# AKENERJİ ELEKTRİK ÜRETİM A.Ş. - Climate Change 2020



C0. Introduction

# C0.1

#### (C0.1) Give a general description and introduction to your organization.

Our company started its energy activities in 1989 affiliated with Akkök Group of Companies. Akenerji, which has been operating as a free electricity production company since 2005, became one of the leading companies in Turkey's energy sector as of the end of 2019. Akenerji, which is an example in the energy sector with more than 31 years of knowledge, with 1 natural gas combined cycle, 1 wind power plant and 7 hydroelectric power plants has created portfolio diversity in terms of source and geography. As of the end of 2019, 26% of our installed power, which is 1,224 MW, consists of renewable energy sources. All our active plants are administratively operating under the Production Directorate under the name of Akenerji Elektrik Üretim A.Ş., depending on Operations and Maintenance. All our plants except for Erzin Power Plant carry out electricity generation activities from renewable energy sources.

Akenerji's Sustainability Approach:

Every year, sustainability is integrated into increasing number of decision making mechanisms within the company. As a tool for managing and maintaining the efforts to reach sustainability, Akenerji gives importance to monitor quality performance in its services together with stakeholder engagement performance.

As a part of monitoring the environmental sustainability performance, Akenerji launched the "Carbon Management Project" which includes regular monitoring of the company's GHG emissions. GHG inventory of Erzin Natural Gas Power Plant is monitored, reported and verified in ISO 14064 standard since 2016.

We benefit from a variety of dialogue platforms to learn about the sustainability expectations of our stakeholders including employees, customers, creditors, investors, regulatory bodies, suppliers, local communities, local authorities, society, and media as well as to give them information on these issues. The communication channels are integrated management systems, "We Are the Energy" Employee Suggestion System, Customer satisfaction surveys, Environmental Impact Assessment (EIA) reports, workshops/events etc. Moreover, Akenerji participates to CDP Climate Change program since 2010; prepares annual Environmental & OHS reports since 2010; and submits IFC Annual Environmental and Social Performance Monitoring Reports since 2010. As a part of our communication channels with our stakeholders, we also benefit from sustainability reports. Sustainability Report has been prepared in accordance with the GRI Standards: Core option principles taking United Nations Sustainable Development Goals into account. Since 2010, Akenerji has received certification for ISO 9001:2015 Quality, OHSAS 18001:2007 Occupational Health and Safety and the ISO 14001: 2015 Environment Management Systems. After abolishment of OHSAS 18001: 2007 standard and enactment of ISO 45001: 2018 standard, the revision efforts in the occupational health and safety management system have been initiated. ISO 50001:2018 Energy Management System studies have been started in all our power plants, energy consumption has been determined and targets have been determined to reduce consumption and make improvements by evaluating performance

We have been listed on "BIST Sustainability Index" which lists the companies that are traded at Borsa İstanbul and that have highest corporate sustainability performance ratings.

Moreover, as of 2015, CDP Water Program has been initiated in our country. We have been among the pioneer companies that started to report to the program in its initial year and conveyed our water management system. Carbon Disclosure Project (CDP) Turkey 2017 Water Leadership Award granted to us as the result of the steps we have taken as Akenerji about water.

# C0.2

(C0.2) State the start and end date of the year for which you are reporting data.

	Start date	End date	Indicate if you are providing emissions data for past reporting	Select the number of past reporting years you will be providing emissions data
			years	for
Reporting	January 1	December 31	Yes	3 years
year	2019	2019		

# C0.3

## (C0.3) Select the countries/areas for which you will be supplying data. Turkey

## C0.4

# C0.5

(C0.5) Select the option that describes the reporting boundary for which climate-related impacts on your business are being reported. Note that this option should align with your chosen approach for consolidating your GHG inventory. Operational control

# C-EU0.7

(C-EU0.7) Which part of the electric utilities value chain does your organization operate in? Select all that apply.

#### Row 1

Electric utilities value chain Electricity generation

Other divisions Please select

# C1. Governance

# C1.1

(C1.1) Is there board-level oversight of climate-related issues within your organization? Yes

# C1.1a

(C1.1a) Identify the position(s) (do not include any names) of the individual(s) on the board with responsibility for climate-related issues.

Position of	Please explain
individual(s)	
	Board or individual/sub-set of the Board or other committee appointed by the Board Internal and external communication of sustainability performance is carried out through annual environmental and social performance monitoring reports for creditors, and management systems and annual sustainability reports, and they are reported to the Board of Directors via the Executive Board.

# C1.1b

# (C1.1b) Provide further details on the board's oversight of climate-related issues.

	Governance mechanisms into which climate- related issues are integrated	board- level	Please explain
Scheduled – some meetings	Reviewing and guiding strategy Reviewing and guiding major plans of action Reviewing and guiding risk management policies Reviewing and guiding annual budgets Reviewing and guiding business plans Setting performance objectives Monitoring implementation and performance of objectives Overseeing major capital expenditures, acquisitions and divestitures Monitoring and verseeing progress against goals and targets for addressing climate-related issues		The management of the environmental and social elements in our operating power plants is under the responsibility of the Directorate of Environment, Quality, Occupational Health and Safety under Production Deputy Directorate General. The units responsible for the project undertake the management of the OSG and environmental auting the period from the projecting phase to the commissioning of the plants. Key environmental and social performance data on our plants and project sites are reported to the Board of Directors. In addition, annual or periodic environmental and social performance data on our plants and project sites are reported to the Board of Directors. In addition, annual or periodic environmental and social performance data on our plants and project sites are reported to the Board of Directors. In addition, annual or periodic environmental and social performance data on our plants and project sites are reported to the Board of Directors through the Executive Board.

# C1.2

(C1.2) Provide the highest management-level position(s) or committee(s) with responsibility for climate-related issues.

Name of the position(s) and/or committee(s)	Reporting line		-	Frequency of reporting to the board on climate- related issues
Risk committee	<not Applicable&gt;</not 	Both assessing and managing climate-related risks and opportunities	<not applicable=""></not>	More frequently than quarterly
Sustainability committee	<not Applicable&gt;</not 	Both assessing and managing climate-related risks and opportunities	<not applicable=""></not>	Annually
Safety, Health, Environment and Quality committee	<not Applicable&gt;</not 	Both assessing and managing climate-related risks and opportunities	<not applicable=""></not>	More frequently than quarterly
Other, please specify (The Early Detection of Risk Committee)	<not Applicable&gt;</not 	Managing climate-related risks and opportunities	<not applicable=""></not>	More frequently than quarterly

C1.2a

(C1.2a) Describe where in the organizational structure this/these position(s) and/or committees lie, what their associated responsibilities are, and how climaterelated issues are monitored (do not include the names of individuals).

Akenerji has a holistic approach to sustainability, which integrates the environmental, economic and social dimensions of sustainability through the support of various departments. The ultimate responsibility is given to the highest level of decision making authority, and it is the board of directors.

In order to manage and report sustainability efforts and achievements in a more holistic manner, a Sustainability Committee was established within Akenerji in 2013. The business units represented at the Sustainability Committee are as follows:

- Health, Safety, Environment and Quality (Leader)
- Accounting and Tax Management
- Corporate Communications
- Energy Services
- Trade
- Natural Gas Supply and Trading
- Human Resources
- Legal Affairs
- Procurement
- Projects
- Strategic Planning and Risk Management

All climate change-related efforts and achievements at Akenerji are reported to the CEO. To manage these efforts, Akenerji has a Quality Project Team under the lead of the Health, Safety, Environment and Quality (HSEQ) department. The Quality Project Team consists of 11 employees including environmental engineers, health & safety specialists, and engineers and operators from the power plants.

The Quality Project Team has regular meetings to check the status of our efforts under ISO 9001 (Quality), ISO 14001 (Environment) and OHSAS 18001 / ISO 45001 (Health and Safety), and ISO 14064-1 Verification to ensure compliance with applicable environmental, health and safety regulations, to make gap analysis, and to plan for continuous improvements.

Our internal auditors were selected to have at least one person from each department, and they have been trained by an external consultancy firm to in order to improve and maintain HSEQ management systems. All departments accept responsibility for climate change and involve the risks and opportunities in their decision making processes, embed them into their sustainability targets. The coordination of efforts for dealing with the risk and opportunities of climate change are coordinated by the Health, Safety, Environment and Quality (HSEQ) department. In addition to internal trainings, to increase the number of our internal auditors and enlarge the internal audit team,

In our operating power plants, the Directorates of Health, Safety, Environment and Quality, that operate under the function of the Power Generation Directorate are responsible for the management of environmental sustainability efforts. Directorate of Health, Safety, Environment and Quality is responsible for the OHS and environmental performance throughout the process starting with project phase until the full operation of plants.

Internal and external communication of sustainability performance is carried out through annual environmental and social performance monitoring reports for creditors, and management systems and annual sustainability reports, and they are reported to the Board of Directors via the Executive Board.

In addition to the Sustainability Committee; the risks and opportunities are also evaluated and managed by The Early Detection of Risk Committee: The Committee was established under the supervision of the Akenerji Board of Directors. Members are appointed by the Board of Directors in accordance with the related legislation provisions. The Committee ensures that appropriate risk management processes and capabilities are in place in order to timely identify the risks which may danger the Company's existence, development and continuity, and does studies for to apply necessary preventive actions and to manage risks. The Early Detection of Risk Committee convenes bimonthly and reports to the Board of Directors. Members are appointed by the Board of Directors in accordance with the related legislation provisions.

Risk Management Committee, while the risks are managed within the Framework of ERM, the Risk Management Committee was established to take quicker decisions and take immediate actions due to the changing conditions. The Committee members are composed of the General Manager, Deputy General Manager, Directors and Strategic Planning and Risk Manager. The Committee convenes on a monthly basis, and it is ensured that the necessary actions are taken by discussing the risks that the Company incurs/may incurs.

# C1.3

(C1.3) Do you provide incentives for the management of climate-related issues, including the attainment of targets?

 Provide incentives for the management of climate-related issues
 Comment

 Row 1
 Yes
 Comment

(C1.3a) Provide further details on the incentives provided for the management of climate-related issues (do not include the names of individuals).

Entitled to incentive		Activity inventivized	Comment
Board/Executive board	Non- monetary reward	Behavior change related indicator	Board of Directors has the ultimate responsibility about the overall sustainability performance of Akenerji. The pioneer role of Akenerji in Turkish energy sector could be realized with the vision of the Board.
manager reward specify performance, (Emissions reduction project, Emissions reduction target, Energy reduction target, Eff		A performance based compensation is available for HSEQ Department staff based on the pre-determined targets. In terms of carbon management performance, (Emissions reduction project, Emissions reduction target, Energy reduction target, Efficiency target, Behavior change related indicator) Carbon Management Project is one of the key considerations for bonus determination for the Health, Safety, Environment and Quality (HSEQ) Manager and environmental engineer in the HSEQ Department.	
All employees	Monetary reward	Other (please specify) (Projects)	All employees have personal performance indicators as well and are rewarded when they reached the target. All employees can suggest improvements to reduce the environmental footprint of the company through filling out questionnaires to be submitted to their supervisors and to HSEQ directly. There is an opportunity for the employees especially for the ones working at the power plants to receive monetary reward, in case their suggestions are considered to have a significant improvement in the company's environmental performance, and are implemented following the evaluation. Projects are about Emissions reduction, Energy reduction, Efficiency .
		specify) (Energy reduction and Efficiency	Board of Directors has the ultimate responsibility about the overall performance of Akenerji and bonus is delivered inline with the achievements of the targets at the year end. Particularly, achievement of energy reduction target and increase of efficiency are of important targets for the Board.
manager monetary change efficiency. Beyond achievement of KPIs and monetary rewards; recognition among Akenerji, Akkök		HSEQ Manager leads the Sustainability Team of Akenerji and encourages all employees for reduction of emissions, energy used and improvement of efficiency. Beyond achievement of KPIs and monetary rewards; recognition among Akenerji, Akkök Group, ČEZ Group, Turkish energy sector, and energy sector, and worldwide via energy, emission, sustainability dimensions have great importance especially for Environment & Sustainability Managers.	

# C2. Risks and opportunities

# C2.1

(C2.1) Does your organization have a process for identifying, assessing, and responding to climate-related risks and opportunities? Yes

# C2.1a

(C2.1a) How does your organization define short-, medium- and long-term time horizons?

	From (years)	To (years)	Comment
Short-term	0	2	Short term is 0-2 years
Medium-term	2	5	Medium-term is 2-5 years
Long-term	5	20	Long-term is 5-20 years

# C2.1b

#### (C2.1b) How does your organization define substantive financial or strategic impact on your business?

#### 1 Evaluation of Risks

Risks are evaluated based on certain assumptions and criteria; and risk levels are determined. Opportunities, if any, are also analyzed based on a cost-benefit analysis.

Unit Risk Responsible, in coordination with unit personnel, evaluates risks in two stages;

## 1. Gross (Inherent) Risk Evaluation:

## 2. Net (Residual) Risk Evaluation:

Following are the important sections that must be filled under "Gross (Inherent) Risk Evaluation" and "Net (Residual) Risk Evaluation" in the Risk Register

#### Impact

Each risk may have one or more type of impact. In that respect Akenerji risks are categorized under five headings;

- · Reputation risks
- · Compliance risks
- · Strategic risks
- · Operational risks
- · Financial risks

Risk categorization tables in Annex 3 determine which category(ies) a risk belongs to. Scoring for each risk category is done according to the criteria given in Annex 2, using a 5-scale scoring table.

In case a risk impacts more than one category, the highest impact score is taken into consideration while calculating risk level.

# Likelihood

Mathematical value of the probability that a risk may occur. Scoring for Likelihood is done according to the criteria given in Annex 1, using a 5-scale scoring table.

#### **Risk Level**

A number that is the product of Impact and Likelihood values

Impact X Likelihood = Risk Level

### Base (notes) for Calculation

Assumptions used in risk impact and likelihood evaluation, examples and scenarios are explained under this section in the Risk Register.

#### **Existing Controls**

Existing Controls are risk-mitigating activities. All existing risk-mitigating controls for each Akenerji risk are identified and documented in the Risk Register. These may be business processes, procedures, systems, programs, physical infrastructure, trainings, etc.

#### Cost of Risk

Cost of risk is the amount of financial loss that Akenerji bears in case a risk occurs. Not all risks leads to financial loss.

Risk Level are identified according to the risk scores. Risks with score higher than 15 are considered as substantive and for these riskss action plans are carried out.

#### (C2.2) Describe your process(es) for identifying, assessing and responding to climate-related risks and opportunities.

Value chain stage(s) covered Direct operations

## **Risk management process**

Integrated into multi-disciplinary company-wide risk management process

# Frequency of assessment

More than once a year

# Time horizon(s) covered

Short-term Medium-term Long-term

# **Description of process**

Akenerji's ERM process provides a systematic method for effective decision-making and timely response as soon as risks arise including climate-related risks, while establishing the context for risk detection, evaluation, response, reporting and monitoring of risks and opportunities. Akenerji's risk maps are based on each business unit's risk register. These risk registers are reviewed and updated in line within the framework of the ERM process and under the supervision of Business Unit Risk Responsibles. Akenerji ERM scope and framework were established based on the risk appetite and tolerance in analyzing and managing risks coherent with company's targets and business segment; risk assessment criteria; risk categories and the ERM strategy. Following are taken into consideration while identifying circumstances that may negatively impact company activities: • Company's main business operations • Strategic goals • Physical environment • Corporate culture • Employees • Past experiences (losses or failures) • External factors • Findings of audits, etc. Risks that are identified in the previous stage are evaluated based on certain assumptions and criteria; and risk levels are determined. Opportunities, if any, are also analyzed based on a cost-benefit analysis. BoD determines what type of risk response should be used by choosing among 5 different response types below, while taking into account the root causes, net risk level and Akenerji risk appetite; • Accept: Accepting the risk at its existing level • Avoid: Avoiding the risk by quitting/freezing the activities that expose the company to the risk • Mitigate: Implementing policies/procedures and risk mitigating controls in order to lower the risk to an acceptable level • Transfer: Transfer the risk or the activities that expose the company to the risk to a third party An action plan is designed for each risk response (avoid, mitigate, transfer) other than "Accept." Within the action plan; • Describe action: Action plans, in general, are designed by Unit Risk Responsibles and undertaken by the Risk Owner. However, some risks may require RMC's intervention. Also, RMC's contribution is expected when designing action plans for high-level risks. Scope of RMC's contribution to action plan is determined by the level of the relevant risk and based on the table below. It is considered that Akenerji ERM process is an effective program that meets relevant needs; existiting ERM competencies are improved. Improvement and effectiveness of risk treatment strategies are evaluated and risks are periodically reported.

#### (C2.2a) Which risk types are considered in your organization's climate-related risk assessments?

	Relevance	Please explain
	& inclusion	
Current regulation	Relevant, always included	Climate-related regulatory risks are included in Akenerji's ERM system. For example carbon emissions, which are the leading cause of global climate change. The Regulation Concerning Monitoring of Greenhouse Gas Emissions was issued by the Turkish Ministry of Environment and Urbanism (MoEU) and published in the Official Gazette on 25 April 2012. It is generally based on the United Nations Framework Convention on Climate Change and the Kyoto Protocol. The purpose of the Regulation is to set forth the principles and procedures for monitoring and reporting of greenhouse gases (GHG) arising from the facilities performing the activities listed in Annex 1 of the Regulation. Akenerji's natural gas CCGT power plant "Erzin" with 904 MW of installed capacity is subject to the Regulation as per Annex 1. Pursuant to Article 6 of the Regulation, operators of the Facilities shall monitor the GHG arising from their Facilities according to the principles set forth in the Regulation. And shall prepare a GHG monitoring plan for this purpose. The operators of the Facilities shall submit their monitoring plan to the Ministry of Environment for approval and registration. Furthermore, as per Article 7 of the Regulation, beoperators of such Facilities shall submit an annual GHG report prepared in accordance with the monitoring plan to the MoEU for the GHG emission observed in the previous calendar year. Both the GHG monitoring plans and the annual GHG reports shall be verified by accredited verification institutions before their submission to the MoEU. The "Greenhouse Gas Bonitoring Plan" for the Erzin natural gas CCGT that was prepared within the scope of the Regulations was submitted to and approved by the MoEU. Greenhouse gas emission of Erzin power plant has been monitored and reported (verified by accrediters) monthly in conformity with the Greenhouse Gas Monitoring Plan approved by the MoEU. The "Greenhouse gas emission of Erzin power plant has been monitored and reported (verified by accrediters) monthly in conformity with the
Emerging regulation	Relevant, always included	Since the Paris Agreement having entered into force, the global attention is on the implementation. The issue of carbon pricing has gained increased interest as a result of the global agreement. Which is also a subject for Turkey, since Turkey submitted its intended national determined contribution (INDC) in the run-up to the Paris conference pledging intended greenhouse gas (GHG) emissions reductions of up to 21% in 2030 as compared to a business as usual scenario. To support the formulation of Turkey's low carbon development policies, Turkey received a grant from the World Bank Partnership for Market Readiness (PMR). The projects are implemented by the Ministry of Environment and Urbanization (MoEU) through the Climate Change Department (CCD). Ist Phase of the Project completed, and now the project is at the 2nd Phase. Turkey is considering the use of market based instruments such as carbon pricing to reach its climate change mitigation targets as said in the Project's report "Roadmap for the Consideration of Establishment and Operation of a Greenhouse Gas Emissions Trading System in Turkey". Akenerji is closely monitoring the GHG emissions trading system, carbon pricing and other climate-change related regulatory developments through consultation with policy makers, attending related events and workshops, etc. Carbon pricing and such regulatory changes and their impacts on our business are considered in a separate CO2 scenario analysis. The related risk has been defined, assessed, continuously being monitored and reported within the framework of Akenerji ERM process through risk reports.
Technology	Relevant, always included	Akenerji considers technology in assessing especially strategic and operational risks within the Akenerji ERM process. The electric utility industry is a key player in climate change mitigation. Akenerji evaluates the existing technology of its power plants and closely monitor the technological developments in the market when analyzing options to mitigate GHG emissions by increased efficiency, fuel switching, GHG capture, etc. and considers adaptation strategies to changing climate conditions which could affect the power generation capacities of its power plants.
Legal	Relevant, always included	Electric utilities sector in Turkey is regulated by the rules created by government/local authorities which the utility companies must adhere to by law. Akenerji ERM system covers compliance assessment to legal risks arising from Akenerji's activities. There are number of regulative arrangements with regards to climate change related legal and regulatory framework, some are already in force (Regulation on the Monitoring of GHG Emissions, The Energy Efficiency Law No. 5627, etc.) and some in the pipeline/ at design stage. Akenerji strictly compliance with laws and regulations, committed to sustaining a strong management and control systems and strategies, closely follows the developments in regulatory environment and adapts its strategies accordingly.
Market	Relevant, always included	Climate change and therefore the low-carbon policies together with the developments in technology highly effecting the electricity market, the electricity prices, the electricity demand, customer and competitor behaviors. Akenerji considers climate change related market risks in its strategy and business plan. As an example, long-term electricity price forecasting study and strategic plan study is made every year. Scenario analysis made for commodity price, demand and supply forecasting. Climate change related government policies, customer behaviors, technological developments (ex: higher efficiency power plants, etc.) and other risks and/or opportunities are taken into consideration during scenario analysis.
Reputation	Relevant, always included	Climate change results in negative impacts to society in different ways. Reputation risk to Akenerji brand is assessed for any event including climate change related events (physical: flood, drought, etc. and transitional). As an example to mitigate flood risk impact to the society, we prioritize the safety and security of the local populations residing within the impact zones of our operations through awareness raising and preservation. This is an example to the actions we take with intentions to prevent and mitigate the environmental and social risks. Our company is committed to fulfill its responsibilities towards its customers, employees, suppliers and business partners, rivals, and the environment and the society.
Acute physical	Relevant, always included	The climate change is deriving severe weather events such as floods, droughts, temperatures well above the seasonal mean temperatures (heat-waves) etc. These events have a direct impact on Akenerji operations and may result in asset damages, operation cuts, reduced efficiency, etc. Akenerji considers acute physical events in risk assessment. Akenerji manages these risks by; –using tools for weather forecasting to predict hydrology to limit the economic and social damage caused by an increasing frequency and intensity of heavy rains, droughts, etc. –monitoring slope stability at some power plants to be able to mitigate erosion and possible damages to the power plant and/or surrounding environment as a result of heavy rains – managing via diversified energy portfolio (hydro, natural gas, wind PPs in different locations) etc.
Chronic physical	Relevant, always included	Akenerji considers also chronic physical events in risk assessment. For example water scarcity, reduced inflow due to reduced precipitation has negative effects on hydropower generation. Akenerji manages these risks by; –using tools for weather forecasting to predict hydrology to limit the economic loss –use of historical water inflow data, etc. for modelling (forecasting) – managing via diversified energy portfolio (hydro, natural gas, wind PPs in different locations) etc.

# C2.3

(C2.3) Have you identified any inherent climate-related risks with the potential to have a substantive financial or strategic impact on your business? Yes

# C2.3a

(C2.3a) Provide details of risks identified with the potential to have a substantive financial or strategic impact on your business.

# Identifier

Risk 1

Where in the value chain does the risk driver occur? Direct operations

# Risk type & Primary climate-related risk driver

Emerging regulation

Carbon pricing mechanisms

# Primary potential financial impact

Increased indirect (operating) costs

Climate risk type mapped to traditional financial services industry risk classification <Not Applicable>

# Company-specific description

Within the framework of approximation to UNFCCC; Turkey submitted its intended national determined contribution (INDC) in the run-up to the Paris conference pledging intended greenhouse gas (GHG) emissions reductions of up to 21% in 2030 as compared to a business as usual scenario. Two policies can be applied that deliver an

explicit price on GHG emissions: a tax on GHG emissions and emissions trading. Turkey develops national emission reduction plan within the framework of EU-ETS Acquis approximation. If Turkey commits to make mitigation, carbon taxes may be introduced to energy intensive sector at the first attempt and this could adversely affect the operational costs of our thermal power plant. Turkey is also considering the use of market based instruments such as carbon pricing to reach its climate change mitigation targets. An emissions trading system (ETS), sets a limit (or cap) on greenhouse gas (GHG) emissions from installations covered by the system. Installations covered under the ETS need to surrender emissions allowance to cover the total volume of GHG emitted.

Time horizon

Likelihood

Very likely

Magnitude of impact

High

#### Are you able to provide a potential financial impact figure? Yes, an estimated range

Potential financial impact figure (currency) <Not Applicable>

Potential financial impact figure – minimum (currency)

1281093

Potential financial impact figure – maximum (currency) 17914677

## Explanation of financial impact figure

Carbon emission of Erzin natural gas power plant of Akenerji was 1,628,607 tonne CO2e in 2017, and 1,281,093 in 2018, which depends on the annual generation. If it is assumed that a carbon tax of 1 to 11 US\$/tCO2e is introduced to the Turkish market, total tax associated with overall emissions of Akenerji would be around from 1,281,093 to 17,914,677 US\$ for 2017. Therefore, the estimated negative financial impact could be around these values per annum, depending on the price for carbon tax and the annual produced carbon emission.

Cost of response to risk

0

#### Description of response and explanation of cost calculation

Akenerji closely monitors regulatory changes and seeks ways for adaption before any new regulations get into force. Akenerji is evaluating emission reduction possibilities for long term plans. The strategy may involve in (1) implementing higher efficiency gas turbines, (2) phasing out low efficiency/old natural gas power plant, (3) carbon sequestration and storage and/or (4) investing in renewable energy. (5) carbon offsets by Akenerji's renewable power generation

#### Comment

Until to the end of 2017, Akenerji has invested around a total of US\$ 700 mio. in renewable energy production. Akenerji's only thermal power plant of Erzin, which had a total investment cost of US\$ 900 mio., is equiped with high efficiency gas turbines (58%, F type) that is already satsfying European standards. Akenerji shut-down its low-efficiency old natural gas power plants. Currently, Akenerji doesn't have any specific cost for the management of this risk. Akenerji is evaluating the possible emission reduction actions to be taken within the long-term.

## Identifier

Risk 2

#### Where in the value chain does the risk driver occur?

Direct operations

## Risk type & Primary climate-related risk driver

Emerging regulation

Enhanced emissions-reporting obligations

# Primary potential financial impact

Increased direct costs

Climate risk type mapped to traditional financial services industry risk classification <Not Applicable>

#### Company-specific description

Inline with the studies on National regulation regarding GHG emissions; a law put into force about Mandatory Carbon reporting in Turkey. (Turkish Regulation for Monitoring, Reporting and Verification of Greenhouse Gas Emissions – official journal 28.12.2014 dated and 29219 numbered.) The purpose of the Regulation is to set forth the principles and procedures for monitoring and reporting of greenhouse gases arising from the facilities performing the activities listed in Annex 1 of the Regulation, which are using energy intensively (Erzin natural gas power plant of Akenerji is covered under Annex 1). Pursuant to Article 6 of the Regulation, operators of the Facilities shall monitor the GHG arising from their Facilities according to the principles set forth in the Regulation, and shall prepare a GHG monitoring plan for this purpose. Furthermore, as per Article 7 of the Regulation, the operators of such Facilities shall submit an annual GHG report prepared in accordance with the monitoring plan to the Ministry of Environment by the end of each April for the GHG emissions observed in the previous calendar year. 1st reports submitted in April 2016. Any failure on reporting obligations results in penalty.

Time horizon Short-term

Likelihood Exceptionally unlikely

Magnitude of impact Low

Are you able to provide a potential financial impact figure? Yes, a single figure estimate

Potential financial impact figure (currency) 28000

## Potential financial impact figure - minimum (currency)

<Not Applicable>

#### Potential financial impact figure – maximum (currency) <Not Applicable>

#### Explanation of financial impact figure

As a negative financial impact; failure to meet obligations under the Regulation for Monitoring, Reporting and Verification of Greenhouse Gas Emissions could result in a penalty of up to US\$ 28,000 annually per applicable facility according to the regulation and at current rates.

# Cost of response to risk

814150

#### Description of response and explanation of cost calculation

Akenerji submitted its monitoring plan to the related Ministry. Since the Law for Carbon emissions reporting became mandatory in 2015, Akenerji submits an annual GHG report that is prepared in accordance with the monitoring plan to the Ministry of Environment for the GHG emissions observed in the previous calendar year. Both the GHG monitoring plans and the annual GHG reports are verified by accredited verification institutions before their submission to the Ministry of Environment.

#### Comment

Akenerji has installed an emission monitoring system to its power plant of Erzin, which is producing electricity from natural gas, to meet with its GHG emissions reporting obligations. The cost of the system was US\$ 814,150. In addition, Akenerji has to procure services from an accredited verification institution each year to get its monitoring plan and the report verified. As an additional to other operating costs, the cost of such services is ave. US\$ 8,500 per annum.

#### Identifier

Risk 3

#### Where in the value chain does the risk driver occur?

Direct operations

## Risk type & Primary climate-related risk driver

Chronic physical Changes in precipitation patterns and extreme variability in weather patterns

#### Primary potential financial impact

Decreased revenues due to reduced production capacity

#### Climate risk type mapped to traditional financial services industry risk classification <Not Applicable>

## Company-specific description

Climate change is a key driver for hydropower. It will cause increased variability of precipitation events which will result in more severe and frequent floods and droughts, seasonal offsets, changes in seasonality, etc. In this risk, as a result of increase in average precipitation (increase in drought seasons) may cause reduced access to water for electricity generation for Akenerji's hydroelectric power plants.

#### **Time horizon**

Medium-term

## Likelihood

More likely than not

#### Magnitude of impact

High

# Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

# Potential financial impact figure (currency)

38000000

# Potential financial impact figure – minimum (currency)

<Not Applicable>

#### Potential financial impact figure – maximum (currency) <Not Applicable>

#### Explanation of financial impact figure

Negative financial implications may change according to the magnitude of the drought, so the effect can not be clearly calculated. However, the revenue loss due to drought for the first 3 months of 2014 was roughly US\$ 38,000,000 when it was compared to the same period of the previous year. (Calculation is based on the differences in hydro generation values for the first three months of 2013 and 2014. The average market price for the first three months is used in the calculation.)

# Cost of response to risk

0

#### Description of response and explanation of cost calculation

Energy is a vital source for the development of our country and to maintain the modern life style of human beings. Our prior goal is to provide continuous power supply on that purpose. For that reason, we diversify the electricity generation sources by investing in a state of art natural gas combined cycle power plant, which are considered as base load plants for security of supply. Besides, it provides electricity in high emission efficiency according to most of the natural gas power plants.

#### Comment

The management of this risk is currently a part of our daily business as we did avaluated within the short-term time horizon. Therefore, apart from the supporting tools for weather forecasting, which roughly has a cost of US\$ 15,000 pa, there is no other additional cost on top of the current OPEX. However, considering that the patterns are likely to change more in the future, Akenerji is studying the long-term affects of this risk on Akenerji's current assets, and looking for additional tools.

# Identifier

Risk 4

#### Direct operations

## Risk type & Primary climate-related risk driver

Chronic physical

# Rising mean temperatures

#### Primary potential financial impact

Decreased revenues due to reduced production capacity

Climate risk type mapped to traditional financial services industry risk classification

<Not Applicable>

#### Company-specific description

If summer heat is higher than expected, this would likely increase electricity demand, which would have an increasing effect on the electricity market prices. In such a case Akenerji may need to buy additional electricity from the market to cover its short position if any shortfall in renewables generation.

Time horizon

Short-term

Likelihood

Magnitude of impact

Hiah

## Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact figure (currency) 8640000

#### Potential financial impact figure - minimum (currency)

<Not Applicable>

## Potential financial impact figure - maximum (currency)

<Not Applicable>

#### Explanation of financial impact figure

If the difference between the market price and the contract of the customer is US\$ 10 per MWh, and Akenerji has a short position of 100 MW for a specific month (30-day), then costs would rise by US\$ 720,000/month., which makes US\$ 8,640,000/year. This figure could be used for estimated negative financial impact.

#### Cost of response to risk

0

#### Description of response and explanation of cost calculation

This can be overcome by planning the generation based on the weather forecasts and by diversifying the portfolio by investing in gas, hydro and wind in order to decrease the fuel price risk.

#### Comment

The management of this risk is currently a part of our daily business as we did avaluated within the short-term time horizon. Therefore, apart from the supporting tools for weather forecasting, which roughly has a cost of US\$ 15,000 pa, there is no other additional cost on top of the current OPEX. However, considering that the patterns are likely to change more in the future, Akenerji is studying the long-term affects of this risk on Akenerji's current assets.

#### Identifie

Risk 5

#### Where in the value chain does the risk driver occur? Direct operations

Risk type & Primary climate-related risk driver

Acute physical Increased severity and frequency of extreme weather events such as cyclones and floods

#### Primary potential financial impact

Increased capital expenditures

## Climate risk type mapped to traditional financial services industry risk classification

<Not Applicable>

## **Company-specific description**

Storm, strong wind and strong rain due to climate change may have impacts on all power plants. As it is explained by the scientists, it is likely that in a warmer climate heavy rainfall will increase and be produced by fewer more intense events. This could lead to longer dry spells and a higher risk of floods. It can damage power generation units and distribution lines of Hydroelectric Power Plants (HEPPs). Coastal areas are highly dynamic: storms batter, sea levels rise, and land shifts. This already poses problems for the safety (flooding, loss of power, loss of communications, blockage of evacuation routes and equipment malfunction, etc.) of Erzin natural gas power plant, which located near by the sea.

Time horizon Long-term

Likelihood About as likely as not

Magnitude of impact High

Are you able to provide a potential financial impact figure? Yes, a single figure estimate

#### Potential financial impact figure – minimum (currency) <Not Applicable>

Potential financial impact figure - maximum (currency)

<Not Applicable>

#### Explanation of financial impact figure

Financial implications have a broad scale of possibilities depending on the impact. Therefore, both the impact and its financial negative implication can differ according to the magnitude of the damage. In case of such event, heavy damage on power plants, power distribution lines, loss of power generation due to stopped operation, loss from the electricity sales from assets due to market prices, etc. shall be considered for the financial impact calculations. Although such a case study with exact figures doesn't exist, any cost of such event higher than US\$ 10 mio. can be considered as with high impact.

#### Cost of response to risk

0

#### Description of response and explanation of cost calculation

Since we can not have a direct control over the such events, Akenerji improves its emergency response capacities, include severe weather events in the insurance of our power plants, etc. Apart form that all our power plants are designed and built in accordance with the long-term historical data of such extreme weather events which is especially important for the dam design, etc. for hydroelectrci power plantsfor flooding. We have a diversified production mix., which are located in different regions of Turkey, which we believe it would diversify the risk.

#### Comment

Apart from the insurances, there are no other costs. The insurance cost for the extreme weather events cannot be separetly given than the full cost of the insurance. Therefore, the cost is taken as zero. We take precautions by evaluating weather forecasts and maximum flow expectations. Besides; continuous maintenance and repairments are driven in the plants.

# C2.4

(C2.4) Have you identified any climate-related opportunities with the potential to have a substantive financial or strategic impact on your business? Yes

# C2.4a

(C2.4a) Provide details of opportunities identified with the potential to have a substantive financial or strategic impact on your business.

# Identifier

Opp1

Where in the value chain does the opportunity occur? Direct operations

## Opportunity type

Products and services

## Primary climate-related opportunity driver

Development and/or expansion of low emission goods and services

#### Primary potential financial impact

Increased revenues resulting from increased demand for products and services

#### **Company-specific description**

Turkey develops national emission reduction plan within the framework of EU-ETS Acquis approximation. If Turkey commits to make mitigation, sectoral emission reduction targets may be enforced with a cap system and carbon taxation will be applied. Akenerji's power plants producing renewable energy are in the Carbon registry. Currently, Turkey is in the global voluntary carbon market. The voluntary carbon market relates to transactions in carbon credits that fall outside the compliance schemes created under the Kyoto Protocol. Demand for carbon credits in this market is driven largely by companies that pursue voluntary greenhouse gas emissions targets and intend to demonstrate climate leadership within the industry. Since the market is voluntary, the demand for carbon offsetting, therefore the sale price of the carbon credits are very low. Cap system and/or carbon taxation will have an increasing effect on the demand and the prices. In this case, Akenerji's income from carbon offsetting activities will increase substantially.

Time horizon Long-term

Likelihood

Likely

Magnitude of impact Medium-low

Are you able to provide a potential financial impact figure? Yes, a single figure estimate

Potential financial impact figure (currency) 250000

Potential financial impact figure – minimum (currency) <Not Applicable>

Potential financial impact figure – maximum (currency) <Not Applicable>

#### Explanation of financial impact figure

If we consider that the current market prices of carbon credits double and Akenerji sells all its carbon credits produced for each year in the following year, we can expect more than US\$ 250,000 additional income on sale of renewables carbon certificates (assuming that Akenerji plants produces average per year 380,000 tCO2e VCS and 43,000 tCO2e Gold Standard).

#### Cost to realize opportunity

110000

#### Strategy to realize opportunity and explanation of cost calculation

We have been the first company to register to the National Carbon Registry (2011) that was launched by the Ministry of Environment and Urbanization to establish voluntary carbon markets and register ongoing projects. They are registered by Verified Carbon Standard (VCS and Gold Standard (GS). The carbon assets are sold to customers for offsetting their emissions.

#### Comment

Management cost mostly includes the verification and the issuance costs for the certificates. In such scenario as explained above, the cost of verification of 8 projects' generation and issuance cost of 380,000 tCO2e VCS and 43,000 tCO2e Gold Standard for each year, average US\$ 110,000 amounts to a total cost.

## Identifier

Opp2

Where in the value chain does the opportunity occur?

# Direct operations Opportunity type

Energy source

Primary climate-related opportunity driver Participation in carbon market

# Primary potential financial impact

Other, please specify (Reduced exposure to GHG emissions and therefore less sensitivity to changes in cost of carbon)

#### Company-specific description

Within the framework of approximation to EU Aquis, Turkey considers integrating to EU ETS system. If so, Akenerji is already in the Carbon registry and it will have carbon allowances considering power generation from renewable sources. Akenerji can offset Erzin's emissions, which would reduce the additional cost that Akenerji is exposed to.

Time horizon

Long-term

#### Likelihood Very likely

Magnitude of impact Medium-high

# Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

#### Potential financial impact figure (currency) 4653000

#### Potential financial impact figure – minimum (currency) <Not Applicable>

Potential financial impact figure - maximum (currency)

<Not Applicable>

#### Explanation of financial impact figure

It is not easy to calculate the potential upside financial impact. The amount could be clearer when the carbon taxation becomes more clear. However, if we consider that full year production of renewables will offset Erzin natural gas power plant's emissions, we can easily say that savings from US\$ 423,000 to US\$ 4,653,000 can be possible per annum, considering the total annual carbon certificates issued by Akenerji's renewables (carbon price from US\$ 1 to US\$ 11).

# Cost to realize opportunity

110000

#### Strategy to realize opportunity and explanation of cost calculation

We have been the first company to register to the National Carbon Registry (2011) that was launched by the Ministry of Environment and Urbanization to establish voluntary carbon markets and register ongoing projects. They are registered by Verified Carbon Standard (VCS and Gold Standard (GS). The carbon assets are sold to customers for offsetting their emissions.

#### Comment

Management cost mostly includes the verification and the issuance costs for the certificates. In such scenario as explained above, the cost of verification of 8 projects' generation and issuance cost of 380,000 tCO2e VCS and 43,000 tCO2e Gold Standard for each year, average US\$ 110,000 amounts to a total cost.

#### Identifier

Орр3

#### Where in the value chain does the opportunity occur? Direct operations

Opportunity type

Products and services

# Primary climate-related opportunity driver

Ability to diversify business activities

# Primary potential financial impact

Other, please specify (Better competitive position to reflect shifting consumer preferences, resulting in increased revenues)

#### Company-specific description

Akenerji is providing energy services to its customers to reduce their electricity consumption which helps them to achieve their energy and environmental goals. Services includes such as energy analysis and audits, energy management, maintenance and operation, monitoring and evaluation of savings, etc. Turkey develops national emission reduction plan within the framework of EU-ETS Acquis approximation. If Turkey introduces carbon taxation and/or an emissions trading system (ETS), which sets a limit (or cap) on greenhouse gas (GHG) emissions from installations covered by the system of the companies, the importance of energy efficiency will rise considerably, which will have a positive impact on Akenerji's energy services business.

#### **Time horizon**

Long-term

Likelihood Likely

# Magnitude of impact

Medium-low

Are you able to provide a potential financial impact figure? No, we do not have this figure

## Potential financial impact figure (currency) <Not Applicable>

## Potential financial impact figure - minimum (currency)

<Not Applicable>

#### Potential financial impact figure – maximum (currency) <Not Applicable>

#### Explanation of financial impact figure

Financial impact of the emission reduction precautions cannot be easily determined. We can only say that development of the energy management services sector will gain momentum in Turkey, which will in parallel support Akenerji to develop its Energy Management Services.

#### Cost to realize opportunity

0

## Strategy to realize opportunity and explanation of cost calculation

Akenerji is currently focused on developing its energy services and expanding the business by increasing the number of contracts awarded.

#### Comment

Rather than OPEX cost of the related Business Unit, Akenerji doesn't have any addditional costs arisen by these services.

# C3. Business Strategy

# C3.1

(C3.1) Have climate-related risks and opportunities influenced your organization's strategy and/or financial planning? Yes, and we have developed a low-carbon transition plan

# C3.1a

(C3.1a) Does your organization use climate-related scenario analysis to inform its strategy? Yes, qualitative

# C3.1b

## (C3.1b) Provide details of your organization's use of climate-related scenario analysis.

Climate- related scenarios and models applied	Details
Other, please specify (A2 scenario of IPCC)	The fifth assessment report of IPCC states that this change is extremely likely due to human activities. Based on different scenarios, climate scientists estimate increases between 1.5 and 4.5 oC by the end of the present century. Akenerji has 9 power plants located in Turkey (Adana, Adyaman, Bursa, Balkesir, Hatay). And Turkey is one of the countries that could be profoundly affected by the climate change. Akenerji considers climate change impacts to sustain its activities and use climate scenario analysis to assess the impacts. Akenerji use A2 scenario of IPCC. Assessment of climate change impact studies for Turkey are generally based on the A2 scenario of IPCC and that is why we select this scenario. In addition the future climate analysis of Turkey based on CMIP3 simulation that was used in the fourth Assessment Report of IPCC. The projection involves the simulation of the ECHAM5 General Circulation Model. For the wind projections, the northwestern parts of Turkey have the highest wind potentials. It could be said that the wind potential in these areas will increase in the future. The wind speeds in the Marmara region and northwestern parts of Turkey have the highest wind potentials. It could be said that the wind potential in these areas will increase in the future. The wind speeds in the Marmara region and northwestern parts of Turkey have the highest wind potential to these projections our Ayyldra power plant is located in Balkesir and As Akenerji, we continued to be one of the most prominent players in one of the most dynamic sectors of Turkey, the energy sector, again in 2018 with our 30-year experience and knowledge on sources, and we increased our total installed capacity to 1,224 MW and increased the share of renewable energy to 26% with the capacity increase in Ayyldra Wind Power Plant. In 2016, the investment to increase the installed capacity of Ayyldraw WPP bas "Good Mu Agree-Howere, it becomes increasingly difficult to utilize this potential to utilize. However, it becomes increasingly difficul
Nationally determined contributions (NDCs)	Turkey's National Contribution (INDC) plan is to reduce its emissions by 21% from 2030 BAU level by supporting the shift towards low carbon economy. To achieved this goal Turkey decided to obtain ISO 50001 energy management system certificate As Akenerji, we closely follow the recent updates on climate change mitigation efforts made both nationally and globally. In 2018, Akenerji decided to start the process to obtain ISO 50001 Energy Management Systems Certification for all our power plants until the end of April 2020. The National Energy Efficiency Action Plan to be implemented in the years 2017-2023 targeted 14% reduction of Turkey's primary energy consumption in 2023. To this end, the plan encompases a total of 55 actions in categories namely buildings and services, energy, transport, industry and technology and agriculture. It is envisaged that a cumulative 23.9 MTEP will be saved by 2023 with an investment of USD 10.9 billion. In this context, Akenerji Energy Services maintains its leading and innovative position in the sector with its services and business models, with productivity enhancing projects within the scope of Turkey's Energy Efficiency Action Plan. In place already are plans to move the Company's private sector projects that demonstrated high success in 2018 to the public sector as well in 2019, a result of the negotiations carried out with the Ministry of Energy. As Akenerji Energy Services, we continued to be the firm that secured highest rate of energy efficiency in the sector again in 2018 by achieving mean efficiency values of 35% in the natural gas through the projects we have executed since 2015. Also, we offer certified emission reduction certificates from international institutions that we obtain in through our renewable energy investments to our customers who wish to have carbon neutral electricity. Hereby, we make contributions to the sustainability targets of our customers who are highly sensitive to the environment, and who intend to diminish or even "eliminate" their carbon footp

# C3.1d

(C3.1d) Describe where and how climate-related risks and opportunities have influenced your strategy.

	Have climate- related risks and opportunities influenced your strategy in this area?	Description of influence
Products and services		1-The Company focuses on producing new ideasand projects that will enhance energy efficiency forindustrial and commercial customers, with energy systems optimization and management 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. Proving that efficiency is possible without investments, Akenerji Energy Services has upgraded its innovational service package by offering combined performance security, bringing together research and reporting, analysis and consultancy, project development, financing, maintenance, operation and validation services under a single roof. 2- In the sector in preventing carbon emission, Akenerji has VCS (Verified Carbon Standard) & Gold Standard & Social Carbon carbon emission reduction certificates in all renewable power plants where emission reduction certification studies are successfully carried out. These certificates, which are of great importance in the transition process to the low carbon economy, were issued to the AKENERJi power plants by international organizations (Verra, Gold Standard) with the approval of independent auditors.
Supply chain and/or value chain	Not evaluated	n/a
Investment in R&D	No	n/a
Operations	Yes	Optimization in the operations of our generation portfolio. We try to utilize opportunities in order to raech a balanced generation portfolio in terms of both source and geography.

# C3.1e

(C3.1e) Describe where and how climate-related risks and opportunities have influenced your financial planning.

	Financial planning elements that have been influenced	Description of influence
1	Direct costs	In the long term with the climate-related risks the inflows coming to hydrpower plants are assumed to decrease. Hence decreasing the revenues. For the sustainability and optimization of renewable generation a specific amount of CAPEX has been allocated in the financial planning. In the context of climate-related opportunities we generate revenues and have direct costs for the operations of Energy Services and for the activities in the Voluntary Carbon Offset market.

# C3.1f

(C3.1f) Provide any additional information on how climate-related risks and opportunities have influenced your strategy and financial planning (optional).

# C4. Targets and performance

# C4.1

(C4.1) Did you have an emissions target that was active in the reporting year? Intensity target

# C4.1b

(C4.1b) Provide details of your emissions intensity target(s) and progress made against those target(s).

Target reference number Int 1 Year target was set 2018

Target coverage Company-wide

Scope(s) (or Scope 3 category) Scope 1+2 (location-based)

Intensity metric Metric tons CO2e per megawatt hour (MWh)

Base year 2017

Intensity figure in base year (metric tons CO2e per unit of activity) 1635860

% of total base year emissions in selected Scope(s) (or Scope 3 category) covered by this intensity figure 99.98

Target year 2035

Targeted reduction from base year (%)

Intensity figure in target year (metric tons CO2e per unit of activity) [auto-calculated] 817930

% change anticipated in absolute Scope 1+2 emissions

36

% change anticipated in absolute Scope 3 emissions

42

Intensity figure in reporting year (metric tons CO2e per unit of activity) 1039827

% of target achieved [auto-calculated] 72.8709058232367

**Target status in reporting year** Underway

Is this a science-based target? No, but we anticipate setting one in the next 2 years

Please explain (including target coverage)

In 2017, Scope 1+2 accounted for 1,635,860 tCO2e and in 2019, Scope 1+2 accounted for 1039827 tCO2e, it means we have achieved a 36 % reduction against the 2017 baseline.

# C4.2

(C4.2) Did you have any other climate-related targets that were active in the reporting year? No other climate-related targets

## C4.3

Yes

# C4.3a

## (C4.3a) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e (only for rows marked *)
Under investigation	1	223658
To be implemented*	0	0
Implementation commenced*	0	0
Implemented*	0	0
Not to be implemented	0	0

Hydropower

# C4.3b

(C4.3b) Provide details on the initiatives implemented in the reporting year in the table below.

Initiative category & Initiative type

Low-carbon energy generation

# Estimated annual CO2e savings (metric tonnes CO2e)

223658

Scope(s) Scope 1

Voluntary/Mandatory Voluntary

v oranical y

Annual monetary savings (unit currency - as specified in C0.4)

0

Investment required (unit currency - as specified in C0.4)

Payback period Please select

Estimated lifetime of the initiative

Please select

#### Comment

320 MW of our installed capacity is from renewable energy generation and we are investing on hydro. We aim to increase our renewable energy generation installed capacity to 518 MW. 198 MW of increase will come from Kemah HEPP.

## C4.3c

#### (C4.3c) What methods do you use to drive investment in emissions reduction activities?

Method	Comment
Financial optimization calculations	Many emissions reduction activities, especially those related to energy efficiency, (for example, our automatic lighting controls) can have a strong ROI.
Compliance with regulatory requirements/standards	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 and 2019 under ISO 14064 was completed.
1,5 0,0	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.
Internal incentives/recognition programs	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.
Dedicated budget for energy efficiency	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 i 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.

# C4.5

(C4.5) Do you classify any of your existing goods and/or services as low-carbon products or do they enable a third party to avoid GHG emissions? Yes

# C4.5a

#### (C4.5a) Provide details of your products and/or services that you classify as low-carbon products or that enable a third party to avoid GHG emissions.

# Level of aggregation

Group of products

#### Description of product/Group of products

1-Renewable Energy: The Company has gone onto reshape its generation strategies to squeeze maximum benefit from renewable energy sources, and has continued operations oriented towards the necessary measures. 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 2019 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. Akenerji continues to conduct market research on projects with high capacity utilization and profitability for wind and solar energy to include in its portfolio. 2-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. 3-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 in sector in 2019 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 longevit

# Are these low-carbon product(s) or do they enable avoided emissions?

Low-carbon product and avoided emissions

#### Taxonomy, project or methodology used to classify product(s) as low-carbon or to calculate avoided emissions

Other, please specify (Renewable Energy Generation, Verified Carbon Standard (VCS), Gold Standard (GS) and Energy Services for Efficiency)

#### % revenue from low carbon product(s) in the reporting year

25

# % of total portfolio value <Not Applicable>

<Not Applicat

#### Asset classes/ product types

<Not Applicable>

#### Comment

1-Our renewable energy power plant installed capacity equals to 26% of our total generation portfolio. 2-We register certificates from the energy we generate from renewable sources. They are our low carbon products. We have been the first company to register to the National Carbon Registry (2011) that was launched by the Ministry of Environment and Urbanization to establish voluntary carbon markets and register ongoing projects. They are registered by Verified Carbon Standard (VCS) and Gold Standard (GS). 3-Akenerji Energy Services continued to provide the highest energy efficiency in its sector in 2019 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.

# C-EU4.6

(C-EU4.6) Describe your organization's efforts to reduce methane emissions from your activities.

Our methane emission sources are;

-LPG cylinder at kitchen to cook

-Gas detector enstrument

-Chromotograph calibration enstrument

As we look purhasing invoices to find the amount of the CH4 we used, we do not buy any CH4 sources so we do not use it in our power plants in 2019.

For example, we do not cook ourselves because we have a contract with the contractor food company. We have LPG in kitchen for emergency situations as the contractor firm could not manage to get meal.

## C5. Emissions methodology

# C5.1

## (C5.1) Provide your base year and base year emissions (Scopes 1 and 2).

#### Scope 1

Base year start January 1 2019

Base year end December 31 2019

Base year emissions (metric tons CO2e) 1028695

#### Comment

We are an electricity generation company which operates both thermal and renewable power plants. Our 99% of our overall emissions are sourced from Scope 1 emissions from thermal power plants.

#### Scope 2 (location-based)

Base year start January 1 2019

Base year end December 31 2019

## Base year emissions (metric tons CO2e)

11132

#### Comment

We use electricity from the grid, other than the electricity we generate.

## Scope 2 (market-based)

Base year start

January 1 2019

Base year end December 31 2019

Base year emissions (metric tons CO2e) 0

# Comment

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

# C5.2

(C5.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions. IPCC Guidelines for National Greenhouse Gas Inventories, 2006

ISO 14064-1

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

# C6. Emissions data

# C6.1

#### (C6.1) What were your organization's gross global Scope 1 emissions in metric tons CO2e?

#### Reporting year

Gross global Scope 1 emissions (metric tons CO2e) 1028695

## Start date

January 1 2019

## End date

December 31 2019

#### Comment

The data covers the GHG emissions of all the facilities located in İstanbul, Adana, Adıyaman, Bursa, Hatay and Balıkesir.

#### Past year 1

Gross global Scope 1 emissions (metric tons CO2e) 1281286

Start date

January 1 2018

#### End date

December 31 2018

# Comment

Greenhouse gas emissions generated from operations are presented in ton CO2 equivalent. Almost all of the Scope 1 greenhouse gas emissions are from natural gas burned in the natural gas power plant. In addition, diesel and gasoline fuels consumed by company rental-cars, and natural gas and fuel oil used for heating in the premises are causing Scope 1 emissions even in small quantities. The emission performance from Erzin NGCCPP, which is the only natural gas power plant operating in 2018 and which constitutes almost all of the Scope 1 emissions, is satisfactory. Our emissions were 1,628,616 metric tons CO2e for Scope 1 in 2017 and 1,281,093 metric tons CO2e for Scope 1 in 2018, because of decreasing the electricity generation by 15.7% in comparison to the last year. So we reduced our emissions 347.523 metric tons CO2e for Scope 1 in the comparision with the previous year. However, if we calculate our intensity which is 0,327 tCO2e/MWh which means 1.8% increase of emissions.

#### Past year 2

Gross global Scope 1 emissions (metric tons CO2e)

1628865 Start date

January 1 2017

#### End date

December 31 2017

#### Comment

Greenhouse gas emissions generated from operations are presented in ton CO2 equivalent. Almost all of the Scope 1 greenhouse gas emissions are from natural gas burned in the natural gas power plant. In addition, diesel and gasoline fuels consumed by company rental-cars, and natural gas and fuel oil used for heating in the premises are causing Scope 1 emissions even in small quantities. The emission performance from Erzin NGCCPP, which is the only natural gas power plant operating in 2017 and which constitutes almost all of the Scope 1 emissions, is satisfactory. Despite the increase in the amount of emission compared to 2016 due to more hours of operation and gross electricity generation in 2017 than in 2016, there is a decrease in the amount of emission per unit electricity generation in 2017 compared to 2016. In 2016 0,34 tCO2 e/MWh and in 2017 0,32 tCO2 e/MWh.

#### Past year 3

Gross global Scope 1 emissions (metric tons CO2e) 934839

Start date

January 1 2016

End date

December 31 2016

## Comment

Our emission performance at Erzin NGCCPP, which was active in 2016 and constituted almost all of our Scope 1 emission, is satisfactory. When unit gross electricity generated per unit emission is considered, it can be concluded that our efficiency has improved. While in 2014, gross 2,325 kWh electricity was generated for 1 kg of CO2e emission, in 2016 this became 3,02 kWh. This concludes that we managed to have 30 % improvement of Scope 1 emissions efficiency at Erzin NGCCPP.

# C6.2

#### (C6.2) Describe your organization's approach to reporting Scope 2 emissions.

## Row 1

#### Scope 2, location-based

We are reporting a Scope 2, location-based figure

## Scope 2, market-based

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

#### Comment

We use electricity from the grid, other than the electricity we generate. Scope 2 emissions are derived from the electricity used in the Head Quarters in Istanbul and from the electricity purchased from the outside, which is consumed in the plants.

## C6.3

## (C6.3) What were your organization's gross global Scope 2 emissions in metric tons CO2e?

#### **Reporting year**

Scope 2, location-based 11132

#### Scope 2, market-based (if applicable)

<Not Applicable>

# Start date

January 1 2019

#### End date

December 31 2019

#### Comment

We use electricity from the grid, other than the electricity we generate. Scope 2 emissions are derived from the electricity used in the Head Quarters in Istanbul and from the electricity purchased from the outside, which is consumed in the plants. The increase in the Scope 2 emissions is resulting from the increase in the amount of electricity purchased in 2019 due to the low generation at Erzin natural gas plant.

# Past year 1

#### Scope 2, location-based

9662

#### Scope 2, market-based (if applicable)

<Not Applicable>

### Start date

January 1 2018

End date December 31 2018

#### Comment

We use electricity from the grid, other than the electricity we generate. Scope 2 emissions are derived from the electricity used in the Head Quarters in Istanbul and from the electricity purchased from the outside, which is consumed in the plants. The increase in the Scope 2 emissions is resulting from the increase in the amount of electricity purchased in 2018 due to the low generation at Erzin natural gas plant.

#### Past year 2

#### Scope 2, location-based

6995

# Scope 2, market-based (if applicable)

<Not Applicable>

# Start date

January 1 2017

## End date

December 31 2017

## Comment

We use electricity from the grid, other than the electricity we generate. Scope 2 emissions are derived from the electricity used in the Head Quarters in Istanbul and from the electricity purchased from the outside, which is consumed in the plants. The decrease in the Scope 2 emissions is resulting from the decrease in the amount of electricity purchased in 2017 due to the high generation at Erzin natural gas plant.

#### Past year 3

Scope 2, location-based

14820

# Scope 2, market-based (if applicable)

<Not Applicable>

# Start date

January 1 2016

# End date

December 31 2016

# Comment

We use electricity from the grid, other than the electricity we generate. Scope 2 emissions are derived from the electricity used in the Head Quarters in Istanbul and from the electricity purchased from the outside, which is consumed in the plants. The increase in the Scope 2 emissions is resulting from the increase in the amount of electricity purchased in 2016 due to the low generation at Erzin natural gas plant.

## C6.4

(C6.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure?

## C6.4a

(C6.4a) Provide details of the sources of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure.

#### Source

Fugitive refrigerant GHGs from cooling systems.

#### Relevance of Scope 1 emissions from this source

Emissions are relevant but not yet calculated

#### Relevance of location-based Scope 2 emissions from this source

No emissions excluded

Relevance of market-based Scope 2 emissions from this source (if applicable) Emissions are not relevant

#### Explain why this source is excluded

We included the refrigerant GHGs from cooling systems at our Erzin NGCCPP. Emissions sourcing from refrigerants of cooling systems at our other premises are excluded for three reasons: (1) they are not likely to be a significant source of total scope 1 emissions (less than 1%), (2) there is no reliable method for accurate activity data, and (3) estimation of this source is considered inaccurate.

#### Source

Fugitive GHG emissions from fire extinguishers.

Relevance of Scope 1 emissions from this source Emissions are relevant but not yet calculated

Relevance of location-based Scope 2 emissions from this source

No emissions excluded

Relevance of market-based Scope 2 emissions from this source (if applicable)

# Emissions are not relevant

#### Explain why this source is excluded

We included the fugitive GHGs from fire extinguishers at our Erzin NGCCPP. Emissions sourcing from fire extinguishers at our other premises are excluded particularly for two reasons: (1) they are not likely to be a significant source of total scope 1 emissions (less than 1%), (2) there is inadequate work and budget source to gather.

### C6.5

(C6.5) Account for your organization's gross global Scope 3 emissions, disclosing and explaining any exclusions.

Purchased goods and services

Evaluation status

Relevant, not yet calculated

Metric tonnes CO2e <Not Applicable>

# Emissions calculation methodology

#### <Not Applicable>

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

<Not Applicable>

#### Please explain

According to ISO 14064 GHG Reporting and Verification Standard , the datas will be calculated next years.

#### **Capital goods**

Evaluation status Relevant, not yet calculated

# Metric tonnes CO2e

<Not Applicable>

#### Emissions calculation methodology <Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners <Not Applicable>

#### <not Applicable

#### Please explain

Life Cycle Assessment is not extensively used in Turkey, therefore at the moment it is so difficult to calculate those emissions.

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

Evaluation status

Relevant, calculated

Metric tonnes CO2e

262

## Emissions calculation methodology

At RMS, where the pressure of Natural Gas is regulated during NG supply to Erzin NGCCPP.

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

100

#### Please explain

We are willing to enlarge and improve our GHG Inventory system, as a result of this we calculated the GHGs sourced from the RMS (Station to regulate the pressure of Natural Gas during NG supply to Erzin NGCCPP.

#### Upstream transportation and distribution

Evaluation status Relevant, not yet calculated

Metric tonnes CO2e

<Not Applicable>

## Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners <Not Applicable>

#### Please explain

According to ISO 14064 GHG Reporting and Verification Standard , the datas will be calculated next years.

#### Waste generated in operations

Evaluation status Relevant, not yet calculated

#### Metric tonnes CO2e <Not Applicable>

Emissions calculation methodology <Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners <Not Applicable>

#### Please explain

According to ISO 14064 GHG Reporting and Verification Standard , the datas will be calculated next years.

## Business travel

Evaluation status Relevant, not yet calculated

# Metric tonnes CO2e

<Not Applicable>

## Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners <Not Applicable>

#### Please explain

According to ISO 14064 GHG Reporting and Verification Standard , the datas will be calculated next years.

## Employee commuting

Evaluation status Relevant, not yet calculated

#### Metric tonnes CO2e

<Not Applicable>

## Emissions calculation methodology

<Not Applicable>

# Percentage of emissions calculated using data obtained from suppliers or value chain partners <Not Applicable>

#### Please explain

According to ISO 14064 GHG Reporting and Verification Standard , the datas will be calculated next years.

#### Upstream leased assets

**Evaluation status** Not relevant, explanation provided

Metric tonnes CO2e <Not Applicable>

#### Emissions calculation methodology

<Not Applicable>

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

<Not Applicable>

# Please explain

We do not have upstream leased assets in 2019.

Downstream transportation and distribution

#### Evaluation status Relevant, not yet calculated

Metric tonnes CO2e

<Not Applicable>

#### Emissions calculation methodology

<Not Applicable>

# Percentage of emissions calculated using data obtained from suppliers or value chain partners <Not Applicable>

#### Please explain According to ISO 14064 GHG Reporting and Verification Standard , the datas will be calculated next years.

Processing of sold products

## **Evaluation status**

Not relevant, explanation provided

Metric tonnes CO2e <Not Applicable>

#### Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners <Not Applicable>

# Please explain

Not relevant.

# Use of sold products

Evaluation status Not relevant, explanation provided

Metric tonnes CO2e <Not Applicable>

## Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners <Not Applicable>

Please explain There is no use of sold products

#### End of life treatment of sold products

**Evaluation status** Not relevant, explanation provided

Metric tonnes CO2e

<Not Applicable>

# Emissions calculation methodology

<Not Applicable>

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

# <Not Applicable> Please explain

There is no end of life treatment of sold products

#### Downstream leased assets

**Evaluation status** Not relevant, explanation provided

Metric tonnes CO2e <Not Applicable>

#### Emissions calculation methodology

<Not Applicable>

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

<Not Applicable>

# Please explain

We do not have downstream leased assets in 2019.

# Franchises

**Evaluation status** Not relevant, explanation provided

Metric tonnes CO2e <Not Applicable>

### Emissions calculation methodology

<Not Applicable>

# Percentage of emissions calculated using data obtained from suppliers or value chain partners <Not Applicable>

Please explain We do not have franchises.

#### Investments

**Evaluation status** Not relevant, explanation provided

Metric tonnes CO2e <Not Applicable>

#### Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners <Not Applicable>

Please explain We do not have investments.

# Other (upstream)

Evaluation status Not relevant, explanation provided

Metric tonnes CO2e <Not Applicable>

# Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners <Not Applicable>

Please explain We have no other upstream emissions.

## Other (downstream)

**Evaluation status** Not relevant, explanation provided

Metric tonnes CO2e <Not Applicable>

# Emissions calculation methodology

<Not Applicable>

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

# <Not Applicable> Please explain

We have no other downstream emissions.

# C6.7

(C6.7) Are carbon dioxide emissions from biogenic carbon relevant to your organization?

No

# C6.10

(C6.10) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

# Intensity figure

0.26

Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e) 1039827

Metric denominator megawatt hour generated (MWh)

Metric denominator: Unit total 3876285.16

Scope 2 figure used Location-based

% change from previous year 0.03

Direction of change Decreased

#### Reason for change

Our emissions were 1,290,948 metric tons CO2e for Scope 1+2 in 2018 and 1,039,827 metric tons CO2e for Scope 1+2 in 2019, because of decreasing the electricity generation by 19% in comparison to the last year. So we reduced our emissions 251,121 metric tons CO2e which means 24 % for Scope 1+2 in the comparision with the previous year. Although, if we calculate our intensity which is 0,27 tCO2e/MWh in 2018 and 0,26 tCO2e/MWh in 2019 which means 0,03 % decreased in the comparision with the previous year.

# Intensity figure

0.003

Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e) 1039827

Metric denominator

unit total revenue

Metric denominator: Unit total 322384766

Scope 2 figure used

% change from previous year 15

Direction of change

#### Reason for change

Although the gross global combined Scope 1 and 2 emissions decreased by 24% in 2019 compared to 2018, the total revenue of Akenerji decreased by 43% which is more than emissions. So, the intensity increased 15%.

#### C7. Emissions breakdowns

# C7.1

(C7.1) Does your organization break down its Scope 1 emissions by greenhouse gas type? Yes

# C7.1a

(C7.1a) Break down your total gross global Scope 1 emissions by greenhouse gas type and provide the source of each used greenhouse warming potential (GWP).

Greenhouse gas	Scope 1 emissions (metric tons of CO2e)	GWP Reference
CO2	1027722.041	IPCC Fourth Assessment Report (AR4 - 100 year)
CH4	393.158	IPCC Fourth Assessment Report (AR4 - 100 year)
N2O	579.944	IPCC Fourth Assessment Report (AR4 - 100 year)

# C-EU7.1b

# (C-EU7.1b) Break down your total gross global Scope 1 emissions from electric utilities value chain activities by greenhouse gas type.

	Gross Scope 1 CO2 emissions (metric tons CO2)	Gross Scope 1 methane emissions (metric tons CH4)	Gross Scope 1 SF6 emissions (metric tons SF6)	Total gross Scope 1 emissions (metric tons CO2e)	Comment
Fugitives	333.4	0	0	333.4	Fugitives releases : CO2
Combustion (Electric utilities)	1027225	391.02	0	1027.616	combustion within the company's boundary : CO2 and CH4
Combustion (Gas utilities)	0	0	0	0	We do not have gas utilities under our control. It is calculated at our Scope 3 emissions.
Combustion (Other)	163.51	2.14	0	166	Vehicle-based combustion
Emissions not elsewhere classified	0	0	0	0	There is no other emissions

# C7.2

## (C7.2) Break down your total gross global Scope 1 emissions by country/region.

Country/Region Scope 1 en	nissions (metric tons CO2e)
Turkey 1028695	

# C7.3

(C7.3) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.

By facility By activity

# C7.3b

#### (C7.3b) Break down your total gross global Scope 1 emissions by business facility.

Facility	Scope 1 emissions (metric tons CO2e)	Latitude	Longitude
Erzin NGCCPP	1028540.37	36	36
Bulam HEPP	7.83	43	42
Burç HEPP	5.33	38	38
Feke 1 HEPP	7.11	37	35
Feke 2 HEPP	9.92	37	35
Gökkaya HEPP	14.73	37	36
Himmetli HEPP	13.8	37	35
Uluabat HEPP	20.85	40	28
Ayyıldız WPP	10.72	40	27
Akhan Head Office	30.19	41	28

# C7.3c

# (C7.3c) Break down your total gross global Scope 1 emissions by business activity.

Activity	Scope 1 emissions (metric tons CO2e)
Combustion at Power Plants	1027.616
Combustion at offices	0
Vehicle-based combustion	166
Fugitive gases	333.4

# C-CE7.4/C-CH7.4/C-CO7.4/C-EU7.4/C-MM7.4/C-OG7.4/C-ST7.4/C-TO7.4/C-TS7.4

# (C-CE7.4/C-CH7.4/C-EU7.4/C-EU7.4/C-MM7.4/C-OG7.4/C-ST7.4/C-TO7.4/C-TS7.4) Break down your organization's total gross global Scope 1 emissions by sector production activity in metric tons CO2e.

	Gross Scope 1 emissions, metric tons CO2e	Net Scope 1 emissions , metric tons CO2e	Comment
Cement production activities	<not applicable=""></not>	<not applicable=""></not>	<not applicable=""></not>
Chemicals production activities	<not applicable=""></not>	<not applicable=""></not>	<not applicable=""></not>
Coal production activities	<not applicable=""></not>	<not applicable=""></not>	<not applicable=""></not>
Electric utility activities	1027.616	<not applicable=""></not>	Our 99% of our overall emissions are sourced from Scope 1 emissions from thermal power plant Erzin NGCCPP
Metals and mining production activities	<not applicable=""></not>	<not applicable=""></not>	<not applicable=""></not>
Oil and gas production activities (upstream)	<not applicable=""></not>	<not applicable=""></not>	<not applicable=""></not>
Oil and gas production activities (midstream)	<not applicable=""></not>	<not applicable=""></not>	<not applicable=""></not>
Oil and gas production activities (downstream)	<not applicable=""></not>	<not applicable=""></not>	<not applicable=""></not>
Steel production activities	<not applicable=""></not>	<not applicable=""></not>	<not applicable=""></not>
Transport OEM activities	<not applicable=""></not>	<not applicable=""></not>	<not applicable=""></not>
Transport services activities	<not applicable=""></not>	<not applicable=""></not>	<not applicable=""></not>

# C7.9

(C7.9) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year? Decreased

# C7.9a

(C7.9a) 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 emissions (metric tons CO2e)	Direction of change	Emissions value (percentage)	Please explain calculation
Change in renewable energy consumption	102.36	Decreased	6.92	For our renewable energy consumption, last year 102,36 tCO2e were reduced by our emissions reduction projects, and our total scope 1 and location based scope 2 emissions in the previous year was 1478,27, therefore we arrived at 6,92% through (102.36/1478,27)*100=6,92%
Other emissions reduction activities	0	No change	0	We do not have other emissions reduction activities
Divestment	0	No change	0	No divestments are made in 2019.
Acquisitions	0	No change	0	No acquistions are made in 2019
Mergers	0	No change	0	No mergers are made in 2019
Change in output	251121	Decreased	24.15	The total scope 1 and scope 2 emissions was decreased 251,121 metric tons CO2e according to the previous year, total scope 1 and scope 2 is 1,039,827 metric tons CO2e for 2019, therefore we arrived at 24.15% (251,121/1,039,827)*100=24.15
Change in methodology	0	No change	0	The same methodology (ISO 14064-1) has been used for three years.
Change in boundary	0	No change	0	there is no change in boundary.
Change in physical operating conditions	0	No change	0	No change is resulted from change in physical operating conditions.
Unidentified	0	No change	0	There is no unidentified reason for change.
Other	0	No change	0	There is no unidentified reason for change.

# C7.9b

(C7.9b) Are your emissions performance calculations in C7.9 and C7.9a based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?

Location-based

## C8. Energy

# C8.1

(C8.1) What percentage of your total operational spend in the reporting year was on energy? More than 95% but less than or equal to 100%

#### (C8.2) 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)	Yes
Consumption of purchased or acquired electricity	Yes
Consumption of purchased or acquired heat	No
Consumption of purchased or acquired steam	No
Consumption of purchased or acquired cooling	No
Generation of electricity, heat, steam, or cooling	Yes

# C8.2a

## (C8.2a) Report your organization's energy consumption totals (excluding feedstocks) in MWh.

	Heating value	MWh from renewable sources	MWh from non-renewable sources	Total (renewable and non-renewable) MWh
Consumption of fuel (excluding feedstock)	Unable to confirm heating value	0	722.15	722.15
Consumption of purchased or acquired electricity	<not applicable=""></not>	0	23485	23485
Consumption of purchased or acquired heat		<not applicable=""></not>	<not applicable=""></not>	<not applicable=""></not>
Consumption of purchased or acquired steam	<not applicable=""></not>	<not applicable=""></not>	<not applicable=""></not>	<not applicable=""></not>
Consumption of purchased or acquired cooling	<not applicable=""></not>	<not applicable=""></not>	<not applicable=""></not>	<not applicable=""></not>
Consumption of self-generated non-fuel renewable energy	<not applicable=""></not>	1412.65	<not applicable=""></not>	1412.65
Total energy consumption	<not applicable=""></not>	1412.65	24207.15	25619.8

# C8.2b

## (C8.2b) 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	Yes
Consumption of fuel for the generation of heat	No
Consumption of fuel for the generation of steam	No
Consumption of fuel for the generation of cooling	No
Consumption of fuel for co-generation or tri-generation	No

# C8.2c

(C8.2c) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.

Fuels (excluding feedstocks) Natural Gas Heating value LHV (lower heating value) Total fuel MWh consumed by the organization 2821825 MWh fuel consumed for self-generation of electricity 0 MWh fuel consumed for self-generation of heat 0 MWh fuel consumed for self-generation of steam <Not Applicable> MWh fuel consumed for self-generation of cooling <Not Applicable> MWh fuel consumed for self-cogeneration or self-trigeneration <Not Applicable> **Emission factor** 55.85

**Unit** kg CO2 per GJ

#### Emissions factor source

Power plant Gas Measurement Station Chromotograph

#### Comment

LHV is calculated from Power plant Gas Measurement Station Chromotograph Average Value for 2019

Fuels (excluding feedstocks) Motor Gasoline

# Heating value

LHV (lower heating value)

**Total fuel MWh consumed by the organization** 106.37

# MWh fuel consumed for self-generation of electricity 0

MWh fuel consumed for self-generation of heat 0

MWh fuel consumed for self-generation of steam <Not Applicable>

MWh fuel consumed for self-generation of cooling <Not Applicable>

MWh fuel consumed for self-cogeneration or self-trigeneration <Not Applicable>

#### Emission factor

69.3

Unit kg CO2 per GJ

Emissions factor source IPCC 2006 Table 3.2.1

#### Comment

LHV is used from the regulation. This is IPCC 2006 Table 3.2.1 factor and we used it in our verification for ISO 14064

Fuels (excluding feedstocks) Diesel

Heating value LHV (lower heating value)

**Total fuel MWh consumed by the organization** 615.78

MWh fuel consumed for self-generation of electricity

0

MWh fuel consumed for self-generation of heat

0

MWh fuel consumed for self-generation of steam <Not Applicable>

MWh fuel consumed for self-generation of cooling <Not Applicable>

MWh fuel consumed for self-cogeneration or self-trigeneration <Not Applicable>

Emission factor 74.1

**Unit** kg CO2 per GJ

Emissions factor source IPCC 2006 Table 2.2.

# Comment

LHV is used from the regulation. This is IPCC 2006 Table 2.2 factor and we used it in our verification for ISO 14064

# C-EU8.2d

(C-EU8.2d) For your electric utility activities, provide a breakdown of your total power plant capacity, generation, and related emissions during the reporting year by source.

#### Coal - hard

#### Nameplate capacity (MW)

0

Gross electricity generation (GWh)

0

Net electricity generation (GWh)

# 0

Absolute scope 1 emissions (metric tons CO2e)

# 0

Scope 1 emissions intensity (metric tons CO2e per GWh)

# 0

Comment

We do not have operations with coal

# Lignite

Nameplate capacity (MW)

# 0

Gross electricity generation (GWh)

# 0

Net electricity generation (GWh)

# 0

Absolute scope 1 emissions (metric tons CO2e)

# 0

Scope 1 emissions intensity (metric tons CO2e per GWh)

# 0

**Comment** We do not have operations with lignite

#### Oil

Nameplate capacity (MW)

0

Gross electricity generation (GWh)

# 0

Net electricity generation (GWh)

#### Ŭ

Absolute scope 1 emissions (metric tons CO2e)

## 0

Scope 1 emissions intensity (metric tons CO2e per GWh)

# 0 Comment

We do not have operations with oil

#### Gas

Nameplate capacity (MW) 904

Gross electricity generation (GWh) 2825824

# Net electricity generation (GWh) 2756472.4

Absolute scope 1 emissions (metric tons CO2e) 1028540.37

# Scope 1 emissions intensity (metric tons CO2e per GWh) 364.49

## Comment

The emission performance from Erzin NGCCPP, which is the only natural gas power plant operating in 2019 and which constitutes almost all of the Scope 1 emissions, is satisfactory. Our emissions were 1,281,093 metric tons CO2e for Scope 1 in 2018 and 1,028,540.37 metric tons CO2e for Scope 1 in 2019, because of decreasing the electricity generation by 28% in comparison to the last year. So we reduced our emissions 252,552.63 metric tons CO2e for Scope 1 in the comparision with the previous year. However, if we calculate our intensity which is 0,364 tCO2e/MWh.

#### Biomass

Nameplate capacity (MW)

0

Gross electricity generation (GWh)

0

Net electricity generation (GWh)

0

Absolute scope 1 emissions (metric tons CO2e)

0

Scope 1 emissions intensity (metric tons CO2e per GWh)

# 0

Comment We do not have operations with biomass

# Waste (non-biomass)

# Nameplate capacity (MW)

0

# Gross electricity generation (GWh)

0

# Net electricity generation (GWh)

# 0

Absolute scope 1 emissions (metric tons CO2e) 0

0

Scope 1 emissions intensity (metric tons CO2e per GWh)

**Comment** We do not have operations with waste (non-biomass)

## Nuclear

Nameplate capacity (MW)

0

Gross electricity generation (GWh)

# 0

Net electricity generation (GWh)

# 0

Absolute scope 1 emissions (metric tons CO2e)

## 0

0

Scope 1 emissions intensity (metric tons CO2e per GWh)

# Comment

We do not have operations with nuclear

# Fossil-fuel plants fitted with CCS

Nameplate capacity (MW)

# 0

Gross electricity generation (GWh)

#### -

Net electricity generation (GWh)

0

Absolute scope 1 emissions (metric tons CO2e)

# 0

0

Scope 1 emissions intensity (metric tons CO2e per GWh)

# Comment

We do not have operations with Fossil-fuel plants fitted with CCS

#### Geothermal

- Nameplate capacity (MW)
- 0

Gross electricity generation (GWh)

0

Net electricity generation (GWh)

0

Absolute scope 1 emissions (metric tons CO2e)

0

Scope 1 emissions intensity (metric tons CO2e per GWh)  $_{\rm 0}$ 

Comment

We do not have operations with geothermal

#### Hydropower

Nameplate capacity (MW) 292

## Gross electricity generation (GWh) 968.2

## Net electricity generation (GWh) 947.7

Absolute scope 1 emissions (metric tons CO2e) 79.57

Scope 1 emissions intensity (metric tons CO2e per GWh)

# 0.08 Comment

Our Scope 1 emissions intensity was 0.09 in 2018 and is decreased 0.08 in 2019.

# Wind

Nameplate capacity (MW)

28.2

Gross electricity generation (GWh) 86.2

#### Net electricity generation (GWh) 78.7

Absolute scope 1 emissions (metric tons CO2e) 10.72

Scope 1 emissions intensity (metric tons CO2e per GWh) 0.12

## Comment

Our Scope 1 emissions intensity was 0.12 in 2018 and is the same in 2019.

# Solar

Nameplate capacity (MW)

# 0

Gross electricity generation (GWh)

0

Net electricity generation (GWh)

# 0

Absolute scope 1 emissions (metric tons CO2e)

0

# Scope 1 emissions intensity (metric tons CO2e per GWh)

# 0

Comment

We do not have operations with solar

#### Marine

#### Nameplate capacity (MW)

0

Gross electricity generation (GWh)

0

Net electricity generation (GWh)

# 0

Absolute scope 1 emissions (metric tons CO2e)

# 0

Scope 1 emissions intensity (metric tons CO2e per GWh)

# 0

Comment

We do not have operations with marine

# Other renewable

Nameplate capacity (MW)

0

Gross electricity generation (GWh)

# 0

Net electricity generation (GWh)

# 0

Absolute scope 1 emissions (metric tons CO2e) 0

#### 0

Scope 1 emissions intensity (metric tons CO2e per GWh)

# 0

Comment We do not have operations with other renewable

#### Other non-renewable

Nameplate capacity (MW)

0

#### Gross electricity generation (GWh)

0

# Net electricity generation (GWh)

Ŭ

# Absolute scope 1 emissions (metric tons CO2e)

0

Scope 1 emissions intensity (metric tons CO2e per GWh)

# 0

Comment We do not have operations with other non-renewable

Total

#### Nameplate capacity (MW) 1224

Gross electricity generation (GWh) 3876.3

# Net electricity generation (GWh) 3782.9

Absolute scope 1 emissions (metric tons CO2e) 1028695

# Scope 1 emissions intensity (metric tons CO2e per GWh)

357.64

## Comment

For all of our power plants our emissions were 1,281,286 metric tons CO2e for Scope 1 in 2018 and 1,028,695 metric tons CO2e for Scope 1 in 2019, because of decreasing the electricity generation by 19 % in comparison to the last year. So we reduced our emissions 252,591 metric tons CO2e for Scope 1 in the comparison with the previous year. If we calculate our intensity which is 0,357 tCO2e/MWh for all facilities.

# C-EU8.4

(C-EU8.4) Does your electric utility organization have a transmission and distribution business? No  $\ensuremath{\mathsf{No}}$ 

# C9.1

(C9.1) Provide any additional climate-related metrics relevant to your business.

## C-EU9.5a

(C-EU9.5a) Break down, by source, your total planned CAPEX in your current CAPEX plan for power generation.

	CAPEX planned for power generation from this source	Percentage of total CAPEX planned for power generation	End year of CAPEX plan	Comment
Other, please specify (Hydropower & Wind)	1000000	41	2025	CAPEX investment amount for the optimization and sustainability of renewable power plants.
Gas	13500000	59	2025	CAPEX investment for the baseload generation coming from natural gas source.

## C-EU9.5b

## (C-EU9.5b) Break down your total planned CAPEX in your current CAPEX plan for products and services (e.g. smart grids, digitalization, etc.).

Products and services		planned for product/service	CAPEX	End of year CAPEX plan
Energy management services	In 2015, Energy Services, a pioneering venture in the energy sector, proved that Akenerji merits the added value and recognition it has achieved through the realization of projects, and demonstrated our aptitude for taking rapid, innovative and competitive steps. 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. This is also a result of free estimation and engineering studies carried out in the facilities. Proving that efficiency is possible without investments, Akenerji Energy Services has upgraded its innovational service package by offering combined performance security, bringing together research and reporting, analysis and consultancy, project development, financing, maintenance, operation and validation services under a single roof.		0.5	2025

## C-CE9.6/C-CG9.6/C-CH9.6/C-CN9.6/C-CO9.6/C-EU9.6/C-MM9.6/C-OG9.6/C-RE9.6/C-ST9.6/C-TO9.6/C-TS9.6

(C-CE9.6/C-CG9.6/C-CN9.6/C-CN9.6/C-CO9.6/C-EU9.6/C-MM9.6/C-OG9.6/C-RE9.6/C-ST9.6/C-TS9.6) Does your organization invest in research and development (R&D) of low-carbon products or services related to your sector activities?

	Investment in Iow-carbon R&D	Comment
Row 1	No	we do not have R&D

# C10. Verification

# C10.1

(C10.1) Indicate the verification/assurance status that applies to your reported emissions.

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

# C10.1a

(C10.1a) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.

Verification or assurance cycle in place Annual process

Status in the current reporting year Complete

Type of verification or assurance Reasonable assurance

Attach the statement Egemer-Scope 1&2\_2019-imzalı.pdf

Page/ section reference all pages

Relevant standard

Proportion of reported emissions verified (%) 99

# C10.1b

(C10.1b) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.

Scope 2 approach Scope 2 location-based

Verification or assurance cycle in place Annual process

Status in the current reporting year Complete

Type of verification or assurance Reasonable assurance

Attach the statement Egemer-Scope 1&2\_2019-imzalı.pdf

Page/ section reference all pages

Relevant standard ISO14064-3

Proportion of reported emissions verified (%) 87

# C10.1c

(C10.1c) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.

Scope 3 category Scope 3 (upstream)

Verification or assurance cycle in place Annual process

Status in the current reporting year Complete

Type of verification or assurance Reasonable assurance

Attach the statement Egemer-Scope 3\_2019-imzalı.pdf

Page/section reference all pages

Relevant standard ISO14064-3

Proportion of reported emissions verified (%) 100

C10.2

(C10.2) Do you verify any climate-related information reported in your CDP disclosure other than the emissions figures reported in C6.1, C6.3, and C6.5? In progress

# C11. Carbon pricing

# C11.1

(C11.1) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)? No, and we do not anticipate being regulated in the next three years

# C11.2

(C11.2) Has your organization originated or purchased any project-based carbon credits within the reporting period? No

# C11.3

(C11.3) Does your organization use an internal price on carbon? No, and we do not currently anticipate doing so in the next two years

#### C12. Engagement

# C12.1

(C12.1) Do you engage with your value chain on climate-related issues?

Yes, our customers

Yes, other partners in the value chain

#### C12.1b

(C12.1b) Give details of your climate-related engagement strategy with your customers.

Type of engagement Collaboration & innovation

**Details of engagement** Other, please specify

# % of customers by number

100

0

% of customer - related Scope 3 emissions as reported in C6.5

Portfolio coverage (total or outstanding)

<Not Applicable>

#### Please explain the rationale for selecting this group of customers and scope of engagement

Akenerji is providing energy services to its customers (retail-commercial) to reduce their electricity consumption which helps them to achieve their energy and environmental goals. Services includes such as energy analysis and audits, energy management, maintenance and operation, monitoring and evaluation of savings, etc. As Akenerji Energy Services, we visit target potential/existing commercial customers to provide information and so raise awareness about energy efficiency and try to get their interest on the matter . We see that there is a lack of knowledge among most of the energy consumers about the economic potential. We aim to increase the awareness and understanding of energy efficiency projects by explaining how they can benefit through cost-effective and easy-to-achieve non-technological measures in energy use. In return, while we support on reducing wasted energy consumption therefore the carbon emission, we benefit from improved revenue of Akenerji Energy Services business.

## Impact of engagement, including measures of success

Our success measures; - Increased awareness and understanding of potential/existing Customers in energy efficiency - Achieved up to mean efficiency values of 35% in electrical energy and 55% in natural gas consumptions by energy management projects we have executed since 2015

## C12.1d

## (C12.1d) Give details of your climate-related engagement strategy with other partners in the value chain.

In locations where Akenerji power plants operate, we aim to raise awareness and provide information to local communities about our operations. Through our video training on electricity generation, environmental and OHS regulations, we inform contractors, visitors, or interns who come to visit our power plants. Within the scope of these training processes, we have reached a total of 1,257 students and 82 teachers by visiting the schools around our power plants in Adana, Adıyaman and Bursa in 2019. We have informed about the operation of Burç and Bulam HEPP operating in Adıyaman, Uluabat HEPP operating in Bursa and Feke I, Feke II, Himmetli and Gökkaya HEPP operating in Adana and the personal security measures to be taken by the public regarding hydropower plants in general and about renewable energy and electricity production. With our awareness raising training courses performed as of 2013, we have reached a total of 9,137 students and 543 teachers.

# C12.3

## (C12.3) Do you engage in activities that could either directly or indirectly influence public policy on climate-related issues through any of the following? Direct engagement with policy makers Trade associations

Other

## C12.3a

#### (C12.3a) On what issues have you been engaging directly with policy makers?

Focus of legislation		Details of engagement	Proposed legislative solution
	with minor exceptions	about Mandatory Carbon reporting in Turkey. As Akenerji, we supported the law with minor exceptions. According to law Carbon reporting became mandatory since 2015 and we fulfilled the requirements. The details of the implementation phase will be clarified until 2019 and the	We support the development of carbon cap trade schemes and mandatory carbon reporting in Turkey. We are open to put our best effort and accumulated experiences to contribute to these developments. We believe that ensuring a satisfying technical capacity at all levels including governmental units and verifiers has a crucial importance. The price of carbon credits has also vital importance to run the system (market) successfully and effectively.

# C12.3b

(C12.3b) Are you on the board of any trade associations or do you provide funding beyond membership? Yes

## C12.3c

#### Trade association

TUSIAD (Turkish Industry & Business Association)

#### Is your position on climate change consistent with theirs?

Consistent

#### Please explain the trade association's position

TÜSİAD is a voluntary based civil society organization established by Turkish industrialists and business owners in 1971 in order to represent the business world. TÜSİAD aims to contribute to the formation and development of a social order based on the adoption of the universal principles of human rights, freedom of thought, belief and action, a secular state of law, as well as the concepts of participatory democracy, a liberal economy, the rules and regulations of a competitive market economy and environmental sustainability. All of TÜSİAD's work is essentially carried out through committees made up of TÜSİAD members. TÜSİAD's positions are formed through the work of 11 committees and, 36 working groups under the umbrella of these committees, and special purpose ad-hoc "task force" groups, all of which meet regularly.

#### How have you influenced, or are you attempting to influence their position?

Akenerji, being a member of the Environment Working Group and Energy Working Group, takes part in the formation of the association's position. Environment & Energy Working Groups aims to contribute to embedding sustainable development principles and to the environmental protection and spreading out the principles of low carbon economy into the business practices. Akenerji actively attends the working group meetings, involves in preparation of reports, provides opinion on the existing legislation and required developments/changes towards the sustainable electricity sector, paticipates in commenting on draft regulations, etc. The output of the studies are shared with the related government organizations, public authorities, public, etc. As an example, Akenerji contributed in preparation of "Sustainable Energy for Sustainable Future" report prepared by the TÜSİAD Energy Group. The report includes detailed analysis, roadmap and 10 tangible policy proposals for ecological effectiveness, financial efficiency, global competitiveness, social progress of the energy sector. The report is publicly available: https://tusiad.org/tr/yayinlar/raporlar/item/9978-surdurulebilir-gelecek-icin-surdurulebilir-enerji-raporu

#### Trade association

SHURA Energy Transition Center Turkish Wind Energy Association (TÜREB)

#### Is your position on climate change consistent with theirs?

Consistent

#### Please explain the trade association's position

SHURA Energy Transition Center: Contributes to decarbonisation of the energy sector via an innovative energy transition platform. It caters to the need for a sustainable and broadly recognised platform for discussions on policy, technological, and economic aspects of the Turkey's energy sector. SHURA's mission is to support the debate on transition to a low-carbon Turkey's energy system through energy efficiency and renewable energy by fact-based analysis and best available data. Taking into account all relevant perspectives by a multitude of stakeholders, the center contributes to an enhanced understanding of the economic potential, technical feasibility and the relevant policy tools for this transition. SHURA Energy Transition Center is founded by Stichting European Climate Foundation (ECF), Agora Energiewende and Sabanci University (SU) Istanbul Policy Center (IPC). Turkish Wind Energy Association (TÜREB): It is a technical non-profit organization, which follows scientific and technical researches related to wind energy, aims at extencive use of this energy, collects and complies technical info inline with this aim and performing widespread activities such as seminars, conferences and making publication for utilization of such info. Akenerji is also member of other associations Energy Trade Association (ETD), International Investor Assosciations (YASED), Wind Power and Hydropower Plants Businessmen's Association (RESSIAD), Hydro Energy Association (HESIAD).

#### How have you influenced, or are you attempting to influence their position?

Akenerji is a member of these associations. Participates in meetings and organizations to follow market developments (energy transition, tariffs, regulations, government policies, etc.), exchange of information, and be part of the development of the sector. Akenerji rises any point relevant to the concerns of these associations, debate and also convey it to policy makers.

# C12.3e

#### (C12.3e) Provide details of the other engagement activities that you undertake.

• In locations where Akenerji power plants operate, we aim to raise awareness and provide information to local communities about our operations. Through our video training on electricity generation, environmental and OHS regulations, we inform contractors, visitors, or interns who come to visit our power plants. We reached 9137 students and 543 teachers with our HEPP Informative Presentations tailor-made to inform the local communities on how clean energy is generated at these power plants. Number of participants trained and number of these informative meetings organized are of the measures of success.

• We closely follow legislative changes, give our comments on draft regulations etc. directly and/or through organizations mentioned in C12.3c.

• We build close relation with ministries, public authorities, local authorities and attend working groups as required.

# (C12.3f) What processes do you have in place to ensure that all of your direct and indirect activities that influence policy are consistent with your overall climate change strategy?

Overall Climate Change Strategy is executed and integrated into our overall strategy by Akenerji Management Committee with the approval of Board of Directors which has the top level responsibility in Akenerji's overall sustainability. The activities are developed and executed by the approval of the Board of Directors, based on company policies and strategical decisions on corporate sustainability.

As an electricity generating company in Turkey; the particular policy making and regulating authorities relevant with our business and climate change strategies are Ministry of Energy and Natural Resources, Energy Market Regulatory Authority (EPDK), Ministry of Environment and Urbanization. Therefore, for Direct Activities; we are frequently in touch with these policy makers and convey our propositions or feedbacks. Supporting the development of renewable energy generation, development on cap and trade schemes, mandatory carbon reporting are some of these examples also mentioned above. Top management of Akenerji and experts from relevant departments are attending the meetings held by decision making authorities and/or sending their opinions where necessary.

For indirect activities; Akenerji is a member of diversified business and sectoral associations as mentioned in C12.3c and C12.3e. TÜSİAD, SHURA, TÜREB, PETFORM, ETD are the most active ones to convey sectoral or industrial opinions to policy makers. Top management of Akenerji and experts from relevant departments are attending the meetings held by these associations and/or sending their opinions where necessary. Other associations and institutions Akenerji is member of and participates to their actions and activities are as follows:

World Energy Council Turkish National Committee (DEK-TMK)

Electricity Producers Association (EÜD)

Petroleum Platform Association (PETFORM)

Sabancı University İstanbul International Center for Energy and Climate (IICEC)

Association of Turkish Electricity Industry (TESAB)

Turkey Union of Chambers and Commodity Exchanges of Turkey (TOBB)

Turkish Investor Relations Society(TÜYİD)

Istanbul Minerals and Metals Exporters Association (İMMİB)

# C12.4

(C12.4) Have you published information about your organization's response to climate change and GHG emissions performance for this reporting year in places other than in your CDP response? If so, please attach the publication(s).

#### Publication

Other, please specify (Akenerji Sustainability Report)

Status Complete

Attach the document AKENERJI SUSTAINABILITY REPORT 2019.pdf

## Page/Section reference page 38

## **Content elements**

Governance Strategy Risks & opportunities Emissions figures Emission targets Other metrics

#### Comment

We share our climate change and GHG emissions performance with our stakeholders by Sustainability Report.

# C15. Signoff

C-FI

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

Annex 1 - Akenerji Annual Report 2019

Annex 2 - Akenerji Sustainability Report 2019 AKENERJI SUSTAINABILITY REPORT 2019.pdf Akenerji Annual Report 2019.pdf Akenerji Annual Report 2019.pdf AKENERJI SUSTAINABILITY REPORT 2019.pdf

# C15.1

(C15.1) Provide details for the person that has signed off (approved) your CDP climate change response.

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

Submit your response

In which language are you submitting your response?

English

Please confirm how your response should be handled by CDP

	I am submitting to	Public or Non-Public Submission
I am submitting my response	Investors	Public

#### Please confirm below

I have read and accept the applicable Terms