

SUSTAINABILITY REPORTING

SUPPLEMENTARY INFORMATION

ADDITIONAL SOCIAL PERFORMANCE INDICATORS

Metric ¹	Training Breakdown by Gender and Age (h)			
	2021	2022	2023	2024
Female	425,716	427,561	578,270	500,580
Male	1,082,663	1,216,627	1,044,814	1,332,965
Under 30	482,471	568,044	407,936	585,070
30-50 years old	995,283	1,045,117	1,174,941	1,186,463
Over 50	30,623	31,025	40,207	62,010

2024	
Workforce Gender Breakdown	Share (%)
Women in top management positions ²	46%
Women in junior management positions ³	44%

ADDITIONAL INFORMATION SECURITY/CYBERSECURITY INDICATORS

Topic	Breaches		
	2022	2023	2024
Total number of information security breaches	0	0	0
Total number of information security breaches	0	0	0

Please note that the duration of annual paid leave cannot be less than the minimum period set out in the legislation of the countries of operation. Across the Group, leave entitlements are implemented at levels that exceed legal requirements.

ADDITIONAL POLICY INFLUENCE INDICATORS

Spending (Turkish Liras)	Year					
	2019	2020	2021	2022	2023	2024
Lobbying, interest representation or similar ⁴	0	0	1,198,000	4,059,236	4,835,191	6,303,538
Local, regional or national political campaigns / organizations / candidates	0	0	0	0	0	0
Trade associations or tax-exempt groups (e.g. think tanks) ⁵	0	0	402	708	1,050,000	1,740,000
Other (e.g. spending related to ballot measures or referendums)	0	0	0	0	0	0
Total contributions and other spending	0	0	1,600,000	4,767,236	5,885,191	8,043,538
Data coverage (% of total revenues)	0	0	100	100	100	100

¹ The difference between the total training figures in this document and those in the Sustainability Report is due to a restatement and using the most updated data in this web-site.

² Top management positions include women managers at most two levels away from the CEO.

³ Junior management positions include women managers who are first-line managers, junior managers and the lowest level of management within Sabancı Group's hierarchy.

⁴ This metric includes spending related to the World Business Council for Sustainable Development (WBCSD), TL 5,962,000 and the United Nations Global Compact (UNGC), TL 341,538.

⁵ This metric includes spending related to the Turkish Industry and Business Association (TÜSIAD).

External Stakeholder Engagement on Climate and The SDGs

Sabancı Holding's executive committee and senior management actively engages with public institutions, trade associations, and industry bodies to contribute processes such as the formulation or implementation of new standards and regulations on sustainability. Leveraging its internal expertise, Sabancı Holding's Sustainability Directorate also contributes to shaping public policies, including nature and climate-related initiatives, with the goal of accelerating sectoral development and facilitating the transition to a low-carbon economy.

The Holding ensures that all engagements on public policy activities and trade association memberships are fully aligned with its overarching sustainability objectives in all jurisdictions where Sabancı Holding operates. Sustainability Directorate provides advice to other functions and Executive Committee members where relevant and needed on the alignment of such endorsements and climate-related initiatives with the Holding's higher purpose and the goals of the Paris Agreement.

Critical actions such as the endorsement of a global sustainability initiative are approved by the CEO, and when necessary, referred to the relevant Group Presidents, Sustainability Leadership Committee and the Board of Directors' Sustainability Committee for further review and approval.

Coordination between the Sustainability Department and Corporate Brand Management and Communications ensures that external communications remain consistent and fully aligned with the goals of Paris Agreement and the SDGs, reinforcing the company's commitment to sustainable development in the eyes of stakeholders, including shareholders and investors.

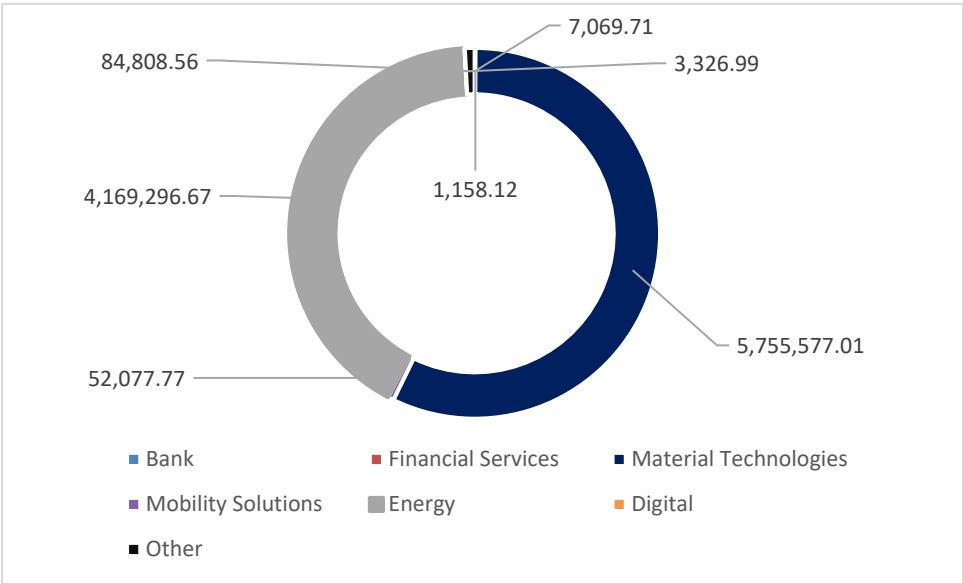
The Communication Committee, consisting of the CEO, CFO, finance, investor relations, sustainability and human capital functions, alongside with the corporate brand management and communications teams, ensures the alignment on the Holding's position on external communications and public initiatives, while deciding on mitigating actions if any inconsistencies between the external engagement and the Holding's position on the SDGs and the Paris Agreement are detected.

The platforms that are engaged and the initiatives endorsed are monitored by relevant departments such as sustainability and strategy teams. Such platforms are publicly disclosed on an annual basis in Sustainability Reports.

ADDITIONAL ENVIRONMENTAL PERFORMANCE INDICATORS

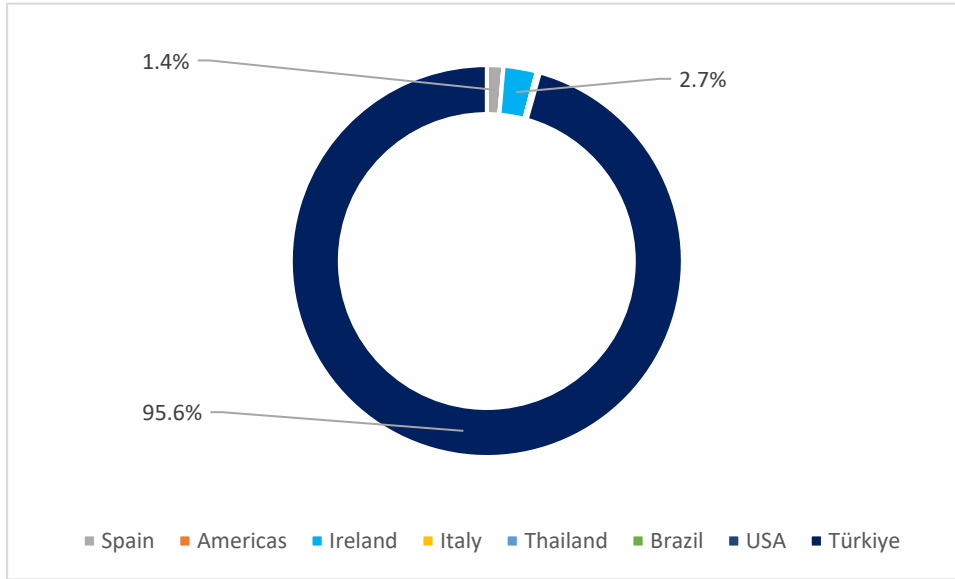
Scope 3 GHG Emissions Sectoral/Industry & Regional Breakdown

Sectoral Breakdown; 2024



Industry	Scope 3, tCO ₂ e	%
Bank	7,069.71	0.1%
Financial Services	1,1158	0.0%
Material Technologies	5,755,577	57%
Mobility Solutions	52,078	1%
Energy	4,169,297	41%
Digital	3,327	0.0%
Other	84,809	1%

Regional Breakdown; 2024



Region	Scope 3, tCO ₂ e	%
Türkiye	9,632,989	95.6%
Spain	136,196	1.4%
Ireland	276,053	2.7%
Thailand	7,339	0.1%
Americas	1,668	0.0%
Italy	246	0.0%
USA	15,916	0.2%
Brazil	2,906	0.0%

	2020	2021	2022	2023	2024
Scope 3 GHG Emissions Intensity, tCO ₂ e	171.14	118.34	21.39	20.35	17.39

2024	
Industry	Scope 3 intensity, tCO ₂ e
Bank	0,01
Financial Services	0,02
Material Technologies	80,02
Mobility Solutions	1,00
Energy	16,90
Digital	0,05
Other	1,11
2023	
Industry	Scope 3 intensity, tCO ₂ e
Bank	0,03
Financial Services	0,02
Material Technologies	88,08
Mobility Solutions	2,06
Energy	18,60
Digital	0,09
Other	1,51
2022	
Industry	Scope 3 intensity, tCO ₂ e
Bank	0.04
Financial Services	0.00
Material Technologies	11.81
Mobility Solutions	0.13
Energy	9.22
Digital	0.01
Other	0.19
2021	
Industry	Scope 3 intensity, tCO ₂ e
Bank	0.26
Financial Services	0.01
Material Technologies	65.27
Mobility Solutions	0.73
Energy	50.98
Digital	0.06
Other	1.04

Scope 2 GHG Emissions Breakdown (tco ₂ e)	2021	2022	2023	2024
Scope 2 (market-based)	1,227,675	887,826	863,964	842,520
Scope 2 (location-based)	1,227,675	1,118,018	1,111,156	1,223,959

Water Management (m ³)	2021	2022	2023	2024
Water consumption	9,258,621	8,429,288	8,034,293	8,910,471
Water withdrawal⁶	10,647,280	10,026,518	342,264,156	316,761,476
Water withdrawal (excluding sea water)⁷	10,647,280	10,026,518	9,301,239	11,860,561
Water recycled and reused	23%	31%	38%	26%
Total amount of discharged water	5,378,280	2,340,655	334,229,864	307,881,856
Total amount of discharged water (excluding sea water)	5,378,280	2,340,655	1,550,560	3,139,856
Total net freshwater consumption	5,269,000	8,429,288	8,148,879	8,910,471

ADDITIONAL MATERIALITY INDICATORS

MATERIALITY METRICS FOR EXTERNAL STAKEHOLDERS

	Impact 1	Impact 2
Material Issue for External Stakeholders	Climate Emergency	Responsible Investment and Sustainable Business Models
Output Metric	Change in GHG Emissions (%) against 2021 in 2024: Scope 1&2: 1,517,491	Reduced and Avoided Emissions
Impact Valuation	Environmental value lost&gained Avoided social cost of carbon through mitigation	Social cost caused/avoided Avoided social cost of carbon through investments
Impact Metric	<p>Avoided Social Cost of Carbon in 2024: USD 200 million Assumptions: The amount of avoided CO₂e and the avoided cost of carbon is calculated based on the following assumptions: 1) As of 2030, the total amount of renewable installed capacity is expected to reach 7 GW by Sabancı Climate Technologies and Enerjisa Üretim, our investee company in Türkiye. The total amount of energy generation with average capacity factors are calculated and then multiplied with the estimated grid emission factor of Türkiye in 2030. Grid emission factor of which is 0.437 kg CO₂/kWh in 2020, will be reduced to 0.352** kg CO₂/kWh through the new renewable energy installed power capacity. The resulting GHG emissions avoidance is multiplied with the social cost of carbon*** 2) Sabancı Holding estimates the benefit, i.e. avoided social cost of CO₂, of reducing its GHG emissions by 42% as of 2030 compared to 2021 according to the following formula: Amount of Scope 1 & 2 CO₂e reduction by 2030 compared to 2021 is multiplied by USD 152, i.e. the social cost of carbon in 2030. Sabancı Holding estimates the benefit of reducing its GHG emissions only in 2023 according to the following formula: Avoided social cost of CO₂: Amount of CO₂e reduction between 2021-2024 (1,517,491 tonnes of CO₂e x USD 132* = USD 200,308,812 Amount of CO₂e reduction to be done in 2030 (4,706,206 tonnes of CO₂e x USD 152) = USD 715,343,464 *(USD 2007/metric ton CO₂) USD 132 (USD 2007/metric ton CO₂) corresponds to social cost of carbon in high Impact (95th Pct at 3%) scenario for 2023. USD 152 (USD 2007/metric ton CO₂) corresponds to social cost of carbon in high Impact (95th Pct at 3%) scenario for 2030.</p> <p>Note that the unit cost is only for CO₂, whereas the amount of reduction is in CO₂ equivalent terms.</p> <p>The Social Cost of Carbon: Estimating the Benefits of Reducing Greenhouse Gas Emissions EPA and other federal agencies use estimates of the social cost of carbon (SC-CO₂) to value the climate impacts of rulemakings. The SC-CO₂ is a measure, USD, of the long-term damage done by a ton of carbon dioxide (CO₂) emissions in a given year. The SC-CO₂ is meant to be a comprehensive estimate of climate change damages and includes changes in net agricultural productivity, human health, property damages from increased flood risk, and changes in energy system costs, such as reduced costs for heating and increased costs for air conditioning. However, given current modelling and data limitations, it does not include all important damages. This USD figure also represents the value of damages avoided for a small emission reduction (i.e., the benefit of a CO₂ reduction). USD 132 (USD 2007/metric ton CO₂) corresponds to social cost of carbon in high Impact (95th Pct at 3%) scenario for 2024.</p>	

Targets/Metrics Linked to The Executive Compensation for Material Issues

Material Topic	Targets
Climate Emergency	<ul style="list-style-type: none"> Material Technologies Group companies' sustainability target realization rate including decarbonization, circular economy, biodiversity and water. — <i>Material Technologies Group President</i> Sustainability target realizations average of Mobility Solutions Group companies including decarbonization, circular economy and water. — <i>Mobility Solutions Group President</i>⁶ Decreasing Scope 1 & 2 GHG emissions intensity (tCO₂e/m² sales area) — <i>Finance Group President</i>
Responsible Investments and Sustainable Business Models	<ul style="list-style-type: none"> Financial services companies' SDG-linked product&service target realization: Diversifying the sustainable products and services — <i>Financial Services Group President</i> Sustainability-linked financing in Türkiye — <i>Energy Group President</i>
Circular Economy	<ul style="list-style-type: none"> Material Technologies Group companies' sustainability target realization rate including decarbonization, circular economy, biodiversity and water. — <i>Material Technologies Group President</i> Sustainability target realizations average of Mobility Solutions Group companies including decarbonization, circular economy and water. — <i>Mobility Solutions Group President</i>³

The above-mentioned targets are part of the performance goals of related executive management and impacts the annual compensation.

⁶ As of April 30, 2025, the Mobility Solutions Group structure was reorganized, and this Group Presidency position has been integrated into the new organizational structure alongside the other Group Presidencies.

ADDITIONAL RISK INDICATORS

RISK REVIEW

Risk 1	
Name of the Risk	Regulation and Compliance risks
Description of company-specific risk exposure	<p>At Sabancı Holding, Regulation and Compliance risk is classified as a critical-level risk following a comprehensive assessment of its impact, likelihood, vulnerability, and speed of onset. This risk is closely monitored and reported to the EDRC at least six times a year.</p> <p>Regulation risk is defined as the risk imposed by the change in regulatory environment in countries and industries where Sabancı Holding has operations in due to amendments to scope of laws and regulations (e.g. tax, tariffs, competition, trade barriers, etc.) and amendments to implementation of laws and regulations.</p> <p>While the Compliance risk is defined as risk of facing financial penalties, management liabilities or reputation loss due to failure in complying to regulations, laws or company's rules/regulations.</p>
Process/Framework to determine risk appetite	<p>Compliance Presidency is responsible for managing Regulation and Compliance risks within Sabancı Holding while the Risk Management and Audit Presidency also play a significant role in monitoring the risk management activities. These units report to the BoD when necessary, as three line model implies.</p> <p>The Holding maintains a low appetite for regulatory and compliance risks. Full adherence to applicable laws, regulations, and internal policies is expected across all operations. There is zero tolerance for intentional or negligent non-compliance, while minimal risk may be accepted in areas where regulatory interpretation is evolving, provided decisions are well-informed, documented, and aligned with ethical standards.</p>
Description of mitigating actions	<p>Some examples that we take to mitigate Regulation and Compliance risks are given below:</p> <ul style="list-style-type: none"> • We are monitoring the current legal cases that Sabancı Group face. For example, we closely monitor competition cases and give utmost importance to comply with the regulation. Regular compliance training for employees and management; dawn-raid simulations to reinforce readiness and awareness are provided. • We are following the significant regulatory changes that might have effect financially or reputationally and take necessary steps. For instance, changes in Retail Law were closely monitored by Carrefoursa and full compliance is provided through early engagement and process adjustments. Proactive tracking of significant regulatory changes (and implementing timely compliance measures are one of the mitigation actions we take. • Escalation protocols and periodic reporting to the Board and Audit Committee; integration into ERM dashboards are the regular actions we take. • We make use of compliance monitoring tools and automated alerts for high-risk areas for example complying with anti-money laundering activities.

Risk 2	
Name of the Risk	Cyber security-related risks
Description of company-specific risk exposure	<p>In Sabancı Holding, cyber security risk is determined as a critical level risk after assessing its impact, likelihood, vulnerability, speed onset scores and this risk is monitored closely and reported to the EDRC and BoD at least six times in a year. Cyber security risk is described as the risk of high costs, inefficiency or ineffectiveness in operations (i.e. timely and complete access to internal information, response time, availability) due to</p> <ul style="list-style-type: none"> • Limited or ineffective security, storage, sharing of information • Insufficient IT infrastructure or applications that allow for rapid and successful adaptation to changing technological requirements (e.g. video conference applications in the pandemic, product licences) • Effective controls over information security (e.g. GDPR breaches) • Lack of authorisation controls (e.g. fat finger operations)
Process/Framework to determine risk appetite	<p>Cyber security risks for Sabancı Holding and its Group companies are quantified by an external party, CyberCube. Sabancı Holding has decided to make its cybersecurity risks at a 97.5% confidence level and purchases the appropriate coverage accordingly.</p> <p>The Information Technology Unit is responsible for managing cybersecurity risks within Sabancı Holding while the Risk Management and Audit Units also play a crucial role in monitoring the cybersecurity risk management activities.</p>

Description of mitigating actions

Sabancı Holding adopts a multi-layered and proactive approach to mitigate cyber security risks across its group companies. Below are key measures and practices implemented to strengthen our cyber resilience:

- **Robust Access Controls and Infrastructure Hardening**
We continuously enhance access control mechanisms and infrastructure security to prevent unauthorized access and data breaches. All the cyber-attack attempts are monitored.
- **Regular System Updates and Security Controls**
All systems undergo periodic updates and vulnerability scans. Findings from internal audits and penetration tests are tracked and resolved promptly.
- **Employee Awareness and Training Programs**
Cybersecurity awareness is reinforced through regular employee training, phishing simulations, and role-based certifications. These programs are tailored to address evolving threat landscapes and ensure first-line engagement.
- **Penetration Testing and Incident Monitoring**
Penetration tests are conducted regularly, and critical findings are monitored via dashboards. Incident response protocols are in place to address breaches swiftly.
- **Cyber Insurance Coverage**
Sabancı Holding maintains a high-limit umbrella cyber insurance policy covering both the Holding and its subsidiaries.
A dedicated Technology Professional Liability Insurance coverage has been added to the policy specifically for SabancıDX. This coverage addresses professional liability risks that may arise from SabancıDX's digital services.
- **Cyber Maturity Assessments by External Parties**
CyberCube reports are used to assess the cyber maturity of group companies. These assessments include threat modelling, exposure analysis, and benchmarking against industry standards.
- **Integration into Risk Governance Framework**
Cybersecurity risks are categorized under operational risks and reviewed monthly by the Risk Coordination Committee and quarterly by the EDRC.
- **Continuous Improvement and Strategic Alignment**
Cyber risk mitigation is aligned with Sabancı Holding's broader sustainability and governance strategy, ensuring resilience and long-term value creation.
A roadmap is being developed within the Sabancı Group through a collective intelligence approach, in collaboration with Cyber Minds participants, who are composed of company information security teams. This roadmap aims to shed light on the critical areas in cybersecurity where our companies should invest and take action in the short, medium, and long term.

Risk Culture

To promote a robust risk culture across Sabancı Holding, the Risk Directorate has developed a series of tailored training programmes aimed at enhancing employee awareness. These include the Corporate Risk Management Training, Major Corporate Crises and Their Consequences, and Risks Artificial Intelligence May Pose in Corporate Life. Each programme has been designed using artificial intelligence technologies and is delivered by an AI-generated instructor. By disseminating these trainings digitally, employees from various departments have been able to acquire foundational knowledge of risk concepts and internalize the organisation's approach to risk. These trainings have been assigned to employees via the company's internal platform, while non-executive committee members have received access through a dedicated YouTube link. These sessions serve not only as a means of knowledge transfer but also as a strategic tool to strengthen employees' ability to identify, interpret, and respond to risks effectively.

As part of our ongoing efforts to strengthen the organization's risk culture, the Risk Directorate conducts an annual Risk Perception Survey across all Sabancı Group companies, covering both global and Türkiye's risks. This survey is designed to capture employees' individual perceptions of risk based on their roles, locations, and experiences, and serves as a strategic tool to assess and enhance awareness across the organization. The survey is shared with all employees and executive personnel, with results analyzed and presented in one-on-one meetings with executive staff and through company-specific reporting formats. By comparing internal findings with global benchmarks such as WEF results, we gain valuable insights into how risk is perceived across different business units and geographies. This initiative not only helps identify potential blind spots and hidden risks but also supports the development of more inclusive and effective risk management strategies. Ultimately, the survey contributes to aligning individual and organizational risk perspectives, fostering a shared understanding and proactive approach to risk.

As an investment holding company, Sabancı Holding does not directly offer any products or services. However, in all the initiatives that we work on, we assess their alignment with sustainability related investment criteria. In 2024, 6 initiatives passed to the next phase – meaning performing a detailed feasibility / due diligence-, and for all these 6 initiatives we performed a deep dive E&S impact assessment as per our Group's Responsible Investment Policy. As a result, Sabancı Holding increased its understanding of sustainability profile of different industries.

Due to the confidentiality of the projects and the results of risk assessments, only the general scope of the assessment process can be shared. When a potential project is presented to Sabancı Holding, a project organization is established, and workstreams are formed to evaluate risks from various perspectives. These workstreams include experts and executives from departments such as risk, finance, human resources, sustainability, tax, legal, commercial, and technical. Many of these workstreams engage with different advisors throughout the Due Diligence (DD) process. Additionally, specific workstreams—focused on business plan & valuation, transaction documents & contract negotiation, and post-merger integration—are established to ensure the continuity of processes initiated by the project.

During the assessment process, risk simulations are conducted to evaluate assumptions and potential outcomes. These simulations consider various commercial and financial risk parameters, such as the probability of occurrence and the time period. At the end, an internal rate of return (IRR) is calculated, providing an assumption and overview of the project's risk for

Sabancı Holding. As part of the general audit process, the external independent auditor confirms that the Early Detection of Risk Committee (EDRC) convenes six times annually and reviews the meeting minutes as a standard procedure in their work.

Material Issues for External Stakeholders

Metric	Impact 1	Impact 2
Material Issue for External Stakeholders	Climate Emergency – Climate Transition & Physical Risks	Responsible Investment and Sustainable Business Models – Sustainable Products & Services
Cause of the Impact	Operations, Products/Services, Supply chain More than 50% of business activity	Operations, Products/Services, Supply chain More than 50% of business activity
External Stakeholder(s)/Impact Area(s) Evaluated	Environment Society Consumers/end-users External employees (e.g. organizations in the supply chain, contractors)	Environment Society Consumers/end-users External employees (e.g. organizations in the supply chain, contractors)
Topic Relevance on External Stakeholders	Climate emergency and its acute and physical risks, ranks among second material topic for Sabancı Holding's internal and external stakeholders. With operations from various business lines, Sabancı Holding's sectors have significant environmental impacts, both positive and negative. Therefore, the Company is committed to reducing its negative environmental footprint while maximizing positive contributions. For example, Sabancı Holding is focused on reducing its overall carbon emissions while simultaneously expanding in low-carbon technologies. The entire business value chain, as well as society and the environment, are considered exposed to these impacts. The physical and acute risks posed by climate change also drive Sabancı Holding to accelerate its expansion into low-carbon businesses, products, and services. As a result, while these risks present significant challenges, they also create opportunities for the company to invest in disruptive technologies and make a positive impact.	Sabancı Holding follows emerging technologies that align with the company's new economy areas while transforming its core businesses and portfolio. This approach ensures value protection by preserving core businesses while driving growth and generating positive impacts during value creation phase. We seek opportunities that deliver financial returns and benefit for stakeholders by supporting innovative solutions that reshape industries and align with sustainable practices. Key investment areas include energy and climate tech, material tech, mobility solutions, and digital tech. We recognize that growing technologies may have both positive and negative impacts on the environment and society. I.e. while CCUS can remove carbon from the atmosphere, there are concerns about potential environmental and social consequences, which must be carefully evaluated. Sabancı Holding carefully investigates the environmental and social impact of new investments through its Responsible Investment Policy.
Type of Impact	Both negative and positive	Both negative and positive

ADDITIONAL INFORMATION SECURITY INDICATORS

Information Security Committee

Sabancı Holding ensures oversight of information security through its Information Security Committee. The Committee consists of senior executives representing critical functions, including the Digital Director, Risk Director, Audit Director, Technology Manager, Human Resources Manager, Security Manager, and Corporate Communications & Brand Manager.

When required, the Committee reports to the Board. In particular, the Risk Director is also a member of the Early Detection of Risk Committee (EDRC), which convenes six times per year and includes Board members, ensuring that material information security issues are escalated to Board level.

The Information Security Committee operates on clearly defined principles to ensure effective governance of information security. Risks are assessed through a multi-disciplinary lens, considering not only technical aspects but also communication, processes, reputation, and regulatory compliance. All decisions are aligned with the company's overall strategy and digital transformation objectives, and they are documented with clear responsibilities and timelines to ensure transparency and accountability. Policies and actions are designed to be applicable and sustainable by integrating them into business processes at the operational level. The follow-up of decisions and actions is coordinated by the Technology Manager and, when necessary, reported to senior management.

The Information Security Committee convenes regularly every two months in accordance with a pre-determined schedule. Each meeting agenda is prepared at least one week in advance under the coordination of the Technology Manager. In addition to these routine meetings, extraordinary meetings may be called in cases of critical information security risks, incidents, or regulatory changes. Such meetings can be initiated either by the Technology Manager or at the request of at least two committee members. At the end of each year, the Committee holds an annual evaluation meeting to review the effectiveness of its operations, assess the impact of decisions taken, and evaluate the overall risk outlook.