AKENERJİ ELEKTRİK ÜRETİM A.Ş.

CDP Corporate Questionnaire 2026

Word version

Important: this export excludes unanswered questions
This document is an export of your organization's CDP questionnaire response. It contains all data points for questions that are answered or in progress. There may be questions or data points that you have been requested to provide, which are missing from this document because they are currently unanswered. Please note that it is your responsibility to verify that your questionnaire response is complete prior to submission. CDP will not be liable for any failure to do so.
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09/18/2026, 02:53 pm

Contents

C1. Introduction

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

Select from:

☑ English

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

Select from:

☑ USD

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

(1.3.2) Organization type

Select from:

☑ Publicly traded organization

(1.3.3) Description of organization

Akenerji Elektrik Üretim A.Ş. (hereinafter referred to as Akenerji) was established in 1989 as Türkiye's first electricity generation company with autoproducer group status. Since 2005, Akenerji has operated as an independent power producer through the strategic partnership between Akkök Holding and CEZ Group. At year-end 2025, Akenerji operates with a total installed capacity of 1,224 MW, including 904 MW of natural gas combined cycle capacity, 292 MW of hydroelectric capacity and 28.2 MW of wind power capacity. Renewable energy sources account for 26% of the Company's total installed capacity. In 2025, Akenerji achieved total gross electricity generation of 3,772,753 MWh. Its diversified generation portfolio consists of one natural gas combined cycle power plant, one wind power plant and seven hydroelectric power plants. This structure supports operational flexibility, supply security and resource diversification. The renewable portfolio, composed of hydroelectric and wind power plants commissioned between 2009 and 2012, supports the integration of alternative energy sources into the electricity system. Akenerji shapes its investment and portfolio management decisions in line with the transformation of the energy sector, supply security needs and the transition to low-carbon energy systems. In 2025, the Company initiated an investment in a 7.79 MW solar power plant at the Erzin Natural Gas Combined Cycle Power Plant site to meet part of the plant's internal electricity consumption from renewable sources, increase efficiency and support low-carbon generation objectives. Akenerji also continued feasibility studies for the Burç Bendi HEPP hybrid power plant project. Akenerji is aware of its responsibility to contribute to climate change mitigation and the transition to a more sustainable energy system. The Company has been reporting to CDP under the Climate Change heading since 2010 and under the Water Security Program since 2015. Akenerji also continues to participate in the BIST Sustainability Index, in which it has been included since 2016. In the 2024

assessment, Akenerji's ESG Combined Score was 70 and its sustainability governance score increased from 70 to 79. Sustainability is integrated into Akenerji's strategic decision-making processes and managed through a structured governance approach. In 2025, the Company renewed its Sustainability Policy and established the Sustainability Committee's Rules of Procedure. Through the Sustainability Committee, Akenerji defines its sustainability strategy, policies and targets, monitors sustainability performance and develops short-, medium- and long-term roadmaps. The Committee also identifies and assesses climate-related risks and opportunities with the Strategic Planning and Risk Management Department. Akenerji manages its environmental and social impacts through a systematic and measurable approach. The Company aims to protect natural life, prevent environmental pollution and reduce environmental impacts through efficiency-focused production and technology-based applications. In 2025, Akenerji generated 1,446,051 GJ of renewable energy. Although Akenerji is not a formal signatory to the UN Principles for Responsible Investment, it considers the six principles in investment decisions, observes compliance with its ESG policy and reports annually through the "Comply or Explain" approach. Akenerji has also been a participant in the United Nations Global Compact since 2022 and commits to integrating its ten principles into its business practices. Akenerji engages with employees, shareholders, financing institutions, customers, suppliers, public institutions, local authorities, local communities, sectoral associations and civil society organizations. The Company reviews its stakeholder identification and prioritization process every two years and uses e-mail, surveys, meetings, website disclosures, investor presentations, supplier reviews and social responsibility projects. Akenerji strengthens transparency in sustainability reporting through CDP Climate Change and Water Program reporting, sustainability reports, integrated annual reports, UN Global Compact progress reports, TCFD-TNFD reporting and the Türkiye Sustainability Reporting Standards Report. As of year-end 2025, Akenerji had 225 employees. In 2025, the Company increased its Corporate Governance Rating to 9.62 and obtained a 20-year electricity trading license in Greece through Aken Europe B.V.
[Fixed row]

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

(1.4.1) End date of reporting year

12/31/2025

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

Select from:
☑ Yes

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

Select from:
☑ Yes

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

Select from:

☑ 3 years

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

Select from:

☑ 3 years

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

Select from:

☑ 3 years

[Fixed row]

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

573521981

(1.5) Provide details on your reporting boundary.

	Is your reporting boundary for your CDP disclosure the same as that used in your financial statements?
	Select from: ☑ Yes

[Fixed row]

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

ISIN code - bond

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

ISIN code - equity

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ Yes

(1.6.2) Provide your unique identifier

TRAAKENR91L9

CUSIP number

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

Ticker symbol

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ Yes

(1.6.2) Provide your unique identifier

"AKENR" has traded on Borsa İstanbul since 2000.

SEDOL code

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

LEI number

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ Yes

(1.6.2) Provide your unique identifier

7890006JO4YATIQAG941

D-U-N-S number

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

Other unique identifier

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

[Add row]

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

Select all that apply

☑ Türkiye

(1.16) In which part of the electric utilities value chain does your organization operate?

Electric utilities value chain
☑ Electricity generation
☑ Electricity purchasing

(1.16.1) For your electricity generation activities, provide details of your nameplate capacity and electricity generation specifics for each technology employed.

Coal - Hard

(1.16.1.1) Own or control operations which use this power generation source

Select from:
☑ No

Coal - Brown

(1.16.1.1) Own or control operations which use this power generation source

Select from:
☑ No

Oil

(1.16.1.1) Own or control operations which use this power generation source

Select from:
☑ No

Gas

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ Yes

(1.16.1.2) Nameplate capacity (MW)

904

(1.16.1.3) Gross electricity generation (GWh)

3371.1

(1.16.1.4) Net electricity generation (GWh)

3304.83

(1.16.1.5) Comment

Reported figures represent installed capacity and electricity generation from assets under operational control during the reporting year. Net generation represents electricity supplied to the grid after deducting auxiliary consumption.

Sustainable biomass

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Other biomass

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Waste (non-biomass)

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Nuclear

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Fossil-fuel plants fitted with carbon capture and storage

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Geothermal

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Ocean thermal

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Hydropower

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ Yes

(1.16.1.2) Nameplate capacity (MW)

292

(1.16.1.3) Gross electricity generation (GWh)

319.01

(1.16.1.4) Net electricity generation (GWh)

314.58

(1.16.1.5) Comment

Reported figures represent installed capacity and electricity generation from assets under operational control during the reporting year. Net generation represents electricity supplied to the grid after deducting auxiliary consumption.

Onshore wind

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ Yes

(1.16.1.2) Nameplate capacity (MW)

28.2

(1.16.1.3) Gross electricity generation (GWh)

82.67

(1.16.1.4) Net electricity generation (GWh)

81.06

(1.16.1.5) Comment

Reported figures represent installed capacity and electricity generation from assets under operational control during the reporting year. Net generation represents electricity supplied to the grid after deducting auxiliary consumption.

Offshore wind

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Solar

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Wave

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Tidal

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Other renewable

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Other non-renewable

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☑ No

Total

(1.16.1.2) Nameplate capacity (MW)

1224

(1.16.1.3) Gross electricity generation (GWh)

3772.75

(1.16.1.4) Net electricity generation (GWh)

3700.46

(1.16.1.5) Comment

Reported figures represent installed capacity and electricity generation from assets under operational control during the reporting year. Net generation represents electricity supplied to the grid after deducting auxiliary consumption.
[Fixed row]

(1.24) Has your organization mapped its value chain?

(1.24.1) Value chain mapped

Select from:

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

(1.24.2) Value chain stages covered in mapping

Select all that apply

☑ Upstream value chain

☑ Downstream value chain

(1.24.3) Highest supplier tier mapped

Select from:

☑ Tier 1 suppliers

(1.24.4) Highest supplier tier known but not mapped

Select from:

☑ Tier 4+ suppliers

(1.24.7) Description of mapping process and coverage

At Akenerji, we recognize that value chain management is key for ensuring operational efficiency, sustainability, supply security and risk management across our electricity generation activities, procurement processes and stakeholder relationships. In 2025 our value chain covers suppliers that provide equipment, maintenance and repair services, technical support and consultancy services required for the operation of our generation facilities, while the downstream stage includes the supply of generated electricity to electricity markets. Sustainability-related considerations are integrated into our strategy, operations and investment planning, supported by Akenerji's Sustainability Policy. Our sustainability strategy focuses on adapting to the energy transition, strengthening a low-carbon generation portfolio, improving operational efficiency, managing natural resources and enhancing climate resilience. Supplier management is addressed as part of this approach. Active suppliers

are regularly evaluated through the Supplier Performance Evaluation process based on quality, on-time delivery and recipient evaluation criteria. In 2025 no suppliers were identified in the low performance category, while feedback was provided to suppliers requiring improvement. We expect suppliers to comply with the General Terms and Conditions of Purchase, contractual requirements, specifications, Akenerji Ethical Principles and obligations related to business ethics, human rights, working conditions and occupational health and safety. Environmental requirements are included in procurement processes. Suppliers are expected to comply with environmental legislation, ISO 14001 Environmental Management System requirements and Akenerji's Sustainability Policy. These obligations are included in supplier contracts, and compliance is monitored through certification tracking, supplier scorecards, rating systems and self-assessments. During the 2025 reporting period, supplier dependencies and environmental impacts related to climate change and water resources had not yet been fully assessed. However, Akenerji plans to conduct these assessments within the next two years. In prioritizing suppliers the Company aims to consider business risk reduction, regulatory compliance and strategic importance. Through these practices, Akenerji aims to strengthen procurement, supplier engagement and value chain resilience in line with regulatory expectations, market conditions and sustainability priorities.
[Fixed row]

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

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

Short-term

(2.1.1) From (years)

0

(2.1.3) To (years)

2

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

Akenerji defines the short term as 0–2 years, consistent with its operational planning, annual budgeting and near-term regulatory assessment periods. This horizon captures environmental risks and opportunities that may directly affect financial and operational performance during the reporting period or the following two years. Relevant considerations include fluctuations in energy-market prices, existing and emerging climate-related regulations, carbon-pricing developments, drought-related generation variability and extreme weather events that could affect operational continuity. Short-term findings inform generation planning, electricity trading, operational risk management, budgeting and the monitoring of regulatory compliance. In 2025, drought affected hydroelectric generation, demonstrating the relevance of physical climate risks within this horizon. Portfolio diversification, operational planning and market optimization are considered in managing short-term effects.

Medium-term

(2.1.1) From (years)

2

(2.1.3) To (years)

5

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

Akenerji defines the medium term as 2–5 years, reflecting the period over which regulatory developments, carbon-pricing mechanisms, energy-efficiency measures, technological transformation and portfolio-optimization investments may affect the Company. This horizon is used to assess the financial and operational implications of the energy transition, including potential carbon costs, changes in electricity-market conditions, changing precipitation patterns and the resilience of water-dependent generation assets. Medium-term assessments inform strategic planning, investment evaluation and financial analysis. Scenario-based assumptions concerning precipitation, generation, electricity prices, carbon prices and system usage costs are incorporated where relevant to evaluate potential effects on revenue, operating costs and EBITDA.

Long-term

(2.1.1) From (years)

5

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

Select from:

☑ No

(2.1.3) To (years)

20

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

Akenerji defines the long term as 5–20 years, aligned with the useful lives and investment-planning cycles of power-generation assets and the time required for structural changes in the energy system to affect the Company's business model. This horizon covers the energy transition, decarbonization, the long-term physical effects of climate change, water stress, infrastructure resilience and transformation of the generation portfolio. Long-term climate scenarios and financial assessments support the evaluation of potential effects on asset performance, generation capacity, investment requirements, operating costs and long-term value creation. The results inform portfolio-resilience assessments, capital-investment considerations and the evaluation of lower-carbon and resource-diversification opportunities. [Fixed row]

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

	Process in place	Dependencies and/or impacts evaluated in this process
	Select from: ☑ Yes	*Select from:* ☑ Both dependencies and impacts

[Fixed row]

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

	Process in place	Risks and/or opportunities evaluated in this process	Is this process informed by the dependencies and/or impacts process?
	Select from: ☑ Yes	*Select from:* ☑ Both risks and opportunities	*Select from:* ☑ Yes

[Fixed row]

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

Row 1

(2.2.2.1) Environmental issue

Select all that apply

☑ Climate change

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

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☑ Direct operations

☑ Upstream value chain

☑ Downstream value chain

(2.2.2.4) Coverage

Select from:

☑ Full

(2.2.2.5) Supplier tiers covered

Select all that apply

☑ Tier 1 suppliers

(2.2.2.7) Type of assessment

Select from:

☑ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

☑ Annually

(2.2.2.9) Time horizons covered

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(2.2.2.10) Integration of risk management process

Select from:

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

(2.2.2.11) Location-specificity used

Select all that apply

☑ Site-specific

☑ Local

☑ National

(2.2.2.12) Tools and methods used

Commercially/publicly available tools

☑ LEAP (Locate, Evaluate, Assess and Prepare) approach, TNFD

Enterprise Risk Management

☑ Enterprise Risk Management

International methodologies and standards

☑ Environmental Impact Assessment

☑ ISO 14001 Environmental Management Systems

Databases

☑ Regional government databases, please specify :TUIK (TurkStat), MGM (Turkish Meteorological Service)

Other

☑ Scenario analysis

☑ Desk-based research

☑ External consultants

☑ Materiality assessment

☑ Internal company methods

☑ Partner and stakeholder consultation/analysis

(2.2.2.15) Risk types and criteria considered

Acute physical

☑ Drought

☑ Heat wave

☑ Landslide

☑ Heavy precipitation (rain, hail, snow/ice)

☑ Flood (coastal, fluvial, pluvial, ground water)

☑ Storm (including blizzards, dust, and sandstorms)

Chronic physical

☑ Heat stress

☑ Water stress

☑ Changing wind patterns

☑ Temperature variability

☑ Precipitation or hydrological variability

☑ Increased severity of extreme weather events

☑ Water availability at a basin/catchment level

☑ Changing temperature (air, freshwater, marine water)

☑ Changing precipitation patterns and types (rain, hail, snow/ice)

Policy

☑ Carbon pricing mechanisms

☑ Changes to international law and bilateral agreements

☑ Changes to national legislation

Market

☑ Lack of availability and/or increased cost of raw materials

☑ Uncertainty in market signals

Reputation

☑ Increased concern and/or negative feedback from partners and stakeholders

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

Technology

☑ Dependency on water-intensive energy sources

☑ Transition to lower emissions technology and products

Liability

☑ Non-compliance with regulations and legislation

(2.2.2.16) Partners and stakeholders considered

Select all that apply

☑ Employees

☑ Investors

☑ Regulators

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

Select from:

☑ Yes

(2.2.2.18) Further details of process

At Akenerji, the Board of Directors has ultimate responsibility for overseeing risk management and internal control systems. The Corporate Risk Management Procedure provides the framework for identifying, assessing, prioritizing and monitoring risks, while the risk inventory serves as a key monitoring tool. Risk owners and relevant actions are assigned for identified risks, and high-scoring risks are monitored at Board level. Climate- and sustainability-related risks and opportunities are overseen by the Sustainability Committee with technical support from the Strategic Planning and Risk Management Department. Akenerji assesses climate-

related dependencies, impacts, risks and opportunities through a structured inventory process that considers potential effects on operations, financial performance, investment decisions and long-term value creation. A long-list approach is used to evaluate likelihood, potential impact, capacity to generate financial consequences and relationship with Akenerji's strategic priorities. Risks and opportunities expected to have a reasonable effect on the Company's financial position, operations, operational continuity or strategic objectives are prioritized, while items with limited likelihood or low impact are excluded from further assessment. The assessment considers multiple time horizons aligned with Akenerji's strategic planning and investment cycles. This enables the Company to consider near-term regulatory and market developments alongside longer-term transition and physical climate effects across its valuechain (upstream, own ops and downstream). The time horizon assigned to each risk or opportunity informs its prioritization, financial impact assessment, monitoring and related actions. Stakeholder views on transition risks and acute and chronic physical risks informed the development of an inventory covering climate-related dependencies, impacts, risks and opportunities in alignment with TCFD and ISSB. During the 2025 workshops, participants assessed each risk and opportunity based on its likelihood, potential impact, capacity to generate financial consequences and relationship with Akenerji's strategic priorities. A joint scoring exercise was conducted to determine which risks and opportunities would be included in the financial impact assessment. Scenario analysis supports the assessment of physical climate risks and their potential financial effects. For drought risk, Akenerji uses the IPCC AR6 RCP2.6 and RCP8.5 pathways for the 2030 and 2050 reference years, together with corresponding NGFS narratives covering orderly transition, delayed transition and current policies conditions. Scenario-specific precipitation reduction assumptions are used to estimate potential changes in hydroelectric generation and the associated financial effects. The analysis draws on historical generation and precipitation data and Akenerji's projected electricity prices and system usage costs. Following the review conducted in 2025, Akenerji updated its climate-related risk and opportunity inventory. The inventory supports prioritization and monitoring and provides input to strategic planning, investment planning and risk management. Through this approach, Akenerji aims to strengthen its operational and financial resilience and support its transition toward a low-carbon energy system.

Row 2

(2.2.2.1) Environmental issue

Select all that apply

☑ Water

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

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☑ Direct operations

☑ Upstream value chain

(2.2.2.4) Coverage

Select from:

☑ Full

(2.2.2.5) Supplier tiers covered

Select all that apply

☑ Tier 1 suppliers

(2.2.2.7) Type of assessment

Select from:

☑ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

☑ Annually

(2.2.2.9) Time horizons covered

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(2.2.2.10) Integration of risk management process

Select from:

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

(2.2.2.11) Location-specificity used

Select all that apply

☑ Site-specific

☑ Local

☑ National

(2.2.2.12) Tools and methods used

Commercially/publicly available tools

☑ LEAP (Locate, Evaluate, Assess and Prepare) approach, TNFD

☑ WRI Aqueduct

☑ WWF Water Risk Filter

Enterprise Risk Management

☑ Enterprise Risk Management

International methodologies and standards

☑ Environmental Impact Assessment

☑ ISO 14001 Environmental Management Systems

☑ ISO 14046 Environmental Management – Water footprint

Databases

☑ Regional government databases, please specify :TUIK (TurkStat), MGM (Turkish Meteorological Service)

Other

☑ Scenario analysis

☑ Desk-based research

☑ External consultants

☑ Materiality assessment

☑ Internal company methods

☑ Partner and stakeholder consultation/analysis

(2.2.2.15) Risk types and criteria considered

Acute physical

☑ Drought

☑ Wildfires

Chronic physical

☑ Water stress

☑ Soil degradation

☑ Declining water quality

☑ Increased ecosystem vulnerability

☑ Water quality at a basin/catchment level

☑ Increased severity of extreme weather events

☑ Water availability at a basin/catchment level

☑ Seasonal supply variability/interannual variability

☑ Changing temperature (air, freshwater, marine water)

☑ Changing precipitation patterns and types (rain, hail, snow/ice)

Policy

☑ Increased difficulty in obtaining operations permits

☑ Increased difficulty in obtaining water withdrawals permits

☑ Poor coordination between regulatory bodies

Market

☑ Uncertainty in market signals

Reputation

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

Technology

☑ Dependency on water-intensive energy sources

Liability

☑ Non-compliance with regulations and legislation

(2.2.2.16) Partners and stakeholders considered

Select all that apply

☑ Employees

☑ Investors

☑ Regulators

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

Select from:

☑ No

(2.2.2.18) Further details of process

At Akenerji, water is considered both an operational input and a natural resource of increasing strategic importance due to climate change. In 2025, we continued to review and strengthen our water management approach by considering climate-related physical risks, ecosystem sensitivities and operational continuity requirements. Although water consumption was not identified among the highest-priority topics in the double materiality assessment, water-related issues remain an important area to manage across our generation portfolio. Our operations use seawater, groundwater and municipal water, depending on facility requirements. We use the WRI Aqueduct Water Risk Atlas and WWF Water Risk Filter to analyze physical water risks associated with water-dependent generation facilities. These tools are considered together with facility-level operational data, historical generation and precipitation data, water withdrawal and discharge information, and climate scenarios to assess water-related dependencies, impacts and risks. Our natural gas combined cycle operations depend on seawater for process needs. Seawater is treated through reverse osmosis and used in high-pressure steam systems and process cooling. Accordingly, seawater availability and quality, discharge conditions and potential effects on marine ecosystems are considered in our water management approach. In 2025, seawater withdrawal amounted to 15,094,464 m³. Water withdrawal and discharge data are monitored, and wastewater is managed in accordance with applicable environmental legislation. Hydroelectric generation depends directly on the availability and continuity of river flows. Reduced precipitation, drought and changes in hydrological conditions may decrease generation volumes and affect operational and financial performance. In 2025, Akenerji assessed drought risk using historical generation and precipitation data and climate scenarios. The analysis applies IPCC AR6 RCP2.6 and RCP8.5 pathways for the 2030 and 2050 reference years, together with corresponding NGFS narratives. Scenario-specific precipitation reduction assumptions are used to estimate potential changes in hydroelectric generation and associated financial effects. Water-related risks are also considered through generation planning, monitoring and operational risk management processes. Wind-based electricity generation does not directly depend on water as a generation input and therefore requires limited water compared with thermal and hydroelectric generation. Nevertheless, groundwater use and potential environmental effects associated with facility operations are monitored. In 2025, water withdrawal at the Ayyıldız WPP amounted to 66 m³. Wind power contributes to portfolio diversification by providing renewable electricity generation that is not dependent on river flows or cooling water. In 2025, no environmental incidents, non-compliance cases or accidents related to water resource management were reported. Akenerji continued to comply with applicable requirements for protecting aquatic ecosystems and to assess water-related risks and opportunities under climate scenarios. Water withdrawal, consumption and discharge indicators are monitored at facility level and incorporated into environmental performance reporting. Through this approach, water-related considerations are linked to risk management, operational planning and efforts to strengthen the resilience of the generation portfolio.

Row 3

(2.2.2.1) Environmental issue

Select all that apply

☑ Biodiversity

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

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☑ Direct operations

☑ Upstream value chain

(2.2.2.4) Coverage

Select from:

☑ Full

(2.2.2.5) Supplier tiers covered

Select all that apply

☑ Tier 1 suppliers

(2.2.2.7) Type of assessment

Select from:

☑ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

☑ Annually

(2.2.2.9) Time horizons covered

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(2.2.2.10) Integration of risk management process

Select from:

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

(2.2.2.11) Location-specificity used

Select all that apply

☑ Site-specific

☑ Local

☑ National

(2.2.2.12) Tools and methods used

Commercially/publicly available tools

☑ ENCORE

☑ LEAP (Locate, Evaluate, Assess and Prepare) approach, TNFD

Enterprise Risk Management

☑ Enterprise Risk Management

International methodologies and standards

☑ Environmental Impact Assessment

☑ ISO 14001 Environmental Management Systems

Databases

☑ Regional government databases, please specify :TUIK (TurkStat), MGM (Turkish Meteorological Service)

Other

☑ Scenario analysis

☑ Desk-based research

☑ External consultants

☑ Materiality assessment

☑ Internal company methods

☑ Partner and stakeholder consultation/analysis

(2.2.2.15) Risk types and criteria considered

Acute physical

☑ Drought

Chronic physical

☑ Change in land/freshwater/ocean use

☑ Changing temperature (air, freshwater, marine water)

☑ Increased ecosystem vulnerability

☑ Soil erosion

☑ Water availability at a basin/catchment level

Policy

☑ Poor enforcement of environmental regulation

Reputation

☑ Increased concern and/or negative feedback from partners and stakeholders

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

Technology

☑ Lack of access to data or monitoring systems

Liability

☑ Non-compliance with regulations and legislation

(2.2.2.16) Partners and stakeholders considered

Select all that apply

☑ Employees

☑ Investors

☑ Regulators

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

Select from:

☑ No

(2.2.2.18) Further details of process

At Akenerji, biodiversity conservation and the management of ecological impacts are integral to our environmental responsibility and corporate risk management approach. Due to the geographic and technological diversity of our generation portfolio, dependencies, impacts, risks and opportunities vary by facility and ecosystem. We assess relevant ecological considerations from investment planning through operation. Environmental monitoring at all power plants begins in alignment with Environmental Impact Assessment (EIA) processes and continues during operation in accordance with applicable legislation. Relevant risks and opportunities are reviewed, and preventive, monitoring and corrective actions are planned where necessary. Ayyıldız WPP Dependency: Electricity generation does not directly depend on biodiversity. However, ecosystem condition, habitat integrity, bird and bat presence, and flight routes are relevant to responsible operation. Impact: Turbine operation may create collision risks for birds and bats, while construction or maintenance activities may cause temporary habitat disturbance. Risk assessment and management: EIA documentation and regional biodiversity risk information are considered when assessing habitat change, bird movements, flora and fauna. Environmental monitoring continues during operation. Opportunity: Continued monitoring and consideration of biodiversity in operational and investment decisions support early identification of emerging risks and responsible renewable generation. Erzin NGCCPP Dependency: Operations are linked to marine and

coastal ecosystem conditions through the use of seawater in process and cooling systems. Seawater availability and quality are therefore relevant operational considerations. Impact: Seawater intake and discharge may affect marine ecosystems through changes in temperature or water characteristics if not appropriately managed. Risk assessment and management: Seawater is treated through reverse osmosis and used in high-pressure steam and process cooling systems. Water withdrawal and discharge are monitored, wastewater is managed in accordance with environmental legislation, and potential effects on aquatic ecosystems are addressed through environmental monitoring and compliance processes. Opportunity: Monitoring seawater use and discharge, maintaining treatment processes and improving resource efficiency can support operational performance and reduce biodiversity-related pressures. Hydroelectric operations Dependency: Hydroelectric generation depends on river systems and associated ecosystem services. River-flow continuity is important for generation and aquatic habitats. Impact and risk: Dams and water regulation may affect habitats, fish movement and aquatic ecosystem continuity. At Akenerji's hydroelectric facilities, fish-passage functionality is monitored and legally required environmental flow releases are regularly tracked. Opportunity: Facility-level monitoring and compliance with environmental-flow requirements support aquatic ecosystem continuity and operational resilience. Through this facility-specific approach, Akenerji integrates biodiversity considerations into environmental monitoring and risk management. The process supports identification of dependencies and impacts, monitoring of operational risks, and planning of actions consistent with EIA commitments and applicable legislation.
[Add row]

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

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

Select from:
☑ Yes

(2.2.7.2) Description of how interconnections are assessed

At Akenerji, interconnections between environmental dependencies, impacts, risks and opportunities are assessed through an integrated process linking environmental management, Enterprise Risk Management, strategy and investment planning. The process is informed by TSRS 1 and TSRS 2, TCFD guidance, ISSB industry-based guidance, Akenerji's TNFD-related assessment and reporting work, and its ISO 14001 Environmental Management System. It considers how Akenerji depends on natural resources and ecosystem services, how its activities may affect them, and how these relationships may create operational, financial or strategic risks and opportunities. Climate, water and biodiversity are considered through connected assessment processes, with results considered at facility and portfolio levels. Facility characteristics, EIA commitments, operational and environmental monitoring, stakeholder input, climate indicators and external tools provide assessment inputs. Matters are evaluated according to likelihood, potential impact, time horizon, financial consequences and relevance to strategic priorities. Risk owners and actions are assigned based on significance. Water illustrates these interconnections. Hydroelectric generation depends on river flows and associated aquatic ecosystems. Reduced precipitation and drought may lower generation and affect revenue and EBITDA, while water regulation may affect habitats, fish movement and ecosystem continuity. These relationships are assessed using WRI Aqueduct, WWF Water Risk Filter, operational, generation and precipitation data, and RCP2.6 and RCP8.5 scenario analysis. The results support estimates of potential changes in generation and related financial effects, generation planning, environmental-flow monitoring and fish-passage controls. Interconnections are also assessed across the generation portfolio. Wind generation has limited direct operational water dependency and supports resilience under water-stressed conditions, while potential effects on birds, bats and habitats are addressed through EIA and environmental monitoring. Natural gas combined-cycle operations depend on seawater for process and cooling requirements, linking operational performance to

seawater availability, quality, treatment and discharge conditions and marine ecosystems. Akenerji also considers potential synergies and trade-offs. Renewable generation and efficiency measures may support emissions reduction and resource resilience, while individual projects may create location-specific effects on habitats or water systems. These interactions are addressed through EIA commitments, monitoring, risk assessment and preventive or corrective actions. No risks or opportunities requiring trade-offs were identified during the 2025 reporting period. Results are incorporated into Enterprise Risk Management, operational, strategic, financial and investment planning, and portfolio-resilience assessments.
[Fixed row]

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

(2.3.1) Identification of priority locations

Select from:

☑ Yes, we have identified priority locations

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

Select all that apply

☑ Direct operations

(2.3.3) Types of priority locations identified

Sensitive locations

☑ Areas important for biodiversity

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

☑ Areas of importance for ecosystem service provision

Locations with substantive dependencies, impacts, risks, and/or opportunities

☑ Locations with substantive dependencies, impacts, risks, and/or opportunities relating to water

☑ Locations with substantive dependencies, impacts, risks, and/or opportunities relating to biodiversity

(2.3.4) Description of process to identify priority locations

We identify priority locations across our direct operations and upstream value chain by combining environmental dependency, impact and risk analyses. Within our direct operations, we assess our hydroelectric, wind and natural gas combined-cycle power plants separately, considering each technology's dependence on natural resources and ecosystem services, potential environmental impacts, exposure to physical climate and nature-related risks, and the possible operational and financial significance of these factors. We use ENCORE to identify dependencies on natural capital and ecosystem services. For our hydroelectric plants, we consider water availability, hydrological cycles, water quality, aquatic ecosystems and soil stability. For our natural gas combined-cycle operations, we assess dependencies related to seawater used for process and cooling needs, climate conditions affecting efficiency and marine ecosystem conditions. For our wind operations, we consider wind availability, climate conditions, land use, habitats and potential interactions with birds and bats. We complement this analysis with location-specific screening using the WRI Aqueduct Water Risk Atlas, WWF Water Risk Filter and WWF Biodiversity Risk Filter. These tools support our assessment of water stress, water availability and quality, drought exposure, climate vulnerabilities, ecosystem condition and biodiversity sensitivity around each facility. We consider these results together with facility-specific EIA documentation, operational and environmental monitoring data, water withdrawal and discharge information, generation and precipitation data, regulatory requirements and stakeholder input. We prioritize locations based on the significance of identified dependencies and impacts, the likelihood and magnitude of risks, ecosystem sensitivity and potential operational and financial consequences. Accordingly, we give greater attention to facilities with higher exposure to drought, changing river flows, water stress, marine ecosystem interactions or biodiversity sensitivities. Assessment results inform environmental risk prioritization, assignment of responsible functions, preventive, monitoring and corrective actions, and operational and investment planning. Relevant operational units and sustainability representatives implement facility-level practices, while measurement and reporting are monitored at corporate level. Through this integrated process, we consider water-, climate- and biodiversity-related dependencies, impacts and risks together and incorporate location-specific findings into environmental management, Enterprise Risk Management and strategic planning.

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

Select from:

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

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

Akenerji_CDP26_Priority Locations.xlsx
[Fixed row]

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

Risks

(2.4.1) Type of definition

Select all that apply

☑ Qualitative

☑ Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:

☑ EBITDA

(2.4.3) Change to indicator

Select from:

☑ % decrease

(2.4.4) % change to indicator

Select from:

☑ 1-10

(2.4.6) Metrics considered in definition

Select all that apply

☑ Frequency of effect occurring

☑ Time horizon over which the effect occurs

☑ Likelihood of effect occurring

(2.4.7) Application of definition

We define and assess substantive risk effects in accordance with our Enterprise Risk Management Procedure and the methodology disclosed in Akenerji's 2025 TSRS-compliant Sustainability Report. Each risk is evaluated based on its likelihood and frequency of occurrence, potential impact, expected time horizon, capacity to generate financial consequences and relevance to our strategic priorities. Likelihood and impact are classified from very low to very high using a 5×5 matrix. We assess both gross risk before controls and net risk after considering the effectiveness of existing controls, with net risk scores serving as the principal basis for prioritization. Financial significance is assessed using EBITDA-based thresholds. A one-off effect equal to or exceeding 7% of EBITDA or a recurring effect equal to or exceeding 4% of EBITDA is classified as very high. Lower effects are classified incrementally according to the applicable financial-impact scale. One-off thresholds are applied primarily to acute effects, while recurring thresholds are applied to chronic or continuing effects. Depending on the nature of the risk, the assessment considers potential effects on revenue, generation volumes, operating costs, investment requirements, asset values, regulatory penalties and indirect reputation-related losses. Qualitative consequences for operational continuity, regulatory compliance, stakeholder relationships, reputation, strategic objectives and long-term value creation are also considered. Classification as substantive is not limited to the highest financial-impact category. Risks may be considered substantive based on

their combined financial and qualitative consequences, likelihood, time horizon, potential effect on operational continuity and relevance to strategic objectives. Risks with high net scores, significant financial effects or strategic relevance are prioritized. The results determine risk ownership, action plans, monitoring requirements and inclusion in financial-impact assessment, strategic planning and investment planning. High-scoring risks are monitored at Board level.

Opportunities

(2.4.1) Type of definition

Select all that apply

☑ Qualitative

☑ Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:

☑ EBITDA

(2.4.3) Change to indicator

Select from:

☑ % increase

(2.4.4) % change to indicator

Select from:

☑ 1-10

(2.4.6) Metrics considered in definition

Select all that apply

☑ Frequency of effect occurring

☑ Time horizon over which the effect occurs

☑ Likelihood of effect occurring

(2.4.7) Application of definition

We define and assess substantive opportunity effects using the same structured likelihood and impact methodology applied to risks, adapted to reflect potential positive outcomes. Each opportunity is evaluated based on its likelihood and frequency of occurrence, potential impact, expected time horizon, capacity to generate financial consequences and relevance to our strategic priorities. Positive financial effects are assessed using the EBITDA-based thresholds defined in our Enterprise Risk Management Procedure. A one-off positive effect equal to or exceeding 7% of EBITDA or a recurring positive effect equal to or exceeding 4% of EBITDA is classified as very high. Lower positive effects are classified incrementally according to the applicable financial-impact scale. Depending on the opportunity, the assessment considers potential revenue growth, cost savings, efficiency improvements, avoided costs, asset optimization, access to new markets or financing, and benefits associated with renewable energy and the low-carbon transition. Qualitative benefits may include stronger regulatory readiness, improved resource efficiency, enhanced stakeholder confidence, supply security, operational resilience and positive reputational effects. Classification as substantive is not limited to the highest financial-impact category. Opportunities may be considered substantive based on their combined financial and qualitative benefits, likelihood, time horizon and relevance to operational resilience, investment decisions, strategic objectives or long-term value creation. Relevant functions jointly assess and prioritize opportunities to determine which items should proceed to financial-impact assessment. The results are used to assign owners, define actions and monitoring requirements, and integrate prioritized opportunities into strategic and investment planning.
[Add row]

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

(2.5.1) Identification and classification of potential water pollutants

Select from:

☑ Yes, we identify and classify our potential water pollutants

(2.5.2) Details of policies and processes in place to identify and classify potential water pollutants

Akenerji identifies and classifies potential water pollutants through facility-level environmental and wastewater-management processes designed to protect water ecosystems and human health, prevent pollution and maintain regulatory compliance. The process is aligned with the ISO 14001 Environmental Management System and applicable national requirements, including the Environmental Permit and Licence Regulation, Water Pollution Control Regulation and Environmental Impact Assessment requirements. Potential pollutants and water-quality indicators are identified according to the wastewater source, operational activity, substances handled, discharge or transfer route, receiving environment and applicable permit conditions. Risk assessments and environmental-impact assessments support evaluation of potential effects. Depending on the wastewater stream and permit requirements, the assessment may cover heavy metals such as nickel, zinc, mercury, lead and chromium, organic pollutants and microbiological contaminants such as coliform bacteria, together with monitoring parameters including pH as a water-quality parameter and temperature. At Erzin NGCCPP, process wastewater is managed through the on-site wastewater-treatment system operated by qualified personnel. Potential pollutants are identified based on the characteristics of wastewater generated by operational and treatment processes and are classified using the parameters specified in the facility's environmental permit and discharge requirements. Treated wastewater is regularly monitored against applicable discharge criteria. Data are also transmitted through the remote wastewater-monitoring station, supporting continuous oversight of the parameters covered by the system and

timely identification of relevant deviations. Monitoring is supplemented by inspections of wastewater infrastructure and discharge lines. At other power plants, domestic wastewater is collected and transferred through applicable facility-level systems. Where off-site transfer is required, licensed service providers transport the wastewater for treatment or disposal in accordance with legal requirements. Through source identification, permit-based classification, treatment, monitoring, infrastructure controls and licensed transfer, Akenerji seeks to identify and manage potential deviations before discharge or disposal. No wastewater-related environmental incident or regulatory non-compliance was reported in 2025.
[Fixed row]

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

Row 1

(2.5.1.1) Water pollutant category

Select from:
☑ Oil

(2.5.1.2) Description of water pollutant and potential impacts

At Erzin NGCCPP, potential oil pollutants are mainly associated with lubricants, hydraulic fluids and other oil-containing materials used during the operation and maintenance of machinery and equipment. Oil may enter wastewater or the receiving environment through equipment failure, leakage, improper handling or accidental spills. If released into water, oil may spread across the surface or disperse into the surrounding water, reducing water quality and potentially affecting aquatic organisms and habitats. Depending on the type and quantity released, oil contamination may disrupt ecosystem functions, persist in the receiving environment and create indirect risks to human health. We therefore classify oil as a potential water pollutant requiring preventive controls, monitoring and emergency response measures within our direct operations.

(2.5.1.3) Value chain stage

Select all that apply
☑ Direct operations

(2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply
☑ Industrial and chemical accidents prevention, preparedness, and response

☑ Discharge treatment using sector-specific processes

☑ Upgrading of process equipment/methods

☑ Other, please specify :Compliance with national legislation, storage, disposal/recovery methods Compliance with Internal Procedures (The CVR/PR 002 - Environmental Accident and Complaint Reporting Procedure)

(2.5.1.5) Indicators for measuring and evaluating the success of the procedure

Select all that apply

☑ Compliance with discharge permits / regulatory limits

(2.5.1.6) Please explain

At Erzin NGCCPP, adverse impacts of oil pollutants are managed through spill prevention, controlled waste oil handling, wastewater treatment, emergency response, and compliance with national legislation and CVR/PR 002 - Environmental Accident and Complaint Reporting Procedure. Waste oil is reused where feasible. Remaining oil is stored under controlled conditions and transferred to licensed recycling companies, reducing risks to soil and water. Water that may contain oil is directed to the on-site industrial wastewater treatment plant and treated using oil-water separators before discharge in line with the facility's permit and discharge limits. Preventive controls include maintenance and inspections of equipment, oil storage areas, wastewater infrastructure and discharge lines, supported by emergency drills. Under CVR/PR 002, incidents are classified as Category 1, 2 or 3 based on significance, determining reporting, escalation and response requirements. Effectiveness is evaluated through wastewater monitoring, inspections, audits, incident and complaint records, drill results, waste oil transfer records and compliance assessments. Data are transmitted through the Ministry of Environment, Urbanisation and Climate Change's Continuous Wastewater Monitoring System (SAIS), enabling real-time monitoring. Oil-related incidents, waste oil volumes, findings, corrective actions and discharge compliance are reviewed to support continuous improvement. These controls continued in 2025.

Row 2

(2.5.1.1) Water pollutant category

Select from:

☑ Pathogens

(2.5.1.2) Description of water pollutant and potential impacts

At Erzin NGCCPP, potential pathogens originate primarily from domestic wastewater generated. These pollutants include fecal coliform bacteria, viruses and other microorganisms. Domestic wastewater is managed together with other wastewater streams generated at the facility, including process and cooling-related wastewater and reverse osmosis discharge, through the on-site wastewater treatment system. If pathogens are not effectively removed through treatment and controlled wastewater management, they can enter the receiving environment, reduce water quality and create risks for aquatic ecosystems and human health. Exposure to

pathogen-contaminated water can contribute to the transmission of waterborne diseases, while elevated microorganism levels can disturb the ecological balance of receiving waters. Potential impacts are particularly relevant where receiving water resources support human activities or ecosystem services. We therefore classify pathogens as potential water pollutants requiring treatment, regular parameter monitoring and controlled discharge. The treatment plant is operated by qualified technical personnel, treated wastewater parameters are regularly monitored, and discharge data are monitored in real time by the Ministry of Environment, Urbanization and Climate Change.

(2.5.1.3) Value chain stage

Select all that apply

☑ Direct operations

(2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply

☑ Industrial and chemical accidents prevention, preparedness, and response

☑ Discharge treatment using sector-specific processes

☑ Other, please specify :Compliance with national legislation and discharge methods Compliance with Internal Procedures (The CVR/PR 002 - Environmental Accident and Complaint Reporting Procedure)

(2.5.1.5) Indicators for measuring and evaluating the success of the procedure

Select all that apply

☑ Compliance with discharge permits / regulatory limits

(2.5.1.6) Please explain

At Erzin NGCCPP, we minimize pathogen-related impacts by treating domestic wastewater in the on-site wastewater treatment plant before discharge. Qualified technical personnel operate the plant, and effluent quality is regularly monitored for fecal coliforms and other microbiological indicators in accordance with national legislation and discharge requirements. Treatment effectiveness is evaluated through pathogen-reduction performance, compliance with discharge criteria, monitoring results and real-time discharge monitoring by the Ministry of Environment, Urbanization and Climate Change. In the event of a treatment-system failure, spill, accident, complaint or suspected non-compliance, we apply the CVR/PR 002 Environmental Accident and Complaint Reporting Procedure. The procedure classifies incidents into three levels and determines the reporting and response process. Where required, immediate shutdown procedures and backup treatment systems are activated to prevent the release of untreated wastewater. We evaluate the success of these controls through monitoring and audit results, fecal-coliform tests, pathogen-reduction rates, discharge-permit compliance, and records of incidents, corrective actions and non-compliance. In 2025, no environmental incident, accident or regulatory non-compliance related to wastewater management was reported. Together, treatment, monitoring, emergency controls and internal reporting minimize risks to aquatic ecosystems and human health.

Row 3

(2.5.1.1) Water pollutant category

Select from:

☑ Inorganic pollutants

(2.5.1.2) Description of water pollutant and potential impacts

Potential inorganic pollutants are associated with industrial wastewater generated and include heavy metals such as nickel (Ni), zinc (Zn), mercury (Hg), lead (Pb), chromium (Cr). If these substances are not effectively treated and controlled, they can enter the receiving environment and reduce water quality. Heavy metals can be toxic to aquatic organisms even at low concentrations, persist in water and sediments, and accumulate in living organisms over time. Prolonged exposure can disrupt aquatic ecosystems, reduce biodiversity and affect ecosystem functions. Contamination of water resources and the aquatic food chain can also create risks to human health. We therefore classify inorganic pollutants as potential water pollutants requiring treatment, regular parameter monitoring and controlled discharge. Wastewater generated at Erzin NGCCPP is managed through the on-site wastewater treatment plant operated by qualified technical personnel, and treated wastewater parameters are regularly monitored in accordance with applicable regulatory requirements.

(2.5.1.3) Value chain stage

Select all that apply

☑ Direct operations

(2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply

☑ Industrial and chemical accidents prevention, preparedness, and response

☑ Discharge treatment using sector-specific processes

☑ Other, please specify :Compliance with national legislation and discharge methods Compliance with Internal Procedures (The CVR/PR 002 - Environmental Accident and Complaint Reporting Procedure)

(2.5.1.5) Indicators for measuring and evaluating the success of the procedure

Select all that apply

☑ Compliance with discharge permits / regulatory limits

(2.5.1.6) Please explain

At Erzin NGCCPP, we minimize impacts from inorganic pollutants, including lead, mercury, chromium, nickel and zinc, through wastewater treatment, monitoring, infrastructure controls and waste management. Process wastewater is managed through the on-site treatment plant operated by qualified personnel. Pollutant concentrations are monitored against legislation and discharge requirements, while discharge data are monitored in real time by the Ministry of Environment, Urbanization and Climate Change. We conduct regular audits and infrastructure assessments to identify and mitigate potential risks, including leaks or spills that could cause environmental contamination. Materials and wastes containing inorganic pollutants are segregated at source and managed through controlled storage, recovery or disposal in line with legal requirements. In the event of a spill, accident, complaint or suspected non-compliance, we apply the CVR/PR 002 Environmental Accident and Complaint Reporting Procedure to record, classify and manage the event and initiate corrective action. We evaluate effectiveness through laboratory results, discharge compliance, audit and inspection findings, waste records, and tracking of incidents and corrective actions. In 2025, no environmental incident, accident or regulatory non-compliance related to wastewater management was reported. Together, these controls reduce the risk of heavy metals entering receiving waters and affecting aquatic ecosystems or human health.

Row 4

(2.5.1.1) Water pollutant category

Select from:

☑ Other nutrients and oxygen demanding pollutants

(2.5.1.2) Description of water pollutant and potential impacts

At Erzin NGCCPP, potential oxygen-demanding pollutants are associated primarily with organic matter in domestic and process wastewater. Chemical Oxygen Demand (COD) and Biochemical Oxygen Demand (BOD) are used as indicators of the amount of oxidizable and biodegradable organic matter present in wastewater. If wastewater containing elevated organic matter is not adequately treated and controlled, its decomposition can consume dissolved oxygen in the receiving environment. Reduced oxygen levels can affect aquatic organisms, disrupt ecosystem functions and deteriorate overall water quality. Organic matter and nutrients can also contribute to excessive algal growth and further oxygen depletion, increasing pressure on aquatic ecosystems. Where affected water resources support human activities, agriculture or ecosystem services, declining water quality can create additional environmental and human health risks. We therefore classify COD, BOD and related organic and nutrient loads as potential water pollutants requiring treatment, regular parameter monitoring and controlled discharge. Wastewater generated at Erzin NGCCPP is managed through the on-site wastewater treatment plant operated by qualified technical personnel, and treated wastewater parameters are regularly monitored in accordance with applicable regulatory requirements.

(2.5.1.3) Value chain stage

Select all that apply

☑ Direct operations

(2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply

☑ Industrial and chemical accidents prevention, preparedness, and response

☑ Discharge treatment using sector-specific processes

☑ Other, please specify :Compliance with national legislation and discharge methods Compliance with Internal Procedures (The CVR/PR 002 - Environmental Accident and Complaint Reporting Procedure)

(2.5.1.5) Indicators for measuring and evaluating the success of the procedure

Select all that apply

☑ Compliance with discharge permits / regulatory limits

(2.5.1.6) Please explain

At Erzin NGCCPP and our hydroelectric power plants, impacts from nutrients and oxygen-demanding pollutants are managed through wastewater treatment, controlled storage and disposal, compliance with national legislation and permitted discharge methods, and CVR/PR 002 - Environmental Accident and Complaint Reporting Procedure. These controls reduce organic loads and help prevent oxygen depletion in receiving waters. Wastewater is treated before discharge using facility-specific processes. COD and BOD are monitored against permit limits to verify performance. Wastewater requiring disposal or recovery is stored under controlled conditions and managed through compliant channels. Controls include wastewater infrastructure and discharge-line inspections and environmental audits. Under CVR/PR 002, incidents affecting wastewater quality are classified by significance, triggering reporting, escalation, response and corrective actions. Effectiveness is evaluated through monitoring, audits and key performance indicators, including COD and BOD reduction rates, compliance with discharge permits and the number of reported incidents. At Erzin NGCCPP, data are transmitted through the Ministry of Environment, Urbanisation and Climate Change's Continuous Wastewater Monitoring System (SAIS), supporting timely identification of deviations. Findings and corrective actions are reviewed for continuous improvement. These controls continued in 2025 to protect water ecosystems and human health.
[Add row]

C3. Disclosure of risks and opportunities

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

	Environmental risks identified
Climate change	*Select from:* ☑ Yes, both in direct operations and upstream/downstream value chain
Water	*Select from:* ☑ Yes, both in direct operations and upstream/downstream value chain

[Fixed row]

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

Climate change

(3.1.1.1) Risk identifier

Select from:
☑ Risk1

(3.1.1.3) Risk types and primary environmental risk driver

Policy
☑ Carbon pricing mechanisms

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ Türkiye

(3.1.1.9) Organization-specific description of risk

The anticipated implementation of the Turkish Emissions Trading System (ETS) creates a transition risk for Akenerji across the short, medium and long term. The risk is concentrated at Erzin NGCCPP, Akenerji's principal natural gas asset with an installed capacity of 904 MW, representing approximately 74% of the Company's generation portfolio and the predominant source of its Scope 1 emissions. The ETS is expected to enter a pilot phase in 2027, with price formation becoming clearer thereafter. In the medium term, allowance prices are expected to remain relatively low, while potential free allocation, the pass-through of carbon costs to electricity market prices and Erzin NGCCPP's emissions factor, which is below the national average, may help keep the risk manageable. In the long term, if free allocation declines and Turkish allowance prices gradually converge toward European carbon market levels, carbon costs may become a recurring and strategic expense, placing pressure on the financial performance, valuation and financing conditions of natural gas-based generation assets. Carbon pricing may also affect electricity market prices, regional trading dynamics, trading margins and portfolio optimization. Akenerji's renewable generation portfolio and Erzin NGCCPP's relative emissions efficiency may partially mitigate this exposure.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased direct costs

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

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

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

Select from:

☑ Very likely

(3.1.1.14) Magnitude

Select from:

☑ High

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

No current-period financial effect related to the Turkish ETS was recognized in 2025 because the system was not operational. In the short term, the expected commencement of the pilot phase in 2027 delays the positive portfolio contribution previously anticipated, creating an estimated annual opportunity cost of approximately 1-2% of EBITDA. In the medium term, Akenerji's scenario analysis indicates that the ETS could provide a positive annual net EBITDA effect of approximately 1-2%. Potential allowance costs at Erzin NGCCPP may be more than offset by the pass-through of carbon costs to electricity market prices, potential free allocation and the plant's emissions factor, which is below the national average. This may support revenue and financial performance, while the precise cash-flow effect will depend on allowance prices, allocation rules and market-price formation. In the long term, if free allocation declines and Turkish allowance prices gradually converge toward European carbon market levels, allowance costs may create sustained pressure on operating expenses, cash flows, asset valuations and financing conditions for natural gas-based generation. Erzin NGCCPP's relative emissions efficiency and Akenerji's renewable generation portfolio may partially mitigate this exposure. A quantified long-term financial estimate has not yet been prepared due to uncertainty regarding future allowance prices and allocation rules.

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

Select from:

☑ Yes

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

196311

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

392623

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

10143590

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

49196431

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

101435903

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

122256120

(3.1.1.25) Explanation of financial effect figure

The financial effect is assessed by time horizon and reported in USD. No ETS-related financial effect was recognized in 2025, so the reporting-year figure is zero. All estimates use Akenerji's 2025 financial and emissions data as the base. In the short term, the effect represents the foregone contribution caused by delayed operationalization of the Turkish ETS. The 2025 TSRS Report estimates this annual opportunity cost at 1%-2% of EBITDA. Applying this range to 2025 EBITDA of TRY 777 million and converting it at the 2025 average rate of TRY 39.58/USD gives USD 196,311-392,623. For the medium term, no official Turkish allowance price, installation benchmark or free-allocation rate was available at the calculation date. The Türkiye ETS Regulation published on 27 August 2026 establishes benchmark-based free allocation, but leaves the applicable benchmarks, sector coefficients and allocation rates to the National Allocation Plan and subsequent Carbon Market Board decisions. The calculation uses Akenerji's 2025 fossil Scope 1 emissions of 1,222,561.2 tCO2 and the 2025 average EU ETS auction price of USD 82.97/tCO2 as the baseline. The EU CBAM/EU ETS phase-out pathway is used solely as a sensitivity reference for declining free allocation, not as a forecast of Turkish rules. Applying an uncovered share of 10% for 2028 gives USD 10,143,590; applying 48.5% for 2030 gives USD 49,196,413. These values form the medium-term annual gross allowance-cost range. For the long term, the calculation assumes that free allocation is fully phased out and Turkish allowance prices converge toward European levels. Applying USD 82.97/tCO2 to the same 2025 emissions base gives a minimum annual gross cost of USD 101,435,903. Applying the upper-bound assumption of USD 100/tCO2 gives a maximum of USD 122,256,120. The medium- and long-term estimates are forward-looking scenarios anchored to Akenerji's 2025 emissions and the 2025 average EU ETS price. Exposure may differ due to changes in generation, fuel use, plant efficiency, verified covered emissions, free-allocation benchmarks and rates, Turkish allowance prices, exchange rates, regulation and electricity-market conditions. The figures are gross allowance-cost exposure before electricity-price pass-through, portfolio effects or other mitigating factors and do not represent the net effect on EBITDA or cash flows. The assumptions will be updated as Akenerji's operations evolve and official Turkish ETS parameters become available.

(3.1.1.26) Primary response to risk

Infrastructure, technology and spending

☑ Increase environment-related capital expenditure

(3.1.1.27) Cost of response to risk

38021

(3.1.1.28) Explanation of cost calculation

The response cost is based on the carbon-emissions-management component of expenditures disclosed in Akenerji's 2025 TSRS-compliant Sustainability Report. Total expenditure incurred in connection with climate targets and applicable legislation amounted to TRY 11,784,402, of which 12.77% related to carbon-emissions management. This corresponds to TRY 1,504,868. Using the 2025 average exchange rate of TRY 39.58/USD, the resulting response cost is approximately USD 38,021. The amount covers carbon-management and compliance activities supporting preparedness for the Turkish ETS, including emissions monitoring, reporting, verification and related management processes. It does not include the full cost of renewable-energy investments unless those investment costs are separately confirmed and allocated to this risk response.

(3.1.1.29) Description of response

Akenerji manages anticipated risk through regulatory preparedness, emissions measurement and verification, operational efficiency, internal carbon pricing and investment in lower-carbon generation. Scope 1 and 2 emissions are calculated annually using a methodology aligned with the GHG Protocol and assessed in accordance with ISO 14064-1. Erzin NGCCPP, the asset expected to fall directly within the scope of the Turkish ETS, monitors, reports and verifies its emissions under national greenhouse gas monitoring, reporting and verification requirements. These processes provide the emissions data needed to assess potential allowance exposure and support future compliance. Developments concerning the Turkish ETS, allowance allocation and prices are monitored within Akenerji's Risk Management framework. Climate-related regulatory risks are assessed annually by the Sustainability Committee in coordination with the Strategic Planning and Risk Department and relevant business units. Scenario analysis considers potential allowance-price trajectories, changes in free allocation and the extent to which carbon costs may be reflected in electricity market prices. Akenerji also uses an internal carbon price of US$20-30/tCO2 in risk and opportunity assessments and decision-making. At the operational level, Akenerji focuses on Erzin NGCCPP's efficiency through its ISO 50001 Energy Management System. In support of lower-carbon generation and reduced exposure to future carbon costs, the Company initiated a 7.79 MWp hybrid solar investment at the Erzin NGCCPP. Feasibility, contract and tender processes were completed in 2025. Together with Akenerji's existing renewable portfolio, these measures support portfolio diversification, limit emissions intensity and strengthen resilience to anticipated costs. The effectiveness of the response is monitored through verified emissions data, energy-performance indicators, regulatory developments, scenario results and progress on investments.

Water

(3.1.1.1) Risk identifier

Select from:

☑ Risk2

(3.1.1.3) Risk types and primary environmental risk driver

Chronic physical

☑ Water stress

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ Türkiye

(3.1.1.7) River basin where the risk occurs

Select all that apply

☑ Other, please specify :Seyhan Basin, Türkiye

(3.1.1.9) Organization-specific description of risk

Akenerji operates seven hydroelectric power plants whose generation depends directly on river flows and precipitation. The assessment focuses on Feke I, Feke II, Gökkaya and Himmetli HEPPs in the Seyhan Basin, which WRI Aqueduct and the WWF Water Risk Filter identify as exposed to significant physical water risks; WRI classifies these facilities as subject to Extremely High Water Stress currently and under 2030 and 2050 projections. These four plants have a combined capacity of 157 MW and represent 12.8% of Akenerji's generation portfolio. The drought risk materialized operationally in 2025 through reduced water availability and lower hydroelectric generation. However, a separate net financial impact was not quantified because reduced hydroelectric output was managed through generation at Erzin NGCCPP, portfolio balancing and electricity-trading activities. Akenerji uses an expanded scenario framework combining IPCC AR6 RCP2.6/SSP1-2.6 with NGFS Below 2°C and IEA NZE, and RCP8.5/SSP5-8.5 with NGFS Current Policies and IEA STEPS. By 2030, precipitation is projected to decline by approximately 3% under the low-emission pathway and 10% under the high-emission pathway, with potential EBITDA effects of 2.4%-3% and 8%-10%, respectively. By 2050, projected declines of 5% and 17% could result in EBITDA effects of 3.5%-4.4% and 12%-15%. Portfolio balancing may partially mitigate these effects but may be constrained during widespread drought.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Change in revenue mix and sources

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

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

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

Select from:

☑ Very likely

(3.1.1.14) Magnitude

Select from:

☑ High

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

Akenerji assesses the financial effects of water stress and drought under low- and high-emission pathways. The analysis focuses on Feke I, Feke II, Gökkaya and Himmetli HEPPs in the Seyhan Basin. WRI Aqueduct and the WWF Water Risk Filter assess location-specific physical water risks, while WRI classifies these facilities as exposed to Extremely High Water Stress. The four plants have a combined capacity of 157 MW and represent 12.8% of Akenerji's generation portfolio. The low-emission pathway combines IPCC AR6 RCP2.6/SSP1-2.6 with NGFS Below 2°C and IEA NZE; the high-emission pathway combines RCP8.5/SSP5-8.5 with NGFS Current Policies and IEA STEPS. By 2030, precipitation is projected to decline by approximately 3% under the low-emission pathway and 10% under the high-emission pathway. Based on Akenerji's precipitation-generation model, lower river flows and hydroelectric generation could reduce EBITDA by approximately 2.4%-3% and 8%-10%, respectively. By 2050, projected precipitation declines of 5% and 17% could result in EBITDA effects of 3.5%-4.4% and 12%-15%, respectively. Effects may include lower generation, reduced revenue and pressure on cash flows and plant valuations. Erzin NGCCPP generation, portfolio balancing, electricity trading and market-price effects may partially mitigate the exposure, but may be insufficient during widespread drought. Estimates may change with future precipitation, generation, electricity prices and portfolio conditions.

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

Select from:

☑ Yes

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

0

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

588934

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

471147

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

1963113

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

687089

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

2944669

(3.1.1.25) Explanation of financial effect figure

The estimates are reported in USD and use Akenerji's 2025 EBITDA as the common financial baseline. Consolidated 2025 EBITDA was TRY 777 million, equivalent to approximately USD 19,631,127 using the 2025 average exchange rate of TRY 39.58/USD. The drought risk materialized operationally in 2025 through reduced water availability and lower hydroelectric generation. However, no separate net financial effect was measured for the reporting year because Erzin NGCCPP generation, portfolio balancing, electricity trading and market-price effects partly compensated for reduced hydroelectric output. For the short term, the range is presented as a sensitivity estimate rather than a measured loss. The minimum is USD 0, reflecting the possibility that precipitation normalizes and portfolio measures

fully offset the effect. The maximum is USD 588,934, equal to 3% of 2025 EBITDA and based on the upper end of the lower-emission pathway used in Akenerji's scenario analysis. This assumption is applied conservatively because the TSRS analysis does not provide a separate short-term percentage estimate. For the medium term, the TSRS scenario analysis estimates an EBITDA effect of 2.4%-3% under RCP2.6/SSP1-2.6 and 8%-10% under RCP8.5/SSP5-8.5 by 2030. Applying the outer bounds of 2.4% and 10% to the 2025 EBITDA baseline gives a minimum of USD 471,147 and a maximum of USD 1,963,113. For the long term, the estimated EBITDA effect is 3.5%-4.4% under RCP2.6/SSP1-2.6 and 12%-15% under RCP8.5/SSP5-8.5 by 2050. Applying the outer bounds of 3.5% and 15% gives a minimum of USD 687,089 and a maximum of USD 2,944,669. The calculations focus on Feke I, Feke II, Gökkaya and Himmetli HEPPs, totaling 157 MW and representing 12.8% of Akenerji's portfolio. The estimates reflect potential net EBITDA effects after considering portfolio-level mitigation, rather than gross revenue losses. They are forward-looking and may change with precipitation, river flows, generation volumes, electricity prices, Erzin NGCCPP availability, trading performance, exchange rates and portfolio conditions. The assumptions will be reviewed as actual operating data and updated climate projections become available.

(3.1.1.26) Primary response to risk

Diversification

☑ Other diversification, please specify :energy mix and hedging

(3.1.1.27) Cost of response to risk

59547

(3.1.1.28) Explanation of cost calculation

Akenerji's capital deployment for environmental monitoring, measurement and continuous-improvement activities amounted to TRY 11,784,402 in 2025, as disclosed in its TSRS reporting. Of this amount, 20%, corresponding to TRY 2,356,880, was spent on water-related monitoring, measurement, operational controls and continuous-improvement activities. This percentage is not a standardized allocation factor or proxy; it reflects the actual share of the capital deployment attributable to water-related matters in 2025. The expenditure supports the management of both water stress and flooding risks across Akenerji's generating assets. As the same activities address both risks, the amount is reported in each relevant risk row as a shared response cost and should not be added across the rows. Using the 2025 average exchange rate of TRY 39.58/USD, the shared cost of response is approximately USD 59,547.

(3.1.1.29) Description of response

Akenerji manages water-stress and drought risk through location-specific screening, scenario analysis, hydrological monitoring, dynamic generation planning and portfolio diversification. WRI Aqueduct and the WWF Water Risk Filter assess facility-level physical water risks. Historical and projected precipitation, river-flow and generation data, weather forecasts and low- and high-emission scenarios support the assessment. The Trading Department regularly monitors river flows, water levels, weather patterns and seasonal changes. Weekly river-flow forecasts inform annual generation plans, which are revised throughout the year as hydrological and market conditions evolve. This enables Akenerji to adjust production and trading strategies, manage deviations from generation forecasts and optimize available assets. During dry periods, reduced precipitation and river flows may lower hydroelectric generation. Akenerji manages this exposure through portfolio balancing, electricity trading and generation from Erzin NGCCPP. Erzin NGCCPP's operational flexibility supports security of supply and may partially compensate for lower

hydroelectric output. During wetter periods, increased hydroelectric generation reduces the need for natural gas-based generation and supports portfolio optimization. These measures may be constrained during widespread or prolonged drought. Akenerji also invests in diversifying its generation assets and increasing lower-water-dependent and hybrid generation capacity. These investments reduce concentration in water-dependent generation and strengthen resilience to hydrological variability. Akenerji also monitors legally required environmental flows and flow-monitoring stations at its hydroelectric facilities. Response effectiveness is evaluated through river-flow and precipitation trends, generation performance, scenario results, portfolio-balancing outcomes and progress on resilience-related investments.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk3

(3.1.1.3) Risk types and primary environmental risk driver

Acute physical

☑ Wildfires

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Upstream value chain

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ Türkiye

(3.1.1.9) Organization-specific description of risk

Climate change is expected to increase conditions conducive to wildfires, creating an acute physical risk for Akenerji's upstream value chain across the short, medium and long term. The exposure is particularly relevant to the access routes, contractors, maintenance providers, emergency services and external infrastructure supporting Akenerji's geographically dispersed HEPP and WPP assets. Higher temperatures, prolonged dry periods, low humidity and wind may increase wildfire frequency and severity around generation sites. Even without direct asset damage, road closures, site evacuations and disruption of electricity or communication infrastructure may prevent contractors from reaching affected facilities, delay maintenance and emergency intervention, and interrupt deliveries of critical equipment

and spare parts. These disruptions may extend plant unavailability, increase emergency logistics, procurement, repair and maintenance costs, and lead to foregone electricity sales, replacement power purchases and higher portfolio balancing costs. Emergency response arrangements, preventive maintenance, access monitoring and coordination with contractors may partially mitigate the exposure.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Disruption in upstream value chain

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

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

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

Select from:

☑ About as likely as not

(3.1.1.14) Magnitude

Select from:

☑ Low

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

Wildfires may restrict access to Akenerji's geographically dispersed HEPP and WPP assets and disrupt the contractors, maintenance providers, emergency services and external infrastructure supporting their operations. Road closures, site evacuations and interruptions affecting electricity or communication infrastructure may delay maintenance, emergency intervention and the delivery of critical equipment and spare parts. The anticipated financial effects include higher emergency logistics, procurement, contractor, maintenance and repair costs. If access restrictions prolong plant unavailability, Akenerji may also experience foregone electricity sales, replacement power procurement costs and higher portfolio balancing expenses. The financial effect is expected to remain low in magnitude but may increase over the medium and long term if hotter and drier conditions increase wildfire frequency, severity and the duration of the wildfire season.

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

Select from:

☑ Yes

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

196311

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

392622

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

196311

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

392622

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

196311

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

392622

(3.1.1.25) Explanation of financial effect figure

The estimates are reported in USD and use Akenerji's 2025 EBITDA as the common financial baseline. Consolidated 2025 EBITDA was TRY 777 million, equivalent to approximately USD 19,631,127 using the 2025 average exchange rate of TRY 39.58/USD. No separate financial effect from wildfire-related disruption was identified or measured for the reporting year; therefore, the reporting-year figure is zero. The forward-looking figures are sensitivity estimates. Akenerji's climate risk assessment assigns wildfire risk a magnitude score of 2 across the short, medium and long term, corresponding to a low one-off financial effect ranging from 1% to below 2% of EBITDA. Applying this range gives a minimum of USD 196,311 and a maximum of USD 392,622 for each time horizon. The estimate covers restricted

site access, contractor and maintenance disruption, delayed emergency intervention, additional logistics, procurement and repair costs, potential generation losses, replacement power purchases and portfolio balancing costs. Actual effects will depend on the location, severity and duration of the event, assets affected, electricity prices and available mitigation measures.

(3.1.1.26) Primary response to risk

Policies and plans

☑ Amend the Business Continuity Plan

(3.1.1.27) Cost of response to risk

11903

(3.1.1.28) Explanation of cost calculation

The cost of response represents Akenerji's annual expenditure on wildfire preparedness and preventive fire-safety measures. In 2025, TRY 471,128.50 was spent on activities including the inspection, maintenance and refilling of fire extinguishers and other emergency-readiness measures. Using the 2025 average exchange rate of TRY 39.58/USD, this corresponds to approximately USD 11,903. Wildfire disruption scenarios are also incorporated into Akenerji's Business Continuity Plan through existing business continuity, emergency management and operational risk-management processes. Existing personnel and systems assess potential access restrictions, contractor and maintenance disruptions, emergency-response needs and impacts on critical infrastructure. The reported amount reflects direct annual fire-preparedness expenditure, while business-continuity planning is conducted through existing internal resources.

(3.1.1.29) Description of response

Akenerji manages wildfire-related disruption risk through its Business Continuity Plan, emergency-response arrangements, operational planning and preventive fire-safety measures. The response addresses potential access restrictions at geographically dispersed HEPP and WPP sites, disruption of contractors and maintenance providers, delays in emergency intervention, and interruptions to critical equipment and spare-part deliveries. Potential effects on switchyards, transmission connections, site access routes and other critical infrastructure are also considered. Business-continuity arrangements support operational coordination, prioritization of critical maintenance, continuity of essential technical services and timely intervention during wildfire events. Akenerji also implements annual fire-preparedness measures, including the inspection, maintenance and refilling of fire extinguishers and other emergency-readiness activities. In 2025, TRY 471,128.50, equivalent to approximately USD 11,903 using the average exchange rate of TRY 39.58/USD, was spent on these measures. Where operational availability is affected, generation schedules, electricity-market positions and portfolio-balancing activities are adjusted accordingly. Wildfire exposure is assessed across the short, medium and long term, and relevant scenarios are incorporated into ongoing risk assessment and operational planning. The effectiveness of the response is monitored through fire-safety inspections, equipment readiness, emergency-planning activities, identified operational disruptions and the continuity of generation and electricity delivery.

Water

(3.1.1.1) Risk identifier

Select from:

☑ Risk4

(3.1.1.3) Risk types and primary environmental risk driver

Acute physical

☑ Flooding (coastal, fluvial, pluvial, groundwater)

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Downstream value chain

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ Türkiye

(3.1.1.7) River basin where the risk occurs

Select all that apply

☑ Other, please specify :Ceyhan Basin, Türkiye

(3.1.1.9) Organization-specific description of risk

Flooding and heavy precipitation create an acute physical water risk for Akenerji's downstream value chain across the short, medium and long term. The exposure is particularly relevant to the external switchyards, substations, transmission connections, access routes and grid infrastructure through which electricity generated by Erzin NGCCPP is delivered to the market. Erzin NGCCPP has an installed capacity of 904 MW, represents approximately 74% of Akenerji's generation portfolio and is located in Hatay within the Ceyhan River basin, where riverine flood risk is classified as high. Intense rainfall, river flooding or surface-water accumulation may temporarily restrict access to or disrupt downstream grid infrastructure, even where the plant remains technically capable of generating electricity. Akenerji may consequently need to curtail generation, revise market nominations or purchase replacement electricity to meet contracted positions. Potential effects include foregone electricity sales, imbalance charges, replacement power purchases and higher portfolio balancing costs. Coordination with grid operators, weather monitoring and business continuity planning support the management of this exposure.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Disruption in production capacity

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

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

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

Select from:

☑ About as likely as not

(3.1.1.14) Magnitude

Select from:

☑ Medium-low

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

Flooding and heavy precipitation may affect site access, switchyards and connected transmission infrastructure required to deliver electricity generated by Erzin NGCCPP to the market. A temporary connection constraint may restrict electricity delivery even where the plant remains technically capable of generating. Akenerji may consequently need to curtail generation, revise market nominations or purchase replacement electricity to meet contracted sales positions. This could reduce electricity sales revenues and increase imbalance charges, replacement power procurement costs and portfolio balancing expenses. The potential effect is expected to be limited in the short term but may increase over the medium and long term if extreme precipitation and flood-related disruption become more severe. Financial performance and cash flows could be affected through lower electricity receipts and higher short-term electricity procurement and balancing payments.

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

Select from:

☑ Yes

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

0

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

196311

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

196311

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

392622

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

196311

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

785245

(3.1.1.25) Explanation of financial effect figure

The estimates are reported in USD and use Akenerji's 2025 EBITDA as the common financial baseline. Consolidated 2025 EBITDA was TRY 777 million, equivalent to approximately USD 19,631,127 using the 2025 average exchange rate of TRY 39.58/USD. No separate financial effect from flood-related disruption to electricity delivery from Erzin NGCCPP was identified or measured in the reporting year; therefore, the reporting-year figure is USD 0. The forward-looking figures represent sensitivity estimates of the potential gross financial effect before mitigation. Akenerji's risk assessment assigns the underlying extreme weather exposure a magnitude score of 1 in the short term, 2 in the medium term and between 2 and 3 in the long term, depending on the emissions scenario. Under Akenerji's one-off financial impact thresholds, these scores correspond to an effect below 1% of EBITDA, from 1% to below 2% of EBITDA and from 1% to below 4% of EBITDA, respectively. Applying these thresholds to the 2025 EBITDA baseline gives a short-term range of USD 0 to USD 196,311, a medium-term range of USD 196,311 to USD 392,622 and a long-term range of USD 196,311 to USD 785,245. The figures reflect potential foregone electricity sales, imbalance charges, replacement power purchases and portfolio balancing costs resulting from flood-related disruption to switchyards and connected transmission infrastructure.

(3.1.1.26) Primary response to risk

Policies and plans

☑ Amend the Business Continuity Plan

(3.1.1.27) Cost of response to risk

59547

(3.1.1.28) Explanation of cost calculation

Akenerji's existing Business Continuity Plan addresses flood-related disruptions that may affect electricity delivery from Erzin NGCCPP. Relevant scenarios and response arrangements are regularly reviewed for potential impacts on site access, switchyards, transmission connections, market nominations and portfolio balancing. These activities are carried out by existing business continuity, emergency management, electricity trading and operational risk management teams using established systems. The reported USD 59,547 represents Akenerji's shared 2025 expenditure on water-related monitoring, operational controls and continuous improvement, which supports the management of water stress and flood risks. It is not a separate or additional cost for this risk and should not be aggregated with the same amount reported in other water-risk rows.

(3.1.1.29) Description of response

Flood-related interruptions to electricity delivery from Erzin NGCCPP are managed through Akenerji's existing Business Continuity Plan and associated operational and electricity trading processes. Regular reviews enhance the relevant response arrangements by considering potential effects on site access, switchyards and connected transmission infrastructure through which electricity is delivered to the market. Business continuity measures support coordination with relevant infrastructure operators, timely evaluation of connection availability and continuity of critical operational communication during heavy precipitation and flooding events. If electricity delivery is restricted, generation schedules, market nominations and trading positions are reviewed and adjusted to limit imbalance exposure, replacement power requirements and disruption to contracted positions. These measures strengthen coordination between generation and electricity trading functions and support efforts to limit the duration and financial effects of flood-related connection constraints. The exposure is monitored across the short, medium and long term and reflected in ongoing risk assessment and operational planning. Akenerji does not currently anticipate disposing of Erzin NGCCPP in response to this risk. [Add row]

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

Climate change

(3.1.2.1) Financial metric

Select from:

☑ OPEX

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

101435903

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

Select from:

☑ 11-20%

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

0

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

Select from:

☑ Less than 1%

(3.1.2.7) Explanation of financial figures

Akenerji identified OPEX as the financial metric vulnerable to transition risk arising from the Türkiye ETS. The assessment covers only Erzin NGCCPP, as it is Akenerji's sole natural gas-fired generation facility, the predominant source of the Company's Scope 1 emissions and the only asset in the current generation portfolio expected to be directly exposed to ETS allowance obligations. The disclosed amount represents the estimated minimum annual gross carbon-cost exposure under a long-term scenario in which free allocation is fully phased out and all covered emissions from Erzin NGCCPP are subject to carbon pricing. The calculation applies the 2025 average EU ETS auction price of USD 82.97/tCO2 to the 2025 fossil Scope 1 emissions value of 1,222,561.2 tCO2, resulting in estimated annual gross OPEX exposure of USD 101,435,903. The figure excludes potential electricity-price pass-through, portfolio effects and other mitigating factors. No OPEX amount was identified as vulnerable to physical climate risk under the selected financial metric. The proportion of vulnerable OPEX is calculated against Akenerji's total OPEX within the same financial reporting boundary.

Water

(3.1.2.1) Financial metric

Select from:

☑ Other, please specify :EBITDA

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

0

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

Select from:

☑ Less than 1%

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

2944669

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

Select from:

☑ 11-20%

(3.1.2.7) Explanation of financial figures

Akenerji identified EBITDA as the financial metric vulnerable to physical water risk arising from water stress and changing precipitation patterns. Akenerji's consolidated 2025 EBITDA amounted to TRY 777 million, equivalent to approximately USD 19,631,127 using the 2025 average exchange rate of TRY 39.58/USD. Under the long-term high-emission RCP8.5/SSP5-8.5 pathway, the potential EBITDA effect is estimated at 12%-15%. The disclosed amount of USD 2,944,669 represents the upper boundary of this range, equivalent to 15% of the 2025 EBITDA baseline and corresponding to the 11-20% proportion band. The estimate relates to the potential effects of reduced precipitation and river flows on Feke I, Feke II, Gökkaya and Himmetli HEPPs. It represents the maximum quantified physical-risk

exposure rather than the full EBITDA amount and may be partially mitigated through Erzin NGCCPP generation, portfolio balancing, electricity trading and market-price effects. No amount of EBITDA was identified as vulnerable to water-related transition risk.
[Add row]

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

Row 1

(3.2.1) Country/Area & River basin

Türkiye
☑ Other, please specify :Seyhan Basin

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

Select all that apply
☑ Direct operations

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

4

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

Select from:
☑ 26-50%

(3.2.8) % organization's annual electricity generation that could be affected by these facilities

Select from:
☑ 1-25%

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

Select from:

☑ 1-10%

(3.2.11) Please explain

Akenerji's location-specific water-risk screening covers all hydroelectric facilities using WRI Aqueduct and the WWF Water Risk Filter. The assessment identified six HEPPs in areas exposed to High or Extremely High Water Stress. Of these, Feke I, Feke II, Gökkaya and Himmetli HEPPs in the Seyhan Basin were prioritized as locations exposed to substantive water-related risk because WRI Aqueduct classifies them as subject to Extremely High Water Stress under current, 2030 and 2050 conditions. These four facilities have a combined installed capacity of 157 MW and represent 12.8% of Akenerji's generation portfolio. Uluabat and Burç Bendi HEPPs were also identified through the screening process as being located in High Water Stress areas. However, they are not included in the quantified substantive-risk assessment presented in 3.1.1, which focuses on the four Extremely High Water Stress facilities. Under the RCP2.6/SSP1-2.6 and RCP8.5/SSP5-8.5 pathways, declining precipitation and hydrological variability may reduce river flows and hydroelectric generation at the four priority facilities. Potential financial effects are assessed through EBITDA-based scenario analysis. Generation from Erzin NGCCPP, portfolio balancing, electricity trading and market-price effects may partially mitigate the exposure, although these measures may be constrained during widespread or prolonged drought.
[Add row]

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

	Water-related regulatory violations
	Select from: ☑ No

[Fixed row]

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

Select from:

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

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

The Türkiye Emissions Trading System Regulation was published in the Official Gazette in August 2026, establishing the overarching legal and operational framework for the Turkish ETS. The system will commence with a pilot period, while the scope, duration and detailed implementation arrangements for this period will be determined by the Carbon Market Board. Akenerji is therefore preparing for the phased implementation of the system and the compliance requirements that will apply to covered installations. Based on the activities and installation categories defined in the Regulation, Akenerji expects Erzin Natural Gas Combined Cycle Power Plant, with an installed capacity of 904 MW, to be the only generation asset in its current portfolio directly covered by the system. Erzin NGCCPP is Akenerji's sole natural gas-fired generation facility, has annual emissions exceeding the Category C threshold and is the predominant source of the Company's Scope 1 emissions. Akenerji's hydroelectric and wind power plants do not generate direct emissions from electricity generation and are therefore not expected to be directly covered. Akenerji's compliance strategy covers greenhouse gas emissions permitting, emissions monitoring, reporting and verification, preparation of the required monitoring and monitoring-methodology plans, registry readiness, allowance-management planning and assessment of future surrender obligations. Erzin NGCCPP already monitors, reports and independently verifies its emissions under applicable national requirements. GHG emissions across Akenerji's operations are calculated using a methodology aligned with the GHG Protocol and assessed in accordance with ISO 14064-1. These processes provide the verified installation-level data needed to assess potential allowance requirements and support future compliance. The Regulation establishes a benchmark-based free-allocation framework. The applicable installation and sub-installation benchmarks, sector coefficients and free-allocation rates will be determined through the National Allocation Plan and subsequent Carbon Market Board decisions. Akenerji will assess its expected free allocation against verified emissions and activity levels, determine any allowance shortfall and plan allowance procurement and surrender through the relevant registry and ETS market. Developments concerning allocation rules, allowance prices, price-stability measures, banking, borrowing and other flexibility mechanisms will be monitored as further decisions and secondary arrangements are published. Regulatory and financial exposure is monitored through Akenerji's Enterprise Risk Management framework. Climate-related regulatory risks are assessed annually by the Sustainability Committee in coordination with the Strategic Planning and Risk Department and relevant business units. The assessment considers potential effects on operating costs, electricity-market prices, cash flows, asset valuations, financing conditions, trading margins and portfolio performance. High-scoring risks are monitored at Board level. Akenerji uses an internal carbon price of USD 20–30/tCO2 in its risk, opportunity and investment assessments and plans to align this progressively with European carbon-market levels. Scenario analysis considers alternative allowance-price trajectories, possible free-allocation arrangements and the extent to which carbon costs may be reflected in electricity-market prices. Operational measures focus on maintaining Erzin NGCCPP's efficiency through the ISO 50001 Energy Management System and independently verified emissions data. Erzin NGCCPP's emissions factor is below the national average, which may provide a relative advantage compared with more carbon-intensive generation. Akenerji is also diversifying its generation portfolio through lower-carbon and renewable investments, including the 7.79 MWp hybrid solar investment at the Erzin NGCCPP. Akenerji does not currently plan to rely on carbon credits to meet its emissions-reduction targets or anticipated ETS obligations. Any future use of carbon credits would be evaluated against the eligibility criteria, limits and other requirements to be established by the relevant authorities.

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

	Environmental opportunities identified
Climate change	*Select from:* ☑ Yes, we have identified opportunities, and some/all are being realized
Water	*Select from:* ☑ Yes, we have identified opportunities, and some/all are being realized

[Fixed row]

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

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp1

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Markets

☑ Stronger competitive advantage

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ Türkiye

(3.6.1.8) Organization specific description

The progressive development of the Türkiye ETS presents a strategic opportunity for Akenerji as the carbon-pricing framework moves into pilot and early implementation stages. In the medium term, the system may create a positive financial effect through benchmark-based free allocation, electricity-market price formation and the relative emissions efficiency of Akenerji's portfolio. The applicable benchmarks, sector coefficients and allocation rates will be determined through the National Allocation Plan and subsequent Carbon Market Board decisions; Akenerji therefore assesses a range of allocation and price assumptions. Erzin NGCCPP is Akenerji's only generation asset expected to be directly covered and has an emissions factor below the national average. This may result in a lower allowance requirement than for more carbon-intensive generation. Carbon costs may also be reflected in wholesale electricity prices, depending on market conditions and cost pass-through. Akenerji's HEPPs and Ayyıldız WPP are not expected to incur direct allowance costs from electricity generation, while their electricity will be sold in markets where carbon pricing may influence prices. Akenerji's scenario analysis indicates a potential positive annual net EBITDA effect of 1%-2% in the medium term. Based on 2025 EBITDA, this equals approximately USD 196,311-392,623. The estimate may change with allocation rules, allowance prices, generation volumes and market conditions.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Increased revenue resulting from price premiums

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

Select all that apply

☑ Medium-term

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

Select from:

☑ Very likely (90–100%)

(3.6.1.12) Magnitude

Select from:

☑ Medium

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

The progressive development of the Türkiye ETS may create a positive financial effect for Akenerji over the medium term through benchmark-based free allocation, electricity-market price formation and the relative emissions efficiency of Akenerji's generation portfolio. Erzin NGCCPP is Akenerji's only generation asset expected to be directly covered and has an emissions factor below the national average. This may result in a comparatively lower allowance requirement than for more carbon-intensive generation sources. Carbon costs incurred by market participants may also be reflected in wholesale electricity prices, depending on allowance prices, market conditions and the extent of cost pass-through. Akenerji's HEPPs and WPP are not expected to incur direct allowance costs from electricity generation but may benefit from electricity-market prices influenced by carbon pricing. Based on Akenerji's scenario analysis, these factors could result in a positive annual net EBITDA effect of approximately 1%-2% in the medium term.

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

Select from:

☑ Yes

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

196311

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

392623

(3.6.1.23) Explanation of financial effect figures

Akenerji's scenario analysis indicates that the Türkiye ETS may provide a positive annual net EBITDA effect of approximately 1%-2% over the medium term. The potential contribution reflects the expected interaction between carbon-cost pass-through to electricity-market prices, possible free allocation during the early implementation period, Erzin NGCCPP's emissions factor, which is below the national average, and the contribution of Akenerji's renewable generation portfolio. Akenerji's consolidated 2025 EBITDA amounted to TRY 777 million, equivalent to approximately USD 19,631,127 using the 2025 average exchange rate of TRY 39.58/USD. Applying the estimated 1%-2% range results in an anticipated annual medium-term financial effect of approximately USD 196,311-392,623. The estimate is forward-looking and may change depending on Turkish ETS allowance prices, free-allocation arrangements, electricity-market price formation, Erzin NGCCPP's generation and emissions, and the final implementation rules.

(3.6.1.24) Cost to realize opportunity

38021

(3.6.1.25) Explanation of cost calculation

The cost to realize the opportunity is based on the carbon-emissions-management component of Akenerji's 2025 environmental expenditure. Total expenditure on environmental monitoring, measurement and continuous-improvement activities amounted to TRY 11,784,402, of which 12.77%, equivalent to TRY 1,504,868, related to carbon-emissions management. Using the 2025 average exchange rate of TRY 39.58/USD, this corresponds to approximately USD 38,021. The expenditure supports activities required to prepare for and capture potential benefits from the Türkiye ETS, including greenhouse gas emissions measurement, reporting and independent verification, regulatory monitoring, carbon-price scenario analysis and integration of carbon-related assumptions into risk, opportunity and investment assessments.

(3.6.1.26) Strategy to realize opportunity

Akenerji's strategy is to prepare for the Türkiye ETS while using the relative emissions efficiency of Erzin NGCCPP and the Company's renewable generation portfolio to capture potential market and portfolio benefits. Erzin NGCCPP's emissions factor is below the national average and lower than that of more carbon-intensive generation sources. As carbon costs are incorporated into electricity-market prices, this positioning may provide a relative cost and margin advantage, subject to the final allowance-allocation rules and the extent of carbon-cost pass-through. Akenerji calculates its GHG emissions annually using a methodology aligned with the GHG Protocol and assessed in accordance with ISO 14064-1. Erzin NGCCPP's emissions are monitored, reported and independently verified under applicable national requirements. Verified emissions data support assessment of potential allowance requirements, free-allocation effects and the financial implications of alternative carbon-price pathways. Akenerji monitors carbon-pricing developments and uses scenario analysis to assess potential effects on electricity prices, operating costs, trading margins and portfolio performance. An internal carbon price of USD 20–30/tCO2 is used in risk, opportunity and investment assessments and is planned to align progressively with European carbon-market levels. The Company also maintains Erzin NGCCPP's operational efficiency through its ISO 50001 Energy Management System and continues to diversify its generation portfolio through lower-carbon and renewable investments. This includes the 7.79 MWp hybrid solar investment at the Erzin site. Together, verified emissions management, operational efficiency, carbon-price analysis and portfolio diversification support Akenerji's ability to capture potential ETS-related revenue, margin and resilience benefits.

Water

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp2

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Products and services

☑ Increased sales of existing products and services

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ Türkiye

(3.6.1.6) River basin where the opportunity occurs

Select all that apply

☑ Other, please specify :Seyhan and Susurluk Basins, Türkiye

(3.6.1.8) Organization specific description

Favorable precipitation and hydrological conditions may create a water-related opportunity for Akenerji by increasing river flows and usable water availability for hydroelectric generation. The opportunity applies to Akenerji's seven HEPPs, which have a combined installed capacity of 292 MW and represent approximately 24% of the Company's 1,224 MW generation portfolio. Higher usable water inflows may improve capacity utilization and increase renewable electricity generation from the existing HEPP portfolio, supporting increased electricity sales without requiring a new product or service. Supportive hydrological conditions may mitigate the operational and financial effects of water stress, drought and reduced river flows on hydroelectric generation. The extent of the opportunity will depend on the timing and geographic distribution of precipitation, the resulting usable water inflows, plant availability and operating constraints, as well as prevailing electricity prices and portfolio requirements.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Increased revenues resulting from increased production capacity

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

Select all that apply

☑ Short-term

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

Select from:

☑ More likely than not (50–100%)

(3.6.1.12) Magnitude

Select from:

☑ Medium

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

Increased usable water inflows may improve capacity utilization and raise electricity generation across Akenerji's 292 MW HEPP portfolio in the short term. Higher hydroelectric output may support increased electricity sales, generation margins and operating cash flows, while strengthening the contribution of renewable generation to Akenerji's portfolio. The financial benefit will depend on the extent to which precipitation translates into usable river flows within plant operating and safety limits. Plant availability, generation schedules, electricity prices and portfolio requirements will also influence the realizable effect. Heavy precipitation that results in flooding, operational restrictions or safety-related water releases would not generate the same benefit and may limit the additional volume of electricity produced.

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

Select from:

☑ Yes

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

196311

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

588934

(3.6.1.23) Explanation of financial effect figures

The estimates are reported in USD and use Akenerji's 2025 EBITDA as the common financial baseline. Consolidated 2025 EBITDA was TRY 777 million, equivalent to approximately USD 19,631,127 using the 2025 average exchange rate of TRY 39.58/USD. For the short-term range, minimum is USD 196,311, equal to 1% of 2025 EBITDA, and represents a scenario in which additional usable water inflows result in a limited increase in generation and electricity sales. The maximum is USD 588,934, equal to 3% of 2025 EBITDA, and represents a scenario in which stronger usable water inflows support a more significant increase in generation across Akenerji's 292 MW HEPP portfolio. The estimated range reflects potential additional revenue from increased hydroelectric generation and electricity sales. The actual financial benefit will depend on the timing and geographic distribution of precipitation, resulting usable river flows, plant availability, operating and safety limits, generation volumes and electricity prices. The calculation does not assume that all precipitation can be converted into additional generation, as flooding, operational constraints and safety-related water management may limit the realizable benefit.

(3.6.1.24) Cost to realize opportunity

0

(3.6.1.25) Explanation of cost calculation

The opportunity is realized through Akenerji's existing hydroelectric generation, hydrological monitoring, operational planning and portfolio management processes. Supportive precipitation and increased river flows do not require additional expenditure to create the underlying water availability. Existing HEPP assets, personnel and systems are used to assess usable water inflows and optimize generation within operational and safety requirements. As no additional personnel, systems, external services or dedicated capital expenditure is required specifically to realize this opportunity, the cost is reported as USD 0.

(3.6.1.26) Strategy to realize opportunity

Akenerji manages supportive water inflows through its existing hydroelectric generation planning and integrated portfolio management processes. Hydrological conditions and available river flows are assessed to determine the generation potential of the Company's seven HEPPs within applicable operating and safety limits. Where usable water availability supports additional generation, production schedules and electricity market positions are optimized to increase renewable electricity output and sales. The opportunity is prioritized because it can improve the utilization of existing HEPP assets, support generation margins and strengthen the renewable contribution of Akenerji's portfolio without requiring the development of a new product or dedicated investment. The extent of realization is monitored through water availability, plant operating conditions, generation performance and electricity market developments. As of the preparation date of this report, exceptional high rainfall conditions, particularly in the Mediterranean region, supported record hydroelectric generation in Türkiye; while such conditions may create an acute opportunity for Akenerji's hydroelectric assets, they also reflect increasing hydrological variability associated with a changing climate, and their timing, magnitude and recurrence remain inherently uncertain and cannot be assumed in future generation planning.
[Add row]

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

Climate change

(3.6.2.1) Financial metric

Select from:

☑ OPEX

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

38021

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

Select from:

☑ Less than 1%

(3.6.2.4) Explanation of financial figures

Akenerji identified OPEX as the reporting-year financial metric aligned with the Türkiye ETS opportunity. The reported amount represents the carbon-emissions-management component of Akenerji's 2025 environmental expenditure, which supports the Company's preparation for the developing carbon-pricing framework and its ability to capture potential market and portfolio benefits. Total expenditure on environmental monitoring, measurement and continuous-improvement activities amounted to TRY 11,784,402 in 2025, of which 12.77%, equivalent to TRY 1,504,868, was related to carbon-emissions management. Using the 2025 average exchange rate of TRY 39.58/USD, the aligned OPEX amounted to approximately USD 38,021, representing less than 1% of Akenerji's total OPEX. The expenditure supports greenhouse gas emissions measurement, reporting and independent verification, regulatory monitoring, carbon-price scenario analysis, and the integration of carbon-related assumptions into risk, opportunity and investment assessments.

Water

(3.6.2.1) Financial metric

Select from:

☑ Other, please specify :EBITDA

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

0

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

Select from:

☑ Less than 1%

(3.6.2.4) Explanation of financial figures

Akenerji identified EBITDA as the financial metric most relevant to the Water opportunity associated with increased hydroelectric generation under supportive hydrological conditions. However, the specific opportunity described in Question 3.6.1 relates to unusually favorable rainfall and water-inflow conditions observed in 2026, after the end of the 2025 reporting year. Accordingly, no EBITDA amount was aligned with this opportunity during the reporting year. Any future financial benefit will depend on actual usable water inflows, hydroelectric generation volumes, plant availability, electricity-market prices, portfolio-balancing requirements and trading conditions. If a measurable benefit is realized, Akenerji intends to assess it through its effect on EBITDA rather than disclose facility-level revenue. The timing, magnitude and recurrence of favorable hydrological conditions remain uncertain and are not assumed in future generation planning.
[Add row]

C4. Governance

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

(4.1.1) Board of directors or equivalent governing body

Select from:

☑ Yes

(4.1.2) Frequency with which the board or equivalent meets

Select from:

☑ More frequently than quarterly

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

Select all that apply

☑ Executive directors or equivalent

☑ Non-executive directors or equivalent

☑ Independent non-executive directors or equivalent

(4.1.4) Board diversity and inclusion policy

Select from:

☑ Yes, and it is publicly available

(4.1.5) Briefly describe what the policy covers

Akenerji's Diversity and Inclusion Policy sets out how we seek to achieve and strengthen diversity on the Board of Directors. The policy requires Board candidates to be assessed based on their knowledge, skills, experience, competencies and suitability for the role, without gender discrimination. It promotes equal opportunity and diversity without discrimination based on language, race, ethnicity, gender, political opinion, philosophical belief, religion, sect, sexual orientation, family responsibilities, age, health status or similar grounds. As of 31 December 2025, two of the eight members of our Board of Directors were women, corresponding to a female representation rate of 25%. We aim to maintain female representation at a minimum of 25% and increase this rate, with progress monitored by the Board. The

Corporate Governance Committee, which also performs the functions of the Nomination Committee, establishes a transparent system for identifying and evaluating suitable Board candidates, formulates related policies and strategies, periodically assesses the Board's structure and effectiveness, and recommends potential changes. Through transparent nomination, monitoring of progress and periodic evaluation of Board composition, we seek to strengthen representation while preserving merit, competency, suitability for the role and the Board's collective effectiveness.

(4.1.6) Attach the policy (optional)

DIVERSITY AND INCLUSION POLICY.pdf
[Fixed row]

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

	Board-level oversight of this environmental issue
Climate change	*Select from:* ☑ Yes
Water	*Select from:* ☑ Yes
Biodiversity	*Select from:* ☑ Yes

[Fixed row]

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

Climate change

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

Select all that apply

☑ Chief Executive Officer (CEO)

☑ Board-level committee

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

Select from:

☑ Yes

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

Select all that apply

☑ Board Terms of Reference

☑ Board mandate

☑ Individual role descriptions

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

Select from:

☑ Scheduled agenda item in some board meetings – at least annually

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

Select all that apply

☑ Reviewing and guiding annual budgets

☑ Overseeing and guiding scenario analysis

☑ Overseeing the setting of corporate targets

☑ Monitoring progress towards corporate targets

☑ Approving corporate policies and/or commitments

☑ Overseeing reporting, audit, and verification processes

☑ Overseeing and guiding the development of a business strategy

☑ Overseeing and guiding acquisitions, mergers, and divestitures

☑ Monitoring supplier compliance with organizational requirements

☑ Overseeing and guiding public policy engagement

☑ Reviewing and guiding innovation/R&D priorities

☑ Approving and/or overseeing employee incentives

☑ Overseeing and guiding major capital expenditures

☑ Monitoring the implementation of the business strategy

☑ Monitoring compliance with corporate policies and/or commitments

☑ Overseeing and guiding the development of a climate transition plan

☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

(4.1.2.7) Please explain

At Akenerji, accountability for climate-related matters is embedded in the governance structure through the Chief Executive Officer (CEO), Sustainability Committee and Board of Directors. The Board retains ultimate oversight through the Board-approved Risk Management System, Corporate Risk Management Procedure and climate-related risk inventory. It evaluates risk management and internal control effectiveness at least annually, receives quarterly performance updates and monitors high-scoring climate risks at Board level. The CEO oversees the integration of climate-related matters into management processes and implementation of the Board's strategic direction. The CEO is informed by the Sustainability Committee and relevant functions about climate-related risks and opportunities, performance indicators, regulatory developments and required actions. Matters addressed in 2025 included physical and transition risks, energy-supply security, carbon-market developments, Türkiye's planned Emissions Trading System, renewable-energy certificates and implications for operations, strategy and investment planning. The Sustainability Committee supports oversight with technical input from the Strategic Planning and Risk Management function. In 2025, its duties and responsibilities were formalized through a written procedure. The Committee identifies and monitors climate and sustainability-related risks, integrates relevant indicators into performance-monitoring systems, reports assessments made during its meetings and initiates actions where required. The risk inventory assigns owners and actions, while high-scoring matters are escalated for Board-level monitoring. These mechanisms connect climate-risk identification, performance monitoring, action planning, strategy and major investment decisions. Actions supported by this governance process in 2025 included preparations for Türkiye's planned Emissions Trading System and continued participation in renewable-energy and voluntary carbon certificate markets. Progress is followed through the risk inventory, assigned actions, performance indicators, quarterly Board updates and the annual review of risk management and internal control effectiveness. The Board considers trade-offs by reviewing financial impact, operational resilience, energy-supply security, regulatory compliance and climate-transition objectives together. In 2025, this included considering short-term energy-market volatility, geopolitical uncertainty and transition-related compliance requirements alongside longer-term opportunities in renewable generation, efficiency and carbon markets. Oversight covers Akenerji's activities under its financial control, including its power plants and relevant consolidated entities. It does not currently extend fully across every upstream and downstream stage of the value chain.

Water

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

Select all that apply

☑ Chief Executive Officer (CEO)

☑ Board-level committee

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

Select from:

☑ Yes

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

Select all that apply

☑ Board Terms of Reference

☑ Board mandate

☑ Individual role descriptions

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

Select from:

☑ Scheduled agenda item in some board meetings – at least annually

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

Select all that apply

☑ Reviewing and guiding annual budgets

☑ Overseeing and guiding scenario analysis

☑ Overseeing the setting of corporate targets

☑ Monitoring progress towards corporate targets

☑ Approving corporate policies and/or commitments

☑ Overseeing reporting, audit, and verification processes

☑ Overseeing and guiding the development of a business strategy

☑ Overseeing and guiding acquisitions, mergers, and divestitures

☑ Monitoring supplier compliance with organizational requirements

☑ Monitoring compliance with corporate policies and/or commitments

☑ Overseeing and guiding the development of a climate transition plan

☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

☑ Overseeing and guiding public policy engagement

☑ Reviewing and guiding innovation/R&D priorities

☑ Approving and/or overseeing employee incentives

☑ Overseeing and guiding major capital expenditures

☑ Monitoring the implementation of the business strategy

(4.1.2.7) Please explain

At Akenerji, water-related matters are governed within the sustainability and risk management framework rather than through a separate water governance structure. Accountability is embedded through the Chief Executive Officer (CEO), Sustainability Committee and Board of Directors. The Board retains ultimate oversight through the Board-approved Risk Management System, Corporate Risk Management Procedure and risk inventory. High-scoring risks are monitored at Board level, with owners and actions assigned through the inventory. The CEO oversees the integration of water considerations into management processes and implementation of the Board's strategic direction. The Sustainability Committee supports oversight by identifying and monitoring sustainability-related risks, integrating relevant indicators into monitoring systems, reporting meeting assessments and initiating actions where required. In 2025, the Committee's responsibilities were formalized through a written procedure, with technical support from the Strategic Planning and Risk Management function. Water-related matters considered through this framework include hydroelectric generation's dependence on water availability and river flows, drought and changing precipitation, seawater use in natural gas combined cycle operations, water withdrawal and wastewater discharge, ecosystem sensitivities, operational continuity and compliance. The 2025 water management review considered physical risks, ecosystem sensitivities and operational continuity. Performance is monitored through facility-level withdrawal, consumption and discharge indicators, environmental monitoring and compliance processes. Actions in 2025 included assessing drought risk using historical generation and precipitation data and RCP2.6 and RCP8.5 pathways, monitoring water withdrawal and wastewater discharge, real-time monitoring of discharge data at Erzin NGCCPP, and controls of wastewater infrastructure and discharge lines. Progress is evaluated through the risk inventory, assigned actions, water and wastewater indicators, monitoring results, compliance records and environmental performance reporting. No environmental incident, accident or regulatory non-compliance related to water or wastewater management was reported in 2025. Trade-offs are considered by assessing operational performance, financial consequences, water availability, ecosystem protection and compliance together. For hydroelectric generation, this includes balancing generation continuity with changing river flows and aquatic ecosystem requirements. For natural gas combined cycle operations, it includes balancing process and cooling-water needs with treatment, discharge control and marine ecosystem considerations. Board-level oversight focuses on Akenerji's direct operations and activities under its financial control.

Biodiversity

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

Select all that apply

☑ Chief Executive Officer (CEO)

☑ Board-level committee

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

Select from:

☑ Yes

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

Select all that apply

☑ Board Terms of Reference

☑ Board mandate
☑ Individual role descriptions

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

Select from:
☑ Scheduled agenda item in some board meetings – at least annually

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

Select all that apply
☑ Reviewing and guiding annual budgets
☑ Overseeing and guiding scenario analysis
☑ Overseeing the setting of corporate targets
☑ Monitoring progress towards corporate targets
☑ Approving corporate policies and/or commitments
☑ Overseeing reporting, audit, and verification processes
☑ Overseeing and guiding the development of a business strategy
☑ Overseeing and guiding acquisitions, mergers, and divestitures
☑ Monitoring supplier compliance with organizational requirements
☑ Monitoring compliance with corporate policies and/or commitments
☑ Overseeing and guiding the development of a climate transition plan
☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities
☑ Overseeing and guiding public policy engagement
☑ Reviewing and guiding innovation/R&D priorities
☑ Approving and/or overseeing employee incentives
☑ Overseeing and guiding major capital expenditures
☑ Monitoring the implementation of the business strategy

(4.1.2.7) Please explain

At Akenerji, the Board of Directors (BoD) oversees biodiversity through the Sustainability Committee, corporate risk management, internal controls and sustainability performance monitoring. Biodiversity-related impacts, risks and opportunities are integrated into the oversight of strategy, investments, policies and operational risks. The Sustainability Committee, chaired by the CEO and comprising senior executives from finance, production, trading, human resources, and strategic planning and risk management, supports the BoD by determining sustainability priorities, policies and targets and monitoring performance. The Sustainability Office coordinates the Committee's agenda, reporting and follow-up. The Strategic Planning and Risk Management Department and designated risk owners identify, assess and monitor biodiversity-related risks through the corporate risk inventory. High-scoring risks are escalated to the BoD with assigned owners and action plans. The BoD evaluates the effectiveness of risk management and internal controls at least annually and receives quarterly performance updates. In 2025, biodiversity-related governance inputs included environmental performance, regulatory and reporting requirements, Environmental Impact Assessment processes, and environmental risks

associated with operations and investments. Information provided to management included marine ecosystem monitoring at Erzin NGCCPP, fish-passage functionality at hydroelectric plants, and bird and terrestrial biodiversity observations at Ayyıldız Wind Power Plant. Monitoring, compliance and risk-assessment findings were used to determine preventive or corrective actions and were escalated where material. The Sustainability Committee and relevant functions contribute to integrating biodiversity into environmental and corporate risk management, continuing facility-level ecological monitoring and maintaining preventive controls during investment and operation. Biodiversity-related trade-offs are considered through strategy, investment and risk-management processes, including the balance between operational or investment requirements, regulatory compliance, ecosystem protection and long-term resilience. No sustainability-related risk or opportunity requiring a specific trade-off was identified during 2025. Board oversight primarily covers Akenerji's own operations and investments. Wider value-chain impacts are considered through materiality, sustainability-risk and stakeholder processes; however, a dedicated biodiversity oversight mechanism does not currently cover every stage of the value chain.
[Fixed row]

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

Climate change

(4.2.1) Board-level competency on this environmental issue

Select from:
☑ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply
☑ Consulting regularly with an internal, permanent, subject-expert working group
☑ Engaging regularly with external stakeholders and experts on environmental issues
☑ Integrating knowledge of environmental issues into board nominating process
☑ Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)
☑ Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Additional training
☑ Training in an environmental subject by a certified organization, please specify :KGK (Public Oversight, Accounting and Auditing Standards Authority of Türkiye)

Experience

☑ Executive-level experience in a role focused on environmental issues

☑ Management-level experience in a role focused on environmental issues

☑ Staff-level experience in a role focused on environmental issues

Water

(4.2.1) Board-level competency on this environmental issue

Select from:

☑ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

☑ Consulting regularly with an internal, permanent, subject-expert working group

☑ Engaging regularly with external stakeholders and experts on environmental issues

☑ Integrating knowledge of environmental issues into board nominating process

☑ Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)

☑ Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Experience

☑ Executive-level experience in a role focused on environmental issues

☑ Management-level experience in a role focused on environmental issues

☑ Staff-level experience in a role focused on environmental issues

[Fixed row]

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

	Management-level responsibility for this environmental issue
Climate change	*Select from:* ☑ Yes
Water	*Select from:* ☑ Yes
Biodiversity	*Select from:* ☑ Yes

[Fixed row]

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

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Committee

☑ Sustainability committee

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

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

☑ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

☑ Managing public policy engagement related to environmental issues

☑ Managing supplier compliance with environmental requirements

☑ Managing value chain engagement related to environmental issues

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

☑ Measuring progress towards environmental corporate targets

☑ Setting corporate environmental policies and/or commitments

☑ Setting corporate environmental targets

Strategy and financial planning

☑ Developing a climate transition plan

☑ Managing major capital and/or operational expenditures relating to environmental issues

☑ Managing annual budgets related to environmental issues

☑ Implementing the business strategy related to environmental issues

☑ Developing a business strategy which considers environmental issues

☑ Managing acquisitions, mergers, and divestitures related to environmental issues

(4.3.1.4) Reporting line

Select from:

☑ Reports to the Chief Executive Officer (CEO)

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

Select from:

☑ More frequently than quarterly

(4.3.1.6) Please explain

The Sustainability Committee is the highest management-level body with responsibility for climate issues at Akenerji. Structured as a cross-functional committee chaired by the Chief Executive Officer (CEO), it supports the integration of sustainability and climate-related considerations into corporate strategy, risk management,

target-setting and reporting processes. Its scope covers Akenerji's own operations and relevant value chain considerations, including climate-related risks and opportunities, greenhouse gas emissions, energy efficiency, decarbonization initiatives and regulatory developments. The Committee is informed through inputs from operational units, corporate risk management processes, sustainability reporting activities and relevant working groups. Climate-related dependencies, impacts, risks and opportunities are assessed at unit level and consolidated through Akenerji's enterprise risk management approach. These assessments are reflected in the corporate risk matrix and reviewed periodically in line with internal risk monitoring cycles. The Committee monitors progress against sustainability and climate-related objectives, evaluates required actions and ensures that relevant findings are considered in strategic and operational decision-making. Controls and procedures for climate-related issues are integrated with internal functions including production, risk management, finance, investment planning, sustainability, reporting and compliance. This enables climate-related topics such as decarbonization, ETS-related obligations, physical climate risks, transition risks and long-term resilience to be assessed together with operational and financial priorities. The Committee also supports the preparation and review of sustainability disclosures, including the integrated annual report and TSRS-aligned reporting, and escalates key climate-related matters to the Board of Directors where strategic oversight is required.

Water

(4.3.1.1) Position of individual or committee with responsibility

Committee

☑ Sustainability committee

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

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

☑ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

☑ Managing public policy engagement related to environmental issues

☑ Managing supplier compliance with environmental requirements

☑ Managing value chain engagement related to environmental issues

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

☑ Measuring progress towards environmental corporate targets

☑ Setting corporate environmental policies and/or commitments

☑ Setting corporate environmental targets

Strategy and financial planning

☑ Developing a climate transition plan

☑ Managing major capital and/or operational expenditures relating to environmental issues

☑ Managing annual budgets related to environmental issues

☑ Implementing the business strategy related to environmental issues

☑ Developing a business strategy which considers environmental issues

☑ Managing acquisitions, mergers, and divestitures related to environmental issues

(4.3.1.4) Reporting line

Select from:

☑ Reports to the Chief Executive Officer (CEO)

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

Select from:

☑ More frequently than quarterly

(4.3.1.6) Please explain

The Sustainability Committee is the highest management-level body with responsibility for water-related issues at Akenerji. Structured as a cross-functional committee chaired by the Chief Executive Officer (CEO), it oversees the integration of water-related dependencies, impacts, risks and opportunities into sustainability, risk management and operational decision-making processes. Given the importance of water availability for Akenerji's generation portfolio, particularly its hydroelectric assets and water-intensive operations, the Committee supports responsible water use, operational continuity, regulatory compliance and long-term resilience. The Committee is informed through operational units, environmental monitoring, corporate risk management and sustainability reporting processes. Water withdrawal, discharge, consumption, water stress, wastewater management, drought-related risks and compliance with the Water Pollution Control Regulation and discharge standards are monitored at facility level and consolidated through internal reporting channels. The Committee also oversees ISO 14046-based water footprint assessments and related verification processes. Water-related risks and opportunities are assessed at facility level, including drought scenarios, water stress analyses and operational dependencies evaluated in line with IPCC projections and WRI Aqueduct risk layers. Findings are consolidated through Akenerji's enterprise risk management approach and reviewed periodically in line with internal risk monitoring cycles. Related controls are integrated with production, environment, risk management, finance, investment planning, sustainability and reporting functions. This enables water-related risks and opportunities to be evaluated together with operational and financial priorities. The Committee also supports the review of sustainability disclosures and ensures that water management remains integrated into Akenerji's broader environmental strategy.

Biodiversity

(4.3.1.1) Position of individual or committee with responsibility

Committee

☑ Sustainability committee

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

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

☑ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

☑ Managing public policy engagement related to environmental issues

☑ Managing supplier compliance with environmental requirements

☑ Managing value chain engagement related to environmental issues

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

☑ Measuring progress towards environmental corporate targets

☑ Setting corporate environmental policies and/or commitments

☑ Setting corporate environmental targets

Strategy and financial planning

☑ Developing a climate transition plan

☑ Managing major capital and/or operational expenditures relating to environmental issues

☑ Managing annual budgets related to environmental issues

☑ Implementing the business strategy related to environmental issues

☑ Developing a business strategy which considers environmental issues

☑ Managing acquisitions, mergers, and divestitures related to environmental issues

(4.3.1.4) Reporting line

Select from:

☑ Reports to the Chief Executive Officer (CEO)

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

Select from:

☑ More frequently than quarterly

(4.3.1.6) Please explain

The Sustainability Committee is the highest management-level body with responsibility for biodiversity and ecosystem-related issues at Akenerji. Structured as a cross-functional committee chaired by the Chief Executive Officer (CEO), it oversees the integration of biodiversity-related dependencies, impacts, risks and opportunities into environmental management, sustainability, risk management and operational decision-making processes. The Committee is informed through environmental management reports, site-level monitoring activities, regulatory updates, sustainability reporting processes and inputs from relevant internal functions. Biodiversity and ecosystem-related topics are monitored at facility level in line with Environmental Impact Assessment (EIA) requirements, applicable permits, national conservation regulations and Akenerji's ISO 14001:2015 Environmental Management System. Site-level practices include environmental impact monitoring, assessment of potential effects on sensitive species and habitats, and preventive actions to support ecosystem continuity. Biodiversity-related risks and opportunities are assessed as part of Akenerji's corporate risk management approach and reviewed periodically through internal monitoring cycles. These assessments consider habitat alteration, ecological sensitivity, ecosystem continuity, regulatory compliance and long-term nature-related changes. Related controls and procedures are integrated with production, environment, risk management, sustainability, compliance and reporting functions. The Committee also supports the preparation and review of sustainability disclosures and ensures that biodiversity management remains embedded in Akenerji's broader environmental and sustainability strategy. [Add row]

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

Climate change

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

Select from:

☑ No, but we plan to introduce them in the next two years

(4.5.3) Please explain

Akenerji's current remuneration framework does not directly link monetary incentives for Board members or senior executives to quantified climate-related performance indicators. The remuneration approach consists of fixed payments and bonuses based on company and individual performance. In 2025, individual scorecards included financial, customer, process, technology and long-term strategy dimensions, as well as broader sustainability-related objectives; however, no climate-related metric directly determined monetary remuneration. Climate-related risks and opportunities are managed under the Corporate Risk Management Procedure and regular reporting mechanisms. Akenerji recognizes the value of further aligning incentives with its climate-related commitments and plans to introduce measurable climate-related KPIs into the executive compensation framework within the next two years.

Water

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

Select from:

☑ No, but we plan to introduce them in the next two years

(4.5.3) Please explain

Akenerji's remuneration framework does not directly link monetary incentives for Board members or senior executives to quantified water-related performance indicators. Remuneration consists of fixed payments and bonuses based on company and individual performance. In 2025, individual scorecards covered financial, customer, process, technology, long-term strategy and broader sustainability objectives; however, no water-related metric directly determined remuneration. Water-related priorities, including water efficiency, wastewater management, compliance with discharge regulations and effective resource management, are integrated into operational, environmental monitoring, risk management and reporting processes, but are not yet formalized as direct remuneration criteria. Given the strategic importance of water availability for its hydroelectric portfolio, Akenerji plans to introduce measurable water-related KPIs into its executive compensation framework within the next two years.
[Fixed row]

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

	Does your organization have any environmental policies?
	Select from: ☑ Yes

[Fixed row]

(4.6.1) Provide details of your environmental policies.

Row 1

(4.6.1.1) Environmental issues covered

Select all that apply

☑ Climate change

☑ Water

☑ Biodiversity

(4.6.1.2) Level of coverage

Select from:

☑ Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

☑ Direct operations

☑ Upstream value chain

(4.6.1.4) Explain the coverage

Our Sustainability Policy, which is aligned with the Paris Agreement and the United Nations Sustainable Development Goals, covers Akenerji's environmental, social and governance commitments across its operations and business processes. Its environmental scope includes compliance with national and international environmental regulations and standards, climate change mitigation and adaptation, pollution prevention, sustainable use of natural resources, water efficiency, waste reduction, circular economy, biodiversity and ecosystem protection, energy efficiency and low-carbon production. The policy's commitments to water efficiency, responsible water use, water treatment and pollution prevention support SDG 6 on Clean Water and Sanitation. It also addresses suppliers, employees and stakeholders through a participatory, transparent and responsible approach to environmental risk management and supply chain ESG performance. The policy scope is reflected in Akenerji's broader environmental approach, under which greenhouse gas emissions, energy and water consumption, waste management and impacts on ecosystems are monitored, while resource efficiency, reduction of environmental footprint and operational resilience are treated as core sustainability priorities. No specific biome or ecoregion is identified in the policy. The policy does not state any exclusions by geography or business activity; therefore, it applies to Akenerji's relevant operations and business processes.

(4.6.1.5) Environmental policy content

Environmental commitments

☑ Commitment to a circular economy strategy

☑ Commitment to comply with regulations and mandatory standards

☑ Commitment to take environmental action beyond regulatory compliance

☑ Commitment to respect legally designated protected areas

Water-specific commitments

☑ Commitment to control/reduce/eliminate water pollution

☑ Commitment to reduce water consumption volumes

☑ Commitment to reduce water withdrawal volumes

☑ Commitment to the conservation of freshwater ecosystems

Social commitments

☑ Adoption of the UN International Labour Organization principles

☑ Commitment to promote gender equality and women's empowerment

☑ Commitment to respect internationally recognized human rights

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

Select all that apply

☑ Yes, in line with the Paris Agreement

☑ Yes, in line with Sustainable Development Goal 6 on Clean Water and Sanitation

(4.6.1.7) Public availability

Select from:

☑ Publicly available

(4.6.1.8) Attach the policy

akenerji-surdurulebilirlik-politikasi-tr.pdf
[Add row]

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

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

Select from:

☑ Yes

(4.10.2) Collaborative framework or initiative

Select all that apply

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

☑ Task Force on Nature-related Financial Disclosures (TNFD)

☑ UN Global Compact

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

Akenerji aligns its sustainability and environmental governance practices with internationally recognized frameworks and initiatives to strengthen transparency, accountability and long-term value creation. As an active participant in the UN Global Compact since 2022, Akenerji integrates its ten principles covering human rights, labour, environment and anti-corruption into its business practices. From an environmental perspective, this supports the Company’s commitments to responsible operations, environmental compliance, pollution prevention, resource efficiency and climate action. Akenerji also reports its progress through the Communication on Progress process. Akenerji is a TNFD Early Adopter and publishes climate- and nature-related disclosures aligned with the recommendations of both the TCFD and TNFD. These disclosures support the structured assessment and communication of governance, strategy, risk management, metrics and targets related to climate change, water, biodiversity and ecosystem-related dependencies, impacts, risks and opportunities across Akenerji’s operations and value chain.

[Fixed row]

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

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

Yes

☑ Yes, we engaged directly with policy makers

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

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

Select from:

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

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

Select all that apply

☑ Paris Agreement

☑ Sustainable Development Goal 6 on Clean Water and Sanitation

(4.11.4) Attach commitment or position statement

akenerji_2025_EFR.pdf

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

Select from:

☑ It is not possible or relevant for my organization or the intermediary organization to be registered

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

Akenerji applies a structured internal review process to ensure that external engagement activities on environmental matters are consistent with its Sustainability Policy, environmental commitments and transition-related priorities. Engagements that may influence environmental policy, law or regulation are coordinated with the involvement of relevant functions and reviewed against Akenerji's commitments on climate change mitigation and adaptation, renewable energy, energy efficiency, responsible resource use, water management, biodiversity and pollution prevention. In line with this process, Akenerji's views on regulatory developments such as the Draft Climate Law, Draft Emissions Trading System Regulation and Draft Carbon Credit and Offset Regulation are prepared through collaboration between relevant departments under the coordination of the Sustainability Committee. These positions are reviewed for consistency with Akenerji's decarbonization approach, renewable energy strategy, operational resilience priorities and environmental risk management framework. As part of its regulatory engagement and capacity-building activities, Akenerji participated in the ISSB workshop organized on 13 November 2025 by KGK, the Public Oversight, Accounting and Auditing Standards Authority. Following internal review and senior management approval, official positions may be shared through relevant business associations and stakeholder channels, including YASED and TÜSİAD, and submitted to competent public authorities such as the Climate Change Presidency, where applicable. The process is linked to Akenerji's identified environmental dependencies, impacts, risks and opportunities. Climate transition risks, ETS-related developments, physical climate impacts, water availability, hydrological conditions, emissions management, resource efficiency and biodiversity considerations are evaluated together with operational and financial priorities. This supports a common approach across business functions and helps ensure that external engagement remains aligned with Akenerji's broader sustainability governance and value creation model. If a potential inconsistency is identified, the relevant engagement content or position is reassessed before external communication. Where necessary, the statement is revised, escalated to senior management or not pursued until alignment with Akenerji's environmental commitments and transition-related priorities is ensured.
[Fixed row]

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

Row 1

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

Türkiye Sustainability Reporting Standards (TSRS), including TSRS 1 General Requirements for Disclosure of Sustainability-related Financial Information and TSRS 2 Climate-related Disclosures. TSRS is aligned with IFRS S1 and IFRS S2 and requires eligible companies to disclose sustainability- and climate-related risks and opportunities under governance, strategy, risk management, and metrics and targets.

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

Select all that apply

☑ Climate change

☑ Water

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

Transparency and due diligence

☑ Corporate environmental reporting

☑ Mandatory environmental reporting

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

Select from:

☑ National

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

Select all that apply

☑ Turkey

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

Select from:

☑ Support with no exceptions

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

Select all that apply

☑ Participation in working groups organized by policy makers

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

0

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

TSRS supports Akenerji's environmental commitments and transition-related priorities by requiring structured, comparable and decision-useful disclosure of sustainability- and climate-related risks and opportunities under governance, strategy, risk management, and metrics and targets. This framework enables Akenerji to communicate how climate transition risks, physical climate impacts, emissions management, resource efficiency, operational resilience and long-term value creation are integrated into its business model, strategic planning and decision-making processes. Akenerji's engagement on TSRS focuses on understanding implementation requirements, transition reliefs, data expectations and assurance-readiness, and reflecting these requirements in its reporting approach. This has informed internal alignment across sustainability, risk management, finance, operations and reporting functions, with the aim of strengthening data quality, internal controls, consistency of disclosures and comparability for investors and other stakeholders. The regulation is expected to have a positive impact by improving transparency on Akenerji's climate strategy, environmental performance, risk management processes and progress against relevant metrics and targets. Potential implementation challenges, including data collection, internal control design and assurance preparation, are managed through cross-functional coordination and periodic review. The success of Akenerji's engagement is measured by its ability to publish a TSRS-compliant sustainability report that accurately reflects its environmental dependencies, impacts, risks and opportunities, and is supported by appropriate internal controls and third-party assurance readiness. Key indicators include timely publication of the TSRS report, completion of required disclosure areas, consistency between sustainability disclosures and financial reporting processes, improvement in data traceability and governance, resolution of assurance or audit findings, and stakeholder feedback indicating improved transparency and comparability.

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

Select from:

☑ Yes, we have evaluated, and it is aligned

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

Select all that apply

☑ Paris Agreement

☑ Sustainable Development Goal 6 on Clean Water and Sanitation

[Add row]

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

Row 1

(4.11.2.1) Type of indirect engagement

Select from:

☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

Europe

☑ Other trade association in Europe, please specify :TUSIAD and YASED

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

Select all that apply

☑ Climate change

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

Select from:

☑ Consistent

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

Select from:

☑ No, we did not attempt to influence their position

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

Akenerji’s position is broadly consistent with the positions pursued through TÜSİAD and YASED regarding Türkiye’s climate and carbon-market regulatory framework, including the Draft Climate Law, the Draft Emissions Trading System Regulation and the Draft Carbon Credit and Offset Regulation. Akenerji supports the timely, predictable and effective implementation of climate-related regulation, carbon-pricing mechanisms and clear market rules that can contribute to Türkiye’s low-carbon transition while providing regulatory certainty for companies operating in the energy sector. Akenerji’s engagement focuses on understanding and communicating the practical implications of these regulations for emissions management, ETS readiness, carbon-market participation, renewable-energy strategy, operational resilience and long-term decarbonization planning. In this respect, Akenerji’s position is aligned with the broader objective of establishing transparent and implementable regulatory frameworks that support both environmental ambition and business continuity. No material inconsistency was identified between Akenerji’s position and the positions of the organizations engaged with during the reporting year. Therefore, Akenerji did not seek to change their overall positions. Akenerji participated in relevant engagement channels and provided technical information consistent with the associations’ established positions to support technical clarity and effective implementation of the proposed regulations. Where necessary, Akenerji’s inputs are reviewed internally before being shared to ensure consistency with its Sustainability Policy, environmental commitments, risk-management approach and transition-related priorities.

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

0

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

Select from:

☑ Yes, we have evaluated, and it is aligned

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

Select all that apply

☑ Paris Agreement

[Add row]

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

Select from:

☑ Yes

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

Row 1

(4.12.1.1) Publication

Select from:

☑ In mainstream reports

(4.12.1.2) Is your publication in line with a standard or framework?

Select from:

☑ Yes

(4.12.1.3) Standard or framework the publication is in line with

Select all that apply

☑ GRI

☑ IFRS

☑ TCFD

(4.12.1.4) Environmental issues covered in publication

Select all that apply

☑ Climate change

☑ Water

☑ Biodiversity

(4.12.1.5) Status of the publication

Select from:

☑ Complete

(4.12.1.6) Content elements

Select all that apply

☑ Strategy

☑ Governance

☑ Risks & Opportunities

☑ Water-related targets

☑ Value chain engagement

☑ Greenhouse gas emissions figures

☑ Content of environmental policies

☑ Dependencies & Impacts

☑ Public policy engagement

☑ Climate-related targets

☑ Water accounting figures

☑ Water pollution indicators

(4.12.1.7) Page/section reference

Akenerji 2025 Integrated Annual Report: Governance: 68-98 Public policy engagement: 48, 106 Dependencies and impacts: 110-119 Risk & Opportunities: 110-119 Strategy: 98-128 Value chain engagement: 111 Emissions figures: 146-148 Emission targets: 122-123 Water-related targets: 122-123 Water accounting figures: 150-154 Water pollution indicators: 318-319

(4.12.1.8) Attach the relevant publication

Akenerji-Integrated-Annual-Report-2025.pdf

(4.12.1.9) Comment

We publish our governance, strategy, risks and opportunities, value chain engagement, and environmental metrics and targets in the Integrated Annual Report for 1 January–31 December 2025. The report has been prepared in line with the Integrated Reporting Framework and GRI Reporting Standards, with IFRS applied to the financial reporting sections and TCFD used in the assessment of climate-related risks and opportunities. The report presents Akenerji's financial and non-financial performance, including emissions, water management and other environmental performance indicators, within its broader value creation and sustainability approach.

Row 2

(4.12.1.1) Publication

Select from:

☑ In mainstream reports

(4.12.1.2) Is your publication in line with a standard or framework?

Select from:

☑ Yes

(4.12.1.3) Standard or framework the publication is in line with

Select all that apply

☑ IFRS

☑ TCFD

(4.12.1.4) Environmental issues covered in publication

Select all that apply

☑ Climate change

☑ Water

(4.12.1.5) Status of the publication

Select from:

☑ Complete

(4.12.1.6) Content elements

Select all that apply

☑ Strategy

☑ Governance

☑ Risks & Opportunities

☑ Dependencies & Impacts

☑ Climate-related targets

☑ Water accounting figures

☑ Greenhouse gas emissions figures

☑ Content of environmental policies

(4.12.1.7) Page/section reference

Akenerji 2025 TSRS-Compliant Sustainability Report: Governance: 6-11 Content of environmental policies: 10 Strategy: 12-23 Dependencies and impacts: 14-23 Risks and opportunities: 14-23 Greenhouse gas emissions figures: 27-30 Climate-related targets: 31-32 Water accounting figures: 30

(4.12.1.8) Attach the relevant publication

Akenerji_2025_TSRS Report.pdf

(4.12.1.9) Comment

Akenerji separately publishes its 2025 TSRS-Compliant Sustainability Report for the reporting period from 1 January to 31 December 2025. The report was prepared in accordance with TSRS 1 and TSRS 2, which constitute the Turkish adoption of IFRS S1 and IFRS S2. It presents climate-related governance, strategy, risk management, metrics and targets, including climate resilience and scenario analysis, climate-related risks and opportunities, greenhouse gas emissions, water accounting metrics and related targets. The disclosures were subject to limited independent assurance.
[Add row]

C5. Business strategy

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

Climate change

(5.1.1) Use of scenario analysis

Select from:
☑ Yes

(5.1.2) Frequency of analysis

Select from:
☑ Annually

Water

(5.1.1) Use of scenario analysis

Select from:
☑ Yes

(5.1.2) Frequency of analysis

Select from:
☑ Annually
[Fixed row]

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

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☑ IEA NZE 2050

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Policy

☑ Market

☑ Reputation

☑ Technology

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 1.5°C or lower

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025

☑ 2030

☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Changes to the state of nature

☑ Changes in ecosystem services provision

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

Finance and insurance

☑ Cost of capital

Stakeholder and customer demands

☑ Impact of nature footprint on reputation

☑ Sensitivity to inequity of nature impacts

Regulators, legal and policy regimes

☑ Global regulation

☑ Political impact of science (from galvanizing to paralyzing)

☑ Level of action (from local to global)

☑ Global targets

☑ Methodologies and expectations for science-based targets

Relevant technology and science

☑ Data regime (from closed to open)

Macro and microeconomy

☑ Domestic growth

☑ Globalizing markets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Akenerji applied IEA Net Zero Emissions by 2050 within its organization-wide low-emission scenario set, together with NGFS Below 2°C and RCP2.6. The assessment considered an accelerated low-carbon transition characterized by stronger climate policies, wider carbon pricing, growth in renewable energy investment, increasing stakeholder expectations and continuing development of lower-emission technologies. The quantitative assessment considered carbon-price assumptions and their implications for energy production costs, electricity-market pricing, trading activities and financial performance. Under the IEA NZE pathway, EU ETS allowance prices of approximately USD 140/tCO2 in 2030 and USD 250/tCO2 in 2050 were used as external scenario parameters. The analysis also considered potential changes in access to finance, investor expectations, reporting obligations, natural-gas market conditions, portfolio competitiveness and the relative economic position of renewable generation assets. The analysis assumes that climate-policy ambition, carbon-pricing mechanisms and renewable-energy deployment strengthen over time. Key uncertainties include the timing and design of Türkiye's emissions trading system, future carbon-price levels, energy and natural-gas price volatility, technological development, electricity-market conditions, regulatory implementation and the extent to which carbon costs are reflected in electricity prices. The scenario is not treated as a forecast. Results are conditional on the underlying scenario assumptions and may change as policies, markets, technologies and climate conditions evolve. Akenerji reviews climate-related risks and opportunities annually and updates the relevant strategic assessments in response to material developments.

(5.1.1.11) Rationale for choice of scenario

IEA NZE was selected because it provides a recognized energy-sector pathway for examining the implications of an accelerated transition toward net-zero energy-related emissions. The scenario is relevant to Akenerji's mixed generation portfolio, which includes natural-gas, hydroelectric and wind generation, as well as electricity trading activities. The scenario enables Akenerji to assess how stronger carbon pricing, renewable-energy deployment, regulatory change, technology development, stakeholder expectations and financing criteria could affect generation costs, electricity-market prices, trading margins, access to capital, portfolio competitiveness and the relative value of lower-emission generation assets. The scenario was also selected to provide a contrasting low-emission pathway against the high-emission scenario set and to test the resilience of Akenerji's business model under materially different climate-policy, market and technology conditions.

Water

(5.1.1.1) Scenario used

Water scenarios

☑ WRI Aqueduct

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Acute physical

☑ Chronic physical

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025

☑ 2030

☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Speed of change (to state of nature and/or ecosystem services)

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

☑ Other local ecosystem asset interactions, dependencies and impacts driving forces, please specify :Basin related impacts on company's hydroelectricty

Relevant technology and science

☑ Granularity of available data (from aggregated to local)

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Akenerji used the WRI Aqueduct 4.0 Water Risk Atlas to assess baseline and future water risks under the optimistic SSP1-RCP2.6 pathway. The location-based screening covered all nine generation facilities and considered water stress in 2025, 2030 and 2050, together with riverine flood and drought-risk indicators. The assessment identified differences in water exposure between facilities and regions. Based on installed capacity, 25.6% of Akenerji's portfolio was located in areas categorized as having high or extremely high water stress, while 74.4% was located in low or low-medium water-stress areas. Six HEPPs representing 285 MW, or 23.3% of total installed capacity, were exposed to high or extremely high water stress. Feke I, Feke II, Gökkaya and Himmetli HEPPs were exposed to extremely high baseline water stress. The WRI screening was supplemented by Akenerji's analysis of historical HEPP production and future forecast data and by financial modelling that translated projected changes in rainfall and water availability into potential production, revenue and EBITDA effects. Aqueduct is used as a screening and prioritization tool rather than a facility-level hydrological forecast. Key uncertainties include the resolution of global hydrological data, basin-level variation, local water-management conditions, future precipitation patterns, energy prices and the relationship between water availability and production at individual facilities.

(5.1.1.11) Rationale for choice of scenario

WRI Aqueduct 4.0 was selected because it provides a consistent, location-based method for comparing baseline and projected water stress, drought and riverine flood exposure across Akenerji's generation portfolio. The optimistic SSP1-RCP2.6 pathway allows Akenerji to assess whether material water-related risks remain under a lower-emission future and to identify facilities requiring more detailed analysis. This is particularly relevant to the hydroelectric portfolio, where hydrological conditions directly affect generation availability, production planning and financial performance. The results support risk prioritization, production planning, valuation, sensitivity analysis and the assessment of portfolio resilience.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☑ IEA STEPS (previously IEA NPS)

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Acute physical

☑ Chronic physical

☑ Policy

☑ Market

☑ Technology

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 2.5ºC - 2.9ºC

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025

☑ 2030

☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Changes to the state of nature

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

Finance and insurance

☑ Cost of capital

☑ Sensitivity of capital (to nature impacts and dependencies)

Stakeholder and customer demands
☑ Impact of nature footprint on reputation
☑ Sensitivity to inequity of nature impacts

Regulators, legal and policy regimes
☑ Level of action (from local to global)
☑ Global targets

Direct interaction with climate
☑ On asset values, on the corporate
☑ Perception of efficacy of climate regime

Macro and microeconomy
☑ Domestic growth
☑ Globalizing markets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Akenerji applied IEA STEPS within its organization-wide high-emission scenario set, together with NGFS Current Policies and RCP8.5. The scenario set assumes that existing and stated policies continue without the additional policy implementation required for a rapid low-carbon transition. The assessment considered comparatively limited carbon-pricing development, continued reliance on fossil fuels, natural-gas price volatility, geopolitical supply risks, energy-security concerns and stronger physical climate effects. Under IEA STEPS, EU ETS allowance-price assumptions of approximately USD 140/tCO2 in 2030 and USD 160/tCO2 in 2050 were considered. The analysis also examined implications for Akenerji's natural-gas generation costs, electricity prices, trading margins, liquidity and collateral requirements, access to finance and the resilience of its generation portfolio. Key uncertainties include the implementation of stated policies, geopolitical developments, LNG and pipeline-gas availability, electricity and natural-gas prices, future carbon prices, financing conditions and the frequency and severity of physical climate hazards. Carbon-cost pass-through to electricity prices may partly offset production-cost increases, but may also increase price volatility and uncertainty in trading margins. The scenario is not treated as a forecast. Its outcomes depend on the continuation and implementation of stated policies and on future market, regulatory, technological and climate conditions.

(5.1.1.11) Rationale for choice of scenario

IEA STEPS was selected to provide an exploratory pathway based on existing and stated policy settings and to contrast with the more ambitious IEA NZE pathway. It is relevant to Akenerji because the company operates a mixed generation portfolio and is exposed to natural-gas prices, electricity-market volatility, emerging carbon-

pricing mechanisms, financing conditions and increasing physical climate risks. The scenario allows Akenerji to test the resilience of its production, trading, financing and portfolio-management activities under a pathway in which the energy transition progresses more gradually and physical climate pressures become more material. Using both IEA NZE and IEA STEPS enables Akenerji to examine materially different policy, market and energy-system futures rather than relying on a single projected pathway.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☑ NGFS scenarios framework, please specify :Below 2°C

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Policy

☑ Market

☑ Technology

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 1.6ºC - 1.9ºC

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025

☑ 2030

☑ 2050

(5.1.1.9) Driving forces in scenario

Finance and insurance

☑ Cost of capital

Stakeholder and customer demands

☑ Consumer attention to impact

☑ Impact of nature footprint on reputation

Regulators, legal and policy regimes

☑ Global regulation

☑ Level of action (from local to global)

☑ Global targets

Macro and microeconomy

☑ Domestic growth

☑ Globalizing markets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Akenerji used NGFS Below 2°C within its organization-wide low-emission scenario set. The assessment assumes earlier and progressively stronger climate-policy action, expansion of carbon-pricing mechanisms, growing renewable-energy deployment and increasing integration of climate considerations into financing and

investment decisions. A risk analysis based on the NGFS Below 2°C scenario estimated that Türkiye ETS allowance prices could be approximately USD 15/tCO2 in 2030 and USD 105–160/tCO2 in 2050. These scenario parameters were considered in assessing regulatory exposure, potential production-cost effects, electricity-market pricing, trading implications, financing conditions and the relative value of Akenerji's renewable and natural-gas generation assets. Key uncertainties include the timing and design of Türkiye's ETS, allowance allocation, future carbon-price development, market liquidity, carbon-cost pass-through, technological costs, financing criteria, electricity demand and energy-price volatility. The quantitative results are conditional on the scenario assumptions and do not represent forecasts. The scenario was applied together with IEA NZE and RCP2.6 to provide an integrated low-emission view of transition and physical climate risks.

(5.1.1.11) Rationale for choice of scenario

NGFS Below 2°C was selected because it provides a recognized framework for assessing climate-related financial and transition risks under an orderly, below-2°C pathway. It is relevant to Akenerji's assessment of carbon pricing, energy-market transformation, financing conditions and the long-term competitiveness of its generation portfolio. The scenario supports analysis of the possible financial implications of Türkiye's transition toward a carbon-pricing system and provides a consistent contrast with NGFS Current Policies. Its use alongside IEA and IPCC pathways allows transition, market and physical climate assumptions to be examined through complementary scenario sources.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☑ NGFS scenarios framework, please specify :Current Policies

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Acute physical
☑ Chronic physical
☑ Policy
☑ Market
☑ Technology

(5.1.1.6) Temperature alignment of scenario

Select from:
☑ 4.0ºC and above

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

Select all that apply
☑ 2025
☑ 2030
☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts
☑ Climate change (one of five drivers of nature change)

Finance and insurance
☑ Cost of capital

Stakeholder and customer demands
☑ Consumer attention to impact

Regulators, legal and policy regimes

☑ Global regulation

☑ Level of action (from local to global)

Macro and microeconomy

☑ Domestic growth

☑ Globalizing markets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Akenerji used NGFS Current Policies within its organization-wide high-emission scenario set. The assessment assumes limited additional climate-policy action, comparatively slow technological change, continued fossil-fuel dependence and stronger physical climate effects. A risk analysis based on NGFS Current Policies estimated that Türkiye ETS allowance prices could remain at approximately USD 15/tCO2 from 2030 onward. The assessment considered how relatively limited carbon-pricing development could reduce direct transition-cost pressure compared with the low-emission scenario while increasing exposure to chronic and acute physical risks. The analysis also considered natural-gas price volatility, energy-security concerns, financing conditions, electricity-market volatility, extreme heat, drought, water stress, changes in precipitation and wind regimes, wildfires, flooding, heavy precipitation and other site-level hazards. Key uncertainties include the future direction of climate policy, the timing of Türkiye's ETS, geopolitical energy-market developments, natural-gas availability, carbon-price formation, electricity-market conditions and the frequency and severity of physical climate hazards. Scenario outputs are conditional and are not treated as forecasts.

(5.1.1.11) Rationale for choice of scenario

NGFS Current Policies was selected to test Akenerji's resilience under a high-physical-risk pathway in which additional climate-policy action remains limited. This scenario is relevant because weaker mitigation may reduce some near-term transition pressures while increasing exposure to drought, water stress, extreme heat, wildfires, flooding and other physical hazards affecting generation assets and operational continuity. The scenario also supports assessment of energy-market volatility, natural-gas dependence, financing risk and the long-term resilience of generation and trading activities. It provides a direct contrast with NGFS Below 2°C and helps prevent strategic decisions from being based solely on an orderly transition pathway.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 2.6

(5.1.1.2) SSPs used in conjunction with scenario

Select from:

☑ SSP1

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Acute physical

☑ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 1.6°C - 1.9°C

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025

☑ 2030

☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Changes in ecosystem services provision

☑ Speed of change (to state of nature and/or ecosystem services)

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

☑ Other local ecosystem asset interactions, dependencies and impacts driving forces, please specify :Basin related impacts on company's hydroelectricty generation

Relevant technology and science

☑ Granularity of available data (from aggregated to local)

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Akenerji applied RCP2.6 within its organization-wide low-emission scenario set to assess acute and chronic physical climate risks. The analysis covered water stress and drought, extreme heat, changes in precipitation and wind regimes, wildfires, heavy rainfall, riverine flooding, flash floods and related site-access and infrastructure risks. For water-related analysis, Akenerji used WRI Aqueduct 4.0 and the optimistic SSP1-RCP2.6 pathway. Location-based screening covered all nine generation facilities and considered 2025, 2030 and 2050. Detailed financial modelling of drought exposure used historical HEPP production data and forecasts, translated projected changes in rainfall and water availability into potential production and revenue effects. For the four HEPPs exposed to extremely high water stress, the medium-term assessment indicated approximately 3% lower rainfall and a potential EBITDA effect of approximately 2.4%–3% by 2030. The long-term assessment indicated approximately 5% lower rainfall and a potential EBITDA effect of approximately 3.5%–4.4% by 2050. Key uncertainties include the spatial resolution of climate and hydrological data, differences between basin-level projections and individual facility conditions, future precipitation patterns, energy prices, the relationship between water flows and electricity generation, and the ability of other portfolio assets and electricity-market prices to offset lower hydroelectric output. WRI Aqueduct is used as a screening and prioritization tool and is supplemented by Akenerji's historical production and financial analysis.

(5.1.1.11) Rationale for choice of scenario

RCP2.6 was selected to examine physical climate risks under a lower-emission pathway and to provide a contrast with RCP8.5. The scenario is relevant because Akenerji's generation portfolio depends on climate-sensitive natural resources and is exposed to water stress, drought, precipitation variability, extreme heat, wind-regime changes, wildfires and flooding. The pathway supports location-based assessment of all generation facilities and more detailed quantification of drought-related effects at the HEPPs with the highest exposure. Its use allows Akenerji to assess whether material physical risks remain even under a comparatively favorable climate pathway and to consider these risks in production planning, valuation, sensitivity analysis and portfolio management.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 8.5

(5.1.1.2) SSPs used in conjunction with scenario

Select from:

☑ SSP5

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Acute physical

☑ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 4.0°C and above

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025

☑ 2030

☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Changes in ecosystem services provision

☑ Speed of change (to state of nature and/or ecosystem services)

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

☑ Other local ecosystem asset interactions, dependencies and impacts driving forces, please specify :Basin related impacts on company's hydroelectricty generation

Relevant technology and science

☑ Granularity of available data (from aggregated to local)

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Akenerji applied RCP8.5 within its organization-wide high-emission scenario set to assess chronic and acute physical climate risks under materially stronger warming and physical climate pressure. For water-related analysis, Akenerji used WRI Aqueduct 4.0 and its pessimistic SSP5-RCP8.5 pathway. Location-based screening covered all nine generation facilities and considered 2025, 2030 and 2050. The assessment examined water stress, drought, riverine flooding, extreme heat, precipitation variability, changes in wind regimes, wildfires, heavy rainfall, flash floods and related effects on generation, site access, supporting infrastructure, grid connections and operational continuity. For the four HEPPs exposed to extremely high water stress, the medium-term assessment indicated approximately 10% lower rainfall and a potential EBITDA effect of approximately 8%–10% by 2030. The long-term assessment indicated approximately 17% lower rainfall and a potential EBITDA effect of approximately 12%–15% by 2050. The analysis also considered potential effects on Erzin NGCCPP from extreme heat and other site-level physical hazards, together with possible changes in hydroelectric generation patterns across the portfolio. Key uncertainties include the spatial resolution of climate and hydrological projections, future rainfall and temperature patterns, the occurrence and severity of extreme events, energy prices, facility-level adaptation capacity, the

relationship between hydrological conditions and production, and the extent to which Akenerji's diversified generation and trading activities can offset physical production losses.

(5.1.1.11) Rationale for choice of scenario

RCP8.5 was selected to test Akenerji's resilience under a high-emission, high-physical-risk pathway. It provides a suitably challenging contrast to RCP2.6 and is relevant to Akenerji because physical climate hazards can affect hydroelectric generation, thermal-generation efficiency and cooling processes, wind generation, site access, supporting infrastructure and electricity-market positions. The scenario enables location-based identification of exposed facilities and quantification of potential drought-related production and financial effects over medium- and long-term horizons. Its inclusion ensures that Akenerji's physical-risk assessment is not limited to an orderly or low-emission transition pathway.

Water

(5.1.1.1) Scenario used

Water scenarios

☑ WRI Aqueduct

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Acute physical

☑ Chronic physical

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025

☑ 2030

☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Changes in ecosystem services provision

☑ Speed of change (to state of nature and/or ecosystem services)

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

☑ Other local ecosystem asset interactions, dependencies and impacts driving forces, please specify :Basin related impacts on company's hydroelectricty generation

Relevant technology and science

☑ Granularity of available data (from aggregated to local)

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Akenerji used the WRI Aqueduct 4.0 Water Risk Atlas to assess organization-wide water exposure under the pessimistic SSP5-RCP8.5 pathway. The location-based screening covered all nine generation facilities and evaluated water stress in 2025, 2030 and 2050, together with drought and riverine flood indicators. The scenario assumes materially stronger physical climate pressures, including higher temperatures, changing precipitation patterns, greater drought pressure and potential intensification of water-related operational constraints. The assessment identified continuing high or extremely high water-stress exposure across a material part of Akenerji's hydroelectric portfolio. It also considered potential effects on cooling and operational continuity at Erzin NGCCPP and the combined effects of heat and water stress. The screening was supplemented by historical HEPP production analysis and by financial modelling of potential production, revenue and EBITDA effects. Under the high-emission drought assessment, approximately 10% lower rainfall and an EBITDA effect of approximately 8%–10% were considered for 2030, while approximately 17% lower rainfall and an EBITDA effect of approximately 12%–15% were considered for 2050 for the four HEPP facilities exposed to extremely high water stress. Key uncertainties include global-to-local downscaling, basin-level hydrology, future rainfall and temperature, facility-level water availability, extreme-

event occurrence, energy prices and the effectiveness of operational and portfolio-level risk-management measures. Aqueduct results are used for screening and prioritization and do not constitute precise facility-level forecasts.

(5.1.1.11) Rationale for choice of scenario

The pessimistic WRI Aqueduct SSP5-RCP8.5 pathway was selected to assess Akenerji's water-related resilience under a high-emission future with stronger drought, heat and water-stress pressures. The pathway provides a suitable contrast to the optimistic water scenario and allows Akenerji to compare facility-level exposure across multiple future conditions. It is relevant to hydroelectric generation, thermal-plant cooling, operational continuity, production planning, electricity trading and long-term portfolio resilience. Using both optimistic and pessimistic WRI pathways supports a range-based assessment rather than reliance on a single water future and enables the facilities with the greatest exposure to be prioritized for financial modelling and risk management.

Water

(5.1.1.1) Scenario used

Water scenarios

☑ WWF Water Risk Filter

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Acute physical

☑ Chronic physical

☑ Reputation

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025

☑ 2030

☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Changes to the state of nature

☑ Changes in ecosystem services provision

☑ Speed of change (to state of nature and/or ecosystem services)

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

Finance and insurance

☑ Sensitivity of capital (to nature impacts and dependencies)

Stakeholder and customer demands

☑ Impact of nature footprint on reputation

Regulators, legal and policy regimes

☑ Global regulation

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Akenerji used the WWF Water Risk Filter as an additional organization-wide screening and scenario-analysis input for identifying and assessing physical water risks affecting its generation portfolio. The assessment complemented the more detailed location-based analysis conducted using WRI Aqueduct and considered how basin-level water risks may evolve over current, medium-term and long-term horizons. The WWF Water Risk Filter supports the assessment of physical water risks, including water scarcity, flooding, and ecosystem-service conditions, together with relevant regulatory and reputational dimensions. Its scenario framework provides

forward-looking views for 2030 and 2050 under alternative climate and socioeconomic pathways. The WWF assessment was used primarily for risk screening, comparison and prioritization rather than as a standalone facility-level financial model. Quantified production and financial effects were assessed separately using WRI Aqueduct outputs, climate projections, historical HEPP generation data and Akenerji's internal financial methodology. Key uncertainties include the spatial resolution of global basin-level datasets, differences between basin conditions and individual facility circumstances, future precipitation patterns, regulatory developments and the extent to which global scenario indicators reflect local hydrological conditions. The results are therefore interpreted together with facility-level data, operational experience and other scenario-analysis inputs.

(5.1.1.11) Rationale for choice of scenario

The WWF Water Risk Filter was selected to complement WRI Aqueduct by providing a broader assessment of basin-level and operational water risks. Its framework considers physical, regulatory and reputational dimensions and enables Akenerji to examine how water-related conditions may evolve under different future pathways. The tool is relevant to Akenerji because hydroelectric generation is directly affected by hydrological conditions, while water-related risks may also affect facility resilience, supporting infrastructure and operational continuity. Using WWF together with WRI Aqueduct reduces reliance on a single screening methodology and supports a more comprehensive assessment of water-related exposure across the generation portfolio. The WWF results informed risk identification and prioritization, while detailed quantitative production and financial analysis was conducted using facility-level information, WRI Aqueduct outputs, climate projections and historical generation data.
[Add row]

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

Climate change

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

Select all that apply

☑ Risk and opportunities identification, assessment and management

☑ Strategy and financial planning

☑ Resilience of business model and strategy

☑ Capacity building

☑ Target setting and transition planning

(5.1.2.2) Coverage of analysis

Select from:

☑ Organization-wide

(5.1.2.3) Summarize the influence of the scenario analysis on the selected business processes

Akenerji used organization-wide scenario analysis to identify, assess and prioritize climate-related risks and opportunities and evaluate the resilience of its generation, electricity trading and financing activities. The analysis combined a low-emission set comprising IEA NZE, NGFS Below 2°C and RCP2.6 with a high-emission set comprising IEA STEPS, NGFS Current Policies and RCP8.5. It considered short-term (0–2 years), medium-term (2–5 years) and long-term (5–20 years) effects, with quantitative analysis using 2025, 2030 and 2050 time points. The scenarios informed Akenerji's risk and opportunity inventory by assessing the likelihood and magnitude of transition and physical risks under different climate conditions. Transition risks included carbon pricing, regulatory and reporting obligations, natural-gas and electricity-market volatility, technology, financing conditions and stakeholder expectations. Physical risks included water stress, drought, extreme heat, changes in precipitation and wind regimes, wildfires, flooding, heavy rainfall and flash floods. Risks and opportunities were scored using EBITDA-based financial thresholds, considering existing controls and residual exposure. For strategy and financial planning, Akenerji considered how carbon prices could affect Erzin NGCCPP production costs, electricity prices, trading margins and the relative economic value of hydroelectric and wind assets. The analysis also assessed how climate performance, emissions intensity and the resilience of carbon-intensive assets could affect financing costs and access to capital. Scenario-based Türkiye ETS and EU ETS carbon-price assumptions for 2030 and 2050 were used to assess potential financial exposure. Physical-risk analysis used historical HEPP production data and translated projected rainfall changes into potential production, revenue and EBITDA effects. Under RCP2.6, rainfall was projected to decrease by approximately 3% by 2030 and 5% by 2050. For the four HEPPs exposed to extremely high water stress, the corresponding potential EBITDA effects were assessed at approximately 2.4%–3% by 2030 and 3.5%–4.4% by 2050. Under RCP8.5, rainfall was projected to decrease by approximately 10% by 2030 and 17% by 2050, with potential EBITDA effects of approximately 8%–10% and 12%–15%, respectively. The analysis showed that Akenerji's diversified natural-gas, hydroelectric and wind portfolio, together with electricity trading activities, provides some flexibility to manage generation volatility. Lower hydroelectric output may be partly balanced by Erzin NGCCPP, other generation assets and market activities. However, this capacity may be insufficient during widespread or prolonged drought, and the financial effect may not be fully offset. The analysis also identified possible effects from extreme heat and water stress at Erzin NGCCPP, changes in hydroelectric and wind generation patterns, and temporary disruption caused by wildfires, floods and other extreme events. These findings support continued consideration of climate resilience, generation forecasting, renewable-energy capacity, energy efficiency, portfolio diversification and production optimization in strategic and transition planning. The scenario-analysis process also strengthened internal capacity by bringing together multidisciplinary inputs from risk management, finance, generation, trading and sustainability functions and by expanding the use of scenario-based carbon-price and physical-risk analysis. The results provide inputs to the annual review of climate-related targets and to the development of Akenerji's transition-planning framework, including the consideration of renewable-energy capacity, energy efficiency, portfolio diversification and operational resilience. The analysis does not indicate that Akenerji is unaffected under all scenarios. Material residual exposure remains, particularly in relation to drought, water stress, carbon pricing, and the physical resilience of generation assets. Climate-related risks, opportunities and assumptions are reviewed annually and updated in response to material regulatory, market, climate and operational developments.

Water

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

Select all that apply

☑ Risk and opportunities identification, assessment and management

☑ Strategy and financial planning

☑ Resilience of business model and strategy

☑ Capacity building

☑ Target setting and transition planning

(5.1.2.2) Coverage of analysis

Select from:

☑ Organization-wide

(5.1.2.3) Summarize the influence of the scenario analysis on the selected business processes

Akenerji used organization-wide water scenario analysis to identify and prioritize water-related physical risks, assess potential production and financial effects and evaluate the resilience of its generation portfolio under different future water conditions. The assessment used WRI Aqueduct 4.0 and considered the optimistic SSP1-RCP2.6 and pessimistic SSP5-RCP8.5 pathways. Location-based screening covered all nine generation facilities and assessed water stress for 2025, 2030 and 2050, together with drought and riverine flood indicators. The WWF Water Risk Filter complemented this assessment by providing additional insight into basin-level physical, regulatory and reputational water risks under alternative future pathways. The screening was used to compare exposure across facilities and identify locations requiring more detailed analysis. Based on installed capacity, 25.6% of Akenerji's generation portfolio was located in areas with high or extremely high water stress, while 74.4% was located in areas with low or low-medium water stress. Six HEPPs representing 285 MW, or 23.3% of total installed capacity, were exposed to high or extremely high water stress. Feke I, Feke II, Gökkaya and Himmetli HEPPs, representing 157 MW or 12.8% of total installed capacity, were exposed to extremely high baseline water stress. The WRI screening was supplemented by an analysis of historical HEPP generation data, which showed the sensitivity of hydroelectric generation to rainfall and hydrological variability. The analysis translated projected rainfall and water-flow changes into potential production, revenue and EBITDA effects. Under RCP2.6, approximately 3% lower rainfall and a potential EBITDA effect of approximately 2.4%–3% were assessed for 2030 for the four HEPPs exposed to extremely high water stress. By 2050, approximately 5% lower rainfall and a potential EBITDA effect of approximately 3.5%–4.4% were assessed. Under RCP8.5, approximately 10% lower rainfall and a potential EBITDA effect of approximately 8%–10% were assessed for 2030. By 2050, approximately 17% lower rainfall and a potential EBITDA effect of approximately 12%–15% were assessed. The results were used in risk prioritization, asset valuation and sensitivity analysis. Hydrological variability was also considered in production forecasting, electricity-price projections and portfolio-balancing decisions. Lower hydroelectric production may increase reliance on Erzin NGCCPP, other generation assets or electricity-market purchases and may cause deviations in production and trading positions. The analysis showed that Akenerji's diversified generation portfolio and electricity trading activities can partly mitigate water-related production volatility. However, during widespread or prolonged drought, other assets and market activities may be insufficient to compensate fully for lower hydroelectric generation. Higher electricity prices during dry periods may partially offset lost revenue. The analysis supports the consideration of hydrological conditions in production planning, asset valuation, sensitivity analysis, portfolio optimization and operational risk management. WRI Aqueduct and the WWF Water Risk Filter are used as complementary screening and prioritization tools rather than precise facility-level forecasts. Key uncertainties include data resolution, basin and facility conditions, future rainfall, energy prices and the extent to which other assets and market activities can offset lower hydroelectric output.
[Fixed row]

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

(5.2.1) Transition plan

Select from:

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

(5.2.3) Publicly available climate transition plan

Select from:

☑ Yes

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

Select from:

☑ No, but we plan to add an explicit commitment within the next two years

(5.2.6) Explain why your organization does not explicitly commit to cease all spending on and revenue generation from activities that contribute to fossil fuel expansion

Akenerji has not yet made an explicit commitment to cease all spending on, and revenue generation from, activities that may contribute to fossil-fuel expansion. The company operates a diversified generation portfolio in which Erzin NGCCPP continues to play an important role in electricity supply security, portfolio balancing and operational flexibility. Accordingly, decisions concerning the long-term role of the company's generation assets need to consider energy-market conditions, security of supply, regulatory developments and the evolution of Türkiye's carbon-pricing framework. At the same time, Akenerji's climate transition plan supports the objectives of the Paris Agreement and focuses on strengthening the low-carbon component of its generation portfolio. The company's implementation approach includes renewable-energy and hybrid-generation projects, energy-efficiency improvements, operational optimization, internal carbon pricing and the integration of climate-related risks and opportunities into strategic and financial assessments. During the reporting year, Akenerji expanded its organization-wide scenario analysis and assessed the implications of low- and high-emission pathways for its generation portfolio. A shadow carbon-price range of USD 20–30 per metric tonne of CO2e was used in the assessment of climate-related risks and opportunities. These analyses support the evaluation of the future emissions profile, competitiveness and resilience of the company's generation assets. Akenerji plans to assess and formalize the scope of an explicit fossil-fuel expansion commitment within the next two years. This assessment will consider the long-term role of Erzin NGCCPP, the development of Türkiye's Emissions Trading System, security of electricity supply, the availability of technically and commercially viable low-carbon alternatives, and the company's objective of strengthening its renewable and low-carbon generation portfolio. Until this assessment is completed, Akenerji will continue to transparently disclose its generation mix, greenhouse gas emissions, climate-related risks and opportunities, internal carbon-pricing approach and progress in renewable-energy and operational-efficiency activities.

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

Select from:

☑ We do not have a feedback mechanism in place, but we plan to introduce one within the next two years

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

Akenerji's climate transition plan is informed by organization-wide scenario analysis and relies on assumptions concerning climate policy, carbon pricing, energy markets, technology, financing, security of electricity supply and physical climate impacts. The company assesses an optimistic set comprising IEA NZE, NGFS Below 2°C and RCP2.6, and a pessimistic set comprising IEA STEPS, NGFS Current Policies and RCP8.5. These scenarios examine how different transition speeds, carbon prices and physical climate conditions may affect generation volumes, costs, revenues, asset values, financing conditions and portfolio resilience over short, medium and long-term horizons. A key assumption is that the transition toward a lower-carbon electricity system will continue through renewable-energy deployment, stronger climate regulation and carbon-pricing mechanisms. Akenerji therefore aims to strengthen the low-carbon component of its portfolio through renewable-energy and hybrid-generation opportunities, energy efficiency and operational optimization. The plan assumes that Türkiye's climate-policy framework will continue to develop in line with the Paris Agreement, Türkiye's Nationally Determined Contribution and its national net-zero objective. During the reporting year, a USD 20–30 per metric tonne of CO2e shadow-price range was used to assess climate-related risks and opportunities. Implementation depends on access to financing, supportive regulation, permits, grid conditions and commercially viable low-carbon solutions. Natural-gas and electricity prices, carbon-market developments and energy demand may affect the timing and feasibility of actions. Physical climate conditions are also material because hydroelectric generation depends on precipitation and hydrological conditions. The assumptions and scenario results are reviewed annually and may be updated in response to regulatory, market, technological and climate developments.

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

During 2025, Akenerji advanced the implementation of its climate transition plan through governance, target-setting, renewable-energy development, emissions management, internal carbon pricing and climate-risk integration. The Sustainability Policy was revised to reflect national and international requirements, including the TSRS, while the roles and responsibilities of the Sustainability Committee were defined. Climate-related risks and opportunities were reassessed based on aaligned approach with the Enterprise Risk Management framework, and organization-wide scenario analysis was expanded to include NGFS Below 2°C, IEA NZE and IPCC RCP2.6 pathways alongside higher-emission scenarios. The results were integrated into risk prioritization, strategic assessment, asset valuation and financial sensitivity analysis. During 2025, Akenerji advanced its hybrid solar initiatives within its generation portfolio. The company continued feasibility studies for a hybrid solar project at Burç Bendi HEPP and completed the feasibility, contracting and tender processes for the 7.79 MW hybrid solar project at Erzin NGCCPP. These activities support renewable-energy integration, operational efficiency and the continued development of Akenerji's low-carbon generation portfolio. During the reporting year, Akenerji used a USD 20–30 per metric tonne of CO2e shadow-price range in the assessment of climate-related risks and opportunities. Broader integration of the mechanism into relevant decision-making processes is planned from 2026. Progress against the 2030 Scope 1 vehicle-emissions target was monitored, with vehicle-related emissions recorded at 114.3 tCO2e in 2025, remaining below the 2021 base-year level of 226.14 tCO2e. At the organizational level, Akenerji's total Scope 1 emissions were 1,291,792.3 tCO2e and total Scope 2 emissions were 13,713.3 tCO2e in 2025. Scope 1 and Scope 2 emissions continued to be calculated in line with the GHG Protocol, and the greenhouse gas inventory data were subject to independent verification under ISO 14064. Akenerji also strengthened the integration of physical climate risks into production planning and portfolio resilience through water-risk screening, historical generation analysis and scenario-based financial assessment. Climate-related risks, opportunities, assumptions and indicators continue to be reviewed annually through the company's sustainability governance and enterprise risk-management processes.

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

akenerji_2025_IAR.pdf

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

Select all that apply

☑ Water

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

Water is considered through Akenerji's assessment of drought, water stress and changing precipitation patterns affecting hydroelectric generation. WRI Aqueduct, the WWF Water Risk Filter, historical generation data and physical climate scenarios are used to inform risk prioritization, production planning, asset valuation and portfolio resilience.

(5.2.18) Adaptation-specific objectives included within your climate transition plan

Select from:

☑ Yes

(5.2.19) Describe the adaptation objectives included in your climate transition plan or standalone adaptation plan

Akenerji's climate transition plan includes adaptation objectives aimed at strengthening the resilience of generation assets, operational continuity and the diversified generation portfolio against physical climate risks. Water stress, drought, changing precipitation patterns and extreme weather events are assessed across short-, medium- and long-term horizons through organization-wide scenario analysis using IPCC pathways, WRI Aqueduct and the WWF Water Risk Filter. IEA and NGFS scenarios complement this assessment by considering the interaction between physical and transition risks. The analysis informs risk prioritization, generation planning, asset valuation, financial sensitivity analysis, business continuity and portfolio optimization. Particular attention is given to Feke I, Feke II, Gökkaya and Himmetli HEPPs, which are exposed to extremely high baseline water stress. Historical generation data and forward-looking climate projections are used to assess the potential effects of changing precipitation and water availability on generation, revenue and EBITDA. Adaptation measures include monitoring hydrological and meteorological conditions, incorporating climate scenarios into production forecasts, maintaining a diversified generation portfolio, using electricity-trading capabilities to manage generation variability, strengthening operational flexibility and regularly updating climate-risk assessments and action plans. The analysis recognizes that portfolio diversification may only partially offset the effects of widespread or prolonged drought. These objectives support electricity supply security, financial resilience and continuity of generation under changing climate conditions. Progress is reviewed annually through Akenerji's sustainability governance and risk-management processes, and adaptation priorities may be updated in response to physical climate indicators, operational performance and scenario results. The adaptation objectives and their supporting analysis are disclosed through Akenerji's publicly available Integrated Annual Report and TSRS-compliant Sustainability Report. [Fixed row]

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

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

Select from:

☑ Yes, both strategy and financial planning

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

Select all that apply

☑ Products and services

☑ Upstream/downstream value chain

☑ Investment in R&D

☑ Operations

[Fixed row]

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

Products and services

(5.3.1.1) Effect type

Select all that apply

☑ Physical risks

☑ Transition risks

☑ Opportunities

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

Select all that apply

☑ Climate change

☑ Water

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

Climate- and water-related risks and opportunities have affected Akenerji's products and services strategy by increasing the importance of renewable electricity generation, energy management, portfolio optimization, carbon-market activities and electricity trading. Carbon pricing and the transition toward lower-emission electricity generation may strengthen the relative economic position of Akenerji's HEPP and wind generation assets, while increasing the transition-risk exposure of Erzin NGCCPP through potential effects on production costs, operating margins and asset competitiveness. Akenerji therefore considers carbon-price developments, natural-gas prices, electricity prices and renewable-generation expectations when managing its generation and trading activities. The company aims to strengthen its renewable-energy portfolio and provides energy-management and optimization solutions that support customers in improving energy efficiency and managing costs. Physical climate and water risks may affect the volume, timing and predictability of renewable electricity available for sale. Drought and changing precipitation patterns may reduce HEPP generation, while changes in wind regimes may affect Ayyıldız WPP output. These effects may create deviations between forecast and actual generation, increasing the need for market purchases and portfolio balancing. Akenerji's diversified generation portfolio and electricity-trading capabilities provide flexibility to respond to changing generation and market conditions. However, widespread or prolonged physical impacts may not be fully offset. These considerations have reinforced the strategic importance of generation forecasting, renewable-energy diversification, active electricity-market participation and the integrated management of generation and trading activities.

Upstream/downstream value chain

(5.3.1.1) Effect type

Select all that apply

☑ Transition risks

☑ Opportunities

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

Select all that apply

☑ Climate change

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

Climate-related transition risks and opportunities have affected Akenerji's upstream and downstream value-chain strategy through natural-gas procurement, supplier management and developments in domestic and international energy and carbon markets. Upstream exposure is primarily associated with the availability and price of natural gas used at Erzin NGCCPP. Geopolitical developments, supply conditions and energy-market volatility may affect natural-gas costs, generation margins and liquidity requirements. Akenerji therefore considers fuel supply conditions, natural-gas prices, electricity prices and market developments when planning generation and managing its portfolio. Environmental and social considerations are also incorporated into supplier evaluation and responsible procurement processes. In the downstream value chain, the transition to a low-carbon economy is increasing the strategic importance of renewable electricity and lower-emission generation. This trend supports the value of Akenerji's renewable portfolio and creates opportunities associated with electricity and carbon-market activities. Akenerji's electricity-

trading capabilities also support the management of generation variability and enable the company to respond effectively to changing market and regulatory conditions. These risks and opportunities have reinforced a value-chain strategy focused on supply reliability, responsible supplier management, market diversification and effective participation in electricity and carbon markets. Akenerji continues to monitor regulatory developments, carbon markets and energy-market conditions to maintain the competitiveness and resilience of its generation and trading activities.

Investment in R&D

(5.3.1.1) Effect type

Select all that apply

☑ Transition risks

☑ Opportunities

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

Select all that apply

☑ Climate change

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

Climate-related transition risks and opportunities have affected Akenerji's approach to low-carbon technology development and deployment. Although the company does not operate a dedicated in-house R&D center, it allocates resources to the assessment, adaptation and implementation of renewable-energy, hybrid-generation, digitalization and energy-efficiency technologies. The transition toward a low-carbon energy system, emerging carbon-pricing mechanisms and the increasing strategic importance of renewable generation influence the technologies and projects evaluated by Akenerji. During the reporting period, relevant activities included the continued development and deployment of solar-supported hybrid generation solutions and feasibility studies for additional hybrid capacity. Akenerji's approach focuses on applying technologies that have reached an appropriate level of technical and commercial maturity. These activities support operational efficiency, strengthen the renewable-energy portfolio and contribute to the management of transition risks and low-carbon opportunities.

Operations

(5.3.1.1) Effect type

Select all that apply

☑ Physical risks

☑ Transition risks

☑ Opportunities

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

Select all that apply

☑ Climate change

☑ Water

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

Climate- and water-related risks and opportunities have affected Akenerji's operations strategy by increasing the importance of portfolio diversification, operational efficiency, generation forecasting, facility resilience and integrated production and trading management. These considerations are assessed across the company's short-term (0–2 years), medium-term (2–5 years) and long-term (5–20 years) horizons. Drought, water stress and changing precipitation patterns may affect water availability and generation across Akenerji's HEPP portfolio. Climate change may also increase the frequency or severity of extreme weather events, creating potential implications for facility resilience and operational continuity. Historical generation data and forward-looking climate projections are used to evaluate potential operational and financial effects. Erzin NGCCPP is primarily exposed to transition risks, particularly the potential effects of carbon pricing and emissions-trading regulation on production costs, operating margins and asset competitiveness. Scenario-based carbon-price assumptions for 2030 and 2050 were considered when assessing potential implications for generation costs, electricity prices and financial performance. Natural-gas price volatility and regulatory developments are also monitored as part of production and portfolio-management decisions. These risks and opportunities have reinforced Akenerji's strategy of maintaining a diversified generation portfolio supported by electricity-trading capabilities. Production planning and trading positions are managed by considering hydrological conditions, expected generation, natural-gas prices and electricity-market conditions. The company's operational strategy also emphasizes efficiency improvements, technology upgrades, asset monitoring, business continuity and the strengthening of its renewable-energy portfolio. Lower HEPP generation may be partly balanced through Erzin NGCCPP, other generation assets or electricity-market purchases. However, portfolio flexibility may not fully offset the effects of widespread or prolonged drought. Akenerji therefore incorporates physical and transition risks into operational risk management, production planning, sensitivity analysis, asset valuation and portfolio optimization.
[Add row]

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

Row 1

(5.3.2.1) Financial planning elements that have been affected

Select all that apply

☑ Assets

☑ Capital expenditures

☑ Revenues
☑ Direct costs
☑ Indirect costs
☑ Access to capital

(5.3.2.2) Effect type

Select all that apply
☑ Physical risks
☑ Transition risks
☑ Opportunities

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

Select all that apply
☑ Climate change
☑ Water

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

Climate- and water-related risks and opportunities affect Akenerji's financial planning through their implications for revenues, direct and indirect costs, capital expenditures, access to capital and asset values across short-term (0–2 years), medium-term (2–5 years) and long-term (5–20 years) horizons. Physical risks, particularly drought, water stress and changing precipitation patterns, may reduce HEPP generation volumes and related revenues. Historical generation data and forward-looking climate projections are used to assess potential production and financial effects. The results are evaluated against EBITDA-based financial thresholds and incorporated into asset valuation and sensitivity analysis. Lower HEPP generation may also increase direct costs by creating a need for alternative generation or electricity-market purchases to balance the portfolio. Transition risks primarily affect Erzin NGCCPP through potential carbon-pricing and emissions-trading costs, natural-gas price volatility and regulatory developments. Scenario-based carbon-price assumptions for 2030 and 2050 are used to assess potential effects on generation costs, electricity prices, operating margins and asset competitiveness. Climate-related reporting, monitoring, maintenance and resilience activities may also affect indirect costs. Climate-related opportunities are considered in investment planning, including renewable-energy and hybrid-generation projects, technology upgrades, energy-efficiency improvements and operational-resilience measures. The transition to a low-carbon economy may strengthen the relative economic position of Akenerji's renewable generation assets and support revenues from renewable electricity, electricity trading, carbon-market activities and energy-management services. Access to capital may also be affected as financing institutions increasingly consider emissions intensity, climate resilience and transition preparedness in lending and investment decisions. Akenerji therefore considers climate-related risks and opportunities in financial assessments, investment planning,

asset valuation and portfolio management. The company's diversified generation portfolio and trading capabilities provide some financial flexibility, although widespread or prolonged physical impacts and significant transition costs may not be fully offset.
[Add row]

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

	Identification of spending/revenue that is aligned with your organization's climate transition
	Select from: ☑ No, but we plan to in the next two years

[Fixed row]

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

(5.5.1) Investment in low-carbon R&D

Select from:
☑ Yes

(5.5.2) Comment

Akenerji does not operate a dedicated in-house R&D center. However, the company supports the development and implementation of low-carbon products and services through investments in renewable energy, hybrid generation, digitalization, energy efficiency and operational optimization. Rather than undertaking primary research activities, Akenerji focuses on assessing, adapting and deploying technologies that have reached an appropriate level of technical and commercial maturity in the energy sector. During the reporting period, Akenerji continued to allocate resources to renewable and hybrid generation projects. The company completed the second phase of the solar auxiliary source capacity at the Konya Biomass Power Plant, continued feasibility studies for a hybrid solar project at Burç Bendi HEPP,

and completed the feasibility, contract and tender processes for the 7.79 MW hybrid solar power project at Erzin NGCCPP. These initiatives support the company's objective of strengthening its renewable-energy portfolio, improving operational efficiency and reducing the carbon intensity of its generation activities. Akenerji also applies digital solutions, technology upgrades and efficiency-focused practices to improve asset performance, generation forecasting, operational continuity and portfolio optimization. These activities support the company's adaptation to the low-carbon energy transition and its management of risks arising from evolving climate policies, carbon-pricing mechanisms and changing electricity-market conditions. Accordingly, Akenerji's low-carbon R&D approach is primarily based on the practical application and deployment of innovative technologies through investment and operational improvement processes, rather than on separately structured in-house research activities.
[Fixed row]

(5.5.7) Provide details of your organization's investments in low-carbon R&D for your sector activities over the last three years.

Row 1

(5.5.7.1) Technology area

Select from:
☑ Solar energy generation

(5.5.7.2) Stage of development in the reporting year

Select from:
☑ Large scale commercial deployment

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

1

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

1

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

1

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

Akenerji's low-carbon technology activities focus on the assessment, adaptation and commercial deployment of renewable-energy and hybrid-generation solutions rather than basic research conducted through a dedicated in-house R&D center. Over the last three years, the company has directed its low-carbon technology development activities toward solar, hydroelectric, wind and hybrid-generation applications, together with supporting energy-efficiency and digital solutions. During the reporting year, Akenerji completed the second phase of the solar auxiliary source capacity at the Konya Biomass Power Plant, continued feasibility studies for a hybrid solar project at Burç Bendi HEPP, and completed the feasibility, contracting and tender processes for the 7.79 MW hybrid solar project at Erzin NGCCPP. The Erzin project is designed to meet part of the plant's internal electricity consumption from renewable sources, improve operational efficiency and support the company's low-carbon generation objectives. These activities also contribute to strengthening Akenerji's renewable-energy portfolio and managing transition risks arising from carbon pricing, climate regulation and evolving electricity-market conditions. Akenerji does not maintain a separate conventional R&D center or undertake basic academic research. Relevant expenditure is managed primarily through feasibility, project development, investment and operational improvement budgets. The percentages reported therefore represent the allocation of activities internally identified as low-carbon R&D and technology development, rather than the share of Akenerji's total capital expenditure.
[Add row]

(5.7) Break down, by source, your organization's CAPEX in the reporting year and CAPEX planned over the next 5 years.

Coal – Hard

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Akenerji does not operate or have approved investments in this energy source; therefore, no related CAPEX is reported.

Coal - Brown

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Akenerji does not operate or have approved investments in this energy source; therefore, no related CAPEX is reported.

Oil

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Akenerji does not operate or have approved investments in this energy source; therefore, no related CAPEX is reported.

Gas

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

1

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

1

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

1

(5.7.4) Most recent year in which a new power plant using this source was approved for development

2014

(5.7.5) Explain your CAPEX calculations, including any assumptions

Akenerji does not disclose absolute CAPEX or OPEX figures but provides detailed information on the direction of capital allocation and the assumptions guiding investment planning. In the reporting year, capital expenditure was directed towards renewable expansion, hybridisation of existing assets, and efficiency improvements. Key projects include a 6.2 MW capacity increase at Ayyıldız Wind Power Plant (raising total installed capacity to 34.4 MW), a 7.8 MW hybrid solar project at the Erzin NGCCPP, hybridisation studies for Burç Bendi HPP. Smaller-scale projects such as an 11 MW biomass facility in Konya and a 2.17 MW pyrolysis

plant in Sungurlu also form part of the portfolio. Looking ahead, the next five years of CAPEX are assumed to continue prioritising renewable generation, hybrid systems, and technologies that lower portfolio carbon intensity. The main calculation principle in CAPEX planning is to ensure resilience against carbon pricing mechanisms (e.g., Turkish ETS) while maintaining competitiveness in electricity markets. Financial assumptions incorporate expected carbon prices, potential increases in interest rates, and the need for long-term, cost-effective project financing. The company anticipates using a mix of external funding sources, including credit limit increases and project finance structures, to support its renewable pipeline. In this context, CAPEX allocation by source is expected to remain focused primarily on wind, solar, hydro, and biomass investments, while fossil-based expenditure will decline steadily. The trend signals a strategic alignment of investments with Akenerji's long-term decarbonisation roadmap, ensuring flexibility in adapting to climate-related risks and opportunities.

Sustainable biomass

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Akenerji does not operate or have approved investments in this energy source; therefore, no related CAPEX is reported.

Other biomass

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Akenerji does not operate or have approved investments in this energy source; therefore, no related CAPEX is reported.

Waste (non-biomass)

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Akenerji does not operate or have approved investments in this energy source; therefore, no related CAPEX is reported.

Nuclear

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Akenerji does not operate or have approved investments in this energy source; therefore, no related CAPEX is reported.

Geothermal

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Akenerji does not operate or have approved investments in this energy source; therefore, no related CAPEX is reported.

Ocean thermal

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Akenerji does not operate or have approved investments in this energy source; therefore, no related CAPEX is reported.

Hydropower

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

1

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

1

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

1

(5.7.4) Most recent year in which a new power plant using this source was approved for development

2010

(5.7.5) Explain your CAPEX calculations, including any assumptions

Akenerji does not disclose absolute CAPEX or OPEX figures but provides detailed information on the direction of capital allocation and the assumptions guiding investment planning. In the reporting year, capital expenditure was directed towards renewable expansion, hybridisation of existing assets, and efficiency improvements. Key projects include a 6.2 MW capacity increase at Ayyıldız Wind Power Plant (raising total installed capacity to 34.4 MW), a 7.8 MW hybrid solar project at the Erzin NGCCPP, hybridisation studies for Burç Bendi HPP. Smaller-scale projects such as an 11 MW biomass facility in Konya and a 2.17 MW pyrolysis plant in Sungurlu also form part of the portfolio. Looking ahead, the next five years of CAPEX are assumed to continue prioritising renewable generation, hybrid systems, and technologies that lower portfolio carbon intensity. The main calculation principle in CAPEX planning is to ensure resilience against carbon pricing mechanisms (e.g., Turkish ETS) while maintaining competitiveness in electricity markets. Financial assumptions incorporate expected carbon prices, potential increases in interest rates, and the need for long-term, cost-effective project financing. The company anticipates using a mix of external funding sources, including credit limit increases and project finance structures, to support its renewable pipeline. In this context, CAPEX allocation by source is expected to remain focused primarily on wind, solar, hydro, and biomass investments, while fossil-based expenditure will decline steadily. The trend signals a strategic alignment of investments with Akenerji's long-term decarbonisation roadmap, ensuring flexibility in adapting to climate-related risks and opportunities.

Onshore wind

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

1

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

1

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

1

(5.7.4) Most recent year in which a new power plant using this source was approved for development

2009

(5.7.5) Explain your CAPEX calculations, including any assumptions

Akenerji does not disclose absolute CAPEX or OPEX figures but provides detailed information on the direction of capital allocation and the assumptions guiding investment planning. In the reporting year, capital expenditure was directed towards renewable expansion, hybridisation of existing assets, and efficiency improvements. Key projects include a 6.2 MW capacity increase at Ayyıldız Wind Power Plant (raising total installed capacity to 34.4 MW), a 7.8 MW hybrid solar project at the Erzin NGCCPP, hybridisation studies for Burç Bendi HPP. Smaller-scale projects such as an 11 MW biomass facility in Konya and a 2.17 MW pyrolysis plant in Sungurlu also form part of the portfolio. Looking ahead, the next five years of CAPEX are assumed to continue prioritising renewable generation, hybrid systems, and technologies that lower portfolio carbon intensity. The main calculation principle in CAPEX planning is to ensure resilience against carbon pricing mechanisms (e.g., Turkish ETS) while maintaining competitiveness in electricity markets. Financial assumptions incorporate expected carbon prices, potential increases in interest rates, and the need for long-term, cost-effective project financing. The company anticipates using a mix of external funding sources, including credit limit increases and project finance structures, to support its renewable pipeline. In this context, CAPEX allocation by source is expected to remain focused primarily on wind, solar, hydro, and biomass investments, while fossil-based expenditure will decline steadily. The trend signals a strategic alignment of investments with Akenerji's long-term decarbonisation roadmap, ensuring flexibility in adapting to climate-related risks and opportunities.

Offshore wind

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Akenerji does not operate or have approved investments in this energy source; therefore, no related CAPEX is reported.

Solar

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Akenerji does not operate or have approved investments in this energy source; therefore, no related CAPEX is reported.

Wave

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Akenerji does not operate or have approved investments in this energy source; therefore, no related CAPEX is reported.

Tidal

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Akenerji does not operate or have approved investments in this energy source; therefore, no related CAPEX is reported.

Fossil-fuel plants fitted with CCS

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Akenerji does not operate or have approved investments in this energy source; therefore, no related CAPEX is reported.

Other renewable (e.g. renewable hydrogen)

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Akenerji does not operate or have approved investments in this energy source; therefore, no related CAPEX is reported.

Other non-renewable (e.g. non-renewable hydrogen)

(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)

0

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

0

(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years

0

(5.7.5) Explain your CAPEX calculations, including any assumptions

Akenerji does not operate or have approved investments in this energy source; therefore, no related CAPEX is reported.
[Fixed row]

(5.7.1) Break down your total planned CAPEX in your current CAPEX plan for products and services (e.g. smart grids, digitalization, etc.).

Row 1

(5.7.1.1) Products and services

Select from:
☑ Distributed generation

(5.7.1.2) Description of product/service

Akenerji's CAPEX plan included the development of hybrid solar generation at Erzin NGCCPP. During 2025, feasibility studies and the contracting and tender processes were completed for a solar power plant with an installed capacity of 7.792 MWp / 7.700 MWe. The project supports renewable-energy integration within Akenerji's existing generation portfolio, contributes to hybrid-generation capacity and enables more efficient use of existing site and grid infrastructure. As the facility was not operational during the 2025 reporting period, its effects on renewable electricity generation, internal electricity consumption, operational efficiency and greenhouse gas emissions will be calculated and disclosed in subsequent reporting periods.

(5.7.1.3) CAPEX planned for product/service

1

(5.7.1.4) Percentage of total CAPEX planned for products and services

1

(5.7.1.5) End year of CAPEX plan

2026
[Add row]

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

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

-35

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

305

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

-35

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

305

(5.9.5) Please explain

Power generation facilities pay an annual service fee to the General Directorate of State Hydraulic Works (DSİ), calculated based on the volume of electricity generated. The 2026 figures were calculated based on seven months of actual generation and five months of forecast generation. The figures for 2025 and 2024 represent finalized invoiced amounts. The main reason for the decrease between 2024 and 2025 was the reduction in generation volumes due to drought. In 2026, particularly as a result of the high precipitation recorded in February, March and April, the highest hydrological regime of the last ten years was observed, and this was directly reflected in electricity generation. When the total annual OPEX incurred by the power plants is assessed, this expenditure represents approximately 5% of total OPEX.
[Fixed row]

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

Carbon

(5.10.1) Use of internal pricing for this environmental externality

Select from:
☑ Yes

Water

(5.10.1) Use of internal pricing for this environmental externality

Select from:
☑ No, and we do not plan to in the next two years

(5.10.2) Primary reason for not pricing this environmental externality

Select from:
☑ Judged to be unimportant or not relevant

(5.10.3) Explain why your organization does not price this environmental externality

Akenerji does not currently apply an internal water price and does not plan to introduce one within the next two years. Water-related risks are managed through facility-level monitoring, independently verified water-footprint calculations, climate scenario analysis and operational risk management. The company's principal water-related exposure concerns the effects of drought and changing precipitation patterns on hydroelectric generation rather than the cost of water consumed as an operational input. In addition, Erzin NGCCPP, which accounts for most of the company's water withdrawal and consumption, primarily uses treated seawater in its operations. For these reasons, internal water pricing is not currently considered a relevant or effective mechanism for Akenerji's financial and operational decision-making.
[Fixed row]

(5.10.1) Provide details of your organization's internal price on carbon.

Row 1

(5.10.1.1) Type of pricing scheme

Select from:
☑ Shadow price

(5.10.1.2) Objectives for implementing internal price

Select all that apply
☑ Conduct cost-benefit analysis
☑ Drive low-carbon investment
☑ Identify and seize low-carbon opportunities
☑ Influence strategy and/or financial planning
☑ Setting and/or achieving of climate-related policies and targets

(5.10.1.3) Factors considered when determining the price

Select all that apply
☑ Alignment to international standards
☑ Alignment with the price of allowances under an Emissions Trading Scheme

☑ Existing or pending legislation

☑ Scenario analysis

(5.10.1.4) Calculation methodology and assumptions made in determining the price

Akenerji has adopted a forward-looking shadow carbon price to support the assessment of transition risks and the potential financial implications of future carbon-pricing regulations. The methodology considers the anticipated implementation of the Turkish Emissions Trading System, scenario-based carbon-price projections and the longer-term direction of allowance prices in the EU Emissions Trading System. During the reporting year, the USD 20–30 per metric tonne of CO2e shadow-price range was used in the assessment of climate-related risks and opportunities. Broader integration of the mechanism into relevant decision-making processes is planned from 2026. The methodology assumes that carbon prices in Türkiye may gradually increase as the domestic emissions-trading framework develops and becomes more closely aligned with European carbon-market conditions. The price range is primarily intended to evaluate the potential effects of carbon costs on Erzin NGCCPP, support climate-related financial assessments and inform strategic and portfolio-planning decisions. The assumptions underlying the shadow price will be reviewed periodically in light of developments in Turkish climate legislation, the implementation timetable and allocation rules of the Turkish ETS, relevant carbon-market prices and changes in Akenerji's operational and investment plans.

(5.10.1.5) Scopes covered

Select all that apply

☑ Scope 1

☑ Scope 2

(5.10.1.6) Pricing approach used – spatial variance

Select from:

☑ Differentiated

(5.10.1.7) Indicate how and why the price is differentiated

Akenerji applies a differentiated approach to reflect differences in the emissions profiles and regulatory exposure of the assets within its diversified generation portfolio. The potential effects of carbon pricing vary significantly between natural gas-based generation and renewable generation. A differentiated approach therefore provides a more representative basis for assessing carbon-related financial exposure across the portfolio. The internal carbon price is primarily relevant to Erzin NGCCPP, which is the principal source of Akenerji's Scope 1 emissions and the asset expected to be directly exposed to the Turkish Emissions Trading System. The potential financial effects of carbon pricing are therefore assessed mainly in relation to this asset. Akenerji's hydroelectric and wind assets have limited direct operational emissions and are not expected to face the same direct allowance costs. Their exposure is therefore assessed differently, while their contribution to portfolio resilience and the low-carbon transition is considered within strategic and opportunity assessments. This differentiated approach enables Akenerji to evaluate the implications of carbon pricing according to each asset's emissions profile and regulatory exposure, supporting risk management, financial assessment and portfolio-planning decisions.

(5.10.1.8) Pricing approach used – temporal variance

Select from:

☑ Evolutionary

(5.10.1.9) Indicate how you expect the price to change over time

Akenerji applies an evolutionary approach to its internal carbon price, recognizing that the applicable price signal will change as Türkiye's carbon-pricing framework develops and relevant carbon-market conditions evolve. The initial internal carbon-price range has been set at USD 20–30 per metric tonne of CO2e for application from 2026. The price is expected to be reviewed periodically in light of developments in the Turkish Emissions Trading System, including its implementation timetable, allocation rules and resulting market-price signals. Over the longer term, Akenerji expects the internal carbon price to increase gradually and move toward relevant European carbon-market price levels as Türkiye's carbon-pricing framework matures. The timing and scale of future adjustments have not been predetermined and will depend on regulatory developments, market conditions and updated scenario analyses.

(5.10.1.10) Minimum actual price used (currency per metric ton CO2e)

20

(5.10.1.11) Maximum actual price used (currency per metric ton CO2e)

30

(5.10.1.12) Business decision-making processes the internal price is applied to

Select all that apply

☑ Capital expenditure

☑ Operations

☑ Risk management

☑ Opportunity management

(5.10.1.13) Internal price is mandatory within business decision-making processes

Select from:

☑ Yes, for some decision-making processes, please specify :risk and opportunity management

(5.10.1.14) % total emissions in the reporting year in selected scopes this internal price covers

100

(5.10.1.15) Pricing approach is monitored and evaluated to achieve objectives

Select from:

☑ Yes

(5.10.1.16) Details of how the pricing approach is monitored and evaluated to achieve your objectives

Akenerji monitors and evaluates its internal carbon-pricing approach through its climate-risk assessment, scenario analysis, strategic planning and financial assessment processes. The approach supports the evaluation of potential carbon-related financial effects, particularly those associated with the anticipated implementation of the Turkish Emissions Trading System. During the reporting year, the USD 20–30 per metric tonne of CO2e shadow-price range was applied in the assessment of climate-related risks and opportunities, including scenario-based evaluations of potential carbon-related financial effects. The mechanism is planned to be integrated more broadly into decision-making processes from 2026. The assumptions underlying the internal carbon price are reviewed in light of developments in climate legislation, the implementation timetable and design of the Turkish ETS, relevant carbon-market price signals and their potential implications for Akenerji's generation portfolio. The effectiveness of the pricing approach is evaluated based on whether it provides decision-useful information for assessing transition risks, identifying low-carbon opportunities and supporting risk management, opportunity management and financial assessment. The internal carbon-price range and its application will be reviewed periodically as Türkiye's carbon-pricing framework develops and market conditions become clearer. Adjustments may be made to ensure that the price remains appropriate for evaluating carbon-related exposure and supporting Akenerji's low-carbon generation strategy.
[Add row]

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

Suppliers

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

☑ Yes

(5.11.2) Environmental issues covered

Select all that apply

☑ Climate change

☑ Water

Customers

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

☑ No, but we plan to within the next two years

(5.11.3) Primary reason for not engaging with this stakeholder on environmental issues

Select from:

☑ Other, please specify :The electricity market structure limits direct customer engagement.

(5.11.4) Explain why you do not engage with this stakeholder on environmental issues

Due to the structure of the electricity generation market, Akenerji has limited direct interaction with customers on environmental issues and therefore does not currently conduct a structured customer engagement program. Within the next two years, the company plans to assess appropriate engagement opportunities related to its energy trading activities and environmental products.

Investors and shareholders

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

☑ Yes

(5.11.2) Environmental issues covered

Select all that apply

☑ Climate change

☑ Water

Other value chain stakeholders

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

☑ No, but we plan to within the next two years

(5.11.3) Primary reason for not engaging with this stakeholder on environmental issues

Select from:

☑ Other, please specify :Relevant stakeholder groups and engagement mechanisms are being assessed.

(5.11.4) Explain why you do not engage with this stakeholder on environmental issues

Akenerji engages with public institutions, sector associations, local authorities and other stakeholders through its existing communication and consultation channels. However, a separate environmental engagement program for other value-chain stakeholders has not yet been formalized. The company plans to identify the relevant stakeholder groups, determine priority environmental topics and establish appropriate engagement mechanisms within the next two years.
[Fixed row]

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

	Assessment of supplier dependencies and/or impacts on the environment
Climate change	*Select from:* ☑ No, we do not currently assess the dependencies and/or impacts of our suppliers, but we plan to do so within the next two years
Water	*Select from:*

	Assessment of supplier dependencies and/or impacts on the environment
	☑ No, we do not currently assess the dependencies and/or impacts of our suppliers, but we plan to do so within the next two years

[Fixed row]

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

Climate change

(5.11.2.1) Supplier engagement prioritization on this environmental issue

Select from:

☑ No, we do not prioritize which suppliers to engage with on this environmental issue

(5.11.2.3) Primary reason for no supplier prioritization on this environmental issue

Select from:

☑ We engage with all suppliers

(5.11.2.4) Please explain

Akenerji does not currently prioritize individual suppliers for climate-related engagement because environmental and compliance expectations are applied across its supplier management processes. Suppliers are managed through the Supplier Selection and Evaluation Procedure, and environmental, ethical and legal requirements are incorporated into supplier selection, agreements and performance evaluations.

Water

(5.11.2.1) Supplier engagement prioritization on this environmental issue

Select from:

☑ No, we do not prioritize which suppliers to engage with on this environmental issue

(5.11.2.3) Primary reason for no supplier prioritization on this environmental issue

Select from:

☑ We engage with all suppliers

(5.11.2.4) Please explain

Akenerji does not currently prioritize individual suppliers for water-related engagement because environmental and compliance expectations are applied across its supplier management processes. Suppliers are managed through the Supplier Selection and Evaluation Procedure, and environmental and legal requirements are incorporated into supplier selection, agreements and performance evaluations.
[Fixed row]

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

Climate change

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

Select from:

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

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

Select from:

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

(5.11.5.3) Comment

Akenerji worked with 667 suppliers in 2025, of which 651 were local, corresponding to a local supplier ratio of 97%. Environmental, occupational health and safety, ethical and legal requirements are incorporated into supplier selection and contractual processes. Sustainable supply chain management is also identified as one of

Akenerji's material sustainability topics. During supplier selection, Akenerji considers relevant management-system certifications and requirements, including ISO 9001 Quality Management, ISO 14001 Environmental Management, ISO 45001 Occupational Health and Safety, ISO 50001 Energy Management, product responsibility, diversity and inclusion, and human rights criteria. Where suppliers do not comply with applicable environmental requirements, corrective actions may be requested. Cooperation may be terminated where negative environmental or social impacts are identified. Active suppliers are evaluated according to defined supplier performance parameters, including Quality Score, On-Time Delivery Score and Recipient Score. In 2025, no suppliers were classified as having low performance. Relevant feedback was provided to suppliers included in the "Suppliers Requiring Improvement" category.

Water

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

Select from:

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

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

Select from:

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

(5.11.5.3) Comment

During supplier selection, Akenerji considers relevant management-system certifications and requirements, including ISO 9001 Quality Management, ISO 14001 Environmental Management, ISO 45001 Occupational Health and Safety, ISO 50001 Energy Management, product responsibility, diversity and inclusion, and human rights criteria. Suppliers are expected to comply with the environmental, ethical, human rights, occupational health and safety, and legal requirements set out in procurement conditions, contracts, specifications and other documents governing supplier relationships. These requirements provide the framework for addressing relevant environmental matters, including water management where applicable. Where suppliers do not comply with applicable environmental requirements, corrective actions may be requested. Cooperation may be terminated where negative environmental or social impacts are identified. Supplier performance is also monitored through defined evaluation criteria, and feedback is provided to suppliers requiring improvement. In the previous reporting period, Akenerji used a Sustainability Supplier Evaluation Survey to support the assessment of selected suppliers. Akenerji plans to further develop its supplier assessment approach by incorporating more specific criteria relating to suppliers' water-related dependencies and impacts.
[Fixed row]

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

Climate change

(5.11.6.1) Environmental requirement

Select from:

☑ Compliance with an environmental certification, please specify :ISO 14001

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

☑ Certification

☑ Supplier scorecard or rating

☑ Supplier self-assessment

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

Select from:

☑ 76-99%

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

Select from:

☑ 76-99%

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

Select from:

☑ 100%

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

Select from:

☑ 100%

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

Select from:

☑ Retain and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:

☑ All suppliers compliant during the reporting period

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply

☑ Assessing the efficacy and efforts of non-compliant supplier actions through consistent and quantified metrics

(5.11.6.12) Comment

With the systemic improvements we carried out in 2025, we continued to work on automated structures that will accelerate procurement and enable employees to focus on more value-added work, and we commissioned the e-tender procurement portal in this vein. Akenerji requires all suppliers to comply with national environmental and climate-related regulations and encourages them to adopt internationally recognised standards such as ISO 14001. Within the purchasing process, specific attention is given to climate-related criteria, including measures to reduce greenhouse gas emissions, improve energy and water efficiency, and ensure responsible waste and material management. Compliance is monitored through contractual obligations, supplier self-assessments, and documentation reviews, supported by the requirement for valid permits and certifications. Periodic performance evaluations and audits are carried out to confirm alignment, while suppliers are encouraged to disclose data on carbon emissions and water use to strengthen transparency across the value chain. This is followed by compliance with the legislation and the Akenerji Sustainability Policy. These environmental requirements are incorporated into our supplier agreements.

Water

(5.11.6.1) Environmental requirement

Select from:

☑ Compliance with an environmental certification, please specify :ISO 14001

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

☑ Certification

☑ Supplier scorecard or rating

☑ Supplier self-assessment

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

Select from:

☑ 76-99%

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

Select from:

☑ 76-99%

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

Select from:

☑ Retain and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:

☑ All suppliers compliant during the reporting period

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply

☑ Assessing the efficacy and efforts of non-compliant supplier actions through consistent and quantified metrics

(5.11.6.12) Comment

In 2025 supplier selection process, we evaluated the existence of management systems such as ISO 9001 Quality, ISO 14001 Environment, ISO 45001 OHS, and ISO 50001 Energy, as well as criteria on product responsibility, diversity and inclusion, and human rights. Under ISO 14001, particular attention was given to water management practices, including the efficient use of water, treatment of wastewater, and compliance with local regulations. Corrective actions are requested from suppliers identified as not meeting basic environmental requirements, while cooperation is terminated with suppliers found to have negative environmental impacts. Supplier performance was assessed through the Supplier Performance Evaluation based on Quality Score, Deadline Compliance Score, and Receiver Score. We also expect suppliers to comply with the conditions outlined in procurement contracts, specifications, and related documents, together with requirements on business ethics, human rights (no child labour, forced labour, discrimination, or rights violations), OHS, and working conditions. To strengthen awareness of environmental, social, and governance issues, we continued supplier engagement programs and encouraged the integration of sustainability into business processes. To identify and monitor environmental and social impacts, including water-related practices, we implemented the Sustainability Supplier Evaluation Survey during the 2025 operating period.
[Add row]

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

Climate change

(5.11.7.2) Action driven by supplier engagement

Select from:
☑ Adoption of the United Nation’s International Labour Organization principles

(5.11.7.3) Type and details of engagement

Capacity building
☑ Provide training, support and best practices on how to mitigate environmental impact

Innovation and collaboration
☑ Collaborate with suppliers on innovations to reduce environmental impacts in products and services

(5.11.7.4) Upstream value chain coverage

Select all that apply
☑ Tier 1 suppliers

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

Select from:

☑ 76-99%

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

Select from:

☑ 100%

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

We expect our suppliers to comply with the rules written in the general conditions of procurement, contracts, specifications and other similar documents regulating our business relations with our suppliers, as well as the regulations on business ethics, human rights (no child labour, forced labour, discrimination, inequality, human rights violations, etc.), occupational health and safety and working conditions. We continued to raise awareness of environmental, social and governance factors with our suppliers to help them strengthen their business practices and integrate sustainability into their business processes. In order to identify and monitor these impacts of our suppliers, we implement regular Sustainability Supplier Evaluation Surveys

(5.11.7.10) Engagement is helping your tier 1 suppliers meet an environmental requirement related to this environmental issue

Select from:

☑ No, this engagement is unrelated to meeting an environmental requirement

(5.11.7.11) Engagement is helping your tier 1 suppliers engage with their own suppliers on the selected action

Select from:

☑ Unknown

Water

(5.11.7.2) Action driven by supplier engagement

Select from:

☑ Adoption of the United Nation’s International Labour Organization principles

(5.11.7.3) Type and details of engagement

Capacity building

☑ Provide training, support and best practices on how to mitigate environmental impact

Information collection

☑ Collect water quantity information at least annually from suppliers (e.g., withdrawal and discharge volumes)

Innovation and collaboration

☑ Collaborate with suppliers on innovations to reduce environmental impacts in products and services

(5.11.7.4) Upstream value chain coverage

Select all that apply

☑ Tier 1 suppliers

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

Select from:

☑ 76-99%

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

In the supplier selection process, we take into account the existence of Management Systems such as ISO 9001 Quality, ISO 14001 Environment, ISO 45001 OHS, ISO 50001 Energy, Product Responsibility, Diversity and Inclusion, Human Rights criteria. We demand corrective actions from our active suppliers that we determine do not comply with basic environmental criteria. We terminate cooperation with suppliers that we determine to have any negative environmental impact. Supplier Evaluation We have evaluated our active suppliers in accordance with the Supplier Performance Evaluation according to the evaluation parameters of 'Quality Score', 'Deadline Compliance Score' and 'Receiver Score'. We expect our suppliers to comply with the rules written in the general conditions of procurement, contracts, specifications and other similar documents regulating our business relations with our suppliers, as well as the regulations on business ethics, human rights (no child labour, forced labour, discrimination, inequality, human rights violations, etc.), occupational health and safety and working conditions.

(5.11.7.10) Engagement is helping your tier 1 suppliers meet an environmental requirement related to this environmental issue

Select from:

☑ No, this engagement is unrelated to meeting an environmental requirement

(5.11.7.11) Engagement is helping your tier 1 suppliers engage with their own suppliers on the selected action

Select from:

☑ Unknown

[Add row]

(5.11.9) Provide details of any environmental engagement activity with other stakeholders in the value chain.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☑ Investors and shareholders

(5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Educate and work with stakeholders on understanding and measuring exposure to environmental risks

☑ Share information on environmental initiatives, progress and achievements

(5.11.9.3) % of stakeholder type engaged

Select from:

☑ 100%

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

☑ None

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

Akenerji engages with investors and shareholders to communicate how climate-related risks and opportunities may affect the company's operations, financial performance, investment decisions and long-term value creation. The company's key stakeholders were reviewed by the Sustainability Committee in 2024, and the next review is planned for 2026. Engagement with investors and shareholders is maintained through the General Assembly, one-to-one meetings, investor presentations, correspondence, the corporate website, public disclosures and annual reporting. The scope of climate-related engagement includes climate governance, physical and transition risks, scenario analysis, greenhouse gas emissions, climate-related targets, renewable-energy investments and Akenerji's approach to the low-carbon energy transition. These communication channels support transparent information sharing and enable investors and shareholders to assess the company's climate-related performance, risk management and strategic resilience.

(5.11.9.6) Effect of engagement and measures of success

Regular engagement with investors and shareholders supports transparent communication of Akenerji's climate-related risks, opportunities, targets and performance. Information needs and feedback identified through investor-relations channels contribute to the continued development of the company's climate-related disclosures and communication practices. The effectiveness of engagement is assessed through the continuity of investor and shareholder communication, the timely publication of climate-related information and the company's participation in recognized reporting platforms. Relevant outcomes include the publication of the Integrated Annual Report and TSRS-compliant Sustainability Report, continued reporting through CDP, and the integration of climate-related risks and opportunities into the company's risk management and reporting processes. These activities enable investors and shareholders to evaluate Akenerji's climate governance, greenhouse gas emissions, physical and transition risks, scenario analysis, renewable-energy activities and progress against its disclosed climate-related targets.

Water

(5.11.9.1) Type of stakeholder

Select from:

☑ Investors and shareholders

(5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Educate and work with stakeholders on understanding and measuring exposure to environmental risks

(5.11.9.3) % of stakeholder type engaged

Select from:

☑ 100%

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

Akenerji engages with investors and shareholders to provide transparent information on water-related risks, management practices and performance. The company's key stakeholders were reviewed by the Sustainability Committee in 2024, and the next review is planned for 2026. Engagement with investors and shareholders is maintained through the General Assembly, one-to-one meetings, investor presentations, correspondence, the corporate website, public disclosures and annual reporting. The scope of water-related engagement includes water withdrawal, consumption and discharge, independently verified water-footprint calculations, exposure to water stress and drought, and the potential effects of changing precipitation patterns on hydroelectric generation. These communication channels enable investors and shareholders to assess how water-related matters are managed in relation to operational continuity, climate resilience and long-term value creation.

(5.11.9.6) Effect of engagement and measures of success

Regular engagement with investors and shareholders supports transparent communication of Akenerji's water-related risks, management practices and performance. Information needs and feedback identified through investor-relations channels contribute to the continued development of the company's water-related disclosures and communication practices. The effectiveness of engagement is assessed through the continuity of investor and shareholder communication, the timely publication of water-related information and Akenerji's participation in recognized reporting platforms. Relevant outcomes include facility-level disclosure of water withdrawal, consumption and discharge, independent verification of water-footprint data, water-stress and drought assessments, and continued reporting through CDP Water Security. These activities enable investors and shareholders to evaluate how Akenerji manages water-related risks in relation to hydroelectric generation, operational continuity, climate resilience and long-term value creation.
[Add row]

C6. Environmental performance - Consolidation approach

(6.1) Provide details on your chosen consolidation approach for the calculation of environmental performance data.

Climate change

(6.1.1) Consolidation approach used

Select from:

☑ Financial control

(6.1.2) Provide the rationale for the choice of consolidation approach

Akenerji applies the financial control approach to consolidate its greenhouse gas emissions and other climate-related environmental performance data. This approach is aligned with the organizational boundary used in Akenerji's financial reporting and TSRS-compliant sustainability reporting. Accordingly, operations and entities over which Akenerji has financial control are included within the reporting boundary, including subsidiaries consolidated under the full consolidation method. The approach is applied consistently with the GHG Protocol and enables the reported environmental performance data to be aligned with Akenerji's consolidated financial reporting boundary.

Water

(6.1.1) Consolidation approach used

Select from:

☑ Financial control

(6.1.2) Provide the rationale for the choice of consolidation approach

Akenerji applies the financial control approach to consolidate its water-related environmental performance data, consistent with the approach used for climate-related data and the organizational boundary used in its financial and TSRS-compliant sustainability reporting. Using the same consolidation approach across environmental issues supports consistency and comparability between climate and water disclosures. Akenerji also carries out water footprint calculations across all power plants in line with ISO 14046, supporting consistent monitoring of water-related performance across the portfolio.

Biodiversity

(6.1.1) Consolidation approach used

Select from:

☑ Financial control

(6.1.2) Provide the rationale for the choice of consolidation approach

Akenerji applies the financial control approach to consolidate biodiversity-related environmental performance data, consistent with the organizational boundary used for its financial reporting, TSRS-compliant sustainability reporting, and other environmental disclosures. The boundary covers operations and entities under Akenerji's financial control. Biodiversity dependencies and impacts are assessed primarily in relation to the locations and operational activities of Akenerji's power generation facilities, particularly facilities that directly interact with terrestrial and aquatic ecosystems. Environmental and ecological impacts are identified and monitored through Environmental Impact Assessment processes, applicable regulatory requirements, site-level monitoring activities, and the corporate risk management framework. Using the financial control approach across environmental issues supports consistency and comparability between climate change, water, and biodiversity disclosures.
[Fixed row]

C7. Environmental performance - Climate change

(7.1) Is this your first year of reporting emissions data to CDP?

Select from:
☑ No

(7.1.1) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?

	Has there been a structural change?
	Select all that apply ☑ No

[Fixed row]

(7.1.2) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?

	Change(s) in methodology, boundary, and/or reporting year definition?
	Select all that apply ☑ No

[Fixed row]

(7.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.

Select all that apply

☑ Defra Environmental Reporting Guidelines: Including streamlined energy and carbon reporting guidance, 2019

☑ 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories

☑ ISO 14064-1

☑ The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

(7.3) Describe your organization's approach to reporting Scope 2 emissions.

(7.3.1) Scope 2, location-based

Select from:

☑ We are reporting a Scope 2, location-based figure

(7.3.2) Scope 2, market-based

Select from:

☑ We have operations where we are able to access electricity supplier emission factors or residual emissions factors, but are unable to report a Scope 2, market-based figure

(7.3.3) Comment

Akenerji calculates and reports its Scope 2 emissions using the location-based method, in line with the GHG Protocol. The calculation covers purchased electricity consumed within the reporting boundary and includes Akenerji's power generation operations. Location-based Scope 2 emissions are calculated using Türkiye's applicable national grid emission factor. Akenerji has operations where electricity supplier-specific emission factors or residual mix factors may be accessible. However, a complete and verified market-based Scope 2 calculation covering the entire reporting boundary was not available for the 2025 reporting year. Therefore, Akenerji is unable to report a Scope 2 market-based emissions figure for this reporting period. Akenerji generates renewable electricity and sells associated environmental attributes, including I-REC and voluntary carbon certificates, to third parties. These attributes are not retained or claimed against Akenerji's own purchased electricity consumption.

[Fixed row]

(7.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1, Scope 2 or Scope 3 emissions that are excluded from your disclosure of climate-related data?

Select from:
☑ No

(7.5) Provide your base year and base year emissions.

Scope 1

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

1560163.48

(7.5.3) Methodological details

Scope 1 emissions are quantified in accordance with ISO 14064-1:2018 under the financial control approach. The 2021 base year is retained as a fixed datum; no recalculation has been performed, as no structural changes were triggered and the boundary and methodology remain unchanged. Primary activity data is obtained from on-site fuel records covering stationary combustion (natural gas at Erzin NGCCPP), mobile combustion (vehicles, generators, fire pumps using diesel and gasoline) and fugitive sources (refrigerants, fire-extinguishing equipment). Fuel usage is metered and validated through internal audits. A calculation-based method is applied, using fuel-specific net calorific values and internationally recognized emission factors, primarily from the IPCC Guidelines and national inventories, accounting for CO_2, CH_4 and N_2O.

Scope 2 (location-based)

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

11131

(7.5.3) Methodological details

Scope 2 (location-based) emissions are quantified in accordance with ISO 14064-1:2018 under the financial control approach, representing indirect emissions from purchased electricity consumed within Akenerji's operations. The 2019 base year is retained as a fixed datum; no recalculation has been performed, as no structural changes were triggered and the boundary and methodology remain unchanged. Activity data is primarily derived from electricity consumption records across Akenerji's power plants, facilities and offices, obtained from utility invoices and on-site metering systems and validated through internal energy management processes. Emissions are calculated using a calculation-based method, applying Türkiye's national grid emission factor consistently across the inventory.

Scope 3 category 1: Purchased goods and services

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0.11

(7.5.3) Methodological details

Emissions are calculated using a spend/activity-based method, in which activity data is multiplied by emission factors sourced from the Ecoinvent and DEFRA databases. The emissions are quantified in accordance with ISO 14064-1 and classified under the GHG Protocol Scope 3 Standard.

Scope 3 category 2: Capital goods

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Emissions are calculated using a spend-based method, in which the purchase value of capital goods (in USD) is multiplied by the corresponding spend-based emission factors published by the USEPA. No material capital goods emissions were identified in the base year.

Scope 3 category 3: Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

253640.61

(7.5.3) Methodological details

Emissions are calculated using a fuel-based method covering the well-to-tank emissions of consumed fuels, the natural gas pressure-reduction/metering station (RMS) supplying the Erzin NGCCPP, and the fuels used in generators, fire pumps and vehicles. Fuel consumption is multiplied by the relevant life-cycle emission factors.

Scope 3 category 4: Upstream transportation and distribution

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Emissions are calculated using a distance-based method, in which the distance travelled (km) is combined with the weight of goods transported (tons) by vehicle type, applying emission factors from the Ecoinvent database. No material emissions were identified in the base year.

Scope 3 category 5: Waste generated in operations

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

1.49

(7.5.3) Methodological details

Emissions are calculated using a waste-type-specific method, in which waste quantities (tons) are multiplied by the corresponding emission factors published by DEFRA.

Scope 3 category 6: Business travel

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Emissions are calculated using a distance-based method for transport and a night/room-based method for accommodation, applying DEFRA emission factors together with country-specific factors for accommodation.

Scope 3 category 7: Employee commuting

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

56.89

(7.5.3) Methodological details

Emissions are calculated using a distance-based method, in which the total round-trip distance of the employee shuttle routes (km) is multiplied by the emission factors corresponding to the relevant vehicle types.

Scope 3 category 8: Upstream leased assets

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

This category is not relevant, as Akenerji owns and operates its generation facilities and therefore has no upstream leased assets.

Scope 3 category 9: Downstream transportation and distribution

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

300.48

(7.5.3) Methodological details

Emissions are calculated using a distance-based method covering the transport of waste to treatment facilities, in which the amount of waste transported (tons) is multiplied by the distance to the facility (km) and by Ecoinvent emission factors for the relevant vehicle types

Scope 3 category 10: Processing of sold products

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

This category is not relevant, as the electricity generated is sold directly to the grid without any further physical processing.

Scope 3 category 11: Use of sold products

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

1527813.21

(7.5.3) Methodological details

Emissions are calculated by multiplying the electricity delivered to the grid (TEİAŞ) in the base year by the relevant grid emission factor. The calculation is performed in accordance with ISO 14064-1 and classified under the GHG Protocol.

Scope 3 category 12: End of life treatment of sold products

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

This category is not relevant, as electricity is delivered directly to the grid and has no physical end-of-life treatment.

Scope 3 category 13: Downstream leased assets

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

This category is not relevant, as Akenerji has no downstream leased assets.

Scope 3 category 14: Franchises

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

This category is not relevant, as Akenerji does not operate any franchises.

Scope 3 category 15: Investments

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

This category is not relevant, as electricity generation is Akenerji's core business and no material investment-related emissions arise.

Scope 3: Other (upstream)

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

This category is not relevant, as no additional upstream emission sources were identified.

Scope 3: Other (downstream)

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

This category is not relevant, as no additional downstream emission sources were identified.
[Fixed row]

(7.6) What were your organization’s gross global Scope 1 emissions in metric tons CO2e?

Reporting year

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

1222561

(7.6.3) Methodological details

Scope 1 emissions are quantified in accordance with ISO 14064-1:2018, applying the financial control approach consistent with the consolidation approach reported. A calculation-based methodology is used, combining primary activity data (metered on-site fuel consumption for stationary combustion at the Erzin NGCCPP, mobile combustion in vehicles, generators and fire pumps, and fugitive sources) with fuel-specific net calorific values and emission factors from the IPCC Guidelines and national inventories. The inventory covers CO_2, CH_4 and N_2O, expressed in CO_2e using IPCC AR global warming potentials. In line with the GHG Protocol Corporate Standard, biogenic CO_2 emissions are excluded from this figure and reported separately.

Past year 1

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

1194380

(7.6.2) End date

12/31/2024

(7.6.3) Methodological details

Scope 1 emissions for the 2024 reporting period, quantified under ISO 14064-1:2018 using the same financial control approach, calculation-based methodology and emission factor sources as the current reporting year to ensure a consistent, like-for-like comparison over time. In line with the GHG Protocol Corporate Standard, biogenic CO_2 emissions are excluded from this figure and reported separately.

Past year 2

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

1189460

(7.6.2) End date

12/31/2023

(7.6.3) Methodological details

Scope 1 emissions for 2023 were quantified in accordance with ISO 14064-1 and the GHG Protocol Corporate Standard, applying the financial control approach. Primary fuel-consumption data from meters, internal records and purchase invoices were combined with fuel-specific net calorific values and applicable emission factors. The calculation covers relevant stationary and mobile combustion sources within the reporting boundary. Biogenic CO_2, where applicable, is excluded and reported separately. The boundary and calculation approach are consistent with the current reporting year.

Past year 3

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

1143657

(7.6.2) End date

12/31/2022

(7.6.3) Methodological details

Scope 1 emissions for 2022 were quantified in accordance with ISO 14064-1 and the GHG Protocol Corporate Standard, applying the financial control approach. Primary fuel-consumption data from meters, internal records and purchase invoices were combined with fuel-specific net calorific values and applicable emission factors. The calculation covers relevant stationary and mobile combustion sources within the reporting boundary. Biogenic CO_2, where applicable, is excluded and reported separately. The boundary and calculation approach are consistent with the current reporting year.
[Fixed row]

(7.7) What were your organization's gross global Scope 2 emissions in metric tons CO2e?

Reporting year

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

13713

(7.7.4) Methodological details

Scope 2 location-based emissions were calculated in accordance with ISO 14064-1 and the GHG Protocol using purchased electricity consumption within the reporting boundary. Electricity consumption data were obtained from facility meters and relevant electricity records. The applicable national electricity consumption-point emission factors published by Türkiye's Ministry of Energy and Natural Resources were applied consistently across the 2025 inventory.

Past year 1

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

10567

(7.7.3) End date

12/31/2024

(7.7.4) Methodological details

Scope 2 emissions were calculated following ISO 14064-1 and GHG Protocol standards, based on electricity purchased from the national grid. Electricity consumption data were collected from TEİAŞ meters linked to the facility's transformer and validated by cross-referencing with EPİAŞ reports. Consumption data were recorded hourly and aggregated daily and monthly. Emission factors applied were sourced from the International Energy Agency (IEA) 2021 dataset. This methodology ensures consistent, verifiable, and internationally recognized emissions reporting.

Past year 2

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

9713

(7.7.3) End date

12/31/2023

(7.7.4) Methodological details

In 2023, Scope 2 emissions were calculated in accordance with ISO 14064-1 and the GHG Protocol standards, based on electricity consumption purchased from the national grid. Electricity usage data were obtained from TEİAŞ meters installed on the facility's transformer and validated through comparison with EPİAŞ reports. Hourly consumption data were compiled and reported on daily and monthly intervals. Emission factors sourced from the International Energy Agency (IEA) 2020 were applied as follows: CO_2 – 0.4313 kg/kWh, N_2O – 0.002 kg/kWh, and CH_4 – 0.0001 kg/kWh. The total electricity purchased from the grid in 2023 amounted to 20,296,896 kWh. This methodology ensures accurate, consistent, and verifiable emissions reporting aligned with internationally recognized standards.

Past year 3

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

9381

(7.7.3) End date

12/31/2022

(7.7.4) Methodological details

In 2022,Scope 2 emissions were calculated using electricity consumption data from the national grid. Total electricity usage was recorded via metering systems at the transformer station and validated against monthly reports from the Energy Market Regulatory Authority (EPİAŞ). Emission factors applied were derived from the International Energy Agency (IEA) 2020 dataset as follows: CO_2 – 0.4313 kgCO_2/kWh, N_2O – 0.002 kg/kWh, and CH_4 – 0.0001 kg/kWh. Verified electricity consumption for 2022 totaled 19,858,873 kWh. This approach ensures accurate and transparent emissions reporting based on robust consumption data and internationally accepted methodologies.
[Fixed row]

(7.8) Account for your organization’s gross global Scope 3 emissions, disclosing and explaining any exclusions.

Purchased goods and services

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

258

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average data method

☑ Spend-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

Emissions from purchased goods and services were calculated by multiplying activity/spend data by the corresponding emission factors published in the Ecoinvent and DEFRA databases. The calculation was performed in accordance with ISO 14064-1 and the emissions were classified under the GHG Protocol, Category 1. The reported figure has been independently verified under ISO 14064-1:2018 and ISO 14064-3:2019.

Capital goods

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

13

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average spend-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

Emissions related to capital goods cover the capital goods purchased during the reporting year. The calculation was performed using spend-based emission factors published by the U.S. Environmental Protection Agency (USEPA); the purchase value of each capital good was used as activity data and multiplied by the corresponding USEPA emission factor. The calculation was performed in accordance with ISO 14064-1 and the emissions were classified under the GHG Protocol, Category 2. The reported figure has been independently verified under ISO 14064-1:2018 and ISO 14064-3:2019.

Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

211625

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

This category covers upstream (Well-to-Tank - WTT) emissions of fuels consumed, together with transmission and distribution (T&D) losses and WTT emissions associated with purchased electricity, that are not included in Scope 1 or Scope 2. All fuels consumed during the 2025 reporting year were converted into mass units and included in the calculation using emission factors published by DEFRA. T&D losses and WTT emissions related to purchased electricity were determined using emission factors published by the International Energy Agency (IEA). The calculation was performed in accordance with ISO 14064-1 and classified under the GHG Protocol, Category 3. The reported figure has been independently verified under ISO 14064-1:2018 and ISO 14064-3:2019.

Upstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

62

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Distance-based method

☑ Other, please specify :Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

This category covers emissions from the upstream transportation and distribution of purchased goods and materials. Activity data were generated by multiplying the distance travelled by the weight of the transported goods, based on the type of vehicle used, and emission factors specific to each vehicle type were sourced from the Ecoinvent database and applied on a Well-to-Wheel basis. The calculation was performed in accordance with ISO 14064-1 and classified under the GHG Protocol, Category 4. The reported figure has been independently verified under ISO 14064-1:2018 and ISO 14064-3:2019.

Waste generated in operations

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

10

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Waste-type-specific method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

This category covers emissions from the treatment and disposal of waste generated in Akenerji's operations. Activity data on waste quantities by type were compiled, and emissions were calculated using waste-type-specific emission factors published by DEFRA. The calculation was performed in accordance with ISO 14064-1 and classified under the GHG Protocol, Category 5. The reported figure has been independently verified under ISO 14064-1:2018 and ISO 14064-3:2019.

Business travel

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

234

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Distance-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

This category covers emissions from employee business travel, including transportation and accommodation. Activity data for transportation were based on the distance travelled, while accommodation was calculated by multiplying the number of nights by the number of rooms. Emissions were calculated using DEFRA emission factors for the relevant modes of transport (on a Well-to-Wheel basis) and country-specific emission factors for accommodation. The calculation was performed in accordance with ISO 14064-1 and classified under the GHG Protocol, Category 6. The reported figure has been independently verified under ISO 14064-1:2018 and ISO 14064-3:2019.

Employee commuting

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

368

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average data method

☑ Distance-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

This category covers emissions from employee commuting, provided primarily through company shuttle services. Activity data were based on the total round-trip distance of each shuttle route (in km), and emissions were calculated on a Well-to-Wheel basis using DEFRA emission factors corresponding to the relevant vehicle types. The calculation was performed in accordance with ISO 14064-1 and classified under the GHG Protocol, Category 7. The reported figure has been independently verified under ISO 14064-1:2018 and ISO 14064-3:2019.

Upstream leased assets

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

Select from:

☑ Emissions covered under scope 1 or 2

(7.8.6) Please explain

Akenerji's operations are based on the ownership and operation of its electricity-generation facilities. The only assets leased by the company are vehicles provided for operational use, whose fuel combustion emissions are already accounted for within the organization's Scope 1 inventory (mobile combustion). There are no other upstream leased assets that would give rise to emissions not already captured under Scope 1 or Scope 2. Having assessed this category on this basis, it is not relevant to Akenerji's operations.

Downstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

21

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Distance-based method

☑ Fuel-based method

☑ Other, please specify :Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

This category covers emissions from the transportation of waste to disposal facilities. Emissions are calculated by multiplying the amount of waste transported by the distance to the disposal facility and applying emission factors from the Ecoinvent database based on the vehicle type used, on a Well-to-Wheel basis. The methodology remains consistent with the base year and previous reporting years.

Processing of sold products

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

Select from:

☑ Not applicable to our organization’s activities

(7.8.6) Please explain

Akenerji's core business activity is electricity generation, and the electricity produced is sold directly to the national grid as a final product without undergoing any further physical processing by intermediaries. Having assessed this category, no associated emissions arise from the processing of sold products. Therefore, this category is not applicable to Akenerji's operations.

Use of sold products

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

1196907

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Other, please specify :Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

In 2025, a total of 3,304,831,247 kWh of net electricity generated at the natural gas combined cycle power plant was delivered to the Turkish Electricity Transmission Corporation (TEİAŞ). GHG emissions associated with this activity were calculated by applying relevant emission factors to the reported activity data. Electricity generated by the renewable (hydroelectric and wind) facilities is excluded from this category, as its use-phase emissions are zero. The calculation methodology adhered to the principles and guidance of ISO 14064-1, ensuring a standardized approach to emissions quantification and reporting. Additionally, Scope 3 emissions were identified and categorized in accordance with the GHG Protocol, with the applied methodology ensuring alignment and consistency with the defined Scope 3

categories and boundaries under the standard. This is the organization's largest Scope 3 category, and the reported figure has been independently verified under ISO 14064-1 and ISO 14064-3 (limited assurance).

End of life treatment of sold products

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

Select from:

☑ Not applicable to our organization’s activities

(7.8.6) Please explain

As the product generated and sold is electricity, it is consumed at the point of use and does not result in any physical waste requiring disposal or end-of-life treatment. Having assessed this category, no associated emissions arise from the end-of-life stage of the sold product. Consequently, this Scope 3 category has been assessed as not relevant to Akenerji's operations.

Downstream leased assets

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

Select from:

☑ Not applicable to our organization’s activities

(7.8.6) Please explain

As of 2025, Akenerji has no downstream leased assets. The electricity produced is sold directly to the national grid, and no assets owned by Akenerji are leased out to third parties. Having assessed this category, no associated emissions arise. Therefore, this category is not relevant to Akenerji's operations.

Franchises

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

Select from:

☑ Not applicable to our organization’s activities

(7.8.6) Please explain

As of 2025, Akenerji does not operate under a franchise model and has no franchise arrangements. All operations are conducted directly by the company. Having assessed this category, no associated emissions arise. Therefore, this category is not applicable to Akenerji's operations.

Investments

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

Select from:

☑ Emissions covered under scope 1 or 2

(7.8.6) Please explain

Akenerji applies the financial control approach. The Group's subsidiaries and equity holdings are electricity-generation entities over which Akenerji exercises operational control; their emissions are therefore already accounted for within the organization's Scope 1 and Scope 2 inventory (and reported separately under ISO 14064-1 verification), rather than as financed/investment emissions under this category. Akenerji has no other equity or debt investments in entities outside its operational boundary that would give rise to material Scope 3 Category 15 emissions. Having assessed this category on this basis, it is not relevant to Akenerji's operations.

Other (upstream)

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

Select from:

☑ Not applicable to our organization’s activities

(7.8.6) Please explain

As of 2025, all material upstream activities contributing to Akenerji's Scope 3 emissions have been identified and reported under the relevant categories above. No additional upstream sources beyond these assessed categories have been identified within Akenerji's value chain. Therefore, this category is not applicable.

Other (downstream)

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

Select from:

☑ Not applicable to our organization’s activities

(7.8.6) Please explain

As of 2025, Akenerji's only downstream activity is the sale of electricity, the associated emissions of which are already accounted for under Scope 3 Category 11. There are no additional downstream activities beyond those already assessed. Therefore, this category is not applicable.
[Fixed row]

(7.8.1) Disclose or restate your Scope 3 emissions data for previous years.

Past year 1

(7.8.1.1) End date

12/31/2024

(7.8.1.2) Scope 3: Purchased goods and services (metric tons CO2e)

31

(7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

14

(7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

188994

(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)

8

(7.8.1.6) Scope 3: Waste generated in operations (metric tons CO2e)

3

(7.8.1.7) Scope 3: Business travel (metric tons CO2e)

138

(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)

300

(7.8.1.9) Scope 3: Upstream leased assets (metric tons CO2e)

0

(7.8.1.10) Scope 3: Downstream transportation and distribution (metric tons CO2e)

2

(7.8.1.11) Scope 3: Processing of sold products (metric tons CO2e)

0

(7.8.1.12) Scope 3: Use of sold products (metric tons CO2e)

1193157

(7.8.1.13) Scope 3: End of life treatment of sold products (metric tons CO2e)

0

(7.8.1.14) Scope 3: Downstream leased assets (metric tons CO2e)

0

(7.8.1.15) Scope 3: Franchises (metric tons CO2e)

0

(7.8.1.16) Scope 3: Investments (metric tons CO2e)

0

(7.8.1.17) Scope 3: Other (upstream) (metric tons CO2e)

0

(7.8.1.18) Scope 3: Other (downstream) (metric tons CO2e)

0

(7.8.1.19) Comment

GHG emissions for the reporting year have been calculated using the same methodology applied in the base year, with no revisions or modifications to the calculation approach. This ensures methodological consistency across reporting periods. The applied methodology is fully aligned with the principles and requirements set out in ISO 14064-1 and the GHG Protocol Corporate Standard. In the verification certificate, each category under Scope 3 is reported as a whole number, with decimal values rounded either up or down based on the data.

Past year 2

(7.8.1.1) End date

12/31/2023

(7.8.1.2) Scope 3: Purchased goods and services (metric tons CO2e)

0.11

(7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

0

(7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

186992.18

(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)

0

(7.8.1.6) Scope 3: Waste generated in operations (metric tons CO2e)

2.54

(7.8.1.7) Scope 3: Business travel (metric tons CO2e)

11.07

(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)

48.1

(7.8.1.9) Scope 3: Upstream leased assets (metric tons CO2e)

0

(7.8.1.10) Scope 3: Downstream transportation and distribution (metric tons CO2e)

242.83

(7.8.1.11) Scope 3: Processing of sold products (metric tons CO2e)

0

(7.8.1.12) Scope 3: Use of sold products (metric tons CO2e)

1189347.54

(7.8.1.13) Scope 3: End of life treatment of sold products (metric tons CO2e)

0

(7.8.1.14) Scope 3: Downstream leased assets (metric tons CO2e)

0

(7.8.1.15) Scope 3: Franchises (metric tons CO2e)

0

(7.8.1.16) Scope 3: Investments (metric tons CO2e)

0

(7.8.1.17) Scope 3: Other (upstream) (metric tons CO2e)

0

(7.8.1.18) Scope 3: Other (downstream) (metric tons CO2e)

0

(7.8.1.19) Comment

GHG emissions for the reporting year have been calculated using the same methodology applied in the base year, with no revisions or modifications to the calculation approach. This ensures methodological consistency across reporting periods. The applied methodology is fully aligned with the principles and requirements set out in ISO 14064-1 and the GHG Protocol Corporate Standard. In the verification certificate, each category under Scope 3 is reported as a whole number, with decimal values rounded either up or down based on the data.

Past year 3

(7.8.1.1) End date

12/31/2022

(7.8.1.2) Scope 3: Purchased goods and services (metric tons CO2e)

0.1

(7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

0

(7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

189471.63

(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)

0

(7.8.1.6) Scope 3: Waste generated in operations (metric tons CO2e)

2.76

(7.8.1.7) Scope 3: Business travel (metric tons CO2e)

11.6

(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)

56.89

(7.8.1.9) Scope 3: Upstream leased assets (metric tons CO2e)

0

(7.8.1.10) Scope 3: Downstream transportation and distribution (metric tons CO2e)

200.51

(7.8.1.11) Scope 3: Processing of sold products (metric tons CO2e)

0

(7.8.1.12) Scope 3: Use of sold products (metric tons CO2e)

911055.69

(7.8.1.13) Scope 3: End of life treatment of sold products (metric tons CO2e)

0

(7.8.1.14) Scope 3: Downstream leased assets (metric tons CO2e)

0

(7.8.1.15) Scope 3: Franchises (metric tons CO2e)

0

(7.8.1.16) Scope 3: Investments (metric tons CO2e)

0

(7.8.1.17) Scope 3: Other (upstream) (metric tons CO2e)

0

(7.8.1.18) Scope 3: Other (downstream) (metric tons CO2e)

0

(7.8.1.19) Comment

GHG emissions for the reporting year have been calculated using the same methodology applied in the base year, with no revisions or modifications to the calculation approach. This ensures methodological consistency across reporting periods. The applied methodology is fully aligned with the principles and requirements set out in ISO 14064-1 and the GHG Protocol Corporate Standard.
[Fixed row]

(7.9) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	*Select from:* ☑ Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	*Select from:* ☑ Third-party verification or assurance process in place
Scope 3	*Select from:* ☑ Third-party verification or assurance process in place

[Fixed row]

(7.9.1) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.

Row 1

(7.9.1.1) Verification or assurance cycle in place

Select from:
☑ Annual process

(7.9.1.2) Status in the current reporting year

Select from:
☑ Complete

(7.9.1.3) Type of verification or assurance

Select from:
☑ Reasonable assurance

(7.9.1.4) Attach the statement

Akenerji_ISO14064_Dogrulama Beyani.pdf,Ak-El Sungurlu _ ISO14064_Dogrulama beyani.pdf,5ER_ISO14064_Dogrulama beyani.pdf

(7.9.1.5) Page/section reference

The verification results for Scope 1 emissions for the year 2025, along with the relevant references, can be found on pages 3, 4, 5 of the verification documentation.

(7.9.1.6) Relevant standard

Select all that apply

☑ ISO14064-3

(7.9.1.7) Proportion of reported emissions verified (%)

100
[Add row]

(7.9.2) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.

Row 1

(7.9.2.1) Scope 2 approach

Select from:

☑ Scope 2 location-based

(7.9.2.2) Verification or assurance cycle in place

Select from:

☑ Annual process

(7.9.2.3) Status in the current reporting year

Select from:
☑ Complete

(7.9.2.4) Type of verification or assurance

Select from:
☑ Reasonable assurance

(7.9.2.5) Attach the statement

Akenerji_ISO14064_Dogrulama Beyani.pdf,5ER_ISO14064_Dogrulama beyani.pdf,Ak-El Sungurlu _ ISO14064_Dogrulama beyani.pdf

(7.9.2.6) Page/ section reference

The verification results for Scope 2 emissions for the year 2025, along with the relevant references, can be found on pages 3, 4, 5 of the verification documentation.

(7.9.2.7) Relevant standard

Select all that apply
☑ ISO14064-3

(7.9.2.8) Proportion of reported emissions verified (%)

100
[Add row]

(7.9.3) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.

Row 1

(7.9.3.1) Scope 3 category

Select all that apply

☑ Scope 3: Capital goods
☑ Scope 3: Business travel
☑ Scope 3: Employee commuting
☑ Scope 3: Use of sold products
☑ Scope 3: Purchased goods and services
☑ Scope 3: Waste generated in operations
☑ Scope 3: Upstream transportation and distribution
☑ Scope 3: Downstream transportation and distribution
☑ Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2)

(7.9.3.2) Verification or assurance cycle in place

Select from:
☑ Annual process

(7.9.3.3) Status in the current reporting year

Select from:
☑ Complete

(7.9.3.4) Type of verification or assurance

Select from:
☑ Limited assurance

(7.9.3.5) Attach the statement

Akenerji_ISO14064_Dogrulama Beyani.pdf,5ER_ISO14064_Dogrulama beyani.pdf,Ak-El Sungurlu _ ISO14064_Dogrulama beyani.pdf

(7.9.3.6) Page/section reference

The verification results for Scope 3 emissions for the year 2025, along with the relevant references, can be found on pages 2, 3, 4, 5 of the verification documentation.

(7.9.3.7) Relevant standard

Select all that apply
☑ ISO14064-3

(7.9.3.8) Proportion of selected emissions categories verified (%)

100

(7.9.3.9) Proportion of total reported scope 3 emissions verified (%)

100
[Add row]

(7.10) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Select from:
☑ Increased

(7.10.1) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.

Change in renewable energy consumption

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:
☑ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

No change in emissions attributable to renewable energy consumption; Scope 2 is grid-based and no additional renewable electricity certificates were retired for own consumption.

Other emissions reduction activities

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☑ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

There is no other emissions reduction activities in the reporting year. Therefore, other emissions reduction activities has not been included in the calculation.

Divestment

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☑ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

There is no divestment in the reporting year. Therefore, divestment has not been included in the calculation.

Acquisitions

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☑ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

There is no acquisition in the reporting year. Therefore, acquisition has not been included in the calculation.

Mergers

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☑ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

There are no mergers in the reporting year. Therefore, mergers have not been included in the calculation.

Change in output

(7.10.1.1) Change in emissions (metric tons CO2e)

28181

(7.10.1.2) Direction of change in emissions

Select from:

☑ Increased

(7.10.1.3) Emissions value (percentage)

2.3388

(7.10.1.4) Please explain calculation

Scope 1 emissions increased from 1,194,380.2 tCO_2e in 2024 to 1,222,561.2 tCO_2e in 2025, representing an increase of 28,181.0 tCO_2e. This increase was primarily driven by higher natural gas-fired electricity generation at Erzin NGCCPP. The percentage contribution to the change in combined Scope 1 and Scope 2 emissions was calculated as (28,181.0 / 1,204,947.2) × 100 = 2.3388%, using the previous year's combined Scope 1 and location-based Scope 2 emissions as the denominator.

Change in methodology

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☑ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

There is no changing in methodology in the reporting year. Therefore, changing in methodology has not been included in the calculation.

Change in boundary

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☑ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

There is no changing in boundary in the reporting year. Therefore, changing in boundary has not been included in the calculation.

Change in physical operating conditions

(7.10.1.1) Change in emissions (metric tons CO2e)

3146.3

(7.10.1.2) Direction of change in emissions

Select from:

☑ Increased

(7.10.1.3) Emissions value (percentage)

0.2611

(7.10.1.4) Please explain calculation

Location-based Scope 2 emissions increased from 10,567.0 tCO_2e in 2024 to 13,713.3 tCO_2e in 2025, representing an increase of 3,146.3 tCO_2e. This increase was driven by higher grid electricity consumption associated with operating conditions at Erzin NGCCPP, including an operational outage during the reporting year. The percentage contribution to the change in combined Scope 1 and Scope 2 emissions was calculated as (3,146.3 / 1,204,947.2) × 100 = 0.2611%, using the previous year's combined Scope 1 and location-based Scope 2 emissions as the denominator.

Unidentified

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☑ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

There is no unidentified emission in the reporting year. Therefore, unidentified emission has not been included in the calculation.

Other

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☑ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

There is no other emission in the reporting year. Therefore, other emission has not been included in the calculation.
[Fixed row]

(7.12) Does your organization have significant land sector activities in its operations or value chain?

(7.12.1) Agriculture, forestry or other land sector activities

Select from:

☑ No, explanation provided

(7.12.3) Specify the reason for no significant activities

Select from:

☑ Relevant activities identified but evaluated to be below the significance threshold

(7.12.4) Significance threshold

Akenerji's core operations — natural gas, hydroelectric and wind power generation — do not involve agricultural, forestry or other land sector activities. A subsidiary operates a biomass power plant, whose biogenic fuel consumption is a land sector-related activity; however, it represents a minor share of the Group's total

emissions and is evaluated to be below the significance threshold applied (less than 5% of total Group emissions). Therefore, the organization does not consider itself to have significant land sector activities.
[Fixed row]

(7.13) Does your organization choose to account for and report technological CO2 removals or captured CO2 with geologic storage, or have you done so in previous years?

	Technological CO2 removals or captured CO2 with geologic storage in the reporting year	Specify the reason for no technological CO2 removals or captured CO2 with geological storage in the reporting year	Technological CO2 removals or captured CO2 with geologic storage were accounted for and reported in previous years
	Select from: ☑ No, explanation provided	*Select from:* ☑ No relevant activities identified	*Select from:* ☑ No

[Fixed row]

(7.15) Does your organization break down its Scope 1 and/or Scope 2 emissions by greenhouse gas type?

(7.15.1) Emissions breakdown by greenhouse gas type

Select from:
☑ Yes, both Scope 1 and Scope 2 emissions
[Fixed row]

(7.15.1) Break down your total gross global Scope 1 and Scope 2 emissions by greenhouse gas type and provide the source of each used global warming potential (GWP).

Row 1

(7.15.1.1) Greenhouse gas

Select from:
☑ CO2

(7.15.1.2) Scope 1 emissions (metric tons of selected gas)

1219256.47

(7.15.1.3) Scope 1 emissions (metric tons of CO2e)

1219256.47

(7.15.1.4) Scope 2 location-based emissions (metric tons of selected gas)

13576.19

(7.15.1.5) Scope 2 location-based emissions (metric tons of CO2e)

13576.19

(7.15.1.8) GWP Reference

Select from:
☑ IPCC Sixth Assessment Report (AR6 - 100 year)

Row 2

(7.15.1.1) Greenhouse gas

Select from:
☑ CH4

(7.15.1.2) Scope 1 emissions (metric tons of selected gas)

41.53

(7.15.1.3) Scope 1 emissions (metric tons of CO2e)

1177.41

(7.15.1.4) Scope 2 location-based emissions (metric tons of selected gas)

1.98

(7.15.1.5) Scope 2 location-based emissions (metric tons of CO2e)

58.97

(7.15.1.8) GWP Reference

Select from:

☑ IPCC Sixth Assessment Report (AR6 - 100 year)

Row 3

(7.15.1.1) Greenhouse gas

Select from:

☑ N2O

(7.15.1.2) Scope 1 emissions (metric tons of selected gas)

4.92

(7.15.1.3) Scope 1 emissions (metric tons of CO2e)

1342.91

(7.15.1.4) Scope 2 location-based emissions (metric tons of selected gas)

0.29

(7.15.1.5) Scope 2 location-based emissions (metric tons of CO2e)

78.17

(7.15.1.8) GWP Reference

Select from:
☑ IPCC Sixth Assessment Report (AR6 - 100 year)

Row 4

(7.15.1.1) Greenhouse gas

Select from:
☑ HFCs

(7.15.1.2) Scope 1 emissions (metric tons of selected gas)

0.273

(7.15.1.3) Scope 1 emissions (metric tons of CO2e)

615.17

(7.15.1.4) Scope 2 location-based emissions (metric tons of selected gas)

0

(7.15.1.5) Scope 2 location-based emissions (metric tons of CO2e)

0

(7.15.1.8) GWP Reference

Select from:

☑ IPCC Sixth Assessment Report (AR6 - 100 year)

Row 5

(7.15.1.1) Greenhouse gas

Select from:
☑ SF6

(7.15.1.2) Scope 1 emissions (metric tons of selected gas)

0.007

(7.15.1.3) Scope 1 emissions (metric tons of CO2e)

169.21

(7.15.1.4) Scope 2 location-based emissions (metric tons of selected gas)

0

(7.15.1.5) Scope 2 location-based emissions (metric tons of CO2e)

0

(7.15.1.8) GWP Reference

Select from:
☑ IPCC Sixth Assessment Report (AR6 - 100 year)
[Add row]

(7.15.3) Break down your total gross global Scope 1 emissions from electric utilities value chain activities by greenhouse gas type.

Fugitives

(7.15.3.1) Gross Scope 1 CO2 emissions (metric tons CO2)

12

(7.15.3.2) Gross Scope 1 methane emissions (metric tons CH4)

0

(7.15.3.3) Gross Scope 1 SF6 emissions (metric tons SF6)

0.007

(7.15.3.4) Total gross Scope 1 emissions (metric tons CO2e)

796.21

(7.15.3.5) Comment

Fugitive emissions for the year 2025 have been calculated based on a breakdown of individual emission sources, comprising SF6 leakage from transformer/switchgear equipment, HFC refrigerant leakage from cooling equipment and CO_2 from fire-suppression systems.

Combustion (Electric utilities)

(7.15.3.1) Gross Scope 1 CO2 emissions (metric tons CO2)

1219244.47

(7.15.3.2) Gross Scope 1 methane emissions (metric tons CH4)

41.527

(7.15.3.3) Gross Scope 1 SF6 emissions (metric tons SF6)

0

(7.15.3.4) Total gross Scope 1 emissions (metric tons CO2e)

1221764.79

(7.15.3.5) Comment

Combustion (electric utilities) emissions for the year 2025 have been calculated based on a breakdown of individual emission sources.

Combustion (Gas utilities)

(7.15.3.1) Gross Scope 1 CO2 emissions (metric tons CO2)

0

(7.15.3.2) Gross Scope 1 methane emissions (metric tons CH4)

0

(7.15.3.3) Gross Scope 1 SF6 emissions (metric tons SF6)

0

(7.15.3.4) Total gross Scope 1 emissions (metric tons CO2e)

0

(7.15.3.5) Comment

There is no combustion (gas utilities) in the reporting year. Therefore, Combustion (gas utilities) has not been included in the calculation.

Combustion (Other)

(7.15.3.1) Gross Scope 1 CO2 emissions (metric tons CO2)

0

(7.15.3.2) Gross Scope 1 methane emissions (metric tons CH4)

0

(7.15.3.3) Gross Scope 1 SF6 emissions (metric tons SF6)

0

(7.15.3.4) Total gross Scope 1 emissions (metric tons CO2e)

0

(7.15.3.5) Comment

There is no combustion (other) in the reporting year. Therefore, Combustion (other) has not been included in the calculation.

Emissions not elsewhere classified

(7.15.3.1) Gross Scope 1 CO2 emissions (metric tons CO2)

0

(7.15.3.2) Gross Scope 1 methane emissions (metric tons CH4)

0

(7.15.3.3) Gross Scope 1 SF6 emissions (metric tons SF6)

0

(7.15.3.4) Total gross Scope 1 emissions (metric tons CO2e)

0

(7.15.3.5) Comment

There is no emissions not elsewhere classified in the reporting year. Therefore, emissions not elsewhere classified has not been included in the calculation.
[Fixed row]

(7.16) Break down your total gross global Scope 1 and 2 emissions by country/area.

	Scope 1 emissions (metric tons CO2e)
Türkiye	*1222561*

[Fixed row]

(7.17) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.

Select all that apply
☑ By activity

(7.17.3) Break down your total gross global Scope 1 emissions by business activity.

	Activity	Scope 1 emissions (metric tons CO2e)
Row 1	*Combustion at Power Plants (Stationary)*	*1221544.02*
Row 2	*Fuel Combustion in Emergency Equipment*	*92.02*
Row 3	*Vehicle-based combustion (Mobile)*	*133.75*
Row 4	*Fugitive gases*	*791.37*

[Add row]

(7.19) Break down your organization’s total gross global Scope 1 emissions by sector production activity in metric tons CO2e.

	Gross Scope 1 emissions, metric tons CO2e	Comment
Energy utility & power generators	*1222446.9*	*Organization’s total gross global Scope 1 emissions by sector production activity have been calculated.*

[Fixed row]

(7.22) Break down your gross Scope 1 and Scope 2 emissions between your consolidated accounting group and other entities included in your response.

Consolidated accounting group

(7.22.1) Scope 1 emissions (metric tons CO2e)

1222561

(7.22.2) Scope 2, location-based emissions (metric tons CO2e)

13713

(7.22.4) Please explain

The consolidated accounting group comprises Akenerji Elektrik Üretim A.Ş. and its consolidated subsidiaries, determined on the basis of financial control in line with the boundary used in the annual financial statements. All reported Scope 1 and Scope 2 emissions arise within this consolidated group.

All other entities

(7.22.1) Scope 1 emissions (metric tons CO2e)

0

(7.22.2) Scope 2, location-based emissions (metric tons CO2e)

0

(7.22.4) Please explain

There are no other entities included in the organizational boundary. Therefore, no additional emissions are generated.
[Fixed row]

(7.23) Is your organization able to break down your emissions data for any of the subsidiaries included in your CDP response?

Select from:
☑ Yes

(7.23.1) Break down your gross Scope 1 and Scope 2 emissions by subsidiary.

Row 1

(7.23.1.1) Subsidiary name

Akel Sungurlu Elektrik Üretim A.Ş. - Sungurlu Piroliz Santrali

(7.23.1.2) Primary activity

Select from:
☑ Biomass generation

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply
☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

45.86

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

22.11

(7.23.1.15) Comment

Akel Sungurlu Elektrik Üretim A.Ş. was included within Akenerji's reporting boundary under the financial control consolidation approach during the reporting year. The figures represent the subsidiary's gross Scope 1 emissions and Scope 2 location-based emissions for the 2025 reporting period. The Sungurlu facility was sold on 29 December 2025; therefore, the emissions generated while the subsidiary was within Akenerji's reporting boundary are included.

Row 2

(7.23.1.1) Subsidiary name

5ER Enerji Tarım Hayvancılık A.Ş. - Konya Biyokütle Enerji Santrali

(7.23.1.2) Primary activity

Select from:

☑ Biomass generation

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

1357.94

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

105.09

(7.23.1.15) Comment

5ER Enerji Tarım Hayvancılık A.Ş. is included within Akenerji's reporting boundary under the financial control consolidation approach. The Scope 1 figure represents fossil gross Scope 1 emissions for the 2025 reporting period. The Scope 2 figure represents location-based emissions.
[Add row]

(7.29) What percentage of your total operational spend in the reporting year was on energy?

Select from:
☑ More than 90% but less than or equal to 95%

(7.30) Select which energy-related activities your organization has undertaken.

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	*Select from:* ☑ Yes
Consumption of purchased or acquired electricity	*Select from:* ☑ Yes
Consumption of purchased or acquired heat	*Select from:* ☑ No
Consumption of purchased or acquired steam	*Select from:* ☑ No
Consumption of purchased or acquired cooling	*Select from:* ☑ No

	Indicate whether your organization undertook this energy-related activity in the reporting year
Generation of electricity, heat, steam, or cooling	*Select from:* ☑ Yes

[Fixed row]

(7.30.1) Report your organization’s energy consumption totals (excluding feedstocks) in MWh.

Consumption of fuel (excluding feedstock)

(7.30.1.1) Heating value

Select from:
☑ LHV (lower heating value)

(7.30.1.2) MWh from renewable sources

192309

(7.30.1.3) MWh from non-renewable sources

6038643

(7.30.1.5) Total (renewable + non-renewable) MWh

6230952.00

Consumption of purchased or acquired electricity

(7.30.1.2) MWh from renewable sources

0

(7.30.1.3) MWh from non-renewable sources

31598

(7.30.1.4) MWh from non-renewable zero or near-zero emission sources

0

(7.30.1.5) Total (renewable + non-renewable) MWh

31598.00

Consumption of self-generated non-fuel renewable energy

(7.30.1.2) MWh from renewable sources

611

(7.30.1.5) Total (renewable + non-renewable) MWh

611.00

Total energy consumption

(7.30.1.2) MWh from renewable sources

192920

(7.30.1.3) MWh from non-renewable sources

6070241

(7.30.1.4) MWh from non-renewable zero or near-zero emission sources

0

(7.30.1.5) Total (renewable + non-renewable) MWh

6263161.00
[Fixed row]

(7.30.6) Select the applications of your organization’s consumption of fuel.

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	*Select from:* ☑ Yes
Consumption of fuel for the generation of heat	*Select from:* ☑ No
Consumption of fuel for the generation of steam	*Select from:* ☑ No
Consumption of fuel for the generation of cooling	*Select from:* ☑ No
Consumption of fuel for co-generation or tri-generation	*Select from:* ☑ No

[Fixed row]

(7.30.7) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.

Sustainable biomass

(7.30.7.1) Total fuel MWh consumed by the organization

0

(7.30.7.2) MWh fuel consumed for self-generation of electricity

0

(7.30.7.3) MWh fuel consumed for self-generation of heat

0

(7.30.7.7) Comment

Akenerji does not utilize biomass in its electricity generation activities. Therefore, there is no associated generation output attributable to biomass use.

Other biomass

(7.30.7.1) Total fuel MWh consumed by the organization

192308.67

(7.30.7.2) MWh fuel consumed for self-generation of electricity

192308.67

(7.30.7.3) MWh fuel consumed for self-generation of heat

0

(7.30.7.7) Comment

Other biomass consumption relates to biomass used for electricity generation. As the feedstock is not covered by a recognized sustainability certification scheme, it is reported as "Other biomass".

Other renewable fuels (e.g. renewable hydrogen)

(7.30.7.1) Total fuel MWh consumed by the organization

0

(7.30.7.2) MWh fuel consumed for self-generation of electricity

0

(7.30.7.3) MWh fuel consumed for self-generation of heat

0

(7.30.7.7) Comment

The amount of other renewable fuels (e.g. renewable hydrogen) consumed by Akenerji, excluding feedstock use, has been calculated in terms of megawatt-hours (MWh) based on fuel type.

Coal

(7.30.7.1) Total fuel MWh consumed by the organization

0

(7.30.7.2) MWh fuel consumed for self-generation of electricity

0

(7.30.7.3) MWh fuel consumed for self-generation of heat

0

(7.30.7.7) Comment

Akenerji does not utilize coal in its electricity generation activities. Therefore, there is no associated generation output attributable to coal use.

Oil

(7.30.7.1) Total fuel MWh consumed by the organization

852.97

(7.30.7.2) MWh fuel consumed for self-generation of electricity

344.04

(7.30.7.3) MWh fuel consumed for self-generation of heat

0

(7.30.7.7) Comment

The amount of oil consumed by Akenerji has been calculated in terms of megawatt-hours (MWh) based on fuel type.

Gas

(7.30.7.1) Total fuel MWh consumed by the organization

6037790.02

(7.30.7.2) MWh fuel consumed for self-generation of electricity

6037790.02

(7.30.7.3) MWh fuel consumed for self-generation of heat

0

(7.30.7.7) Comment

The amount of gas consumed by Akenerji has been calculated in terms of megawatt-hours (MWh) based on fuel type. Gas consumption data related to electricity generation has been calculated and reported.

Other non-renewable fuels (e.g. non-renewable hydrogen)

(7.30.7.1) Total fuel MWh consumed by the organization

0

(7.30.7.2) MWh fuel consumed for self-generation of electricity

0

(7.30.7.3) MWh fuel consumed for self-generation of heat

0

(7.30.7.7) Comment

Akenerji does not utilize other non-renewable fuels in its electricity generation activities. Therefore, there is no associated generation output attributable to other non renewable fuels use.

Total fuel

(7.30.7.1) Total fuel MWh consumed by the organization

6230951.66

(7.30.7.2) MWh fuel consumed for self-generation of electricity

6230442.73

(7.30.7.3) MWh fuel consumed for self-generation of heat

0

(7.30.7.7) Comment

The amount of total fuels consumed by Akenerji, excluding feedstock use, has been calculated in terms of megawatt-hours (MWh) based on fuel type.
[Fixed row]

(7.30.14) Provide a breakdown by country/area of your electricity/heat/steam/cooling consumption in the reporting year.

Türkiye

(7.30.14.1) Consumption of purchased electricity (MWh)

31597.52

(7.30.14.2) Consumption of self-generated electricity (MWh)

611.19

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

32208.71
[Fixed row]

(7.33) Does your electric utility organization have a transmission and distribution business?

Select from:
☑ No

(7.45) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

Row 1

(7.45.1) Intensity figure

0.328

(7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

1236274.5

(7.45.3) Metric denominator

Select from:

☑ megawatt hour generated (MWh)

(7.45.4) Metric denominator: Unit total

3772752.7

(7.45.6) % change from previous year

7.93

(7.45.7) Direction of change

Select from:

☑ Increased

(7.45.8) Reasons for change

Select all that apply

☑ Change in output

(7.45.9) Please explain

In 2024, Akenerji's combined Scope 1 and location-based Scope 2 emissions were 1,204,947.2 tCO_2e, compared with 1,236,274.5 tCO_2e in 2025. Gross electricity generation decreased from 3,968,772.7 MWh in 2024 to 3,772,752.7 MWh in 2025. Accordingly, emissions intensity increased from 0.303607 tCO_2e/MWh to

0.327685 tCO_2e/MWh, representing an increase of 7.93%. The increase reflects lower gross electricity generation alongside higher combined Scope 1 and location-based Scope 2 emissions during the reporting year.
[Add row]

(7.46) For your electric utility activities, provide a breakdown of your Scope 1 emissions and emissions intensity relating to your total power plant capacity and generation during the reporting year by source.

	Absolute scope 1 emissions (metric tons CO2e)	Emissions intensity based on gross or net electricity generation	Scope 1 emissions intensity (Gross generation)
Gas	*1220896.83*	*Select from:* ☑ Gross	*362.17*
Hydropower	*247.74*	*Select from:* ☑ Gross	*0.78*
Onshore wind	*12.79*	*Select from:* ☑ Gross	*0.15*
Total	*1221157.36*	*Select from:* ☑ Gross	*323.68*

[Fixed row]

(7.52) Provide any additional climate-related metrics relevant to your business.

Row 1

(7.52.1) Description

Select from:
☑ Energy usage

(7.52.2) Metric value

27.54

(7.52.3) Metric numerator

103,886.875 MWh

(7.52.4) Metric denominator (intensity metric only)

3,772.752699 GWh

(7.52.5) % change from previous year

15.55

(7.52.6) Direction of change

Select from:

☑ Increased

(7.52.7) Please explain

In 2025, total electricity consumption was 103,886.88 MWh against total gross electricity generation of 3,772.75 GWh, resulting in an electricity intensity of 27.54 MWh per GWh generated, compared with 23.83 MWh per GWh in 2024. This metric covers the organization's full electricity consumption, comprising 31,597.52 MWh of electricity purchased from the grid, 611.19 MWh of self-generated non-fuel renewable electricity consumed on site, and 71,678.17 MWh of self-generated electricity used internally by the power plants for auxiliary loads (own consumption). Electricity reported under question 7.30.14 (32,208.71 MWh) covers only purchased and self-generated non-fuel renewable electricity and therefore excludes in-house auxiliary consumption of generated electricity, which accounts for the difference between the two figures.

Row 2

(7.52.1) Description

Select from:

☑ Waste

(7.52.2) Metric value

0.01

(7.52.3) Metric numerator

29.184 tonnes

(7.52.4) Metric denominator (intensity metric only)

3,772.752699 GWh

(7.52.5) % change from previous year

52.24

(7.52.6) Direction of change

Select from:

☑ Decreased

(7.52.7) Please explain

In 2025, total waste generated was 29.18 tonnes and total gross electricity generation was 3,772.75 GWh, resulting in a waste intensity of 0.00747 tonnes per GWh generated. The corresponding 2024 intensity was recalculated as 0.01564 tonnes per GWh, based on 62.07 tonnes of waste and 3,968.77 GWh of gross electricity generation. Waste intensity therefore decreased by 52.24% in 2025, while waste segregation, recovery and disposal continued to be managed in accordance with applicable legislation and Akenerji's environmental management approach.
[Add row]

(7.53) Did you have an emissions target that was active in the reporting year?

Select all that apply

☑ Absolute target

☑ Intensity target

(7.53.1) Provide details of your absolute emissions targets and progress made against those targets.

Row 1

(7.53.1.1) Target reference number

Select from:

☑ Abs 1

(7.53.1.2) Is this a science-based target?

Select from:

☑ No, and we do not anticipate setting one in the next two years

(7.53.1.5) Date target was set

01/01/2024

(7.53.1.6) Target coverage

Select from:

☑ Business activity

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

(7.53.1.8) Scopes

Select all that apply

☑ Scope 1

(7.53.1.11) End date of base year

12/31/2021

(7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO2e)

226.14

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

0.000

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

226.140

(7.53.1.33) Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1

0.02

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

0.02

(7.53.1.54) End date of target

12/31/2030

(7.53.1.55) Targeted reduction from base year (%)

49

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

115.331

(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)

114.3

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

114.300

(7.53.1.78) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.1.79) % of target achieved relative to base year

100.93

(7.53.1.80) Target status in reporting year

Select from:

☑ Achieved and maintained

(7.53.1.82) Explain target coverage and identify any exclusions

The target covers direct Scope 1 emissions from fuel consumed by company vehicles used in Akenerji's power plant operations. It does not cover other Scope 1 emission sources, including stationary combustion at Erzin NGCCPP, emergency generators, refrigerants, fire suppression equipment, or Scope 1 emissions from consolidated subsidiaries. The target does not rely on carbon credits, avoided emissions or carbon removals. Akenerji's broader corporate planning horizon for this target extends to 2030.

(7.53.1.83) Target objective

The objective is to reduce and maintain direct greenhouse gas emissions from company vehicles below the 2021 base-year level through improved fleet efficiency and driving performance. The target supports Akenerji's operational efficiency, emissions management and longer-term decarbonization approach.

(7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

☑ Yes

(7.53.1.86) List the emissions reduction initiatives which contributed most to achieving this target

The main emissions reduction initiative contributing to the achievement of this target was the vehicle-based monitoring of fuel consumption through the company's fuel tracking system. The continued monitoring of company vehicles and the implementation of fuel consumption reduction efforts supported the reduction of Scope 1 emissions associated with company vehicle use.

Row 2

(7.53.1.1) Target reference number

Select from:

☑ Abs 2

(7.53.1.2) Is this a science-based target?

Select from:

☑ No, and we do not anticipate setting one in the next two years

(7.53.1.5) Date target was set

01/01/2024

(7.53.1.6) Target coverage

Select from:

☑ Business activity

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

(7.53.1.8) Scopes

Select all that apply

☑ Scope 2

(7.53.1.9) Scope 2 accounting method

Select from:
☑ Location-based

(7.53.1.11) End date of base year

12/31/2019

(7.53.1.13) Base year Scope 2 emissions covered by target (metric tons CO2e)

11132

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

0.000

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

11132.000

(7.53.1.34) Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2

100

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

100

(7.53.1.54) End date of target

12/31/2030

(7.53.1.55) Targeted reduction from base year (%)

0

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

11132.000

(7.53.1.58) Scope 2 emissions in reporting year covered by target (metric tons CO2e)

13586.1

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

13586.100

(7.53.1.78) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.1.80) Target status in reporting year

Select from:

☑ Underway

(7.53.1.82) Explain target coverage and identify any exclusions

The target covers location-based Scope 2 emissions arising from grid electricity purchased for Akenerji's nine power plants. Scope 2 emissions from consolidated subsidiaries, including Akel Sungurlu Elektrik Üretim A.Ş. and 5ER Enerji Tarım Hayvancılık A.Ş., are excluded from the target boundary. The target does not rely on carbon credits, avoided emissions or carbon removals. Akenerji's broader corporate planning horizon for this target extends to 2030.

(7.53.1.83) Target objective

The objective is to manage and reduce indirect emissions associated with grid electricity consumed at Akenerji's power plants through energy efficiency and operational improvement measures. The target supports Akenerji's energy management, operational efficiency and decarbonization strategy.

(7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

Akenerji plans to maintain location-based Scope 2 emissions from grid electricity purchased for its power plants at or below the 2019 base-year level. The target is supported by energy efficiency measures implemented under the ISO 50001 Energy Management System, including LED conversions, operational improvements, and employee awareness activities. Progress is monitored annually using location-based Scope 2 emissions associated with purchased grid electricity within the target boundary. Akenerji's annual greenhouse gas emissions performance is reviewed by the Sustainability Committee, and the underlying emissions data are subject to independent third-party verification in accordance with ISO 14064. Akenerji will continue the energy efficiency measures implemented under ISO 50001, including LED conversions, operational improvements and employee awareness activities, to return performance to a level consistent with the target. Progress is expected to vary between years because purchased electricity demand may be affected by plant operating conditions; therefore, the observed and anticipated progress curve is variable. Performance will continue to be reviewed annually, with purchased electricity consumption and the associated location-based Scope 2 emissions used as the principal monitoring metrics. The target does not rely on carbon credits, avoided emissions or carbon removals.

(7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

☑ Yes

[Add row]

(7.53.2) Provide details of your emissions intensity targets and progress made against those targets.

Row 1

(7.53.2.1) Target reference number

Select from:

☑ Int 1

(7.53.2.2) Is this a science-based target?

Select from:

☑ Yes, we consider this a science-based target, but we have not committed to seek validation of this target by the Science Based Targets initiative within the next two years

(7.53.2.4) Target ambition

Select from:

☑ 1.5°C aligned

(7.53.2.5) Date target was set

12/30/2023

(7.53.2.6) Target coverage

Select from:

☑ Organization-wide

(7.53.2.7) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

(7.53.2.8) Scopes

Select all that apply

☑ Scope 1

☑ Scope 2

(7.53.2.9) Scope 2 accounting method

Select from:

☑ Location-based

(7.53.2.11) Intensity metric

Select from:

☑ Metric tons CO2e per megawatt hour (MWh)

(7.53.2.12) End date of base year

12/30/2021

(7.53.2.13) Intensity figure in base year for Scope 1

0.286

(7.53.2.14) Intensity figure in base year for Scope 2

0.001

(7.53.2.33) Intensity figure in base year for all selected Scopes

0.2870000000

(7.53.2.34) % of total base year emissions in Scope 1 covered by this Scope 1 intensity figure

99.54

(7.53.2.35) % of total base year emissions in Scope 2 covered by this Scope 2 intensity figure

0.43

(7.53.2.54) % of total base year emissions in all selected Scopes covered by this intensity figure

99.97

(7.53.2.55) End date of target

12/30/2030

(7.53.2.56) Targeted reduction from base year (%)

50

(7.53.2.57) Intensity figure at end date of target for all selected Scopes

0.1435000000

(7.53.2.58) % change anticipated in absolute Scope 1+2 emissions

-50

(7.53.2.60) Intensity figure in reporting year for Scope 1

0.3237

(7.53.2.61) Intensity figure in reporting year for Scope 2

0.0036

(7.53.2.80) Intensity figure in reporting year for all selected Scopes

0.3273000000

(7.53.2.81) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.2.82) % of target achieved relative to base year

-28.08

(7.53.2.83) Target status in reporting year

Select from:

☑ Underway

(7.53.2.85) Explain target coverage and identify any exclusions

Scope 3 emissions have been excluded from the current target boundary, and a GHG emissions reduction target has been set to achieve a 50% reduction in Scope 1 and Scope 2 emissions by 2030, relative to the 2021 base year. This exclusion allows the company to prioritize emissions sources over which it has operational

control, thereby ensuring focused and measurable progress toward its decarbonization objectives. The 50% reduction target is aligned with the company's broader climate strategy and supports national and global efforts to mitigate the impacts of climate change. The target is consistent with the Sectoral Decarbonisation Approach (SDA), a science-based method aligned with the goals of the Paris Agreement. In line with this approach, Akenerji has developed a roadmap to reduce its emissions intensity in electricity generation through a transition from fossil fuels—particularly natural gas—towards renewable energy sources. Akenerji's emission reduction strategy includes increasing the share of renewables in its generation portfolio, investing in energy efficiency initiatives, and integrating new technologies such as hybrid solar energy systems and energy storage solutions. These investments contribute to a lower emissions intensity across operations and align with both Türkiye's nationally determined contributions under the Paris Agreement and the net-zero objectives of the power generation sector. While the Erzin Combined Cycle Gas Turbine (CCGT) power plant remains an operational asset, Akenerji aims to progressively lower the carbon intensity of its portfolio by increasing renewable generation capacity, in accordance with SDA benchmarks for the power sector.

(7.53.2.86) Target objective

Akenerji has set a target to reduce its Scope 1 and Scope 2 greenhouse gas emissions by 50% by 2030, relative to the 2021 base year. The primary source of Scope 1 emissions is the Erzin Natural Gas Combined Cycle Power Plant, which accounts for the vast majority of direct emissions. Scope 2 emissions are primarily associated with the purchase of electricity for operational needs. This target reflects Akenerji's commitment to aligning with international climate goals, including the objectives of the Paris Agreement, and supports the broader decarbonization of the energy sector. By focusing on its most material emission sources, Akenerji aims to drive impactful reductions through a combination of fuel switching, increased investment in renewable energy, and energy efficiency initiatives.

(7.53.2.87) Plan for achieving target, and progress made to the end of the reporting year

Akenerji plans to achieve its emissions intensity target by increasing the share of renewable energy in its generation portfolio, implementing energy efficiency measures, optimizing operational processes and evaluating lower-carbon technologies. Progress against the target is monitored annually based on Scope 1 and Scope 2 emissions intensity per MWh of electricity generated. During the reporting year, emissions intensity remained above the base-year level due to changes in electricity generation and operational conditions. The target remains underway, and Akenerji continues to review its performance and implement relevant renewable energy, energy efficiency and operational improvement measures in support of its 2030 target.

(7.53.2.88) Target derived using a sectoral decarbonization approach

Select from:

☑ Yes

[Add row]

(7.54) Did you have any other climate-related targets that were active in the reporting year?

Select all that apply

☑ Targets to increase or maintain low-carbon energy consumption or production

(7.54.1) Provide details of your targets to increase or maintain low-carbon energy consumption or production.

Row 1

(7.54.1.1) Target reference number

Select from:

☑ Low 3

(7.54.1.2) Date target was set

12/31/2025

(7.54.1.3) Target coverage

Select from:

☑ Business activity

(7.54.1.4) Target type: energy carrier

Select from:

☑ Electricity

(7.54.1.5) Target type: activity

Select from:

☑ Production

(7.54.1.6) Target type: energy source

Select from:

☑ Renewable energy source(s) only

(7.54.1.7) End date of base year

12/31/2025

(7.54.1.8) Consumption or production of selected energy carrier in base year (MWh)

401680.952

(7.54.1.9) % share of low-carbon or renewable energy in base year

10.65

(7.54.1.10) End date of target

12/31/2026

(7.54.1.11) % share of low-carbon or renewable energy at end date of target

17

(7.54.1.12) % share of low-carbon or renewable energy in reporting year

10.65

(7.54.1.13) % of target achieved relative to base year

0.00

(7.54.1.14) Target status in reporting year

Select from:
☑ New

(7.54.1.16) Is this target part of an emissions target?

Yes, it is a part of an emissions target.

(7.54.1.17) Is this target part of an overarching initiative?

Select all that apply

☑ No, it's not part of an overarching initiative

(7.54.1.19) Explain target coverage and identify any exclusions

The target covers renewable electricity production from Akenerji's seven operating hydroelectric power plants and the Ayyıldız Onshore Wind Power Plant. Renewable electricity production is calculated as the combined gross electricity generation from hydropower and onshore wind facilities and is assessed as a proportion of total gross electricity generation from Akenerji's power plants. Natural gas-based electricity generation is excluded because it is not classified as renewable energy. The target continues the strategic direction of the renewable electricity production target reported in the previous CDP disclosure. As the previous target ended in 2024 and the updated target has a new base year, target year and target share, it is reported under the new reference number Low 3. In 2025, renewable electricity production amounted to 401,680.952 MWh, representing 10.65% of total gross electricity generation, reported as approximately 11% on a rounded basis. Akenerji aims to increase this share to at least 17% in 2026.

(7.54.1.20) Target objective

The objective of the target is to increase the share of renewable sources in Akenerji's electricity generation portfolio and support the reduction of the carbon intensity of electricity production. The target supports Akenerji's renewable portfolio development, generation mix diversification and broader climate strategy by increasing electricity generation from hydropower and onshore wind sources.

(7.54.1.21) Plan for achieving target, and progress made to the end of the reporting year

Akenerji plans to pursue the target through renewable energy investments, portfolio optimization, operational improvements and the development of hybrid renewable energy projects. Progress is monitored annually based on renewable electricity generation and its share in total gross electricity generation. In 2025, renewable electricity production represented approximately 11% of total gross electricity generation. Akenerji continues to evaluate opportunities to increase renewable generation and strengthen the contribution of renewable sources to its generation portfolio in support of the 2026 target.
[Add row]

(7.55) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.

	Emissions reduction initiatives that were active within the reporting year
	Select from: ☑ Yes

[Fixed row]

(7.55.1) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e
Under investigation	*1*	
To be implemented	*0*	*0*
Implementation commenced	*1*	*6964.2*
Implemented	*0*	*0*
Not to be implemented	*1*	

[Fixed row]

(7.55.3) What methods do you use to drive investment in emissions reduction activities?

Row 1

(7.55.3.1) Method

Select from:

☑ Financial optimization calculations

(7.55.3.2) Comment

Akenerji evaluates proposed energy efficiency, renewable energy and operational improvement initiatives by considering their technical feasibility, expected operational benefits, environmental contribution and financial implications. These evaluations support the prioritization of investments that can improve resource efficiency, reduce emissions and contribute to the long-term performance of the generation portfolio.

Row 2

(7.55.3.1) Method

Select from:

☑ Internal incentives/recognition programs

(7.55.3.2) Comment

Monetary performance evaluations are applied to employees responsible for project development, implementation, and corporate environmental sustainability. Additionally, an environmental improvement suggestion system is in place, encouraging employees to contribute ideas for enhancing the company's environmental performance, with monetary rewards provided for implemented suggestions.

Row 3

(7.55.3.1) Method

Select from:

☑ Employee engagement

(7.55.3.2) Comment

Akenerji conducts environmental sustainability, climate change, greenhouse gas and energy efficiency training and awareness activities to strengthen employee participation in emissions management. These activities support the identification of improvement opportunities and the effective implementation of energy efficiency and operational optimization measures across the organization.

Row 4

(7.55.3.1) Method

Select from:

☑ Dedicated budget for energy efficiency

(7.55.3.2) Comment

Akenerji allocates environmental expenditure to emissions and carbon management activities. In 2025, emissions and carbon management represented 12.77% of total environmental expenditure. This expenditure supports the monitoring and management of greenhouse gas emissions and relevant energy efficiency, renewable energy and operational improvement activities.

Row 5

(7.55.3.1) Method

Select from:

☑ Compliance with regulatory requirements/standards

(7.55.3.2) Comment

Akenerji uses regulatory requirements and management system standards to identify and prioritize emissions reduction opportunities. Energy performance and improvement opportunities are managed across the power plants through the ISO 50001:2018 Energy Management System, while greenhouse gas inventories are calculated and monitored using the applicable emissions monitoring framework and ISO 14064-based processes. Energy assessments are used to identify priority areas and inform annual improvement actions.
[Add row]

(7.58) Describe your organization’s efforts to reduce methane emissions from your activities.

At the Erzin Natural Gas Combined Cycle Power Plant, Akenerji manages greenhouse gas emissions associated with natural gas consumption through its emissions monitoring, reporting and operational management processes. Erzin NGCCPP is Akenerji’s only natural gas-fired power generation facility and represents the company’s principal operational connection to methane. Natural gas consumption and the associated greenhouse gas emissions are monitored through Akenerji’s annual Scope 1 inventory and applicable assurance processes. Akenerji does not have a formal methane-specific emissions reduction target at this stage, as methane has not been identified as a separate material emissions source within the company’s electricity generation activities. The company does not conduct natural gas extraction or processing activities and does not operate upstream or midstream oil and gas assets. No methane-specific collaborative initiative or voluntary methane reduction program was identified for the reporting year. As a company-specific example, Erzin NGCCPP’s emissions are monitored at facility level and consolidated into Akenerji’s organization-wide Scope 1 inventory. In 2025, the plant’s reported Scope 1 emissions amounted to 1,220,896.8 tCO_2e. These data

are used to monitor annual emissions performance and support operational efficiency and emissions management actions. Akenerji will continue to monitor methane-related sources and assess additional measures where operational significance or regulatory developments require a dedicated approach.

(7.74) Do you classify any of your existing goods and/or services as low-carbon products?

Select from:

☑ Yes

(7.74.1) Provide details of your products and/or services that you classify as low-carbon products.

Row 1

(7.74.1.1) Level of aggregation

Select from:

☑ Group of products or services

(7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:

☑ Other, please specify :Renewable Energy Generation

(7.74.1.3) Type of product(s) or service(s)

Power

☑ Hydropower

(7.74.1.4) Description of product(s) or service(s)

Recognizing the critical importance of renewable energy for the global future, Akenerji has prioritized the continuation of renewable energy investments as a core strategic objective. Accordingly, all activities are conducted with a focus on expanding renewable capacity within a sustainable business model. Akenerji produces renewable electricity through seven operating hydroelectric power plants. As of the end of 2025, Akenerji's renewable generation portfolio consisted of 292 MW of hydroelectric capacity. During the reporting year, gross electricity generation amounted to 319,010 MWh from hydropower. These renewable electricity products support the diversification of Akenerji's generation portfolio and its broader objective of reducing the carbon intensity of electricity generation. Akenerji also continued to evaluate renewable portfolio expansion opportunities, including the Erzin NGCCPP hybrid solar power plant and the Burç Bendi HEPP hybrid power plant project.

(7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

Select from:

☑ No

(7.74.1.13) Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year

1

Row 2

(7.74.1.1) Level of aggregation

Select from:

☑ Product or service

(7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:

☑ Other, please specify :I-REC, Verified Carbon Standard (VCS), Gold Standard (GS)

(7.74.1.3) Type of product(s) or service(s)

Power

☑ Other power, please specify :Renewable energy and voluntary carbon certificates, Verified Carbon Standard (VCS), Gold Standard (GS)

(7.74.1.4) Description of product(s) or service(s)

Akenerji offers environmental attributes generated through its eligible renewable electricity production to customers through the I-REC and voluntary carbon reduction certification systems, including the Verified Carbon Standard and Gold Standard. These certificates provide customers with documented renewable electricity attributes or verified emission reduction units in accordance with the rules of the relevant certification mechanism. In 2025, Akenerji sold approximately 200,000 MWh of I-REC certificates and 50,000 tonnes of Verra certificates generated through its registered renewable power plants. Akenerji plans to continue certificate sales in line with developments in carbon markets, regulatory changes and customer demand.

(7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

Select from:

☑ No

(7.74.1.13) Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year

1

Row 3

(7.74.1.1) Level of aggregation

Select from:

☑ Product or service

(7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:

☑ Other, please specify :Energy Management and Renewable Energy Services for Efficiency

(7.74.1.3) Type of product(s) or service(s)

Power

☑ Other power, please specify :Energy management, optimization and renewable energy services for efficiency

(7.74.1.4) Description of product(s) or service(s)

Akenerji provides energy management, optimization, engineering, implementation, asset management, operation and maintenance services to industrial and commercial customers. These services are designed to support customers in improving energy efficiency, optimizing energy costs, strengthening operational performance and developing their own generation infrastructure. In 2025, Akenerji continued to provide engineering and implementation services for energy projects and operation and maintenance services for rooftop solar power plants implemented at the Akasya and Akbatı shopping malls. Akenerji also provided testing and commissioning services for energy projects in Türkiye. Through these activities, Akenerji supports the efficient use of energy resources and the development and effective operation of lower-carbon electricity infrastructure.

(7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

Select from:

☑ No

(7.74.1.13) Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year

1

Row 4

(7.74.1.1) Level of aggregation

Select from:

☑ Group of products or services

(7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:

☑ Other, please specify :Renewable Energy Generation

(7.74.1.3) Type of product(s) or service(s)

Power

☑ Onshore wind

(7.74.1.4) Description of product(s) or service(s)

Recognizing the critical importance of renewable energy for the global future, Akenerji has prioritized the continuation of renewable energy investments as a core strategic objective. Accordingly, all activities are conducted with a focus on expanding renewable capacity within a sustainable business model. Akenerji produces renewable electricity through seven operating the Ayyıldız Wind Power Plant. As of the end of 2025, Akenerji's renewable generation portfolio consisted of 28.2 MW of onshore wind capacity. During the reporting year, gross electricity generation amounted to 82,670 MWh from onshore wind. These renewable electricity products support the diversification of Akenerji's generation portfolio and its broader objective of reducing the carbon intensity of electricity generation. Akenerji also continued to evaluate renewable portfolio expansion opportunities, including the Erzin NGCCPP hybrid solar power plant and the Burç Bendi HEPP hybrid power plant project.

(7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

Select from:

☑ No

(7.74.1.13) Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year

1

[Add row]

(7.79) Has your organization retired any project-based carbon credits within the reporting year?

Select from:

☑ No

C9. Environmental performance - Water security

(9.1) Are there any exclusions from your disclosure of water-related data?

Select from:

☑ No

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

Water withdrawals – total volumes

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Continuously

(9.2.3) Method of measurement

Water withdrawals are monitored at facility level across Akenerji's operations. Volumes are measured through on-site metering systems where available and calculated using official supplier, local authority or facility records where applicable. 2025 disclosures cover Erzin NGCCGT, Ayyıldız WPP and all HEPPs.

(9.2.4) Please explain

Akenerji measures and monitors total water withdrawals across 100% of its power generation facilities. Facilities refer to Erzin NGCCGT, Ayyıldız WPP and the HEPPs: Uluabat, Feke I, Feke II, Himmetli, Gökkaya, Burç Bendi and Bulam. In 2025, water withdrawal volumes were reported at facility level for all these sites. Water sources include seawater, groundwater, municipal water and spring water. No facility is excluded, as withdrawal data is collected and reported for each operational power generation facility.

Water withdrawals – volumes by source

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Continuously

(9.2.3) Method of measurement

Seawater, groundwater and source water withdrawals are measured through on-site meters. Municipal water supplied by ASKİ is monitored through official invoices and facility records. In 2025, withdrawal volumes were reported by source for Erzin NGCCGT, Ayyıldız WPP and all HEPPs.

(9.2.4) Please explain

Water withdrawals by source are monitored at all Akenerji power generation facilities. In 2025, Erzin NGCCGT reported seawater withdrawals; Ayyıldız WPP, Uluabat HPP, Feke II HEPP and Burç Bendi HEPP reported groundwater withdrawals; Feke I HEPP, Himmetli HEPP and Gökkaya HEPP reported municipal water supplied by ASKİ; and Bulam HEPP reported source water withdrawals. Seawater, groundwater and source water are monitored through on-site meters, while municipal water is tracked through official invoices and facility records. No facility is excluded, as water withdrawal data by source is collected and reported for each operational power generation facility.

Water withdrawals quality

(9.2.1) % of sites/facilities/operations

Select from:

☑ 76-99

(9.2.2) Frequency of measurement

Select from:

☑ Continuously

(9.2.3) Method of measurement

At Erzin NGCCGT, water withdrawal quality is continuously monitored for temperature, pH, total phosphorus, total coliform, fecal coliform, ammonia (NH_3), suspended solids, dissolved oxygen, BOD_5, and salinity. Water withdrawal quality is not monitored at Ayyıldız WPP and HEPPs because water quality parameters are not required for their operational processes.

(9.2.4) Please explain

Akenerji monitors water withdrawal quality at Erzin NGCCGT, where seawater is used in operational processes and wastewater is managed through the on-site treatment plant before discharge to the sea. The monitored parameters cover the key quality indicators required to support safe operation and regulatory compliance, including physical, chemical and microbiological parameters. Water quality monitoring is not applied at Ayyıldız WPP and HEPPs because these facilities do not use water as process water.

Water discharges – total volumes

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Continuously

(9.2.3) Method of measurement

At Erzin NGCCGT, discharge volumes are continuously monitored using on-site wastewater monitoring systems, including the Continuous Wastewater Monitoring System. At Ayyıldız WPP and HEPPs, domestic wastewater is collected in septic tanks and removed by licensed contractors for disposal, with volumes recorded and monitored at facility level.

(9.2.4) Please explain

Water discharge volumes are measured and monitored across 100% of Akenerji's power generation facilities. At Erzin NGCCGT, treated wastewater is discharged into the Mediterranean Sea, and discharge data is continuously monitored through the Continuous Wastewater Monitoring System. The data is simultaneously monitored by the Ministry of Environment, Urbanization and Climate Change. At Ayyıldız WPP and HEPPs, domestic wastewater is collected in septic tanks and removed by licensed contractors for disposal in accordance with regulatory requirements. The volumes withdrawn from the septic tanks and the related removal activities are recorded at facility level. No facility is excluded from water discharge volume monitoring.

Water discharges – volumes by destination

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Continuously

(9.2.3) Method of measurement

Akenerji's Erzin NGCCGT has an on-site remote wastewater monitoring station, and discharge water data is simultaneously monitored by the Ministry of Environment, Urbanization and Climate Change.

(9.2.4) Please explain

Water discharge volumes by destination are measured and monitored across 100% of Akenerji's power generation facilities. At Erzin NGCCGT, treated wastewater is discharged into the Mediterranean Sea. Discharge water data is monitored through the on-site remote wastewater monitoring station and simultaneously followed by the Ministry of Environment, Urbanization and Climate Change. At Ayyıldız WPP and HEPPs, domestic wastewater is collected in septic tanks and removed by licensed contractors for disposal. The related processes are planned and recorded separately for each facility. No facility is excluded from monitoring.

Water discharges – volumes by treatment method

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Continuously

(9.2.3) Method of measurement

Akenerji's Erzin NGCCGT has an on-site remote wastewater monitoring station, and discharge water data is simultaneously monitored by the Ministry of Environment, Urbanization and Climate Change.

(9.2.4) Please explain

Wastewater generated at Erzin NGCCGT is managed through the plant's on-site treatment facility before being discharged into the Mediterranean Sea in accordance with environmental permit requirements. Compliance is verified through regular internal monitoring of parameters such as pH, COD, BOD and suspended solids. Seawater required for plant processes undergoes reverse osmosis treatment before use. At Ayyıldız WPP and the HEPPs, wastewater is domestic in nature and is retained in septic tanks. Licensed contractors empty the tanks using vacuum trucks and dispose of the wastewater in accordance with regulatory requirements. Each removal is documented separately by facility.

Water discharge quality – by standard effluent parameters

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Continuously

(9.2.3) Method of measurement

Akenerji's Erzin NGCCGT has an on-site remote wastewater monitoring station, and discharge water data is simultaneously monitored by the Ministry of Environment, Urbanization and Climate Change.

(9.2.4) Please explain

At Erzin NGCCGT, process wastewater is treated in the on-site wastewater treatment plant before discharge. Seawater used in plant processes undergoes reverse osmosis treatment before use. Discharge quality is monitored for pH, temperature, total suspended solids, COD, BOD, oil and grease, total phosphorus, total cyanide, zinc and free chlorine through on-site systems and periodic laboratory analyses. Deep-sea discharge is monitored in accordance with environmental permit requirements. At Ayyıldız WPP and HEPPs, domestic wastewater is collected in septic tanks and removed by licensed contractors using vacuum trucks for disposal in accordance with regulatory requirements. These activities are recorded separately for each facility.

Water discharge quality – emissions to water (nitrates, phosphates, pesticides, and/or other priority substances)

(9.2.1) % of sites/facilities/operations

Select from:

☑ Not relevant

(9.2.4) Please explain

Erzin NGCCGT is Akenerji's only facility that discharges treated wastewater directly into a receiving environment. Nitrates, phosphates, pesticides and other priority substances are not characteristic of the plant's wastewater discharge profile. Nevertheless, total phosphorus and nitrate levels are assessed as part of seawater quality monitoring in accordance with environmental requirements. At Ayyıldız WPP and the HEPPs, domestic wastewater is retained in septic tanks and removed by licensed contractors using vacuum trucks for disposal; therefore, these facilities do not discharge wastewater directly into a receiving environment.

Water discharge quality – temperature

(9.2.1) % of sites/facilities/operations

Select from:

☑ 76-99

(9.2.2) Frequency of measurement

Select from:

☑ Continuously

(9.2.3) Method of measurement

Akenerji's Erzin NGCCGT has an on-site remote wastewater monitoring station, through which discharge water data, is simultaneously monitored by the Ministry of Environment, Urbanization and Climate Change.

(9.2.4) Please explain

At Erzin NGCCGT, seawater is used for both withdrawal and discharge. In accordance with the plant's environmental permit, discharge temperature and other applicable effluent parameters are continuously monitored against prescribed limits. Temperature monitoring is not required at Ayyıldız WPP and HEPPs, where domestic wastewater is collected in septic tanks and removed by licensed contractors.

Water consumption – total volume

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Continuously

(9.2.3) Method of measurement

Total water consumption is determined using facility-level water withdrawal and discharge data obtained from on-site meters, official invoices and facility records.

(9.2.4) Please explain

Total water consumption is measured and monitored across 100% of Akenerji's power generation facilities. For each facility, consumption is determined using the difference between recorded water withdrawal and discharge volumes. In 2025, facility-level water consumption data was reported for Erzin NGCCGT, Ayyıldız WPP and all HEPPs. No facility is excluded from monitoring.

Water recycled/reused

(9.2.1) % of sites/facilities/operations

Select from:

☑ 76-99

(9.2.2) Frequency of measurement

Select from:

☑ Continuously

(9.2.3) Method of measurement

Total recycled and reused water volumes are continuously monitored using on-site meters. At Erzin NGCCGT, meters integrated into the closed-loop cooling system measure the volume of cooling water recirculated within the process.

(9.2.4) Please explain

Erzin NGCCGT uses a recirculating closed-loop cooling system that retains and reuses cooling water within the process rather than discharging it after a single use. Recycled and reused water volumes are continuously monitored using on-site meters integrated into the cooling water system.

The provision of fully-functioning, safely managed WASH services to all workers

(9.2.1) % of sites/facilities/operations

Select from:

☑ 76-99

(9.2.2) Frequency of measurement

Select from:

☑ At least once a year

(9.2.3) Method of measurement

Water use associated with WASH services is measured through on-site meters at the facility where separate monitoring is conducted.

(9.2.4) Please explain

At Akenerji, fully-functioning, safely managed WASH services are provided to all workers across its power generation facilities. Water use associated with WASH services is measured through on-site meters at the facility where separate WASH monitoring is conducted, and this WASH-related water use is monitored at least once a year. At Erzin NGCCGT, WASH-related water use is not metered separately from the facility's other water flows; therefore, it is not reported under a dedicated

WASH measurement at this site. The reported percentage reflects the availability of fully-functioning WASH services across the facilities, while the measurement frequency refers specifically to the separate monitoring of WASH-related water use where this is carried out.
[Fixed row]

(9.2.1) For your hydropower operations, what proportion of the following water aspects are regularly measured and monitored?

Fulfilment of downstream environmental flows

(9.2.1.1) % of sites/facilities/operations measured and monitored

Select from:
☑ 100%

(9.2.1.2) Please explain

Downstream environmental flows are continuously measured and monitored at all Akenerji facilities where environmental flow requirements apply. The minimum flow required to be maintained in the downstream riverbed is monitored through online systems in accordance with regulatory requirements. Environmental flow data is also monitored by the Ministry of Environment, Urbanization and Climate Change.

Sediment loading

(9.2.1.1) % of sites/facilities/operations measured and monitored

Select from:
☑ 100%

(9.2.1.2) Please explain

All Akenerji HEPPs track reservoir sediment levels on an ongoing basis as part of their operational controls. This monitoring provides full coverage of the facilities included in the assessment.

Other, please specify

(9.2.1.1) % of sites/facilities/operations measured and monitored

Select from:

☑ Not relevant

(9.2.1.2) Please explain

Not applicable.
[Fixed row]

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

Total withdrawals

(9.2.2.1) Volume (megaliters)

15101.12

(9.2.2.2) Comparison with previous reporting year

Select from:

☑ Higher

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.2.4) Five-year forecast

Select from:

☑ Lower

(9.2.2.5) Primary reason for forecast

Select from:

☑ Increase/decrease in efficiency

(9.2.2.6) Please explain

In 2025, Akenerji's total water withdrawal was 15,101.119 ML, compared with the revised 2024 total of 13,211.897 ML, representing an increase of approximately 14.3%. The increase was primarily driven by higher seawater withdrawal at Erzin NGCCGT, which rose from 13,207.548 ML to 15,094.517 ML due to changes in operational activity. Total withdrawal was compiled by aggregating facility-level data for Erzin NGCCGT, Ayyıldız WPP and all HEPPs. Data is obtained from on-site meters and official supplier records, depending on the water source and facility. Akenerji classifies changes of 0–15% as "higher" or "lower" and changes above 15% as "much higher" or "much lower". The same thresholds are applied to the five-year forecast. Total withdrawals are expected to be lower over the next five years, based on the assumption that operational improvements, efficiency measures and water management practices will reduce water demand under business-as-usual conditions. The reported total includes measured data and values derived from official supplier records. As no quantified uncertainty range has been established, an uncertainty percentage is not reported. The 2024 figure was revised based on the 2024 water footprint verification report.

Total discharges

(9.2.2.1) Volume (megaliters)

12518.74

(9.2.2.2) Comparison with previous reporting year

Select from:

☑ Higher

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.2.4) Five-year forecast

Select from:

☑ Lower

(9.2.2.5) Primary reason for forecast

Select from:

☑ Increase/decrease in efficiency

(9.2.2.6) Please explain

In 2025, Akenerji's total water discharge was 12,518.735 ML, compared with the revised 2024 total of 11,220.683 ML, representing an increase of approximately 11.6%. The increase was primarily driven by changes in operational activity at Erzin NGCCGT, where discharge volumes increased from 11,219.793 ML in 2024 to 12,517.553 ML in 2025. Total discharge was calculated by aggregating facility-level data from Erzin NGCCGT, Ayyıldız WPP and all HEPPs. At Erzin NGCCGT, discharge volumes are monitored through on-site wastewater monitoring systems. At Ayyıldız WPP and the HEPPs, domestic wastewater volumes are recorded based on septic tank removal records. Akenerji classifies changes of 0–15% as "higher" or "lower" and changes exceeding 15% as "much higher" or "much lower". The same thresholds are applied to the five-year forecast. Total discharge is expected to be lower over the next five years, based on the assumption that operational improvements and efficiency measures will reduce water use and associated discharge volumes under business-as-usual conditions. The reported total is based on facility-level measurements and records. No quantified uncertainty range has been established. The 2024 figure was revised based on the 2024 water footprint verification report.

Total consumption

(9.2.2.1) Volume (megaliters)

2582.38

(9.2.2.2) Comparison with previous reporting year

Select from:

☑ Much higher

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.2.4) Five-year forecast

Select from:

☑ Lower

(9.2.2.5) Primary reason for forecast

Select from:

☑ Increase/decrease in efficiency

(9.2.2.6) Please explain

In 2025, Akenerji's total water consumption was 2,582.384 ML, compared with the revised 2024 total of 1,991.214 ML, representing an increase of approximately 29.7%. The increase was primarily driven by changes in operational activity at Erzin NGCCGT, where water consumption increased from 1,987.755 ML in 2024 to 2,576.964 ML in 2025. Total consumption was compiled by aggregating facility-level consumption data for Erzin NGCCGT, Ayyıldız WPP and all HEPPs. The 2024 data was revised based on the 2024 water footprint verification report. Akenerji classifies changes of 0–15% as "higher" or "lower" and changes exceeding 15% as "much higher" or "much lower". The same thresholds are applied to the five-year forecast. Accordingly, the 29.7% year-on-year increase is classified as "much higher". Total water consumption is expected to be lower over the next five years, based on the assumption that operational improvements, efficiency measures and water management practices will reduce water demand under business-as-usual conditions. The reported total is based on facility-level consumption data. No quantified uncertainty range has been established; therefore, an uncertainty percentage is not reported.
[Fixed row]

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

(9.2.4.1) Withdrawals are from areas with water stress

Select from:

☑ Yes

(9.2.4.2) Volume withdrawn from areas with water stress (megaliters)

3.93

(9.2.4.3) Comparison with previous reporting year

Select from:

☑ Higher

(9.2.4.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.4.5) Five-year forecast

Select from:

☑ Lower

(9.2.4.6) Primary reason for forecast

Select from:

☑ Increase/decrease in efficiency

(9.2.4.7) % of total withdrawals that are withdrawn from areas with water stress

0.03

(9.2.4.8) Identification tool

Identification tool used

☑ WRI Aqueduct

(9.2.4.9) Please explain

According to the WRI Aqueduct Water Risk Atlas (water stress layer), Akenerji's withdrawal locations are assessed annually against the "High" baseline water stress threshold (40–80%). Consistent with the reporting boundary applied in the previous reporting year, this assessment covers Akenerji's nine core power generation plants. In the reporting year, total water withdrawal at Akenerji amounted to 3.61 ML of municipal/surface water, 2.93 ML of groundwater, and 15,094.46 ML of seawater, for a total of 15,101 ML. For the purpose of assessing withdrawals from stressed sources, only inland freshwater (groundwater and surface water) withdrawals are considered, as seawater withdrawn at Erzin NGCCPP is a coastal, non-freshwater source excluded from this figure in line with CDP guidance. Based on the WRI Aqueduct assessment, approximately 3.931 ML of inland freshwater withdrawn at facilities located in stressed catchments is classified as water withdrawn

from a water-stressed area, representing approximately 0.03% of total withdrawals. These volumes relate to water used for domestic purposes at the relevant facilities. Akenerji applies consistent thresholds across the comparison and forecast, defining a change greater than 20% as "much higher/much lower", 5–20% as "higher/lower", and below 5% as "about the same". The comparison with the previous reporting year is reported as "higher", reflecting changes in business activity and generation profile across the reporting period. Five-year operational forecasts anticipate improved process efficiency through ongoing optimization of cooling systems, heat-rate performance, and water-use intensity. These measures are expected to further reduce specific water withdrawal per megawatt-hour generated. [Fixed row]

(9.2.7) Provide total water withdrawal data by source.

Fresh surface water, including rainwater, water from wetlands, rivers, and lakes

(9.2.7.1) Relevance

Select from:

☑ Not relevant

(9.2.7.5) Please explain

There is no fresh surface water use at Akenerji.

Brackish surface water/Seawater

(9.2.7.1) Relevance

Select from:

☑ Relevant

(9.2.7.2) Volume (megaliters)

15094.52

(9.2.7.3) Comparison with previous reporting year

Select from:

☑ Higher

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.7.5) Please explain

The total seawater volume is withdrawn at Erzin NGCCPP and used as cooling water. Seawater withdrawal increased from 13,207.53 ML in the previous reporting year to 15,094.46 ML, an increase of approximately 14.3%, driven by higher generation activity at the plant during the reporting period. Volumes are obtained from calibrated on-site metering (direct measurement). Akenerji applies consistent thresholds, defining a change greater than 20% as "much higher/much lower", 5–20% as "higher/lower", and below 5% as "about the same"; accordingly, this change is classified as "higher".

Groundwater – renewable

(9.2.7.1) Relevance

Select from:

☑ Relevant

(9.2.7.2) Volume (megaliters)

2.93

(9.2.7.3) Comparison with previous reporting year

Select from:

☑ Much higher

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.7.5) Please explain

Renewable groundwater is withdrawn via on-site calibrated meters at Ayyıldız WPP and certain HPPs (Bulam, Burç, Uluabat) for domestic and operational purposes. The volume increased from 0.4 ML in the previous reporting year to 2.931 ML, driven by expanded metering coverage and higher on-site water use across facilities. In line with Akenerji's consistent thresholds (change greater than 20% classified as "much higher"), this change is classified as "much higher". Volumes are based on direct measurement.

Groundwater – non-renewable

(9.2.7.1) Relevance

Select from:

☑ Not relevant

(9.2.7.5) Please explain

There is no renewable groundwater sources use at Akenerji.

Produced/Entrained water

(9.2.7.1) Relevance

Select from:

☑ Not relevant

(9.2.7.5) Please explain

There is no produced/entrained water use at Akenerji.

Third party sources

(9.2.7.1) Relevance

Select from:

☑ Relevant

(9.2.7.2) Volume (megaliters)

3.8

(9.2.7.3) Comparison with previous reporting year

Select from:

☑ About the same

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in efficiency

(9.2.7.5) Please explain

Third party sources comprise municipal/network water supplied to facilities for domestic use. The volume was 3.804 ML in the reporting year compared with 3.97 ML in the previous reporting year, a decrease of approximately 4.2%. In line with Akenerji's consistent thresholds (change below 5% classified as "about the same"), this change is classified as "about the same". The stable level reflects continued employee awareness and the use of water-efficient equipment. Volumes are based on official invoices from municipal suppliers.
[Fixed row]

(9.2.8) Provide total water discharge data by destination.

Fresh surface water

(9.2.8.1) Relevance

Select from:

☑ Not relevant

(9.2.8.5) Please explain

No discharges have been made to fresh surface water sources.

Brackish surface water/seawater

(9.2.8.1) Relevance

Select from:

☑ Relevant

(9.2.8.2) Volume (megaliters)

12517.55

(9.2.8.3) Comparison with previous reporting year

Select from:

☑ Higher

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.8.5) Please explain

Brackish surface water/seawater is relevant because treated wastewater from Erzin NGCCGT is discharged to seawater. The volume discharged to this destination increased from 11,219.793 ML in 2024 to 12,517.553 ML in 2025, representing an increase of approximately 11.6% due to changes in business activity. The reported volumes are based on direct measurements from on-site monitoring systems and are not estimated or modelled. Akenerji classifies changes of 0–15% as "higher" or "lower" and changes exceeding 15% as "much higher" or "much lower". Accordingly, the change is classified as "higher".

Groundwater

(9.2.8.1) Relevance

Select from:

☑ Not relevant

(9.2.8.5) Please explain

No discharges have been made to groundwater water sources.

Third-party destinations

(9.2.8.1) Relevance

Select from:
☑ Relevant

(9.2.8.2) Volume (megaliters)

1.18

(9.2.8.3) Comparison with previous reporting year

Select from:
☑ Much higher

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:
☑ Increase/decrease in business activity

(9.2.8.5) Please explain

Third-party destinations are relevant because domestic wastewater generated at Ayyıldız WPP and the HEPPs is collected in septic tanks and removed by licensed contractors for disposal. The volume transferred to third-party destinations increased from 0.890 ML in 2024 to 1.182 ML in 2025, representing an increase of approximately 32.8% due to changes in business activity. Volumes are recorded at facility level based on septic tank removal records. Akenerji classifies changes exceeding 15% as “much higher” or “much lower”; therefore, the year-on-year increase is classified as “much higher”.
[Fixed row]

(9.2.9) Indicate the highest level to which your wastewater is treated (either by your organization or a third party) before being discharged to the environment.

Quaternary treatment

(9.2.9.1) Volume (megaliters)

0

(9.2.9.6) Please explain

No wastewater is treated to quaternary level.

Tertiary treatment

(9.2.9.1) Volume (megaliters)

0

(9.2.9.6) Please explain

No wastewater is classified as receiving tertiary treatment as its highest treatment level.

Secondary treatment

(9.2.9.1) Volume (megaliters)

12518.73

(9.2.9.2) Comparison of treated volume with previous reporting year

Select from:
☑ Higher

(9.2.9.3) Primary reason for comparison with previous reporting year

Select from:
☑ Increase/decrease in business activity

(9.2.9.4) % of discharge volume treated in compliance with local regulatory standards

Select from:

☑ 100

(9.2.9.5) Factors considered in determining appropriate treatment level beyond local regulatory standards

Select all that apply

☑ Sector-specific standards

☑ Profile of the receiving waterbody

(9.2.9.6) Please explain

At Erzin NGCCPP, industrial and domestic wastewater is treated in the on-site wastewater treatment plant before deep-sea discharge into the sea, in accordance with the facility's environmental permit and applicable national requirements. Treatment processes include suspended solids removal, neutralization and biological treatment. Discharges are continuously monitored through the Continuous Wastewater Monitoring System. Domestic wastewater from the HPPs and WPP is collected in septic tanks and transferred to municipal treatment plants, where it undergoes secondary treatment. The total volume classified under secondary treatment increased from 11,215.86 ML in the previous reporting year to 12,518.73 ML in the current reporting year, representing an increase of approximately 11.6%, primarily due to changes in generation and associated operational activity. Akenerji classifies changes above 20% as "much higher/much lower", changes between 5% and 20% as "higher/lower", and changes below 5% as "about the same". Accordingly, the change is classified as "higher". The treatment level reflects sector-specific requirements, the characteristics of the discharge and the profile of the receiving marine environment.

Primary treatment only

(9.2.9.1) Volume (megaliters)

0

(9.2.9.6) Please explain

No discharge is treated only to primary level as its highest level of treatment.

No treatment

(9.2.9.1) Volume (megaliters)

0

(9.2.9.6) Please explain

No wastewater is discharged to the environment without treatment. Wastewater generated across the reporting boundary is treated either by Akenerji or by authorized municipal treatment providers before discharge to the environment.

Unknown

(9.2.9.1) Volume (megaliters)

0

(9.2.9.6) Please explain

The treatment level of the entire reported discharge volume is identified and accounted for. Therefore, no discharge volume is reported under “Unknown”.
[Fixed row]

(9.3) In your direct operations and upstream value chain, what is the number of facilities where you have identified substantive water-related dependencies, impacts, risks, and opportunities?

Direct operations

(9.3.1) Identification of facilities in the value chain stage

Select from:
☑ Yes, we have assessed this value chain stage and identified facilities with substantive water-related dependencies, impacts, risks, and opportunities

(9.3.2) Total number of facilities identified

9

(9.3.3) % of facilities in direct operations that this represents

Select from:

☑ 100%

(9.3.4) Please explain

Akenerji assessed water-related dependencies, impacts, risks and opportunities across all nine power generation facilities, representing 100% of its direct operations. The assessment covers seven HEPPs, Ayyıldız WPP and Erzin NGCCGT. Facility-level differences in water use, water dependency and exposure to physical water risks were considered to reflect the characteristics and locations of each asset. In 2025, the assessment was reviewed in light of sector developments, global trends and the outcomes of company workshops. WWF Water Risk Filter and WRI Aqueduct Water Risk Atlas were used to analyze physical water risks at water-dependent facilities, while TCFD guidance supported the assessment of physical and transition risks and ISSB guidance informed the consideration of nature-related dependencies, ecosystem services, biodiversity and natural resource management. The findings are incorporated into Akenerji's risk inventory and support the prioritization, monitoring and integration of relevant risks and opportunities into risk management and strategic decision-making processes.

Upstream value chain

(9.3.1) Identification of facilities in the value chain stage

Select from:

☑ No, we have assessed this value chain stage but did not identify any facilities with substantive water-related dependencies, impacts, risks, and opportunities

(9.3.4) Please explain

In 2025, Akenerji assessed water-related dependencies, impacts, risks and opportunities across all nine facilities in its direct operations, representing 100% coverage. Akenerji defines a facility as an operational power generation site. The portfolio comprises seven HEPPs, one WPP and one NGCCGT. Facility-level DIRO assessments considered differences in technology, location, water source, water dependency and exposure to water stress and drought. WWF Water Risk Filter and WRI Aqueduct Water Risk Atlas were used to analyze physical water risks, supported by TCFD, TNFD and ISSB guidance and scenario analysis. Water-related dependencies and risks are particularly significant for the HEPP portfolio because electricity generation depends on precipitation and water availability. Four HEPPs, Feke I, Feke II, Gökkaya and Himmetli, with a combined capacity of 157 MW, are located in areas classified as extremely high water stress under WRI Aqueduct. The findings are incorporated into Akenerji's risk inventory and support production planning, risk management and strategic decision-making. Akenerji also assessed its upstream value chain at corporate level, considering water-related exposure associated with areas such as fuel supply, equipment procurement and contractor services. Although potential upstream exposure areas were identified, no individual upstream facility was assessed as meeting Akenerji's substantive threshold for water-related dependencies, impacts, risks or opportunities. Therefore, no upstream facility count or percentage is reported. Upstream exposure will continue to be reviewed through Akenerji's DIRO and risk management processes.
[Fixed row]

(9.3.1) For each facility referenced in 9.3, provide coordinates, water accounting data, and a comparison with the previous reporting year.

Row 1

(9.3.1.1) Facility reference number

Select from:

☑ Facility 1

(9.3.1.2) Facility name (optional)

Feke I HEPP

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Türkiye

☑ Other, please specify :Seyhan

(9.3.1.8) Latitude

37.82288

(9.3.1.9) Longitude

35.93285

(9.3.1.10) Located in area with water stress

Select from:

☑ Yes

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Hydropower

(9.3.1.13) Total water withdrawals at this facility (megaliters)

0.41

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ About the same

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0.41

(9.3.1.21) Total water discharges at this facility (megaliters)

0.24

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ About the same

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0.24

(9.3.1.27) Total water consumption at this facility (megaliters)

0.17

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ About the same

(9.3.1.29) Please explain

Feke I HEPP is a 30 MW run-of-river hydropower facility located in Adana within the Seyhan Basin. The facility has substantive water-related dependencies, impacts, risks and opportunities due to its reliance on hydrological conditions for electricity generation and its exposure to water stress and drought. Reported operational water volumes exclude river flows used for hydropower generation and relate to water entering the facility boundary for domestic and supporting operational purposes. Withdrawal volumes are based on third-party and municipal supply records, while domestic wastewater transferred to third-party treatment is recorded as discharge to a third-party destination. Total withdrawal was 0.40838 ML, total discharge was 0.24438 ML and total consumption was 0.16400 ML. Compared with the previous reporting year, all three values remained approximately stable. The volume classifications use the following thresholds: changes above 20% are “much higher/much lower”, changes between 5% and 20% are “higher/lower”, and changes below 5% are “about the same”.

Row 2

(9.3.1.1) Facility reference number

Select from:

☑ Facility 2

(9.3.1.2) Facility name (optional)

Feke II HEPP

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Türkiye

☑ Other, please specify :Seyhan

(9.3.1.8) Latitude

37.7442

(9.3.1.9) Longitude

35.86424

(9.3.1.10) Located in area with water stress

Select from:

☑ Yes

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Hydropower

(9.3.1.13) Total water withdrawals at this facility (megaliters)

0.17

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ Much lower

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0.17

(9.3.1.21) Total water discharges at this facility (megaliters)

0.09

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ Much higher

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0.09

(9.3.1.27) Total water consumption at this facility (megaliters)

0.08

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Much lower

(9.3.1.29) Please explain

Feke II HEPP is a 70 MW hydropower facility located in Adana within the Seyhan Basin. The facility has substantive water-related dependencies, impacts, risks and opportunities due to its reliance on hydrological availability and exposure to drought conditions. Operational water withdrawals reported in this table relate to third-party water used for domestic and supporting facility purposes and exclude river flows passing through the hydropower generation system. Total withdrawal was 0.16459 ML, total discharge to a third-party destination was 0.09059 ML and total consumption was 0.07400 ML. Compared with the previous reporting year, withdrawal and consumption were much lower, while discharge was much higher. The variation reflects changes in domestic and operational water use and the timing of septic-tank collection and transfer. Volumes are derived from supplier records and facility water-balance calculations.

Row 3

(9.3.1.1) Facility reference number

Select from:

☑ Facility 3

(9.3.1.2) Facility name (optional)

Himmetli HEPP

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Türkiye

☑ Other, please specify :Seyhan

(9.3.1.8) Latitude

37.87612

(9.3.1.9) Longitude

35.9983

(9.3.1.10) Located in area with water stress

Select from:

☑ Yes

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Hydropower

(9.3.1.13) Total water withdrawals at this facility (megaliters)

2.82

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ Much higher

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

2.82

(9.3.1.21) Total water discharges at this facility (megaliters)

0.29

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ About the same

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0.29

(9.3.1.27) Total water consumption at this facility (megaliters)

2.53

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Much higher

(9.3.1.29) Please explain

Himmetli HEPP is a 27 MW run-of-river hydropower facility located in Adana within the Seyhan Basin. The facility has substantive water-related dependencies, impacts, risks and opportunities because electricity generation depends on river flows and is exposed to water stress and drought. The reported withdrawal volume relates to third-party water used for domestic and supporting operational purposes and excludes river flows used for electricity generation. Total withdrawal was 2.82154 ML, total discharge to a third-party destination was 0.28654 ML and total consumption was 2.53500 ML. Compared with the previous reporting year, withdrawal and consumption were much higher, while discharge remained about the same. Volumes are based on supplier records, wastewater transfer records and the facility water balance.

Row 4

(9.3.1.1) Facility reference number

Select from:

☑ Facility 4

(9.3.1.2) Facility name (optional)

Gökkaya HEPP

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Türkiye

☑ Other, please specify :Seyhan

(9.3.1.8) Latitude

37.86135

(9.3.1.9) Longitude

36.07391

(9.3.1.10) Located in area with water stress

Select from:

☑ Yes

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Hydropower

(9.3.1.13) Total water withdrawals at this facility (megaliters)

0.25

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ Much lower

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0.25

(9.3.1.21) Total water discharges at this facility (megaliters)

0.22

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ Much higher

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0.22

(9.3.1.27) Total water consumption at this facility (megaliters)

0.03

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Much lower

(9.3.1.29) Please explain

Gökkaya HEPP is a 30 MW hydropower facility located in Adana within the Seyhan Basin. The facility has substantive water-related dependencies, impacts, risks and opportunities due to its dependence on hydrological conditions and exposure to water stress and drought. The reported withdrawal volume relates to third-party water used for domestic and supporting operational purposes, while river flows used for hydropower generation are excluded from this operational water balance. Total withdrawal was 0.25402 ML, total discharge to a third-party destination was 0.22202 ML and total consumption was 0.03200 ML. Compared with the previous reporting year, withdrawal and consumption were much lower, while discharge was much higher. The change reflects the balance between water supplied to the site and domestic wastewater transferred for treatment during the reporting year.

Row 5

(9.3.1.1) Facility reference number

Select from:

☑ Facility 5

(9.3.1.2) Facility name (optional)

Burç HEPP

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Türkiye

☑ Other, please specify :Ceyhan

(9.3.1.8) Latitude

37.46345

(9.3.1.9) Longitude

38.17085

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Hydropower

(9.3.1.13) Total water withdrawals at this facility (megaliters)

0.12

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ Much higher

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0.12

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.21) Total water discharges at this facility (megaliters)

0.07

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ Much higher

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0.07

(9.3.1.27) Total water consumption at this facility (megaliters)

0.05

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Lower

(9.3.1.29) Please explain

Burç HEPP is a 28 MW hydropower facility located in Adıyaman within the Ceyhan Basin. The facility has substantive water-related dependencies, impacts, risks and opportunities associated with hydrological availability and downstream environmental flow requirements. Operational water withdrawals comprise 0.12000 ML of renewable groundwater and 0.00096 ML of third-party water. River flows used for electricity generation are excluded from the operational water balance reported here. Total withdrawal was 0.12096 ML, total discharge to a third-party destination was 0.06886 ML and calculated consumption was 0.05210 ML. Compared with the

previous reporting year, withdrawal and discharge were much higher, while consumption was lower. Groundwater volumes are directly metered and third-party volumes are based on supplier records.

Row 6

(9.3.1.1) Facility reference number

Select from:

☑ Facility 6

(9.3.1.2) Facility name (optional)

Bulam HEPP

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Türkiye

☑ Other, please specify :Ceyhan

(9.3.1.8) Latitude

37.97912

(9.3.1.9) Longitude

38.29615

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Hydropower

(9.3.1.13) Total water withdrawals at this facility (megaliters)

0.09

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ About the same

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0.08

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0.01

(9.3.1.21) Total water discharges at this facility (megaliters)

0.02

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ Much higher

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0.02

(9.3.1.27) Total water consumption at this facility (megaliters)

0.06

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Lower

(9.3.1.29) Please explain

Bulam HEPP is a 7 MW run-of-river hydropower facility located in Adıyaman within the Ceyhan Basin. The facility has substantive water-related dependencies, impacts, risks and opportunities due to its reliance on river flows, although the facility is not classified as being located in an area with high water stress under the applied WRI Aqueduct assessment. Operational withdrawals comprise 0.07590 ML of renewable groundwater and 0.00096 ML of third-party water. Total withdrawal was 0.07686 ML, total discharge to a third-party destination was 0.01486 ML and total consumption was 0.06200 ML. Withdrawal remained about the same, discharge was much higher and consumption was lower compared with the previous reporting year. Groundwater is directly metered and third-party water is monitored through supplier records.

Row 7

(9.3.1.1) Facility reference number

Select from:

☑ Facility 7

(9.3.1.2) Facility name (optional)

Uluabat HEPP

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Türkiye

☑ Other, please specify :Susurluk

(9.3.1.8) Latitude

40.15333

(9.3.1.9) Longitude

28.72394

(9.3.1.10) Located in area with water stress

Select from:

☑ Yes

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Hydropower

(9.3.1.13) Total water withdrawals at this facility (megaliters)

2.69

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ Much higher

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

2.68

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0.01

(9.3.1.21) Total water discharges at this facility (megaliters)

0.19

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ Much higher

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0.19

(9.3.1.27) Total water consumption at this facility (megaliters)

2.49

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Much higher

(9.3.1.29) Please explain

Uluabat HEPP is a 100 MW hydropower facility located in Bursa within the Susurluk Basin. The facility has substantive water-related dependencies, impacts, risks and opportunities associated with water availability, reservoir conditions and drought exposure. Operational withdrawals comprise 2.68100 ML of renewable groundwater and 0.00419 ML of third-party water. Water used for electricity generation is managed separately from the operational water balance reported here. Total withdrawal was 2.68519 ML, total discharge to a third-party destination was 0.19169 ML and total consumption was 2.49350 ML. All three values were much higher than in the previous reporting year. The increase primarily reflects higher recorded groundwater withdrawal and operational water use. Groundwater is directly measured through on-site metering.

Row 8

(9.3.1.1) Facility reference number

Select from:

☑ Facility 8

(9.3.1.2) Facility name (optional)

Erzin NGCCPP

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Türkiye

☑ Other, please specify :Erzin NGCCPP does not require a river basin designation, as it does not rely on freshwater from a river basin for its operations. Instead, the plant sources its cooling and process water from the Mediterranean Sea.

(9.3.1.8) Latitude

36.92839

(9.3.1.9) Longitude

36.05164

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Gas

(9.3.1.13) Total water withdrawals at this facility (megaliters)

15094.51

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ Higher

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

15094.46

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0.05

(9.3.1.21) Total water discharges at this facility (megaliters)

12517.55

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:
☑ Higher

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

12517.55

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

2576.96

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Much higher

(9.3.1.29) Please explain

Erzin NGCCPP is a 904 MW natural gas combined-cycle power plant located in Hatay near the Mediterranean coast. The facility has substantive water-related dependencies, impacts, risks and opportunities because its cooling and process systems depend on seawater availability and because temperature and water availability may affect cooling performance and generation efficiency. Total withdrawal was 15,094.51644 ML, comprising 15,094.46400 ML of seawater and 0.05244 ML of third-party water. Total discharge to seawater was 12,517.55219 ML and calculated consumption was 2,576.96424 ML. Withdrawals and discharges were higher than in the previous reporting year, while consumption was much higher, reflecting changes in generation activity and the associated cooling-water balance. Seawater withdrawals and discharges are directly monitored through on-site systems. The facility's discharge is managed in accordance with its environmental permit and monitoring requirements.

Row 9

(9.3.1.1) Facility reference number

Select from:

☑ Facility 9

(9.3.1.2) Facility name (optional)

Ayyıldız WPP

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Türkiye

☑ Other, please specify :The Ayyıldız Wind Power Plant (WPP) is located in the Eastern Black Sea Basin. While it does not rely on water resources from the basin, geographically it falls within the boundaries of this river basin.

(9.3.1.8) Latitude

40.35647

(9.3.1.9) Longitude

27.89369

(9.3.1.10) Located in area with water stress

Select from:

☑ Yes

(9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☑ Wind

(9.3.1.13) Total water withdrawals at this facility (megaliters)

0.06

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ Lower

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0.05

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0.01

(9.3.1.21) Total water discharges at this facility (megaliters)

0.06

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ Much higher

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0.06

(9.3.1.27) Total water consumption at this facility (megaliters)

0

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Much lower

(9.3.1.29) Please explain

Ayyıldız WPP is a 28 MW wind power facility located in Balıkesir within the Susurluk Basin. Water is not required for electricity generation, but limited volumes are used for domestic and supporting operational purposes. Withdrawals comprise 0.05410 ML of renewable groundwater and 0.01104 ML of third-party water. Total withdrawal was 0.06514 ML, total discharge to a third-party destination was 0.05914 ML and calculated consumption was 0.00600 ML. Compared with the previous reporting year, withdrawal was lower, discharge was much higher and consumption was much lower. Renewable groundwater is monitored using on-site metering. [Add row]

(9.3.2) For the facilities in your direct operations referenced in 9.3.1, what proportion of water accounting data has been third party verified?

Water withdrawals – total volumes

(9.3.2.1) % verified

Select from:

☑ 76-100

(9.3.2.2) Verification standard used

Select all that apply

☑ ISO 14046-1

Water withdrawals – volume by source

(9.3.2.1) % verified

Select from:

☑ 76-100

(9.3.2.2) Verification standard used

Select all that apply

☑ ISO 14046-1

Water withdrawals – quality by standard water quality parameters

(9.3.2.1) % verified

Select from:

☑ 76-100

(9.3.2.2) Verification standard used

Select all that apply

☑ Other, please specify :Third-party verification through accredited laboratories

Water discharges – total volumes

(9.3.2.1) % verified

Select from:

☑ 76-100

(9.3.2.2) Verification standard used

Select all that apply

☑ ISO 14046-1

Water discharges – volume by destination

(9.3.2.1) % verified

Select from:

☑ 76-100

(9.3.2.2) Verification standard used

Select all that apply

☑ ISO 14046-1

Water discharges – volume by final treatment level

(9.3.2.1) % verified

Select from:

☑ 76-100

(9.3.2.2) Verification standard used

Select all that apply

☑ ISO 14046-1

Water discharges – quality by standard water quality parameters

(9.3.2.1) % verified

Select from:

☑ 76-100

(9.3.2.2) Verification standard used

Select all that apply

☑ Other, please specify :Third-party verification through accredited laboratories

Water consumption – total volume

(9.3.2.1) % verified

Select from:
☑ 76-100

(9.3.2.2) Verification standard used

Select all that apply
☑ ISO 14046-1
[Fixed row]

(9.5) Provide a figure for your organization’s total water withdrawal efficiency.

(9.5.1) Revenue (currency)

573521981

(9.5.2) Total water withdrawal efficiency

37978.77

(9.5.3) Anticipated forward trend

From 2026 onward, Akenerji anticipates that its total water withdrawal efficiency will improve. This expectation is supported by the continued use of the reverse osmosis system at Erzin NGCCGT, which enables water recovery and supports more efficient use of water resources. However, the future value may vary depending on changes in revenue and operational water withdrawal requirements.
[Fixed row]

(9.7) Do you calculate water intensity for your electricity generation activities?

Select from:

☑ Yes

(9.7.1) Provide the following intensity information associated with your electricity generation activities.

Row 1

(9.7.1.1) Water intensity value (m3/denominator)

0.69

(9.7.1.2) Numerator: water aspect

Select from:

☑ Total water consumption

(9.7.1.3) Denominator

Select from:

☑ Other, please specify :Gross electricity generation (MWh)

(9.7.1.4) Comparison with previous reporting year

Select from:

☑ Much higher

(9.7.1.5) Five-year forecast

Select from:

☑ Lower

(9.7.1.6) Use of the metric within the organization

Select all that apply

☑ Incorporate into risk management procedures

☑ Inform strategies for managing and mitigating water stress

☑ Monitor progress against targets

☑ Reduce impact on water resources

☑ Reference for future water targets and business planning

(9.7.1.7) Please explain

In 2025, total water consumption across Akenerji's nine power generation facilities was 2,582,384 m³ and gross electricity generation was 3,772,752.699 MWh, resulting in a water-consumption intensity of 0.69 m³/MWh. The numerator represents total water consumed within the reporting boundary, calculated as total withdrawals less total discharges. The denominator represents gross electricity generated by Akenerji's one natural gas combined-cycle power plant, seven hydroelectric power plants and one wind power plant. The equivalent 2024 intensity, recalculated using 1,991,210 m³ of consumption and 3,968,772.585 MWh of gross generation, was 0.50175 m³/MWh. The 2025 intensity was therefore approximately 36.4% higher, mainly because water consumption increased while gross electricity generation decreased. The increase was primarily associated with the water balance at Erzin NGCCPP, which accounts for the majority of company-wide water consumption. Akenerji uses the metric to monitor operational water performance, support water-related risk assessment and inform efficiency objectives. The five-year forecast is lower, reflecting continued monitoring and operational-efficiency measures aimed at reducing water consumption per unit of electricity generated.

Row 2

(9.7.1.1) Water intensity value (m3/denominator)

4.01

(9.7.1.2) Numerator: water aspect

Select from:

☑ Total water withdrawals

(9.7.1.3) Denominator

Select from:

☑ Other, please specify :Gross electricity generation (MWh)

(9.7.1.4) Comparison with previous reporting year

Select from:

☑ Much higher

(9.7.1.5) Five-year forecast

Select from:

☑ Lower

(9.7.1.6) Use of the metric within the organization

Select all that apply

☑ Incorporate into risk management procedures

☑ Inform strategies for managing and mitigating water stress

☑ Monitor progress against targets

☑ Reduce impact on water resources

☑ Reference for future water targets and business planning

(9.7.1.7) Please explain

In 2025, total water withdrawals across Akenerji's nine power generation facilities amounted to 15,101,119 m³ and gross electricity generation was 3,772,752.699 MWh, resulting in a withdrawal intensity of 4.01 m³/MWh. The numerator includes seawater, renewable groundwater and third-party water withdrawn within the reporting boundary. The majority of the volume consists of seawater withdrawn at Erzin NGCCPP for cooling purposes. The equivalent 2024 intensity, calculated using total withdrawals of 13,211,890 m³ and gross generation of 3,968,772.585 MWh, was 3.32912 m³/MWh. Withdrawal intensity therefore increased by approximately 20.2%, reflecting increased seawater withdrawal combined with lower gross electricity generation. Akenerji uses the metric to monitor dependence on water sources, assess operational water risks and track water efficiency per unit of generation. The five-year forecast is lower due to continued operational optimization and water-efficiency monitoring.

Row 3

(9.7.1.1) Water intensity value (m3/denominator)

3.32

(9.7.1.2) Numerator: water aspect

Select from:

☑ Other, please specify :Total water discharge

(9.7.1.3) Denominator

Select from:

☑ Other, please specify :Gross electricity generation (MWh)

(9.7.1.4) Comparison with previous reporting year

Select from:

☑ Higher

(9.7.1.5) Five-year forecast

Select from:

☑ Lower

(9.7.1.6) Use of the metric within the organization

Select all that apply

☑ Incorporate into risk management procedures

☑ Monitor progress against targets

☑ Reduce impact on water resources

☑ Reference for future water targets and business planning

(9.7.1.7) Please explain

In 2025, total water discharge across Akenerji's nine power generation facilities amounted to 12,518,735 m³ and gross electricity generation was 3,772,752.699 MWh, resulting in a discharge intensity of 3.32 m³/MWh. The numerator primarily comprises cooling-water and treated wastewater discharge from Erzin NGCCPP to the Mediterranean Sea, together with limited domestic wastewater transferred from the hydroelectric and wind facilities to third-party treatment destinations. The equivalent 2024 intensity, calculated using total discharges of 11,220,680 m³ and gross generation of 3,968,772.585 MWh, was 2.82774 m³/MWh. Discharge intensity therefore increased by approximately 17.4%, reflecting higher discharge volumes alongside lower gross electricity generation. The metric is used to monitor discharge performance, regulatory compliance and operational water efficiency. The five-year forecast is lower, supported by continued optimization of water use and discharge performance per unit of electricity generated.

[Add row]

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

	Products contain hazardous substances	Comment
	Select from: ☑ No	*Akenerji generates electricity, which is inherently free of hazardous substances.*

[Fixed row]

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

(9.14.1) Products and/or services classified as low water impact

Select from:

☑ Yes

(9.14.2) Value chain stage where low water impact is assessed

Select all that apply

☑ Direct operations

(9.14.3) Indicator used to assess water impact

Water quantity

☑ Lower water withdrawal/consumption than conventional processes

(9.14.4) Have you used a certification standard to classify your products/services as low water impact?

Select from:

☑ No

(9.14.5) Definition used to classify low water impact

Akenerji operates one wind power plant, seven hydroelectric power plants and one natural gas combined cycle gas turbine power plant. Electricity generated by our seven HEPPs and Ayyıldız WPP is classified as having a low water impact at the direct operations stage based on the operational water withdrawal and consumption associated with electricity generation. At our HEPPs, water passes through turbines to convert its potential energy into mechanical and electrical energy and is subsequently returned to the water system. The generation process does not involve the addition of chemicals or industrial additives to the water. As water is not consumed as a primary input in the electricity conversion process, electricity generated by our HEPPs is assessed as having lower operational water consumption than conventional thermal power generation processes that require water for cooling and other operational purposes. Ayyıldız WPP represents a more distinct example of low water impact electricity generation, as the generation process relies on wind energy and requires no water withdrawal, consumption or discharge for electricity production or cooling. Accordingly, electricity generated by Ayyıldız WPP exerts no pressure on local water resources during direct operations.

(9.14.7) Please explain

Akenerji classifies the electricity generated by its seven hydroelectric power plants and Ayyıldız WPP as having a low water impact at the direct operations stage. At the HEPPs, water passes through turbines to generate electricity, while the generation process does not require water for cooling or involve the addition of chemicals or industrial additives. Ayyıldız WPP generates electricity from wind energy without requiring water withdrawal, consumption or discharge as part of the electricity generation process. The classification is based on the lower operational water withdrawal and consumption associated with these technologies compared with conventional thermal power generation processes that require water for cooling and other operational purposes. In 2025, Akenerji's seven HEPPs and Ayyıldız WPP represented 26% of its total installed capacity and accounted for 26% of its electricity generation mix.
[Fixed row]

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

Water pollution

(9.15.1) Target set in this category

Select from:

☑ No, but we plan to within the next two years

(9.15.3) Primary reason for not setting a target in this category

Select from:

☑ Not an immediate strategic priority

(9.15.4) Explain why you do not have a target set in this category

Akenerji manages water pollution risks through facility-level monitoring of discharge volumes and compliance with applicable water quality permits, standards and environmental regulations. No incidents of non-compliance related to water quality were recorded in 2025. As these controls currently support the management of discharge-related impacts, a separate quantitative water pollution target has not yet been established. Akenerji intends to further develop its target-setting approach to support continued improvement in water quality management, considering relevant TCFD, TNFD and SDG frameworks, and to communicate future targets publicly once defined.

Water withdrawals

(9.15.1) Target set in this category

Select from:

☑ Yes

(9.15.2) Science-based target set in this target category according to SBTN guidance

Select from:

☑ No, but we plan to within the next two years

Water, Sanitation, and Hygiene (WASH) services

(9.15.1) Target set in this category

Select from:

☑ No, but we plan to within the next two years

(9.15.3) Primary reason for not setting a target in this category

Select from:

☑ Not an immediate strategic priority

(9.15.4) Explain why you do not have a target set in this category

Akenerji provides workers with access to safely managed water, sanitation and hygiene services across its facilities. The availability and functioning of these services are maintained through established occupational health, safety and facility management practices. As the current approach focuses on maintaining adequate WASH conditions and addressing operational needs, a separate time-bound quantitative target has not been established. Akenerji will continue to monitor WASH services and review the need for additional targets in support of SDG 3, Good Health and Well-being, and SDG 6, Clean Water and Sanitation.

Other

(9.15.1) Target set in this category

Select from:

☑ No, but we plan to within the next two years

[Fixed row]

(9.15.1) Provide details of your water-related targets and the progress made.

Row 1

(9.15.1.1) Target reference number

Select from:

☑ Water target 1

(9.15.1.2) Target coverage

Select from:

☑ Organization-wide (direct operations only)

(9.15.1.3) Category of target & Quantitative metric

Water withdrawals

☑ Other water withdrawals, please specify :Reduction in total water consumption

(9.15.1.4) Date target was set

12/30/2023

(9.15.1.5) End date of base year

12/30/2021

(9.15.1.6) Base year figure

2725.73

(9.15.1.7) End date of target year

12/31/2026

(9.15.1.8) Target year figure

2453.16

(9.15.1.9) Reporting year figure

2582.39

(9.15.1.10) Target status in reporting year

Select from:

☑ Underway

(9.15.1.11) % of target achieved relative to base year

53

(9.15.1.12) Global environmental treaties/initiatives/frameworks aligned with or supported by this target

Global environmental treaties/initiatives/frameworks aligned with or supported by this target

☑ Sustainable Development Goal 6

(9.15.1.13) Explain target coverage and identify any exclusions

The target covers all nine power generation facilities in Akenerji's direct operations, comprising seven HEPPs, one WPP and one NGCCGT. It applies to total water consumption across the full operational portfolio and includes facilities located in priority areas with substantive water-related dependencies and risks. This includes HEPPs exposed to high or extremely high water stress and drought-related water availability risks. The target does not cover upstream or downstream value chain activities because it was established for water consumption under Akenerji's operational control. No facility within direct operations is excluded from the target.

(9.15.1.14) Plan for achieving target, and progress made to the end of the reporting year

Akenerji plans to progress toward the target through cooling-water optimization, operational efficiency improvements, facility-level monitoring and measures to reduce water-use intensity. Annual water consumption is reviewed against the 2021 baseline of 2,725.73 ML and the target level of 2,453.16 ML. In 2025, consumption was 2,582.384 ML, approximately 5.3% below the baseline. Progress is variable because water demand changes with operational activity, maintenance schedules, cooling requirements, ambient conditions and production levels. Akenerji will continue monitoring and efficiency measures and expects consumption to decrease in the following reporting year. Additional actions will be evaluated based on annual performance.

(9.15.1.18) Further details of target

The base year, reporting year and target year figures are stated in megaliters. The target was set using Akenerji's total water consumption of 2,725.73 ML in 2021 as the baseline and applying a 10% reduction to establish a target level of 2,453.16 ML. The methodology is based on facility-level water consumption data that is regularly monitored, recorded and aggregated across Akenerji's operational portfolio. Water-use performance is managed through field inspections to prevent water losses and leaks, monitoring of optimum operating conditions in water treatment, cooling and auxiliary systems, and employee awareness activities on efficient water use. The target supports the management of water-related dependencies, impacts and risks by improving operational control and resource efficiency across the facilities.
[Add row]

C11. Environmental performance - Biodiversity

(11.2) What actions has your organization taken in the reporting year to progress your biodiversity-related commitments?

	Actions taken in the reporting period to progress your biodiversity-related commitments
	Select from: ☑ No, we are not taking any actions to progress our biodiversity-related commitments, but we plan to within the next two years

[Fixed row]

(11.3) Does your organization use biodiversity indicators to monitor performance across its activities?

	Does your organization use indicators to monitor biodiversity performance?	Indicators used to monitor biodiversity performance
	Select from: ☑ Yes, we use indicators	*Select all that apply* ☑ Other, please specify :Site-level ecological impact indicators monitored through EIA and environmental management processes

[Fixed row]

(11.4) Does your organization have activities located in or near to areas important for biodiversity in the reporting year?

Legally protected areas

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☑ No

(11.4.2) Comment

Akenerji operates outside areas identified as legally protected areas and assesses potential biodiversity sensitivities through Environmental Impact Assessment (EIA) processes and site-level environmental monitoring. Across its facilities, environmental impact monitoring is initiated at the investment stage in line with EIA processes and continues during operations in accordance with applicable legislation. These activities monitor potential impacts on natural life, sensitive species, habitats and ecosystem continuity. Biodiversity and ecological impacts are also addressed within Akenerji's environmental management approach, with relevant risks and opportunities reviewed and necessary actions planned where required. No environmental incident, non-compliance or permanent impact on ecosystems was identified within the scope of biodiversity conservation and ecological impact management.

UNESCO World Heritage sites

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☑ No

(11.4.2) Comment

Akenerji does not operate within or in close proximity to UNESCO World Heritage Sites. Potential biodiversity-related sensitivities are assessed through Environmental Impact Assessment (EIA) and, where applicable, Environmental and Social Impact Assessment (ESIA) processes, as well as site-level environmental monitoring activities carried out from investment planning through operations in line with applicable legislation. These processes monitor potential impacts on natural life, sensitive species, habitats and ecosystem continuity. Biodiversity and ecological impacts are managed within Akenerji's environmental management approach, with related risks and opportunities reviewed regularly and necessary actions planned where required. This monitoring-based approach supports environmentally responsible operations and helps ensure that Akenerji's activities do not adversely affect the outstanding universal value of UNESCO World Heritage Sites.

UNESCO Man and the Biosphere Reserves

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☑ No

(11.4.2) Comment

Akenerji's operations are not located within, adjacent to, or in close proximity to UNESCO Man and the Biosphere Reserves. Potential biodiversity-related sensitivities are assessed through Environmental Impact Assessment (EIA) and, where applicable, Environmental and Social Impact Assessment (ESIA) processes, supported by site-level environmental monitoring activities carried out during operations in line with applicable legislation. These processes monitor potential impacts on natural life, sensitive species, habitats and ecosystem continuity. Biodiversity and ecological impacts are managed within Akenerji's environmental management approach, with related risks and opportunities reviewed and necessary actions planned where required. This approach supports environmentally responsible operations and helps ensure that Akenerji's activities do not adversely affect the ecological functions of UNESCO Man and the Biosphere Reserves.

Ramsar sites

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☑ No

(11.4.2) Comment

Ramsar Sites are wetlands of international importance, designated to conserve biodiversity and maintain ecological functions. Akenerji's facilities are not located within or near any designated Ramsar Site. Potential biodiversity-related sensitivities are assessed through Environmental Impact Assessment (EIA) and, where applicable, Environmental and Social Impact Assessment (ESIA) processes, and are followed through environmental monitoring activities carried out during operations in line with applicable legislation. Akenerji's environmental management approach considers potential impacts on natural life, sensitive species, habitats and ecosystem continuity. For hydroelectric power plants, monitoring practices include tracking fish passage functionality and legally required ecological flow releases, supporting the protection of aquatic ecosystems. These practices help ensure that Akenerji's operations remain environmentally responsible and do not adversely affect the ecological integrity or conservation objectives of Ramsar Sites.

Key Biodiversity Areas

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☑ No

(11.4.2) Comment

Akenerji carries out its activities in an environmentally sensitive manner and does not operate within or near Key Biodiversity Areas. Potential biodiversity-related sensitivities are assessed through Environmental Impact Assessment (EIA) and, where applicable, Environmental and Social Impact Assessment (ESIA) processes, and are monitored during operations in line with applicable legislation. Akenerji's environmental management approach considers potential impacts on natural life, sensitive species, habitats and ecosystem continuity. The Company complies with biodiversity-related legal requirements and implements necessary measures to protect species and ecosystems. Through these processes, Akenerji aims to ensure that its operations remain environmentally responsible and do not adversely affect the ecological value of Key Biodiversity Areas.

Other areas important for biodiversity

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☑ No

(11.4.2) Comment

Akenerji's operations are not located within or in close proximity to protected, sensitive, or otherwise important areas for biodiversity, as assessed through its environmental impact assessment and monitoring processes.
[Fixed row]

C13. Further information & sign off

(13.1) Indicate if any environmental information included in your CDP response (not already reported in 7.9.1/2/3, 8.9.1/2/3/4, and 9.3.2) is verified and/or assured by a third party?

	Other environmental information included in your CDP response is verified and/or assured by a third party
	Select from: ☑ Yes

[Fixed row]

(13.1.1) Which data points within your CDP response are verified and/or assured by a third party, and which standards were used?

Row 1

(13.1.1.1) Environmental issue for which data has been verified and/or assured

Select all that apply

☑ Climate change

(13.1.1.2) Disclosure module and data verified and/or assured

All data points in CDP response

☑ All data points in CDP response

(13.1.1.3) Verification/assurance standard

General standards

☑ ISAE 3000

☑ ISAE 3410

☑ ISO 14064-1

☑ ISO 14064-3

(13.1.1.4) Further details of the third-party verification/assurance process

All data points identified as assured or verified are supported by independent third-party processes appropriate to their subject matter. Financial figures used in the CDP response and presented in Akenerji's 2025 Integrated Annual Report are derived from the audited 2025 consolidated financial statements. The audit was conducted under the applicable Standards on Independent Auditing and provided reasonable assurance that the financial statements present fairly, in all material respects, the Group's financial position, financial performance and cash flows in accordance with Turkish Financial Reporting Standards. Sustainability and climate-related information prepared under TSRS 1 and TSRS 2 was subject to independent limited assurance in accordance with ISAE 3000. Greenhouse gas information included in the sustainability disclosures was additionally covered under ISAE 3410. The 2025 greenhouse gas inventories of Akenerji and relevant subsidiaries were independently verified under ISO 14064-1:2018 and ISO 14064-3:2019. The processes assessed reporting boundaries, emission sources, methodologies, supporting records, data systems, controls, estimation methods, completeness and material accuracy. Together, these processes support the financial, climate-related and emissions data presented in the 2025 Integrated Annual Report and used in the CDP response, within the respective boundaries of each assurance or verification statement.

(13.1.1.5) Attach verification/assurance evidence/report (optional)

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Row 2

(13.1.1.1) Environmental issue for which data has been verified and/or assured

Select all that apply

☑ Water

(13.1.1.2) Disclosure module and data verified and/or assured

All data points in CDP response

☑ All data points in CDP response

(13.1.1.3) Verification/assurance standard

Water-related standards

☑ Other water verification standard, please specify :ISO 14046:2014

(13.1.1.4) Further details of the third-party verification/assurance process

Water-related data identified as assured or verified are supported by complementary independent third-party processes. Water-related risks, opportunities, governance, strategy and associated financial effects disclosed under TSRS 1 and TSRS 2 were subject to limited assurance in accordance with ISAE 3000. The assurance procedures included review of reporting processes, internal documentation, information systems, estimation methods and assumptions, and the processes used to identify and assess financially material sustainability-related risks and opportunities. Financial inputs used to quantify water-related risks and opportunities, including consolidated financial metrics presented in Akenerji's 2025 Integrated Annual Report, are derived from the independently audited 2025 consolidated financial statements. The financial audit was conducted under the applicable Standards on Independent Auditing and provided reasonable assurance over the consolidated financial statements in accordance with Turkish Financial Reporting Standards. In addition, the 2025 water-footprint inventories of Akenerji and its subsidiaries were independently verified against ISO 14046:2014. The verification assessed the defined organizational and operational boundaries, inventory methodology, supporting records, calculations and applicable water-accounting data. Together, these processes support the water-related risks, opportunities, financial inputs, water-accounting metrics and water-quality data used in the CDP response, within the respective scope and boundaries of each assurance or verification statement.

(13.1.1.5) Attach verification/assurance evidence/report (optional)

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[Add row]

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

(13.2.1) Additional information

Akenerji promotes transparency in its sustainability practices by making key environmental, climate-related and water-related information publicly available on its corporate website. Stakeholders can access the Company's integrated annual reports, sustainability reports, CDP disclosures, verified emission reduction certificates, and carbon and water footprint verification certificates. The website also provides information on Akenerji's sustainability approach, commitments, certifications, awards, news and other relevant developments. Further information is available on the https://www.akenerji.com.tr/en/sustainability.

[Fixed row]

(13.3) Provide the following information for the person that has signed off (approved) your CDP response.

(13.3.1) Job title

General Manager (CEO) of Akenerji

(13.3.2) Corresponding job category

Select from:
☑ Chief Executive Officer (CEO)
[Fixed row]

(13.4) Please indicate your consent for CDP to share contact details with the Pacific Institute to support content for its Water Action Hub to facilitate collective action in priority basins.

Select from:
☑ Yes, CDP may share our Disclosure Submission Lead contact details with the Pacific Institute