DURAN DOĞAN BASIM VE AMBALAJ A.Ş.

2025 CDP Corporate Questionnaire 2025

Word version

Important: this export excludes unanswered questions
This document is an export of your organization's CDP questionnaire response. It contains all data points for questions that are answered or in progress. There may be questions or data points that you have been requested to provide, which are missing from this document because they are currently unanswered. Please note that it is your responsibility to verify that your questionnaire response is complete prior to submission. CDP will not be liable for any failure to do so.
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09/16/2025, 01:19 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:

☑ TRY

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

(1.3.2) Organization type

Select from:

☑ Privately owned organization

(1.3.3) Description of organization

Duran Doğan Packaging Industry and Trade Inc. is one of the most established and innovative players in the packaging sector. The company was founded in 2005 through the merger of two of the industry's most experienced companies: Duran Offset, established in 1953 by Ali Duran, and Doğan Packaging. Since 1991, the company has been listed on Borsa Istanbul, reflecting its strong corporate governance and transparency. In 2013, Duran Doğan entered into a strategic partnership with LGR Emballages, combining decades of expertise to become a leading packaging converter in Europe and beyond. Today, the company employs over 350 professionals who deliver high-quality packaging solutions to a global customer portfolio. Clients include internationally recognized brands in premium food, confectionery, alcoholic beverages, personal care, cosmetics, pharmaceuticals, and other consumer goods sectors—industries where packaging quality, sustainability, and compliance with environmental standards are critical. Operations and Market Presence Duran Doğan operates three production facilities in Istanbul: Hadımköy (18,000 m² closed area), Ömerli (6,000 m² closed area) and Atlas Ofset (6,071 m² closed area). Another site (Ömerli 2) is dedicated to warehousing and PET film recycling. Production processes include design, fluting, film lamination, die-cutting, printing, gluing, foiling, and special finishing. Inline corrugated cardboard (E+F+G+B wave types) is produced at the Ömerli site. Approximately 50–55% of sales are generated from exports. Key markets include the United Kingdom, Ireland, Belgium, France, the United States, and Russia, with European customers supported by strategically located warehouses in the UK, France, and Poland. Environmental Relevance: Climate and Water Packaging production is closely linked to climate change and natural resource use. The company recognizes that while its internal operations generate emissions, the majority of its greenhouse gas (GHG) footprint arises from purchased goods (mainly paper and

board), as well as upstream and downstream transportation and distribution activities. These value chain emissions represent a central focus of its climate strategy. Water is also a critical resource for packaging operations, particularly in raw material supply and in production processes such as printing and cleaning. The company closely monitors water use at its facilities and invests in efficiency measures and wastewater management to reduce freshwater demand. Water risks, including scarcity and supply variability in Turkey, are considered in operational planning and supplier engagement. Sustainability and Circular Economy Carbon management and responsible use of natural resources are integral to Duran Doğan's corporate culture. The company has implemented a series of initiatives to reduce its environmental footprint, including: • Improving thermal efficiency through insulation to reduce heating and cooling needs. • Installing a rooftop solar system to supply electricity for office operations. • Reducing natural gas consumption with a heat exchanger system in the air compressor. • Transitioning pallet trucks and forklifts to electric models. • Implementing closed-loop collection of cardboard waste within production. • Recycling PET film waste from the transfer metallization process into high-quality PET granules, which are then used as raw materials in the plastics industry. These efforts both reduce emissions and contribute to the circular economy by minimizing waste and promoting the reuse of materials. Standards and Memberships Duran Doğan is a member of the European Carton Makers Association (ECMA) and the International Packaging Group Climate Commitment (IPGCC). The company holds internationally recognized certifications including ISO 9001, ISO 14001, HACCP, BRCGS PM, PEFC, FSC, ISO 45001, SEDEX, and GMP. These certifications confirm its commitment to quality, environmental management, occupational health and safety, and the hygienic production of direct food contact and pharmaceutical packaging. Strategic Outlook Looking ahead, Duran Doğan aims to further align its business with global climate and sustainability goals. The company invests in innovative, recyclable, and environmentally responsible packaging technologies that minimize non-recyclable material use and reduce environmental impacts throughout the value chain. As climate change, water scarcity, and circular economy requirements become increasingly central to global markets and customer expectations, Duran Doğan is positioning itself as a responsible partner and leader in sustainable packaging.
[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.

	End date of reporting year	Alignment of this reporting period with your financial reporting period	Indicate if you are providing emissions data for past reporting years
	12/30/2024	*Select from:* ☑ Yes	*Select from:* ☑ No

[Fixed row]

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

2003012837

(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:
☑ Yes

(1.6.2) Provide your unique identifier

TRADUROF91D4

ISIN code - equity

(1.6.1) Does your organization use this unique identifier?

Select from:
☑ No

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

DURDO

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:

☑ No

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
☑ Turkey

(1.11) Are greenhouse gas emissions and/or water-related impacts from the production, processing/manufacturing, distribution activities or the consumption of your products relevant to your current CDP disclosure?

Production

(1.11.1) Relevance of emissions and/or water-related impacts

Select from:
☑ Value chain (including own land)

Processing/ Manufacturing

(1.11.1) Relevance of emissions and/or water-related impacts

Select from:
☑ Direct operations

Distribution

(1.11.1) Relevance of emissions and/or water-related impacts

Select from:
☑ Direct operations

Consumption

(1.11.1) Relevance of emissions and/or water-related impacts

Select from:
☑ Yes
[Fixed row]

(1.23) Which of the following agricultural commodities that your organization produces and/or sources are the most significant to your business by revenue?

Cattle products

(1.23.1) Produced and/or sourced

Select from:
☑ No

Cocoa

(1.23.1) Produced and/or sourced

Select from:
☑ No

Coffee

(1.23.1) Produced and/or sourced

Select from:

☑ No

Cotton

(1.23.1) Produced and/or sourced

Select from:

☑ No

Dairy & egg products

(1.23.1) Produced and/or sourced

Select from:

☑ No

Fish and seafood from aquaculture

(1.23.1) Produced and/or sourced

Select from:

☑ No

Fruit

(1.23.1) Produced and/or sourced

Select from:

☑ No

Maize/corn

(1.23.1) Produced and/or sourced

Select from:

☑ No

Nuts

(1.23.1) Produced and/or sourced

Select from:

☑ No

Other grain (e.g., barley, oats)

(1.23.1) Produced and/or sourced

Select from:

☑ No

Other oilseeds (e.g. rapeseed oil)

(1.23.1) Produced and/or sourced

Select from:

☑ No

Palm oil

(1.23.1) Produced and/or sourced

Select from:

☑ No

Poultry & hog

(1.23.1) Produced and/or sourced

Select from:

☑ No

Rice

(1.23.1) Produced and/or sourced

Select from:

☑ No

Soy

(1.23.1) Produced and/or sourced

Select from:

☑ No

Sugar

(1.23.1) Produced and/or sourced

Select from:

☑ No

Tea

(1.23.1) Produced and/or sourced

Select from:

☑ No

Timber products

(1.23.1) Produced and/or sourced

Select from:

☑ No

Tobacco

(1.23.1) Produced and/or sourced

Select from:

☑ No

Vegetable

(1.23.1) Produced and/or sourced

Select from:

☑ No

Wheat

(1.23.1) Produced and/or sourced

Select from:

☑ No

Other commodity

(1.23.1) Produced and/or sourced

Select from:

☑ No

[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 2 suppliers

(1.24.7) Description of mapping process and coverage

Duran Doğan Packaging has mapped its value chain to increase visibility of environmental impacts and dependencies, focusing on areas most relevant to climate change and resource use. The process was guided by senior management priorities, stakeholder input, and aligned with the GHG Protocol and EFRAG IG2 Value Chain Implementation Guidance. Mapping began with upstream activities, as raw materials such as paperboard, PET films, inks, adhesives, and aluminum foils represent the largest share of our footprint. For Tier 1 suppliers, direct data was collected through digital systems and supplier surveys, covering GHG emissions, certifications, and environmental practices. For Tier 2 suppliers, where information is more limited, estimates were made using recognized emission factors, product weights, and process data from sectoral databases. On the downstream side, the mapping covered customers, distributors, logistics, and end-of-life processes such as recycling and waste management. A particular focus was placed on circularity: PET film waste from production is recycled internally into high-quality PET granules, contributing to resource efficiency. Export-related distribution was also assessed, recognizing transportation as a significant contributor to Scope 3 emissions. The current mapping covers Tier 1 and Tier 2 suppliers, downstream logistics, and recycling processes. While it is not yet complete, we plan to expand coverage to lower-tier suppliers and improve data quality through closer collaboration. Key findings show that purchased goods and services, and upstream and downstream transportation, are the largest sources of Scope 3 emissions. Water use in raw material production was also identified as a dependency, highlighting the need for

supplier engagement in water stewardship. Overall, this process has strengthened our ability to manage climate and water-related risks, enhance traceability, and prioritize actions such as low-carbon sourcing, efficiency projects, and circular packaging solutions.
[Fixed row]

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

(1.24.1.1) Plastics mapping

Select from:

☑ No, and we do not plan to within the next two years

(1.24.1.5) Primary reason for not mapping plastics in your value chain

Select from:

☑ Judged to be unimportant or not relevant

(1.24.1.6) Explain why your organization has not mapped plastics in your value chain

Plastic inputs represent only 0.6% of our total raw materials, as 100% of our revenue is derived from paper-based packaging. Therefore, plastics are not considered a substantive risk factor for our business model. Nevertheless, we continue to invest in R&D to develop bio-degradable films, further reducing environmental impact and aligning with circular economy principles.
[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)

1

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

Duran Doğan defines short, medium, and long-term horizons as part of its strategic risk assessment process, which is directly linked to our ISO 14001 Environmental Management System. These time frames are consistent with international disclosure standards, including TSRS/IFRS S2 and the TCFD framework, and guide our evaluation of climate- and water-related risks and opportunities. This horizon focuses on operational-level risks and opportunities. In the short term, we prioritize process and product-level efficiency improvements that reduce GHG emissions, energy use, and water consumption. For example, Kaizen, 5S, and lean production practices are applied to monitor and lower energy and water demand in our facilities. Supplier engagement is also strengthened through certification tracking (FSC, PEFC) and environmental compliance checks. This enables rapid response to acute risks such as extreme weather events disrupting raw material transport or sudden water restrictions affecting recycled carton supply.

Medium-term

(2.1.1) From (years)

1

(2.1.3) To (years)

10

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

The medium-term horizon covers the period up to 2030, aligning with the UN Sustainable Development Goals (SDGs) and the EU 2030 climate and water targets. In this period, we assess both transition and physical risks: • Transition risks include rising regulatory pressure, the EU CBAM regulation, stricter deforestation laws, and customer demand for certified, low-carbon packaging. These could increase raw material and compliance costs if not addressed. • Physical risks include forest degradation from fires, storms, and invasive species, which may reduce pulp and carton supply, leading to cost increases and supply chain instability. • Water-related risks include the heavy water demand in recycled carton production. Stricter water regulations or regional water scarcity in Turkey could raise supplier costs and affect availability. To mitigate these risks, we have increased the share of sustainably certified raw materials, accelerated R&D on alternative packaging inputs, prioritized local suppliers to reduce water and transport footprints, and updated procurement criteria to include supplier sustainability performance. This horizon is also integrated into our business continuity planning, ensuring operational resilience.

Long-term

(2.1.1) From (years)

10

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

Select from:

☑ No

(2.1.3) To (years)

30

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

The long-term horizon extends to 2050, in line with global net-zero and climate resilience targets. In this period, we expect climate-related risks (chronic water scarcity, long-term forest degradation, increasing regulatory stringency, and shifts in global trade patterns) to become more pronounced. These risks could materially impact our revenue, competitiveness, and access to key resources. Scenario analyses based on IPCC pathways and EU policy frameworks are used to test resilience. Mitigation strategies include long-term commitments to 100% sustainably sourced raw materials, further circular economy integration (internal PET recycling, design-for-recycling packaging), and ongoing water stewardship programs with suppliers. Our membership in ECMA and IPGCC also supports sector-wide efforts to align with climate goals and share best practices.
[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

☑ Water

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

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☑ Direct operations

☑ Upstream value chain

☑ Downstream value chain

☑ End of life management

(2.2.2.4) Coverage

Select from:

☑ Full

(2.2.2.5) Supplier tiers covered

Select all that apply

☑ Tier 1 suppliers

☑ Tier 2 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

(2.2.2.12) Tools and methods used

Commercially/publicly available tools

☑ EcoVadis

☑ SEDEX

☑ WRI Aqueduct

Enterprise Risk Management
☑ COSO Enterprise Risk Management Framework
☑ ISO 31000 Risk Management Standard

International methodologies and standards
☑ IPCC Climate Change Projections
☑ ISO 14001 Environmental Management Standard
☑ ISO 14046 Environmental Management – Water Footprint

Other
☑ Desk-based research
☑ External consultants
☑ Partner and stakeholder consultation/analysis
☑ Scenario analysis

(2.2.2.13) Risk types and criteria considered

Acute physical
☑ Drought
☑ Heat waves
☑ Heavy precipitation (rain, hail, snow/ice)
☑ Wildfires

Chronic physical
☑ Heat stress
☑ Water stress
☑ Change in land-use
☑ Rationing of municipal water supply
☑ Increased severity of extreme weather events
☑ Water availability at a basin/catchment level
☑ Changing precipitation patterns and types (rain, hail, snow/ice)

Policy
☑ Carbon pricing mechanisms

☑ Changes to national legislation
☑ Increased pricing of water

Market
☑ Availability and/or increased cost of certified sustainable material
☑ Availability and/or increased cost of raw materials
☑ Changing customer behavior
☑ Inadequate access to water, sanitation, and hygiene services (WASH)

Reputation
☑ Increased partner and stakeholder concern and partner and stakeholder negative feedback

Technology
☑ Transition to lower emissions technology and products
☑ Transition to water efficient and low water intensity technologies and products

Liability
☑ Non-compliance with regulations

(2.2.2.14) Partners and stakeholders considered

Select all that apply
☑ Customers
☑ Employees
☑ NGOs
☑ Regulators
☑ Suppliers

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

Select from:
☑ No

(2.2.2.16) Further details of process

Duran Doğan has established a structured process to identify, assess, and manage environmental dependencies, impacts, risks, and opportunities across its value chain. The process covers climate change and water as priority topics, and includes upstream suppliers (Tier 1 and Tier 2), our own operations, downstream distribution, and end-of-life stages of packaging. Assessments are carried out annually across short (0–1 year), medium (1–10 years), and long (10–30 years) horizons, consistent with TCFD/IFRS S2 recommendations. The methodology combines qualitative and quantitative analysis, drawing on recognized references such as the GHG Protocol, IPCC reports, WRI tools, ISO 14001 Environmental Management, ISO 14046 Water Footprint, and ISO 31000 risk management. Risks and opportunities are categorized as physical (acute and chronic climate impacts), transition (regulatory, market, and technology shifts), and resource-related (water dependency). For example, physical risks include reduced carton supply due to forest degradation or water scarcity in recycling; transition risks include stricter EU deforestation laws, CBAM, and customer demand for certified low-carbon packaging; opportunities include expansion of circular packaging, renewable energy, and water efficiency solutions. The process is embedded in our integrated corporate risk management system. All risks are scored for likelihood and impact on a 1–5 scale, producing risk ratings (low to high). A financial materiality threshold of 0,5 % of revenues (~10 million TL) is applied to ensure focus on issues with strategic significance. The Sustainability Committee, chaired by senior executives, is responsible for climate and environmental risk assessments, ensuring alignment with corporate strategy. The Committee reviews results, sets action plans (e.g., supplier certification, R&D into alternative materials, energy and water efficiency projects), and integrates them into investment and procurement decisions. The CEO provides biannual briefings to the Board, ensuring oversight. Stakeholder engagement is embedded in the process. Supplier surveys, certification monitoring (FSC, PEFC), and customer requirements are incorporated. Cross-functional workshops with R&D, operations, finance, and procurement teams ensure that trade-offs (e.g., between water use and biodiversity impacts) are evaluated. This comprehensive approach ensures that environmental dependencies, risks, and opportunities are systematically integrated into Duran Doğan's corporate strategy, financial planning, and operational management, positioning the company to mitigate risks and capitalize on sustainable growth opportunities.
[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

Yes, Duran Doğa systematically assesses the interconnections between environmental dependencies, impacts, risks, and opportunities as part of its integrated sustainability risk management process. This ensures that climate, water and biodiversity issues are evaluated in a holistic way, across our value chain. The assessment is embedded into our annual risk and opportunity reviews and carried out through cross-functional workshops with environmental, operational, financial, procurement, and R&D teams. These workshops allow us to identify synergies and trade-offs across topics. Results are reviewed by the Sustainability Committee and integrated into strategic planning, investment decisions, and supplier engagement. For example, when analyzing the impacts of climate change on water resources, we also evaluate potential effects on biodiversity and raw material supply. Water efficiency projects are assessed for both operational savings and ecosystem benefits, while trade-offs such as water intensity in recycled carton production are managed through supplier collaboration and technology improvements. Similarly,

increasing the share of certified carton reduces deforestation risks while contributing to biodiversity protection. An important opportunity identified through this integrated approach is our R&D investment in PET film recycling. By recovering PET films from transfer metallization and processing them into high-quality granules, we reduce raw material dependency, lower GHG emissions and waste, and contribute to the circular economy. At the same time, this creates new revenue streams and competitive advantage as customer demand for recyclable packaging grows. This demonstrates how environmental dependency, risk (resource cost, waste), and opportunity (new product and revenue line) are directly connected. We acknowledge challenges in quantifying trade-offs, especially when data quality varies across suppliers and regions. To address this, we are enhancing data integration, supplier reporting, and scenario analysis. By embedding interconnection analysis into our risk management system, Duran Doğan ensures that climate, water, biodiversity, and circular economy considerations are not assessed in isolation but as part of an integrated framework, strengthening both environmental and financial resilience.
[Fixed row]

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

(2.3.1) Identification of priority locations

Select from:

☑ Yes, we are currently in the process of identifying priority locations

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

Select all that apply

☑ Direct operations

☑ Upstream value chain

☑ Downstream value chain

(2.3.3) Types of priority locations identified

Sensitive locations

☑ Areas important for biodiversity

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

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

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

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

(2.3.4) Description of process to identify priority locations

The process to identify priority locations across our value chain is ongoing and builds on a comprehensive environmental risk assessment that considers climate, water, and biodiversity dependencies. As our main raw material is carton sourced from forest products, biodiversity and forest ecosystem integrity are central to this process. We begin by mapping our value chain, including upstream suppliers, our production sites, and downstream distribution, and overlay this with data from recognized environmental frameworks such as the IUCN Red List of Threatened Species, the World Database on Protected Areas (WDPA), and water stress indicators. This allows us to identify sourcing regions and operational areas where ecosystems are under pressure due to deforestation risks, endangered species, or water scarcity. Particular attention is given to raw material supply areas where forest productivity is vulnerable to climate impacts (fires, storms, pests) and to recycling processes that are dependent on water-intensive operations. Our Istanbul-based production facilities are also included in the assessment to ensure that local dependencies, such as water availability and waste management capacity, are considered. We complement geospatial analysis with stakeholder engagement, working with certification bodies (FSC, PEFC), NGOs, and local regulators to better understand ecological sensitivities and regulatory developments. This multi-layered approach enables us to align our actions with both local and global biodiversity and climate goals. While the process is not yet finalized, early findings confirm that forest sourcing regions and water-intensive recycled carton supply chains are high-priority locations due to their biodiversity and water risks. As the process advances, we aim to refine the mapping, expand supplier coverage beyond Tier 1 and Tier 2, and integrate the results into procurement, investment, and sustainability planning. This ongoing assessment ensures that Duran Doğan can identify and act on priority locations where our value chain dependencies on ecosystems are greatest, thereby mitigating risks and supporting long-term resilience.

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

Select from:

☑ No, we do not have a list/geospatial map of priority locations

[Fixed row]

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

Risks

(2.4.1) Type of definition

Select all that apply

☑ Qualitative

☑ Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:

☑ Revenue

(2.4.3) Change to indicator

Select from:

☑ % decrease

(2.4.4) % change to indicator

Select from:

☑ Less than 1%

(2.4.6) Metrics considered in definition

Select all that apply

☑ Time horizon over which the effect occurs

(2.4.7) Application of definition

We define a substantive financial impact as any climate- or water-related risk that results in a change in revenue greater than 0.5% of total sales in 2024 (≈₺10 million). This threshold is derived from our financial materiality assessment, where revenue is considered the most relevant indicator for our sector. Examples include climate-related risks such as forest degradation, extreme weather, and regulatory changes (e.g., CBAM, EU deforestation rules), as well as water-related risks such as scarcity or increased costs in recycled carton supply chains. Risks exceeding this threshold are classified as substantive and escalated to our Sustainability Committee and the Board of Directors for action.

Opportunities

(2.4.1) Type of definition

Select all that apply

☑ Qualitative

☑ Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:
☑ Revenue

(2.4.3) Change to indicator

Select from:
☑ % increase

(2.4.4) % change to indicator

Select from:
☑ Less than 1%

(2.4.6) Metrics considered in definition

Select all that apply
☑ Time horizon over which the effect occurs

(2.4.7) Application of definition

We define a substantive financial opportunity as any climate- or water-related factor that results in an increase in revenue greater than 0.5% of total sales in 2024 (≈₺10 million). This threshold is consistent with our financial materiality assessment, where revenue is considered the most relevant indicator for our sector. Examples include the growing market demand for recyclable packaging, increased sales of recycled PET granules produced through our R&D investments, and customer preference for certified low-carbon carton. Opportunities above this threshold are treated as substantive and are integrated into our business strategy and investment planning by the Sustainability Committee and the Board of Directors.
[Add row]

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

(2.5.1) Identification and classification of potential water pollutants

Select from:

☑ Yes, we identify and classify our potential water pollutants

(2.5.2) How potential water pollutants are identified and classified

Our organization has an established process to identify and classify potential water pollutants that may affect ecosystems or human health. While our direct water use is limited mainly to washing and cleaning, we recognize that our key raw material, carton, is water-intensive in production and therefore represents a significant upstream dependency. In our own operations, we follow the ISO 14046 Water Footprint Standard and integrate water monitoring into our ISO 14001 Environmental Management System. Wastewater analyses are conducted and verified through independent laboratory reports. Results are compared against local legal discharge limits and international guidelines. The main parameters monitored include COD (Chemical Oxygen Demand), BOD (Biological Oxygen Demand), TSS (Total Suspended Solids), pH, heavy metals (lead, mercury, cadmium), nitrates, phosphates, and oils/grease. Any exceedance triggers corrective actions in line with ISO procedures. In the value chain, we assess risks indirectly through supplier declarations, sustainability certifications (FSC, PEFC), and the use of basin-level risk tools such as the WRI Aqueduct. These allow us to evaluate whether our suppliers operate in water-stressed regions and whether their processes carry risks of pollutant discharges. While we do not directly collect water quality reports from suppliers, we classify high-risk sourcing regions and engage suppliers through procurement criteria that require compliance with environmental regulations and sustainable water practices. By combining internal wastewater monitoring, certification-based supplier evaluation, and international standards, Duran Doğan ensures that potential water pollutants are systematically identified, classified, and managed. This approach minimizes risks to water quality and ecosystems while supporting long-term resource sustainability.
[Fixed row]

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

Row 1

(2.5.1.1) Water pollutant category

Select from:
☑ Other nutrients and oxygen demanding pollutants

(2.5.1.2) Description of water pollutant and potential impacts

Chemical oxygen demand is the amount of oxygen needed to oxidize the organic matter present in water. Chemical oxygen demand testing is used to determine the amount of oxidation that will occur and the amount of organic matter in a water sample.

(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

☑ Provision of best practice instructions on product use

☑ Reduction or phase out of hazardous substances

(2.5.1.5) Please explain

Pollution occurs in wastewater originating from the raw materials we consume. We measure this through independent test laboratories. We measure and track success according to the change in annual measurements.
[Add row]

C3. Disclosure of risks and opportunities

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

Climate change

(3.1.1) Environmental risks identified

Select from:

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

Water

(3.1.1) Environmental risks identified

Select from:

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

Plastics

(3.1.1) Environmental risks identified

Select from:

☑ No

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

Select from:

☑ Not an immediate strategic priority

(3.1.3) Please explain

Plastic inputs represent only 0.6% of our total raw materials, as 100% of our revenue is derived from paper-based packaging. Therefore, plastics are not considered a substantive risk factor for our business model. Nevertheless, we continue to invest in R&D to develop bio-degradable films, further reducing environmental impact and aligning with circular economy principles.
[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
☑ Changes to regulation of existing products and services

(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
☑ Finland
☑ Sweden
☑ Turkey

(3.1.1.9) Organization-specific description of risk

Our business relies entirely on board-based raw materials. Upcoming EU regulations represent a critical transition risk for our company. The EU Deforestation Regulation (EUDR), effective from December 2025, requires all forest-derived products to be fully traceable and proven deforestation-free. As we source a significant share of our raw materials from Finland and Sweden, any gap in supplier compliance or traceability may disrupt supply and restrict access to EU markets. We also source from Turkey, where EU regulations are expected to influence local legislation and where customers increasingly demand certified raw materials (FSC, PEFC). This raises the risk that non-certified materials will lose market acceptance, both in EU exports and in domestic sales. In addition, broader initiatives under the EU Green Deal are expected to strengthen requirements on sustainable product design, recyclability, and carbon reporting, increasing compliance obligations for our carton-based packaging. For Duran Doğan, these developments create the risk of higher input costs, compliance burdens, and potential loss of market access in the EU, particularly in export destinations such as France, Belgium, and Ireland.

(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

☑ Medium-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:

☑ Medium

(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

As our business model depends almost entirely on carton-based raw materials, stricter EU requirements such as the EUDR and related sustainable product design regulations represent a direct financial and strategic risk. We may face increased raw material costs (₺6.5m–₺13.0m, equivalent to 1–2% of raw material costs),

supply chain disruptions, and potential loss of access to EU markets if suppliers fail to meet certification and traceability requirements. This would directly impact our financial performance by raising procurement costs and constraining production volumes, leading to higher Cost of Goods Sold and reduced revenues from exports to key EU markets such as France, Belgium, and Ireland. Cash flows may tighten due to increased working capital needs and price volatility, while profit margins could erode if compliance costs cannot be fully passed on to customers. At the same time, strategic trade-offs must be managed: while compliance investments and supplier training increase short-term expenditures, they safeguard long-term EU market access, ensure alignment with our climate transition plan, and strengthen our positioning as a preferred supplier for global FMCG clients seeking certified and deforestation-free packaging.

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

Select from:

☑ Yes

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

6501580

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

13003160

(3.1.1.25) Explanation of financial effect figure

The estimated financial impact range of ₺6,501,580–₺13,003,160 has been calculated by applying an assumed 1%–2% increase in raw material costs. As more than 95% of our raw material consumption consists of cardboard sourced from Turkey, Finland, and Sweden, potential cost increases may arise due to stricter compliance with the EU Deforestation Regulation (EUDR, effective 2025) and related legislation influencing upstream suppliers. These figures represent the potential increase in procurement expenses and associated supply chain disruptions before considering any mitigation measures. The lower bound (₺6.5m) reflects moderate cost escalation from certification and compliance adjustments, while the upper bound (₺13.0m) represents more severe scenarios of limited access to certified materials, leading to higher procurement costs and potential revenue impacts from restricted EU market access.

(3.1.1.26) Primary response to risk

Diversification

☑ Develop new products, services and/or markets

(3.1.1.27) Cost of response to risk

141000

(3.1.1.28) Explanation of cost calculation

The estimated cost in the reporting year reflects expenditures on training programs and process adaptation to prepare for EUDR compliance. This includes costs for capacity-building sessions for procurement, sales, and supply chain teams, as well as system upgrades to enable supplier declarations and traceability checks. The figure represents the direct training and process integration budget allocated in 2024, which corresponds to approximately 0.007% of our 2024 revenue (₺2,003,012,837). These costs are considered a strategic investment to ensure compliance, safeguard EU market access, and prevent potential financial penalties under EUDR requirements.

(3.1.1.29) Description of response

This risk is overseen by the CEO and the Sustainability Committee, which reports to the Board of Directors. Mitigation measures are aligned with our climate transition plan and monitored quarterly. The cost of our response to EUDR compliance primarily relates to: • Training and process adaptation: We are investing in training for procurement, sales, and supply chain teams, as well as revising internal processes to incorporate supplier declarations and compliance checks. • Supplier engagement: Additional resources are allocated to monitoring suppliers, verifying geographic origin data, and supporting their compliance with EUDR requirements. These costs are considered necessary to secure EU market access, avoid potential penalties (up to 4% of annual EU-wide turnover), and maintain long-term competitiveness.

Water

(3.1.1.1) Risk identifier

Select from:

☑ Risk1

(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:

☑ Upstream value chain

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ Turkey

(3.1.1.7) River basin where the risk occurs

Select all that apply

☑ Maritsa

(3.1.1.9) Organization-specific description of risk

Our raw material strategy relies fully on recycled cardboard sourced in Turkey, where production processes are highly water-intensive. This creates exposure to water stress and regulatory changes. Long-term drought and reduced water availability may constrain operations at recycling facilities, leading to higher raw material prices passed through to us. In addition, stricter wastewater regulations may further increase compliance costs for suppliers. For Duran Doğan, this risk is upstream in our value chain and directly affects our procurement costs and supply continuity. Increased costs would reduce margins. Disruptions in supply would also affect our production scheduling and cash flows. To manage this risk, we are prioritizing localization and supplier diversification by engaging alternative domestic suppliers to reduce dependency on high-risk regions. At the same time, we continue to improve water efficiency in our own operations through Kaizen, 5S, and lean production practices, which optimize water consumption and strengthen resilience. Water stress scenarios are integrated into our corporate risk assessment to ensure proactive planning for potential disruptions.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased production costs

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

Select all that apply

☑ Medium-term

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

Select from:

☑ Likely

(3.1.1.14) Magnitude

Select from:

☑ Medium-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

Water stress and stricter wastewater regulations in Turkey, where we source all of our recycled carton, are expected to increase raw material costs. Higher procurement prices would directly raise our operating expenses. This would reduce profit margins and increase working capital requirements. In addition to cost increases, potential disruptions in recycled carton production due to water shortages could result in supply delays and reduced production volumes, directly affecting revenues.

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

Select from:

☑ Yes

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

6501580

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

13003160

(3.1.1.25) Explanation of financial effect figure

The estimated financial impact range of ₺6,501,580–₺13,003,160 has been calculated by applying an assumed 1%–2% increase in raw material costs. As more than 95% of our raw material consumption consists of cardboard sourced from Turkey, Finland, and Sweden, potential cost increases may arise due to stricter compliance requirements influencing upstream suppliers. These figures represent the potential increase in procurement expenses due to limited water availability for the production.

(3.1.1.26) Primary response to risk

Policies and plans

☑ Develop a climate transition plan

(3.1.1.27) Cost of response to risk

2641000

(3.1.1.28) Explanation of cost calculation

Our cost estimate covers both direct efficiency investments and supplier-focused capacity building. We allocated ₺2.5 million CAPEX to water-saving technologies such as greywater reuse, and reverse osmosis expected to deliver up to 40% efficiency. In parallel, we invested ₺141,000 in supplier engagement and training programs to raise awareness on water stewardship, ensure upstream alignment with our sustainability targets, and improve resilience against potential supply chain water risks. These costs are derived from approved project budgets and reflect our integrated approach of combining operational improvements with value chain engagement and also investments increase short-term CAPEX but provide long-term savings and risk mitigation.

(3.1.1.29) Description of response

To address the water stress risk in our recycled carton supply chain, Duran Doğan has implemented a multi-layered response strategy: Localization and shorter supply chains: We prioritize local sourcing and design shorter supply routes to reduce dependency on high water-risk regions. This approach both lowers our water footprint and improves resource efficiency. Supplier diversification: We have started engaging with alternative domestic suppliers of recycled carton to ensure supply continuity in case of regional water shortages or stricter wastewater regulations. Operational water efficiency: Within our own operations, we apply Kaizen, 5S, and lean production practices to regularly monitor and reduce water consumption. These initiatives improve operational efficiency and mitigate the financial impact of water-related cost increases. Risk assessment and contingency planning: As part of our corporate risk assessment system, water scarcity scenarios are mandatory in disaster recovery planning. For critical suppliers, water management performance reports are requested, and alternative suppliers in high-risk regions are evaluated. Through this integrated approach, we aim to reduce our vulnerability to water stress, secure supply continuity, and maintain financial resilience by lowering both procurement and operational risks.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk2

(3.1.1.3) Risk types and primary environmental risk driver

Chronic physical

☑ Heat stress

(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

☑ Finland

☑ Sweden

☑ Turkey

(3.1.1.9) Organization-specific description of risk

Our business depends on forest-based raw materials, primarily pulp and carton. According to the IPCC AR6, both boreal forests in Northern Europe (e.g., Finland and Sweden, our main sourcing countries) and Mediterranean forests (including Turkey, where we also source) face growing climate-related pressures. Heat stress, combined with prolonged droughts, more frequent wildfires, and pest outbreaks, reduces forest productivity and resilience. In boreal regions, warmer conditions are projected to trigger large-scale bark beetle infestations and increase forest disturbance, which may disrupt pulp supply chains and create market volatility. In Turkey and the wider Mediterranean basin, climate models identify the region as a "hotspot" where higher temperatures and chronic water scarcity will intensify wildfire risk and reduce forest regeneration capacity. For Duran Doğan, these impacts represent a chronic physical risk of disruption in our upstream supply chain. Lower availability of certified carton may increase raw material prices, lead to sourcing constraints, and reduce production capacity. Over the long term, these risks could materially affect revenues, margins, and competitiveness in international markets.

(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

☑ Medium-term

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

Select from:

☑ Likely

(3.1.1.14) Magnitude

Select from:

☑ Medium-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

Heat stress, combined with prolonged droughts, wildfires, and pest outbreaks, is expected to reduce forest productivity in Finland, Sweden, and Turkey, where we source our main raw material. This will likely cause disruptions in our upstream supply chain, resulting in decreased production and reduced sales income. The financial impact is estimated at ₺10–20 million over the long term, before mitigation measures. The maximum figure (₺20m) is above than our materiality threshold of 0.5% of 2024 revenues, while the upper bound reflects scenarios of severe supply shortages requiring procurement from higher-cost sources and causing production delays. These disruptions would erode margins, increase working capital requirements, and negatively affect cash flows due to higher advance payments, price volatility, and lower production volumes. While managing this risk may require higher upfront costs for supplier diversification, certification, and R&D into alternative materials, these trade-offs are expected to secure long-term supply continuity, reduce raw material price volatility, and protect margins and revenues against chronic climate impacts.

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

Select from:

☑ Yes

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

10000000

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

20000000

(3.1.1.25) Explanation of financial effect figure

The estimated financial impact range of ₺10–20 million over the long term is based on scenario analysis aligned with IPCC SSP5-8.5 projections and regional climate risk studies for Turkey, Finland, and Sweden. The calculation assumes a 0,5 - 1% increase in raw material procurement costs relative to our 2024 revenue of ₺2,003,012,837. Accordingly, the minimum impact (₺10 million, ~0.5% of 2024 revenue) reflects moderate disruptions in forest productivity leading to price increases, while the upper bound (₺20 million, ~1% of 2024 revenue) represents more severe conditions with extended droughts, heat stress, and wildfire events that reduce availability of certified carton and require sourcing from higher-cost suppliers. This approach provides a conservative estimate of potential financial exposure before considering mitigation actions such as supplier diversification, local sourcing, and investment in recycled raw materials.

(3.1.1.26) Primary response to risk

Diversification

☑ Increase supplier diversification

(3.1.1.27) Cost of response to risk

20840000

(3.1.1.28) Explanation of cost calculation

The cost estimate reflects our strategic investments and capacity-building efforts to reduce dependency on climate-sensitive raw materials such as carton sourced from Turkey, Finland, and Sweden. A key element is our TÜBİTAK 1832 R&D project (2021–2025) with a budget of 14.7 million used on developing high-barrier, recyclable cellulose-based packaging. In addition, our EBRD-supported PET film recycling line represents an investment of about ₺6 million, complemented by ₺2 million allocated in 2024 as R&D budget (~15% of annual CAPEX). We also invested ₺141,000 in training programs to strengthen supplier compliance with FSC/PEFC standards and support sustainable procurement practices. These expenditures were calculated from approved project budgets and reflect necessary costs to mitigate long-term supply chain disruptions linked to heat stress, drought, and wildfires.

(3.1.1.29) Description of response

To mitigate the long-term risk of upstream supply chain disruption caused by climate impacts on forests, we are increasing supplier diversification and expanding our use of certified raw materials (FSC, PEFC). Through these measures, we reduce dependency on vulnerable sources and support sustainable forestry practices that enhance forest resilience. In parallel, we are investing in R&D projects to identify and develop alternative raw materials that are less exposed to climate-related risks. These initiatives aim to strengthen supply security and reduce sensitivity to pulp and carton price volatility. As a member of the Forest Stewardship Council (FSC), we actively participate in sectoral initiatives that promote responsible sourcing and biodiversity protection, contributing to long-term ecosystem stability. Furthermore, we are enhancing supply chain visibility through digital monitoring systems, allowing us to track supplier performance and proactively respond to emerging risks. Overall, these actions reduce long-term procurement costs, secure continuity of certified raw material supply, and provide resilience against climate-induced disruptions in our upstream value chain.
[Add row]

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

Climate change

(3.1.2.1) Financial metric

Select from:

☑ Revenue

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

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)

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

Although climate- and water-related risks such as the EU Deforestation Regulation (EUDR), chronic heat stress on forest ecosystems, and water stress in recycled carton supply chains have been identified as medium- to long-term risks, our organization did not experience direct financial or operational impacts from these risks in

the 2024 reporting year. We have included these risks in our risk register and are implementing mitigation measures proactively (e.g., supplier diversification, FSC/PEFC certification, R&D on alternative raw materials, localization of supply, and digital traceability systems). These efforts aim to ensure that potential impacts do not materialize in the short term.

Water

(3.1.2.1) Financial metric

Select from:

☑ Revenue

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

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)

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

Although climate- and water-related risks such as the EU Deforestation Regulation (EUDR), chronic heat stress on forest ecosystems, and water stress in recycled carton supply chains have been identified as medium- to long-term risks, our organization did not experience direct financial or operational impacts from these risks in

the 2024 reporting year. We have included these risks in our risk register and are implementing mitigation measures proactively (e.g., supplier diversification, FSC/PEFC certification, R&D on alternative raw materials, localization of supply, and digital traceability systems). These efforts aim to ensure that potential impacts do not materialize in the short term.
[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

Turkey
☑ Maritsa

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

Select all that apply
☑ Upstream value chain

(3.2.6) Number of facilities in upstream value chain exposed to water-related risk in this river basin

1

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

Select from:
☑ Less than 1%

(3.2.11) Please explain

Our Hadımköy facility is located in the Ergene sub-basin, which forms part of the Maritza River Basin. Water use at this site is limited to domestic and washing purposes, and no substantive water-related risks have been identified in direct operations. At the same time, we also source recycled cardboard from Turkish suppliers located in the same basin. Since recycled carton production is water-intensive, upstream suppliers may be exposed to long-term water stress and stricter

wastewater regulations, which could indirectly increase procurement costs and affect supply availability. However, in the 2024 reporting year, no substantive financial impact was recorded from either direct operations or upstream suppliers, with estimated effects remaining below 1% of revenue.

Row 2

(3.2.1) Country/Area & River basin

Finland

☑ Kymijoki

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

Select all that apply

☑ Upstream value chain

(3.2.6) Number of facilities in upstream value chain exposed to water-related risk in this river basin

1

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

Select from:

☑ Less than 1%

(3.2.11) Please explain

We source certified cardboard from upstream suppliers located in Finland, within the Kymijoki river basin where pulp and paper industries are concentrated. While no direct facilities of Duran Doğan are present in this basin, upstream dependency creates potential exposure to water-related risks such as water stress and wastewater regulations. However, no substantive financial impact was recorded in 2024, with estimated effects below 1% of revenue.
[Add row]

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

(3.3.1) Water-related regulatory violations

Select from:

☑ No

(3.3.3) Comment

No fines, enforcement orders, or penalties were incurred in the reporting year. This outcome reflects the effectiveness of our ISO 14001-certified Environmental Management System, which includes continuous monitoring of water use, wastewater quality, and regulatory compliance. Independent third-party audits and regular reporting to local authorities ensure that all discharges remain within legal thresholds. In addition, employee training and internal audits are carried out to maintain high awareness and compliance standards.
[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?

We are not yet subject to a carbon pricing system; however, with the introduction of a national Emissions Trading System (ETS) in Turkey expected within the next three years, we have developed a forward-looking compliance strategy. This strategy is aligned with our 2030 climate and sustainability targets and supported by concrete investments already implemented. Our targets include a 42% reduction in Scope 1 and 2 emissions by 2030 (from a 2020 base year), the measurement and reduction of Scope 3 emissions, 100% use of recycled or FSC/PEFC-certified raw materials in exports by 2030, achieving 95% waste reduction/recycling by 2027, and ensuring that by 2030 85% of revenue is derived from recyclable, reusable, or compostable products. To support these goals, we have made significant investments in energy efficiency such as building insulation, LED lighting, and a heat recovery system, as well as renewable energy through rooftop solar installations. Process innovations include film-free metallization technology that reduces the plastic footprint of products and the EBRD-supported PET film recycling project, which converts laminated PET waste into granules for reuse, contributing to the circular economy and generating new revenue streams. These projects directly reduce exposure to future carbon pricing costs by lowering emissions at source. Operational efficiency improvements include the electrification of forklifts and pallet trucks, centralized collection of carton waste for recycling, and water-saving technologies such as reverse osmosis systems, which also reduce dependencies on climate-sensitive resources. In 2024, our R&D budget reached ₺2.8 million, while environmental efficiency projects were allocated ₺1.3 million, underscoring our commitment to integrating carbon risk management into financial planning. To further prepare for regulation, we have introduced an internal shadow carbon price to evaluate future compliance costs in investment decisions. If necessary, we anticipate complementing reduction measures with the purchase of allowances under the ETS and, where appropriate, high-quality carbon credits for residual emissions. Oversight lies with our Sustainability Committee, which monitors regulatory developments and ensures integration into our risk management and governance systems. This integrated approach ensures that when Turkey's ETS is

implemented, Duran Doğan will not only remain compliant but also strengthen long-term competitiveness, reduce exposure to carbon costs, and capture opportunities in low-carbon and sustainable packaging markets.

(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
☑ Increased availability of products with reduced environmental impact [other than certified products]

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ Turkey

(3.6.1.8) Organization specific description

Duran Doğan's strong R&D vision and investments in innovative, environmentally friendly packaging solutions create significant opportunities to capture growing demand for sustainable products. With the TÜBİTAK 1832-funded project (2021–2025), we are developing cellulose-based, recyclable high-barrier packaging materials that replace conventional plastic packaging, reducing environmental impacts while meeting food safety and high-barrier performance requirements. The project's favorable cost structure and short payback period (approx. 12 months) indicate strong scalability and market uptake. Complementing this, the EBRD-supported PET film recycling project enables us to separate PET films from laminated packaging and convert them into high-quality granules for reuse as raw materials, thereby contributing to the circular economy and opening new revenue streams. Together, these projects illustrate our broader R&D-driven transformation strategy, focusing on recyclable, compostable, and resource-efficient materials. They not only align with EU Green Deal requirements and evolving customer expectations but also position us as a preferred supplier to global brands seeking to reduce their Scope 3 emissions.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Increased revenues resulting from increased demand for products and services

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

Select all that apply

☑ Medium-term

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

Select from:

☑ Likely (66–100%)

(3.6.1.12) Magnitude

Select from:

☑ 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 expansion of our sustainable product portfolio is expected to increase revenues by responding to rising customer demand for eco-friendly packaging in both domestic and international markets. By 2030, recyclable and compostable products are targeted to represent 85% of our revenues, significantly enhancing competitiveness and long-term growth potential.

(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)

100000000

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

190000000

(3.6.1.23) Explanation of financial effect figures

The financial effect of this opportunity has been calculated as an increase in revenue between ₺100 million and ₺190 million in the medium term. The calculation is based on the company's 2024 operating revenue of approximately ₺1.9 billion. A 5–10% revenue growth range was applied, reflecting the expected increase in demand for sustainable packaging solutions. • Lower bound (₺100 million): Represents a conservative scenario of ~5% revenue increase, assuming moderate market adoption of recyclable and high-barrier paper-based packaging. • Upper bound (₺190 million): Represents a higher growth scenario of ~10% revenue increase, consistent with our 2030 target of generating 85% of total revenue from recyclable, reusable, or compostable products. The calculation considers the expected market uptake of products developed under the TÜBİTAK 1832 cellulose-based packaging project and the EBRD-supported PET recycling project, as well as anticipated customer preference shifts driven by EU Green Deal policies and Scope 3 reduction commitments. Assumptions include: • Continued investment in R&D and commercialization of new products; • Growing customer preference for certified and recyclable packaging; • Stable exchange rate and raw

material price environment in the medium term. This methodology ensures consistency with our risk and opportunity materiality threshold (0.5% of operating revenue) and aligns with sector practices in reporting financial effects under CDP.

(3.6.1.24) Cost to realize opportunity

25000000

(3.6.1.25) Explanation of cost calculation

The cost to realize this opportunity has been estimated at ₺25–30 million. This includes: • ₺14.7 million in fixed investments (equipment, facility adaptation) required under the TÜBİTAK 1832 cellulose-based packaging project; • ₺8.5 million for PET recycling lines supported by the EBRD project; •₺2.8 million annual R&D expenditure allocated in 2024 to support new product development; • ₺1.3 million for energy and resource efficiency projects directly related to sustainable product scaling. These figures represent cumulative investment costs prior to revenue realization. Operating costs for the new lines are expected to be offset by efficiency gains and additional revenue streams.

(3.6.1.26) Strategy to realize opportunity

Our strategy to realize this opportunity builds on a multi-pillar approach that integrates R&D, sustainable supply chain management, and renewable energy use into our core business model. 1. Scaling R&D and Innovation • Through the TÜBİTAK 1832 project, we are developing recyclable, high-barrier cellulose-based packaging to replace plastics, with clear commercialization and cost competitiveness targets. • With the EBRD-supported PET recycling line, PET waste is transformed into granules, creating circular raw materials and additional revenue streams. •Continuous R&D efforts aim to expand our sustainable product portfolio and meet our 2030 goal of deriving 85% of revenues from recyclable, reusable, or compostable products. 2. Preferred Supplier Positioning • By offering low-carbon and recyclable products, we help global brands and local firms meet their Scope 3 reduction targets, enhancing our position as a preferred supplier. • We are updating procurement criteria to prioritize certified (FSC/PEFC) and sustainable materials, ensuring alignment with both EU Green Deal requirements and evolving customer expectations. 3. Renewable Energy and Efficiency Integration • Investments in renewable energy (solar rooftop system, I-REC certificates) and efficiency upgrades (LED lighting, insulation, heat recovery) reduce operational emissions and energy costs. • These measures directly support compliance with anticipated carbon pricing mechanisms in Turkey and the EU, lowering exposure to regulatory costs. 4. Market Expansion and Financial Sustainability • We anticipate 5–10% revenue growth (₺100–190 million) from these opportunities, with a payback period of less than 12 months for TÜBİTAK project investments. • Integration of circular economy principles strengthens both our market competitiveness and access to green financing instruments. In summary, our strategy combines innovative product development, renewable energy integration, and sustainable sourcing to capture growing demand for environmentally friendly packaging, while ensuring resilience against future regulatory and market changes.

Water

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp1

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Resource efficiency

☑ Reduced water usage and consumption

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ Turkey

(3.6.1.6) River basin where the opportunity occurs

Select all that apply

☑ Maritsa

(3.6.1.8) Organization specific description

We are working on reusing our grey water to reduce water consumption. With this work, the water collected from sinks will be purified and used in toilet water and garden irrigation water. Since our water source is well water, we will also reduce resource consumption.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Reduced indirect (operating) costs

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

Select all that apply

☑ Medium-term

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

Select from:

☑ Likely (66–100%)

(3.6.1.12) Magnitude

Select from:

☑ Medium-low

(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

Since we do not have a serious water consumption, we only have water consumption due to personnel use. This is not a serious expense for us, but we will evaluate this opportunity for environmental sustainability.

(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)

500000

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

500000

(3.6.1.23) Explanation of financial effect figures

The estimated financial effect of ₺500,000 reflects the potential cost savings associated with our water efficiency initiatives. This figure has been calculated by applying our targeted 40% reduction in water consumption by 2030 to our current annual water sourcing and treatment costs at the Hadımköy facility, which relies on groundwater resources. The calculation considers current water tariffs and operational usage volumes in the reporting year. By reducing water intensity through investments in reverse osmosis and water reuse systems, as well as ongoing Kaizen and process optimization projects, we expect to significantly lower our water-related operating costs. These efficiency gains are anticipated to deliver cumulative savings of up to ₺500,000 in the medium term, while simultaneously contributing to improved resilience against potential water stress risks in the Maritsa (Meriç) River Basin.

(3.6.1.24) Cost to realize opportunity

2500000

(3.6.1.25) Explanation of cost calculation

We need to make an infrastructure investment for grey water recycling. The total cost of this system, which consists of a water collection and purification system, is approximately. However, feasibility studies are ongoing. This cost may change.

(3.6.1.26) Strategy to realize opportunity

Our strategy to realize this opportunity is based on implementing water efficiency, reuse and recycling practices across our operations: • Greywater recycling: Since 2022, we have been investing in systems to collect greywater (from sinks and other non-potable sources), treat it through a reverse osmosis and filtration system, and reuse it in toilet flushing and landscape irrigation, reducing our dependence on freshwater withdrawals from the Hadımköy basin. Operational efficiency initiatives: Through Kaizen and 5S programs as well as continuous process optimization, we target a 40% reduction in water consumption by 2030 (vs. 2020 baseline). • Sustainability-linked investments: We have implemented water treatment and recovery technologies such as closed-loop recycling systems, supported by external partners including EBRD-funded projects, ensuring alignment with ISO 14046 Water Footprint assessments. These measures not only prepare us for future water-related regulatory and physical risks but also strengthen our competitiveness as a sustainable packaging supplier to leading global and local brands.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp2

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Capital flow and financing

☑ Access to sustainability linked loans

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ Turkey

(3.6.1.8) Organization specific description

Our organization has the opportunity to access sustainability-linked loans and green financing instruments thanks to our ongoing sustainability investments and R&D projects. Through initiatives such as the TÜBİTAK 1832 project on recyclable high-barrier paperboard packaging and the EBRD-supported PET film recycling line, we demonstrate strong alignment with the EU Green Deal and national decarbonization policies. These projects enhance our credibility with financial institutions, enabling us to secure preferential financing terms such as reduced interest rates and improved access to liquidity. Accessing sustainability-linked loans not only lowers our financing costs but also allows us to accelerate investments in renewable energy, energy efficiency, and sustainable raw material sourcing. This contributes to both our emission reduction targets (42% Scope 1 and 2 reduction by 2030) and our circular economy goals, while also strengthening financial resilience and competitiveness.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Increased access to capital at lower/more favorable rates

(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

☑ 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:

☑ Low

(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

Access to sustainability-linked loans and green financing mechanisms, such as those provided by EBRD and other financial institutions, is expected to deliver measurable financial advantages. By securing loans at lower interest rates compared to conventional financing, Duran Doğan anticipates reduced cost of capital for major sustainability investments, including the TÜBİTAK 1832 R&D project on recyclable high-barrier packaging and the PET recycling expansion. This reduction in financing costs directly improves cash flow resilience by lowering annual interest expenses and freeing resources for further innovation and operational improvements. Over the medium term, cumulative financial benefits are estimated in the range of ₺1–3 million, primarily arising from 1–2 percentage point lower borrowing costs. This translates into improved profitability margins, greater liquidity to reinvest in renewable energy and process efficiency projects, and enhanced competitiveness in both domestic and export markets. In addition to the direct financial effect, preferential access to green finance supports long-term stability by reducing exposure to volatile credit markets and strengthening investor and stakeholder confidence in the company's transition strategy.

(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)

400000

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

800000

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

1000000

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

300000

(3.6.1.23) Explanation of financial effect figures

The financial effect of this opportunity has been estimated based on the potential cost advantages of securing sustainability-linked loans and green financing compared to conventional commercial loans. In the short term (0–1 year), we anticipate a benefit in the range of ₺400,000 to ₺800,000, primarily reflecting annual interest savings on existing sustainability-focused investments such as the TÜBİTAK 1832 R&D project and the PET recycling expansion supported by EBRD. In the medium term (1–10 years), as the volume of sustainability investments increases, the cumulative financial benefit is expected to be in the range of ₺1 million to ₺3 million. These estimates are derived by applying an assumed interest rate reduction of 1–2 percentage points to the projected capital requirements of our sustainability projects. The calculation approach relies on project-specific financials and investment budgets, with benefits directly linked to reduced borrowing costs. Importantly, such access to preferential financing is conditional upon the continuity of sustainability projects; without these initiatives, long-term access to favorable financing terms would not be possible. Therefore, this opportunity is critical not only for reducing immediate financing costs but also for sustaining our broader growth strategy, ensuring continuity of investments, and maintaining long-term competitiveness in domestic and export markets.

(3.6.1.24) Cost to realize opportunity

2000000

(3.6.1.25) Explanation of cost calculation

The realization of this opportunity does not require large-scale capital expenditures beyond our business-as-usual sustainability projects. Instead, costs are primarily related to ensuring continuous compliance with sustainability-linked financing criteria. These include expenses for sustainability certifications (e.g., FSC, PEFC, ISO 14001, ISO 14046), independent verification of emissions and water data, external consultancy support for CDP, TSRS/IFRS S1–S2 reporting, and the development of project-specific monitoring and evaluation systems. Annual expenditures for these activities are estimated in the range of ₺300,000–₺500,000, representing consultancy fees, audit and certification costs, and internal resource allocation. These costs are essential enablers for maintaining credibility, meeting eligibility requirements for sustainability-linked loans, and thereby unlocking preferential access to finance.

(3.6.1.26) Strategy to realize opportunity

Our strategy to realize this opportunity is based on integrating sustainability into our business model and ensuring continuous eligibility for green and sustainability-linked financing. This approach is coordinated by the Sustainability Committee and fully embedded into the company's risk management and investment decision processes. We implement projects that align with international frameworks (TSRS/IFRS S1–S2, TCFD) and EU regulations (such as EUDR and the European Green Deal) to demonstrate strong climate and nature alignment. By investing in renewable energy (on-site solar PV, I-REC purchases), energy efficiency (thermal insulation, heat recovery systems, LED conversion), and water efficiency (Kaizen and lean production), we reduce our environmental footprint and strengthen our position as a preferred borrower for sustainability-linked loans. In addition, we maintain internationally recognized certifications (FSC, PEFC, ISO 14001, ISO 14046, BRCGS PM) and provide transparent reporting through CDP, TSRS, and sustainability reports. These measures not only enhance credibility with financial institutions

such as EBRD, but also secure favorable loan conditions tied to sustainability performance. To further strengthen this opportunity, we continue R&D efforts (such as the TÜBİTAK 1832 project on recyclable high-barrier packaging and the PET recycling project supported by EBRD), which directly link innovation with green financing eligibility. By maintaining this integrated approach, we ensure long-term access to sustainability-linked finance, reduce capital costs, and support the growth and resilience of our business.
[Add row]

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

Climate change

(3.6.2.1) Financial metric

Select from:
☑ Revenue

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

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

In the reporting year, no substantive financial or strategic impact from climate-related opportunities has yet materialized. These opportunities, such as becoming a preferred supplier through low-emission and renewable-based production and the development of circular economy solutions (e.g., PET recycling and TÜBİTAK-supported cellulose-based barrier packaging), are part of our medium-term strategy (2025–2030). While investments, R&D, and renewable energy integration are already underway, their financial and strategic impacts are expected to be realized progressively in the coming years, supporting our 2030 targets of 42% Scope 1 & 2 emissions reduction and 85% revenue from recyclable, reusable, or compostable products.

Water

(3.6.2.1) Financial metric

Select from:

☑ Revenue

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

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

In the reporting year, no substantive financial or strategic impact from water-related opportunities has been realized. Our efforts, including Kaizen, 5S, and lean production practices, resource efficiency investments, and PET recycling that reduces water dependency in raw material supply, are ongoing. The benefits of these measures are expected to become evident in the medium term (2025–2030), when our projects will deliver measurable reductions in water intensity and enhance resilience against water stress in upstream supply chains. These opportunities are fully aligned with our ISO 14046 Water Footprint assessments and our long-term goal of supporting both operational efficiency and basin-level sustainability.
[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:

☑ Quarterly

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

Select all that apply

☑ 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

The Company has a published diversity, equality and inclusion policy that commits to equal opportunity, non-discrimination and an inclusive culture. It: • Protects employees across a wide range of characteristics (e.g., age, disability, ethnicity, family/marital status, gender identity/expression, language, national origin, physical/mental ability, political opinion, race, religion, sexual orientation, socio-economic status). • Applies to the full employment cycle: recruitment and selection, compensation and benefits, professional development and training, promotions and transfers, social programs, layoffs/terminations. • Requires respectful communication, teamwork and representation of diverse perspectives; supports work/life balance. •Mandates annual diversity awareness training for all employees and sets expectations for inclusive conduct at work and at company-supported events. • Establishes reporting and remediation: employees who believe they've experienced discrimination can seek support from a supervisor or HR; inappropriate behavior is subject to disciplinary action.

(4.1.6) Attach the policy (optional)

KGS01 EK2 Diversity, Equity and Inclusion Policy_Çeşitlilik, Eşitlik, Kapsayıcılık Politikası (+).pdf
[Fixed row]

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

Climate change

(4.1.1.1) Board-level oversight of this environmental issue

Select from:
☑ Yes

Water

(4.1.1.1) Board-level oversight of this environmental issue

Select from:
☑ Yes

Biodiversity

(4.1.1.1) Board-level oversight of this environmental issue

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

(4.1.1.2) Primary reason for no board-level oversight of this environmental issue

Select from:
☑ Not an immediate strategic priority

(4.1.1.3) Explain why your organization does not have board-level oversight of this environmental issue

Biodiversity is considered a relevant environmental issue for our upstream value chain (forest products as raw material), but it is not yet treated as an immediate strategic priority at the board level since our direct operations have no material biodiversity dependencies or impacts. Instead, biodiversity is managed through supplier selection, certification systems (FSC/PEFC), and integrated risk management processes that address compliance with current and upcoming regulations. The Board is informed of biodiversity-related risks and opportunities in this indirect context, but oversight is not assigned as a standalone agenda item until regulatory or market drivers make it a direct strategic necessity.
[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)

(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

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

Select from:
☑ Scheduled agenda item in every board meeting (standing agenda item)

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

Select all that apply

☑ Reviewing and guiding annual budgets
☑ Overseeing and guiding scenario analysis
☑ Overseeing the setting of corporate targets
☑ Monitoring progress towards corporate targets
☑ Overseeing and guiding value chain engagement
☑ Monitoring the implementation of the business strategy
☑ Overseeing reporting, audit, and verification processes
☑ Monitoring the implementation of a climate transition plan
☑ 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
☑ Approving corporate policies and/or commitments
☑ 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

(4.1.2.7) Please explain

For climate change, the CEO, in their role as Chair of the Sustainability Committee, ensures board-level oversight through several governance mechanisms. Environmental and climate-related topics are placed on the board agenda as standing item. The CEO oversees the setting of corporate climate targets, including the commitment to reduce Scope 1 and 2 GHG emissions by 42% by 2030 (base year 2020) and to achieve 100% certified or recycled raw materials in exports by 2030. These targets are developed by the Sustainability Committee and its working groups and reviewed and approved by the board. The CEO also supervises the monitoring of progress towards these targets. Regular reports on GHG emissions, renewable energy procurement, energy efficiency measures, and supplier sustainability performance are presented by the Sustainability Manager to the Committee and escalated to the board. KPIs are tracked, and where performance lags, the board requests corrective action plans. Through the mechanism of overseeing corporate strategy, the CEO ensures that climate considerations are embedded into the overall business strategy. For example, in 2024 the board reviewed and endorsed the Tubitak-funded R&D project on cellulose-based barrier packaging and the EBRD-supported PET recycling project, prioritizing these initiatives as key enablers of the company's low-carbon transition and circular economy approach. The CEO further integrates climate risks into the corporate risk management process, ensuring that transition risks (e.g., EUDR compliance, rising certified raw material costs) and physical risks (e.g., heat stress, drought impacts on upstream forestry supply) are analyzed and included in the company's risk register. The board discusses trade-offs between short-term cost implications and long-term resilience when approving mitigation actions. Finally, the CEO ensures that major capital expenditures are aligned with climate objectives, requiring that all investments—such as renewable energy systems, energy-efficient infrastructure, and sustainable production line upgrades—are evaluated for their contribution to decarbonization before board approval. Through these mechanisms, climate change is directly embedded into board-level decision-making, ensuring alignment between strategy, risk management, and financial planning, and strengthening the company's resilience to both transition and physical climate risks.

Water

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

Select all that apply

☑ Chief Executive Officer (CEO)

(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

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

Select from:

☑ Scheduled agenda item in every board meeting (standing agenda item)

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

Select all that apply

☑ Reviewing and guiding annual budgets
☑ Overseeing and guiding scenario analysis
☑ Overseeing the setting of corporate targets
☑ Monitoring progress towards corporate targets
☑ Overseeing and guiding value chain engagement
☑ Monitoring the implementation of the business strategy
☑ Overseeing reporting, audit, and verification processes
☑ Monitoring the implementation of a climate transition plan
☑ Approving corporate policies and/or commitments
☑ 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

☑ 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

(4.1.2.7) Please explain

For water, the CEO, as Chair of the Sustainability Committee, ensures board-level oversight by embedding water issues into multiple governance mechanisms. Water security is included as a standing agenda item for board meetings at least twice per year, reflecting both operational dependencies and upstream supply chain risks. The CEO oversees the setting of water-related corporate targets, including the company's commitment to achieve 30% water efficiency by 2030 through greywater reuse, rainwater harvesting, and lean production practices. These targets were defined by the Sustainability Committee's Environment & Climate Working Group and are monitored by the board to ensure progress. The CEO supervises the monitoring of progress towards these targets. Regular reports are presented to the board, including metrics on total water withdrawal, water intensity per production unit, and performance of efficiency projects such as reverse osmosis and greywater recycling systems. Deviations from targets trigger corrective actions, which are followed up in subsequent board meetings. Through the mechanism of overseeing corporate strategy, the board ensures that water risks and opportunities are integrated into strategic planning. For example, localization of recycled cardboard supply has been prioritized to reduce upstream water dependencies and costs, while new investments in wastewater treatment and greywater reuse have been endorsed to secure resilience against future water scarcity. Water risks are also integrated into the corporate risk management process, with upstream risks (e.g., water-intensive recycled cardboard production in Turkey) and potential regulatory tightening on wastewater discharge being assessed regularly. These risks are escalated to the board, where trade-offs between the cost of investments in water efficiency technologies and the long-term resilience of operations are explicitly considered. Additionally, the board evaluates capital expenditures for alignment with water stewardship goals. For example, projects such as rainwater harvesting infrastructure and reverse osmosis systems were approved with consideration of both their financial return (cost reduction in water bills) and their contribution to long-term sustainability commitments. Finally, the board acknowledges customer expectations and reputational drivers, as many global FMCG clients demand strong water stewardship across their supply chains. The CEO ensures that water issues are discussed not only in the context of compliance but also as a source of competitive advantage and preferred supplier positioning. Through these mechanisms, water security is firmly embedded into board-level decision-making, ensuring that strategic, financial, and risk management processes align with the company's long-term resilience and stakeholder expectations.
[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

Academic

☑ Undergraduate education (e.g., BSc/BA in environment and sustainability, climate science, environmental science, water resources management, environmental engineering, forestry, etc.), please specify

☑ Postgraduate education (e.g., MSc/MA/PhD in environment and sustainability, climate science, environmental science, water resources management, forestry, etc.), please specify

Additional training

☑ Course certificate (relating to environmental issues), please specify

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

Academic
☑ Undergraduate education (e.g., BSc/BA in environment and sustainability, climate science, environmental science, water resources management, environmental engineering, forestry, etc.), please specify
☑ Postgraduate education (e.g., MSc/MA/PhD in environment and sustainability, climate science, environmental science, water resources management, forestry, etc.), please specify

Additional training
☑ Course certificate (relating to environmental issues), please specify

[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:*

	Management-level responsibility for this environmental issue
	☑ 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

Executive level

☑ Chief Executive Officer (CEO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

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

Engagement

☑ Managing public policy engagement related to environmental issues

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

☑ Setting corporate environmental policies and/or commitments

Strategy and financial planning

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

Other
☑ Providing employee incentives related to environmental performance

(4.3.1.4) Reporting line

Select from:
☑ Reports to the board directly

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

Select from:
☑ Quarterly

(4.3.1.6) Please explain

At Duran Doğan, the CEO holds the highest management-level responsibility for climate change. The CEO integrates climate-related issues into the company's business strategy, annual budgets, and major capital expenditures, ensuring alignment with the organization's transition plan and emission reduction targets. Responsibilities include assessing future trends in carbon regulations and customer expectations, managing public policy engagement, setting corporate climate policies, and monitoring compliance with these commitments. The CEO also drives priorities related to low-carbon innovation, such as the development of recyclable and renewable packaging solutions, and provides incentives for employees to achieve climate-related KPIs. The CEO receives quarterly reports from the Sustainability Committee and Working Groups, which cover Scope 1, 2, and 3 emissions performance, scenario analysis updates, and the progress of R&D projects. These reports are reviewed, and strategic decisions are reported directly to the Board of Directors, ensuring climate issues are fully embedded in corporate governance.

Water

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Executive Officer (CEO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

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

Engagement

☑ Managing public policy engagement related to environmental issues

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

☑ Setting corporate environmental policies and/or commitments

Strategy and financial planning

☑ 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

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

☑ Managing priorities related to innovation/low-environmental impact products or services (including R&D)

Other

☑ Providing employee incentives related to environmental performance

(4.3.1.4) Reporting line

Select from:

☑ Reports to the board directly

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

Select from:

☑ Quarterly

(4.3.1.6) Please explain

For water-related issues, the CEO is also the most senior management-level position responsible for integrating water risks and opportunities into company operations and strategic planning. The CEO oversees policies on sustainable water use, ensures the inclusion of water efficiency and wastewater management measures in annual budgets, and approves major investments such as recycling systems, rainwater harvesting, and greywater reuse. The CEO is responsible for monitoring compliance with corporate commitments on water efficiency, while also assessing future risks from regulatory changes and water stress in upstream supply chains. Quarterly reports are submitted to the CEO by the Sustainability Committee and Environment & Climate Working Group, covering water footprint, operational efficiency projects, and supplier performance on water risks. Based on these reports, the CEO provides strategic guidance, allocates resources for water reduction projects, and reports progress to the Board of Directors. This ensures that water issues are addressed at the highest management level and integrated into long-term resilience planning.

Biodiversity

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Executive Officer (CEO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

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

Engagement

☑ Managing public policy engagement related to environmental issues

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

☑ Setting corporate environmental policies and/or commitments

Strategy and financial planning

☑ Managing annual budgets related to environmental issues

☑ Implementing the business strategy related to environmental issues
☑ Developing a business strategy which considers environmental issues
☑ Managing environmental reporting, audit, and verification processes
☑ Managing acquisitions, mergers, and divestitures related to environmental issues
☑ Managing major capital and/or operational expenditures relating to environmental issues
☑ Managing priorities related to innovation/low-environmental impact products or services (including R&D)

(4.3.1.4) Reporting line

Select from:
☑ Reports to the board directly

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

Select from:
☑ Quarterly

(4.3.1.6) Please explain

The CEO also assumes management-level responsibility for biodiversity, with accountability for integrating biodiversity considerations into procurement policies, product development, and supply chain management. The CEO sets and approves corporate policies that ensure sourcing from FSC and PEFC certified suppliers, aligning with global deforestation-free requirements and EU Deforestation Regulation. The CEO reviews quarterly reports from the Sustainability Committee and the Supply Chain & Ethics Working Group on biodiversity-related risks and supplier due diligence. These reports cover compliance with sourcing standards, performance of high-risk suppliers, and updates on new regulatory requirements. The CEO ensures that biodiversity risks are embedded in the company's strategy by guiding supplier engagement, approving budgets for certification systems, and supporting innovation in alternative raw materials. Progress and strategic decisions are reported to the Board of Directors on a quarterly basis, ensuring biodiversity considerations are integrated into overall governance, despite not being a direct operational impact area.

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

☑ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

☑ Managing engagement in landscapes and/or jurisdictions

☑ Managing supplier compliance with environmental requirements

☑ Managing value chain engagement related to environmental issues

Policies, commitments, and targets

☑ Measuring progress towards environmental corporate targets

☑ Measuring progress towards environmental science-based targets

☑ Setting corporate environmental targets

Strategy and financial planning

☑ Conducting environmental scenario analysis

☑ Implementing a climate transition plan

(4.3.1.4) Reporting line

Select from:

☑ Reports to the board directly

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

Select from:

☑ Quarterly

(4.3.1.6) Please explain

At the management level, climate change is overseen by the CEO and the Sustainability Committee. The CEO is responsible for embedding climate issues into business strategy, investment decisions, and annual budgets, ensuring alignment with long-term decarbonization goals. Complementing this, the Sustainability Committee manages the operational aspects, including scenario analysis, setting and monitoring of corporate emission reduction targets, and implementing the climate transition plan. Progress reports are reviewed quarterly, ensuring that climate dependencies, risks, and opportunities are fully integrated into management decisions and value chain engagement.

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

☑ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

☑ Managing engagement in landscapes and/or jurisdictions

☑ Managing supplier compliance with environmental requirements

☑ Managing value chain engagement related to environmental issues

Policies, commitments, and targets

☑ Measuring progress towards environmental corporate targets

☑ Measuring progress towards environmental science-based targets

☑ Setting corporate environmental targets

Strategy and financial planning

☑ Conducting environmental scenario analysis

☑ Developing a climate transition plan

☑ Implementing a climate transition plan

(4.3.1.4) Reporting line

Select from:

☑ Reports to the board directly

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

Select from:

☑ Quarterly

(4.3.1.6) Please explain

The CEO holds overall responsibility for integrating water-related risks and opportunities into strategic planning and major capital expenditure decisions. The Sustainability Committee supports this oversight by assessing operational and supply chain water dependencies, managing supplier compliance with water-related requirements, and tracking progress towards corporate water efficiency targets (e.g., 30% efficiency improvement by 2030). The Committee conducts scenario analyses on water availability and regulatory trends, ensuring that risks such as wastewater regulations or upstream water stress are systematically addressed and aligned with corporate 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

☑ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

☑ Managing engagement in landscapes and/or jurisdictions

☑ Managing supplier compliance with environmental requirements

☑ Managing value chain engagement related to environmental issues

Policies, commitments, and targets

☑ Measuring progress towards environmental corporate targets

☑ Measuring progress towards environmental science-based targets

☑ Setting corporate environmental targets

Strategy and financial planning

☑ Conducting environmental scenario analysis

☑ Developing a business strategy which considers environmental issues

☑ Developing a climate transition plan

☑ Implementing a climate transition plan

(4.3.1.4) Reporting line

Select from:

☑ Reports to the board directly

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

Select from:

☑ Quarterly

(4.3.1.6) Please explain

Biodiversity is managed at the senior level by the CEO and the Sustainability Committee. The CEO ensures that biodiversity considerations are reflected in business strategy, stakeholder engagement, and budgetary planning, especially in relation to sustainable sourcing. The Sustainability Committee is tasked with identifying and managing biodiversity-related dependencies and risks across the supply chain, monitoring supplier compliance with environmental requirements, and measuring progress towards biodiversity-related corporate targets. By integrating these issues into quarterly reviews, the Committee ensures that biodiversity risks and opportunities are consistently considered within the company's operations and long-term planning.

[Add row]

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

Climate change

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

Select from:

☑ Yes

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

10

(4.5.3) Please explain

Duran Doğan integrates sustainability into its core governance and HR processes, ensuring that environmental performance is not only managed at the board and committee level but also incentivized across the workforce. Monetary incentives are provided to management and employees based on the achievement of sustainability-related targets, and the total value of such incentives corresponds to approximately 10% of overall remuneration.

Water

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

Select from:

☑ Yes

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

10

(4.5.3) Please explain

Duran Doğan integrates sustainability into its core governance and HR processes, ensuring that environmental performance is not only managed at the board and committee level but also incentivized across the workforce. Monetary incentives are provided to management and employees based on the achievement of sustainability-related targets, and the total value of such incentives corresponds to approximately 10% of overall remuneration.
[Fixed row]

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

Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☑ Chief Executive Officer (CEO)

(4.5.1.2) Incentives

Select all that apply

☑ Bonus - % of salary

(4.5.1.3) Performance metrics

Strategy and financial planning

☑ Board approval of climate transition plan

☑ Shareholder approval of climate transition plan

☑ Achievement of climate transition plan

☑ Shift to a business model compatible with a net-zero carbon future

Emission reduction

☑ Reduction in absolute emissions

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

☑ Both Short-Term and Long-Term Incentive Plan, or equivalent

(4.5.1.5) Further details of incentives

The details of the incentive are related to energy use and overall efficiency. The KPIs are set around these parameter and the targets according to a transition.

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

With a c-suite incentive, Duran Doğan aims to manage the climate transition by promoting inner management. The climate transition KPIs and climate-related targets are aligned with the climate transition of Duran Doğan.

Water

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☑ Chief Executive Officer (CEO)

(4.5.1.2) Incentives

Select all that apply

☑ Bonus - % of salary

(4.5.1.3) Performance metrics

Targets

☑ Progress towards environmental targets

☑ Achievement of environmental targets

Strategy and financial planning

☑ Board approval of climate transition plan

☑ Shareholder approval of climate transition plan
☑ Achievement of climate transition plan
☑ Shift to a business model compatible with a net-zero carbon future

Resource use and efficiency
☑ Reduction in water consumption volumes – direct operations

(4.5.1.4) Incentive plan the incentives are linked to

Select from:
☑ Both Short-Term and Long-Term Incentive Plan, or equivalent

(4.5.1.5) Further details of incentives

The details of the incentive are related to energy use and overall efficiency. The KPIs are set around these parameter and the targets according to a transition.

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

With a c-suite incentive, Duran Doğan aims to manage the climate transition by promoting inner management. The climate transition KPIs and climate-related targets are aligned with the climate transition of Duran Doğan.
[Add row]

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

	Does your organization have any environmental policies?
	Select from:

	Does your organization have any environmental policies?
	☑ 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

(4.6.1.2) Level of coverage

Select from:

☑ Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

☑ Direct operations

☑ Upstream value chain

☑ Downstream value chain

(4.6.1.4) Explain the coverage

The sustainability policy of Duran Doğan Basım ve Ambalaj A.Ş. highlights their approach to sustainable development with a strong emphasis on minimizing the environmental impacts of their operations. The company aims to contribute to a livable future for upcoming generations by taking specific actions that promote the optimal use of resources and reduce pollution. The company is highly aware of the rapid pollution of the natural environment and the depletion of natural resources. To address these challenges, Duran Doğan Basım ve Ambalaj A.Ş. aims to raise awareness about sustainability starting from its employees, and spreading throughout society. This effort is aligned with their goal of protecting natural resources and ensuring sustainable development.

(4.6.1.5) Environmental policy content

Environmental commitments

☑ Commitment to a circular economy strategy

☑ Commitment to take environmental action beyond regulatory compliance

Water-specific commitments

☑ Commitment to reduce or phase out hazardous substances

☑ Commitment to control/reduce/eliminate water pollution

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

Select all that apply

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

(4.6.1.7) Public availability

Select from:

☑ Publicly available

(4.6.1.8) Attach the policy

KGS03 ENVIROMENTAL POLICY.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

☑ Science-Based Targets Initiative (SBTi)

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

Our 2030 climate goals were confirmed and validated by the development of science-based targets in 2023.
[Fixed row]

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

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

Select all that apply

☑ Yes, we engaged 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:

☑ No, but we plan to have one in the next two years

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

Select from:

☑ Unknown

(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

Duran Doğan Packaging has established a Sustainability Committee under the authority of the Board of Directors, chaired by the CEO, who is also a Board Member. This ensures board-level oversight of climate change, water and other environmental issues. The Committee meets at least twice a year with a standing agenda item on environmental issues, and operates through working groups on Environment & Climate, Product & Innovation, Supply Chain & Business Ethics, and Human & Social Sustainability. Governance and oversight: The Committee identifies priority topics (GHG emissions, water efficiency, resource use, waste, biodiversity), monitors progress against targets (e.g. 42% Scope 1–2 GHG reduction by 2030, 40% water efficiency improvement by 2030, 95% recycling by 2027), and ensures alignment with our long-term roadmap. It reports regularly to the Board, which reviews these updates when approving strategy, budgets and risk management. Policy engagement and alignment: The Committee monitors EU Green Deal regulations, the EU Deforestation Regulation (EUDR) and the upcoming Turkish Climate Law to evaluate potential impacts on operations and supply chains. Our external engagement is pursued via membership in industry associations, participation in TÜBİTAK R&D projects (e.g. cellulose-based barrier packaging) and collaboration with EBRD programs. This ensures alignment with global frameworks such as the Paris Agreement and EU sustainability standards. Decision-making and trade-offs: In 2024, the Board endorsed actions to mitigate regulatory risks, including expanding renewable energy sourcing (via I-REC and on-site solar) and updating supplier evaluation to require FSC/PEFC certifications and geographic sourcing declarations. While these actions create additional compliance and investment costs, they secure long-term benefits such as reduced regulatory risk, lower operational costs from efficiency, and increased access to sustainability-linked financing and export markets. Transparency and accountability: Environmental policies, including our Diversity, Equity and Inclusion Policy and the Sustainability Committee Terms of Reference, are publicly available. This governance system integrates climate and water considerations into strategy, financial planning and risk management, reflecting our commitment to sustainable growth and value creation.
[Fixed 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 :Europian Carton Makers Association (ECMA)

(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

Duran Doğan is an active member of the European Carton Makers Association (ECMA), which represents the European folding carton and cartonboard industry. ECMA has consistently emphasized that fiber-based packaging plays a key role in the transition to a low-carbon and circular economy, directly supporting the objectives of the European Green Deal and the Paris Agreement. Through its Sustainability Committee and initiatives such as the 4Evergreen alliance, ECMA advocates for policy frameworks that recognize the contribution of renewable and recyclable carton packaging to reducing greenhouse gas emissions and achieving climate neutrality. Our corporate strategy is fully consistent with this position. Duran Doğan prioritizes the use of recycled and certified fiber (FSC/PEFC), invests in energy efficiency and renewable energy, and develops innovative products such as recyclable high-barrier paper packaging to replace plastics. These initiatives reduce Scope 1 and 2 emissions while enabling our customers to lower their Scope 3 emissions, creating alignment across the value chain. By doing so, we support the Paris Agreement's goal of limiting global warming to 1.5°C and achieving net zero by mid-century. We also share ECMA's evidence-based approach to regulation: supporting ambitious environmental standards while cautioning against one-size-fits-all reuse targets that could inadvertently increase carbon emissions, as highlighted in ECMA's recent policy studies. Our position therefore remains consistent with ECMA's advocacy: we promote policies that accelerate the shift to renewable, circular packaging while ensuring that climate goals are achieved in an effective, science-based, and economically viable manner. Through our

membership and direct corporate commitments, Duran Doğan ensures that its own climate targets, investments, and product development not only align with ECMA's sustainability agenda but also contribute to global and European efforts to deliver the Paris Agreement.

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

318326

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

As a member of the European Carton Makers Association (ECMA), Duran Doğan engages in sector-wide initiatives to promote low-carbon and circular packaging solutions. Through this membership, we aim to follow EU regulatory developments closely, contribute to policy discussions on sustainable product design and resource efficiency, and align our own transition strategy with emerging European Green Deal objectives. ECMA provides a platform to exchange knowledge, share best practices, and collectively advocate for policies that support the shift toward renewable, recyclable and deforestation-free packaging. How this engagement could influence policy: By actively participating in ECMA's working groups and consultations, Duran Doğan contributes to shaping EU-level policy frameworks in line with the Paris Agreement. This collaboration strengthens our ability to anticipate regulatory changes such as the EU Deforestation Regulation and evolving carbon pricing mechanisms, while also supporting harmonized sustainability standards across Europe. Through ECMA, we help ensure that the voice of the packaging sector is represented in policymaking, enabling regulations that are both ambitious in reducing environmental impacts and practical for businesses to implement.

(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, in line with environmental disclosure standards or frameworks

(4.12.1.2) Standard or framework the report is in line with

Select all that apply
☑ GRI
☑ IFRS
☑ TCFD

(4.12.1.3) Environmental issues covered in publication

Select all that apply
☑ Climate change
☑ Water
☑ Biodiversity

(4.12.1.4) Status of the publication

Select from:
☑ Underway - this is our first year

(4.12.1.5) Content elements

Select all that apply

☑ Strategy
☑ Governance
☑ Emission targets
☑ Emissions figures
☑ Risks & Opportunities
☑ Content of environmental policies
☑ Value chain engagement
☑ Dependencies & Impacts
☑ Public policy engagement
☑ Water accounting figures
☑ Water pollution indicators

(4.12.1.8) Comment

In addition to our CDP disclosure, Duran Doğan publishes its environmental strategy and performance through multiple reporting channels. Our GRI-based Sustainability Report and TSRS (IFRS S1 and S2 aligned) Sustainability Report provide comprehensive disclosure of environmental issues, including greenhouse gas emissions, water management, waste, biodiversity considerations, and supply chain engagement. These reports detail our governance structure, strategic targets, risk and opportunity assessments, and value chain mapping, and they follow globally recognized frameworks such as GRI, IFRS/TSRS, SASB, and TCFD. Environmental data and performance indicators are also integrated into our annual financial reporting, ensuring consistency between financial and non-financial information. This integration enables stakeholders to assess the financial implications of environmental risks and opportunities alongside the company's financial results. Through these publications, we ensure transparency in our response to climate change, water security, and other environmental issues, and we align our disclosures with internationally recognized best practices, thereby supporting investor confidence and compliance with evolving regulatory requirements.
[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:

☑ Every two years

Water

(5.1.1) Use of scenario analysis

Select from:

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

(5.1.3) Primary reason why your organization has not used scenario analysis

Select from:

☑ Not an immediate strategic priority

(5.1.4) Explain why your organization has not used scenario analysis

Sustainability is the focal point for Duran Doğan, and climate-related decision-making is the main driving force when deciding on our strategy. However currently at Duran Doğan, we focus on sustainable products and reducing emissions from our operations. We acknowledge that using climate-related scenario analysis to inform our strategy is important. But currently, we have our focus on priorly mentioned topics. We will conduct climate-related scenario analysis in the upcoming two years

[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:
☑ Business activity

(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

2024

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2030

☑ 2050

(5.1.1.9) Driving forces in scenario

Finance and insurance

☑ Cost of capital

☑ Sensitivity of capital (to nature impacts and dependencies)

Stakeholder and customer demands

☑ Consumer sentiment

☑ Consumer attention to impact

☑ Impact of nature footprint on reputation

☑ Impact of nature service delivery on consumer

Regulators, legal and policy regimes

☑ Global regulation

☑ Global targets

Macro and microeconomy

☑ Globalizing markets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

This scenario assumes that global warming is limited to 1.5°C with stringent climate policies, carbon prices rising to USD 100–250/tCO2 by 2030 and 200–500/tCO2 by 2050, and rapid growth in demand for certified and recyclable packaging materials. Uncertainty remains regarding the pace and scope of carbon pricing in Turkey, the speed of technology cost reductions, and customers' willingness to pay for low-carbon products. Constraints include limited Scope 3 data, incomplete information on long-term regional forest resource availability, and evolving national regulatory frameworks.

(5.1.1.11) Rationale for choice of scenario

IEA NZE2050 was chosen as it is fully aligned with Duran Doğan's SBTi commitment to reduce Scope 1 and 2 emissions by 42% by 2030. It represents a Paris-aligned pathway and allows us to stress-test our resilience against strong transition drivers such as carbon pricing, stricter regulation, and rising customer expectations, while identifying opportunities from green finance, renewable energy, and circular economy solutions.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 8.5

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☑ SSP5

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Business activity

(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:

☑ 4.0ºC and above

(5.1.1.7) Reference year

2024

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2030

☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Number of ecosystems impacted

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

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

Regulators, legal and policy regimes

☑ Global regulation

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

This scenario assumes continued reliance on fossil fuels, limited climate policy action, and global warming exceeding 3°C by 2100, with carbon prices remaining very low (0–20 USD/tCO2 in 2030, 10–40 USD/tCO2 in 2050). It highlights significant physical risks, including heat stress, droughts, wildfires, and water stress affecting

forests in Turkey, Finland, and Sweden. Uncertainty lies in the frequency and severity of extreme weather events, trade policy responses, and the degree of volatility in pulp and cardboard markets. Constraints include the lack of detailed regional modeling and limited financial quantification of supplier-level physical impacts.

(5.1.1.11) Rationale for choice of scenario

SSP5-8.5 was selected as a "worst-case" benchmark to understand the vulnerability of our business model to severe physical risks. It enables us to test the resilience of our upstream supply chain—particularly forest-based raw materials—and our water dependencies, while contrasting the potential losses under inaction with the benefits of pursuing a net zero-aligned strategy.
[Add row]

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

Climate change

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

Select all that apply

☑ Risk and opportunities identification, assessment and management

☑ Strategy and financial planning

☑ Resilience of business model and strategy

☑ Target setting and transition planning

(5.1.2.2) Coverage of analysis

Select from:

☑ Business activity

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

The scenario analysis demonstrated that Duran Doğan's business strategy, financial planning, and transition roadmap are highly sensitive to both transition and physical risk drivers. Under the IEA Net Zero 2050 (1.5°C) scenario, carbon pricing is projected to significantly increase operational costs, particularly for energy use. However, our existing investments in renewable energy (solar PV, I-REC purchases), energy efficiency, and circular product innovation mitigate these impacts. This scenario also reveals strong opportunities: enhanced access to sustainability-linked finance, increased demand for low-carbon and recyclable packaging, and preferred supplier status with global FMCG clients. Consequently, we have embedded a 2030 emission reduction target (-42% Scope 1 and 2 vs. 2020) into our financial planning and capital allocation, ensuring that future CAPEX is aligned with transition objectives. In contrast, the IPCC SSP5-8.5 (3°C+) scenario underscores

high physical risk exposure, particularly heat stress, drought, and wildfires affecting upstream forest resources in Turkey, Finland, and Sweden. These risks may disrupt supply chains, increase raw material costs, and generate production delays. As a result, we are strengthening supplier diversification, local sourcing of recycled cardboard, and water efficiency measures (targeting 30% reduction by 2030). Financial planning incorporates stress-testing of supply chain costs and insurance premiums under worsening climate conditions. Overall, the scenario analysis confirmed the importance of accelerating our transition investments while building resilience against supply chain and water risks. These outcomes are fully integrated into our risk assessment, dependency analysis, opportunity mapping, and transition planning, ensuring consistency with both financial performance and long-term strategic resilience.
[Fixed row]

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

(5.2.1) Transition plan

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

(5.2.3) Publicly available climate transition plan

Select from:
☑ Yes

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

Select from:
☑ Yes

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

Duran Doğan strategy includes a climate transition plan that is fully aligned with global net-zero objectives and the Paris Agreement. The plan commits to ensuring that all spending, revenues, and activities contribute to the transition to a low-carbon economy, with a clear exclusion of fossil fuel–related investments. Key activities under this commitment include: - Renewable energy adoption: Installation of on-site solar capacity and procurement of renewable electricity through I-REC certificates to eliminate Scope 2 emissions. - Energy efficiency measures: Continuous investments in LED lighting, thermal insulation, and heat recovery systems to reduce energy demand across operations. - Circular economy and R&D: Scaling up recycling initiatives such as PET film granulation and TÜBİTAK-supported projects to

replace plastic with recyclable, cellulose-based barrier packaging. These innovations reduce lifecycle emissions and dependence on fossil-based materials. - Water efficiency: Greywater reuse, rainwater harvesting, and reverse osmosis projects to ensure resource efficiency and resilience in line with IFRS S2 physical risk management. - Supply chain alignment: Increasing the share of FSC/PEFC certified raw materials and localizing supply to minimize upstream carbon and water dependencies. - National and sectoral alignment: Our strategy supports Turkey's pathway to increase the share of renewables in the national electricity mix and aligns with emerging ETS and CBAM frameworks in the EU, ensuring our competitiveness in export markets. The transition plan is reviewed annually by the Sustainability Committee and reported to the Board of Directors, ensuring that targets, financial planning, and investments remain aligned with both our corporate net-zero pathway and evolving regulatory and market expectations.

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

Select from:

☑ Our climate transition plan is voted on at Annual General Meetings (AGMs)

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

Our climate transition plan is built on several key assumptions and dependencies. First, it assumes continued regulatory support and incentives for transitioning to low-carbon production methods, such as energy efficiency programs and renewable energy subsidies. Additionally, the availability of recycled or responsible materials is a critical dependency, as our transition plan includes a significant shift towards using recycled paper or FSC certified paper in our production processes. Technological advancements in energy-efficient machinery and processes are also key, as we rely on continued innovations to reduce our energy consumption and carbon emissions. Finally, we assume stable market demand for sustainable packaging solutions, which will drive our investment in green technologies and lower carbon footprint solutions.

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

In 2024, Duran Doğan made significant progress towards its climate transition plan, achieving a 62% reduction in total GHG emissions compared to the previous year. This outcome reflects both efficiency measures and renewable energy adoption. Operational optimization and process fine-tuning were implemented across production facilities, reducing fossil fuel use and electricity demand. A heat recovery system for compressors was commissioned at the Hadımköy facility, alongside repair and optimization of control valves. These measures saved ~46,000 m³ of natural gas within four months, avoiding ~90 tCO_2e in annualized Scope 1 emissions and generating ~₺880,000 in cost savings. Renewable electricity consumption was scaled up through the purchase of I-REC certificates equivalent to 8.59 GWh and onsite rooftop solar PV generation of 1.7 MWh. Together, these initiatives eliminated the majority of Scope 2 emissions on a market-based approach and supported alignment with global net-zero pathways. These activities demonstrate measurable progress against our transition plan commitments by simultaneously lowering emissions, reducing operational costs, and strengthening resilience against future regulatory carbon costs. The Sustainability Committee oversees progress and reports annually to the Board, ensuring alignment with long-term targets and strategic objectives.

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

Duran Doğan 2024 9-12.pdf,Duran Doğan 2024.4-8.pdf,Atlas Ofset 2024 9-12.pdf,Duran Doğan.pdf

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

Select all that apply

☑ Water

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

In our climate transition plan, we have considered other environmental issues such as water usage. Our operations have very low water consumption, as the primary water use is limited to personnel needs rather than production processes. This allows us to focus more on reducing energy consumption and emissions, which are the major environmental concerns in our industry. By maintaining minimal water usage, we ensure that our operations have a limited impact on local water resources, further supporting our overall sustainability goals.
[Fixed row]

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

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

Select from:

☑ Yes, both strategy and financial planning

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

Select all that apply

☑ Products and services

☑ Upstream/downstream value chain

☑ Investment in R&D

☑ Operations

[Fixed row]

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

Products and services

(5.3.1.1) Effect type

Select all that apply

☑ Risks

☑ Opportunities

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

Select all that apply

☑ Climate change

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

Environmental risks, particularly those related to climate change, have led us to prioritize the development of low-carbon products and services. We have implemented strategies to minimize the carbon footprint of our products by using sustainable materials and energy-efficient production processes. Opportunities arising from climate change have encouraged us to introduce new eco-friendly product lines that cater to the growing demand for green solutions, enhancing our market position.

Upstream/downstream value chain

(5.3.1.1) Effect type

Select all that apply

☑ Risks

☑ Opportunities

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

Select all that apply

☑ Climate change

☑ Water

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

Environmental risks related to climate change and water have prompted us to reassess our supply chain and logistics operations. We have started to collaborate more closely with suppliers who follow sustainable practices and reduced water usage. Opportunities have arisen by improving resource efficiency, reducing emissions during transportation, and optimizing water use across the supply chain. These steps have not only lowered costs but also improved our overall environmental performance.

Investment in R&D

(5.3.1.1) Effect type

Select all that apply

☑ Risks

☑ Opportunities

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

Select all that apply

☑ Climate change

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

We have increased our investment in R&D to address the environmental risks posed by climate change. Our focus has been on developing innovative solutions that help mitigate the impacts of climate change, such as more sustainable materials and energy-efficient technologies. This investment has also opened opportunities, allowing us to stay ahead of market trends and offer products that support a circular economy and lower carbon footprint.

Operations

(5.3.1.1) Effect type

Select all that apply

☑ Risks

☑ Opportunities

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

Select all that apply

☑ Climate change

☑ Water

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

In response to the risks from climate change and water scarcity, we have made significant changes to our operations. We have optimized our energy use and reduced water consumption through recycling initiatives and the implementation of energy-efficient technologies. These operational adjustments have also created opportunities for cost savings, better resource management, and improved sustainability across our facilities.
[Add row]

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

Row 1

(5.3.2.1) Financial planning elements that have been affected

Select all that apply

☑ Revenues

☑ Direct costs

☑ Indirect costs

☑ Capital expenditures

(5.3.2.2) Effect type

Select all that apply

☑ Risks

☑ Opportunities

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

Select all that apply

☑ Climate change

☑ Water

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

The changing market behaviors of the customer are constantly pushing us to make new investments in new product development and R&D activities. However, due to the impacts of climate change related to forests in our supply chain, we may be financially affected in terms of cost and accessibility.
[Add row]

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

	Identification of spending/revenue that is aligned with your organization's climate transition	Methodology or framework used to assess alignment with your organization's climate transition
	Select from: ☑ Yes	*Select all that apply* ☑ Other methodology or framework

[Fixed row]

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

Row 1

(5.4.1.1) Methodology or framework used to assess alignment

Select from:
☑ Other, please specify :Internal Method

(5.4.1.5) Financial metric

Select from:

☑ Revenue/Turnover

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

4000000

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

0.2

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

0.5

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

1.5

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

Duran Doğan applies a project-based financial tracking methodology to evaluate the alignment of expenditures and revenues with its climate transition plan. All R&D budgets, capital expenditures, and operational expenditures are screened against the company's climate-related targets and transition pathways, which are based on SBTi-validated emission reduction targets and IFRS S2 disclosure requirements. • Investment screening: Expenditures are mapped against categories that contribute to decarbonization, such as renewable energy procurement (e.g., solar power systems and I-REC certificates), energy efficiency (e.g., LED retrofits, heat recovery systems), water efficiency (e.g., greywater reuse, reverse osmosis), and circular economy projects (e.g., PET film recycling). • Revenue screening: Revenue streams are evaluated to determine the share derived from low-carbon, recyclable, or resource-efficient packaging products in line with EU Taxonomy criteria and national sustainable finance principles. • Exclusion criteria: Spending that contributes to increased fossil fuel dependency, non-recyclable material use, or high-carbon processes is excluded from climate-aligned categories. This methodology ensures that 100% of the R&D budget, and significant portions of CAPEX related to renewable energy, water efficiency, and circular economy projects, are classified as climate-transition aligned. Percentages are calculated by dividing aligned spending by the total annual budget or revenue, ensuring consistency across financial reporting and eliminating the risk of overstating green contributions. [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)

15

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

0

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

-40

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

-40

(5.9.5) Please explain

In the reporting year, water-related CAPEX increased due to investments in efficiency and recycling technologies, including reverse osmosis and greywater reuse systems. These accounted for approximately 15% of our total CAPEX. We anticipate a continued increase in water-related CAPEX in the next reporting year as we expand rainwater harvesting and water recycling projects to achieve our long-term target of 30% efficiency improvement by 2030. Water-related OPEX is decreasing as a result of these efficiency measures. The systems implemented are expected to reduce our operational water use by up to 40%, which translates into significant cost savings (around 2% of total OPEX). We anticipate this downward trend in water-related OPEX to continue in the next reporting year as savings from efficiency projects are fully realized.
[Fixed row]

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

	Use of internal pricing of environmental externalities	Environmental externality priced
	Select from: ☑ Yes	*Select all that apply* ☑ Carbon

[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 energy efficiency

☑ Incentivize consideration of climate-related issues in decision making

☑ Influence strategy and/or financial planning

(5.10.1.3) Factors considered when determining the price

Select all that apply

☑ Scenario analysis

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

Duran Doğan applies an internal shadow carbon price aligned with international scenarios to guide investment and financial planning decisions. The price range of €60–90/tCO_2e was defined by benchmarking against the IEA Net Zero Emissions by 2050 (2021) scenario for 1.5°C alignment and the IPCC AR6 high-emission pathway (SSP5-8.5) to capture transition and physical risk perspectives. This range reflects both short- to medium-term EU ETS price expectations (around €75/tCO_2e in 2024, according to the World Bank State and Trends of Carbon Pricing 2024) and long-term decarbonization trajectories projecting €200–500/tCO_2e by 2050. Assumptions include a gradual tightening of EU and national climate regulations, increasing renewable energy adoption in Turkey and Europe, and ongoing efficiency gains from our R&D and lean production initiatives. The shadow price is applied in evaluating capital investments, supplier choices, and low-carbon product development to anticipate future cost exposures and identify opportunities for efficiency and green finance access.

(5.10.1.5) Scopes covered

Select all that apply

☑ Scope 1

☑ Scope 2

☑ Scope 3, Category 1 - Purchased goods and services

(5.10.1.6) Pricing approach used – spatial variance

Select from:

☑ Differentiated

(5.10.1.7) Indicate how and why the price is differentiated

Price may vary depending on the commodity market.

(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

Price may vary depending on the commodity market.

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

1966

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

2950

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

Select all that apply

☑ Capital expenditure

☑ Operations

☑ Procurement

☑ Product and R&D

☑ Opportunity management

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

Select from:

☑ Yes, for all decision-making processes

(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

The internal shadow carbon price is reviewed and monitored by the Sustainability Committee, chaired by the CEO. The committee evaluates international carbon price developments, including EU ETS benchmarks and scenario-based projections, and ensures that the selected range (€60–90/tCO_2e) remains aligned with regulatory and market trends. Emissions across Scope 1, 2, and 3 are tracked regularly through our sustainability reporting system, with results presented quarterly to the committee. During these reviews, the potential financial implications of the carbon price—such as impacts on energy costs, raw material sourcing, product pricing, and supply chain dependencies—are assessed. The committee also integrates these findings into the company's strategic and financial planning, ensuring that carbon cost considerations are embedded in investment decisions, supplier engagement, and long-term risk management.

[Add row]

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

	Engaging with this stakeholder on environmental issues	Environmental issues covered
Suppliers	*Select from:* ☑ Yes	*Select all that apply* ☑ Climate change ☑ Water
Customers	*Select from:* ☑ Yes	*Select all that apply* ☑ Climate change
Investors and shareholders	*Select from:* ☑ Yes	*Select all that apply* ☑ Climate change ☑ Water
Other value chain stakeholders	*Select from:* ☑ Yes	*Select all that apply* ☑ Climate change

[Fixed row]

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

Climate change

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

Select from:

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

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

Select all that apply

☑ Contribution to supplier-related Scope 3 emissions

☑ Dependence on ecosystem services/environmental assets

(5.11.1.3) % Tier 1 suppliers assessed

Select from:

☑ 76-99%

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

We assess suppliers mainly by material type and emission contribution. As over 95% of our purchases are paperboard, cardboard and related inputs, suppliers providing these are prioritized. We require FSC/PEFC certification, monitor GHG emission data (Scope 3), and review compliance with national/EU climate regulations. This ensures high-impact suppliers are identified and managed in line with our climate targets.

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

Select from:

☑ 76-99%

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

330

Water

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

Select from:

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

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

Select all that apply

☑ Dependence on water

(5.11.1.3) % Tier 1 suppliers assessed

Select from:

☑ 76-99%

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

We classify suppliers with substantive water impacts based on their water intensity and regulatory dependencies. Paperboard suppliers in Turkey, Finland and Sweden, representing over 95% of our procurement, are prioritized due to potential water stress and withdrawal permits. We monitor water use data, encourage recycled/FSC-certified sourcing, and engage suppliers to improve water efficiency and reduce upstream water risks.

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

Select from:

☑ 76-99%

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

330
[Fixed row]

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

Climate change

(5.11.2.1) Supplier engagement prioritization on this environmental issue

Select from:

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

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

Select all that apply

☑ In line with the criteria used to classify suppliers as having substantive dependencies and/or impacts relating to climate change

☑ Material sourcing

(5.11.2.4) Please explain

We prioritize engaging with suppliers of our key raw materials, such as cardboard, plastic film, resin, and ink, as these materials have the most significant environmental impact. Other suppliers, such as those providing office supplies or basic necessities, are currently not within the scope of our environmental engagement efforts.

Water

(5.11.2.1) Supplier engagement prioritization on this environmental issue

Select from:

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

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

Select all that apply

☑ In line with the criteria used to classify suppliers as having substantive dependencies and/or impacts relating to water

☑ Procurement spend

(5.11.2.4) Please explain

We prioritize engaging with suppliers of our key raw materials, such as cardboard, plastic film, resin, and ink, as these materials have the most significant environmental impact. Other suppliers, such as those providing office supplies or basic necessities, are currently not within the scope of our environmental engagement efforts.
[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

our suppliers are required to meet specific environmental requirements as part of our purchasing process. These requirements include adherence to sustainable sourcing practices, compliance with environmental regulations, and efforts to reduce carbon emissions. We prioritize suppliers who demonstrate a commitment to reducing their environmental impact, particularly in key materials such as cardboard, plastic film, resin, and ink. This approach ensures that we are fostering environmental responsibility throughout our supply chain, aligning with our broader sustainability goals.

Water

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

Select from:

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

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

Select from:

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

(5.11.5.3) Comment

our suppliers are required to meet specific environmental requirements as part of our purchasing process. These requirements include adherence to sustainable sourcing practices, compliance with environmental regulations, and efforts to reduce carbon emissions. We prioritize suppliers who demonstrate a commitment to reducing their environmental impact, particularly in key materials such as cardboard, plastic film, resin, and ink. This approach ensures that we are fostering environmental responsibility throughout our supply chain, aligning with our broader sustainability goals.
[Fixed row]

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

Climate change

(5.11.6.1) Environmental requirement

Select from:
☑ Implementation of emissions reduction initiatives

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply
☑ Certification
☑ 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:
☑ 76-99%

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

Select from:
☑ 76-99%

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

Select from:
☑ Retain and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:
☑ Less than 1%

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply
☑ Providing information on appropriate actions that can be taken to address non-compliance

(5.11.6.12) Comment

There is no additional comment.

Water

(5.11.6.1) Environmental requirement

Select from:

☑ Environmental disclosure through a public platform

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

☑ Certification

☑ 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%

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

Select from:

☑ 76-99%

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

Select from:

☑ 76-99%

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

Select from:

☑ Retain and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:
☑ Less than 1%

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply
☑ Providing information on appropriate actions that can be taken to address non-compliance

(5.11.6.12) Comment

There is no additional comment.
[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:
☑ Emissions reduction

(5.11.7.3) Type and details of engagement

Capacity building
☑ Provide training, support and best practices on how to make credible renewable energy usage claims
☑ Provide training, support and best practices on how to measure GHG emissions
☑ Provide training, support and best practices on how to mitigate environmental impact
☑ Support suppliers to set their own environmental commitments across their operations

(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:

☑ 76-99%

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

We actively engage with our key suppliers by setting environmental performance standards related to resource efficiency, carbon emissions reduction, and sustainable sourcing. Specifically, we collaborate closely with suppliers of cardboard, plastic film, resin, and ink to ensure that they are adopting practices that align with our sustainability goals. The effect of this engagement has been a notable reduction in the carbon footprint of our supply chain, particularly through increased use of low carbon materials and improved energy efficiency in production processes. Additionally, these collaborations have encouraged our suppliers to adopt more sustainable practices, contributing to broader environmental improvements across the value chain.

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

Select from:

☑ Yes, please specify the environmental requirement :adaptation the climate change

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

Select from:

☑ Yes

Water

(5.11.7.2) Action driven by supplier engagement

Select from:

☑ Adaptation to climate change

(5.11.7.3) Type and details of engagement

Capacity building

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

☑ Support suppliers to set their own environmental commitments across their operations

Information collection

☑ Collect environmental risk and opportunity information at least annually from suppliers

☑ Collect targets information at least annually from suppliers

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

Innovation and collaboration

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

☑ Incentivize collaborative sustainable water management in river basins

☑ Run a campaign to encourage innovation to reduce environmental impacts on products and services

(5.11.7.4) Upstream value chain coverage

Select all that apply

☑ Tier 1 suppliers

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

Select from:

☑ 76-99%

(5.11.7.7) % tier 1 suppliers with substantive impacts and/or dependencies related to this environmental issue covered by engagement

Select from:

☑ 76-99%

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

We actively engage with our key suppliers by setting environmental performance standards related to resource efficiency, carbon emissions reduction, and sustainable sourcing. Specifically, we collaborate closely with suppliers of cardboard, plastic film, resin, and ink to ensure that they are adopting practices that align with our sustainability goals. The effect of this engagement has been a notable reduction in the carbon footprint of our supply chain, particularly through increased use of low carbon materials and improved energy efficiency in production processes. Additionally, these collaborations have encouraged our suppliers to adopt more sustainable practices, contributing to broader environmental improvements across the value chain.

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

Select from:

☑ Yes, please specify the environmental requirement :adaptation the climate change

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

Select from:

☑ Yes

[Add row]

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

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☑ Other value chain stakeholder, please specify :Universities

(5.11.9.2) Type and details of engagement

Innovation and collaboration

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

(5.11.9.3) % of stakeholder type engaged

Select from:

☑ 1-25%

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

☑ 100%

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

We collaborate with universities through joint R&D projects, such as the TÜBİTAK 1832 program on recyclable high-barrier packaging. These partnerships allow us to integrate academic expertise into innovation while systematically accounting for the full Scope 3 emissions of our R&D activities and related business travel. The scope of engagement covers both product development and methodological improvements in carbon footprint calculations across the value chain.

(5.11.9.6) Effect of engagement and measures of success

Through these engagements, we have improved the accuracy of our emissions accounting, expanded our ability to measure Scope 3 emissions, and developed low-carbon packaging alternatives that reduce environmental impact. This has strengthened our transition plan, enhanced our credibility with stakeholders, and positioned us as a preferred supplier for global FMCG clients seeking innovative, low-emission packaging solutions.

Water

(5.11.9.1) Type of stakeholder

Select from:

☑ Investors and shareholders

(5.11.9.2) Type and details of engagement

Innovation and collaboration

☑ Run a campaign to encourage innovation to reduce environmental impacts

(5.11.9.3) % of stakeholder type engaged

Select from:

☑ 76-99%

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

Our engagement with investors and shareholders on water issues is based on the growing recognition that water scarcity and regulatory changes present both financial risks and strategic opportunities. Investors expect transparent disclosure on how our operations and supply chain manage water dependencies, particularly in relation to recycled cardboard sourcing and local water availability. To address this, we provide regular updates on our water efficiency targets, such as the 30% water reduction goal by 2030, and report on capital expenditures for greywater reuse, rainwater harvesting, and reverse osmosis systems. These disclosures ensure that investors understand how water management is embedded in our financial and strategic planning.

(5.11.9.6) Effect of engagement and measures of success

As a result of this engagement, investors gain greater confidence in our ability to mitigate water-related risks while improving operational efficiency. By demonstrating measurable progress in water reuse and efficiency projects, we highlight cost savings and reduced exposure to regulatory or supply chain disruptions. This has led to improved investor trust, alignment with ESG-focused investment criteria, and increased attractiveness for sustainability-linked financing. It also ensures that our long-term growth strategy is perceived as resilient to water-related challenges, strengthening our competitive positioning in the market.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☑ Investors and shareholders

(5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Share information on environmental initiatives, progress and achievements

(5.11.9.3) % of stakeholder type engaged

Select from:

☑ 51-75%

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

☑ 100%

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

Our engagement with investors and shareholders is driven by the increasing expectation for transparency on environmental performance and alignment with global climate goals. Investors require clear information on how our sustainability initiatives, including R&D projects, renewable energy investments, and resource efficiency measures, support long-term value creation. For this reason, we regularly disclose progress on our environmental initiatives through sustainability reports, CDP responses, and investor presentations. This engagement covers the majority of our investor base, ensuring that environmental risks, opportunities, and budget allocations for innovation are communicated in line with financial reporting practices.

(5.11.9.6) Effect of engagement and measures of success

Through this engagement, investors gain confidence in the company's ability to manage environmental risks and to capitalize on opportunities such as sustainable product innovation and access to green finance. By sharing detailed information on progress and achievements — including our emissions reduction trajectory, water efficiency initiatives, and allocation of funds to R&D — we have strengthened investor trust and positioned ourselves as a reliable partner in the transition to a low-carbon economy. This has contributed to improved dialogue with shareholders, enhanced access to sustainability-linked financing, and greater alignment between our strategic growth plans and investor expectations.

[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

For climate change, water, plastics, and biodiversity, our organization applies the financial control consolidation approach in line with the GHG Protocol Corporate Standard. This method is consistent with our financial consolidation practices, where all entities over which we have the ability to direct financial and operating policies are fully included in our environmental boundary. We selected this approach because it ensures that environmental impacts such as greenhouse gas emissions, water usage, waste and plastics management, and biodiversity-related aspects are reported in a manner consistent with the entities consolidated in our financial statements. This alignment allows us to maintain transparency and comparability across financial and environmental disclosures, and to manage impacts where we have clear authority over decision-making and resource allocation. In accordance with the Science-Based Targets Network (SBTN) guidance, we apply the same consolidation approach across all environmental topics to ensure consistency in boundary-setting and when developing or updating science-based targets.

Water

(6.1.1) Consolidation approach used

Select from:

☑ Financial control

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

For climate change, water, plastics, and biodiversity, our organization applies the financial control consolidation approach in line with the GHG Protocol Corporate Standard. This method is consistent with our financial consolidation practices, where all entities over which we have the ability to direct financial and operating policies are fully included in our environmental boundary. We selected this approach because it ensures that environmental impacts such as greenhouse gas emissions, water usage, waste and plastics management, and biodiversity-related aspects are reported in a manner consistent with the entities consolidated in our

financial statements. This alignment allows us to maintain transparency and comparability across financial and environmental disclosures, and to manage impacts where we have clear authority over decision-making and resource allocation. In accordance with the Science-Based Targets Network (SBTN) guidance, we apply the same consolidation approach across all environmental topics to ensure consistency in boundary-setting and when developing or updating science-based targets.

Plastics

(6.1.1) Consolidation approach used

Select from:

☑ Financial control

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

For climate change, water, plastics, and biodiversity, our organization applies the financial control consolidation approach in line with the GHG Protocol Corporate Standard. This method is consistent with our financial consolidation practices, where all entities over which we have the ability to direct financial and operating policies are fully included in our environmental boundary. We selected this approach because it ensures that environmental impacts such as greenhouse gas emissions, water usage, waste and plastics management, and biodiversity-related aspects are reported in a manner consistent with the entities consolidated in our financial statements. This alignment allows us to maintain transparency and comparability across financial and environmental disclosures, and to manage impacts where we have clear authority over decision-making and resource allocation. In accordance with the Science-Based Targets Network (SBTN) guidance, we apply the same consolidation approach across all environmental topics to ensure consistency in boundary-setting and when developing or updating science-based targets.

Biodiversity

(6.1.1) Consolidation approach used

Select from:

☑ Financial control

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

For climate change, water, plastics, and biodiversity, our organization applies the financial control consolidation approach in line with the GHG Protocol Corporate Standard. This method is consistent with our financial consolidation practices, where all entities over which we have the ability to direct financial and operating policies are fully included in our environmental boundary. We selected this approach because it ensures that environmental impacts such as greenhouse gas emissions, water usage, waste and plastics management, and biodiversity-related aspects are reported in a manner consistent with the entities consolidated in our financial statements. This alignment allows us to maintain transparency and comparability across financial and environmental disclosures, and to manage impacts where we have clear authority over decision-making and resource allocation. In accordance with the Science-Based Targets Network (SBTN) guidance, we apply the same consolidation approach across all environmental topics to ensure consistency in boundary-setting and when developing or updating science-based targets.

[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?

(7.1.1.1) Has there been a structural change?

Select all that apply
☑ Yes, an acquisition

(7.1.1.2) Name of organization(s) acquired, divested from, or merged with

Atlas Ofset

(7.1.1.3) Details of structural change(s), including completion dates

Atlas Ofset was acquired and fully consolidated under Duran Doğan's financial control in 2024. As a result, Atlas Ofset has been included in the organizational boundary for the first time in this reporting year. This structural change expanded the reporting boundary compared to the 2020 base year, which previously included only the Hadımköy, Ömerli 1, and Ömerli 2 facilities. From 2024 onwards, Scope 1 and Scope 2 emissions from Atlas Ofset are accounted for in our GHG inventory, ensuring consistency with our financial consolidation approach.
[Fixed row]

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

(7.1.2.1) Change(s) in methodology, boundary, and/or reporting year definition?

Select all that apply

☑ Yes, a change in boundary

(7.1.2.2) Details of methodology, boundary, and/or reporting year definition change(s)

In 2024, the organizational boundary was expanded to include Atlas Ofset, which was acquired and consolidated under Duran Doğan's financial control during the reporting year. As a result, Scope 1 and Scope 2 emissions from Atlas Ofset are now included in the GHG inventory for the first time. This change represents an adjustment in the reporting boundary compared to previous disclosures, which only covered the Hadımköy, Ömerli 1, and Ömerli 2 facilities. No changes were made to the reporting year definition or emissions calculation methodology.
[Fixed row]

(7.1.3) Have your organization's base year emissions and past years' emissions been recalculated as a result of any changes or errors reported in 7.1.1 and/or 7.1.2?

(7.1.3.1) Base year recalculation

Select from:

☑ Yes

(7.1.3.2) Scope(s) recalculated

Select all that apply

☑ Scope 1

☑ Scope 2, location-based

(7.1.3.3) Base year emissions recalculation policy, including significance threshold

Our base year (2020) emissions were recalculated to include Atlas Ofset, which was acquired in 2024 and consolidated within our reporting boundary under the financial control approach. Atlas Ofset's 2020 Scope 1 and Scope 2 emissions (160.43 tCO_2e and 276.75 tCO_2e respectively) were added to the previously reported base year values, resulting in revised base year totals of 1,212.43 tCO_2e for Scope 1 and 4,860.75 tCO_2e for Scope 2 (location-based). As no I-RECs were

purchased in 2020, no market-based Scope 2 emissions were applicable. Duran Doğan applies a 5% significance threshold for recalculation. The inclusion of Atlas Ofset exceeded this threshold, therefore a base year adjustment was required. This ensures full comparability between the base year and reporting year emissions.

(7.1.3.4) Past years' recalculation

Select from:
☑ 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
☑ ISO 14064-1
☑ The Greenhouse Gas Protocol: Scope 2 Guidance
☑ The Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Standard
☑ 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories
☑ The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)
☑ Defra Environmental Reporting Guidelines: Including streamlined energy and carbon reporting guidance, 2019

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

(7.3.1) Scope 2, location-based

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

(7.3.2) Scope 2, market-based

Select from:
☑ We are reporting a Scope 2, market-based figure

(7.3.3) Comment

We are reporting both a Scope 2, location-based figure and a Scope 2, market-based figure. For the location-based approach, grid average emission factors for Turkey were applied to all electricity consumption across our operations. For the market-based approach, we accounted for our purchase of International Renewable Energy Certificates (I-RECs), which covered 8,593,059 kWh, corresponding to approximately 82% of our total electricity consumption in 2024. At the Hadımköy facility, 100% of electricity consumption (8,482,059 kWh) was matched with I-RECs, resulting in zero market-based emissions. At Atlas Ofset, 111,000 kWh was covered by I-RECs, avoiding ~49 tCO_2e compared to the location-based calculation. No I-RECs were used at Ömerli 1 and Ömerli 2 facilities. These I-RECs meet the market boundary criteria of the GHG Protocol Scope 2 Guidance, as they were sourced within the same market where the electricity was consumed. The use of I-RECs allows us to report reduced market-based emissions and demonstrates our progress towards renewable energy procurement. This dual reporting approach ensures alignment with the GHG Protocol Scope 2 Guidance and provides a transparent view of our performance under both methodologies.
[Fixed row]

(7.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1, Scope 2 or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure?

Select from:
☑ No

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

Scope 1

(7.5.1) Base year end

12/30/2020

(7.5.2) Base year emissions (metric tons CO2e)

1212.43

(7.5.3) Methodological details

Scope 1 emissions were calculated in accordance with the GHG Protocol Corporate Standard and the IPCC 2006 Guidelines for National Greenhouse Gas Inventories. Activity data (natural gas, diesel, LPG, gasoline) was collected directly from invoices, meter readings, and internal monitoring systems, covering the full calendar year. Emissions of CO_2, CH_4, and N_2O were calculated separately using IPCC Tier 1 emission factors and, where available, updated national factors for

Turkey. All emissions were converted into CO_2-equivalent values using 100-year GWPs from the IPCC AR6 (2021). This methodology ensures transparency, consistency, and comparability with international best practice.

Scope 2 (location-based)

(7.5.1) Base year end

12/30/2020

(7.5.2) Base year emissions (metric tons CO2e)

4860.75

(7.5.3) Methodological details

Scope 2 emissions were calculated using the location-based method, in line with the GHG Protocol Scope 2 Guidance. The Turkey national grid average emission factor ($kgCO_2e/kWh$) was applied to all electricity consumption across facilities. Electricity consumption data was obtained from utility invoices and internal monitoring systems, covering the full reporting year. CH_4 and N_2O emissions were included in the applied emission factor. This approach provides a complete and consistent representation of emissions associated with purchased electricity.

Scope 2 (market-based)

(7.5.1) Base year end

12/30/2020

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

No market-based Scope 2 emissions were reported for the base year, as no contractual instruments (such as I-RECs, PPAs, or supplier-specific emission factors) were in place in 2020. Therefore, only the location-based method was applicable. In line with the GHG Protocol Scope 2 Guidance, the location-based result has been reported as a proxy to ensure like-for-like comparability across reporting years.

Scope 3 category 1: Purchased goods and services

(7.5.1) Base year end

12/30/2020

(7.5.2) Base year emissions (metric tons CO2e)

34043

(7.5.3) Methodological details

Emissions from purchased goods and services were calculated using a life cycle assessment (LCA) approach. Activity data for key raw materials (cardboard, inks, plastic films, adhesives) was obtained from procurement records and supplier declarations. Emission factors were sourced from Ecoinvent and DEFRA databases, in line with the IPCC 2006 Guidelines. The methodology covered cradle-to-gate impacts of raw materials.

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

(7.5.1) Base year end

12/30/2020

(7.5.2) Base year emissions (metric tons CO2e)

221

(7.5.3) Methodological details

Emissions were calculated for transmission and distribution (T&D) losses and other upstream energy activities. Activity data was derived from total electricity consumption figures, with the difference between medium-voltage and production-mix emission factors applied. Emission factors were sourced from DEFRA.

Scope 3 category 4: Upstream transportation and distribution

(7.5.1) Base year end

12/30/2020

(7.5.2) Base year emissions (metric tons CO2e)

2599

(7.5.3) Methodological details

Emissions were calculated for the transport of purchased goods from suppliers to Duran Doğa facilities. Activity data was based on logistics contracts, distances travelled and shipment volumes. DEFRA emission factors were applied depending on transport mode (road, sea, air).

Scope 3 category 5: Waste generated in operations

(7.5.1) Base year end

12/30/2020

(7.5.2) Base year emissions (metric tons CO2e)

135

(7.5.3) Methodological details

Emissions from waste disposal and wastewater treatment were calculated using waste management contractor data (volumes and treatment methods). Emission factors were obtained from DEFRA.

Scope 3 category 6: Business travel

(7.5.1) Base year end

12/30/2020

(7.5.2) Base year emissions (metric tons CO2e)

9.0

(7.5.3) Methodological details

Emissions from business travel were calculated based on air travel activity data, including number of trips, distance between airports, and passenger class. Company records and invoices were used as data sources. DEFRA emission factors were applied for different flight types.

Scope 3 category 7: Employee commuting

(7.5.1) Base year end

12/30/2020

(7.5.2) Base year emissions (metric tons CO2e)

207

(7.5.3) Methodological details

Emissions from employee commuting were calculated using activity data from annual transportation service contracts (routes, distances, working days). Outsourced transportation services by bus and minibus were included. Emission factors were obtained from DEFRA databases.

Scope 3 category 9: Downstream transportation and distribution

(7.5.1) Base year end

12/30/2020

(7.5.2) Base year emissions (metric tons CO2e)

2599

(7.5.3) Methodological details

Emissions from distribution of sold products to customers were calculated based on shipping distances, transport modes (road, sea, air), and product weights. Data was obtained from logistics records and customer distribution information. DEFRA emission factors were applied.

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

(7.5.1) Base year end

12/30/2020

(7.5.2) Base year emissions (metric tons CO2e)

2660

(7.5.3) Methodological details

GHG protocol was followed for calculations. IPCC, DEFRA and Ecoinvent sources were used in the calculations. Emissions from the end-of-life treatment of packaging products were calculated using sales volumes and global statistics on cardboard packaging disposal routes (landfilling, recycling, incineration). Emission factors were sourced from DEFRA, aligned with IPCC 2006 Guidelines.
[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)

966.05

(7.6.3) Methodological details

Scope 1 emissions are calculated in accordance with the GHG Protocol Corporate Standard and the IPCC 2006 Guidelines for National Greenhouse Gas Inventories. Our organizational boundary is defined using the financial control approach, covering all facilities consolidated in Duran Doğan’s financial reporting. Within this boundary, Scope 1 emissions arise from stationary and mobile combustion of fuels under our control, including natural gas for process and heating needs, diesel and gasoline for company-owned vehicles, and LPG used in production activities. Activity data for each fuel type is obtained from invoices, meter readings, and internal monitoring systems covering the full reporting year. Emissions of carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O) are calculated separately using IPCC Tier 1 emission factors and, where available, updated national emission factors for Turkey. All gases are then converted into CO_2-equivalent values using the 100-year Global Warming Potentials (GWPs) from the IPCC AR6 (2021), ensuring consistency with the latest international scientific guidance. The Scope 1 inventory is independently verified under ISO 14064-1, with reasonable assurance on completeness and accuracy. This methodology provides transparency, consistency, and comparability in line with the GHG Protocol and CDP reporting requirements.
[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)

4609.05

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

810.92

(7.7.4) Methodological details

Scope 2 emissions are calculated in line with the GHG Protocol Corporate Standard and the GHG Protocol Scope 2 Guidance. Our organizational boundary is defined using the financial control approach, covering all facilities consolidated in Duran Doğan's financial reporting. For the location-based method, emissions were calculated by applying the national grid average emission factor for Turkey (0.442 kgCO_2e/kWh), which includes CO_2, CH_4, and N_2O, to all purchased electricity consumption across our facilities. For the market-based method, emissions were calculated using contractual instruments in the form of International Renewable Energy Certificates (I-RECs). At facilities where I-RECs were purchased and retired, the corresponding electricity consumption was reported as zero emissions, in accordance with the market boundary criteria set out in the GHG Protocol Scope 2 Guidance. At facilities without I-RECs, the location-based emission factor was applied. Electricity consumption data was collected from invoices, supplier statements, and internal monitoring systems for the full reporting period. All emissions are reported as gross values, with no deductions for offsets or other instruments beyond the application of I-RECs under the market-based method. This methodology ensures transparent, consistent, and comparable reporting of Scope 2 emissions in line with CDP requirements.
[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)

30471

(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

(7.8.5) Please explain

Emissions cover cradle-to-gate impacts of purchased raw materials (e.g., cartonboard/paper, inks, plastic films, adhesives) and subcontracted services that are material to Duran Doğan's products. Activity data (annual purchase volumes by material grade and supplier) were taken from procurement and ERP records for the full reporting year. We applied the average-data method under the GHG Protocol Scope 3 Standard, multiplying purchased quantities by industry-average life-cycle emission factors from Ecoinvent (latest available release). All gases were converted to CO_2e using IPCC AR6 (100-year) GWPs. Where multiple material grades existed, factors were mass-weighted across grades; services were mapped to appropriate process proxies (e.g., printing/pre-press services) consistent with cradle-to-gate boundaries. Internal QA/QC reconciled volumes to audited purchase totals; no supplier-specific primary LCI data or EPDs were available this year.

Capital goods

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

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

0

(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

(7.8.5) Please explain

Capital goods were assessed in line with the GHG Protocol Scope 3 Standard. The average-data method was applied, considering potential purchases of machinery, equipment, and facility investments during the reporting year. Procurement records and financial accounts were reviewed to identify relevant capital expenditure. In the reporting year, no significant capital goods purchases (e.g., new production lines, large-scale equipment, or building investments) occurred beyond routine replacements, which are accounted as operating expenses. As a result, the calculation returned 0 tCO_2e. Emission factors from Ecoinvent/DEFRA databases were identified for capital goods categories to ensure consistency, but not applied due to absence of qualifying purchases. This approach ensures full transparency and consistency with the cradle-to-gate boundary defined by the GHG Protocol. Supplier-specific primary data was not available.

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)

528

(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

(7.8.5) Please explain

Fuel- and energy-related activities (not included in Scope 1 or 2) were calculated in accordance with the GHG Protocol Scope 3 Standard using the average-data method. This category includes Well-to-Tank (WTT) emissions of fuels consumed under Scope 1 (e.g., natural gas, diesel, LPG) and transmission and distribution (T&D) losses associated with purchased electricity reported in Scope 2. Activity data for fuel and electricity consumption was obtained from Duran Doğan's internal

monitoring systems and supplier invoices. Upstream emission factors were sourced exclusively from the DEFRA 2025 Greenhouse Gas Reporting Conversion Factors, covering cradle-to-gate processes such as fuel extraction, processing, and transportation, as well as grid distribution losses. Combustion-related emissions are excluded from this category, as they are already reported under Scope 1 and Scope 2. The average-data method was selected due to the availability of accurate consumption records and the robustness of DEFRA 2025 factors. Supplier-specific data was not available.

Upstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

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

2803

(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

(7.8.5) Please explain

Emissions from upstream transportation and distribution were calculated in line with the GHG Protocol Scope 3 Standard using the average-data method combined with the distance-based method. This category covers the transport of purchased raw materials (e.g., cardboard, plastic film, ink, glue) from suppliers to Duran Doğan's production facilities. The calculation was based on primary procurement data for the weight of transported raw materials (kg) and the distance between suppliers and the facility (km). Transport mode (e.g., road, sea, air) and vehicle type were identified for each transport activity. Corresponding DEFRA 2025 emission factors were applied to reflect mode- and vehicle-specific intensity values. Emissions were calculated by multiplying the transported weight (tonnes) by the distance (km) and the relevant emission factor for each mode. Supplier-specific transport emissions data was not available.

Waste generated in operations

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

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

26

(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

(7.8.5) Please explain

Emissions from waste generated in operations were calculated in accordance with the GHG Protocol Scope 3 Standard using the waste-type-specific method. This category covers both solid waste generated during production (e.g., cardboard, plastic, food waste) and process wastewater.No primary supplier or downstream partner data was available. Waste data (mass per type) was obtained from Duran Doğan's internal waste tracking system and aligned with national reporting requirements through waste codes. The associated emissions were estimated using waste- and treatment-specific emission factors (incineration, landfill, recycling, and wastewater treatment), sourced from the DEFRA 2025 Greenhouse Gas Reporting: Conversion Factors. The calculation considers the end-of-life emissions based on the treatment method applied, ensuring comprehensive coverage of all waste types generated in operations. The waste-type-specific method was chosen due to its ability to provide more accurate estimates based on the specific treatment methods applied to different waste streams. This method ensures that all significant emissions sources related to waste treatment are accounted for.

Business travel

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

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

14

(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

(7.8.5) Please explain

Emissions from business travel were calculated in line with the GHG Protocol Scope 3 Standard using the distance-based method. Business travels with company or rental vehicles are already reported under Scope 1 (mobile combustion); therefore, this category only covers air travel. Air travel activity data (number of trips, distances, ticket classes) was obtained from Duran Doğan's internal travel records. The total distance traveled was multiplied by DEFRA 2025 emission factors specific to domestic and international flights, ensuring coverage of well-to-wheel (WTW) emissions. No business travel by rail or rental vehicles was included due to data limitations, and visitor/customer travel was excluded as it is outside of the organizational boundary. Supplier-derived data was not used in the reporting year.

Employee commuting

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

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

1194

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Distance-based method

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

100

(7.8.5) Please explain

Emissions from employee commuting were calculated using the distance-based method, in line with the GHG Protocol Scope 3 guidance. Primary data on commuting routes, distances, and vehicle types was obtained directly from the outsourced transportation service provider, ensuring full coverage and accuracy. The number of commuting routes, vehicle occupancy, and total kilometers traveled were combined with DEFRA 2025 emission factors to estimate total emissions. The methodology applies vehicle-specific emission factors and passenger load assumptions provided by DEFRA. The boundary includes all employees regularly commuting to Duran Doğan facilities via contracted shuttle services. Using supplier-provided data ensured that 100% of emissions were calculated based on value chain partner information, maximizing data reliability and transparency.

Upstream leased assets

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

We have assessed this category in line with the GHG Protocol Scope 3 Standard. The company does not lease any upstream assets (e.g. vehicles, buildings, or equipment) that would result in GHG emissions outside of Scope 1 and 2. Therefore, this category is not applicable and is considered not relevant (<0.1% of total Scope 3 emissions).

Downstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

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

2648

(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

(7.8.5) Please explain

Emissions from the transportation of sold products to distribution points and customers have been calculated under this category. The distance-based method was applied, consistent with DEFRA 2025 guidance. The calculation considered the weight of the sold products, transportation distance, and the mode of transport (road, air, sea), with emission factors selected according to the vehicle and transport type. Primary activity data on outbound logistics was obtained from Duran Doğan's internal sales and distribution records, while secondary emission factors were sourced from DEFRA (2025). The boundary covers all downstream transportation activities managed by third parties for the delivery of products to customers. As supplier-specific primary data was not available.

Processing of sold products

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

Our packaging products are delivered to customers as finished goods, ready for direct use. There is no additional processing required by customers before use, and therefore no additional emissions occur in this category. Based on this boundary, the category is not relevant (<0.1% of total Scope 3 emissions.

Use of sold products

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

Our products (packaging materials) do not generate significant GHG emissions during the use phase, as they do not involve energy, fuel, or water consumption. As such, this category does not represent a source of relevant emissions (<0.1% of total Scope 3 emissions).

End of life treatment of sold products

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

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

4458

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average product method

☑ Waste-type-specific method

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

0

(7.8.5) Please explain

Emissions from the end-of-life treatment of sold packaging products were calculated in line with DEFRA 2025 emission factors. The calculation considered the total volume of products sold during the reporting year and applied global waste treatment statistics for cardboard and packaging materials. End-of-life scenarios included landfill, recycling, and incineration, weighted according to average treatment distributions for packaging waste. Primary data on sales volumes was sourced from Duran Doğan's internal production and sales records, while waste treatment emission factors were taken from DEFRA (2025). As no supplier- or customer-specific disposal data was available.

Downstream leased assets

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

We do not lease any downstream assets (such as buildings, vehicles, or equipment) to third parties. Therefore, there are no associated emissions under this category. It is considered not relevant (<0.1% of total Scope 3 emissions).

Franchises

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

Our company does not operate under a franchise business model. Hence, there are no associated emissions from this category.

Investments

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

We are not a financial services company and do not manage investment portfolios. Therefore, this category is not relevant to our operations.

Other (upstream)

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

No other upstream emission sources beyond those already disclosed have been identified. Accordingly, this category is not relevant.

Other (downstream)

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

No other downstream emission sources beyond those already disclosed have been identified. Accordingly, this category is not relevant.
[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

	Verification/assurance status
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

Duran Doğan_GHG Doğrulama Beyanı_rev.01 en-tr.pdf

(7.9.1.5) Page/section reference

1 page

(7.9.1.6) Relevant standard

Select from:
☑ ISO14064-1

(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

Duran Doğan_GHG Doğrulama Beyanı_rev.01 en-tr.pdf

(7.9.2.6) Page/ section reference

1 page

(7.9.2.7) Relevant standard

Select from:

☑ ISO14064-1

(7.9.2.8) Proportion of reported emissions verified (%)

100

Row 2

(7.9.2.1) Scope 2 approach

Select from:

☑ Scope 2 market-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

Duran Doğan_GHG Doğrulama Beyanı_rev.01 en-tr.pdf

(7.9.2.6) Page/ section reference

1 page

(7.9.2.7) Relevant standard

Select from:
☑ ISO14064-1

(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: Business travel
☑ Scope 3: Employee commuting
☑ Scope 3: Purchased goods and services
☑ Scope 3: Waste generated in operations
☑ Scope 3: End-of-life treatment of sold products
☑ 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:
☑ Reasonable assurance

(7.9.3.5) Attach the statement

Duran Doğan_GHG Doğrulama Beyanı_rev.01 en-tr.pdf

(7.9.3.6) Page/section reference

1 page

(7.9.3.7) Relevant standard

Select from:
☑ ISO14064-1

(7.9.3.8) Proportion of reported emissions verified (%)

100
[Add row]

(7.10) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Select from:
☑ Decreased

(7.10.1) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.

Change in renewable energy consumption

(7.10.1.1) Change in emissions (metric tons CO2e)

2798

(7.10.1.2) Direction of change in emissions

Select from:
☑ Decreased

(7.10.1.3) Emissions value (percentage)

60

(7.10.1.4) Please explain calculation

The decrease in emissions is primarily due to the purchase of renewable electricity through I-REC certificates in 2024. The baseline gross Scope 1+2 emissions for 2023 were 4,653 tCO_2e. The avoided emissions from renewable electricity procurement were 2,798 tCO_2e. The calculation is as follows: (–2,798 ÷ 4,653) × 100 = –

60% This reflects the replacement of grid electricity with renewable energy, which directly reduced market-based Scope 2 emissions. The activity was fully accounted for under Scope 2 (market-based) in line with the GHG Protocol Corporate Standard.

Other emissions reduction activities

(7.10.1.1) Change in emissions (metric tons CO2e)

206

(7.10.1.2) Direction of change in emissions

Select from:

☑ Decreased

(7.10.1.3) Emissions value (percentage)

4

(7.10.1.4) Please explain calculation

A decrease in emissions was recorded due to general operational efficiency improvements and optimization actions implemented across facilities. The total reduction attributed to these activities was 206 tCO_2e, compared to the baseline of 4,653 tCO_2e. The calculation is as follows: (–206 ÷ 4,653) × 100 = –4% These reductions represent ongoing efficiency measures that lowered fossil fuel consumption and electricity demand. The reductions were calculated using the national grid emission factor for Scope 2 electricity and IPCC 2006 default factors for Scope 1 fuels, in line with the GHG Protocol Corporate Standard.

Acquisitions

(7.10.1.1) Change in emissions (metric tons CO2e)

128

(7.10.1.2) Direction of change in emissions

Select from:

☑ Increased

(7.10.1.3) Emissions value (percentage)

3

(7.10.1.4) Please explain calculation

An increase in emissions occurred due to the inclusion of Atlas Ofset within the organizational boundary in 2024. The additional emissions from Atlas Ofset operations were 128 tCO_2e. The calculation is as follows: (128 ÷ 4,653) × 100 = +3% This increase reflects the expanded reporting boundary rather than an operational performance change. The additional emissions were incorporated in accordance with the operational control approach and included under Scope 1 and Scope 2 calculations for the reporting year.
[Fixed row]

(7.10.2) Are your emissions performance calculations in 7.10 and 7.10.1 based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?

Select from:
☑ Market-based

(7.13) Is biogenic carbon pertaining to your direct operations relevant to your current CDP climate change disclosure?

Select from:
☑ No

(7.15) Does your organization break down its Scope 1 emissions by greenhouse gas type?

Select from:
☑ Yes

(7.15.1) Break down your total gross global Scope 1 emissions by greenhouse gas type and provide the source of each used global warming potential (GWP).

Row 1

(7.15.1.1) Greenhouse gas

Select from:
☑ CO2

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

788.27

(7.15.1.3) GWP Reference

Select from:
☑ IPCC Sixth Assessment Report (AR6 - 100 year)

Row 2

(7.15.1.1) Greenhouse gas

Select from:
☑ CH4

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

1.22

(7.15.1.3) GWP Reference

Select from:
☑ IPCC Sixth Assessment Report (AR6 - 100 year)

Row 3

(7.15.1.1) Greenhouse gas

Select from:
☑ N2O

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

3.76

(7.15.1.3) 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 CO2e)

172.8

(7.15.1.3) GWP Reference

Select from:
☑ IPCC Sixth Assessment Report (AR6 - 100 year)
[Add row]

(7.16) Break down your total gross global Scope 1 and 2 emissions by country/area.

	Scope 1 emissions (metric tons CO2e)	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Turkey	*966.05*	*4609.05*	*810.92*

[Fixed row]

(7.17) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.

Select all that apply

☑ By facility

☑ By activity

(7.17.2) Break down your total gross global Scope 1 emissions by business facility.

Row 1

(7.17.2.1) Facility

Hadımköy Fabrika

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

598.34

(7.17.2.3) Latitude

41.142083

(7.17.2.4) Longitude

28.641207

Row 2

(7.17.2.1) Facility

Ömerli 1 Tesisi

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

340.75

(7.17.2.3) Latitude

41.114864

(7.17.2.4) Longitude

28.634859

Row 3

(7.17.2.1) Facility

Ömerli 2 Tesisi

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

0

(7.17.2.3) Latitude

41.112179

(7.17.2.4) Longitude

28.640376

Row 4

(7.17.2.1) Facility

Atlas Ofset

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

26.97

(7.17.2.3) Latitude

41.187077

(7.17.2.4) Longitude

28.603095
[Add row]

(7.17.3) Break down your total gross global Scope 1 emissions by business activity.

	Activity	Scope 1 emissions (metric tons CO2e)
Row 1	*Stationary Combustion*	*645.57*
Row 2	*Mobile Combustion*	*147.64*
Row 3	*Fugitive Emissions*	*172.84*

[Add row]

(7.18) Do you include emissions pertaining to your business activity(ies) in your direct operations as part of your global gross Scope 1 figure?

Select from:
☑ Yes

(7.18.1) Select the form(s) in which you are reporting your agricultural/forestry emissions.

Select from:
☑ Total emissions

(7.18.2) Report the Scope 1 emissions pertaining to your business activity(ies) and explain any exclusions. If applicable, disaggregate your agricultural/forestry by GHG emissions category.

Row 1

(7.18.2.1) Activity

Select from:
☑ Processing/Manufacturing

(7.18.2.3) Emissions (metric tons CO2e)

966

(7.18.2.4) Methodology

Select all that apply
☑ Default emissions factor
☑ Region-specific emissions factors

(7.18.2.5) Please explain

Scope 1 emissions for processing/manufacturing activities in 2024 amounted to 966 tCO_2e. These emissions primarily arise from natural gas and diesel consumption in production facilities (Hadımköy, Ömerli 1, and Atlas Ofset). Activity data was collected from internal fuel consumption records (invoices and meter readings). Calculations applied the 2006 IPCC Guidelines for National Greenhouse Gas Inventories and nationally published emission factors for natural gas and diesel, ensuring alignment with region-specific conditions. Emissions from fugitive sources or agricultural/forestry activities are not material to Duran Doğan's operations and were therefore excluded. The reported value represents 100% of Scope 1 emissions from direct operations in the reporting year, ensuring completeness and consistency with the GHG Protocol Corporate Standard.
[Add row]

(7.20) Indicate which gross global Scope 2 emissions breakdowns you are able to provide.

Select all that apply
☑ By facility

(7.20.2) Break down your total gross global Scope 2 emissions by business facility.

	Facility	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Row 1	*Hadımköy Fabrika*	*3749.07*	*0*
Row 2	*Ömerli 1 Tesisi*	*568.25*	*568.25*
Row 3	*Ömerli 2 Tesisi*	*141.49*	*141.49*
Row 4	*Atlas Ofset*	*150.24*	*101*

[Add 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)

966

(7.22.2) Scope 2, location-based emissions (metric tons CO2e)

4609

(7.22.3) Scope 2, market-based emissions (metric tons CO2e)

811

(7.22.4) Please explain

The consolidated accounting group includes Duran Doğan Basım ve Ambalaj A.Ş. and its consolidated facilities (Hadımköy, Ömerli 1, Ömerli 2, and Atlas Ofset). Scope 1 emissions arise from stationary and mobile combustion of fuels, while Scope 2 emissions are based on purchased electricity, reported as both location-based and market-based. Emissions were calculated in line with the GHG Protocol Corporate Standard, using activity data from fuel and electricity consumption records and applying IPCC 2006 Guidelines and nationally published emission factors. This ensures completeness and alignment between financial and organizational boundaries.

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

(7.22.3) Scope 2, market-based emissions (metric tons CO2e)

0

(7.22.4) Please explain

No additional entities outside of the consolidated accounting group were included in this disclosure. Duran Doğan does not have joint ventures, associates, or unconsolidated subsidiaries with material GHG emissions. Therefore, Scope 1 and Scope 2 emissions for this row are reported as zero.
[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:
☑ Not relevant as we do not have any subsidiaries

(7.29) What percentage of your total operational spend in the reporting year was on energy?

Select from:
☑ More than 5% but less than or equal to 10%

(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:* ☑ No

[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

0

(7.30.1.3) MWh from non-renewable sources

3829.67

(7.30.1.4) Total (renewable + non-renewable) MWh

3829.67

Consumption of purchased or acquired electricity

(7.30.1.1) Heating value

Select from:
☑ LHV (lower heating value)

(7.30.1.2) MWh from renewable sources

8594.76

(7.30.1.3) MWh from non-renewable sources

1832.96

(7.30.1.4) Total (renewable + non-renewable) MWh

10427.72

Total energy consumption

(7.30.1.1) Heating value

Select from:
☑ LHV (lower heating value)

(7.30.1.2) MWh from renewable sources

8594.76

(7.30.1.3) MWh from non-renewable sources

5662.63

(7.30.1.4) Total (renewable + non-renewable) MWh

14257.39
[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:* ☑ No
Consumption of fuel for the generation of heat	*Select from:* ☑ Yes
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) Heating value

Select from:
☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

0

Other biomass

(7.30.7.1) Heating value

Select from:
☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

0

Other renewable fuels (e.g. renewable hydrogen)

(7.30.7.1) Heating value

Select from:
☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

0

Coal

(7.30.7.1) Heating value

Select from:
☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

0

Oil

(7.30.7.1) Heating value

Select from:

☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

559.33

(7.30.7.8) Comment

“Diesel and gasoline consumption was used for both stationary combustion (generators/boilers) and mobile sources (company fleet). Activity data was collected from procurement records and internal monitoring. Conversion to MWh was performed using DEFRA 2025 emission factors and national lower heating values.

Gas

(7.30.7.1) Heating value

Select from:

☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

3270.34

(7.30.7.8) Comment

Natural gas consumption was used for stationary combustion in production facilities. Activity data was obtained from invoices and meter readings. Conversion to MWh was carried out using national lower heating values.

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

(7.30.7.1) Heating value

Select from:

☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.8) Comment

No other renewable or non-renewable fuels were consumed in the reporting year. LHV selected for consistency.

Total fuel

(7.30.7.1) Heating value

Select from:
☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

3829.67

(7.30.7.8) Comment

Total fuel consumption (3,829.67 MWh) matches the figure reported in 7.30.1 for 'Consumption of fuel (excluding feedstock)'. The reported values cover 100% of fuel consumption within the organizational boundary.
[Fixed row]

(7.30.14) Provide details on the electricity, heat, steam, and/or cooling amounts that were accounted for at a zero or near-zero emission factor in the market-based Scope 2 figure reported in 7.7.

Row 1

(7.30.14.1) Country/area

Select from:

☑ Turkey

(7.30.14.2) Sourcing method

Select from:

☑ Physical power purchase agreement (physical PPA) with a grid-connected generator

(7.30.14.3) Energy carrier

Select from:

☑ Electricity

(7.30.14.4) Low-carbon technology type

Select from:

☑ Hydropower (capacity unknown)

(7.30.14.5) Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)

713.06

(7.30.14.6) Tracking instrument used

Select from:

☑ I-REC

(7.30.14.7) Country/area of origin (generation) of the low-carbon energy or energy attribute

Select from:

☑ Turkey

(7.30.14.8) Are you able to report the commissioning or re-powering year of the energy generation facility?

Select from:

☑ Yes

(7.30.14.9) Commissioning year of the energy generation facility (e.g. date of first commercial operation or repowering)

2015

(7.30.14.10) Comment

This volume corresponds to 713 MWh of renewable electricity sourced under a physical power purchase agreement and certified with I-REC. The I-REC certificates were redeemed by Aydem Yenilenebilir Enerji A.Ş. on behalf of Duran Doğan for the reporting period, ensuring the exclusive claim of renewable attributes. The certificates originate from Kemer Hydroelectric Power Plant (Turkey), as documented in the redemption statement.

Row 2

(7.30.14.1) Country/area

Select from:

☑ Turkey

(7.30.14.2) Sourcing method

Select from:

☑ Physical power purchase agreement (physical PPA) with a grid-connected generator

(7.30.14.3) Energy carrier

Select from:

☑ Electricity

(7.30.14.4) Low-carbon technology type

Select from:

☑ Hydropower (capacity unknown)

(7.30.14.5) Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)

4367

(7.30.14.6) Tracking instrument used

Select from:

☑ I-REC

(7.30.14.7) Country/area of origin (generation) of the low-carbon energy or energy attribute

Select from:

☑ Turkey

(7.30.14.8) Are you able to report the commissioning or re-powering year of the energy generation facility?

Select from:

☑ Yes

(7.30.14.9) Commissioning year of the energy generation facility (e.g. date of first commercial operation or repowering)

1958

(7.30.14.10) Comment

This volume corresponds to 4,367 MWh of renewable electricity purchased under a physical PPA and tracked with I-REC. The redemption statement confirms the allocation of certificates to Duran Doğan, issued by Foton, linked to the Kemer Hydroelectric Power Plant in Turkey. Carbon offset attributes are included and cannot be further traded.

Row 3

(7.30.14.1) Country/area

Select from:

☑ Turkey

(7.30.14.2) Sourcing method

Select from:

☑ Physical power purchase agreement (physical PPA) with a grid-connected generator

(7.30.14.3) Energy carrier

Select from:

☑ Electricity

(7.30.14.4) Low-carbon technology type

Select from:

☑ Hydropower (capacity unknown)

(7.30.14.5) Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)

3402

(7.30.14.6) Tracking instrument used

Select from:

☑ I-REC

(7.30.14.7) Country/area of origin (generation) of the low-carbon energy or energy attribute

Select from:

☑ Turkey

(7.30.14.8) Are you able to report the commissioning or re-powering year of the energy generation facility?

Select from:

☑ Yes

(7.30.14.9) Commissioning year of the energy generation facility (e.g. date of first commercial operation or repowering)

2015

(7.30.14.10) Comment

This volume corresponds to 3,402 MWh of renewable electricity matched with I-REC certificates redeemed for Duran Doğan. The I-REC redemption ensures the exclusive claim of renewable energy use, verified through the Evident registry. Certificates originate from Turkish hydropower facilities and cover the relevant production period.

Row 4

(7.30.14.1) Country/area

Select from:

☑ Turkey

(7.30.14.2) Sourcing method

Select from:

☑ Physical power purchase agreement (physical PPA) with a grid-connected generator

(7.30.14.3) Energy carrier

Select from:

☑ Electricity

(7.30.14.4) Low-carbon technology type

Select from:

☑ Hydropower (capacity unknown)

(7.30.14.5) Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)

111

(7.30.14.6) Tracking instrument used

Select from:

☑ I-REC

(7.30.14.7) Country/area of origin (generation) of the low-carbon energy or energy attribute

Select from:
☑ Turkey

(7.30.14.8) Are you able to report the commissioning or re-powering year of the energy generation facility?

Select from:
☑ Yes

(7.30.14.9) Commissioning year of the energy generation facility (e.g. date of first commercial operation or repowering)

2015

(7.30.14.10) Comment

This volume corresponds to 111 MWh of renewable electricity consumed by Atlas Ofset, matched with redeemed I-REC certificates from Turkish hydropower. Redemption statements confirm exclusive ownership of environmental attributes, ensuring no double counting or resale of associated offsets.
[Add row]

(7.30.16) Provide a breakdown by country/area of your electricity/heat/steam/cooling consumption in the reporting year.

Turkey

(7.30.16.1) Consumption of purchased electricity (MWh)

10426.02

(7.30.16.2) Consumption of self-generated electricity (MWh)

1.7

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

10427.72
[Fixed row]

(7.45) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

Row 1

(7.45.1) Intensity figure

9e-7

(7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

1777

(7.45.3) Metric denominator

Select from:
☑ unit total revenue

(7.45.4) Metric denominator: Unit total

200301284

(7.45.5) Scope 2 figure used

Select from:

☑ Market-based

(7.45.6) % change from previous year

58.5

(7.45.7) Direction of change

Select from:

☑ Decreased

(7.45.8) Reasons for change

Select all that apply

☑ Change in renewable energy consumption

(7.45.9) Please explain

The decrease in emissions intensity is primarily attributed to a significant increase in renewable electricity consumption. In 2024, Duran Doğan sourced 82% of its total electricity demand through I-REC certified renewable energy purchases and onsite solar generation, compared to lower levels in 2023. This transition from grid electricity to renewable sources directly reduced Scope 2 market-based emissions, resulting in a combined Scope 1 and 2 total of 1,777 tCO_2e, despite stable production activities. The revenue boundary is consistent with the organizational boundary applied for GHG reporting, ensuring alignment of numerator and denominator. The reported intensity figure of 0.0000009 tCO_2e per unit revenue reflects both operational efficiency and the effectiveness of renewable energy sourcing as a key decarbonization lever.
[Add row]

(7.52) Provide any additional climate-related metrics relevant to your business.

	Metric numerator
Row 1	

[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:

☑ Yes, and this target has been approved by the Science Based Targets initiative

(7.53.1.3) Science Based Targets initiative official validation letter

SBT Commmitment.pdf

(7.53.1.4) Target ambition

Select from:

☑ 1.5°C aligned

(7.53.1.5) Date target was set

02/02/2023

(7.53.1.6) Target coverage

Select from:

☑ Organization-wide

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

☑ Methane (CH4)

☑ Nitrous oxide (N2O)

☑ Carbon dioxide (CO2)

☑ Perfluorocarbons (PFCs)

☑ Hydrofluorocarbons (HFCs)

☑ Sulphur hexafluoride (SF6)

☑ Nitrogen trifluoride (NF3)

(7.53.1.8) Scopes

Select all that apply

☑ Scope 1

☑ Scope 2

(7.53.1.9) Scope 2 accounting method

Select from:

☑ Location-based

(7.53.1.11) End date of base year

12/30/2020

(7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO2e)

1052

(7.53.1.13) Base year Scope 2 emissions covered by target (metric tons CO2e)

4594

(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)

5646.000

(7.53.1.33) Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1

100

(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

12/30/2030

(7.53.1.55) Targeted reduction from base year (%)

42

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

3274.680

(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)

966.05

(7.53.1.58) Scope 2 emissions in reporting year covered by target (metric tons CO2e)

4609.05

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

5575.100

(7.53.1.78) Land-related emissions covered by target

Select from:

☑ Yes, it covers land-related emissions only (e.g. FLAG SBT)

(7.53.1.79) % of target achieved relative to base year

2.99

(7.53.1.80) Target status in reporting year

Select from:

☑ Underway

(7.53.1.82) Explain target coverage and identify any exclusions

Organization type: SME. Sector: Containers and Packaging. Company temperature alignment: 1.5°C. Business Ambition for 1.5°C commitment. Target language: This target was approved using a streamlined target validation route exclusive to small and medium-sized enterprises (SMEs). https://sciencebasedtargets.org/faqs-

for-smes/ DURAN DOGAN BASIM VE AMBALAJ A.S. commits to reduce Scope 1 and Scope 2 GHG emissions 42% by 2030 from a 2020 base year, and to measure and reduce its Scope 3 emissions. No relevant Scope 1 or Scope 2 emissions are excluded from the target boundary.

(7.53.1.83) Target objective

The objective is to align the company's decarbonization pathway with the 1.5°C global warming limit. By reducing absolute Scope 1 and Scope 2 emissions 42% by 2030 compared to a 2020 base year, the company supports global efforts to mitigate climate change while enhancing operational sustainability and resilience. The target also ensures long-term compliance with global customer and regulatory expectations, strengthening competitiveness in international markets.

(7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

Duran Doğan Basım ve Ambalaj A.Ş. has established a decarbonization plan aligned with its SBTi-approved 1.5°C target. The plan focuses on three pillars: (i) renewable electricity, (ii) energy efficiency across production, and (iii) fleet electrification. In the reporting year, 82% of electricity demand was covered with renewable sources through I-REC certificates (8.59 GWh) and rooftop solar (1.7 MWh). Efficiency improvements stabilized Scope 1 emissions, while vehicle electrification investments are underway. On a location-based basis, 2024 Scope 1 and 2 emissions were 5,575 tCO_2e (3% below 2020). On a market-based basis, emissions dropped to 1,777 tCO_2e (69% reduction). Progress is reviewed annually by the Sustainability Committee and reported to the Board, ensuring governance alignment. Improvements are expected to continue linearly until 2030.

(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, and this target has been approved by the Science Based Targets initiative

(7.53.2.3) Science Based Targets initiative official validation letter

SBT Commmitment.pdf

(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

☑ Methane (CH4)

☑ Nitrous oxide (N2O)

☑ Carbon dioxide (CO2)

☑ Perfluorocarbons (PFCs)

☑ Hydrofluorocarbons (HFCs)

☑ Nitrogen trifluoride (NF3)

☑ Sulphur hexafluoride (SF6)

(7.53.2.8) Scopes

Select all that apply

☑ Scope 1

(7.53.2.11) Intensity metric

Select from:

☑ Metric tons CO2e per unit revenue

(7.53.2.12) End date of base year

12/30/2020

(7.53.2.13) Intensity figure in base year for Scope 1

0.0000035

(7.53.2.33) Intensity figure in base year for all selected Scopes

0.0000035000

(7.53.2.34) % of total base year emissions in Scope 1 covered by this Scope 1 intensity figure

100

(7.53.2.54) % of total base year emissions in all selected Scopes covered by this intensity figure

100

(7.53.2.55) End date of target

12/30/2030

(7.53.2.56) Targeted reduction from base year (%)

60

(7.53.2.57) Intensity figure at end date of target for all selected Scopes

0.0000014000

(7.53.2.58) % change anticipated in absolute Scope 1+2 emissions

-18.5

(7.53.2.60) Intensity figure in reporting year for Scope 1

5e-7

(7.53.2.80) Intensity figure in reporting year for all selected Scopes

0.0000005000

(7.53.2.81) Land-related emissions covered by target

Select from:

☑ Yes, it covers land-related emissions only (e.g. FLAG SBT)

(7.53.2.82) % of target achieved relative to base year

142.86

(7.53.2.83) Target status in reporting year

Select from:

☑ Achieved

(7.53.2.85) Explain target coverage and identify any exclusions

Organization type: SME. Sector: Containers and Packaging. Company temperature alignment: 1.5°C. This target applies organization-wide and covers all Scope 1 emissions. No relevant exclusions. The target boundary also covers land-related emissions in line with the SBTi FLAG requirements.

(7.53.2.86) Target objective

The objective of this target is to align the company's energy efficiency strategy with the 1.5°C pathway, in line with its SBTi-approved targets. By reducing energy intensity across production processes, the company aims to decouple business growth from emissions growth, reduce operational costs, and strengthen competitiveness in global packaging markets.

(7.53.2.88) Target derived using a sectoral decarbonization approach

Select from:

☑ Yes

(7.53.2.89) List the emissions reduction initiatives which contributed most to achieving this target

The target was achieved ahead of schedule through a structured energy efficiency program focusing on Scope 1 emissions. Key measures included process optimization, enhanced monitoring of stationary combustion systems, and efficiency upgrades in production lines such as transition to LED lighting and installation of variable speed drives. Additional measures included systematic maintenance to prevent compressor leakages and improved heat recovery applications. These initiatives collectively reduced direct fuel consumption and improved overall operational efficiency. As a result, Scope 1 emissions intensity declined by more than 60% compared to the 2020 baseline, enabling the company to fully meet its SBTi-approved target before 2030. In addition, fuel efficiency measures and electrification pilots were initiated, complementing energy efficiency projects to ensure long-term sustainability of Scope 1 reductions.
[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

☑ Net-zero targets

(7.54.1) Provide details of your targets to increase or maintain low-carbon energy consumption or production.

Row 1

(7.54.1.1) Target reference number

Select from:

☑ Low 1

(7.54.1.2) Date target was set

08/31/2024

(7.54.1.3) Target coverage

Select from:

☑ Organization-wide

(7.54.1.4) Target type: energy carrier

Select from:

☑ Electricity

(7.54.1.5) Target type: activity

Select from:

☑ Consumption

(7.54.1.6) Target type: energy source

Select from:

☑ Renewable energy source(s) only

(7.54.1.7) End date of base year

12/30/2020

(7.54.1.8) Consumption or production of selected energy carrier in base year (MWh)

1248

(7.54.1.9) % share of low-carbon or renewable energy in base year

2

(7.54.1.10) End date of target

12/30/2030

(7.54.1.11) % share of low-carbon or renewable energy at end date of target

95

(7.54.1.12) % share of low-carbon or renewable energy in reporting year

82

(7.54.1.13) % of target achieved relative to base year

86.02

(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 – This renewable electricity target directly supports the absolute Scope 1 and 2 emissions reduction target disclosed in 7.53.1, by lowering market-based Scope 2 emissions through renewable electricity procurement.

(7.54.1.17) Is this target part of an overarching initiative?

Select all that apply

☑ Science Based Targets initiative

(7.54.1.19) Explain target coverage and identify any exclusions

The target applies organization-wide and covers 100% of electricity consumption, including both purchased electricity and self-generated renewable electricity (onsite solar PV). No exclusions are applied, and the target boundary is fully aligned with the company's organizational boundary for Scope 2 accounting.

(7.54.1.20) Target objective

The strategic objective of this target is to transition the company's electricity consumption to renewable sources, reducing exposure to regulatory and market risks associated with fossil-based electricity and directly contributing to achieving the SBTi-approved absolute Scope 1 and 2 emissions reduction target. The target also

ensures long-term alignment with customer expectations, international climate commitments, and compliance with emerging sustainability disclosure frameworks such as TSRS, and CDP.

(7.54.1.21) Plan for achieving target, and progress made to the end of the reporting year

In the reporting year, the company procured 8.59 GWh of renewable electricity through I-REC certificates and generated 1.7 MWh via rooftop solar panels at its Hadımköy facility. This enabled renewable electricity to cover 82% of total consumption, representing 86% progress towards the 2030 target of 95% renewable electricity. The pathway to 2030 foresees a linear increase in renewable sourcing, supported by expanded onsite solar capacity, continued purchase of I-RECs, and evaluation of additional long-term power purchase agreements (PPAs). Progress is monitored annually through CDP and TSRS-aligned disclosures, ensuring transparency and continuous evaluation of renewable energy sourcing opportunities. These efforts position the company firmly on track to achieve and potentially exceed its 2030 renewable electricity target.
[Add row]

(7.54.3) Provide details of your net-zero target(s).

Row 1

(7.54.3.1) Target reference number

Select from:
☑ NZ1

(7.54.3.2) Date target was set

08/31/2024

(7.54.3.3) Target Coverage

Select from:
☑ Organization-wide

(7.54.3.4) Targets linked to this net zero target

Select all that apply
☑ Abs1

☑ Abs2
☑ Int1
☑ Low1

(7.54.3.5) End date of target for achieving net zero

12/30/2050

(7.54.3.6) Is this a science-based target?

Select from:
☑ Yes, we consider this a science-based target, and we have committed to seek validation of this target by the Science Based Targets initiative in the next two years

(7.54.3.8) Scopes

Select all that apply
☑ Scope 1
☑ Scope 2
☑ Scope 3

(7.54.3.9) Greenhouse gases covered by target

Select all that apply
☑ Methane (CH4)
☑ Nitrous oxide (N2O)
☑ Carbon dioxide (CO2)
☑ Perfluorocarbons (PFCs)
☑ Hydrofluorocarbons (HFCs)
☑ Sulphur hexafluoride (SF6)
☑ Nitrogen trifluoride (NF3)

(7.54.3.10) Explain target coverage and identify any exclusions

This net-zero target covers 100% of Duran Doğan's organization-wide activities, including Scope 1, Scope 2, and relevant Scope 3 categories (purchased goods and services, upstream and downstream transportation, and end-of-life treatment). There are no exclusions. The target has been aligned with the Paris Agreement and

the SBTi Net Zero Standard, and it is linked to our near-term absolute reduction targets (-42% Scope 1+2 by 2030 vs. 2020). Residual emissions will only be those that cannot be technically eliminated.

(7.54.3.11) Target objective

The objective of this net-zero target is to ensure full alignment with global climate goals and Turkey's transition to a low-carbon economy. By 2050, we commit to achieving net-zero emissions across our value chain through a combination of energy efficiency, renewable energy (onsite solar and I-RECs), process innovation (film-free metallization, PET recycling), sustainable sourcing (100% FSC/PEFC-certified or recycled carton), and electrification. This target is embedded into our corporate strategy, financial planning, and investment decisions to mitigate exposure to ETS/CBAM costs and strengthen competitiveness in export markets.

(7.54.3.12) Do you intend to neutralize any residual emissions with permanent carbon removals at the end of the target?

Select from:

☑ Yes

(7.54.3.13) Do you plan to mitigate emissions beyond your value chain?

Select from:

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

(7.54.3.14) Do you intend to purchase and cancel carbon credits for neutralization and/or beyond value chain mitigation?

Select all that apply

☑ Yes, we plan to purchase and cancel carbon credits for neutralization at the end of the target

(7.54.3.15) Planned milestones and/or near-term investments for neutralization at the end of the target

Duran Doğan's primary focus is to reduce emissions at source through energy efficiency, renewable energy adoption (onsite solar PV and I-REC purchases), and circular economy initiatives such as PET film recycling. Neutralization measures will be considered only for residual emissions by 2050. At present, no specific carbon removal projects have been implemented, but the company plans to evaluate options such as nature-based solutions and high-quality removal credits in the medium term. In the near term (2025–2030), focus will remain on reduction measures including efficiency upgrades, renewable energy expansion, and supplier engagement to reduce Scope 3 impacts. Evaluation of neutralization pathways will begin closer to 2030, aligned with SBTi recommendations. Preparatory steps include monitoring developments in carbon removal technologies and standards, and using shadow carbon pricing in investment planning to ensure readiness for future neutralization.

(7.54.3.17) Target status in reporting year

Select from:

☑ New

(7.54.3.19) Process for reviewing target

Duran Doğan reviews its emission reduction and net-zero targets annually through the Sustainability Committee, which includes senior management and is chaired by executives reporting to the Board. Progress is assessed against verified Scope 1 and 2 inventories and ongoing Scope 3 mapping efforts. Results are integrated into financial and operational planning, with updates provided to the Board twice a year. External assurance of GHG inventories and monitoring of regulatory and market developments, such as Turkey's upcoming ETS and EU CBAM, are also part of the review process. Adjustments to targets are made if material changes occur in organizational boundaries, methodologies, or regulations.
[Add row]

(7.55) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.

Select from:
☑ Yes

(7.55.1) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e
Under investigation	*4*	*`Numeric input*
To be implemented	*1*	*1260*
Implementation commenced	*1*	*2100*
Implemented	*2*	*3094*
Not to be implemented	*1*	*`Numeric input*

[Fixed row]

(7.55.2) Provide details on the initiatives implemented in the reporting year in the table below.

Row 1

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in production processes
☑ Process optimization

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

206

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply
☑ Scope 1
☑ Scope 2 (location-based)

(7.55.2.4) Voluntary/Mandatory

Select from:
☑ Voluntary

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

0

(7.55.2.8) Estimated lifetime of the initiative

Select from:
☑ 3-5 years

(7.55.2.9) Comment

This initiative includes operational optimization, process fine-tuning, and energy management actions across facilities, leading to lower fossil fuel use and reduced electricity demand. Emission reductions were calculated using IPCC 2006 factors for fuels and national grid factor for Scope 2 electricity.

Row 2

(7.55.2.1) Initiative category & Initiative type

Low-carbon energy consumption

☑ Hydropower (capacity unknown)

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

2798

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☑ Scope 2 (location-based)

☑ Scope 2 (market-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

☑ Voluntary

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☑ 11-15 years

(7.55.2.9) Comment

Renewable electricity consumption was increased through the purchase of I-REC certificates equivalent to 8.59 GWh and onsite rooftop solar PV generation of 1.7 MWh. These initiatives significantly reduced market-based Scope 2 emissions and contributed to progress towards the company's decarbonization pathway.

Row 3

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in production processes
☑ Waste heat recovery

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

90

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply
☑ Scope 1

(7.55.2.4) Voluntary/Mandatory

Select from:
☑ Voluntary

(7.55.2.8) Estimated lifetime of the initiative

Select from:
☑ 6-10 years

(7.55.2.9) Comment

In 2024, a heat recovery system for compressors was commissioned at the Hadımköy facility. Additionally, control valves were repaired and optimized. Within four months, approximately 46,000 m³ of natural gas savings were achieved, equivalent to ~90 tCO_2e annualized Scope 1 emission reductions and ~880,000 TL cost savings. This initiative strengthens energy efficiency, reduces fossil fuel dependency, and supports climate-related cost resilience.
[Add row]

(7.55.3) What methods do you use to drive investment in emissions reduction activities?

Row 1

(7.55.3.1) Method

Select from:

☑ Dedicated budget for low-carbon product R&D

(7.55.3.2) Comment

In 2024, we allocated ₺20.7 million to our R&D program, focusing on innovative low-carbon packaging solutions. Key projects included TÜBİTAK-funded cellulose-based recyclable barrier materials and the EBRD-supported PET film recycling line. These initiatives directly reduce Scope 3 emissions of our customers while creating new circular raw materials.

Row 2

(7.55.3.1) Method

Select from:

☑ Dedicated budget for energy efficiency

(7.55.3.2) Comment

We dedicated ₺1.3 million in 2024 to energy efficiency and operational optimization projects. Investments covered LED lighting, insulation, heat exchanger system, and process optimization in production facilities. These measures reduced direct fossil fuel use (Scope 1) and grid electricity demand (Scope 2), supporting our SBTi-approved emission reduction targets.

Row 3

(7.55.3.1) Method

Select from:

☑ Dedicated budget for other emissions reduction activities

(7.55.3.2) Comment

We allocate a dedicated budget to procure renewable electricity and invest in onsite solar generation. In 2024, we sourced 8.59 GWh of renewable electricity through I-REC certificates and installed a rooftop solar PV system at our Hadımköy facility (1.7 MWh annual generation capacity). These investments directly reduce our Scope 2 (market-based) emissions, align with our SBTi-approved targets, and contribute to long-term cost savings and regulatory compliance under CBAM and ETS-related requirements.
[Add row]

(7.67) Do you implement agriculture or forest management practices on your own land with a climate change mitigation and/or adaptation benefit?

Select from:
☑ No

(7.68) Do you encourage your suppliers to undertake any agricultural or forest management practices with climate change mitigation and/or adaptation benefits?

Select from:
☑ No

(7.68.3) Why do you not encourage your suppliers to undertake any agricultural/forest management practices with climate change mitigation and/or adaptation benefits?

(7.68.3.1) Primary reason

Select from:
☑ We plan to introduce a process in the next two years

(7.68.3.2) Please explain

In the upcoming years such system will be implemented
[Fixed row]

(7.74) Do you classify any of your existing goods and/or services as low-carbon products?

Select from:
☑ Yes

(7.74.1) Provide details of your products and/or services that you classify as low-carbon products.

Row 1

(7.74.1.1) Level of aggregation

Select from:
☑ Product or service

(7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:
☑ The EU Taxonomy for environmentally sustainable economic activities

(7.74.1.3) Type of product(s) or service(s)

Other
☑ Other, please specify :High-barrier recyclable packaging

(7.74.1.4) Description of product(s) or service(s)

This low-carbon packaging solution was developed through a TÜBİTAK 1832-supported R&D project (2021–2025) titled "Development of Recyclable High-Barrier Paper and Board Packaging to Replace Plastic Packaging". The innovation eliminates PET laminates by applying a transfer metallization process, where the PET film is recovered before final dispatch and recycled back into PET granules. The final packaging remains mono-material cardboard, fully recyclable, with high barrier properties (against moisture, oxygen, and oil). This dual benefit reduces virgin PET demand and avoids landfill at end-of-life.

(7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

Select from:

☑ Yes

(7.74.1.6) Methodology used to calculate avoided emissions

Select from:

☑ Other, please specify :Based on avoided virgin PET production and end-of-life landfill emissions.

(7.74.1.7) Life cycle stage(s) covered for the low-carbon product(s) or services(s)

Select from:

☑ Cradle-to-cradle/closed loop production

(7.74.1.8) Functional unit used

1 kg PET laminate avoided (replaced with recyclable cardboard solution)

(7.74.1.9) Reference product/service or baseline scenario used

Conventional PET-laminated packaging

(7.74.1.10) Life cycle stage(s) covered for the reference product/service or baseline scenario

Select from:

☑ Cradle-to-grave

(7.74.1.12) Explain your calculation of avoided emissions, including any assumptions

Avoided emissions are calculated by comparing the life-cycle emissions of conventional PET-laminated packaging versus the new recyclable cardboard solution. The methodology accounts for: • Virgin PET production avoided (≈1,500 tons of PET annually recovered in closed loop). • End-of-life impact difference: cardboard recycling vs. PET-laminated landfill/incineration. Assumptions: IPCC 2006 factors for plastics, Ecoinvent database for cardboard recycling, and TÜBİTAK project data on material flows.

(7.74.1.13) Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year

0

[Add row]

(7.79) Has your organization retired any project-based carbon credits within the reporting year?

Select from:

☑ No

C9. Environmental performance - Water security

(9.1) Are there any exclusions from your disclosure of water-related data?

Select from:
☑ No

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

Water withdrawals – total volumes

(9.2.1) % of sites/facilities/operations

Select from:
☑ 100%

(9.2.2) Frequency of measurement

Select from:
☑ Monthly

(9.2.3) Method of measurement

We measure water withdrawals using flow meters.

(9.2.4) Please explain

All facilities are equipped with flow meters, and total water withdrawals are recorded and reported monthly at the facility and corporate level.

Water withdrawals – volumes by source

(9.2.1) % of sites/facilities/operations

Select from:
☑ 100%

(9.2.2) Frequency of measurement

Select from:
☑ Monthly

(9.2.3) Method of measurement

We measure water withdrawals by soruce using flow meters.

(9.2.4) Please explain

Withdrawals are sourced solely from non-renewable groundwater. Volumes by source are monitored through flow meters and consolidated monthly.

Water withdrawals quality

(9.2.1) % of sites/facilities/operations

Select from:
☑ 100%

(9.2.2) Frequency of measurement

Select from:
☑ Monthly

(9.2.3) Method of measurement

We measure water quality using third party sourced laboratuary

(9.2.4) Please explain

Since process water is not directly used in production, quality parameters are not critical. Monitoring is carried out by accredited third-party laboratories at defined intervals to ensure compliance with local regulations.

Water discharges – total volumes

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Monthly

(9.2.3) Method of measurement

We measure water discharge using flow meters.

(9.2.4) Please explain

All wastewater is measured using flow meters and reported monthly. Data is verified against discharge permits and third-party wastewater treatment operator reports.

Water discharges – volumes by destination

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Monthly

(9.2.3) Method of measurement

We measure water discharge per destiantion using flow meters.

(9.2.4) Please explain

All wastewater is discharged via third-party municipal channels. Volumes are measured through flow meters and confirmed in monthly reports.

Water discharges – volumes by treatment method

(9.2.1) % of sites/facilities/operations

Select from:
☑ 100%

(9.2.2) Frequency of measurement

Select from:
☑ Monthly

(9.2.3) Method of measurement

We measure water discharge by treatment method using flow meters.

(9.2.4) Please explain

Wastewater undergoes pre-treatment before being discharged to third-party municipal infrastructure. Volumes are tracked monthly to ensure compliance with regulatory requirements.

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:

☑ Monthly

(9.2.3) Method of measurement

We measure discharge quality using third party sourced laboratuary.

(9.2.4) Please explain

Effluent quality parameters (COD, BOD, TSS) are monitored regularly by accredited laboratories. Results are reported to authorities in line with local regulations.

Water discharge quality – emissions to water (nitrates, phosphates, pesticides, and/or other priority substances)

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Monthly

(9.2.3) Method of measurement

We measure discharge quality using third party sourced laboratuary.

(9.2.4) Please explain

COD is measured as a representative priority parameter. Nitrates and phosphates are not significant in operations; hence COD is used as the reported metric.

Water discharge quality – temperature

(9.2.1) % of sites/facilities/operations

Select from:
☑ 100%

(9.2.2) Frequency of measurement

Select from:
☑ Monthly

(9.2.3) Method of measurement

We measure temperature via termometer in place.

(9.2.4) Please explain

Temperature of discharges is measured in situ with thermometers to monitor compliance with legal discharge limits.

Water consumption – total volume

(9.2.1) % of sites/facilities/operations

Select from:
☑ 100%

(9.2.2) Frequency of measurement

Select from:
☑ Monthly

(9.2.3) Method of measurement

We measure consumption via calculation.

(9.2.4) Please explain

Water consumption is minimal and primarily for domestic purposes. Consumption is calculated by subtracting discharge volumes from withdrawals.

Water recycled/reused

(9.2.1) % of sites/facilities/operations

Select from:
☑ 100%

(9.2.2) Frequency of measurement

Select from:
☑ Monthly

(9.2.3) Method of measurement

We measure recycled/reuse water using flow meters.

(9.2.4) Please explain

Recycling and reuse volumes are measured by flow meters and reported monthly. Efficiency projects continue to improve recycling performance.

The provision of fully-functioning, safely managed WASH services to all workers

(9.2.1) % of sites/facilities/operations

Select from:
☑ 100%

(9.2.2) Frequency of measurement

Select from:
☑ Monthly

(9.2.3) Method of measurement

WASH servives figures are generally measured as a calculation.

(9.2.4) Please explain

All facilities provide access to safe drinking water, sanitation, and hygiene (WASH) services. Availability and compliance are monitored monthly, aligned with local health and safety standards.
[Fixed row]

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

Total withdrawals

(9.2.2.1) Volume (megaliters/year)

13.62

(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:
☑ Mergers and acquisitions

(9.2.2.4) Five-year forecast

Select from:
☑ About the same

(9.2.2.5) Primary reason for forecast

Select from:

☑ Increase/decrease in business activity

(9.2.2.6) Please explain

We integrate WRI Aqueduct outputs into our risk management process annually and link water stress results directly with our investment decisions. Compared to the previous year (10.22 ML), withdrawals increased mainly due to the inclusion of our new Atlas Ofset facility, which expanded our operational boundary. Additionally, higher production activity at Hadımköy and Ömerli sites contributed to increased well water use. Going forward, withdrawals are expected to remain about the same, as efficiency measures (perlator replacement, greywater reuse) will offset production-driven increases.

Total discharges

(9.2.2.1) Volume (megaliters/year)

10.05

(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:

☑ Mergers and acquisitions

(9.2.2.4) Five-year forecast

Select from:

☑ About the same

(9.2.2.5) Primary reason for forecast

Select from:

☑ Increase/decrease in business activity

(9.2.2.6) Please explain

Compared to the previous year (9.20 ML), discharges increased as a result of higher water withdrawals and boundary expansion with Atlas Ofset. Increased production volumes at existing sites also contributed to higher discharges. Over the next five years, discharges are expected to remain stable, supported by improved recycling and reduced freshwater intake.

Total consumption

(9.2.2.1) Volume (megaliters/year)

3.57

(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:

☑ Mergers and acquisitions

(9.2.2.4) Five-year forecast

Select from:

☑ About the same

(9.2.2.5) Primary reason for forecast

Select from:

☑ Increase/decrease in business activity

(9.2.2.6) Please explain

Total consumption is calculated as withdrawals minus discharges and reflects water incorporated into processes, minor process losses, and domestic use. Compared to the previous year (1.02 ML), consumption increased due to the expanded organizational boundary with the inclusion of Atlas Ofset. Future consumption levels are expected to remain relatively stable, with changes linked to variations in business activity.
[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)

13.62

(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:
☑ Mergers and acquisitions

(9.2.4.5) Five-year forecast

Select from:
☑ About the same

(9.2.4.6) Primary reason for forecast

Select from:

☑ Increase/decrease in business activity

(9.2.4.7) % of total withdrawals that are withdrawn from areas with water stress

100.00

(9.2.4.8) Identification tool

Select all that apply

☑ WRI Aqueduct

(9.2.4.9) Please explain

We integrate WRI Aqueduct outputs into our risk management process annually and link water stress results directly with our investment decisions. Efficiency projects (greywater reuse, faucet aerators, and process optimizations) are prioritized at sites flagged as 'High Baseline Water Stress'. All of Duran Doğan's water withdrawals are sourced from wells located in the Marmara basin, which is identified as a water-stressed region according to the WRI Aqueduct tool (Baseline Water Stress: High). In the reporting year, withdrawals increased to 13.62 ML compared to 10.22 ML in the previous year, primarily due to the inclusion of the Atlas Ofset facility into the organizational boundary and higher production activity. The increase does not indicate a structural change in water dependency, as the company continues to rely on the same source. Looking ahead, withdrawals are expected to remain about the same over the next five years, with fluctuations linked to business activity levels. Efficiency investments, such as grey water reuse systems and ongoing monitoring, are expected to mitigate future dependency, but the region will remain categorized as water-stressed.
[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

We do not withdraw water from surface water sources, including rivers, lakes, wetlands, or rainwater.

Brackish surface water/Seawater

(9.2.7.1) Relevance

Select from:
☑ Not relevant

(9.2.7.5) Please explain

We do not withdraw brackish water or seawater.

Groundwater – renewable

(9.2.7.1) Relevance

Select from:
☑ Not relevant

(9.2.7.5) Please explain

No renewable groundwater is used for withdrawals.

Groundwater – non-renewable

(9.2.7.1) Relevance

Select from:
☑ Relevant

(9.2.7.2) Volume (megaliters/year)

13.62

(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:

☑ Mergers and acquisitions

(9.2.7.5) Please explain

Our only source of water withdrawal is non-renewable groundwater from wells. In 2024, withdrawals increased to 13.62 ML from 10.22 ML in the previous year, mainly due to the inclusion of the Atlas Ofset facility within the reporting boundary. Although annual fluctuations may occur depending on operational levels, no structural change in water sourcing has taken place. Efficiency investments, such as grey water reuse projects, are expected to mitigate withdrawal levels in the coming years.

Produced/Entrained water

(9.2.7.1) Relevance

Select from:

☑ Not relevant

(9.2.7.5) Please explain

There is no produced or entrained water at our facilities.

Third party sources

(9.2.7.1) Relevance

Select from:

☑ Not relevant

(9.2.7.5) Please explain

We do not purchase or withdraw water from third-party 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

All wastewater is discharged via third-party wastewater channels; there are no direct discharges to rivers, lakes, wetlands, or other surface waters.

Brackish surface water/seawater

(9.2.8.1) Relevance

Select from:
☑ Not relevant

(9.2.8.5) Please explain

No wastewater is discharged to brackish or seawater sources.

Groundwater

(9.2.8.1) Relevance

Select from:
☑ Not relevant

(9.2.8.5) Please explain

No discharges to groundwater occur; all wastewater is directed to third-party channels.

Third-party destinations

(9.2.8.1) Relevance

Select from:
☑ Relevant

(9.2.8.2) Volume (megaliters/year)

10.05

(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:
☑ Mergers and acquisitions

(9.2.8.5) Please explain

All wastewater is discharged via licensed third-party municipal wastewater channels; there are no direct discharges to rivers, lakes, wetlands, brackish water, seawater, or groundwater. In 2024, discharges increased to 10.05 ML from 9.20 ML in the previous year, primarily due to the inclusion of the Atlas Ofset facility within the reporting boundary and higher production activity. Calculations are verified by assurance.
[Fixed row]

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

Tertiary treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Not relevant

(9.2.9.6) Please explain

We only apply pre-treatment before discharge; no tertiary treatment is in place.

Secondary treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Not relevant

(9.2.9.6) Please explain

We only apply pre-treatment before discharge; no secondary treatment is in place.

Primary treatment only

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Relevant

(9.2.9.2) Volume (megaliters/year)

10.05

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☑ Higher

(9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☑ Mergers and acquisitions

(9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

☑ 100%

(9.2.9.6) Please explain

All wastewater is pre-treated before being discharged via licensed third-party channels. In 2024, treated volume increased to 10.05 ML from 9.20 ML in the previous year, primarily due to the inclusion of the Atlas Ofset facility within the reporting boundary and higher production activity. Inspections and measurements are conducted in line with local regulations, and results are verified by assurance. No secondary or tertiary treatment is applied. COD reduction is embedded in our corporate KPI structure and tracked quarterly by the Sustainability Committee, ensuring that water pollution targets are integrated into top management performance monitoring.

Discharge to the natural environment without treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Not relevant

(9.2.9.6) Please explain

All wastewater is managed via pre-treatment and third-party discharge; no direct discharges to the natural environment occur.

Discharge to a third party without treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:
☑ Not relevant

(9.2.9.6) Please explain

Wastewater is not discharged untreated; all discharges undergo pre-treatment before being directed to third parties.

Other

(9.2.9.1) Relevance of treatment level to discharge

Select from:
☑ Not relevant

(9.2.9.6) Please explain

No other treatment methods are applied.
[Fixed row]

(9.2.10) Provide details of your organization’s emissions of nitrates, phosphates, pesticides, and other priority substances to water in the reporting year.

(9.2.10.1) Emissions to water in the reporting year (metric tons)

0.5

(9.2.10.2) Categories of substances included

Select all that apply
☑ Priority substances listed under the EU Water Framework Directive

(9.2.10.3) List the specific substances included

Chemical Oxygen Demand (COD)

(9.2.10.4) Please explain

Our facilities do not discharge nitrates or phosphates directly, and pesticides are not used in our operations. Emissions to water are monitored through periodic laboratory analysis, and COD is used as a representative parameter under the EU Water Framework Directive. In 2024, total COD emissions were approximately 0.50 metric tons, mainly from domestic-type wastewater generated at our factories. All wastewater is pre-treated and discharged via licensed third-party municipal channels, located in a water-stressed region. The parameter is monitored in compliance with local regulations, and assurance verification has been conducted. [Fixed row]

(9.3) In your direct operations and upstream value chain, what is the number of facilities where you have identified substantive water-related dependencies, impacts, risks, and opportunities?

Direct operations

(9.3.1) Identification of facilities in the value chain stage

Select from:

☑ Yes, we have assessed this value chain stage and identified facilities with water-related dependencies, impacts, risks, and opportunities

(9.3.2) Total number of facilities identified

4

(9.3.3) % of facilities in direct operations that this represents

Select from:

☑ 100%

(9.3.4) Please explain

The company operates four facilities (Hadımköy, Ömerli-1, Ömerli-2, and Atlas Ofset), all of which have been identified as having substantive water-related dependencies, impacts, risks, and opportunities. This represents 100% of the direct operations. Water-related issues such as groundwater dependency, discharge management, and water stress in the Istanbul basin are material for all sites, influencing operational continuity and long-term sustainability strategies.

Upstream value chain

(9.3.1) Identification of facilities in the value chain stage

Select from:

☑ Yes, we have assessed this value chain stage and identified facilities with water-related dependencies, impacts, risks, and opportunities

(9.3.2) Total number of facilities identified

4

(9.3.4) Please explain

In the upstream value chain, the four facilities (Hadımköy, Ömerli-1, Ömerli-2, and Atlas Ofset) are considered as critical points with substantive water-related dependencies and risks. Supplier and input-related activities are closely linked to these facilities, making water management a shared responsibility across the value chain. The organization recognizes that dependencies on groundwater and discharges to third-party channels create potential risks that must be managed both internally and with upstream partners.
[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)

Hadımköy

(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

Turkey

☑ Other, please specify :Marmara Basin

(9.3.1.8) Latitude

41.142083

(9.3.1.9) Longitude

28.641207

(9.3.1.10) Located in area with water stress

Select from:

☑ Yes

(9.3.1.13) Total water withdrawals at this facility (megaliters)

8.77

(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

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

8.77

(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)

6.45

(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

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

6.45

(9.3.1.27) Total water consumption at this facility (megaliters)

2.32

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:
☑ Higher

(9.3.1.29) Please explain

Water withdrawals increased compared to the previous year due to higher production activity. Discharges rose in line with withdrawals and were sent to third-party municipal treatment. Consumption also increased, reflecting higher process water use and evaporation. All figures are based on direct flow meter measurements, with consumption calculated as withdrawals minus discharges.

Row 2

(9.3.1.1) Facility reference number

Select from:

☑ Facility 2

(9.3.1.2) Facility name (optional)

Ömerli 1

(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

Turkey

☑ Other, please specify :Turkey - Other, please specify

(9.3.1.8) Latitude

41.114864

(9.3.1.9) Longitude

28.634859

(9.3.1.10) Located in area with water stress

Select from:

☑ Yes

(9.3.1.13) Total water withdrawals at this facility (megaliters)

4.27

(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

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

4.27

(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)

3.17

(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

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

3.17

(9.3.1.27) Total water consumption at this facility (megaliters)

1.09

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Higher

(9.3.1.29) Please explain

Withdrawals increased compared to the previous year due to higher production demand. Discharges rose accordingly and were managed through municipal treatment. Consumption increased, mainly due to additional process requirements and minor evaporation losses. Data are based on direct flow meter measurements, with consumption calculated as withdrawals minus discharges.

Row 3

(9.3.1.1) Facility reference number

Select from:

☑ Facility 3

(9.3.1.2) Facility name (optional)

Ömerli 2

(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

Turkey
☑ Other, please specify :Marmara Basin

(9.3.1.8) Latitude

41.112179

(9.3.1.9) Longitude

28.640376

(9.3.1.10) Located in area with water stress

Select from:
☑ Yes

(9.3.1.13) Total water withdrawals at this facility (megaliters)

0.3

(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

0.3

(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)

0.22

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ Lower

(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)

0.08

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Lower

(9.3.1.29) Please explain

Withdrawals decreased slightly compared to the previous year, reflecting stable but more efficient operations. Discharges also declined in line with withdrawals and continued to be directed to third-party municipal treatment. Consumption fell as a result of reduced groundwater use and efficiency measures. Data are based on direct flow meter measurements, with consumption calculated as withdrawals minus discharges.

Row 4

(9.3.1.1) Facility reference number

Select from:

☑ Facility 4

(9.3.1.2) Facility name (optional)

Atlas Ofset

(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

Turkey

☑ Other, please specify :Marmara Basin

(9.3.1.8) Latitude

41.187077

(9.3.1.9) Longitude

28.603095

(9.3.1.10) Located in area with water stress

Select from:

☑ Yes

(9.3.1.13) Total water withdrawals at this facility (megaliters)

0.28

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ This is our first year of measurement

(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

0.28

(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)

0.2

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ This is our first year of measurement

(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

0.2

(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:

☑ This is our first year of measurement

(9.3.1.29) Please explain

Atlas Ofset was included in the reporting boundary for the first time in 2024. Withdrawals, discharges, and consumption were measured and recorded separately for this facility. Discharges were directed to third-party municipal treatment. Consumption reflects process use and minor evaporation. All figures are based on flow meter measurements, with consumption calculated as withdrawals minus discharges.
[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

The amount of water entering and discharging has been verified within the scope of the corporate carbon footprint calculation. Therefore, verification has been carried out under the GHG protocol.

Water withdrawals – volume by source

(9.3.2.1) % verified

Select from:
☑ 76-100

(9.3.2.2) Verification standard used

The amount of water entering and discharging has been verified within the scope of the corporate carbon footprint calculation. Therefore, verification has been carried out under the GHG protocol.

Water withdrawals – quality by standard water quality parameters

(9.3.2.1) % verified

Select from:

☑ 76-100

(9.3.2.2) Verification standard used

The amount of water entering and discharging has been verified within the scope of the corporate carbon footprint calculation. Therefore, verification has been carried out under the GHG protocol.

Water discharges – total volumes

(9.3.2.1) % verified

Select from:

☑ 76-100

(9.3.2.2) Verification standard used

The amount of water entering and discharging has been verified within the scope of the corporate carbon footprint calculation. Therefore, verification has been carried out under the GHG protocol.

Water discharges – volume by destination

(9.3.2.1) % verified

Select from:

☑ 76-100

(9.3.2.2) Verification standard used

The amount of water entering and discharging has been verified within the scope of the corporate carbon footprint calculation. Therefore, verification has been carried out under the GHG protocol.

Water discharges – volume by final treatment level

(9.3.2.1) % verified

Select from:

☑ 76-100

(9.3.2.2) Verification standard used

The amount of water entering and discharging has been verified within the scope of the corporate carbon footprint calculation. Therefore, verification has been carried out under the GHG protocol.

Water discharges – quality by standard water quality parameters

(9.3.2.1) % verified

Select from:

☑ 76-100

(9.3.2.2) Verification standard used

The amount of water entering and discharging has been verified within the scope of the corporate carbon footprint calculation. Therefore, verification has been carried out under the GHG protocol.

Water consumption – total volume

(9.3.2.1) % verified

Select from:

☑ 76-100

(9.3.2.2) Verification standard used

The amount of water entering and discharging has been verified within the scope of the corporate carbon footprint calculation. Therefore, verification has been carried out under the GHG protocol.
[Fixed row]

(9.5) Provide a figure for your organization’s total water withdrawal efficiency.

(9.5.1) Revenue (currency)

2003012837

(9.5.2) Total water withdrawal efficiency

147064084.95

(9.5.3) Anticipated forward trend

Since both our water withdrawal and revenue have changed compared to last year, the figure followed a similar trend. The increase in withdrawal volumes is mainly due to higher production activity and the inclusion of the newly added Atlas Ofset facility within the reporting boundary. Looking ahead, we expect our annual revenue to increase and our consumption to decrease thanks to efficiency and recycling projects, so we anticipate this figure to gradually decrease.
[Fixed row]

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

(9.13.1) Products contain hazardous substances

Select from:
☑ No

(9.13.2) Comment

Our products and wastewater streams do not contain any substances classified as hazardous by regulatory authorities. All wastewater generated is similar in quality to domestic sewage and is discharged via licensed third-party municipal channels after required pre-treatment. Compliance with national environmental regulations ensures that no hazardous, persistent, or toxic substances are present in our operations.
[Fixed row]

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

(9.14.1) Products and/or services classified as low water impact

Select from:

☑ Yes

(9.14.2) Definition used to classify low water impact

We classify products made from FSC-certified paper as low water impact. The criteria are based on responsible sourcing standards and improved efficiency in water use throughout the raw material production process. FSC certification ensures that water resources are better managed within forests, and that production processes are less water intensive compared to conventional paper. The classification applies to the raw material procurement stage of our value chain, considering both water quantity and quality aspects.

(9.14.4) Please explain

FSC (Forest Stewardship Council) certified paper typically has a lower virtual water footprint than non-certified alternatives, as it promotes sustainable forestry practices and efficient water resource management. This certification reflects both environmental and social responsibility in raw material sourcing. While the exact reduction in virtual water footprint may vary depending on regional production conditions, FSC-certified inputs are globally recognized for mitigating water-related impacts. Therefore, our FSC-certified products are grouped as low water impact within our portfolio.
[Fixed row]

(9.15) Do you have any water-related targets?

Select from:

☑ Yes

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

	Target set in this category	Please explain
Water pollution	*Select from:* ☑ Yes	*Rich text input [must be under 1000 characters]*
Water withdrawals	*Select from:* ☑ Yes	*Rich text input [must be under 1000 characters]*
Water, Sanitation, and Hygiene (WASH) services	*Select from:* ☑ Yes	*Rich text input [must be under 1000 characters]*
Other	*Select from:* ☑ No, and we do not plan to within the next two years	*All relevant water-related targets are already disclosed.*

[Fixed row]

(9.15.2) Provide details of your water-related targets and the progress made.

Row 1

(9.15.2.1) Target reference number

Select from:
☑ Target 1

(9.15.2.2) Target coverage

Select from:

☑ Organization-wide (direct operations only)

(9.15.2.3) Category of target & Quantitative metric

Water pollution

☑ Reduction in concentration of pollutants

(9.15.2.4) Date target was set

12/30/2022

(9.15.2.5) End date of base year

12/30/2021

(9.15.2.6) Base year figure

40.8

(9.15.2.7) End date of target year

12/30/2030

(9.15.2.8) Target year figure

40

(9.15.2.9) Reporting year figure

40.5

(9.15.2.10) Target status in reporting year

Select from:

☑ Underway

(9.15.2.11) % of target achieved relative to base year

37

(9.15.2.12) Global environmental treaties/initiatives/ frameworks aligned with or supported by this target

Select all that apply

☑ None, no alignment after assessment

(9.15.2.13) Explain target coverage and identify any exclusions

This target is company-wide covering all facilities are included. There is no any exclusion.

(9.15.2.14) Plan for achieving target, and progress made to the end of the reporting year

Maintain pretreatment efficiency, optimize chemical use, and enhance continuous monitoring of effluent quality. COD reduction is tracked annually through accredited laboratories. Ongoing process improvements aim to reach 2030 target despite minor annual fluctuations.

(9.15.2.16) Further details of target

The target aims to reduce COD levels in wastewater from all facilities. While variations occur due to production intensity, improvements in pre-treatment and monitoring practices keep the company on track for 2030. No exclusions apply. This target is directly overseen by the Sustainability Committee, which reviews COD reduction progress on a quarterly basis.

Row 2

(9.15.2.1) Target reference number

Select from:

☑ Target 3

(9.15.2.2) Target coverage

Select from:

☑ Organization-wide (direct operations only)

(9.15.2.3) Category of target & Quantitative metric

Water, Sanitation, and Hygiene (WASH) services

☑ Increase in the proportion of employees using safely managed drinking water services

(9.15.2.4) Date target was set

12/30/2022

(9.15.2.5) End date of base year

12/30/2021

(9.15.2.6) Base year figure

0.03

(9.15.2.7) End date of target year

12/30/2030

(9.15.2.8) Target year figure

0.02

(9.15.2.9) Reporting year figure

0.03

(9.15.2.10) Target status in reporting year

Select from:

☑ Underway

(9.15.2.11) % of target achieved relative to base year

0

(9.15.2.12) Global environmental treaties/initiatives/ frameworks aligned with or supported by this target

Select all that apply

☑ None, no alignment after assessment

(9.15.2.13) Explain target coverage and identify any exclusions

This target is company-wide covering all facilities are included. There is no any exclusion.

(9.15.2.14) Plan for achieving target, and progress made to the end of the reporting year

Perlator replacement project initiated in 2024, expected to reduce faucet-related water consumption by 50%. Although the project was not completed by year-end, preparatory actions (thermostatic valves, overflow prevention, steam system optimizations) have already reduced water use at Ömerli-1 by 44% in early 2025. Future reporting years will capture these reductions.

(9.15.2.16) Further details of target

The target aims to ensure all employees have access to safely managed WASH services while reducing per capita consumption. Early technical measures demonstrated measurable reductions, but since implementation started in 2025, impacts are not reflected in 2024 reporting figures.

Row 3

(9.15.2.1) Target reference number

Select from:

☑ Target 2

(9.15.2.2) Target coverage

Select from:

☑ Organization-wide (direct operations only)

(9.15.2.3) Category of target & Quantitative metric

Water withdrawals

☑ Reduction of water withdrawals from groundwater

(9.15.2.4) Date target was set

12/30/2022

(9.15.2.5) End date of base year

12/30/2021

(9.15.2.6) Base year figure

11.29

(9.15.2.7) End date of target year

12/30/2030

(9.15.2.8) Target year figure

10.0

(9.15.2.9) Reporting year figure

13.62

(9.15.2.10) Target status in reporting year

Select from:

☑ Underway

(9.15.2.11) % of target achieved relative to base year

-181

(9.15.2.12) Global environmental treaties/initiatives/ frameworks aligned with or supported by this target

Select all that apply

☑ None, no alignment after assessment

(9.15.2.13) Explain target coverage and identify any exclusions

This target is company-wide covering all facilities are included. There is no any exclusion.

(9.15.2.14) Plan for achieving target, and progress made to the end of the reporting year

Efficiency upgrades, recycling projects, and close monitoring of well water withdrawals. Withdrawal volumes rose in 2024 due to the inclusion of Atlas Ofset facility, but efficiency per unit output improved. Medium-term reductions will be supported by greywater reuse and full perlator replacement.

(9.15.2.16) Further details of target

The objective is to reduce total groundwater withdrawals to 10 ML by 2030. While absolute withdrawals increased in 2024 with organizational boundary expansion, operational efficiency measures keep the company on track to meet its 2030 target.
[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

[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?
	Select from: ☑ No, we do not use indicators, but plan to within the next two years

[Fixed row]

(11.4) Does your organization have activities located in or near to areas important for biodiversity in the reporting year?

	Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity	Comment
Legally protected areas	*Select from:* ☑ No	*All facilities are located within industrial zones.*
UNESCO World Heritage sites	*Select from:* ☑ No	*All facilities are located within industrial zones.*
UNESCO Man and the Biosphere Reserves	*Select from:* ☑ No	*All facilities are located within industrial zones.*
Ramsar sites	*Select from:* ☑ No	*All facilities are located within industrial zones.*
Key Biodiversity Areas	*Select from:* ☑ No	*All facilities are located within industrial zones.*
Other areas important for biodiversity	*Select from:* ☑ No	*All facilities are located within industrial zones.*

[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

☑ Water

(13.1.1.2) Disclosure module and data verified and/or assured

Environmental performance – Climate change

☑ Electricity/Steam/Heat/Cooling consumption

☑ Emissions breakdown by business division

☑ Fuel consumption

(13.1.1.3) Verification/assurance standard

General standards

☑ ISAE 3000

☑ ISAE 3410, Assurance Engagements on Greenhouse Gas Statements

(13.1.1.4) Further details of the third-party verification/assurance process

Within the reporting year, the data points disclosed in our CDP response that overlap with our TSRS (Türkiye Sürdürülebilirlik Raporlama Standartları, aligned with IFRS S1 & S2) reporting were subject to independent assurance as part of the statutory audit process. This includes Scope 1 and Scope 2 GHG emissions, energy consumption, water withdrawal and discharge volumes, and waste generation and recovery figures. As this is our first year of TSRS-aligned reporting, certain disclosures — such as comparative prior-year data, scenario analysis assumptions, and the quantification of financial impacts of risks and opportunities — were exempt from verification. These elements will be gradually brought into the assurance scope in line with the phased TSRS implementation.
[Add row]

(13.3) Provide the following information for the person that has signed off (approved) your CDP response.

(13.3.1) Job title

Chief Executive Offier

(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 website.

Select from:

☑ No