SABANCI HOLDİNG A.Ş. - Water Security 2023

W0. Introduction

W0.1

(W0.1) Give a general description of and introduction to your organization.

Hacı Ömer Sabancı Holding A.Ş. (Sabancı Holding), Türkiye's leading conglomerate, is a strategic investment holding engaged in a wide variety of business activities through its subsidiaries and affiliates, mainly in the banking, financial services, energy, industrials, building materials, digital and retail sectors. Sabancı Holding is domiciled in the Republic of Türkiye, with headquarters in İstanbul.

Sabancı Holding coordinates and supports the finance, strategy, business development, legal, human capital and sustainability functions of Group companies. The Holding aims to ensure that Group companies operate in a manner that is profitable and sustainable with favorable competitive conditions. In addition, Sabancı Holding sets and monitors the corporate governance practices that apply across Sabancı Group.

In 2022, Sabancı Group reported combined revenue of TL 404 billion and consolidated net income of TL 44 billion. Sabancı Holding's own shares, as well as the shares of its 11 subsidiaries, are listed on Borsa Istanbul (BIST) and constitute 6.0% of the total market capitalization of the Turkish equity market. The Sabancı Family is collectively Sabancı Holding's majority shareholder. As of year-end 2022, 50% of Sabancı Holding's shares are publicly traded.

Sabancı Holding's executive activities are carried out by the Executive Committee, consisting of the CEO, CFO, Strategic Business Unit Presidents and the Group President of Human Resources and Sustainability. The Executive Committee reports to the Board of Directors.

Sabancı Holding considers sustainability as an integral part of its mission and strategy. As part of the rapid and sharp transformation based on technology and sustainability, Group's purpose is defined as "We unite Turkey and the World for a sustainable life with leading enterprises."

Within Sabancı Holding's 5-year strategy plan there are 5 strategic directions that will lead the Group to its purpose: Transform into an agile global / local footprint, Lead in digital, material and climate technologies, Commercialize innovation for a better life, Pioneer in "sustainability as a business", Adapt to Future of Work. The Group steadily supports and strengthens these 5 strategic directions with its investments in technology and digital.

In 2020, Sustainability Roadmap was created and the potential areas to increase the Group's positive impact were determined. The Sustainability Roadmap, which was approved by the Executive Board and the Board of Directors in 2021, includes Group-wide actions on water, alongside with other material issues. Moving forward with the goal of achieving Net-Zero Emissions and Zero Waste in all operations by 2050, Sabancı Holding started to take approximately 80 detailed actions to implement the Sustainability Roadmap in 2021. By the end of December 2022, %58 of the actions were either commenced or completed. The Holding also began measuring the key performance indicators for each pillar of Sustainability Roadmap in 2021 and received third party verification services for these data for the entire Group.

At Sabancı Group, we see water as a fundamental natural capital for all sectors in which we operate. We are aware that disruption in water supply will adversely affect all business processes. Accordingly, we define our impact on water resources on an industry basis, and carry out studies focused on efficiency, recovery, and savings to manage water in a sustainable manner.

Across the Group, the percentage of water recycled and reused in 2022 was at 31%. In the future, we will continue to give priority to increasing water efficiency through projects, especially in water and emission-intensive sectors.

Detailed information on Sabancı Holding's water management approach is published on 2022 Sabancı Holding Sustainability Report, which can be accessed on Sabancı Holding's Investor Relations Website.

W0.2

(W0.2) State the start and end date of the year for which you are reporting data.

	Start date	End date
Reporting year	January 1 2022	December 31 2022

W0.3

(W0.3) Select the countries/areas in which you operate.

Turkey

W0.4

(W0.4) Select the currency used for all financial information disclosed throughout your response.

TRY

W0.5

(W0.5) Select the option that best describes the reporting boundary for companies, entities, or groups for which water impacts on your business are being reported.

Companies, entities or groups in which an equity share is held

W0.6

(W0.6) Within this boundary, are there any geographies, facilities, water aspects, or other exclusions from your disclosure?

No

W0.7

(W0.7) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?

Indicate whether you are able to provide a unique identifier for your organization.	Provide your unique identifier
Yes, an ISIN code	TRASAHOL91Q5

W1. Current state

W1.1

(W1.1) Rate the importance (current and future) of water quality and water quantity to the success of your business.

	Direct use importance rating	Indirect use importance rating	Please explain
Sufficient amounts of good quality freshwater available for use	Vital	Important	CURRENT Direct: Sabancı Group's direct water usage consists of the water drawn to be used in the processes of investee companies and the water used for drinking, cleaning, sanitation, and hygiene purposes. Our investee companies operate in a range of diverse sectors including water intense & manufacturing sectors (energy generation incl. hydropower, building materials, etc.). The availability and quality of water for direct use of our value chain are vital in terms of the continuity of the operations and operational costs of our value chain. Indirect: In the indirect use of water, our suppliers are taken into consideration. If our manufacturing companies experience any disruption in raw material supply due to water-related risks, it can lead to operational disruptions. Additionally, any disruptions in the supply of clean drinking water can have adverse effects, especially on our employees, and may affect our WASH services. Therefore, it is considered important. FUTURE Direct: In different sectors, various actions are taken to address water-related challenges. These actions include improving water efficiency, adopting non-water dependent energy sources like wind and solar, water reuse and recycling, using digitalization and technology to manage water consumption, rainwater harvesting, and detecting and repairing leaks. Despite significant efforts to reduce dependency on water resources in our value chain, certain investments, such as hydropower generation, will still rely on water availability. Over the next 5 years, as we implement water-efficient practices, our water dependency will decrease. However, considering the potential increase in water scarcity in the mid-term, the rating for direct water usage might be evaluated as "vital" in the future. Indirect: Given the fact that climate emergency will deepen the water-related impacts on some suppliers, the indirect use of water rating will stay as vital in 5 years' time.
Sufficient amounts of recycled, brackish and/or produced water available for use	Neutral	Neutral	CURRENT Direct: As a Holding company, which invests in a range of diverse sectors including water intense & manufacturing sectors (e.g. building materials), sufficient amounts of recycled, brackish and/or produced water available for use is vital for us in terms of continuity of the operations and operational costs of our value chain. Since water-intense manufacturing technologies may face a number of risks including those that are reputational, physical or those related to changing consumer behavior, our value chain is constantly investing in recycling/reuse processes. As a result of such efforts the rate of water that Sabancı Group companies saved through programs such as recycling and reuse was 31% in 2022 . Currently, the importance level of this water is neutral. Indirect: The significance level is considered neutral because some of our suppliers may be using recycled water in their operations. FUTURE Direct: We believe the importance rating will increase to "important" in 5 years' time, since most of our operations may need to rely on recycled, brackish, and/or produced water due to a potential scarcity in water supply in the mid-term. Indirect: We anticipate that the utilization of recycled water by suppliers will grow in the future, driven by water shortages in regions expected to experience water deficits.

W1.2

(W1.2) Across all your operations, what proportion of the following water aspects are regularly measured and monitored?

	% of sites/facilities/operations	Frequency of measurement	Method of measurement	Please explain
Water withdrawals – total volumes	100%	Monthly	As Sabancı Group, we monitor our water withdrawals on a monthly basis according to their sources, using meters and bills. The collected data is reported to the Sustainability Department of the Holding by the sustainability and environmental units of the group companies. Within the Holding, the Center Management department is responsible for the data collection process. The Sustainability Department monitors the performance annually by obtaining the relevant data from the center management.	Sabancı Holding conducts water calculations for its operations using the equity share approach, where "Operations" refers to all investee companies operating in the sectors of banking, financial services, energy, industrials, building materials, retail and digital, and the holding itself. Our operations' total water withdrawal volume includes municipal water, surface water, groundwater, rainwater, and third-party water usage. We analyze our impact on water resources from an industrial perspective and conduct studies focused on efficiency, recovery, and conservation to ensure sustainable water management. Therefore, we consistently monitor our water withdrawals by categorizing them according to their sources, and our withdrawal volumes are verified by third parties.
Water withdrawals – volumes by source	100%	Monthly	As Sabancı Group, we monitor our water withdrawals on a monthly basis according to their sources, using meters and bills. The collected data is reported to the Sustainability Department of the Holding by the sustainability and environmental units of the group companies. Within the Holding, the Center Management department is responsible for the data collection process. The Sustainability Department monitors the performance annually by obtaining the relevant data from the center management.	Sabancı Holding conducts water calculations for its operations using the equity share approach, where "Operations" refers to all investee companies operating in the sectors of banking, financial services, energy, industrials, building materials, retail and digital, and the holding itself. Our operations' total water withdrawal volume includes municipal water, surface water, groundwater, rainwater, and third-party water usage. We analyze our impact on water resources from an industrial perspective and conduct studies focused on efficiency, recovery, and conservation to ensure sustainable water management. Therefore, we consistently monitor our water withdrawals by categorizing them according to their sources, and our withdrawal volumes are verified by third parties.
Entrained water associated with your metals & mining and/or coal sector activities - total volumes [only metals and mining and coal sectors]	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>

	% of sites/facilities/operations	Frequency of measurement	Method of measurement	Please explain
Produced water associated with your oil & gas sector activities - total volumes [only oil and gas sector]	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Water withdrawals quality	100%	Monthly	In the supply of drinking water, the supplier's compliance with Drinking Water Quality Standards is tracked through the supplier's analysis reports. Moreover, the municipal water supplied through the network meets the required quality standards. Additionally, our manufacturing companies monitor the quality of the water drawn by taking samples from the process inlet water.	Our operations' total water withdrawal volume includes municipal water, surface water, groundwater, rainwater, and third-party water usage. The quality of drinking water can directly impact the health and satisfaction of our employees. Additionally, since water drawn for use in processes can potentially affect the products we manufacture and the equipment we use, it is crucial for it to be of sufficient quality. Therefore, the quality of the water drawn is monitored on a monthly basis.
Water discharges – total volumes	100%	Monthly	As Sabancı Group, we monitor our water discharges on a monthly basis, using meters and bills. The collected data is reported to the Sustainability Department of the Holding by the sustainability and environmental units of the group companies. Within the Holding, the Center Management department is responsible for the data collection process. The Sustainability Department monitors the performance annually by obtaining the relevant data from the center management.	Sabancı Holding conducts water calculations for its operations using the equity share approach, where "Operations" refers to all investee companies operating in the sectors of banking, financial services, energy, industrials, building materials, retail and digital, and the holding itself. Water drawn from municipal water, surface water, groundwater, rainwater, and third-party sources is used for various purposes and subsequently discharged as wastewater. Monitoring water discharge volumes on a monthly basis is an essential part of our efforts to manage our impact on resources and enhance the efficiency of our water usage. Our goal is to reduce our environmental impact by implementing necessary measures to minimize wastewater discharge.
Water discharges – volumes by destination	100%	Monthly	As Sabancı Group, we monitor our water discharges volumes by destination on a monthly basis, using meters and bills. The collected data is reported to the Sustainability Department of the Holding by the sustainability and environmental units of the group companies. Within the Holding, the Center Management department is responsible for the data collection process. The Sustainability Department monitors the performance annually by obtaining the relevant data from the center management.	As part of our Environmental Policy, we commit to complying with environmental laws, regulations, and other legal requirements. We establish and implement environmental standards beyond legal obligations as a part of our corporate responsibility. Therefore, our companies, particularly those in the manufacturing sector, treat process water before discharging it into the receiving environment.
Water discharges – volumes by treatment method	100%	Monthly	As Sabancı Group, we monitor our water discharges volumes by treatment method on a monthly basis, using meters and bills. The collected data is reported to the Sustainability Department of the Holding by the sustainability and environmental units of the group companies. Within the Holding, the Center Management department is responsible for the data collection process. The Sustainability Department monitors the performance annually by obtaining the relevant data from the center management.	Sabancı Group regularly tracks the discharge volume, discharge point, treatment method, and volume data according to the method in order to determine and monitor its impact on natural resources. In our operations, which include all investee companies operating in the sectors of banking, financial services, energy, industrials, building materials, retail, and digital, as well as the holding itself, there are various wastewater treatment methods such as secondary treatment, tertiary treatment, discharge to the natural environment without treatment, and discharge to third parties without treatment. Every municipality has legal regulations regarding the treatment and discharge of wastewater. We ensure compliance with these legal regulations by regularly monitoring and appropriately implementing treatment methods.
Water discharge quality – by standard effluent parameters	100%	Monthly	Samples are taken from wastewater and analyzed in laboratories. These analyses include the examination of parameters such as total suspended solids, chemical oxygen demand, pH, oil and grease, and temperature.	As part of our Environmental Policy, we commit to complying with environmental laws, regulations, and other legal requirements. We establish and implement environmental standards beyond legal obligations as a part of our corporate responsibility. Therefore, our companies, particularly those in the manufacturing sector, treat process water before discharging it into the receiving environment. The discharged wastewater must comply with the regulations outlined in the Wastewater Discharge Regulation. For this reason, the water discharge quality by standard effluent parameters is monitored on a monthly basis.
Water discharge quality – emissions to water (nitrates, phosphates, pesticides, and/or other priority substances)	Not relevant	<Not Applicable>	<Not Applicable>	The monitoring of these parameters is not legally required. Therefore, currently, these parameters are not being tracked by the Holding. However, some of our manufacturing companies voluntarily monitor relevant parameters in their analyses but are not obligated to report to the Holding. If there are changes in laws, this parameter may be monitored at the group level in the future.
Water discharge quality – temperature	100%	Monthly	Samples are taken from wastewater and analyzed in laboratories. These analyses include the examination of parameters such as total suspended solids, chemical oxygen demand, pH, oil and grease, and temperature.	As part of our Environmental Policy, we commit to complying with environmental laws, regulations, and other legal requirements. We establish and implement environmental standards beyond legal obligations as a part of our corporate responsibility. Therefore, our companies, particularly those in the manufacturing sector, treat process water before discharging it into the receiving environment. The discharged wastewater must comply with the regulations outlined in the Wastewater Discharge Regulation. For this reason, the water discharge quality by standard effluent parameters including temperature is monitored on a monthly basis.
Water consumption – total volume	100%	Monthly	In 2022, Sabancı Holding utilized the equity share approach to calculate its water data. Within our consolidated accounts, the water consumption volume was determined as the difference between "water withdrawal" and "water discharges."	Sabancı Holding conducts water calculations for its operations using the equity share approach, where "Operations" refers to all investee companies operating in the sectors of banking, financial services, energy, industrials, building materials, retail and digital, and the holding itself. The water consumption volume consists of drinking water, reused water, used water in products and evaporated water. Monitoring water consumption is essential to improve water usage efficiency. Therefore, we monitor our water consumption on a monthly basis.
Water recycled/reused	100%	Monthly	As Sabancı Group, we monitor our recycled and reused water volumes on a monthly basis, using meters. The collected data is reported to the Sustainability Department of the Holding by the sustainability and environmental units of the group companies. Within the Holding, the Center Management department is responsible for the data collection process. The Sustainability Department monitors the performance annually by obtaining the relevant data from the center management.	Treating and reusing wastewater allows us to manage water resources more efficiently and improve the effectiveness of our water usage. Our investees, especially those operating in the manufacturing sector with high water usage, have goals to increase reused water utilization. Monitoring this parameter on a monthly basis plays a crucial role in facilitating our progress of water-target and reducing our environmental impact.

	% of sites/facilities/operations	Frequency of measurement	Method of measurement	Please explain
The provision of fully-functioning, safely managed WASH services to all workers	100%	Continuously	As Sabancı Group, we conduct routine assessments of WASH infrastructure, conduct water quality tests, and collect input from employees. Additionally, we perform regular audits to ensure compliance with established standards.	We implement necessary measures to ensure the availability of safe drinking water, monitor and enhance sanitation infrastructure, and establish hygiene standards within our workplaces, all with the purpose of promoting the health and well-being of our employees and stakeholders. Our goal is to encourage sustainable water resource management, secure access to safe drinking water, enhance sanitation infrastructure, and enforce hygiene standards. Therefore, we conduct regular monitoring of drinking water and water supply quality, taking into consideration feedback from employees.

W1.2b

(W1.2b) What are the total volumes of water withdrawn, discharged, and consumed across all your operations, how do they compare to the previous reporting year, and how are they forecasted to change?

	Volume (megaliters/year)	Comparison with previous reporting year	Primary reason for comparison with previous reporting year	Five-year forecast	Primary reason for forecast	Please explain
Total withdrawals	5111.85	About the same	Increase/decrease in efficiency	Lower	Increase/decrease in efficiency	Sabancı Holding conducts water calculations for its operations using the equity share approach, where "Operations" refers to all investee companies operating in the sectors of banking, financial services, energy, industrials, building materials, retail and digital, and the holding itself. Our operations' total water withdrawal volume includes municipal water, surface water, groundwater, rainwater, and third-party water usage. In 2021, the total water withdrawal volume was 5,390.04 megaliters. Due to the efficiency measures and water-smart technologies implemented across the group, this value decreased to 5,111.85 megaliters in 2022. We consider this 5% decrease to be "about the same" based on the following threshold: - If the difference is less than 10%: it is considered about the same. - If the difference is between 10% and 20%: it is considered higher or lower. - If the difference is greater than 20%: it is considered much higher or much lower. We acknowledge the potential adverse impact of water supply disruptions on all business processes. As a result, we assess our influence on water resources from an industry perspective and conduct studies focused on efficiency, recovery, and savings to ensure sustainable water management. In pursuit of these goals, our investee companies, particularly those with high water usage, are making investments and taking action to reduce water withdrawal and increase the proportion of reused water. We have prepared a 5-year strategy plan. According to this plan, we anticipate a decrease in our water withdrawal volume in the coming years.
Total discharges	818.26	Higher	Increase/decrease in business activity	About the same	Increase/decrease in efficiency	Sabancı Holding conducts water calculations for its operations using the equity share approach, where "Operations" refers to all investee companies operating in the sectors of banking, financial services, energy, industrials, building materials, retail and digital, and the holding itself. Water drawn from municipal water, surface water, groundwater, rainwater, and third-party sources is used for various purposes and subsequently discharged as wastewater. It is important to note that the majority of the water withdrawn is utilized in the processes of our investees' manufacturing plants. Various treatment methods are employed in these plants to recycle and reuse a significant portion of the drawn water. In 2021, the total water discharge volume was 725.43 megaliters. The increase in business activity, especially in production facilities, increased water discharges to 818.26 megaliters in 2022. We consider this 13% increase to be "higher" based on the following threshold: - If the difference is less than 10%: it is considered about the same. - If the difference is between 10% and 20%: it is considered higher or lower. - If the difference is greater than 20%: it is considered much higher or much lower. We assess our influence on water resources from an industry perspective and conduct studies on efficiency, recovery, and savings to ensure sustainable water management. In pursuit of these goals, our investee companies, particularly those with high water usage, are making investments and taking action to increase the proportion of reused water and reduce water discharge. We have prepared a 5-year strategy plan. According to this plan, we anticipate a significant decrease in our water discharge volume in the coming years.
Total consumption	4293.59	About the same	Increase/decrease in efficiency	Lower	Investment in water-smart technology/process	Sabancı Holding conducts water calculations for its operations using the equity share approach, where "Operations" refers to all investee companies operating in the sectors of banking, financial services, energy, industrials, building materials, retail and digital, and the holding itself. The water consumption volume consists of drinking water, reused water, used water in products and evaporated water. For the calculation of consolidated data for total consumption volume at the Group level, the "Consumption=Withdrawal-Discharge" approach has been applied. In 2021, the total water consumption volume was 4,664.60 megaliters. Due to the efficiency measures and water-smart technologies implemented across the investees, there is a decrease in water consumption to 4,293.59 megaliters in 2022. We consider this 8% decrease to be "about the same" based on the following threshold: - If the difference is less than 10%: it is considered about the same. - If the difference is between 10% and 20%: it is considered higher or lower. - If the difference is greater than 20%: it is considered much higher or much lower. We assess our influence on water resources from an industry perspective and conduct studies on efficiency, recovery, and savings to ensure sustainable water management. In pursuit of these goals, our investee companies, particularly those with high water usage, are making investments and taking action to increase the proportion of reused water and reduce the amount of evaporated water. We have prepared a 5-year strategy plan. According to this plan, we anticipate that our water consumption volume will be lower with these actions.

W1.2d

(W1.2d) Indicate whether water is withdrawn from areas with water stress, provide the proportion, how it compares with the previous reporting year, and how it is forecasted to change.

	Withdrawals are from areas with water stress	% withdrawn from areas with water stress	Comparison with previous reporting year	Primary reason for comparison with previous reporting year	Five-year forecast	Primary reason for forecast	Identification tool	Please explain
Row 1	Yes	76-99	About the same	Increase/decrease in efficiency	Lower	Investment in water-smart technology/process	WRI Aqueduct	Sabancı Holding uses the WRI Aqueduct Tool to assess water-related risks. This tool conducts analyses specific to the local basin breakdown in Turkey, evaluating factors such as water stress risk and water pollution levels, and also provides future scenario analysis. We conduct yearly assessments of water stress risk for each facility by inputting their latitude and longitude into the Tool, which then categorizes them according to their risk conditions. The majority of our operations are conducted in regions with a high water stress risk level. When comparing the volume of water withdrawn from regions with high and extremely high water stress risk in 2022 and 2021, we consider a 5% decrease due to the efficiency measures and water-smart technologies implemented across the investees. We classify this decrease as 'about the same' based on the following threshold: Differences under 10% are categorized as 'about the same,' differences between 10% and 20% are considered 'higher or lower,' and differences over 20% are classified as 'much higher or much lower.' We acknowledge the potential adverse impact of water supply disruptions on all business processes. As a result, we assess our influence on water resources from an industry perspective and conduct studies focused on efficiency, recovery, and savings to ensure sustainable water management. In pursuit of these goals, our investee companies, particularly those with high water usage, are making investments and taking action to reduce water withdrawal and increase the proportion of reused water. We have started a new project on water to assess and reduce our dependencies on water across the investees. According to this plan, we anticipate a decrease in our water withdrawal volume in the coming years.

W1.2h

(W1.2h) Provide total water withdrawal data by source.

	Relevance	Volume (megaliters/year)	Comparison with previous reporting year	Primary reason for comparison with previous reporting year	Please explain
Fresh surface water, including rainwater, water from wetlands, rivers, and lakes	Relevant	216.16	Much lower	Increase/decrease in efficiency	As Sabancı Group, we only use surface water in three of our investees, and the majority of this usage is attributed to our energy generation company, which uses fresh water as cooling water in the processes. Additionally, four of our companies utilize rainwater in their activities for irrigation and cleaning of buildings. The total water withdrawal from these two sources was 614.69 megaliters in 2021, which decreased to 216.16 megaliters in 2022 because of the efficiency measures. We evaluate this 65% decrease as "much lower" based on the following threshold: Differences under 10% are "about the same," 10%-20% are "higher or lower," and over 20% are "much higher or much lower." We anticipate a slight increase in the usage volume of rainwater due to some of our companies starting rainwater harvesting system installations and existing users expanding this system. However, given the annual decrease in rainfall rates, we expect the usage of this resource to remain about the same.
Brackish surface water/Seawater	Not relevant	<Not Applicable>	<Not Applicable>	<Not Applicable>	According to the assured data, we mainly use rainwater, surface water, non-renewable groundwater, and water obtained from third-party sources. Therefore, this resource is irrelevant. However, there might be changes in this usage in the future due to improvements made by production companies on data collection and assurance process.
Groundwater – renewable	Not relevant	<Not Applicable>	<Not Applicable>	<Not Applicable>	According to the assured data, we mainly use rainwater, surface water, non-renewable groundwater, and water obtained from third-party sources. We do not use renewable groundwater. Therefore, this resource is irrelevant. However, there might be changes in this usage in the future due to improvements made by production companies on data collection and assurance process.
Groundwater – non-renewable	Relevant	4173.95	About the same	Increase/decrease in business activity	As Sabancı Group, we use non-renewable groundwater water only in six of our investees. The groundwater is utilized as process water for cooling purposes and/or as an input for the products (e.g. in clinker production or in electricity generation facilities as cooling water). The total water withdrawal from groundwater was 4,346.52 megaliters in 2021, which decreased to 4,173.95 megaliters in 2022 because of the reduced production in energy generation plants using groundwater for cooling purposes and efficiency measures. We evaluate this 4% decrease as "about the same" based on the following threshold: Differences under 10% are "about the same," 10%-20% are "higher or lower," and over 20% are "much higher or much lower." Anticipated forward trend is 'about the same' due to the neutralizing effect of a potential increase in production on water efficiency measures.
Produced/Entrained water	Not relevant	<Not Applicable>	<Not Applicable>	<Not Applicable>	According to the assured data, we mainly use rainwater, surface water, non-renewable groundwater, and water obtained from third-party sources. We do not use produced/entrained water. Therefore, this resource is irrelevant.
Third party sources	Relevant	721.75	Much higher	Increase/decrease in business activity	As Sabancı Group, the majority of our water withdrawal from third-party sources consists of municipal water and drinking water. Municipal water is used for cleaning purposes in companies that have only domestic water usage, while in manufacturing companies, it is also utilized in their processes. Furthermore, water purchased through tankers for specific facility needs by one of our companies is also included in this water source. The total water withdrawal from groundwater was 391.23 megaliters in 2021, which increased to 721.75 megaliters in 2022 because of the increased operations and the higher number of employees. We evaluate this 84% increase as "much higher" based on the following threshold: Differences under 10% are "about the same," 10%-20% are "higher or lower," and over 20% are "much higher or much lower." Anticipated forward trend is 'about the same' due to the neutralizing effect of a potential increase in production & employees on water efficiency measures.

W1.2i

(W1.2i) Provide total water discharge data by destination.

	Relevance	Volume (megaliters/year)	Comparison with previous reporting year	Primary reason for comparison with previous reporting year	Please explain
Fresh surface water	Relevant	55.57	About the same	Increase/decrease in business activity	As Sabancı Group, in the year 2022, 7% of our wastewater has been estimated to be discharged to fresh surface water. In 2022, one of our investee companies, which operates in the building materials sector, discharges wastewater to the natural environment without treatment. The total water discharge to fresh surface water was 53.10 megaliters in 2021, which increased to 55.57 megaliters in 2022 because of the increase in production. We evaluate this 5% increase as "about the same" based on the following threshold: Differences under 10% are "about the same," 10%-20% are "higher or lower," and over 20% are "much higher or much lower." The reason for this increase is primarily due to increase in business activity.
Brackish surface water/seawater	Not relevant	<Not Applicable>	<Not Applicable>	<Not Applicable>	According to the assured data, we only discharge our wastewater to fresh water and third-party destinations. Therefore, using brackish surface water or seawater as a discharge destination is irrelevant. However, there might be changes in this usage in the future due to improvements made by production companies on data collection and assurance process.
Groundwater	Not relevant	<Not Applicable>	<Not Applicable>	<Not Applicable>	According to the assured data, we only discharge our wastewater to fresh water and third-party destinations. Therefore, using groundwater as a discharge destination is irrelevant. However, there might be changes in this usage in the future due to improvements made by production companies on data collection and assurance process.
Third-party destinations	Relevant	762.69	Higher	Increase/decrease in business activity	As Sabancı Group, in the year 2022, 93% of our wastewater has been discharged through secondary treatment, tertiary treatment, and/or directly to third-party destinations without treatment. The total water discharge to third-party destinations, which are the municipalities' sewer connections, water was 672.33 megaliters in 2021, which increased to 762.69 megaliters in 2022 due to the increase in business activity. We evaluate this 13% increase as "higher" based on the following threshold: Differences under 10% are "about the same", 10%-20% are "higher or lower", and over 20% are "much higher/lower" Our investee companies, particularly those with high water usage, are making investments to increase the proportion of reused water and reduce water discharge. According to a new project on water across our investees, we anticipate a decrease in our water discharge volume in the coming years.

W1.2j

(W1.2j) Within your direct operations, indicate the highest level(s) to which you treat your discharge.

	Relevance of treatment level to discharge	Volume (megaliters/year)	Comparison of treated volume with previous reporting year	Primary reason for comparison with previous reporting year	% of your sites/facilities/operations this volume applies to	Please explain
Tertiary treatment	Relevant	30.2	Much higher	Increase/decrease in business activity	1-10	Sabancı Group regularly tracks the discharge volume, discharge point, treatment method, and volume data according to the method in order to determine and monitor its impact on natural resources. All investees report this information to the Holding annually and Holding verifies the data collected from the subsidiary companies both independently and through a third party to ensure accuracy. Once the data is validated, the Holding calculates its consolidated data using the equity share approach. In 2022, only one of our investee companies, which operates in the building materials sector, applies tertiary treatment. In 2021, the volume of water treated with tertiary treatment and discharged outside the facility was 18.34 megaliters. However, in 2022, this volume increased by 65% to 30.20 megaliters. We evaluate this 65% increase as "much higher" based on the following threshold: Differences under 10% are "about the same", 10%-20% are "higher or lower", and over 20% are "much higher/lower". The reason for this increase is primarily due to increase in business activity.
Secondary treatment	Relevant	153.37	Much higher	Increase/decrease in business activity	21-30	Sabancı Group regularly tracks the discharge volume, discharge point, treatment method, and volume data according to the method in order to determine and monitor its impact on natural resources. All investees report this information to the Holding annually and Holding verifies the data collected from the subsidiary companies both independently and through a third party to ensure accuracy. Once the data is validated, the Holding calculates its consolidated data using the equity share approach. In 2022, three of our investee companies, which operate in the industrial, and energy sectors, apply secondary treatment. In 2021, the volume of water treated with secondary treatment and discharged outside the facility was 126.20 megaliters. However, in 2022, this volume increased by 22% to 153.37 megaliters. We evaluate this 22% increase as "much higher" based on the following threshold: Differences under 10% are "about the same", 10%-20% are "higher or lower", and over 20% are "much higher/lower". The reason for this increase is primarily due to increase in business activity.
Primary treatment only	Not relevant	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	In 2022, our wastewater has been discharged e to the natural environment without treatment and through secondary treatment, tertiary treatment, and/or directly to third-party destinations without treatment. Therefore, primary treatment as a discharge method is irrelevant. However, there might be changes in this method in the future due to improvements made by production companies.
Discharge to the natural environment without treatment	Relevant	55.57	About the same	Increase/decrease in business activity	1-10	Sabancı Group regularly tracks the discharge volume, discharge point, treatment method, and volume data according to the method in order to determine and monitor its impact on natural resources. All investees report this information to the Holding annually and Holding verifies the data collected from the subsidiary companies both independently and through a third party to ensure accuracy. Once the data is validated, the Holding calculates its consolidated data using the equity share approach. In 2022, one of our investee companies, which operates in the building materials sector, discharges wastewater to the natural environment without treatment. In 2021, this volume was 53.10 megaliters. However, in 2022, it increased by 5% to 55.57 megaliters. We evaluate this 5% increase as "about the same" based on the following threshold: Differences under 10% are "about the same", 10%-20% are "higher or lower", and over 20% are "much higher/lower". The reason for this decrease is primarily due to increase in business activity.
Discharge to a third party without treatment	Relevant	579.11	Higher	Increase/decrease in business activity	81-90	Sabancı Group regularly tracks the discharge volume, discharge point, treatment method, and volume data according to the method in order to determine and monitor its impact on natural resources. All investees report this information to the Holding annually and Holding verifies the data collected from the subsidiary companies both independently and through a third party to ensure accuracy. Once the data is validated, the Holding calculates its consolidated data using the equity share approach. Most of our operations discharge wastewater to municipalities' sewer connections without treatment. In 2021, the volume of discharged water to a third party without treatment was 521.53 megaliters. However, in 2022, this volume increased by 11% to 579.11 megaliters. We evaluate this 11% increase as "higher" based on the following threshold: Differences under 10% are "about the same", 10%-20% are "higher or lower", and over 20% are "much higher/lower". The reason for this increase is the increase in business activity at the group level.
Other	Not relevant	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	In our operations, besides the methods mentioned above, no other treatment method is applied.

W1.3

(W1.3) Provide a figure for your organization's total water withdrawal efficiency.

	Revenue	Total water withdrawal volume (megaliters)	Total water withdrawal efficiency	Anticipated forward trend
Row 1	4035706 44000	5111.85	78948060. 6825318	As a component of Holding's Sustainability Roadmap, our objective is to diminish our impact on natural resources while simultaneously boosting revenue through a sustainable growth approach. By employing efficiency measures and investing in water-smart technology throughout the organization, we anticipate a reduction in water withdrawal volume. Consequently, this decrease in water withdrawal volume is expected to enhance water withdrawal efficiency as our revenue increases.

W1.4

(W1.4) Do any of your products contain substances classified as hazardous by a regulatory authority?

	Products contain hazardous substances	Comment
Row 1	No	N/A

W1.5

(W1.5) Do you engage with your value chain on water-related issues?

	Engagement	Primary reason for no engagement	Please explain
Suppliers	Yes	<Not Applicable>	<Not Applicable>
Other value chain partners (e.g., customers)	Yes	<Not Applicable>	<Not Applicable>

W1.5a

(W1.5a) Do you assess your suppliers according to their impact on water security?

Row 1

Assessment of supplier impact

Yes, we assess the impact of our suppliers

Considered in assessment

Basin status (e.g., water stress or access to WASH services)
Supplier dependence on water
Supplier impacts on water availability
Supplier impacts on water quality

Number of suppliers identified as having a substantive impact

7

% of total suppliers identified as having a substantive impact

1-25

Please explain

CarrefourSA, one of our investees operating in the retail sector, primarily focuses on evaluating the water management practices of its private-label product suppliers. Since CarrefourSA sources its private-label products from 57 suppliers, it categorizes those suppliers whose annual water usage is 1000 m3 or more as significant impact suppliers, totaling 7 in number. Out of these seven suppliers, two operate in regions with an extremely high water stress risk level, four operate in regions with a high level, and one operates in a region with a medium-high level of water stress. CarrefourSA prioritizes these suppliers in risk assessment processes since any disruption in their production caused by water scarcity can lead to challenges in the supply of various products, ranging from cleaning materials to drinking water. Therefore, CarrefourSA evaluates the basin status water dependency, and the impact on water availability and quality in the regions where these suppliers operate.

W1.5b

(W1.5b) Do your suppliers have to meet water-related requirements as part of your organization's purchasing process?

	Suppliers have to meet specific water-related requirements	Comment
Row 1	Yes, water-related requirements are included in our supplier contracts	<Not Applicable>

W1.5c

(W1.5c) Provide details of the water-related requirements that suppliers have to meet as part of your organization's purchasing process, and the compliance measures in place.

Water-related requirement
Providing fully-functioning, safely managed WASH services to all workers

% of suppliers with a substantive impact required to comply with this water-related requirement
100%

% of suppliers with a substantive impact in compliance with this water-related requirement
100%

Mechanisms for monitoring compliance with this water-related requirement
Fines and penalties
Off-site third-party audit
On-site third-party audit
Supplier scorecard or rating

Response to supplier non-compliance with this water-related requirement
Retain and engage

Comment
We have developed a Responsible Investment Policy to guide capital allocation and investment decisions and to ensure the sustainability of the value chain. Our investee companies are expected to inform all their suppliers, prioritized business partners, and customers about this Policy. As stated in our policy, the investee companies, suppliers, and customers must comply with the legislation governing environmental protection, occupational health, and safety in the country and/or the international agreements of Türkiye.

The method used to assess the ESG performance of the prioritized group may involve on-site visits to customers, business partners, or suppliers, as well as requesting information through digital channels, conducting analysis through data pools, or conducting on-site inspections. The relevant investee takes necessary measures to compensate or minimize environmental, social, or governance risks arising from investment and procurement transactions.

Water-related requirement
Complying with going beyond water-related regulatory requirements

% of suppliers with a substantive impact required to comply with this water-related requirement
100%

% of suppliers with a substantive impact in compliance with this water-related requirement
100%

Mechanisms for monitoring compliance with this water-related requirement
Certification
Fines and penalties
Off-site third-party audit
Supplier scorecard or rating

Response to supplier non-compliance with this water-related requirement
Retain and engage

Comment
We have developed a Responsible Investment Policy to guide capital allocation and investment decisions and ensure the sustainability of the value chain. Our group companies inform all their suppliers, prioritized business partners, and customers about this Policy. As stated in our policy, the investee companies, suppliers, and customers must comply with the legislation governing environmental protection, occupational health, and safety in the country and/or the international agreements of Türkiye.

The method used to assess the ESG performance of the prioritized group may involve on-site visits to customers, business partners, or suppliers, as well as requesting information through digital channels, conducting analysis through data pools, or conducting on-site inspections. The relevant investee takes necessary measures to compensate or minimize environmental, social, or governance risks arising from investment and procurement transactions.

W1.5d

(W1.5d) Provide details of any other water-related supplier engagement activity.

Type of engagement
Information collection

Details of engagement
Collect water management information at least annually from suppliers
Collect water quantity information at least annually from suppliers (e.g., withdrawal and discharge volumes)
Collect water quality information at least annually from suppliers (e.g., discharge quality, pollution incidents, hazardous substances)
Collect WASH information at least annually from suppliers

% of suppliers by number
100%

% of suppliers with a substantive impact
100%

Rationale for your engagement
As an example; one of Sabancı Holding's investee companies, i.e. CarrefourSA recognizes that its value chain's starting point, and therefore its most crucial aspect, is the supply chain. The company is aware that for its own sustainability, the supply chain must also be sustainable. To achieve this, CarrefourSA is dedicated to evaluating existing risks in the supply chain, monitoring its suppliers' social and environmental compliance, and promoting responsible practices throughout the value chain.

Water plays a vital role in both the direct and indirect activities of CarrefourSA, particularly in the supply of vegetable and fruit products. Additionally, water usage is involved in the production processes of their private-label products. As part of its sustainability efforts and risk assessment process, the company examines water-related issues in its private-label suppliers, monitoring their water usage volumes, water quality analysis reports, and water management practices on an annual basis.

Furthermore, CarrefourSA's commitment to human rights applies to all stakeholders, including the supply chain. However, the company holds itself to a higher responsibility, especially concerning its suppliers who produce goods under its own brand. As a result, the Company conducts social compliance studies and audits encompassing various aspects such as social management systems, legal rights and compliance, working conditions, prevention of forced and compulsory labor, anti-discrimination measures, worker inclusion in processes, improvement of health and safety practices, and environmental impact management. Within the scope of social compliance, CarrefourSA requests information from its suppliers annually to ensure that they provide their workers with full and secure WASH (Water, Sanitation, and Hygiene) services.

By monitoring water usage in the supply chain and fostering social and environmental compliance among its suppliers, CarrefourSA continues its efforts to achieve sustainability goals. In doing so, the company not only fulfills its own sustainability objectives but also takes on a leadership role in promoting sustainability throughout its supply chain.

CarrefourSA aims to extend these engagements to not only private-label suppliers but to all suppliers in the upcoming years.

Impact of the engagement and measures of success
i) Beneficial water-related outcomes of engagement activities:
By monitoring and evaluating water usage in the supply chain, CarrefourSA can identify areas of high consumption and work with suppliers to implement water-saving measures. This can help conserve water resources and reduce overall water consumption, contributing to sustainable water management.
In addition, engaging with suppliers allows CarrefourSA to assess the potential risks associated with water scarcity or water-related disruptions in the supply chain. By identifying vulnerable areas and collaborating with suppliers on risk mitigation strategies, the Company can minimize the impact of water-related risks on its operations.
Moreover, engaging with suppliers on water management fosters collaboration and knowledge sharing. Through these interactions, CarrefourSA can exchange best practices, innovative solutions, and leading to continuous improvement in water management across the supply chain.

ii) Metrics used to measure the success of supplier engagement: The complete sharing of water usage volumes, water quality analysis reports, water management systems, and WASH practices on an annual basis by all private-label suppliers of CarrefourSA, totaling 57 suppliers, and their progress in water usage improvements from year to year demonstrate the success of this engagement.

Comment
CarrefourSA, as one of our investees operating in the retail sector, is a significant example in terms of water dependencies and have direct information gathering, monitoring, and guidance interaction with its Tier-1 suppliers of private-label products. Therefore, in this question, the interaction details specific to CarrefourSA have been shared. As CarrefourSA engages with all suppliers having a substantial impact, the percentage of suppliers with a substantial impact is indicated as 100%.

W1.5e

(W1.5e) Provide details of any water-related engagement activity with customers or other value chain partners.

Type of stakeholder
Other, please specify (Entrepreneurs)

Type of engagement
Innovation & collaboration

Details of engagement
Collaborate with stakeholders on innovations to reduce water impacts in products and services

Rationale for your engagement
As Sabancı Group, we expect our companies to go beyond legal obligations and implement the best environmental solutions, support initiatives that contribute to the development and dissemination of environmentally friendly technologies, and promote environmental awareness. We strive to fulfill our social and environmental responsibilities towards society in all the geographies where we operate, in collaboration with our shareholders, employees, the public, civil society organizations, and other stakeholders.

We have established the Sabancı ARF program, through which we support entrepreneurs. The aim of this program is to foster open innovation and provide support, both in terms of mentorship and structural assistance, as well as seed funding, to entrepreneurs who are developing new ideas/technologies in the fields of energy, climate and water technologies, advanced materials technologies, digital technologies, and healthcare technologies. Over the course of a 20-week period, the provided budget is expected to help entrepreneurs succeed in their product/service development experiments, create a product/service prototype, and establish their first customer connection.

One of the ventures selected for this program and successfully completing its prototype is Blueit which is a hardware and software solution that builds a "Water Management System" that monitors and optimizes real-time water consumption in buildings.

Impact of the engagement and measures of success
The beneficial outcomes of the participation activity related to water are as follows:
One of the customers of this project that we support within the scope of ARF is Brisa, our group company operating in the automotive sector with high water usage. This system offers users a five-step process. The first step is measurement. Data from water meters within the facility is directly transmitted and processed in the cloud. In the second step, analysis, energy consumption and carbon emissions resulting from water usage are analyzed. A trend analysis of water, along with flow diagrams within the facility, is conducted. In case of anomalies, the user is promptly notified. The third step, reporting, allows for the calculation of carbon and water footprints in compliance with ISO standards. All this data and analysis are presented to the user through daily, weekly, monthly, and retrospective reports. The fourth step is planning. Artificial intelligence provides future water usage predictions and supports the creation of a water action plan. This enables the user to establish a water budget and usage plan. The final step is improvement. In this stage, the program assists in water usage reduction through effective water management and AI-driven savings recommendations.

Success Criterion:
This project is expected to have an accelerating effect on Brisa's goal of improving its water data tracking system and reducing water usage/increasing water efficiency through real-time monitoring.

W2. Business impacts

W2.1

(W2.1) Has your organization experienced any detrimental water-related impacts?
No

W2.2

(W2.2) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for water-related regulatory violations?

	Water-related regulatory violations	Fines, enforcement orders, and/or other penalties	Comment
Row 1	No	<Not Applicable>	N/A

W3. Procedures

W3.1

(W3.1) Does your organization identify and classify potential water pollutants associated with its activities that could have a detrimental impact on water ecosystems or human health?

	Identification and classification of potential water pollutants	How potential water pollutants are identified and classified	Please explain
Row 1	Yes, we identify and classify our potential water pollutants	Details of the policies, processes, and established standards followed by Sabancı Holding: Through our published Environmental Policy, Social Responsibility Policy, Responsible Investment Policy, and Capital Allocation Framework, we aim to ensure that our investee companies manage their activities in a socially, and environmentally responsible manner. We encourage them to go beyond legal obligations in their environmental practices, assess and reduce their environmental impacts, and develop initiatives to minimize harm. Additionally, we strive for a proactive approach in identifying and minimizing risks that could potentially harm the environment, by promptly and comprehensively implementing preventive measures. We consider the Water Pollution Control Regulation published by the ministry when defining water pollutants and their limit values. Furthermore, we prevent environmental and water source contamination by implementing segregation, storage, and disposal systems in compliance with the Waste Management Regulation. Description of the metrics: The parameters and limit levels of pollutants vary by industry due to their distinct polluting effects. However, according to the Water Pollution Control regulations, some fundamental metrics that include limit values are pH, temperature, oil and grease (mg/L), suspended particles (mg/L), surfactants (mg/L), and chemical oxygen demand (COD).	<Not Applicable>

W3.1a

(W3.1a) Describe how your organization minimizes the adverse impacts of potential water pollutants on water ecosystems or human health associated with your activities.

Water pollutant category
Other physical pollutants

Description of water pollutant and potential impacts
The most significant pollutants in the production processes of our investee companies operating in the industrials sector, specifically in cement and composite manufacturing, are solvent-based substances, oils, paint materials, and chemical additives that come into contact with water.

If these substances mix with water, they can have adverse effects on human health and the environment. The presence of certain chemicals within these substances carries the potential for toxicity, leading to acute or chronic health issues if ingested or exposed to the skin. The consumption of water contaminated by these pollutants can give rise to gastrointestinal problems, organ damage, and other adverse health conditions.

Additionally, the entry of these pollutants into water bodies can inflict detrimental impacts on aquatic ecosystems. Solvents, oils, and chemicals have the capacity to contaminate water, disrupting the equilibrium within the ecosystem. They can cause harm to aquatic organisms, including fish and other aquatic life, by impeding their reproductive capabilities, growth, and survival. This disruption can result in a decline in biodiversity and overall ecosystem health.

The pollution of water sources poses a threat to the availability of clean and safe water for communities. It can lead to water scarcity and a decline in water resource quality, affecting not only human consumption but also agricultural and industrial requirements.

Value chain stage
Direct operations

Actions and procedures to minimize adverse impacts
Assessment of critical infrastructure and storage condition (leakages, spillages, pipe erosion etc.) and their resilience
Beyond compliance with regulatory requirements
Reduction or phase out of hazardous substances

Please explain
ii) Procedures selected manage the risks of the potential impacts: Our Environmental Policy, Social Responsibility Policy, Responsible Investment Policy, and our Capital Allocation Framework requires compliance with environmental laws and other legal requirements, as well as the implementation of environmental practices beyond legal obligations. Our investee companies, particularly those operating in the manufacturing sector, conduct their operations in accordance with the ISO 14001 Environmental Management System. Within this standard, an effective Waste Management System is implemented in compliance with the Waste Management Regulation. This ensures the avoidance, minimization, or control of hazardous substances that could have adverse effects on environmental health and safety, and the proper disposal of hazardous waste in accordance with the best practice standards.

iii) How success is measured and evaluated: The absence of any environmental accidents and the avoidance of penalties related to environmental health and safety demonstrate the success of these processes and procedures.

W3.3

(W3.3) Does your organization undertake a water-related risk assessment?
Yes, water-related risks are assessed

W3.3a

(W3.3a) Select the options that best describe your procedures for identifying and assessing water-related risks.

Value chain stage
Direct operations
Supply chain
Other stages of the value chain

Coverage
Full

Risk assessment procedure
Water risks are assessed as part of an established enterprise risk management framework

Frequency of assessment
Annually

How far into the future are risks considered?
More than 6 years

Type of tools and methods used
Tools on the market
Enterprise risk management
International methodologies and standards
Databases
Other

Tools and methods used
WRI Aqueduct
COSO Enterprise Risk Management Framework
ISO 31000 Risk Management Standard
Environmental Impact Assessment
IPCC Climate Change Projections
Regional government databases
Internal company methods
External consultants
Materiality assessment

Contextual issues considered
Water availability at a basin/catchment level
Water quality at a basin/catchment level
Impact on human health
Water regulatory frameworks
Status of ecosystems and habitats
Access to fully-functioning, safely managed WASH services for all employees

Stakeholders considered
Customers
Employees
Investors
Local communities
Regulators
Suppliers

Comment
The assessment of risks vary across our investees given a wide range of sectors we are operating in and therefore the methods that we use for environmental risks may vary from one sector to another.

W3.3b

(W3.3b) Describe your organization's process for identifying, assessing, and responding to water-related risks within your direct operations and other stages of your value chain.

	Rationale for approach to risk assessment	Explanation of contextual issues considered	Explanation of stakeholders considered	Decision-making process for risk response
Row 1	Sabancı Holding and investees use the Enterprise Risk Management system, created according to the COSO Framework and ISO 31000 Risk Management Standard principles, which fully covers all operations of the investees. Risks are classified into four clusters: financial, strategic (including reputational and sustainability risks), operational, and compliance. Each cluster is evaluated based on parameters such as impact, likelihood, vulnerability, and speed of onset. The impact is assessed across various dimensions, including financial, operational, legal, reputational, health and safety, human resources, and environmental impacts. Risks are then classified based on their final scores: critical for a score equal to or higher than 3, high for a score between 2.6 and 3, medium for a score between 2 and 2.6, and low for a score equal to or lower than 2. External consultants are utilized in specific risk assessments to perform Environmental Impact Assessments for investee companies where relevant. The evaluation process follows the Materiality Assessment approach and includes a comprehensive assessment of water-related aspects in relevant activities. This assessment considers water dependencies, exposure to water-related risks and impacts on water resources. Local resources, such as regional government databases, are prioritized, and the utilization of future scenarios from the WRI Aqueduct Tool and IPCC Climate Change Projections is integral to the evaluation process.	Among our investee companies, 7 of them operating in the industrials, energy, retail, and building materials sectors highly depend on the availability and quality of water for the continuity of their operations. Any disruption in their production and, consequently, sales due to water-related risks can pose a financial risk to the Holding. Therefore, water availability and quality at the basin level are always taken into consideration during the risk assessment processes. In order to mitigate potential financial and reputational risks stemming from non-compliance with legal regulations, we monitor and ensure compliance with environmental laws, including water-related regulations, as well as other legal requirements. We believe that all our employees have the right to work in conditions that respect human dignity, in a healthy and safe environment. Any issue regarding access to fully functioning, safely managed WASH services for all employees can lead to employee dissatisfaction. Therefore, uninterrupted access to WASH services is consistently monitored. We are committed to identifying and implementing all necessary improvements throughout our value chain to minimize our environmental impacts while considering their effects on human health, the environment, and ecosystems. Since these risks that have the potential to harm human health and environmental sustainability can result in reputational and operational risks, we consider them during the risk assessment process.	Evaluating customer expectations and satisfaction assists in reducing the risk of customer loss and ensuring the sustainability of businesses. The health, safety, job satisfaction, and motivation of employees directly impact the success of the holding. Considering employees in the risk assessment process enables the implementation of measures to enhance employee satisfaction, and improve performance. Investors are significant stakeholders who impact the financial performance of the holding. Therefore, investor expectations are always assessed in the risk assessment process. As part of our corporate responsibility, we ensure that the activities of the Holding and Group companies do not negatively impact the local community in social and environmental aspects. In doing so, we eliminate reputational risks. Regulatory authorities are important stakeholders who establish and enforce legal requirements related to operations. Assessing regulatory requirements and compliance risks helps to reduce legal and regulatory risks and ensure regulatory compliance. In our Responsible Investment Policy implemented within the Group, it is mandatory for critical and prioritized suppliers to adhere to minimum ESG criteria and respect workers' rights in their operations. Additionally, suppliers are critical stakeholders in the production processes. Therefore, their sustainability performance, as well as continuity and quality performance, are considered.	The Holding Early Detection Risk Committee (EDRC) convenes at least six times a year to monitor risks based on their final risk scores and categories. Upon the recommendation of the EDRC, the Holding's Board of Directors decides on mitigation plans for risks categorized as high or critical. The Holding provides guidance to Group companies to enhance their preparedness and implement precautions within their business models to mitigate potential impacts. In general, risk supervisors or department heads are responsible for planning all mitigation actions, which are then assigned to a designated risk owner. Subsequently, the risk owner executes the action plan. The Holding's risk owner, risk supervisor, and risk management teams reassess the residual risk level once the mitigation actions have been completed. Additionally, the management of financial, strategic, operational, and compliance risks within investees are monitored and guided by the respective Group Presidents, Finance Group Presidency, and Legal, Risk, and Compliance Presidency of the Holding.

W4. Risks and opportunities

W4.1

(W4.1) Have you identified any inherent water-related risks with the potential to have a substantive financial or strategic impact on your business?

Yes, both in direct operations and the rest of our value chain

W4.1a

(W4.1a) How does your organization define substantive financial or strategic impact on your business?

According to the Enterprise Risk Management (ERM) system implemented by Sabancı Holding, risks are systematically classified based on their nature, falling into distinct clusters encompassing strategic, financial, operational, and compliance risks. Each cluster undergoes a comprehensive evaluation, incorporating crucial parameters such as 'impact,' 'likelihood,' 'vulnerability,' and 'speed of onset.'

The determination of the 'impact' factor entails a multifaceted assessment, considering various dimensions such as financial, operational, legal, reputational, health and safety, human resources, and environmental impact. To address these risks, the Holding's Early Detection of Risk Committee (EDRC) convenes a minimum of six times annually to deliberate upon the final risk scores and respective categories. Subsequently, based on the EDRC's recommendations, the Board of Directors (BoD) decides upon appropriate mitigation plans for risks categorized as high or critical.

In principle, all mitigation actions are devised by risk supervisors or department heads and subsequently entrusted to a designated risk owner. Consequently, the risk owner takes responsibility for implementing the action plan. Following the completion of mitigation actions, the Holding's related risk owner, risk supervisor, and risk management teams reevaluate the residual risk level.

For the year 2022, **the definition of 'substantive financial impact'** states that the threshold for the highest risk level is greater than TRY 300 million. Additionally, 'substantive strategic impact' is defined as the situation where a risk cluster is identified as 'strategic' and the risk is rated as either 'High' or 'Critical' based on inherent risks. Such risks are prioritized for reporting to the EDRC.

To categorize risks based on their final score calculated from impact, likelihood, vulnerability, and speed of onset, the following classification is used:
- A final score equal to or higher than 3 categorizes the risk as "Critical."
- A final score equal to 2.6 and between 2.6 and 3 classifies the risk as "High."
- A final score equal to 2 and between 2 and 2.6 assigns the risk as "Medium."
- A final score lower than 2 designates the risk as "Low."

All the key risk indicators under the pre-determined risk categories are shared with the EDRC in detail, even if no risk occurs.

Lastly, the financial impact scores for the year 2022 are as follows and are subject to annual revision:

1- No loss

2- Up to TRY150 million

3- TRY 150 million up to TRY 300 million

4- TRY 300 million up to TRY 530 million

5- More than TRY 530 million

This comprehensive risk management framework ensures effective risk identification, assessment, and mitigation strategies, contributing to the Holding's sustained resilience and success.

W4.1b

(W4.1b) What is the total number of facilities exposed to water risks with the potential to have a substantive financial or strategic impact on your business, and what proportion of your company-wide facilities does this represent?

	Total number of facilities exposed to water risk	% company-wide facilities this represents	Comment
Row 1	27	1-25	N/A

W4.1c

(W4.1c) By river basin, what is the number and proportion of facilities exposed to water risks that could have a substantive financial or strategic impact on your business, and what is the potential business impact associated with those facilities?

Country/Area & River basin

Turkey	Other, please specify (Black Sea, South Coast)

Number of facilities exposed to water risk
10

% company-wide facilities this represents
1-25

Production value for the metals & mining activities associated with these facilities
<Not Applicable>

% company's annual electricity generation that could be affected by these facilities
<Not Applicable>

% company's global oil & gas production volume that could be affected by these facilities
<Not Applicable>

% company's total global revenue that could be affected
51-60

Comment
Six of our investee companies operating in the building materials, energy, and industry sectors have high water usage. These companies operate in a total of 41 facilities, of which only 27 are located in regions evaluated with an extremely high and high level of water stress according to the WRI Aqueduct Tool. Out of these 27 facilities, 10 are located in the Black Sea and South Coast basin.

Country/Area & River basin

Turkey	Other, please specify (Mediterranean Sea, East Coast)

Number of facilities exposed to water risk
17

% company-wide facilities this represents
26-50

Production value for the metals & mining activities associated with these facilities
<Not Applicable>

% company's annual electricity generation that could be affected by these facilities
<Not Applicable>

% company's global oil & gas production volume that could be affected by these facilities
<Not Applicable>

% company's total global revenue that could be affected
41-50

Comment
Six of our investee companies operating in the building materials, energy, and industry sectors have high water usage. These companies operate in a total of 41 facilities, of which only 27 are located in regions evaluated with an extremely high and high level of water stress according to the WRI Aqueduct Tool. Out of these 27 facilities, 17 are located in the Mediterranean Sea, East Coast basin.

W4.2

(W4.2) Provide details of identified risks in your direct operations with the potential to have a substantive financial or strategic impact on your business, and your response to those risks.

Country/Area & River basin

Turkey	Other, please specify (Major Basins: Black Sea, South Coast and Mediterranean Sea, East Coast)

Type of risk & Primary risk driver

Reputation & markets	Other, please specify (Investor exit)

Primary potential impact
Reduction in capital availability

Company-specific description
The significance of Environmental, Social, Governance (ESG) is increasingly recognized by various stakeholders, especially investors, who acknowledge that environmental and social issues pose some of the most complex challenges of the last decades. Climate risks have emerged as a critical focus within the realm of ESG considerations. The potential for infrastructure and property losses due to climate change has already begun to impact the long-term financial sustainability of organizations. Additionally, the increasing occurrence of extreme rainfall, water stress, and water scarcity as a result of climate change poses disruptions to the production activities of numerous companies. Such circumstances can have adverse effects on a company's financial performance and profitability, leading to heightened operational costs and reduced

revenues. Consequently, this can negatively impact a company's stock value and market standing. Furthermore, companies that fail to address inadequate water management practices and disregard their environmental impacts may face heightened regulatory pressures and sanctions. Presently, investors who prioritize ESG factors pay substantial attention to water-related risks and a company's water management practices. Such investors exhibit a greater interest in companies that demonstrate water sensitivity and employ sustainable practices while veering away from investing in companies exposed to water-related risks.

The rise of ESG has transformed the perspective of major investors and the companies they invest in, shifting their focus to the risks inherent in conventional business models and the potential for long-term value generation through sustainable practices. Investor loss due to such reasons can impact the holding. As investors exit, the market value of the holding decreases, resulting in a decline in the value of shares held by existing investors, putting significant pressure on financial performance. The exit of investors can also have adverse implications for the holding's reputation, weakening its credibility in the public eye. Additionally, the departure of investors can influence the holding's growth strategies and constrain its future growth potential.

Timeframe
Current up to one year

Magnitude of potential impact
High

Likelihood
More likely than not

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

Potential financial impact figure (currency)
<Not Applicable>

Potential financial impact figure - minimum (currency)
10096000000

Potential financial impact figure - maximum (currency)
14740000000

Explanation of financial impact
The figures represent the amount of potential exit from Sabancı Holding shares (the exchange rates of the Central Bank of the Republic of Turkey as of end of July 2023). It is calculated based on an assumption on the geographic distribution of foreign investors and the level of their sensitivity on ESG issues given the legal frameworks and market developments in their specific region.

Risk assessment is being handled with 3 different scenario forecasts, to be able to cover all types of different possibilities and take precautions where possible. Each scenario is based on the estimations that are forecasting the portions of the investors that are located in the 3 of key locations for Sabancı Holding. For base scenario, certain amount of investors are forecasted to locate in 3 different locations in different portions. The other scenarios are half and 1/3 scenarios ; referring to the portions in the based scenario and calculated with dividing the portions to ½ and 1/3.

Calculating the risks, we have 2 possible scenarios. Minimum scenario is calculated based on the base scenario of investor distribution. In minimum scenario, total market cap is divided by the base scenario investor proportions to find the regional cap. Finding the amount of cap that is expected to be protected, is this value is subtracted from the regional investment to find the amount of potential loss in US dollars. Finally, this loss amount in US dollars is converted to local currency. Same method is repeated for maximum loss calculation, but only changing the scenario to 1/3.

The potential impact of investor loss risk with these approaches has been calculated, with a minimum effect of TRY 10,096,000,000 and a maximum effect of TRY 14,740,000,000.

These financial impacts are significantly higher than the substantive impact of 300 million TRY. Therefore, we consider the magnitude of this risk as high and take necessary actions to eliminate the probability of the risk occurring.

Primary response to risk
Introduce/strengthen water management incentives

Description of response
Sabancı Holding launched a Sustainability Roadmap which includes actions on managing water-related issues to be taken until the year 2050 and is implemented by our Group companies. Following this Roadmap, our community's strategy in response to climate and water risks is as follows:

- We assess the resilience of five strategically significant Group companies operating primarily in the industrials, building materials, and energy sectors, which have high water dependency, against water risks and evaluate the potential financial impacts of these risks annually through external consultants and scenario analyses

- As part of Sustainability Roadmap, the Responsible Investment Policy was introduced in 2022, aligning with the Roadmap. Under this policy, all investees are accountable for fulfilling their water-related responsibilities, including abstaining from operations in RAMSAR areas. Moreover, to ensure sustainable practices, all contracts with customers, suppliers, and business partners falling within the scope of priority value chain areas are bound by prohibited activities and minimum ESG standards

-We assess our water resource impact at an industry level and conduct studies focused on efficiency, recovery, and conservation to ensure responsible water management. Our investee companies have been actively involved in developing and implementing water management programs. For example, Brisa has emerged as a leading company with a strong commitment to reducing water consumption. Through the MBR membrane filter technology project, they have achieved a remarkable 95% recycling efficiency, effectively reusing the waste from the filtration system in the water cycle

-We have established the Sabancı ARF program, aiming to support entrepreneurs and promote open innovation in various technology sectors. One successful venture from this program is Blueit, which has developed a "Water Management System" to optimize water consumption in buildings. Brisa, one of our group companies with high water usage, is a customer of this project, and it is expected to help Brisa improve its water data tracking system and enhance water efficiency through real-time monitoring.

Our responsible business practices and efficiency-focused projects minimize water and environmental risks, building investor trust and supporting sustainable long-term growth. By doing so, we continue to progress in meeting investors' expectations and upholding our mission to be a reliable business partner.

Cost of response
130918780

Explanation of cost of response
1. A total of approx. 1 million euros was paid for consultancy services across the community in 2022, including risk assessments that also encompass preventive measures against risks. The figure is converted to TRY using an indicative exchange rate dated 1st of July, 2023 (28 TRY/EUR): EUR 1 Million x 28 TRY/USD = TRY 28 Million

2. Sabancı investee companies have invested TRY 102,918,780 in 2022 to increase their environmental performance.

Total cost of response= TRY 28,000,000 + TRY 102,918,780 = TRY 130,918,780

W4.2a

(W4.2a) Provide details of risks identified within your value chain (beyond direct operations) with the potential to have a substantive financial or strategic impact on your business, and your response to those risks.

Country/Area & River basin

Turkey	Other, please specify (Major Basin: Black Sea, South Coast)

Stage of value chain
Other, please specify (Portfolio)

Type of risk & Primary risk driver

Reputation & markets	Changes in consumer behavior

Primary potential impact
Reduction in capital availability

Company-specific description
One of our investee companies with high water dependency, which has the potential for strategic financial impact if affected by water risks, is Kordsa, in which we hold a 71% equity share. Water is a crucial resource in Kordsa's operations. The water used for yarn operations evaporates while it is discharged slowly. Additionally, during dipping procedures, greige fabrics are immersed in water-based chemical solutions. The discharged water adheres to local regulatory standards after undergoing treatment at the wastewater treatment plant. The community's environmental concerns are on the rise, prompting stakeholders, including investors, NGOs, and especially customers, to call for a reduction in Kordsa's water withdrawal volumes. Furthermore, Kordsa's major customers, global tire manufacturers, have set ambitious climate and water-related targets for 2030 and 2050, expecting the company's support in achieving these objectives.

While Kordsa actively manages and discloses its ESG performance and conducts research and development initiatives to enhance water performance in its products, customers are seeking further information on ongoing projects. Failing to meet market expectations in terms of responsible water management may hinder the company's ability to promote its products, particularly as global demand shifts towards more sustainable alternatives. A decline in orders from global customers may impact Kordsa's operational efficiency, potentially leading to higher unit costs and undermining its competitive position against other industry players. If Kordsa fails to take adequate measures in water management and cannot provide the demanded transparency and sustainable practices, the financial performance and reputation of the Holding may be affected, and customer and investor demands may increase.

Timeframe
More than 6 years

Magnitude of potential impact
High

Likelihood
Likely

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

Potential financial impact figure (currency)
<Not Applicable>

Potential financial impact figure - minimum (currency)
10096000000

Potential financial impact figure - maximum (currency)
14740000000

Explanation of financial impact
The figures represent the amount of potential exit from Sabancı Holding shares (the exchange rates of the Central Bank of the Republic of Turkey as of the end of July 2023). It is calculated based on an assumption of the geographic distribution of foreign investors and the level of their sensitivity to ESG issues given the legal frameworks and market developments in their specific region.

Risk assessment is being handled with 3 different scenario forecasts, to be able to cover all types of different possibilities and take precautions where possible. Each scenario is based on the estimations that are forecasting the portions of the investors that are located in the 3 key locations for Sabancı Holding. For the base scenario, a certain amount of investors are forecasted to locate in 3 different locations in different portions. The other scenarios are half and 1/3 scenarios; referring to the portions in the based scenario and calculated by dividing the portions to ½ and 1/3.

Calculating the risks, we have 2 possible scenarios. The minimum scenario is calculated based on the base scenario of investor distribution. In the minimum scenario, the total market cap is divided by the base scenario investor proportions to find the regional cap. Finding the amount of cap that is expected to be protected, this value is subtracted from the regional investment to find the amount of potential loss in US dollars. Finally, this loss amount in US dollars is converted to local currency. The same method is repeated for maximum loss calculation, but only changing the scenario to 1/3.

The potential impact of investor loss risk with these approaches has been calculated, with a minimum effect of TRY 10,096,000,000 and a maximum effect of TRY 14,740,000,000.

These financial impacts are significantly higher than the substantive impact of 300 million TRY. Therefore, we consider the magnitude of this risk as high and take necessary actions to eliminate the probability of the risk occurring.

Primary response to risk

Direct operations	Increase investment in new technology

Description of response

Sabancı Holding launched a Sustainability Roadmap which includes actions on managing water-related issues and is implemented by our investee companies. Following this Roadmap, we assess the resilience of five strategically significant Group companies operating primarily in the industrials, building materials, and energy sectors, which have high water dependency, against water risks and evaluate the potential financial impacts of these risks annually through external consultants and scenario analyses

Moreover, our investees have been actively involved in developing and implementing water management programs. In this case, Kordsa should conduct a review of water-related processes and perform optimization studies at necessary facilities. The Company has assembled engineering, environmental, and HSE teams for each location to analyze water usage and define various improvement actions to meet customer expectations. To maintain its reputation as a responsible brand and uphold its commitment to continually enhance water efficiency in operations, Kordsa allocates an annual budget for water-related capital investments

For Izmit Turkey facility the following projects have been scheduled for 2022 and 2023
- Completed in Q1 2022 Reduction of water consumption by 5% in the PET waste RO Unit
- Ongoing in 2022, expected completion in 2023: Implementation of a closed-loop water system instead of an open loop for the recovery of L2 Duct
- Finalized in April 2023 NY Biological treatment water recovery
- Implementation commenced in 2022, expected completion in 2023 NY Utility boiler blowdown water recovery

While the country is identified as Türkiye for this risk, it applies to all its facilities. Therefore, the following projects to increase water efficiency and decrease water impacts in its Thailand and Indonesia plants are recognized as actions to manage this risk

Indonesia Plant Projects
- Completed in Q4 2022 EDI Pre Treatment water to reduce the volume of blowdown water
- Implementation commenced in 2022, expected completion in 2023: Automation blowdown project to optimize water balance
- Feasibility studies completed in 2022, implementation started in 2023: Implementation of water recycling unit to treat and reuse discharged wastewater

Thailand Plant Projects
- Completed in 2022 Reduction of water used for gardening
- Completed in 2022 Reduction of drainage water from the cooling tower

The total amount of estimated water savings with these projects is 214.3 ML.

Cost of response

9736272

Explanation of cost of response

The total cost of the 9 projects implemented/planned by Kordsa is 374,472 USD. The figure is converted to TRY using an indicative exchange rate dated 1st of July, 2023 (26 TRY/USD): USD 374,472 x 26 TRY/USD = TRY 9,736,272.00

W4.3

(W4.3) Have you identified any water-related opportunities with the potential to have a substantive financial or strategic impact on your business?

Yes, we have identified opportunities, and some/all are being realized

W4.3a

(W4.3a) Provide details of opportunities currently being realized that could have a substantive financial or strategic impact on your business.

Type of opportunity
Efficiency

Primary water-related opportunity
Cost savings

Company-specific description & strategy to realize opportunity
Description of the opportunity:
Türkiye is located in a high-risk region concerning climate change-related risks. Risks such as water stress, water scarcity, and population growth affect the availability of water resources and also lead to negative impacts on water quality. Climate impact assessments conducted for this century indicate that increasing temperatures and changing precipitation patterns will result in a decrease in Türkiye's water potential compared to the reference period. The Ministry's published Water Efficiency Strategy Document and Action Plan state that stricter pricing policies will be implemented to encourage individuals and sectors to use water more efficiently.

Company-specific description: This situation will result in increased operational expenses, especially for our investees with high water usage. Thanks to the efficiency measures implemented across the group, we are using water resources more effectively and sustainably, making us a more environmentally responsible business. Additionally, reducing our operational expenses is positively impacting our business performance by increasing profitability.

In 2022, Brisa, one of our investees with high water usage and operating in the industrial sector, took various actions to realize the relevant opportunity for water conservation, aiming to achieve significant water savings in one year:

1. They received consultancy services for water reduction efforts, conducted feasibility studies, and identified the potential impacts of each action. The first phase of implementing the Blueit software for real-time water monitoring and intervention in abnormal situations was launched.

2. To prevent leaks and save water, isolation, and pipe replacement were carried out, targeting a water saving of 6,000.00 m3/year. They also improved treatment efficiency by adding additional UV, aiming for a water saving of 5,400.00 m3/year.

3. Brisa installed new RO, activated carbon, and sand filters to reuse wastewater, with an expected water saving of 120,000.00 m3/year. Additionally, they planned to redirect the output from the biological treatment to the new system, implement piping, and add more filters, targeting a water saving of 60,000.00 m3/year for wastewater reuse.

With these actions, a total of 191,400.00 m3/year water savings are expected to be achieved. Moreover, due to the rapidly increasing unit prices of water, it is anticipated that this amount will result in significant cost savings.

Estimated timeframe for realization
Current - up to 1 year

Magnitude of potential financial impact
Medium

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

Potential financial impact figure (currency)
2819322

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

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

Explanation of financial impact
Brisa, being a company with high water usage, uses a system to evaluate water pricing and calculate the rate of increase in unit prices in the regions where it operates. As a result of this internal pricing evaluation, it is expected that the average water unit price will be 14.73 TRY/m3 in Kocaeli in the year 2023. With the efficiency measures mentioned in the "Strategy to realize the opportunity," a total water saving of 191,400.00 m3/year is expected to be achieved. When considering this price, the total cost savings to be achieved with the relevant projects are as follows:

Total cost savings= 14.73 TRY/m3 * 191,400.00 m3/year = 2,819,322 TRY/year

Since this value falls within the threshold range specified in 4.1a as 'Up to TRY150 million,' we consider the magnitude of opportunity as medium.

W5. Facility-level water accounting

W5.1

(W5.1) For each facility referenced in W4.1c, provide coordinates, water accounting data, and a comparison with the previous reporting year.

Facility reference number
Facility 1

Facility name (optional)

Country/Area & River basin

Turkey	Other, please specify (Mediterranean Sea, East Coast)

Latitude

39.915258

Longitude
26.304118

Located in area with water stress
Yes

Primary power generation source for your electricity generation at this facility
<Not Applicable>

Oil & gas sector business division
<Not Applicable>

Total water withdrawals at this facility (megaliters/year)
1017.67

Comparison of total withdrawals with previous reporting year
About the same

Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes
33.4

Withdrawals from brackish surface water/seawater
0

Withdrawals from groundwater - renewable
0

Withdrawals from groundwater - non-renewable
808.4

Withdrawals from produced/entrained water
0

Withdrawals from third party sources
175.87

Total water discharges at this facility (megaliters/year)
85.77

Comparison of total discharges with previous reporting year
Much higher

Discharges to fresh surface water
55.57

Discharges to brackish surface water/seawater
0

Discharges to groundwater
0

Discharges to third party destinations
30.2

Total water consumption at this facility (megaliters/year)
931.9

Comparison of total consumption with previous reporting year
About the same

Please explain
We use the WRI Aqueduct Tool to assess the water stress risk of our operations. Six of our investee companies operating in the building materials, energy, and industry sectors have high water usage. These companies operate a total of 41 facilities in areas with high and extremely high water stress risk. In this line, the total water data, which includes all facilities of a company operating in the building materials sector among these six companies, has been calculated using the equity share approach. The latitude and longitude information has been provided for only one facility's location, which operates in the Mediterranean Sea, East Coast basin.

The total withdrawal volume of this company includes municipal water, surface water, groundwater, rainwater, and third-party water usage. The company discharges its wastewater only into fresh surface water and third-party facilities. The consumption volume has been calculated by subtracting the discharge volume from the withdrawal volume.

The comparison results have been made based on the following threshold range:
- If the difference is less than 10%: it is considered about the same.
- If the difference is between 10% and 20%: it is considered higher or lower.
- If the difference is greater than 20%: it is considered much higher or much lower.

Unused withdrawal sources and non-discharged destinations have been identified, and since there is no usage/discharge, they have been calculated as 0.

Facility reference number
Facility 2

Facility name (optional)

Country/Area & River basin

Turkey	Other, please specify (Mediterranean Sea, East Coast)

Latitude
36.877961

Longitude
34.787176

Located in area with water stress
Yes

Primary power generation source for your electricity generation at this facility
<Not Applicable>

Oil & gas sector business division
<Not Applicable>

Total water withdrawals at this facility (megaliters/year)
1842.68

Comparison of total withdrawals with previous reporting year
Higher

Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes
0

Withdrawals from brackish surface water/seawater
0

Withdrawals from groundwater - renewable
0

Withdrawals from groundwater - non-renewable
1817.81

Withdrawals from produced/entrained water
0

Withdrawals from third party sources
24.87

Total water discharges at this facility (megaliters/year)
12.7

Comparison of total discharges with previous reporting year
Much higher

Discharges to fresh surface water
0

Discharges to brackish surface water/seawater
0

Discharges to groundwater
0

Discharges to third party destinations
12.7

Total water consumption at this facility (megaliters/year)
1829.98

Comparison of total consumption with previous reporting year
Higher

Please explain
We use the WRI Aqueduct Tool to assess the water stress risk of our operations. Six of our investee companies operating in the building materials, energy, and industry sectors have high water usage. These companies operate a total of 41 facilities in areas with high and extremely high water stress risk. In this line, the total water data, which includes all facilities of a company operating in the building materials sector among these six companies, has been calculated using the equity share approach. The latitude and longitude information has been provided for only one facility's location, which operates in the Mediterranean Sea, East Coast basin.

The total withdrawal volume of this company includes municipal water, groundwater, and third-party water usage. The company discharges its wastewater only into third-party facilities which are the municipality's sewerage system. The consumption volume has been calculated by subtracting the discharge volume from the withdrawal volume.

The comparison results have been made based on the following threshold range:
- If the difference is less than 10%: it is considered about the same.
- If the difference is between 10% and 20%: it is considered higher or lower.
- If the difference is greater than 20%: it is considered much higher or much lower.

Unused withdrawal sources and non-discharged destinations have been identified, and since there is no usage/discharge, they have been calculated as 0.

Facility reference number
Facility 3

Facility name (optional)

Country/Area & River basin

Turkey	Other, please specify (Black Sea, South Coast)

Latitude
40.761206

Longitude
29.993052

Located in area with water stress
Yes

Primary power generation source for your electricity generation at this facility
<Not Applicable>

Oil & gas sector business division
<Not Applicable>

Total water withdrawals at this facility (megaliters/year)
217.38

Comparison of total withdrawals with previous reporting year
About the same

Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes
37.64

Withdrawals from brackish surface water/seawater
0

Withdrawals from groundwater - renewable
0

Withdrawals from groundwater - non-renewable
132.64

Withdrawals from produced/entrained water
0

Withdrawals from third party sources
47.1

Total water discharges at this facility (megaliters/year)
89.21

Comparison of total discharges with previous reporting year
Much higher

Discharges to fresh surface water
0

Discharges to brackish surface water/seawater
0

Discharges to groundwater
0

Discharges to third party destinations
89.21

Total water consumption at this facility (megaliters/year)
128.16

Comparison of total consumption with previous reporting year
Much higher

Please explain
We use the WRI Aqueduct Tool to assess the water stress risk of our operations. Six of our investee companies operating in the building materials, energy, and industry sectors have high water usage. These companies operate a total of 41 facilities in areas with high and extremely high water stress risk. In this line, the total water data, which includes all facilities of a company operating in the industrial sector among these six companies, has been calculated using the equity share approach. The latitude and longitude information has been provided for only one facility's location, which operates in the Black Sea, South Coast basin.

The total withdrawal volume of this company includes municipal water, rainwater, groundwater, and third-party water usage. The company discharges its wastewater only into third-party facilities which are the municipality's sewerage system. The consumption volume has been calculated by subtracting the discharge volume from the withdrawal volume.

The comparison results have been made based on the following threshold range:
- If the difference is less than 10%: it is considered about the same.
- If the difference is between 10% and 20%: it is considered higher or lower.
- If the difference is greater than 20%: it is considered much higher or much lower.

Unused withdrawal sources and non-discharged destinations have been identified, and since there is no usage/discharge, they have been calculated as 0.

Facility reference number
Facility 4

Facility name (optional)

Country/Area & River basin

Turkey	Other, please specify (Black Sea, South Coast)

Latitude
40.7635

Longitude
30.000642

Located in area with water stress
Yes

Primary power generation source for your electricity generation at this facility
<Not Applicable>

Oil & gas sector business division
<Not Applicable>

Total water withdrawals at this facility (megaliters/year)
513.21

Comparison of total withdrawals with previous reporting year
Higher

Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes
0

Withdrawals from brackish surface water/seawater
0

Withdrawals from groundwater - renewable
0

Withdrawals from groundwater - non-renewable
411.57

Withdrawals from produced/entrained water
0

Withdrawals from third party sources
101.63

Total water discharges at this facility (megaliters/year)
195.01

Comparison of total discharges with previous reporting year
About the same

Discharges to fresh surface water
0

Discharges to brackish surface water/seawater
0

Discharges to groundwater
0

Discharges to third party destinations
195.01

Total water consumption at this facility (megaliters/year)
318.2

Comparison of total consumption with previous reporting year
Much higher

Please explain
We use the WRI Aqueduct Tool to assess the water stress risk of our operations. Six of our investee companies operating in the building materials, energy, and industry sectors have high water usage. These companies operate a total of 41 facilities in areas with high and extremely high water stress risk. In this line, the total water data, which includes all facilities of a company operating in the industrial sector among these six companies, has been calculated using the equity share approach. The latitude and longitude information has been provided for only one facility's location, which operates in the Black Sea, South Coast basin.

The total withdrawal volume of this company includes municipal water and groundwater usage. The company discharges its wastewater only into third-party facilities which are the municipality's sewerage system. The consumption volume has been calculated by subtracting the discharge volume from the withdrawal volume.

The comparison results have been made based on the following threshold range:
- If the difference is less than 10%: it is considered about the same.
- If the difference is between 10% and 20%: it is considered higher or lower.
- If the difference is greater than 20%: it is considered much higher or much lower.

Unused withdrawal sources and non-discharged destinations have been identified, and since there is no usage/discharge, they have been calculated as 0.

Facility reference number
Facility 5

Facility name (optional)

Country/Area & River basin

Turkey	Other, please specify (Mediterranean Sea, East Coast)

Latitude
36.992459

Longitude
35.188022

Located in area with water stress
Yes

Primary power generation source for your electricity generation at this facility
<Not Applicable>

Oil & gas sector business division
<Not Applicable>

Total water withdrawals at this facility (megaliters/year)
30.64

Comparison of total withdrawals with previous reporting year
Higher

Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes
0

Withdrawals from brackish surface water/seawater
0

Withdrawals from groundwater - renewable
0

Withdrawals from groundwater - non-renewable
27.87

Withdrawals from produced/entrained water
0

Withdrawals from third party sources
2.77

Total water discharges at this facility (megaliters/year)
13.05

Comparison of total discharges with previous reporting year
Much higher

Discharges to fresh surface water
0

Discharges to brackish surface water/seawater
0

Discharges to groundwater
0

Discharges to third party destinations
13.05

Total water consumption at this facility (megaliters/year)
17.59

Comparison of total consumption with previous reporting year
About the same

Please explain
We use the WRI Aqueduct Tool to assess the water stress risk of our operations. Six of our investee companies operating in the building materials, energy, and industry sectors have high water usage. These companies operate a total of 41 facilities in areas with high and extremely high water stress risk. In this line, the total water data, which includes all facilities of a company operating in the industrial sector among these six companies, has been calculated using the equity share approach. The latitude and longitude information has been provided for only one facility's location, which operates in the Mediterranean Sea, East Coast basin.

The total withdrawal volume of this company includes municipal water and groundwater usage. The company discharges its wastewater only into third-party facilities which are the municipality's sewerage system. The consumption volume has been calculated by subtracting the discharge volume from the withdrawal volume.

The comparison results have been made based on the following threshold range:
- If the difference is less than 10%: it is considered about the same.
- If the difference is between 10% and 20%: it is considered higher or lower.
- If the difference is greater than 20%: it is considered much higher or much lower.

Unused withdrawal sources and non-discharged destinations have been identified, and since there is no usage/discharge, they have been calculated as 0.

Facility reference number
Facility 6

Facility name (optional)

Country/Area & River basin

Turkey	Other, please specify (Mediterranean Sea, East Coast)

Latitude
38.121656

Longitude
37.048077

Located in area with water stress
Yes

Primary power generation source for your electricity generation at this facility
<Not Applicable>

Oil & gas sector business division
<Not Applicable>

Total water withdrawals at this facility (megaliters/year)
1120.82

Comparison of total withdrawals with previous reporting year
Much lower

Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes
142.2

Withdrawals from brackish surface water/seawater
0

Withdrawals from groundwater - renewable
0

Withdrawals from groundwater - non-renewable
975.66

Withdrawals from produced/entrained water
0

Withdrawals from third party sources
2.97

Total water discharges at this facility (megaliters/year)
57

Comparison of total discharges with previous reporting year
About the same

Discharges to fresh surface water
0

Discharges to brackish surface water/seawater
0

Discharges to groundwater
0

Discharges to third party destinations
57

Total water consumption at this facility (megaliters/year)
1063.82

Comparison of total consumption with previous reporting year
Much lower

Please explain
We use the WRI Aqueduct Tool to assess the water stress risk of our operations. Six of our investee companies operating in the building materials, energy, and industry sectors have high water usage. These companies operate a total of 41 facilities in areas with high and extremely high water stress risk. In this line, the total water data, which includes all facilities of a company operating in the industrial sector among these six companies, has been calculated using the equity share approach. The latitude and longitude information has been provided for only one facility's location, which operates in the Mediterranean Sea, East Coast basin.

The total withdrawal volume of this company includes municipal water, fresh surface water, and groundwater usage. The company discharges its wastewater only into third-party facilities which are the municipality's sewerage system. The consumption volume has been calculated by subtracting the discharge volume from the withdrawal volume.

The comparison results have been made based on the following threshold range:
- If the difference is less than 10%: it is considered about the same.
- If the difference is between 10% and 20%: it is considered higher or lower.
- If the difference is greater than 20%: it is considered much higher or much lower.

Unused withdrawal sources and non-discharged destinations have been identified, and since there is no usage/discharge, they have been calculated as 0.

W5.1a

(W5.1a) For the facilities referenced in W5.1, what proportion of water accounting data has been third party verified?

Water withdrawals – total volumes

% verified
76-100

Verification standard used
ISAE 3000

Please explain
<Not Applicable>

Water withdrawals – volume by source

% verified
76-100

Verification standard used
ISAE 3000

Please explain
<Not Applicable>

Water withdrawals – quality by standard water quality parameters

% verified
76-100

Verification standard used
The water supplied to the network by municipalities must be controlled according to specific quality standards. Additionally, we obtain our drinking water from suppliers who have their water analyzed by accredited institutions. Moreover, some of our manufacturing companies analyze the water they draw for their production processes.

Please explain
<Not Applicable>

Water discharges – total volumes

% verified
76-100

Verification standard used
ISAE 3000

Please explain
<Not Applicable>

Water discharges – volume by destination

% verified
76-100

Verification standard used
ISAE 3000

Please explain
<Not Applicable>

Water discharges – volume by final treatment level

% verified
76-100

Verification standard used
ISAE 3000

Please explain
<Not Applicable>

Water discharges – quality by standard water quality parameters

% verified
76-100

Verification standard used
Samples are taken from wastewater, analyzed in accredited laboratories, and verified by the local authorities.

Please explain
<Not Applicable>

Water consumption – total volume

% verified
76-100

Verification standard used
ISAE 3000

Please explain
<Not Applicable>

W6. Governance

W6.1

(W6.1) Does your organization have a water policy?

Yes, we have a documented water policy that is publicly available

W6.1a

(W6.1a) Select the options that best describe the scope and content of your water policy.

	Scope	Content	Please explain
Row 1	Company-wide	Description of the scope (including value chain stages) covered by the policy Description of business dependency on water Description of business impact on water Commitment to align with international frameworks, standards, and widely-recognized water initiatives Commitment to prevent, minimize, and control pollution Commitment to reduce or phase-out hazardous substances Commitment to reduce water withdrawal and/or consumption volumes in direct operations Commitment to reduce water withdrawal and/or consumption volumes in supply chain Commitment to water stewardship and/or collective action Commitment to the conservation of freshwater ecosystems Commitments beyond regulatory compliance Reference to company water-related targets Acknowledgement of the human right to water and sanitation	As Sabancı Holding, the corporate Environmental Policy and Responsible Investment Policy we have released are applicable both within our own operations and the operations of our investees. Through these policies, we aim to uphold the principles of environmental sustainability and social responsibility, focusing on effective utilization of natural resources, enhancing energy and water efficiency, improving waste management, reducing emissions, and preserving ecosystems. On top of these umbrella policies, our investee companies have tailored policies on water and environment, which have in-depth provisions on such issues. The selection of topics are based on the above-mentioned policies. In line with these policies: - We define our impact on water resources on an industry basis and carry out studies for efficiency, recovery, and savings to manage water sustainability. - We identify and manage environmental risks, as water usage directly impacts the operations of our investees. -As well as prioritizing compliance with environmental laws and other legal requirements, we establish our environmental standards beyond regulatory obligations and embrace best practices. -We assess all our environmental impacts and the effects on resources, develop target-oriented programs, establish monitoring systems, conduct reviews, and implement improvement measures. -Through our investment and venture capital programs, we actively collaborate with our stakeholders to develop and promote best practices in environmental sustainability. -We adopt the Sustainable Development Goals in our operations. We pay close attention to the universal accessibility and availability of the human right to water and sanitation, ensuring their implementation in all our operations. Similarly, we take responsibility for the preservation and sustainability of freshwater ecosystems and particularly refrain from engaging in activities that threaten RAMSAR areas or their integrity. -Some of our group companies' objectives are removing hazardous compounds from wastewater streams and considering water-related requirements in product and supplier selection.

W6.2

(W6.2) Is there board level oversight of water-related issues within your organization?

Yes

W6.2a

(W6.2a) Identify the position(s) (do not include any names) of the individual(s) on the board with responsibility for water-related issues.

Position of individual or committee	Responsibilities for water-related issues
Board-level committee	In 2021, a Sustainability Board Committee was established, which is formed and governed by independent Board Members of Sabancı Holding. The Committee held its first meeting following its establishment in 2021. Sustainability Board Committee comprises independent board members in order to help the Board of Directors fulfill its duties and responsibilities regarding environmental and social issues in a healthy manner. Sustainability Board Committee comprises a Rapporteur and maximum of three members including the Chair who is appointed by the Sabancı Holding Board of Directors. The Chair of the Committee is selected among the independent Board Members and appointed by the Sabancı Holding Board of Directors. The Committee meets in ordinary sessions at least twice a year. The meeting minutes are submitted to the Sabancı Holding Board of Directors. The Committee discuss issues related to the Sustainability Governance Structure of the Holding and Local and global developments related the climate change and water issues such as IPCC Reports, and EU directives on the environment. Example of water-related decision made by the committee: Our Sustainability Roadmap includes the encouragement of our investees on disclosing their water and climate-related data through CDP. In accordance with the Roadmap, the Responsible Investment Policy was established on April 14, 2022, as part of our target of being net zero by 2050. All investees are responsible for carrying out their water-related responsibilities under this policy, such as refraining from working in RAMSAR areas. Furthermore, prohibited activities and minimum ESG standards are taken under commitment in all contracts to be made with customers, suppliers, and business partners that fall within the scope of value chain areas prioritized by Group companies. The Roadmap and the policy are approved by the Sustainability Board Committee. https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL-Policy-ENG.pdf

W6.2b

(W6.2b) Provide further details on the board's oversight of water-related issues.

	Frequency that water-related issues are a scheduled agenda item	Governance mechanisms into which water-related issues are integrated	Please explain
Row 1	Scheduled - some meetings	Monitoring implementation and performance Monitoring progress towards corporate targets Overseeing acquisitions, mergers, and divestitures Overseeing and guiding public policy engagement Overseeing major capital expenditures Overseeing the setting of corporate targets Providing employee incentives Reviewing and guiding annual budgets Reviewing and guiding business plans Reviewing and guiding corporate responsibility strategy Reviewing and guiding major plans of action Reviewing and guiding risk management policies Reviewing and guiding strategy Reviewing innovation/R&D priorities Setting performance objectives	We established a Sustainability Leadership Committee (SLC) which includes all of our Group Presidents to assure the durability of our ESG management. The SLC is responsible for the progress toward the targets and actions included in the Group's Sustainability Roadmap, monitoring the efforts to manage risks and opportunities affecting Sabancı's reputation and operations in ESG areas. In meetings of the SLC, environmental and water issues are discussed within the scope of the sustainability approach. For instance, a presentation is made to the committee regarding the determination of targets and the current progress in the targets, especially for those investees which are operating in water-intensive sectors. In addition, a Sustainability Committee at the level of the Board of Directors was established, consisting of Independent Board Members of Sabancı Holding. At the investee company level, we ensure alignment and coordination across all our businesses through Thematic Task Forces within the Leadership Committee as supporting structures for the focus areas in the Sustainability Roadmap. Consisting of experts from Group companies, the Task Forces operate with agile working logic. It is responsible for making plans and project designs for the implementation of items detailed in the action plan. It reports its work to the Sustainability Leadership Committee through the Sustainability Business Unit. Climate emergency and water issues are a major aspect of Sabancı Holding's sustainability initiatives, given the Group's long-term objective of reaching net zero emissions and zero waste by 2050. Such topics are brought to the agenda of BoD members through a variety of channels including the Board-level Sustainability Committee. Moreover, risk study results related to climate change are evaluated periodically by the Holding BoD, Early Detection Risk Committee and Risk Coordination Committee. Sustainability risks, including those that are related to climate and water, are among the critical risks that are assessed and monitored at the EDRC level. The CEO oversees the sustainability practices of the Holding through this mechanism. The outcomes are reported to the Board. In 2022, the Board monitored the Group companies' strategy and progress for nature strategy and determine the related KPIs for Business Units.

W6.2d

(W6.2d) Does your organization have at least one board member with competence on water-related issues?

	Board member(s) have competence on water-related issues	Criteria used to assess competence of board member(s) on water-related issues	Primary reason for no board-level competence on water-related issues	Explain why your organization does not have at least one board member with competence on water-related issues and any plans to address board-level competence in the future
Row 1	Yes	We believe that having members on the Board of Directors who possess a diverse range of competencies, knowledge and experience strengthens the Board's functioning and benefits decision-making processes. Research shows that companies with a diverse board of directors have 36% more profitability than others. The process of being nominated for the Board of Directors membership is not solely limited to gender equality in terms of diversity and inclusion. We evaluate the competencies of candidates by considering various factors, such as knowledge of the industry, management experience, knowledge in ESG matters, crisis management experience, and global and long-term thinking. 89% of our Board Members have ESG experience. The Skills Matrix can be seen in our 2021 Sustainability Report's Governance section. Members of our Board of Directors are active members of several nature-related foundations, associations, and initiatives.	<Not Applicable>	<Not Applicable>

W6.3

(W6.3) Provide the highest management-level position(s) or committee(s) with responsibility for water-related issues (do not include the names of individuals).

Name of the position(s) and/or committee(s)

Chief Executive Officer (CEO)

Water-related responsibilities of this position

Assessing water-related risks and opportunities
Managing water-related risks and opportunities
Conducting water-related scenario analysis
Setting water-related corporate targets
Monitoring progress against water-related corporate targets
Managing public policy engagement that may impact water security
Managing value chain engagement on water-related issues
Integrating water-related issues into business strategy
Managing annual budgets relating to water security
Managing major capital and/or operational expenditures related to low water impact products or services (including R&D)
Managing water-related acquisitions, mergers, and divestitures
Providing water-related employee incentives

Frequency of reporting to the board on water-related issues

Quarterly

Please explain

The CEO of the Holding holds the ultimate responsibility for monitoring and assessment of sustainability-related risks and opportunities, including those that are related to climate emergencies, as well as the execution of the Sust. Roadmap. Among CEO's water-related responsibilities are overseeing the following on a high level;
-Assessment & mngmnt of risks&opp.
-Setting targets and monitoring progress
-Managing public policy and value chain engagement
-Integrating water-related issues into the strategy
-Managing annual budgets
-Managing major capital and operational expenditures related to low-water impact products or services
-Managing water-related acquisitions, mergers, and divestitures
-Providing water-related employee incentives

The Sustainability Leadership Committee reports to the CEO. The CEO takes part in the Committee's meetings when necessary. The Committee has scheduled meetings at least three times and one more whenever necessary. The outcomes are shared with the BoD.

W6.4

(W6.4) Do you provide incentives to C-suite employees or board members for the management of water-related issues?

	Provide incentives for management of water-related issues	Comment
Row 1	Yes	N/A

W6.4a

(W6.4a) What incentives are provided to C-suite employees or board members for the management of water-related issues (do not include the names of individuals)?

	Role(s) entitled to incentive	Performance indicator	Contribution of incentives to the achievement of your organization's water commitments	Please explain
Monetary reward	Corporate executive team Chief Executive Officer (CEO) Chief Sustainability Officer (CSO)	Improvements in water efficiency – direct operations Company performance against a sustainability index with water-related factors (e.g., DJSI, CDP Water Security score, etc.) Other, please specify ((Implementation of Sustainability Roadmap which includes water-related actions and targets; Increase in ESG ratings which also include water-related issues, increasing transparency on Climate & Water related issues))	As stated in our corporate environmental policy, we embrace a preventive approach in all our activities to continuously improve our environmental performance. We identify all our environmental impacts, develop targets, programs, and monitoring systems, review them, and take measures for improvement purposes. As part of our Sustainability Roadmap, we aim to transform our existing investments in key sectors such as energy, industry, and financial services into more sustainable investments. In order to contribute to Sabancı Group's sustainability transformation, new generation growth areas have been identified within the scope of advanced technology-focused business. Energy, climate technologies, material technologies incl. water-related, and digital technologies, which are fundamental elements of the "new economy," hold great importance in the Group's growth strategy. By focusing on these key areas, Sabancı Group aims to make the highest possible contribution to the transition towards a more sustainable economy. Sabancı Holding, aiming to continuously improve its ESG practices, also aims to enhance its performance in the most prestigious sustainability ratings and indices such as CDP, Refinitiv, etc. Linking performance targets to climate and water-related initiatives fosters a stronger commitment to sustainability throughout the organization, resulting in more effective implementation of environmental programs and continued progress towards environmental goals.	ESG performance, including but not limited to those that are related to climate and water issues, are embedded in executive management's performance goals including the Holding CEO, Holding Group Presidents, and Group company CEOs. Sustainability KPIs make up 10%-20% of C-Level executives' bonus schemes including the CEOs and Group Presidents, who are also members of the Group company BoDs. Within this rate, they receive a premium according to the target progress. The CEOs of Group companies and Holding Group Presidents are also responsible of the management of the Sustainability Roadmap of Sabancı Group and this is a part of their performance targets. Sabancı Holding determines KPIs for its executives and employees in order to incentivize achieving its climate and water-related business goals. The realization of the performance targets by the C-level and Group companies ensures the continuity of progress and success in implementing sustainability programs. In summary, continued progress on climate is supported by monetary rewards to the employees.
Non-monetary reward	Corporate executive team Chief Executive Officer (CEO) Chief Sustainability Officer (CSO) Other, please specify (Investee companies' employees)	Reduction in water consumption volumes – direct operations Increased investment in water-related R&D Company performance against a sustainability index with water-related factors (e.g., DJSI, CDP Water Security score, etc.) Other, please specify (Implementation of Sustainability Roadmap which includes water-related actions and targets; Increase in ESG ratings which also include water-related issues, increasing transparency on Climate & Water related issues)	As stated in our corporate environmental policy, we embrace a preventive approach in all our activities to continuously improve our environmental performance. We identify all our environmental impacts, develop targets, programs, and monitoring systems, review them, and take measures for improvement purposes. As part of our Sustainability Roadmap, we aim to transform our existing investments in key sectors such as energy, industry, and financial services into more sustainable investments. In order to contribute to Sabancı Group's sustainability transformation, new generation growth areas have been identified within the scope of advanced technology-focused business. Energy, climate and water technologies, material technologies, and digital technologies, which are fundamental elements of the "new economy," hold great importance in the Group's growth strategy. By focusing on these key areas, Sabancı Group aims to make the highest possible contribution to the transition towards a more sustainable economy. Sabancı Holding, aiming to continuously improve its ESG practices, also aims to enhance its performance in the most prestigious sustainability ratings and indices such as CDP, Refinitiv, etc. Linking performance targets to climate and water-related initiatives fosters a stronger commitment to sustainability throughout the organization, resulting in more effective implementation of environmental programs and continued progress towards environmental goals.	ESG performance, including but not limited to those that are related to climate issues, are embedded in executive management's performance goals including the Holding CEO, Holding Group Presidents, and Group company CEOs. Sustainability KPIs make up 10%-20% of C-Level executives' bonus schemes including the CEOs and Group Presidents, who are also members of the Group company BoDs. Within this rate, they receive a premium according to the target progress. The CEOs of Group companies and Holding Group Presidents are also responsible of the management of the Sustainability Roadmap of Sabancı Group and this is a part of their performance targets. Sabancı Holding determines KPIs for its executives and employees in order to incentivize achieving its climate and water-related business goals. The realization of the performance targets by the C-level and Group companies ensures the continuity of progress and success in implementing sustainability programs. Sabancı Holding also holds Golden Collar award program to encourage and recognize good practices and innovation majority of which are directly related to Sabancı Holding's ESG goals including water. In summary, continued progress on climate is supported by monetary & non-monetary rewards to the employees.

W6.5

(W6.5) Do you engage in activities that could either directly or indirectly influence public policy on water through any of the following?

Yes, direct engagement with policy makers

Yes, trade associations

Yes, other

W6.5a

(W6.5a) What processes do you have in place to ensure that all of your direct and indirect activities seeking to influence policy are consistent with your water policy/water commitments?

i) A description of the process used to ensure consistency: Sabancı Holding takes an active role in national and international business-led sustainability platforms such as WBCSD, BSCD Turkey and the environmental working groups of TUSIAD (The Turkish Industry and Business Association). The Holding makes sure that the outcome of the working group studies and white papers issued in these platforms are in line with its own strategy through its active participation and engagement with those organizations. This is achieved via the Holding's strong representation in the BoD or the working groups, some of which are chaired by the Holding's senior management. The potential inconsistencies between the strategy of the Holding and such platforms are mostly prevented before they occur, through an assessment process prior to the approval of the Holding's membership.

ii) An explanation of the action taken if an inconsistency is discovered: In case the Holding detects any action against the policies, it informs customers, business partners or suppliers who violate the policies, giving an additional 12-month period to take action if technically possible. If the inconsistency is not resolved within this time frame, the relations are re-evaluated, and the business partnership is terminated when necessary, taking into account the severity of the occurrence. The final decision on ending the business relations is made by the related business units' top managers or Group Company CEOs.

W6.6

(W6.6) Did your organization include information about its response to water-related risks in its most recent mainstream financial report?

Yes (you may attach the report - this is optional)

2022-annual-report.pdf

W7. Business strategy

W7.1

(W7.1) Are water-related issues integrated into any aspects of your long-term strategic business plan, and if so how?

	Are water-related issues integrated?	Long-term time horizon (years)	Please explain
Long-term business objectives	Yes, water-related issues are integrated	21-30	At Sabancı Holding, we see water as a fundamental natural capital for all sectors in which we operate. We are aware that disruption in water supply due to factors such as drought and water-related extreme events like floods will adversely affect all business processes in our value chain. Accordingly, we define our impact on water resources on an industry basis and our Group companies carry out studies focused on efficiency, recovery, and savings to manage water in a sustainable manner. This vision is reflected in our long-term sustainability goals covering a period of 30 years as the Group to become net zero emissions and zero waste by 2050 at the latest and to increase continuously circular economy practices. We also have water-related actions including the better identification of water-related risks and increasing the disclosure on water issues in our Sustainability Roadmap, which applies to 100% of our Group companies. Finally, we have committed to invest USD 5 bn of Capex & Opex in SDG-related businesses from 2022-2027 including water related areas, which will potentially be renewed in every 5 years strategic plan moving forward. Our efforts to help tackle climate emergency as well as to manage our waste including wastewater and to increase circular economy practices will result in efficient management of water resources.
Strategy for achieving long-term objectives	Yes, water-related issues are integrated	21-30	As part of our commitment to sustainable practices, we have established a comprehensive strategy to address water-related risks and opportunities within our subsidiary companies. Out of our 13 subsidiaries, eight operate in sectors such as industrials, energy, building materials, and retail, where water plays a critical role in ensuring the continuity of their operations. The availability and quality of water are vital for their production processes and, consequently, for sustaining their sales and revenue streams. Recognizing the potential financial risks associated with any disruptions in production and sales due to water-related issues, we have prioritized water management as a key aspect of our long-term goals. Our long-term strategy covering a period of 30 years involves enhancing sustainability governance across all levels of the organization, fostering a proactive approach to identifying and addressing water-related risks and opportunities. We aim to increase the adoption of products and services that have a positive impact on sustainability, with also a focus on water conservation and responsible water usage. By promoting circular economy practices, we seek to minimize our water footprint and maximize resource efficiency throughout the product lifecycle. Finally, we have committed to invest USD 5 bn of Capex& Opex in SDG-related businesses from 2022-2027 including water related areas, which will potentially be renewed in every 5 years strategic plan moving forward.
Financial planning	Yes, water-related issues are integrated	21-30	Holding level: One of the key drivers of the Holding's capital allocation decisions is sustainability. We unite Turkey and the World for a sustainable life with leading enterprises, sustainability will continue to drive our investment decisions in the long run. Group-wide: On the other hand our investee companies, i.e. Group companies, develop sustainable products, services, and business models, commit to TL 200 billion in sustainable financing by 2030 and a sustainable mutual fund balance of TL 15 billion by 2030. We also have water-related actions including the better identification and management of water-related risks and increasing the disclosure of water issues in our Sustainability Roadmap, which applies to 100% of our Group companies. The Roadmap influences the financial planning of the Group in terms of operational and capital expenditures. Sabancı Holding has a planned budget of USD 5 billion for SDG-related Capex & Opex investments, the majority of which are directly related to climate and water-related areas, between 2022 and 2027. In 2022, 98% SDG related CAPEX & OPEX investments are climate and water-related. By the end of 2027, at least 70% of this investment amount will be allocated to climate mitigation and adaptation and associated investments like water.

W7.2

(W7.2) What is the trend in your organization's water-related capital expenditure (CAPEX) and operating expenditure (OPEX) for the reporting year, and the anticipated trend for the next reporting year?

Row 1

Water-related CAPEX (+/- % change)
254

Anticipated forward trend for CAPEX (+/- % change)
50

Water-related OPEX (+/- % change)
200

Anticipated forward trend for OPEX (+/- % change)
80

Please explain
The Holding's OPEX comprises municipal water expenses. There has been a 201% increase in OPEX due to rising unit prices. Additionally, the Holding's investees' environmental expenditures, majority of which are OPEX, have also increased by 200% compared to last year. These expenditures are related to environmental enhancements to comply with legislation and even beyond. We anticipate at least an 80% increase in these expenses for the next year, driven by increase in overall costs due to factors such as inflation and increased environmental enhancements.

The water-related CAPEX costs include various expenses related to mitigation investments in 2022 of investee companies. Such investments lead to efficiencies including water savings. In 2022, there was a 254% increase in overall costs and increased environmental investments. We aim to continue making environmental investments leading to an anticipated min. of 50% increase in projected CAPEX expenditures.

W7.3

(W7.3) Does your organization use scenario analysis to inform its business strategy?

	Use of scenario analysis	Comment
Row 1	Yes	N/A

W7.3a

(W7.3a) Provide details of the scenario analysis, what water-related outcomes were identified, and how they have influenced your organization's business strategy.

	Type of scenario analysis used	Parameters, assumptions, analytical choices	Description of possible water-related outcomes	Influence on business strategy

	Type of scenario analysis used	Parameters, assumptions, analytical choices	Description of possible water-related outcomes	Influence on business strategy
Row 1	Water-related Climate-related	It is essential to carry out scenario and impact analysis to inform our investment decisions. Water and climate-related scenario analysis guide us in our strategic planning in terms of protecting and growing our existing businesses and investing in new growth platforms. It also guides our investee companies' product development/diversification processes. The analysis is conducted for medium to long time horizons, to be able to grasp the possible physical impacts of climate change on the operations. Climate-related Scenarios: The Sabancı Group has conducted climate risk assessments using different scenarios for various sectors. Under the "Stabilization" scenario, radiative forcing is stabilized before 2100 through the use of technologies and strategies to reduce greenhouse gas emissions. Building materials, industrials, and retail sectors assessed their facilities under the RCP 4.5 scenario for physical climate risks assessment. In the "Pessimistic" scenario, radiative forcing continues to grow beyond 2100 due to insufficient adaptation of technologies and strategies for GHG reduction. Facilities from building materials and industrial sectors were assessed under the RCP 8.5 scenario for physical climate risks assessment. One of the Group's companies, Brisa, used the RCP 6.0 scenario, which is one of the worst-case scenarios with high greenhouse gas emissions. Under this scenario, radiative forcing is stabilized after 2100 through the use of technologies and strategies to reduce emissions. The RCP 6.0 scenario projects continuous global warming, with CO2 levels rising to 670 ppm by 2100, leading to an estimated global temperature rise of about 3–4 °C by 2100. Water-related Scenarios: We utilize the WRI Aqueduct Tool for conducting future water-scenario analysis for the years 2030 and 2040. In this tool, we assess the water stress and water scarcity risks in the regions where Sabancı Group operates, based on pessimistic, business-as-usual, and optimistic scenarios. These scenarios take into account factors such as population growth, land use changes, and the impacts of climate change. Utilizing the WRI Aqueduct Tool in our analysis for these specific time frames allows us to obtain a comprehensive understanding of the potential difficulties we could encounter regarding water resources.	The results obtained from climate and water scenarios indicate that temperature increases will cause critical stress on water resources. According to the WRI Aqueduct Tool, among the investee companies, six operate in the building materials, energy, and industry sectors and have high water usage. These companies run a total of 41 facilities, with 27 of them situated in regions assessed with extremely high and high water stress levels. Any water-related issues can impact the production and sales of these companies, potentially reducing their revenue and profitability. Such financially challenging situations can negatively affect the Holding's profitability and overall financial performance. Companies that neglect to address inadequate water management practices and ignore their environmental impacts may encounter increased regulatory scrutiny and penalties. Currently, investors who prioritize ESG factors are placing significant emphasis on climate and water-related risks and a company's approach to water management. These investors show a heightened interest in companies that exhibit water sensitivity and adopt sustainable practices while avoiding investments in companies exposed to water-related risks.	Sabancı Holding launched a Sustainability Roadmap which includes actions on managing water-related issues and is implemented by our Group companies. Following this Roadmap, our community's mitigation and adaptation strategy in response to climate and water risks is as follows: - Responsible Investment Policy was introduced in 2022, aligning with the Roadmap. Under this policy, all investees are accountable for fulfilling their water-related responsibilities, including abstaining from operations in RAMSAR areas. Moreover, to ensure sustainable practices, all contracts with customers, suppliers, and business partners falling within the scope of priority value chain areas are bound by prohibited activities and minimum ESG standards. -We assess our water resource impact at an industry level and conduct studies focused on efficiency, recovery, and conservation to ensure responsible water management. Our investee companies have been actively involved in developing and implementing water management programs. -We have established the Sabancı ARF and Ventures program, to gain early access to technological innovations and developments, as well as to create agile and technology-based growth platforms in the fields of energy, climate, and water technologies, etc. -We have a planned budget of USD 5 Billion (TRY 130 Billion) for SDG-related Capex & Opex investments, the majority of which are directly related to climate and associated areas like water, between 2022 and 2027.

W7.4

(W7.4) Does your company use an internal price on water?

Row 1

Does your company use an internal price on water?

Yes

Please explain

Water is considered a fundamental commodity and an essential input in certain aspects of our operations. To acknowledge its importance, two of our group companies, Brisa and Kordsa, have implemented an internal price on water. This enables them to incorporate water-related costs and anticipate potential financial impacts, encompassing both risks and opportunities, into their financial planning. They carefully plan their water budget, aligning it with production estimations and anticipated water costs. Additionally, since water costs are part of their operating expenses (OPEX), they factor them into their budget planning and consider them crucial in evaluating water-related capital expenditures (CAPEX).

W7.5

(W7.5) Do you classify any of your current products and/or services as low water impact?

	Products and/or services classified as low water impact	Definition used to classify low water impact	Primary reason for not classifying any of your current products and/or services as low water impact	Please explain
Row 1	Yes	Although the specific definition of low water impact may differ across different business units, it generally encompasses technologies, services, and products aimed at preventing water pollution, enhancing water efficiency, and minimizing water withdrawal. As Sabancı Holding, we define our impact on water resources on an industry basis and conduct studies to ensure efficiency, recovery, and savings in order to manage water sustainability. Some examples of low-water impact services provided by our group companies are as follows: - Akbank offers three different credits under the Blue Finance framework, namely Blue Tourism Loans, Blue Port Loans, and Blue Transportation Loans, to develop sustainable tourism, reduce the environmental footprint in marine tourism activities, protect seas in port operations, and accelerate the transition to low carbon. These three credits have been implemented to support the reduction of environmental footprint in tourism, the protection and enhancement of seas, the conservation of biodiversity, and the support of pollution control efforts. The financing provided by the Blue Tourism Loan includes new hotel construction, refinancing of existing hotels, renovation of existing buildings, investments related to sustainability in hotels, integration of green buildings, waste management, biodiversity projects, water and wastewater management, and energy efficiency initiatives. The Blue Port Loan has been implemented to finance new port construction, port refinancing, all sustainability-related activities in ports, waste management, circular economy projects, biodiversity projects, as well as water and wastewater management. Akbank offers the Blue Transportation Loan to those who want to use financing for purchasing new maritime transportation vehicles (for tourism or commercial purposes), investing in alternative fuels, accelerating the transition to low carbon, and renewing and replacing energy-efficient and environmentally friendly machinery and equipment. -In line with Brisa's sustainability goals, Brisa started to use MBR membrane filter technology to recycle the wastes of the well water filtration system. With this project, the waste of the filtration system is recycled at a 95% efficiency rate and returned to the water cycle. -CarrefourSA utilizes the "Bizim Bahce" application to cultivate certain vegetable products within its stores, employing a low water impact approach. The system operates by continuously monitoring the production area alongside buyers and activating essential elements such as mineral heat and light when needed. Through water conversion within the system, it achieves a remarkable 90% reduction in water usage compared to traditional production methods. - Enerjisa Uretim produces energy through various means including hydroelectric power plants (HEPPs), solar power plants (SPPs), wind power plants (WPPs), and natural gas combined cycle systems. Solar and wind power plant installations have a low water impact as they generate electricity using solar and wind panels, which do not require water for operation. Unlike conventional power plants that rely on water for cooling purposes, solar power plants harness the sun's energy and wind power plants utilize the wind's energy directly, eliminating the need for significant water consumption.	<Not Applicable>	Sabancı Holding and its investee companies are committed to implementing low-water impact practices and technologies to promote water sustainability and minimize the environmental footprint. Through various initiatives and projects, such as the Blue Finance framework offered by Akbank, the adoption of MBR membrane filter technology by Brisa, the "Bizim Bahce" application used by CarrefourSA, and the utilization of renewable energy sources by Enerjisa Uretim, these companies are actively contributing to the conservation and responsible management of water resources. By prioritizing water efficiency, pollution prevention, and the development of sustainable solutions, we aim to foster a more sustainable future for both the business sector and the community at large.

W8. Targets

W8.1

(W8.1) Do you have any water-related targets?

Yes

W8.1a

(W8.1a) Indicate whether you have targets relating to water pollution, water withdrawals, WASH, or other water-related categories.

	Target set in this category	Please explain
Water pollution	Yes	<Not Applicable>
Water withdrawals	Yes	<Not Applicable>
Water, Sanitation, and Hygiene (WASH) services	Yes	<Not Applicable>
Other	Yes	<Not Applicable>

W8.1b

(W8.1b) Provide details of your water-related targets and the progress made.

Target reference number

Target 1

Category of target

Water pollution

Target coverage

Business division

Quantitative metric

Increase in water use met through recycling/reuse

Year target was set
2021

Base year
2021

Base year figure
15507

Target year
2025

Target year figure
80000

Reporting year figure
31373

% of target achieved relative to base year
24.6011195013412

Target status in reporting year
Underway

Please explain
As Sabancı Group, we adopt a proactive approach to continuously improve our environmental performance in all our activities. While implementing environmental practices beyond legal obligations, we aim to apply the best available production techniques and minimize our impact on natural resources.

Brisa, an investee company operating in the industrial sector and specializing in tire manufacturing, aims to significantly increase the utilization of recycled water at its Izmit plant. In 2021, the company utilized 15,507 m3 of recycled water in its processes. The company's target is to raise this amount to 80,000 m3 annually, representing a more than 400% increase. However, in 2022, Brisa managed to achieve approximately 25% of its target by increasing the figure to 31,373 m3, which is a 102% increase compared to the previous year.

To enhance the use of recycled water and reduce groundwater withdrawals, Brisa made a strategic investment in 2021 by establishing a new wastewater treatment plant. This plant allows the reuse of wastewater from cooking presses as cooling water after proper treatment. Additionally, in 2022, Brisa constructed a new treatment plant with a $75,000 investment, specifically to increase recycled water usage. Furthermore, in collaboration with Kocaeli Metropolitan Municipality in 2023, Brisa decided to replace groundwater with gray water to further support their water conservation efforts.

Target reference number
Target 2

Category of target
Water withdrawals

Target coverage
Business division

Quantitative metric
Other, please specify (Reduction in withdrawals per tonnage of sales)

Year target was set
2019

Base year
2019

Base year figure
18.51

Target year
2030

Target year figure
9.25

Reporting year figure
13.95

% of target achieved relative to base year
49.244060475162

Target status in reporting year
Revised

Please explain
As Sabancı Group, we adopt a proactive approach to continuously improve our environmental performance in all our activities. While implementing environmental practices beyond legal obligations, we aim to apply the best available production techniques and minimize our impact on natural resources.

Almost all of our investees engaged in production activities have water reduction targets due to high water usage, and Kordsa is one of these companies with such a target. This target encompasses all of Kordsa's global tire-reinforcement production activities, which constitute 99.37% of the total volume of water withdrawals. The company's objective is to achieve a 50% reduction in water withdrawal per ton of sales by the year 2030. This goal was established in 2019, using the same year as the base reference. In 2022, the target was revised, previously reported based on per ton of production. In 2019, the intensity figure for water withdrawal per ton of product was 18.51 m3/ton. Remarkably, this figure declined to 13.95 m3/ton in 2022, indicating a significant decrease of 24.62%.

Target reference number
Target 3

Category of target

Water, Sanitation and Hygiene (WASH) services

Target coverage
Business division

Quantitative metric
Other, please specify (Increasing WASH Score according to WBCSD Self-Assessment Tool)

Year target was set
2021

Base year
2021

Base year figure
85

Target year
2024

Target year figure
90

Reporting year figure
94

% of target achieved relative to base year
180

Target status in reporting year
Achieved

Please explain
As Sabancı Group, we believe that all of our employees have the right to work in conditions that respect human dignity, in a healthy and safe environment. We also expect the same approach from our stakeholders who are part of our value chain.

CarrefourSA, as one of our investee companies operating in the retail sector, strives to protect the right to clean water and ensure a healthy working environment, as stated in its water policy. In line with its commitment to corporate social responsibility, CarrefourSA understands the significance of continuous monitoring of Water, Sanitation, and Hygiene (WASH) services. To assess its performance, the company utilizes the Self-Assessment Tool for Evaluating Access to Water, Sanitation, and Hygiene (WASH) developed by the World Business Council for Sustainable Development (WBSCD). This tool covers various categories, including general aspects, workplace water supply, workplace sanitation, workplace hygiene, value/supply chain WASH, and community WASH. In 2021, CarrefourSA achieved an overall score of 85% according to this tool. The company aims to further improve its performance and reach a score of 90% by 2024, addressing the areas of improvement in each category and implementing appropriate measures. Notably, the inclusion of WASH criteria in social compliance audits conducted for its private label suppliers was one of the significant steps taken. As a result of these efforts, CarrefourSA successfully increased its overall score to 94% in the evaluation conducted in 2022.

W9. Verification

W9.1

(W9.1) Do you verify any other water information reported in your CDP disclosure (not already covered by W5.1a)?
Yes
Sabancı Group 2022 Data Table Assurance Report İmzalı Combined (1).pdf

W9.1a

(W9.1a) Which data points within your CDP disclosure have been verified, and which standards were used?

Disclosure module	Data verified	Verification standard	Please explain
W1 Current state	Total water withdrawal Total water discharge Total water consumption Total withdrawal volume of surface water (river/lake/rainwater) Total withdrawal volume of third-party sources (including mains water) Total withdrawal volume of groundwater	ISAE 3000	Our main economic, environmental and social indicators including water related data have been verified by external assurance provider PWC in accordance with ISAE 3000 standards.

W10. Plastics

W10.1

(W10.1) Have you mapped where in your value chain plastics are used and/or produced?

	Plastics mapping	Value chain stage	Please explain
Row 1	Yes	Direct operations Supply chain Product use phase	We are a member of the Business Plastic Initiative, initiated by the Business Council for Sustainable Development Türkiye, with the aim of reducing plastic waste in the private sector. Throughout all stages of our value chain, we diligently track the quantity and type of plastic used. As part of our commitment to sustainability, our group-wide objective is to achieve a 100% reduction in single-use plastics by the end of 2023. Accordingly, we prioritize monitoring the usage of these plastics and taking actions to eliminate them. In 2022, Sabancı Holding and its investees utilized a total of 229.99 tons of single-use plastic products. These products encompass various types of plastics, such as PET, HDPE, PP, PS, and PC. Compared to the year 2021, we achieved a notable 37% reduction in the usage of these products.

W10.2

(W10.2) Across your value chain, have you assessed the potential environmental and human health impacts of your use and/or production of plastics?

	Impact assessment	Value chain stage	Please explain
Row 1	Yes	Direct operations Supply chain Product use phase	Plastics can have varying characteristics and environmental impacts based on their composition. PET (polyethylene terephthalate) is a clear and lightweight plastic commonly used in bottles, food packaging, and clothing. It degrades slowly, taking hundreds of years, and can leach harmful chemicals like phthalates into food and water, linked to health problems. HDPE (high-density polyethylene) is a durable plastic used in bottles, toys, and containers, degrading more slowly than PET, taking up to 1,000 years. While it releases fewer harmful chemicals, it can still emit phthalates and toxins. PP (polypropylene) is versatile and used in food packaging, straws, and bags, degrading over about 500 years, releasing fewer toxins. PS (polystyrene), common in food packaging, cups, and cutlery, breaks down relatively quickly, within 50 years, and can leach harmful chemicals like styrene. PC (polycarbonate), used in eyewear and food containers, takes up to 1,000 years to break down, and can release harmful chemicals like BPA, associated with health issues.

W10.3

(W10.3) Across your value chain, are you exposed to plastics-related risks with the potential to have a substantive financial or strategic impact on your business? If so, provide details.

	Risk exposure	Value chain stage	Type of risk	Please explain
Row 1	No, risks assessed, and none considered as substantive	<Not Applicable>	<Not Applicable>	At Sabancı Group, we make sure to comply with the Packaging Waste Control Regulation in all our operations and collaborate with licensed companies to recycle or dispose of such waste. Although there is currently no regulation in Turkey specifically impacting plastic usage with significant financial implications, we remain committed to adopting the circular economy approach. We actively follow global regulations and work proactively to address any potential risks associated with plastic usage. Additionally, we participate in the Business Plastic Initiative to contribute to responsible plastic management and reporting practices.

W10.4

(W10.4) Do you have plastics-related targets, and if so what type?

	Targets in place	Target type	Target metric	Please explain
Row 1	Yes	Plastic goods	Eliminate single-use plastic goods	We are a member of Business Plastic Initiative, launched by the Business Council for Sustainable Development Türkiye, to reduce plastic waste in the private sector. We aim to reduce the consumption of disposable plastics by 100% by the end of 2023. In this context, we first aim to prevent the unnecessary use of plastic and switch to the reuse model where possible. Our estimation shows that we have reduced nearly 50% of single-use plastics by the end of 2022. Moving forward, we will strive to increase the quality of our tracking systems and reduce the remaining amount of single-use plastics. We plan to focus on using recycled plastics and reducing plastic consumption across the entire value chain. By the end of 2023: - We will implement a store model in line with the Zero Waste Platinum concept in at least 10% of Carrefoursa and Teknosa stores. -We will offer our customers reusable packaging in the fresh produce section in all Carrefoursa stores and the option to sell products through containers provided by our costumers in at least 10 Carrefoursa stores. - To reduce the use of packaging, we will commission refill stations for select products in at least ten stores and commence planning to make this practice more common. -At Carrefoursa stores, we will have sustainable products serving as alternatives to disposable straws, plastic cutlery, plastic plates, plastic cotton swabs, plastic tea and coffee stirrers, and plastic cups.

W10.5

(W10.5) Indicate whether your organization engages in the following activities.

	Activity applies	Comment
Production of plastic polymers	No	N/A
Production of durable plastic components	No	N/A
Production / commercialization of durable plastic goods (including mixed materials)	No	N/A
Production / commercialization of plastic packaging	No	N/A
Production of goods packaged in plastics	No	N/A
Provision / commercialization of services or goods that use plastic packaging (e.g., retail and food services)	No	N/A

W11. Sign off

W-FI

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

You can access the annual activity report from the attached document and the relevant link: https://yatirimciiliskileri.sabanci.com/en/images/pdf/2022-annual-report.pdf

You can also access the sustainability report for the year 2022 in the attachment.
SBN_SRDE_2022_uyg97_NY.pdf
2022-annual-report.pdf

W11.1

(W11.1) Provide details for the person that has signed off (approved) your CDP water response.

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

Submit your response

In which language are you submitting your response?
English

Please confirm how your response should be handled by CDP

	I understand that my response will be shared with all requesting stakeholders	Response permission
Please select your submission options	Yes	Public

Please indicate your consent for CDP to share contact details with the Pacific Institute to support content for its Water Action Hub website.
No

Please confirm below
I have read and accept the applicable Terms