



OUR STRENGTH IS IN EVERY MOMENT OF LIFE



2024 TSRS COMPLIANT SUSTAINABILITY REPORT

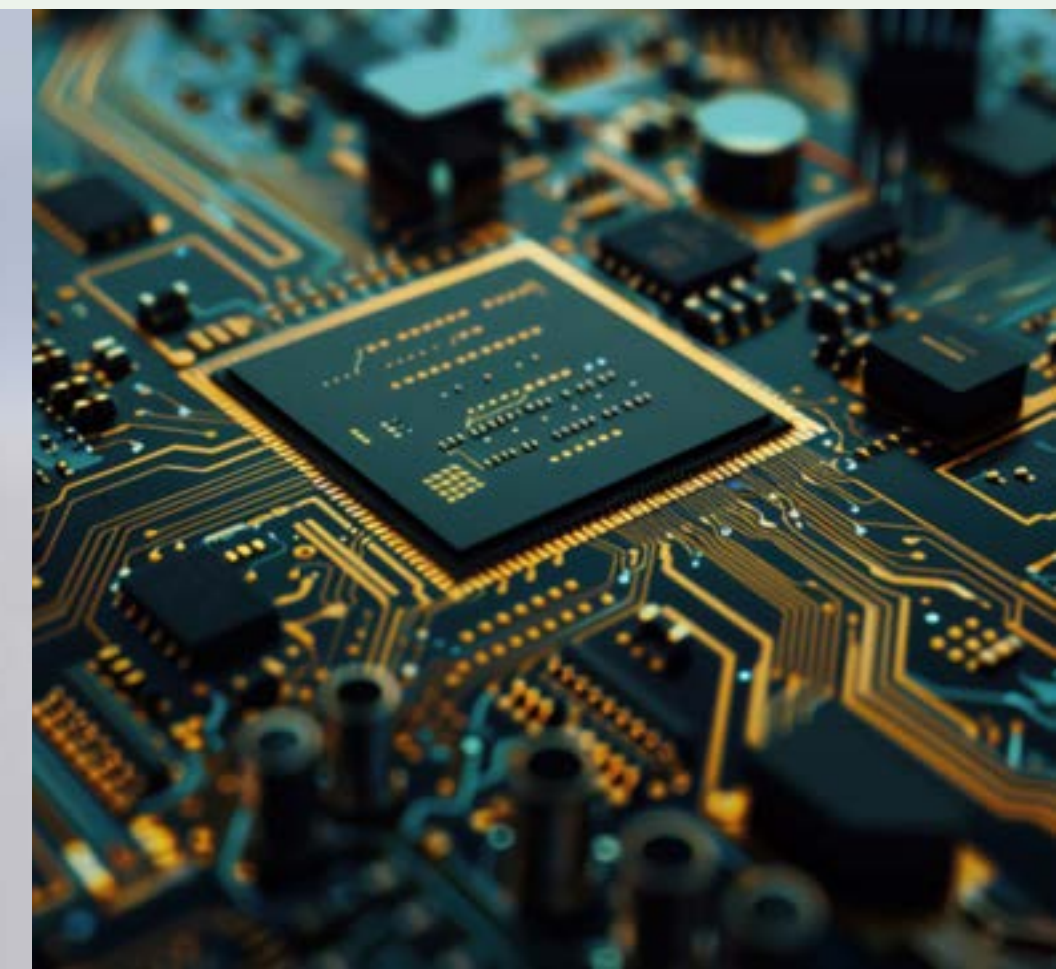
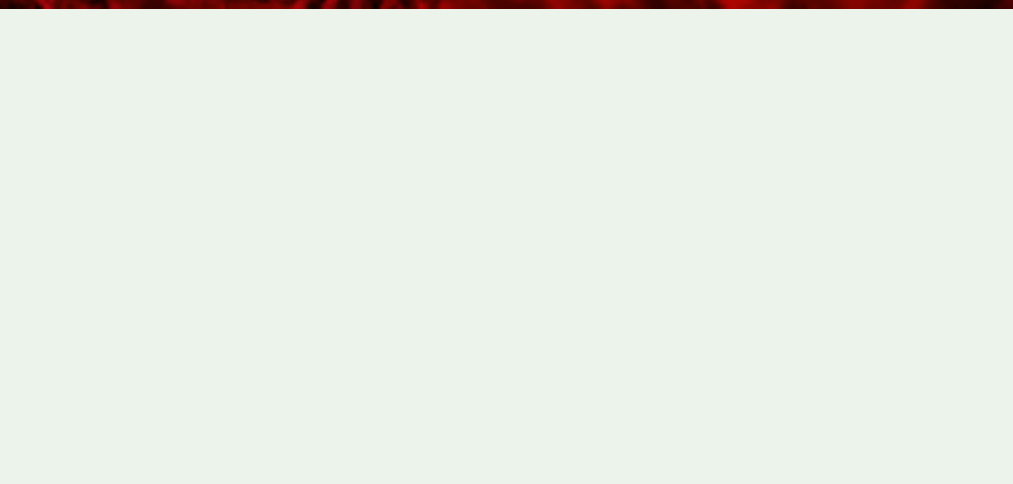


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ABOUT THE REPORT



ABOUT THE REPORT

REPORT PERIOD AND COMPLIANCE WITH FINANCIAL STATEMENTS AND SCOPE

Sarkuysan Elektrolitik Bakır Sanayi ve Ticaret A.Ş. (Sarkuysan) 2024 Türkiye Sustainability Reporting Standards (TSRS) report includes the period between the dates of 01.01.2024 and 31.12.2024. Data used during the reporting process have been prepared based on the same currency (TL) and the relevant reporting considerations compliant to the financial statements including the same period. The details of Affiliated Companies of the Company as of December 31, 2024, are presented below.

AFFILIATED COMPANIES AS OF DECEMBER 31, 2024					
Affiliated Companies as of December 31, 2024	Title of the Affiliated Company		Field of Activity	Country	Affiliation Percentage %
Sarkuysan A.Ş.	Sarmakina San. ve Tic. A.Ş.	Packaging material (steel reel), production machinery manufacturing, and trade.	Türkiye		99,00
Sarkuysan A.Ş.	Sarda Dağ. ve Tic.A.Ş.	Marketing and distribution.	Türkiye		99,97
Sarkuysan A.Ş.	Bektaş Emaye Kablo San. Tic. A.Ş.	The company receives real estate rental income and affiliation income.	Türkiye		70,71
Sarda Dağ. Ve Tic. A.Ş	Bektaş Emaye Kablo San. Tic. A.Ş.	The company receives real estate rental income and affiliation income.	Türkiye		29,13
Sarkuysan A.Ş.	Aegean Free Trade Zone Branch Office	Electrolyte copper wire manufacture and trade.	Türkiye		100,00
Sarkuysan A.Ş.	Bemka Kupferlackdraht GMBH.	Marketing and Distribution	Germany		99,60
Sarkuysan A.Ş.	Sark Bulgaria A.D.	Electrolyte copper and conductor production	Bulgaria		90,00
Sarkuysan A.Ş.	Sark Wire Corp.	Copper wire production and marketing.	USA		73,34
Bektaş Emaye Kablo San. Tic. A.Ş.	Sark Wire Corp.	Copper wire production and marketing.	USA		12,12
Sarmakina San. ve Tic. A.Ş.	Sark Wire Corp.	Copper wire production and marketing.	USA		14,54
Sarmakina San. ve Tic. A.Ş.	Sark Bulgaria A.D.	Electrolyte copper and conductor production	Bulgaria		10,00
Sarmakina San. ve Tic. A.Ş.	Sark Gıda San. Tic. A.Ş.	Food purchasing and selling activity.	Türkiye		99,00
Sarkuysan A.Ş.	CRW Metal San. ve Tic. A.Ş.	Electrolyte copper wire manufacture and trade.	Türkiye		42,50
Sarmakina San. ve Tic. A.Ş.	CRW Metal San. ve Tic. A.Ş.	Electrolyte copper wire manufacture and trade.	Türkiye		40,00
Sarmakina San. ve Tic. A.Ş.	Sar Makina Bulgaria EAD.	Packaging material (steel reel), production machinery manufacturing, and trade.	Bulgaria		99,00

In financial statements, all affiliated companies are consolidated through full consolidation method; Sarkuysan and its consolidated affiliated companies are referred to as the “Group” in financial statements. Other than above mentioned affiliated companies, the Group owns 44.44% of Demisaş Döküm Emaye Mam. San. A.Ş. which is traded in Istanbul Stock Exchange with activities in manufacturing and trading all kinds of iron, casting, enamelware, enamel casting containers, and other goods for automotive and domestic appliances industry. This affiliation is accounted in the financial statements using the method of equity interest.

For GHG emissions reporting purposes, Sarkuysan used operational control approach in determining its organizational limits. According to this approach, GHG emissions of affiliated companies under operational control were included in the emission inventory.

This report was prepared taking into account TSRS 1 and TSRS 2 in line with Türkiye Sustainability Reporting Standards (TSRS). Regarding sector-based implementations of TSRS 2, sector-based “Volume 10: Metals and Mining” was used. GHG emissions were calculated according to ISO 14064-1. In the assessments of climate change risks and opportunities, assessments were made mainly considering climate scenarios published by The Intergovernmental Panel on Climate Change (IPCC) and International Energy Agency (IEA).

The Group activities are concentrated on the Company’s facilities located at Gebze/Kocaeli province. Especially approximately 96% of Scope 1 emissions, 85% of energy consumption, and 71% of water consumption are made in the facilities located at Gebze district of Kocaeli province. In this frame, mainly this particular geographical location was considered in the explanations made in Strategy Section regarding risks and opportunities.

As explained in the governance section, works are ongoing regarding taking into account Sustainability goals and strategies as well as risks and opportunities in relation to sustainability, particularly climate, and creating information, documentation, and reporting processes for the organization; significance principle defined as part of TSRS 1 and data compliance, current skills, abilities and resources were considered in the financial statements regarding Sustainability, and as this is the first year of reporting, mainly qualitative explanations were included.

STATEMENT OF COMPLIANCE

The Report was prepared in compliance with Türkiye Sustainability Reporting Standards (TSRS 1 and TSRS 2), and it is fully compliant to the standards and guides published by the Public Oversight, Accounting and Auditing Standards Authority (KGK). The report herein was approved by the Executive Board on 31.10.2025, thus authorized to be published.

TRANSITION RELIEFS

TSRS 1/E3 and TSRS 2/C3: In this first reporting period, comparative information could not be provided with regard to past years in the explanations regarding sustainability and climate provided as part of TSRS. Only information and data regarding the current year (2024) were shared in the explanations with regard to climate and the scope of TSRS 1.

TSRS 1/E4: In the first annual reporting period, financial statements belonging to January 1 and December 31, 2024, were published, and then financial explanations regarding sustainability were prepared and published.

TSRS 1/E5 and TSRS 1/E6: In the first annual reporting period, only risks and opportunities regarding climate were shared in scope of TSRS 2. Detailed explanations regarding other sustainability subjects were not presented for this reporting period, but they will be provided in the next reporting periods.

Scope 3 GHG emissions were also excluded, and they were not included in the report; Scope 3 explanations will be provided for the next periods.

SUBSEQUENT EVENTS

There were no operations, events or conditions that arose in the period between the end of the reporting period and the publication approval date of this document.

LIMITED ASSURANCE ENGAGEMENT

This report was subjected to limited assurance inspection conducted by MGI Bağımsız Denetim A.Ş. as part of Türkiye Sustainability Reporting Standards (TSRS) regulation. The inspection in question involves assessment of compliance with TSRS 1 and TSRS 2 provisions and the accuracy and consistency of the explanations. The limited assurance report prepared by MGI Bağımsız Denetim A.Ş. was provided in the annex.

ABOUT SARKUYSAN



SARKUYSAN IN FIGURES



Our initial production capacity of 10,000 tons/year went beyond 220,000 tons/year today, reaching a global scale.

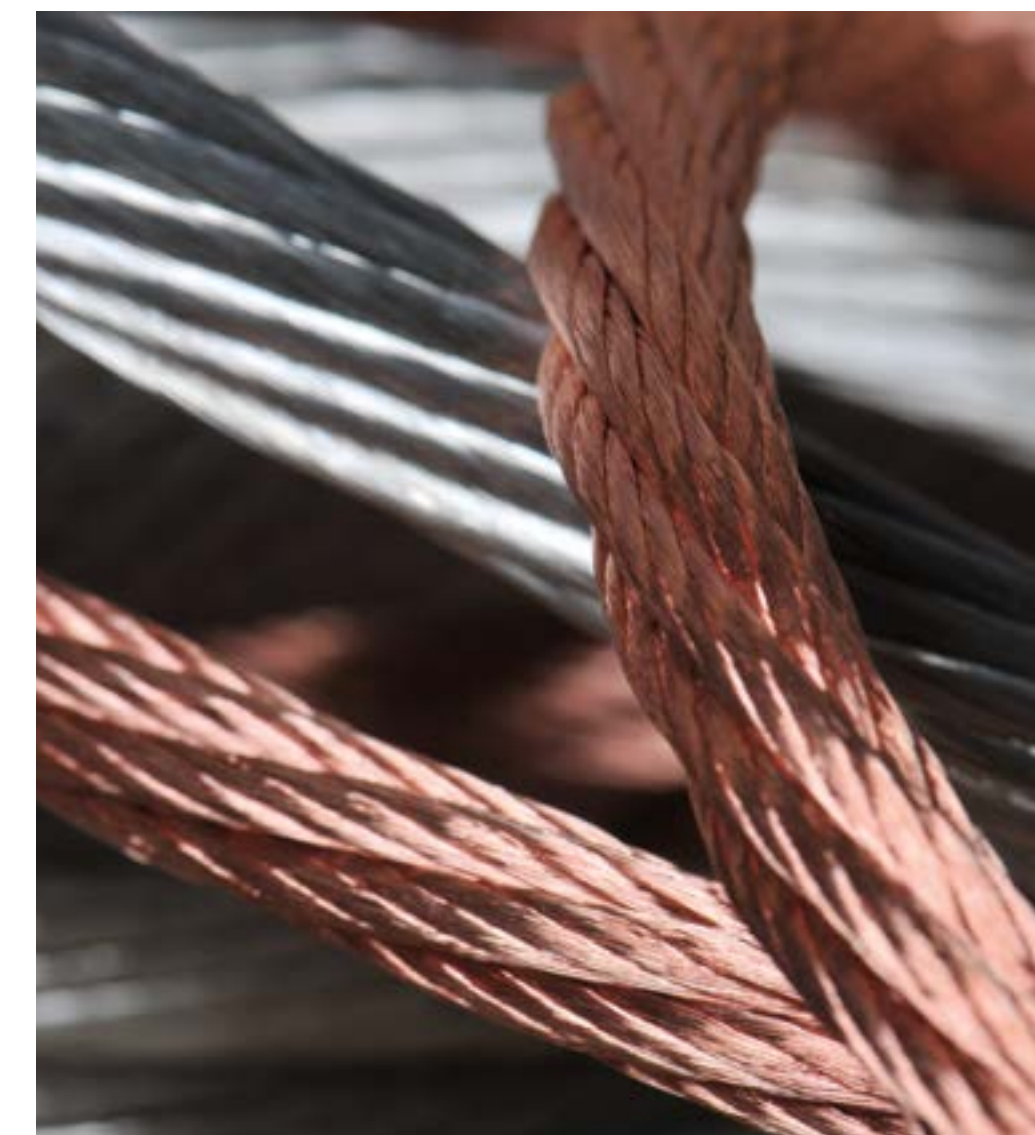
The Company has a significant place in the country's industrialization history as it is the first successful publicly traded and aggregate company. The Company, which produces electrolytic copper products, copper tubes and copper busbars over an area exceeding 200,000 m² in the Gebze, Tuzla and Darica regions, with an indoor area of approximately 90,000 m², increased its initial capacity of 10,000 tons/year to over 220,000 tons/year and became a global company.

The products are used as standard inputs in electro-technic, electronics, engine, communication, power generation and distribution, solar power, household

appliances, measuring devices, defense, automotive, chemical, construction, heating-ventilation, and sanitary installation industries. All our operations are certified by national and international standards. Accordingly, Sarkuysan is certified with TS EN ISO 9001 and IATF 16949 Quality, ISO 14001 Environment, ISO 45001 Occupational Health and Safety, and ISO 50001 Energy Management System. Using the "sks" brand on its products, Sarkuysan meets a substantial part of the domestic demand while exporting approximately half of its production range to more than 70 countries in 5 continents. Today, a considerable number of the cars and commercial vehicles produced in Europe use Sarkuysan wires. The Company has been providing oxygen-free and nickel-plated copper wires to the suppliers of NASA in the USA for years as well as the aircraft manufacturers lately.

Having approximately 2,000 employees in total, about 90% of the personnel of our group of companies working in the production units have either vocational school or high school degrees, and they are included in the in-house and outsourced training programs every year.

Our country's economy endured a quite unsteady and inflationary year due to the developments beginning and ongoing with the global pandemic. Like all other countries, inflation increased in our country as well and negatively affected the economies. Despite the challenges, our country's economy completed 2024 with a positive growth with the measures taken, although it was below the targeted economic growth. The net period profit of our Company in 2024 was 350,753,049 TL.



MILESTONES

- Sarkuysan founded with the guidance of goldsmiths and jewelers at Kapalıçarşı (the Grand Bazaar).

1972

- First production with electrolyte copper cathode production.

1975

- Tin-plated wire production begins.

1978

- Sarda A.Ş. and Bektaş A.Ş. founded
 - The capacity of anode casting workshop increased.

1979

- The first export to Europe of copper bars achieved.

1980

- Listed in the Stock Exchange for the first time
- Sarkuysan High School and Sports Club founded.

1986

- Southwire casting plant commissioned.

1987

- Sar Makina A.Ş. founded.

1991

- Sark-USA founded and sales and distribution network established in the North America.

2002

- Sarkuysan Italia founded.

2001

- Contirod casting plant established
- Production of tubes and nickel-plated wires initiated.

1998



- The cogeneration plant, a significant investment in the energy infrastructure and sustainability efforts of our company established.

1997

- Production information system commissioned.

1996

- Sarkuysan Mosque opened for service.

1993

- Sark-Wire Albany begins production.

2008

- Sarkuysan Elementary School started its educational activities.

2009

- PV ribbon wire production begins.

2014

- Sark-Wire Georgia plant established

2015

- Sark Bulgaria founded.
- SAP system launched.
 - The merger process with Bemka Kupferlackdraht GMBH completed.

2016

- Our company entitled to get the "R&D Center License" granted by the Ministry of Industry and Technology.

2018

- Sark Bulgaria begins production of copper and copper alloy products.

2019

- 50Th anniversary of our organization celebrated with various events.
- Decision made to be affiliated with CRW Metal Sanayi A.Ş. at the ratio of 42.50%.

2022

VISION, MISSION & VALUES

VISION

As a global company in electrolyte copper sector, to make production sustainable in line with an environment-friendly, high-quality, competitive, and innovative approach focused on customer satisfaction.

MISSION

To maintain our prestigious position in Türkiye and worldwide, provide benefit to our country, partners, employees, and customers and create social value through the social responsibility projects accomplished with the responsibility of serving as a model and being a public, aggregate, professionally managed and successful corporation in Türkiye.

VALUES

Respect, Trust and Loyalty

We have an open and long-term relationship with our employees based on mutual trust, respect, and success. Quality, health, safety, and commitment to the environment are among our goals.

Creating Value and Team Spirit

We achieve together; we believe in the power of achieving together. We share know-how and experience, adopt a solution-oriented approach, trust ourselves and each other, appreciate and celebrate, accept our differences, and work and succeed together in line with our goal to create added value.

Being Innovative and Open to Development

The principles of innovation and continuous development are among our main goals. We consider the training and personal development of our employees an integral part of our Company culture; thus, we try to create a participatory Company culture and environment where they can reveal their potential.

Openness, Honesty, and Transparency

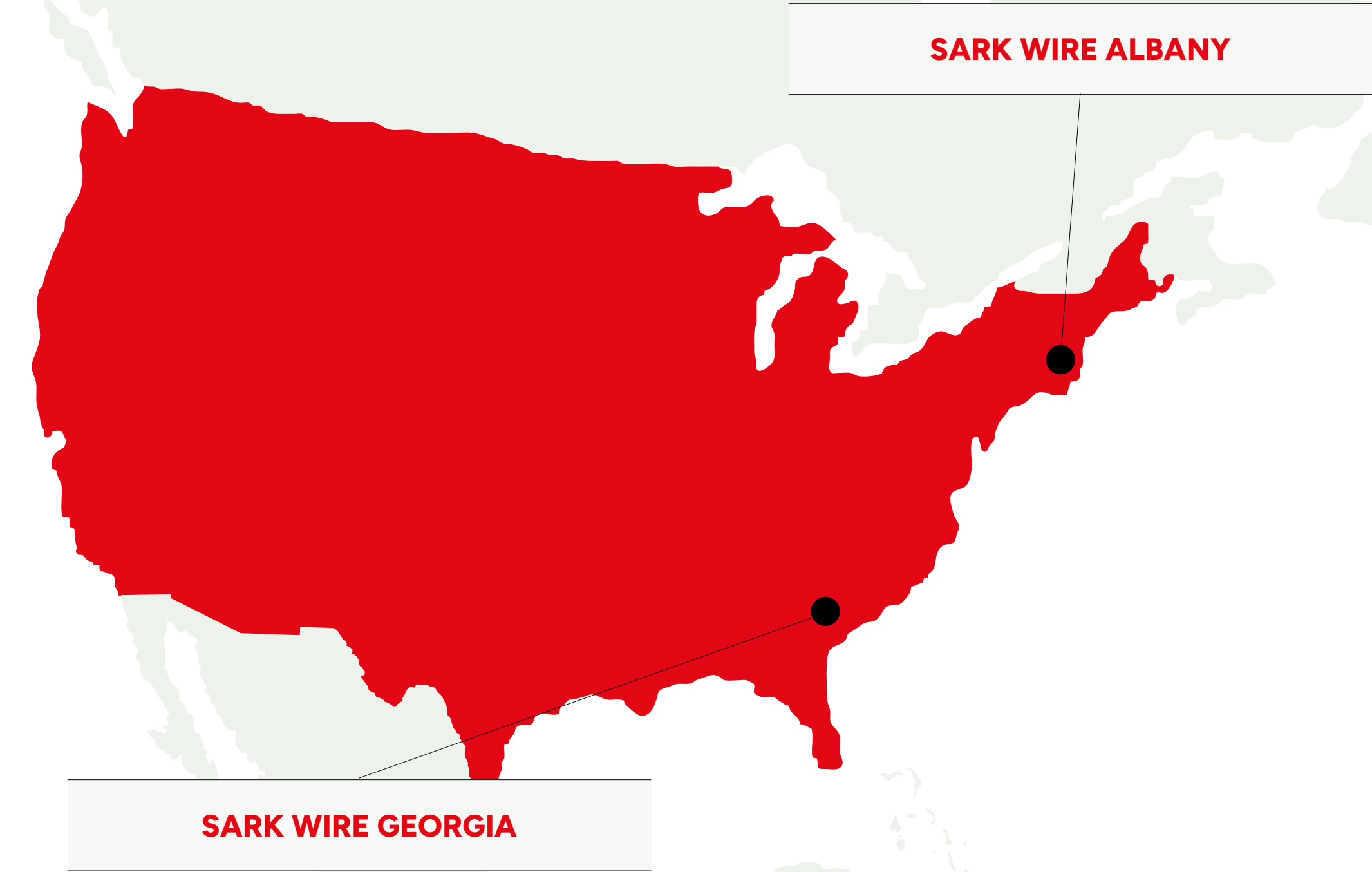
We fully comply with the relevant laws and regulations and globally recognized ethical values in all our operations. We attach significance to act transparently regarding the decisions and operations that affect the environment, society, and economy, and to have honest and clear communication with stakeholders. Since the day we were founded, we have adopted a corporate governance approach with the principle of being transparent and accountable in all our operations.

Responsibility and Sustainability

Being aware of our responsibilities in managing all stages of our operations, we act in compliance with corporate sustainability mentality, which is aware of economic, environmental, and social responsibilities towards internal and external stakeholders.

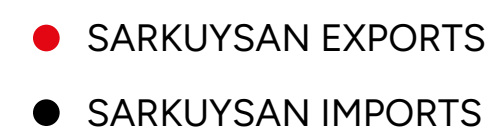
SARKUYSAN ON A GLOBAL SCALE

Sarkuysan exports nearly US\$ 1 billion annually by reaching over 600 active customers in more than 70 countries over 5 continents.



EXPORT-IMPORT

Sarkuysan imports approximately US\$ 1 billion of raw materials annually from various countries.



INDUSTRY & MARKET

Sustainability and quality are ensured through production processes sensitive to the environment; copper products supported by advanced technologies are provided to the sector.

The size of global electrolytic copper wire and cables market is US\$ 325 billion, and the market share of Türkiye is around 2%. Sarkuysan products are used as standard inputs in electro-technical, electronics, motor, communication, electricity generation and distribution, solar power, household appliances, measuring devices, defense, automotive, chemicals, construction, heating-ventilation, and sanitary installation sectors.



- Copper wires are used in the automotive, defense, communication, construction, electronics, and railway sectors,
- Tin- and nickel-plated wires are used in various fields, including the maritime and aviation industries, where high temperature, corrosion resistance is required,
- Tubes are used in HVAC and sanitary projects
- Busbars are used in electrical distribution panels
- Enameled wires, flat wires, CTC wires are used in coils and transformers
- Ribbon wires are used in solar panels
- Railway catenary conductors are used in electrification systems of the rail transportation.



GOVERNANCE



GOVERNANCE

GENERAL OVERVIEW OF SUSTAINABLE GOVERNANCE STRUCTURE

Sarkuysan Elektrolitik Bakır Sanayi ve Ticaret A.Ş. considers sustainability as an integral part of its corporate strategy; the company adopts a global sustainability approach encompassing environmental, social, and governance (ESG) dimensions.

The company’s understanding of sustainability is shaped in line with shareholder expectations, legal obligations, international standards, and goals of creating long-term corporate values.

Sustainability processes are conducted under the roof of Corporate Sustainability and Innovation System (CSIS); the system is planned to be integrated into the strategic targets of the company, managed on a corporate level, and based on continuous improvement principle.

Works are currently ongoing to build infrastructure to enable sustainability goals and strategies as well as risks and opportunities regarding sustainability, particularly climate, to be considered in operational processes. Corporate Management and Sustainability Committee (CMSC), operating under the supervision of the Board of Directors, Corporate Sustainability, and Innovation Board (CSIB) and 14 sub-committees, organized according to sustainability priorities, will be supported by corporate governance mechanisms covering identification, implementation, reporting and performance management of sustainability strategies.



Sustainability governance model is based on corporate management principles, transparency, responsibility, accountability, and ethical management. Main topics in this context are as follows:

- Mitigation of environmental impacts,
- Improvement of employee wellbeing and occupational health and safety,
- Consolidation of supply chain responsibility,
- Supporting innovation culture,
- Creating value for the community.

Ongoing works to integrate sustainability goals and strategies as well as risks and opportunities regarding sustainability, particularly climate, in operational processes are planned to accelerate significantly in 2026-2027. Works to be conducted in this context will involve the following:

- Systematic integration of risks and opportunities associated with climate and sustainability into corporate decision-making mechanisms,
- Structuring reporting processes for the Board of Directors,
- Organizing reporting processes from sub-committees to sustainability committee,
- Creating systematic documentation and information management processes to support sustainability strategies,

- Defining control mechanisms in priority areas such as carbon emission monitoring, energy management, and supplier assessment, clarifying job descriptions, and reporting responsibilities, completing infrastructure deficiencies.

The ultimate goal of the process is to clarify authorities and obligations of all relevant units under the roof of corporate governance in a global manner in line with the policies and procedures to be established and the corporate infrastructure.



CORPORATE SUSTAINABILITY AND INNOVATION SYSTEM (CSIS)



ROLES OF BOARD OF DIRECTORS AND CORPORATE GOVERNANCE AND SUSTAINABILITY COMMITTEE

Sarkuysan Elektrolitik Bakır Sanayi ve Ticaret A.Ş. Board of Directors ensures ownership and oversight of sustainability strategy at the highest level. The Board of Directors is responsible for integrating sustainability principles into the business strategies and corporate risk management processes in line with the goal of the company regarding creating long-term value. Ultimate accountability regarding sustainability performance rests with the Board of Directors.

As the only company 100% open to public in Türkiye, Sarkuysan’s Board of Directors comprises of 14 members, most of which are not executives. The Chair and CEO positions are served by separate people. Five independent members serve on the Board of Directors in compliance with the independence criteria stipulated in the Capital Markets Board Corporate Governance Principles. In the core of the Board of Directors, there are Corporate Management and Sustainability Committee (Committee, Sustainability Committee, CMSC), Audit Committee, and Early Detection of Risk Committee which operate under the Board. More information regarding Sarkuysan Board of Directors and the structure of committees as well as their operation principles can be found in the 2024 Annual Report at www.sarkuysan.com.

Sarkuysan positions sustainability at the center of its corporate strategy, and the goal is to conduct the oversight of the risks and opportunities related

to Sustainability, particularly risks and opportunities related to climate, in a manner that is structured around corporate governance systematic. As a result of ongoing works, plans are made to create a multi-layered governance structure for monitoring, assessment, and management of risks and opportunities related to sustainability/climate. Thanks to the structure to be established, all strategic, operational, financial, and other considerations that are thought to create risks and opportunities in relation to sustainability shall be evaluated at every level of the organization, starting from the Board of Directors, in line with the achievement of short, medium, and long-term goals of Sarkuysan. Sarkuysan’s Board of Directors are presented on the side.

The main goal of Sarkuysan’s sustainability policy is to consider the sustainability approach as an essential part of the corporate culture and integrate this approach into decision-making, implementation, and ways of doing business of individuals, teams and stakeholders with products and services. In this context, the responsibility of identification, assessment, prioritization, and reporting of the risks and opportunities related to Sustainability shall be shouldered by the Corporate Management and Sustainability Committee (Committee, Sustainability Committee, CMSC) in the core of Sarkuysan. The Committee shall also be responsible for developing sustainability strategies, establishing annual and long-term goals, and monitoring implementation performances. Committee comprises of members presented on the side.

MEMBERS OF THE BOARD

Name & Surname	Position
Hayrettin ÇAYCI	Chair
Hamit MÜCELLİT	Acting Chair
A. Hamdi BEKTAŞ	Member of the Board
Cenap TAŞKIN	Member of the Board
Turgay ŞOHOĞLU	Member of the Board
Bekir MENETLİOĞLU	Member of the Board
Fatma Burcu CESUR	Member of the Board
Diana Manuş URUN	Member of the Board
İpek ÖZCAN	Member of the Board
Ayhan ZEYTİNOĞLU*	Independent Member of the Board
Virma SÖKMEN	Independent Member of the Board
İlfeta AKSOY	Independent Member of the Board
Mehmet Ali YILDIRIMTÜRK	Independent Member of the Board
Mehmet Nazmi ERTEN	Independent Member of the Board

CORPORATE MANAGEMENT AND SUSTAINABILITY COMMITTEE

Name & Surname	Position in the Company	Duty on the Committee
Mehmet Nazmi ERTEN	Independent Member of the Board	Chair
Turgay ŞOHOĞLU	Member of the Board	Member
Bekir MENETLİOĞLU	Member of the Board	Member
Fatma Burcu CESUR	Member of the Board	Member
İlfeta AKSOY	Member of the Board	Member
Şefiye YAYLA	Investor Relations Manager	Member

(*) As per the relevant regulation, Esteemed Ayhan Zeytinoğlu has completed his term in the office on 18.04.2025. In the 2025 Ordinary General Assembly, Esteemed Fatma Zeynep Kuman was elected as the Independent Member of the Board for the new period.

Main responsibilities of the Corporate Management and Sustainability Committee include:

- Identifying climate-related risks and opportunities,
- Prioritizing and correlating these considerations with annual targets,
- Developing risk-minimizing and opportunity-enhancing action plans,
- Reporting the processes to the relevant governance structures (Board of Directors, Board of Investors, etc.).

Corporate Management and Sustainability Committee works through Corporate Sustainability and Innovation Board (CSIB). The purpose of CSIB is to ensure implementation of the sustainability strategy across the company, integration of performance results into the corporate goals, and establishment of infrastructure to enable implementation of a management model based on continuous improvement. Under the leadership of General Manager, CSIB comprises Vice General Managers and sub-committee managers organized in line with the sustainability priorities. The goal is for the Board to meet at least quarterly and submit its reports to the Committee.



The structure of the Corporate Sustainability and Innovation System-CSIS to be established in the core of Sarkuysan has the purpose of comprising people who are experienced in various fields such as finance, environment, production, supply chain, human resources, etc. among the members of all the relevant committee, board, and sub-committees. In this context, members of committee and sub-committee are expected to be experts in one of the following fields, and all these fields are to be represented in general in the committee:

- Finance
- Environmental management
- Supply chain management
- Energy management
- Waste management
- Manufacturing processes
- Human resources
- Management systems
- Sustainability regulation knowledge

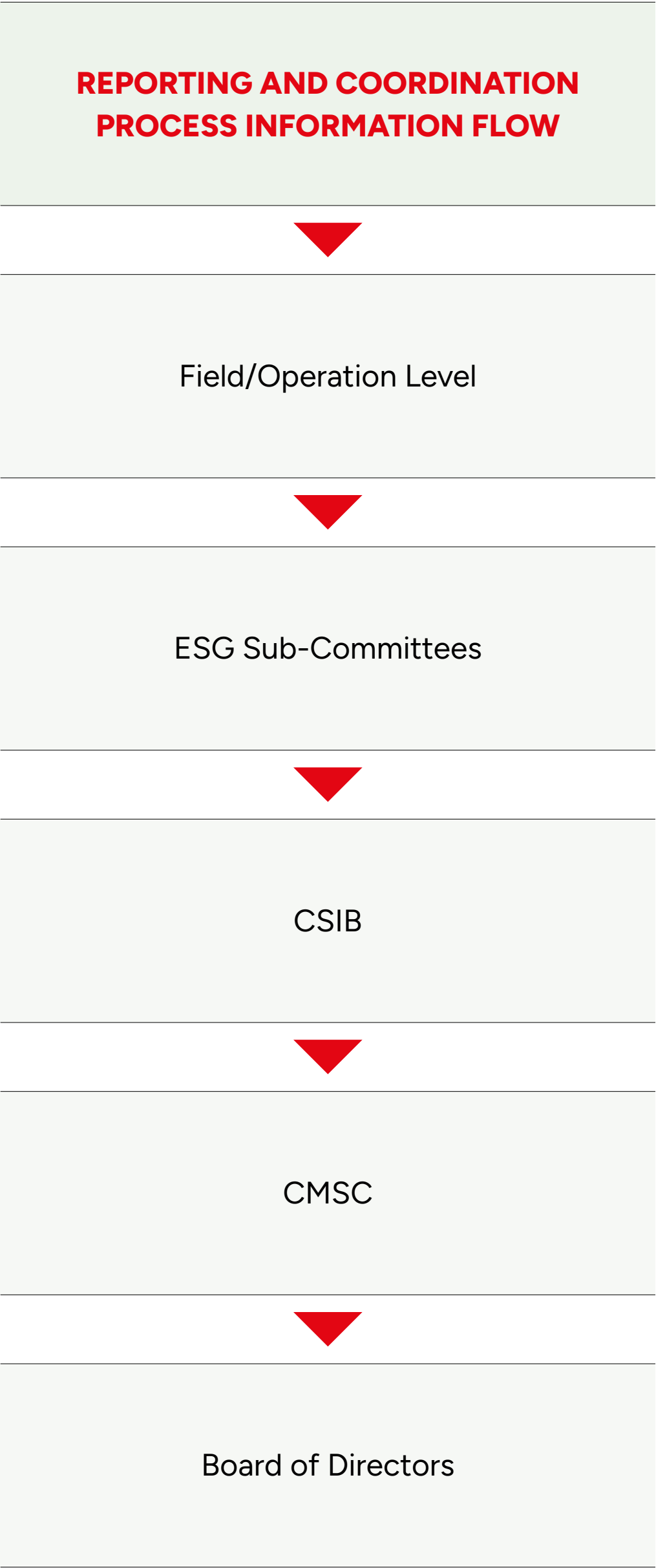
These specialty fields play a critical role in the assessment of strategies to respond to climate-related risks and opportunities. In case there is deficiency in the required specialty fields, training programs or outsourcing options are planned to be used. Obtaining training is planned to increase competencies as part of sustainability.

Competency assessments focus not only on individual skills, but also on corporate learning and development processes. In this context, the decisions taken in relation to sustainability strategies are analyzed periodically using outcomes and feedback from the operations of the operational teams; thus, continuous improvement is ensured for the capacity of responding to strategy on both individual and corporate levels.

This approach of Sarkuysan has the purpose of achieving sustainability of not only current skills, but also of corporate compliance competency against probable future climate scenarios.

OVERSIGHT AND REPORTING PROCESS

Works are ongoing regarding establishing infrastructure with the purpose of taking into account sustainability goals and strategies as well as risks and opportunities in relation to sustainability, particularly climate, while this process is planned to be significantly accelerated in 2026-2027 with the consultancy services to be purchased. As part of these works, plans include establishment of processes for reporting to the Board of Directors, processes for the sub-committees to report to the sustainability committee, and processes to structure a systematic and periodical documentation and information system to support sustainability strategies. In the structure to be established, Sustainability reporting and coordination process is envisaged to be conducted in line with the presented table.



INTEGRATING CLIMATE-RELATED RESPONSIBILITIES IN JOB DESCRIPTIONS AND POLICIES

Sarkuysan adopts a global approach in sustainability management, and in this context, the company has the purpose of integrating responsibilities related to risks and opportunities associated with climate change into the corporate structure through job descriptions and policies.

With the purpose of spreading climate-related responsibilities across the organization, there are ongoing works to clearly define the obligations associated with monitoring, assessing, and reporting sustainability risks and opportunities in the job descriptions of people who work under CSIS. Job profiles of the members of Committee and board under CSIS are expected to include expertise in environment, energy management, waste management, sustainability regulation, and similar fields; training processes are planned for members who do not have competence in these fields. When required, expertise gaps shall be supported using outsourced consultancy services.

Although remuneration policy of Sarkuysan does not take into account climate change and sustainability works, goals were set to initiate remuneration policy development works in this context in the medium-term plans.

Assessment of climate-related risks and opportunities is integrated into the strategic planning together with environmental and financial trade-offs by ensuring regular information flow to the corporate governance bodies.

PROCESS OF INFORMATION TO GOVERNANCE BODIES ABOUT CLIMATE-RELATED RISKS AND OPPORTUNITIES

Sarkuysan continues its works in line with the goal of establishing a systematic process that will ensure the information flow to the governance structure in order to manage climate-related risks and opportunities effectively. The Sustainability Committee is positioned as the main mechanism that ensures periodical information to be given to the relevant governance bodies. The purpose of CSIB and CMSC is for these to meet at least 4 times a year.

Works are ongoing to establish working, performance monitoring and reporting processes for committee and sub-committees.

ASSESSMENT OF TRADE-OFFS

Assessment of trade-offs in the decision processes related to climate shall be considered as a key implementation area in the CSIS structure to be established in the core of Sarkuysan. Gray Water and Solar Energy investments may be taken into account as an indication of the related efforts. Gray Water and Solar Energy investments provide cost benefits in the long-term by reducing dependency on water resources, although creating additional costs in the short-term. Similarly, energy efficiency investments with the goal to reduce carbon footprint both facilitate compliance with international regulations such as CBAM and provide competitive advantage in terms of energy costs. CSIS structure to be established has the goal to develop approaches in which short-term cost increases are balanced with long-term sustainable value creation by assessing these trade-offs not only in financial terms, but also in environmental and social terms.



STRATEGY



STRATEGY

Science-based goals were set for the future; sustainability vision was transformed into a long-term strategy and integrated into corporate policies through structures assessing environmental and economic impacts as a whole.

Sarkuysan considers climate change-related risks and opportunities as an integral part of strategic decision-making mechanisms. As a result of the ongoing works in the core of the company, the purpose is to establish a holistic structure in which the future or identified current impacts of climate-related risks and opportunities on financial competence shall be taken into consideration for long, medium and short-terms in determining management strategies.

Sarkuysan considers climate change not only as an environmental threat, but also a shaping factor in the new economic order. The industrial model of the future is based on low-carbon production, resource efficiency, and environmental resilience. Thus, our company designed its strategic approach for climate change in compliance with TSRS (Türkiye Sustainability Reporting Standards) and references recognized by international literature.



When analyzing sustainability risks and opportunities, Sarkuysan classifies time scales as presented below to identify when each impact is likely to occur:

- Short term: 0-3 years
- Medium term: 4-10 years
- Long term: More than 10 years

SUMMARY OF THE STRATEGIC APPROACH

The corporate goal is to accelerate transition to a low-carbon production model by establishing a measurable, verifiable, and sustainable performance system.

Accordingly:

- The goal is to reduce carbon concentration by 20% by 2030,
- To increase renewable energy’s share up to 50%,
- To achieve 75% in water recovery rate,
- To complete digital energy monitoring integration in all production lines.

A detailed “Transition Plan” shall be created by the end of 2026 with the purpose of achieving the above stated strategic goals, followed by the net zero emission level by 2053 for Sarkuysan. The Transition Plan to be created shall include below considerations as part of the works to be conducted for the reduction of operational and value chain emissions:

- Renewable energy utilization alternatives
- Energy efficiency projects
- Electric vehicle conversion alternatives
- Processes in supplier selection to ensure fulfillment of environmental criteria
- Circular economy practices
- Usage of Emission Trade System (ETS) to achieve goals
- Processes to set and monitor interim goals for key performance goals.



Sarkuysan’s climate strategy is shaped on four main axes, namely, reduction, compliance, innovation, and resilience. This approach is designed in line with the industry-based transformation frame featured in IPCC AR6 (2021), OECD Environmental Outlook (2022) and UNEP Emissions Gap Report (2023) reports. With the structure to be established, climate policies, to be dealt with at the level of the Board of Directors, are envisaged to be managed by the Sustainability Committee and Energy-Climate Sub-Committee. The structure to be established shall analyze financial impacts of climate risks, involving a governance mechanism compliant to TCFD (Task Force on Climate-related Financial Disclosures) principles. Carbon reduction goals, updated annually, energy concentration indicators, and scope 1-2 emission values shall be calculated in line with ISO 14064-1 standard and included in the strategic planning.

REDUCTION AND LOW CARBON ECONOMY STRATEGY

According to the data of IEA (International Energy Agency), industry sector creates 30% of the global GHG emissions and comes to the fore as the highest impact field in energy efficiency within this ratio. With this awareness, Sarkuysan put energy management to the center of its strategy. In this context, energy intensity reduction goals were identified, direct emission reduction was ensured through efficiency and process optimization projects, and utilization rates of renewable energy resources were targeted to be increased. In line with IEA Net Zero 2050 scenario, the Company has the goal to reduce its carbon intensity by 2030, and to achieve net zero emission level by 2053.

IPCC RCP SCENARIOS			
Scenario	Radiative Strain (W/m²)	2050 Average Temperature Rise (°C)	Definition
RCP 4.5	4.5	+2.1	Moderate scenario; carbon emissions stabilize after 2040.
RCP 8.5	8.5	+4.3	High emission; fossil fuel usage continues to increase.

COMPLIANCE, RISK AND OPPORTUNITY MANAGEMENT

Climate change is not only a process that requires reduction, but it also makes management of physical and transitional risks mandatory. Sarkuysan integrated these two main risk types, defined by World Report Institute (WRI), into its strategic planning. Physical risks: Rising temperatures, depletion of water resources, climate impacts on energy supply. Transitional risks: Carbon pricing, green supply criteria, financial market regulations. The impacts of these risks on production security, cost management, raw material supply, and market reach are analyzed, they also create new opportunity areas. Especially circular economy, waste recovery, water reutilization, and digital energy monitoring systems are considered as areas of opportunity that support environmental and economic sustainability.

SCIENCE-BASED GOALS AND FUTURE COMMITMENTS

Sarkuysan has the purpose of shaping its long-term strategy in compliance with SBTi (Science-Based Targets initiative) and EU Green Deal principles.

In this context, the process for determination of science-based emission reduction goals was initiated, carbon management criteria were developed for supply chain (Scope 3) emissions, green financing opportunities (ESG loans, carbon certificates, I-REC) were taken into consideration. Sarkuysan’s sustainability vision does not involve only managing today’s risks but also shaping tomorrow’s opportunities. This vision is fully compliant to IPCC’s 1.5°C scenario, UNEP’s 2030 goal frame, and OECD’s industrial transformation road maps.

SCENARIO ANALYSIS (IPCC RCP AND IEA NZE COMPLIANT)

Climate scenarios enable assessment of future risks and opportunities based on models. There are two main reference scenarios used in this analysis:

- IPCC-Representative Concentration Pathways (RCP)
- IEA-Net Zero Emissions by 2050 (NZE) scenario

These two frames enable us to model 2025-2050 period strategically by covering both physical climate change and energy transition dynamics.

IPCC RCP Scenarios-Physical Climate Change Projections
Representative Concentration Pathways (RCP) refers to the long-term climate modeling system of IPCC. Each RCP describes GHG concentration in the atmosphere and the relevant radiative strain level. Two critical scenarios were taken into account in this analysis:

According to IPCC AR6 and TÜBİTAK MRC modeling specific to Türkiye, in Marmara and Aegean regions, 20-30% reduction in precipitation amount, +2.6 °C (RCP 4.5) and +4.5 °C (RCP 8.5) increase in average temperatures, 2 to 3 weeks extension in summer drought period, and 10-15% increase in cooling water demand are expected. This situation makes water management a strategical consideration in the period after 2025.

IEA Net Zero Emissions by 2050 (NZE) Scenario-Energy Transition Frame
IEA NZE 2050 is a scenario in which International Energy Agency models net zero emission target by 2050. This model estimates energy supply-demand transformation, carbon pricing, and the share of renewables for the period between 2025-2050.

According to this scenario, carbon prices rapidly increase, thus fossil fuel-based energy production becomes more expensive while investments in renewables and energy efficiency projects create competitive advantage. The rise in green product demand (especially electric vehicle, cable, and conductor sectors) leads to an estimated 25% increase in copper demand.

Common Impacts of the Scenarios on the Period of 2025-2030

- 1. Rise of Physical Risks: Rising temperatures will increase water stress and cooling load.
- 2. Carbon Pricing Pressure: Export goods as part of CBAM are expected to experience rise in costs.
- 3. Renewable Energy Advantage: SPP investments will provide financial protection against the rise in electricity costs.
- 4. Demand for Low Carbon Products: Carbon neutral product condition in EU public procurements.
- 5. Financing Opportunities: Access to green loans and sustainable bonds will be facilitated for ESG-compliant businesses.

STRATEGIC OUTCOMES AND COMPLIANCE ACTIONS

The outcomes of the scenarios depend on the trio of increased resilience against physical risks (Adaptation), carbon management and low emission production (Mitigation), and integration into financial systems (Transition).

Sarkuysan A.Ş. initiated a global transformation process in 2024 in terms of sustainable production, energy management, water efficiency, and carbon

IEA NET ZERO EMISSIONS BY 2050 (NZE) SCENARIO				
Indicators	2024 Available	2025 NZE Scenario	2030 NZE Scenario	Reference/Note
Global Carbon Price (AB ETS/CBAM)	85 €/tCO ₂ e	110 €/tCO ₂ e	130 €/tCO ₂ e	EU ETS Outlook 2025
Electricity Demand Increase	-	+3.8%/year	+25% (by 2030)	IEA WEO 2023
Renewable Energy Share	15%	30%	50%	IEA NZE 2050
Natural Gas Consumption Change	-	-10%	-35%	IEA Net Zero Report
Energy Efficiency Gain	-	+4%/year	+25%	IEA 2024 Efficiency Outlook
2025-2030 SCENARIO SUMMARY				
Parameter	2024 Reference Value	2025 Scenario	2030 Goal	Reference
Average Temperature (Türkiye)	+1.8 °C	+2.1 °C	+2.6 °C	IPCC RCP 4.5
Precipitation Change (Marmara)	-10%	-18%	-25%	IPCC AR6
Carbon Price	85 €/tCO ₂ e	110 €/tCO ₂ e	130 €/tCO ₂ e	EU ETS / CBAM
Renewable Share	15%	30%	50%	IEA NZE 2050
Energy Efficiency Gain	-	+4%/year	+25% (total)	IEA Efficiency Outlook
Copper Demand	-	+25%	+50%	IEA Clean Energy 2024

reduction. In this context, the company conducted modernization works on the present systems and completed infrastructure preparations for the projects with 2025 goals.

In terms of energy efficiency, one of the key elements of our operational sustainability strategy, a total of 569 MWh/year energy savings were achieved as of 2024 by making efficiency-focused investments in lighting and cooling systems.

Renewable energy utilization, as one of the key elements of our energy transformation strategy, is materializing with the unlicensed Solar Power Plant (SPP) investment with an installed power of 14 MWp, which is planned to be put into operation in 2025. This investment, with the goal of increasing electricity production from sustainable resources, shall supply a significant part of electricity demand for our facilities from environmentally friendly resources. It is expected to supply approximately 25% of the total electricity consumption, with 22,000 MWh electricity production per year. Thanks to this, 22 million kWh clean energy will be produced, and nearly 8,800 tons CO₂e emissions will be prevented according to the estimations. This amount is equal to the carbon capture capacity of approximately 300,000 trees or annual electricity consumption of 7,300 households. With the operation of SPP, price stability will be ensured in energy costs in medium-term, carbon footprint reduction commitments will be supported, and ESG and TSRS reporting indicators will show a strong performance. Moreover, access to green financing, loans and incentives will be facilitated; energy independence of the Group will get significantly strengthened.

Another priority area of sustainability strategy is conservation of water resources and decreasing water stress. In this context, a water recovery project was designed for our facilities located in regions with high water stress, with the purpose of recovering treated water obtained from domestic wastewater facility to be used in industrial processes after being treated by advanced treatment processes. As part of the project, a ceramic ultrafiltration system with 99% efficiency will be installed at the first stage, followed by a reverse osmosis (RO) unit, to make water quality compliant to industrial standards.

When full operational capacity is reached, dependency on municipal water will decrease by 80%, production continuity will be ensured during drought periods, and high-performance scores will be obtained in TSRS and CDP Water indicators. Moreover, the pressure on local water resources will ease off, and contribution will be made in environmental sustainability and protection of natural ecosystems.

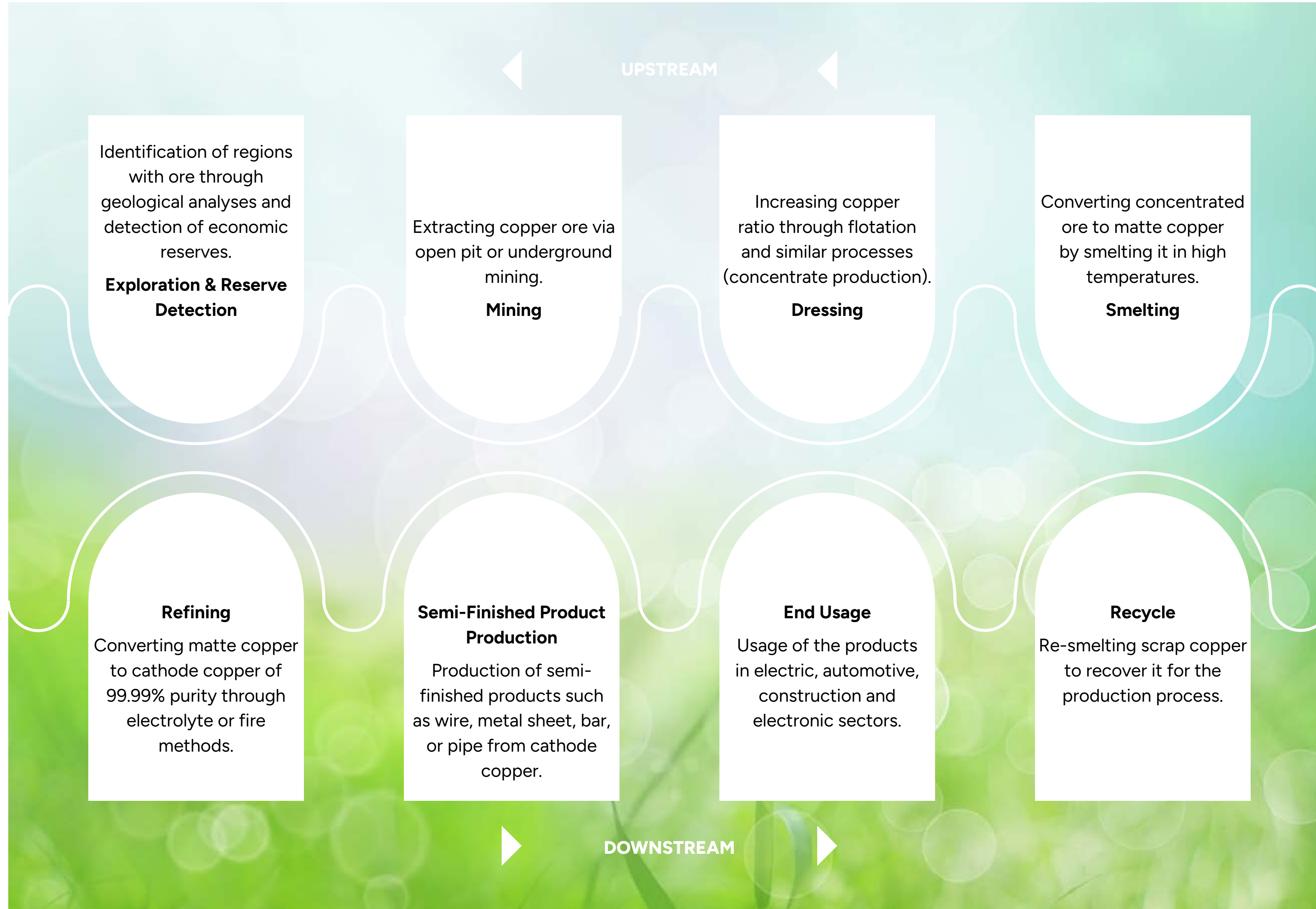
These investments, implemented and planned in the period of 2024-2025, are directly in harmony with our company's goals of reducing carbon and water footprint, increasing resource efficiency, strengthening circular economy practices, and increasing climate resilience. Based on a global approach in energy and water management, these projects consolidate sustainability performance while advancing in line with the low carbon development goals of Türkiye.

CLIMATE-RELATED RISKS AND OPPORTUNITIES EXPECTED TO AFFECT FINANCIAL COMPETENCY IN FUTURE AND IN CURRENT SITUATION

Sarkuysan analyzes the risks and opportunities in a systematic manner by accepting physical, transitional, and regulatory risks originating from climate change may have an impact on the future financial performance of the business. These analyses are conducted according to the Sustainability Risk and Opportunity Assessment Procedure; they are scored and prioritized by impact and probability and integrated in the financial planning processes.

Sarkuysan's main production facility is located within the borders of Kocaeli province, majority of activities being concentrated in this region. This situation leads to climate-related risks and opportunities also being concentrated at this facility and in this geographical region. The assessment of this geographical region and facility included operational processes and assets while the focus was on raw material supply chain, wastewater treatment facility, and water supply as well as energy systems.

Risks and opportunities are assessed together with impact potential in risk priority matrix, and the goals corresponding to the relevant period are being monitored through Sustainability Target Tracking Table.



The value chain of copper sector comprises of processes of extraction of copper ore following exploration and surveys upstream, and processing, refining the ore and producing the demanded product for the end market downstream. Sarkuysan's upstream value chain comprises of including copper anode and cathode into the core of the business. And downstream, it comprises of processing, refining, and producing the required product to meet the demands of the sector in line with the needs. Sarkuysan analyzes sustainability-related physical and transitional risks-opportunities from a short, medium and long term perspective in scope of facility, operation, and asset types, and puts forward the current and predicted impacts on the value chain stages of Business Processes (Copper and Electricity and Steam Generation, Internal Logistics) Upstream Processes (Supply and Logistics Management) and Downstream Processes (Sales, Marketing and Logistics). This structure has the purpose of systematically analyzing how risks and opportunities emerge in the time aspect as part of TSRS 1, and the current and potential impacts of these on business processes and shareholders of the company.

RISKS & OPPORTUNITIES

Climate change brings with it both physical and transitional risks that can have a direct impact on industrial production. Sarkuysan manages these risks through an early warning-prevention-adaptation approach. Risk analyses are supported by data obtained from environmental data monitoring systems (SCADA, meteorological sensors, water analyses) and climate projections obtained from international sources such as IPCC, WRI, UN Environment Programme (UNEP).

Physical Risks

Physical risks involve operational threats emerging directly as a result of climate impacts. For Sarkuysan, priority physical risks are as follows:

- **Water Stress and Drought Risk:** Decreasing regional water resources can have an impact on the continuity of process cooling systems and production planning. To counter this, gray water and reverse osmosis (RO) systems are used to increase water recovery capacity.
- **Extreme Heat and Rise in Energy Demand:** During the periods of extreme heat, energy consumption may increase, and equipment efficiency may decrease. This risk is reduced through thermal insulation, automated monitoring, and energy efficiency projects.
- **Excessive Precipitation and Flooding Risk:** Heavy rainfall may create a risk on infrastructure and electrical systems. Engineering measures are taken such as consolidation of drainage systems and transformer insulation.

Transitional Risks

Transitional risks originate from the changes in regulations, markets, and financial conditions in the process of transitioning to carbon economy.

- **Carbon Pricing and Emission Taxes:** National or regional carbon regulations may lead to increases in natural gas and electricity costs. Sarkuysan has the goal to mitigate this risk through energy efficiency projects, waste heat recovery, and renewable energy investments.
- **Green Supply Chain Pressure:** In line with the EU Green Deal and SBTi standards, customers and import markets demand the carbon data for supply chains. In this context, supplier firms are required to state their carbon data and Scope 3 emission management process has started.
- **Financial and Reputational Risk:** Weakness in ESG (Environment, Social, Governance) performance may influence the conditions to access financing and market perception. This risk is managed through transparent reporting, international certifications (ISO 14064, I-REC), and sustainable financing tools.

Climate-Related Opportunities

Climate change brings with it not only risks but also strategic opportunity areas. Sarkuysan has the goal to convert this transformation into a competitive advantage in innovation, resource efficiency, and green energy areas.

- **Energy Efficiency and Low Carbon Technologies:** With the conversion of equipment used in energy-intensive processes to high-efficiency models, energy saving and emission reduction are achieved simultaneously.
- **Use of Renewable Energy:** The goal is to achieve direct renewable electricity generation by solar power plants (SPP) to be installed at the factory site.
- **Circular Economy and Water Recovery:** Recovery of waste heat, recovery of process water and usage of RO concentrates provide environmental and economic benefits.
- **Green Financing and ESG Performance:** The opportunities for green loans from national and international finance institutions and carbon certificates are considered for sustainability projects.
- **Digital Energy Management:** Production planning is optimized using data obtained from SCADA and energy monitoring systems, thus reduction is enabled in both costs and carbon amounts.

RISK ASSESSMENT ANALYSIS	
CBAM Compliance Risk	
Nature of the Risk	Transitional Risk
Critical Description	Carbon regulations of the European Union, particularly Carbon Border Adjustment Mechanism (CBAM), are transforming international trade dynamics. Policy changes that would weaken competitive advantage of carbon-intense products in exportation do not only increase costs, but they also function as a factor that re-shape production processes. In OECD, 2022 and IPCC, 2021 reports, it is emphasized that CBAM creates a significant cost pressure, especially in energy-intense sectors. Failing to comply may lead to losses in market share.
Position in the Value Chain	Downstream
Focus Subjects	Carbon measurement, sustainable reporting through reporting standards, low carbon production
Fragile Processes	Energy-intense production processes and exportation focused activities.
Expected Impacts	Rise in costs, shrinkage in market share, damage to customer and investor trust.
Economic Repercussions	Shrinkage in profit margin and decrease in exportation revenues due to price fluctuations in carbon markets.
Projected Period	Medium Term
Significance Level	Medium-High
Strategic Trend	Transitioning to green energy, establishment of reporting systems and sustainable supply chain management.
Areas of Uncertainty	Constant change in the EU carbon pricing mechanisms and noncompliance in reporting criteria
Applicable Measures	Strengthening carbon footprint calculation infrastructure, investing in low carbon technologies, ensuring compliance with international reporting standards
Investment and Compliance Cost	High level financial resources; long-term consultancy and reporting costs, medium-long term energy investments.

RISK ASSESSMENT ANALYSIS	
Water Scarcity and Drought Risk	
Nature of the Risk	Physical Risk
Critical Description	Climate change related to water scarcity is one of the most important risks that threaten operational continuity for industrial organizations. As indicated in UNEP and WRI reports as well, global water demand is envisaged to exceed water supply in the period after 2030. This condition will increase fragility of water-dependent processes. Increased water stress threatens both operational continuity and social security.
Position in the Value Chain	Affects upstream at high level, company operations at medium level, and downstream at low level.
Focus Subjects	Water efficiency, recovery technologies, access to alternative resources
Fragile Processes	Water-dependent industrial activities and supporting auxiliary systems.
Expected Impacts	Interrupted production, cost increase, weakening stakeholder trust.
Economic Repercussions	Rise in unit prices of supplied water, long term capacity losses.
Projected Period	Long Term
Significance Level	High
Strategic Trend	Strengthening water management systems and increasing recovery investments.
Areas of Uncertainty	Unpredictable regional precipitation regimes and estimations of drought periods.
Applicable Measures	Wastewater recovery projects, water efficiency technologies, international cooperations.
Investment and Compliance Cost	Medium-high; infrastructure investments, additional investment costs for water technologies.

RISK ASSESSMENT ANALYSIS	
Excessive Heat Risk	
Nature of the Risk	Physical Risk
Critical Description	Rising heat waves have negative impacts on occupational health and safety as well as on energy demand and operational efficiency. According to the 6th Assessment Report of IPCC, the frequency and severity of heat waves will double by 2050.
Focus Subjects	Occupational safety, air conditioning, energy efficiency.
Position in the Value Chain	Affects upstream at high level, company operations at medium level, and downstream at low level.
Fragile Processes	All heat-sensitive operations and logistic activities.
Expected Impacts	Rise in energy demand, decrease in efficiency, rise in health risks.
Economic Repercussions	Rise in energy costs, increase in maintenance and health care expenses.
Projected Period	Medium Term
Significance Level	Medium-High
Strategic Trend	Heat Insulation, innovative air conditioning systems, flexible work plans.
Areas of Uncertainty	Unpredictability of regional heat waves
Applicable Measures	Measures to protect employee health, energy-efficient cooling systems, optimizing shift plans.
Investment and Compliance Cost	Medium; investment in air conditioning systems, operational expenses for health and occupational safety.

RISK ASSESSMENT ANALYSIS	
Flooding and Overflowing Risk	
Nature of the Risk	Physical Risk
Critical Description	Increases in heavy and sudden rainfall threaten facility infrastructure and logistic processes. According to data from the World Bank (2020), economic losses originating from flooding increase every year. This situation makes infrastructure resilience of businesses critical.
Position in the Value Chain	Affects upstream at high level, company operations at medium level, and downstream at low level.
Focus Subjects	Infrastructure security, logistic continuity, emergency plans/disaster management.
Fragile Processes	Storage sites, transportation lines, critical operational facilities.
Expected Impacts	Interrupted production, cost increase, weakening stakeholder trust.
Economic Repercussions	Production losses, disruption in logistics, infrastructure damages.
Projected Period	Short-Medium Term
Significance Level	Medium
Strategic Trend	Strengthening infrastructure, early warning systems, emergency plans/disaster management
Areas of Uncertainty	Uncertainty in precipitation frequency and severity.
Applicable Measures	Improving drainage and water discharge systems, emergency drills for disaster scenarios, expanding insurance coverages.
Investment and Compliance Cost	Medium; infrastructure strengthening and insurance premium costs.

RISK ASSESSMENT ANALYSIS	
Technological Risk	
Nature of the Risk	Technological Risk
Critical Description	Rapid spreading of low carbon technologies create competition risk for those companies which cannot adapt. According to the IEA (2021) report, next generation energy efficiency technologies will become a common standard in industrial sector by 2030.
Position in the Value Chain	Affects downstream at high level, company operations at medium level, and upstream at low level.
Focus Subjects	Energy efficiency technologies, digitization, green innovation.
Fragile Processes	Production lines, energy management systems, technological infrastructures.
Expected Impacts	Loss in competitive power, difficulty in market access
Economic Repercussions	High investment costs, long-term losses due to technological gaps.
Projected Period	Medium-Long Term
Significance Level	Medium
Strategic Trend	R&D investments, digitization and international cooperations.
Areas of Uncertainty	Unpredictability in the speed of technological development.
Applicable Measures	Unpredictability in the speed of technological development.
Investment and Compliance Cost	Investing in R&D projects, university-industry cooperations, strengthening digitization infrastructure.

MAKING USE OF OPPORTUNITY ANALYSIS	
Increasing Usage of Renewable Energy Resources	
Description of Opportunity	As part of compliance with carbon neutral goals, Solar Power Plant (SPP) investments are planned on factory roofs and suitable areas with the purpose of reducing Scope 2 emissions originating from electricity consumption. This project decreases the risk of foreign-dependent energy supply, reduces carbon intensity, and ensures long term stability in energy costs. Moreover, renewable energy consumption will be officially documented with green energy certification (I-REC), thus “green supplier” status will be strengthened before customers and exportation markets.
Time Frame	Short-Medium Term
Position in the Value Chain	Affects downstream at high level, company operations at medium level, and upstream at low level.
Influence Level	High
Strategy of the Business and Impacts on Decision Making Mechanism	The goal of increasing renewable energy share is integrated into the KPIs in the Energy Management Strategy. Technical feasibility works for SPP investments are conducted by Committees, and decisions are made at the level of the Board of Directors.
Branches Sensitive to Opportunity	R&D, Energy and Infrastructure Management, Finance, Procurement Departments
Impacts of the Opportunity	Supplying for 25% of electricity consumption from renewable resources, reduction to ~8.800 tCO ₂ e per year, rise in ESG scores, stabilizing energy costs in the long term
Areas of Uncertainty	Fluctuations in electricity prices and uncertainties in the estimations of sunshine duration may affect return on investment period.
Applicable Measures	Installation of 14 MWp SPP, I-REC certification, Renewable ratio KPI tracking
Investment and Compliance Cost	High; technology investments and R&D funds.

MAKING USE OF OPPORTUNITY ANALYSIS	
Expanding Gray Water Recovery Systems	
Description of Opportunity	Grey water recovery systems will be put into operation due to increasing water stress and wastewater discharge costs. This the new facility, it is planned to recover 500 m³ water per day, thus reducing dependency on municipal water and ensuring production continuity.
Time Frame	Short-Medium Term
Position in the Value Chain	Affects upstream at high level, company operations at medium level, and downstream at low level.
Influence Level	High
Strategy of the Business and Impacts on Decision Making Mechanism	Water management strategy has become a priority criterion in production planning and environmental investment decisions. In technical projects, water recovery ratio is monitored s KPI.
Branches Sensitive to Opportunity	Wastewater Treatment, Maintenance-Repair, Environmental Management and Energy Departments
Impacts of the Opportunity	80% reduction in municipal water consumption, 120 tCO₂e/year indirect emission reduction, increase in production security
Areas of Uncertainty	Changes in water quality and chemical composition may create differences in the system efficiency.
Applicable Measures	Gray water line’s integration to process line, re-utilization of RO wastewater, water monitoring sensors’ SCADA integration
Investment and Compliance Cost	High; technology investments and R&D funds.

KEY PRACTICES INCREASING CLIMATE RESILIENCE

- **Water Resources Management:** In the face of drought risk, which is expected to increase according to climate scenarios, infrastructure investments were made to increase usage of recovered water in production.
- **Energy Efficiency and Carbon Concentration Reduction:** Low energy consuming equipment investments and system optimizations are used to reduce energy-related emission risks.
- **Resilience in Supply Chain:** Environmental performance of suppliers is monitored, and the ratio of high-risk suppliers in terms of sustainability is reduced in the portfolio. Alternative supply sources are analyzed based on scenario and diversification plans are created.
- **Product Portfolio and Market Flexibility:** Developing products compliant to the EU regulations (for example, CBAM, EUDR, PPWR) with product groups with low carbon footprints ensures portfolio adaptation against strategic market losses.

CURRENT AND PREDICTED IMPACTS OF CLIMATE-RELATED RISKS AND OPPORTUNITIES ON BUSINESS MODEL AND VALUE CHAIN

Sarkuysan’s business model is based on electrolyte copper products, copper pipe and copper metal sheet production processes originating from copper raw material resources, and the Company manufactures a significant part of the machinery and facilities used in production while also owning cogeneration facilities to generate electricity energy and steam which are critical for production security. This structure is directly related to the impacts originating from climate change. The impacts of climate-related risks and opportunities on the business model are revealed in various topics, such as production continuity, cost structure, regulation compliance, and market access. Climate change can have an impact on the supplying processes of raw materials originating from both supply and regulations.

Across value chain, there are impacts of climate risks and opportunities in terms of raw material procurement, logistics, supplier relations, and end user expectations.

Sarkuysan’s production activities are heavily dependent on resources such as water and energy. Drought and precipitation instability that will increase in the region according to RCP 4.5 and 8.5 scenario create uncertainty in underground water supply, and this can create risks for production capacity. Although advanced wastewater treatment applications developed against water scarcity bring cost burden in the short term, they also ensure long

term operational sustainability.

On the other hand, energy efficiency projects and transitioning to renewable energy in long term reduce carbon intensity of production process; and this provides a strategic advantage in terms of operational costs as well as carbon regulations.

Applications such as the Eu’s Carbon Border Adjustment Mechanism (CBAM) necessitate structural transformations that can affect exportation potential of the products in long term.

In this context, development of environmentally friendly products and a product life cycle management compliant to circular economy principles turn into a competitive advantage that support diversification in the market and customer loyalty.

In order to manage the above-described impacts, Sarkuysan adopts a restructuring approach in its business model and value chain based on sustainability criteria.

Accordingly:

- All suppliers are being assessed according to certain environmental and social compliance criteria
- Recovery rates are being increased in the production processes
- Product contents and process designs are being reviewed to ensure compliance with regulations

Thanks to this structure, the company’s value creating capacity is protected against the uncertainties that climate change can create, and a resilient system is established on the basis of sustainable growth principle.

ADAPTATION AND FLEXIBILITY AGAINST UNCERTAINTIES

Against uncertainties for future in relation to the climate (for example, carbon prices, speed and scope of regulations, consumer preferences), in-house decision-making processes are supported by flexible planning, annual target revision mechanisms, and a committee-based monitoring system. Sustainability Committee monitors scenario analyses and projects implemented against climate impacts biannually, and it has the authority to suggest strategy updates in the face of critical developments.

INTEGRATION OF CLIMATE-RELATED RISKS AND OPPORTUNITIES INTO GENERAL RISK MANAGEMENT PROCESSES

Sarkuysan considers climate-related risks and opportunities not only from a sustainability perspective, but also in the frame of corporate risk management. Sustainability Risk and Opportunity Assessment Procedure, created by the Company, ensures a systematic integration, and guarantees that climate-related considerations are directly reflected on the company’s general risk perception and decision-making processes.

The process of identification, assessment and prioritization of risks and opportunities is conducted annually through an integrated effort. In this process, all activities of the Group and physical sites are analyzed first, followed by identification of risk and opportunity elements by taking into account critical environmental inputs (water, energy, raw material), regional climate data and regulatory requirements. Each defined element is scored using 3x3 probability and impact matrix, and the elements with a risk score of 4 or above are prioritized to be subjected to detailed action plans. The realization probability of the risk is determined through short-, medium- and long-term time perspectives while impact level is calculated based on the financial impact on the company’s turnover and reputation management.

Thanks to this structure, climate-related risks and opportunities are completely integrated into the general risk management system of the company; thus, sustainability of not only environmental compliance, but also financial and operational stability is ensured.

INPUTS AND PARAMETERS USED IN IDENTIFICATION OF CLIMATE-RELATED RISKS

Sarkuysan conducts a comprehensive assessment in identifying climate-related risks, including both operational and environmental data. Inputs and parameters used as part of this assessment are production volume, energy consumption, water usage, emission levels, raw material procurement conditions, supplier and customer relations, carbon footprint results, regulatory compliance requirement, and international climate scenarios. In the risk identification process, IPCC’s RCP 4.5 and 8.5 scenarios are taken as the key references; according to this, physical impacts such as temperature increase, drought trends, and flooding risks are taken into consideration alongside other analyses specific to the geographical location of the business.

“Impact level,” as one of the parameters used in risk assessment, is associated with the monetary threshold values specified according to the annual turnover of Sarkuysan. In this context, the turnover impact of a disruption that may occur, for example, in production activities, is directly calculated and this impact is entered into the 3x3 probability-impact matrix. For the probability parameter, the risk is classified according to its likelihood to happen in short-, medium-, or long-term, and sectoral trends, historical climate data and regulatory developments are taken into account for this assessment.

Carbon footprint measurement results play a significant role among the inputs used by Sarkuysan. In the emission inventory prepared for 2024, Scope 1 and Scope 2 emissions have been calculated in detail; this data was used as a direct input in both determination of current carbon costs and assessment of potential pricing impacts.

When assessing supply risks, the impact of events, especially such as floods, hot weather wave, and drought, on raw material availability was analyzed. And on the side of energy, carbon concentration ratios were calculated using quantitative inputs such as natural gas consumption and electricity consumption; and potential costs originating from carbon tax or emission trade were modeled.

All these inputs are updated annually and assessed by the sustainability committee; the relation of risks with the business model, financial structure and long-term corporate goals is analyzed to prioritize them. Identification of climate risks through this structure is considered not only as a technical analysis, but also as a financial and strategic planning process.

RISK MANAGEMENT



RISK MANAGEMENT

Risks and opportunities related to climate change are analyzed through a matrix system based on probability and impact, and these are then integrated into the prioritization process.

Risk and opportunity assessment process at Sarkuysan is not limited to sustainability units, it is conducted with the contributions of various internal departments. Technical teams responsible for environmental inputs such as water management, energy management and raw material procurement, work in cooperation with other functional departments such as human resources, production, procurement, and financial affairs.

Thanks to this global approach, Sarkuysan conducts controls on climate-related risks and opportunities in a manner integrated with different functional units of the organization and ensures a healthy information flow at the governance level.

Risk-Opportunity Identification and Rating

Sarkuysan considers risks and opportunities related to climate change as elements that can have a direct impact on its future financial competency. In this context, the elements that can threaten or support sustainability goals are analyzed as part of the Sustainability Risk and Opportunity Assessment Procedure.

This procedure is conducted with the purpose of assessing the impacts of environmental, social, and economic risks that can emerge due to climate change on the corporate activities as well as establishing structures that enable turning these risks into opportunities. The process involves a systematic assessment which takes into account analyses based on climate scenarios, regional environmental data, and critical resource usage (water, energy, raw material).

Outputs of the assessment are transferred into a Risk/Opportunity table, following a probability and impact-based scoring system, and this table is integrated in the management’s decision support mechanisms.

In Identification of Risks and Opportunities;

- 1. Analyzing processes
- 2. Identifying critical environmental inputs (water, energy, raw material)
- 3. Reviewing regional environmental data
- 4. Reviewing Climate Scenarios
- 5. Evaluating the social and economic regional impacts of climate change together with supply chain
- 6. Scoring according to Probability x Impact matrix
- 7. Prioritizing and creating action plan

are the steps to follow.

RCP 8.5 and RCP 4.5 scenarios have been taken into account when creating climate scenarios for Sarkuysan.



Climate scenarios are used to evaluate the potential impacts of climate change depending on the future GHG emissions. Representative Concentration Pathways (RCPs), published by IPPC taking into account Paris climate change agreement, represent different GHG emission scenarios and are used to help us predict the impacts of these scenarios on water availability, energy demand, and raw material procurement.

For Sector Based Risks and Opportunities, TSRS 2’s sector based “Volume 10: Metals and Mining” was used.

Sector Based Risk/Opportunity Parameters:

- GHG emissions
- Energy management
- Water management



Risk-Opportunity Assessment Matrix

Assessments for Risk-Opportunity rating and prioritizing are conducted using 3x3 matrix based on probability and impact factors; risks and opportunities are included in the prioritization process after being scored in terms of their temporal aspect (short, medium, long) and their potential financial impacts.

The realization probability of the risks is rated on a scale from 1 to 3; this value represents the probability of the risk occurring in short, medium, or long term. For example, the risks that are expected to occur in short term are rated with a value of “3” and this indicates that the relevant risk has a high level of urgency. And the impact level is rated on a scale from 1 to 3, calculated taking into account the financial impact, reputational impact, and operational impacts. The financial impact is proportioned to total turnover; impacts between 0-0.25% are rated as “1”, impacts between 0.26-1% are rated as “2” and impacts over 1% or the ones that can create significant reputation loss are rated “3”, thus impact significance is determined.

Sarkuysan does not only measure the significance of risks, but the company also details in which geographical area, which process or value chain ring the risk will have an impact. Thanks to this, the risks are managed by segregating their quantitative and qualitative impacts on a process basis. Through this explained approach, the risk score obtained via probability and impact factors is assessed together with whether it presents a “significant reputation risk,” and an action plan is prepared for all risks and opportunities with a total score of 4 and above. And elements with a risk score of 3 and below are reviewed once again especially to see whether they include factors that can have an impact on sectoral reputation.

Probability: Rating is given 1 to 3.

PROBABILITY (Realization likelihood of the risk/opportunity)	
1	Likely-Long Term
2	Likely-Medium Term
3	Likely-Short Term

- Short Term: 0-4 years
- Medium Term: 4 years - 10 years
- Long Term: > 10 years

Impact: Rating is given 1 to 3.

IMPACT	
1	Effect of the financial impact on total turnover between 0% and 0.25%,
2	Effect of the financial impact on total turnover between 0.26% and 1%,
3	Effect of the financial impact on total turnover is above 1%, Reputation Loss Risk or Opportunity,

RISK SCORE			
Impact/Opportunity	1	2	3
1	1	2	3
2	2	4	6
3	3	6	9

METRICS AND GOALS



METRICS AND GOALS

EMISSION MANAGEMENT

Sarkuysan considers GHG emissions originating from its production activities as a critical responsibility area in tackling climate change. Emission management is not only an environmental obligation, but also a key element in financial resilience and competitive advantage. As per IPCC 2006 methodology and ISO 14064-1 standard, Sarkuysan’s 2024 Scope 1 (direct), Scope 2 (indirect) emissions are as below.

	Scope 1	Scope 2	Total
Sarkuysan Kocaeli Plants (tCO2e)	41,690	30,407	72,098
Sarkuysan Other Plants (tCO2e)	182	4,039	4,221
Affiliated Company Sar Makine (tCO2e)	272	918	1,190
Sarkuysan Other Affiliated Companies (tCO2e)	1,278	16,056	17,333
Gross Total (tCO2e)	43,422	51,421	94,842

In relation to emission calculations, there is no 3rd party verification other than the auditor.

Additional metrics as part of Sector based Metrics “Volume 10: Metals and Mining”:

Metric	Category	Measurement Unit	Code	Definition
Gross total Scope 1 emissions, percentage as part of emission limiting regulations	Quantitative	Metric ton (t) CO Percent (%) 2-e,	EM-MM-110a.1	Gross total Scope 1 emission: 43,422 tons CO2e Percentage as part of emission limiting regulations: 0%
Analysis of performance towards these goals, to negotiate long and short-term strategy or plan in order to manage emission reduction goals related to Scope 1 emissions	Negotiation and Analysis	N/A	EM-MM-110a.2	Sarkuysan has goals to achieve net zero emission target by 2053. Technological improvement works are being conducted to reduce energy consumption and low carbon production applications are being developed. The target is 20% renewable usage by the end of 2025 with SPP investment, and 60% renewable usage by the end of 2030 with the additional investments. Actions required in the period of transitioning to low carbon economy are being planned, projects that will reduce energy consumption and decrease carbon footprint are prioritized.

ENERGY MANAGEMENT

Energy management is at the center of the climate strategy of Sarkuysan. The Group monitors all energy inputs and regularly reports its energy performance. The goal is to transition to carbon neutral state in the long term through energy efficiency, renewable energy investments, and digital monitoring applications.

Total Energy Consumption	
Sarkuysan Kocaeli Plants (GJ)	1,101,279
Sarkuysan Other Plants (GJ)	36,911
Affiliated Company Sar Makina (GJ)	8,206
Sarkuysan Other Affiliated Companies (GJ)	147,578
Gross Total (GJ)	1,293,974

Additional metrics as part of Sector based Metrics “Volume 10: Metals and Mining”:

Issue	Metric	Category	Measurement Unit	Code	Definition
Energy management	(1) Total consumed energy, (2) Mains electricity percentage and (3) Renewable energy percentage	Quantitative	Gigajoule (GJ), Percentage (%)	EM-MM-130a.1	(1) Total consumed energy: 1,293,974 GJ (2) Mains electricity percentage: 99.8% (3) Renewable energy percentage: 0.2%

WATER MANAGEMENT

Water management strategy has become a priority criterion in production planning and environmental investment decisions. In technical projects, water recovery ratio is monitored s KPI.

Total Drawn Water Amount	
Sarkuysan Kocaeli Plants (1000 m3)	115
Sarkuysan Other Plants (1000 m3)	3
Affiliated Company Sar Makina (1000 m3)	4
Sarkuysan Other Affiliated Companies (1000 m3)	39
Gross Total	161

Additional metrics as part of Sector based Metrics “Volume 10: Metals and Mining”:

Issue	Metric	Category	Measurement Unit	Code	Definition
Water Management	(1) Total drawn water, (2) Total consumed water; percentage of each one in regions with High or Extremely High Water Stress	Quantitative	A thousand cubic meter (m³), Percentage (%)	EM-RM-140a.1	(1) Total Drawn Water Amount = 161X 1000 m3 (2) Ratio of Drawn Water Amount to Total Amount in Regions with High Water Stress: 100%
	Number of noncompliance events related to water quality permissions, standards, and regulations	Quantitative	Number	EM-MM-140a.2	Number of non-compliances: 0

ACTIVITY METRICS

Deemed as sensitive information by the Group Management and not reported.

INDEPENDENT AUDITOR'S REPORT



INDEPENDENT AUDITOR’S REPORT

1) TO THE GENERAL ASSEMBLY OF SARKUYSAN ELEKTROLİTİK BAKIR SANAYİ VE TİCARET ANONİM ŞİRKETİ;

We have undertaken limited assurance engagement of Sarkuysan Elektrolitik Bakır Sanayi ve Ticaret Anonim Şirketi and its affiliated companies (“all together to be referred to as the “Group””) about the information (“Sustainability Disclosure”) presented in compliance with Türkiye Sustainability Reporting Standards 1 “General Provisions Regarding Disclosure of Financial Information Related to Sustainability” and Türkiye Sustainability Reporting Standards 2 “Disclosures Related to Climate” belonging to the year ending on the date of December 31, 2024.

Our assurance engagement does not cover information related to the previous periods and other information associated with Sustainability Disclosure (including any kind of picture, audio file, website links, or embedded videos).

2) OUTCOME OF LIMITED ASSURANCE

Based on the procedures conducted by us as described under the heading of “Summary of the Work Conducted As a Basis for Assurance Outcome” and the evidence we obtained, there has been no point that stood out to us that led us to believe that the Sustainability Disclosure of the Group belonging to the year ending on the date of December 31, 2024 had not been prepared in accordance with Türkiye Sustainability Reporting Standards (“TSRS”) issued by Public Oversight, Accounting and Auditing Standards Authority (“KGK”) in any of its important aspects

3) POINTS TO CONSIDER

As explained in the About Report section of the Sustainability Report compliant to TSRS, the TSRS compliant Sustainability Report of the Group prepared for 2024 is the first report prepared as part of TSRS, and this report is limited only with disclosing information associated with climate-related risks and opportunities by taking into account the exclusions provided by TSRS 1, and there is no comparative information presented belonging to the previous period. However, this point does not have an impact on the conclusion provided by us.

As explained in the About the Report section of the Sustainability Report compliant to TSRS, the Group benefited from the exclusion of not disclosing Scope 3 GHG emissions which is valid for the first two years as per Temporary Article 3 Board Decision related to “Türkiye Sustainability Reporting Standards (TSRS)” Application scope published in Official Gazette dated December 29, 2023 and numbered 32414. For this reason, as TSRS Compliant Sustainability Report is the first TSRS compliant sustainability report of the Group prepared according to TSRS, Scope 3 GHG emissions have not been disclosed. However, this point does not have an impact on the conclusion provided by us.

4) STRUCTURAL LIMITATIONS IN PREPARING SUSTAINABILITY DISCLOSURE

Sustainability Disclosure is subject to some structural uncertainties originating from lack of scientific and economic knowledge. Inadequacy of scientific knowledge in calculation of GHG emissions leads to uncertainties.

Furthermore, due to lack of data in relation to the probability, timing and impacts of future potential physical and transitional climate risks, Sustainability Disclosure includes uncertainties based on climate-related scenarios.

5) RESPONSIBILITIES OF MANAGEMENT AND PEOPLE RESPONSIBLE FOR SENIOR MANAGEMENT IN RELATION TO SUSTAINABILITY DISCLOSURE

The Group Management is responsible for the following:

- Preparing Sustainability Disclosure in accordance with the rules of Türkiye Sustainability Reporting Standards,
- Designing, implementing, and maintaining internal control related to the preparation of Sustainability Disclosure which shall not include significant errors originating from fault or fraud,
- The Group Management is also responsible for selecting and implementing suitable sustainability reporting methods as well as putting forward reasonable hypotheses and predictions which comply with the conditions.

People Responsible for Senior Management are responsible for oversight of the Group’s sustainability reporting process.

6) INDEPENDENT AUDITOR’S RESPONSIBILITY REGARDING LIMITED ASSURANCE ENGAGEMENT OF SUSTAINABILITY DISCLOSURE

We are responsible for the following:

- Planning and conducting assurance efforts in order to obtain a limited assurance about whether Sustainability Disclosure contains significant errors originating from fault or fraud,
- Reaching an independent conclusion based on the evidence we obtain and procedures we conduct and reporting our conclusion to the Group management.
- As we are responsible for reporting an independent conclusion about the Sustainability Disclosure prepared by the management, we are not allowed to be involved in the preparation process of Sustainability Disclosure in the name of not compromising our independence.

7) IMPLEMENTING PROFESSIONAL STANDARDS

We have conducted limited assurance engagement in accordance with Assurance Engagement Standard “3410 Assurance Engagements on Greenhouse Gas Statements” in relation to GHG emissions contained in the Sustainability Disclosure and Assurance Engagement Standard 3000 “Assurance Engagements Other Than Independent Engagement or Limited Independent Engagement of Historical Financial Disclosures” published by KGK.

8) INDEPENDENCE AND QUALITY CONTROL

We have acted in accordance with the independence provisions and other ethical provisions contained in the Ethical Rules for Independent Auditors (Including Independence Standards) which have been published by KGK and have been based on integrity, objectivity, professional competence and care, secret keeping and professional codes of conduct. Our Company implements Quality Management Standard 1’s provisions and maintains a comprehensive quality control system in line with this, including ethical provisions, professional standards and written policies and procedures in terms of compliance with the applicable regulation provisions. Our works have been conducted by an independent and multi-disciplinary team comprising of auditors and sustainability and risk experts. We have used the efforts of our expert team in order to help evaluate the reasonable nature of the information and hypothesis with regard to the Group’s risks and opportunities related to climate and sustainability. We are solely responsible for the conclusion of the assurance we provide.

9) SUMMARY OF WORKS CONDUCTED AS BASIS OF ASSURANCE CONCLUSION

We are required to plan and conduct our efforts to analyze the areas which we determine to have a high probability of containing significant errors in Sustainability Disclosure. The procedures we follow are based on our professional reasoning. As we conducted limited assurance engagement with regard to the Sustainability Disclosure:

- In-person and online interviews were conducted with the senior personnel of the Group at key positions in order to understand the processes used to obtain the information in the Sustainability Disclosure.
- The Group's internal documentation was used to assess and review the information related to sustainability.
- Disclosure and presentation of the information related to sustainability were assessed.
- Through investigations, opinions were formed about the Group's control frame and information system in relation to the preparation of Sustainability Disclosure. However, the design of certain control activities was not assessed, no evidence was obtained regarding their implementation and their operations' effectiveness was not tested.
- Assessment was made with regard to whether the Group's methods of estimation were suitable and whether they were consistently implemented. However, our procedures do not involve testing data on which estimations are based or developing our own estimations to assess the Group's estimations.
- Digitization methods for GHG and selection of the Reporting policies were assessed.

Procedures implemented in limited assurance engagement differ from reasonable assurance engagement in terms of nature and timing, having narrower scopes. In conclusion, the assurance level ensured as a result of limited assurance engagement is significantly lower compared to the assurance level to be obtained as a result of reasonable assurance engagement.

MGI Bağımsız Denetim A.Ş.
A Member of MGI WORLDWIDE



Özcan AKSU
Auditor in charge
(Istanbul, October 31, 2025)

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