



## KAMUYU AYDINLATMA PLATFORMU

# ESENBOĞA ELEKTRİK ÜRETİM A.Ş. Sustainability Compliance Report 2024 - Annual Notification

### Summary

2024 Sustainability Compliance Report

Related Companies

Related Funds

|  | Company Compliance Status |         |    |                | Explanation  | Report Information on Publicly Disclosed Information (Page number, menu name on the website)  |
|--|---------------------------|---------|----|----------------|--|---|
|  | Yes                       | Partial | No | Not Applicable |  |   |
| <b>Sustainability Compliance Report</b>  |                           |         |    |                |  |   |
| <b>A. GENERAL PRINCIPLES</b>   |                           |         |    |                |  |   |
| <b>A1. Strategy, Policy and Goals</b>  |                           |         |    |                |  |   |
| A1.1. The prioritised environmental, social and corporate governance (ESG) issues, risks and opportunities have been determined by the Company's Board of Directors.   | X                         |         |    |                | ESG topics, risks and opportunities have been identified by the Board.   | 1) <a href="https://www.kap.org.tr/tr/Bildirim/1405212">https://www.kap.org.tr/tr/Bildirim/1405212</a> 2) <a href="https://en.esenbogaelektrik.com.tr/risky%C3%B6netimi">https://en.esenbogaelektrik.com.tr/risky%C3%B6netimi</a> |
| A1.1. The ESG policies (Environmental Policy, Energy Policy, Human Rights and Employee Policy etc.) have been created and disclosed to the public by the Company's Board of Directors.   | X                         |         |    |                | All relevant ESG policies are published on our corporate website under separate headings under the Sustainability Section. | <a href="https://en.esenbogaelektrik.com.tr/esgbi-lgi-vepoli-ti-kalarimiz">https://en.esenbogaelektrik.com.tr/esgbi-lgi-vepoli-ti-kalarimiz</a>   |
| A1.2. The short and long-term targets set within the scope of ESG policies have been disclosed to the public.  | X                         |         |    |                | Our short and long term targets have been determined and announced to the public.  | <a href="https://www.kap.org.tr/tr/Bildirim/1405212">https://www.kap.org.tr/tr/Bildirim/1405212</a>   |
| <b>A2. Implementation/Monitoring</b>   |                           |         |    |                |  |   |
| A2.1. The responsible committees and/or business units for the implementation of ESG policies and the senior officials related to ESG issues in the Company and their duties have been identified and disclosed to the public. | X                         |         |    |                | Responsible committees and their duties are disclosed to the public.   | <a href="https://en.esenbogaelektrik.com.tr/_files/ugd/aa0122_2b3ef9e865fa4460b36a4e1c8a40db5e.pdf">https://en.esenbogaelektrik.com.tr/_files/ugd/aa0122_2b3ef9e865fa4460b36a4e1c8a40db5e.pdf</a>                                 |
| A2.1. The activities carried out within the scope of policies by the responsible committee and/or unit have been reported to the Board of Directors at least once a year.  | X                         |         |    |                | Sustainability Division reports to the Board annually on its activities which are disclosed in 2024 annual report.         | <a href="https://www.kap.org.tr/tr/Bildirim/1405212">https://www.kap.org.tr/tr/Bildirim/1405212</a>   |
| A2.2. In line with the ESG targets, the implementation and action plans have been formed and disclosed to the public.  | X                         |         |    |                | It is stated in the annual report.   | <a href="https://www.kap.org.tr/tr/Bildirim/1405212">https://www.kap.org.tr/tr/Bildirim/1405212</a>   |
| A2.3. The Key ESG Performance Indicators (KPI) and the level of reaching these indicators have been disclosed to the public on yearly basis.   |                           |         | X  |                | Work is in progress and will be announced when it is completed.  |   |
| A2.4. The activities for improving the sustainability performance of the business processes or products and services have been disclosed to the public.  | X                         |         |    |                | Explained in the annual report and risks and opportunities report.   | 1) <a href="https://www.kap.org.tr/tr/Bildirim/1405212">https://www.kap.org.tr/tr/Bildirim/1405212</a> 2) <a href="https://en.esenbogaelektrik.com.tr/risky%C3%B6netimi">https://en.esenbogaelektrik.com.tr/risky%C3%B6netimi</a> |
| <b>A3. Reporting</b>   |                           |         |    |                |  |   |
| A3.1. The information about the sustainability performance, targets and actions have been given in annual reports of the Company an understandable, accurate and sufficient manner.  | X                         |         |    |                | Sustainability performance, targets and actions are included in the annual report.   | <a href="https://www.kap.org.tr/tr/Bildirim/1405212">https://www.kap.org.tr/tr/Bildirim/1405212</a>   |
| A3.2. The information about activities which are related to the United Nations (UN) 2030 Sustainable Development Goals have been disclosed to the public.  | X                         |         |    |                | Disclosed on the website and in the annual report.   | <a href="https://www.kap.org.tr/tr/Bildirim/1405212">https://www.kap.org.tr/tr/Bildirim/1405212</a>   |
|  |                           |         |    |                | There is no lawsuit filed  |   |

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| A3.3. The lawsuits filed and/or concluded against the Company about ESG issues which are material in terms of ESG policies and/or will significantly affect the Company's activities, have been disclosed to the public.   |   |   | X |  | against the Company on ESG issues.   |   |
| <b>A4. Verification</b>  |   |   |   |  |  |   |
| A4.1. The Company's Key ESG Performance metrics have been verified by an independent third party and publicly disclosed.   |   |   | X |  | This work is in progress and will be published with the sustainability report.               |   |
| <b>B. ENVIRONMENTAL PRINCIPLES</b>   |   |   |   |  |  |   |
| B1. The policies and practices, action plans, environmental management systems (known by the ISO 14001 standard) and programs have been disclosed.   | X |   |   |  | Our Environmental Policy is available on our corporate website.                              | <a href="https://en.esenbogaelektrik.com.tr/_files/ugd/aa0122_417effe28ef24e0f835e6d774bf9ef9e.pdf">https://en.esenbogaelektrik.com.tr/_files/ugd/aa0122_417effe28ef24e0f835e6d774bf9ef9e.pdf</a> |
| B2. The environmental reports prepared to provide information on environmental management have been disclosed to the public which is including the scope, reporting period, reporting date and limitations about the reporting conditions.   |   |   | X |  | To be stated in ISO 14064 Carbon Footprint 2024 Report.                                      |   |
| B4. The environmental targets within the scope of performance incentive systems which included in the rewarding criteria have been disclosed to the public on the basis of stakeholders (such as members of the Board of Directors, managers and employees).   |   | X |   |  | Work is in progress and will be announced when it is completed.                              |   |
| B5. How the prioritised environmental issues have been integrated into business objectives and strategies has been disclosed.  | X |   |   |  | It is disclosed in the Sustainability section of the annual report.                          | <a href="https://www.kap.org.tr/tr/Bildirim/1405212">https://www.kap.org.tr/tr/Bildirim/1405212</a>   |
| B7. The way of how environmental issues has been managed and integrated into business objectives and strategies throughout the Company's value chain, including the operational process, suppliers and customers has been disclosed.   | X |   |   |  | It is disclosed in the Sustainability section of the annual report.                          | <a href="https://www.kap.org.tr/tr/Bildirim/1405212">https://www.kap.org.tr/tr/Bildirim/1405212</a>   |
| B8. Whether the Company have been involved to environmental related organizations and non-governmental organizations' policy making processes and collaborations with these organizations has been disclosed.  | X |   |   |  | It is disclosed in the Sustainability section of the annual report.                          | <a href="https://www.kap.org.tr/tr/Bildirim/1405212">https://www.kap.org.tr/tr/Bildirim/1405212</a>   |
| B9. In the light of environmental indicators (Greenhouse gas emissions (Scope-1 (Direct), Scope-2 (Energy indirect), Scope-3 (Other indirect), air quality, energy management, water and wastewater management, waste management, biodiversity impacts)), information on environmental impacts is periodically disclosed to the public in a comparable manner. |   |   | X |  | To be stated in ISO 14064 Carbon Footprint 2024 Report.                                      |   |
| B10. Details of the standard, protocol, methodology, and baseline year used to collect and calculate data has been disclosed.  |   |   | X |  | To be stated in ISO 14064 Carbon Footprint 2024 Report.                                      |   |
| B11. The increase or decrease in Company's environmental indicators as of the reporting year has been comparatively disclosed with previous years.   |   |   | X |  | To be stated in ISO 14064 Carbon Footprint 2024 Report.                                      |   |
| B12. The short and long-term targets for reducing the environmental impacts have been determined and the progress compared to previous years' targets has been disclosed.  |   |   | X |  | To be stated in ISO 14064 Carbon Footprint 2024 Report.                                      |   |
| B13. A strategy to combat the climate crisis has been created and the planned actions have been publicly disclosed.  | X |   |   |  | Described in the Risks and Opportunities report.   | <a href="https://en.esenbogaelektrik.com.tr/risky%C3%B6netimi">https://en.esenbogaelektrik.com.tr/risky%C3%B6netimi</a>   |
| B14. The programs/procedures to prevent or minimize the potential negative impact of products and/or services on the environment have been established and disclosed.  | X |   |   |  | Work is in progress and will be announced when it is completed.                              |   |
| B14. The actions to reduce greenhouse gas emissions of third parties (suppliers, subcontractors, dealers, etc.) have been carried out and disclosed.   | X |   |   |  | Actions to increase supply chain sustainability are described on our corporate website under | <a href="https://en.esenbogaelektrik.com.tr/tedarikzinciriy%C3%B6netimi">https://en.esenbogaelektrik.com.tr/tedarikzinciriy%C3%B6netimi</a>   |

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|   |   |  |   | the heading of Supply Chain Management.  |   |
| B15. The environmental benefits/gains and cost savings of initiatives/projects that aims reducing environmental impacts have been disclosed.                                    | X |  |   | The energy efficiency increase and carbon footprint reduction achieved with the integrated storage solution in Ozmen-1 SPP has been publicly announced. With this technology, our renewable energy generation capacity corresponds to an extra 860000 kwh per year. This production corresponds to approximately 378.4 tons CO2eq of carbon emissions. | <a href="https://www.linkedin.com/feed/update/urn:li:activity:7281985123095318528/">https://www.linkedin.com/feed/update/urn:li:activity:7281985123095318528/</a> |
| B16. The data related to energy consumption (natural gas, diesel, gasoline, LPG, coal, electricity, heating, cooling, etc.) has been disclosed as Scope-1 and Scope-2.          |   |  | X | To be stated in ISO 14064 Carbon Footprint 2024 Report.  |   |
| B17. The information related to production of electricity, heat, steam and cooling as of the reporting year has been disclosed.   | X |  |   | It is stated in the annual report.   | <a href="https://www.kap.org.tr/tr/Bildirim/1405212">https://www.kap.org.tr/tr/Bildirim/1405212</a>   |
| B18. The studies related to increase the use of renewable energy and transition to zero/low carbon electricity have been conducted and disclosed.                               | X |  |   | It is disclosed in the Sustainability section of the annual report.  | <a href="https://www.kap.org.tr/tr/Bildirim/1405212">https://www.kap.org.tr/tr/Bildirim/1405212</a>   |
| B19. The renewable energy production and usage data has been publicly disclosed.  | X |  |   | It is stated in the annual report.   | <a href="https://www.kap.org.tr/tr/Bildirim/1405212">https://www.kap.org.tr/tr/Bildirim/1405212</a>   |
| B20. The Company conducted projects about energy efficiency and the amount of reduction on energy consumption and emission achieved through these projects have been disclosed. | X |  |   | The energy efficiency increase and carbon footprint reduction achieved with the integrated storage solution in Ozmen-1 SPP has been publicly announced. With this technology, our renewable energy generation capacity corresponds to an extra 860000 kwh per year. This production corresponds to approximately 378.4 tons CO2eq of carbon emissions. | <a href="https://www.linkedin.com/feed/update/urn:li:activity:7281985123095318528/">https://www.linkedin.com/feed/update/urn:li:activity:7281985123095318528/</a> |
| B21. The water consumption, the amount, procedures and sources of recycled and discharged water from underground or above ground (if any), have been disclosed.                 |   |  | X | To be stated in ISO 14064 Carbon Footprint 2024 Report.  |   |
| B22. The information related to whether Company's operations or activities are included in any carbon pricing   |   |  | X | After the carbon certification process is completed we will be covered by the GCC IHS  |   |

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| system (Emissions Trading System, Cap & Trade or Carbon Tax).   |   |  |   | Markit system. Carbon credits are expected to be issued in 2025.   |   |
| B23. The information related to accumulated or purchased carbon credits within the reporting period has been disclosed.   |   |  | X | There are no carbon credits accumulated or purchased during the reporting period.  |   |
| B24. If carbon pricing is applied within the Company, the details have been disclosed.  |   |  | X | Carbon pricing is not applied.   |   |
| B25. The platforms where the Company discloses its environmental information have been disclosed.   | X |  |   | Esenboğa Elektrik voluntarily discloses its environmental data in its sustainability report on the LSEG platform and on its website.   |   |
| <b>C. SOCIAL PRINCIPLES</b>   |   |  |   |  |   |
| <b>C1. Human Rights and Employee Rights</b>   |   |  |   |  |   |
| C1.1. The Institutional Human Rights and Employee Rights Policy has been established in the light of the Universal Declaration of Human Rights, ILO Conventions ratified by Turkey and other relevant legislation. The policy and the officials that responsible for the implementation of it have been determined and disclosed.   | X |  |   | Human rights and employee rights are available in our Ethics Policy and disclosed to the public.   | <a href="https://en.esenbogaelektrik.com.tr/_files/ugd/aa0122_02a30e1cb8534c41a292fba9f14c6231.pdf">https://en.esenbogaelektrik.com.tr/_files/ugd/aa0122_02a30e1cb8534c41a292fba9f14c6231.pdf</a> |
| C1.2. Considering the effects of supply and value chain, fair workforce, improvement of labor standards, women's employment and inclusion issues (gender, race, religion, language, marital status, ethnic identity, sexual orientation, gender identity, family responsibilities, union activities, political opinion, disability, social and cultural differences, etc., such as non-discrimination) are included in its policy on employee rights. | X |  |   | As a signatory of UNGC and UNWEPs, our ethics policy is available and disclosed to the public.   | <a href="https://en.esenbogaelektrik.com.tr/_files/ugd/aa0122_02a30e1cb8534c41a292fba9f14c6231.pdf">https://en.esenbogaelektrik.com.tr/_files/ugd/aa0122_02a30e1cb8534c41a292fba9f14c6231.pdf</a> |
| C1.3. The measures taken for the minority rights/equality of opportunity or the ones who are sensitive about certain economic, environmental, social factors (low income groups, women, etc.) along the supply chain have been disclosed.   | X |  |   | Information on CSR projects is provided on our website and in our annual report in the Sustainability section.   | <a href="https://www.kap.org.tr/tr/Bildirim/1405212">https://www.kap.org.tr/tr/Bildirim/1405212</a>   |
| C1.4. The developments regarding preventive and corrective practices against discrimination, inequality, human rights violations, forced and child labor have been disclosed.   | X |  |   | In compliance with Labor Law No. 4857, Esenboğa Elektrik observes the human rights of its employees in all its activities, including the prevention of child labor and forced labor. | <a href="https://en.esenbogaelektrik.com.tr/_files/ugd/aa0122_02a30e1cb8534c41a292fba9f14c6231.pdf">https://en.esenbogaelektrik.com.tr/_files/ugd/aa0122_02a30e1cb8534c41a292fba9f14c6231.pdf</a> |
| C1.5. Investments in employees (education, development policies), compensation, fringe benefits, right to unionize, work/life balance solutions and talent management are included in the employee rights policy.   | X |  |   | Available on our website under the Sustainability/ Social section.   | <a href="https://en.esenbogaelektrik.com.tr/_files/ugd/aa0122_764ee572e4ce47628eeff9bf1f08f273.pdf">https://en.esenbogaelektrik.com.tr/_files/ugd/aa0122_764ee572e4ce47628eeff9bf1f08f273.pdf</a> |
| C1.5. The mechanism for employee complaints and resolution of disputes have been established and related solution processes have been determined.   | X |  |   | In our company, employee complaints and disputes are resolved through the Ethics Line and other practices specified in the Ethics Policy.  | <a href="https://en.esenbogaelektrik.com.tr/_files/ugd/aa0122_02a30e1cb8534c41a292fba9f14c6231.pdf">https://en.esenbogaelektrik.com.tr/_files/ugd/aa0122_02a30e1cb8534c41a292fba9f14c6231.pdf</a> |
| C1.5. The activities carried out within the reporting period which related to ensure employee satisfaction have been disclosed.   |   |  | X | Work is in progress and will be announced when it is completed.  |   |

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| C1.6. The occupational health and safety policies have been established and disclosed.   | X |  |  | Our OHS Policies are available on our Corporate Website.   | <a href="https://en.esenbogaelektrik.com.tr/i-%C5%9Fsa%C4%9Fl%C4%B1%C4%9F%C4%B1veg%C3%BCvenli%C4%9Fi">https://en.esenbogaelektrik.com.tr/i-%C5%9Fsa%C4%9Fl%C4%B1%C4%9F%C4%B1veg%C3%BCvenli%C4%9Fi</a> |
| C1.6. The measures taken for protecting health, preventing occupational accidents and related statistics have been disclosed.  | X |  |  | The OHS policy and, where applicable, accident statistics are available on the corporate website.  | <a href="https://en.esenbogaelektrik.com.tr/_files/ugd/aa0122_7245ff1753244b939c3229ab99bcfc54.pdf">https://en.esenbogaelektrik.com.tr/_files/ugd/aa0122_7245ff1753244b939c3229ab99bcfc54.pdf</a>     |
| C1.7. The personal data protection and data security policies have been established and disclosed.   | X |  |  | Our information security policy is shared with the public on our corporate website.  | <a href="https://en.esenbogaelektrik.com.tr/_files/ugd/aa0122_c568c2bb76ec4d6dbad74d29d0954680.pdf">https://en.esenbogaelektrik.com.tr/_files/ugd/aa0122_c568c2bb76ec4d6dbad74d29d0954680.pdf</a>     |
| C1.8. The ethics policy have been established and disclosed.   | X |  |  | Our ethics policy is shared with the public on our corporate website.  | <a href="https://en.esenbogaelektrik.com.tr/_files/ugd/aa0122_02a30e1cb8534c41a292fba9f14c6231.pdf">https://en.esenbogaelektrik.com.tr/_files/ugd/aa0122_02a30e1cb8534c41a292fba9f14c6231.pdf</a>     |
| C1.9. The studies related to social investment, social responsibility, finansal inclusivity and access to finance have been explained.   | X |  |  | It is disclosed in the Sustainability section of the annual report.  | <a href="https://www.kap.org.tr/tr/Bildirim/1405212">https://www.kap.org.tr/tr/Bildirim/1405212</a>   |
| C1.10. The informative meetings and training programs related to ESG policies and practices have been organized for employees.   | X |  |  | Webinars are organized for our internal stakeholders within the scope of our material sustainability objectives and reported in the Annual Report. | <a href="https://www.kap.org.tr/tr/Bildirim/1405212">https://www.kap.org.tr/tr/Bildirim/1405212</a>   |
| <b>C2. Stakeholders, International Standards and Initiatives</b>   |   |  |  |  |   |
| C2.1. The customer satisfaction policy regarding the management and resolution of customer complaints has been prepared and disclosed.   | X |  |  | Our Customer Satisfaction Policy is publicly disclosed on our website.   | <a href="https://en.esenbogaelektrik.com.tr/_files/ugd/aa0122_12292b11a9904aada269781f66f6c0e8.pdf">https://en.esenbogaelektrik.com.tr/_files/ugd/aa0122_12292b11a9904aada269781f66f6c0e8.pdf</a>     |
| C2.2. The information about the communication with stakeholders (which stakeholder, subject and frequency) have been disclosed.  | X |  |  | The Stakeholder Communication Matrix has been shared with the public on our website.   | <a href="https://en.esenbogaelektrik.com.tr/_files/ugd/aa0122_aad680d2d81c4c0a95d623e142b0abf8.pdf">https://en.esenbogaelektrik.com.tr/_files/ugd/aa0122_aad680d2d81c4c0a95d623e142b0abf8.pdf</a>     |
| C2.3. The international reporting standards that adopted in reporting have been explained.   | X |  |  | Our sustainability reporting is prepared according to GRI standards. It will be the same for 2024 and will be published on our website.            |   |
| C2.4. The principles adopted regarding sustainability, the signatory or member international organizations, committees and principles have been disclosed.                         | X |  |  | We are a signatories of UNGC and UNWEPs and this is publicly disclosed on our website in Sustainability section.                                   | <a href="https://en.esenbogaelektrik.com.tr/">https://en.esenbogaelektrik.com.tr/</a>   |
| C2.5. The improvements have been made and studies have been carried out in order to be included in the Borsa Istanbul sustainability indices and/or international index providers. | X |  |  | With our ESG reporting score on the LSEG platform, our organization has been included in the BIST Sustainability Index since 2023.                 |   |

D. CORPORATE GOVERNANCE PRINCIPLES

|   |   |  |  |  |
|---|---|--|--|--|
| <p>D1. The opinions of stakeholders have been sought in the determination of measures and strategies related to sustainability field.</p>                           | X |  |  | <p>In line with the Materiality Analysis, we sent a survey to our stakeholders and consulted their opinions to identify our material sustainability goals. Our material sustainability goals for 2024 are included in the 2024 annual report.</p> <p><a href="https://www.kap.org.tr/tr/Bildirim/1405212">https://www.kap.org.tr/tr/Bildirim/1405212</a></p>                                   |
| <p>D2. The social responsibility projects, awareness activities and trainings have been carried out to raise awareness about sustainability and its importance.</p> | X |  |  | <p>Our Company develops social responsibility projects and shares the details on the website and in the annual report. We also organize monthly webinars to increase awareness of sustainability.</p> <p><a href="https://en.esenbogaelektrik.com.tr/kssves%C3%BCrd%C3%BCr%C3%BClebilirlikprojeleri">https://en.esenbogaelektrik.com.tr/kssves%C3%BCrd%C3%BCr%C3%BClebilirlikprojeleri</a></p> |