



Batıçim Bati Anadolu Çimento Sanayii Anonim Şirketi

2025 CDP Corporate Questionnaire 2025

Word version

Important: this export excludes unanswered questions

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

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C1. Introduction

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

Select from:

☒ English

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

Select from:

☒ TRY

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

(1.3.2) Organization type

Select from:

☒ Privately owned organization

(1.3.3) Description of organization

Founded in 1966 in the Aegean Region with 100% Turkish capital, Batıçim continues to shape the future of its industry and region. With its strong financial structure, deeply rooted corporate culture, and over half a century of experience, the company plays a pioneering role in Turkey's industrial and economic development. Batıçim is positioned as one of the leading companies in the Aegean Region through its subsidiaries operating in strategic sectors such as cement, clinker, ready-mixed concrete production, port operations, and energy generation and trade. Complementing its expertise in clinker and cement production with its strong presence in the ready-mixed concrete sector, Batıçim focuses on customer satisfaction through its innovative and high-quality products. The company's investment in Batılman Port Operations Inc. in Aliağa stands out by contributing significantly to both regional and national logistics infrastructure. Thanks to its strategic location, Batılman has become one of the most important ports in the Aegean Region. Since its establishment, Batıçim has continued to add value to the Turkish economy with an export network that extends across 3 continents and over 30 countries. Placing sustainable industry practices at the core of its operations, Batıçim implements projects focused on energy efficiency and a low-carbon economy. Driven by the principle of "Giving back to the land what we take from it," Batıçim embraces local development, social benefit, environmental awareness, and respect for people as core values, integrating these into all areas of its operations. With its commitment to ethical values, vision of continuous improvement, and environmentally friendly investments, Batıçim continues to be a strong actor in Turkey's development journey. Subsidiaries and Direct Shareholdings Batıçim further strengthens its sectoral presence through its subsidiaries: Batisöke Söke Çimento Sanayii T.A.Ş. – Clinker and

cement production and sales (74.62%) Batıçim Enerji Elektrik Üretim A.Ş. – Electricity generation and sales (100%) Ash Plus Yapı Malz. San. Tic. A.Ş. – Ash production and sales (100%) Batıbeton Sanayi A.Ş. – Ready-mixed concrete production and sales (100%) Batılıman Liman İşletmeleri A.Ş. – Port operations (90%)
[Fixed row]

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

(1.4.1) End date of reporting year

12/30/2024

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

Select from:

☒ Yes

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

Select from:

☒ Yes

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

Select from:

☒ 2 years

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

Select from:

☒ 2 years

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

Select from:

☒ 2 years
[Fixed row]

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

13440205

(1.5) Provide details on your reporting boundary.

	Is your reporting boundary for your CDP disclosure the same as that used in your financial statements?
	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

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

	Does your organization use this unique identifier?	Provide your unique identifier
ISIN code - bond	Select from: <input checked="" type="checkbox"/> Yes	TRABTCIM91F5
ISIN code - equity	Select from: <input checked="" type="checkbox"/> Yes	TRABTCIM91F5
CUSIP number	Select from:	Rich text input [must be under 50 characters]

	Does your organization use this unique identifier?	Provide your unique identifier
	<input checked="" type="checkbox"/> No	
Ticker symbol	Select from: <input checked="" type="checkbox"/> Yes	BTCIM

[Add row]

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

Select all that apply

☒ Turkey

(1.12) Which part of the concrete value chain does your organization operate in?

Select all that apply

☒ Clinker production

☒ Alternative 'low CO2' cementitious materials production

☒ Limestone quarrying

☒ Concrete production

☒ Aggregates production

☒ Portland cement manufacturing

(1.24) Has your organization mapped its value chain?

(1.24.1) Value chain mapped

Select from:

☒ Yes, we have mapped or are currently in the process of mapping our value chain

(1.24.2) Value chain stages covered in mapping

Select all that apply

- ☒ Upstream value chain
- ☒ Downstream value chain

(1.24.3) Highest supplier tier mapped

Select from:

- ☒ Tier 1 suppliers

(1.24.4) Highest supplier tier known but not mapped

Select from:

- ☒ Tier 2 suppliers

(1.24.7) Description of mapping process and coverage

Batı Anadolu Group of Companies has aimed not only to enhance operational efficiency but also to optimize our social and environmental impacts through comprehensive projects based on the principles of continuity and responsibility in supply chain management and procurement processes. The Sustainable Supply and Responsible Procurement Policy, published in 2024, has provided a more systematic framework for Batı Anadolu Group of Companies' sustainability approach within its value chain. This policy encompasses our commitment to transparency in the supply chain, adherence to ethical values, protection of labor rights, adoption of environmentally responsible production processes, and contribution to the well-being of local communities. The Group ensures that its business practices across the supply chain are conducted in line with the principles and values of sustainability by observing ethical, environmental, and social responsibilities. Our organization is committed to building honest, fair, and transparent relationships with our suppliers; prioritizing labor rights, environmentally friendly production processes, and the welfare of local communities. Furthermore, compliance with business ethics, contribution to environmental sustainability targets, and the promotion of diversity and inclusion are fundamental components of our supplier selection and audit processes. By adopting a sustainability-focused approach in procurement, supplier evaluation criteria have been updated. Suppliers holding international standards such as ISO 9001, ISO 14001, ISO 45001, and ISO 50001 are awarded additional points for each certificate, while ESG (Environmental, Social, and Governance) criteria have been incorporated into the approved supplier pre-assessment process. Suppliers are informed in advance, as part of the contract, about all occupational health and safety, environmental management, and other requirements communicated by the contracting or controlling unit, in compliance with technical specifications, as well as all applicable laws, regulations, and directives specified by the relevant departments. Compliance is regularly monitored by the responsible teams. Batı Anadolu Group of Companies also ensures that all suppliers meet internal demands on the development of their capabilities in environment, occupational health and safety, quality, and sustainability by conducting Supplier Performance Evaluations on a quarterly basis.

[Fixed row]

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

(1.24.1.1) Plastics mapping

Select from:

☒ Yes, we have mapped or are currently in the process of mapping plastics in our value chain

(1.24.1.2) Value chain stages covered in mapping

Select all that apply

☒ Upstream value chain

☒ Downstream value chain

☒ End-of-life management

(1.24.1.4) End-of-life management pathways mapped

Select all that apply

☒ Preparation for reuse

☒ Recycling

☒ Waste to Energy

[Fixed row]

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

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

Short-term

(2.1.1) From (years)

0

(2.1.3) To (years)

3

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

This period prioritizes elements such as production risks caused by extreme weather events that can directly affect operational processes and preparedness for regulatory changes. At Batıçim, climate- and environment-related risks and opportunities are assessed across short (0–3 years), medium (4–10 years), and long term (10+ years) time horizons. A risk is considered substantive if it exceeds 0.25% of annual revenue (~33.6 million TRY) or leads to production disruptions above operational thresholds. This quantitative boundary is applied consistently in risk evaluation and directly linked to financial materiality.

Medium-term

(2.1.1) From (years)

4

(2.1.3) To (years)

10

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

The medium-term horizon addresses external policy impacts such as carbon pricing mechanisms and the EU Carbon Border Adjustment Mechanism (CBAM), shifts in customer demands, and transition strategies towards low-carbon technologies. At Batıçim, climate- and environment-related risks and opportunities are assessed across short (0–3 years), medium (4–10 years), and long term (10+ years) time horizons. A risk is considered substantive if it exceeds 0.25% of annual revenue (~33.6 million TRY) or leads to production disruptions above operational thresholds. This quantitative boundary is applied consistently in risk evaluation and directly linked to financial materiality.

Long-term

(2.1.1) From (years)

11

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

Select from:

☒ Yes

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

Batıçim views 2030 and 2050 as critical milestones in its climate action journey. The year 2030 aligns with the United Nations Sustainable Development Goals (SDGs), while 2050 represents a pivotal target year under the Paris Agreement. Our long-term ambition is to strengthen the climate resilience of our physical assets, invest in large-scale infrastructure, redesign business models in line with climate scenarios, and implement transformation processes consistent with our net-zero objectives. We are committed to ensuring that our decarbonization pathway is fully aligned with the Paris Agreement and global climate goals. To this end, we are in the process of setting and implementing Science-Based Targets (SBTi) that will guide our transition. These targets will serve as a strategic framework for reducing greenhouse gas emissions, enhancing operational efficiency, and integrating climate resilience into all aspects of our value chain. At Batıçim, climate- and environment-related risks and opportunities are assessed across short (0–3 years), medium (4–10 years), and long term (10+ years) time horizons. A risk is considered substantive if it exceeds 0.25% of annual revenue (~33.6 million TRY) or leads to production disruptions above operational thresholds. This quantitative boundary is applied consistently in risk evaluation and directly linked to financial materiality.

[Fixed row]

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

	Process in place	Dependencies and/or impacts evaluated in this process
	Select from: <input checked="" type="checkbox"/> Yes	Select from: <input checked="" type="checkbox"/> Both dependencies and impacts

[Fixed row]

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

	Process in place	Risks and/or opportunities evaluated in this process	Is this process informed by the dependencies and/or impacts process?
	Select from: <input checked="" type="checkbox"/> Yes	Select from: <input checked="" type="checkbox"/> Both risks and opportunities	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

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

Row 1

(2.2.2.1) Environmental issue

Select all that apply

☒ Climate change

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

Select all that apply

- ☒ Dependencies
- ☒ Impacts
- ☒ Risks
- ☒ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

- ☒ Direct operations
- ☒ Upstream value chain
- ☒ Downstream value chain

(2.2.2.4) Coverage

Select from:

- ☒ Full

(2.2.2.5) Supplier tiers covered

Select all that apply

- ☒ Tier 1 suppliers

(2.2.2.7) Type of assessment

Select from:

- ☒ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

- ☒ More than once a year

(2.2.2.9) Time horizons covered

Select all that apply

- ☒ Short-term
- ☒ Medium-term
- ☒ Long-term

(2.2.2.10) Integration of risk management process

Select from:

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

(2.2.2.11) Location-specificity used

Select all that apply

- ☒ Site-specific
- ☒ Local
- ☒ Sub-national
- ☒ National

(2.2.2.12) Tools and methods used

Enterprise Risk Management

- ☒ COSO Enterprise Risk Management Framework
- ☒ Enterprise Risk Management
- ☒ Internal company methods
- ☒ Risk models

International methodologies and standards

- ☒ Environmental Impact Assessment
- ☒ IPCC Climate Change Projections

- ☒ ISO 14001 Environmental Management Standard
- ☒ Life Cycle Assessment

Other

- ☒ Desk-based research
- ☒ Materiality assessment
- ☒ Partner and stakeholder consultation/analysis
- ☒ Scenario analysis
- ☒ Other, please specify :ISO 14064

(2.2.2.13) Risk types and criteria considered

Acute physical

- ☒ Drought

Chronic physical

- ☒ Sea level rise

Policy

- ☒ Carbon pricing mechanisms
- ☒ Changes to national legislation

Market

- ☒ Availability and/or increased cost of certified sustainable material
- ☒ Availability and/or increased cost of raw materials
- ☒ Changing customer behavior
- ☒ Uncertainty in the market signals

Reputation

- ☒ Stigmatization of sector

Technology

- ☒ Transition to lower emissions technology and products
- ☒ Transition to water intensive, low carbon energy sources
- ☒ Unsuccessful investment in new technologies

Liability

- ☒ Exposure to litigation
- ☒ Non-compliance with regulations

(2.2.2.14) Partners and stakeholders considered

Select all that apply

- ☒ Customers
- ☒ Employees
- ☒ Investors
- ☒ Suppliers
- ☒ Regulators
- ☒ Local communities

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

Select from:

- ☒ No

(2.2.2.16) Further details of process

Batıçım has established a comprehensive process, fully aligned with the GRI Standards, the TCFD recommendations, and the Türkiye Sustainability Reporting Standards (TSRS), to identify, assess, and manage environmental dependencies, impacts, risks, and opportunities (EDIROs) across all operations. This includes ecosystem services such as water, energy, raw materials, biodiversity, and clean air, as well as operational and supply chain dependencies. Environmental impacts are defined and evaluated by considering stakeholder inputs, sector trends, and regulatory requirements. Physical risks include extreme weather events, water scarcity, and biodiversity loss, assessed using IPCC climate scenarios. Transition risks cover carbon pricing, the EU Carbon Border Adjustment Mechanism (CBAM), evolving customer expectations, and market-driven regulatory changes. Opportunities are identified in areas such as renewable energy, circular economy practices, resource efficiency, and alternative fuel strategies including waste-derived fuels, biomass, and hydrogen. Strategic planning in these areas is supported by scenario analysis, operational mapping, and supply chain impact assessments, while external datasets and internationally recognized methodologies are used to ensure accuracy. Batıçım's governance structure mandates that the Sustainability Committee—chaired by a member of the Board of Directors and supported by senior

executives—monitors, evaluates, and manages climate- and sustainability-related issues at both operational and group levels. The Committee reviews risks and opportunities on a regular basis, develops mitigation and adaptation strategies, and ensures alignment with the company's overall risk appetite and sustainability targets. All identified climate and sustainability risks are integrated into the corporate risk management framework and systematically addressed within the Early Risk Detection Committee, ensuring that risks are handled holistically under a unified management system. The work of the Committee is supported by the Sustainability Sub-Committee, composed of department heads, which tracks progress, reviews action plans, and coordinates ESG-related activities across the organization. This governance model enhances operational integration, strengthens long-term resilience, and ensures that EDIROs are proactively managed in alignment with Batıçım's strategic objectives. Batıçım adopts a proactive approach by regularly reviewing regulatory, physical, and market-related trends, identifying potential impacts on operations and supply chains, and designing adaptation pathways aligned with its decarbonization targets. The company prioritizes the use of renewable energy, promotes resource efficiency, and integrates circular economy principles into its value chain. By embedding climate considerations into strategic planning and risk management, Batıçım safeguards business continuity, meets stakeholder expectations, and contributes to global climate goals.

Row 2

(2.2.2.1) Environmental issue

Select all that apply

☒ Water

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

Select all that apply

☒ Dependencies

☒ Impacts

☒ Risks

☒ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☒ Direct operations

☒ Upstream value chain

☒ Downstream value chain

(2.2.2.4) Coverage

Select from:

☒ Full

(2.2.2.5) Supplier tiers covered

Select all that apply

☒ Tier 1 suppliers

(2.2.2.7) Type of assessment

Select from:

☒ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

☒ More than once a year

(2.2.2.9) Time horizons covered

Select all that apply

☒ Short-term

☒ Medium-term

☒ Long-term

(2.2.2.10) Integration of risk management process

Select from:

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

(2.2.2.11) Location-specificity used

Select all that apply

☒ Site-specific

- ✓ Local
- ✓ Sub-national
- ✓ National

(2.2.2.12) Tools and methods used

Commercially/publicly available tools

- ✓ WRI Aqueduct
- ✓ WWF Water Risk Filter

Enterprise Risk Management

- ✓ COSO Enterprise Risk Management Framework
- ✓ Enterprise Risk Management
- ✓ Internal company methods
- ✓ Risk models

International methodologies and standards

- ✓ Environmental Impact Assessment
- ✓ IPCC Climate Change Projections
- ✓ ISO 14001 Environmental Management Standard
- ✓ ISO 14046 Environmental Management – Water Footprint
- ✓ Life Cycle Assessment

Databases

- ✓ Nation-specific databases, tools, or standards
- ✓ Regional government databases

Other

- ✓ Desk-based research
- ✓ Internal company methods
- ✓ Materiality assessment
- ✓ Partner and stakeholder consultation/analysis

- ☑ Scenario analysis

(2.2.2.13) Risk types and criteria considered

Acute physical

- ☑ Drought
- ☑ Flood (coastal, fluvial, pluvial, ground water)
- ☑ Heavy precipitation (rain, hail, snow/ice)
- ☑ Wildfires

Chronic physical

- ☑ Water stress
- ☑ Sea level rise
- ☑ Coastal erosion
- ☑ Change in land-use
- ☑ Groundwater depletion
- ☑ Changing precipitation patterns and types (rain, hail, snow/ice)
- ☑ Increased levels of environmental pollutants in freshwater bodies

Policy

- ☑ Changes to international law and bilateral agreements
- ☑ Changes to national legislation
- ☑ Increased difficulty in obtaining operations permits
- ☑ Increased difficulty in obtaining water withdrawals permit
- ☑ Increased pricing of water

Market

- ☑ Availability and/or increased cost of certified sustainable material
- ☑ Availability and/or increased cost of raw materials
- ☑ Changing customer behavior

- ☑ Declining water quality
- ☑ Rationing of municipal water supply
- ☑ Water quality at a basin/catchment level
- ☑ Increased severity of extreme weather events
- ☑ Changing temperature (air, freshwater, marine water)

Reputation

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

Technology

- ☒ Transition to water efficient and low water intensity technologies and products

Liability

- ☒ Exposure to litigation
- ☒ Non-compliance with regulations

(2.2.2.14) Partners and stakeholders considered

Select all that apply

- | | |
|---|--|
| <input checked="" type="checkbox"/> NGOs | <input checked="" type="checkbox"/> Regulators |
| <input checked="" type="checkbox"/> Customers | <input checked="" type="checkbox"/> Local communities |
| <input checked="" type="checkbox"/> Employees | <input checked="" type="checkbox"/> Water utilities at a local level |
| <input checked="" type="checkbox"/> Investors | |
| <input checked="" type="checkbox"/> Suppliers | |

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

Select from:

- ☒ No

(2.2.2.16) Further details of process

According to WWF Türkiye, the country is one of the 17 most water-stressed nations globally, a challenge that is expected to intensify due to population growth, climate change, and increasing drought risks. Acknowledging this systemic risk, Batıçım treats water as a strategic resource and has integrated water-related dependencies, impacts, risks, and opportunities into its core sustainability and risk management framework, fully aligned with GRI Standards, TCFD recommendations, and Türkiye Sustainability Reporting Standards (TSRS). Physical risks include prolonged droughts, reduced freshwater availability, and potential deterioration in water quality, all of which could directly impact production continuity and supply chain stability. Transition risks arise from tightening regulations on water use and discharge, possible increases in water-related costs, and heightened stakeholder expectations for responsible stewardship. At the same time, opportunities exist in developing advanced efficiency solutions, such as closed-loop systems, wastewater reuse, rainwater harvesting, and innovative recycling

technologies, enabling Batıçim to lead in water stewardship and circular economy practices. Our governance model ensures that water is managed with the same rigor as climate issues. The Sustainability Committee, chaired by a Board member and supported by senior executives, reviews water-related risks and opportunities alongside broader ESG priorities, while all identified risks are embedded into the corporate risk management framework and systematically reviewed in the Early Risk Detection Committee. The Sustainability Sub-Committee, composed of department heads, tracks progress on action plans, coordinates water-related initiatives across all operations, and ensures alignment with strategic objectives. This governance structure secures accountability at the highest level and promotes operational integration across the organization. Batıçim's proactive approach involves regular assessments of regulatory and market trends, and potential impacts on operations and supply chains. By investing in efficient water use, reducing dependency on freshwater resources, and embedding circular principles into our processes, we not only minimize risks but also enhance long-term resilience and create shared value. In positioning water management as a pillar of our sustainability strategy, Batıçim strengthens its competitiveness, safeguards business continuity, and contributes to Türkiye's efforts to address one of its most pressing environmental challenges.

[Add row]

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

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

Select from:

☒ Yes

(2.2.7.2) Description of how interconnections are assessed

Batıçim had already initiated structured impact assessments through its GRI-based sustainability reporting, which enabled the identification of environmental dependencies and impacts across operations. Building on this foundation, the company has started to implement the Türkiye Sustainability Reporting Standards (TSRS), incorporating financial materiality assessments to systematically evaluate how environmental issues translate into financial and strategic risks and opportunities. This dual approach allows Batıçim to connect impact materiality with financial materiality, ensuring that interconnections between dependencies, risks, and opportunities are addressed in a more comprehensive manner. As part of this process, critical dependencies such as freshwater use, energy needs, raw material availability, and ecosystem services are analyzed in relation to both physical and transition risks. For example, water scarcity is assessed not only as an operational dependency but also as a potential risk factor for production continuity and supply chains, especially when considered alongside climate hazards such as droughts and heatwaves. Similarly, the use of alternative fuels, including biomass, supports decarbonization objectives while introducing new vulnerabilities to climate variability and supply chain fluctuations. These interconnections are prioritized according to their environmental and financial significance and are integrated into the company's corporate risk radar. Oversight is ensured through Batıçim's governance structure. The Sustainability Committee, chaired by a member of the Board of Directors and supported by senior management, regularly reviews interdependencies between environmental and financial risks. These are further evaluated by the Early Risk Detection Committee to guarantee systematic monitoring and mitigation. Through this combined framework, Batıçim not only identifies and manages EDIROs but also strengthens long-term resilience and strategic decision-making by embedding both environmental and financial perspectives into its overall risk management process.

[Fixed row]

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

(2.3.1) Identification of priority locations

Select from:

☒ Yes, we have identified priority locations

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

Select all that apply

☒ Direct operations

☒ Upstream value chain

☒ Downstream value chain

(2.3.3) Types of priority locations identified

Sensitive locations

☒ Areas of limited water availability, flooding, and/or poor quality of water

(2.3.4) Description of process to identify priority locations

Batiçim has identified priority locations across its value chain, covering both direct operations and suppliers. We recognize that environmental dependencies, impacts, risks, and opportunities (EDIROs) extend beyond our own sites and include suppliers who provide critical inputs such as raw materials, fuels, and logistics services. Within our direct operations, cement plants in İzmir and Söke are identified as priority locations due to their heavy reliance on freshwater resources, increasing drought risks, and their strategic importance for production continuity. In addition, Batılman port facilities and energy generation sites are considered priority areas given their proximity to sensitive marine ecosystems, high freshwater needs, and their role in supporting exports and energy supply. For the supply chain, Batiçim prioritizes suppliers operating in regions of high water stress or ecological sensitivity, based on tools such as the WRI Aqueduct Water Risk Atlas, national water stress assessments, and IPCC climate scenarios (RCP 4.5 and 8.5). In 2024, 62 suppliers were assessed through WRI Aqueduct analysis: 1 supplier (2%) in extremely high stress regions, 37 suppliers (60%) in high stress regions, 14 suppliers (23%) in medium-high stress regions, and 10 suppliers (16%) in low-medium stress regions. This quantitative assessment ensures that environmental dependencies are systematically mapped and aligned with both environmental and financial materiality considerations under the TSRS Construction Materials Guide. To address these shared opportunities, Batiçim engages suppliers through sustainability criteria in procurement processes, encouraging water efficiency, waste reduction, and circular practices. Local suppliers are prioritized to reduce transportation-related impacts and support regional economies, while capacity-building initiatives help partners adopt more sustainable resource management practices. Oversight of these processes is provided by the Sustainability Committee and integrated into the Early Risk Detection Committee under the corporate risk management

framework. This ensures that opportunities across direct operations and suppliers are monitored holistically. By identifying shared priority locations across the value chain, Batiçim can coordinate mitigation strategies, strengthen resilience, and maximize opportunities for sustainable water and resource use.

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

Select from:

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

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

Baticim_Priority_Locations.pdf

[Fixed row]

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

Risks

(2.4.1) Type of definition

Select all that apply

☒ Qualitative

☒ Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:

☒ Revenue

(2.4.3) Change to indicator

Select from:

☒ % decrease

(2.4.4) % change to indicator

Select from:

- ☒ Less than 1%

(2.4.6) Metrics considered in definition

Select all that apply

- ☒ Time horizon over which the effect occurs
- ☒ Likelihood of effect occurring
- ☒ Other, please specify :magnitude of revenue

(2.4.7) Application of definition

At Batıçim, the financial impact of a risk is considered substantive when it exceeds 0.25% of the company's annual revenue, which is equivalent to approximately 33.6 million TRY, or when it results in potential production losses above an operationally adjusted threshold. Risks are assessed using a matrix that considers both the magnitude of the impact and the likelihood of occurrence, enabling a more granular classification. High Impact Risks: Events capable of causing a revenue change of $\geq 0.25\%$ and classified as having a high likelihood of occurrence (e.g., severe water scarcity or regulatory changes such as CBAM). Medium Impact Risks: Events resulting in a revenue change between 0.1% and 0.25%, with a medium-to-high likelihood of occurrence. Low Impact Risks: Events causing less than 0.1% revenue change, even if their likelihood is moderate. This classification ensures that high-probability, high-impact risks receive priority attention from management and that mitigation plans are integrated into operational and strategic processes. The company uses historical trend analysis and scenario modelling, aligned with IPCC climate scenarios to estimate the frequency, timeframe (short, medium, or long term), and severity of potential effects. Water-related risks are mapped against WRI Aqueduct high-stress regions, while carbon transition risks are assessed in the context of the EU Carbon Border Adjustment Mechanism (CBAM), where exports to EU markets are stress-tested under carbon price assumptions of €65/tCO₂, showing potential impacts equivalent to 1.81% of revenue. In addition to these transition and regulatory risks, downstream market dependencies are also material. Batıçim supplies the Turkish construction sector, where demand is increasingly shifting toward low-clinker and low-carbon cements. This creates both a risk—loss of competitiveness if product portfolios are not rapidly adapted—and an opportunity, as sustainable cement sales are projected to represent a growing share of domestic demand by 2030. Similarly, international customers, particularly in the EU, are expected to prefer products with lower embodied CO₂ to comply with CBAM-related reporting and cost pass-through. These downstream dynamics directly influence Batıçim's product development and R&D priorities, reinforcing the company's decision to scale up investments in alternative binders, blended cements, and low-carbon product lines. In 2024, six ESG-aligned projects were launched also

Opportunities

(2.4.1) Type of definition

Select all that apply

- ☒ Qualitative
- ☒ Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:

☒ Revenue

(2.4.3) Change to indicator

Select from:

☒ % increase

(2.4.4) % change to indicator

Select from:

☒ Less than 1%

(2.4.6) Metrics considered in definition

Select all that apply

☒ Time horizon over which the effect occurs

☒ Likelihood of effect occurring

☒ Other, please specify :magnitude of revenue

(2.4.7) Application of definition

At Batıçim, the financial impact of an opportunity is considered substantive when it exceeds 0.25% of annual revenue (~33.6 million TRY) or results in production gain above an operational threshold. Opportunities are assessed using a matrix that combines impact magnitude and likelihood, creating a three-tier classification: High Impact Opportunities ($\geq 0.25\%$ revenue change, high likelihood), Medium Impact Opportunities ($0.1\text{--}0.25\%$ revenue change, medium-to-high likelihood), and Low Impact Opportunities ($< 0.1\%$ revenue change, moderate likelihood). This structured approach ensures that high-probability, high-impact opportunities receive priority and are integrated into strategic and operational planning. Scenario modelling aligned with IPCC climate pathways and WRI Aqueduct water stress mapping informs short-, medium-, and long-term horizons. EU CBAM stress tests at $\text{€}65/\text{tCO}_2$ show potential financial effects of $\sim 1.8\%$ of revenue for exports to EU markets, which also highlight potential opportunities for low-carbon product positioning. In parallel, Batıçim identifies material climate-related opportunities, disclosed in the TSRS 2024 Report. Alternative Raw Materials: the use of industrial by-products and local inputs reduces clinker demand and CO_2 emissions. In 2024, alternative raw materials represented 8.1% of inputs, with benefits equal to 0.41% of revenue. Alternative Fuels: replacing fossil fuels with RDF and biomass reduces carbon dependency. In 2024, the share of alternative fuels reached 8.6% , with benefits of 0.32% of revenue. Green Finance: access to green bonds and sustainability-linked loans lowers financing costs. Scenario analysis shows potential positive impacts of 0.54% of revenue. These opportunities illustrate how Batıçim aligns transition actions with value creation, while responding to both regulatory requirements and market trends. Growing customer demand for low-clinker cement in Türkiye and the

EU represents not only a competitiveness challenge if adaptation lags, but also a significant opportunity to expand sustainable cement sales. The Sustainability Committee, chaired by senior executives and reporting to the Board, oversees opportunity identification and management. In 2024, six ESG-aligned projects were launched under departmental leadership, and bi-monthly monitoring ensured accountability and continuous improvement. In 2024, six ESG-aligned projects were launched under departmental leadership, and bi-monthly monitoring ensured

[Add row]

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

(2.5.1) Identification and classification of potential water pollutants

Select from:

☒ Yes, we identify and classify our potential water pollutants

(2.5.2) How potential water pollutants are identified and classified

At Batiçim, we have robust policies and processes in place to identify and classify potential water pollutants that may adversely affect water bodies and ecosystems. We monitor wastewater pollutant loads from our operations, regularly analyzing parameters such as Total Suspended Solids (TSS), Chemical Oxygen Demand (COD), Biochemical Oxygen Demand (BOD), pH, oil and grease through accredited laboratories every four months, in compliance with the Turkish Water Pollution Control Regulation and the requirements of local authorities such as İZSU. The permissible limits for BOD, COD, and TSS are defined in mg/L according to national regulations, with thresholds tailored to each sector. This monitoring system enables early detection of deviations from acceptable levels and facilitates rapid implementation of corrective measures. Additionally, at facilities located within Organized Industrial Zones, monthly analyses are carried out by the facility's own treatment plants, as required by the zone's management authority. In cases where measured values exceed regulatory limits, results are promptly reported to the relevant authority, and any applicable penalties or fees are implemented in line with the "polluter pays" principle. By integrating these multi-layered monitoring practices—quarterly accredited laboratory testing, monthly on-site analyses, and a clear escalation protocol for exceedances—Batiçim ensures the proactive management of wastewater discharges, minimization of harmful pollutants, protection of natural resources, and the safeguarding of surrounding ecosystems.

[Fixed row]

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

Row 1

(2.5.1.1) Water pollutant category

Select from:

- ☒ Other nutrients and oxygen demanding pollutants

(2.5.1.2) Description of water pollutant and potential impacts

Wastewater from cement production processes contains organic matter and suspended solids, contributing to increased biochemical and chemical oxygen demand (BOD, COD) in receiving water bodies. These pollutants can deplete dissolved oxygen levels, potentially disrupting aquatic ecosystems and harming biodiversity.

(2.5.1.3) Value chain stage

Select all that apply

- ☒ Other, please specify :domestic usage

(2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply

- ☒ Water recycling
- ☒ Discharge treatment using sector-specific processes to ensure compliance with regulatory requirements
- ☒ Upgrading of process equipment/methods

(2.5.1.5) Please explain

At Batiçim, we implement strict measures to minimize the adverse impacts of potential water pollutants on ecosystems and human health. Our operations fully comply with the Turkish Water Pollution Control Regulation, supported by advanced monitoring and treatment systems. All wastewater generated during cement production and related processes is treated on-site. Key water quality indicators — BOD, COD, TSS, and pH — are monitored through accredited laboratory analyses every four months, ensuring that discharges occur only after treatment and compliance with legal threshold values. In 2024, no exceedances were recorded. In our ready-mix concrete plants, where only physical treatment (sedimentation) is applied, industrial wastewater — such as water from site, mixer, and pump cleaning — is collected, settled, and the clarified water is reused in production. These facilities conduct the same accredited laboratory analyses every six months. This process reduces pollutant loads and prevents harmful substances from entering natural water resources. To further reduce freshwater withdrawal, we employ automated pH control systems, reverse osmosis units, and water recycling technologies. We also utilize rainwater harvesting ponds and conduct feasibility studies on alternative water sources to support resource efficiency. Sector-specific efficiency comparisons and risk assessments, such as those using the WRI Aqueduct Water Risk Atlas, guide our water management strategy.

[Add row]

C3. Disclosure of risks and opportunities

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

Climate change

(3.1.1) Environmental risks identified

Select from:

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

Water

(3.1.1) Environmental risks identified

Select from:

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

Plastics

(3.1.1) Environmental risks identified

Select from:

☒ No

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

Select from:

☒ Not an immediate strategic priority

(3.1.3) Please explain

We have evaluated our environmental risks as part of our comprehensive risk management framework, including potential risks related to plastics. Since we do not engage in the production or direct operational use of plastics, our interaction with plastic is limited to packaging waste from purchased goods. In 2024, we managed our waste in compliance with applicable environmental regulations, ensuring that recyclable packaging materials, including plastics, were properly sorted at the source and delivered to licensed recycling companies.

[Fixed row]

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

Climate change

(3.1.1.1) Risk identifier

Select from:

☒ Risk1

(3.1.1.3) Risk types and primary environmental risk driver

Policy

☒ Carbon pricing mechanisms

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☒ Downstream value chain

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☒ Turkey

(3.1.1.9) Organization-specific description of risk

Following Türkiye's ratification of the Paris Agreement and its 2053 net zero target, the regulatory framework is evolving rapidly. Operating in the energy- and emission-intensive cement sector, Batıçim is directly exposed to transition risks from carbon pricing, notably the forthcoming Türkiye Emission Trading System (ETS) and the EU Carbon Border Adjustment Mechanism (CBAM). Since 2024, carbon pricing has been systematically integrated into ESG risk assessments and scenario analyses. The phase-out of free allowances and the implementation of a carbon price are expected to increase operational and compliance costs, creating pricing pressures and affecting competitiveness in export markets. To mitigate these risks, Batıçim has established a low-carbon transition roadmap, targeting emission intensity reductions to 750/720 kgCO₂e by 2025, 660 by 2030, and 300 by 2053. Actions include kiln modernization, waste heat recovery (13% of electricity today, 20% by 2030), expanded use of alternative fuels (8.6% in 2024; 30% by 2030; 60% by 2053), and lower clinker ratios. In addition to transition risks, Batıçim faces organization-specific risks: uncertainty around Türkiye's ETS design, potential CBAM scope expansion, and stricter domestic regulations could raise costs.

(3.1.1.11) Primary financial effect of the risk

Select from:

☒ Increased indirect [operating] costs

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

Select all that apply

☒ Short-term

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

Select from:

☒ Very likely

(3.1.1.14) Magnitude

Select from:

☒ High

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

Batıçim operates in the energy- and emission-intensive cement sector and is therefore highly exposed to regulatory transition risks such as the forthcoming Türkiye Emission Trading System (ETS) and the EU Carbon Border Adjustment Mechanism (CBAM). These mechanisms will directly affect financial performance, cash flows,

and competitiveness by introducing new compliance costs and altering market dynamics. Assumptions: 2024 consolidated Scope 1 and Scope 2 emissions amounted to ~2.98 million tons CO₂e (2,835,209 Scope 1; 146,756 Scope 2). A domestic carbon price of USD 10/tCO₂e (TRY 35.22/USD) would imply a gross annual exposure of ~USD 743 thousand (TRY ~26,2 million) before free allocations. For EU exports, applying an EU ETS carbon price of €65/tCO₂e (TRY 36.74/EUR) would create (TRY ~ 243,4 million) additional costs depending on export volumes. These values are illustrative scenarios; actual financial impact will depend on final ETS allocation design, CBAM methodology, and exchange rate movements. Short term (0–3 years): The early years of ETS implementation and CBAM enforcement will increase compliance costs, even with partial free allocations. These costs are expected to reduce operating margins, increase working capital requirements, and put pressure on short-term cash flows. Exposure is particularly material given the cement sector's limited ability to pass through costs in domestic markets. Medium term (4–10 years): As free allocations phase out and carbon prices increase, compliance costs are projected to rise. At the same time, Batıçim will face significant capital expenditure requirements for its low-carbon transition roadmap, including kiln modernization, alternative fuel infrastructure, and expanded waste heat recovery capacity. These investments, while essential, may constrain cash flows and profitability in the medium term. Additionally, energy price volatility remains a financial risk, given that cement operations consumed 3,545,483 MWh of electricity in 2024, almost entirely within cement activities. Long term (11+ years): By successfully implementing its transition strategy, Batıçim expects to reduce emission intensity from 750/720 kgCO₂e per ton by 2025 to 660 by 2030 and 300 by 2053. Increasing the share of alternative fuels from 8.6% in 2024 to 30% in 2030 and 60% in 2053, along with lowering clinker ratios and expanding WHR systems (from 13% of electricity demand today to 20% by 2030), will mitigate exposure to carbon pricing.

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

Select from:

☒ Yes

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

243430547

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

328786247

(3.1.1.25) Explanation of financial effect figure

The financial impact figures represent Batıçim's estimated carbon costs under Türkiye's forthcoming Emission Trading System (ETS). Calculations are based on the company's 2024 consolidated Scope 1 and Scope 2 emissions, which amounted to approximately 2,981,964 tons of CO₂e (2,835,209 Scope 1; 146,756 Scope 2). Assuming a domestic carbon price of USD 10/tCO₂e (TRY 35.22/USD), and applying illustrative free allocation rates of 97.5% in Year 1 and 90% in Year 3, the potential short-term compliance cost is estimated to range between TRY 243.4 million and TRY 328.8 million. For EU exports, applying an EU ETS carbon price of €65/tCO₂e (TRY 36.74/EUR) would create additional costs depending on export volumes. These figures are scenario-based and may vary depending on the final ETS design, free allocation methodology, and exchange rate movements. Such rising costs are expected to exert pressure on operating margins and cash flows, particularly in the energy- and emission-intensive cement sector. To mitigate these risks, Batıçim has developed a low-carbon transition roadmap aligned with Türkiye's 2053 net zero target. The company aims to reduce emission intensity to 750 kgCO₂e at Batıçim and 720 kgCO₂e at Batisöke by 2025, 660 by 2030, and

300 by 2053. Actions include kiln modernization, expansion of waste heat recovery systems (currently covering 13% of electricity consumption, targeted at 20% by 2030), increased use of alternative fuels (8.6% in 2024; 30% by 2030; 60% by 2053), and lowering clinker ratios by using alternative raw materials. Batıçim also continues to monitor the development of carbon capture and storage (CCS) technologies for potential future applicability.

(3.1.1.26) Primary response to risk

Infrastructure, technology and spending

☑ Increase investment in R&D

(3.1.1.27) Cost of response to risk

710000000

(3.1.1.28) Explanation of cost calculation

The total estimated cost of response is ~TRY 710 million, combining both OPEX and CAPEX measures. Annual R&D expenditures of ~TRY 5,377 million cover projects on low-carbon cements, fuel switching, digital control systems, waste heat recovery, and alternative raw materials, supporting incremental innovation and regulatory alignment. In addition, a major CAPEX investment of ~TRY 704 million has been committed for the establishment of a Refuse-Derived Fuel (RDF) Preparation and Feeding Facility at the Batisöke Cement Plant. This project includes infrastructure, equipment, and technology adaptation to reduce CO₂e emissions, enhance energy efficiency, and ensure compliance with Türkiye's ETS framework. Together, these expenditures reflect Batıçim's integrated approach to mitigating transition risks, balancing short-term operational improvements with long-term structural decarbonization, and strengthening competitiveness in both domestic and EU markets.

(3.1.1.29) Description of response

To mitigate the financial and operational risks arising from the implementation of Türkiye's ETS and the EU CBAM, Batıçim has committed approximately TRY 710 million in response measures, combining both capital investments (CAPEX) and operational expenditures (OPEX). This includes the establishment of a robust MRV system, R&D activities on low-carbon clinker alternatives, and process optimization initiatives. A major share of this cost relates to the construction of a Refuse-Derived Fuel (RDF) Preparation and Feeding Facility at the Batisöke Cement Plant (~TRY 704 million CAPEX), designed to reduce fossil fuel dependency and cut emissions. In addition, annual R&D expenditures (~TRY 5,377 million OPEX) support innovation in low-carbon cements, fuel diversification, digital control systems, waste heat recovery, and alternative raw materials. Further measures involve scaling up waste heat recovery (currently 13% of electricity consumption, targeted 20% by 2030), expanding renewable electricity use, and lowering clinker ratios. Batıçim also continues to monitor carbon capture and storage (CCS) as a potential long-term decarbonization pathway. Collectively, these investments and operational strategies aim to lower exposure to rising carbon costs, strengthen compliance with evolving regulations, and safeguard long-term competitiveness in both domestic and EU markets.

Water

(3.1.1.1) Risk identifier

Select from:

☒ Risk1

(3.1.1.3) Risk types and primary environmental risk driver

Acute physical

☒ Drought

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☒ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☒ Turkey

(3.1.1.7) River basin where the risk occurs

Select all that apply

☒ Other, please specify :gediz and menderes

(3.1.1.9) Organization-specific description of risk

According to national water stress analyses and IPCC climate scenarios (RCP 4.5 and RCP 8.5), Batıçim's key operating regions such as İzmir and Söke are exposed to high water stress, declining availability, and increasing drought risk. Given the essential role of freshwater in cement production, water scarcity is classified as a significant chronic physical risk. Batıçim prioritizes high-risk and ecologically sensitive sites across its value chain and assesses site-specific dependencies, including water availability, flood potential, and biodiversity sensitivity. Scenario-based evaluations are used to guide adaptation pathways, targeted investments, and operational measures. Actions include strengthening water monitoring systems, implementing R&D-driven efficiency projects, promoting rainwater harvesting and wastewater reuse where feasible, and optimizing processes to reduce freshwater withdrawals. Employees are regularly trained to raise awareness of water risks and opportunities, reinforcing organizational capacity to respond. Governance of water-related risks is integrated into the company's ESG risk management framework, overseen by the Sustainability Committee and Early Risk Detection Committee, ensuring accountability and alignment with long-term

resilience objectives. These measures collectively aim to reduce Batıçım's exposure to water-related financial and operational risks, safeguard ecosystems, and maintain competitiveness under worsening drought conditions.

(3.1.1.11) Primary financial effect of the risk

Select from:

☒ Increased production costs

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

Select all that apply

☒ Medium-term

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

Select from:

☒ Likely

(3.1.1.14) Magnitude

Select from:

☒ High

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

The financial impact of water scarcity risk for Batıçım is estimated by evaluating the potential additional costs of securing external water supply in high water-stress regions such as İzmir and Söke, which are critical locations for cement production. Currently, most freshwater used in operations is sourced from on-site or locally available resources without direct purchase costs. However, under prolonged drought or reduced availability scenarios, Batıçım may need to procure water externally, leading to significantly higher operating costs, reduced profitability, and cash flow pressure. Our water risk assessment indicates that approximately 0.32% of annual revenue (based on 2024 figures) could be affected by water scarcity. While this share may appear limited, for a water-dependent sector such as cement it represents a material burden. Costs extend beyond direct procurement to include water transport, treatment, and infrastructure upgrades. Indirect impacts could arise from production slowdowns, supply chain disruptions, and potential regulatory penalties in cases of non-compliance. Over the medium term (4–10 years), these effects could narrow margins and strain liquidity, especially as climate scenarios (RCP 4.5 and RCP 8.5) forecast heightened drought frequency in Western Türkiye. In such conditions, external procurement could become recurrent rather than exceptional, driving up annualized costs and reducing competitiveness, particularly in export markets. To address these risks, Batıçım integrates water considerations into ESG risk assessments and scenario analyses. Measures include strengthening

monitoring systems, investing in R&D for water efficiency, implementing process optimization to reduce withdrawals, and developing adaptation pathways for drought scenarios. By quantifying potential financial impacts and linking them to performance, Batıçim ensures water risks are systematically managed and resources allocated to safeguard resilience and long-term competitiveness.

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

Select from:

☒ Yes

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

42560242

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

122999099

(3.1.1.25) Explanation of financial effect figure

Using IPCC WGI Interactive Atlas projections, a 10% decrease in precipitation is anticipated in Batıçim's operational regions, including İzmir and Söke, during the 2021–2040 period. These areas are critical for cement production, where freshwater plays an essential role in clinker and cement processes. Reduced precipitation and declining water availability therefore represent a chronic physical risk with potentially significant financial implications. In 2024, Batıçim's consolidated water consumption was 1,580,989 m³. Under climate stress scenarios, a portion of this demand would need to be met through external procurement due to shortages in existing sources. Applying the 2024 İzmir industrial water tariff (İZSU) of 269,2 TRY/m³, the estimated additional costs range from TRY 42.6 million (USD ~1.2 million at 35.22 TRY/USD) under the minimum scenario to TRY 123 million (USD ~3.5 million) under the maximum scenario. These estimates reflect direct sourcing costs only; additional financial impacts could arise from transportation, treatment, and infrastructure upgrades required to secure supply. Our water risk assessment indicates that up to 0.32% of annual revenue could be affected by water scarcity. While this proportion may appear modest, in the capital- and water-intensive cement sector it represents a material risk. Beyond direct costs, drought conditions could also lead to operational slowdowns, supply chain disruptions, or regulatory penalties, compounding the financial impact. Over the medium term, sustained drought could transform water procurement from an exceptional measure into a recurring cost, thereby reducing margins and liquidity while eroding competitiveness in both domestic and EU markets. To mitigate these risks, Batıçim integrates water stress analyses into its ESG risk management framework. Actions include strengthening monitoring systems, implementing R&D-driven efficiency projects, optimizing processes to minimize freshwater withdrawal, and developing adaptation pathways for drought scenarios, including evaluation of external supply options. Governance is ensured through the Sustainability and Environment Departments, site management teams, and oversight by the Sustainability Committee, ensuring accountability and timely adaptation. By quantifying the financial implications of water scarcity and embedding them into decision-making, Batıçim ensures resilience to physical climate risks while safeguarding long-term competitiveness.

(3.1.1.26) Primary response to risk

Compliance, monitoring and targets

☒ Establish site-specific targets

(3.1.1.27) Cost of response to risk

3500000

(3.1.1.28) Explanation of cost calculation

Planned investment to address water-related risks is the replacement and commissioning of digital water meters to improve monitoring and efficiency. The cost is estimated at €70,000 (approximately TRY 3,5 million, based on the company's 2025 exchange rate assumption)

(3.1.1.29) Description of response

Batiçim's water risk management activities address both operational resilience and long-term adaptation to climate-related challenges. Measures include the integration of real-time monitoring systems to track consumption and detect anomalies, the execution of regular scenario analyses to anticipate drought and flood risks, and the prioritization of high-risk sites for targeted interventions. Methodologies are continuously refined in line with international best practices and national water stress analyses, ensuring adaptability to evolving risks. Employees across all sites are regularly trained on interconnected water-related risks and opportunities, strengthening organizational awareness and response capacity. Site-level measures such as rainwater harvesting and wastewater reuse are implemented where feasible to reduce dependence on freshwater withdrawals. These investments and strategies reflect a proactive approach to minimizing the physical and financial impacts of water scarcity. By combining monitoring, forecasting, efficiency improvements, and employee engagement, Batiçim embeds water-related risks into its ESG risk assessments and ensures that mitigation actions are aligned with long-term business resilience and competitiveness.

Climate change

(3.1.1.1) Risk identifier

Select from:

☒ Risk2

(3.1.1.3) Risk types and primary environmental risk driver

Chronic physical

☒ Sea level rise

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☒ Downstream value chain

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☒ Turkey

(3.1.1.9) Organization-specific description of risk

Sea level rise resulting from climate change poses a long-term chronic physical risk to Batıçim's logistics hub, Batılman, located on the Aegean coast. According to IPCC RCP 4.5 and RCP 8.5 projections, substantial increases in sea levels are expected in the coming decades, heightening the likelihood of flooding, storm surges, and coastal erosion. These impacts could damage port infrastructure, disrupt clinker and cement exports, create bottlenecks in logistics flows, and indirectly slow down production. The resulting interruptions would exert pressure on revenues, profitability, and cash flows, while reducing competitiveness in international markets. Batıçim integrates port-related climate risks into its ESG risk management framework and scenario analyses. The Sustainability Committee and Early Risk Detection Committee oversee these risks, ensuring governance and accountability. Strategic measures under consideration include assessing port infrastructure resilience, planning targeted investments in flood- and erosion-resilient structures, and developing alternative transport routes to maintain export continuity. Collaboration with local authorities and stakeholders is also recognized as essential to safeguard logistics operations. By embedding sea level rise considerations into strategic planning and risk management, Batıçim aims to reduce vulnerability to climate-related disruptions, protect export revenues, and ensure long-term operational resilience and competitiveness.

(3.1.1.11) Primary financial effect of the risk

Select from:

☒ Increased indirect [operating] costs

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

Select all that apply

☒ Long-term

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

Select from:

☒ Very likely

(3.1.1.14) Magnitude

Select from:

☒ High

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

The projected rise in sea level poses a significant long-term physical risk for Batıçim, with direct financial implications for Batılman Port, the company's primary logistics hub, and for Batıbeton's Çiğli plant. Climate scenarios (RCP 4.5 and RCP 8.5) indicate substantial increases in sea level over the next decades, raising the likelihood of flooding, storm surges, and infrastructure damage. For Batılman, even temporary disruptions could delay clinker and cement exports, reduce revenues, erode profit margins, and strain cash flows. At the Çiğli plant, flooding or restricted access could lead to production delays, compounding negative financial impacts. Beyond revenue losses, sea level rise is expected to increase expenditures on coastal protection, infrastructure upgrades, and alternative logistics routes. Such measures may be essential to maintain operations but would substantially raise operating costs. Over the long term, this could narrow margins, weaken liquidity, and require significant capital allocation to protect key logistics and production assets. Without such investments, Batıçim's financial stability and competitive position in both domestic and export markets could be undermined. To address these risks, Batıçim integrates sea level rise into ESG risk assessments and long-term strategy. Management priorities include evaluating port capacity under extreme climate scenarios, developing contingency plans for alternative logistics routes, and assessing the feasibility of flood- and erosion-resilient infrastructure investments. Collaboration with local authorities and stakeholders is also pursued to ensure coordinated coastal adaptation. Through proactive planning and targeted capital investment, Batıçim aims to safeguard export continuity, reduce financial volatility, and maintain long-term resilience under worsening climate conditions.

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

Select from:

☒ Yes

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

58291564

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

134402050

(3.1.1.25) Explanation of financial effect figure

Sea level rise poses a material long-term physical risk for Batıçim, particularly at Batılman Port, the company's main export hub, and at Batıbeton's Çiğli facility. IPCC RCP 4.5 and RCP 8.5 scenarios project a rise of around 0.1 meters in the Aegean region by 2040. Even this moderate increase significantly elevates flooding and storm surge risks, threatening coastal infrastructure and leading to potential shutdowns or delays. The baseline estimate of potential financial impact corresponds to 0.43% of Batıçim's 2024 consolidated revenue (TRY 13.44 billion), equal to approximately TRY 58.3 million. This figure reflects expected revenue losses from temporary interruptions in clinker and cement exports due to port disruptions, alongside operational slowdowns at the Çiğli plant. Additional costs could arise from emergency logistics, delivery delays, and reputational risks in international markets. In a high-impact scenario, where sea level rise triggers prolonged downtime, port infrastructure damage, and reliance on more costly alternative transport routes, the financial impact could reach 1% of annual revenue, or about TRY 134.4 million. These outcomes would materially reduce profitability, weaken cash flow resilience, and require significant capital reallocation to coastal protection and resilient infrastructure. To mitigate these risks, Batıçim integrates sea level rise into ESG risk assessments and long-term scenario planning. Actions include evaluating Batılman's resilience under extreme climate projections, developing contingency plans for alternative export routes, and assessing investments in flood- and erosion-resilient infrastructure. Collaboration with local authorities and stakeholders is prioritized to strengthen regional logistics continuity. By quantifying these financial risks and embedding them into strategic planning, Batıçim aims to safeguard export competitiveness, protect financial stability, and ensure resilience under worsening climate conditions.

(3.1.1.26) Primary response to risk

Infrastructure, technology and spending

☑ Improve maintenance of infrastructure

(3.1.1.27) Cost of response to risk

70000000

(3.1.1.28) Explanation of cost calculation

According to Batıçim's internal engineering assessments, the financial exposure to sea level rise at Batılman has been evaluated based on site-specific conditions rather than international benchmarks. The current clearance between the jetty and the sea level is approximately 4–4.5 meters. A potential 10 cm rise in sea level is therefore not expected to create immediate operational disruption, yet it is recognized as a long-term risk that requires mitigation. In 2024, Batıçim proactively implemented a jetty extension project, with a total investment of approximately ~USD 24 million. As part of this project, the engineering team carried out a scenario analysis to estimate the cost of addressing incremental sea level rise impacts. Their analysis indicates that mitigating a 10 cm rise in sea level would entail an additional adaptation cost equivalent to ~USD 2.4 million, representing roughly 10% of the jetty extension investment.

(3.1.1.29) Description of response

Batiçim is developing a comprehensive adaptation strategy to strengthen the resilience of its critical logistics hub, Batiliman, against long-term sea level rise and coastal flooding risks. Planned measures focus on protecting port infrastructure, safeguarding critical assets, and ensuring the continuity of clinker and cement exports. Key actions include the redesign and elevation of quay and jetty structures to withstand higher sea levels and storm surges, along with the reinforcement of coastal protection systems through breakwater crest raising and armor renewal. To manage heavy rainfall and flooding events, Batiçim plans the installation of stormwater pumping systems and backflow prevention mechanisms, reducing the likelihood of prolonged downtime. Critical assets located in vulnerable zones, such as low-lying electrical infrastructure and loading equipment, will either be protected in situ or relocated to elevated areas to minimize damage and operational disruptions. This monitoring capability will be coupled with a structured contingency plan, including the use of alternative logistics routes and emergency response protocols, to maintain export continuity even during disruption scenarios. These measures collectively aim to reduce operational downtime, safeguard export revenues, and enhance the resilience of port operations. By combining engineering upgrades, asset protection, Batiçim ensures that Batiliman remains capable of supporting long-term logistics needs under worsening climate conditions. The proactive planning also supports regulatory compliance, ESG commitments, and the protection of the company's long-term competitiveness in international markets.

[Add row]

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

Climate change

(3.1.2.1) Financial metric

Select from:

☒ Revenue

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

243430547

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

Select from:

☒ 1-10%

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

257000000

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

Select from:

☒ 1-10%

(3.1.2.7) Explanation of financial figures

The financial figures represent Batıçim's estimated exposure to both transition and physical climate risks. Transition risks: The estimated figure reflects compliance costs under Türkiye's Emission Trading System (TR ETS) and the EU Carbon Border Adjustment Mechanism (CBAM). The calculation is based on the company's 2024 Scope 1 and Scope 2 GHG emissions (2,970,090 tCO₂e) multiplied by assumed carbon prices of USD 10/tCO₂e (TR ETS) and EUR 65/tCO₂e (EU ETS), with exchange rates of 35.22 TRY/USD and 36.74 TRY/EUR. After applying free allowance rates (97.5% in year 1, 95% in year 2, 90% in year 3), the short-term annual financial effect is estimated at TRY 243.4 million, equal to ~1.8% of 2024 revenue (TRY 13.44 billion). Physical risks: The estimated figures reflect additional costs associated with chronic physical risks such as water scarcity and sea level rise. For water risk, the assessment assumes external procurement of freshwater in İzmir and Söke under IPCC RCP 4.5 and 8.5 scenarios, using 2024 water consumption (1,580,989 m³) and the İzmir industrial tariff (TRY 269,2/m³). The additional cost is estimated between TRY 42.6–123 million. For sea level rise, the assessment assumes 0.1m rise by 2040 in the Aegean region, leading to operational disruptions at Batılman and Çiğli. Revenue-at-risk is estimated between TRY 58.3–134.4 million, based on 2024 revenue. Combined, the potential financial effect of physical risks is ~TRY 101–257 million, representing 0.7–1.9% of revenue. These figures provide an indicative quantification of Batıçim's financial exposure to climate-related risks. Transition risks represent direct compliance cost burdens, while physical risks reflect potential increases in operating costs, revenue losses, and capital expenditures. Both sets of estimates are integrated into Batıçim's ESG risk management and scenario analysis, guiding investment in energy efficiency, fuel substitution, resilient infrastructure, and water efficiency projects to mitigate impacts and safeguard financial resilience.

Water

(3.1.2.1) Financial metric

Select from:

☒ Revenue

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

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

Select from:

☒ Less than 1%**(3.1.2.4) Amount of financial metric vulnerable to physical risks for this environmental issue (unit currency as selected in 1.2)**

58291564

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

Select from:

☒ Less than 1%**(3.1.2.7) Explanation of financial figures**

The financial figure reflects the estimated annual cost impact of potential water scarcity and drought risk on Batıçim's operations. Based on 2024 consolidated revenue of TRY 13,440,205 thousand and an assumed impact rate of 0.32%, the projected exposure amounts to approximately TRY 42.56 million. This estimate is grounded in IPCC WGI Interactive Atlas data, which indicates around a 10% decrease in precipitation in Western Türkiye (2021–2040, RCP 4.5 and RCP 8.5). In a severe scenario, with up to 28.9% reduction in water availability, financial impacts could escalate significantly. The estimate includes costs for external water procurement under drought conditions, as well as potential additional expenses from operational disruptions, reduced production efficiency, and downtime. These risks represent a material long-term physical impact on profitability and cash flow. To mitigate these risks, Batıçim has adopted a comprehensive approach, including digital water monitoring systems, R&D-driven efficiency projects, rainwater harvesting, and wastewater reuse at selected facilities. Scenario-based risk assessments and cooperation with local authorities further support sustainable water management in high-stress regions. By linking quantified financial impacts to mitigation strategies, Batıçim ensures resilience against climate-induced water risks and alignment with long-term ESG and capital planning processes.

Climate change**(3.1.2.1) Financial metric**

Select from:

☒ Revenue

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

0

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

Select from:

☒ Less than 1%

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

58291564

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

Select from:

☒ Less than 1%

(3.1.2.7) Explanation of financial figures

The financial figure reflects the estimated impact of projected sea level rise on Batıçim's coastal facilities, especially Batılman Port and Batıbeton's Çiğli plant. According to IPCC RCP 4.5 and 8.5 scenarios, sea levels in the Aegean are expected to rise by approximately 0.1 meters by 2040, increasing risks of flooding, storm surges, and coastal erosion. Based on 2024 consolidated revenue of TRY 13,440,205 thousand, the potential financial impact is estimated at TRY 58.3 million (0.43% of revenue) under the baseline scenario and up to TRY 134.4 million (1% of revenue) under a high-impact scenario. These figures represent anticipated revenue losses from clinker and cement export interruptions at Batılman, production delays at the Çiğli plant, and additional expenditures for emergency logistics, equipment relocation, and potential reputational impacts in export markets. Over the long term, such disruptions would weaken profitability and liquidity, while requiring substantial capital allocation for coastal protection and resilient infrastructure. To mitigate these risks, Batıçim integrates sea level rise into ESG risk assessments and scenario planning, evaluates port resilience under extreme projections, develops contingency plans for alternative logistics routes, and considers investments in flood- and erosion-resilient infrastructure in coordination with local authorities. Transition risks related to sea level rise are assessed as non-material and therefore estimated at zero.

[Add row]

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

Row 1

(3.2.1) Country/Area & River basin

Afghanistan

☒ Other, please specify :Turkey / Gediz & Menderes

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

Select all that apply

☒ Direct operations

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

5

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

Select from:

☒ 100%

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

Select from:

☒ 100%

(3.2.11) Please explain

All of the organization's production and related facilities (Batıçim, Batısöke, Batıbeton, Batılıman, and Batıçim Enerji) are located within the same river basin in Western Türkiye, which is classified as a medium-to-high water stress zone. This means that 100% of global revenue is exposed to water-related risks. In 2024, Batıçim's consolidated freshwater consumption was approximately 1.58 million m³, with water scarcity identified as a chronic physical risk under IPCC RCP 4.5 and

RCP 8.5 scenarios projecting up to a 10% decline in precipitation by 2040. Scenario analyses suggest that water scarcity could affect up to 0.32% of annual revenue, equivalent to TRY 42.6–123 million, primarily through increased procurement costs, operational slowdowns, and infrastructure adaptation needs. The fact that all facilities are concentrated in the same stressed basin amplifies vulnerability, underscoring the strategic importance of proactive water risk management and efficiency investments.

[Add row]

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

(3.3.1) Water-related regulatory violations

Select from:

☒ No

(3.3.3) Comment

In the reporting year, our organization did not incur any fines, enforcement orders, or other penalties related to water regulatory violations. Batıçim maintains strict adherence to all applicable national and local water regulations, permitting requirements, and discharge standards. Compliance is ensured through continuous monitoring, periodic audits, and integration of regulatory obligations into site-level management systems. In addition, our sustainability and environment teams regularly engage with regulators and local stakeholders to align operations with evolving water-related legislation and basin-level management plans. This proactive approach not only prevents non-compliance risks but also supports responsible water stewardship, ensuring that operations remain resilient in regions with medium-to-high water stress.

[Fixed row]

(3.5) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?

Select from:

☒ No, but we anticipate being regulated in the next three years

(3.5.4) What is your strategy for complying with the systems you are regulated by or anticipate being regulated by?

With the enactment of Türkiye's Climate Law in 2025 and the launch of the national Emission Trading System (ETS), alongside the EU Carbon Border Adjustment Mechanism (CBAM), Batıçim faces increasing transition risks. As one of Türkiye's leading cement producers, the company operates in a highly emission-intensive

sector that is directly exposed to carbon pricing and tightening climate regulations. Without proactive adaptation, compliance costs and competitiveness pressures, particularly in EU export markets, would significantly increase. To manage these risks, Batıçim has embedded climate considerations into its corporate strategy, investment planning, and ESG risk assessments. The company has established an ETS-aligned Monitoring, Reporting and Verification (MRV) system, scaled up energy efficiency projects, and invested in alternative fuel infrastructure, including a Refuse-Derived Fuel (RDF) facility. In parallel, Batıçim is developing low-carbon clinker and cement products to preserve EU market access under CBAM. Financial scenario analyses assume a baseline carbon price of €5–10/ton CO₂ under EU ETS and USD 10/ton CO₂e under Türkiye's ETS, with gradually reduced free allowances (97.5% in year 1, 95% in year 2, 90% in year 3). These assumptions suggest material exposure, estimated at TRY 243–329 million over the first three years of ETS implementation. Export-related liabilities are expected to rise once CBAM transitions from reporting-only to full financial obligations. Batıçim addresses these challenges by integrating carbon pricing exposure into capital allocation, product development, and risk management. Key measures include: Energy efficiency and waste heat recovery investments (targeting 20% electricity coverage by 2030). Increased use of alternative fuels (30% by 2030, 60% by 2053). Reducing clinker ratios through alternative raw materials. Developing low-carbon products with enhanced carbon footprint reporting for EU compliance. Exploring sustainable financing instruments (green bonds, EU climate funds). By aligning its transition strategy with Türkiye's ETS and CBAM, Batıçim strengthens resilience, safeguards profitability, and maintains long-term competitiveness in domestic and EU markets, while contributing to national net-zero targets.

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

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

[Fixed row]

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

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☒ Opp1

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Energy source

☒ Use of low-carbon energy sources

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☒ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☒ Turkey

(3.6.1.8) Organization specific description

The increased use of alternative raw materials in cement and clinker production provides Batıçım with a significant opportunity to reduce both energy consumption and CO₂ emissions while lowering reliance on conventional raw materials such as limestone and fossil fuel-intensive additives. This approach contributes to measurable cost savings by decreasing the energy intensity of production and limiting exposure to volatile raw material prices, while simultaneously advancing environmental performance. By incorporating industrial by-products and secondary raw materials, the company not only reduces the carbon footprint of its products but also supports circular economy practices that create long-term value across the supply chain. From a strategic perspective, greater adoption of alternative raw materials directly strengthens Batıçım's low-carbon transition pathway. It enhances alignment with Türkiye's upcoming Emission Trading System (ETS) and the European Union's Carbon Border Adjustment Mechanism (CBAM), both of which place increasing pressure on energy- and emission-intensive industries. Reducing process emissions through material substitution helps mitigate future carbon cost liabilities, thereby protecting competitiveness in both domestic and export markets. In addition, investments in R&D and partnerships with local suppliers are enabling the scaling of innovative low-carbon raw material solutions, which reinforce operational resilience and position Batıçım as a leader

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☒ Reduced direct costs

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

Select all that apply

☒ Medium-term

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

Select from:

☒ Very likely (90–100%)

(3.6.1.12) Magnitude

Select from:

☒ High

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

In 2024, alternative raw material usage accounted for 8.6% of total inputs, corresponding to a potential positive financial effect equivalent to 0.41% of total revenue. This shift represents a tangible opportunity for Batıçim to reduce dependency on conventional, carbon-intensive raw materials such as limestone, while achieving measurable cost savings. The increased use of alternative raw materials and low-carbon energy sources is expected to lower raw material procurement costs, reduce overall operational expenses, and improve profit margins. These financial savings will have a positive effect on cash flows, enhance financial flexibility, and create resources to support investments in sustainable growth and innovation. Beyond direct cost reductions, the substitution of alternative raw materials contributes significantly to lowering CO₂ emissions. By decreasing process emissions, Batıçim directly reduces exposure to future carbon pricing liabilities under Türkiye's forthcoming Emission Trading System (ETS) and the European Union's Carbon Border Adjustment Mechanism (CBAM). This strengthens long-term competitiveness, particularly in export markets where carbon intensity is becoming a key determinant of market access and pricing. Operationally, this approach also enhances resilience by diversifying supply chains and integrating circular economy principles through the use of industrial by-products and secondary materials. Such practices not only mitigate raw material price volatility but also foster stronger relationships with local suppliers, thereby embedding sustainability and value creation throughout the value chain. Strategically, Batıçim complements alternative raw material use with investments in R&D to expand the range of feasible low-carbon inputs. Pilot projects focus on testing innovative substitutes and scaling their integration into production processes without compromising quality standards. In parallel, increased deployment of low-carbon energy sources further amplifies the emission reduction benefits, positioning the company as a frontrunner in sustainable cement manufacturing. By quantifying the positive financial effect and embedding these practices into its decarbonization strategy, Batıçim demonstrates how climate-aligned

resource efficiency can deliver both economic and environmental value. These initiatives support compliance with evolving regulations while ensuring operational resilience in a carbon-constrained economy

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

Select from:

☒ Yes

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

55236482

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

102289782

(3.6.1.23) Explanation of financial effect figures

The potential financial effect of increasing the use of alternative raw materials was estimated based on the consolidated revenue of Batıçim and Batısöke in 2024. According to the sustainability report, the expected positive impact corresponds to 0.41% of revenue. This translates into a medium-term financial effect range between TRY 55.2 million and TRY 102.3 million. The calculation considers the cost savings resulting from reduced raw material procurement costs and operational expenditures, together with improved profit margins due to the substitution of conventional raw materials with alternative inputs. In 2024, alternative raw materials represented approximately 8.1% of total inputs. Under a conservative scenario, maintaining this level provides measurable financial benefits, whereas under an enhanced scenario with increased substitution up to 15%, the positive financial effect could reach the maximum estimate. These savings are expected to strengthen cash flows, improve financial flexibility, and create resources for investments in sustainable growth. Furthermore, by lowering CO₂ emissions, the organization reduces potential liabilities under upcoming carbon pricing mechanisms such as Türkiye ETS and EU CBAM, thereby reinforcing competitiveness in both domestic and export markets.

(3.6.1.24) Cost to realize opportunity

55236482

(3.6.1.25) Explanation of cost calculation

The cost to realize the opportunity has been estimated based on the proportion of the potential financial impact relative to the company's total revenue, as disclosed in the TSRS 2024 report. Using the reported consolidated revenue figure, a 0.41% impact corresponds to approximately TRY 55.2 million. This estimate reflects the anticipated savings derived from reduced raw material consumption and lower operational costs through the increased use of alternative raw materials. Such savings

are expected to improve cash flows, strengthen profitability, and enhance the company's long-term financial resilience. Furthermore, by reducing the dependency on conventional raw materials, the company mitigates supply and cost volatility risks while simultaneously contributing to its decarbonization strategy. These outcomes not only create financial flexibility to support future sustainability investments but also improve competitiveness under emerging carbon pricing mechanisms such as the Türkiye ETS and EU CBAM.

(3.6.1.26) Strategy to realize opportunity

The company plans to increase the use of alternative raw materials in cement and clinker production to reduce reliance on traditional raw materials, lower energy consumption, and decrease CO₂ emissions. This strategy is designed to align with Türkiye's upcoming Emission Trading System (ETS) and the European Union's Carbon Border Adjustment Mechanism (CBAM), both of which will increase the financial burden of carbon-intensive production. By enhancing waste material utilization, sourcing locally available inputs, and optimizing supply chain relationships to prioritize low-carbon procurement, the company is working to improve operational sustainability and reduce its exposure to regulatory and market risks. Implementation measures include upgrading production infrastructure to handle alternative inputs, adapting operational processes to maintain product quality, and strengthening collaborations with suppliers to ensure consistent availability and reliability of alternative materials. Research and development activities support product innovation by integrating low-carbon materials without compromising performance standards, thereby supporting long-term decarbonization objectives. This approach also creates financial opportunities. According to the TSRS 2024 report, the increased use of alternative raw materials is expected to generate savings equivalent to approximately 0.41% of total consolidated revenue, which corresponds to around TRY 55.2 million. These savings derive from reduced raw material procurement costs and lower operational expenses, which will in turn strengthen profitability, improve cash flows, and provide resources to support future sustainability investments. In addition to cost reductions, this transition improves resilience by reducing dependency on conventional raw materials that are subject to global supply and price volatility. It also strengthens competitiveness in both domestic and export markets, particularly under CBAM requirements for traceability and low-carbon products. By proactively implementing these measures, the company not only advances its low-carbon transition strategy but also positions itself as a leader in sustainable cement production, improving long-term financial resilience and ensuring continued market access under evolving climate policies.

Water

(3.6.1.1) Opportunity identifier

Select from:

☒ Opp1

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Resource efficiency

☒ Reduced water usage and consumption

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☒ Downstream value chain

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☒ Turkey

(3.6.1.6) River basin where the opportunity occurs

Select all that apply

☒ Other, please specify :menderes, gediz

(3.6.1.8) Organization specific description

Within the consolidated operations of Batıçim Group, water-intensive activities are concentrated in the cement plants at Batıçim (İzmir) and Batısöke (Söke). At these facilities, efficient and responsible water management is a strategic priority. Closed-loop cooling systems enable recovery across production lines, significantly reducing freshwater demand, while rainwater harvesting ponds provide additional reuse capacity for irrigation and auxiliary operations. In 2025, the “DamlaDamlaGeleceğe” project was launched to expand monitoring, improve data reliability, and identify new opportunities for conservation, positioning these plants toward best-in-class water efficiency performance in the cement sector. Additional initiatives include reducing consumption at the waste-heat-to-electricity generation plant, reinforcing resilience against growing water stress risks. While other subsidiaries such as Batıbeton, Batılıman, and Batıçim Enerji have relatively lower water intensity, targeted efficiency measures are being integrated across operations to minimize consumption, ensure compliance, and enhance sustainability performance. Collectively, these practices reduce environmental impacts, generate cost savings, and strengthen long-term competitiveness under increasing water stress. Primary financial effect of the opportunity is Reduced direct costs. By lowering freshwater procurement needs at water-intensive cement operations and enhancing efficiency across the group

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☒ Reduced indirect (operating) costs

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

Select all that apply

☒ Medium-term

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

Select from:

☒ Very likely (90–100%)

(3.6.1.12) Magnitude

Select from:

☒ High

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

At Batıçim and Batisöke cement plants, which represent the most water-intensive operations of the Group, the company has set a target to reduce specific water consumption from 0.29 m³/ton to 0.25 m³/ton by 2030, equal to a 13% reduction. In 2024, consolidated water consumption at these plants was 1,159,680 m³. Using the İzmir industrial water tariff (İZSU) of 269.2 TRY/m³, this improvement corresponds to an estimated annual financial saving of TRY 40.6 million (≈0.3% of 2024 consolidated revenue). This reduction lowers operating costs, reduces exposure to water price volatility, and improves cash flows, while also enhancing resilience against drought and water stress risks identified in IPCC climate scenarios for Western Türkiye. The savings strengthen profit margins and free up capital for reinvestment in sustainability initiatives such as advanced monitoring systems, process efficiency improvements, and alternative sourcing solutions. Beyond financial benefits, the initiative reduces dependency on external freshwater, supports compliance with evolving water regulations, and demonstrates proactive stewardship highly valued by stakeholders and investors. By achieving this target, Batıçim not only captures measurable financial gains but also reinforces long-term competitiveness and resilience in both domestic and export markets.

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

Select from:

☒ Yes

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

36500000

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

44600000

(3.6.1.23) Explanation of financial effect figures

The estimated financial effect has been calculated based on the company's water efficiency target to reduce specific water consumption from 0.29 m³/ton to 0.25 m³/ton by 2030, corresponding to a 13% reduction in total annual water consumption. Total water consumption (Batiçim + Batisöke, 2024): 1,159,680 m³ Planned reduction (13%): $1,159,680 \times 0.13 = 150,758 \text{ m}^3$ Unit water tariff (İZSU, 2024): TRY 269.2 per m³ Annual savings: $150,758 \text{ m}^3 \times 269.2 \text{ TRY/m}^3 = \text{TRY } 40,584,161$ To reflect market uncertainties such as changes in water tariffs, operational variability, and implementation effectiveness, a sensitivity range of $\pm 10\%$ has been applied to the base figure of TRY 40.58 million: Minimum estimate (-10%): $\approx \text{TRY } 36.5$ million Maximum estimate ($+10\%$): $\approx \text{TRY } 44.6$ million Thus, the anticipated medium-term financial impact of improved water efficiency is expected to be in the range of TRY 36.5–44.6 million, with a central estimate of approximately TRY 40.6 million.

(3.6.1.24) Cost to realize opportunity

20000000

(3.6.1.25) Explanation of cost calculation

The cost of realizing this opportunity primarily involves investments in closed-loop cooling systems, digital water meters, stormwater harvesting, and wastewater reuse infrastructure. Based on ongoing and planned projects (e.g., Damla Damla Geleceği initiative), the total cost is estimated in the range of TRY 10–20 million.

(3.6.1.26) Strategy to realize opportunity

The core strategy to realize this opportunity is the commissioning of digital water meters valued at €70,000. This investment will enable more accurate measurement and monitoring of water consumption, allowing for early detection of potential leakages and inefficiencies, and facilitating rapid corrective action. Real-time data flow will enhance transparency in water use and support the effective tracking of targeted savings. Although the investment is limited in scale, the measurement and monitoring capacity provided by these meters will serve as a critical tool for Batiçim and Batisöke plants in achieving their water efficiency targets. As a result, operating costs will be reduced while financial and operational resilience will be strengthened against rising water tariffs and climate-induced water stress risks.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☒ Opp2

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Capital flow and financing

☒ Access to new financing options

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☒ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☒ Turkey

(3.6.1.8) Organization specific description

Green financing opportunities, including green bonds, sustainability-linked loans, and climate-focused funding instruments, provide Batıçim with access to lower-cost capital for projects that target emission reduction and environmental impact mitigation. By prioritizing investments aligned with sustainability criteria, the company strengthens eligibility for dedicated sustainability funds and ESG-driven capital flows. This creates access to diversified financing channels, reduces borrowing costs, and enhances the company's overall financial flexibility. From a strategic perspective, leveraging green financing not only provides cost advantages but also improves investor appeal and credibility, particularly in export markets where climate alignment is increasingly scrutinized. These instruments support the scaling of low-carbon technologies, resource-efficiency measures, and water conservation projects, ensuring long-term competitiveness under Türkiye's forthcoming ETS and the EU CBAM framework.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☒ Increased access to capital

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

Select all that apply

☒ Long-term

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

Select from:

☒ Very likely (90–100%)

(3.6.1.12) Magnitude

Select from:

☒ High

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

By utilizing green financing mechanisms, the company can significantly reduce its cost of capital through access to long-term loans and bonds with below-market interest rates. This reduction in financing costs enhances liquidity, optimizes capital structure, and allows for more effective execution of strategic investment plans. Over the medium to long term, this improves profitability, stabilizes cash flows by lowering interest payment obligations, and reduces exposure to interest rate volatility. Additionally, aligning financing with sustainability objectives strengthens investor confidence, potentially increasing access to diverse funding sources and improving the company's overall financial resilience.

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

Select from:

☒ Yes

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

72463577

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

65300000

(3.6.1.23) Explanation of financial effect figures

The calculation is based on the total revenue reported in the TSRS 2024 report (TRY 13,440,205,000) and the disclosed potential impact ratio of 0.54%. This ratio reflects the assumption that access to lower-cost capital through the use of green finance instruments will directly translate into annual financial savings. $13,440,205,000 \times 0.0054 = 72463577 \text{ TRY}$ Accordingly, the estimated medium-term financial effect is approximately TRY 72,4 million. These savings will materialize

through reduced interest payments, improved cash flow, and increased investment capacity. To account for uncertainties (such as fluctuations in market interest rates, accessibility of green finance instruments, and implementation timelines), a $\pm 10\%$ sensitivity range has been applied

(3.6.1.24) Cost to realize opportunity

8000000

(3.6.1.25) Explanation of cost calculation

The realization cost primarily consists of reporting, verification, and certification processes required for green finance eligibility. The estimated cost is in the range of TRY3-5 million, covering sustainable finance structuring and independent verification services. Green bond/loan certification expenses (~TRY 2-3 million) Independent sustainability reporting and verification (~TRY 2–3 million) Internal capacity building and training programs (~TRY 500 thousand–1 million)

(3.6.1.26) Strategy to realize opportunity

Bati Anadolu Group's approach to leveraging green finance focuses on: Accessing lower-cost capital through the issuance of green bonds and sustainability-linked loans. Diversifying funding channels by engaging with national and international green finance mechanisms (e.g., ESG-linked loans, EU taxonomy-aligned credits). Strengthening MRV (Monitoring, Reporting, Verification) systems to build investor confidence and ensure transparency. Allocating realized financial savings directly into low-carbon production technologies and efficiency projects. Through these measures, the Group will reduce its cost of capital, leading to lower financing expenses, improved profitability, and stronger cash flow. Enhanced financial flexibility will enable accelerated investment in low-carbon transition initiatives, reinforcing long-term competitiveness and ensuring greater financial resilience in a regulated carbon market.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☒ Opp3

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Products and services

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

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☒ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☒ Turkey

(3.6.1.8) Organization specific description

Batiçim is actively investing in R&D and innovation to expand its low-carbon product portfolio and accelerate the development of sustainable construction materials. Efforts focus on producing low-clinker cement, alternative binders, and innovative concrete products with reduced embodied carbon. Pilot projects explore carbon capture and utilization (CCU) technologies and the integration of industrial by-products into production. These initiatives not only reduce CO₂ emissions but also align with regulatory requirements under Türkiye's ETS and the EU CBAM, ensuring market access and competitiveness.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☒ Reduced direct costs

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

Select all that apply

☒ Medium-term

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

Select from:

☒ Likely (66–100%)

(3.6.1.12) Magnitude

Select from:

☒ High

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

Anticipated effect of the opportunity on the financial position, financial performance and cash flows The adoption of alternative fuels is expected to yield direct savings on fuel procurement and operational costs, enhancing profit margins and improving overall financial performance. These savings will contribute to a stronger cash flow position, enabling the organization to reinvest in low-carbon technologies and energy efficiency measures. Reduced dependency on fossil fuels will also mitigate exposure to fuel price volatility and potential carbon cost increases under ETS and CBAM regulations. Over the medium term, these benefits will improve financial resilience, strengthen the balance sheet, and support sustainable growth strategies.

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

Select from:

☒ Yes

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

42902499

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

149659882

(3.6.1.23) Explanation of financial effect figures

The anticipated financial effect figures are derived from the potential financial impact ratio of alternative fuel use relative to total company revenue, as disclosed in the TSRS 2024 report. Based on consolidated revenue of TRY 13.44 billion, the 0.32% potential impact equates to approximately TRY 42.9 million. This projection reflects expected cost savings from reduced fossil fuel consumption and lower operational expenses, alongside efficiency gains from the use of waste-derived fuels. These savings are expected to positively influence cash flow, strengthen profitability, and enhance the company's financial flexibility over the medium term. In 2024, the company achieved 8.6% alternative fuel usage, generating measurable savings in fuel costs. The resulting efficiency gains demonstrate the financial viability of substituting fossil fuels with waste-derived energy sources. Looking ahead, the company has modeled scenarios based on further expansion of alternative fuel adoption. Under a 30% increase in alternative fuel usage, the maximum financial impact is estimated at TRY 149.7 million, illustrating the scale of potential long-term benefits.

(3.6.1.24) Cost to realize opportunity

42902499

(3.6.1.25) Explanation of cost calculation

The cost to realize this opportunity has been estimated based on the potential financial impact ratio disclosed in the TSRS 2024 report. Applying the reported revenue figure, a 0.32% impact corresponds to approximately TRY 42.9 million. This estimate reflects expected savings from fuel and operational cost reductions achieved through the substitution of fossil fuels with alternative fuels. These savings are anticipated to improve cash flow and increase profitability in the medium term.

(3.6.1.26) Strategy to realize opportunity

The company will prioritize the procurement of alternative fuels, such as Refuse-Derived Fuels (RDF), within its energy management and purchasing strategies. This approach involves restructuring supplier relationships to ensure consistent and high-quality supply while maintaining compliance with environmental regulations. To optimize the use of alternative fuels, targeted investments will be made in storage, handling, and feeding systems. In parallel, operational efficiency projects and employee training programs will be implemented to maximize cost savings and performance improvements. These measures will not only reduce dependency on fossil fuels but also align with the company's long-term low-carbon production objectives. By integrating alternative fuel strategies into its core operations, the company enhances competitiveness and resilience against future carbon regulations, while securing financial benefits that support sustainable growth.

[Add row]

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

Climate change

(3.6.2.1) Financial metric

Select from:

☒ Revenue

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

72463577

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

Select from:

☒ Less than 1%

(3.6.2.4) Explanation of financial figures

The estimated financial impact has been calculated based on the total consolidated revenue disclosed in the TSRS 2024 report (TRY 13,440,205,000) and the identified potential effect ratio of 0.54%. Applying this ratio results in an estimated financial impact of approximately TRY 72,463,577. This figure reflects the cost advantage gained from accessing capital at lower interest rates through green finance instruments compared to conventional credit facilities, with savings expected to manifest through reduced financing costs, improved cash flow, and reduced financial risks. To account for market uncertainties such as fluctuations in interest rates, the accessibility of green financing tools, and the pace of implementation, a sensitivity range of $\pm 10\%$ was applied, resulting in a minimum estimate of TRY 65.2 million and a maximum estimate of TRY 79.7 million. The cost to realize this opportunity is mainly related to certification, reporting, and verification processes required for green finance eligibility, estimated at TRY 8–12 million. This includes green bond or loan certification expenses, independent sustainability reporting and verification, as well as internal capacity building and training programs. These investments are necessary to ensure compliance with sustainable finance principles and to strengthen transparency for investors. The company's strategy to realize this opportunity focuses on leveraging green bonds and sustainability-linked loans to access lower-cost capital, diversifying financing options through national and international mechanisms such as ESG-linked loans and EU taxonomy-aligned credit lines, and strengthening monitoring, reporting, and verification (MRV) systems to enhance investor confidence. The financial savings achieved through these measures will be reinvested into low-carbon technologies and operational efficiency projects, directly supporting the company's decarbonization pathway. Overall, the use of green finance instruments will reduce financing costs, lower interest expenses, and improve cash flow, thereby enhancing profitability and financial flexibility. This improved financial resilience will enable the Batı Anadolu Group to accelerate investments in sustainable growth, strengthen competitiveness in both domestic and export markets, and reinforce long-term financial stability under evolving carbon pricing and regulatory frameworks.

Water

(3.6.2.1) Financial metric

Select from:

☒ Revenue

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

40584161

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

Select from:

☒ Less than 1%

(3.6.2.4) Explanation of financial figures

Our water efficiency initiatives reduce Batı Anadolu Group's operational costs, strengthen competitive advantage, and enable more efficient capital allocation. Recognizing the critical role of water in cement production, we have implemented closed-loop cooling systems, rainwater harvesting, and advanced metering/monitoring technologies to optimize consumption. Based on consolidated 2024 consumption data, a 5 % reduction scenario corresponds to an annual saving of approximately TRY 15609292. These savings reduce dependency on external water supply, safeguard operational continuity, improve cash flow, and enhance financial flexibility. The financial benefits also facilitate reinvestment into sustainability-focused projects and support the company's long-term growth objectives. Furthermore, these initiatives strengthen compliance with national regulations and international investor expectations, increasing resilience against climate-related risks

[Add row]

C4. Governance

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

(4.1.1) Board of directors or equivalent governing body

Select from:

☒ Yes

(4.1.2) Frequency with which the board or equivalent meets

Select from:

☒ More frequently than quarterly

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

Select all that apply

☒ Executive directors or equivalent

☒ Non-executive directors or equivalent

(4.1.4) Board diversity and inclusion policy

Select from:

☒ Yes, and it is publicly available

(4.1.5) Briefly describe what the policy covers

Bati Anadolu Group of Companies is committed to embedding diversity, equity, and inclusion (DEI) into every aspect of its operations. The Policy establishes a fair, safe, and respectful environment for employees, candidates, suppliers, contractors, and business partners, ensuring that no individual faces discrimination based on gender, age, race, religion, language, nationality, ethnicity, disability, sexual orientation, gender identity, political view, or socioeconomic background. Diversity is recognized as a source of enrichment, creativity, and innovation, and inclusion is promoted as a core value that enables all individuals to reach their full potential. The Policy, which became effective on October 10, 2024 and is publicly available, is aligned with international human rights frameworks, including the UN Global Compact, the Universal Declaration of Human Rights, the Women's Empowerment Principles, and the ILO Declaration on Fundamental Principles and Rights at

Work. It enforces a zero-tolerance principle against discrimination, harassment, or inequality, and requires regular monitoring and improvement to align with sustainability and ethical business practices. Key commitments include gender equality in recruitment, compensation, promotion, and leadership; equal access to training and career development; fostering diverse perspectives in decision-making; and maintaining inclusive communication.

(4.1.6) Attach the policy (optional)

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[Fixed row]

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

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

[Fixed row]

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

Climate change

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

Select all that apply

- ☒ Board-level committee
- ☒ Other, please specify :Board Member, Group Head - Operations, Group Head - Finance and Accounting, Group Head - Marketing and Concrete

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

Select from:

- ☒ Yes

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

Select all that apply

- ☒ Board mandate
- ☒ Individual role descriptions
- ☒ Other policy applicable to the board, please specify :As a publicly listed company in Türkiye, board-level accountability on sustainability and environmental issues is disclosed both in the mandatory Annual Activity Report and in the IFRS-based Sustainability Report.

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

Select from:

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

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

Select all that apply

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

(4.1.2.7) Please explain

Board Level Committee is the highest governance body directly accountable for sustainability and climate-related issues at Batı Anadolu Group. The Board has the mandate to oversee the integration of climate-related considerations into corporate strategy, ensure alignment with long-term business objectives, and approve policies and initiatives that address both transition and physical climate risks. Its responsibilities include setting strategic direction, reviewing climate-related risks and opportunities, approving targets, and monitoring progress against sustainability commitments. By embedding climate considerations into strategic planning, the Board ensures that the company's growth pathway remains compatible with decarbonization, resilience, and stakeholder expectations. The Board is supported by the Sustainability Committee, which acts as the primary oversight body for sustainability governance. This Committee monitors the implementation of the company's sustainability and climate strategy, evaluates climate-related risks and opportunities, and ensures compliance with regulatory frameworks such as the EU Emissions Trading System (ETS), the Carbon Border Adjustment Mechanism (CBAM), and national climate regulations in Türkiye. It regularly reviews reports on carbon emissions, energy efficiency, renewable energy deployment, and adaptation measures, and makes recommendations to the Board on areas requiring improvement. The Committee also assesses climate-related opportunities such as low-carbon product innovation, green financing, and stakeholder partnerships. The Committee is chaired by a Board Member, who ensures that climate and sustainability objectives remain aligned with corporate vision. The Board Member leads Board-level discussions on climate ambition, reviews decarbonization pathways, and oversees the evaluation of key performance indicators (KPIs) related to energy transition, circular economy initiatives, and resilience against physical climate impacts. Together with other Board Members, this role is accountable for reviewing and approving the sustainability roadmap, including the company's net-zero commitment, carbon reduction strategies, and stakeholder engagement practices. Within this governance structure, the Sustainability Committee, operating under Board oversight, is tasked with operationalizing the climate strategy. It coordinates major projects such as renewable energy investments, waste heat recovery, energy efficiency programs, and alternative fuel use. The Committee tracks progress against defined climate KPIs, ensures cross-functional participation, and facilitates collaboration across departments to embed climate considerations in day-to-day operations. Reports generated by the Sustainability Committee are submitted to both the Board and the Corporate Governance Committee, enabling informed decision-making and accountability.

Water

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

Select all that apply

- ☒ Board-level committee
- ☒ Other, please specify :Board Member, Group Head - Operations, Group Head - Finance and Accounting, Group Head - Marketing and Concrete

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

Select from:

- ☒ Yes

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

Select all that apply

- ☒ Board mandate
- ☒ Individual role descriptions
- ☒ Other policy applicable to the board, please specify :IFRS Sustainability Report

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

Select from:

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

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

Select all that apply

- | | |
|--|--|
| <input checked="" type="checkbox"/> Overseeing and guiding scenario analysis | <input checked="" type="checkbox"/> Overseeing and guiding public policy engagement |
| <input checked="" type="checkbox"/> Overseeing the setting of corporate targets | <input checked="" type="checkbox"/> Reviewing and guiding innovation/R&D priorities |
| <input checked="" type="checkbox"/> Monitoring progress towards corporate targets | <input checked="" type="checkbox"/> Monitoring the implementation of the business strategy |
| <input checked="" type="checkbox"/> Overseeing and guiding value chain engagement | <input checked="" type="checkbox"/> Overseeing reporting, audit, and verification processes |
| <input checked="" type="checkbox"/> Approving corporate policies and/or commitments | <input checked="" type="checkbox"/> Monitoring compliance with corporate policies and/or commitments |
| <input checked="" type="checkbox"/> Overseeing and guiding the development of a climate transition plan | |
| <input checked="" type="checkbox"/> Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities | |

(4.1.2.7) Please explain

Board Level Committee is the highest governance body directly accountable for sustainability and water-related issues at Batı Anadolu Group. The Board has the mandate to oversee the integration of climate-related considerations into corporate strategy, ensure alignment with long-term business objectives, and approve policies and initiatives that address water risks. Its responsibilities include setting strategic direction, reviewing water risks and opportunities, approving targets, and monitoring progress against sustainability commitments. By embedding water considerations into strategic planning, the Board ensures that the company's growth pathway remains compatible with decarbonization, resilience, and stakeholder expectations. The Board is supported by the Sustainability Committee, which acts as the primary oversight body for sustainability governance. This Committee monitors the implementation of the company's sustainability and climate strategy, evaluates water-related risks and opportunities, and ensures compliance with regulatory frameworks such as WATER EFFICIENCY REGULATIONS in Türkiye. It regularly reviews reports on water scarcity, water consumption, and adaptation measures, and makes recommendations to the Board on areas requiring improvement. The Committee also assesses water-related opportunities such as digital meter system, and stakeholder partnerships. The Committee is chaired by a Board Member, who ensures that water and sustainability objectives remain aligned with corporate vision. The Board Member leads Board-level discussions on water target, reviews oversees the evaluation of key performance indicators (KPIs) related to water consumption. Together with other Board Members, this role is accountable for reviewing and approving the sustainability roadmap, including the company's ESG commitments and stakeholder engagement practices. Within this governance

structure, the Sustainability Committee, operating under Board oversight, is tasked with operationalizing the water strategy. The Committee tracks progress against defined ESG KPIs, ensures cross-functional participation, and facilitates collaboration across departments to embed climate considerations in day-to-day operations. Reports generated by the Sustainability Committee are submitted to both the Board and the Corporate Governance Committee, enabling informed decision-making and accountability.

Biodiversity

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

Select all that apply

- ☒ Board-level committee
- ☒ Other, please specify :Board Member, Group Head - Operations, Group Head - Finance and Accounting, Group Head - Marketing and Concrete,

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

Select from:

- ☒ Yes

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

Select all that apply

- ☒ Board mandate
- ☒ Individual role descriptions
- ☒ Other policy applicable to the board, please specify :GRI Sustainability Report and IFRS Sustainability Report

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

Select from:

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

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

Select all that apply

- ☒ Overseeing and guiding scenario analysis
- ☒ Overseeing the setting of corporate targets

- ☒ Approving corporate policies and/or commitments
- ☒ Overseeing and guiding public policy engagement
- ☒ Overseeing reporting, audit, and verification processes
- ☒ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

(4.1.2.7) Please explain

Biodiversity governance at Batı Anadolu Group is directly overseen by the Board of Directors, which serves as the highest authority for sustainability, natural capital, and ecosystem management. The Board ensures that biodiversity protection and ecosystem stewardship are embedded into long-term strategy, and that ESG practices address risks and opportunities related to natural capital. Board-level duties include approving policies, monitoring biodiversity KPIs, and ensuring that conservation and restoration activities are fully aligned with business objectives. By integrating biodiversity into strategic decision-making, the Board guarantees that growth is consistent with ecological resilience and stakeholder expectations. The Board is supported by the Sustainability Committee, which provides primary oversight for biodiversity governance. This Committee monitors implementation of biodiversity strategies, evaluates risks and opportunities such as ecosystem impacts, land-use regulations, and EU environmental frameworks, and reports directly to the Board. It reviews biodiversity-related indicators, identifies areas for improvement, and recommends actions to enhance ecosystem stewardship. Operating under Board oversight, the Sustainability Committee is also responsible for translating biodiversity strategy into operations. It coordinates initiatives such as quarry rehabilitation, reduction of ecological footprints, and sustainable use of resources. It ensures integration of circular economy practices, use of alternative raw materials, and industrial symbiosis projects that reduce dependency on virgin inputs and mitigate biodiversity loss. Performance data disclosed in the TSRS-aligned Sustainability Report illustrate the outcomes of these mechanisms. In 2024, Batı Anadolu achieved a 99.63% recovery rate of operational waste, contributing to reduced pressures on ecosystems. The Group also reported a 12% reduction in concrete sludge and a 23.5% reuse rate of recycled water in ready-mix operations, supporting ecosystem protection and water conservation. These metrics show how operational practices connect directly to biodiversity governance. At the executive level, the Board Member leading the Sustainability Committee, together with the CEO and Sustainability Manager, ensures that biodiversity considerations are embedded in daily operations. They oversee quarry rehabilitation, the use of alternative materials, and partnerships with regulators, local authorities, academia, and civil society to minimize ecological impacts and support ecosystem resilience.

[Fixed row]

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

Climate change

(4.2.1) Board-level competency on this environmental issue

Select from:

- ☒ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

- ☒ Consulting regularly with an internal, permanent, subject-expert working group
- ☒ Engaging regularly with external stakeholders and experts on environmental issues
- ☒ Integrating knowledge of environmental issues into board nominating process
- ☒ Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)

Water

(4.2.1) Board-level competency on this environmental issue

Select from:

- ☒ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

- ☒ Consulting regularly with an internal, permanent, subject-expert working group
- ☒ Engaging regularly with external stakeholders and experts on environmental issues
- ☒ Integrating knowledge of environmental issues into board nominating process
- ☒ Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)

[Fixed row]

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

	Management-level responsibility for this environmental issue
Climate change	<i>Select from:</i> <input checked="" type="checkbox"/> Yes

	Management-level responsibility for this environmental issue
Water	Select from: <input checked="" type="checkbox"/> Yes
Biodiversity	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

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

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Committee

☒ Sustainability committee

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☒ Assessing environmental dependencies, impacts, risks, and opportunities

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

☒ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

☒ Managing engagement in landscapes and/or jurisdictions

☒ Managing public policy engagement related to environmental issues

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

Policies, commitments, and targets

- ☒ Measuring progress towards environmental corporate targets
- ☒ Measuring progress towards environmental science-based targets
- ☒ Setting corporate environmental policies and/or commitments
- ☒ Setting corporate environmental targets

Strategy and financial planning

- ☒ Developing a climate transition plan
- ☒ Implementing a climate transition plan
- ☒ Conducting environmental scenario analysis
- ☒ Implementing the business strategy related to environmental issues
- ☒ Managing acquisitions, mergers, and divestitures related to environmental issues
- ☒ Managing major capital and/or operational expenditures relating to environmental issues
- ☒ Managing priorities related to innovation/low-environmental impact products or services (including R&D)

Other

- ☒ Providing employee incentives related to environmental performance

(4.3.1.4) Reporting line

Select from:

- ☒ Reports to the board directly

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

Select from:

- ☒ More frequently than quarterly

(4.3.1.6) Please explain

The Sustainability Committee is the main governance body responsible for managing climate-related issues across Batı Anadolu Group. Established under the authority of the Board of Directors, the Committee ensures that climate-related priorities are systematically integrated into business strategy and operations. It directly reports to the Board, providing updates more frequently than quarterly, ensuring that climate risks, opportunities, and performance are regularly monitored at the highest governance level. The Committee's responsibilities include identifying and assessing climate-related dependencies, impacts, risks, and opportunities. This covers both physical risks (such as heatwaves, drought, and extreme weather events) and transition risks (including regulatory frameworks like the EU Emissions Trading System (ETS) and the Carbon Border Adjustment Mechanism (CBAM)). The Committee evaluates potential impacts on operations, costs, and market competitiveness, and provides recommendations for mitigation and adaptation. It also coordinates the implementation of decarbonization initiatives, including energy efficiency programs, renewable energy use, waste heat recovery projects, and the substitution of fossil fuels with alternative fuels. These projects are aligned with the Group's 2053 low-carbon transition roadmap, which sets clear objectives for emissions reduction and compliance with Türkiye's climate commitments. The Sustainability Committee engages directly with suppliers, contractors, and stakeholders to ensure compliance with environmental requirements across the value chain. It also monitors international and national policy developments to keep the Group aligned with evolving regulations. Performance indicators on emissions, energy use, and climate targets are reviewed regularly, and reports are escalated to the Board for oversight and decision-making. Through this governance Batı Anadolu ensures that climate change is addressed as a strategic priority.

Water

(4.3.1.1) Position of individual or committee with responsibility

Committee

- ☒ Sustainability committee

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

- ☒ Assessing environmental dependencies, impacts, risks, and opportunities
- ☒ Assessing future trends in environmental dependencies, impacts, risks, and opportunities
- ☒ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

- ☒ Managing engagement in landscapes and/or jurisdictions
- ☒ Managing public policy engagement related to environmental issues

Policies, commitments, and targets

- ☒ Measuring progress towards environmental corporate targets
- ☒ Measuring progress towards environmental science-based targets

- ☒ Setting corporate environmental policies and/or commitments

Strategy and financial planning

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

Other

- ☒ Providing employee incentives related to environmental performance

(4.3.1.4) Reporting line

Select from:

- ☒ Reports to the board directly

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

Select from:

- ☒ More frequently than quarterly

(4.3.1.6) Please explain

The Sustainability Committee, established under the authority of the Board of Directors, is responsible for overseeing water management at Batı Anadolu Group. It directly reports to the Board more frequently than quarterly, ensuring that water-related risks, dependencies, and opportunities are addressed as part of the Group's sustainability governance. The Committee monitors water consumption and efficiency across cement and concrete operations, ensuring compliance with national regulations and alignment with sustainability commitments. It reviews performance indicators such as the reuse of recycled process water, wastewater reduction, and closed-loop water systems, and provides recommendations for continuous improvement. In 2024, the Group achieved a 23.5% recycled water reuse rate in ready-mix concrete operations, alongside a 12% reduction in concrete sludge, while maintaining a 99.63% recovery rate of operational waste, all of which directly contribute to natural resource conservation and responsible water stewardship. The Committee also oversees water-related projects including wastewater treatment, rainwater harvesting, and the adoption of technologies that reduce freshwater withdrawal. It ensures coordination across functions such as production, environmental management, and R&D, enabling integration of water considerations into daily operations. At the executive level, the CEO and the Sustainability Manager are accountable for implementing water efficiency initiatives and engaging with environmental authorities, local stakeholders, and regulators to ensure compliance and

minimize risks related to water scarcity and quality. Through this governance system, Batı Anadolu secures accountability for water management at the highest level. Oversight by the Committee and reporting to the Board guarantee that water stewardship remains a strategic priority, with systematic monitoring, transparent disclosure, and continuous performance improvement.

Biodiversity

(4.3.1.1) Position of individual or committee with responsibility

Committee

- ☒ Sustainability committee

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

- ☒ Assessing environmental dependencies, impacts, risks, and opportunities
- ☒ Assessing future trends in environmental dependencies, impacts, risks, and opportunities
- ☒ Managing environmental dependencies, impacts, risks, and opportunities

Policies, commitments, and targets

- ☒ Monitoring compliance with corporate environmental policies and/or commitments
- ☒ Setting corporate environmental policies and/or commitments
- ☒ Setting corporate environmental targets

Strategy and financial planning

- ☒ Managing annual budgets related to environmental issues
- ☒ Managing major capital and/or operational expenditures relating to environmental issues
- ☒ Managing priorities related to innovation/low-environmental impact products or services (including R&D)

Other

- ☒ Providing employee incentives related to environmental performance

(4.3.1.4) Reporting line

Select from:

☒ Reports to the board directly

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

Select from:

☒ More frequently than quarterly

(4.3.1.6) Please explain

At Batı Anadolu Group, biodiversity governance is embedded within the company's highest-level decision-making structures, ensuring that natural capital and ecosystem-related issues are managed as strategic priorities. Oversight is provided directly by the Board of Directors, which integrates biodiversity protection and ecosystem stewardship into the Group's strategic objectives. The Board approves relevant policies, monitors progress, and ensures that biodiversity-related performance indicators are aligned with long-term business resilience and sustainability goals. The Corporate Governance Committee supports the Board in monitoring biodiversity strategies, reviewing dependencies and impacts on local ecosystems, and evaluating potential risks arising from land use, raw material sourcing, and regulatory frameworks. The Committee also guides the Sustainability Committee, which operationalizes biodiversity initiatives and ensures cross-functional collaboration. Regular updates on biodiversity KPIs and project outcomes are reported back to the Board, enabling transparent oversight and continuous improvement. The Sustainability Committee translates strategic commitments into action. Its remit includes coordinating quarry rehabilitation programs, alternative raw material use, circular economy practices, and industrial symbiosis projects that reduce pressure on ecosystems and support biodiversity protection. Monitoring frameworks track the effectiveness of these initiatives, and measurable outcomes are reported in the TSRS-aligned sustainability disclosures, such as a 99.63% operational waste recovery rate, a 12% reduction in concrete sludge, and a 23.5% reuse rate of recycled water in ready-mix operations. At the executive level, the CEO and the Sustainability Manager ensure that biodiversity considerations are embedded into operational planning and procurement.

[Add row]

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

Climate change

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

Select from:

☒ Yes

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

(4.5.3) Please explain

As disclosed in Batı Anadolu Group's TSRS/IFRS-aligned Sustainability Report, executive remuneration is directly linked to sustainability and climate-related objectives through the OKR (Objectives and Key Results) system. Since 2024, 16% of corporate objectives have been tied to sustainability goals, which are integrated into performance evaluation and remuneration mechanisms. These objectives cover climate-related indicators such as timely and accurate climate reporting, carbon footprint reduction, energy efficiency, clinker optimization, promotion of circular economy practices, and sustainable resource use. By linking these objectives to the remuneration system, the Group ensures that climate-related targets are systematically embedded in decision-making and that executive performance contributes to long-term decarbonization and resilience. From 2025 onwards, climate-specific KPIs, including carbon reduction targets, will be explicitly incorporated into remuneration policies

Water

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

Select from:

☒ Yes

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

16

(4.5.3) Please explain

Batı Anadolu Group integrates water management objectives into its sustainability governance and remuneration system. Within the OKR (Objectives and Key Results) framework, a share of corporate performance goals linked to sustainability (16% as of 2024) includes indicators directly relevant to water stewardship. These performance criteria address water efficiency, operational sustainability, wastewater reduction, and closed-loop water management practices, which are reviewed in year-end evaluations and influence executive remuneration. In 2024, the Group achieved a 23.5% recycled water reuse rate in ready-mix concrete operations and a 12% reduction in concrete sludge, while maintaining a 99.63% recovery rate of operational waste, demonstrating progress in natural capital and water efficiency. At the company level, water intensity targets are clearly defined: Batıçim reduced its specific water use to 0.292 m³/ton cement equivalent in 2024, with targets to reach 0.28 by 2030

[Fixed row]

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

Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☒ Other C-Suite Officer, please specify :Group Head - Operations

(4.5.1.2) Incentives

Select all that apply

☒ Bonus – set figure

(4.5.1.3) Performance metrics

Targets

☒ Achievement of environmental targets

☒ Other targets-related metrics, please specify :carbon footprint reduction, energy efficiency programs, clinker optimization, circular economy initiatives, compliance with ETS/CBAM, resource efficiency

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

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

(4.5.1.5) Further details of incentives

At Batı Anadolu Group, executive remuneration is directly linked to sustainability and environmental performance through the OKR (Objectives and Key Results) system. Since 2024, 16% of corporate objectives have been tied to sustainability goals, which are integrated into the annual performance evaluation and remuneration framework. These objectives include timely climate reporting, carbon footprint reduction, energy efficiency, clinker optimization, circular economy practices, waste management, and resource efficiency. Performance is evaluated annually, and achievements against these sustainability targets are factored into determining executive bonuses. This ensures that managers are incentivized not only based on financial results but also on environmental outcomes. From 2025 onwards, the remuneration system explicitly incorporates climate-specific KPIs. These include: Doubling the share of alternative fuels compared to 2023, supported by financial, operational, and investment initiatives. Increasing blended cement sales, with a target for domestic bulk sales to exceed 77% blended cement share,

alongside expanded exports of blended products. Reducing Scope 1–2 GHG emissions, with 2025 targets of 730 kgCO₂e/ton cement for Batıçim and 740 kgCO₂e/ton cement for Batisöke. By embedding such measurable KPIs into the remuneration system, Batı Anadolu strengthens accountability and ensures that executives and managers contribute directly to the Group's long-term decarbonization and sustainability strategy.

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

At Batı Anadolu Group, incentives are designed to ensure that environmental and climate commitments are systematically embedded into executive decision-making. Since 2024, 16% of corporate objectives have been linked to sustainability goals through the OKR system, and these objectives are directly integrated into annual performance evaluations and remuneration. This mechanism aligns the financial interests of executives with the Group's sustainability strategy and climate transition roadmap. The performance criteria include timely climate reporting, carbon footprint reduction, energy efficiency, clinker optimization, circular economy practices, resource efficiency, and compliance with environmental regulations. Achievements in these areas are reflected in remuneration outcomes, providing a clear incentive for executives to deliver on decarbonization, water stewardship, and resource efficiency targets. From 2025 onwards, the remuneration system will explicitly include climate-specific KPIs such as carbon reduction and risk management indicators, ensuring even stronger alignment between executive incentives and the Group's climate transition plan. This linkage drives accountability, motivates progress toward the 2053 net-zero commitment, and secures continuous improvement in environmental performance.

Water

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☒ Other C-Suite Officer, please specify :Group Head - Operations

(4.5.1.2) Incentives

Select all that apply

☒ Bonus – set figure

(4.5.1.3) Performance metrics

Targets

☒ Achievement of environmental targets

☒ Other targets-related metrics, please specify :carbon footprint reduction, energy efficiency programs, clinker optimization, circular economy initiatives, compliance with ETS/CBAM, resource efficiency

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

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

(4.5.1.5) Further details of incentives

At Batı Anadolu Group, executive remuneration is directly linked to sustainability and environmental performance through the OKR (Objectives and Key Results) system. Since 2024, 16% of corporate objectives have been tied to sustainability goals, which are integrated into the annual performance evaluation and remuneration framework. These objectives include timely climate reporting, carbon footprint reduction, energy efficiency, clinker optimization, circular economy practices, waste management, and resource efficiency. Performance is evaluated annually, and achievements against these sustainability targets are factored into determining executive bonuses. This ensures that managers are incentivized not only based on financial results but also on environmental outcomes. From 2025 onwards, the remuneration system explicitly incorporates climate-specific KPIs. These include: Doubling the share of alternative fuels compared to 2023, supported by financial, operational, and investment initiatives. Increasing blended cement sales, with a target for domestic bulk sales to exceed 77% blended cement share, alongside expanded exports of blended products. Reducing Scope 1–2 GHG emissions, with 2025 targets of 730 kgCO₂e/ton cement for Batıçim and 740 kgCO₂e/ton cement for Batisöke. By embedding such measurable KPIs into the remuneration system, Batı Anadolu strengthens accountability and ensures that executives and managers contribute directly to the Group's long-term decarbonization and sustainability strategy..

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

At Batı Anadolu Group, incentives are designed to ensure that environmental and climate commitments are systematically embedded into executive decision-making. Since 2024, 16% of corporate objectives have been linked to sustainability goals through the OKR system, and these objectives are directly integrated into annual performance evaluations and remuneration. This mechanism aligns the financial interests of executives with the Group's sustainability strategy and climate transition roadmap. The performance criteria include timely climate reporting, carbon footprint reduction, energy efficiency, clinker optimization, circular economy practices, resource efficiency, and compliance with environmental regulations. Achievements in these areas are reflected in remuneration outcomes, providing a clear incentive for executives to deliver on decarbonization, water stewardship, and resource efficiency targets. From 2025 onwards, the remuneration system will explicitly include climate-specific KPIs such as carbon reduction and risk management indicators, ensuring even stronger alignment between executive incentives and the Group's climate transition plan. This linkage drives accountability, motivates progress toward the 2053 net-zero commitment, and secures continuous improvement in environmental performance.

Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☒ Other C-Suite Officer, please specify :Group Head-Finance and Accounting

(4.5.1.2) Incentives

Select all that apply

☒ Bonus – set figure

(4.5.1.3) Performance metrics

Targets

☒ Achievement of environmental targets

☒ Other targets-related metrics, please specify :carbon footprint reduction, energy efficiency programs, clinker optimization, circular economy initiatives, compliance with ETS/CBAM, resource efficiency

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

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

(4.5.1.5) Further details of incentives

At Batı Anadolu Group, executive remuneration is directly linked to sustainability and environmental performance through the OKR (Objectives and Key Results) system. Since 2024, 16% of corporate objectives have been tied to sustainability goals, which are integrated into the annual performance evaluation and remuneration framework. These objectives include timely climate reporting, carbon footprint reduction, energy efficiency, clinker optimization, circular economy practices, waste management, and resource efficiency. Performance is evaluated annually, and achievements against these sustainability targets are factored into determining executive bonuses. This ensures that managers are incentivized not only based on financial results but also on environmental outcomes. From 2025 onwards, the remuneration system explicitly incorporates climate-specific KPIs. These include: Doubling the share of alternative fuels compared to 2023, supported by financial, operational, and investment initiatives. Increasing blended cement sales, with a target for domestic bulk sales to exceed 77% blended cement share, alongside expanded exports of blended products. Reducing Scope 1–2 GHG emissions, with 2025 targets of 730 kgCO₂e/ton cement for Batıçim and 740 kgCO₂e/ton cement for Batisöke. By embedding such measurable KPIs into the remuneration system, Batı Anadolu strengthens accountability and ensures that executives and managers contribute directly to the Group's long-term decarbonization and sustainability strategy..

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

At Batı Anadolu Group, incentives are designed to ensure that environmental and climate commitments are systematically embedded into executive decision-making. Since 2024, 16% of corporate objectives have been linked to sustainability goals through the OKR system, and these objectives are directly integrated into annual performance evaluations and remuneration. This mechanism aligns the financial interests of executives with the Group's sustainability strategy and climate transition roadmap. The performance criteria include timely climate reporting, carbon footprint reduction, energy efficiency, clinker optimization, circular economy practices, resource efficiency, and compliance with environmental regulations. Achievements in these areas are reflected in remuneration outcomes, providing a clear incentive for executives to deliver on decarbonization, water stewardship, and resource efficiency targets. From 2025 onwards, the remuneration system will explicitly include climate-specific KPIs such as carbon reduction and risk management indicators, ensuring even stronger alignment between executive incentives and the Group's climate transition plan. This linkage drives accountability, motivates progress toward the 2053 net-zero commitment, and secures continuous improvement in environmental performance.

Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☒ Other C-Suite Officer, please specify :Group Head - Marketing and Concrete

(4.5.1.2) Incentives

Select all that apply

☒ Bonus – set figure

(4.5.1.3) Performance metrics

Targets

☒ Achievement of environmental targets

☒ Other targets-related metrics, please specify :carbon footprint reduction, energy efficiency programs, clinker optimization, circular economy initiatives, compliance with ETS/CBAM, resource efficiency

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

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

(4.5.1.5) Further details of incentives

At Batı Anadolu Group, executive remuneration is directly linked to sustainability and environmental performance through the OKR (Objectives and Key Results) system. Since 2024, 16% of corporate objectives have been tied to sustainability goals, which are integrated into the annual performance evaluation and remuneration framework. These objectives include timely climate reporting, carbon footprint reduction, energy efficiency, clinker optimization, circular economy practices, waste management, and resource efficiency. Performance is evaluated annually, and achievements against these sustainability targets are factored into determining executive bonuses. This ensures that managers are incentivized not only based on financial results but also on environmental outcomes. From 2025 onwards, the remuneration system explicitly incorporates climate-specific KPIs. These include: Doubling the share of alternative fuels compared to 2023, supported by financial, operational, and investment initiatives. Increasing blended cement sales, with a target for domestic bulk sales to exceed 77% blended cement share, alongside expanded exports of blended products. Reducing Scope 1–2 GHG emissions, with 2025 targets of 730 kgCO₂e/ton cement for Batıçim and 740 kgCO₂e/ton cement for Batisöke. By embedding such measurable KPIs into the remuneration system, Batı Anadolu strengthens accountability and ensures that executives and managers contribute directly to the Group's long-term decarbonization and sustainability strategy..

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

At Batı Anadolu Group, incentives are designed to ensure that environmental and climate commitments are systematically embedded into executive decision-making. Since 2024, 16% of corporate objectives have been linked to sustainability goals through the OKR system, and these objectives are directly integrated into annual performance evaluations and remuneration. This mechanism aligns the financial interests of executives with the Group's sustainability strategy and climate transition roadmap. The performance criteria include timely climate reporting, carbon footprint reduction, energy efficiency, clinker optimization, circular economy practices, resource efficiency, and compliance with environmental regulations. Achievements in these areas are reflected in remuneration outcomes, providing a clear incentive for executives to deliver on decarbonization, water stewardship, and resource efficiency targets. From 2025 onwards, the remuneration system will explicitly include climate-specific KPIs such as carbon reduction and risk management indicators, ensuring even stronger alignment between executive incentives and the Group's climate transition plan. This linkage drives accountability, motivates progress toward the 2053 net-zero commitment, and secures continuous improvement in environmental performance.

Water

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☒ Other C-Suite Officer, please specify :Group Head-Finance and Accounting

(4.5.1.2) Incentives

Select all that apply

☒ Bonus – set figure

(4.5.1.3) Performance metrics

Targets

☒ Achievement of environmental targets

☒ Other targets-related metrics, please specify :carbon footprint reduction, energy efficiency programs, clinker optimization, circular economy initiatives, compliance with ETS/CBAM, resource efficiency

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

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

(4.5.1.5) Further details of incentives

At Batı Anadolu Group, executive remuneration is directly linked to sustainability and environmental performance through the OKR (Objectives and Key Results) system. Since 2024, 16% of corporate objectives have been tied to sustainability goals, which are integrated into the annual performance evaluation and remuneration framework. These objectives include indicators such as timely climate reporting, carbon footprint reduction, energy efficiency, clinker optimization, circular economy practices, waste management, and resource efficiency. Performance is evaluated annually, and achievements against these sustainability targets are considered in determining executive bonuses. The system ensures that managers are incentivized not only based on financial results but also on environmental performance. By embedding climate- and sustainability-related objectives into the remuneration system, Batı Anadolu strengthens accountability and aligns individual performance with the Group's long-term decarbonization and sustainability strategy. From 2025 onwards, the remuneration system will explicitly incorporate climate-specific KPIs, such as carbon reduction and risk management indicators, further aligning executive incentives with the company's environmental commitments.

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

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resource efficiency, and compliance with environmental regulations. Achievements in these areas are reflected in remuneration outcomes, providing a clear incentive for executives to deliver on decarbonization, water stewardship, and resource efficiency targets. From 2025 onwards, the remuneration system will explicitly include climate-specific KPIs such as carbon reduction and risk management indicators, ensuring even stronger alignment between executive incentives and the Group's climate transition plan. This linkage drives accountability, motivates progress toward the 2053 net-zero commitment, and secures continuous improvement in environmental performance.

Water

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☒ Other C-Suite Officer, please specify :Group Head - Marketing and Concrete

(4.5.1.2) Incentives

Select all that apply

☒ Bonus – set figure

(4.5.1.3) Performance metrics

Targets

☒ Achievement of environmental targets

☒ Other targets-related metrics, please specify :carbon footprint reduction, energy efficiency programs, clinker optimization, circular economy initiatives, compliance with ETS/CBAM, resource efficiency

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

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

(4.5.1.5) Further details of incentives

At Batı Anadolu Group, executive remuneration is directly linked to sustainability and environmental performance through the OKR (Objectives and Key Results) system. Since 2024, 16% of corporate objectives have been tied to sustainability goals, which are integrated into the annual performance evaluation and

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

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[Add row]

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

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

[Fixed row]

(4.6.1) Provide details of your environmental policies.

Row 1

(4.6.1.1) Environmental issues covered

Select all that apply

- ☒ Climate change
- ☒ Water
- ☒ Biodiversity

(4.6.1.2) Level of coverage

Select from:

- ☒ Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

- ☒ Direct operations
- ☒ Upstream value chain
- ☒ Downstream value chain

(4.6.1.4) Explain the coverage

This policy applies to all companies within the Batı Anadolu Group, including Batıçim Batı Anadolu Çimento Sanayii A.Ş., Batısöke Söke Çimento Sanayii T.A.Ş., Batıbeton Sanayi A.Ş., Batıliman Liman İşletmeleri A.Ş., Ash Plus Yapı Malzemeleri Sanayi ve Ticaret A.Ş., Batıçim Enerji Elektrik Üretim A.Ş., and Batıçim Enerji Toptan Satış A.Ş. The Group is committed to reducing emissions, improving water efficiency, protecting water resources, implementing sustainable energy management, and working with suppliers to mitigate sustainability risks, with the aim of minimizing its environmental impact across all operations and supply chain activities

(4.6.1.5) Environmental policy content

Environmental commitments

- ☒ Commitment to a circular economy strategy
- ☒ Commitment to comply with regulations and mandatory standards

- ☒ Commitment to take environmental action beyond regulatory compliance
- ☒ Commitment to avoidance of negative impacts on threatened and protected species
- ☒ Commitment to implementation of nature-based solutions that support landscape restoration and long-term protection of natural ecosystems
- ☒ Commitment to engage in integrated, multi-stakeholder landscape (including river basin) initiatives to promote shared sustainability goals

Climate-specific commitments

- ☒ Commitment to net-zero emissions

Water-specific commitments

- ☒ Commitment to control/reduce/eliminate water pollution
- ☒ Commitment to reduce water consumption volumes
- ☒ Commitment to reduce water withdrawal volumes
- ☒ Commitment to safely managed WASH in local communities

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

Select all that apply

- ☒ Yes, in line with the Paris Agreement
- ☒ Yes, in line with Sustainable Development Goal 6 on Clean Water and Sanitation
- ☒ Yes, in line with another global environmental treaty or policy goal, please specify :14001

(4.6.1.7) Public availability

Select from:

- ☒ Publicly available

(4.6.1.8) Attach the policy

surdurulebilirlik-politikasi_672241abca3c4.pdf

[Add row]

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

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

Select from:

☒ Yes

(4.10.2) Collaborative framework or initiative

Select all that apply

☒ Task Force on Climate-related Financial Disclosures (TCFD)

☒ UN Global Compact

☒ Other, please specify :CEIS, LSEG

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

As a proud participant in the UN Global Compact, Batıçim is committed to serving as a leading example of responsible business conduct within Turkey's cement sector. We actively promote and integrate the Compact's Ten Principles—covering human rights, labor, environment, and anti-corruption—throughout our value chain, suppliers, and business partnerships. By embedding these universal values, we aim not only to uphold global standards within our operations but also to encourage their broader adoption across the sector, contributing to sustainable growth and responsible industry transformation. Batıçim also aligns its governance and reporting practices with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). By following this framework in our annual sustainability and integrated reports, we provide transparent and comprehensive disclosure on the financial implications of climate-related risks and opportunities. This structured approach enables us to systematically assess transition and physical risks, embed climate considerations into our long-term strategy, and ensure that our investment decisions are consistent with a low-carbon economy. In practice, these commitments ensure that environmental, social, and governance (ESG) considerations are fully integrated into our corporate strategy. They strengthen resilience against future regulatory and market shifts, improve access to sustainable finance, and enhance trust among stakeholders. Together, the UN Global Compact and TCFD frameworks guide Batıçim in creating value for both business and society while advancing its transition toward a sustainable, climate-resilient, and inclusive future.

[Fixed row]

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

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

Select all that apply

☒ Yes, we engaged directly with policy makers

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

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

Select from:

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

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

Select all that apply

☒ Paris Agreement

☒ Sustainable Development Goal 6 on Clean Water and Sanitation

☒ Another global environmental treaty or policy goal, please specify :GRI Reporting, Global Compact

(4.11.4) Attach commitment or position statement

[surdurebilirlik-raporu-2025.pdf](#)

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

Select from:

☒ No

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

Batı Anadolu Group ensures that its external engagement activities are consistent with environmental commitments and the climate transition plan through a structured governance and reporting process. Oversight is provided by the Board of Directors and the Corporate Governance Committee, which review and approve external disclosures to confirm alignment with sustainability and climate goals. The Group engages regularly with environmental authorities, local governments, regulators, industry associations, academic institutions, and NGOs, ensuring compliance with national and international environmental frameworks. Stakeholder dialogue covers areas such as climate transition, water management, waste recovery, circular economy, and quarry rehabilitation, directly linking engagement to the

company's strategic commitments. External communication and engagement are guided by the TSRS/IFRS-based Sustainability Report and the legally required Annual Activity Report, which disclose consistent and verified data on environmental performance. This process guarantees that all external engagements are transparent, evidence-based, and aligned with the Group's long-term decarbonization and sustainability strategy.

[Fixed row]

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

Row 1

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

Turkey's environmental framework covers waste management, water use, energy efficiency and emission regulations. Key instruments include the Waste Management Regulation, Water Efficiency Regulation, Energy Efficiency Law, and Air Quality/Industrial Emissions standards. These laws set requirements for monitoring, reporting, and reduction, aligning national policy with EU Green Deal and net zero targets.

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

Select all that apply

☒ Climate change

☒ Water

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

Low-impact production and innovation

☒ Water use and efficiency

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

Select from:

☒ National

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

Select all that apply

☒ Turkey

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

Select from:

☒ Neutral

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

Select all that apply

- ☒ Regular meetings ☒ Other, please specify :**company engages with policymakers indirectly by participating in industry associations and multi-stakeholder platforms (such as cement industry working groups) where sustainability standards, emissions reduction, and resource efficiency**
- ☒ Discussion in public forums
- ☒ Responding to consultations
- ☒ Submitting written proposals/inquiries
- ☒ Participation in working groups organized by policy makers

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

0

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

The Turkish Water Management and Efficiency Regulations are highly relevant to our environmental commitments, as water scarcity is a critical risk in our operating regions. These regulations guide our transition plan by requiring systematic monitoring, efficiency measures, and reporting. They inform our actions on installing digital meters, reducing leakages, and optimizing cooling systems. Success is measured through year-on-year reductions in water withdrawal per ton of cement and full compliance with regulatory requirements. Turkish environmental laws and regulations on waste, water, energy efficiency, and emissions are fundamental to daily operations and resource efficiency targets. Engagement with regulators and local authorities ensures compliance, operational resilience, and stakeholder trust. Success of engagement is measured through: Alignment of decarbonization projects with ETS/CBAM obligations, Achievement of performance metrics such as 23.5% recycled water reuse, 12% reduction in concrete sludge, and 99.63% waste recovery, reported annually in TSRS-based reports. This process ensures that engagement with policy makers directly supports Batı Anadolu's environmental commitments, strengthens transition planning, and provides measurable outcomes.

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

Select from:

☒ Yes, we have evaluated, and it is aligned

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

Select all that apply

☒ Paris Agreement

☒ Another global environmental treaty or policy goal, please specify :IFRS S1 AND S2

Row 2

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

EU Emissions Trading System (ETS)

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

Select all that apply

☒ Climate change

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

Environmental impacts and pressures

☒ Emissions – CO2

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

Select from:

☒ National

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

Select all that apply

☒ Turkey

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

Select from:

☒ Neutral

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

Select all that apply

☒ Regular meetings

☒ Discussion in public forums

☒ Participation in voluntary government programs

☒ Submitting written proposals/inquiries

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

0

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

The EU Emissions Trading System (EU ETS) is directly relevant to our transition plan as it sets a clear carbon price signal that guides investment decisions. Although Türkiye has not yet fully implemented a national ETS, our operations are preparing for alignment through internal carbon pricing and scenario analysis. This engagement has informed our decarbonization roadmap, including our CO₂ reduction targets, clinker-to-cement ratio reduction, greater use of alternative fuels, and investments in waste heat recovery and energy efficiency. Success is measured by verified emission reductions, reduced carbon cost exposure, and compliance with evolving EU and national regulations.

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

Select from:

☒ Yes, we have evaluated, and it is aligned

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

Select all that apply

☒ Paris Agreement

☒ Another global environmental treaty or policy goal, please specify :Turkish Climate Law

Row 3

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

; EU Carbon Border Adjustment Mechanism (CBAM)

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

Select all that apply

☒ Climate change

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

Environmental impacts and pressures

☒ Emissions – CO2

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

Select from:

☒ Global

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

Select from:

☒ Neutral

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

Select all that apply

☒ Regular meetings

☒ Discussion in public forums

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

0

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

The EU Carbon Border Adjustment Mechanism (CBAM) is a critical regulation for our industry as cement is among the sectors directly covered. Our engagement focuses on preparing compliance systems, including carbon accounting, product-level emissions monitoring, and supplier data collection. CBAM has informed our transition plan by accelerating investment in clinker factor reduction, alternative fuels, and renewable electricity. Success is measured by the readiness of verified emissions reporting, the ability to minimize additional carbon costs, and maintaining market access to the EU.

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

Select from:

☒ Yes, we have evaluated, and it is aligned

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

Select all that apply

☒ Paris Agreement

Row 4

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

Türkiye Sustainability Reporting Standards (TSRS); IFRS/ISSB Sustainability Disclosure Standards (S1, S2).

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

Select all that apply

☒ Climate change

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

Transparency and due diligence

☒ Mandatory environmental reporting

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

Select from:

☒ National

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

Select all that apply

☒ Turkey

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

Select from:

☒ Neutral

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

Select all that apply

☒ Regular meetings

☒ Participation in working groups organized by policy makers

- ☒ Participation in voluntary government programs

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

0

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

Türkiye Sürdürülebilirlik Raporlama Standartları (TSRS) provide the national framework for climate and sustainability disclosure and are aligned with global ISSB/IFRS standards. For our company, TSRS ensures consistency in reporting emissions, energy, water, and resource efficiency data, while enhancing comparability within the Turkish market. This has informed our engagement by integrating CDP disclosures with TSRS-aligned sustainability reporting. Success is measured by transparent data publication, assurance processes, and alignment of our decarbonization and resource efficiency targets with Türkiye's 2053 Net Zero Strategy.

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

Select from:

- ☒ Yes, we have evaluated, and it is aligned

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

Select all that apply

- ☒ Another global environmental treaty or policy goal, please specify :IFRS Sustainability Standards

Row 5

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

ISO 14001

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

Select all that apply

- ☒ Climate change
- ☒ Water

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

Environmental impacts and pressures

- ☒ Emissions – CO2
- ☒ Water availability
- ☒ Water pollution
- ☒ Other environmental impacts and pressures, please specify :EIA

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

Select from:

- ☒ National

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

Select all that apply

- ☒ Turkey

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

Select from:

- ☒ Neutral

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

Select all that apply

- ☒ Responding to consultations

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

0

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

ISO 14001 Environmental Management System certification provides the backbone of our environmental governance. All our plants are certified and undergo regular third-party audits. ISO 14001 ensures systematic management of air emissions, waste, energy and water use, and supports continuous improvement of performance. It also informs our engagement with suppliers, as we require them to hold ISO 14001 or equivalent certifications. Success is measured through recertification results, compliance audits, and year-on-year improvements in environmental KPIs.

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

Select from:

☒ Yes, we have evaluated, and it is aligned

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

Select all that apply

☒ Another global environmental treaty or policy goal, please specify :ISO 14001:2015

Row 6

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

Monitoring, Reporting and Verification (MRV) Regulation on Greenhouse Gas Emissions

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

Select all that apply

☒ Climate change

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

Environmental impacts and pressures

☒ Emissions – CO2

☒ Emissions – other GHGs

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

Select from:

☒ Global

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

Select from:

☒ Neutral

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

Select all that apply

☒ Regular meetings

☒ Discussion in public forums

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

0

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

The Turkish Monitoring, Reporting and Verification (MRV) Regulation on Greenhouse Gas Emissions has been in force since May 2014. Under this regulation, we prepare and verify annual GHG reports for all cement plants and submit them to the Ministry of Environment, Urbanization and Climate Change. This ensures transparency, regulatory compliance, and alignment with EU climate policy. Success is measured by verified reports and continuous accuracy in emissions data.

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

Select from:

☒ Yes, we have evaluated, and it is aligned

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

Select all that apply

☒ Paris Agreement

☒ Another global environmental treaty or policy goal, please specify :AB'nin 2003/87/EC sayılı Emission Trading Directive (EU ETS Directive)

[Add row]

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

Row 1

(4.11.2.1) Type of indirect engagement

Select from:

☒ Indirect engagement via a trade association

(4.11.2.4) Trade association

Global

☒ Other global trade association, please specify :Turkish Cement Manufacturers Association (Turk Cimento)

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

Select all that apply

☒ Climate change

☒ Water

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

Select from:

☒ Consistent

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

Select from:

☒ Yes, we publicly promoted their current position

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

TürkÇimento (Turkish Cement Manufacturers' Association): Batıçim is represented on the Board of Directors, and the Group also participates in the Environment and Climate Change Permanent Committee. Batıçim is represented on the Board of Directors, and the Group participates in the Environment and Climate Change Permanent Committee. Batisöke holds a Board seat. The Group chairs the Occupational Health & Safety Committee and is a member of the Energy Stakeholders Committee.

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

1622933

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

The aim of this funding is to support industry associations in developing and promoting sector-wide sustainability, safety and environmental standards. Through our financial contributions, we enable research, stakeholder engagement, and policy dialogue on issues such as decarbonization, water efficiency, circular economy and occupational safety. This funding influences the design and implementation of national regulations (e.g., emissions reporting, waste and water management) and aligns sectoral practices with EU climate and environmental policies.

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

Select from:

☒ Yes, we have evaluated, and it is aligned

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

Select all that apply

☒ Paris Agreement

☒ Sustainable Development Goal 6 on Clean Water and Sanitation

☒ Another global environmental treaty or policy goal, please specify :United Nation Global Compact, London Stock Exchange Group's (LSEG) sustainability index

Row 2

(4.11.2.1) Type of indirect engagement

Select from:

☒ Indirect engagement via other intermediary organization or individual

(4.11.2.2) Type of organization or individual

Select from:

☒ Non-Governmental Organization (NGO) or charitable organization

(4.11.2.3) State the organization or position of individual

Batıçım is a member of both the UN Global Compact and its local network, Global Compact Türkiye. Through these memberships, the company contributes to collective initiatives on sustainability, climate action, and responsible business practices. Global Compact Türkiye coordinates national-level projects such as the Climate Accelerator Program, which supports companies in developing and implementing climate strategies, low-carbon transition roadmaps, and net-zero commitments. B

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

Select all that apply

- ☒ Climate change
- ☒ Water

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

Select from:

- ☒ Consistent

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

Select from:

- ☒ Yes, we publicly promoted their current position

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

Batıçım's sustainability commitments are fully consistent with the United Nations Global Compact's Ten Principles and the sustainability agenda promoted by Global Compact Türkiye. Both organizations emphasize human rights, labor standards, environmental protection, and anti-corruption, and Batıçım integrates these principles across its operations and strategy. Through participation in Global Compact Türkiye's Climate Accelerator Program, Batıçım aligns its climate transition roadmap with national and international net-zero targets and the Paris Agreement. The company actively contributes to working groups on climate, water stewardship, and circular economy, ensuring its corporate position supports broader collective goals. There are no differences between Batıçım's sustainability position and that of the UN Global Compact. On the contrary, Batıçım leverages its membership to influence sectoral adoption of climate strategies by sharing best practices, supporting capacity-building initiatives, and encouraging value chain partners to commit to responsible business conduct.

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

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

These are standard annual membership fees supporting participation in working groups, stakeholder engagement, and sustainability initiatives. The contributions provide platforms for policy dialogue and alignment with international sustainability frameworks but do not constitute direct funding to policy makers.

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

Select from:

☒ Yes, we have evaluated, and it is aligned

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

Select all that apply

☒ Another global environmental treaty or policy goal, please specify :UNGC

Row 3

(4.11.2.1) Type of indirect engagement

Select from:

☒ Indirect engagement via other intermediary organization or individual

(4.11.2.2) Type of organization or individual

Select from:

☒ Private company

(4.11.2.3) State the organization or position of individual

Batiçim engages with CDP, a global non-profit organization that operates as an independent disclosure platform for environmental data. Through annual reporting to CDP, Batiçim voluntarily discloses its climate, water, and sustainability performance in line with international best practices. This engagement reflects the company's commitment to transparency, alignment with investor and stakeholder expectations, and contribution to global initiatives such as the Paris Agreement and TCFD

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

Select all that apply

☒ Climate change

☒ Water

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

Select from:

☒ Consistent

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

Select from:

☒ No, we did not attempt to influence their position

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

Batiçim's position is fully consistent with CDP's mission to enhance environmental transparency and accountability. By voluntarily reporting climate, water, and sustainability data through CDP, the company aligns itself with CDP's disclosure framework and global initiatives such as the Paris Agreement and TCFD. Batiçim actively uses CDP's guidance to structure its disclosures and improve data quality, thereby ensuring comparability and transparency for stakeholders. This engagement not only reflects alignment but also reinforces Batiçim's commitment to continuous improvement in environmental performance.

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

137012

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

The funding provided through CDP membership supports the global disclosure system for companies, investors, and policymakers to measure, manage, and report environmental data. This contribution enables Batıçım to disclose standardized information on emissions, energy, water, and climate risks, strengthening transparency and accountability. By ensuring reliable and comparable environmental data is available to regulators and market actors, the funding indirectly supports the development of evidence-based climate and environmental policies. It also aligns Batıçım with international frameworks such as the Paris Agreement and the European Green Deal, reinforcing national and global transition strategies toward a low-carbon economy.

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

Select from:

- ☒ Yes, we have evaluated, and it is aligned

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

Select all that apply

- ☒ Paris Agreement
☒ Kunming-Montreal Global Biodiversity Framework
☒ Sustainable Development Goal 6 on Clean Water and Sanitation

Row 4

(4.11.2.1) Type of indirect engagement

Select from:

- ☒ Indirect engagement via other intermediary organization or individual

(4.11.2.2) Type of organization or individual

Select from:

- ☒ Research organization

(4.11.2.3) State the organization or position of individual

The funding provided through LSEG's ESG and sustainability initiatives supports the development of robust disclosure frameworks and sustainability indices that guide global capital markets. This contribution enables Batıçım to align its sustainability performance with investor expectations and international ESG benchmarks, improving transparency on climate, water, and biodiversity-related risks.

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

Select all that apply

- ☒ Climate change
- ☒ Water

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

Select from:

- ☒ Consistent

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

Select from:

- ☒ No, we did not attempt to influence their position

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

Batıçım's position is fully consistent with the sustainability principles and ESG disclosure priorities promoted by the London Stock Exchange Group (LSEG). Both organizations emphasize the integration of environmental, social, and governance considerations into financial markets and corporate decision-making. Batıçım aligns its sustainability reporting and disclosure practices with international ESG standards and actively participates in initiatives that strengthen transparency, comparability, and accountability across industries. Through its engagement with LSEG's ESG frameworks, Batıçım supports the wider adoption of standardized reporting systems that help investors evaluate climate, water, and biodiversity risks. The company's position also reinforces the need for capital markets to accelerate the transition towards a low-carbon, resource-efficient economy. Where appropriate, Batıçım contributes insights from the cement sector to ensure that disclosure standards remain practical and sector-relevant. In this way, Batıçım not only remains consistent with LSEG's ESG direction but also influences the dialogue by promoting best practices

in emissions reduction, circular economy, and sustainable resource management. This collaboration ensures that Batıçim's sustainability objectives are aligned with global financial market expectations and policy developments.

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

0

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

Select from:

☒ Yes, we have evaluated, and it is aligned

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

Select all that apply

☒ Paris Agreement

☒ Sustainable Development Goal 6 on Clean Water and Sanitation

Row 5

(4.11.2.1) Type of indirect engagement

Select from:

☒ Indirect engagement via other intermediary organization or individual

(4.11.2.2) Type of organization or individual

Select from:

☒ Non-Governmental Organization (NGO) or charitable organization

(4.11.2.3) State the organization or position of individual

THBB (Turkish Ready-Mixed Concrete Association): Batibeton is represented on the Board of Directors, and also contributes to the Environment and OHS Committee Working Group.

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

Select all that apply

☒ Climate change

☒ Water

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

Select from:

☒ Consistent

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

Select from:

☒ No, we did not attempt to influence their position

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

Batibeton is represented on the Board of Directors, ensuring active participation in governance and strategic decision-making for the ready-mixed concrete sector. In addition, Batibeton contributes to the Environment and Occupational Health & Safety (OHS) Committee Working Group, where industry-wide standards on environmental protection, resource efficiency, decarbonization, and worker safety are developed. Through these roles, Batibeton not only aligns its operations with national sustainability and safety targets but also helps shape sector-wide best practices, including the adoption of low-carbon technologies, safe construction practices, and compliance with EU-aligned environmental regulations.

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

2095114

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

The aim of this funding is to support industry associations in developing and promoting sector-wide sustainability, safety and environmental standards. Through our financial contributions, we enable research, stakeholder engagement, and policy dialogue on issues such as decarbonization, water efficiency, circular economy and occupational safety. This funding influences the design and implementation of national regulations (e.g., emissions reporting, waste and water management) and aligns sectoral practices with EU climate and environmental policies.

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

Select from:

☒ Yes, we have evaluated, and it is aligned

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

Select all that apply

☒ Another global environmental treaty or policy goal, please specify :EU Green Deal, circular economy practices, and Türkiye's Net Zero 2053 Strategy

Row 6

(4.11.2.1) Type of indirect engagement

Select from:

☒ Indirect engagement via a trade association

(4.11.2.4) Trade association

Global

☒ Other global trade association, please specify :ÇEİS (Cement Industry Employers' Association):

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

Select all that apply

- ☒ Climate change
- ☒ Water

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

Select from:

- ☒ Consistent

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

Select from:

- ☒ No, we did not attempt to influence their position

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

Batisöke's position is fully consistent with the individual's role as a Board Member at ÇEİS – Cement Industry Employers' Union. In addition to governance responsibilities, the individual contributes to regulatory processes on climate, water stewardship, and sustainability-related legislation, ensuring that employer perspectives are represented in policy discussions. Batisöke and ÇEİS share common priorities on responsible industry growth, alignment with environmental standards, and active engagement with stakeholders to advance sector-wide sustainability goals. There are no divergences between Batisöke's sustainability position and that of the Union; on the contrary, through active participation in working groups and joint initiatives, Batisöke strengthens alignment, supports policy development, and encourages the broader adoption of sustainable practices across the industry.

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

2528699

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

n addition to governance responsibilities, the individual contributes to regulatory processes on climate, water stewardship, and sustainability-related legislation, ensuring that employer perspectives are represented in policy discussions. Batişöke and ÇEİS share common priorities on responsible industry growth, alignment with environmental standards, and active engagement with stakeholders to advance sector-wide sustainability goals. There are no divergences between Batisöke's sustainability position and that of the Union; on the contrary, through active participation in working groups and joint initiatives, Batisöke strengthens alignment, supports policy development, and encourages the broader adoption of sustainable practices across the industry.

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

Select from:

- ☒ Yes, we have evaluated, and it is aligned

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

Select all that apply

- ☒ Paris Agreement
- ☒ Kunming-Montreal Global Biodiversity Framework
- ☒ Sustainable Development Goal 6 on Clean Water and Sanitation

[Add row]

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

Select from:

- ☒ Yes

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

Row 1

(4.12.1.1) Publication

Select from:

- ☒ In voluntary sustainability reports

(4.12.1.3) Environmental issues covered in publication

Select all that apply

- ☒ Climate change
☒ Water
☒ Biodiversity

(4.12.1.4) Status of the publication

Select from:

- ☒ Complete

(4.12.1.5) Content elements

Select all that apply

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

(4.12.1.6) Page/section reference

Climate Change: 84-97 Water Management: 98-99 Uur Sustainability Target And Progress: 53-55 Our sustainability strategy: 52 Governance: 28-32

(4.12.1.7) Attach the relevant publication

surdurebilirlik-raporu-2025.pdf

(4.12.1.8) Comment

Batı Anadolu Group addresses sustainability through an integrated approach that covers climate change, water stewardship, and biodiversity conservation. On climate, the company prioritizes decarbonization by reducing fossil fuel dependency, expanding the use of alternative fuels, and aligning with global frameworks such as the TCFD. Strategic targets on emissions are embedded in long-term business planning, supported by board-level oversight and cross-functional governance structures. Water efficiency is treated as a critical resource management issue. Investments in closed-loop systems, rainwater harvesting, and process optimization reduce freshwater withdrawal, while projects like Damla Damla Geleceğe strengthen community awareness and resilience. These initiatives ensure both regulatory compliance and operational efficiency. For biodiversity, the company integrates conservation into land use and raw material management. Quarry rehabilitation, afforestation, and habitat restoration projects are implemented to minimize ecosystem impacts. The Group aligns these actions with SDGs and national strategies, emphasizing the interlinkage between natural capital and corporate resilience. Through this holistic framework, Batı Anadolu positions sustainability not only as a compliance obligation but also as a source of competitive advantage, ensuring value creation for stakeholders while contributing to a low-carbon and nature-positive future.

Row 2

(4.12.1.1) Publication

Select from:

- ☒ In other regulatory filings

(4.12.1.3) Environmental issues covered in publication

Select all that apply

- ☒ Climate change

(4.12.1.4) Status of the publication

Select from:

- ☒ Complete

(4.12.1.5) Content elements

Select all that apply

- | | |
|---|--|
| <input checked="" type="checkbox"/> Strategy | <input checked="" type="checkbox"/> Value chain engagement |
| <input checked="" type="checkbox"/> Governance | <input checked="" type="checkbox"/> Public policy engagement |
| <input checked="" type="checkbox"/> Emission targets | <input checked="" type="checkbox"/> Water accounting figures |
| <input checked="" type="checkbox"/> Emissions figures | <input checked="" type="checkbox"/> Other, please specify : TRANSITION PLAN |

(4.12.1.6) Page/section reference

overnance of Sustainability Description of the Board of Directors' and committees' responsibilities for ESG topics. 📄 TSRS Report, pp. 13–16 Climate Change Management Climate-related risks, opportunities, mitigation strategies, and reporting practices. 📄 TSRS Report, pp. 17–22 Water and Resource Management Policies and performance indicators for water efficiency and sustainable use of natural resources. 📄 TSRS Report, pp. 23–26

(4.12.1.7) Attach the relevant publication

baticim-tsrs-tr (1).pdf

(4.12.1.8) Comment

Following Türkiye's adoption of IFRS S1 and S2 standards and the phased introduction of mandatory sustainability reporting requirements, Batıçım Group, as a publicly listed company, has become subject to these obligations effective from January 1, 2024. In compliance with the Turkish Sustainability Reporting Standards (TSRS), the Group has published its first mandatory sustainability report. In this report, Batıçım disclosed its climate-related risks and opportunities for the year 2024, fully aligned with TSRS and IFRS S2 principles. The disclosures provide transparency on governance structures, transition and physical risks, and opportunities for decarbonization and resource efficiency. To enhance credibility and stakeholder confidence, the report has also undergone independent assurance. This demonstrates Batıçım's proactive approach in integrating sustainability into corporate strategy, complying with national regulations, and aligning with global reporting frameworks.

[Add row]

C5. Business strategy

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

Climate change

(5.1.1) Use of scenario analysis

Select from:

☒ Yes

(5.1.2) Frequency of analysis

Select from:

☒ Annually

Water

(5.1.1) Use of scenario analysis

Select from:

☒ Yes

(5.1.2) Frequency of analysis

Select from:

☒ Annually

[Fixed row]

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

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☒ RCP 4.5

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☒ No SSP used

(5.1.1.3) Approach to scenario

Select from:

☒ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☒ Other, please specify :Scenario analyses cover the full value chain, including upstream and downstream activities

(5.1.1.5) Risk types considered in scenario

Select all that apply

☒ Policy

☒ Market

☒ Liability

☒ Reputation

☒ Technology

☒ Acute physical

☒ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☒ 2.0°C - 2.4°C

(5.1.1.7) Reference year

2022

(5.1.1.8) Timeframes covered

Select all that apply

☒ 2025

☒ 2030

☒ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☒ Changes to the state of nature

☒ Number of ecosystems impacted

☒ Changes in ecosystem services provision

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

Finance and insurance

☒ Cost of capital

Stakeholder and customer demands

☒ Consumer sentiment

☒ Consumer attention to impact

☒ Sensitivity to inequity of nature impacts

Regulators, legal and policy regimes

☒ Global regulation

☒ Level of action (from local to global)

☒ Global targets

☒ Methodologies and expectations for science-based targets

Relevant technology and science

☑ Granularity of available data (from aggregated to local)

Direct interaction with climate

☑ On asset values, on the corporate

Macro and microeconomy

☑ Domestic growth

☑ Globalizing markets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Our scenario analyses are based on explicit assumptions, subject to uncertainties and constraints, and assessed across three distinct time horizons. In the short term (0–3 years), assumptions focus on the increasing frequency of acute physical events such as floods, storms, and heatwaves that can disrupt operational processes, as well as the accelerated introduction of new regulations. We assume these risks may lead to short-term disruptions in production and immediate compliance costs. The main uncertainty relates to the speed and scope of regulatory enforcement, while constraints include the limited availability of reliable short-term market and policy data. In the medium term (4–10 years), assumptions shift toward transition dynamics. These include the implementation of carbon pricing mechanisms and the EU Carbon Border Adjustment Mechanism (CBAM), evolving customer preferences, and wider adoption of low-carbon technologies. We assume these drivers will have a material impact on financial performance through increasing operating costs, shifts in demand, and the need for investment in decarbonization strategies. The key uncertainty in this horizon is the pace of technological development and adoption across industries, while constraints include differences in regional regulatory approaches and infrastructure readiness that may slow down consistent progress. In the long term (11 years and beyond), assumptions emphasize structural changes in economies and severe physical risks. These include sea-level rise, chronic water stress, biodiversity loss, and significant declines in agricultural productivity, together with the requirement for large-scale infrastructure investment and alignment with net-zero transition pathways. Uncertainties at this stage involve the trajectory of global emissions, breakthroughs in carbon removal technologies, and the extent of international cooperation. Constraints stem from the inherent limitations of climate models in capturing localized impacts and the difficulty of forecasting socio-economic dynamics over long periods. Overall, while these assumptions provide directional guidance for strategy and risk management across the 0–3, 4–10, and 11+ year horizons, the results remain subject to uncertainties and constraints, and actual developments may diverge significantly from modeled outcomes.

(5.1.1.11) Rationale for choice of scenario

The climate scenarios applied in our analysis are based on internationally recognized IPCC Representative Concentration Pathways (RCP 4.5 and RCP 8.5). RCP 4.5 represents a stabilization pathway with emissions peaking around mid-century, while RCP 8.5 reflects a high-emission trajectory with severe physical risks, such as heatwaves, droughts, and floods. These scenarios were selected because they capture both moderate and extreme outcomes, providing a robust framework to test our resilience under different climate futures. Importantly, these scenarios were also chosen to align with Türkiye's national commitments. Türkiye has pledged to achieve net zero emissions by 2053, as announced in its Long-Term Climate Strategy. This national target requires significant decarbonization efforts in energy, industry, and infrastructure, and directly informs our transition risk assumptions. By using RCP scenarios in combination with Türkiye's 2053 Net Zero Strategy, we

ensure that our analysis captures both international scientific pathways and country-specific policy trajectories, allowing us to evaluate risks and opportunities across short (0–3 years), medium (4–10 years), and long-term (11+ years) horizons.

Water

(5.1.1.1) Scenario used

Physical climate scenarios

☒ RCP 4.5

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☒ No SSP used

(5.1.1.3) Approach to scenario

Select from:

☒ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☒ Other, please specify :Scenario analyses cover the full value chain, including upstream and downstream activities

(5.1.1.5) Risk types considered in scenario

Select all that apply

☒ Policy

☒ Market

☒ Liability

☒ Reputation

☒ Technology

☒ Acute physical

☒ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

- ☒ 2.0°C - 2.4°C

(5.1.1.7) Reference year

2022

(5.1.1.8) Timeframes covered

Select all that apply

- ☒ 2025
- ☒ 2030
- ☒ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

- ☒ Changes to the state of nature
- ☒ Number of ecosystems impacted
- ☒ Changes in ecosystem services provision
- ☒ Climate change (one of five drivers of nature change)

Finance and insurance

- ☒ Sensitivity of capital (to nature impacts and dependencies)

Stakeholder and customer demands

- ☒ Impact of nature footprint on reputation
- ☒ Impact of nature service delivery on consumer
- ☒ Sensitivity to inequity of nature impacts

Regulators, legal and policy regimes

- ☒ Global regulation

- ✓ Political impact of science (from galvanizing to paralyzing)
- ✓ Level of action (from local to global)
- ✓ Global targets
- ✓ Methodologies and expectations for science-based targets

Relevant technology and science

- ✓ Granularity of available data (from aggregated to local)
- ✓ Data regime (from closed to open)

Direct interaction with climate

- ✓ Perception of efficacy of climate regime

Macro and microeconomy

- ✓ Domestic growth
- ✓ Globalizing markets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Our water risk scenario analyses are based on assumptions, subject to uncertainties and constraints, and are assessed across three distinct time horizons. In the short term (0–3 years), assumptions focus on the potential for acute water-related physical risks such as sudden drought periods, flooding, and seasonal variability that may directly disrupt operational continuity. We assume that these risks may require immediate measures such as enhanced water efficiency projects and compliance with local regulatory changes. The main uncertainty is the intensity and frequency of near-term weather anomalies, while constraints include the limited accuracy of short-term hydrological projections and gaps in local data availability. In the medium term (4–10 years), assumptions shift toward increasing regulatory and stakeholder pressures on sustainable water management. These include the potential introduction of stricter water usage regulations, higher water tariffs, and growing expectations from customers and investors regarding efficient water use and wastewater treatment. We assume that financial implications will arise from rising operational costs and investments in water efficiency and circularity technologies. The main uncertainty lies in the pace of regulatory alignment across regions and the evolution of stakeholder expectations, while constraints are linked to differences in water resource availability and regional infrastructure capacity. In the long term (11 years and beyond), assumptions emphasize chronic water-related risks, including structural declines in freshwater availability, long-lasting droughts, and severe impacts on ecosystems that may affect raw material availability and supply chains. We assume that adaptation will require large-scale investments in alternative water sourcing, advanced recycling systems, and alignment with international frameworks for sustainable water use. Uncertainties include the degree of regional cooperation on transboundary water resources and the long-term impacts of climate change on hydrological cycles. Constraints stem from the inherent limitations of climate models in projecting localized water availability and the difficulty of forecasting socio-economic developments that drive demand for water resources. Overall, while these assumptions provide a structured approach to assessing water-related risks over the 0–3, 4–10, and 11+ year horizons, significant uncertainties and constraints remain.

(5.1.1.11) Rationale for choice of scenario

For water-related risks, our scenario selection is also linked to IPCC-aligned pathways that incorporate hydrological impacts such as drought frequency, changes in precipitation, and long-term freshwater availability. These scenarios were chosen because water is a critical input for cement production, and Türkiye is increasingly exposed to water stress and irregular seasonal patterns. The integration of Türkiye's 2053 Net Zero Strategy further reinforces the rationale for selecting water scenarios. National decarbonization targets foresee a transition in energy and industry that will increase the importance of sustainable water management, efficiency projects, and closed-loop systems. By combining IPCC scenarios with Türkiye's long-term climate commitments, we can evaluate near-term operational disruptions (0–3 years), medium-term regulatory and cost pressures (4–10 years), and long-term risks of chronic water scarcity (11+ years). This dual alignment ensures that our analysis reflects both global climate science and national strategic priorities, supporting resilient business planning.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☒ RCP 8.5

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☒ No SSP used

(5.1.1.3) Approach to scenario

Select from:

☒ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☒ Other, please specify :Scenario analyses cover the full value chain, including upstream and downstream activities

(5.1.1.5) Risk types considered in scenario

Select all that apply

- ☒ Policy
- ☒ Market
- ☒ Liability
- ☒ Reputation
- ☒ Technology

- ☒ Acute physical
- ☒ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

- ☒ 4.0°C and above

(5.1.1.7) Reference year

2022

(5.1.1.8) Timeframes covered

Select all that apply

- ☒ 2025
- ☒ 2030
- ☒ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

- ☒ Changes to the state of nature
- ☒ Number of ecosystems impacted
- ☒ Changes in ecosystem services provision
- ☒ Speed of change (to state of nature and/or ecosystem services)
- ☒ Climate change (one of five drivers of nature change)

Finance and insurance

- ☒ Cost of capital

- ☑ Sensitivity of capital (to nature impacts and dependencies)

Stakeholder and customer demands

- ☑ Consumer sentiment
- ☑ Consumer attention to impact
- ☑ Impact of nature footprint on reputation
- ☑ Impact of nature service delivery on consumer
- ☑ Sensitivity to inequity of nature impacts

Regulators, legal and policy regimes

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

Relevant technology and science

- ☑ Granularity of available data (from aggregated to local)
- ☑ Data regime (from closed to open)

Direct interaction with climate

- ☑ On asset values, on the corporate
- ☑ Perception of efficacy of climate regime

Macro and microeconomy

- ☑ Domestic growth
- ☑ Globalizing markets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Our climate scenario analyses under RCP 8.5 are based on explicit assumptions, subject to uncertainties and constraints, and assessed across three distinct time horizons. In the short term (0–3 years), assumptions focus on the increasing frequency and intensity of acute physical risks such as floods, storms, and extreme

heatwaves, which may directly disrupt operational processes. We also assume that near-term transition measures, such as accelerated introduction of local and international regulations, will add immediate compliance costs. The main uncertainty relates to the unpredictability of extreme weather events in specific geographies, while constraints include the limited accuracy of near-term climate models and insufficient localized data. In the medium term (4–10 years), assumptions reflect the intensification of both transition and physical risks. We assume rising carbon prices and the EU Carbon Border Adjustment Mechanism (CBAM) will materially affect cost structures, while simultaneously chronic physical impacts such as prolonged droughts and more frequent flooding will place additional pressure on supply chains and operational efficiency. Financial implications are expected to include higher insurance premiums, increased adaptation costs, and shifts in demand for lower-carbon solutions. The key uncertainty is the rate of technological progress and adaptation, while constraints arise from uneven regulatory enforcement and differences in infrastructure resilience across regions. In the long term (11 years and beyond), RCP 8.5 assumes a severe warming trajectory with global average temperature increases of 4°C or more by the end of the century. We assume that physical risks will dominate, including irreversible sea-level rise, chronic water stress, biodiversity loss, and major declines in agricultural productivity. These outcomes will require large-scale infrastructure adaptation, structural shifts in business models, and alignment with net-zero transition strategies, even in a high-emission environment. Uncertainties include the trajectory of global emissions if mitigation policies accelerate unexpectedly, potential breakthroughs in carbon removal, and the degree of geopolitical and international cooperation. Constraints stem from the fundamental limitations of climate models in projecting localized long-term impacts and the inherent difficulty of forecasting socio-economic dynamics over several decades.

(5.1.1.11) Rationale for choice of scenario

We selected RCP 8.5 as a climate scenario because it represents a high-emission, worst-case pathway that allows us to assess the full extent of potential physical risks. This scenario assumes that global emissions continue to rise throughout the century, leading to global warming of 4°C or more by 2100. Under this pathway, severe impacts such as extreme heatwaves, prolonged droughts, flooding, biodiversity loss, and sea-level rise are projected. The rationale for applying RCP 8.5 is to ensure that our business model is stress-tested under extreme climate conditions that could materially affect cement production, supply chains, and financial performance. Considering Türkiye's regional vulnerability to rising temperatures, irregular precipitation, and water scarcity, the use of RCP 8.5 provides a robust framework to evaluate how such severe physical risks could evolve over time. It also allows us to align our resilience planning with Türkiye's 2053 Net Zero Strategy, ensuring that even in a high-risk global trajectory, our long-term planning incorporates national transition goals.

Water

(5.1.1.1) Scenario used

Physical climate scenarios

☒ RCP 8.5

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☒ No SSP used

(5.1.1.3) Approach to scenario

Select from:

- ☒ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

- ☒ Other, please specify :Scenario analyses cover the full value chain, including upstream and downstream activities

(5.1.1.5) Risk types considered in scenario

Select all that apply

- | | |
|--|--|
| <input checked="" type="checkbox"/> Policy | <input checked="" type="checkbox"/> Acute physical |
| <input checked="" type="checkbox"/> Market | <input checked="" type="checkbox"/> Chronic physical |
| <input checked="" type="checkbox"/> Liability | |
| <input checked="" type="checkbox"/> Reputation | |
| <input checked="" type="checkbox"/> Technology | |

(5.1.1.6) Temperature alignment of scenario

Select from:

- ☒ 4.0°C and above

(5.1.1.7) Reference year

2022

(5.1.1.8) Timeframes covered

Select all that apply

- ☒ 2025
☒ 2030
☒ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

- ✓ Changes to the state of nature
- ✓ Number of ecosystems impacted
- ✓ Changes in ecosystem services provision
- ✓ Climate change (one of five drivers of nature change)

Finance and insurance

- ✓ Cost of capital
- ✓ Sensitivity of capital (to nature impacts and dependencies)

Stakeholder and customer demands

- ✓ Consumer sentiment
- ✓ Consumer attention to impact

Regulators, legal and policy regimes

- ✓ Global regulation
- ✓ Global targets

Macro and microeconomy

- ✓ Globalizing markets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Our water risk scenario analyses under RCP 8.5 are based on explicit assumptions, subject to uncertainties and constraints, and assessed across three distinct time horizons. In the short term (0–3 years), assumptions focus on the increasing frequency of acute events such as sudden droughts, flash floods, and seasonal variability, which can directly disrupt water availability for operational processes. We assume that these risks will lead to immediate compliance requirements and the need for short-term water efficiency measures. The main uncertainty is the unpredictability of extreme hydrological events in specific regions, while constraints include the limited availability of reliable short-term hydrological data. In the medium term (4–10 years), assumptions emphasize the intensification of water stress, including more frequent and prolonged drought periods, increasing competition for freshwater resources, and tighter water regulations, such as potential increases in tariffs and stricter usage limits. We assume that financial implications will arise from higher operational costs, the need for investments in water recycling and efficiency technologies, and potential supply chain disruptions due to reduced water availability. The main uncertainty concerns the pace of regulatory change and the effectiveness of adaptation technologies, while constraints are linked to regional differences in water resource management capacity and infrastructure readiness. In

the long term (11 years and beyond), RCP 8.5 assumes severe hydrological impacts, including structural declines in freshwater availability, persistent drought conditions, and substantial impacts on ecosystems and agricultural productivity. We assume that adaptation will require large-scale infrastructure investment, alternative water sourcing, and advanced circular water management systems. Uncertainties at this horizon involve the extent of global warming impacts on hydrological cycles, cross-border cooperation on shared water resources, and future socio-economic demand for freshwater. Constraints stem from the inherent limitations of long-term hydrological and climate models in projecting localized impacts and the difficulty of forecasting socio-economic drivers several decades into the future. Overall, the RCP 8.5 scenario highlights the severe physical risks that water scarcity poses for our operations and supply chains.

(5.1.1.11) Rationale for choice of scenario

We selected RCP 8.5 as a climate scenario because it represents a high-emission, worst-case pathway that allows us to assess the full extent of potential physical risks. This scenario assumes that global emissions continue to rise throughout the century, leading to global warming of 4°C or more by 2100. Under this pathway, severe impacts such as extreme heatwaves, prolonged droughts, flooding, biodiversity loss, and sea-level rise are projected. The rationale for applying RCP 8.5 is to ensure that our business model is stress-tested under extreme climate conditions that could materially affect cement production, supply chains, and financial performance. Considering Türkiye's regional vulnerability to rising temperatures, irregular precipitation, and water scarcity, the use of RCP 8.5 provides a robust framework to evaluate how such severe physical risks could evolve over time. It also allows us to align our resilience planning with Türkiye's 2053 Net Zero Strategy, ensuring that even in a high-risk global trajectory, our long-term planning incorporates national transition goals.

Water

(5.1.1.1) Scenario used

Water scenarios

☒ WRI Aqueduct

(5.1.1.3) Approach to scenario

Select from:

☒ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☒ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

- ☒ Acute physical
- ☒ Chronic physical

(5.1.1.7) Reference year

2022

(5.1.1.8) Timeframes covered

Select all that apply

- ☒ 2025
- ☒ 2030
- ☒ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

- ☒ Number of ecosystems impacted
- ☒ Changes in ecosystem services provision

Relevant technology and science

- ☒ Granularity of available data (from aggregated to local)

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Batiçim Group's engagement with CDP reflects its commitment to transparent and science-based disclosure on climate-related risks, opportunities, and governance structures. By participating in CDP's annual reporting system, Batiçim ensures that its climate risk management and sustainability practices are benchmarked against international best practices. The company acknowledges that transparent disclosure is a driving factor in investor confidence, regulatory compliance, and alignment with Türkiye's pathway toward integration with the EU Green Deal. The company's decision to join CDP and maintain active membership is based on the assumption that climate-related reporting will become increasingly material for both financial and strategic decision-making. CDP's standardized questionnaires enable Batiçim to provide consistent information on greenhouse gas emissions, energy efficiency, water usage, and climate governance practices, which are also aligned with Türkiye's forthcoming Emissions Trading System (ETS) and regulatory frameworks. Through its CDP disclosures, Batiçim contributes to enhancing sectoral transparency in the Turkish cement industry, creating a knowledge base that supports low-carbon transition pathways. Batiçim's participation in CDP is closely linked with its broader risk

management processes. By disclosing climate risks and opportunities, the company identifies potential regulatory, market, and physical risks while integrating them into its enterprise risk management framework. This includes scenario analyses that draw on WRI and IEA climate pathways, assessing long-term implications for carbon pricing, energy transition, and raw material use. CDP also provides Batıçim with an external platform to benchmark its decarbonization strategy, enabling the company to evaluate its progress against both global peers and local industry standards. Uncertainties remain, particularly regarding the implementation timeline and design of Türkiye's ETS, the volatility of global energy markets, and the scaling of carbon capture and alternative fuel technologies. Nevertheless, Batıçim considers CDP reporting an essential step in addressing these uncertainties, as it allows for systematic monitoring, third-party verification, and enhanced stakeholder dialogue. The annual membership fee dedicated to CDP is regarded as a strategic investment to strengthen transparency, accountability, and alignment with international expectations.

(5.1.1.11) Rationale for choice of scenario

Batıçim selected climate scenarios such as those developed by the World Resources Institute (WRI) to ensure alignment with internationally recognized, science-based frameworks. These scenarios provide robust pathways for assessing sector-specific risks and opportunities, particularly in the energy- and carbon-intensive cement industry. The rationale for using WRI and IEA scenarios is based on their ability to reflect both global and regional decarbonization trends, including the transition to low-carbon technologies, carbon pricing developments, and regulatory pathways such as the EU Green Deal and Türkiye's planned Emissions Trading System (ETS). By relying on these authoritative scenarios, Batıçim ensures consistency with global best practices, while also maintaining relevance to Türkiye's national climate commitments. Additionally, the chosen scenarios offer detailed insights into market, technology, and policy drivers, enabling Batıçim to evaluate long-term impacts on raw material use, energy mix, and operational costs. This supports the company's strategic planning by providing decision-useful data on how different transition pathways could influence competitiveness, investment requirements, and resilience. In conclusion, the rationale for selecting these scenarios is their credibility, transparency, and applicability to both international reporting requirements (IFRS S1 and S2) and Türkiye's evolving regulatory landscape. They allow Batıçim to stress-test its business model against multiple climate futures, ensuring that identified risks and opportunities are integrated into its sustainability and financial planning.

[Add row]

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

Climate change

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

Select all that apply

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

(5.1.2.2) Coverage of analysis

Select from:

- ☒ Other, please specify :entire value chain

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

Our climate scenario analyses, based on IPCC Representative Concentration Pathways (RCP 4.5 and 8.5), provide critical insights into how both transition and physical risks could impact our business across short (0–3 years), medium (4–10 years), and long-term (11+ years) horizons. These outcomes are also aligned with Türkiye's 2053 Net Zero Strategy, ensuring that our approach incorporates both international scientific pathways and national climate commitments. Under RCP 4.5, outcomes emphasize transition risks. Global emissions peak mid-century with gradual reductions, creating increasing exposure to carbon pricing mechanisms, the EU Carbon Border Adjustment Mechanism (CBAM), and domestic regulatory frameworks. Implications include rising compliance costs, the necessity of strengthening emissions monitoring, and accelerated deployment of decarbonization technologies. Operationally, this requires ongoing integration of renewable energy, lower clinker ratios, and continuous process optimization. Under RCP 8.5, outcomes are dominated by severe physical risks. Global warming above 4 °C by 2100 implies extreme heatwaves, droughts, and flooding that could disrupt operations, supply chains, and raw material availability. Financial outcomes include higher insurance premiums, increased adaptation capex, and greater financing risks as investors increasingly integrate physical risk into capital allocation. Long-term resilience requires climate-proofing infrastructure and embedding water stress management via WRI Aqueduct assessments. Cross-scenario outcomes reinforce the need to embed climate considerations across all business processes. Capital allocation is increasingly guided by resilience criteria, ensuring new investments are robust under both moderate and extreme outcomes. Supply chain management incorporates climate risk screening, and operational efficiency programs now deliver both cost savings and compliance resilience. Broader environmental implications include impacts on biodiversity and natural resources. Rising temperatures and extreme events amplify ecosystem risks, confirming the importance of circular economy practices, waste recovery, and alternative fuels to simultaneously reduce emissions and resource dependency. In conclusion, climate scenario analysis demonstrates that our business is exposed to both transition- and physical-driven risks. RCP 2.6 highlights opportunities to accelerate decarbonization in line with SBTi and EU Taxonomy expectations, RCP 4.5 underlines the regulatory and cost pressures of transition, and RCP 8.5 stresses the urgency of adaptation to severe physical risks. Aligning with Türkiye's 2053 Net Zero Strategy strengthens our preparedness, ensuring that our long-term strategy addresses both global and national climate imperatives.

Water

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

Select all that apply

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

(5.1.2.2) Coverage of analysis

Select from:

☒ Other, please specify :entire value chain

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

Our water risk scenario analyses, aligned with IPCC RCP pathways (4.5 and 8.5), highlight the material importance of water stewardship for our operations, supply chains, and long-term sustainability. As cement production is a water-intensive activity, the outcomes of these scenarios emphasize that water is both a critical operational resource and a major environmental issue. These analyses are particularly relevant for Türkiye, which is already classified as a water-stressed country and faces increasing risks from climate change. Under RCP 4.5, outcomes suggest gradual but significant intensification of water-related transition risks. Anticipated changes include tighter regulatory requirements for industrial water use, higher tariffs, and stronger monitoring and disclosure expectations. For our operations, this means increased compliance obligations, rising operational costs, and the need for investment in water efficiency technologies. Scenario analysis outcomes highlight the role of closed-loop water systems, wastewater recycling, and advanced treatment facilities in maintaining operational resilience. Financial implications include both risk (higher costs) and opportunity (enhanced competitiveness through leadership in sustainable water use). Under RCP 8.5, outcomes are much more severe. This high-emission trajectory projects structural declines in freshwater availability, more frequent and prolonged droughts, and greater variability in precipitation patterns. For our sector, this translates into systemic stress across operations and supply chains: limited water availability could constrain production capacity, raw material extraction could be disrupted, and logistics could be affected by physical water-related challenges. Outcomes also include increased competition for freshwater resources with other sectors and communities, potentially leading to stricter regulations and reputational risks. Financially, RCP 8.5 highlights major adaptation costs, higher insurance premiums, and long-term risks to profitability if water scarcity is not adequately addressed. Cross-scenario outcomes underscore that water management is no longer an isolated operational issue but a strategic business concern. Scenario analysis has led to the prioritization of investments in water efficiency, recycling technologies, and water stewardship programs. It has also influenced supply chain management, encouraging supplier selection and evaluation based on water risk exposure. Furthermore, outcomes have reinforced the integration of water-related risk into financial forecasting, capital planning, and risk management frameworks. Broader environmental implications extend beyond direct operational use. Water scarcity has cascading impacts on ecosystems, agriculture, and local communities. Scenario outcomes highlight that reduced water availability can exacerbate biodiversity loss, soil degradation, and land-use pressures, creating interconnected environmental challenges. For our sector, this means that water stewardship must be embedded in a broader sustainability framework that considers ecosystem health, community resilience, and cross-sectoral cooperation. In conclusion, the outcomes of water scenario analyses confirm that water is a critical strategic issue for our business. RCP 4.5 emphasizes regulatory and efficiency-related challenges, requiring continuous improvement in water management practices, while RCP 8.5 underscores the existential risks of severe water scarcity under high-emission futures. Together, these outcomes validate the need to integrate water stewardship into strategic planning, operational processes, supply chain management, and financial decision-making. By aligning with global scientific scenarios and Türkiye's 2053 Net Zero Strategy, we ensure that our water strategy is resilient, future-focused, and supportive of both environmental sustainability and long-term business continuity.

[Fixed row]

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

(5.2.1) Transition plan

Select from:

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

(5.2.3) Publicly available climate transition plan

Select from:

☒ Yes

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

Select from:

☒ Yes

(5.2.5) Description of activities included in commitment and implementation of commitment

Our transition plan is designed to align our business with global climate pathways and Türkiye's 2053 Net Zero Strategy, ensuring resilience against both transition and physical risks. The plan is built on three pillars: decarbonization of operations, circular economy practices, and sustainable finance integration. Decarbonization of operations focuses on reducing direct (Scope 1) and indirect (Scope 2) emissions through the adoption of best-available technologies. Key measures include the reduction of clinker ratios in cement, the use of alternative raw materials, and the integration of alternative fuels to decrease fossil fuel dependency. We are accelerating investments in renewable energy sourcing and energy efficiency projects across production facilities. These actions are aligned with international pathways such as the IPCC RCP 4.5 scenario and are critical for meeting national and EU-level compliance requirements, including the Carbon Border Adjustment Mechanism (CBAM). Circular economy practices form the second pillar of the plan. By advancing waste recovery and co-processing, we aim to reduce resource dependency and simultaneously cut emissions. Water stewardship is another critical dimension, with projects to implement closed-loop systems, wastewater reuse, and efficiency improvements to mitigate increasing water stress. This integrated approach addresses not only climate but also broader environmental issues such as biodiversity protection and resource efficiency. Sustainable finance integration ensures that our climate strategy is embedded in financial decision-making. We recognize that capital markets and investors increasingly factor climate risk into financing decisions. As such, the transition plan incorporates scenario-based stress testing to capture the potential financial implications of both transition and physical risks. This includes rising carbon costs, energy price volatility, and adaptation investments. Financial planning explicitly integrates carbon pricing assumptions and the potential impacts of CBAM, supporting transparent reporting and risk disclosure. Governance is a cornerstone of the transition plan. The Board of Directors and Sustainability Committee oversee implementation, with climate-related KPIs embedded into corporate strategy and risk management frameworks. This governance structure ensures accountability, transparency, and alignment with the recommendations of TCFD and CDP requirements.

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

Select from:

☒ Our climate transition plan is voted on at AGMs and we also have an additional feedback mechanism in place

(5.2.8) Description of feedback mechanism

Our climate transition plan is reviewed and approved by the Board-level Sustainability Committee, ensuring that shareholders and stakeholders are indirectly involved in the decision-making process. To capture stakeholder perspectives and integrate them into our climate strategy, we have established a series of effective feedback mechanisms. First, the Sustainability Committee, composed of senior executives and functional leaders, meets regularly to review the climate strategy, monitor progress towards science-based targets, and align shareholder and stakeholder expectations with the corporate agenda. The Committee also coordinates with subcommittees and working groups to ensure that climate-related risks and opportunities are effectively embedded into business processes. Second, Batıçim actively follows regulatory updates, sectoral working groups, and industry associations to support the implementation of best practices. Through these forums, the company collects insights from regulators, experts, and peers and channels them into management decision-making. Third, direct engagement with shareholders is ensured through one-on-one meetings, seminars, information sessions, and written Q&A processes. Feedback is systematically gathered through the Investor Relations unit, evaluated, and shared with relevant committees. Additionally, as part of our transparency commitment, Batıçim publishes an annual Sustainability Report aligned with international frameworks, including TCFD (Task Force on Climate-related Financial Disclosures). This provides stakeholders with opportunities to give structured feedback on our performance. Finally, reporting is conducted through CDP, enabling monitoring of our targets and ensuring transparent communication channels. This mechanism is aligned with the Science Based Targets initiative (SBTi), supporting the systematic collection of stakeholder feedback.

(5.2.9) Frequency of feedback collection

Select from:

☒ More frequently than annually

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

Our climate transition plan relies on key assumptions and dependencies aligned with national and international frameworks. These include compliance with Türkiye's environmental regulations and IFRS S1/S2 standards, as well as alignment with TCFD and the European Green Deal. The plan assumes steady progress in reducing GHG emissions through energy efficiency, clinker ratio optimization, waste co-processing, and renewable energy integration. It also depends on the availability and scalability of low-carbon technologies such as carbon capture and alternative fuels. Stable market conditions and access to green finance are assumed to support capital-intensive projects, while fluctuations in energy and carbon prices represent uncertainties. Stakeholder engagement through associations (e.g., Turkish Cement Manufacturers' Association), NGOs, CDP, and UN Global Compact is a core dependency, ensuring alignment with sector-wide roadmaps and climate policies. Finally, the plan assumes organizational commitment, including governance oversight and employee engagement, to integrate climate targets into performance and decision-making processes.

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

Batiçim has developed a comprehensive transition plan to align its operations with a low-carbon economy, supported by Board-level oversight and measurable milestones. The plan is built on a decarbonization roadmap with short, medium, and long-term targets to reduce GHG emissions in line with global climate goals. Actions include energy efficiency upgrades, greater use of alternative fuels and raw materials, renewable energy deployment, and the future integration of innovative technologies such as carbon capture and storage (CCS). The transition strategy is underpinned by scenario analyses aligned with the IEA Net Zero Emissions by 2050 (NZE) and the Sustainable Development Scenario (SDS). These analyses enable the company to evaluate climate-related risks and opportunities, stress-test business resilience, and ensure alignment with key regulatory frameworks such as the EU Green Deal, the Emissions Trading System (ETS), and the Carbon Border Adjustment Mechanism (CBAM). Risk and opportunity management is embedded in the plan. Physical risks such as water stress and extreme weather events are considered alongside transition risks including rising carbon costs and regulatory tightening. Opportunities are pursued in green finance instruments (e.g., sustainability-linked loans and green bonds), circular economy initiatives, and low-clinker cement technologies that strengthen competitiveness and market resilience. Governance of the transition plan is led by the Board of Directors, supported by the Corporate Governance and Sustainability Committees, ensuring accountability and oversight. Progress is tracked through defined KPIs, regularly monitored and reported at Board level. The plan also emphasizes a just transition, including workforce reskilling and stakeholder engagement across the value chain. Collaboration with policymakers, industry associations, and suppliers further ensures the plan's effectiveness and alignment with both national and international climate targets.

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

[surdurebilirlik-raporu-2025.pdf](#), [BaticcimBatiAnadoluCCimento2024TSRSUyumluSurdurulebilirlikRaporu.pdf](#)

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

Select all that apply

- ☒ Water
- ☒ Biodiversity
- ☒ Other, please specify :In addition to greenhouse gas mitigation, our climate transition plan also addresses a broad range of environmental issues. such as Water management

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

In addition to greenhouse gas mitigation, our climate transition plan also addresses a broad range of environmental issues. Water management is a core focus: we aim to reduce specific water consumption across our facilities to 0.25 m³ per ton of cement equivalent by 2053, supported by projects that enhance water efficiency and resilience against drought and water stress. Waste management and circular economy practices are another pillar of our plan. We are progressively increasing the share of alternative fuels, targeting 20% usage by 2030, and already producing 13% of our electricity needs from waste heat recovery systems. These initiatives both reduce carbon emissions and minimize waste sent to landfill. Biodiversity and land stewardship are integrated into our operations, particularly in quarry sites, where ecosystem monitoring and land rehabilitation projects are implemented to mitigate ecological impact. Our climate transition plan also encompasses energy efficiency and infrastructure transformation. Investments include waste heat recovery plants, alternative fuel facilities, and electrification projects such as electric cranes at our port operations, all of which contribute to lower energy intensity and reduced environmental footprint. Finally, air quality management is considered alongside GHG emissions. We monitor and implement measures to control particulate matter, NO_x, and SO_x emissions, ensuring compliance with regulations and

improving local air quality. By addressing these issues in a comprehensive and integrated manner, our climate transition plan goes beyond carbon reduction to support broader environmental sustainability goals, aligned with national and international frameworks.
[Fixed row]

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

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

Select from:

☒ Yes, both strategy and financial planning

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

Select all that apply

☒ Products and services

☒ Upstream/downstream value chain

☒ Investment in R&D

☒ Operations

[Fixed row]

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

Products and services

(5.3.1.1) Effect type

Select all that apply

☒ Risks

☒ Opportunities

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

Select all that apply

☒ Climate change

☒ Water

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

Environmental risks and opportunities have had a profound impact on our product and service strategy. On the risk side, transition risks such as carbon pricing and the EU's Carbon Border Adjustment Mechanism (CBAM) directly affect the competitiveness of our cement exports. Increasing carbon costs place pressure on our margins, making it imperative to accelerate the shift toward products with a lower carbon footprint. At the same time, changing customer demand presents both a risk and an opportunity. Clients in infrastructure and construction increasingly require sustainable building materials, and failure to adapt to these expectations could result in market share loss. Physical risks also influence our product strategy. Water scarcity and droughts may constrain production processes that rely on water for cooling and processing. Furthermore, sea level rise poses a risk to port operations at Batiliman, which plays a critical role in cement and clinker exports. These risks emphasize the need for product diversification and innovation to ensure resilience. In response, our climate transition plan embeds opportunities for innovation and differentiation. We are expanding our portfolio of low-carbon cements, including blended cements with lower clinker content and supplementary cementitious materials. These products significantly reduce the carbon intensity per ton of cement while meeting performance standards required by our customers. We are also integrating circular economy practices into product development by increasing the use of alternative raw materials and waste-derived fuels, which simultaneously reduce environmental impact and create market value. A key element of our strategy is the investment in waste heat recovery plants and alternative fuel facilities, which allow us to both reduce emissions and lower production costs. In 2024, 13% of our total electricity demand was met through waste heat recovery, and our alternative fuel utilization rate reached 8.6%. We aim to increase this share to 20% by 2030, which will further strengthen the competitiveness of our low-carbon products. Our customers recognize the value of these initiatives. By offering greener cement and contributing to sustainable infrastructure development, we not only mitigate regulatory and market risks but also enhance our reputation as a responsible producer. This is further reinforced by our alignment with international standards such as the EU Green Deal and the Science Based Targets initiative (SBTi). Overall, environmental risks and opportunities have driven us to embed sustainability at the core of our product strategy. This includes R&D investments in innovative cement blends, integration of circular economy principles, and proactive adaptation to regulatory and market dynamics. By doing so, we ensure that our products remain competitive, resilient to climate-related risks, and aligned with the growing demand for sustainable solutions in the construction sector.

Upstream/downstream value chain

(5.3.1.1) Effect type

Select all that apply

☒ Risks

☒ Opportunities

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

Select all that apply

☒ Climate change

☒ Water

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

Environmental risks and opportunities across our upstream and downstream value chain have strongly influenced our strategy. On the upstream side, our operations are highly dependent on raw materials such as clinker, limestone, and gypsum. Risks include potential scarcity of raw materials, rising costs of fossil fuels and electricity, and water stress that may disrupt both our production and supplier operations. Furthermore, smaller suppliers may face challenges in complying with environmental regulations, creating operational and reputational risks. To mitigate these risks, our climate transition plan focuses on diversifying inputs and building resilience through circular economy practices. We are progressively increasing the use of industrial by-products such as fly ash and slag as supplementary materials, reducing reliance on virgin raw materials. In parallel, we are scaling up alternative fuels. In 2024, 8.6% of our kiln fuel mix came from waste-derived fuels, and we target to increase this to 20% by 2030. By engaging with suppliers on sustainability performance and integrating environmental criteria into procurement, we aim to lower Scope 3 emissions and strengthen long-term supply security. On the downstream side, regulatory risks such as the EU's Carbon Border Adjustment Mechanism (CBAM) increase export-related costs and put pressure on margins. In addition, customers in construction and infrastructure are rapidly shifting their procurement policies towards low-carbon and sustainable products. Failure to adapt to these requirements could lead to market share loss. At the same time, the downstream value chain offers significant opportunities. Demand for blended and low-clinker cements is growing, and we are responding with innovative product offerings that reduce carbon intensity while meeting performance standards. By positioning ourselves as a supplier of sustainable solutions for green infrastructure projects, we create new market opportunities and strengthen our brand reputation. Collaborations with concrete producers and construction companies further enable joint emission reduction and innovation across the value chain. Overall, integrating environmental risks and opportunities into our value chain strategy ensures that both our supply base and customer relationships are aligned with our climate transition plan. This holistic approach enhances resilience, reduces exposure to regulatory and resource risks, and positions us to benefit from the growing demand for sustainable construction solutions. This assessment is based on the Batıçim Batı Anadolu Çimento 2024 TSRS-compliant Sustainability Report, which is publicly available and prepared in line with national reporting standards.

Investment in R&D

(5.3.1.1) Effect type

Select all that apply

☒ Risks

☒ Opportunities

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

Select all that apply

☒ Climate change

☒ Water

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

Environmental risks and opportunities have strongly shaped our R&D investment strategy. On the risk side, the cement industry is highly exposed to carbon pricing and regulatory pressures, particularly under mechanisms such as the EU CBAM. Without significant investment in innovative solutions, traditional high-carbon products risk losing competitiveness. However, developing and scaling up new technologies entails high capital costs and uncertainties regarding commercial feasibility. There is also a market acceptance risk, as new cement formulations must meet stringent performance standards and customer expectations. At the same time, opportunities arising from R&D are considerable. We are prioritizing the development of blended and low-clinker cements, leveraging supplementary cementitious materials such as fly ash and slag to reduce the carbon footprint of our products. This directly responds to customer demand for sustainable construction solutions and aligns with international regulatory trends. In addition, our R&D activities focus on increasing the use of alternative fuels and improving energy efficiency, both of which contribute to decarbonization targets. Our R&D agenda also includes exploring breakthrough technologies such as carbon capture and utilization, as well as digital monitoring tools that will allow real-time tracking of emissions and optimization of production processes. These innovations strengthen our ability to comply with evolving regulations, enhance transparency, and reduce transition risks. Beyond regulatory compliance, R&D investments enhance our competitive position. By offering innovative, lower-carbon products, we can capture new market opportunities in green infrastructure projects and strengthen our brand reputation as a sustainable producer. Moreover, R&D investments attract climate-focused investors and financing opportunities, creating long-term value for our stakeholders. Overall, R&D is both a necessity and a strategic opportunity in our climate transition plan. By allocating resources to innovative product development, alternative raw materials, and advanced technologies, we ensure that our company remains resilient to climate risks while positioning itself at the forefront of sustainable construction solutions. This assessment is based on the Batıçim Batı Anadolu Çimento 2024 TSRS-compliant Sustainability Report, which is publicly available and prepared in line with national reporting standards.

Operations

(5.3.1.1) Effect type

Select all that apply

- ☒ Risks
- ☒ Opportunities

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

Select all that apply

- ☒ Climate change
- ☒ Water

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

Environmental risks and opportunities have fundamentally shaped our operational strategy. Our production processes are highly energy- and carbon-intensive, making them especially vulnerable to transition risks such as carbon pricing and regulatory mechanisms like the EU's Carbon Border Adjustment Mechanism (CBAM). These policies increase operational costs and accelerate the need to decarbonize our facilities. At the same time, physical risks, particularly water scarcity and droughts, threaten the stability of our operations, as cement production requires significant amounts of water for cooling and processing. Rising sea levels further pose a direct risk to Batiliman, our key export hub, with potential disruptions to clinker and cement shipments. Additionally, extreme weather events could lead to energy supply interruptions and logistical challenges. To mitigate these risks and leverage opportunities, we have embedded several initiatives into our climate transition plan. We have implemented the ISO 50001 Energy Management System since 2014/2015, ensuring continuous improvements in operational efficiency and energy performance. In 2024, 13% of our total electricity demand was supplied through waste heat recovery plants, and we are expanding this capacity with new investments, particularly at our Batisöke facility. We have also reached an alternative fuel utilization rate of 8.6% and target to increase this to 20% by 2030, significantly reducing our reliance on fossil fuels. Furthermore, we are investing in digital infrastructure to strengthen operational resilience. By 2025, we will have a centralized system in place for continuous emissions monitoring, enabling real-time data collection, compliance with carbon pricing mechanisms, and proactive decision-making to optimize processes. This digitalization will enhance transparency and improve our ability to manage both transition and physical risks. Through these measures, environmental risks and opportunities are directly integrated into our operational strategy. By prioritizing energy efficiency, renewable energy, circular economy practices, and advanced monitoring systems, we are ensuring that our operations remain resilient, cost-effective, and aligned with the global transition to a low-carbon economy. This assessment is based on the Batıçim Batı Anadolu Çimento 2024 TSRS-compliant Sustainability Report, which is publicly available and prepared in line with national reporting standards.

[Add row]

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

Row 1

(5.3.2.1) Financial planning elements that have been affected

Select all that apply

- ☒ Revenues
- ☒ Direct costs
- ☒ Capital expenditures

(5.3.2.2) Effect type

Select all that apply

- ☒ Risks
- ☒ Opportunities

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

Select all that apply

☒ Climate change

☒ Water

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

Environmental risks and opportunities have a direct and measurable impact on our revenues, and these impacts are fully integrated into our financial planning. Transition risks remain the most significant. Mechanisms such as the EU's Carbon Border Adjustment Mechanism (CBAM) and potential domestic carbon pricing increase the cost of carbon-intensive production, thereby reducing export competitiveness. According to the Batıçim Batı Anadolu Çimento 2024 TSRS-compliant Sustainability Report, the annual financial impact of these measures has been quantified at approximately –1.81% of revenues. This analysis underscores how regulatory developments directly affect our revenue base and necessitate a strategic response. Physical risks are also material for our revenue planning. Water scarcity and droughts, which can limit production capacity, were assessed in the same report as having a potential –0.32% impact on revenues. Additionally, sea level rise poses a direct threat to Batılman port operations, which play a critical role in clinker and cement exports. Any disruption in port logistics would reduce international sales and negatively affect cash flow. These quantified risks highlight the vulnerability of revenue streams to both transition and physical climate impacts. At the same time, environmental opportunities create pathways for revenue growth. Customer demand for sustainable construction materials is rising rapidly. By expanding our portfolio of blended and low-clinker cements, incorporating supplementary cementitious materials such as fly ash and slag, we are creating new revenue streams and strengthening our market share. Public procurement criteria and private sector investments increasingly prioritize low-carbon materials, positioning our greener products as a competitive advantage. Operational efficiency gains also play a role in safeguarding revenues. In 2024, 13% of our electricity demand was met through waste heat recovery, while alternative fuel utilization reached 8.6%, with a target of 20% by 2030. These initiatives lower production costs, protect margins against rising carbon prices, and allow us to offer competitively priced low-carbon products, thereby reinforcing revenue stability. Overall, environmental risks and opportunities are explicitly reflected in our revenue forecasts and financial planning. are balanced against clear opportunities from sustainable product demand, energy efficiency, and circular economy initiatives.

[Add row]

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

	Identification of spending/revenue that is aligned with your organization's climate transition	Methodology or framework used to assess alignment with your organization's climate transition
	<i>Select from:</i> <input checked="" type="checkbox"/> Yes	<i>Select all that apply</i> <input checked="" type="checkbox"/> Other methodology or framework

[Fixed row]

(5.4.1) Quantify the amount and percentage share of your spending/revenue that is aligned with your organization's climate transition.

Row 1

(5.4.1.1) Methodology or framework used to assess alignment

Select from:

☒ Other, please specify :In the absence of an official sustainable finance taxonomy in Türkiye, we assess the alignment of our spending and revenue with our climate transition plan by applying the principles of Türkiye Sürdürülebilirlik Raporlama Standartları (TSRS) together

(5.4.1.5) Financial metric

Select from:

☒ Revenue/Turnover

(5.4.1.6) Amount of selected financial metric that is aligned in the reporting year (currency)

243430547

(5.4.1.7) Percentage share of selected financial metric aligned in the reporting year (%)

0

(5.4.1.8) Percentage share of selected financial metric planned to align in 2025 (%)

5

(5.4.1.9) Percentage share of selected financial metric planned to align in 2030 (%)

10

(5.4.1.12) Details of the methodology or framework used to assess alignment with your organization’s climate transition

Batiçim applies a structured financial risk methodology to quantify and disclose the materiality of climate-related impacts. The approach is based on a financial materiality threshold of 0.25% of annual revenue (~33.6 million TRY in 2024). Any impact above this level is classified as substantive and receives priority in strategic and operational decision-making. Risks and opportunities are evaluated through a matrix combining impact magnitude and likelihood, producing three tiers: High Impact: ≥0.25% of revenue, high likelihood. Medium Impact: 0.1–0.25% of revenue, medium-to-high likelihood. Low Impact: <0.1% of revenue, moderate likelihood. This methodology enables management to transparently link climate-related spending, risks, and opportunities to financial performance. It also ensures that resources are allocated toward the most material transition factors. In 2024, scenario analysis under the EU Carbon Border Adjustment Mechanism (CBAM) and the expected Turkish Emissions Trading System (ETS) showed a potential financial effect equivalent to 1.81% of revenue, far exceeding the materiality threshold. This estimate was calculated using a carbon price assumption of €65/tCO₂ for EU exports. The analysis incorporated projected free allocation rates in the first year of ETS implementation (97.5%) and CBAM adjustments, producing a robust forecast of net financial exposure. By quantifying the carbon pricing impact at 1.81% of revenue, Batiçim illustrates how the methodology captures climate-related transition risks that are both strategically significant and financially material. The outcome informs investment priorities such as alternative fuels, clinker substitution, energy efficiency, and compliance infrastructure. Governance of this methodology is anchored in the Sustainability Committee and integrated into the Early Risk Detection Committee, ensuring that climate transition financial risks are continuously monitored, updated, and embedded into enterprise-wide planning.

[Add row]

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

(5.5.1) Investment in low-carbon R&D

Select from:

☒ Yes

(5.5.2) Comment

Our organization invests in research and development (R&D) as a core component of its climate transition plan. According to the Batıçim Batı Anadolu Çimento 2024 TSRS-compliant Sustainability Report, our R&D agenda is directly linked to the decarbonization of cement production and the creation of low-carbon solutions for the construction sector. A primary focus of our R&D activities is the development of blended and low-clinker cements. By incorporating supplementary cementitious materials such as fly ash and slag, we reduce the clinker factor of our products and therefore the carbon intensity per ton of cement. These efforts not only mitigate transition risks associated with carbon pricing and the EU CBAM but also respond to the growing customer demand for sustainable construction materials. In 2024, low-carbon cement products already represented a growing share of revenues, and R&D investments are critical to expanding this portfolio further. Our R&D work also addresses the use of alternative fuels and raw materials. We are testing and improving technologies that allow higher substitution rates of waste-derived fuels, biomass, and other renewable sources in our kilns. The 2024 utilization rate of 8.6% is planned to increase to 20% by 2030, supported by ongoing R&D on fuel preparation, feeding systems, and combustion efficiency. Similarly, we are expanding research on circular economy approaches, including the valorization of industrial by-products in cement production. In addition, our R&D portfolio includes energy efficiency and breakthrough technologies. We invest in waste heat recovery optimization, digital monitoring systems for real-time emissions tracking (to be operational by 2025). These projects are designed to prepare our operations for future regulatory frameworks while enhancing transparency and operational resilience. Through these initiatives, our R&D investments are explicitly aligned with our climate transition strategy. They mitigate material risks such as higher production costs and regulatory exposure while opening opportunities to access green markets, finance, and innovation-driven growth.

[Fixed row]

(5.5.1) Provide details of your organization’s investments in low-carbon R&D for cement production activities over the last three years.

Row 1

(5.5.1.1) Technology area

Select from:

☒ Low clinker cement

(5.5.1.2) Stage of development in the reporting year

Select from:

☒ Small scale commercial deployment

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

20.4

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

1220763

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

25

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

Batiçim's R&D investments in alternative low-CO₂ cements and binders form a central pillar of its climate transition plan. As emphasized in the 2024 TSRS-compliant Sustainability Report and confirmed in the 2025 Report, the development of blended and low-clinker cements remains one of the company's top priorities. These products incorporate supplementary cementitious materials such as fly ash and blast furnace slag, which enable a reduction in the clinker factor of cement. Since clinker production is the most carbon-intensive part of cement manufacturing, lowering the clinker ratio is one of the most effective ways to reduce Scope 1 emissions. In 2024, Batiçim increased the share of blended cement products in its portfolio, a trend expected to continue in the next five years. R&D expenditures—2.08 million TL in 2022, 3.37 million TL in 2023, and 5.38 million TL in 2024—reflect a growing commitment to innovation in low-carbon products. According to internal assessments, R&D spending in 2024 represented approximately 22.7% of total investments, a significant share directed primarily toward alternative binders, making this the single largest focus area within the R&D strategy. The establishment of a dedicated R&D Center further ensures that resources will be consistently directed toward the expansion of sustainable products in the coming years. These R&D investments directly support Batiçim's climate commitments and net-zero pathway. Reducing clinker intensity contributes to the company's Scope 1 reduction targets and prepares it for regulatory frameworks such as the EU Carbon Border Adjustment Mechanism (CBAM) by lowering the embodied CO₂ content of exported cement. The development of low-clinker products also responds to rising customer demand for sustainable construction materials, aligning environmental objectives with long-term market competitiveness. Looking ahead, Batiçim has set clear goals: the clinker-to-cement ratio will be reduced to 0.7 by 2030 and 0.5 by 2050. The share of sustainable cements in total sales will reach 80% by 2030 and 100% by 2053. Through these efforts, Batiçim demonstrates that R&D in alternative low-CO₂ binders is not only a technical necessity but also a strategic driver of its climate transition plan. It reduces emissions, ensures compliance with future regulations, supports the national shift to a low-carbon industry, and positions the company as a reliable partner in sustainable construction.

Row 2

(5.5.1.1) Technology area

Select from:

☒ Fuel switching

(5.5.1.2) Stage of development in the reporting year

Select from:

☒ Small scale commercial deployment

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

25.5

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

1710143

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

30

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

Our R&D investments in fuel transition are directly aligned with Batıçım’s climate transition plan and its commitment to reducing dependency on fossil fuels. As reported in the 2024 TSRS-compliant Sustainability Report and emphasized again in the 2025 Sustainability Report, increasing the share of alternative fuels—such as biomass and refuse-derived fuels (RDF)—is one of the company’s primary decarbonization levers. In 2024, approximately 20% of total R&D expenditures were allocated to fuel transition projects, reflecting ongoing pilot-scale applications and the optimization of co-processing technologies. Over the next five years, Batıçım plans to increase this share to around 30%, ensuring that a greater portion of innovation resources supports the scaling of alternative fuel use in clinker production. Fuel transition R&D serves three critical purposes: Mitigating carbon pricing risks: reducing exposure to Türkiye’s planned Emissions Trading System (ETS) and the EU Carbon Border Adjustment Mechanism (CBAM). Enhancing energy security: lowering dependence on imported fossil fuels by utilizing locally available biomass and waste-derived feedstocks. Supporting circular economy goals: valorizing waste streams through safe and efficient co-processing, while optimizing resource use. Batıçım has set a clear target for the future: by 2030, the share of alternative fuels in total thermal energy consumption will reach 30%. This commitment reflects the company’s determination to accelerate its decarbonization pathway, integrate circular practices into operations, and align with both national and international climate goals. Through these R&D investments, Batıçım demonstrates that fuel transition is not only a technological necessity but also a strategic enabler of its climate transition plan. It reduces greenhouse gas emissions, prepares the company for regulatory changes, strengthens resilience in energy supply, and reinforces Batıçım’s role as a reliable partner in sustainable construction.

Row 3

(5.5.1.1) Technology area

Select from:

☒ Control systems

(5.5.1.2) Stage of development in the reporting year

Select from:

☒ Pilot demonstration

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

10.2

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

430225

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

13

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

Within Batıçim's climate transition plan, digitalization and process control systems play a critical role in enabling technologies that improve energy efficiency and reduce emissions. As emphasized in the 2024 TSRS Sustainability Report, the company invests in energy monitoring, digital optimization of kiln and mill operations, automated control systems, and software solutions that enhance process efficiency—all of which directly contribute to reducing carbon intensity. In 2024, approximately 8% of the total R&D budget was allocated to control systems. These investments are currently at the pilot demonstration stage, where selected plant units are testing the performance and efficiency gains of digital solutions under operational conditions. Data collected from these pilot applications are systematically evaluated to guide future large-scale integration. The alignment with Batıçim's climate commitments is clear. By reducing heat losses, optimizing fuel consumption, and ensuring auxiliary equipment operates based on efficiency criteria, control systems deliver measurable reductions in both energy use and indirect CO₂ emissions. Furthermore, the adoption of predictive maintenance and analytics extends equipment life, minimizes resource waste, and strengthens the company's circular economy approach. Over the next five years, Batıçim plans to maintain the share of control systems in total R&D investments at around 10–15%. While this may appear modest compared to other technology areas, the strategic importance of control systems lies in their role as enablers: rather than replacing core low-carbon solutions such as alternative fuels, low-clinker cements, or high-temperature process improvements, they are designed to maximize the efficiency and effectiveness of these solutions. In summary, Batıçim's investments in digital and control technologies represent a supportive but strategic element of its low-carbon transition pathway. By embedding advanced digital tools and control systems, the company strengthens operational resilience, optimizes energy and resource consumption, and accelerates progress toward its net-zero and sustainability commitments.

Row 4

(5.5.1.1) Technology area

Select from:

☒ Waste heat recovery

(5.5.1.2) Stage of development in the reporting year

Select from:

☒ Large scale commercial deployment

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

23

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

1102451

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

15

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

High-temperature heating systems represent one of the most critical areas in Batıçim's decarbonization pathway, as cement production is inherently energy-intensive and requires extremely high process temperatures. According to the 2024 TSRS Sustainability Report, Batıçim continues to prioritize kiln efficiency improvements, thermal process optimization, and waste heat recovery (WHR) systems, all of which directly support emission reductions and operational resilience. In 2024, approximately 15% of the total R&D budget was allocated to projects in high-temperature heating, making it one of the largest R&D focus areas. These investments are already at the stage of large-scale commercial deployment, reflecting Batıçim's commitment to the full operational integration of WHR systems, improved kiln refractories, optimized combustion systems, and advanced energy efficiency upgrades. The contribution of these technologies to Batıçim's climate transition is twofold: Direct reductions in Scope 1 emissions: by improving energy efficiency and lowering fossil fuel demand, while enhancing cost competitiveness under tightening carbon regulations. Reduction of Scope 2 emissions: through WHR integration, which supports circular energy use by converting surplus thermal energy into electricity, reducing dependence on purchased power. Looking ahead, Batıçim expects to dedicate 15 -20 % of total R&D spending to high-temperature heating

technologies over the next five years. This consistent commitment reflects the company's recognition that thermal energy use is one of the most fundamental decarbonization challenges in the cement sector. The company has also set clear long-term targets: WHR utilization will reach 20% by 2030 and 25% by 2053. A new Waste Heat-to-Energy facility at Batisöke has been launched, designed to increase energy efficiency and reduce carbon emissions. In summary, Batıçim's investments in high-temperature heating technologies are closely aligned with its climate commitments and net-zero transition plan. Beyond lowering its environmental footprint, these initiatives also strengthen long-term competitiveness by reducing production costs, enhancing energy security, and improving resilience to climate-related regulatory and market risks

Row 5

(5.5.1.1) Technology area

Select from:

☒ Other, please specify :Alternative raw material

(5.5.1.2) Stage of development in the reporting year

Select from:

☒ Large scale commercial deployment

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

20.9

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

914228

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

15

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

Alternative raw materials are by-products that, due to their mineral properties, can be used as inputs in cement plants. By replacing conventional raw materials, they reduce clinker demand and contribute to the conservation of natural resources. Their use is therefore both an environmental necessity and a strategic lever for

Batiçim's climate transition plan. In 2024, Batiçim achieved a 22% increase in the use of alternative raw materials compared to 2023. As of 2024, the Batı Anadolu Group's share of alternative raw materials in total cement production reached 8.1%. This progress reflects the company's systematic approach to valorizing industrial by-products, reducing dependency on virgin raw materials, and lowering the clinker factor, which directly reduces Scope 1 emissions. Looking ahead, Batiçim has set a clear target: by 2030, the share of alternative raw materials will rise to 15%. Achieving this milestone will further reduce clinker intensity, cut CO₂ emissions, and minimize the extraction of natural resources. These efforts align with both national sustainability goals and sectoral roadmaps defined by the Turkish Cement Manufacturers' Association (TÇMB). The integration of alternative raw materials also strengthens Batiçim's contribution to the circular economy. By safely reusing suitable by-products from industrial processes, the company reduces waste disposal needs, creates value from secondary streams, and fosters collaboration with local industries. This approach not only improves environmental performance but also supports long-term cost competitiveness in a sector increasingly shaped by carbon pricing mechanisms and resource efficiency requirements. In summary, the use of alternative raw materials at Batiçim is both a technical enabler and a strategic driver of the company's decarbonization plan. It lowers emissions by reducing clinker content, conserves natural resources, and reinforces Batiçim's role as a reliable partner in sustainable construction. With a target of 15% substitution by 2030, Batiçim is clearly committed to scaling up its efforts and accelerating progress toward net-zero.

Row 6

(5.5.1.1) Technology area

Select from:

☒ Carbon capture, utilization, and storage (CCUS)

(5.5.1.2) Stage of development in the reporting year

Select from:

☒ Basic academic/theoretical research

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

0

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

0

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

2

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

Carbon capture, utilization and storage (CCUS) is a critical long-term solution for the cement industry, as process emissions from clinker production cannot be fully eliminated through efficiency measures or alternative raw materials. At Batıçim, CCUS is recognized as an unavoidable technology for achieving net zero. Currently, carbon capture is at the research and feasibility stage within the company. Over the next five years, Batıçim plans to allocate approximately 2% of total R&D investments to studies, pilot trials, and partnerships focused on CCUS. This allocation reflects the company's strategic priority to explore capture technologies suitable for cement kilns, assess integration with waste heat recovery systems, and evaluate storage or utilization options in line with Türkiye's industrial decarbonization roadmap. By dedicating resources to this area, Batıçim demonstrates its commitment to preparing for the deployment of breakthrough technologies. Although no large-scale implementation has yet begun, the planned 2% investment in the next five years ensures that carbon capture will remain firmly embedded in the company's innovation agenda, positioning Batıçim to adopt and scale these solutions as they become technically and economically viable.

[Add row]

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

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

-8

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

637

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

10

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

6

(5.9.5) Please explain

In 2024, climate-related CAPEX decreased by 8% vs. 2023. However, in the first seven months of 2025, CAPEX rose sharply to 8.656 million TL, compared to 1.281 million TL in 2023 (+637%). This increase stems from water efficiency projects, such as helical systems in concrete plants to enhance recycling, and digital meters, line replacements, and pump upgrades in cement plants. While such growth is not expected to continue at the same pace over the next five years, investments in water and resource efficiency will remain a priority. OPEX rose by 6% in the first seven months of 2025, mainly due to higher electricity costs, a trend likely to persist. CAPEX is focused on long-term transition infrastructure, while OPEX reflects operating costs under rising energy prices. Both streams are tracked to ensure transparency and alignment with Batıçim's climate transition strategy.

[Fixed row]

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

(5.10.1) Use of internal pricing of environmental externalities

Select from:

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

(5.10.3) Primary reason for not pricing environmental externalities

Select from:

☒ Other, please specify :Batıçim has not yet implemented internal carbon pricing. The primary reason is that the regulatory framework for carbon pricing mechanisms in Türkiye has not been finalized. However, the EU Carbon Border Adjustment Mechanism (CBAM) and upcoming natio

(5.10.4) Explain why your organization does not price environmental externalities

Although our organization does not yet apply a formal internal carbon price, we assess the potential financial impacts of carbon pricing through scenario analysis in line with TSRS and TFRS reporting requirements. In particular, we take into account the EU Carbon Border Adjustment Mechanism (CBAM) and the anticipated establishment of a national emissions trading system in Türkiye. While no direct internal pricing mechanism is currently in place, these considerations are already integrated into our investment and strategic decision-making processes, and we anticipate the introduction of internal carbon pricing in the medium term

[Fixed row]

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

	Engaging with this stakeholder on environmental issues	Environmental issues covered
Suppliers	<i>Select from:</i> <input checked="" type="checkbox"/> Yes	<i>Select all that apply</i> <input checked="" type="checkbox"/> Climate change <input checked="" type="checkbox"/> Water
Customers	<i>Select from:</i> <input checked="" type="checkbox"/> Yes	<i>Select all that apply</i> <input checked="" type="checkbox"/> Climate change <input checked="" type="checkbox"/> Water
Investors and shareholders	<i>Select from:</i> <input checked="" type="checkbox"/> Yes	<i>Select all that apply</i> <input checked="" type="checkbox"/> Climate change <input checked="" type="checkbox"/> Water
Other value chain stakeholders	<i>Select from:</i> <input checked="" type="checkbox"/> Yes	<i>Select all that apply</i> <input checked="" type="checkbox"/> Climate change <input checked="" type="checkbox"/> Water

[Fixed row]

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

Climate change

(5.11.1.1) Assessment of supplier dependencies and/or impacts on the environment

Select from:

☒ Yes, we assess the dependencies and/or impacts of our suppliers

(5.11.1.2) Criteria for assessing supplier dependencies and/or impacts on the environment

Select all that apply

- ☒ Contribution to supplier-related Scope 3 emissions
- ☒ Dependence on water
- ☒ Dependence on ecosystem services/environmental assets
- ☒ Impact on water availability
- ☒ Impact on pollution levels

(5.11.1.3) % Tier 1 suppliers assessed

Select from:

- ☒ 76-99%

(5.11.1.4) Define a threshold for classifying suppliers as having substantive dependencies and/or impacts on the environment

Batıçım defines a financial and environmental materiality threshold to classify suppliers as having substantive dependencies and/or impacts on the environment. carbon intensity threshold – suppliers providing carbon-intensive inputs such as coal, petcoke, and clinker are automatically classified as substantive, Water stress threshold – suppliers operating in regions of High or Extremely High water stress, as classified by the WRI Aqueduct Water Risk Atlas, are deemed substantive

(5.11.1.5) % Tier 1 suppliers meeting the threshold for substantive dependencies and/or impacts on the environment

Select from:

- ☒ 26-50%

(5.11.1.6) Number of Tier 1 suppliers meeting the thresholds for substantive dependencies and/or impacts on the environment

38

Water

(5.11.1.1) Assessment of supplier dependencies and/or impacts on the environment

Select from:

☒ Yes, we assess the dependencies and/or impacts of our suppliers

(5.11.1.2) Criteria for assessing supplier dependencies and/or impacts on the environment

Select all that apply

- ☒ Basin/landscape condition
- ☒ Dependence on water
- ☒ Dependence on ecosystem services/environmental assets
- ☒ Impact on water availability

(5.11.1.3) % Tier 1 suppliers assessed

Select from:

- ☒ 76-99%

(5.11.1.4) Define a threshold for classifying suppliers as having substantive dependencies and/or impacts on the environment

Batiçim defines a financial and environmental materiality threshold to classify suppliers as having substantive dependencies and/or impacts on the environment. Carbon intensity threshold – suppliers providing carbon-intensive inputs such as coal, petcoke, and clinker are automatically classified as substantive. Water stress threshold – suppliers operating in regions of High or Extremely High water stress, as classified by the WRI Aqueduct Water Risk Atlas, are deemed substantive

(5.11.1.5) % Tier 1 suppliers meeting the threshold for substantive dependencies and/or impacts on the environment

Select from:

- ☒ 26-50%

(5.11.1.6) Number of Tier 1 suppliers meeting the thresholds for substantive dependencies and/or impacts on the environment

38

[Fixed row]

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

Climate change

(5.11.2.1) Supplier engagement prioritization on this environmental issue

Select from:

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

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

Select all that apply

- ☒ Material sourcing
- ☒ Procurement spend
- ☒ Regulatory compliance
- ☒ Business risk mitigation
- ☒ Leverage over suppliers
- ☒ Vulnerability of suppliers
- ☒ Strategic status of suppliers
- ☒ Supplier performance improvement
- ☒ In line with the criteria used to classify suppliers as having substantive dependencies and/or impacts relating to climate change

(5.11.2.4) Please explain

For Batıçim, prioritization of supplier engagement on climate-related issues is based on a risk- and impact-driven methodology aligned with our sustainability and TSRS framework. Suppliers are classified as higher priority if they belong to critical raw material and energy categories (such as coal, petcoke, clinker, aggregates, and chemical additives) that have significant carbon footprints, or if they represent more than 20% of total supply. Geographic exposure is also a key factor: suppliers located in regions with high or extremely high climate-related risks, including those facing elevated water stress, drought intensity, or air quality challenges, are assessed more closely. According to WWF and WRI Aqueduct data, many of our Tier 1 suppliers operate in areas such as Manisa, Muğla, Aydın, and Denizli, where climate risks overlap with high agricultural and industrial resource use, amplifying overall exposure. Engagement is prioritized through our Digital Supplier Portal, launched in 2024, which enables systematic data collection on emissions, energy efficiency, and climate risk management practices. We provide feedback and action plans to suppliers with substantive climate dependencies, focusing on capacity-building rather than immediate sanctions, in order to support continuous improvement. This approach allows us to reduce Scope 3 emissions, address transition and physical climate risks, and strengthen resilience across the value chain

Water

(5.11.2.1) Supplier engagement prioritization on this environmental issue

Select from:

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

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

Select all that apply

- ☒ Regulatory compliance
- ☒ Business risk mitigation
- ☒ Leverage over suppliers
- ☒ Vulnerability of suppliers
- ☒ Strategic status of suppliers
- ☒ In line with the criteria used to classify suppliers as having substantive dependencies and/or impacts relating to water

(5.11.2.4) Please explain

For Batıçım, prioritization of supplier engagement on water-related issues is guided by a methodology that combines materiality and geographical risk. Suppliers are classified as higher priority if they belong to water-intensive raw material and energy categories (such as coal, clinker, aggregates, and chemical additives) or if they represent more than 20% of total supply. Geographical risk (suppliers in water-stressed or high-emission regions) is a key factor in this assessment. According to WWF and WRI Aqueduct data, many Tier 1 suppliers are concentrated in Manisa (Soma–Gediz Basin), Muğla (Yatağan–Milas), Aydın (Büyük Menderes Basin), and Denizli (upper Büyük Menderes Basin). These areas face high agricultural water use, severe summer drought, and overlapping industrial demand, which amplify the risk of supply chain disruptions. Engagement with suppliers focuses on water stewardship practices, risk mapping, and efficiency measures. Through the Digital Supplier Portal introduced in 2024, suppliers are requested to disclose water use, recycling, and local risk management strategies. Feedback is provided to support action plans, particularly for suppliers in high-risk basins, with the aim of building resilience and reducing exposure to physical water risks. This prioritization ensures that engagement targets the suppliers with the greatest dependencies and impacts, enabling Batıçım to safeguard resource security, strengthen value chain resilience

[Fixed row]

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

Climate change

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

Select from:

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

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

Select from:

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

(5.11.5.3) Comment

Batiçim requires its suppliers to comply with environmental requirements as an integral part of the procurement process. Suppliers are expected to operate in line with national environmental legislation, and priority is given to those holding ISO 14001 Environmental Management System certification. In addition, suppliers in critical raw material and energy categories (such as coal, petcoke, clinker, aggregates, and chemical additives) are assessed against specific sustainability criteria, including climate risk, water stress, and emissions intensity. Environmental performance and compliance are embedded into supplier evaluations and audits, ensuring that procurement decisions contribute to reducing the overall environmental footprint of the value chain. This approach enables Batiçim to foster proactive collaboration with suppliers, mitigate upstream environmental risks, and strengthen alignment with long-term sustainability goals.

Water

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

Select from:

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

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

Select from:

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

(5.11.5.3) Comment

Batiçim requires its suppliers to comply with environmental requirements as an integral part of the procurement process. Suppliers are expected to operate in line with national environmental legislation, and priority is given to those holding ISO 14001 Environmental Management System certification. In addition, suppliers in critical raw material and energy categories (such as coal, petcoke, clinker, aggregates, and chemical additives) are assessed against specific sustainability criteria, including climate risk, water stress, and emissions intensity. Environmental performance and compliance are embedded into supplier evaluations and audits, ensuring that procurement decisions contribute to reducing the overall environmental footprint of the value chain. This approach enables Batiçim to foster proactive collaboration with suppliers, mitigate upstream environmental risks, and strengthen alignment with long-term sustainability goals.

[Fixed row]

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

Climate change

(5.11.6.1) Environmental requirement

Select from:

- ☒ Regular environmental risk assessments (at least once annually)

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

- ☒ Certification
- ☒ Grievance mechanism/ Whistleblowing hotline
- ☒ Supplier scorecard or rating
- ☒ Other, please specify :Batiçim conducts climate scenoria analyses as well

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

Select from:

- ☒ 76-99%

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

Select from:

☒ 76-99%

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

Select from:

☒ 76-99%

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

Select from:

☒ 76-99%

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

Select from:

☒ Suspend and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:

☒ Less than 1%

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply

☒ Developing quantifiable, time-bound targets and milestones to bring suppliers back into compliance

(5.11.6.12) Comment

Batiçim requires its Tier 1 suppliers to comply with robust environmental and climate-related requirements, reflecting the company's TSRS-aligned transition plan. All critical suppliers in categories such as coal, petcoke, clinker, aggregates, chemical additives, energy and logistics are expected to conduct at least one environmental risk assessment annually. These assessments must address climate risks, GHG emissions, energy consumption, water use, waste management and circularity practices. Compliance with national legislation and EU regulations (including CBAM) is mandatory, and suppliers are required to maintain valid environmental permits

and licenses. Supplier audits, conducted through Batıçim's Supplier Audit Form, systematically review carbon footprint reporting, fuel consumption, waste disposal practices, energy efficiency programs, and climate adaptation measures. Non-compliance triggers corrective action plans with follow-up monitoring, and repeated violations can lead to suspension of the business relationship. In addition, Batıçim prioritizes suppliers that demonstrate measurable progress in low-carbon technologies and resource efficiency. Capacity-building activities, training sessions, and engagement programs are used to strengthen suppliers' ability to meet climate goals. This integrated approach ensures alignment between Batıçim's climate transition strategy and its supply chain, mitigating Scope 3 risks and supporting a credible pathway toward net-zero.

Water

(5.11.6.1) Environmental requirement

Select from:

- ☒ Regular environmental risk assessments (at least once annually)

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

- ☒ Certification
- ☒ Grievance mechanism/ Whistleblowing hotline
- ☒ Supplier scorecard or rating
- ☒ Other, please specify :Batıçim conducts geographical risk mapping of suppliers using external water and climate risk tools such as WWF Water Risk Filter and WRI Aqueduct. This approach allows the company to identify suppliers located in high water-stressed or high-emission

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

Select from:

- ☒ 76-99%

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

Select from:

- ☒ 76-99%

(5.11.6.5) % tier 1 suppliers with substantive environmental dependencies and/or impacts related to this environmental issue required to comply with this environmental requirement

Select from:

☒ 76-99%

(5.11.6.6) % tier 1 suppliers with substantive environmental dependencies and/or impacts related to this environmental issue that are in compliance with this environmental requirement

Select from:

☒ 76-99%

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

Select from:

☒ Suspend and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:

☒ Less than 1%

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply

☒ Developing quantifiable, time-bound targets and milestones to bring suppliers back into compliance

(5.11.6.12) Comment

Batiçim requires its Tier 1 suppliers to comply with strict water-related environmental requirements, aligned with TSRS reporting standards and the Turkish Water Efficiency Regulation. All suppliers operating in high or extremely high water-stress regions (e.g. Manisa, Muğla, Aydın, Denizli) and in water-intensive categories such as clinker, aggregates, chemical additives, and energy are subject to enhanced monitoring. Suppliers must conduct at least one annual water risk assessment, covering consumption volumes, efficiency practices, wastewater management, and compliance with discharge permits. The Supplier Audit Form includes specific checkpoints on water efficiency, monitoring systems, reuse and recycling capacity, and alignment with best available techniques. Suppliers are required to implement closed-loop cooling, optimize process water, and report on progress toward reducing withdrawals in line with Batiçim's climate and water strategies. Compliance with the national Water Efficiency Regulation is mandatory, ensuring that suppliers contribute to the collective reduction of water stress in Turkey's critical regions. Non-compliance leads to corrective action plans, and failure to address issues can result in suspension of the supplier relationship. Batiçim also prioritizes suppliers that demonstrate investments in advanced water recovery technologies and wastewater treatment.

Climate change

(5.11.6.1) Environmental requirement

Select from:

- ☒ Compliance with an environmental certification, please specify :ISO 14001

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

- ☒ Certification
- ☒ Grievance mechanism/ Whistleblowing hotline
- ☒ Supplier scorecard or rating
- ☒ Other, please specify :Batiçim conducts geographical risk mapping of suppliers using external water and climate risk tools such as WWF Water Risk Filter and WRI Aqueduct. This approach allows the company to identify suppliers located in high water-stressed or high-emission

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

Select from:

- ☒ 76-99%

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

Select from:

- ☒ 76-99%

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

Select from:

- ☒ 76-99%

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

Select from:

☒ 76-99%

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

Select from:

☒ Suspend and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:

☒ Less than 1%

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply

☒ Developing quantifiable, time-bound targets and milestones to bring suppliers back into compliance

(5.11.6.12) Comment

Batiçim requires all Tier 1 suppliers to comply with robust climate-related environmental standards as part of its purchasing and audit processes. A key requirement is compliance with an internationally recognized Environmental Management System, most notably ISO 14001, which ensures that suppliers have structured processes to monitor and reduce their environmental impacts. Suppliers must provide valid certification or demonstrate equivalent internal management systems. In addition, Batiçim recommends suppliers to measure and disclose their greenhouse gas (GHG) emissions, particularly Scope 1 and Scope 2, in line with the methodologies outlined in the TSRS and GHG Protocol. Suppliers in critical raw material and energy categories (such as coal, petcoke, clinker, aggregates, and chemical additives) are prioritized for stricter monitoring given their significant contribution to Scope 3 emissions in Batiçim's value chain. These suppliers must submit annual emission data, including energy consumption, fuel type, and reduction initiatives. The Supplier Audit Form includes specific questions on climate-related performance, such as energy efficiency measures, use of low-carbon alternatives, and alignment with national and international reporting standards. Regular audits are conducted, and suppliers without verifiable emissions data or certifications are required to implement corrective action plans within a defined timeframe.

Water

(5.11.6.1) Environmental requirement

Select from:

- ☒ Compliance with an environmental certification, please specify :ISO 14001 Environmental Management System

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

- ☒ Certification
- ☒ Grievance mechanism/ Whistleblowing hotline
- ☒ Supplier scorecard or rating
- ☒ Other, please specify :Batiçim conducts geographical risk mapping of suppliers using external water and climate risk tools such as WWF Water Risk Filter and WRI Aqueduct. This approach allows the company to identify suppliers located in high water-stressed or high-emission

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

Select from:

- ☒ 76-99%

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

Select from:

- ☒ 76-99%

(5.11.6.5) % tier 1 suppliers with substantive environmental dependencies and/or impacts related to this environmental issue required to comply with this environmental requirement

Select from:

- ☒ 76-99%

(5.11.6.6) % tier 1 suppliers with substantive environmental dependencies and/or impacts related to this environmental issue that are in compliance with this environmental requirement

Select from:

☒ 76-99%

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

Select from:

☒ Suspend and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:

☒ Less than 1%

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply

☒ Developing quantifiable, time-bound targets and milestones to bring suppliers back into compliance

(5.11.6.12) Comment

Batıçım requires its Tier 1 suppliers to comply with water-related environmental standards that go beyond legal obligations, as water use and quality are critical risks for the cement value chain. All suppliers are expected to maintain an Environmental Management System, with ISO 14001 certification as a minimum standard. For water-intensive suppliers, particularly those located in high or extremely high water-stressed regions (e.g., Manisa, Muğla, Aydın, Denizli), compliance with ISO 14046 Water Footprint standards or equivalent monitoring practices is encouraged. Suppliers must regularly measure and disclose their water use, wastewater generation, and treatment performance, aligned with the Water Efficiency Regulation in Türkiye and TSRS reporting requirements. This includes data on freshwater withdrawals, recycling/reuse rates, and compliance with discharge limits. Suppliers in raw material and chemical additive categories are required to provide annual water balance reports and demonstrate the adoption of water-saving technologies such as closed-loop cooling systems or advanced treatment units. The Supplier Audit Form specifically includes water risk assessment criteria, focusing on operational sites in water-sensitive regions. Suppliers are also asked to identify potential physical, regulatory, and reputational water risks, and to present mitigation actions. Non-compliance triggers corrective action plans, with follow-up audits to ensure improvements.

Climate change

(5.11.6.1) Environmental requirement

Select from:

☒ Disclosure of GHG emissions to your organization (Scope 1 and 2)

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

- ☒ Certification
- ☒ Grievance mechanism/ Whistleblowing hotline
- ☒ Supplier scorecard or rating
- ☒ Other, please specify :Batiçim has also griveance mechanism for supplier

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

Select from:

- ☒ 76-99%

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

Select from:

- ☒ 76-99%

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

Select from:

- ☒ 76-99%

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

Select from:

- ☒ 76-99%

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

Select from:

- ☒ Suspend and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:

- ☒ Less than 1%

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply

- ☒ Developing quantifiable, time-bound targets and milestones to bring suppliers back into compliance

(5.11.6.12) Comment

Batıçım requires its Tier 1 suppliers, particularly those in carbon- and energy-intensive categories (coal, petcoke, clinker, aggregates, chemical additives, and logistics), to measure and disclose their GHG emissions on a regular basis. At a minimum, suppliers must annually report Scope 1 and Scope 2 emissions using internationally recognized standards such as the GHG Protocol or ISO 14064, and integrate this data into their ISO 14001 Environmental Management Systems. Suppliers with significant climate impact are strongly encouraged to also report Scope 3 emissions, particularly in logistics and transport, as these account for a substantial share of Batıçım's supply chain footprint. In addition to disclosure, suppliers are expected to provide data on energy use, carbon intensity (e.g., CO₂ per ton of product), and progress toward mitigation actions, including alternative fuel use, renewable energy sourcing, and clinker ratio reduction. They should also align with Türkiye's net-zero commitments and, where possible, international initiatives such as the Science-Based Targets initiative (SBTi). Compliance is monitored through Batıçım's Supplier Audit Program. Non-disclosure or lack of progress triggers corrective action plans, and persistent non-compliance may affect supplier qualification. These requirements ensure that supplier engagement is consistent with Batıçım's TSRS-compliant sustainability reporting, CDP disclosures, and long-term net-zero transition plan.

Climate change

(5.11.6.1) Environmental requirement

Select from:

- ☒ Waste and resource reduction and material circularity

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

- ☒ Certification
☒ Grievance mechanism/ Whistleblowing hotline

☒ Supplier scorecard or rating

☒ Other, please specify :Batiçim conducts geographical risk mapping of suppliers using external water and climate risk tools such as WWF Water Risk Filter and WRI Aqueduct. This approach allows the company to identify suppliers located in high water-stressed or high-emission

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

Select from:

☒ 76-99%

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

Select from:

☒ 76-99%

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

Select from:

☒ 76-99%

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

Select from:

☒ 76-99%

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

Select from:

☒ Suspend and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:

- ☒ Less than 1%

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply

- ☒ Developing quantifiable, time-bound targets and milestones to bring suppliers back into compliance

(5.11.6.12) Comment

For Batıçım, the vast majority of Tier 1 suppliers are raw material and energy providers (such as coal, petcoke, clinker, aggregates, and chemical additives). These suppliers operate in highly regulated industries where compliance with environmental legislation (e.g., emission limits, waste management, wastewater discharge permits, and environmental licenses) is legally mandatory. As a result, more than 95% of Tier 1 suppliers by procurement spend are required to comply with such environmental requirements as a condition for maintaining their operating licenses and continuing to supply Batıçım. % Tier 1 suppliers by procurement spend in compliance with this environmental requirement Given that raw material and energy suppliers cannot operate without holding valid permits and meeting regulatory thresholds, Batıçım estimates that over 90% of Tier 1 procurement spend is with suppliers already in compliance. Compliance is monitored through supplier documentation (environmental permits, ISO 14001 certifications), contractual requirements, and, where relevant, audits. In cases of non-compliance or loss of permits, Batıçım's policy is to suspend procurement contracts and seek alternative suppliers to ensure uninterrupted and legally compliant supply.

Climate change

(5.11.6.1) Environmental requirement

Select from:

- ☒ Implementation of a climate transition plan

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

- ☒ Certification
- ☒ Grievance mechanism/ Whistleblowing hotline
- ☒ Supplier scorecard or rating
- ☒ Other, please specify :Batıçım conducts geographical risk mapping of suppliers using external water and climate risk tools such as WWF Water Risk Filter and WRI Aqueduct. This approach allows the company to identify suppliers located in high water-stressed or high-emission

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

Select from:

☒ 76-99%

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

Select from:

☒ 76-99%

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

Select from:

☒ 76-99%

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

Select from:

☒ 76-99%

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

Select from:

☒ Suspend and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:

☒ Less than 1%

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply

☒ Developing quantifiable, time-bound targets and milestones to bring suppliers back into compliance

(5.11.6.12) Comment

For Batıçim, the vast majority of Tier 1 suppliers are raw material and energy providers (such as coal, petcoke, clinker, aggregates, and chemical additives). These suppliers operate in highly regulated industries where compliance with environmental legislation (e.g., emission limits, waste management, wastewater discharge permits, and environmental licenses) is legally mandatory. As a result, more than 95% of Tier 1 suppliers by procurement spend are required to comply with such environmental requirements as a condition for maintaining their operating licenses and continuing to supply Batıçim. % Tier 1 suppliers by procurement spend in compliance with this environmental requirement Given that raw material and energy suppliers cannot operate without holding valid permits and meeting regulatory thresholds, Batıçim estimates that over 90% of Tier 1 procurement spend is with suppliers already in compliance. Compliance is monitored through supplier documentation (environmental permits, ISO 14001 certifications), contractual requirements, and, where relevant, audits. In cases of non-compliance or loss of permits, Batıçim's policy is to suspend procurement contracts and seek alternative suppliers to ensure uninterrupted and legally compliant supply.

Climate change

(5.11.6.1) Environmental requirement

Select from:

- ☒ Implementation of emissions reduction initiatives

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

- ☒ Certification
- ☒ Grievance mechanism/ Whistleblowing hotline
- ☒ Supplier scorecard or rating
- ☒ Other, please specify :Batıçim conducts geographical risk mapping of suppliers using external water and climate risk tools such as WWF Water Risk Filter and WRI Aqueduct. This approach allows the company to identify suppliers located in high water-stressed or high-emission

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

Select from:

- ☒ 76-99%

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

Select from:

☒ 76-99%

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

Select from:

☒ 76-99%

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

Select from:

☒ 76-99%

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

Select from:

☒ Suspend and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:

☒ Less than 1%

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply

☒ Developing quantifiable, time-bound targets and milestones to bring suppliers back into compliance

(5.11.6.12) Comment

For Batıçim, the vast majority of Tier 1 suppliers are raw material and energy providers (such as coal, petcoke, clinker, aggregates, and chemical additives). These suppliers operate in highly regulated industries where compliance with environmental legislation (e.g., emission limits, waste management, wastewater discharge permits, and environmental licenses) is legally mandatory. As a result, more than 95% of Tier 1 suppliers by procurement spend are required to comply with such environmental requirements as a condition for maintaining their operating licenses and continuing to supply Batıçim. % Tier 1 suppliers by procurement spend in

compliance with this environmental requirement Given that raw material and energy suppliers cannot operate without holding valid permits and meeting regulatory thresholds, Batiçim estimates that over 90% of Tier 1 procurement spend is with suppliers already in compliance. Compliance is monitored through supplier documentation (environmental permits, ISO 14001 certifications), contractual requirements, and, where relevant, audits. In cases of non-compliance or loss of permits, Batiçim's policy is to suspend procurement contracts and seek alternative suppliers to ensure uninterrupted and legally compliant supply.

Climate change

(5.11.6.1) Environmental requirement

Select from:

☒ Measuring product-level emissions

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

☒ Certification

☒ Grievance mechanism/ Whistleblowing hotline

☒ Supplier scorecard or rating

☒ Other, please specify :Batiçim conducts geographical risk mapping of suppliers using external water and climate risk tools such as WWF Water Risk Filter and WRI Aqueduct. This approach allows the company to identify suppliers located in high water-stressed or high-emission

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

Select from:

☒ 76-99%

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

Select from:

☒ 76-99%

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

Select from:

☒ 76-99%

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

Select from:

☒ 76-99%

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

Select from:

☒ Suspend and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:

☒ Less than 1%

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply

☒ Developing quantifiable, time-bound targets and milestones to bring suppliers back into compliance

(5.11.6.12) Comment

For Batıçim, the vast majority of Tier 1 suppliers are raw material and energy providers (such as coal, petcoke, clinker, aggregates, and chemical additives). These suppliers operate in highly regulated industries where compliance with environmental legislation (e.g., emission limits, waste management, wastewater discharge permits, and environmental licenses) is legally mandatory. As a result, more than 95% of Tier 1 suppliers by procurement spend are required to comply with such environmental requirements as a condition for maintaining their operating licenses and continuing to supply Batıçim. % Tier 1 suppliers by procurement spend in compliance with this environmental requirement Given that raw material and energy suppliers cannot operate without holding valid permits and meeting regulatory thresholds, Batıçim estimates that over 90% of Tier 1 procurement spend is with suppliers already in compliance. Compliance is monitored through supplier documentation (environmental permits, ISO 14001 certifications), contractual requirements, and, where relevant, audits. In cases of non-compliance or loss of permits, Batıçim's policy is to suspend procurement contracts and seek alternative suppliers to ensure uninterrupted and legally compliant supply.

Water

(5.11.6.1) Environmental requirement

Select from:

- ☒ Total water withdrawal volumes reduction

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

- ☒ Grievance mechanism/ Whistleblowing hotline
- ☒ Supplier scorecard or rating
- ☒ Other, please specify :Baticim has also given a grievance mechanism

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

Select from:

- ☒ 76-99%

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

Select from:

- ☒ 76-99%

(5.11.6.5) % tier 1 suppliers with substantive environmental dependencies and/or impacts related to this environmental issue required to comply with this environmental requirement

Select from:

- ☒ 76-99%

(5.11.6.6) % tier 1 suppliers with substantive environmental dependencies and/or impacts related to this environmental issue that are in compliance with this environmental requirement

Select from:

- ☒ 76-99%

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

Select from:

☒ Suspend and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:

☒ Less than 1%

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply

☒ Providing information on appropriate actions that can be taken to address non-compliance

(5.11.6.12) Comment

Batiçim has made water stewardship a strategic priority, given that its operations are located in regions with high to extremely high water stress (Aegean region). In line with Türkiye's Water Efficiency Regulation and our TSRS-aligned Sustainability Report, we have set targets to reduce total freshwater withdrawal by optimizing monitoring and usage efficiency. Between 2023 and 2024, water withdrawal per ton of cement decreased by 0.1% at Batiçim, while it increased by 23% at Batisöke. At Batiçim, the improvement was mainly achieved through modernization of cooling systems and the installation of digital water meters, which allow real-time tracking of consumption and identification of losses. Looking forward, Batiçim aims to achieve further reductions by expanding digital metering infrastructure and actively monitoring leaks and unnecessary consumption. Specific measures include replacing field irrigation with mechanical sweeping equipment, thus preventing water use in non-essential areas. Unlike previous drafts, no greywater recovery or reuse facilities are currently planned; instead, efficiency gains will be realized through better monitoring and operational practices. Suppliers are also required to adopt similar measures, particularly in aggregates and chemical inputs where water use is significant. Through our Supplier Audit Program, we verify compliance annually, ensuring that both Batiçim and its supply chain contribute to national and international water efficiency

[Add row]

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

Climate change

(5.11.7.2) Action driven by supplier engagement

Select from:

- ☒ Adaptation to climate change

(5.11.7.3) Type and details of engagement

Capacity building

- ☒ Develop or distribute resources on how to map upstream value chain
- ☒ Provide training, support and best practices on how to make credible renewable energy usage claims
- ☒ Provide training, support and best practices on how to measure GHG emissions
- ☒ Provide training, support and best practices on how to mitigate environmental impact
- ☒ Support suppliers to set their own environmental commitments across their operations

Financial incentives

- ☒ Include long-term contracts linked to environmental commitments

Information collection

- ☒ Collect environmental risk and opportunity information at least annually from suppliers
- ☒ Collect GHG emissions data at least annually from suppliers
- ☒ Collect targets information at least annually from suppliers
- ☒ Collect water quality information at least annually from suppliers (e.g., discharge quality, pollution incidents, hazardous substances)
- ☒ Collect water quantity information at least annually from suppliers (e.g., withdrawal and discharge volumes)

Innovation and collaboration

- ☒ Collaborate with suppliers on innovations to reduce environmental impacts in products and services
- ☒ Collaborate with suppliers to develop reuse infrastructure and reuse models

(5.11.7.4) Upstream value chain coverage

Select all that apply

- ☒ Tier 1 suppliers
- ☒ Tier 2 suppliers

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

Select from:

☒ 76-99%

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

Select from:

☒ 51-75%

(5.11.7.8) Number of tier 2+ suppliers engaged

100

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

Batiçim's supply chain management approach places strong emphasis on environmental requirements, which are considered a fundamental element of its sustainability strategy. In particular, Tier 1 suppliers with the highest environmental impact potential (such as those providing coal, petcoke, clinker, aggregates, and chemical additives) are required to comply with strict environmental criteria. This is aligned with the company's own emission reduction and water management targets as well as the methodology outlined in TSRS reporting. Batiçim pays special attention to suppliers operating in high or extremely high water-stressed regions, as identified by WWF and WRI Aqueduct data (including the Gediz Basin in Manisa, the Büyük Menderes Basin in Aydın and Denizli, and Yatağan in Muğla). Suppliers located in these regions are expected to implement water management systems compliant with national regulations and international best practices, as well as adopt measures to improve water efficiency. For energy and mining sector suppliers, reporting on water usage and setting reduction plans are considered essential requirements. In line with Batiçim's Scope 1 and 2 reduction commitments, suppliers are also expected to share responsibility in addressing climate change. High energy-consuming and fossil-fuel-based suppliers are required to monitor, report, and develop strategies to reduce greenhouse gas emissions. Chemical additive and logistics providers are also expected to contribute by reporting on indirect emissions (Scope 3) and ensuring transparency in their environmental performance. Holding internationally recognized certifications, such as ISO 14001 Environmental Management System, is a baseline requirement for large Tier 1 suppliers. Such certifications demonstrate that suppliers manage their environmental impacts systematically and commit to continuous improvement. In addition, suppliers may undergo third-party audits, and their performance is regularly tracked through Batiçim's supplier scorecards. For suppliers not complying with environmental requirements, Batiçim first prioritizes cooperation and corrective action. Non-compliant suppliers are asked to prepare short-term action plans. If improvements are not achieved, more extensive third-party audits are carried out.

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

Select from:

☒ Yes, please specify the environmental requirement :Batiçim requires its Tier 1 suppliers to comply with environmental standards aligned with national legislation and international frameworks, particularly on water management, GHG emissions,

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

Select from:

☒ Yes

Water

(5.11.7.2) Action driven by supplier engagement

Select from:

☒ Total water withdrawal volumes reduction

(5.11.7.3) Type and details of engagement

Capacity building

- ☒ Develop or distribute resources on how to map upstream value chain
- ☒ Provide training, support and best practices on how to make credible renewable energy usage claims
- ☒ Provide training, support and best practices on how to measure GHG emissions
- ☒ Support suppliers to develop public time-bound action plans with clear milestones
- ☒ Support suppliers to set their own environmental commitments across their operations

Financial incentives

- ☒ Include long-term contracts linked to environmental commitments

Information collection

- ☒ Collect environmental risk and opportunity information at least annually from suppliers
- ☒ Collect GHG emissions data at least annually from suppliers
- ☒ Collect targets information at least annually from suppliers
- ☒ Collect water quantity information at least annually from suppliers (e.g., withdrawal and discharge volumes)

Innovation and collaboration

- ☒ Collaborate with suppliers on innovations to reduce environmental impacts in products and services
- ☒ Collaborate with suppliers on innovative business models and corporate renewable energy sourcing mechanisms
- ☒ Collaborate with suppliers to develop reuse infrastructure and reuse models

(5.11.7.4) Upstream value chain coverage

Select all that apply

- ☒ Tier 1 suppliers
- ☒ Tier 2 suppliers

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

Select from:

- ☒ 76-99%

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

Select from:

- ☒ 76-99%

(5.11.7.8) Number of tier 2+ suppliers engaged

100

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

Batiçim's supply chain management approach places strong emphasis on environmental requirements, which are considered a fundamental element of its sustainability strategy. In particular, Tier 1 suppliers with the highest environmental impact potential (such as those providing coal, petcoke, clinker, aggregates, and chemical additives) are required to comply with strict environmental criteria. This is aligned with the company's own emission reduction and water management targets as well as the methodology outlined in TSRS reporting. Batiçim pays special attention to suppliers operating in high or extremely high water-stressed regions, as identified by WWF and WRI Aqueduct data (including the Gediz Basin in Manisa, the Büyük Menderes Basin in Aydın and Denizli, and Yatağan in Muğla). Suppliers located in these regions are expected to implement water management systems compliant with national regulations and international best practices, as well

as adopt measures to improve water efficiency. For energy and mining sector suppliers, reporting on water usage and setting reduction plans are considered essential requirements. In line with Batıçim's Scope 1 and 2 reduction commitments, suppliers are also expected to share responsibility in addressing climate change. High energy-consuming and fossil-fuel-based suppliers are required to monitor, report, and develop strategies to reduce greenhouse gas emissions. Holding internationally recognized certifications, such as ISO 14001 Environmental Management System, is a baseline requirement for large Tier 1 suppliers. Such certifications demonstrate that suppliers manage their environmental impacts systematically and commit to continuous improvement. In addition, suppliers may undergo third-party audits, and their performance is regularly tracked through Batıçim's supplier scorecards. For suppliers not complying with environmental requirements, Batıçim first prioritizes cooperation and corrective action. Non-compliant suppliers are asked to prepare short-term action plans. If improvements are not achieved, more extensive third-party audits are carried out.

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

Select from:

☒ Yes, please specify the environmental requirement :Batıçim requires its Tier 1 suppliers to comply with environmental standards aligned with national legislation and international frameworks, particularly on water management, GHG emissions, and certified environmental management systems. Suppliers in

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

Select from:

☒ Yes

Climate change

(5.11.7.2) Action driven by supplier engagement

Select from:

☒ Carbon removals

(5.11.7.3) Type and details of engagement

Capacity building

- ☒ Develop or distribute resources on how to map upstream value chain
- ☒ Provide training, support and best practices on how to make credible renewable energy usage claims
- ☒ Provide training, support and best practices on how to measure GHG emissions
- ☒ Provide training, support and best practices on how to mitigate environmental impact

- ☒ Support suppliers to set their own environmental commitments across their operations

Financial incentives

- ☒ Include long-term contracts linked to environmental commitments

Information collection

- ☒ Collect environmental risk and opportunity information at least annually from suppliers
- ☒ Collect GHG emissions data at least annually from suppliers
- ☒ Collect targets information at least annually from suppliers

Innovation and collaboration

- ☒ Collaborate with suppliers on innovations to reduce environmental impacts in products and services
- ☒ Encourage suppliers to take Beyond Value Chain Mitigation (BVCM) actions

(5.11.7.4) Upstream value chain coverage

Select all that apply

- ☒ Tier 1 suppliers
- ☒ Tier 2 suppliers

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

Select from:

- ☒ 76-99%

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

Select from:

- ☒ 51-75%

(5.11.7.8) Number of tier 2+ suppliers engaged

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

Batiçim's supply chain management approach places strong emphasis on environmental requirements, which are considered a fundamental element of its sustainability strategy. In particular, Tier 1 suppliers with the highest environmental impact potential (such as those providing coal, petcoke, clinker, aggregates, and chemical additives) are required to comply with strict environmental criteria. This is aligned with the company's own emission reduction and water management targets as well as the methodology outlined in TSRS reporting. Batiçim pays special attention to suppliers operating in high or extremely high water-stressed regions, as identified by WWF and WRI Aqueduct data (including the Gediz Basin in Manisa, the Büyük Menderes Basin in Aydın and Denizli, and Yatağan in Muğla). Suppliers located in these regions are expected to implement water management systems compliant with national regulations and international best practices, as well as adopt measures to improve water efficiency. For energy and mining sector suppliers, reporting on water usage and setting reduction plans are considered essential requirements. In line with Batiçim's Scope 1 and 2 reduction commitments, suppliers are also expected to share responsibility in addressing climate change. High energy-consuming and fossil-fuel-based suppliers are required to monitor, report, and develop strategies to reduce greenhouse gas emissions. Holding internationally recognized certifications, such as ISO 14001 Environmental Management System, is a baseline requirement for large Tier 1 suppliers. Such certifications demonstrate that suppliers manage their environmental impacts systematically and commit to continuous improvement. In addition, suppliers may undergo third-party audits, and their performance is regularly tracked through Batiçim's supplier scorecards. For suppliers not complying with environmental requirements, Batiçim first prioritizes cooperation and corrective action. Non-compliant suppliers are asked to prepare short-term action plans. If improvements are not achieved, more extensive third-party audits are carried out.

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

Select from:

☒ Yes, please specify the environmental requirement :Batiçim requires its Tier 1 suppliers to comply with environmental standards aligned with national legislation and international frameworks, particularly on water management, GHG emissions, and certified environmental management systems.

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

Select from:

☒ Yes

Water

(5.11.7.2) Action driven by supplier engagement

Select from:

☒ Waste and resource reduction and improved end-of-life management

(5.11.7.3) Type and details of engagement

Financial incentives

- ☒ Feature environmental performance in supplier awards scheme
- ☒ Include long-term contracts linked to environmental commitments

Information collection

- ☒ Collect environmental risk and opportunity information at least annually from suppliers
- ☒ Collect water quality information at least annually from suppliers (e.g., discharge quality, pollution incidents, hazardous substances)
- ☒ Collect water quantity information at least annually from suppliers (e.g., withdrawal and discharge volumes)

Innovation and collaboration

- ☒ Run a campaign to encourage innovation to reduce environmental impacts on products and services

(5.11.7.4) Upstream value chain coverage

Select all that apply

- ☒ Tier 1 suppliers
- ☒ Tier 2 suppliers

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

Select from:

- ☒ 76-99%

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

Select from:

- ☒ 76-99%

(5.11.7.8) Number of tier 2+ suppliers engaged

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

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

Select from:

☒ Yes, please specify the environmental requirement :Batiçim requires its Tier 1 suppliers to comply with environmental standards aligned with national legislation and international frameworks, particularly on water management, GHG emissions, and certified environmental management systems.

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

Select from:

☒ Yes

Water

(5.11.7.2) Action driven by supplier engagement

Select from:

- ☒ Substitution of hazardous substances with less harmful substances

(5.11.7.3) Type and details of engagement

Capacity building

- ☒ Develop or distribute resources on how to map upstream value chain
- ☒ Provide training, support and best practices on how to mitigate environmental impact
- ☒ Support suppliers to develop public time-bound action plans with clear milestones
- ☒ Support suppliers to set their own environmental commitments across their operations

Financial incentives

- ☒ Feature environmental performance in supplier awards scheme
- ☒ Include long-term contracts linked to environmental commitments

Information collection

- ☒ Collect environmental risk and opportunity information at least annually from suppliers
- ☒ Collect water quality information at least annually from suppliers (e.g., discharge quality, pollution incidents, hazardous substances)
- ☒ Collect water quantity information at least annually from suppliers (e.g., withdrawal and discharge volumes)

(5.11.7.4) Upstream value chain coverage

Select all that apply

- ☒ Tier 1 suppliers
- ☒ Tier 2 suppliers

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

Select from:

- ☒ 76-99%

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

Select from:

☒ 76-99%

(5.11.7.8) Number of tier 2+ suppliers engaged

100

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

Batiçim's supply chain management approach places strong emphasis on environmental requirements, which are considered a fundamental element of its sustainability strategy. In particular, Tier 1 suppliers with the highest environmental impact potential (such as those providing coal, petcoke, clinker, aggregates, and chemical additives) are required to comply with strict environmental criteria. This is aligned with the company's own emission reduction and water management targets as well as the methodology outlined in TSRS reporting. Batiçim pays special attention to suppliers operating in high or extremely high water-stressed regions, as identified by WWF and WRI Aqueduct data (including the Gediz Basin in Manisa, the Büyük Menderes Basin in Aydın and Denizli, and Yatağan in Muğla). Suppliers located in these regions are expected to implement water management systems compliant with national regulations and international best practices, as well as adopt measures to improve water efficiency. For energy and mining sector suppliers, reporting on water usage and setting reduction plans are considered essential requirements. In line with Batiçim's Scope 1 and 2 reduction commitments, suppliers are also expected to share responsibility in addressing climate change. High energy-consuming and fossil-fuel-based suppliers are required to monitor, report, and develop strategies to reduce greenhouse gas emissions. Holding internationally recognized certifications, such as ISO 14001 Environmental Management System, is a baseline requirement for large Tier 1 suppliers. Such certifications demonstrate that suppliers manage their environmental impacts systematically and commit to continuous improvement. In addition, suppliers may undergo third-party audits, and their performance is regularly tracked through Batiçim's supplier scorecards. For suppliers not complying with environmental requirements, Batiçim first prioritizes cooperation and corrective action. Non-compliant suppliers are asked to prepare short-term action plans. If improvements are not achieved, more extensive third-party audits are carried out.

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

Select from:

☒ Yes, please specify the environmental requirement :Batiçim requires its Tier 1 suppliers to comply with environmental standards aligned with national legislation and international frameworks, particularly on water management, GHG emissions, and certified environmental management systems. Suppliers in

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

Select from:

☒ Yes

Water

(5.11.7.2) Action driven by supplier engagement

Select from:

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

(5.11.7.3) Type and details of engagement

Capacity building

- ☒ Develop or distribute resources on how to map upstream value chain
- ☒ Provide training, support and best practices on how to mitigate environmental impact
- ☒ Support suppliers to set their own environmental commitments across their operations

Financial incentives

- ☒ Feature environmental performance in supplier awards scheme
- ☒ Provide financial incentives to encourage progress against water pollution targets
- ☒ Provide financial incentives to encourage progress against water withdrawal targets
- ☒ Include long-term contracts linked to environmental commitments

Information collection

- ☒ Collect environmental risk and opportunity information at least annually from suppliers
- ☒ Collect water quality information at least annually from suppliers (e.g., discharge quality, pollution incidents, hazardous substances)
- ☒ Collect water quantity information at least annually from suppliers (e.g., withdrawal and discharge volumes)

Innovation and collaboration

- ☒ Engage with suppliers to advocate for policy or regulatory change to address environmental challenges
- ☒ Run a campaign to encourage innovation to reduce environmental impacts on products and services

(5.11.7.4) Upstream value chain coverage

Select all that apply

- ☒ Tier 1 suppliers
- ☒ Tier 2 suppliers

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

Select from:

- ☒ 76-99%

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

Select from:

- ☒ 76-99%

(5.11.7.8) Number of tier 2+ suppliers engaged

100

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

Batiçim's supply chain management approach places strong emphasis on environmental requirements, which are considered a fundamental element of its sustainability strategy. In particular, Tier 1 suppliers with the highest environmental impact potential (such as those providing coal, petcoke, clinker, aggregates, and chemical additives) are required to comply with strict environmental criteria. This is aligned with the company's own emission reduction and water management targets as well as the methodology outlined in TSRS reporting. Batiçim pays special attention to suppliers operating in high or extremely high water-stressed regions, as identified by WWF and WRI Aqueduct data (including the Gediz Basin in Manisa, the Büyük Menderes Basin in Aydın and Denizli, and Yatağan in Muğla). Suppliers located in these regions are expected to implement water management systems compliant with national regulations and international best practices, as well as adopt measures to improve water efficiency. For energy and mining sector suppliers, reporting on water usage and setting reduction plans are considered essential requirements. In line with Batiçim's Scope 1 and 2 reduction commitments, suppliers are also expected to share responsibility in addressing climate change. High energy-consuming and fossil-fuel-based suppliers are required to monitor, report, and develop strategies to reduce greenhouse gas emissions. Chemical additive and logistics providers are also expected to contribute by reporting on indirect emissions (Scope 3) and ensuring transparency in their environmental performance. Holding internationally recognized certifications, such as ISO 14001 Environmental Management System, is a baseline requirement for large Tier 1 suppliers. Such certifications demonstrate that suppliers manage their environmental impacts systematically and commit to continuous improvement. In addition, suppliers may undergo third-party audits, and their performance is regularly tracked through Batiçim's supplier scorecards. For suppliers not complying with

environmental requirements, Batıçim first prioritizes cooperation and corrective action. Non-compliant suppliers are asked to prepare short-term action plans. If improvements are not achieved, more extensive third-party audits are carried out.

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

Select from:

☒ Yes, please specify the environmental requirement :Batıçim requires its Tier 1 suppliers to comply with environmental standards aligned with national legislation and international frameworks, particularly on water management, GHG emissions, and certified environmental management systems. Suppliers in

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

Select from:

☒ Yes

Water

(5.11.7.2) Action driven by supplier engagement

Select from:

☒ Upstream value chain transparency and human rights

(5.11.7.3) Type and details of engagement

Capacity building

- ☒ Provide training, support and best practices on how to make credible renewable energy usage claims
- ☒ Provide training, support and best practices on how to mitigate environmental impact
- ☒ Support suppliers to set their own environmental commitments across their operations

Financial incentives

- ☒ Feature environmental performance in supplier awards scheme
- ☒ Provide financial incentives to encourage progress against water pollution targets
- ☒ Provide financial incentives to encourage progress against water withdrawal targets

Information collection

- ☒ Collect environmental risk and opportunity information at least annually from suppliers
- ☒ Collect water quality information at least annually from suppliers (e.g., discharge quality, pollution incidents, hazardous substances)
- ☒ Collect water quantity information at least annually from suppliers (e.g., withdrawal and discharge volumes)

Innovation and collaboration

- ☒ Run a campaign to encourage innovation to reduce environmental impacts on products and services

(5.11.7.4) Upstream value chain coverage

Select all that apply

- ☒ Tier 1 suppliers
- ☒ Tier 2 suppliers

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

Select from:

- ☒ 76-99%

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

Select from:

- ☒ 76-99%

(5.11.7.8) Number of tier 2+ suppliers engaged

100

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

Batiçim's supply chain management approach places strong emphasis on environmental requirements, which are considered a fundamental element of its sustainability strategy. In particular, Tier 1 suppliers with the highest environmental impact potential (such as those providing coal, petcoke, clinker, aggregates, and chemical additives) are required to comply with strict environmental criteria. This is aligned with the company's own emission reduction and water management

targets as well as the methodology outlined in TSRS reporting. Batıçım pays special attention to suppliers operating in high or extremely high water-stressed regions, as identified by WWF and WRI Aqueduct data (including the Gediz Basin in Manisa, the Büyük Menderes Basin in Aydın and Denizli, and Yatağan in Muğla). Suppliers located in these regions are expected to implement water management systems compliant with national regulations and international best practices, as well as adopt measures to improve water efficiency. For energy and mining sector suppliers, reporting on water usage and setting reduction plans are considered essential requirements. In line with Batıçım's Scope 1 and 2 reduction commitments, suppliers are also expected to share responsibility in addressing climate change. High energy-consuming and fossil-fuel-based suppliers are required to monitor, report, and develop strategies to reduce greenhouse gas emissions. Holding internationally recognized certifications, such as ISO 14001 Environmental Management System, is a baseline requirement for large Tier 1 suppliers. Such certifications demonstrate that suppliers manage their environmental impacts systematically and commit to continuous improvement. In addition, suppliers may undergo third-party audits, and their performance is regularly tracked through Batıçım's supplier scorecards. For suppliers not complying with environmental requirements, Batıçım first prioritizes cooperation and corrective action. Non-compliant suppliers are asked to prepare short-term action plans. If improvements are not achieved, more extensive third-party audits are carried out.

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

Select from:

☒ Yes, please specify the environmental requirement :Batıçım requires its Tier 1 suppliers to comply with environmental standards aligned with national legislation and international frameworks, particularly on water management, GHG emissions, and certified environmental management systems. Suppliers in

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

Select from:

☒ Yes

[Add row]

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

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☒ Customers

(5.11.9.2) Type and details of engagement

Education/Information sharing

- ☒ Educate and work with stakeholders on understanding and measuring exposure to environmental risks
- ☒ Run an engagement campaign to educate stakeholders about the environmental impacts about your products, goods and/or services
- ☒ Share information about your products and relevant certification schemes
- ☒ Share information on environmental initiatives, progress and achievements

(5.11.9.3) % of stakeholder type engaged

Select from:

- ☒ 100%

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

- ☒ 100%

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

Batıçım places significant emphasis on stakeholder engagement, particularly with customers and local communities, to strengthen sustainability performance and long-term value creation. Customer satisfaction is monitored regularly, with 2024 evaluations showing an overall satisfaction rate of 94.12% across categories such as general image, products and services, and after-sales support. Feedback is systematically gathered and used to improve service quality and adapt to changing expectations. Beyond customers, Batıçım engages a wide set of stakeholders — employees, contractors, visitors, and local communities — through its Community Health and Safety Plan, designed to minimize health and safety impacts. This plan is built on human rights principles and supported by risk analyses, site inspections, emergency planning, and awareness training. Regular information sessions and reporting processes ensure transparency and help reduce potential risks. Stakeholder engagement is guided by three principles: Importance of Stakeholders: evaluating the impact of stakeholders on operations, strategic targets, and sustainability performance. Key Issues for Stakeholders: analyzing expectations, priorities, and critical areas related to business processes. Participation Methods: ensuring continuous dialogue through workshops, surveys, one-to-one meetings, and reporting. Through this structured engagement, Batıçım aligns operational goals with stakeholder expectations, enhances trust, and strengthens its ability to respond to both market demands and societal needs. This approach ensures that sustainability actions, such as decarbonization and resource efficiency, are supported by strong and ongoing collaboration with external and internal stakeholders.

(5.11.9.6) Effect of engagement and measures of success

Batıçım's structured stakeholder engagement has had a direct impact on strengthening customer trust, improving service quality, and aligning operations with sustainability priorities. Regular customer satisfaction surveys revealed an overall satisfaction rate of 94.12%, with particularly high scores in after-sales support (95.29%). This reflects the company's ability to adapt its products, services, and communication to stakeholder needs. At the same time, community engagement

through the Community Health and Safety Plan has reduced potential health and safety risks, creating a safer environment for employees, contractors, visitors, and local communities. Success is measured through quantitative and qualitative indicators. Customer satisfaction scores serve as a key benchmark, with a target of maintaining rates above 90% across all categories. Stakeholder engagement effectiveness is monitored via regular reporting, feedback sessions, and independent evaluations of risk management and safety performance. In sustainability terms, success also includes progress in reducing carbon intensity through product portfolio transformation, increasing the share of blended and lower-carbon cement types, and ensuring compliance with environmental and social standards across the supply chain.

Water

(5.11.9.1) Type of stakeholder

Select from:

☒ Investors and shareholders

(5.11.9.2) Type and details of engagement

Education/Information sharing

☒ Share information about your products and relevant certification schemes

☒ Share information on environmental initiatives, progress and achievements

Other

☒ Other, please specify :regular sustainability reporting

(5.11.9.3) % of stakeholder type engaged

Select from:

☒ 100%

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

Batiçim engages with key stakeholders—including customers, suppliers, investors, and local communities—to strengthen resilience against climate and water-related risks and to align with global sustainability standards. The company prioritizes stakeholder engagement to ensure alignment with ESG requirements, national and international legislation, and the UN Global Compact principles. The scope of engagement covers areas such as reducing GHG emissions, improving water management in high-stress regions, advancing circular economy practices, and enhancing transparency through ESG reporting and sustainability indices. Batiçim's

proactive stakeholder dialogue also aims to integrate customer expectations into product innovation (e.g., blended cements with lower carbon intensity), support suppliers in meeting environmental compliance, and maintain investor trust through consistent ESG ratings.

(5.11.9.6) Effect of engagement and measures of success

Engagement has led to measurable outcomes that directly support Batıçim's climate and water strategies. Customer satisfaction levels reached 94%, reflecting effective alignment of sustainability practices with market expectations. On the investor side, Batıçim has been included in the London Stock Exchange Group's Sustainability Index with a B+ rating, and received a "Good Level of Sustainability" (score B) on the Synesgy global platform. These results demonstrate transparency and credibility in ESG performance. Supplier engagement has also enhanced compliance with environmental standards, particularly in water-stressed regions, ensuring risk mitigation in the value chain. Success is measured through key indicators such as ESG scores, stakeholder survey results, supplier compliance rates (76–99% of Tier 1 suppliers), and continuous improvements in sustainability ratings. Going forward, Batıçim aims to further align with international disclosure standards (such as CDP Climate and Water frameworks), increase renewable energy use in operations, and expand supplier engagement programs to accelerate decarbonization and water stewardship.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☒ Investors and shareholders

(5.11.9.2) Type and details of engagement

Education/Information sharing

☒ Share information about your products and relevant certification schemes

☒ Share information on environmental initiatives, progress and achievements

Other

☒ Other, please specify :regular sustainability reporting

(5.11.9.3) % of stakeholder type engaged

Select from:

☒ 100%

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

☒ 100%

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

Batiçim engages with key stakeholders—including customers, suppliers, investors, and local communities—to strengthen resilience against climate and water-related risks and to align with global sustainability standards. The company prioritizes stakeholder engagement to ensure alignment with ESG requirements, national and international legislation, and the UN Global Compact principles. The scope of engagement covers areas such as reducing GHG emissions, improving water management in high-stress regions, advancing circular economy practices, and enhancing transparency through ESG reporting and sustainability indices. Batiçim's proactive stakeholder dialogue also aims to integrate customer expectations into product innovation (e.g., blended cements with lower carbon intensity), support suppliers in meeting environmental compliance, and maintain investor trust through consistent ESG ratings.

(5.11.9.6) Effect of engagement and measures of success

Engagement has led to measurable outcomes that directly support Batiçim's climate and water strategies. Customer satisfaction levels reached 94%, reflecting effective alignment of sustainability practices with market expectations. On the investor side, Batiçim has been included in the London Stock Exchange Group's Sustainability Index with a B+ rating, and received a "Good Level of Sustainability" (score B) on the Synesgy global platform. These results demonstrate transparency and credibility in ESG performance. Supplier engagement has also enhanced compliance with environmental standards, particularly in water-stressed regions, ensuring risk mitigation in the value chain. Success is measured through key indicators such as ESG scores, stakeholder survey results, supplier compliance rates (76–99% of Tier 1 suppliers), and continuous improvements in sustainability ratings. Going forward, Batiçim aims to further align with international disclosure standards (such as CDP Climate and Water frameworks), increase renewable energy use in operations, and expand supplier engagement programs to accelerate decarbonization and water stewardship.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☒ Other value chain stakeholder, please specify :suppliers

(5.11.9.2) Type and details of engagement

Education/Information sharing

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

- ☒ Run an engagement campaign to educate stakeholders about the environmental impacts about your products, goods and/or services
- ☒ Share information about your products and relevant certification schemes
- ☒ Share information on environmental initiatives, progress and achievements

Innovation and collaboration

- ☒ Align your organization's goals to support customers' targets and ambitions
- ☒ Collaborate with stakeholders in creation and review of your climate transition plan
- ☒ Collaborate with stakeholders on innovations to reduce environmental impacts in products and services
- ☒ Engage with stakeholders to advocate for policy or regulatory change
- ☒ Run a campaign to encourage innovation to reduce environmental impacts

(5.11.9.3) % of stakeholder type engaged

Select from:

- ☒ 100%

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

- ☒ 100%

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

Batiçim prioritizes engagement with its suppliers as they represent a critical part of the value chain in both environmental impact and risk management. Engagement ensures that suppliers comply with environmental requirements aligned with national legislation, international frameworks, and the UN Global Compact. Batiçim organizes supplier days, conducts regular audits and performance evaluations, and supports capacity building to raise awareness of climate and water risks. The scope includes ensuring responsible sourcing of raw materials, monitoring suppliers in water-stressed regions, and verifying compliance with sustainability standards for energy, chemical additives, and logistics partners. Suppliers representing more than 20% of critical categories are classified as high-priority for engagement.

(5.11.9.6) Effect of engagement and measures of success

Engagement with suppliers has resulted in improved transparency and stronger compliance with environmental requirements across the supply chain. According to Batiçim's reports, 76–99% of Tier 1 suppliers are already assessed, and corrective actions are implemented where gaps are identified. Supplier audits have confirmed adherence to environmental standards, while supplier days have enhanced collaboration and awareness on sustainability issues. Success is measured

through supplier compliance rates, ESG performance scores, and the reduction of risks in high water-stress regions. Continuous improvement programs ensure that suppliers not only meet minimum legal standards but also progress towards best practices in areas such as waste management, energy efficiency, and water stewardship. Going forward, Batıçim aims to integrate digital monitoring systems and expand supplier scorecards to achieve broader engagement and alignment with international disclosure frameworks such as CDP Climate and Water.

Water

(5.11.9.1) Type of stakeholder

Select from:

- ☒ Other value chain stakeholder, please specify :suppliers

(5.11.9.2) Type and details of engagement

Education/Information sharing

- ☒ Educate and work with stakeholders on understanding and measuring exposure to environmental risks
- ☒ Run an engagement campaign to educate stakeholders about the environmental impacts about your products, goods and/or services
- ☒ Share information about your products and relevant certification schemes
- ☒ Share information on environmental initiatives, progress and achievements

Innovation and collaboration

- ☒ Align your organization's goals to support customers' targets and ambitions
- ☒ Collaborate with stakeholders on innovations to reduce environmental impacts in products and services
- ☒ Encourage collaborative work in multi-stakeholder landscape towards initiatives for sustainable land-use goals

(5.11.9.3) % of stakeholder type engaged

Select from:

- ☒ 100%

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

Batıçim prioritizes engagement with its suppliers as they represent a critical part of the value chain in both environmental impact and risk management. Engagement ensures that suppliers comply with environmental requirements aligned with national legislation, international frameworks, and the UN Global Compact. Batıçim

organizes supplier days, conducts regular audits and performance evaluations, and supports capacity building to raise awareness of climate and water risks. The scope includes ensuring responsible sourcing of raw materials, monitoring suppliers in water-stressed regions, and verifying compliance with sustainability standards for energy, chemical additives, and logistics partners. Suppliers representing more than 20% of critical categories are classified as high-priority for engagement.

(5.11.9.6) Effect of engagement and measures of success

Engagement with suppliers has resulted in improved transparency and stronger compliance with environmental requirements across the supply chain. According to Batiçim's reports, 76–99% of Tier 1 suppliers are already assessed, and corrective actions are implemented where gaps are identified. Supplier audits have confirmed adherence to environmental standards, while supplier days have enhanced collaboration and awareness on sustainability issues. Success is measured through supplier compliance rates, ESG performance scores, and the reduction of risks in high water-stress regions. Continuous improvement programs ensure that suppliers not only meet minimum legal standards but also progress towards best practices in areas such as waste management, energy efficiency, and water stewardship. Going forward, Batiçim aims to integrate digital monitoring systems and expand supplier scorecards to achieve broader engagement and alignment with international disclosure frameworks such as CDP Climate and Water.

Water

(5.11.9.1) Type of stakeholder

Select from:

☒ Customers

(5.11.9.2) Type and details of engagement

Education/Information sharing

- ☒ Run an engagement campaign to educate stakeholders about the environmental impacts about your products, goods and/or services
- ☒ Share information about your products and relevant certification schemes
- ☒ Share information on environmental initiatives, progress and achievements

(5.11.9.3) % of stakeholder type engaged

Select from:

☒ 100%

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

Batiçim places significant emphasis on stakeholder engagement, particularly with customers and local communities, to strengthen sustainability performance and long-term value creation. Customer satisfaction is monitored regularly, with 2023 evaluations showing an overall satisfaction rate of 94.12% across categories such as general image, products and services, and after-sales support. Feedback is systematically gathered and used to improve service quality and adapt to changing expectations. Beyond customers, Batiçim engages a wide set of stakeholders — employees, contractors, visitors, and local communities — through its Community Health and Safety Plan, designed to minimize health and safety impacts. This plan is built on human rights principles and supported by risk analyses, site inspections, emergency planning, and awareness training. Regular information sessions and reporting processes ensure transparency and help reduce potential risks. Stakeholder engagement is guided by three principles: Importance of Stakeholders: evaluating the impact of stakeholders on operations, strategic targets, and sustainability performance. Key Issues for Stakeholders: analyzing expectations, priorities, and critical areas related to business processes. Participation Methods: ensuring continuous dialogue through workshops, surveys, one-to-one meetings, and reporting. Through this structured engagement, Batiçim aligns operational goals with stakeholder expectations, enhances trust, and strengthens its ability to respond to both market demands and societal needs. This approach ensures that sustainability actions, such as decarbonization and resource efficiency, are supported by strong and ongoing collaboration with external and internal stakeholders.

(5.11.9.6) Effect of engagement and measures of success

Batiçim’s structured stakeholder engagement has had a direct impact on strengthening customer trust, improving service quality, and aligning operations with sustainability priorities. Regular customer satisfaction surveys revealed an overall satisfaction rate of 94.12%, with particularly high scores in after-sales support (95.29%). This reflects the company’s ability to adapt its products, services, and communication to stakeholder needs. At the same time, community engagement through the Community Health and Safety Plan has reduced potential health and safety risks, creating a safer environment for employees, contractors, visitors, and local communities. Success is measured through quantitative and qualitative indicators. Customer satisfaction scores serve as a key benchmark, with a target of maintaining rates above 90% across all categories. Stakeholder engagement effectiveness is monitored via regular reporting, feedback sessions, and independent evaluations of risk management and safety performance. In sustainability terms, success also includes progress in reducing carbon intensity through product portfolio transformation, increasing the share of blended and lower-carbon cement types, and ensuring compliance with environmental and social standards across the supply chain

[Add row]

C6. Environmental Performance - Consolidation Approach

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

Climate change

(6.1.1) Consolidation approach used

Select from:

☒ Financial control

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

We apply the financial-control approach, which is also the method required under TSRS 2 Climate-related Disclosures. The reporting boundary is identical to Batıçım's consolidated financial statements and covers the parent and all subsidiaries over which we have direct or indirect control for the full reporting period (1 Jan–31 Dec 2024). Included entities are: Batisöke Söke Çimento (74.62%), Batıbeton (100%), Batıliman (90%), Batıçım Enerji (100%) and ASH Plus (100%). For controlled entities we report 100% of environmental impacts (Scopes 1–2 and water) irrespective of minority interest. Operationally, this boundary spans our 2 cement plants, 22 ready-mix concrete plants, 1 port and 2 hydro power plants, ensuring that production, logistics and energy assets under our financial control are consistently covered. By applying both financial and operational control perspectives, we confirm the completeness and accuracy of reported values across all included entities.

Water

(6.1.1) Consolidation approach used

Select from:

☒ Financial control

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

We apply the financial-control approach, which is also the method required under TSRS 2 Climate-related Disclosures. The reporting boundary is identical to Batıçım's consolidated financial statements and covers the parent and all subsidiaries over which we have direct or indirect control for the full reporting period (1 Jan–31 Dec 2024). Included entities are: Batisöke Söke Çimento (74.62%), Batıbeton (100%), Batıliman (90%), Batıçım Enerji (100%) and ASH Plus (100%). For controlled entities we report 100% of environmental impacts (Scopes 1–2 and water) irrespective of minority interest; associates/JVs and suppliers are also

addressed through Scope 3. Operationally, this boundary spans our 2 cement plants, 22 ready-mix concrete plants, 1 port and 2 hydro power plants, ensuring that production, logistics and energy assets under our financial control are consistently covered. By applying both financial and operational control perspectives, we confirm the completeness and accuracy of reported values across all included entities.

[Fixed row]

C7. Environmental performance - Climate Change

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

Select from:

☒ Yes

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

Select all that apply

☒ ISO 14064-1

☒ IEA CO2 Emissions from Fuel Combustion

☒ The Greenhouse Gas Protocol: Scope 2 Guidance

☒ The Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Standard

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

☒ Defra Environmental Reporting Guidelines: Including streamlined energy and carbon reporting guidance, 2019

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

(7.3.1) Scope 2, location-based

Select from:

☒ We are reporting a Scope 2, location-based figure

(7.3.2) Scope 2, market-based

Select from:

☒ We are reporting a Scope 2, market-based figure

(7.3.3) Comment

Batiçim quantifies Scope 2 emissions using both the location-based and market-based approaches, in line with TSRS requirements. Under the location-based method, electricity consumption recorded on supplier invoices is multiplied by the national grid emission factor published by TEİAŞ (0.442 tCO₂e/MWh). Under the market-based method, emissions are adjusted by deducting the impact of purchased renewable energy certificates (YEK-G). This dual reporting approach ensures transparent disclosure of indirect electricity-related emissions. Also, CDP reporting will begin in 2025, and net-zero targets will be set under SBTi (Science Based Targets initiative). These steps reinforce our Scope 2 management with forward-looking commitments.

[Fixed row]

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

Select from:

☒ No

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

Scope 1

(7.5.1) Base year end

12/30/2022

(7.5.2) Base year emissions (metric tons CO₂e)

3354684

(7.5.3) Methodological details

Batiçim quantifies Scope 1 GHG emissions under the operational control approach, consolidating all facilities within the reporting boundary. Emissions cover direct fuel consumption from cement kilns, mobile combustion sources, and stationary equipment. Calculations are carried out using the formula Activity Data (fuel use) × Emission Factor. The methodology is aligned with the IPCC 2006 Guidelines, the GHG Protocol Corporate Standard, and national emission factors published by the Ministry of Environment and Urbanization. Fuels covered include coal, petcoke, natural gas, diesel, fuel oil, LPG, and other fossil fuels used in cement kilns, company-owned vehicles, and on-site equipment. All Scope 1 data are subject to independent third-party verification annually, ensuring accuracy, transparency, and

consistency with international reporting frameworks. This approach provides comprehensive coverage of Batıçim's direct emissions and strengthens alignment with both global best practices and local regulatory requirements.

Scope 2 (location-based)

(7.5.1) Base year end

12/30/2022

(7.5.2) Base year emissions (metric tons CO₂e)

149653

(7.5.3) Methodological details

Scope 2 location-based emissions are calculated using electricity consumption data obtained from supplier invoices. The national grid emission factor published annually by TEİAŞ (0.442 tCO₂e/MWh) is applied. Methodology is aligned with the GHG Protocol Scope 2 Guidance and local regulatory requirements (TSRS). Emissions are calculated as Activity Data × Grid Emission Factor.

Scope 2 (market-based)

(7.5.1) Base year end

12/30/2022

(7.5.2) Base year emissions (metric tons CO₂e)

149653

(7.5.3) Methodological details

Scope 2 market-based emissions are quantified using the same activity data as the location-based method. As Batıçim has not yet procured renewable energy certificates (e.g. I-REC, YEK-G), market-based emissions are currently equivalent to location-based results. For future reporting periods, any purchased contractual instruments will be reflected in market-based calculations, in line with the GHG Protocol Scope 2 Guidance

Scope 3 category 1: Purchased goods and services

(7.5.1) Base year end

12/30/2022

(7.5.2) Base year emissions (metric tons CO2e)

1256780.86

(7.5.3) Methodological details

Emissions from purchased goods and services have been calculated starting from 2022, which is defined as the base year. The methodology is based on procurement data covering raw materials, packaging, and auxiliary materials. Activity data (tonnage of purchased goods) has been multiplied with category-specific emission factors from the GHG Protocol Scope 3 Standard and secondary databases. Reported data is subject to third-party verification in accordance with ISO 14064-3, ensuring transparency, accuracy, and alignment with international assurance practices. Emission factors are sourced from DEFRA 2023, ecoinvent, IPCC 2006 Guidelines, EPA standards, NKD Türkiye datasets, and the Cement Sector Scope 3 GHG Accounting and Reporting Guidance. This methodology comprehensively covers emissions across cement, ready-mix concrete, port, and energy operations

Scope 3 category 2: Capital goods

(7.5.1) Base year end

12/30/2022

(7.5.2) Base year emissions (metric tons CO2e)

415.48

(7.5.3) Methodological details

Capital goods emissions have been measured since 2022, which is defined as the base year. Calculations are based on procurement and investment data for purchased capital goods. Emissions are estimated using category-specific emission factors in line with the GHG Protocol Scope 3 Standard and secondary databases (DEFRA 2023, ecoinvent, EF IPCC 2006 - NKD Türkiye, EPA standards, and Cement Sector Scope 3 GHG Accounting and Reporting Guidance). Reported data is subject to independent third-party verification in accordance with ISO 14064-3, ensuring transparency, accuracy, and alignment with international assurance practices. This methodology covers cement, ready-mix concrete, port, and energy operations.

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

(7.5.1) Base year end

12/30/2022

(7.5.2) Base year emissions (metric tons CO2e)

219871.81

(7.5.3) Methodological details

Emissions from purchased fuels and energy-related activities (not already included in Scope 1 or 2) were calculated using activity data from supplier invoices and energy procurement records. Emission factors were applied from the GHG Protocol and national datasets. The calculation covers upstream lifecycle emissions (extraction, production, and transportation of fuels and purchased energy).

Scope 3 category 4: Upstream transportation and distribution

(7.5.1) Base year end

12/30/2022

(7.5.2) Base year emissions (metric tons CO2e)

774948.54

(7.5.3) Methodological details

Emissions from upstream transportation and distribution have been calculated since 2022, based on logistics and distribution data covering the transport of raw materials, packaging, and auxiliary goods. Activity data (ton-km) is derived from logistics records and multiplied by category-specific emission factors from DEFRA 2023 and the GHG Protocol Scope 3 Guidance. Additional reference datasets, including ecoinvent and EPA standards, as well as IPCC 2006 and NKD Türkiye, were used to ensure methodological robustness and sectoral alignment. Reported data is independently verified in accordance with ISO 14064-3, ensuring transparency, accuracy, and consistency with international assurance practices. This methodology covers cement, ready-mix concrete, port, and energy operations.

Scope 3 category 5: Waste generated in operations

(7.5.1) Base year end

12/30/2022

(7.5.2) Base year emissions (metric tons CO2e)

58.88

(7.5.3) Methodological details

Emissions from waste generated in operations were estimated using facility-level waste management data, covering both hazardous and non-hazardous waste. Reported waste quantities were multiplied by treatment-specific emission factors (landfilling, recycling, incineration) sourced from DEFRA 2023. The methodology is aligned with the GHG Protocol Scope 3 Standard. Reported data is independently verified in accordance with ISO 14064-3 to ensure transparency, accuracy, and consistency with international assurance practices.

Scope 3 category 6: Business travel

(7.5.1) Base year end

12/30/2022

(7.5.2) Base year emissions (metric tons CO2e)

36.13

(7.5.3) Methodological details

Business travel-related emissions were calculated for the 2022 base year using activity data collected from employee travel records (e.g., flights, accommodation, and other modes). Emission factors from the UK DEFRA 2023 database were applied consistently across all travel categories. This ensures methodological alignment, transparency, and comparability of results.

Scope 3 category 7: Employee commuting

(7.5.1) Base year end

12/30/2022

(7.5.2) Base year emissions (metric tons CO2e)

259.53

(7.5.3) Methodological details

Scope 3 emissions for business travel were calculated using the operational control approach in line with the GHG Protocol Corporate Value Chain (Scope 3) Standard. Business travel includes air travel and hotel accommodation for Batıçim's employees. The distance-based method was applied, multiplying activity data (passenger-kilometers by vehicle type and hotel nights) by the relevant emission factors. DEFRA 2023 conversion factors were used. Travel information was gathered from the company's travel management provider and internal declarations. Accordingly, 36.13 tCO₂e of emissions were reported for 2022

Scope 3 category 8: Upstream leased assets

(7.5.1) Base year end

12/30/2022

(7.5.2) Base year emissions (metric tons CO₂e)

0

(7.5.3) Methodological details

NOT CALCULATED

Scope 3 category 9: Downstream transportation and distribution

(7.5.1) Base year end

12/30/2022

(7.5.2) Base year emissions (metric tons CO₂e)

286551.33

(7.5.3) Methodological details

Scope 3 emissions for downstream transportation and distribution were calculated using the operational control approach under the GHG Protocol Corporate Value Chain (Scope 3) Standard. This category covers the transportation of sold products from our facilities to customers across all business units, including road, rail, and waterway transport. Emissions were quantified using the distance-based method, by multiplying the transported mass and distance by vehicle-specific emission factors. Each transport leg was calculated separately and aggregated to total emissions. Activity data is based on sales records, and emission factors were sourced from DEFRA Greenhouse Gas Reporting Conversion Factors 2023. Accordingly, 286,551.33 tCO₂e were reported for 2022.

Scope 3 category 10: Processing of sold products

(7.5.1) Base year end

12/30/2022

(7.5.2) Base year emissions (metric tons CO₂e)

24613

(7.5.3) Methodological details

Scope 3 emissions for processing of sold products were calculated using the operational control principle under the GHG Protocol Corporate Standard. The average-data method was applied, estimating emissions for processing of sold intermediate products (cement) based on secondary data and average emissions per process. The reported emissions cover electricity consumption at ready-mixed concrete plants, applying an emission factor for cement as per the Cement Sector Scope 3 GHG Accounting and Reporting Guidance (WBCSD). Emission factors were taken from DEFRA 2023 and the official dataset of the Turkish Ministry of Energy and Natural Resources link. Accordingly, 24,613.66 tCO₂e were reported for 2022.

Scope 3 category 11: Use of sold products

(7.5.1) Base year end

12/30/2022

(7.5.2) Base year emissions (metric tons CO₂e)

0

(7.5.3) Methodological details

NA

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

(7.5.1) Base year end

12/30/2022

(7.5.2) Base year emissions (metric tons CO₂e)

115277.64

(7.5.3) Methodological details

Scope 3 emissions for end-of-life treatment of sold products were calculated using the operational control approach under the GHG Protocol Corporate Value Chain (Scope 3) Standard. The average-data method was applied to account for waste treatment after consumer use. Waste-type-specific emission factors were used (DEFRA Greenhouse Gas Reporting Conversion Factors 2023). Since the product sold is concrete, it was conservatively assumed that all concrete is sent to landfill for disposal. The amount of sold product is based on sales data. Accordingly, 115,277.64 tCO₂e were reported for 2022.

[Fixed row]

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

Reporting year

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

2835208.66

(7.6.3) Methodological details

Scope 1 emissions for the reporting year 2024 were calculated based on actual fuel consumption (coal, petroleum coke, natural gas, diesel, and other fuels) at our facilities. Calculations followed the IPCC 2006 Guidelines and national emission factors published by the Turkish Ministry of Environment, Urbanization and Climate Change. Activity data (in tonnes, liters, Nm³) were converted to CO₂e using IPCC AR5 global warming potential values. The reported figure represents consolidated Scope 1 emissions of BATIÇİM and BATISÖKE operation

Past year 1

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

3315677.58

(7.6.2) End date

12/30/2023

(7.6.3) Methodological details

Batiçim consolidates Scope 1 emissions across its cement (Batiçim İzmir and Batisöke plants), ready-mixed concrete facilities, hydroelectric power plants and port operations under the operational control boundary, ensuring full coverage of direct emissions. Calculations are based on actual fuel consumption (coal, petroleum coke, natural gas, diesel, and other fuels) at each operation. The methodology strictly follows the 2006 IPCC Guidelines and applies official emission factors from the Turkish Ministry of Environment, Urbanization and Climate Change, with CO₂e conversions based on IPCC AR5 GWP values. Emissions data are subject to internal review and independent third-party verification, reinforcing accuracy, completeness, and credibility. This comprehensive and multi-sectoral approach reflects Batiçim's strong commitment to transparent disclosure, regulatory compliance, and alignment with international best practices, covering the full spectrum of its industrial activities.

Past year 2

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

3354684.07

(7.6.2) End date

12/30/2022

(7.6.3) Methodological details

Batiçim consolidates Scope 1 emissions across its cement (Batiçim İzmir and Batisöke plants), ready-mixed concrete facilities, hydroelectric power plants and port operations under the operational control boundary, ensuring full coverage of direct emissions. Calculations are based on actual fuel consumption (coal, petroleum coke, natural gas, diesel, and other fuels) at each operation. The methodology strictly follows the 2006 IPCC Guidelines and applies official emission factors from the Turkish Ministry of Environment, Urbanization and Climate Change, with CO₂e conversions based on IPCC AR5 GWP values. Emissions data are subject to internal review and independent third-party verification, reinforcing accuracy, completeness, and credibility. This comprehensive and multi-sectoral approach reflects Batiçim's strong commitment to transparent disclosure, regulatory compliance, and alignment with international best practices, covering the full spectrum of its industrial activities.

[Fixed row]

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

Reporting year

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

146755.82

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

146676.26

(7.7.4) Methodological details

Scope 2 emissions for 2024 were consolidated across Batıçim İzmir and Batisöke cement plants, ready-mixed concrete facilities, hydroelectric power plants and port operations, under the operational control approach. Activity data (MWh electricity consumption) was sourced from utility invoices and automated monitoring systems. In line with the GHG Protocol Scope 2 Guidance, both location-based and market-based approaches were applied. The location-based calculation used the national grid factor published by TEİAŞ (0.442 tCO₂e/MWh). No I-REC or equivalent renewable energy certificates were purchased in the reporting year; therefore, the market-based results are effectively the same as location-based values. All data have been internally reviewed and independently verified in accordance with ISO 14064-3, ensuring accuracy, transparency, and comparability with peers. This robust dual reporting approach demonstrates Batıçim's alignment with international best practices and its commitment to low-carbon electricity sourcing and transparent CDP disclosure.

Past year 1

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

158493.05

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

158493.05

(7.7.3) End date

(7.7.4) Methodological details

Scope 2 emissions for the years 2022, 2023, and 2024 were calculated based on electricity purchased from the national grid. Activity data (MWh electricity consumed) was obtained from facility-level utility invoices and internal monitoring systems. The national grid emission factor of 0.442 tCO₂e/MWh, as published by TEİAŞ (Turkish Electricity Transmission Corporation), was applied consistently across all three years. Both location-based and market-based approaches were reported. Since no I-REC or other renewable energy certificates were purchased during this period, the location-based and market-based results are effectively the same. Reported figures represent consolidated emissions across Batıçim İzmir and Batısöke cement plants, as well as ready-mixed concrete and port operations, in line with the operational control boundary. All reported data were subject to internal review and independent third-party verification under ISO 14064-3, ensuring transparency, accuracy, and alignment with international best practices.

Past year 2

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

149653.99

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

149653.99

(7.7.3) End date

12/30/2022

(7.7.4) Methodological details

Scope 2 emissions for the years 2022, 2023, and 2024 were calculated based on electricity purchased from the national grid. Activity data (MWh electricity consumed) was obtained from facility-level utility invoices and internal monitoring systems. The national grid emission factor of 0.442 tCO₂e/MWh, as published by TEİAŞ (Turkish Electricity Transmission Corporation), was applied consistently across all three years. Both location-based and market-based approaches were reported. Since no I-REC or other renewable energy certificates were purchased during this period, the location-based and market-based results are effectively the same. Reported figures represent consolidated emissions across Batıçim İzmir and Batısöke cement plants, as well as ready-mixed concrete and port operations, in line with the operational control boundary. All reported data were subject to internal review and independent third-party verification under ISO 14064-3, ensuring transparency, accuracy, and alignment with international best practices.

[Fixed row]

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

Purchased goods and services

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

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

181073.12

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Spend-based method

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

100

(7.8.5) Please explain

Emissions from purchased goods and services have been quantified since the 2022 base year in line with the GHG Protocol Corporate Value Chain (Scope 3) Standard. Calculations are based on procurement data covering key categories such as raw materials (e.g., clinker, gypsum), packaging, auxiliary materials, and services. The activity data (procurement volumes and expenditures) was converted into CO₂e using emission factors published by the U.S. EPA (most recent update). For major material categories such as cement additives and packaging, process-based emission factors were applied where available to improve accuracy. All Scope 3 – Category 1 calculations are subject to independent third-party verification under ISO 14064-3, ensuring transparency, accuracy, and compliance with international assurance standards. This governance approach strengthens the reliability of reported data and supports alignment with CDP expectations and global best practice.

Capital goods

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

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

6313.15

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Supplier-specific method

☒ Spend-based method

☒ Asset-specific method

☒ Investment-specific method

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

100

(7.8.5) Please explain

Emissions from capital goods have been calculated since 2022 in line with the GHG Protocol Scope 3 Standard. Calculations are based on annual investment and CAPEX data, covering major projects such as kiln modernization, machinery and equipment purchases, and infrastructure investments. Activity data (procurement values and quantities) was converted into CO₂e using emission factors published by the U.S. EPA. This ensures consistency with globally recognized databases while reflecting the embodied upstream emissions of purchased capital goods. Double counting with Scope 1 and 2 was avoided by limiting calculations to embedded emissions only, excluding operational fuel or electricity use. All reported figures are subject to independent third-party verification under ISO 14064-3, ensuring transparency, methodological robustness, and alignment with international assurance standards. This governance approach strengthens the reliability of disclosed data and supports Batıçim's alignment with CDP expectations and global best practice.

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

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

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

269858.41

(7.8.3) Emissions calculation methodology

Select all that apply

- ☒ Supplier-specific method
- ☒ Spend-based method

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

100

(7.8.5) Please explain

Emissions were calculated in accordance with the GHG Protocol Scope 3 Standard under Category 3 (Fuel- and energy-related activities not included in Scope 1 or 2). The spend-based approach was applied using company procurement and consumption data for purchased fuels and energy. Emission factors were sourced from the Ecoinvent/LCA database and aligned with internationally recognized life cycle assessment methodologies. The calculation covers upstream emissions associated with extraction, production, and transportation of fuels and electricity purchased and consumed by the company. The boundary includes all consolidated operations (BATIÇİM and BATISÖKE plants as well as subsidiaries).

Upstream transportation and distribution

(7.8.1) Evaluation status

Select from:

- ☒ Relevant, calculated

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

839.99

(7.8.3) Emissions calculation methodology

Select all that apply

- ☒ Supplier-specific method
- ☒ Hybrid method
- ☒ Spend-based method

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

100

(7.8.5) Please explain

Emissions from upstream and downstream transportation (Scope 3, Category 4) were calculated in line with the GHG Protocol Corporate Value Chain Standard. The activity-based approach was applied using logistics records (ton-km of raw materials, fuels, cement, and clinker transported by third parties). Emission factors were primarily sourced from the U.S. EPA database and supplemented with DEFRA transport conversion factors. The boundary covers both inbound and outbound distribution managed by external logistics providers. Reported data is independently verified in accordance with ISO 14064-3, ensuring transparency, accuracy, and alignment with international assurance practices.

Waste generated in operations

(7.8.1) Evaluation status

Select from:

- ☒ Relevant, calculated

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

808.51

(7.8.3) Emissions calculation methodology

Select all that apply

- ☒ Spend-based method
- ☒ Waste-type-specific method

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

(7.8.5) Please explain

Emissions were calculated in accordance with the GHG Protocol Scope 3 Standard, Category 4. The calculation applied an activity-based approach using logistics and transport data (ton-km of goods transported and outsourced distribution services). Emission factors were sourced from DEFRA (2023) transport conversion factors. The boundary covers both inbound (raw materials, fuels) and outbound (cement/clinker) transportation managed by third parties. Reported data is independently verified in accordance with ISO 14064-3, ensuring accuracy, transparency, and consistency with international assurance practices.

Business travel

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

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

184.54

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Distance-based method

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

100

(7.8.5) Please explain

Scope 3 emissions from business travel were calculated in accordance with the GHG Protocol Scope 3 Standard, Category 6. The calculation covers both air travel and hotel accommodation of employees. Activity data (passenger-kilometers for flights and number of hotel nights) was obtained from the company's travel management provider and internal declarations. Emissions were estimated using DEFRA 2023 conversion factors. Reported figures were independently verified in accordance with ISO 14064-3, ensuring accuracy, transparency, and compliance with international standards.

Employee commuting

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

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

258.5

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Distance-based method

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

100

(7.8.5) Please explain

Scope 3 emissions for employee commuting were calculated using the operational control principle in line with the GHG Protocol Corporate Value Chain (Scope 3) Standard. The distance-based method was applied, which involves collecting data on commuting distance and mode of transport, and applying emission factors specific to each mode. At Batıçim, commuting is primarily realized by scheduled buses and minibuses provided by the company. For calculation purposes, it was assumed that each trip operates at full passenger capacity, which may slightly overestimate total emissions. Distance data was sourced from supplier service agreements, and emission factors were based on DEFRA Greenhouse Gas Reporting Conversion Factors 2022. Accordingly, employee commuting emissions amounted to 259.53 tCO₂e in 2022, 291.82 tCO₂e in 2023, 258.50 tCO₂e in 2024

Upstream leased assets

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Please explain

Our leased assets are calculated under Scope 1 and 2 since they are under our operation control. Therefore, we don't have any emissions from upstream leased assets in the reporting year.

Downstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

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

22153.26

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Distance-based method

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

100

(7.8.5) Please explain

Scope 3 emissions have been calculated using the operational control principle within the framework of the Greenhouse Gas Protocol, Corporate Value Chain (Scope 3) Standard. This category covers the transportation and distribution of products sold by Batıçim from production facilities to customers and distribution points. The distance-based method has been applied, which involves determining the transported mass and the distance traveled, then applying the appropriate mass-distance emission factor for each transport mode. Because each transport mode (e.g., road, rail, and waterway) has different emission factors, each transport leg is calculated separately and then aggregated. Activity data on the amount of cement and concrete products transported is based on company sales and logistics records. Emission factors are sourced from the "DEFRA Greenhouse Gas Reporting: Conversion Factors."

Processing of sold products

(7.8.1) Evaluation status

Select from:

☒ Relevant, not yet calculated

End of life treatment of sold products

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

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

5276.79

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Waste-type-specific method

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

100

(7.8.5) Please explain

Scope 3 emissions have been calculated using the operational control principle within the framework of the Greenhouse Gas Protocol, Corporate Value Chain (Scope 3) Standard. For Batıçim, this category includes emissions arising from the waste disposal and treatment of cement and concrete products sold at the end of their life. The average-data method is applied, covering the period from the sale of products until the end of life after consumer use. The waste-type-specific method is used, which applies emission factors for concrete waste and corresponding waste treatment methods. Emissions are calculated based on the “DEFRA Greenhouse Gas Reporting: Conversion Factors 2023” tool. The amount of products treated as waste is derived from sales data. In line with a conservative approach, it is assumed that all concrete waste is disposed of through landfill. Emission factors are sourced from the “DEFRA Greenhouse Gas Reporting: Conversion Factors 2022.”

Downstream leased assets

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

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

143.75

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Spend-based method

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

100

(7.8.5) Please explain

Emissions were calculated using the operational control principle in line with the GHG Protocol Corporate Value Chain (Scope 3) Standard. This category covers emissions from assets owned by Batıçim but leased to other parties. Due to limited primary activity data, a spend-based approach was applied: lease-related expenditures were multiplied by sector-specific emission factors sourced from the DEFRA Greenhouse Gas Reporting Conversion Factors. The resulting impact was minor, with 143.75 tCO₂e reported in 2024, reflecting the limited scope of downstream leased activities within Batıçim's operations.

Franchises

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Please explain

A franchise is a business operating under a license to sell or distribute another company's goods or services within a certain location. We don't have any franchise. Therefore, we don't have any emissions from franchise in the reporting year

Investments

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

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

1414.75

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Spend-based method

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

100

(7.8.5) Please explain

Emissions were calculated using the operational control principle in line with the GHG Protocol Corporate Value Chain (Scope 3) Standard. Since emission data from investee companies was not available, a spend-based approach was applied. Investment amounts (TRY) were multiplied by sector-specific emission factors sourced from EPA. This approach provides an estimate of financed emissions based on the scale of investments. Accordingly, Batıçim reported 1,414.75 tCO₂e in 2024 under this category.

Other (upstream)

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Please explain

There are no additional upstream emission sources in the reporting year.

Other (downstream)

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Please explain

There are no additional upstream emission sources in the reporting year.

[Fixed row]

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

Past year 1

(7.8.1.2) Scope 3: Purchased goods and services (metric tons CO2e)

86098.14

(7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

453.35

(7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

190291.51

(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)

300239.61

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

183.27

(7.8.1.7) Scope 3: Business travel (metric tons CO2e)

48.66

(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)

291.82

(7.8.1.9) Scope 3: Upstream leased assets (metric tons CO2e)

0

(7.8.1.10) Scope 3: Downstream transportation and distribution (metric tons CO2e)

152102.31

(7.8.1.11) Scope 3: Processing of sold products (metric tons CO2e)

0

(7.8.1.12) Scope 3: Use of sold products (metric tons CO2e)

0

(7.8.1.13) Scope 3: End of life treatment of sold products (metric tons CO2e)

83810.19

(7.8.1.14) Scope 3: Downstream leased assets (metric tons CO2e)

0

(7.8.1.15) Scope 3: Franchises (metric tons CO2e)

0

(7.8.1.16) Scope 3: Investments (metric tons CO2e)

0

(7.8.1.17) Scope 3: Other (upstream) (metric tons CO2e)

0

(7.8.1.18) Scope 3: Other (downstream) (metric tons CO2e)

0

(7.8.1.19) Comment

Batiçim has progressively developed and enhanced its Scope 3 emissions measurement framework in line with the Greenhouse Gas Protocol – Corporate Value Chain (Scope 3) Standard, following the operational control principle. Over the period 2022–2024, the company significantly expanded the coverage of Scope 3 categories, introduced methodological refinements, and implemented digital tracking systems to improve accuracy and consistency. All Scope 3 emissions are externally verified by an independent third-party auditor and subsequently reviewed by the company's internal Sustainability Committee to ensure alignment with corporate climate strategy, CDP reporting requirements, and long-term decarbonization objectives. In 2022, Batiçim initiated Scope 3 reporting with a baseline year focusing primarily on upstream categories. Quantification was performed for Purchased goods and services (Category 1) using a spend-based approach supported by DEFRA and Ecoinvent emission factors, and for Capital goods (Category 2) with limited estimates based on financial data. Fuel- and energy-related activities (Category 3.6) were included using distance-based calculations for non-Scope 1 and 2 energy use. Upstream transportation and distribution (Category 4.1) was assessed with a distance-based methodology, while Waste generated in operations (Category 5) relied on spend-based data and disposal method assumptions. Business travel (Category 6) and Employee commuting (Category 7) were estimated using distance-based methods; commuting calculations were based on contracted shuttle services assuming full capacity. On the downstream side, Processing of sold products (Category 10) was included for ready-mixed concrete plants based on energy consumption estimates (11 kWh/tonne of cement). End-of-life treatment of sold products (Category 12) was conservatively estimated by assuming all products were landfilled. While methodological sophistication was limited, this year provided the initial Scope 3 inventory forming the foundation for further improvements. Verification confirmed methodological alignment with the GHG Protocol. In 2023, Batiçim broadened its Scope 3 coverage and improved calculation accuracy. Purchased goods and services (Cat. 1) was refined with more detailed procurement data and partial supplier-specific inputs. Fuel- and energy-related activities (Cat. 3.6) were recalculated with improved allocations. Upstream transportation and distribution (Cat. 4.1) and Downstream transportation and distribution (Cat. 9) were expanded with more accurate ton-kilometer records from logistics providers. Waste generated in operations (Cat. 5) was strengthened through facility-level waste tracking. Business travel (Cat. 6) and Employee commuting (Cat. 7) continued with distance-based calculations supported by service providers. For the first time, Investments (Cat. 15) were disclosed, applying a spend-based methodology using DEFRA sectoral factors. Data quality controls were enhanced, and external verification assured reliability. The Sustainability Committee formally reviewed the results and methodologies, ensuring their integration into corporate decarbonization planning. By 2024, Batiçim reached a higher level of maturity in Scope 3 measurement, supported by digital monitoring systems. Expanded coverage included Downstream leased assets (Cat. 13), quantified via energy-use data of leased facilities, and enhanced Investments (Cat. 15) using refined spend-based

factors. Logistics and waste data collection were increasingly digitalized, enabling more granular distance and disposal tracking. Supplier engagement efforts also improved activity data for Purchased goods and services (Cat. 1), increasing accuracy. Business travel calculations were further detailed with direct data from the travel management platform, while End-of-life treatment of sold products continued using DEFRA conversion factors, with methodology improvements under consideration. All Scope 3 categories were consolidated under a unified reporting framework, verified externally, and reviewed by the Sustainability Committee for strategic alignment. Between 2022 and 2024, Batıçım's Scope 3 emissions measurement evolved from baseline quantification toward a mature, digitally integrated, and externally verified system. Continuous improvement was ensured through methodological refinements, expanded category coverage, and alignment with international databases such as DEFRA and Ecoinvent. The Sustainability Committee regularly reviews the verified results, ensuring that Scope 3 disclosures not only meet CDP requirements but also actively guide corporate decarbonization roadmaps. This iterative process reflects Batıçım's commitment to transparency, accountability, and continuous progress in managing value chain emissions.

Past year 2

(7.8.1.2) Scope 3: Purchased goods and services (metric tons CO2e)

1256780.86

(7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

415.58

(7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

219871.81

(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)

774948.54

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

58.88

(7.8.1.7) Scope 3: Business travel (metric tons CO2e)

36.13

(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)

259.53

(7.8.1.9) Scope 3: Upstream leased assets (metric tons CO2e)

0

(7.8.1.10) Scope 3: Downstream transportation and distribution (metric tons CO2e)

286551.33

(7.8.1.11) Scope 3: Processing of sold products (metric tons CO2e)

24613.66

(7.8.1.12) Scope 3: Use of sold products (metric tons CO2e)

0

(7.8.1.13) Scope 3: End of life treatment of sold products (metric tons CO2e)

115277.64

(7.8.1.14) Scope 3: Downstream leased assets (metric tons CO2e)

0

(7.8.1.15) Scope 3: Franchises (metric tons CO2e)

0

(7.8.1.16) Scope 3: Investments (metric tons CO2e)

0

(7.8.1.17) Scope 3: Other (upstream) (metric tons CO2e)

(7.8.1.18) Scope 3: Other (downstream) (metric tons CO₂e)

(7.8.1.19) Comment

Batiçim has progressively developed and enhanced its Scope 3 emissions measurement framework in line with the Greenhouse Gas Protocol – Corporate Value Chain (Scope 3) Standard, following the operational control principle. Over the period 2022–2024, the company significantly expanded the coverage of Scope 3 categories, introduced methodological refinements, and implemented digital tracking systems to improve accuracy and consistency. All Scope 3 emissions are externally verified by an independent third-party auditor and subsequently reviewed by the company’s internal Sustainability Committee to ensure alignment with corporate climate strategy, CDP reporting requirements, and long-term decarbonization objectives. In 2022, Batiçim initiated Scope 3 reporting with a baseline year focusing primarily on upstream categories. Quantification was performed for Purchased goods and services (Category 1) using a spend-based approach supported by DEFRA and Ecoinvent emission factors, and for Capital goods (Category 2) with limited estimates based on financial data. Fuel- and energy-related activities (Category 3.6) were included using distance-based calculations for non-Scope 1 and 2 energy use. Upstream transportation and distribution (Category 4.1) was assessed with a distance-based methodology, while Waste generated in operations (Category 5) relied on spend-based data and disposal method assumptions. Business travel (Category 6) and Employee commuting (Category 7) were estimated using distance-based methods; commuting calculations were based on contracted shuttle services assuming full capacity. On the downstream side, Processing of sold products (Category 10) was included for ready-mixed concrete plants based on estimated electricity use (11 kWh/tonne of cement). End-of-life treatment of sold products (Category 12) was conservatively estimated by assuming all products were landfilled. While methodological sophistication was limited, this year provided the initial Scope 3 inventory forming the foundation for further improvements. Verification confirmed methodological alignment with the GHG Protocol. In 2023, Batiçim broadened its Scope 3 coverage and improved calculation accuracy. Purchased goods and services (Cat. 1) was refined with more detailed procurement data and partial supplier-specific inputs. Fuel- and energy-related activities (Cat. 3.6) were recalculated with improved allocations. Upstream transportation and distribution (Cat. 4.1) and Downstream transportation and distribution (Cat. 9) were expanded with more accurate ton-kilometer records from logistics providers. Waste generated in operations (Cat. 5) was strengthened through facility-level waste tracking. Business travel (Cat. 6) and Employee commuting (Cat. 7) continued with distance-based calculations supported by service providers. For the first time, Investments (Cat. 15) were disclosed, applying a spend-based methodology using DEFRA sectoral factors. Data quality controls were enhanced, and external verification assured reliability. The Sustainability Committee formally reviewed the results and methodologies, ensuring their integration into corporate decarbonization planning. By 2024, Batiçim reached a higher level of maturity in Scope 3 measurement, supported by digital monitoring systems. Expanded coverage included Downstream leased assets (Cat. 13), quantified via energy-use data of leased facilities, and enhanced Investments (Cat. 15) using refined spend-based factors. Logistics and waste data collection were increasingly digitalized, enabling more granular distance and disposal tracking. Supplier engagement efforts also improved activity data for Purchased goods and services (Cat. 1), increasing accuracy. Business travel calculations were further detailed with direct data from the travel management platform, while End-of-life treatment of sold products continued using DEFRA conversion factors, with methodology improvements under consideration. All Scope 3 categories were consolidated under a unified reporting framework, verified externally, and reviewed by the Sustainability Committee for strategic alignment. Between 2022 and 2024, Batiçim’s Scope 3 emissions measurement evolved from baseline quantification toward a mature, digitally integrated, and externally verified system. Continuous improvement was ensured through methodological refinements, expanded category coverage, and alignment with international databases such as DEFRA and Ecoinvent. Importantly, over the last two years, a change in the external verification provider and the integration of digitalized data systems have further improved the accuracy and reliability of reported figures. The Sustainability Committee regularly reviews these verified results, ensuring that Scope 3 disclosures not only meet CDP requirements but also actively guide corporate decarbonization roadmaps.

[Fixed row]

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

	Verification/assurance status
Scope 1	Select from: <input checked="" type="checkbox"/> Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	Select from: <input checked="" type="checkbox"/> Third-party verification or assurance process in place
Scope 3	Select from: <input checked="" type="checkbox"/> Third-party verification or assurance process in place

[Fixed row]

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

Row 1

(7.9.1.1) Verification or assurance cycle in place

Select from:

☒ Annual process

(7.9.1.2) Status in the current reporting year

Select from:

☒ Complete

(7.9.1.3) Type of verification or assurance

Select from:

☒ Reasonable assurance

(7.9.1.4) Attach the statement

Batıbeton_14064-1 Doğrulama Beyanı.pdf,Batısöke_14064-1 Doğrulama Beyanı.pdf,Batısöke_14064-1 Doğrulama Raporu.pdf,Batılıman Sera Gazı Doğrulama Beyanı.pdf,Batienerji_Sera Gazı Doğrulama Beyanı.pdf,Batılıman Liman İşletmeleri_14064-1 Doğrulama Raporu.pdf,Batıçim_14064-1 Doğrulama Raporu.pdf,Batıçim Enerji_14064-1 Doğrulama Raporu.pdf,Batıçim_14064-1 Doğrulama Beyanı.pdf,Batıbeton_14064-1 Doğrulama Raporu.pdf

(7.9.1.5) Page/section reference

Page 1 Full Report

(7.9.1.6) Relevant standard

Select from:

☒ ISO14064-3

(7.9.1.7) Proportion of reported emissions verified (%)

100

[Add row]

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

Row 1

(7.9.2.1) Scope 2 approach

Select from:

☒ Scope 2 location-based

(7.9.2.2) Verification or assurance cycle in place

Select from:

☒ Annual process

(7.9.2.3) Status in the current reporting year

Select from:

☒ Complete

(7.9.2.4) Type of verification or assurance

Select from:

☒ Reasonable assurance

(7.9.2.5) Attach the statement

Batıbeton_14064-1 Doğrulama Beyanı.pdf,Batisöke_14064-1 Doğrulama Beyanı.pdf,Batisöke_14064-1 Doğrulama Raporu.pdf,Batılıman Sera Gazı Doğrulama Beyanı.pdf,Batienerji_Sera Gazı Doğrulama Beyanı.pdf,Batılıman Liman İşletmeleri_14064-1 Doğrulama Raporu.pdf,Batıçim_14064-1 Doğrulama Raporu.pdf,Batıçim Enerji_14064-1 Doğrulama Raporu.pdf,Batıçim_14064-1 Doğrulama Beyanı.pdf,Batıbeton_14064-1 Doğrulama Raporu.pdf

(7.9.2.6) Page/ section reference

full report

(7.9.2.7) Relevant standard

Select from:

☒ ISO14064-3

(7.9.2.8) Proportion of reported emissions verified (%)

100

[Add row]

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

Row 1

(7.9.3.1) Scope 3 category

Select all that apply

- ☒ Scope 3: Capital goods
- ☒ Scope 3: Use of sold products
- ☒ Scope 3: Processing of sold products
- ☒ Scope 3: Purchased goods and services
- ☒ Scope 3: Waste generated in operations
- ☒ Scope 3: Upstream transportation and distribution
- ☒ Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2)

(7.9.3.2) Verification or assurance cycle in place

Select from:

- ☒ Annual process

(7.9.3.3) Status in the current reporting year

Select from:

- ☒ Complete

(7.9.3.4) Type of verification or assurance

Select from:

- ☒ Reasonable assurance

(7.9.3.5) Attach the statement

Batibeton_14064-1 Doğrulama Beyanı.pdf,Batisöke_14064-1 Doğrulama Beyanı.pdf,Batisöke_14064-1 Doğrulama Raporu.pdf,Batılıman Sera Gazı Doğrulama Beyanı.pdf,Batienerji_ Sera Gazı Doğrulama Beyanı.pdf,Batılıman Liman İşletmeleri_14064-1 Doğrulama Raporu.pdf,Batiçim_14064-1 Doğrulama Raporu.pdf,Batiçim Enerji_14064-1 Doğrulama Raporu.pdf,Batiçim_14064-1 Doğrulama Beyanı.pdf,Batibeton_14064-1 Doğrulama Raporu.pdf

(7.9.3.6) Page/section reference

full report

(7.9.3.7) Relevant standard

Select from:

☒ ISO14064-3

(7.9.3.8) Proportion of reported emissions verified (%)

100

[Add row]

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

Select from:

☒ Decreased

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

Change in renewable energy consumption

(7.10.1.1) Change in emissions (metric tons CO₂e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☒ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

NA

Other emissions reduction activities

(7.10.1.1) Change in emissions (metric tons CO₂e)

320495

(7.10.1.2) Direction of change in emissions

Select from:

☒ Decreased

(7.10.1.3) Emissions value (percentage)

53.11

(7.10.1.4) Please explain calculation

Through the expanded use of alternative fuels—including industrial waste streams, end-of-life tires, and biomass residues—Batiçim achieved one of the most significant year-on-year reductions in its carbon footprint. In 2024, the company reduced its reliance on coal and fuel oil by implementing a comprehensive fuel substitution program across cement kilns, supported by investments in co-processing infrastructure and systematic monitoring of substitution rates. This program alone delivered a reduction of 98,885 tCO₂e, while expanded utilization of agricultural residues and wood-based by-products contributed an additional 4,960 tCO₂e. Taken together, alternative fuels and biomass lowered Scope 1 emissions by 103,845 tCO₂e. Biomass, recognized as carbon-neutral under international accounting standards, also supported circular economy goals by diverting waste from landfills. Overall, consolidated Scope 1+2 emissions decreased by 492,206.15 tCO₂e (-14.17%), from 3,474,170.63 to 2,981,964.48 tCO₂e. Of this reduction, 171,710.57 tCO₂e was explained by lower production at Batisöke Cement, 103,845 tCO₂e by higher alternative fuel and biomass use, and 216,650.58 tCO₂e by reduced coal consumption, a lower fossil share in the kiln fuel mix, incremental efficiency gains, and modest electricity consumption changes. The combined impact of fuel substitution, biomass, and reduced fossil use thus accounted for 320,495.58 tCO₂e of the total reduction. The remaining changes were associated with production-related fluctuations and operational adjustments. All figures are consolidated across Batiçim's 2 cement plants, 1 grinding/package plant, 22 ready-mix concrete plants, 1 port, and 2 hydropower plants under operational control. Emission factors are third-party verified, ensuring that reported reductions are accurate and reliable. By prioritizing alternative fuels and integrating biomass, Batiçim not only reduces

absolute CO₂ emissions but also enhances resilience to volatile fossil fuel markets, strengthens compliance with national climate policies, and aligns with the EU Green Deal's decarbonization pathway for energy-intensive industries. These results reflect Batıçim's commitment to decarbonization, resource efficiency, and leadership in sector-wide climate action.

Divestment

(7.10.1.1) Change in emissions (metric tons CO₂e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☒ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

NA

Acquisitions

(7.10.1.1) Change in emissions (metric tons CO₂e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☒ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

NA

Mergers

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☒ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

NA

Change in output

(7.10.1.1) Change in emissions (metric tons CO2e)

171710.57

(7.10.1.2) Direction of change in emissions

Select from:

☒ Decreased

(7.10.1.3) Emissions value (percentage)

15.07

(7.10.1.4) Please explain calculation

In 2023, production at the Batisöke cement plant totaled 2,113,603.71 tons, while in 2024 output decreased to 1,780,560.95 tons. This reduction in production volume directly translated into lower energy and fuel demand, leading to a decrease of approximately 171,711 tCO₂e in Scope 1 emissions. The decline is primarily attributed to fewer raw materials being processed and reduced kiln operation hours, which in turn lowered fossil fuel combustion and electricity consumption. While this reduction reflects short-term operational dynamics rather than structural efficiency gains, it nonetheless demonstrates the sensitivity of absolute emissions to production levels. Batıçim continues to monitor both absolute emissions and emissions intensity (tCO₂e/ton cement equivalent) to ensure that progress in decarbonization is not solely dependent on fluctuations in production volumes but also supported by efficiency improvements, alternative fuel use, and renewable energy integration.

Change in methodology

(7.10.1.1) Change in emissions (metric tons CO₂e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☒ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

NA

Change in boundary

(7.10.1.1) Change in emissions (metric tons CO₂e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☒ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

NA

Change in physical operating conditions

(7.10.1.1) Change in emissions (metric tons CO₂e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☒ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

NA

Unidentified

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☒ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

NA

[Fixed row]

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

Select from:

☒ Location-based

(7.12) Are carbon dioxide emissions from biogenic carbon relevant to your organization?

Select from:

☒ Yes

(7.12.1) Provide the emissions from biogenic carbon relevant to your organization in metric tons CO2.

	CO2 emissions from biogenic carbon (metric tons CO2)	Comment
	5173.23	End-of-Life Tires and biomass waste are categorized as biogenic sources.

[Fixed row]

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

Select from:

☒ Yes

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

Row 1

(7.15.1.1) Greenhouse gas

Select from:

☒ CO2

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

2840399.851

(7.15.1.3) GWP Reference

Select from:

☒ IPCC Sixth Assessment Report (AR6 - 100 year)

Row 2

(7.15.1.1) Greenhouse gas

Select from:

☒ CH4

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

21.86

(7.15.1.3) GWP Reference

Select from:

☒ IPCC Sixth Assessment Report (AR6 - 100 year)

Row 3

(7.15.1.1) Greenhouse gas

Select from:

☒ N2O

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

592.82

(7.15.1.3) GWP Reference

Select from:

☒ IPCC Sixth Assessment Report (AR6 - 100 year)

[Add row]

(7.16) Break down your total gross global Scope 1 and 2 emissions by country/area.

	Scope 1 emissions (metric tons CO2e)	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Turkey	2835208	146755	146676.26

[Fixed row]

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

Select all that apply

☒ By facility

(7.17.2) Break down your total gross global Scope 1 emissions by business facility.

Row 1

(7.17.2.1) Facility

Batiçim İzmir Factory is a key source of Scope 1 emissions, mainly from fuel combustion in clinker production, the most carbon-intensive stage of cement manufacturing. In 2023, Scope 1 emissions totaled 1,267,635 tCO₂e, decreasing slightly to 1,248,604 tCO₂e in 2024. The factory reduces its reliance on fossil fuels by increasing the share of alternative fuels, contributing to lower direct GHG emissions.

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

1248603.9

(7.17.2.3) Latitude

38.4807

(7.17.2.4) Longitude

27.2425

Row 2

(7.17.2.1) Facility

Batisöke Factory is another major contributor to Scope 1 emissions, primarily from clinker production fuel use. In 2023, emissions reached 2,045,291 tCO₂e, decreasing significantly to 1,577,926 tCO₂e in 2024. The reduction is mainly driven by lower production volumes and higher substitution of fossil fuels with alternative fuels and biomass, which directly mitigates CO₂ emissions at source.

(7.17.2.2) Scope 1 emissions (metric tons CO₂e)

1577926.27

(7.17.2.3) Latitude

37.7489

(7.17.2.4) Longitude

27.41

Row 3

(7.17.2.1) Facility

Other subsidiaries represent a minor share of Scope 1 emissions compared to the main cement plants. In 2023, emissions were 2,752 tCO₂e, rising to 8,678 tCO₂e in 2024. These emissions originate mainly from fuel use in support facilities and small-scale operations. While relatively limited in scale, they are monitored and included in Batıçim's consolidated reporting to ensure full coverage of direct GHG sources.

(7.17.2.2) Scope 1 emissions (metric tons CO₂e)

8678.49

(7.17.2.3) Latitude

0

(7.17.2.4) Longitude

0

[Add row]

(7.19) Break down your organization's total gross global Scope 1 emissions by sector production activity in metric tons CO₂e.

Cement production activities

(7.19.1) Gross Scope 1 emissions, metric tons CO₂e

2826530.17

(7.19.2) Net Scope 1 emissions , metric tons CO₂e

2826530.17

(7.19.3) Comment

Cement production represents the overwhelming majority of Batıçım's direct (Scope 1) greenhouse gas emissions, in line with the global cement industry's profile where fuel combustion in clinker kilns is the dominant source of CO₂. In 2023, consolidated Scope 1 emissions across Batıçım amounted to 3,315,678 tCO₂e, of which cement production (Batıçım İzmir and Batisöke plants) accounted for 3,312,926 tCO₂e, equivalent to over 99.9% of total Scope 1. In 2024, total consolidated Scope 1 emissions decreased to 2,835,209 tCO₂e, of which cement production represented 2,826,530 tCO₂e, corresponding to over 99.7% of the total. The year-on-year decline of nearly 480,000 tCO₂e (14.5%) in cement-related emissions is attributable to three main drivers: Lower production volumes – clinker output fell significantly, particularly at Batisöke, reflecting demand and operational adjustments. This production decrease contributed approximately 171,711 tCO₂e to the overall reduction. Fuel switching – the increased use of alternative fuels (industrial wastes and end-of-life tires) substituted coal and petcoke, delivering an emission reduction of 98,885 tCO₂e. Increased biomass utilization – further contributed 4,960 tCO₂e in avoided emissions. These measures highlight the effectiveness of Batıçım's climate transition strategy, where both operational factors (output changes) and structural improvements (fuel mix optimization) reduce direct carbon intensity. Despite the smaller share of "other operations" (concrete, energy, port) rising from 2,752 tCO₂e in 2023 to 8,678 tCO₂e in 2024, their impact on the total remains marginal (<0.3%). Overall, cement production continues to dominate Batıçım's Scope 1 profile. The combination of production scaling, fuel diversification, and biomass integration enabled a total reduction of approximately 103,845 tCO₂e, equating to a 3% decrease versus the 2023 baseline, directly linked to decarbonization efforts rather than demand variation alone. These results are externally verified and reviewed by the Sustainability Committee to ensure alignment with CDP disclosure requirements and the company's long-term decarbonization roadmap.

[Fixed row]

(7.20) Indicate which gross global Scope 2 emissions breakdowns you are able to provide.

Select all that apply

☒ By facility

(7.20.2) Break down your total gross global Scope 2 emissions by business facility.

Row 1

(7.20.2.1) Facility

In 2024, Batıçim İzmir recorded 60,386 tCO₂e Scope 2 emissions from purchased electricity. This level is consistent with 2023, indicating stable operations and efficient energy management.

(7.20.2.2) Scope 2, location-based (metric tons CO₂e)

60385.82

(7.20.2.3) Scope 2, market-based (metric tons CO₂e)

60385.82

Row 2

(7.20.2.1) Facility

Batisöke reported 83,175 tCO₂e Scope 2 emissions in 2024, the highest among facilities. Compared to 2023, emissions declined, reflecting electricity efficiency gains in cement production.

(7.20.2.2) Scope 2, location-based (metric tons CO₂e)

83174.57

(7.20.2.3) Scope 2, market-based (metric tons CO₂e)

83174.57

Row 3

(7.20.2.1) Facility

Other subsidiaries, including ready-mix concrete and port operations, accounted for 3,195 tCO₂e Scope 2 emissions in 2024. Their contribution is relatively small, representing only a minor share of consolidated emissions.

(7.20.2.2) Scope 2, location-based (metric tons CO₂e)

3195.43

(7.20.2.3) Scope 2, market-based (metric tons CO₂e)

3195.43

[Add row]

(7.21) Break down your organization’s total gross global Scope 2 emissions by sector production activity in metric tons CO₂e.

Cement production activities

(7.21.1) Scope 2, location-based, metric tons CO₂e

143561

(7.21.2) Scope 2, market-based (if applicable), metric tons CO₂e

143561

(7.21.3) Comment

In 2024, cement operations reported 143,561 tCO₂e Scope 2 emissions, accounting for about 98% of total Scope 2 emissions. This reflects the high electricity demand of cement production processes such as grinding and kiln operations

[Fixed row]

(7.22) Break down your gross Scope 1 and Scope 2 emissions between your consolidated accounting group and other entities included in your response.

Consolidated accounting group

(7.22.1) Scope 1 emissions (metric tons CO₂e)

2835208.66

(7.22.2) Scope 2, location-based emissions (metric tons CO₂e)

146755.82

(7.22.3) Scope 2, market-based emissions (metric tons CO₂e)

146676.26

(7.22.4) Please explain

The consolidated accounting group includes Batıçim's major subsidiaries that are fully consolidated under financial control: İzmir and Batisöke cement factories, ready-mix concrete operations, energy production (Batienerji), and port services (Batiliman). These facilities account for the overwhelming share of the company's Scope 1 and Scope 2 emissions. In 2024, the consolidated group reported 2,835,209 tCO₂e Scope 1 and 146,756 tCO₂e Scope 2 emissions. Compared to 2023, this represents a decline of approximately 14% in Scope 1, primarily due to lower clinker output at Batisöke and expanded substitution of fossil fuels with alternative fuels and biomass. Scope 2 emissions decreased by 7% following efficiency improvements and reduced electricity use. Cement production remains the largest contributor, while other consolidated subsidiaries (ready-mix, energy, port) have a marginal share but are included for completeness. Consolidated results are externally verified and reviewed by the Sustainability Committee to ensure transparency and alignment with CDP and GHG Protocol standards.

All other entities

(7.22.1) Scope 1 emissions (metric tons CO₂e)

8678.49

(7.22.2) Scope 2, location-based emissions (metric tons CO2e)

3195.43

(7.22.3) Scope 2, market-based emissions (metric tons CO2e)

3115.87

(7.22.4) Please explain

Emissions reported under “all other entities” relate to affiliates that are not part of the consolidated accounting group but are disclosed for transparency. These include certain small-scale operations with minimal direct emissions. In 2024, these entities accounted for 8,678 tCO₂e Scope 1 and 3,195 tCO₂e Scope 2, together representing less than 3% of the total organizational footprint. While small in scale compared to consolidated cement and energy activities, their inclusion ensures full coverage of Batıçım’s value chain. Continuous improvement in data collection, including digital monitoring tools, is expected to enhance accuracy in future disclosures. These results confirm that Scope 1 and 2 emissions are overwhelmingly concentrated in the consolidated group, but also highlight Batıçım’s commitment to measuring and reporting all relevant sources across the organization.

[Fixed row]

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

Select from:

☒ Yes

(7.23.1) Break down your gross Scope 1 and Scope 2 emissions by subsidiary.

Row 1

(7.23.1.1) Subsidiary name

Batisöke Söke Çimento Sanayii T.A.Ş.

(7.23.1.2) Primary activity

Select from:

☒ Cement

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☒ ISIN code – bond

(7.23.1.4) ISIN code – bond

TRABSOKE91F5

(7.23.1.12) Scope 1 emissions (metric tons CO₂e)

1577926.27

(7.23.1.13) Scope 2, location-based emissions (metric tons CO₂e)

83174.57

(7.23.1.14) Scope 2, market-based emissions (metric tons CO₂e)

83174.57

(7.23.1.15) Comment

Batisöke, as a key subsidiary of Batı Anadolu Group, monitors, reports, and manages its greenhouse gas (GHG) emissions in line with international sustainability frameworks and climate action goals. The company discloses Scope 1 (direct) and Scope 2 (indirect – purchased energy related) emissions, enabling stakeholders to track its carbon footprint over time and assess its alignment with decarbonization pathways required by the Paris Agreement and the European Green Deal. Scope 1 emissions represent the largest share of Batisöke's carbon footprint, mainly arising from fossil fuel combustion in kilns and the process emissions linked to the calcination of limestone during clinker production. These emissions are inherent to cement manufacturing and constitute the most critical challenge for the sector globally. Between 2022 and 2024, Batisöke's Scope 1 emissions decreased from 2,092,158.83 tCO₂e in 2022 to 1,577,926.27 tCO₂e in 2024, reflecting the effectiveness of measures such as the gradual introduction of alternative fuels, improvements in thermal efficiency, and optimization of production processes. Scope 2 emissions, which are significantly lower compared to Scope 1, originate from the consumption of purchased electricity. In Batisöke's plant, electricity is mainly required for grinding, material transport, and ventilation systems. The reported data shows a decline in Scope 2 emissions from 90,524.43 tCO₂e in 2022 to 83,174.57 tCO₂e in 2024, confirming the company's efforts to improve energy efficiency. When combined, total Scope 1 and Scope 2 emissions for Batisöke illustrate a consistent reduction across the reporting period, from 2,182,683.26 tCO₂e in 2022 to 1,661,100.84 tCO₂e in 2024. This positive trajectory is a clear outcome of

Batisöke's environmental strategy, which prioritizes sustainable growth, resource efficiency, and technological innovation. By disclosing these results transparently, the company demonstrates accountability and a proactive stance in tackling climate-related risks.

Row 2

(7.23.1.1) Subsidiary name

Batibeton Sanayi A.Ş

(7.23.1.2) Primary activity

Select from:

☒ Concrete products

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☒ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

8596.73

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

2374.6

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

2374.6

(7.23.1.15) Comment

Batibeton, as a subsidiary of Batı Anadolu Group, systematically monitors, calculates, and discloses its greenhouse gas (GHG) emissions in line with internationally recognized frameworks, ensuring full alignment with the Group's broader decarbonization roadmap and global climate action targets. By reporting transparently across Scope 1, Scope 2, and Scope 3 categories, Batibeton provides stakeholders with a clear view of its carbon footprint and the measures undertaken to mitigate

climate-related risks. The reported data show that Batibeton's Scope 1 emissions amount to 8,596.73 tCO₂e, originating mainly from the consumption of fossil fuels in company-owned vehicles, machinery, and equipment. As a ready-mixed concrete producer, Batibeton's direct emissions are relatively modest compared to cement manufacturing, since it does not engage in energy-intensive clinker production. Instead, its Scope 1 profile is shaped primarily by transportation fleets, batching plant operations, and auxiliary fuel consumption. Scope 2 emissions, totaling 2,374 tCO₂e, are linked to the consumption of purchased electricity used to power batching plants, mixing systems, and related auxiliary equipment. Although smaller in scale, these emissions highlight the critical role of energy efficiency improvements and the potential for renewable electricity procurement. Transitioning toward low-carbon electricity represents a key opportunity for Batibeton to reduce its indirect emissions and strengthen its contribution to the Group's overall climate strategy. By disclosing these results transparently and embedding emission reduction measures into its operations, Batibeton demonstrates accountability, operational efficiency, and commitment to the decarbonization journey of Batı Anadolu Group.

Row 3

(7.23.1.1) Subsidiary name

Batılıman Liman İşletmeleri A.Ş

(7.23.1.2) Primary activity

Select from:

☒ Transportation support services

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☒ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO₂e)

21.95

(7.23.1.13) Scope 2, location-based emissions (metric tons CO₂e)

441.06

(7.23.1.14) Scope 2, market-based emissions (metric tons CO₂e)

441.06

(7.23.1.15) Comment

Batılıman Liman İşletmeleri A.Ş., as the logistics and port operations subsidiary of Batı Anadolu Group, contributes to the Group's overall environmental performance reporting by disclosing its direct and indirect greenhouse gas (GHG) emissions. Although its emission profile differs significantly from energy-intensive industrial operations such as cement or concrete production, transparent monitoring and disclosure are equally critical in ensuring comprehensive climate accountability across the Group. The company's Scope 1 emissions are reported at 21,95 tons CO₂e. These represent direct emissions from sources owned or controlled by Batılıman, such as fuel combustion in port vehicles, cargo-handling equipment, and auxiliary machinery. Given the nature of port operations, these emissions are relatively low compared to heavy industrial facilities. Nevertheless, they are a meaningful indicator of Batılıman's operational efficiency and fuel management practices. Initiatives such as transitioning to electric or hybrid vehicles and improving fuel-use efficiency can further reduce Scope 1 emissions in future reporting cycles. Scope 2 emissions, totaling 441,06 tons CO₂e, arise from purchased electricity used in the company's facilities and operations. For a port operator, electricity demand is primarily linked to lighting systems, cranes, conveyor belts, warehouses, and supporting infrastructure. The fact that Scope 2 emissions are considerably higher than Scope 1 indicates that Batılıman's carbon footprint is largely shaped by energy consumption patterns rather than direct fuel use. This provides an important opportunity for decarbonization through measures such as adopting renewable electricity contracts, improving energy efficiency, and deploying smart energy management systems. Taken together, Batılıman's total GHG emissions amount to approximately 17897,26 tons CO₂e, the majority of which stem from indirect electricity consumption. This distribution highlights the strategic importance of energy transition in port operations.

Row 4

(7.23.1.1) Subsidiary name

Batıçim Enerji Elektrik Üretim A.Ş

(7.23.1.2) Primary activity

Select from:

☒ Energy services & equipment

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☒ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO₂e)

59.81

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

379.77

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

379.77

(7.23.1.15) Comment

Batı Enerji, the energy generation subsidiary of Batı Anadolu Group, plays a critical role in supporting the Group's industrial operations while simultaneously contributing to the Group's overall sustainability strategy. As an energy company, its carbon footprint is carefully measured and disclosed to ensure transparency and to align with global standards on greenhouse gas (GHG) emissions reporting. According to the latest data, Scope 1 emissions at Batı Enerji amount to 59,81 tons CO₂e. These represent direct emissions from sources owned or controlled by the company, primarily related to the combustion of fuels in energy generation facilities. Although relatively modest compared to heavy industrial plants, these emissions are an important measure of the company's operational efficiency and fuel usage. Continued investments in advanced technologies, cleaner fuels, and improved maintenance practices provide opportunities for further reductions in Scope 1 emissions. Scope 2 emissions, recorded at 379,77 tons CO₂e, reflect indirect emissions from purchased electricity. In the context of Batı Enerji, Scope 2 values capture the electricity demand of administrative offices, supporting facilities, and auxiliary systems. These emissions are higher than Scope 1, demonstrating that the company's environmental profile is significantly influenced by electricity-related activities. This underlines the importance of expanding renewable energy integration, enhancing energy efficiency, and adopting innovative energy management systems. Taken together, Batı Enerji's total emissions reach approximately 439,58 tons CO₂e, with the majority coming from Scope 2. This distribution pattern shows that while direct operational emissions remain relatively limited, electricity consumption and related indirect emissions present a key area of focus for decarbonization. By prioritizing renewable energy sourcing and efficiency improvements, Batı Enerji has the potential to significantly reduce its environmental impact over time. Through transparent disclosure of its Scope 1 and Scope 2 emissions, Batı Enerji aligns itself with Batı Anadolu Group's sustainability commitments and international climate targets.

Row 5

(7.23.1.1) Subsidiary name

ASH Plus Yapı Malzemeleri San. Tic. A.Ş.

(7.23.1.2) Primary activity

Select from:

☒ Construction & building materials dealing & distribution

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☒ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

0

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

0

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

0

(7.23.1.15) Comment

ASH Plus Yapı Malzemeleri San. Tic. A.Ş., a subsidiary of Batı Anadolu Group, currently does not carry out production activities and is not operational in terms of industrial processes. As a result, the company does not generate measurable greenhouse gas (GHG) emissions under Scope 1 or Scope 2. Both categories are therefore reported as zero for the current reporting period.

Row 6

(7.23.1.1) Subsidiary name

Batıçim Batı Anadolu Çimento Sanayi A.Ş.

(7.23.1.2) Primary activity

Select from:

☒ Cement

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☒ ISIN code – bond

(7.23.1.4) ISIN code – bond

TRABTCIM91F5

(7.23.1.12) Scope 1 emissions (metric tons CO₂e)

1248603.9

(7.23.1.13) Scope 2, location-based emissions (metric tons CO₂e)

60385.82

(7.23.1.14) Scope 2, market-based emissions (metric tons CO₂e)

60385.82

(7.23.1.15) Comment

Batiçim İzmir Fabrikası, as one of the core operations of Batı Anadolu Group, monitors, reports, and manages its greenhouse gas (GHG) emissions in line with international sustainability frameworks and climate action goals. The plant discloses Scope 1 (direct) and Scope 2 (indirect – purchased energy related) emissions, enabling stakeholders to track its carbon footprint over time and assess its alignment with decarbonization pathways required by the Paris Agreement and the European Green Deal. Scope 1 emissions represent the largest share of the İzmir plant's carbon footprint, mainly arising from fossil fuel combustion in kilns and the process emissions linked to the calcination of limestone during clinker production. These emissions are inherent to cement manufacturing and constitute the most critical challenge for the sector globally. Between 2022 and 2024, Scope 1 emissions remained relatively stable, recorded as 1,248,664.55 tCO₂e in 2022, 1,267,634.62 tCO₂e in 2023, and 1,248,603.90 tCO₂e in 2024, demonstrating the plant's ability to sustain operational efficiency despite production fluctuations. Scope 2 emissions, which are significantly lower compared to Scope 1, originate from the consumption of purchased electricity. At the İzmir plant, electricity is mainly required for grinding, material transport, and ventilation systems. Data shows a decrease from 56,357.12 tCO₂e in 2022 to 60,385.82 tCO₂e in 2024, with slight year-on-year variations reflecting operational demand and efficiency measures. When combined, total Scope 1 and Scope 2 emissions for Batiçim İzmir Factory illustrate a steady performance, recorded at 1,305,021.67 tCO₂e in 2022 and 1,308,989.72 tCO₂e in 2024. This stability highlights the plant's resilience in managing carbon emissions through efficiency programs, increased use of alternative fuels, and energy optimization measures. By disclosing these results transparently, Batiçim İzmir Factory demonstrates accountability and a proactive stance in tackling climate-related risks, while supporting the Group's broader environmental strategy focused on sustainable growth, resource efficiency, and technological innovation.

[Add row]

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

Select from:

☒ More than 10% but less than or equal to 15%

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

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	Select from: <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired electricity	Select from: <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired heat	Select from: <input checked="" type="checkbox"/> No
Consumption of purchased or acquired steam	Select from: <input checked="" type="checkbox"/> No
Consumption of purchased or acquired cooling	Select from: <input checked="" type="checkbox"/> No
Generation of electricity, heat, steam, or cooling	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

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

Consumption of fuel (excluding feedstock)

(7.30.1.1) Heating value

Select from:

☒ LHV (lower heating value)

(7.30.1.2) MWh from renewable sources

168233

(7.30.1.3) MWh from non-renewable sources

3007134

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

3175367.00

Consumption of purchased or acquired electricity

(7.30.1.1) Heating value

Select from:

☒ LHV (lower heating value)

(7.30.1.2) MWh from renewable sources

167773.58

(7.30.1.3) MWh from non-renewable sources

202342.52

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

370116.10

Consumption of self-generated non-fuel renewable energy

(7.30.1.1) Heating value

Select from:

☒ LHV (lower heating value)

(7.30.1.2) MWh from renewable sources

48099

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

48099.00

Total energy consumption

(7.30.1.1) Heating value

Select from:

☒ LHV (lower heating value)

(7.30.1.2) MWh from renewable sources

384105.58

(7.30.1.3) MWh from non-renewable sources

3161377

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

3545482.58

[Fixed row]

(7.30.2) Report your organization's energy consumption totals (excluding feedstocks) for cement production activities in MWh.

	Heating value	Total MWh
Consumption of fuel (excluding feedstocks)	<i>Select from:</i> <input checked="" type="checkbox"/> LHV (lower heating value)	3175367
Consumption of purchased or acquired electricity	<i>Select from:</i> <input checked="" type="checkbox"/> LHV (lower heating value)	370116
Consumption of other purchased or acquired energy (heat, steam and/or cooling)	<i>Select from:</i> <input checked="" type="checkbox"/> LHV (lower heating value)	Numeric input
Total energy consumption	<i>Select from:</i>	3545483

[Fixed row]

(7.30.6) Select the applications of your organization's consumption of fuel.

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	<i>Select from:</i> <input checked="" type="checkbox"/> No
Consumption of fuel for the generation of heat	<i>Select from:</i> <input checked="" type="checkbox"/> Yes
Consumption of fuel for the generation of steam	<i>Select from:</i>

	Indicate whether your organization undertakes this fuel application
	<input checked="" type="checkbox"/> No
Consumption of fuel for the generation of cooling	Select from: <input checked="" type="checkbox"/> No
Consumption of fuel for co-generation or tri-generation	Select from: <input checked="" type="checkbox"/> No

[Fixed row]

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

Sustainable biomass

(7.30.7.1) Heating value

Select from:

☒ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

0

Other biomass

(7.30.7.1) Heating value

Select from:

☒ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

168233

(7.30.7.8) Comment

All the biomass used is from waste sources.

Other renewable fuels (e.g. renewable hydrogen)

(7.30.7.1) Heating value

Select from:

☒ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

0

Coal

(7.30.7.1) Heating value

Select from:

☒ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

1483756

(7.30.7.8) Comment

It is the data obtained by multiplying the ton amount of imported lignite and domestic lignite calculations with the MWh conversion factor for each type of coal.

Oil

(7.30.7.1) Heating value

Select from:

☒ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

5364

(7.30.7.8) Comment

Fuel oil is used as a supplementary fuel in clinker production.

Gas

(7.30.7.1) Heating value

Select from:

☒ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.8) Comment

Natural gas is not used.

Other non-renewable fuels (e.g. non-renewable hydrogen)

(7.30.7.1) Heating value

Select from:

☒ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

1518014

(7.30.7.8) Comment

It is the data obtained by the ton amount of petroleum coke calculations with the MWh conversion factor.

Total fuel

(7.30.7.1) Heating value

Select from:

☒ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

3175367

(7.30.7.8) Comment

Sum of all mentioned fuels.

[Fixed row]

(7.30.8) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel for cement production activities.

Sustainable biomass

(7.30.8.1) Heating value

Select from:

☒ LHV

(7.30.8.2) Total MWh fuel consumed for cement production activities

0

(7.30.8.3) MWh fuel consumed at the kiln

0

(7.30.8.4) MWh fuel consumed for the generation of heat that is not used in the kiln

0

Other biomass

(7.30.8.1) Heating value

Select from:

☒ LHV

(7.30.8.2) Total MWh fuel consumed for cement production activities

168233

(7.30.8.3) MWh fuel consumed at the kiln

168233

(7.30.8.4) MWh fuel consumed for the generation of heat that is not used in the kiln

0

(7.30.8.7) Comment

Other biomass includes biogenic waste materials utilized as alternative fuels in cement kilns. These materials are exclusively used for clinker kiln energy, with no application in electricity generation, external heat, or cogeneration.

Other renewable fuels (e.g. renewable hydrogen)

(7.30.8.1) Heating value

Select from:

☒ LHV

(7.30.8.2) Total MWh fuel consumed for cement production activities

0

(7.30.8.3) MWh fuel consumed at the kiln

0

(7.30.8.4) MWh fuel consumed for the generation of heat that is not used in the kiln

0

(7.30.8.7) Comment

During the reporting period, no renewable hydrogen or other renewable fuels under this category were consumed in our cement production activities. Therefore, the reported consumption is zero.

Coal

(7.30.8.1) Heating value

Select from:

☒ LHV

(7.30.8.2) Total MWh fuel consumed for cement production activities

1483756

(7.30.8.3) MWh fuel consumed at the kiln

1483756

(7.30.8.4) MWh fuel consumed for the generation of heat that is not used in the kiln

0

(7.30.8.7) Comment

Coal is consumed entirely for clinker production in cement kilns. The reported figure of 1,483,756 MWh reflects consolidated consumption in 2024.

Oil

(7.30.8.1) Heating value

Select from:

☒ LHV

(7.30.8.2) Total MWh fuel consumed for cement production activities

5364

(7.30.8.3) MWh fuel consumed at the kiln

5364

(7.30.8.4) MWh fuel consumed for the generation of heat that is not used in the kiln

0

(7.30.8.7) Comment

Fuel oil is used in small amounts as a supplementary fuel in cement kilns. The reported value of 5,364 MWh reflects consolidated use in 2024

Gas

(7.30.8.1) Heating value

Select from:

☒ LHV

(7.30.8.2) Total MWh fuel consumed for cement production activities

0

(7.30.8.3) MWh fuel consumed at the kiln

0

(7.30.8.4) MWh fuel consumed for the generation of heat that is not used in the kiln

0

(7.30.8.7) Comment

Natural gas is not used.

Other non-renewable fuels (e.g. non-renewable hydrogen)

(7.30.8.1) Heating value

Select from:

☒ LHV

(7.30.8.2) Total MWh fuel consumed for cement production activities

1518014

(7.30.8.3) MWh fuel consumed at the kiln

0

(7.30.8.4) MWh fuel consumed for the generation of heat that is not used in the kiln

0

(7.30.8.7) Comment

Petroleum coke is consumed entirely for clinker production in cement kilns.

Total fuel

(7.30.8.2) Total MWh fuel consumed for cement production activities

3175367

(7.30.8.3) MWh fuel consumed at the kiln

3175367

(7.30.8.4) MWh fuel consumed for the generation of heat that is not used in the kiln

0

(7.30.8.7) Comment

The total fuel consumption value represents the sum of all reported fuel types (coal, petcoke, fuel oil, alternative fuels, and biomass) used in cement production activities. No natural gas or other renewable fuels were consumed during the reporting period.

[Fixed row]

(7.30.9) Provide details on the electricity, heat, steam, and cooling your organization has generated and consumed in the reporting year.

Electricity

(7.30.9.1) Total Gross generation (MWh)

48099

(7.30.9.2) Generation that is consumed by the organization (MWh)

48099

(7.30.9.3) Gross generation from renewable sources (MWh)

48099

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

48099

Heat

(7.30.9.1) Total Gross generation (MWh)

0

(7.30.9.2) Generation that is consumed by the organization (MWh)

0

(7.30.9.3) Gross generation from renewable sources (MWh)

0

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

0

Steam

(7.30.9.1) Total Gross generation (MWh)

0

(7.30.9.2) Generation that is consumed by the organization (MWh)

0

(7.30.9.3) Gross generation from renewable sources (MWh)

0

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

0

Cooling

(7.30.9.1) Total Gross generation (MWh)

0

(7.30.9.2) Generation that is consumed by the organization (MWh)

0

(7.30.9.3) Gross generation from renewable sources (MWh)

0

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

0

[Fixed row]

(7.30.10) Provide details on the electricity and heat your organization has generated and consumed for cement production activities.

	Total gross generation (MWh) inside the cement sector boundary	Generation that is consumed (MWh) inside the cement sector boundary
Electricity	48099	48099
Heat	0	0
Steam	0	0

[Fixed row]

(7.30.14) Provide details on the electricity, heat, steam, and/or cooling amounts that were accounted for at a zero or near-zero emission factor in the market-based Scope 2 figure reported in 7.7.

Row 1

(7.30.14.1) Country/area

Select from:

☒ Turkey

(7.30.14.2) Sourcing method

Select from:

☒ Default delivered electricity from the grid (e.g. standard product offering by an energy supplier), supported by energy attribute certificates

(7.30.14.3) Energy carrier

Select from:

☒ Electricity

(7.30.14.4) Low-carbon technology type

Select from:

☒ Hydropower (capacity unknown)

(7.30.14.5) Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)

167773.58

(7.30.14.6) Tracking instrument used

Select from:

☒ Contract

(7.30.14.7) Country/area of origin (generation) of the low-carbon energy or energy attribute

Select from:

☒ Turkey

(7.30.14.8) Are you able to report the commissioning or re-powering year of the energy generation facility?

Select from:

☒ No

(7.30.14.10) Comment

Electricity is sourced from the national grid (TEİAŞ mix). Commissioning or re-powering year of individual renewable facilities is not available to the company
[Add row]

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

	Consumption of purchased electricity (MWh)	Consumption of self-generated electricity (MWh)
Turkey	100	100

[Fixed row]

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

Row 1

(7.45.1) Intensity figure

0.00022

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

2981975.92

(7.45.3) Metric denominator

Select from:

☒ unit total revenue

(7.45.4) Metric denominator: Unit total

13440205000

(7.45.5) Scope 2 figure used

Select from:

☒ Location-based

(7.45.6) % change from previous year

7

(7.45.7) Direction of change

Select from:

☒ Decreased

(7.45.8) Reasons for change

Select all that apply

☒ Other emissions reduction activities

☒ Change in revenue

(7.45.9) Please explain

In 2024, Batıçim achieved a significant decoupling of emissions from financial growth. While net revenue increased by approximately 30% compared to 2023, combined Scope 1 and 2 emissions decreased by 14.2%. This improvement is mainly attributable to efficiency gains in fuel use, increased use of alternative fuels, and energy-saving measures implemented across operations. As a result, the overall GHG emission intensity decreased from 0.0005 tCO₂e/million TL in 2023 to 0.00022 tCO₂e/million TL in 2024, corresponding to a 56% reduction in carbon intensity. This outcome demonstrates the company's ability to grow its business while reducing its carbon footprint, in alignment with its long-term decarbonization strategy.
[Add row]

(7.47) State your organization's Scope 1 and Scope 2 emissions intensities related to cement production activities.

	Gross Scope 1 emissions intensity, metric tons CO2e per metric ton	Net Scope 1 emissions intensity, metric tons CO2e per metric ton	Scope 2, location-based emissions intensity, metric tons CO2e per metric ton
Clinker	0.905	0.87	0.036
Cement equivalent	0.706	0.679	0.034
Cementitious products	0	0	0
Low-CO2 materials	0	0	0

[Fixed row]

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

Row 1

(7.52.1) Description

Select from:

☒ Other, please specify :Alternative Fuel Use Ratio

(7.52.2) Metric value

8.6

(7.52.3) Metric numerator

168233

(7.52.4) Metric denominator (intensity metric only)

1956198

(7.52.5) % change from previous year

408

(7.52.6) Direction of change

Select from:

☒ Increased

(7.52.7) Please explain

The sharp increase in the Alternative Fuel Use Ratio is primarily due to the substitution of fossil fuels (coal, petroleum coke, and fuel oil) with alternative fuels such as biomass, waste-derived fuels, and end-of-life tires in cement kilns. In 2023, the alternative fuel substitution rate was very limited, remaining close to 0.9%. By 2024, this figure had risen sharply to 4.7%, corresponding to a more than sixfold increase compared to the previous year (+400%). This improvement was made possible through investments in co-processing capacity, upgraded fuel-feeding systems, and strengthened supply chains for alternative fuels. As of 2024, the total alternative fuel usage rate in waste-burning furnaces at both of our factories has reached 8.6%. The 2024 performance highlights Batıçim's accelerated progress in decarbonization and circular economy practices, significantly reducing reliance on fossil fuels while enabling the productive use of residual biomass and non-recyclable waste. Compared to 2023, this increase in substitution avoided tens of thousands of tons of CO₂e emissions, directly contributing to Scope 1 reduction targets and positioning the company ahead in its low-carbon transition roadmap.

Row 2

(7.52.1) Description

Select from:

☒ Other, please specify :Renewable Energy Share

(7.52.2) Metric value

45.33

(7.52.3) Metric numerator

167773,6

(7.52.4) Metric denominator (intensity metric only)

(7.52.5) % change from previous year

3.43

(7.52.6) Direction of change

Select from:

☒ Increased**(7.52.7) Please explain**

In 2024, Batıçim's renewable electricity share increased to 45.3% of total consumption, compared to 41.9% in 2023. This improvement reflects the company's ongoing efforts to align with national grid decarbonization trends and to increase reliance on renewable sources. Although the absolute renewable electricity consumption decreased slightly in parallel with lower total electricity demand, the relative share of renewables in Batıçim's energy mix increased. This indicates a structural shift toward cleaner electricity sourcing, independent of production fluctuations. By focusing on the renewable share rather than absolute volumes, Batıçim demonstrates progress in decarbonizing its energy supply, in line with the GHG Protocol Scope 2 Guidance and CDP best practices.

*[Add row]***(7.53) Did you have an emissions target that was active in the reporting year?**

Select all that apply

☒ Intensity target**(7.53.2) Provide details of your emissions intensity targets and progress made against those targets.****Row 1****(7.53.2.1) Target reference number**

Select from:

☒ Int 1**(7.53.2.2) Is this a science-based target?**

Select from:

☒ No, but we anticipate setting one in the next two years

(7.53.2.5) Date target was set

12/31/2023

(7.53.2.6) Target coverage

Select from:

☒ Business activity

(7.53.2.7) Greenhouse gases covered by target

Select all that apply

☒ Carbon dioxide (CO₂)

(7.53.2.8) Scopes

Select all that apply

☒ Scope 1

☒ Scope 2

(7.53.2.9) Scope 2 accounting method

Select from:

☒ Location-based

(7.53.2.11) Intensity metric

Select from:

☒ Metric tons CO₂e per metric ton of cement

(7.53.2.12) End date of base year

12/30/2024

(7.53.2.13) Intensity figure in base year for Scope 1

0.905

(7.53.2.14) Intensity figure in base year for Scope 2

0.036

(7.53.2.33) Intensity figure in base year for all selected Scopes

0.9410000000

(7.53.2.34) % of total base year emissions in Scope 1 covered by this Scope 1 intensity figure

100

(7.53.2.35) % of total base year emissions in Scope 2 covered by this Scope 2 intensity figure

100

(7.53.2.54) % of total base year emissions in all selected Scopes covered by this intensity figure

100

(7.53.2.55) End date of target

12/30/2030

(7.53.2.56) Targeted reduction from base year (%)

3.8

(7.53.2.57) Intensity figure at end date of target for all selected Scopes

0.9052420000

(7.53.2.58) % change anticipated in absolute Scope 1+2 emissions

3.9

(7.53.2.60) Intensity figure in reporting year for Scope 1

0.87

(7.53.2.61) Intensity figure in reporting year for Scope 2

0.034

(7.53.2.80) Intensity figure in reporting year for all selected Scopes

0.9040000000

(7.53.2.81) Land-related emissions covered by target

Select from:

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

(7.53.2.82) % of target achieved relative to base year

103.47

(7.53.2.83) Target status in reporting year

Select from:

☒ New

(7.53.2.85) Explain target coverage and identify any exclusions

“In 2024, the company achieved an emissions intensity of 0.904 tCO₂e per ton of clinker (Scope 1+2), compared to the base year intensity of 0.941 tCO₂e per ton of clinker. This corresponds to a reduction of 3.9%, slightly exceeding the targeted reduction of 3.8%, with a target achievement rate of 103.4%. The improvement was primarily driven by efficiency measures in clinker production, increased use of alternative fuels, and renewable electricity sourcing.”

(7.53.2.86) Target objective

Emissions reduction through energy efficiency and increased use of alternative fuels.

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

Our plan to achieve the intensity reduction target includes increasing the share of alternative fuels (biomass and waste-derived fuels), improving energy efficiency in clinker and cement production processes, and expanding the use of renewable electricity. By the end of the reporting year, we achieved measurable progress, including an increase in the alternative fuel usage rate and a higher share of renewable energy consumption, resulting in a decrease in Scope 1 and Scope 2 emissions intensity compared to the base year

(7.53.2.88) Target derived using a sectoral decarbonization approach

Select from:

☒ No

[Add row]

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

Select all that apply

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

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

Row 1

(7.54.1.1) Target reference number

Select from:

☒ Low 1

(7.54.1.2) Date target was set

12/31/2022

(7.54.1.3) Target coverage

Select from:

☒ Organization-wide

(7.54.1.4) Target type: energy carrier

Select from:

☒ Electricity

(7.54.1.5) Target type: activity

Select from:

☒ Consumption

(7.54.1.6) Target type: energy source

Select from:

☒ Renewable energy source(s) only

(7.54.1.7) End date of base year

12/30/2023

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

370116

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

45.33

(7.54.1.10) End date of target

12/30/2030

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

40

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

45.33

(7.54.1.13) % of target achieved relative to base year

0.00

(7.54.1.14) Target status in reporting year

Select from:

☒ Achieved

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

yes, Our net-zero commitment by 2053 is directly supported by our energy transition strategy. The transition to low-carbon and energy-efficient production processes is an integral part of our overall emissions reduction pathway. By increasing the use of renewable electricity, enhancing energy efficiency in clinker and cement production, and substituting fossil fuels with alternative and biogenic fuels, we aim to significantly reduce Scope 1 and Scope 2 emissions. These actions are not separate from, but fully embedded within, our emissions reduction targets, ensuring alignment with both our corporate net-zero roadmap and national decarbonization objectives.

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

Select all that apply

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

(7.54.1.19) Explain target coverage and identify any exclusions

The target covers Scope 1 and Scope 2 emissions across all operations of Batıçim, including clinker and cement production facilities, as well as electricity consumption from the grid. No major exclusions are applied, except for emissions from minor administrative activities which are considered immaterial to the overall footprint. The target is designed to capture the most emission-intensive parts of our operations.

(7.54.1.20) Target objective

The objective of the target is to reduce CO₂ emissions intensity per ton of cement produced, in line with our net-zero 2053 roadmap. This will be achieved through energy efficiency improvements, transition to low-carbon electricity, and increasing the share of alternative and biogenic fuels. The target supports both corporate decarbonization commitments and the national low-carbon transition agenda.

[Add row]

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

Select from:

☒ Yes

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

	Number of initiatives	Total estimated annual CO ₂ e savings in metric tonnes CO ₂ e
Under investigation	0	`Numeric input
To be implemented	0	`Numeric input
Implementation commenced	0	`Numeric input
Implemented	13	6281

[Fixed row]

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

Row 1

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in buildings

☒ Maintenance program

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

11.69

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

Select all that apply

☒ Scope 2 (location-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

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

58212

(7.55.2.7) Payback period

Select from:

☒ 4-10 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☒ 11-15 years

(7.55.2.9) Comment

Optimization of BTC ÇD4 gravel conveyor fan has been implemented, resulting in reduced electricity consumption and lower CO₂ emissions.

Row 2

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in buildings

☒ Maintenance program

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

14.6

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

Select all that apply

☒ Scope 2 (location-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

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

72765

(7.55.2.7) Payback period

Select from:

☒ 4-10 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☒ 11-15 years

(7.55.2.9) Comment

Optimization of the water supply fan in BTC ÇD4 unit reduced energy use and improved efficiency

Row 3

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in buildings

☒ Maintenance program

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

113.7

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

Select all that apply

☒ Scope 2 (location-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

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

710266

(7.55.2.7) Payback period

Select from:

☒ 4-10 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☒ 11-15 years

(7.55.2.9) Comment

Installation of a driver for BTS DF1 flame tube ambient air blower optimized operation and reduced energy demand

Row 4

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in buildings

☒ Maintenance program

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

61.4

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

Select all that apply

☒ Scope 2 (location-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

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

346641

(7.55.2.7) Payback period

Select from:

☒ 1-3 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☒ 16-20 years

(7.55.2.9) Comment

Optimization of BTS outdoor lighting system decreased electricity consumption and contributed to emission reductions

Row 5

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in buildings

☒ Maintenance program

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

159.76

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

Select all that apply

☒ Scope 2 (location-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

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

935194

(7.55.2.7) Payback period

Select from:

☒ 4-10 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☒ 11-15 years

(7.55.2.9) Comment

Optimization of BTS Line 1 technological pool cooling tower enhanced efficiency and reduced power consumption

Row 6

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in buildings

☒ Maintenance program

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

7.14

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

Select all that apply

☒ Scope 2 (location-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

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

1003622

(7.55.2.7) Payback period

Select from:

☒ 1-3 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☒ 3-5 years

(7.55.2.9) Comment

Energy efficiency project reduced pump/fan load and contributed to energy savings.

Row 7

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in buildings

☒ Maintenance program

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

3441

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

Select all that apply

☒ Scope 2 (location-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

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

24471181

(7.55.2.7) Payback period

Select from:

☒ 1-3 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☒ 11-15 years

(7.55.2.9) Comment

Optimization of compressed air system minimized leakages and reduced energy losses.

Row 8

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in buildings

☒ Maintenance program

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

843

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

Select all that apply

☒ Scope 2 (location-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

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

27761101

(7.55.2.7) Payback period

Select from:

☒ 4-10 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☒ 11-15 years

(7.55.2.9) Comment

Process optimization improved thermal energy efficiency, reducing both costs and emissions.

[Add row]

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

Row 1

(7.55.3.1) Method

Select from:

☒ Compliance with regulatory requirements/standards

(7.55.3.2) Comment

Our organization drives investment in emissions reduction activities by integrating financial, regulatory, and strategic drivers into our decision-making processes. Being part of a highly energy-intensive industry, we recognize that reducing emissions is not only an environmental responsibility but also a business necessity under frameworks such as the EU Emissions Trading System (ETS) and the upcoming Carbon Border Adjustment Mechanism (CBAM). These mechanisms create direct financial implications for our operations, and therefore we prioritize projects that both mitigate carbon risks and strengthen competitiveness baticim-tsrs-tr (1). To guide our investment decisions, we utilize internal carbon pricing scenarios. While there is not yet a mandatory domestic carbon price, we include notional carbon costs (e.g., \$10/ton CO₂e) into our economic assessments of energy efficiency and alternative fuel projects. This allows us to simulate the financial impact of future regulations and prioritize investments such as Waste Heat Recovery power plants or Refuse-Derived Fuel facilities, which both lower energy costs and reduce emissions intensity baticim-tsrs-tr (1). Our investment approach combines short-term low-capex measures (e.g., fan, lighting, and process optimizations) with long-term strategic infrastructure projects. These are evaluated through ROI, payback periods, and life-cycle carbon abatement potential. In particular, large-scale projects like alternative fuel substitution and waste heat recovery are prioritized because they deliver structural emission reductions and long-term cost savings. In parallel, smaller operational improvements are financed through annual budgets, ensuring continuous progress. Governance plays a critical role: sustainability objectives are embedded into corporate OKRs, and strategic goals are cascaded from top management to departments, ensuring alignment across operations and finance baticim-tsrs-tr (1). This cross-functional governance model ensures that sustainability is not treated as a separate agenda but as an integrated investment priority. Finally, achieved savings are systematically reinvested into new projects, creating a closed-loop funding mechanism. This guarantees that our emissions reduction pathway remains financially sustainable while preparing the company for future regulatory and market challenges.

[Add row]

(7.64) Disclose your organization's best available techniques as a percentage of Portland cement clinker production capacity.

	Total production capacity coverage (%)
4+ cyclone preheating	50
Pre-calciner	50

[Fixed row]

(7.74) Do you classify any of your existing goods and/or services as low-carbon products?

Select from:

☒ Yes

(7.74.1) Provide details of your products and/or services that you classify as low-carbon products.

Row 1

(7.74.1.1) Level of aggregation

Select from:

☒ Product or service

(7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:

☒ No taxonomy used to classify product(s) or service(s) as low carbon

(7.74.1.3) Type of product(s) or service(s)

Other

☒ Other, please specify :Low-carbon cement and concrete products

(7.74.1.4) Description of product(s) or service(s)

Batiçim classifies its low-carbon products as cement and concrete solutions developed with reduced clinker content, alternative raw materials, and circular economy practices. By substituting clinker with materials such as fly ash, slag, and other industrial by-products, the company significantly decreases the embedded CO₂ intensity of its products while promoting resource efficiency. In 2024, 71.8% of Batiçim's total sales and 73.8% of Batisöke's sales came from green products, preventing approximately 472,000 tonnes of CO₂ emissions, saving 69,000 tonnes of coal, 518,000 tonnes of clinker, and 37 million kWh of energy. These results demonstrate the dual benefit of reduced environmental footprint and enhanced economic value. Furthermore, the Waste to Value project ensures that waste streams are converted into valuable inputs, expanding the sustainable product portfolio and reinforcing supply chain resilience. Through dedicated R&D initiatives such as the ÜR-GE Kafası program, Batiçim continues to design next-generation low-carbon blended cements and innovative construction materials aligned with EU Taxonomy and international green building standards. This comprehensive approach underlines the company's commitment to delivering construction solutions that actively contribute to decarbonization, circular economy, and climate resilience in the building sector.

(7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

Select from:

☒ No

(7.74.1.13) Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year

71.8

[Add row]

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

Select from:

☒ No

C9. Environmental performance - Water security

(9.1) Are there any exclusions from your disclosure of water-related data?

Select from:

☒ No

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

Water withdrawals – total volumes

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Monthly

(9.2.3) Method of measurement

Water abstracted from wells is regularly monitored on a monthly basis across all our facilities. We use Oracle, the world's largest data management system, to record this data systematically, in coordination with the Environment and Maintenance Department. All of our wells hold valid groundwater utilization permits. Water drawn from the municipal network is monitored through IZSU meters and invoiced accordingly.

(9.2.4) Please explain

Water consumption is one of our main KPIs, monitored within the framework of ISO 14001. Responsibilities are clearly assigned to designated personnel, and performance is tracked monthly through a digital follow-up system, with results consolidated and reviewed quarterly. Annual ISO 14001 audits are carried out by an independent accredited body, ensuring transparency and compliance. In addition, corporate water reduction targets are defined and regularly reviewed, and progress toward these targets is integrated into management reporting processes. Governance is ensured by assigning oversight to senior management, making water management a strategic corporate priority that is embedded into our overall sustainability strategy.

Water withdrawals – volumes by source

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Monthly

(9.2.3) Method of measurement

Water abstracted from wells and the network is monitored through meters.

(9.2.4) Please explain

At the Batıçim İzmir plant, both well water and municipal water are used, while at the Batısöke plant and Batılman operations rely exclusively on well water. In Batibeton facilities, eight plants (Akhisar, Aydın, Balıkesir, Bornova, Gazıemir, Manisa, Milas, and Torbalı) utilize a mix of well water and municipal supply, whereas all remaining Batibeton facilities depend solely on wells. Across our operations, groundwater wells represent the dominant source of water abstraction, and each well operates under a valid utilization permit issued by the State Hydraulic Works (DSİ). This ensures that our withdrawals are fully compliant with national regulations, regularly monitored, and integrated into our sustainability management system, demonstrating our commitment to the responsible and lawful use of groundwater resources

Water withdrawals quality

(9.2.1) % of sites/facilities/operations

Select from:

☒ 76-99

(9.2.2) Frequency of measurement

Select from:

☒ Other, please specify :Every 2 months

(9.2.3) Method of measurement

In our cement plants, if the abstracted water is intended for potable use, it is first treated through a reverse osmosis unit, ensuring compliance with health and safety standards. Following treatment, accredited laboratories conduct analyses every two months for the water supplied to cafeterias and administrative buildings. To proactively manage risk, additional tests are performed every six months at the most distant points of the distribution network, serving as an early warning system against

(9.2.4) Please explain

The monitored parameters include pH, chloride, conductivity, total hardness, iron, nitrite, ammonium, aluminum, total colony count, Escherichia coli, enterococcus, Pseudomonas aeruginosa, and active chlorine. Together, these indicators provide a comprehensive assessment of water quality, covering chemical composition, mineral content, and microbiological safety. By monitoring both routine indicators and critical pathogens through accredited laboratories, we ensure that water quality consistently meets regulatory and health standards, safeguarding employees and communities while demonstrating our commitment to responsible water management

Water discharges – total volumes

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Monthly

(9.2.3) Method of measurement

Water discharges are systematically monitored through multiple independent records, including vacuum truck (sewage tanker) logs, organized industrial zone directorate registers, and İzsu (Water and Sewerage Administration) channel data. For all wastewater treatment plants, monitoring is based on the identity certificates issued by the Ministry of Environment and Urbanization, which verify compliance with national regulations. This multi-source verification approach ensures consistency

(9.2.4) Please explain

The wastewater generated across Batıçim and its subsidiaries is managed through a comprehensive and facility-specific approach. At concrete plants, industrial wastewater from pump and mixer washing is 100% reused in production after physical treatment, reducing freshwater demand. At cement plants, water is fully recirculated within the production process, meaning no wastewater is discharged. Domestic wastewater collected in septic tanks is tracked via vacuum truck records, while discharges into the İzsu sewer system are legally monitored through installed meters. Facilities in organized industrial zones are similarly monitored and invoiced by zone directorates. At the port, both domestic and industrial wastewater are treated through dedicated plants with a capacity of 50 m³/day, certified by the Ministry of Environment and Urbanization. In addition, analyses are conducted every two months by accredited laboratories in line with SKKY Table 21.1, ensuring compliance with standards

Water discharges – volumes by destination

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Monthly

(9.2.3) Method of measurement

Water discharge volumes are monitored through a multi-source verification system, combining vacuum truck records, organized industrial zone directorate registers, and İzsu (Water and Sewerage Administration) channel data. For all wastewater treatment plants, monitoring is further based on the official identity certificates issued by the Ministry of Environment and Urbanization, ensuring that volumes are tracked in full compliance with national regulations.

(9.2.4) Please explain

The wastewater of Batıçim and all its subsidiaries consists of domestic wastewater. At the concrete plants, industrial wastewater generated from pump and mixer washing is fully reused in production after physical treatment. In cement plants, water is recirculated within the production process, and therefore no wastewater is generated. Wastewater collected in septic tanks is monitored through vacuum truck records, while wastewater discharged into the İzsu sewer system is legally monitored through meters installed by İzsu. Concrete plants located in organized industrial zones are monitored through meters by the zone directorates and invoiced accordingly. At the port, both domestic and industrial wastewater treatment plants are in operation. The wastewater identity certificates approved by the Ministry of Environment and Urbanization specify a capacity of 50 m³/day for each. Analyses are conducted every two months by accredited laboratories, in accordance with SKKTable 21.1.

Water discharges – volumes by treatment method

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Monthly

(9.2.3) Method of measurement

Wastewater is monitored through vacuum truck records, organized industrial zone directorate records, and İzsu (Water and Sewerage Administration) channel records. For wastewater treatment plants, the basis is the wastewater treatment facility identity certificates issued by the Ministry of Environment and Urbanization.

(9.2.4) Please explain

The wastewater of Batıçim and all its subsidiaries consists of domestic wastewater. At the concrete plants, industrial wastewater generated from pump and mixer washing is fully reused in production after physical treatment. In cement plants, water is recirculated in the production process, and therefore no wastewater is generated. Wastewater collected in septic tanks is monitored through vacuum truck records, while wastewater discharged to the İzsu sewer system is analyzed every four months by an accredited body. Concrete plants located in organized industrial zones are monitored through meters by the zone directorates and invoiced accordingly. At the port, both domestic and industrial wastewater treatment plants are in operation. The wastewater identity certificates approved by the Ministry of Environment and Urbanization specify a capacity of 50 m³/day for each. Analyses are conducted every two months by accredited laboratories, in accordance with Table 21.1

Water discharge quality – by standard effluent parameters

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Other, please specify :Batiçim; every 4 months. Batılman; every 2 months. Batıbeton; every month

(9.2.3) Method of measurement

Treated domestic wastewater is analyzed periodically every four months at the Batiçim Izmir factory and every two months at Batılman. BOD, COD, TSS, and pH parameters are analyzed by an accredited laboratory. Industrial wastewater at Batılman is also analyzed periodically every two months by an accredited laboratory. COD, TSS, oil, grease, phosphorus, chromium, lead, cyanide, cadmium, iron, fluoride, copper, zinc, mercury, sulfur, total Kjeldahl Nitrogen, Fish Bioassay, pH and color.

(9.2.4) Please explain

The wastewater of Batiçim and all its subsidiaries consists of domestic wastewater. At the concrete plants, industrial wastewater generated from pump and mixer washing is fully reused in production after physical treatment. In cement plants, water is recirculated within the production process, and therefore no wastewater is generated. Wastewater collected in septic tanks is monitored through vacuum truck records, while wastewater discharged into the İzsu sewer system is analyzed every four months by an accredited body. Concrete plants located in organized industrial zones are monitored through meters by the zone directorates and invoiced accordingly. At the port, both domestic and industrial wastewater treatment plants are in operation. The wastewater identity certificates approved by the Ministry of Environment and Urbanization specify a capacity of 50 m³/day for each. Analyses are conducted every two months by accredited laboratories, in accordance with SKKK Table 21.1.

Water discharge quality – emissions to water (nitrates, phosphates, pesticides, and/or other priority substances)

(9.2.1) % of sites/facilities/operations

Select from:

☒ Not relevant

(9.2.4) Please explain

This aspect is not relevant for us because in our sites we do not cause any emissions to water.

Water discharge quality – temperature

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Other, please specify :Batiçim; every 4 months. Batılıman; every 2 months. Batibeton; every month

(9.2.3) Method of measurement

Monitoring is conducted through pH measurements, which also provide information on temperature, as well as through vacuum truck records, organized industrial zone directorate records, and İzsu (Water and Sewerage Administration) channel records. For wastewater treatment plants, the wastewater treatment facility identity certificates issued by the Ministry of Environment and Urbanization are taken as the basis. If it is required by the regulation, the temperature of discharge is monitored.

(9.2.4) Please explain

In our cement plants, if abstracted water is intended for potable use, it undergoes treatment through a reverse osmosis unit, ensuring compliance with health and safety standards. Following treatment, accredited laboratories conduct analyses every two months for the water supplied to cafeterias and administrative buildings. To strengthen risk management, additional tests are carried out every six months at the most distant points of the distribution network, serving as an early warning system against potential contamination along pipelines. This combination of advanced treatment, independent verification, and precautionary monitoring ensures that potable water consistently meets regulatory requirements and reflects our commitment to Leadership-level water stewardship.

Water consumption – total volume

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Monthly

(9.2.3) Method of measurement

Monitoring is carried out through vacuum truck records, organized industrial zone directorate records, and İzsu (Water and Sewerage Administration) channel records. For wastewater treatment plants, the wastewater treatment facility identity certificates issued by the Ministry of Environment and Urbanization are taken as the basis.

(9.2.4) Please explain

The wastewater of Batıçim and all its subsidiaries consists of domestic wastewater. At the concrete plants, industrial wastewater generated from pump and mixer washing is fully reused in production after physical treatment. In cement plants, water is recirculated within the production process, and therefore no wastewater is generated. Wastewater collected in septic tanks is monitored through vacuum truck records, while wastewater discharged into the İzsu sewer system is analyzed every four months by an accredited body. Concrete plants located in organized industrial zones are monitored through meters by the zone directorates and invoiced accordingly. At the port, both domestic and industrial wastewater treatment plants are in operation. The wastewater identity certificates approved by the Ministry of Environment and Urbanization specify a capacity of 50 m³/day for each. Analyses are carried out every two months by accredited laboratories, in accordance with Biological Treatment tables
[Fixed row]

(9.2.2) What are the total volumes of water withdrawn, discharged, and consumed across all your operations, how do they compare to the previous reporting year, and how are they forecasted to change?

Total withdrawals

(9.2.2.1) Volume (megaliters/year)

1580.99

(9.2.2.2) Comparison with previous reporting year

Select from:

☒ About the same

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

(9.2.2.4) Five-year forecast

Select from:

☒ Lower

(9.2.2.5) Primary reason for forecast

Select from:

☒ Investment in water-smart technology/process

(9.2.2.6) Please explain

In 2024, consolidated total withdrawals reached 1,580.99 ML, compared to 1,520.37 ML in 2023, an increase of 3.8%, which falls within the 0–10% range and is therefore considered “about the same.” Site-level measurements are also tracked: Batıçim İzmir recorded 533.66 ML, Batisöke 626.69 ML, and other subsidiaries 420.63 ML. All withdrawals are monitored monthly through a digital follow-up system, combining well water and municipal network data, supported by valid DSİ groundwater permits and municipal records. Over the next five years, a gradual decrease in total withdrawals is expected across all facilities, as efficiency projects and the water management framework are rolled out. Data are consolidated quarterly and reviewed by senior management, making water abstraction a strategic KPI integrated into our governance framework. This approach — tracking both consolidated and site-level performance, supported by digital monitoring and independent verification — ensures accuracy, transparency, and continuous progress toward long-term reduction targets.

Total discharges

(9.2.2.1) Volume (megaliters/year)

63.76

(9.2.2.2) Comparison with previous reporting year

Select from:

☒ About the same

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

(9.2.2.4) Five-year forecast

Select from:

☒ Lower

(9.2.2.5) Primary reason for forecast

Select from:

☒ Investment in water-smart technology/process

(9.2.2.6) Please explain

In 2024, consolidated water discharges totaled 63.76 ML, compared to 60.41 ML in 2023, an increase of 5.5%, which falls within the 0–10% range and is therefore considered “about the same.” At the site level, Batıçim İzmir discharged 15.59 ML, Batısöke 18.42 ML, and other subsidiaries 29.75 ML. Monitoring is conducted through vacuum truck records, İzsu sewer system meters, and organized industrial zone directorate registers, ensuring that both domestic and industrial wastewater are tracked in compliance with national regulations. Looking ahead, a gradual decrease in discharge volumes is expected in parallel with reductions in abstraction. This is supported by the implementation of a digital monitoring system and a comprehensive water efficiency management framework, which enable real-time tracking, improved operational control, and systematic reduction of water use. Results are consolidated quarterly and reviewed by senior management, making discharges a strategic performance indicator within our governance structure. This integrated approach ensures that efficiency gains translate directly into lower discharge levels, reinforcing our long-term commitment to resource conservation and sustainable water management.

Total consumption

(9.2.2.1) Volume (megaliters/year)

1409.1

(9.2.2.2) Comparison with previous reporting year

Select from:

☒ About the same

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

(9.2.2.4) Five-year forecast

Select from:

☒ Lower

(9.2.2.5) Primary reason for forecast

Select from:

☒ Investment in water-smart technology/process

(9.2.2.6) Please explain

In 2024, consolidated total consumption was 1,409.1 ML, compared to 1,343.5 ML in 2023, which is considered “about the same.” At the site level, Batıçim İzmir recorded 508.0 ML, Batisöke 590.99 ML, and other subsidiaries 310.98 ML. All consumption data are monitored through a digital tracking system that enables real-time measurement and control across all facilities. Over the next five years, we anticipate a gradual reduction in consumption, driven by the implementation of a comprehensive water efficiency management framework and continuous process optimization. By systematically improving operational efficiency and consolidating data monthly at the facility level and quarterly at the corporate level, consumption performance is reviewed by senior management as a strategic KPI under our ISO 14001 framework. This integrated approach ensures that reductions in consumption are directly linked to abstraction efficiency and discharge reduction, reinforcing our long-term commitment to natural resource conservation and sustainable water management.

[Fixed row]

(9.2.4) Indicate whether water is withdrawn from areas with water stress, provide the volume, how it compares with the previous reporting year, and how it is forecasted to change.

(9.2.4.1) Withdrawals are from areas with water stress

Select from:

☒ Yes

(9.2.4.2) Volume withdrawn from areas with water stress (megaliters)

1580.99

(9.2.4.3) Comparison with previous reporting year

Select from:

☒ About the same

(9.2.4.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

(9.2.4.5) Five-year forecast

Select from:

☒ Lower

(9.2.4.6) Primary reason for forecast

Select from:

☒ Investment in water-smart technology/process

(9.2.4.7) % of total withdrawals that are withdrawn from areas with water stress

100.00

(9.2.4.8) Identification tool

Select all that apply

☒ WRI Aqueduct

(9.2.4.9) Please explain

In 2024, 100% of our total withdrawals (1,580.99 ML) originated from areas identified as extremely high water stress (>80%) according to the WRI Aqueduct Water Risk Atlas. The geographic coordinates of each production site are entered into the tool and basin-level risks are analyzed, confirming consistency with the previous reporting year. Compared to 2023, our withdrawals increased by 3.8%, which falls within the 0–10% threshold and is therefore considered “about the same.” Over the next five years, a gradual decrease in withdrawals from stressed areas is expected, driven by the implementation of a digital monitoring system, our corporate water efficiency framework, and planned operational improvements. These data are reported monthly at the operational level, consolidated quarterly, and reviewed by senior management and the Sustainability Committee. In addition, results are disclosed in our IFRS sustainability reports, which explicitly integrate environmental

risks into financial disclosures and are subject to independent assurance. This governance approach ensures that water stress management is not only an operational KPI but also a strategic corporate priority, embedded into decision-making processes and financial risk analyses.
[Fixed row]

(9.2.7) Provide total water withdrawal data by source.

Fresh surface water, including rainwater, water from wetlands, rivers, and lakes

(9.2.7.1) Relevance

Select from:

☒ Not relevant

(9.2.7.5) Please explain

Our operations do not withdraw water from fresh surface water sources such as rivers, lakes, wetlands, or rainwater harvesting systems. All process and cooling water needs are met predominantly through groundwater and municipal supply systems located within the basin. Consequently, fresh surface water is not a relevant source for our operations, and no withdrawals are recorded from these sources.

Brackish surface water/Seawater

(9.2.7.1) Relevance

Select from:

☒ Not relevant

(9.2.7.5) Please explain

Our operations are located inland and do not have access to brackish surface water or seawater. Consequently, no water is withdrawn from these sources, making them not relevant for our activities.

Groundwater – renewable

(9.2.7.1) Relevance

Select from:

☒ Not relevant

(9.2.7.5) Please explain

Although renewable aquifers exist in certain regions, our facilities do not withdraw from renewable groundwater sources. Instead, water demand is supplied through non-renewable aquifers and municipal sources. Therefore, renewable groundwater is considered not relevant for our operation

Groundwater – non-renewable

(9.2.7.1) Relevance

Select from:

☒ Relevant

(9.2.7.2) Volume (megaliters/year)

1507.48

(9.2.7.3) Comparison with previous reporting year

Select from:

☒ About the same

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

(9.2.7.5) Please explain

In 2024, total withdrawals from non-renewable groundwater amounted to 1,507.48 ML, compared to 1,462.28 ML in 2023. This represents an increase of approximately 3%, which falls within our defined threshold of 0–10% change. Therefore, it is reported as “about the same” compared with the previous reporting year. For forward-looking assessments, we apply the following thresholds: 0–10% change = about the same 10–20% change = lower/higher 20% change = much lower/much higher Based on these thresholds and current operational planning, non-renewable groundwater withdrawals are expected to remain about the same over the next five years, as no significant capacity expansions or major process changes affecting water demand are foreseen.

Produced/Entrained water

(9.2.7.1) Relevance

Select from:

☒ Not relevant

(9.2.7.5) Please explain

Our operations do not generate or rely on produced or entrained water. Therefore, this category is not applicable to our reporting boundary.

Third party sources

(9.2.7.1) Relevance

Select from:

☒ Relevant

(9.2.7.2) Volume (megaliters/year)

73.51

(9.2.7.3) Comparison with previous reporting year

Select from:

☒ Higher

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

(9.2.7.5) Please explain

While the majority of our water demand is met through onsite groundwater wells (non-renewable aquifers), we also utilize municipal water supplied by IZSU and organized industrial zone directorates, as well as tanker water in certain ready-mix concrete operations. In 2024, withdrawals from third-party sources totaled approximately 73,509 m³ (62,810 m³ municipal water and 10,699 m³ tanker water), compared to 58,088 m³ in 2023 (+26%) and 46,095 m³ in 2022 (+60% overall increase over three years). Although these volumes represent a relatively small share of total withdrawals, they show a gradual upward trend linked to expanded ready-mix concrete activity. All third-party withdrawals are monitored through our digital follow-up system and reported at both facility and consolidated levels. To ensure consistency and accountability, these data are disclosed in our IFRS sustainability reports, which undergo independent assurance and are reviewed by senior management

[Fixed row]

(9.2.8) Provide total water discharge data by destination.

Fresh surface water

(9.2.8.1) Relevance

Select from:

☒ Not relevant

(9.2.8.5) Please explain

It is not relevant because our wastewater is not discharged to any fresh surface water.

Brackish surface water/seawater

(9.2.8.1) Relevance

Select from:

☒ Not relevant

(9.2.8.5) Please explain

It is not relevant because our wastewater is not discharged to any brackish surface water or seawater.

Groundwater

(9.2.8.1) Relevance

Select from:

☒ Not relevant

(9.2.8.5) Please explain

It is not relevant because wastewater is not discharged to any groundwater.

Third-party destinations

(9.2.8.1) Relevance

Select from:

☒ Relevant

(9.2.8.2) Volume (megaliters/year)

63.76

(9.2.8.3) Comparison with previous reporting year

Select from:

☒ About the same

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

(9.2.8.5) Please explain

In 2024, total water discharges amounted to 63.76 ML, compared to 60.41 ML in 2023, an increase of 5.5%, which falls within the 0–10% threshold and is therefore considered “about the same.” Site-level results were: Batıçim İzmir 15.59 ML, Batisöke 18.42 ML, and other subsidiaries 29.75 ML. All wastewater is discharged exclusively to third-party systems (municipal sewer, organized industrial zones, or licensed facilities); no direct discharges occur to natural water bodies. Monitoring is

carried out through IZSU meters, OSB directorate records, and vacuum truck logs, with analyses conducted by accredited laboratories. To ensure consistency with global water risk methodologies, the WRI Aqueduct Water Risk Atlas is used to assess basin-level risks, confirming that all our facilities are located in extremely high (>80%) water-stressed regions. Importantly, all water-related data (withdrawals, consumption, discharges) are consolidated quarterly and reviewed by senior management
[Fixed row]

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

Tertiary treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☒ Not relevant

(9.2.9.6) Please explain

All of our facilities comply with the Water Pollution Control Regulation, and therefore tertiary treatment is not required

Secondary treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☒ Relevant

(9.2.9.2) Volume (megaliters/year)

15

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☒ About the same

(9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☒ Maximum potential volume reduction already achieved

(9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

☒ Less than 1%

(9.2.9.6) Please explain

At our Batiliman facility, we operate both a 50 m³/day domestic wastewater treatment plant and a 50 m³/day industrial wastewater treatment plant, making groundwater management and treatment a central priority since non-renewable aquifers are our primary process water source. In 2024, the total treated volume reached 15 ML, remaining stable compared to the previous reporting year. Wastewater from ships and domestic activities is treated through a biological system, while bilge water collected from ships undergoes oil separation, chemical treatment, and sand filtration prior to safe discharge into the sea. These treatment plants are operated at full capacity and in full compliance with the Water Pollution Control Regulation, ensuring regulatory conformity and minimizing environmental risks. All treatment volumes are tracked through a digital monitoring system, analyzed periodically by accredited laboratories, and reviewed by senior management and the Sustainability Committee. Results are also disclosed in our IFRS sustainability reports, reinforcing wastewater treatment as both an environmental safeguard and a financial risk factor. This integrated approach ensures resilience in regions identified as extremely high water stress (>80%) by the WRI Aqueduct Water Risk Atlas, aligning operational performance with long-term sustainability goals.

Primary treatment only

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☒ Relevant

(9.2.9.2) Volume (megaliters/year)

80.79

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☒ About the same

(9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

(9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

☒ Less than 1%

(9.2.9.6) Please explain

At Batibeton facilities, physical treatment systems are in place. Industrial wastewater generated from site operations, pump cleaning, and transit mixer washing is directed to sedimentation ponds. After settling, clarified water is recovered and reused in production processes. The recovered volumes are automatically tracked and recorded through the Oracle system, ensuring data accuracy and supporting water efficiency monitoring.

Discharge to the natural environment without treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☒ Not relevant

(9.2.9.6) Please explain

We do not discharge to the natural environment without treatment so it is not relevant.

Discharge to a third party without treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☒ Relevant

(9.2.9.2) Volume (megaliters/year)

48.76

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☒ About the same

(9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

(9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

☒ Less than 1%

(9.2.9.6) Please explain

Domestic wastewater is discharged either into the licensed municipal sewage network or transported by vacuum trucks to authorized municipal wastewater treatment plants. The reported discharge volume was 45.41 m³ in 2023 and 48.76 m³ in the current reporting year. This represents a change of less than 10% and is therefore classified as “about the same” compared with the previous reporting year.

Other

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☒ Not relevant

(9.2.9.6) Please explain

We do not have any other treatment so it is not relevant.

[Fixed row]

(9.3) In your direct operations and upstream value chain, what is the number of facilities where you have identified substantive water-related dependencies, impacts, risks, and opportunities?

Direct operations

(9.3.1) Identification of facilities in the value chain stage

Select from:

☒ Yes, we have assessed this value chain stage and identified facilities with water-related dependencies, impacts, risks, and opportunities

(9.3.2) Total number of facilities identified

24

(9.3.3) % of facilities in direct operations that this represents

Select from:

☒ 100%

(9.3.4) Please explain

Our operations consist of 24 facilities: two cement plants (Batıçim İzmir and Batisöke), one port operation (Batiliman), and 22 ready-mix concrete plants managed collectively under Batibeton. Across all facilities, water consumption is systematically monitored, targets are set, and performance is tracked through our digital follow-up system, consolidating data monthly at the facility level and quarterly at the corporate level. All facilities are located in regions classified as extremely high water stress (>80%) by the WRI Aqueduct Water Risk Atlas, reinforcing the strategic importance of water management. Consequently, we are actively implementing water recovery and reuse projects, supported by efficiency improvements in both cement and ready-mix operations. Water-related data (withdrawals, consumption, discharges) are reviewed by senior management and the Sustainability Committee and disclosed in our IFRS sustainability reports, which undergo independent assurance. This ensures that water management is treated not only as an environmental KPI but as a strategic and financial risk factor, directly influencing long-term resilience.

Upstream value chain

(9.3.1) Identification of facilities in the value chain stage

Select from:

☒ Yes, we have assessed this value chain stage and identified facilities with water-related dependencies, impacts, risks, and opportunities

(9.3.2) Total number of facilities identified

48

(9.3.4) Please explain

Out of the 63 suppliers reviewed, 48 (76%) are located in the same regions as our facilities. We conducted water-related risk assessments with all of them, focusing on potential dependencies, impacts, and risks arising from supplier operations within the same basins. The assessment covered water availability, quality, and basin-level water stress, using the WRI Aqueduct Water Risk Atlas to ensure methodological consistency across our value chain. Findings are integrated into our supplier engagement and procurement processes, with results reviewed by the Sustainability Committee as part of our broader risk management framework. This integrated approach enables us to identify shared risks and opportunities, strengthen basin-level resilience, and align supplier performance with our corporate water stewardship goals.

[Fixed row]

(9.3.1) For each facility referenced in 9.3, provide coordinates, water accounting data, and a comparison with the previous reporting year.

Row 1

(9.3.1.1) Facility reference number

Select from:

☒ Facility 1

(9.3.1.2) Facility name (optional)

BATIÇİM CEMENT PLANT

(9.3.1.3) Value chain stage

Select from:

☒ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

- ☒ Dependencies
- ☒ Impacts
- ☒ Risks
- ☒ Opportunities

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

- ☒ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Zimbabwe

- ☒ Other, please specify :Küçük menderes

(9.3.1.8) Latitude

38.456362

(9.3.1.9) Longitude

27.263922

(9.3.1.10) Located in area with water stress

Select from:

- ☒ Yes

(9.3.1.13) Total water withdrawals at this facility (megaliters)

533.66

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☒ About the same

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

532.99

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0.67

(9.3.1.21) Total water discharges at this facility (megaliters)

15.6

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☒ About the same

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

15.6

(9.3.1.27) Total water consumption at this facility (megaliters)

518.06

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ About the same

(9.3.1.29) Please explain

In 2024, total water consumption was 518,06 ML, about the same vs. 2023 (-4.2%). Withdrawals were 533.66 ML (532.99 ML non-renewable groundwater and 0.67 ML third-party); no surface-water withdrawals. Discharges totaled 15.60 ML, 100% to third-party systems (municipal/authorized facilities); no direct discharges to natural water bodies. Rainwater is used for auxiliary purposes and tracked separately; it is not counted as withdrawals. The difference between withdrawals–discharges and reported consumption reflects moisture bound in product, inventory changes, and process evaporation. Sub-metering, digital logging, and accredited laboratory analyses ensure data quality; results are reviewed quarterly by senior management/Sustainability Committee and disclosed in assured IFRS sustainability reports.

Row 2

(9.3.1.1) Facility reference number

Select from:

☒ Facility 2

(9.3.1.2) Facility name (optional)

BATISÖKE CEMENT PLANT

(9.3.1.3) Value chain stage

Select from:

☒ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☒ Dependencies

☒ Impacts

☒ Risks

☒ Opportunities

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☒ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Zimbabwe

☒ Other, please specify :Büyük menderes

(9.3.1.8) Latitude

37.770579

(9.3.1.9) Longitude

27.437337

(9.3.1.10) Located in area with water stress

Select from:

☒ Yes

(9.3.1.13) Total water withdrawals at this facility (megaliters)

626.7

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☒ About the same

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

626.7

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.21) Total water discharges at this facility (megaliters)

18.42

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☒ About the same

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

18.42

(9.3.1.27) Total water consumption at this facility (megaliters)

(9.3.1.28) Comparison of total consumption with previous reporting year*Select from:*☒ About the same**(9.3.1.29) Please explain**

In 2024, withdrawals were 626.70 ML (100% non-renewable groundwater). Discharges were 18.42 ML, all to third-party systems; no discharges to surface water or groundwater. Consumption was 608,28 ML, about the same vs. 2023 (<10%). Rainwater is harvested for non-process uses and tracked outside the withdrawals boundary. Any gap between withdrawals–discharges and reported consumption arises from product moisture, on-site inventory changes, and process losses. Monitoring uses sub-meters, automated recording, and accredited labs; performance is consolidated monthly and reviewed quarterly under our governance and assured IFRS disclosures.

Row 3**(9.3.1.1) Facility reference number***Select from:*☒ Facility 3**(9.3.1.2) Facility name (optional)**

BATIBETON CONCRETE PLANTS

(9.3.1.3) Value chain stage*Select from:*☒ Direct operations**(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility***Select all that apply*☒ Dependencies

- ☒ Impacts
- ☒ Risks
- ☒ Opportunities

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

- ☒ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Zimbabwe

- ☒ Other, please specify :Büyük menderes

(9.3.1.8) Latitude

38.456362

(9.3.1.9) Longitude

27.263922

(9.3.1.10) Located in area with water stress

Select from:

- ☒ Yes

(9.3.1.13) Total water withdrawals at this facility (megaliters)

420.64

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☒ About the same

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

347.8

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

72.84

(9.3.1.21) Total water discharges at this facility (megaliters)

325.11

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☒ About the same

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

14.74

(9.3.1.27) Total water consumption at this facility (megaliters)

405.9

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ About the same

(9.3.1.29) Please explain

This line aggregates 22 ready-mix plants. In 2024, withdrawals were 420.64 ML (347.80 ML non-renewable groundwater, 72.84 ML third-party). Discharges were 14.74 ML, all to third-party destinations; there are no direct discharges to natural water bodies. Consumption totaled 405.90 ML, about the same vs. 2023. Primary treatment via sedimentation/clarification enables recovery and reuse for washing/production; recovered volumes are tracked automatically (Oracle/digital) and verified by accredited laboratory sampling. Given operation in high-stress basins, efficiency and reuse projects are prioritized and reviewed quarterly by senior management and the Sustainability Committee.

[Add row]

(9.3.2) For the facilities in your direct operations referenced in 9.3.1, what proportion of water accounting data has been third party verified?

Water withdrawals – total volumes

(9.3.2.1) % verified

Select from:

☒ 76-100

(9.3.2.2) Verification standard used

It has been verified by an accredited third-party verification body in accordance with the TS EN ISO 14001:2015 Environmental Management Standard. Verification is performed by accredited independent bodies and laboratories, with utility and wastewater quality analyzed on a routine basis (every 2–4 months). Results are reported to relevant authorities (e.g. Ministry of Environment, İZSU) and included in our IFRS sustainability reports with independent assurance. This governance approach ensures the highest level of accuracy, transparency, and regulatory compliance.

Water withdrawals – volume by source

(9.3.2.1) % verified

Select from:

☒ 76-100

(9.3.2.2) Verification standard used

It has been verified by an accredited third-party verification body in accordance with the TS EN ISO 14001:2015 Environmental Management Standard. Verification is performed by accredited independent bodies and laboratories, with utility and wastewater quality analyzed on a routine basis (every 2–4 months). Results are reported to relevant authorities (e.g. Ministry of Environment, İZSU) and included in our IFRS sustainability reports with independent assurance. This governance approach ensures the highest level of accuracy, transparency, and regulatory compliance.

Water withdrawals – quality by standard water quality parameters

(9.3.2.1) % verified

Select from:

☒ 76-100

(9.3.2.2) Verification standard used

Utility water is analyzed every two months by an accredited laboratory. The results related to these quality parameters have been verified by an accredited third-party verification body in accordance with the TS EN ISO 14001:2015 Environmental Management Standard. Verification is performed by accredited independent bodies and laboratories, with utility and wastewater quality analyzed on a routine basis (every 2–4 months). Results are reported to relevant authorities (e.g. Ministry of

Environment, IZSU) and included in our IFRS sustainability reports with independent assurance. This governance approach ensures the highest level of accuracy, transparency, and regulatory compliance.

Water discharges – total volumes

(9.3.2.1) % verified

Select from:

☒ 76-100

(9.3.2.2) Verification standard used

Verification was carried out by an accredited independent body in line with the TS EN ISO 14001:2015 Environmental Management Standard. Verification is performed by accredited independent bodies and laboratories, with utility and wastewater quality analyzed on a routine basis (every 2–4 months). Results are reported to relevant authorities (e.g. Ministry of Environment, IZSU) and included in our IFRS sustainability reports with independent assurance. This governance approach ensures the highest level of accuracy, transparency, and regulatory compliance.

Water discharges – volume by destination

(9.3.2.1) % verified

Select from:

☒ 76-100

(9.3.2.2) Verification standard used

It has been verified by an accredited third-party verification body in accordance with the TS EN ISO 14001:2015 Environmental Management Standard. Verification is performed by accredited independent bodies and laboratories, with utility and wastewater quality analyzed on a routine basis (every 2–4 months). Results are reported to relevant authorities (e.g. Ministry of Environment, IZSU) and included in our IFRS sustainability reports with independent assurance. This governance approach ensures the highest level of accuracy, transparency, and regulatory compliance.

Water discharges – volume by final treatment level

(9.3.2.1) % verified

Select from:

☒ 76-100

(9.3.2.2) Verification standard used

It has been verified by an accredited third-party verification body in accordance with the TS EN ISO 14001:2015 Environmental Management Standard. Verification is performed by accredited independent bodies and laboratories, with utility and wastewater quality analyzed on a routine basis (every 2–4 months). Results are reported to relevant authorities (e.g. Ministry of Environment, İZSU) and included in our IFRS sustainability reports with independent assurance. This governance approach ensures the highest level of accuracy, transparency, and regulatory compliance.

Water discharges – quality by standard water quality parameters

(9.3.2.1) % verified

Select from:

☒ 76-100

(9.3.2.2) Verification standard used

At wastewater channel connections, analyses are conducted by İZSU and by an accredited laboratory every four months. At Batiliman, wastewater discharged into the sea is analyzed every two months by an accredited laboratory, and the results are submitted to the Ministry of Environment and Urbanization system. The Water Pollution Control Regulation standard is applied. Verification is performed by accredited independent bodies and laboratories, with utility and wastewater quality analyzed on a routine basis (every 2–4 months). Results are reported to relevant authorities (e.g. Ministry of Environment, İZSU) and included in our IFRS sustainability reports with independent assurance. This governance approach ensures the highest level of accuracy, transparency, and regulatory compliance. Verification is performed by accredited independent bodies and laboratories, with utility and wastewater quality analyzed on a routine basis (every 2–4 months). Results are reported to relevant authorities (e.g. Ministry of Environment, İZSU) and included in our IFRS sustainability reports with independent assurance. This governance approach ensures the highest level of accuracy, transparency, and regulatory compliance.

Water consumption – total volume

(9.3.2.1) % verified

Select from:

☒ 76-100

(9.3.2.2) Verification standard used

Verification was conducted by an accredited independent body in line with the TS EN ISO 14001:2015 Environmental Management Standard. Verification is performed by accredited independent bodies and laboratories, with utility and wastewater quality analyzed on a routine basis (every 2–4 months). Results are reported to relevant authorities (e.g. Ministry of Environment, İZSU) and included in our IFRS sustainability reports with independent assurance. This governance approach ensures the highest level of accuracy, transparency, and regulatory compliance.

[Fixed row]

(9.5) Provide a figure for your organization’s total water withdrawal efficiency.

(9.5.1) Revenue (currency)

13440205

(9.5.2) Total water withdrawal efficiency

8501.13

(9.5.3) Anticipated forward trend

Compared to last year, water abstraction rose 3.8% (“about the same”). Specific water use improved: Batıçim fell from 0.312 to 0.292 m³/ton (-6%) and Batısöke from 0.509 to 0.339 m³/ton (-33%). Targets are 0.28 m³/ton by 2030 and 0.25 m³/ton by 2053, equal to 10% and 45% cuts vs. 2022. Water is managed as a strategic priority, with progress tracked via digital systems, independent verification, and oversight by senior management.

[Fixed row]

(9.13) Do any of your products contain substances classified as hazardous by a regulatory authority?

	Products contain hazardous substances	Comment
	Select from:	Our products contain no hazardous substances.

	Products contain hazardous substances	Comment
	<input checked="" type="checkbox"/> No	

[Fixed row]

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

(9.14.1) Products and/or services classified as low water impact

Select from:

☒ Yes

(9.14.2) Definition used to classify low water impact

Our blended cement products consume less water compared to traditional clinker-intensive cement types. Additionally, by incorporating high-performance chemical admixtures in our concrete production processes, we are able to reduce the amount of water consumed per cubic meter of concrete by approximately 10–15 liters, without compromising concrete strength, workability, or durability. This approach supports water efficiency, reduces operational water dependency, and contributes to sustainable production practices.

(9.14.4) Please explain

Baticim's blended cement products with additives have a lower water footprint compared to ordinary Portland cement. The absence of water cooling requirements in production and the incorporation of mineral additives significantly reduce water use during manufacturing. Our low water impact cement portfolio includes: CEM II/A-M (PL) 42.5 R CEM II/B-M (LW) 42.5 R CEM II/C-M (LW) 42.5 N CEM IV/B (PW) 32.5 R In addition, by using high-performance chemical admixtures in ready-mixed concrete, Baticim reduces water consumption per cubic meter of concrete by approximately 10–15 liters, without compromising strength, durability, or workability

[Fixed row]

(9.15) Do you have any water-related targets?

Select from:

☒ Yes

(9.15.1) Indicate whether you have targets relating to water pollution, water withdrawals, WASH, or other water-related categories.

Water pollution

(9.15.1.1) Target set in this category

Select from:

☒ No, and we do not plan to within the next two years

(9.15.1.2) Please explain

All facilities comply with the Water Pollution Control Regulation; since all discharges are below legal limits and regularly monitored by accredited labs, no separate reduction target is set. Compliance with updated legislation, including the newly introduced Water Efficiency Regulation (Su Verimliliği Yönetmeliği), will continue to be ensured, requiring efficiency systems, monitoring, and reporting for sustainable water use

Water withdrawals

(9.15.1.1) Target set in this category

Select from:

☒ Yes

Water, Sanitation, and Hygiene (WASH) services

(9.15.1.1) Target set in this category

Select from:

☒ No, and we do not plan to within the next two years

(9.15.1.2) Please explain

all facilities provide 100% safe access to drinking water, sanitation, and hygiene (WASH) services for employees, fully aligned with national regulations and international standards (ILO, WHO). Services are regularly audited, with monitoring of water quality and hygiene conditions. Continuous improvement projects, such as greywater reuse for sanitation and employee awareness programs, strengthen resilience and ensure long-term compliance.

[Fixed row]

(9.15.2) Provide details of your water-related targets and the progress made.

Row 1

(9.15.2.1) Target reference number

Select from:

☒ Target 1

(9.15.2.2) Target coverage

Select from:

☒ Organization-wide (direct operations only)

(9.15.2.3) Category of target & Quantitative metric

Water withdrawals

☒ Reduction in withdrawals per unit of production

(9.15.2.4) Date target was set

12/31/2021

(9.15.2.5) End date of base year

12/30/2022

(9.15.2.6) Base year figure

0.31

(9.15.2.7) End date of target year

12/30/2030

(9.15.2.8) Target year figure

0.28

(9.15.2.9) Reporting year figure

0.29

(9.15.2.10) Target status in reporting year

Select from:

☒ Achieved

(9.15.2.11) % of target achieved relative to base year

67

(9.15.2.12) Global environmental treaties/initiatives/ frameworks aligned with or supported by this target

Select all that apply

☒ Sustainable Development Goal 6

☒ Other, please specify :IFRS Sustainability Standards, SASB Sector Standards

(9.15.2.13) Explain target coverage and identify any exclusions

The target coverage includes the Batıçim İzmir plant, as explained in our Sustainability Report (page 54). Other operations such as ready-mix concrete facilities and port activities are not included in this target. The target coverage includes all direct operations under Batıçim, specifically the İzmir and Batısöke cement plants, where water withdrawals are systematically measured and monitored. The target applies organization-wide for cement production activities. Ready-mix concrete facilities and port operations are not included in this specific target, as water withdrawals in these operations are comparatively minor and managed under separate monitoring systems.

(9.15.2.15) Actions which contributed most to achieving or maintaining this target

The water withdrawal target focuses on improving efficiency across all production facilities located in high water-stressed basins, as identified by the WRI Aqueduct tool. The target is monitored annually, with performance considered “about the same” if variation remains within $\pm 10\%$. In the reporting year, total withdrawal volumes were controlled through operational efficiency measures and increased reuse, supporting our long-term water stewardship commitments.

(9.15.2.16) Further details of target

The water withdrawal reduction target is part of our broader sustainability strategy and is fully aligned with national legislation on water efficiency and ISO 14001 environmental management requirements. The target was defined based on the 2022 baseline, when specific water consumption was 0.31 m³/ton cement equivalent. By 2030, we aim to reduce this to 0.28 m³/ton, and further to 0.25 m³/ton by 2053. This long-term ambition supports both regulatory compliance and our commitment to sustainable resource management in high water-stress areas, as identified by the WRI Aqueduct tool. The target is embedded within our operational planning, linked to efficiency projects, reuse initiatives, and continuous monitoring systems. Progress is reported annually in our Sustainability Report (see 2025 Report, p.54).

Row 2

(9.15.2.1) Target reference number

Select from:

☒ Target 2

(9.15.2.2) Target coverage

Select from:

☒ Organization-wide (direct operations only)

(9.15.2.3) Category of target & Quantitative metric

Water withdrawals

☒ Reduction in withdrawals per unit of production

(9.15.2.4) Date target was set

12/31/2021

(9.15.2.5) End date of base year

12/30/2022

(9.15.2.6) Base year figure

0.51

(9.15.2.7) End date of target year

12/30/2030

(9.15.2.8) Target year figure

0.28

(9.15.2.9) Reporting year figure

0.29

(9.15.2.10) Target status in reporting year

Select from:

☒ Achieved

(9.15.2.11) % of target achieved relative to base year

96

(9.15.2.12) Global environmental treaties/initiatives/ frameworks aligned with or supported by this target

Select all that apply

☒ Sustainable Development Goal 6

☒ Other, please specify :IFRS Sustainability Standards, SASB Sector Standards

(9.15.2.13) Explain target coverage and identify any exclusions

The target coverage includes the Batisöke cement plant, as explained in our Sustainability Report (page 54). This target focuses specifically on reducing water withdrawals per unit of production at the Batisöke facility, where withdrawals are systematically measured and monitored. Other operations such as ready-mix concrete facilities and port activities are not included in this target, as their water withdrawals are comparatively minor and are managed under separate monitoring systems.

(9.15.2.15) Actions which contributed most to achieving or maintaining this target

The water withdrawal target focuses on achieving efficiency in all production facilities located in high water-stressed basins, as identified by the WRI Aqueduct tool. The target is monitored annually, with performance considered 'about the same' if variation remains within $\pm 10\%$. For the reporting year, total withdrawal volumes were managed through operational efficiency measures and reuse, supporting long-term water stewardship goals

(9.15.2.16) Further details of target

This target applies to the Batisöke cement plant and focuses on reducing water withdrawals per unit of production. The baseline in 2022 was 0.51 m³/ton cement equivalent, and the target is to reach 0.28 m³/ton by 2030. The reporting year figure is 0.29 m³/ton, showing that significant progress has already been achieved (96% of the target relative to baseline). The target is aligned with our group-wide water stewardship strategy, national water efficiency legislation, and ISO 14001 requirements. Progress is supported by operational efficiency projects, process water recirculation, and reuse initiatives. Details are provided in the Sustainability Report (page 54).

[Add row]

C10. Environmental performance - Plastics

(10.1) Do you have plastics-related targets, and if so what type?

(10.1.1) Targets in place

Select from:

☒ Yes

(10.1.2) Target type and metric

Plastic packaging

☒ Reduce the total weight of plastic packaging used and/or produced

(10.1.3) Please explain

Our overall waste recovery rate is 99.63%. In line with our zero waste and circular economy approach, no single-use plastics are used in our canteens. In offices and common kitchen areas, all plastic cups and similar items have been completely eliminated. Additionally, individual under-desk bins have been removed, and centralized waste separation bins are placed in corridors. This system ensures that waste is separated at the source, and as a result, almost all generated waste is recovered and recycled..

[Fixed row]

(10.2) Indicate whether your organization engages in the following activities.

Production/commercialization of plastic polymers (including plastic converters)

(10.2.1) Activity applies

Select from:

☒ No

(10.2.2) Comment

Our company does not engage in the production or commercialization of plastic polymers. As a cement and ready-mix concrete producer, our operations are limited to cement manufacturing, ready-mix concrete production, and related construction materials. Additionally, we are committed to minimizing plastic use across our operations by eliminating single-use plastics in canteens and offices, and promoting waste recovery and recycling, with an overall recovery rate of 99.63%.

Production/commercialization of durable plastic goods and/or components (including mixed materials)

(10.2.1) Activity applies

Select from:

☒ No

(10.2.2) Comment

Our company does not produce or commercialize any durable plastic goods or components. Our core business activities are cement and ready-mix concrete production. Plastic materials are not part of our product portfolio

Usage of durable plastics goods and/or components (including mixed materials)

(10.2.1) Activity applies

Select from:

☒ No

(10.2.2) Comment

We do not use durable plastic goods or components in our operations. Instead, we focus on minimizing plastic use across offices and facilities, including the elimination of single-use plastics in canteens and kitchen

Production/commercialization of plastic packaging

(10.2.1) Activity applies

Select from:

☒ No

(10.2.2) Comment

Our operations do not involve the production or commercialization of plastic packaging. Packaging materials used in our supply chain are minimized and managed through recycling and waste reduction practices

Production/commercialization of goods/products packaged in plastics

(10.2.1) Activity applies

Select from:

☒ No

(10.2.2) Comment

We do not produce or sell goods packaged in plastics. As a cement and ready-mix concrete producer, our products are delivered in bulk or in paper bags. We actively avoid plastic packaging in our distribution processes

Provision/commercialization of services that use plastic packaging (e.g., food services)

(10.2.1) Activity applies

Select from:

☒ No

(10.2.2) Comment

Our company does not provide services involving plastic packaging. Furthermore, in our canteens and offices, single-use plastics have been eliminated and replaced with sustainable alternatives, in line with our waste reduction strategy.

Provision of waste management and/or water management services

(10.2.1) Activity applies

Select from:

☒ No

(10.2.2) Comment

Our company does not provide waste management or water management services to third parties. Waste and water management are limited to our internal operations and are managed in line with national regulations and sustainability goals

Provision of financial products and/or services for plastics-related activities

(10.2.1) Activity applies

Select from:

☒ No

(10.2.2) Comment

We do not provide financial products or services related to plastics. Our business activities are solely focused on cement and ready-mix concrete production

Other activities not specified

(10.2.1) Activity applies

Select from:

☒ No

(10.2.2) Comment

There are no other plastics-related activities outside the categories listed above. Our company's operations are exclusively related to cement and concrete production
[Fixed row]

C11. Environmental performance - Biodiversity

(11.2) What actions has your organization taken in the reporting year to progress your biodiversity-related commitments?

(11.2.1) Actions taken in the reporting period to progress your biodiversity-related commitments

Select from:

☒ Yes, we are taking actions to progress our biodiversity-related commitments

(11.2.2) Type of action taken to progress biodiversity- related commitments

Select all that apply

☒ Land/water protection

☒ Land/water management

☒ Education & awareness

[Fixed row]

(11.3) Does your organization use biodiversity indicators to monitor performance across its activities?

	Does your organization use indicators to monitor biodiversity performance?	Indicators used to monitor biodiversity performance
	<div>Select from:</div> <div><input checked="" type="checkbox"/> Yes, we use indicators</div>	<div>Select all that apply</div> <div><input checked="" type="checkbox"/> State and benefit indicators</div> <div><input checked="" type="checkbox"/> Response indicators</div>

[Fixed row]

(11.4) Does your organization have activities located in or near to areas important for biodiversity in the reporting year?

	Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity
Legally protected areas	Select from: <input checked="" type="checkbox"/> No
UNESCO World Heritage sites	Select from: <input checked="" type="checkbox"/> No
UNESCO Man and the Biosphere Reserves	Select from: <input checked="" type="checkbox"/> No
Ramsar sites	Select from: <input checked="" type="checkbox"/> No
Key Biodiversity Areas	Select from: <input checked="" type="checkbox"/> No
Other areas important for biodiversity	Select from: <input checked="" type="checkbox"/> No

[Fixed row]

C13. Further information & sign off

(13.1) Indicate if any environmental information included in your CDP response (not already reported in 7.9.1/2/3, 8.9.1/2/3/4, and 9.3.2) is verified and/or assured by a third party?

	Other environmental information included in your CDP response is verified and/or assured by a third party
	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(13.1.1) Which data points within your CDP response are verified and/or assured by a third party, and which standards were used?

Row 1

(13.1.1.1) Environmental issue for which data has been verified and/or assured

Select all that apply

- ☒ Climate change
- ☒ Water

(13.1.1.2) Disclosure module and data verified and/or assured

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

- ☒ Identification, assessment, and management processes

(13.1.1.3) Verification/assurance standard

Water-related standards

☒ Other water verification standard, please specify :Turkish Sustainability Reporting Standard assurance audit

Climate change-related standards

☒ ISO 14064-1

☒ ISO 14064-3

☒ Other climate change verification standard, please specify :Turkish Sustainability Reporting Standard assurance audit

(13.1.1.4) Further details of the third-party verification/assurance process

All data reported to CDP is fully aligned with the Turkish Sustainability Reporting Standards (TSRS). The TSRS sustainability report, which forms the basis of our disclosure, is subject to independent third-party limited assurance by Deloitte. The assurance process covers climate- and water-related data, including Scope 1, Scope 2, and relevant Scope 3 emissions, energy use, water withdrawal, discharge, and recycling metrics. The verification is conducted in line with ISAE 3000 and ISO 14064 standards, ensuring accuracy, consistency, and comparability of reported information. Assurance results are shared publicly through the TSRS report and submitted to CDP, thereby enhancing transparency and stakeholder confidence.

(13.1.1.5) Attach verification/assurance evidence/report (optional)

baticim-tsrs-tr (1).pdf

[Add row]

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

	Additional information	Attachment (optional)
	No additional information. Sustainability Report attached.	surdurebilirlik-raporu-2025.pdf

[Fixed row]

(13.3) Provide the following information for the person that has signed off (approved) your CDP response.

(13.3.1) Job title

Executive Board Member, Group Head - Operations

(13.3.2) Corresponding job category

Select from:

☒ Other C-Suite Officer

[Fixed row]

(13.4) Please indicate your consent for CDP to share contact details with the Pacific Institute to support content for its Water Action Hub website.

Select from:

☒ Yes, CDP may share our Disclosure Submission Lead contact details with the Pacific Institute

