to improvements in the efficiency of the water withdrawal process. Efforts are underway to further enhance this efficiency in the coming years.*

[Fixed row]

### (9.2.7) Provide total water withdrawal data by source.

#### Fresh surface water, including rainwater, water from wetlands, rivers, and lakes

#### (9.2.7.1) Relevance

Select from:

Relevant

#### (9.2.7.2) Volume (megaliters/year)

0.09

#### (9.2.7.3) Comparison with previous reporting year

Select from:

About the same

#### (9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

Increase/decrease in business activity

#### (9.2.7.5) Please explain

*Fresh surface water withdrawals are increased by 2.5% in comparison to the last year because of the increase in electricity generation.*

#### Brackish surface water/Seawater

### (9.2.7.1) Relevance

Select from:

Relevant

### (9.2.7.2) Volume (megaliters/year)

11984.15

### (9.2.7.3) Comparison with previous reporting year

Select from:

Lower

### (9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

Increase/decrease in business activity

### (9.2.7.5) Please explain

*Water withdrawals decreased by 6.5 percent compared to the previous year because of the maintenance period of Erzin NGCCPP.*

## Groundwater – renewable

### (9.2.7.1) Relevance

Select from:

Relevant

### (9.2.7.2) Volume (megaliters/year)

2.99

### (9.2.7.3) Comparison with previous reporting year

Select from:

Lower

### (9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

Increase/decrease in business activity

### (9.2.7.5) Please explain

*Groundwater-renewable withdrawals are decreased by 11% in comparison to the previous year.*

## Groundwater – non-renewable

### (9.2.7.1) Relevance

Select from:

Not relevant

### (9.2.7.5) Please explain

*Not applicable.*

## Produced/Entrained water

### (9.2.7.1) Relevance

Select from:

Not relevant

### (9.2.7.5) Please explain

*Not applicable.*

## Third party sources

### (9.2.7.1) Relevance

Select from:

Relevant

### (9.2.7.2) Volume (megaliters/year)

7.42

### (9.2.7.3) Comparison with previous reporting year

Select from:

Much lower

### (9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

Increase/decrease in business activity

### (9.2.7.5) Please explain

*Withdrawals from third party sources are increased by 27% in comparison to the previous year.  
[Fixed row]*

## (9.2.8) Provide total water discharge data by destination.

## Fresh surface water

### (9.2.8.1) Relevance

Select from:

Not relevant

### (9.2.8.5) Please explain

*We do not discharge wastewater to fresh surface water bodies. Hence, it is not applicable.*

## Brackish surface water/seawater

### (9.2.8.1) Relevance

Select from:

Relevant

### (9.2.8.2) Volume (megaliters/year)

10689.97

### (9.2.8.3) Comparison with previous reporting year

Select from:

About the same

### (9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

Increase/decrease in business activity

### (9.2.8.5) Please explain

*Discharge to seawater is decreased by 0.8% in comparison to the previous year, which is about the same.*

## Groundwater

### (9.2.8.1) Relevance

Select from:

Not relevant

### (9.2.8.5) Please explain

*We do not discharge wastewater to the groundwater. Hence, it is not applicable.*

## Third-party destinations

### (9.2.8.1) Relevance

Select from:

Relevant

### (9.2.8.2) Volume (megaliters/year)

0.66

### (9.2.8.3) Comparison with previous reporting year

Select from:

Much lower

### (9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

Increase/decrease in business activity

### (9.2.8.5) Please explain

*At our HEPPs and Ayyıldız WPP, domestic wastewater is collected in septic tanks and transported by sewage trucks to municipal treatment plants. Similarly, our Head Office discharges wastewater directly to a municipal treatment facility. Overall, wastewater discharge to third party destinations has decreased by 29.5% compared to the previous year.*

*[Fixed row]*

**(9.2.9) Within your direct operations, indicate the highest level(s) to which you treat your discharge.**

### **Tertiary treatment**

#### (9.2.9.1) Relevance of treatment level to discharge

Select from:

Not relevant

#### (9.2.9.6) Please explain

*At the Erzin Natural Gas Combined Cycle Power Plant, seawater is treated using a reverse osmosis to make it suitable for use. However, no tertiary treatment methods are applied for wastewater treatment. Hence, it is not relevant.*

### **Secondary treatment**

#### (9.2.9.1) Relevance of treatment level to discharge

Select from:

Relevant

#### (9.2.9.2) Volume (megaliters/year)

1157.02

#### (9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

Lower

#### (9.2.9.4) Primary reason for comparison with previous reporting year



Select from:

Increase/decrease in business activity

### (9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

1-10

### (9.2.9.6) Please explain

*Akenerji's secondary treatment processes also include neutralization of wastewater to balance its pH levels before discharge. This step ensures that the wastewater meets environmental discharge limits and is safe for release into natural water bodies or further treatment.*

## Primary treatment only

### (9.2.9.1) Relevance of treatment level to discharge

Select from:

Relevant

### (9.2.9.2) Volume (megaliters/year)

42.4

### (9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

Lower

### (9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

Increase/decrease in business activity

### (9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

1-10

### (9.2.9.6) Please explain

*At Akenerji, primary treatment processes are focused on the removal of suspended solids and large particulate matter from wastewater. This is typically achieved through physical processes such as sedimentation, ensuring that the larger, more easily separable contaminants are removed before the wastewater is either discharged or sent for further treatment.*

## Discharge to the natural environment without treatment

### (9.2.9.1) Relevance of treatment level to discharge

Select from:

Not relevant

### (9.2.9.6) Please explain

*At the Erzin Natural Gas Combined Cycle Power Plant, we discharge water into the deep sea in accordance with our environmental permit. We have a wastewater treatment plant that treats industrial wastewater, domestic wastewater, and rainwater. The treatment process includes the removal of Total Suspended Solids, neutralization, and wastewater treatment plant processes. We do not discharge wastewater to the natural environment without treatment. Hence, it is not relevant.*

## Discharge to a third party without treatment

### (9.2.9.1) Relevance of treatment level to discharge

Select from:

Relevant

### (9.2.9.2) Volume (megaliters/year)

9490.6

### (9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

Lower

### (9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

Increase/decrease in business activity

### (9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

81-90

### (9.2.9.6) Please explain

*We do not treat the wastewater generated from our 1 wind power plant and 7 hydroelectric power plants on-site; instead, the domestic wastewater is collected in septic tanks and transported by sewage trucks to municipal treatment plants, in accordance with our agreements with the municipality.*

## Other

### (9.2.9.1) Relevance of treatment level to discharge

Select from:

Not relevant

### (9.2.9.6) Please explain

*Not applicable.  
[Fixed row]*

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

	Emissions to water in the reporting year (metric tons)
	0

[Fixed row]

**(9.3) In your direct operations and upstream value chain, what is the number of facilities where you have identified substantive water-related dependencies, impacts, risks, and opportunities?**

**Direct operations**

**(9.3.1) Identification of facilities in the value chain stage**

Select from:

Yes, we have assessed this value chain stage and identified facilities with water-related dependencies, impacts, risks, and opportunities

**(9.3.2) Total number of facilities identified**

9

**(9.3.3) % of facilities in direct operations that this represents**

Select from:

100%

**(9.3.4) Please explain**

*At Akenerji, we conduct facility-based assessments to evaluate water-related dependencies, impacts, risks, and opportunities. This targeted approach ensures that our environmental strategies are tailored to address the unique conditions and challenges at each of our 9 facilities. By systematically analyzing these factors, we enhance our capacity to manage water resources sustainably and proactively mitigate potential environmental risks.*

**Upstream value chain**

**(9.3.1) Identification of facilities in the value chain stage**

Select from:

No, we have assessed this value chain stage but did not identify any facilities with water-related dependencies, impacts, risks, and opportunities

**(9.3.4) Please explain**

We recognize the dependencies, impacts, risks, and opportunities within our upstream value chain related to water. However, a comprehensive water-related dependency, impact, risk and opportunity assessment, directly based on the quantity or specific characteristics of our facilities, has yet to be conducted. We are going to integrate this analysis into our future environmental strategy to enhance our understanding and management of water-related risk.

[Fixed row]

**(9.3.1) For each facility referenced in 9.3, provide coordinates, water accounting data, and a comparison with the previous reporting year.**

## Row 1

### (9.3.1.1) Facility reference number

Select from:

Facility 1

### (9.3.1.2) Facility name (optional)

Feke / HEPP

### (9.3.1.3) Value chain stage

Select from:

Direct operations

### (9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

Dependencies

Impacts

Risks

Opportunities

### (9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

Yes, withdrawals and discharges

### (9.3.1.7) Country/Area & River basin

Turkey

Other, please specify :Seyhan

### (9.3.1.8) Latitude

37.82288

### (9.3.1.9) Longitude

**(9.3.1.10) Located in area with water stress**

Select from:

Yes

**(9.3.1.11) Primary power generation source for your electricity generation at this facility**

Select from:

Hydropower

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

0.64

**(9.3.1.14) Comparison of total withdrawals with previous reporting year**

Select from:

About the same

**(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes**

0

**(9.3.1.16) Withdrawals from brackish surface water/seawater**

0

**(9.3.1.17) Withdrawals from groundwater - renewable**

0

**(9.3.1.18) Withdrawals from groundwater - non-renewable**

0

**(9.3.1.19) Withdrawals from produced/entrained water**

0

**(9.3.1.20) Withdrawals from third party sources**

0.64

**(9.3.1.21) Total water discharges at this facility (megaliters)**

0.12

**(9.3.1.22) Comparison of total discharges with previous reporting year**

Select from:

Much lower

**(9.3.1.23) Discharges to fresh surface water**

0

**(9.3.1.24) Discharges to brackish surface water/seawater**

0

**(9.3.1.25) Discharges to groundwater**

0

**(9.3.1.26) Discharges to third party destinations**

0.12

**(9.3.1.27) Total water consumption at this facility (megaliters)**

0.53

**(9.3.1.28) Comparison of total consumption with previous reporting year**

Select from:

Much lower

**(9.3.1.29) Please explain**

*Location: Adana Energy Source&Type: River, Hydro Installed Capacity: 30 MW Date of Operation: 2012  
Generation Gross: 96,205.8 MWh (2023) Capacity Utilization Rate: 37.34%*

**Row 2**

**(9.3.1.1) Facility reference number**

Select from:

Facility 2

**(9.3.1.2) Facility name (optional)**

*Feke II HEPP*

**(9.3.1.3) Value chain stage**

Select from:

Direct operations

**(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility**

Select all that apply

Dependencies

Impacts

Risks

Opportunities

### (9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

Yes, withdrawals and discharges

### (9.3.1.7) Country/Area & River basin

**Turkey**

Other, please specify :Seyhan

### (9.3.1.8) Latitude

37.7442

### (9.3.1.9) Longitude

35.86424

### (9.3.1.10) Located in area with water stress

Select from:

Yes

### (9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

Hydropower

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

0.27

### (9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

About the same

### (9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

### (9.3.1.16) Withdrawals from brackish surface water/seawater

0

### (9.3.1.17) Withdrawals from groundwater - renewable

0.27

**(9.3.1.18) Withdrawals from groundwater - non-renewable**

0

**(9.3.1.19) Withdrawals from produced/entrained water**

0

**(9.3.1.20) Withdrawals from third party sources**

0

**(9.3.1.21) Total water discharges at this facility (megaliters)**

0.07

**(9.3.1.22) Comparison of total discharges with previous reporting year**

Select from:

About the same

**(9.3.1.23) Discharges to fresh surface water**

0

**(9.3.1.24) Discharges to brackish surface water/seawater**

0

**(9.3.1.25) Discharges to groundwater**

0

**(9.3.1.26) Discharges to third party destinations**

0.07

**(9.3.1.27) Total water consumption at this facility (megaliters)**

0.21

**(9.3.1.28) Comparison of total consumption with previous reporting year**

Select from:

About the same

**(9.3.1.29) Please explain**

Location: Adana Energy Source&Type: Reservoir, Hydro Installed Capacity: 70 MW Date of Operation: 2010  
Generation Gross: 131,530.3 MWh (2023) Capacity Utilization Rate: 21.59% • With +/- 15 MW SFC reserve  
capacity Feke-II.



### Row 3

#### (9.3.1.1) Facility reference number

Select from:

- Facility 3

#### (9.3.1.2) Facility name (optional)

Himmetli HEPP

#### (9.3.1.3) Value chain stage

Select from:

- Direct operations

#### (9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

- Dependencies
- Impacts
- Risks
- Opportunities

#### (9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

- Yes, withdrawals and discharges

#### (9.3.1.7) Country/Area & River basin

Turkey

- Other, please specify :Seyhan

#### (9.3.1.8) Latitude

37.87612

#### (9.3.1.9) Longitude

35.9983

#### (9.3.1.10) Located in area with water stress

Select from:

- Yes

#### (9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

- Hydropower

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

6.29

**(9.3.1.14) Comparison of total withdrawals with previous reporting year**

Select from:

Much higher

**(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes**

0

**(9.3.1.16) Withdrawals from brackish surface water/seawater**

0

**(9.3.1.17) Withdrawals from groundwater - renewable**

0

**(9.3.1.18) Withdrawals from groundwater - non-renewable**

0

**(9.3.1.19) Withdrawals from produced/entrained water**

0

**(9.3.1.20) Withdrawals from third party sources**

6.29

**(9.3.1.21) Total water discharges at this facility (megaliters)**

0.19

**(9.3.1.22) Comparison of total discharges with previous reporting year**

Select from:

Much lower

**(9.3.1.23) Discharges to fresh surface water**

0

**(9.3.1.24) Discharges to brackish surface water/seawater**

0

**(9.3.1.25) Discharges to groundwater**

0

### (9.3.1.26) Discharges to third party destinations

0.19

### (9.3.1.27) Total water consumption at this facility (megaliters)

6.1

### (9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

Much higher

### (9.3.1.29) Please explain

*Location: Adana Energy Source&Type: River Type Hydro Installed Capacity: 27 MW Date of Operation: 2012  
Generation Gross: 90,910 MWh (2023) Capacity Utilization Rate: 38.46%*

## Row 4

### (9.3.1.1) Facility reference number

Select from:

Facility 4

### (9.3.1.2) Facility name (optional)

Gökkaya HEPP

### (9.3.1.3) Value chain stage

Select from:

Direct operations

### (9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

Dependencies

Impacts

Risks

Opportunities

### (9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

Yes, withdrawals and discharges

### (9.3.1.7) Country/Area & River basin

**Turkey**

Other, please specify :Seyhan

**(9.3.1.8) Latitude**

37.86135

**(9.3.1.9) Longitude**

36.07391

**(9.3.1.10) Located in area with water stress**

Select from:

Yes

**(9.3.1.11) Primary power generation source for your electricity generation at this facility**

Select from:

Hydropower

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

0.49

**(9.3.1.14) Comparison of total withdrawals with previous reporting year**

Select from:

Much lower

**(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes**

0

**(9.3.1.16) Withdrawals from brackish surface water/seawater**

0

**(9.3.1.17) Withdrawals from groundwater - renewable**

0

**(9.3.1.18) Withdrawals from groundwater - non-renewable**

0

**(9.3.1.19) Withdrawals from produced/entrained water**

0

**(9.3.1.20) Withdrawals from third party sources**

0.49

**(9.3.1.21) Total water discharges at this facility (megaliters)**

0.12

**(9.3.1.22) Comparison of total discharges with previous reporting year**

Select from:

Lower

**(9.3.1.23) Discharges to fresh surface water**

0

**(9.3.1.24) Discharges to brackish surface water/seawater**

0

**(9.3.1.25) Discharges to groundwater**

0

**(9.3.1.26) Discharges to third party destinations**

0.12

**(9.3.1.27) Total water consumption at this facility (megaliters)**

0.37

**(9.3.1.28) Comparison of total consumption with previous reporting year**

Select from:

Much lower

**(9.3.1.29) Please explain**

*Location: Adana Energy Source&Type: River, Hydro Installed Capacity: 30 MW Date of Operation: 2012  
Generation Gross: 86,005.96 MWh (2023)*

**Row 5**

**(9.3.1.1) Facility reference number**

Select from:

Facility 5

**(9.3.1.2) Facility name (optional)**

*Burç HEPP*

**(9.3.1.3) Value chain stage**

Select from:

Direct operations

#### (9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

Dependencies

Impacts

Risks

Opportunities

#### (9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

Yes, withdrawals and discharges

#### (9.3.1.7) Country/Area & River basin

**Turkey**

Other, please specify :Ceyhan

#### (9.3.1.8) Latitude

37.46345

#### (9.3.1.9) Longitude

38.17085

#### (9.3.1.10) Located in area with water stress

Select from:

No

#### (9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

Hydropower

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

0.38

#### (9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

Much higher

#### (9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

**(9.3.1.16) Withdrawals from brackish surface water/seawater**

0

**(9.3.1.17) Withdrawals from groundwater - renewable**

0.38

**(9.3.1.18) Withdrawals from groundwater - non-renewable**

0

**(9.3.1.19) Withdrawals from produced/entrained water**

0

**(9.3.1.20) Withdrawals from third party sources**

0

**(9.3.1.21) Total water discharges at this facility (megaliters)**

0.01

**(9.3.1.22) Comparison of total discharges with previous reporting year**

Select from:

About the same

**(9.3.1.23) Discharges to fresh surface water**

0

**(9.3.1.24) Discharges to brackish surface water/seawater**

0

**(9.3.1.25) Discharges to groundwater**

0

**(9.3.1.26) Discharges to third party destinations**

0.01

**(9.3.1.27) Total water consumption at this facility (megaliters)**

0.37

**(9.3.1.28) Comparison of total consumption with previous reporting year**

Select from:

Much higher

### (9.3.1.29) Please explain

*Location: Adiyaman Energy Source&Type: River Type Hydro Installed Capacity: 28 MW Date of Operation: 2010 Generation Gross: 74,863.77 MWh (2023) Capacity Utilization Rate: 31.25%*

## Row 6

### (9.3.1.1) Facility reference number

Select from:

Facility 6

### (9.3.1.2) Facility name (optional)

*Bulam HEPP*

### (9.3.1.3) Value chain stage

Select from:

Direct operations

### (9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

Dependencies

Impacts

Risks

Opportunities

### (9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

Yes, withdrawals and discharges

### (9.3.1.7) Country/Area & River basin

**Turkey**

Other, please specify :Ceyhan

### (9.3.1.8) Latitude

*37.97912*

### (9.3.1.9) Longitude

*38.29615*

### (9.3.1.10) Located in area with water stress



Select from:

No

**(9.3.1.11) Primary power generation source for your electricity generation at this facility**

Select from:

Hydropower

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

0.09

**(9.3.1.14) Comparison of total withdrawals with previous reporting year**

Select from:

About the same

**(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes**

0

**(9.3.1.16) Withdrawals from brackish surface water/seawater**

0

**(9.3.1.17) Withdrawals from groundwater - renewable**

0.09

**(9.3.1.18) Withdrawals from groundwater - non-renewable**

0

**(9.3.1.19) Withdrawals from produced/entrained water**

0

**(9.3.1.20) Withdrawals from third party sources**

0

**(9.3.1.21) Total water discharges at this facility (megaliters)**

0.01

**(9.3.1.22) Comparison of total discharges with previous reporting year**

Select from:

About the same

**(9.3.1.23) Discharges to fresh surface water**

0

**(9.3.1.24) Discharges to brackish surface water/seawater**

0

**(9.3.1.25) Discharges to groundwater**

0

**(9.3.1.26) Discharges to third party destinations**

0.01

**(9.3.1.27) Total water consumption at this facility (megaliters)**

0.09

**(9.3.1.28) Comparison of total consumption with previous reporting year**

Select from:

Higher

**(9.3.1.29) Please explain**

*Location: Adiyaman Energy Source&Type: River Type Hydro Installed Capacity: 7 MW Date of Operation: 2010  
Generation Gross: 28,155 MWh (2023) Capacity Utilization Rate: 45.66%*

**Row 7**

**(9.3.1.1) Facility reference number**

Select from:

Facility 7

**(9.3.1.2) Facility name (optional)**

*Uluabat HEPP*

**(9.3.1.3) Value chain stage**

Select from:

Direct operations

**(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility**

Select all that apply

Dependencies

Impacts

Risks

Opportunities

### (9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

Yes, withdrawals and discharges

### (9.3.1.7) Country/Area & River basin

Turkey

Other, please specify :Susurluk

### (9.3.1.8) Latitude

40.15333

### (9.3.1.9) Longitude

28.72394

### (9.3.1.10) Located in area with water stress

Select from:

Yes

### (9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

Hydropower

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

2.25

### (9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

Much lower

### (9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

### (9.3.1.16) Withdrawals from brackish surface water/seawater

0

### (9.3.1.17) Withdrawals from groundwater - renewable

2.25

### (9.3.1.18) Withdrawals from groundwater - non-renewable

0

**(9.3.1.19) Withdrawals from produced/entrained water**

0

**(9.3.1.20) Withdrawals from third party sources**

0

**(9.3.1.21) Total water discharges at this facility (megaliters)**

0.12

**(9.3.1.22) Comparison of total discharges with previous reporting year**

Select from:

About the same

**(9.3.1.23) Discharges to fresh surface water**

0

**(9.3.1.24) Discharges to brackish surface water/seawater**

0

**(9.3.1.25) Discharges to groundwater**

0

**(9.3.1.26) Discharges to third party destinations**

0.12

**(9.3.1.27) Total water consumption at this facility (megaliters)**

2.13

**(9.3.1.28) Comparison of total consumption with previous reporting year**

Select from:

Much lower

**(9.3.1.29) Please explain**

*Location: Bursa Energy Source&Type: Reservoir Hydro Installed Capacity: 100 MW Date of Operation: 2010 Generation Gross: 306,796 MWh (2023) Capacity Utilization Rate: 34.90% • Uluabat is the largest Hydro Electric Power Plant in our diversified portfolio • With a length of 11.461 m, it has the longest force tunnel opened from one side in Turkey • With +/- 20 MW SFC reserve capacity*

**Row 8**

**(9.3.1.1) Facility reference number**

Select from:

Facility 8

### (9.3.1.2) Facility name (optional)

Erzin NGCCPP

### (9.3.1.3) Value chain stage

Select from:

Direct operations

### (9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

Dependencies

Impacts

Risks

Opportunities

### (9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

Yes, withdrawals and discharges

### (9.3.1.7) Country/Area & River basin

**Turkey**

Other, please specify :Erzin NGCCPP does not require a river basin designation, as it does not rely on freshwater from a river basin for its operations. Instead, the plant sources its cooling and process water from the Mediterranean Sea.

### (9.3.1.8) Latitude

36.92839

### (9.3.1.9) Longitude

36.05164

### (9.3.1.10) Located in area with water stress

Select from:

Yes

### (9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

Gas

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

11984.15

**(9.3.1.14) Comparison of total withdrawals with previous reporting year**

Select from:

Lower

**(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes**

0

**(9.3.1.16) Withdrawals from brackish surface water/seawater**

11984.15

**(9.3.1.17) Withdrawals from groundwater - renewable**

0

**(9.3.1.18) Withdrawals from groundwater - non-renewable**

0

**(9.3.1.19) Withdrawals from produced/entrained water**

0

**(9.3.1.20) Withdrawals from third party sources**

0

**(9.3.1.21) Total water discharges at this facility (megaliters)**

10689.97

**(9.3.1.22) Comparison of total discharges with previous reporting year**

Select from:

About the same

**(9.3.1.23) Discharges to fresh surface water**

0

**(9.3.1.24) Discharges to brackish surface water/seawater**

10689.97

**(9.3.1.25) Discharges to groundwater**

0

### (9.3.1.26) Discharges to third party destinations

0

### (9.3.1.27) Total water consumption at this facility (megaliters)

1294.19

### (9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

Much lower

### (9.3.1.29) Please explain

*Location: Hatay Energy Source: Natural Gas Installed Capacity: 904 MW Date of Operation: 2014 Generation Gross: 3,301,556 MWh (2023) Capacity Utilization Rate: 41.76% • Erzin is the largest investment & installed capacity of Akenerji • Designed to be eco-friendly, with an annual generation capacity of 7.4 billion kWh of electricity • A flexible source for auxiliary services such as SFC, 0-1 code, and capacity mechanism • 8.5 mio USD (IAS 29 applied) capacity mechanism revenue in 2023 • With +/- 240 MW SFC reserve capacity, Erzin is in the first place in the market • Erzin is a base load power plant that can provide a continuous supply of electricity throughout the year • One of the most efficient power plant in Turkey with a desirable coastal location and proximity to Botaş Pipeline • Long Term Service is signed with GE for maintenance services • During 2023, 100 % of gas was supplied from BOTAŞ*

## Row 9

### (9.3.1.1) Facility reference number

Select from:

Facility 9

### (9.3.1.2) Facility name (optional)

Ayyıldız WPP

### (9.3.1.3) Value chain stage

Select from:

Direct operations

### (9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

Dependencies

Impacts

Risks

Opportunities

### (9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

Yes, withdrawals and discharges

### **(9.3.1.7) Country/Area & River basin**

#### **Turkey**

Other, please specify :The Ayyıldız Wind Power Plant (WPP) is located in the Eastern Black Sea Basin. While it does not rely on water resources from the basin, geographically it falls within the boundaries of this river basin.

### **(9.3.1.8) Latitude**

40.35647

### **(9.3.1.9) Longitude**

27.89369

### **(9.3.1.10) Located in area with water stress**

Select from:

Yes

### **(9.3.1.11) Primary power generation source for your electricity generation at this facility**

Select from:

Wind

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

0.01

### **(9.3.1.14) Comparison of total withdrawals with previous reporting year**

Select from:

About the same

### **(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes**

0

### **(9.3.1.16) Withdrawals from brackish surface water/seawater**

0

### **(9.3.1.17) Withdrawals from groundwater - renewable**

0.09

### **(9.3.1.18) Withdrawals from groundwater - non-renewable**

0



**(9.3.1.19) Withdrawals from produced/entrained water**

0

**(9.3.1.20) Withdrawals from third party sources**

0

**(9.3.1.21) Total water discharges at this facility (megaliters)**

0.03

**(9.3.1.22) Comparison of total discharges with previous reporting year**

Select from:

About the same

**(9.3.1.23) Discharges to fresh surface water**

0

**(9.3.1.24) Discharges to brackish surface water/seawater**

0

**(9.3.1.25) Discharges to groundwater**

0

**(9.3.1.26) Discharges to third party destinations**

0.03

**(9.3.1.27) Total water consumption at this facility (megaliters)**

0.06

**(9.3.1.28) Comparison of total consumption with previous reporting year**

Select from:

Much higher

**(9.3.1.29) Please explain**

*Location: Balıkesir Energy Source: Wind Date of Operation: 2009 Installed Capacity: 28.20 MW Generation Gross: 86,427 MWh (2023) Capacity Utilization Rate: 35.01% • Additional capacity expansion of 6.2 MW, which will raise the capacity of Ayyıldız Wind Power Plant to 34.4 MW in 2024.*

[Add row]

**(9.3.2) For the facilities in your direct operations referenced in 9.3.1, what proportion of water accounting data has been third party verified?**

## Water withdrawals – total volumes

### (9.3.2.1) % verified

Select from:

76-100

### (9.3.2.2) Verification standard used

ISO14046:2014

## Water withdrawals – volume by source

### (9.3.2.1) % verified

Select from:

76-100

### (9.3.2.2) Verification standard used

ISO14046:2014

## Water withdrawals – quality by standard water quality parameters

### (9.3.2.1) % verified

Select from:

76-100

### (9.3.2.2) Verification standard used

ISO14046:2014

## Water discharges – total volumes

### (9.3.2.1) % verified

Select from:

76-100

### (9.3.2.2) Verification standard used

ISO14046:2014

## Water discharges – volume by destination

### (9.3.2.1) % verified

Select from:

76-100

### (9.3.2.2) Verification standard used

## Water discharges – volume by final treatment level

### (9.3.2.1) % verified

Select from:

76-100

### (9.3.2.2) Verification standard used

ISO14046:2014

## Water discharges – quality by standard water quality parameters

### (9.3.2.1) % verified

Select from:

76-100

### (9.3.2.2) Verification standard used

ISO14046:2014

## Water consumption – total volume

### (9.3.2.1) % verified

Select from:

76-100

### (9.3.2.2) Verification standard used

ISO14046:2014

[Fixed row]

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

### (9.5.1) Revenue (currency)

1

### (9.5.2) Total water withdrawal efficiency

0.00

### (9.5.3) Anticipated forward trend

*The reverse osmosis system used in Erzin CCGT, which accounts for 99% of the water footprint of Akenerji power generation facilities, ensures water recovery and more efficient use of water resources. In addition to resource*

efficiency, the reverse osmosis method used is planned to prevent loss of revenue by providing less maintenance and breakdowns, uninterrupted production and directly increase profitability.

[Fixed row]

## **(9.7.1) Provide the following intensity information associated with your electricity generation activities.**

### **Row 1**

#### **(9.7.1.1) Water intensity value (m3/denominator)**

0.31

#### **(9.7.1.2) Numerator: water aspect**

Select from:

Total water consumption

#### **(9.7.1.3) Denominator**

Select from:

Other, please specify :Gross electricity generation (GWh)

#### **(9.7.1.4) Comparison with previous reporting year**

Select from:

Much lower

#### **(9.7.1.5) Please explain**

*Based on our total water consumption intensity, the value was 0.53 Megaliters/GWh for 2021 and 0.52 Megaliters/GWh for 2022. In 2023, total water consumption was 1304.03 megaliters, while total gross electricity generation reached 4202.45 GWh, resulting in a significantly lower intensity value of approximately 0.31 Megaliters/GWh. This 40% reduction can be attributed to improvements in water efficiency and optimizations in our operations, as well as the maintenance activities and downtime at our Erzin NGCCPP, which led to lower water consumption while still allowing for substantial electricity generation.*

### **Row 2**

#### **(9.7.1.1) Water intensity value (m3/denominator)**

2.85

#### **(9.7.1.2) Numerator: water aspect**

Select from:

Total water withdrawals

#### **(9.7.1.3) Denominator**

Select from:

Other, please specify :Gross electricity generation (GWh)

#### (9.7.1.4) Comparison with previous reporting year

Select from:

Lower

#### (9.7.1.5) Please explain

*Based on our total water withdrawal intensity, the value was 3.07 Megaliters/GWh for 2021 and 3.28 Megaliters/GWh for 2022. In 2023, this intensity dropped to 2.85 Megaliters/GWh, marking approximately 13% reduction. This decrease can be attributed to our operational optimizations and enhanced water management practices across our facilities. Additionally, the maintenance activities and downtime at our Erzin plant contributed to this decline, as these factors resulted in lower water withdrawal while still maintaining efficient electricity generation levels.*

### Row 3

#### (9.7.1.1) Water intensity value (m3/denominator)

2.54

#### (9.7.1.2) Numerator: water aspect

Select from:

Other, please specify :Total water discharge

#### (9.7.1.3) Denominator

Select from:

Other, please specify :Gross electricity generation (GWh)

#### (9.7.1.4) Comparison with previous reporting year

Select from:

Lower

#### (9.7.1.5) Please explain

*Based on our total water discharge intensity, the value was 2.54 Megaliters/GWh for 2021 and 2.76 Megaliters/GWh for 2022. In 2023, this value decreased by approximately 8%, bringing the intensity back to 2.54 Megaliters/GWh. This reduction can be attributed to improved water recycling and reuse practices implemented across our facilities, alongside operational optimizations. Additionally, maintenance activities and downtime at the Erzin plant further contributed to the lower discharge levels, allowing us to reduce overall water discharge while maintaining efficient electricity production.*

[Add row]

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

	Products contain hazardous substances	Comment
	Select from: <input checked="" type="checkbox"/> No	Akenerji generates electricity, which is inherently free of hazardous substances.

[Fixed row]

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

### (9.14.1) Products and/or services classified as low water impact

Select from:

Yes

### (9.14.2) Definition used to classify low water impact

*In HEPP's; potential energy of water is transformed into mechanical energy and this process electricity generates. Water withdrawals in all HEPPs are used only for domestic use (cooking, WC, etc., garden irrigation).*

### (9.14.4) Please explain

*in HEPPs we do not need quality data, because we use only the potential energy of water is transformed to mechanical energy so they are having a lower detrimental impact on water resources, water quality and ecosystems.*

[Fixed row]

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

### Water pollution

#### (9.15.1.1) Target set in this category

Select from:

No, but we plan to within the next two years

#### (9.15.1.2) Please explain

*In 2023, while we do not have specific targets set for reducing water pollution, we recognize the importance of water management in sustaining our natural resources and ensuring the health of our ecosystems. We are actively working to enhance our environmental objectives, particularly those related to water. We plan to develop and implement comprehensive water-related targets within next two years. These will focus on reducing potential impacts on water quality, increasing our water use efficiency, and strengthening our overall water management practices.*

### Water withdrawals

### (9.15.1.1) Target set in this category

Select from:

Yes

### Water, Sanitation, and Hygiene (WASH) services

### (9.15.1.1) Target set in this category

Select from:

No, but we plan to within the next two years

### (9.15.1.2) Please explain

*At Akenerji, while we consistently maintain high standards of health, safety, and environmental care, we currently do not have specific targets set for WASH initiatives for the year 2023. This decision is based on our ongoing evaluation of strategic priorities and resource management. Recognizing the important role of WASH principles in ensuring the well-being of our employees and the communities around us, we plan to revisit and potentially incorporate WASH-related objectives into our future sustainability plans within next two years. Our aim is to enhance our efforts to support access to clean water and sanitation, contributing positively to community health and environmental quality.*

### Other

### (9.15.1.1) Target set in this category

Select from:

No, but we plan to within the next two years

### (9.15.1.2) Please explain

*In 2023, Akenerji continues to refine and implement the strategic planning and targets outlined in our Corporate Sustainability Management handbook established in 2021. Building upon our commitment to the United Nations Sustainable Development Goals, we remain focused on producing energy for a better life, integrating SDG 6 into our business operations. Over the next two years, we will comprehensively evaluate and define all our water-related goals to ensure a broader and more impactful approach to sustainable water management.*  
[Fixed row]

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

### Row 1

### (9.15.2.1) Target reference number

Select from:

Target 1

### (9.15.2.2) Target coverage

Select from:

Organization-wide (direct operations only)

### (9.15.2.3) Category of target & Quantitative metric

#### Water withdrawals

Other water withdrawals, please specify :Reduction in water consumption (megaliters/year)

### (9.15.2.4) Date target was set

12/30/2023

### (9.15.2.5) End date of base year

12/30/2021

### (9.15.2.6) Base year figure

2725.73

### (9.15.2.7) End date of target year

12/30/2025

### (9.15.2.8) Target year figure

2453.16

### (9.15.2.9) Reporting year figure

1304.03

### (9.15.2.10) Target status in reporting year

Select from:

New

### (9.15.2.11) % of target achieved relative to base year

522

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

Select all that apply

Sustainable Development Goal 6

### (9.15.2.13) Explain target coverage and identify any exclusions

*Our water consumption reduction target applies to all Akenerji facilities, including 7 hydroelectric power plants, a wind power plant, Erzin Natural Gas Combined Cycle Power Plant, and our head office. This comprehensive approach ensures that water management strategies are implemented across our entire operations.*

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



To achieve our water consumption reduction target, Akenerji has implemented a multi-step plan focused on optimizing water use across all facilities, particularly in high-consumption areas like the Erzin NGCCPP. We have enhanced our water monitoring systems to track usage in real-time, allowing for immediate adjustments and more efficient water use across our facilities. This also includes tracking water quality and ensuring compliance with environmental standards. Additionally, we are implementing water efficiency training for employees across all facilities to foster a culture of conservation and ensure that best practices for reducing water use are applied consistently.

#### **(9.15.2.16) Further details of target**

*In 2023, water management emerged as one of the top priorities in our Materiality Matrix, based on the results of our stakeholder survey. Our objective is to reduce total water consumption across all our facilities, including our head office. We have set 2021 as the reference year and aim to achieve a reduction of approximately 10% by the end of 2025. The significant decrease in water consumption during the reporting year is primarily due to reduced operations at our Erzin plant, which accounts for the majority of our total consumption. Maintenance activities and downtimes in 2023 led to lower operational output at the plant, resulting in a notable reduction in water usage compared to previous years.*

*[Add row]*

## C10. Environmental performance - Plastics

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

	Targets in place
	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

## C11. Environmental performance - Biodiversity

**(11.2) What actions has your organization taken in the reporting year to progress your biodiversity-related commitments?**

	Actions taken in the reporting period to progress your biodiversity-related commitments
	<p>Select from:</p> <p><input checked="" type="checkbox"/> No, we are not taking any actions to progress our biodiversity-related commitments, but we plan to within the next two years</p>

[Fixed row]

**(11.3) Does your organization use biodiversity indicators to monitor performance across its activities?**

	Does your organization use indicators to monitor biodiversity performance?	Indicators used to monitor biodiversity performance
	<p>Select from:</p> <p><input checked="" type="checkbox"/> Yes, we use indicators</p>	<p>Select all that apply</p> <p><input checked="" type="checkbox"/> Other, please specify :monitoring with experts who prepares reports</p>

[Fixed row]

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

### Legally protected areas

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

Select from:

No

### (11.4.2) Comment

*Akenerji does not operate in close proximity to protected or sensitive areas important for biodiversity. Distances determined in line with both national and international requirements are maintained and this is documented by ESIA and independent analysis reports. Our Company carries out its activities in an environmentally sensitive manner and takes all kinds of measures to protect biodiversity. Akenerji complies with Turkey's national biodiversity protection laws and international protection requirements, and carries out its activities at a safe*

distance from areas important for biodiversity. Although our Company does not have any activities in sensitive areas in the specified category, it constantly monitors all its operations for the protection of species and ecosystems beyond the legislation and requirements.

## UNESCO World Heritage sites

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

Select from:

No

### **(11.4.2) Comment**

*Akenerji does not operate in close proximity to protected or sensitive areas important for biodiversity. Distances determined in line with both national and international requirements are maintained and this is documented by ESIA and independent analysis reports. Our Company carries out its activities in an environmentally sensitive manner and takes all kinds of measures to protect biodiversity. Akenerji complies with Turkey's national biodiversity protection laws and international protection requirements, and carries out its activities at a safe distance from areas important for biodiversity. Although our Company does not have any activities in sensitive areas in the specified category, it constantly monitors all its operations for the protection of species and ecosystems beyond the legislation and requirements.*

## UNESCO Man and the Biosphere Reserves

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

Select from:

No

### **(11.4.2) Comment**

*Akenerji does not operate in close proximity to protected or sensitive areas important for biodiversity. Distances determined in line with both national and international requirements are maintained and this is documented by ESIA and independent analysis reports. Our Company carries out its activities in an environmentally sensitive manner and takes all kinds of measures to protect biodiversity. Akenerji complies with Turkey's national biodiversity protection laws and international protection requirements, and carries out its activities at a safe distance from areas important for biodiversity. Although our Company does not have any activities in sensitive areas in the specified category, it constantly monitors all its operations for the protection of species and ecosystems beyond the legislation and requirements.*

## Ramsar sites

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

Select from:

No

### **(11.4.2) Comment**

*Akenerji does not operate in close proximity to protected or sensitive areas important for biodiversity. Distances determined in line with both national and international requirements are maintained and this is documented by ESIA and independent analysis reports. Our Company carries out its activities in an environmentally sensitive manner and takes all kinds of measures to protect biodiversity.*

## **Key Biodiversity Areas**

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

Select from:

No

### **(11.4.2) Comment**

*Akenerji does not operate in close proximity to protected or sensitive areas important for biodiversity. Distances determined in line with both national and international requirements are maintained and this is documented by ESIA and independent analysis reports. Our Company carries out its activities in an environmentally sensitive manner and takes all kinds of measures to protect biodiversity. Akenerji complies with Turkey's national biodiversity protection laws and international protection requirements, and carries out its activities at a safe distance from areas important for biodiversity. Although our Company does not have any activities in sensitive areas in the specified category, it constantly monitors all its operations for the protection of species and ecosystems beyond the legislation and requirements.*

## **Other areas important for biodiversity**

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

Select from:

No

### **(11.4.2) Comment**

*Akenerji does not operate in close proximity to protected or sensitive areas important for biodiversity. Distances determined in line with both national and international requirements are maintained and this is documented by ESIA and independent analysis reports. Our Company carries out its activities in an environmentally sensitive manner and takes all kinds of measures to protect biodiversity. Akenerji complies with Turkey's national biodiversity protection laws and international protection requirements, and carries out its activities at a safe distance from areas important for biodiversity. Although our Company does not have any activities in sensitive areas in the specified category, it constantly monitors all its operations for the protection of species and ecosystems beyond the legislation and requirements.*

[Fixed 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: <input checked="" type="checkbox"/> 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
- Water

#### (13.1.1.2) Disclosure module and data verified and/or assured

##### Environmental performance – Water security

- All data points in module 9 destination
- Water discharges – volumes by destination
- Water consumption– total volume treatment method
- Water discharges – volumes by treatment method
- Water discharges– total volumes
- Water withdrawals– total volumes
- Water withdrawals – volumes by source

#### (13.1.1.3) Verification/assurance standard

##### Water-related standards

- Other water verification standard, please specify :ISO 14046:2014

##### Climate change-related standards

- ISO 14064-1
- ISO 14064-3

Other climate change verification standard, please specify :GHG Protocol

#### (13.1.1.4) Further details of the third-party verification/assurance process

*Integrated reporting*

#### (13.1.1.5) Attach verification/assurance evidence/report (optional)

*GHG Verification Statement (GHG Protocol and 14064-3)\_2023.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

*Annual Integrated Report TCFD and TNFD Assessment Documents GHG Verificaiton Statements ISO 14064-3 Verification Report ISO 14046:2014 Verification Statment Akenerji Investor Presentation 2023*  
[Fixed row]

**(13.3) Provide the following information for the person that has signed off (approved) your CDP response.**

#### (13.3.1) Job title

*Sustainability Manager*

#### (13.3.2) Corresponding job category

*Select from:*

Environment/Sustainability manager  
[Fixed row]

