



2024 Sustainability Report

# Resilience Through Energy Transition

Published on 22.09.2025

# 2024 SUSTAINABILITY HIGHLIGHTS



Domanic / Kütahya

## Sustainability

Took more actions in line with our Material Sustainability Targets under environment, social and governance titles

Continued regional corporate expansion plans in Europe to invest in and install new renewable energy capacity.

Organised regular webinars to increase sustainability awareness amongst internal stakeholders

Continued to work with subcommittees to support integration of sustainability in organisational processes, goals and actions

## Innovation

Increased efficiency of our renewable energy production operations with deployment of AI-supported power plant monitoring system, Ensoft

Worked with group company SustainTech VCIF to invest in innovation ventures supporting sustainability and climate technologies

## Collaborations

Collaborated with our stakeholder Twin Science in support of Naturel Holding Sustainable Schools Project

Collaborated with Koc University to support equality and inclusion in higher education

Expanded our horizons in international trade fairs and explored partnership and collaboration opportunities in innovative climate technologies

Increased supplier visits to discuss collaboration opportunities to improve supply chain sustainability

## Equality and Inclusion

Contributed to Naturel Holding Sustainable Schools project with Ankara Sehit Mehmet Cetin Primary School to support green energy transformation and STEM and sustainability education

Continued to support equality and inclusion in higher education with Anatolian Scholar Programme

Launched surveys to collect and include the feedbacks of internal and external stakeholders opinions on our performance, targets and strategy

## Transparency and Accountability

Continued ESG reporting on London Stock Exchange Group (LSEG) platform with ESG score of "A", a global ranking of 2nd in Renewable Energy and Equipment Sector and with a listing on BIST Sustainability Index

Improved our carbon footprint calculation by expanding our data set

Improved the design of Company Activity Report to improve communication with our stakeholders

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# ABOUT THE REPORT

This Sustainability Report has been prepared in accordance with the **Global Reporting Initiative (GRI) Standards 2021** and covers the environmental, social, and governance (ESG) performance of Naturel Yenilenebilir Enerji Ticaret A. Ş. ("Naturel Enerji" or the "Company") for the reporting period of **January 1 to December 31, 2024**.

Naturel Enerji publishes its sustainability reports annually. The Company issues financial reports, activity reports and sustainability principles compliance reports on a quarterly basis as per Capital Markets Board of Türkiye regulations and issues one comprehensive annual GRI standard sustainability report as a reference source for all its ESG reporting.

The report provides transparent and comprehensive information on the Company's material sustainability topics, goals, performance, and stakeholder engagement processes. Material issues were identified through a **Materiality Assessment** conducted in line with the GRI 3: Material Topics standard, and reflect the economic, environmental, and social impacts of our activities as well as the expectations of our stakeholders.

With its third sustainability report the Company aims to strengthen accountability and demonstrate progress toward its sustainability strategy and commitments, including alignment with the **United Nations Sustainable Development Goals (UN SDGs)**.

The scope of the report includes the operations of the Company, and its direct and indirect subsidiaries, which are detailed in the [Company Activity Report](#). Data presented in the report has been collected through internal reporting systems and validated by relevant departments. Where possible, comparative performance data and forward-looking statements are included. This sustainability report covers all subsidiaries of Naturel Enerji as explained in page 7 of Activity Report, in accordance with the consolidation principles applied in the company's financial statements. The exception to this rule is in the calculation of carbon emissions whereby the report states carbon emissions on an unconsolidated basis.

We welcome stakeholder feedback to enhance future reports and improve our sustainability performance. Please direct any questions, comments, or requests for further information to: [sustainability@naturelenerji.com.tr](mailto:sustainability@naturelenerji.com.tr).



# MESSAGES FROM MANAGEMENT

Chairman's Message

CEO's Message

CSO's Message



## CHAIRMAN'S MESSAGE



### Dear Stakeholders,

In a year marked by both rising urgency and growing ambition, **2024** stood as a turning point for the global and national sustainability agenda. As the world gathered at **COP29 in Baku**, leaders recommitted to bold climate finance and net-zero pathways, reaffirming that **energy transition must be equitable, accelerated, and resilient**. Sharing its Long-Term Climate Strategy at COP29, Türkiye, with its rich solar, wind and geothermal resources and increasing policy momentum, is also uniquely positioned to lead in this transformation.

The **World Economic Forum's Global Risks Report 2024** underscored the increasing urgency and priorities: **six of the top ten global risks are environmental**, with extreme weather and biodiversity loss dominating both short- and long-term concerns. As a climate technologies and renewable energy company, this reaffirms the importance of our mission—to meet global energy needs from renewable resources in line with our corporate values and principles of sustainability.

At home, the launch of **Türkiye Sustainability Reporting Standards (TSRS)** on January 1, 2024, marked an important step. We welcome this decision which enhances corporate accountability, further empowers investors in their decision making, and integrates sustainability into the heart of governance and risk frameworks. As a listed company in BIST Sustainability Index and publishing ESG reports at LSEG, we will also begin aligning with TSRS 1 and TSRS 2 in our reporting as of 2025.

As Türkiye and the world continue to navigate the challenges of climate vulnerability and economic transformation, the renewable energy sector is no longer a future opportunity—it is a **strategic imperative**. We remain committed to scaling innovation, engaging communities, and creating long-term value while contributing to **Türkiye's net-zero roadmap and energy independence**, as well as **global sustainability through energy transition**.

In 2025 and beyond, our focus will continue to be investing in new climate technologies, renewable energy projects at home and in international markets and supporting innovation through venture capital investments and partnerships.

Together –with our stakeholders– we are powering **Resilience Through Energy Transition**.

Thank you for your continued trust and support.  
Best regards,

**Yusuf Şenel**  
Chairman of the Board  
Naturel Enerji



# CEO'S MESSAGE



## Dear Stakeholders,

As we reflect on 2024, it is clear we are operating in a world that demands not only **climate ambition**, but also **climate action now**. From **COP29 in Baku**, where global leaders pushed for increased climate finance and net-zero clarity, to Türkiye's unveiling of its **2053 Net Zero Strategy**, the global message was unified: the energy transition must accelerate for **resilience**, and climate technologies companies must lead the way.

Being a climate technologies and renewable energy company, creating direct positive impact on the environment and sustainability with our main operations, we continue to take this message to the heart and make it operational every year.

In 2024, we continued to generate renewable energy and provided EPC services to work towards our target of increasing renewable generation capacity—driven by **solar invest-**

**ments aligned with Türkiye's target of 120GW by 2035**. We continued to add value with innovations in storage and digital monitoring. We assessed climate risks not only as challenges, but as drivers for innovation and resilience. This aligns with the **Global Risks Report 2024**, which highlights climate change related environmental risks as top global threats. For us, these risks are real and we are building the systems, partnerships, and culture to meet them head-on.

With this ambition in 2024, Naturel Enerji,

- expanded its horizons for **climotech technology and innovation**, taking part in global renewable energy fairs in Europe and US
- increased investment efforts in US and Europe, **set up companies and offices in new geographies** via its subsidiaries
- **increased sustainability integration** across the board in line with our sustainability and ESG targets

In an era defined by transformation, we are not only building the infrastructure of the future—we are building **trust, resilience, and value** for generations to come. I thank our teams and stakeholders for their unwavering commitment.

Together, we are powering more than energy. We are powering **resilience**.

Best regards

**Tolgay Benderli**  
Chief Executive Officer  
Naturel Enerji



## CSO'S MESSAGE



### Dear Stakeholders,

In 2024, the world faced a decisive inflection point. From the commitments made at **COP29 in Baku** to the growing urgency outlined in the **Global Risks Report**, one message has become clear: **sustainability is not a separate function—it is the foundation of resilience, competitiveness, and long-term value.**

Our operations— in renewable energy investments, production, new capacity installation, operating and maintenance of renewable energy plants— are not just enabling our energy transition; they are shaping and contributing to Türkiye's and global climate change efforts. As Türkiye accelerates toward its **2053 Net Zero goal**, our solutions must deliver not only climate benefit, but also **social inclusion and ecosystem sensitivity.**

As a climate technologies company, we do not see sustainability as compliance – we identify it as a corporate value and see it as a driver of our **purpose, our partnerships, and our performance.**

Each year, we target significant strides in embedding **sustainability principles across our operations and governance structures.**

Similarly, in 2024 we continued to improve our sustainable management systems, took actions in line with our material sustainability targets by:

- working on integrating sustainability KPI's into ERP system
- increasing our reporting standards in line with international practices
- developing Naturel Holding Sustainable Schools project launched in collaboration with our stakeholders

In 2025 and onwards, we will,

- align our systems with the newly launched Türkiye Sustainability Reporting Standards (TSRS) to launch our first TSRS reports
- aim to carry out our first double materiality assessment, marking a critical step toward transparent and meaningful ESG integration.

The path ahead is one of **interdependence and collaboration.** Climate technologies alone will not be enough unless they are supported by strong ethics, inclusive design, circular thinking, clear impact measurement, and sustainable value chain.

In 2025 and beyond, our priority is to make sustainability **inseparable** from business strategy—because we believe **sustainable competitiveness and growth can only be achieved with a strategy that integrates sustainability goals.**

Thank you for supporting our sustainability journey. We are proud to contribute to **resilience through energy transition and our sustainability goals.**

**Pinar Karaman**  
CSO  
Naturel Holding A.Ş.



# COMPANY PROFILE

About Naturel Enerji  
ESG Rating



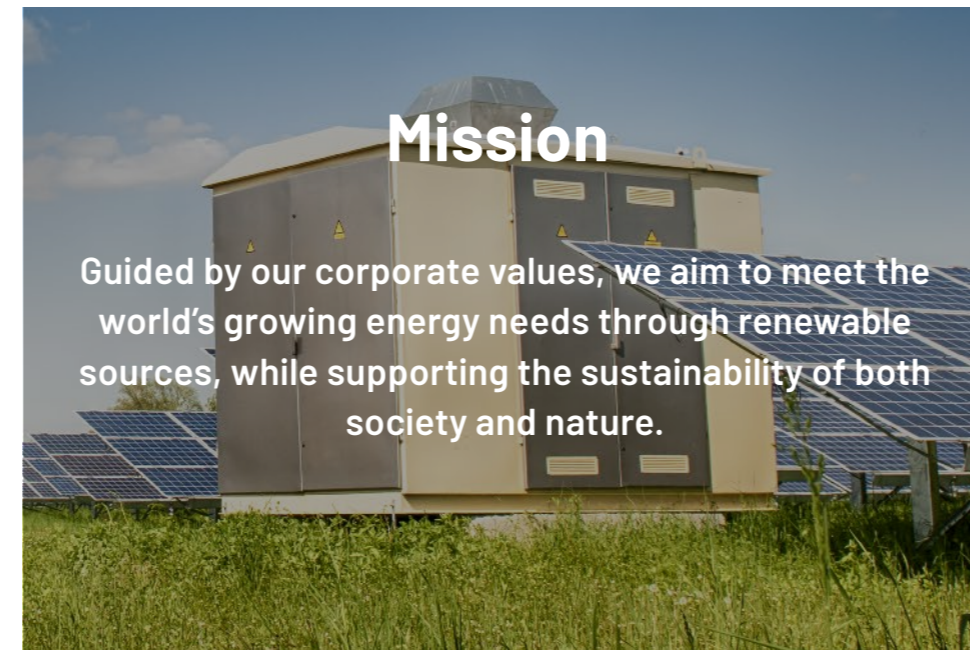
# ABOUT NATUREL ENERJİ

Founded in 2009, we are a climate technologies company operating in the renewable energy sector. We are engaged in the **generation of renewable energy, the provision of engineering, project development, and turnkey EPC services, as well as operation and maintenance (O&M) services** for renewable energy facilities. These activities are carried out across **Türkiye and international markets**, both through our direct operations and our **subsidiaries and affiliated companies**.

Headquartered in Ankara, with our primary operations based in Türkiye, our vision is to become a **trusted, leading, and stakeholder-focused global business partner** by delivering sustainable solutions in climate technologies and the renewable energy sector. We contribute to the **transition to a low-carbon economy** and prioritize sustainability, quality, and innovation across our value chain.

As of the end of 2024, we have invested in a total installed renewable energy capacity of **320 MWp**, encompassing **solar, wind, hydro, and geothermal power assets**.

For additional information regarding our history, milestones, Board members, economic performance, and economic and distributed value creation please refer to **Naturel Enerji 2024 Activity Report**.





# ESG RATING

## Leading sustainability integration

Naturel Enerji not only directly contributes to global sustainability with its core operations as a green energy company, but it also integrates sustainability into all its management systems in order to become more sustainable and create more positive impact for the planet and the people.

Naturel Enerji started reporting and sharing its actions on ESG criteria in LSEG platform in 2022. In 2023, the Company improved its ESG Scores to "A" and entered BIST Sustainability Index in 2023/2.

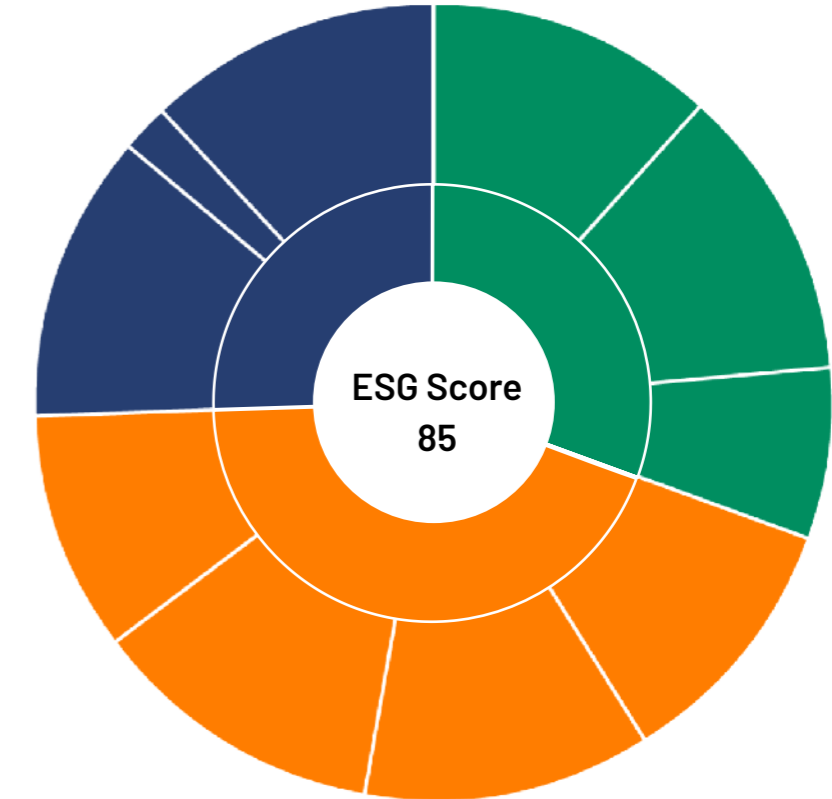
This was a result of many actions taken on the ESG criteria, showing the Company's commitment to sustainability.

**We are qualified to be included in the BIST Sustainability Index as of the second half of 2023.**

ENVIRONMENT	86
Emissions	99
Resource Use	98
Innovation	59

SOCIAL	90
Human Rights	87
Product Responsibility	98
Workforce	98
Community	82

GOVERNANCE	81
Management	97
Shareholders	16
CSR Strategy	98



As of 31.12.2023 LSEG reports.





# SUSTAINABILITY MANAGEMENT

Sustainability Management Approach

Sustainable Value Chain

Materiality Analysis

Key Insights from Materiality Analysis

# SUSTAINABILITY MANAGEMENT APPROACH

## Our Contribution to the Sustainable Development Goals (SDGs)

As part of our commitment to global sustainability, we directly support 11 United Nations Sustainable Development Goals. By aligning our corporate values with the principles of sustainable development and embedding the SDGs into our strategic objectives, we aim to create a lasting positive impact for both people and the planet.

## Sustainability Management Approach

Naturel Enerji integrates sustainability into the core of its business strategy and operational model, in alignment with the GRI Standards and global best practices. Our sustainability approach goes beyond compliance; it is embedded in our values—**sustainability, innovation, collaboration, equality and inclusion, transparency, and accountability.**

We contribute to sustainable development through our core business in climate technologies and renewable energy solutions. Our operational and strategic goals are mapped to 11 targeted SDGs, enabling measurable and goal-oriented action across our value chain.

We are integrating ESG (Environmental, Social, and Governance) principles into our corporate policies, management systems, and processes. This ensures that every decision we make is aligned with long-term sustainability outcomes.

To support robust sustainability governance:

- We established a **Sustainability Committee** in 2020 to guide and oversee sustainability strategy.
- Several **Subcommittees**—covering **Waste Management, Supply Chain Sustainability, Data Management, Reporting, Environment, Innovation, and Occupational Health & Safety**—report directly to the CEO and Executive Committee.
- These bodies ensure cross-functional implementation, monitoring, and continuous improvement of our sustainability goals.

In accordance with our Sustainability Policy, we:

- Continuously evaluate and refine our sustainability strategy in response to evolving global frameworks and stakeholder expectations.
- Monitor performance through key sustainability indicators and share our progress transparently with stakeholders in our sustainability reports.





# SUSTAINABLE VALUE CHAIN

Konya

As a renewable energy company operating in climate technologies and solar EPC sector, we are committed to embedding sustainability into every stage of our value chain. Our approach is designed to ensure responsible operations, reduce environmental impact, and create long-term value across the project lifecycle—from innovation to end-of-life.

**Project Development:** Our project development phase emphasizes: Site selection based on technical feasibility, environmental and social impact assessments (EIA/SIA), and stakeholder consultations. Compliance with permitting processes, land-use regulations, and biodiversity protection guidelines. Design optimization for environmental sustainability and long-term viability.

**Engineering and Design:** We develop tailored solar PV system designs, with our teams covering civil, structural, mechanical, and electrical engineering experience. In-house teams and external consultants are engaged to ensure adherence to technical standards and sustainability benchmarks.

**Sustainable Procurement:** We apply ESG criteria in supplier contracting and relations as per our Supplier Policy. Our strategy includes Prioritizing suppliers with certified environmental and labour practices. Encouraging traceability and ethical sourcing of materials and components. Promoting local procurement where feasible to enhance community benefit. We run regular surveys to obtain supplier data and feedback.

**Construction and Installation:** We aim to minimize environmental disruption during construction by: Implementing erosion and sediment control plans. Reducing waste and emissions through resource-efficient processes. Ensuring occupational health and safety for workers through OHSAS-compliant practices. We provide battery storage solutions and integrations services to further increase the use of renewable energy.

**Operating and Maintenance Services:** Our subsidiary, Angora Elektrik, provides O&M services for long-term performance optimization: Routine and predictive maintenance to extend asset lifespan. Real-time monitoring to ensure output and operational stability. Rapid fault detection and troubleshooting to minimize downtime.

**Decommissioning:** For the end-of-life decommissioning stage of our value chain, we are enhancing our focus on circular economy principles by: Exploring recycling and recovery technologies for solar panels and components. We are targeting to partner with suppliers and recyclers committed to responsible disposal practices. Evaluating reuse options to reduce lifecycle waste.

**Sustainable Financing:** We aim to finance renewable energy investments through: Project financing, capital market tools including IPOs and green financing tools. Comprehensive financial planning to ensure long-term project viability. Integration of ESG criteria into investment decision-making processes.

**Research and Development:** Our goal is to invest in and collaborate for research and innovation to improve energy efficiency and develop advanced climate technologies. Our strategy includes partnering with local and global stakeholders to identify investment opportunities in new geographies; Supporting early-stage innovation through start-up incubation programs and partnerships; Developing AI supported solutions that improve solar system efficiency, integration, and monitoring.





# MATERIALITY ANALYSIS



## Overview

In 2024, we updated our materiality assessment to reflect changing sustainability priorities in the energy sector and to align with evolving stakeholder expectations and sustainability standards. The objective was to enhance our sustainability performance and ensure alignment with the principles of the Global Reporting Initiative (GRI), ESG principles and relevant international frameworks.

### Materiality Assessment Process

Our process consisted of the following three stages:

#### 1. Identification of Potential Material Topics

We began by creating a longlist of sustainability topics, taking into consideration:

- Our corporate strategy and operational priorities
- National and International frameworks and standards: **GRI, UN SDGs, TCFD, ISSB, ESG, CMB Turkiye, NGC, UN WEPs.**
- Emerging global risks and trends, particularly insights from the **COP 29, World Economic Forum (WEF) Global Risks Report**
- At this stage, we identified **23 relevant sustainability topics** across environmental, social, and governance topics.

#### 2. Stakeholder Input and Engagement

We designed and circulated a detailed stakeholder survey to gather feedback on these topics. The survey included sustainability-based questions tailored to our business and value chain. Stakeholders were invited to assess the significance and impact of each issue based on their expectations and perceptions of our organization's impact. As reported in the Stakeholder Engagement and Communication section, we included a broad set of internal and external stakeholders in our survey.

#### 3. Prioritization and Validation of Material Topics

Following the stakeholder evaluation phase, the

**Executive Committee** reviewed the findings and approved the final list of material topics. In 2024, a total of **12 topics were prioritized** as material, based on the consideration of the significance of the Company's impact on the economy, environment, and people.

Based on this year's analysis, **two new material topics were added:**

- Supply Chain Sustainability
- Stakeholder Communication and Collaboration

These topics form the basis for the disclosures in this Sustainability Report and guide our strategy, risk management, and performance reporting.

### Future Materiality Planning and Alignment with Financial Reporting Standards

In alignment with national and international best practices and in anticipation of evolving regulatory requirements, we will start reporting in line with the Turkish Sustainability Reporting Standards (TSRS).

Our Reporting Subcommittee has initiated preparatory work to ensure alignment with TSRS requirements, which incorporate financial risk and opportunity disclosures for sustainability and climate.

# KEY INSIGHTS FROM MATERIALITY ANALYSIS

Our most recent materiality analysis identified the following high-priority sustainability topics for Naturel Enerji. These topics reflect the Company's significant impacts on the economy, environment, and society, and align with both stakeholder expectations and the GRI Standards framework.

## Environment

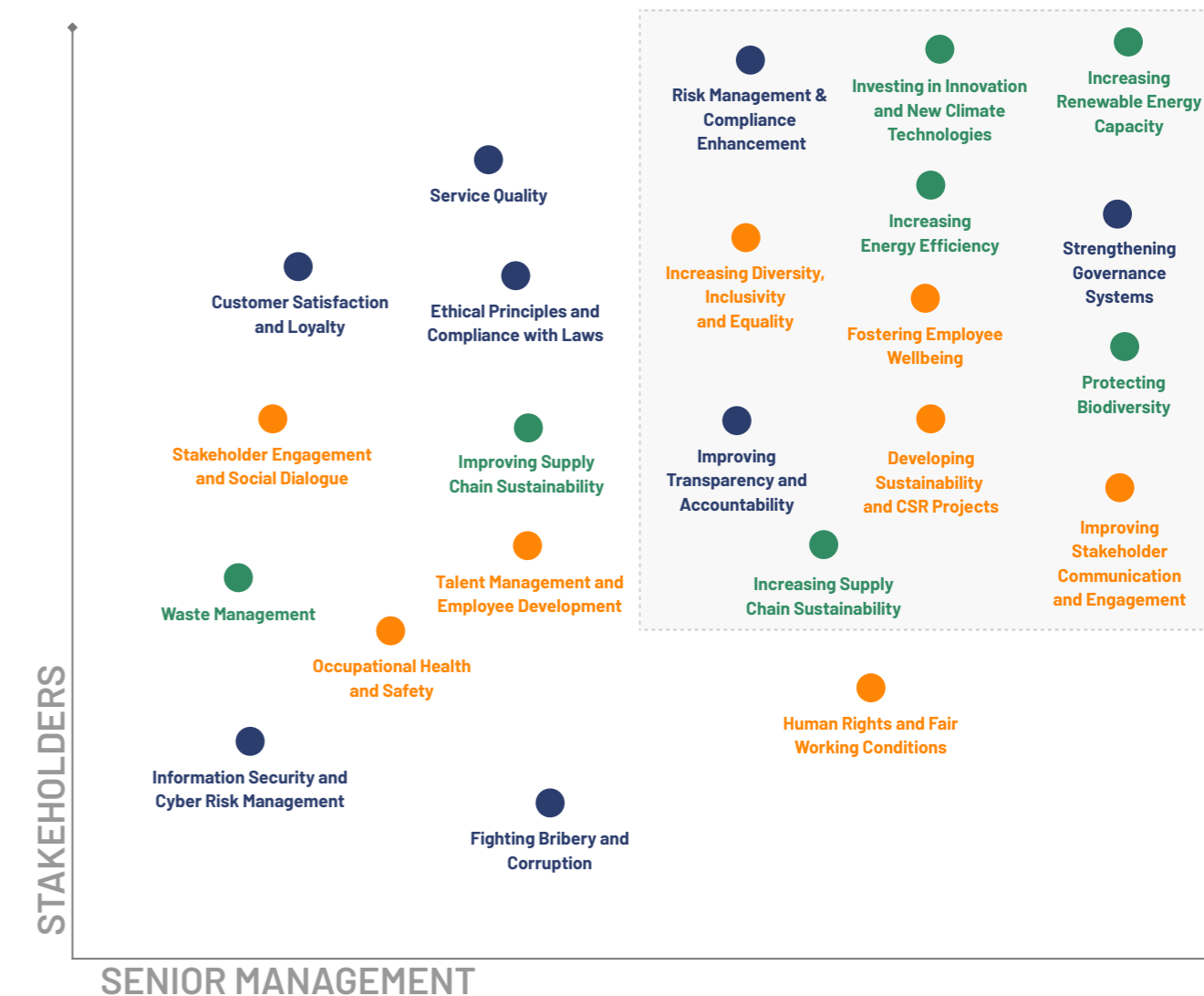
- **Increasing Renewable Energy Capacity:** Investing in new renewable energy plants and delivering EPC services to expand installed capacity from clean sources.
- **Increasing Energy Efficiency:** Improving the efficiency of existing energy production assets and maximizing the share of renewables in energy consumption.
- **Investing in Innovation and New Climate Technologies:** Collaborating on the development of innovative climate technologies and R&D, investing in climate technologies ventures, supporting with incubation services.
- **Protecting Biodiversity:** Implementing biodiversity conservation and afforestation measures within and around renewable energy projects.
- **Increasing Supply Chain Sustainability:** Conducting supplier meetings, sharing sustainability criteria, and developing joint initiatives to embed circular economy principles across the value chain.

## Social

- **Developing Sustainability and CSR Projects:** Promoting sustainability awareness and strengthening STEM education as part of sustainability and corporate social responsibility efforts.
- **Increasing Diversity, Inclusivity, and Equality:** Promoting equal access to education, fostering inclusive practices, and empowering women through leadership and entrepreneurship support.
- **Fostering Employee Well-being:** Encouraging work-life balance, boosting employee satisfaction, and supporting leadership development through sustainability-focused programs.
- **Improving Stakeholder Communication and Engagement:** Organizing webinars, sharing sustainability content, and improving stakeholder dialogue to raise awareness and co-create impact.

## Governance

- **Strengthening Governance Systems:** Aligning internal governance with global sustainability standards and embedding ESG considerations into committee structures and policies.
- **Risk Management and Compliance Enhancement:** Advancing internal audit systems, enhancing data security practices, and improving risk reporting mechanisms.
- **Improving Transparency and Accountability:** Digitizing ESG reporting and integrating sustainability targets within corporate ERP and performance systems.





# RESILIENCE FOR PLANET

Environmental Sustainability Approach

Increasing Renewable Energy Capacity

Increasing Energy Efficiency

Investing in Innovation and New Climate Technologies

Protecting Biodiversity

Increasing Supply Chain Sustainability

Emissions Management

Water Management

Waste Management



# ENVIRONMENTAL SUSTAINABILITY APPROACH

We are committed to safeguarding the environment for future generations by proactively identifying, managing, and mitigating our environmental impacts in line with our [Environment Policy](#) and material sustainability targets.

Our environmental strategy is structured around five material priorities:

- Increasing the share of **renewable energy** in our portfolio
- Enhancing **energy efficiency** in operations
- Investing in **innovation and climate technologies**
- **Protecting biodiversity** for ecosystem resilience
- Increasing **sustainability of our supply chain** to reduce carbon footprint

To support these priorities, we are implementing initiatives to **monitor, measure, and continuously improve** our environmental performance. In collaboration with our internal and external stakeholders, we monitor evolving national and international regulatory and policy developments, aim to align our practices with best standards and frameworks and integrate them into our processes.

In 2024, we further enhanced the **accuracy and completeness of our GHG emissions data** (Scopes 1, 2 and 3) and adopted updated methodologies for emissions calculation in accordance with **ISO 14064** which are explained in our Carbon Footprint Report. We have set 2024 as our base year and a long-term **net-zero target by 2050** to continue to evaluate decarbonization pathways for our existing and developing asset portfolio, particularly through energy efficiency improvements.

## Environmental Oversight and Governance

The Company's environmental performance is overseen by the **Environment Subcommittee**, which reports directly to the CEO and the Executive Committee. The Subcommittee ensures the effective implementation of environmental policies and targets across business functions. In 2024, the Subcommittee included two full-time roles:

- Sustainability Expert
- Environmental Expert

This structure is set up to support cross-functional coordination and to ensure environmental responsibilities are embraced throughout our value chain.

In 2026 we will continue disclosing our progress on environmental targets in accordance with the **GRI** and start TSRS reporting which will discuss financial materiality.



# INCREASING RENEWABLE ENERGY CAPACITY

As a company specializing in climate technologies, we seek and develop business opportunities where net-zero emission is targeted, accordingly with our main services, we are committed to supporting the global sustainability and global energy transition by increasing renewable energy capacity.

Our engineering, procurement, and construction (EPC) services facilitate the deployment of clean energy systems for both our customers and our own portfolio.

## Strategic Expansion and Investment

In line with our long-term sustainable growth strategy, we continued to expand our renewable energy footprint in 2024:

- **International Expansion:** Through our subsidiary **Margün Enerji**, we established new legal entities in **the Netherlands, Romania, Italy, the United Kingdom, Spain, and Greece** to initiate and scale our renewable energy investments and EPC operations across Europe. These companies will enable us to develop, install and operate clean energy assets aligned with international energy targets and EU sustainability goals.

- **Renewable Project Development:** We aim to deliver integrated EPC solutions for solar, wind, and geothermal projects, focusing on increasing installed renewable energy capacity and energy access in all markets we operate.

## Post-Reporting Period Development

Post-reporting period, in March 2025, we further expanded our renewable energy investments to include **RSC Elektrik**.

Through Margün Enerji, we acquired a 100% stake in **RSC Elektrik**, the owner and operator of a geothermal power Plant located in Seferihisar, İzmir, Türkiye.

This investment strengthens our presence in the geothermal segment, in addition to our investment in Enda Enerji, and contributes to the diversification of our renewable energy portfolio.



Ankara / Akyurt



# INCREASING ENERGY EFFICIENCY

We are committed to improving energy performance across all operations in line with its **Energy Efficiency Policy** and the **ISO 50001**. Our efforts focus on reducing total energy consumption, optimizing operational energy use, and supporting equitable access to clean energy technologies.

## Performance Target

We have set a strategic goal to **improve operational energy efficiency by 30% by 2030**. This target will be achieved through:

- Increasing the share of **renewable energy consumption** in our operations.
- Deploying **integrated battery storage systems**, and
- Adopting **AI-powered energy management systems** that optimize energy demand and grid interaction.

## Contribution to Global Goals

Our strategy to scale renewable energy capacity directly supports global net-zero pathways and **COP28 objectives**. Each unit of renewable capacity we build—whether for our own portfolio or for our clients through EPC services—contributes to improving **global energy efficiency and lowering carbon emission intensity**.

## Innovation and Collaboration

Beyond capacity building, we collaborate with stakeholders across our value chain to:

- **Develop and invest in innovative climate technologies** that improve energy efficiency at the system level (e.g., IoT-enabled monitoring, and predictive analytics),
- Foster adoption of new energy solutions across diverse sectors and communities.

## Access and Affordability

As per our Energy Efficiency Policy, in alignment with our social inclusion principles and commitment to **equal access to renewable energy**, we have introduced a **reduced-rate policy for small-scale customers** who wish to generate solar energy for their own use. This initiative contributes to energy democratization and supports SDG 7 (Affordable and Clean Energy).

This energy efficiency strategy reflects Naturel Enerji's integrated approach to **sustainability, innovation, and just transition**, ensuring that environmental performance improvements are inclusive and forward-looking.





# INVESTING IN INNOVATION AND NEW CLIMATE TECHNOLOGIES

## Digital Innovation Energy Efficiency

In 2024, we continued to offer our customers our proprietary **Energy Management Monitoring System** under ENSOFT brand. This system is designed to enhance the sustainability of renewable energy power plants by increasing operational efficiency. It supports preventive maintenance planning based on real-time and historical data, reduces downtime and intervention durations, and minimizes generation losses. As a result, it improves time, labour, and cost efficiency in operations and maintenance. The system also enables transparent and reliable reporting, supporting both internal decision-making and external sustainability disclosures.

Using this system in our own operations directly contributes to our target of improving operational energy efficiency by 30% by 2030 and aligns with global efforts to enhance the performance and resilience of renewable energy systems. It also reflects our commitment to climate-related innovation under SDG 7 (Affordable and Clean Energy) and SDG 13 (Climate Action), and supports clients in reducing their own carbon footprints.

## Investment in Battery Storage Technology

We actively monitor advancements in **climate technologies**,

with a focus on **battery energy storage systems (BESS)** as a key enabler of decarbonization. Battery storage plays a critical role in storing intermittent renewable energy, stabilizing supply, and enhancing **energy efficiency and grid flexibility**.



Muğla / Özmen -1

## 2024 Project Completion

In 2023, our subsidiary Margun Enerji signed an agreement to install a **2.064 MWh battery storage** unit at our **20.064 MWp Özmen-1 Solar Power Plant**, located in the Milas district of Muğla. In 2024 this project was completed to mark the first **battery energy storage system approved by EMRA (Energy Market Regulatory Authority)** in Türkiye. The system was integrated with the solar plant to enable optimized **dispatch and load management**.

## EPC Services Offering

In 2024, in response to climate-related market opportunities, we launched **battery-integrated EPC solutions** to support our clients in enhancing system efficiency, flexibility, and alignment with low-carbon transition goals. These services support both energy producers and consumers in improving their energy performance and ensuring long-term sustainability and compliance with evolving regulatory frameworks.

## Market Outlook and Integration Strategy

Energy storage systems not only help our customers reduce their carbon footprint but also create additional revenue opportunities by providing frequency support services to the grid. These developments support financial resilience during the transition to a low-carbon economy.

With the **declining cost trends in battery storage technologies**, we anticipate an acceleration in the adoption of integrated BESS solutions across renewable energy projects. As part of our innovation roadmap, we aim to scale such solutions to increase overall system efficiency and resilience.



# PROTECTING BIODIVERSITY

Our Environment Subcommittee ensures to implement our **Environment Policy**, to protect and improve biodiversity of the natural environment, vegetation, animals and nature in the geographies we operate.



## Environment Impact Assessment (EIA) Reports

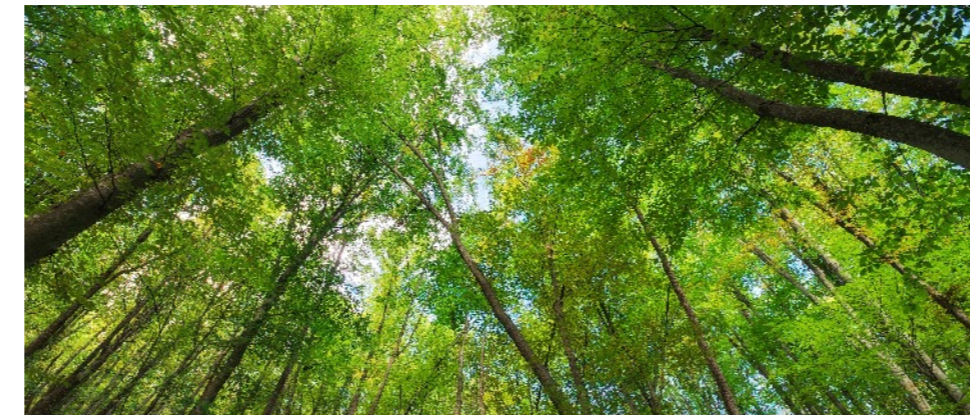
As part of our project development and upstream EPC services, we conduct **Environmental Impact Assessment (EIA)** studies to identify, evaluate, and manage potential environmental risks. These assessments are aligned with both **national regulations** and international standards, including the GRI Standards, and are conducted during the early stages of our project lifecycle to ensure timely and effective mitigation measures.

### Through these assessments, we aim to:

- Prevent or minimize negative impacts on **local biodiversity**, ecosystems, and protected species
- Identify and manage environmental risks associated with land use, water resources, and emissions

- Ensure compliance with permitting and land-use regulations
- Promote the **avoidance–minimization–restoration** hierarchy in biodiversity protection
- Inform project design and decision-making processes with environmentally responsible criteria

Our EIA practices contribute to sustainable land use, reinforce the **precautionary principle**, and serve as a foundational input for our broader environmental and sustainability risk management systems.



## Ecosystem Restoration and Community Engagement

As part of our environmental restoration commitments, we have been supporting Naturel Holding afforestation project since 2022 in collaboration with the **General Directorate of Forestry in Eğirdir, Isparta**.

This long-term initiative involves afforestation project with a diverse range of trees, including **fruit-bearing species**, with the aim of restoring forest ecosystems, enhancing local biodiversity, and promoting climate resilience.

This afforestation effort contributes to the protection and restoration of natural habitats, supporting native flora and fauna while fostering biodiversity. Additionally, the project also delivers **socioeconomic value** by enabling local communities to generate supplementary income from the sale of harvested fruit.

This initiative represents a key component of our commitment to nature-based solutions, community-inclusive development, and ecosystem-based climate mitigation strategies.



## Agrisolar Projects

In line with our commitment to preserving biodiversity and supporting sustainable land use, we actively pursue the development of agrisolar projects where feasible.

These initiatives aim to promote the coexistence of renewable energy generation with agricultural activities and animal life, thereby enhancing ecosystem resilience and contributing to the protection of local biodiversity.

Additionally, such projects generate indirect economic benefits for rural communities through continued agricultural productivity.



# INCREASING SUPPLY CHAIN SUSTAINABILITY

We are committed to strengthening the environmental, social, and governance (ESG) performance of our supply chain in alignment with the sustainability principles defined in our corporate policies and international best practices. Our approach aims to ensure that all suppliers operate in accordance with internationally accepted sustainability values and contribute to our shared ESG goals in line with our [Supplier Policy](#).

## Environmental Performance of Suppliers

We evaluate environmental performance criteria when selecting and monitoring suppliers. These criteria include:

- Use of renewable energy and targets to increase it,
- Minimizing water consumption and adopting water reuse strategies,
- Reducing and capturing greenhouse gas emissions,
- Efficient transportation and logistics planning,
- Waste minimization, and circular economy practices.

We prioritize suppliers with ISO 14001 (Environmental Management), ISO 14064 (GHG Accounting), and ISO 50001 (Energy Management) certifications. We also request environmental product declarations, life cycle assessments, and carbon footprint reporting, where applicable.

Suppliers are required to share detailed information about their packaging practices, including material types, environmental impacts, and improvement plans. We actively encourage the adoption of biodegradable or reusable packaging, and we collect this data through regular supplier evaluation surveys to track progress and raise awareness.

## Social and Human Rights Standards

As a signatory to the United Nations Global Compact (UNGC), we uphold the Ten Principles relating to human rights, labour, environment, and anti-corruption. We expect our suppliers to adopt the same principles and ensure:

- Compliance with labour laws and decent working conditions,
- Non-discrimination and equal opportunity employment,
- Occupational health and safety protection,
- Prohibition of child and forced labour and protection of human and children's rights.

Our [Supplier Policy](#) is annexed to all supplier agreements and is the basis for annual social sustainability surveys and evaluations. Suppliers that fail to align with our ethical and human rights expectations are subject to contract termination as per our Supplier Policy.

## Governance and Due Diligence Processes

We are enhancing our due diligence procedures by improving our supplier onboarding process and targeting to develop a digital evaluation and monitoring platform. Starting in 2027, we are aiming to develop a web-based supplier onboarding module and reinforce our annual supplier evaluation surveys with ESG metrics.

To increase supplier capacity and alignment with our sustainability goals, we plan to deliver training on ESG performance and reporting requirements. We regularly monitor compliance through surveys and performance reviews, and we engage in corrective actions where needed.

## Local Sourcing and Innovation Collaboration

To ensure supply chain resilience, we target a diversified pool of suppliers across all critical procurement categories. We prioritize local sourcing to support regional economies and reduce transportation-related emissions. Where international suppliers are used, we seek compliance with our sustainability and performance requirements. We actively collaborate with local and global technology providers to co-develop and locally manufacture innovative climate technologies to integrate into our EPC projects and investments.



# EMISSIONS MANAGEMENT



	2024	Target
Scope 1 (ton CO2eq)	86.21	Reduce 30% by 2030
Scope 2 (ton CO2eq)	80.10	Reduce 30% by 2030
Scope 3 (ton CO2eq)	2,547.77	Reduce 25% by 2030
<b>Total (ton CO2eq)</b>	<b>2,714.08</b>	

## Overview

We expanded our carbon footprint calculation data set, identified 2024 as our base year for emission calculations.

We do not have any chemicals or toxic materials such as VOC, SOx, PBT, PVC, etc, emitted by our operations. The Company emits 1.403 tons of NOx emissions due to mobile combustion and flights.

We recognize the critical importance of emissions management in addressing climate change and supporting the transition to a low-carbon economy. In line with our Environment Policy and material sustainability targets, we are committed to reducing greenhouse gas (GHG) emissions across our value chain.

The Environment Subcommittee, reporting to the CEO and Executive Committee, is responsible for implementing and monitoring emissions-related initiatives. Our emissions management strategy includes operational emission reduction measures, employee engagement, supplier requirements, and target setting in accordance with international frameworks.

## Scope 1, 2, and 3 Carbon Emissions Reduction

We have set a target of achieving **net-zero emissions by 2050**. As interim targets by 2030, we aim to, compared to the 2024 base year:

- Reduce **Scope 1 and Scope 2 emissions by 30%**,
- Reduce **Scope 3 emissions by 25%**.

To achieve these goals, we are implementing decarbonization actions, including:

- **Electrification of Our Fleet:** In 2024, we increased the number of electric vehicles in our corporate fleet to reduce emissions from staff transportation. These efforts are complemented by our awareness-raising Sustainability Webinars, which promote environmentally responsible, commute and transportation options among employees.
- **Green Office Practices:** As part of our **Green Office Policy**, we prioritize operating in energy-efficient, sustainability-certified buildings. Our Istanbul Office, located in Zorlu Center—a recipient of the Green Good Design Award—is a demonstration of this policy in action.

- **Supply Chain Meetings:** We are visiting our suppliers regularly and discussing our sustainability targets with them with an objective to increase the supply chain awareness on carbon emissions and circular business practices.

We expect our suppliers to align with national and international carbon emissions reduction goals and to avoid the release of any toxic or hazardous substances into the environment. Under our Supplier Policy, we request evidence of emissions management practices and reserve the right to terminate contracts with suppliers that fail to comply.



# WATER MANAGEMENT

	2022	2023	2024
Total water consumption (lt)	606,000	692,000	623,100
Total freshwater consumption (lt)	0	0	0
Amount of water recycled or reused (lt)	0	0	0

As part of our commitment to environmental sustainability, we implement proactive water management practices across our office operations and core EPC (Engineering, Procurement, Construction) and O&M (Operations & Maintenance) services. These practices are embedded within our [Environment Policy](#) framework to minimize our overall water footprint.

### Water Use in Office Operations – Green Office Practices

Under our Green Office Policy, we have adopted smart technologies to reduce water use in office spaces:

- Sensor-activated taps are installed in sink areas to prevent unnecessary water consumption.

- A kitchen water purification system reduces reliance on bottled water and contributes to the conservation of natural water resources while reducing plastic waste.

### Water Use in Cleaning of Generation Assets

Our subsidiary, Margün Enerji, operates 118 MW of land-type solar power plants. Located away from industrial zones, these facilities do not typically require active panel washing. Instead, natural rainfall is optimized for panel cleaning, resulting in **net-zero water use for maintenance activities**.

### Water Management in Land & Project Development, EPC & O&M Services

As part of our land-type EPC services, we conduct environmental assessments for the

project site, including evaluations of water sources, discharge methods, surface water overflow risks, and groundwater conditions to identify potential water withdrawal, recharge, and contamination risks.

In our EPC and O&M services, we take active steps to reduce clients’ operational water footprint by implementing water-efficient panel cleaning strategies:

- For ground-mounted solar panels, we recommend cleaning only **twice per year**—in May and August—when rainfall is lowest, and energy production peaks.
- For rooftop installations, cleaning frequency is adapted based on dust accumulation and exposure to industrial particles.
- We use automated robotic systems designed to clean effectively with minimal water consumption.

### Water-Related Expectations in Our Supply Chain

When engaging third-party contractors (e.g., construction or cleaning), we share our:

- [Supplier Policy](#), and,
- [Environmental Policy](#)

along with our contractual agreements to clearly set expectations for water use, discharge, treatment, and reuse in line with our sustainability principles.

Additionally, we organize webinars to increase awareness, knowledge and responsibility regarding water conservation and management in relation to the services provided by our suppliers.

We do not have any freshwater consumption. We also do not recycle or reuse any water in our operations.





# WASTE MANAGEMENT

	2022	2023	2024
Total amount of waste generated (tons)	0.03	0.14	0.38
Total amount of non-hazardous waste generated (tons)	0.03	0.14	0.38
Total amount of hazardous waste generated (tons)	0	0	0
Total amount of recycled and reused waste generated (tons)	0.03	0.14	0.38

We manage our waste in alignment with the ISO 14001 Environmental Management System and our internal [Environment Policy](#), aiming to prevent, reduce, and responsibly manage waste across office and operational sites.

### Governance and Oversight

Our **Waste Management Subcommittee** is responsible for overseeing waste-related impacts and ensuring the effective implementation of our waste management procedures. The Subcommittee monitors compliance with applicable regulations and continuously improves performance by collaborating with internal and external stakeholders, especially local authorities.

### Performance Highlights – 2024

- **Zero hazardous waste** was generated in 2024 across our operations.
- **100% of non-hazardous waste** was either **recycled** or **repurposed** in accordance with national regulations and our internal waste policies.

### Office Waste Management

Under our **Green Office Policy**, we implement initiatives aimed at reducing waste generation and promoting recycling:

- **Plastic Reduction:** We eliminated single-use plastic bottles in all offices by installing water sanitisation systems and transitioning to reusable glass bottles.
- **Waste Separation at Source:** Recyclable waste is sorted into glass, plastic, paper, and metal using color-coded bins in all office common areas. The recyclable materials are collected and processed by local municipal services.

- **Paper Use Minimization:** Employees are encouraged to use digital tools to avoid printing. When printing is necessary, both sides of paper are used, and single-sided waste is reused as draft paper before recycling.
- **E-Waste Management:** We collect and deliver e-waste such as laptops, screens, printers, and fax machines to certified recyclers in partnership with municipal authorities, in line with our e-waste handling policy.

### Field Operations Waste Management

In our EPC installation sites:

- **On-site Waste Collection:** We coordinate with local municipalities and other licensed waste management companies for the proper disposal and recycling of operational waste.

- **Data and Monitoring:** We are in the process of developing a system for tracking, measuring, and reporting the amount and type of waste generated and recycled in our field operations.

For decommissioning stage of generation assets, we are planning to work with suppliers practicing collection, recycling and re-purposing as per circular economy principles.

Our approach reflects our commitment to reducing environmental impact, the Circular Economy principles, and our overarching goal of advancing sustainable operations.



# RESILIENCE FOR PEOPLE

Social Sustainability Approach

Sustainable Schools Projects

Corporate Social Responsibility Projects

Stakeholder Engagement and Communication

Fostering Collaborations

Human Resources Approach

Customer Satisfaction

Occupational Health and Safety



# SOCIAL SUSTAINABILITY APPROACH

We are committed to creating positive social value through integrating sustainability goals and ESG principles into our strategy, decision making and actions. In line with our [Sustainability Policy](#) and [Human Resources Policy](#), we renewed our social commitments in 2024 as continued signatories of UNGC and UN WEPs.

We have identified four material social goals that align with our corporate objectives:

1. Creating social value through sustainability and CSR projects,
2. Increasing equality, diversity and inclusion,
3. Promoting well-being of our stakeholders, and,
4. Improving communication and collaboration with our stakeholders

These priorities are based on our belief that sustainability and innovation will be fostered in social equality, first and foremost in equal access to quality education—particularly in STEM fields—and driven by the strength of equality, diversity, inclusion and well-being of society, as well as



collaborating with our stakeholders for the same goals.

To ensure effective oversight and implementation of our social strategy, we have established a Stakeholder Engagement Subcommittee, which reports directly to the CEO and the Executive Committee. This Subcommittee is composed of three full-time professionals: a Corporate Communication Expert, a Human Resources Expert, and a Business Development Expert.

Our social management framework focuses on key areas:

- **Sustainability in Education:** We aim to contribute to Naturel Holding Sustainable Schools project, which focuses on transition to renewable energy in schools, supporting STEM education, and increasing sustainability awareness
- **Equality, Diversity and Inclusion:** As signatories of UN WEPs, we are working to achieve 50% female representation in all management levels by 2030.
- **Stakeholder Well-being:** We target a minimum of 80% participation rate of our internal stakeholders to our well-being projects

- **Collaborations with stakeholders:** We are targeting to increase our project collaborations with our internal and external stakeholders following our Stakeholder Engagement and Communication programme

### Looking ahead:

From 2025 and onwards, we plan to,

- improve our measurement mechanisms in social sustainability, by tracking our performance using defined KPIs, which are monitored monthly within our ERP system,
- fully incorporate sustainability performance into internal audit and external audit process for independent assurance also required for TSRS reporting,
- provide additional training for all managers to cover equality, diversity and inclusion practices in corporate environment, and,
- integrate digital data management systems into our IT systems for better data management and better communication with our suppliers in order to increase supply chain sustainability.



# SUSTAINABLE SCHOOLS PROJECT

## Commitment and Purpose

In 2024 we continued supporting Naturel Holding Sustainable Schools Project by developing the project with our stakeholder Twin Science and T.C. MEB. The project focuses on transition to renewable energy, supporting STEM education, and increasing sustainability awareness in schools, thereby supporting community resilience and innovation vision in Türkiye. In 2024 the first STEM lab was founded in a public elementary school in Ankara called Şehit Mehmet Çetin İlkokulu.

## Scope and Responsibilities

- **Project owner:** Sustainability Committee, Stakeholder Engagement Subcommittee
- **Delivery partners:** Our subsidiary Esenboğa Elektrik (roof-top solar power plant installation), Twin Science (curriculum & lab management), selected public or private schools and their teachers.
- **Geographical boundary:** Schools in provinces where we operate or source labour

## Key Components and Actions

- Roof-top Solar Power Plants – design, procurement, and installation of PV systems on school roofs that have suitable structural and grid conditions.
- Sustainability-Themed STEM Labs – creation of hands-on learning spaces equipped with Twin Science robotic coding kits and an online learning platform

- Teacher and Student Capacity-Building – delivery of blended workshops that embed renewable-energy and sustainability concepts into national STEM curricula

## Implementation Timeline

- **Phase 1 – 2024:** Shortlist and audit candidate schools, secure permits, finalise engineering designs, and train pilot teachers.
- **Phase 2 – 2025:** Install PV systems, commission labs and commence STEM education programme.

## Intended Outcomes and KPIs (Per School)

- **Environmental impact:** Annual generation target of  $\geq 9$  KWh of clean electricity and annual carbon reduction of 138 tons CO<sub>2</sub> and entire lifetime (30 yrs) of system carbon reduction of 4,137 tons CO<sub>2</sub>
- **Educational impact:** Install one STEM lab in one school each year,
- **Social impact:** Achieve  $\geq 80$  % satisfaction in post-programme surveys and replicate the model in other provinces.

## Monitoring and Evaluation

Energy output will be tracked via remote monitoring software. Educational metrics (training hours, student reach) will be obtained from our partnering schoolteachers and stakeholder feedback collected through continued stakeholder communication.



## Contribution to Strategy

By supporting STEM skills development, the Naturel Sustainable Schools Project exemplifies our commitment to the UN SDGs (4, 7, 13, 17) and supports our long-term target of expanding Türkiye’s renewable-energy capacity while cultivating the next generation of innovators.

This project not only addresses present clean energy needs but also invests in future resilience by equipping young people with the knowledge, skills, and inspiration to drive sustainable innovation.





# CORPORATE SOCIAL RESPONSIBILITY PROJECTS



## Equal Access to Higher Education Project

In line with our social sustainability approach and corporate values of equality, inclusion, we support the Anatolian Scholars Program developed by Koç University. This program provides financial scholarships to academically successful students from economically disadvantaged regions in Turkey, removing financial barriers to higher education and promoting academic excellence.

This initiative not only empowers individual development but also contributes to the advancement of equal access to education and the promotion of diversity and inclusion. Through this collaboration, we support the creation of a more inclusive and equitable society by expanding educational opportunities to underrepresented communities.

The program reflects our broader sustainability strategy and supports our commitment to the United Nations Sustainable Development Goals with solid actions specifically in:

- **SDG 4: Quality Education** – by supporting inclusive and equitable access to higher education
- **SDG 10: Reduced Inequalities** – by providing opportunities for economically disadvantaged individuals

As part of our stakeholder engagement and community impact efforts, we regularly evaluate the social outcomes of our community investment initiatives and integrate them into our broader ESG performance monitoring.





# STAKEHOLDER ENGAGEMENT AND COMMUNICATION

We are committed to fostering open, inclusive, and transparent dialogue with our stakeholders across the value chain. In alignment with our corporate value of transparency and our ESG commitments, we continuously engage stakeholders to understand their expectations, gather feedback, and integrate these insights into our strategic and operational decision-making processes.

We classify our stakeholders into three primary categories:

- **Direct Economic Stakeholders:** Customers, employees, suppliers, investors, and shareholders
- **Indirect Economic Stakeholders:** Local communities, NGOs, academia, and media
- **Regulatory and Oversight Stakeholders:** Public authorities, policymakers, and standard-setting organizations

We employ a range of stakeholder engagement mechanisms, including:

- Regular surveys and feedback forms
- Public disclosures via our Sustainability Report (published annually in accordance with GRI Standards)
- Periodic ESG updates and progress reporting
- Bilateral meetings and public consultations
- Dedicated communication channels and stakeholder grievance mechanisms

These communication tools are tailored based on the stakeholder group and the nature of their interaction with our company. The frequency of engagement varies: some stakeholders are

engaged continuously (e.g., customers and employees), while others are engaged periodically (e.g., regulators and investors).

Our approach ensures that the voices of all relevant stakeholder groups are reflected in our materiality assessments, risk management processes, and sustainability strategy.

Communication Method	Communication Frequency	Employees	Customers	Suppliers	Investor	Academic	Public Orgs	NGOs	Local Communities	Regulatory Bodies	Regulatory Orgs
		Direct Economic Impact				Indirect Economic Impact				Regulatory Bodies	
Corporate Website	Throughout the Year	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Social Media	Throughout the Year		✓	✓	✓	✓	✓	✓	✓	✓	✓
Sustainability Report/ESG Reporting	Annually	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Interim and Annual Activity Reports	Quarterly/Annually	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Surveys	Throughout the Year	✓	✓	✓	✓	✓	✓	✓		✓	✓
Public Notifications	Throughout the Year	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Trainings	Throughout the Year	✓		✓					✓		
Corporate Social Responsibility Activities	Throughout the Year	✓				✓	✓	✓	✓		
Meetings	Throughout the Year	✓			✓				✓		
Internal Events	Throughout the Year	✓									
Corporate Internal Communication	Throughout the Year	✓									
Fairs	Throughout the Year		✓	✓	✓						
Visits/Audits	Throughout the Year			✓							
Investor Presentations	Throughout the Year				✓						
Audits	Throughout the Year			✓						✓	
Collaborations/Joint Projects	Throughout the Year		✓	✓		✓	✓	✓			
Participation in Working Groups	Throughout the Year							✓			
Memberships	Throughout the Year							✓			
Donations and Sponsorships	Throughout the Year					✓	✓	✓	✓		





# FOSTERING COLLABORATIONS



## Trade Fairs

In 2024, we actively participated in national and international trade fairs to enhance business development and collaboration opportunities in climate technologies contributing to global sustainability.

## Supplier Meetings

Through regular dialogue and meetings with existing and potential suppliers, we aimed to improve transparency, align expectations, promote responsible procurement across our operations and to improve sustainability of our value chain with circular economy practices.

## Webinars

We organised monthly webinars for our internal stakeholders to share insights on sustainability practices and explore innovative solutions aligned with our ESG goals.



# HUMAN RESOURCES APPROACH

## Workplace Culture:

In alignment with our [Human Resources Policy](#), we aim to foster a workplace culture based on corporate values of sustainability, innovation, equality and inclusion, transparency and accountability.

In 2024, we renewed and strengthened our commitment to UN Global Compact (UNGC) and Women’s Empowerment Principles (UN WEPs).

We continued employee webinars and discussions throughout the year to embed our corporate values across business practices and enhance interdepartmental collaboration through sustainability-focused subcommittees.

## Talent Acquisition and Retention:

We address the growing demand for technical expertise in the renewable energy sector through strategic recruitment, internship opportunities, performance management and [succession policy](#).

*Internships:* In 2024, we hosted 1 university intern provided on site working experience in EPC services of land-type and roof-top solar power stations.

*Performance Management System:* We work with a performance evaluation system which includes appraisals, feedback and performance metrics. In 2024, our Human Resources division continued to improve performance evaluation system with the ongoing digitalisation process, laying the foundations of a new and improved ERP system and linked with sustainability KPIs and employee training and development requirements.

*Succession Policy:* We have a policy to prioritize internal career mobility and in 2024, 7 employees were promoted to senior roles, supporting our succession planning objectives.

## Employee Well-Being:

In 2024, we continued to support, Naturel Holding Walking Club, an initiative launched to encourage a healthy lifestyle and charitable action, and, Naturel Holding Volunteers Club, empowering employees to lead social initiatives in collaboration with internal and external stakeholders such as charity and social organisations.

*Work-Life Balance:* As part of our flexible working policy, we offer remote work option every two weeks. We promote early workday ending hour during Ramadan, to support personal lifestyle choices and well-being. Employees enrolled in further education programs benefit from flexible scheduling aligned with their academic commitments.



# HUMAN RESOURCES APPROACH

	2022	2023	2024
Direct Employment	122	153	195
Woman	26	31	42
Man	96	122	153

## Employee Training and Development

New employees embark on an in-house technical training programme upon starting their work and the duration of their trainings are determined by each department manager. We maintain a diverse training calendar developed in collaboration with department leads and third-party providers, meeting the specific training and development needs of our employees.

In 2024, key topics included:

- Sustainability Webinars
- ISO 14064-1 (Carbon Footprint Reporting)
- Occupational Health & Safety (OHS)
- ISO 9001, ISO 14001, ISO 45001, ISO 27001, ISO 50001
- Electricity Market Trends Training
- ERP-integrated performance management systems

## Employee Satisfaction

In addition to the work life balance practices, we maintain a participatory environment through orientation programs, complaint and suggestion boxes, ethics helpline, and periodic employee satisfaction surveys. Insights and feedback from these channels inform our workplace improvements and HR strategy.

## Freedom of Association and Social Security

As part of our [Human Resources Policy](#) and [Ethics Policy](#), we uphold our employees' rights to freedom of association, union membership and collective bargaining. While there are no unionized employees currently, several employees are active members of professional chambers. All employees (100%) are registered with Türkiye's Social Security Institution (SGK), securing national retirement and insurance coverage.

## Equality, Diversity, and Inclusion

The Company's [Human Resources Policy](#) clearly indicates that discrimination based on religion, ethnicity, gender, language, or sexual orientation is strictly prohibited.

Our Gender Equality Policy aims to increase and achieve 50% female representation across the board and in all management levels of the organization by 2030. As part of our commitment to UN WEPs, to ensure no gender pay gap, we provide equal pay for women and men doing the same work and equal promotion opportunities for women and men with the same experience. We continue to monitor diversity, equality and inclusion across the board with our HR data and metrics.



# HUMAN RESOURCES APPROACH

## Compensation and Benefits

We are committed to offering a comprehensive and competitive compensation and benefits package that supports the attraction, retention, and motivation of top talent—driving both individual and organizational success.

Our compensation strategy is benchmarked regularly using third-party market data to ensure alignment with industry standards. Salaries are reviewed and adjusted accordingly to reflect employee performance and evolving market dynamics.

In addition, our performance management framework integrates merit-based bonuses, rewarding both individual

achievement and collective success in meeting team and company objectives. This system fosters a high-performance culture and ensures alignment with our strategic vision.

## Employee Benefits

We are proud to offer a broad range of benefits that support the well-being of our employees and their families, including:

- A comprehensive health and wellness insurance program covering medical, dental, and routine check-ups
- Monthly daycare allowance for employees with children up to six years of age
- Monthly support for employees with first-degree dependents holding a disability report of 70% or more

- Monetary gifts for life milestones such as weddings and childbirths
- Service-based severance packages provided at 1, 3, 5, and 10-year milestones
- Festive monetary support during Eid celebrations
- Lunch support via a monthly digital food card

This holistic approach to compensation and benefits reflects our commitment to fostering a supportive, rewarding, and inclusive workplace.



# CUSTOMER SATISFACTION

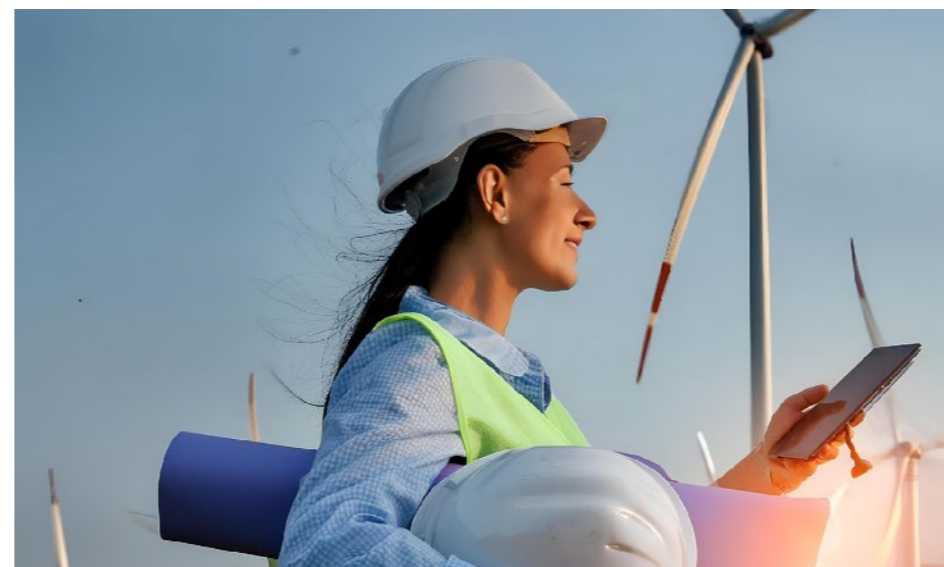
We are committed to maintaining high level of customer satisfaction through the continuous improvement of our services and the application of our **Customer Satisfaction Policy**. Our approach is grounded in honesty, fairness, transparency, and accountability in all interactions with customers and stakeholders, and is guided by our **Ethics Policy**, UN Global Compact (UNGC) principles, **Sustainability Policy**, and ESG commitments.

## Customer Engagement and Feedback Mechanisms

Customer satisfaction is managed across all three phases of the project lifecycle:

- **Pre-Project:** We engage in project scoping and planning aligned with customer needs.
- **During Project Execution:** Project managers maintain direct contact with customers, hold regular one-on-one meetings, and respond to requests and concerns through timely on-site actions.
- **Post-Project:** After system commissioning, our Operations & Maintenance (O&M) team conducts scheduled maintenance and shares customized reports to inform clients of system performance and maintenance outcomes.

We welcome customer feedback throughout all phases and provide multiple, transparent channels for communication. We conduct regular stakeholder surveys to gather customer feedback on service quality and performance and integrate this feedback into our improvement planning processes.



## Product and Service Responsibility

We systematically assess and monitor the health and safety impacts of our products and services throughout their lifecycle. In line with our product responsibility objectives:

- We operate in compliance with **ISO 45001** to ensure health and safety management for our customers and other stakeholders.
- We provide transparent information on the functioning, safety, and maintenance of our systems as part of our service offering.

## Customer Privacy and Information Security

We adhere to the principles of information security and data privacy through the implementation of **ISO 27001** and as per our **Information Security Policy**. This ensures:

- The protection of personal and corporate data belonging to our customers,
- The management of privacy risks,
- Full compliance with applicable data protection regulations.

We are committed to strengthening our customer-focused culture and aligning our business practices with evolving stakeholder expectations and ESG Standards.



# OCCUPATIONAL HEALTH AND SAFETY (OHS)

As an EPC service provider, we are committed to providing a safe and healthy work environment for all employees and contractors, in line with our **Occupational Health and Safety Policy** and our goal of **zero work-related injuries or illnesses**. We continuously improve our OHS management system, which is certified under **ISO 45001**.

We adopt a **preventive and proactive** approach to occupational risks by:

- Ensuring ongoing identification and evaluation of hazards
- Implementing measures to eliminate hazards and minimize OHS risks
- Equipping all field personnel with task-specific **Personal Protective Equipment (PPE)** before the commencement of work
- Providing regular and comprehensive OHS training to all employees and contractors to promote awareness and risk prevention

Our **Health and Safety Subcommittee** is responsible for tracking performance, monitoring compliance, and implementing corrective actions. Workers are involved in OHS planning and decision-making, in accordance with our inclusive and participatory practices.

We do not limit our OHS approach to our own operations but work to raise awareness of OHS throughout our **value chain**. Within the scope of our Supplier Policy, we expect our suppliers to comply with OHS standards. We terminate our partnership if suppliers do not meet OHS standards.

In **2024**, we recorded:

- **Zero occupational accidents**
- **Zero occupational injuries**
- **Zero occupational diseases or illnesses**
- **Zero lost workdays** due to work-related causes

These results reflect our strong commitment to a safety-first culture and our robust OHS governance practices.





# GOVERNANCE FOR RESILIENCE

Governance for Resilience

Improving Governance Systems

Strengthening Risk Management and Compliance

Improving Transparency and Accountability



# GOVERNANCE FOR RESILIENCE

Naturel Enerji is committed to embedding sustainability goals and principles across all corporate policies and business processes. Our governance approach therefore places **sustainability management at the core of every governance system**, ensuring that environmental, social, and economic performance are considered in every strategic decision.

## Material Governance Targets

We believe strong governance ensures the achievement of our corporate goals and material sustainability targets therefore, we have identified three material governance objectives:

1. Continuous improvement of governance systems
2. Strengthening risk management and compliance
3. Enhancing transparency and accountability

## Governance Structure

Our governance structure consist of the **Board of Directors, Board Committees, Executive Committee** and **Sub-committees** to ensure effective and efficient governance.

To ensure robust governance of key impact areas—including risk, ethics and discipline, sustainability, corporate governance, and audit—dedicated Board committees have been established in accordance with legal and regulatory frameworks. These committees report directly to the Board and facilitate cross-functional alignment and oversight.

For sustainability management, interdisciplinary **Subcommittees** have been formed to manage material sustainability goals. These Subcommittees, composed of full-time employees from diverse functions, report to the Executive Committee and contribute to enhanced transparency, interdepartmental collaboration, and the achievement of integrated sustainability targets.

## Board Composition and Nomination

Board selection, nomination, and performance evaluation follow the procedures set out in our Articles of Association, which embrace principles of competence, diversity, and independence. Details of directors’ collective expertise are provided in the “Board of Directors” section of our annual report and website.

BOARD OF DIRECTORS				
Early Detection of Risk Committee	Disciplinary Committee	Corporate Governance Committee	Sustainability Committee	Audit Committee
CEO		EXECUTIVE COMMITTEE		
Innovation Subcommittee	Environment Subcommittee	Stakeholder Engagement Subcommittee	Data Management Subcommittee	
Reporting Subcommittee	Waste Management Subcommittee	Supply Chain Subcommittee	Health and Safety Subcommittee	





# IMPROVING GOVERNANCE SYSTEMS

## Governance and Sustainability Oversight

Sustainability lies at the heart of our corporate purpose. We continuously align our strategic and operational goals with our material sustainability targets, adopting international best practices and embedding them into our governance systems, corporate policies, and operational processes. This approach ensures we maximize long-term value creation for all stakeholders.

- Board of Directors - the highest governance body, responsible for approving sustainability strategy, overseeing ESG integration, and monitoring progress against targets.
- Sustainability Committee- Monitors the activities of sustainability division, monitors the execution of strategy with Subcommittee, reports performance to the Board and advises the Board on new strategies.

- Executive Committee - implements Board directives and ensures cross-functional execution of sustainability objectives.
- Subcommittees - Innovation, Environment, Data Management, Waste Management, Reporting, Supply Chain, Health & Safety and Stakeholder Engagement: Each subcommittee, dedicated to sustainability goals, reports to the Sustainability Committee, CEO and the Executive Committee on progress, key metrics and improvement actions.

## Integration Mechanisms

- We continuously work on integration of better governance practices through updating of our policies, KPI tracking and ERP integration, strengthening internal and external audit systems and maintain open channels such as ethics hotline for grievances.

## Continuous Improvement

- Performance against governance objectives is reported to the Board by the Board Committees and regularly reviewed by the Board. Lessons learned inform annual updates to policies, risk registers, and subcommittee charters, driving our commitment to resilient, responsible, and transparent governance.

Through this structure, we ensure accountability, build organizational resilience, and foster a culture of continuous improvement and inclusive governance.





# STRENGTHENING RISK MANAGEMENT AND COMPLIANCE

## Our Approach to Resilience, Responsibility, and Strategic Foresight

As a climate technology, renewable energy generation and EPC services provider, our long-term value creation depends on our ability to proactively identify, assess, and manage risks and opportunities across our operations and value chain.

Our approach integrates globally recognized frameworks (eg. **GRI**, **TCFD**, **SASB**) to ensure that our governance, strategy, and risk management practices are robust, adaptive, and forward-looking.

Our governance structure ensures that sustainability and risk management are integrated at every level including **Board**, Board Committees, **Executive Committee** and **Subcommittees**.

We recognize that accelerating the transition to a low-carbon economy presents both **strategic risks**—such as regulatory uncertainty, climate-related physical impacts, and supply chain disruptions—and **strategic opportunities**, including innovation in climate technologies, digital optimization, and the expansion of renewable capacity.

By integrating climate risk and opportunity assessments into both our EPC operations and renewable energy asset management, we aim to enhance organizational resilience, seize market opportunities, and contribute to the global transition toward a just, inclusive, and low-carbon energy future.

In our [2024 Risks and Opportunities report](#), we disclose a list of material risks and opportunities in relation to sustainability and climate change.

As of 2025 we will be starting TSRS reporting which will include the financial impact of sustainability and climate change related risks and opportunities.



# IMPROVING TRANSPARENCY AND ACCOUNTABILITY

Transparency and accountability are both our corporate values, and the core principles embedded in our policies and governance structure. We recognize that transparency fosters trust and enables stakeholders to make informed decisions, while accountability reinforces our responsibility to act in line with our commitments.

## Accessible Reporting and Responsible Governance

As a publicly listed company on **Borsa Istanbul (BIST)**, we maintain a high level of disclosure through both regular and ad hoc reporting, providing stakeholders with timely and accessible information on our strategic decisions, policies, material sustainability topics, and performance. Our stakeholder engagement mechanisms, including the methods and frequency of engagement, are described in detail in the **Stakeholder Communication and Engagement section**.

To strengthen our sustainability disclosures, we established a Reporting Subcommittee, which focuses on aligning our reporting practices with international frameworks such as GRI, LSEG ESG, and the upcoming TSRS requirements. This committee plays a key role in improving data accuracy, internal controls, and reporting consistency across all ESG metrics.

We report our sustainability performance on the London Stock Exchange Group (LSEG) ESG platform, enabling transparent benchmarking of our ESG progress against peers. This approach reinforces our accountability and supports our internal performance evaluation by establishing measurable targets and KPIs across environmental, social, and governance domains.

To ensure the integrity and reliability of reported data, we continue to enhance our enterprise resource planning (ERP) systems, integrating them with updated business processes to monitor, manage, and report material data linked to sustainability KPIs and climate-related disclosures.

## Ethical Conduct

Transparency and accountability are applications of our ethical conduct in practice which sustain ethical governance, stakeholder trust, and compliance with ESG standards.

As a signatory to the **UN Global Compact (UNGC)** and under our **Ethics Policy**, we are guided by the principles of integrity, fairness, and respect in all our interactions. We maintain a **zero-tolerance policy** toward bribery,

corruption, anticompetitive behaviour, and violations of human rights. We strictly adhere to national laws and international conventions including the **UN Universal Declaration of Human Rights**.

We expect our suppliers and business partners to uphold the same ethical and compliance standards, as outlined in our **Supplier Policy**. We do not permit the use of child labour, forced or compulsory labour, or any practices that contradict children's rights, human dignity and equity.

To further institutionalize our ethical framework, we have implemented an **anonymous and confidential ethics reporting line** (etikhat@naturelenerji.com.tr), where employees and stakeholders can report any suspected ethical violations. The **Notification and Complaint Management Policy** ensures that each report is reviewed with due diligence and resolved fairly and transparently.

Through these efforts, we aim to cultivate a culture of transparency and ethical accountability that enhances our governance performance and stakeholder confidence.



# APPENDICES

UNGC Principles

UN WEPs Principles

Performance Indicators

Social Performance Indicators

Environmental Performance Indicators

GRI Content Index



# UNGC PRINCIPLES



**United Nations**  
Global Compact



## Human Rights

### Principle 1

Businesses should support and respect the protection of internationally proclaimed human rights, and

### Principle 2

make sure that they are not complicit in human rights abuses.

## Labour

### Principle 3

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

### Principle 4

The elimination of all forms of forced and compulsory labor;

### Principle 5

The effective abolition of child labor, and

### Principle 6

the elimination of discrimination in respect of employment and occupation

## Environment

### Principle 7

Businesses should support a precautionary approach to environmental challenges;

### Principle 8

Undertake initiatives to promote greater environmental responsibility, and

### Principle 9

Encourage the development and diffusion of environmentally friendly technologies

## Anti-Corruption

### Principle 10

Businesses should work against corruption in all its forms, including extortion and bribery.



# UN WEPs PRINCIPLES

In support of

## WOMEN'S EMPOWERMENT PRINCIPLES

Established by UN Women and the UN Global Compact Office

### Principle 1

Establish high-level corporate leadership for gender equality

### Principle 2

Treat all women and men fairly at work – respect and support human rights

### Principle 3

Ensure the health, safety and well-being of all women and men workers

### Principle 4

Promote education, training and professional development for women

### Principle 5

Implement enterprise development, supply chain and marketing practices that

### Principle 6

Promote equality through community initiatives and advocacy

### Principle 7

Measure and publicly report on progress to achieve gender equality



# PERFORMANCE INDICATORS

## Social Performance Indicators

Number of Employees	2023			2024		
	Women	Men	Total	Women	Men	Total
Total number of employees	31	122	153	42	153	195
White-collar employees	27	63	90	36	70	106
Blue-collar employees	4	59	63	5	84	89
Number of full-time employees	31	121	152	40	149	189
Number of part-time employees	0	1	1	0	1	1
Number of non-employee workers (subcontractors etc.)	0	0	0	0	0	0
Number of managers	2	10	12	3	9	12

Distribution of New Hires by Age Group	2023			2024		
	Women	Men	Total	Women	Men	Total
Distribution of new hires by age group	23	65	88	18	96	114
Employees under 30 years old	15	19	34	7	23	30
Employees between 30-50 years old	8	39	47	9	41	50
Employees over 50 years old	0	7	7	2	32	34

Maternity Leave	2023			2024		
	Women	Men	Total	Women	Men	Total
Number of employees entitled to maternity leave	1	0	1	1	0	1
Number of employees who took maternity leave	1	0	1	1	0	1
Number of employees returning from maternity leave	0	0	0	0	0	0
Employees over Number of employees still employed 12 months after returning from maternity leave	0	0	0	0	0	0

Distribution of Total Employees by Age Group	2023			2024		
	Women	Men	Total	Women	Men	Total
Distribution of total employees by age group:	31	122	153	41	154	195
Employees under 30 years old	15	20	35	16	27	43
Employees between 30-50 years old	15	74	89	24	87	111
Employees over 50 years old	1	28	29	1	41	41



# PERFORMANCE INDICATORS

## Social Performance Indicators

Occupational Health and Safety	2023			2024		
	Women	Men	Total	Women	Men	Total
Number of fatal injuries	0	0	0	0	0	0
Number of severe injuries	0	0	0	0	0	0
Number of workplace accidents	0	0	0	0	0	0
Number of deaths due to occupational diseases	0	0	0	0	0	0
Number of recordable occupational disease cases	0	0	0	0	0	0

Trainings	2023			2024		
	Women	Men	Total	Women	Men	Total
Total number of people trained in OHS	21	54	75	18	96	114
OHS training hours per person	48	80	128	32	80	112
Total OHS training hours (person x hour)	336	864	1200	288	1536	1824
Number of people receiving other trainings (excluding OHS)	12	35	47	11	90	101
Other training hours per person (excluding OHS)	2	4	6	1	4	5
Total other training hours (excluding OHS)(person x hour)	12	35	47	11	90	101
White-collar training hours	331	593	924	299	691	990
Blue-collar training hours	0	255	255	0	901	901

Training Average Hours	2023	2024
Average OHS training hours	7.84	9.35
Average other training hours (excluding OHS)	0.31	0.52

Other HR indicators	2023			2024		
	Women	Men	Total	Women	Men	Total
Total number of employees receiving regular performance and career development evaluation during the reporting period	23	65	88	18	96	114
Number of individuals in governance bodies (committees) in each of the following diversity categories	3	9	12	6	6	12
Number of employees from the local community (same region)	31	122	153	42	153	195

Supplier Data	2022	2023	2024
Domestic Suppliers	85	308	303
International Suppliers	39	1	15
Suppliers which relationships were terminated	0	0	0

	2024	2024
Number of Collective Bargaining Agreements	0	Turnover Rate
		20.1%



# PERFORMANCE INDICATORS

## Environmental Performance Indicators

Energy Consumption	2022	2023	2024
Total direct or indirect energy consumption (kWh)	133,346.86	159,129.30	136,746.54
Total Direct and Indirect Purchased Energy (kWh)	133,346.86	159,129.30	136,746.54

Greenhouse Gas Emissions	2024
Scope 1 (ton CO2eq)	86.21
Scope 2 (ton CO2eq)	80.10
Scope 3 (ton CO2eq)	2,547.77
Total (ton CO2eq)	2,714.08

Energy Consumption	2022	2023	2024
Total water consumption (lt)	606,000	692,000	623,100
Total freshwater consumption (lt)	0	0	0
Amount of water recycled or reused (lt)	0	0	0

Waste	2022	2023	2024
Total amount of waste generated (tons)	0.03	0.14	0.38
Total amount of nonhazardous waste generated (tons)	0.03	0.14	0.38
Total amount of hazardous waste generated (tons)	0	0	0
Total amount of waste recycled (tons)	0.03	0.14	0.38



# GRI CONTENT INDEX

Naturel Enerji reported in accordance with GRI Standards for the period between January 1, 2024 and December 31, 2024.

GRI Standard	Disclosure	Section, Page Number, Responses and/or URL
GRI 2: General Disclosures 2021	2-1 Organizational details	About the Report, pg. 3
	2-2 Entities included in the organization's sustainability reporting	About the Report, pg. 3
	2-3 Reporting period, frequency and contact point	About the Report, pg. 3
	2-4 Restatements of information	There is no restatement.
	2-5 External assurance	Based on cost-benefit analysis, no external assurance is sought for this reporting period.
	2-6 Activities, value chain and other business relationships	Sustainable Value Chain, pg. 13
	2-7 Employees	Appendices, Social Performance Indicators, pg. 45
	2-8 Workers who are not employees	Appendices, Social Performance Indicators pg. 45
	2-9 Governance structure and composition	Governance for Resilience pg. 38 Improving Governance Systems pg. 39
	2-10 Nomination and selection of the highest governance body	Governance for Resilience pg. 38 Improving Governance Systems pg. 39
	2-11 Chair of the highest governance body	Governance for Resilience, pg. 38
	2-12 Role of the highest governance body in overseeing the management of impacts	Governance for Resilience, pg. 38
	2-13 Delegation of responsibility for managing impacts	Governance for Resilience, pg. 38
	2-14 Role of the highest governance body in sustainability reporting	Governance for Resilience, pg. 38
	2-15 Conflicts of interest	Turkish Commercial Code, Article 396 and General Assembly ensures to prevent any conflicts of interest at the company Board.
	2-16 Communication of critical concerns	Improving Governance Systems, pg. 39
	2-17 Collective knowledge of the highest governance body	Improving Governance Systems, pg. 39
	2-18 Evaluation of the performance of the highest governance body	Improving Governance Systems, pg. 39



# GRI CONTENT INDEX

GRI Standard	Disclosure	Section, Page Number, Responses and/or URL
GRI 2: General Disclosures 2021	2-19 Remuneration policies	Please see the <a href="#">Remuneration Policy</a> .
	2-20 Process to determine remuneration	Please see the <a href="#">Remuneration Policy</a> .
	2-21 Annual total compensation ratio	Not disclosed due to competition dynamics.
	2-22 Statement on sustainable development strategy	Chairman, CEO and CSO's messages, pg. 5-6-7
	2-23 Policy commitments	Improving Transparency and Accountability, pg. 41
	2-24 Embedding policy commitments	The Company policies govern all activities and relationships of the company. The policies are published at the company website. They are e-mailed to employees and shared with suppliers and customers as part of our contracts. The Policy commitments are allocated to relevant departments as KPIs, actions towards which are monitored by subcommittees.
	2-25 Processes to remediate negative impacts	Improving Governance Systems, pg. 39 The Company's board committees and their processes are committed to take remedial action to improve negative impact created by the Company. <a href="#">Ethics Policy</a>
	2-26 Mechanisms for seeking advice and raising concerns	Improving Transparency, Accountability and Ethics, pg. 41
	2-27 Compliance with laws and regulations	There are no significant instances of non-compliance.
	2-28 Membership associations	Membership associations for Naturel Enerji: TÜREB, Enerji Depolama Sistemleri Derneği, Hidrojen Teknolojileri Derneği, Günder, Solarbaba
	2-29 Approach to stakeholder engagement	Stakeholder Engagement and Communication, pg. 30
	2-30 Collective bargaining agreements	Appendices, Social Performance Indicators, pg. 45
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Materiality Analysis, pg. 14
	3-2 List of material topics	Key Insights from Materiality Analysis, pg. 15
	3-3 Management of material topics	Key Insights from Materiality Analysis, pg. 15
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	Please see the <a href="#">2024 Activity Report</a> .
	201-2 Financial implications and other risks and opportunities due to climate change	No work has been done for 2024.
	201-3 Defined benefit plan obligations and other retirement plans	We do not have retirement or benefit plan for our employees.



# GRI CONTENT INDEX

GRI Standard	Disclosure	Section, Page Number, Responses and/or URL
GRI 202: Market Presence 2016	202-2 Proportion of senior management hired from the local community	Improving Governance Systems, pg. 39
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	About Naturel Enerji, pg. 9
	203-2 Significant indirect economic impacts	Please see the <a href="#">Risks and Opportunities Report</a> .
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	0
	205-2 Communication and training about anti-corruption policies and procedures	0
	205-3 Confirmed incidents of corruption and actions taken	0
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	0. Please see the <a href="#">Ethics Policy</a> .
GRI 301: Materials 2016	301-2 Materials	0
	301-3 Materials	0
GRI 302: Energy 2016	302-1 Energy consumption within the organization	Appendices, Environmental Performance Indicators, pg. 47
	302-4 Reduction of energy consumption	Increasing Energy Efficiency, pg. 19
	302-5 Reductions in energy requirements of products and services	Increasing Energy Efficiency, pg. 19
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	Water Management, pg. 25
	303-2 Management of water discharge	Water Management, pg. 25
	303-3 Water withdrawal	Water Management, pg. 25
	303-4 Water discharge	Water Management, pg. 25
	303-5 Water consumption	Water Management, pg. 25
GRI 304: Biodiversity 2016	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Protecting Biodiversity, pg. 21
	304-2 Significant impacts of activities, products and services on biodiversity	Protecting Biodiversity, pg. 21



# GRI CONTENT INDEX

GRI Standard	Disclosure	Section, Page Number, Responses and/or URL
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Emissions Management, pg. 23 Please see the <a href="#">Carbon Footprint Report</a> .
	305-2 Energy indirect (Scope 2) GHG emissions	Emissions Management, pg. 23 Please see the <a href="#">Carbon Footprint Report</a> .
	305-3 Other indirect (Scope 3) GHG emissions	Emissions Management, pg. 23 Please see the <a href="#">Carbon Footprint Report</a> .
	305-5 Reduction of GHG emissions	Emissions Management, pg. 23 Please see the <a href="#">Carbon Footprint Report</a> .
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	Emissions Management, pg. 23 Please see the <a href="#">Carbon Footprint Report</a> .
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	Waste Management, pg. 25
	306-2 Management of significant waste-related impacts	Waste Management, pg. 25
	306-3 Waste generated	Waste Management, pg. 25
	306-4 Waste diverted from disposal	Waste Management, pg. 25
	306-5 Waste directed to disposal	Waste Management, pg. 25
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	100%.
	308-2 Negative environmental impacts in the supply chain and actions taken	0. Appendices, Social Performance Indicators, pg. 46
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Appendices, Social Performance Indicators, pg. 45
	401-2 Benefits provided to full-time employees that are not provided to temporary or part	Human Resources Approach, pg. 34
	401-3 Parental leave	Appendices, Social Performance Indicators, pg. 45
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Occupational Health and Safety (OHS) Commitment, pg. 36
	403-2 Hazard identification, risk assessment, and incident investigation	Occupational Health and Safety (OHS) Commitment, pg. 36
	403-3 Occupational health services	Occupational Health and Safety (OHS) Commitment, pg. 36
	403-5 Worker training on occupational health and safety	Occupational Health and Safety (OHS) Commitment, pg. 36
	403-8 Workers covered by an occupational health and safety management system	Occupational Health and Safety (OHS) Commitment, pg. 36



# GRI CONTENT INDEX

GRI Standard	Disclosure	Section, Page Number, Responses and/or URL
GRI 403: Occupational Health and Safety 2018	403-9 Work-related injuries	Occupational Health and Safety (OHS) Commitment, pg. 36
	403-10 Work-related ill health	Occupational Health and Safety (OHS) Commitment, pg. 36
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Appendices, Social Performance Indicators, pg. 46
	404-2 Programs for upgrading employee skills and transition assistance programs	Appendices, Social Performance Indicators, pg. 46
	404-3 Percentage of employees receiving regular performance and career development reviews	Appendices, Social Performance Indicators, pg. 46
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Appendices, Social Performance Indicators, pg. 46
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	Incidents of discrimination is 0.
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	0
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	0
GRI 411: Rights of Indigenous Peoples 2016	411-1 Incidents of violations involving rights of indigenous peoples	NA.
GRI 413: Local Communities 2016	413-2 Operations with significant actual and potential negative impacts on local communities	0
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	100%.
	414-2 Negative social impacts in the supply chain and actions taken	0. Appendices, Social Performance Indicators, pg. 46
GRI 415: Public Policy 2016	415-1 Political contributions	0
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories	Occupational Health and Safety (OHS) Commitment, pg. 36
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	0
GRI 417: Marketing and Labeling 2016	417-2 Incidents of non-compliance concerning product and service information and labeling	0
	417-3 Incidents of non-compliance concerning marketing communications	0
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	0



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