

LIMAK CIMENTO SANAYI VE TICARET ANONIM SIRKETI

2024 CDP Corporate Questionnaire 2024

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.

[Terms of disclosure for corporate questionnaire 2024 - CDP](#)

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C1. Introduction

(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

Limak Cement Group has started its operations with Kurtalan Cement Plant with annual 1 million ton cement production capacity acquired by Limak Holding in 2000. Ergani and Gaziantep Cement Plants were acquired from Saving Deposit Insurance Fund (TMSF) via asset selling in 2006. One year later, Limak Cement Group acquired Şanlıurfa Cement Plant and increased its cement production capacity to 5,4 million ton annually. Bitlis Cement Plant in 2008 and Derik Cement Plant in 2009 investments were completed. Having increased the annual production capacity to 6,9 million ton with these investments, Limak Cement expanded its operations by acquiring 12 ready-mix concrete plants and 4 cements plants from Set-Italicement in 2011, which allowed to increase the capacity to 13,3 million ton in total. In 2013, Manisa-Egeçim Cement Plant was acquired. Capacity increase investments have started in 2015, which enabled annual clinker and cement production capacities to reach 8 million ton and 14,9 million ton respectively. Limak Cement Group had ambitious to have a market in Sub-Saharan Africa Region and a cement plant in Mozambique by the name of Limak Cimentos S.A. started its operations in 2016. In the same year, all plants in Türkiye and overseas plant in Mozambique was merged under the legal name of Limak Çimento San. ve Tic. A.Ş. In 2018, overseas investment of Limak Cement Group continued with a new cement plant in Ivory Coast by the name of Limak Afrika S.A. and Anka (Polatlı) Cement Plant started its operations in the same year, which increased the cement production capacity to 15,6 million ton annually. Considering local investments, Kilis Cement Plant was built in 2019 and Trakya Waste Feeding System investment was realized. Anka Waste Feeding System was installed in 2021. Limak Cement R&D Center was registered by the Ministry of Industry and Technology in 2022. In 2023 as a result of the spin-off transaction, Şanlıurfa Cement Plant has been transferred to Limak Doğu Anadolu Çimento San. ve Tic. A.Ş. and it was offered to the public after all necessary legal steps taken. Balıkesir Waste Feeding System was also installed in the same year. Today, Limak Cement Group with all these investments and innovations has 17,7 million ton cement production capacity and 9,6 million ton clinker production capacity annually with 7 integrated cement plants and 2 grinding stations in Türkiye and 2 grinding stations in Africa. In addition, the Group has 32 ready-mix concrete plants in Türkiye. The cement production process consumes significant amounts of fuel and emits CO2 when processing raw materials, leading the global cement industry to contribute around 7% of human-induced CO2 emissions worldwide. As a result, climate protection is a very important issue for us and is a deep part of our strategic planning. We attach a high strategic importance to our rigorous climate protection targets. We aim to reduce our Scope 1 and 2 CO2 emissions (kg CO2 per ton of cement produced) by around 34% by 2030 and also to achieve net zero emissions by 2050. Moreover, the goal is to achieve 28% water efficiency by 2026.

[Fixed row]

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

(1.4.1) End date of reporting year

12/30/2023

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

Select from:

Yes

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

Select from:

Yes

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

Select from:

Not providing past emissions data for Scope 1

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

Select from:

Not providing past emissions data for Scope 2

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

Select from:

Not providing past emissions data for Scope 3

[Fixed row]

(1.5) Provide details on your reporting boundary.

	<p>Is your reporting boundary for your CDP disclosure the same as that used in your financial statements?</p>
	<p>Select from:</p> <p><input checked="" type="checkbox"/> Not applicable – we do not publicly disclose financial statements</p>

[Fixed row]

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

ISIN code - bond

(1.6.1) Does your organization use this unique identifier?

Select from:

No

ISIN code - equity

(1.6.1) Does your organization use this unique identifier?

Select from:

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:

No

SEDOL code

(1.6.1) Does your organization use this unique identifier?

Select from:

No

LEI number

(1.6.1) Does your organization use this unique identifier?

Select from:

Yes

(1.6.2) Provide your unique identifier

789000EEUQIGHI88WH47

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]

(1.24) 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

As Limak Cement, our upstream activities include a hands-on approach to sourcing key materials and resources. For instance, we deal with a local quarry known for its high-quality limestone, collaborate with a regional clay provider, and seek out specific additives from specialized suppliers to enhance the cement's properties. The machinery that grinds and mixes these materials is just as important, so we maintain close relationships with equipment manufacturers for state-of-the-art cement mixers and ensures a steady supply of maintenance parts. In addition, we establish a robust distribution network, contracting a fleet of trucks from a reputable transport company known for its punctuality and safety record. We also work with a logistics firm that uses advanced tracking systems to streamline deliveries. Additionally, we take responsibility for the lifecycle of its products by working with waste management entities to recycle concrete and cement waste, turning them

back into usable materials. For our downstream activities, our direct relationships with customers allow for continuous improvement of products and services through feedback we received. The creation of feedback systems for external stakeholders, monitoring and reporting of these systems, and the aim to have feedback mechanisms in all companies up to date and fully implemented with complete participation by the year 2023 is achieved. Moreover, associations and industry groups serve as vital sources of information and networking opportunities, facilitating the sharing of innovations, best practices, and compliance with regulatory changes within the sector. Collaborations and exchanges through these organizations enable businesses to rapidly adapt to dynamic market conditions and develop sustainable growth strategies. Coping with our suppliers, we established the Limak Cement Academy platform to meet the internal training needs of them. In 2022, we enhanced the platform by incorporating a comprehensive set of training modules that aim to expand the sustainability horizon of their suppliers, offering information ranging from the fundamentals of sustainable development to individual awareness activities. Our goal is providing supplier training through the Limak Cement Academy training platform in also 2023.

[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:

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

(1.24.1.2) Value chain stages covered in mapping

Select all that apply

Upstream value chain

Downstream value chain

End-of-life management

(1.24.1.4) End-of-life management pathways mapped

Select all that apply

Recycling

Waste to Energy

Landfill

[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)

3

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

The short-term horizon is crucial for complying with imminent regulations, such as those aligned with the European Green Deal and Paris Agreement. The organization uses this period to adapt quickly to regulatory changes that could directly impact operational costs due to carbon pricing mechanisms and the associated economic burden. The short-term timeframe is aligned with the organization's operational planning to mitigate immediate risks like extreme weather events that could disrupt activities. This timeframe aligns with the organization's need to immediately address regulatory and market changes that could affect its bottom line. Short-term planning helps ensure the company remains compliant, manages risks effectively, and avoids penalties or operational disruptions. Integrating short-term environmental assessments with financial planning ensures that the company can respond dynamically to regulatory changes and manage cash flow impacts due to potential carbon pricing costs

Medium-term

(2.1.1) From (years)

3

(2.1.3) To (years)

5

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

In the medium term, the company focuses on transitioning to a low-carbon economy by investing in carbon pricing mechanisms and alternative fuels like biomass. This aligns with the company's strategy to reduce its carbon footprint, mitigate regulatory risks, and capitalize on potential incentives or carbon credits. Financially, this period involves allocating resources to research and development for alternative materials, which could reduce future costs and increase competitive advantage. The 3-10 year period is chosen to balance the need for immediate action with the time required to implement more substantial changes, such as adopting alternative fuels and developing new technologies. This period allows for both adaptation to new regulations and proactive investment in sustainable practices. By aligning medium-term plans with environmental opportunities, the organization can strategically manage investment in new technologies and alternative fuels. This supports capital budgeting processes and allows the company to anticipate and mitigate medium-term risks, enhancing financial resilience

Long-term

(2.1.1) From (years)

5

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

Select from:

No

(2.1.3) To (years)

10

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

The long-term horizon is focused on the complete transition to renewable and clean energy sources, aligning with global trends and organizational commitments to sustainability. The strategic aim is to decarbonize the production process, reduce dependence on fossil fuels, and improve operational efficiency. Financially, this aligns with the organization's capital planning to reduce costs associated with energy consumption and prepare for a future carbon-neutral market. A 10 year horizon is selected to align with the lifespan of critical assets and the longer-term impacts of climate change. This period is appropriate for making significant capital investments in infrastructure, such as renewable energy sources, that require more extended periods to implement and realize returns. The long-term horizon supports strategic goals by setting a pathway towards sustainability, meeting future regulatory standards, and capturing long-term value through energy savings and brand enhancement. It aligns with the organization's long-term capital investment strategies to ensure sustained growth and risk management
[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: <input checked="" type="checkbox"/> Yes	Select from: <input checked="" type="checkbox"/> 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: <input checked="" type="checkbox"/> Yes	Select from: <input checked="" type="checkbox"/> Both risks and opportunities	Select from: <input checked="" type="checkbox"/> 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
- Plastics
- Biodiversity

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

Select all that apply

- Dependencies
- Impacts
- Risks
- Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

- Direct operations
- Upstream value chain
- 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

(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

- National

(2.2.2.12) Tools and methods used

Commercially/publicly available tools

- WRI Aqueduct
- WWF Biodiversity Risk Filter

Enterprise Risk Management

- Enterprise Risk Management

International methodologies and standards

- Environmental Impact Assessment
- ISO 14001 Environmental Management Standard
- ISO 14046 Environmental Management – Water Footprint

(2.2.2.13) Risk types and criteria considered

Acute physical

- Drought
- Tornado
- Wildfires
- Heat waves
- Cold wave/frost
- Cyclones, hurricanes, typhoons
- Heavy precipitation (rain, hail, snow/ice)
- Flood (coastal, fluvial, pluvial, ground water)
- Storm (including blizzards, dust, and sandstorms)

Chronic physical

- Groundwater depletion
- Water availability at a basin/catchment level
- Water stress

Policy

- Carbon pricing mechanisms
- Changes to national legislation
- Poor enforcement of environmental regulation
- Regulation of discharge quality/volumes

Market

- Availability and/or increased cost of raw materials
- Changing customer behavior

Reputation

- Increased partner and stakeholder concern and partner and stakeholder negative feedback

Technology

- Transition to lower emissions technology and products
- Unsuccessful investment in new technologies

Liability

- Exposure to litigation
- Non-compliance with regulations

(2.2.2.14) Partners and stakeholders considered

Select all that apply

- | | |
|---|--|
| <input checked="" type="checkbox"/> NGOs | <input checked="" type="checkbox"/> Regulators |
| <input checked="" type="checkbox"/> Customers | <input checked="" type="checkbox"/> Local communities |
| <input checked="" type="checkbox"/> Employees | <input checked="" type="checkbox"/> Indigenous peoples |
| <input checked="" type="checkbox"/> Investors | <input checked="" type="checkbox"/> Water utilities at a local level |
| <input checked="" type="checkbox"/> 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

Our process covers all stages of the value chain—direct operations, upstream, and downstream—ensuring a full assessment of climate-related risks and opportunities across suppliers, distribution, and customers. These risks and opportunities are integrated into our risk management framework, aligned with ISO 31000 principles. The process is dynamic, allowing continuous improvement and alignment with regulatory and market changes. We assess risks annually and as needed for strategic shifts or new regulations. Our Carbon Reduction Strategy Committee meets bi-weekly, ensuring ongoing monitoring and rapid response to data or regulatory changes. We evaluate risks across short (0-3 years), medium (3-5 years), and long (5-10 years) horizons, addressing immediate operational risks and long-term planning for a low-carbon transition. Our identification and assessment process begins with a comprehensive environmental risk analysis across all operational sites, covering direct and indirect impacts throughout the value chain. Scenario analysis models outcomes based on 1,5C and 2C warming scenarios to

anticipate regulatory, market, and physical changes. Environmental performance indicators like carbon emissions intensity, energy efficiency, water use, and waste are monitored regularly. This data informs corrective action plans to ensure compliance with industry standards and regulations. Scenario analysis also helps us assess dependencies (e.g., water availability or regulatory shifts) and their financial impact. Carbon pricing and water scarcity are factored into financial projections. Data sources include climate models, market reports, and policy forecasts. Our Carbon Reduction Strategy Committee, formed in 2023, includes experts from trade, finance, business development, and sustainability. The team tracks global regulations like the Paris Agreement to identify risks and evaluate financial and operational impacts. Insights are shared with senior management for strategic decision-making. Climate-related risks are incorporated into financial planning, including capital allocation for renewable energy projects, carbon capture initiatives, and sustainability investments, aligning with our long-term goals. We use a tiered risk assessment methodology, considering qualitative and quantitative factors such as regulatory shifts or physical risks like floods. Data sources include internal systems, third-party audits, and industry benchmarks. In regions with limited data, we collaborate with governments and NGOs to ensure accurate assessments. Our monitoring process is continuous, covering metrics like carbon reduction, water use, and waste. A real-time dashboard allows management to track progress. Substantive risks are reported to the Board and included in financial disclosures following TCFD recommendations. We evaluate climate risks based on financial impacts, including capital expenditure for new projects or cost savings from energy efficiency. This proactive approach helps mitigate risks that could materially affect operations or finances. In summary, our climate risk management approach mitigates risks and leverages opportunities from the low-carbon transition. Through scenario analysis, monitoring, and alignment with global standards, we embed climate risks in our business strategy and financial planning.

[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

We assess the interconnections between environmental dependencies, impacts, risks, and opportunities across our value chain, covering direct operations, upstream, and downstream activities. This process is integrated into our risk management framework, aligned with ISO 31000 principles, to address all environmental risks and opportunities, particularly those related to water. Our direct operations—raw material extraction, clinker production, grinding, packaging, and distribution—depend on water for cooling, dust suppression, and equipment maintenance. Water scarcity or contamination poses a risk to operational continuity and productivity, so we incorporate water availability into our risk assessments and operational planning. Scenario analyses, using 1.5C and 2C warming models, help us anticipate potential regulatory, market, and physical changes, such as reduced water availability. Upstream, we assess water usage by suppliers and in the procurement of raw materials, including additives, supplementary materials, and energy. Suppliers in water-stressed regions face production disruptions or increased costs, affecting our supply chain. We use a tiered risk assessment methodology, considering both qualitative and quantitative factors, such as droughts or regulatory changes. We engage with suppliers to promote water-efficient practices and reduce overall water-related risks. Downstream, we consider how water scarcity might impact product demand or influence customer preferences for products with a lower water footprint. Opportunities exist to highlight our products' water efficiency as a competitive advantage in regions prioritizing water conservation. Understanding these dynamics allows us to better position our products and align with sustainable market trends. The interconnections between environmental dependencies, impacts, risks, and opportunities are continuously monitored by our Carbon Reduction Strategy

Committee, which meets bi-weekly to review new data and regulatory changes. This team—comprising trade, finance, business development, and sustainability experts—ensures a holistic view of risks and opportunities. Monitoring environmental performance indicators, such as water use, carbon emissions, and energy efficiency, helps refine our strategies and decisions. While we face water-related risks, we see opportunities in regions with water surplus to optimize water management, reduce costs, and enhance sustainability. Our scenario analysis anticipates changes in water availability and regulatory requirements, which are integrated into financial planning and aligned with global standards like the TCFD recommendations. Embedding these interconnections into our risk management framework enables us to mitigate risks and capitalize on opportunities arising from environmental dependencies, ensuring resilience, regulatory alignment, and progress toward our sustainability goals in a changing global environment.

[Fixed row]

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

(2.3.1) Identification of priority locations

Select from:

- Yes, we have identified priority locations

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

Select all that apply

- Direct operations

(2.3.3) Types of priority locations identified

Sensitive locations

- Areas of limited water availability, flooding, and/or poor quality of water
- Areas of importance for ecosystem service provision

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

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

(2.3.4) Description of process to identify priority locations

This year, we expanded our focus from two initial sites (Kilis and Şanlıurfa) to six locations identified as water-stressed: Anka, Balıkesir, Ergani, Şanlıurfa, Kilis, and Trakya. The selection of these priority locations was guided by an analysis conducted in collaboration with the World Resources Institute (WRI) and internal assessments of water impact, dependencies, risks, and opportunities. Our plants in these six locations were identified as being at high risk for water stress due to their placement in regions with projected long-term water scarcity. The Kilis plant, located in the Asi Basin, and the Şanlıurfa plant, in the Tigris-Euphrates Basin, have been recognized for their critical water challenges, with further studies highlighting the impact of climate change on water availability. Similar assessments were conducted at the Anka, Balıkesir, Ergani, and Trakya plants, confirming their placement in water-stressed areas. Identification Process: The identification of priority locations involved a multi-step approach: Baseline Risk Assessment: Using tools like the WRI Aqueduct Water Risk Atlas, we mapped all facilities against indicators of water stress, scarcity, and projected climate impacts. This enabled us to identify facilities within high-risk basins such as the Asi and Tigris-Euphrates. Site-Specific Analysis: For each identified location, we carried out detailed studies of water usage patterns, dependency on water resources, and operational vulnerabilities. For example, the Kilis plant is transitioning to green recovery processes to adapt to the increasing drought risk in the Asi Basin, while the Şanlıurfa plant is focusing on sustainable water management solutions in the Tigris-Euphrates Basin. Facility-Wide Water Management Strategy: The "Smart Water Management Project" was implemented to establish a comprehensive water management system across all facilities, with a focus on those in water-stressed areas. The project enables real-time tracking and analysis of water produced and consumed, facilitates digital monitoring through the installation of pulse output meters, and aims to optimize water use, reduce costs, and ensure sustainability

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

Select from:

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

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

WRI Aquaduct_Limak Cement Water Stress Plants.docx
[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

Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:

EBITDA

(2.4.3) Change to indicator

Select from:

% decrease

(2.4.4) % change to indicator

Select from:

21-30

(2.4.6) Metrics considered in definition

Select all that apply

Frequency of effect occurring

Time horizon over which the effect occurs

Likelihood of effect occurring

(2.4.7) Application of definition

We identify and quantify the impact of primary risks based on internal risk assessment committee. The committee classifies risks into five impact levels: very low, low, medium, high, and very high. For our organization, "high" and "very high" impacts are considered substantive. High impact: This is defined as a risk affecting between 21% and 30% of our global EBITDA. Very high impact: This is defined as affecting over 31% of global EBITDA. These thresholds also apply to our business units, where financial risks are assessed relative to their contribution to the company's overall EBITDA. In addition to financial impacts, these risk levels are defined for strategic dimensions like health & safety, operational, reputational, and legal & compliance risks. Regarding frequency, the risks are assessed periodically (e.g., quarterly or annually) based on predefined criteria. The likelihood of occurrence and time horizon (short-, medium-, or long-term) are also key factors in this evaluation. The metrics and thresholds are reviewed and updated regularly, ensuring alignment with evolving business conditions and external risks.

Opportunities

(2.4.1) Type of definition

Select all that apply

- Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:

- EBITDA

(2.4.3) Change to indicator

Select from:

- % increase

(2.4.4) % change to indicator

Select from:

- 31-40

(2.4.6) Metrics considered in definition

Select all that apply

- Frequency of effect occurring
- Time horizon over which the effect occurs
- Likelihood of effect occurring

(2.4.7) Application of definition

We identify and quantify the potential opportunities based on internal risk assessment committee. These committee classifies opportunities into five impact levels: very low, low, medium, high, and very high. For our organization, "high" and "very high" opportunities are considered substantive. High opportunity: This is defined as an initiative or strategy that enhances global EBITDA by between 31% and 40%. Very high opportunity: This is defined as a strategic opportunity that increases global EBITDA by over 41%. These thresholds are also applied across our business units, where the potential financial benefits are assessed in relation to each unit's contribution to the company's overall EBITDA. Beyond financial impacts, these levels of opportunity are also defined for strategic areas such as health & safety improvements, operational efficiencies, reputational gains, and advancements in legal & compliance standards. Opportunities are evaluated periodically, with frequency (e.g., quarterly or annually) and time horizon (short-, medium-, or long-term) being key metrics. Likelihood and potential magnitude of the benefit are also critical factors. The metrics and thresholds for identifying and seizing these opportunities are reviewed and updated regularly, ensuring the company remains agile in responding to favorable market conditions and innovations.

[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

Receiving environment standards defined by relevant regulations also act as restrictive for maintaining the quality of water bodies. On the other hand, in the Water Pollution Control Regulation (OG dated 31.12.2004 and numbered 25687) prepared and in force for the protection of water bodies in our country, the limit value for any pesticide type is not included in the receiving environment discharge standards. Although there is no limit value in Turkish legislation, chlorination is carried out in our factories in order to purify the drinking water and to prevent the formation of living things such as bacteria and viruses. With the chlorine pump control chart, reverse osmosis inlet and outlet waters are monitored. In our plants, the waste water generated after use and from the process is given to the sewerage in case of a municipal sewer line. Our factories connected to the sewerage have obtained a discharge quality control license from the relevant municipality. A sample is taken every 6 months by the municipality officials, and the analysis values are appropriate. Within the scope of the Turkish Environmental permit and license regulation, the wastewater is treated in the treatment system in our factories and works in accordance with the limit values specified in the water pollution control regulation. In order to determine the effluent quality, KOI, BOI, PH and AKM analyzes are performed by accredited laboratories at the frequencies specified in the relevant regulation.
[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

At our production facilities, wastewater generated from processes is directed to the municipal sewerage system where available. Factories connected to the sewerage system have secured discharge quality control permits from the respective municipalities. The quality of the discharge is verified every six months through samples collected and analyzed by municipal officials, with all results conforming to the required standards. Our wastewater treatment systems comply fully with the Water Pollution Control Regulation, as stipulated by the Turkish Environmental Permit and License Regulation. Accredited laboratories conduct regular chemical oxygen demand (COD), biochemical oxygen demand (BOD), pH, and suspended solids (SS) analyses to assess effluent quality, adhering to the frequencies mandated by the regulations.

(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

- Water recycling
- Resource recovery
- Beyond compliance with regulatory requirements
- Reduction or phase out of hazardous substances
- Requirement for suppliers to comply with regulatory requirements
- Industrial and chemical accidents prevention, preparedness, and response
- Assessment of critical infrastructure and storage condition (leakages, spillages, pipe erosion etc.) and their resilience

(2.5.1.5) Please explain

Although no specific pesticide discharge limits exist under Turkish law, chlorination is routinely implemented across our facilities to safeguard drinking water from microbial contamination. This process is meticulously monitored, with chlorine levels and reverse osmosis system inputs and outputs tracked via control charts. These measures ensure consistent water quality and align with our commitment to maintaining the highest environmental standards within the scope of national regulations.

[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:

Environmental risks exist, but none with the potential to have a substantive effect on our organization

(3.1.3) Please explain

Our organization recognizes that environmental risks exist in relation to plastics, but none of these risks have the potential to cause substantive effects on our operations or value chain. We have taken measures to manage any minor risks through sustainable practices and continuous monitoring, ensuring that they remain manageable without impacting the core functioning of our business

[Fixed row]

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

Climate change

(3.1.1.1) Risk identifier

Select from:

Risk1

(3.1.1.3) Risk types and primary environmental risk driver

Policy

Carbon pricing mechanisms

(3.1.1.4) Value chain stage where the risk occurs

Select from:

Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

Turkey

(3.1.1.9) Organization-specific description of risk

There will be carbon emission limits under the INDCs of the Paris Climate Agreement and also the Green Deal Agreement will set carbon emission limits. There are currently two alternative carbon pricing mechanisms, ETS or Carbon Tax. According to the World Bank's State and Trends in Carbon Pricing, most carbon prices are low, with almost half of covered emissions priced below US10/tCO₂e, but the High Level Commission on Carbon Prices estimates that carbon prices of US50-100/tCO₂e are needed by 2030 to cost-effectively reduce emissions in line with the temperature targets of the Paris Agreement. With the 2026 EU CBAM and the subsequent Turkish ETS, carbon pricing could be a risk. Costs could also be significantly affected by carbon prices to be paid for carbon emissions if sectors fail to meet targets. There may also be a risk that the cost increase will be reflected on product prices and this may create a competitive disadvantage. Limak has established the Carbon Reduction Strategy Committee in order to manage these risks. In the light of this committee, our emission reduction targets for 2030 and 2050 carbon road map targets have been established. The decisions taken in this committee, which convenes every two weeks under the leadership of the CEO, will be implemented quickly. Through the CEO, important carbon reduction project investment decisions will be reported directly to the Board of Directors.

(3.1.1.11) Primary financial effect of the risk

Select from:

- Increased indirect [operating] costs

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

Select all that apply

- Short-term

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

Select from:

- Very likely

(3.1.1.14) Magnitude

Select from:

- High

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

The anticipated effects of Emissions Trading System (ETS) risks on an organization's financial position, performance, and cash flows include increased compliance and operational costs, the need for capital investments in emission-reducing technologies, and potential impacts on competitiveness due to the cost of carbon allowances. Market volatility can affect the cost of allowances, creating financial risk, while regulatory changes can introduce compliance risks and associated fines.

Reputational damage from poor ETS management can affect customer and investor relations, and operational changes to reduce emissions can disrupt business processes. Financial reporting must account for ETS liabilities and assets, impacting earnings and balance sheets. Liquidity may be affected by the cash required to purchase allowances, and strategic risks may necessitate business model adjustments. Opportunity costs from diverted resources and the risk of carbon leakage can also impact financial outcomes. Effective risk management and sustainable practices are essential to mitigate these potential negative effects.

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

Select from:

Yes

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

895338662

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

1668965503

(3.1.1.25) Explanation of financial effect figure

The total clinker production amount is 8056097 t /year according to information gathered from Process Department. The CO2 density value of the Group was calculated 845 kg CO2/ t clinker. ETS cap for EU countries are accepted as 749 kg CO2 /t clinker as reference value. The difference between company data and cap value is around 96 kg CO2/t clinker. According to Trading Economics data the average EU ETS unit price was accepted as reference which was realized as 83 EUR/ton CO2e in reporting year. The average Euro/TL exchange rate was taken as 26,02 TL from the Central Bank of Turkey. The maximum financial impact was calculated as 1,668,965,503 TL. The minimum financial impact was calculated as 895,338,662 TL. The Euro/TL exchange rate was taken constant as 26,02 TL.

(3.1.1.26) Primary response to risk

Engagement

Engage with regulators/policy makers

(3.1.1.27) Cost of response to risk

902805611

(3.1.1.28) Explanation of cost calculation

In 2023, Limak Çimento adopted several key measures to manage this risk effectively. A primary focus has been engaging with regulators and policymakers to stay ahead of regulatory changes related to environmental sustainability and to shape future industry standards. This has allowed the company to align its operations with upcoming regulations and ensure long-term compliance. Additionally, Limak Çimento actively collaborates with NGOs and special interest groups, contributing to various initiatives aimed at reducing environmental impact and promoting best practices in the sector. These partnerships are essential in enhancing the company's sustainability efforts and addressing key environmental challenges. To support these efforts, Limak Çimento has increased its capital expenditure on environment-related projects. This includes investments in emission reduction technologies, energy efficiency improvements, and projects aimed at increasing the use of alternative fuels.

(3.1.1.29) Description of response

Cost of response data is received by our recent CAPEX Investment Plan. These investments are considered in the CAPEX plans and it is calculated to be 902805611 TL. In line with the EU's CBAM, Turkey's Phase 2 Mechanism is designed to align its carbon regulations with international standards and reduce the risk of trade imbalances caused by differing carbon policies. The Ministry of Environment, Urbanization, and Climate Change in Turkey has been actively working on preparing the country for this transition.

Water

(3.1.1.1) Risk identifier

Select from:

Risk4

(3.1.1.3) Risk types and primary environmental risk driver

Acute physical

Other acute physical risk, please specify :Natural disasters (Floods, heavy precipitation, drought, water stress)

(3.1.1.4) Value chain stage where the risk occurs

Select from:

Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

- Turkey

(3.1.1.7) River basin where the risk occurs

Select all that apply

- Asi (Orontes)
- Maritsa
- Sakarya
- Tigris & Euphrates

(3.1.1.9) Organization-specific description of risk

Using the WRI Aqueduct tool, we analyzed the basins where our facilities are located. As a result of these analyses, we identified that in addition to water stress and drought risks could also be impactful, and we conducted scenario studies. Following these scenario studies, we carried out research to determine in what timeframe natural disasters such as droughts could affect us and what their financial impact would be.

(3.1.1.11) Primary financial effect of the risk

Select from:

- Increased indirect [operating] costs

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

Select all that apply

- Short-term

(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-low

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

Flood and drought risks can significantly impact an organization's financial health. Floods can cause asset damage, operational downtime, and increased insurance premiums, leading to decreased financial performance and operating cash flows, as well as increased investing cash flows for rebuilding. Droughts can result in resource scarcity, higher operational costs, and potential revenue loss, affecting financial performance and necessitating investments in water-saving technologies. Both risks require a reassessment of risk management strategies and may prompt investments in mitigation measures and operational diversification to reduce future vulnerabilities.

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

Select from:

Yes

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

23803505.65

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

42049113.57

(3.1.1.25) Explanation of financial effect figure

According to the cost of downtime analysis. The average cost of a 3-day shutdown in order to eliminate the disaster in question for the flood scenario that may occur in our Trakya and Kilis factories and to reactivate the factory; 23,803,505.65 TL. For the drought scenario that may occur in our plants; It takes an average of 2 weeks for the process of drilling a new water well or connecting to the mains water, and since the operation will be interrupted, average. cost; It was calculated as 42,049,113.57 TL. These estimates reflect the direct financial burden of disaster recovery efforts, excluding indirect costs such as loss of market share or customer base during operational downtime.

(3.1.1.26) Primary response to risk

Infrastructure, technology and spending

Adopt water efficiency, water reuse, recycling and conservation practices

(3.1.1.27) Cost of response to risk

21177437.64

(3.1.1.28) Explanation of cost calculation

Insurance policies have been created to cover the financial losses of all personnel and visitors affected by business activities, subcontractors, supplier personnel from whom services are purchased, all related parties, that may be caused by natural disasters or potential natural disasters during their activities. A total of 31626122.54 TRY was paid to these policies in 2023. 21177437.64 TRY is the total policy value allocated to climate-related risks.

(3.1.1.29) Description of response

The management of these risks, including drought, water stress and floods, is carried out in accordance with standard requirements covering activities and processes in all Limak Cement locations. These measures are part of our broader risk management framework that anticipates the potential impacts of changing climate conditions on our operations. Drought and water stress are particularly critical issues for our operations, as water scarcity can disrupt production processes, cooling systems and material handling. To address this, we implement proactive water conservation strategies and maintain emergency water reserves to ensure operational continuity. We also continuously assess the availability of water resources and integrate these findings into our operational planning and risk mitigation measures. For flood risk management, we conduct site-specific assessments to identify vulnerabilities and implement infrastructure improvements such as improved drainage systems and elevated storage facilities to protect assets. Our insurance policies provide financial coverage for any damage caused by floods, ensuring business operations continue with minimal disruption. Through these comprehensive risk management strategies, we are better prepared to respond to the impacts of drought, water stress and floods, minimizing potential disruptions and protecting the interests of all parties involved. The cost of response calculations are estimated based on regular insurance payments. Insurance policies have been established to cover all personnel and visitors affected by business activities, subcontractors, subcontractors, suppliers' personnel, and all related parties for material losses.

Climate change

(3.1.1.1) Risk identifier

Select from:

Risk3

(3.1.1.3) Risk types and primary environmental risk driver

Chronic physical

Other chronic physical risk, please specify :Earthquakes, Wildfires

(3.1.1.4) Value chain stage where the risk occurs

Select from:

- Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

- Turkey

(3.1.1.9) Organization-specific description of risk

The cement factories could be affected from the natural events such as cyclones, heavy rains, floods, draughts, earthquakes etc. The interruption of the raw material and fuel supply could happen due to such extreme natural events. This could cause operation stoppage which results with direct financial loss for the factory. For instance, there was heavy rain in Şanlıurfa Factory last years and the floods coming from the quarries was caused stoppage in Şanlıurfa Cement Plant since the most of the factory infrastructure was submerged and the raw material supply was interrupted. Additionally, on February 6, the 7.7 magnitude earthquake in Kahramanmaraş's Pazarcık district affected our factories in Kurtalan, Ergani, Kilis, and Urfa. In our country, which is located in the Mediterranean climate zone due to its geographical location, a large part of our forests are under fire threat, and 60% of the total forest area consists of first and second-degree fire-sensitive areas. Therefore, forest fires are among the priority issues in our country. Our factories have regions defined as green areas, which are prone to fire risks either naturally or due to carelessness. In the event of a fire, production activities will cease, leading to financial losses.

(3.1.1.11) Primary financial effect of the risk

Select from:

- Increased indirect [operating] costs

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

Select all that apply

- Short-term

(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-low

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

We continuously monitor these risks using scenario analyses and climate projections integrated into our risk management framework. This enables us to assess potential impacts on operations, embed climate considerations into our planning, and align strategies with our sustainability goals. These actions enhance our resilience and support long-term business continuity while minimizing disruptions from extreme weather events. By incorporating climate risks into our strategic planning and investment strategies, we proactively address the challenges posed by wildfires and earthquakes. This comprehensive approach ensures our operations are prepared to withstand environmental changes, meet regulatory requirements, and remain sustainable in the face of a changing climate. Wildfire risk can significantly impact an organization's financial health by causing asset impairments and increased liabilities, disrupting revenue streams, and leading to higher operating expenses. The immediate aftermath may see a decline in operating cash flows due to lost sales and increased recovery costs, while investing cash flows might rise due to the need for capital expenditures on rebuilding. Financing cash flows could also be affected as organizations may seek additional funds to cover recovery efforts. Overall, wildfires can destabilize financial performance and position, prompting a reassessment of risk management and preventive strategies to mitigate future risks.

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

Select from:

Yes

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

39472040.13

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

111809640.05

(3.1.1.25) Explanation of financial effect figure

For the fire scenario that may occur in our seven integrated factories; the cost of an average of 5 days of downtime when foreseeing the factory downtime due to the fire extinguishing operation and the units and equipment affected by the fire; between 39,472,040.13 TL and 111,809,640.05 TL

(3.1.1.26) Primary response to risk

Infrastructure, technology and spending

- Improve maintenance of infrastructure

(3.1.1.27) Cost of response to risk

10588718.82

(3.1.1.28) Explanation of cost calculation

To mitigate the risks associated with natural disasters such as wildfires and earthquakes, Limak Çimento has implemented several key actions. One of the primary steps taken is securing comprehensive insurance coverage for all operational facilities, covering assets such as cash, inventory, and tangible property. The total insured value for 2023 is 31,766,156.45 TRY, which helps protect against potential losses from extreme natural events. 10588718.82 TRY is the total policy value allocated to climate-related risks. Limak Çimento has developed emergency response and adaptation plans for facilities located in high-risk areas. These plans focus on minimizing operational disruption and ensuring that facilities can recover quickly after an event. The estimated total cost of implementing these risk mitigation measures, including insurance premiums and rehabilitation is considered.

(3.1.1.29) Description of response

The management of these risks is carried out in line with the standard requirements that cover the activities and processes of Limak Cement locations. Insurance policies have been created to cover the financial losses of all personnel and visitors affected by business activities, subcontractors, supplier personnel from whom services are purchased, all related parties, that may be caused by natural disasters or potential natural disasters during their activities.

[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:

CAPEX

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

67117751

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

Select from:

1-10%

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

71246494.51

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

Select from:

1-10%

(3.1.2.6) Amount of CAPEX in the reporting year deployed towards risks related to this environmental issue

902895611

(3.1.2.7) Explanation of financial figures

There will be carbon emission limitation within the scope INDCs (Intended Nationally Determined Contributions) of the Paris Climate Agreement and also, the Green Deal Agreement will determine carbon emission limitations. The exceedance of those limitations will be regulated with a carbon pricing mechanism. Currently, there are two alternative carbon pricing mechanisms which are ETS or Carbon Tax. European Countries are mostly using ETS system. According the State and Trends of Carbon Pricing document of the World Bank, despite ongoing developments, most carbon prices are low, with almost half of the covered emissions priced at less than US 10/tCO_{2e} but the High-Level Commission on Carbon Prices estimated that carbon prices of at least US40–80/tCO₂ by 2020 and US50–100/tCO₂ by 2030 are required to cost-effectively reduce emissions in line with the temperature goals of the Paris Agreement. In Turkey's 2023 INDC updated statement, Turkey changed the GHG reduction target for 2030, which was presented as 21% in 2015, to 41% under the Paris Climate Agreement. The physical risks are calculated by taking an

average of cost of downtime for the whole operations and the transition risks are identified according to the possible financial effects of the climate change related transition risks including EU CBAM, national ETS etc. The potential cost impact of the Carbon Border Adjustment Mechanism (CBAM) on Limak Çimento has been calculated based on the estimated carbon pricing for clinker imports to the European Union. According to the study conducted in collaboration with Turk Cimento, the responsible company is expected to incur a cost of 9.5 per tonne of clinker imported to Europe. With the exchange rate provided by the Central Bank of Turkey (approximately 1 26.02 TRY), this equates to a cost of approximately 247.19 TRY per tonne. Cost of carbon pricing per year: 271,343 tonnes/year 9.5 /tonne 26.02 TRY/ approximately 67,117,751 TRY per year. The physical risks correspond to 71246494.51 TRY for both climate and water related environmental risks. It is calculated by cost of downtime analysis.

Water

(3.1.2.1) Financial metric

Select from:

CAPEX

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

4118796

(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)

71246494.51

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

Select from:

1-10%

(3.1.2.6) Amount of CAPEX in the reporting year deployed towards risks related to this environmental issue

902895611

(3.1.2.7) Explanation of financial figures

The financial figure of 902,895,611 TRY allocated for CAPEX investments by us is a significant indicator of its commitment to growth and development. However, in the context of environmental issues, particularly those related to water, it's crucial to assess how this substantial investment is exposed to transition risks. These risks are particularly relevant for water, as we encompass regulatory, technological, market, and reputational changes that could impact the valuation and profitability of investments. For us, especially one with considerable investments like the 902,895,611 TRY in CAPEX, the vulnerability to transition risks associated with water can manifest in several ways. Regulatory changes demanding more efficient water use or imposing stricter standards on wastewater treatment can introduce additional costs. Technological shifts towards water-saving innovations may necessitate further investments to upgrade existing infrastructure or processes. Market dynamics could also shift, with consumers and partners increasingly favoring companies that demonstrate water stewardship and sustainable practices. Water is considered aligned with climate change in 2023, so the same amounts are proceeded here. The physical risks are calculated by taking an average of cost of downtime for the whole operations. The physical risks correspond to 71246494.51 TRY for both climate and water related environmental risks. It is calculated by cost of downtime analysis.

[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

Iran (Islamic Republic of)

Tigris & Euphrates

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

Select all that apply

Direct operations

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

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

Select from:

 26-50%**(3.2.10) % organization's total global revenue that could be affected**

Select from:

 Less than 1%**(3.2.11) Please explain**

Our Şanlıurfa, Ergani and Kurtalan plants is located in the Tigris-Euphrates basin, which has been identified as an area at risk of long-term water scarcity, as highlighted in the WWF Water Scarcity Report. This is a significant risk for our operations, as it could lead to increased costs due to the search for new water resources. The Tigris-Euphrates Basin Drought Management Plan states that the basin is highly susceptible to the effects of climate change, which reinforces the likelihood of water-related risks. Currently, this risk applies to three of our facilities, representing approximately 43% of our total operational facilities. The potential financial impact of this risk is estimated to be approximately 110 Million TRY. This cost is estimated according to possible cost of downtime calculation for 15 days, possible downtime for climate related risks.

Row 2**(3.2.1) Country/Area & River basin****Turkey** Asi (Orontes)**(3.2.2) Value chain stages where facilities at risk have been identified in this river basin**

Select all that apply

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

(3.2.4) % of your organization's total facilities within direct operations exposed to water-related risk in this river basin*Select from:* 1-25%**(3.2.10) % organization's total global revenue that could be affected***Select from:* Less than 1%**(3.2.11) Please explain**

Our Kilis factory located in the Asi (Orontes) river basin is exposed to significant water-related risks. This region faces increasing water scarcity due to climate change, which presents a long-term operational challenge. Water scarcity in this basin is expected to exacerbate costs, requiring us to invest in sustainable water resource management to mitigate these risks. The Asi basin, with its vulnerability to drought and fluctuating water availability, is critical to one of our facilities, representing approximately of our operational footprint. We are actively monitoring this risk and are in the process of developing adaptive measures to safeguard operations. Currently, this risk applies to three of our facilities, representing approximately 15% of our total operational facilities. The potential financial impact of this risk is estimated to be approximately 60 Million TRY. This cost is estimated according to possible cost of downtime calculation for 15 days, possible downtime for climate related risks.

Row 3**(3.2.1) Country/Area & River basin****Turkey** Sakarya**(3.2.2) Value chain stages where facilities at risk have been identified in this river basin***Select all that apply* Direct operations**(3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin**

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

Select from:

1-25%

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

Select from:

Less than 1%

(3.2.11) Please explain

Our Anka factory located in the Sakarya Basin is exposed to significant water-related risks. This region faces increasing water scarcity due to climate change, which presents a long-term operational challenge. Water scarcity in this basin is expected to exacerbate costs, requiring us to invest in sustainable water resource management to mitigate these risks. The Sakarya basin, with its vulnerability to drought and fluctuating water availability, is critical to one of our facilities. We are actively monitoring this risk and are in the process of developing adaptive measures to safeguard operations. Currently, this risk applies to three of our facilities, representing approximately 15% of our total operational facilities. The potential financial impact of this risk is estimated to be approximately 65 Million TRY. This cost is estimated according to possible cost of downtime calculation for 15 days, possible downtime for climate related risks.

Row 4**(3.2.1) Country/Area & River basin**

Turkey

Other, please specify :Susurluk Basin

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

Select all that apply

Direct operations

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

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

Select from:

1-25%

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

Select from:

Less than 1%

(3.2.11) Please explain

Our Balıkesir factory is located in Susurluk basin. Susurluk basin is not exposed to significant water-related risks. This region is not facing water scarcity due to climate change in the short-term. However, Türkiye is classified as high water stress area so for the potential climate related risks We are actively monitoring this risk and are in the process of developing adaptive measures to safeguard operations. The potential financial impact of this risk is estimated to be approximately 30 Million TRY. This cost is estimated according to possible cost of downtime calculation for 15 days, possible downtime for climate related risks.

Row 5**(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

Direct operations

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

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

Select from:

- 1-25%

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

Select from:

- Less than 1%

(3.2.11) Please explain

Our Trakya Factory is located in Maritsa Basin. This region faces increasing water scarcity due to climate change, which presents a long-term operational challenge. Water scarcity in this basin is expected to exacerbate costs, requiring us to invest in sustainable water resource management to mitigate these risks. The region also faces floods in the heavy precipitation. We are actively monitoring this risk and are in the process of developing adaptive measures to safeguard operations. Currently, this risk applies to three of our facilities, representing approximately 15% of our total operational facilities. The potential financial impact of this risk is estimated to be approximately 60 Million TRY. This cost is estimated according to possible cost of downtime calculation for 15 days, possible downtime for climate related risks.
[Add row]

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

	Water-related regulatory violations	Comment
	Select from: <input checked="" type="checkbox"/> No	There is no water related regulatory violations occurred during the reporting period.

[Fixed row]

(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	<i>Select from:</i> <input checked="" type="checkbox"/> Yes, we have identified opportunities, and some/all are being realized
Water	<i>Select from:</i> <input checked="" type="checkbox"/> 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

Resource efficiency

Other resource efficiency opportunity, please specify :Use of Alternative Fuel Sources

(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

The use of alternative fuel sources such as RDF and biomass could provide an opportunity to decrease the CO2 emission and cost of fuel supply but it requires a continuous supplier to prevent any interruption in operation. The RDF and biomass manufacturing plants should be popularized in Turkey since the current number of the plants are not feasible for this type of integration. However, this system could be used as optional source for the fuel. As Limak Cement Group, we completed our AF Feeding system investment in 2022 in order to reduce our GHG emissions and contribute to the circular economy, and in order to reduce fuel-related CO2 emissions in line with our Net zero carbon target for our Anka factory. After the necessary measurement and permit processes within the scope of legal regulations, fuels derived from domestic waste with low carbon emission and high biomass content, tire wastes and fuels derived from industrial waste have started to be used as alternative fuels. In 2023, we also completed similar waste feeding system and waste crushing unit investments in our Balikesir and Trakya factories. This expansion further strengthens our efforts to reduce fuel-related CO2 emissions across multiple locations. Moreover, in compliance with current regulations on secondary fuels and alternative raw materials, we have established a dedicated unit to conduct waste market research, negotiate with suppliers, and contribute to natural resource and energy conservation.

(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

- The opportunity has already had a substantive effect on our organization in the reporting year

(3.6.1.12) Magnitude

Select from:

- Medium

(3.6.1.13) Effect of the opportunity on the financial position, financial performance and cash flows of the organization in the reporting period

The use of alternative fuel sources such as RDF and biomass has presented an opportunity to reduce CO2 emissions and fuel costs. The financial performance was positively affected by decreased reliance on fossil fuels, allowing for operational cost savings. Furthermore, a 198% increase in alternative fuel usage compared to the previous year resulted in reduced greenhouse gas emissions. These initiatives improved cash flows by lowering raw material expenses and enhancing resource efficiency.

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

Select from:

Yes

(3.6.1.16) Financial effect figure in the reporting year (currency)

45736307

(3.6.1.23) Explanation of financial effect figures

As a result of alternative fuels used in Balıkesir, Anka and Trakya factories, natural resource consumption (lignite, petroleum coke, etc.) has decreased. As a result, the financial benefit arising from the reduction in energy costs used in operational expenses has been calculated.

(3.6.1.24) Cost to realize opportunity

29191094

(3.6.1.25) Explanation of cost calculation

Investment cost of alternative fuel dispatch and feeding system (belt, electrical cables, bunker operations, etc.) in order to reduce CO2 emissions from fuel in line with our net-zero target at our Trakya, Balıkesir and Anka Plants

(3.6.1.26) Strategy to realize opportunity

The cost of fossil fuels used today is higher than alternative and renewable fuels in most cases. This high cost not only increases inefficiency in terms of energy consumption and resource utilisation, but also makes it difficult to achieve environmental sustainability goals. Alternative fuels not only provide cost advantages, but also offer significant opportunities to reduce carbon footprint and minimise environmental impacts. In this context, the majority of our current and future projects focus

on waste management, reducing carbon emissions and increasing energy efficiency. Such arrangements encourage inter-industry co-operation and industrial symbiosis, enabling different sectors to utilise their waste as a source of energy or raw materials. For the Group, such approaches offer an important strategic opportunity to both reduce operational costs and generate environmentally friendly solutions, thus enabling the achievement of both financial sustainability and environmental development goals.

Water

(3.6.1.1) Opportunity identifier

Select from:

Opp3

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Resource efficiency

Water recovery from sewage treatment

(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

Asi (Orontes)

Maritsa

Sakarya

Tigris & Euphrates

- Other, please specify :Dicle Basin, Fırat Basin

(3.6.1.8) Organization specific description

Our factories are equipped with specially designed biological package treatment plants to process domestic wastewater. After treatment, this wastewater is discharged into dry river beds. For factories with access to municipal sewer lines, domestic wastewater is discharged directly into these sewers. We have also constructed settling ponds to treat surface water collected on site. The treated water from these ponds is then reused for dust suppression and irrigation at our plants. Due to the nature of our production processes, which involve the use of water in high-temperature cooling processes, a significant portion of water evaporates. Current Turkish environmental regulations do not require the installation of meters for wastewater discharges, although meters are installed at plant entrances and associated units, and wastewater quantities are determined by calculation methodology.

(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

- The opportunity has already had a substantive effect on our organization in the reporting year

(3.6.1.12) Magnitude

Select from:

- Medium

(3.6.1.13) Effect of the opportunity on the financial position, financial performance and cash flows of the organization in the reporting period

During the reporting period, the implementation of water reuse systems in our factories has contributed to a significant reduction in operating costs. By capturing surface water in settling pools and reusing it for field irrigation and coal stock spraying, we have minimized the need for additional water usage. This has directly reduced the cost associated with purchasing or sourcing water, thereby lowering indirect operating expenses. The immediate financial effect has been an improvement in cash flow due to reduced water-related expenditures, contributing positively to the overall financial performance of the organization in the short term.

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

Select from:

Yes

(3.6.1.16) Financial effect figure in the reporting year (currency)

4361829

(3.6.1.23) Explanation of financial effect figures

Under favour of the water recycling opportunity we have created in our factories, we reduce water consumption, prevent water waste and reduce water-related costs.

(3.6.1.24) Cost to realize opportunity

4118796

(3.6.1.25) Explanation of cost calculation

The cost savings associated with the water reuse systems are primarily derived from reduced water consumption and the associated reduction in operational costs. The water collected from surface areas, after passing through settling pools, is reused for irrigation and spraying purposes, eliminating the need for additional water resources. This results in lower utility bills and reduced reliance on external water supplies. The total cost savings from this opportunity can be calculated by considering the volume of water that would otherwise be sourced externally, multiplied by the unit cost of water. Additionally, the investment in the settling pool systems and pumps is considered a one-time capital expenditure, which is expected to provide long-term financial benefits by continuously reducing operational costs. The estimated savings for the reporting period amount to 4118796 TRY, based on the reduced water consumption and lower operational costs related to water procurement.

(3.6.1.26) Strategy to realize opportunity

At Limak Cement, we have adopted an innovative strategy for water management, focusing on the efficient use and recycling of water in our operations. In our factories, we utilize gradual settling pools for the collection of surface water, particularly in the packaging unit and coal stock areas. Suspended solids in the surface water are removed in these pools, and the treated water is pumped and used for irrigating impermeable concrete floors. Additionally, water collected from the coal stock area is recycled and used for dust suppression operations. Our strategy to realize this opportunity focuses on enhancing the efficiency of our water management systems, maintaining and monitoring performance through regular inspections, and expanding the use of recycled water in more operational areas. In the future, we anticipate that the ongoing use of water reuse systems will continue to deliver financial benefits by further reducing operational costs related to water consumption. As water becomes an increasingly scarce resource, the ability to reuse water for operational purposes will provide a competitive advantage, mitigating the financial risks associated with potential water shortages and price increases. This opportunity is expected to maintain a positive impact on our cash flows and financial performance in the short term, while also positioning the company to meet stricter environmental regulations and sustainability goals. In addition, the long-term operational savings will contribute to more stable and predictable financial outcomes.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

Opp2

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Resource efficiency

Other resource efficiency opportunity, please specify :Use of Alternative Raw Materials

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

Upstream value chain

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

Turkey

(3.6.1.8) Organization specific description

The alternative additive materials usage for less clinker usage to decrease CO2 emission provides significant opportunity for the Group. The R&D department follows the international developments on less carbon emitting clinker manufacturing methodologies and decrease in clinker amount for cement manufacturing. The most of the carbon emissions occur in clinker production phase so any mitigation strategy for that operation provides significant benefit especially against further carbon pricing developments. Also, the current raw materials are decreasing day by day and it will cause a competitive environment in future so alternative raw material source will provide great opportunity in long term. Limak Cement uses the wastes produced by facilities in different sectors as alternative raw materials in its plants within the scope of industrial symbiosis projects carried out with industrial organizations. Thus, waste evaluation is performed and natural resource consumption is reduced.

(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

- The opportunity has already had a substantive effect on our organization in the reporting year

(3.6.1.12) Magnitude

Select from:

- Medium

(3.6.1.13) Effect of the opportunity on the financial position, financial performance and cash flows of the organization in the reporting period

Usage of alternative raw materials is very important for the low carbon cement production. With the help of the alternative mineral additive materials for less clinker usage CO2 emission could decrease to a desired amount which provide significant opportunity for the Group. The R&D department is constantly researching innovative technologies and international developments on less carbon emitting clinker manufacturing methodologies.

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

Select from:

- Yes

(3.6.1.16) Financial effect figure in the reporting year (currency)

56708142

(3.6.1.23) Explanation of financial effect figures

The use of alternative raw materials is very important for low carbon cement production. Alternative raw materials used in our factories reduce natural resource consumption and are used as alternative raw materials substituting natural resources. Here, while reducing natural resource consumption, the financial cost burden is also reduced. In addition, with the help of alternative mineral additives for the use of less clinker, CO2 emissions are reduced to the desired amount and the consumption of natural resources is also reduced, which ultimately leads to significant opportunities for the Group. The R&D department is continuously researching innovative technologies and international developments in clinker production methodologies that emit less carbon.

(3.6.1.24) Cost to realize opportunity

2071745

(3.6.1.25) Explanation of cost calculation

The cost savings associated with this opportunity are primarily driven by reduced natural resource consumption and lower waste disposal fees. By substituting traditional raw materials with recycled alternatives, we decrease the need for resource extraction and transportation, which lowers operational costs.

(3.6.1.26) Strategy to realize opportunity

Our strategy to fully realize the benefits of this opportunity focuses on expanding the use of alternative raw materials across all of our production facilities. In addition to the six plants that have already transitioned to alternative materials, we plan to implement similar systems in our remaining facilities. We will continue to engage in industrial symbiosis initiatives, sourcing waste products from other industries to ensure a steady supply of alternative materials. Additionally, we will invest in new technologies and partnerships to increase the efficiency of our alternative raw material usage, with the goal of further reducing our carbon footprint and operational costs in the long term.

[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)

102444449

(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

For the financial metric aligned with opportunities arising from climate change, the total cost profit amount arising from the use of Alternative Raw Material and Alternative Fuel is given. The overall cost profit equals to 102444449 TRY for the reporting year and it corresponds to less than 1% in general.

Water

(3.6.2.1) Financial metric

Select from:

CAPEX

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

6907966

(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

During the reporting year, a portion of our capital expenditures (CAPEX) was directed towards environmental opportunities, specifically aimed at reducing water consumption and promoting water reuse in our factories. This includes investments in systems such as settling pools for surface water collection and reuse, which have significantly reduced the need for additional water resources. The total amount of CAPEX allocated environmental opportunities was, which corresponds to less than 1% of our total CAPEX for the year. These investments not only support our sustainability goals but also provide financial benefits by reducing operational costs associated with water consumption, contributing to the long-term resilience and efficiency of our operations.

[Add row]

C4. Governance

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

(4.1.1) Board of directors or equivalent governing body

Select from:

Yes

(4.1.2) Frequency with which the board or equivalent meets

Select from:

More frequently than quarterly

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

Select all that apply

Executive directors or equivalent

Non-executive directors or equivalent

(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 Human Resources Policy of Limak is centered around a participatory and value-creating approach, emphasizing change, transformation, and adherence to the company's vision, mission, competencies, and ethical values. It strongly advocates for a fair, transparent, efficient, healthy, and development-oriented work environment that supports gender equality, guided by the Corporate Equality Policy. The policy strictly opposes any form of discrimination or harmful practices based on individual characteristics such as gender, age, marital status, religion, language, ethnicity, pregnancy status, etc., from recruitment to all aspects of employment. Limak ensures the use of an egalitarian and inclusive communication style, supports the prohibition of child labor and adherence to legal working hours, and prioritizes female candidates with equal qualifications in recruitment. The company encourages the empowerment of women in decision-making roles, supports work-

life balance, and promotes equal sharing of domestic responsibilities among genders. Employees are encouraged to engage in personal and professional development, with internship programs for students and a "Zero Tolerance Policy" against any form of violence or sexual misconduct. Incentives are provided to boost motivation and organizational commitment, aiming to balance private and professional lives effectively.

(4.1.6) Attach the policy (optional)

p2NvBBAuXBRQDwyyBhL6.pdf
 [Fixed row]

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

	Board-level oversight of this environmental issue
Climate change	Select from: <input checked="" type="checkbox"/> Yes
Water	Select from: <input checked="" type="checkbox"/> Yes
Biodiversity	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

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

Climate change

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

Select all that apply

- Chief Executive Officer (CEO)
- Chief Financial Officer (CFO)
- Chief Operating Officer (COO)
- Chief Technology Officer (CTO)
- Board-level committee

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

Select from:

- Yes

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

Select all that apply

- Individual role descriptions

(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 the setting of corporate targets
- Approving corporate policies and/or commitments
- Reviewing and guiding innovation/R&D priorities
- Overseeing and guiding major capital expenditures
- 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

The sustainability and climate change issues are reviewed and evaluated during the weekly meetings. The Sustainability and Climate Change department searches for opportunities and follows the new developments to be able to maintain current operations and new investments in a more sustainable and free of climate related risk ways. There is a significant interest in sustainable manufacturing and reduction of climate related risks subjects in recent years since the devastating results of previous activities conducted with lack of environmental consideration are started to affect our daily lives and nature dramatically. As Limak Cement Group, we have completed, ongoing and planned studies on energy efficient, sustainable and less carbon emission manufacturing methods. Under the leadership of our board, we have decided to carry our studies in international scale by following and implementing most recent developments and participating top organizations actively working on climate related risks and sustainability. All the steps taken regarding the climate are supported by the CEO, CTO and COO and discussed at the top management. In 2023, unlike the previous year, ISO 14064-1:2018 Carbon Footprint was calculated for all our plants one by one and verified by an accredited 3rd organization by 2022 data. Carbon footprint calculation will continue to be done regularly every year for all our factories. The feasibility studies of the Solar Power Plant project with a total installed power of 34.75 MW for our Kurtalan, Şanlıurfa, Derik and Ergani power plants have been completed. Opinions of Marjinal Agriculture, Relevant Municipality and Other Institutions regarding SPP Projects with an installed power of 41.40 MW for our Anka factory and preliminary permit processes were completed in 2022. Waste feeding system in our Anka factory and tire shredder investments in our Trakya factory were made and they were put into use in the last quarter of 2022. Our Limak Aafrika SA Factory became the first factory in the cement industry to receive the ISO 14001 Environmental Management System certificate in Ivory coast(2022). Limak Cimentos SA, which has been deemed worthy of the "Best Industrial Investment Made in Mozambique" Award, has become a factory that can produce its own energy with the Natural Gas Power Generation Facility commissioned in June 2022 and has increased the energy production capacity of the country in which it is located. Provided 4.8 MW installed power support. Operational security has been ensured with this critical investment, especially at a time when Sub-Saharan African Countries are facing serious energy crises. All climate-related activities in our African factories are followed and monitored step by step by the factory general managers.

Water

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

Select all that apply

- Director on board
- Chief Executive Officer (CEO)
- Chief Financial Officer (CFO)
- Chief Compliance Officer (CCO)
- Board-level committee

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

Select from:

- Yes

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

Select all that apply

- Individual role descriptions

(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
- Approving corporate policies and/or commitments
- Reviewing and guiding innovation/R&D priorities
- Monitoring the implementation of the business strategy
- Overseeing and guiding acquisitions, mergers, and divestitures
- Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

(4.1.2.7) Please explain

Issues related to water are discussed at monthly process criteria meetings. If there are deviations from the determined targets, the main reason is discussed at the meeting. Annually determined budgets are evaluated at the process criteria meeting and when necessary, CAPEX is created and presented to the senior management. In addition, at the monthly sustainability meetings, the company's water-related targets are revealed and how much progress has been made is discussed. In addition, in these meetings, the supporting projects developed for the efficient use of water resources are discussed and reported to the CEO. The main agenda items of the meeting are to provide incentives for employees and to raise awareness for the efficient use of water resources, as well as to review and manage the business plans that have been implemented so far and will be implemented in the future.

Biodiversity

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

Select all that apply

- Director on board
- Chief Executive Officer (CEO)

- Chief Financial Officer (CFO)
- Chief Operating Officer (COO)
- Board-level committee

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

Select from:

- Yes

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

Select all that apply

- Individual role descriptions

(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
- Reviewing and guiding innovation/R&D priorities
- Approving and/or overseeing employee incentives
- Monitoring the implementation of the business strategy
- Overseeing and guiding acquisitions, mergers, and divestitures
- Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

(4.1.2.7) Please explain

As Limak Cement Group, we continue to pursue our commitment to biodiversity conservation and sustainable management of natural resources. In our factory sites and quarry areas, we conduct risk and opportunity assessments to monitor and improve environmental impacts, and measures are implemented accordingly. By planting tree and plant species that are adapted to regional climatic conditions, we are expanding green areas and maintaining our leadership in this field. To protect

biodiversity in our factory and quarry areas, the most up-to-date preventive, mitigative, and corrective activities are identified and implemented by our sustainability and climate change unit across the group. In collaboration with our Holding, a biodiversity policy has been established, and long-term biodiversity conservation plans will be developed. We fully comply with international standards such as those set by the IFC, World Bank, and ILO. Aligned with our sustainability goals, we continue to implement projects aimed at increasing green spaces and preserving the natural environment within these areas
[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)

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)

[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: <input checked="" type="checkbox"/> Yes
Water	Select from: <input checked="" type="checkbox"/> Yes
Biodiversity	Select from: <input checked="" type="checkbox"/> 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 environmental dependencies, impacts, risks, and opportunities
- Assessing future trends in environmental dependencies, impacts, risks, and opportunities
- Managing environmental dependencies, impacts, risks, and opportunities

Engagement

- Managing public policy engagement related to environmental issues
- Managing supplier compliance with environmental requirements
- Managing value chain engagement related to environmental issues

Policies, commitments, and targets

- Monitoring compliance with corporate environmental policies and/or commitments
- Measuring progress towards environmental corporate targets
- Measuring progress towards environmental science-based targets
- Setting corporate environmental policies and/or commitments
- Setting corporate environmental targets

Strategy and financial planning

- Developing a climate transition plan
- Implementing a climate transition plan
- Conducting environmental scenario analysis
- Managing annual budgets related to environmental issues
- Implementing the business strategy related to environmental issues
- Developing a business strategy which considers 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:

- More frequently than quarterly

(4.3.1.6) Please explain

The CEO of Limak Cement should have knowledge and responsibilities on sustainability and climate related issues since these concepts should be integrated and taken into consideration in all phases of the management studies as requirement of global mitigation actions. The CEO should stand over the studies of the Committee and evaluate the existing and future trends regarding current topics such as climate funding, carbon pricing and energy efficiency investments. While planning the financial strategies and future investments of the Group, the acting with the a climate sensitive consideration will provide significant contribution on sustainable development and risk reduction strategies of the company. CEO approves the investment decision of projects aimed at reducing carbon emissions. Our CEO who reports to the board is also the chairman of the newly established Limak Cement group carbon reduction strategy committee on carbon reduction issues. In summary, the main objective of this committee is; To determine the policies that will reduce the greenhouse gas emission of the Limak Cement group, to develop strategies compatible with the climate targets accepted by the European Union Commission, and CBAM etc. is to take precautions against the risks that other mechanisms may bring in the coming years. The CEO is the C-level executive with the highest authority, who chairs the Committee and is responsible for determining carbon reduction strategies and ensuring their sustainability, risk and opportunities, and defining the sustainability vision. Determining a general risk management strategy on climate-related issues in the Committee, identification of risks that may occur and measures to be taken against these risks, etc. The CEO also ensures that this committee meets at regular intervals, receives information from the committee members on carbon reduction strategies, leads and communicates with senior management to obtain financial support for appropriate projects

Water

(4.3.1.1) Position of individual or committee with responsibility

Executive level

- Chief Operating Officer (COO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

- Assessing environmental dependencies, impacts, risks, and opportunities

Engagement

- Managing value chain engagement related to environmental issues

Policies, commitments, and targets

- Monitoring compliance with corporate environmental policies and/or commitments
- Measuring progress towards environmental corporate targets

Strategy and financial planning

- Developing a business strategy which considers environmental issues
- Implementing the business strategy related to environmental issues
- Managing annual budgets related to environmental issues

(4.3.1.4) Reporting line

Select from:

- Reports to the Chief Executive Officer (CEO)

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

Select from:

- More frequently than quarterly

(4.3.1.6) Please explain

As Limak Cement Group, the Healthy Planet Committee within the Sustainability Management Platform ensures that comprehensive feasibility studies are conducted to achieve sustainability goals, particularly in the realm of water management. In addition to tracking sustainability targets, the committee diligently formulates detailed water action plans, ensuring the responsible and sustainable use of water resources across all operations. These plans are crafted with a forward-looking approach, addressing both local and global water challenges. The committee works closely with external stakeholders and industry experts to guarantee that water management practices not only meet current environmental regulations but also set new standards for long-term water stewardship and conservation.

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 environmental dependencies, impacts, risks, and opportunities

Policies, commitments, and targets

- Measuring progress towards environmental corporate targets

Strategy and financial planning

- Implementing the business strategy related to environmental issues

(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:

- More frequently than quarterly

(4.3.1.6) Please explain

As Limak Cement Group, the CEO ensures that biodiversity-related sustainability goals are pursued through rigorous oversight and comprehensive feasibility studies. The CEO is responsible for assessing environmental dependencies, impacts, risks, and opportunities, while closely monitoring progress toward corporate environmental objectives. By aligning these efforts with the company's strategic goals, sustainability is fully integrated into all business processes. The CEO oversees the incorporation of environmental initiatives into value propositions, corporate reputation, and stakeholder communication strategies. Annually, the CEO reports directly to the board, ensuring full transparency and accountability for all environmental and sustainability endeavors across the group
[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

1

(4.5.3) Please explain

Fundamental initiatives to achieve sustainable and financial development goals such as reducing fossil fuel, energy and raw material consumption and increasing the use of alternative fuels are reviewed and projected by the corporate team and the CEO. These initiatives are fundamentally important in the context of climate-related issues as they will directly affect greenhouse gas emissions. Investments in climate-related risks and opportunities are projected by both the Management and the Sustainability Committee under the control of the CEO, and are supported by the CEO in order to carry out efficient work and achieve results. In this way, with the incentives and motivation of the CEO, it is aimed to finalize climate-related issues more quickly. The CEO ensures his employees participation in international seminars where new technologies regarding renewable energy, CCUS projects and technologies are presented in order to encourage his employees on climate-related issues

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

(4.5.3) Please explain

Monitoring sustainability activities and performances, determining the performance indicators required for monitoring these performances, and reviewing the performance and practices within the scope of water security priorities, and accordingly, incentives are provided to employees.

[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 – set figure

(4.5.1.3) Performance metrics

Targets

Progress towards environmental targets

(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

It is the CEO's responsibility to ensure the implementation of KPIs and operational performance indicators. Fundamental initiatives to achieve sustainable and financial development goals such as reducing fossil fuel, energy and raw material consumption and increasing the use of alternative fuels are reviewed and projected by the corporate team and the CEO. These initiatives are fundamentally important in the context of climate-related issues as they will directly affect greenhouse gas emissions. Investments in climate-related risks and opportunities are projected by both the Management and the Sustainability Committee under the control of the CEO, and are supported by the CEO in order to carry out efficient work and achieve results. In this way, with the incentives and motivation of the CEO, it is aimed to finalize climate-related issues more quickly. In this way, with the incentives and motivation of the CEO, climate-related issues are concluded more quickly and effectively. The CEO ensures his employees participation in international seminars where new technologies regarding renewable energy, CCUS projects and technologies are presented in order to encourage his employees on climate-related issues

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

Thanks to the CEO's encouragement to employees on climate-related issues, our climate-fighting plans are progressing positively. Employees who get the chance to conduct research in climate-related fields, work and develop different projects as a result of these incentives contribute to our future goals in many ways

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 – set figure

(4.5.1.3) Performance metrics

Targets

Progress towards environmental targets

(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

It is the CEO's responsibility to ensure the implementation of KPIs and operational performance indicators. Fundamental initiatives to achieve sustainable and financial development goals such as reducing fossil fuel, energy and raw material consumption and increasing the use of alternative fuels are reviewed and projected by the corporate team and the CEO. These initiatives are fundamentally important in the context of climate-related issues as they will directly affect greenhouse gas emissions. Investments in climate-related risks and opportunities are projected by both the Management and the Sustainability Committee under the control of the CEO, and are supported by the CEO in order to carry out efficient work and achieve results. In this way, with the incentives and motivation of the CEO, it is aimed to finalize climate-related issues more quickly. In this way, with the incentives and motivation of the CEO, climate-related issues are concluded more quickly and effectively. The CEO ensures his employees participation in international seminars where new technologies regarding renewable energy, CCUS projects and technologies are presented in order to encourage his employees on climate-related issues

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

Thanks to the CEO's encouragement of employees on water-related issues, our water sustainability initiatives are progressing positively. Employees who have the opportunity to research water management strategies and participate in different projects contribute to our long-term goals. These incentives lead to the development of new approaches to water efficiency, reuse, and conservation, which are essential to achieving our future objectives

Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

- Chief Financial Officer (CFO)

(4.5.1.2) Incentives

Select all that apply

- Bonus – set figure

(4.5.1.3) Performance metrics

Targets

- Progress towards environmental targets

(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

It is our CFO's responsibility to ensure that financial performance aligns with the company's sustainability KPIs and operational performance indicators. Key initiatives to meet both financial and sustainable development goals, such as optimizing resource allocation for energy efficiency, reducing fossil fuel consumption, and increasing investments in alternative fuels, are reviewed and overseen by the CFO. These efforts are crucial in the context of climate-related issues, as they directly influence financial planning and the reduction of greenhouse gas emissions. The CFO collaborates with the Management and Sustainability Committee to forecast investments in climate-related risks and opportunities, ensuring that the necessary financial support is in place for impactful outcomes. By ensuring that climate-related investments are financially sustainable, the CFO helps drive quicker, more effective results in reducing climate impacts

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

Thanks to the CFO's strategic focus on aligning financial resources with climate-related goals, our climate action plans are progressing positively. By integrating sustainability into financial decision-making, the CFO ensures that employees working on climate-related projects have the necessary funding and resources to explore new technologies, research solutions, and contribute to the company's long-term sustainability goals. This financial support drives innovation in climate initiatives and accelerates our progress toward a low-carbon future.

Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

- Chief Operating Officer (COO)

(4.5.1.2) Incentives

Select all that apply

- Bonus – set figure

(4.5.1.3) Performance metrics

Targets

- Progress towards environmental targets

(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 COO is responsible for ensuring that operational strategies align with the company's climate-related KPIs and performance metrics. Key operational initiatives, such as reducing the consumption of fossil fuels, improving energy efficiency, and increasing the use of alternative raw materials, are overseen and implemented by the COO. These initiatives are essential in mitigating climate-related risks, as they directly influence the company's greenhouse gas emissions and overall environmental footprint. The COO collaborates with the Sustainability Committee and the Management team, under the CEO's direction, to manage and forecast operational changes and investments that address climate-related opportunities. By optimizing the company's operations, the COO helps ensure that climate-related issues are resolved swiftly and effectively.

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

Thanks to the COO's leadership in operational excellence, our climate-related plans are progressing effectively. Employees who are encouraged to explore operational efficiencies, participate in renewable energy projects, and develop innovative processes are key contributors to our climate goals. The COO's focus on streamlining operations and reducing environmental impact empowers the workforce to find new ways of addressing climate challenges, significantly advancing our sustainability efforts.

Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

- Chief Technology Officer (CTO)

(4.5.1.2) Incentives

Select all that apply

- Bonus – set figure

(4.5.1.3) Performance metrics

Targets

- Progress towards environmental targets

(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 CTO is responsible for ensuring that technological advancements align with the company's KPIs and sustainability objectives. Major technological initiatives, such as reducing energy and raw material consumption and enhancing the use of alternative fuels, are reviewed and spearheaded by the CTO and the corporate team. These initiatives are critical for addressing climate-related issues as they involve the development of innovative solutions to reduce greenhouse gas emissions. The CTO, in collaboration with the Management and Sustainability Committee, oversees investments in climate-related technologies and opportunities. By fostering technological innovation under the CTO's leadership, the company accelerates its efforts to address climate challenges more efficiently and effectively

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

Thanks to the CTO's commitment to technological innovation in climate-related fields, our climate action plans are progressing positively. Employees who are encouraged to participate in research and development projects in areas like renewable energy, carbon capture, and storage (CCUS) technologies are playing a vital role in advancing our future sustainability goals. By staying at the forefront of technological developments, the CTO ensures that our company is well-positioned to lead in climate innovation, contributing to both operational efficiency and long-term environmental stewardship

Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

- Director on board

(4.5.1.2) Incentives

Select all that apply

- Bonus – set figure

(4.5.1.3) Performance metrics

Targets

- Progress towards environmental targets

(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

Sustainability Director on Board encourages trainings for the employees in our factories and facilities on environmental issues such as the foundations of sustainable development, sustainability, development goals, social development, sustainable development goals, and encourages the employees in this direction and raises awareness on issues related to climate change. All employees can fill out an environmental suggestion form through our online notification system LIMBES application. The Sustainability Director on Board and Sustainability Manager reviews the environmental suggestion forms and gives an encouraging certificate of appreciation to the employees. Corporate Sustainability and Climate Change Manager is main responsible for the implementation of the sustainability policies and improvement of the climate-related issues of the company. The planning and follow-up of the factory-based studies and the coordination of the sustainability and climate change responsible of each factory are in the responsibility of Corporate Sustainability and Climate Change Manager.

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

Thanks to the incentives of the Director on Board, many employees make various suggestions that will contribute to our future plans on climate-related issues. Director on Board encourage employees on climate-related issues. As a result of this encouragement, our climate-fighting plans are progressing positively. Employees who get the chance to conduct research in climate-related fields, work and develop different projects as a result of these incentives contribute to our future goals in many ways

Water

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

- Chief Operating Officer (COO)

(4.5.1.2) Incentives

Select all that apply

- Bonus – set figure

(4.5.1.3) Performance metrics

Targets

- Progress towards environmental targets

(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

It is the COO's responsibility to ensure the implementation of KPIs and operational performance indicators. Fundamental initiatives to achieve sustainable and financial development goals such as reducing fossil fuel, energy and raw material consumption and increasing the use of alternative fuels are reviewed and projected by the corporate team and the COO. These initiatives are fundamentally important in the context of climate-related issues as they will directly affect greenhouse gas emissions. Investments in climate-related risks and opportunities are projected by both the Management and the Sustainability Committee under the control of the COO, and are supported by the COO in order to carry out efficient work and achieve results. In this way, with the incentives and motivation of the COO, it is aimed to finalize climate-related issues more quickly. In this way, with the incentives and motivation of the COO, climate-related issues are concluded more quickly and effectively. The COO ensures his employees participation in international seminars where new technologies regarding renewable energy, CCUS projects and technologies are presented in order to encourage his employees on climate-related issues

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

Thanks to the COO's encouragement of employees on water-related issues, our water sustainability initiatives are progressing positively. Employees who have the opportunity to research water management strategies and participate in different projects contribute to our long-term goals. These incentives lead to the development of new approaches to water efficiency, reuse, and conservation, which are essential to achieving our future objectives
 [Add row]

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

	<p>Does your organization have any environmental policies?</p>
	<p>Select from: <input checked="" type="checkbox"/> Yes</p>

[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

Limak Cement has a clear understanding of its environmental responsibilities and is committed to taking decisive action in sustainability. The company's sustainability policy demonstrates recognition of environmental impacts, risks, and opportunities, and outlines a clear action plan to address these issues. This policy encompasses the environmental dependencies within its operations as well as across its supply chain, showcasing transparency and accountability to stakeholders. The policy is structured around three core pillars: Inclusive Development, People Person, and Healthy Planet, each addressing different aspects of sustainability while remaining interconnected 1. Inclusive Development: Limak aligns with global sustainability goals and principles, ensuring economic development that is inclusive of all humanity and the planet. This includes a commitment to innovation and stakeholder engagement in its sustainability endeavors. People Person: The policy focuses on human health and development, equal opportunity, and the creation of supportive environments for human growth. It also emphasizes social development, occupational health and safety, and gender empowerment. Healthy Planet: Limak is proactive in protecting the environment and minimizing its ecological footprint. This includes monitoring and reporting on environmental impacts, promoting energy efficiency, and addressing climate change through emission controls

(4.6.1.5) Environmental policy content

Environmental commitments

- Commitment to comply with regulations and mandatory standards
- Commitment to take environmental action beyond regulatory compliance
- Commitment to stakeholder engagement and capacity building on environmental issues

Water-specific commitments

- Commitment to control/reduce/eliminate water pollution
- Commitment to reduce water consumption volumes
- Commitment to the conservation of freshwater ecosystems

Social commitments

- Commitment to promote gender equality and women's empowerment

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

Select all that apply

- Yes, in line with the Paris Agreement
- Yes, in line with Sustainable Development Goal 6 on Clean Water and Sanitation

(4.6.1.7) Public availability

Select from:

- Publicly available

(4.6.1.8) Attach the policy

LC_Environmental_Policy.pdf

Row 2

(4.6.1.1) Environmental issues covered

Select all that apply

- Biodiversity

(4.6.1.2) Level of coverage

Select from:

- Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

- Direct operations
- Upstream value chain
- Downstream value chain

(4.6.1.4) Explain the coverage

Limak Group is fully aware that the loss of biodiversity could have a negative impact on ecosystems on a global scale and, as a result, places great importance on preserving biodiversity to maintain environmental balance. The company continues its efforts to ensure environmental sustainability while preserving biodiversity in all its activities. In this regard, Limak supports the uniqueness and diversity of natural life, assesses biodiversity impacts in operational areas, and develops biodiversity action plans. The company also implements preventive approaches to minimize the impact on biodiversity in new projects and develops practices that focus on protecting endangered or threatened species in all ongoing projects. Limak collaborates with relevant legal authorities, scientists, and local governments in biodiversity protection efforts, ensuring that local solutions and global impacts are addressed with stakeholders. It evaluates biodiversity risks for large-scale investments that could pose environmental or social risks in accordance with the Equator Principles, IFC Performance Standards, and/or EBRD Performance Requirements. Furthermore, Limak incorporates biodiversity into decision-making processes by prioritizing it among sustainability goals and encourages all employees and stakeholders to participate in biodiversity conservation efforts.

(4.6.1.5) Environmental policy content

Environmental commitments

- Commitment to comply with regulations and mandatory standards
- Commitment to take environmental action beyond regulatory compliance
- Commitment to implementation of nature-based solutions that support landscape restoration and long-term protection of natural ecosystems
- Commitment to stakeholder engagement and capacity building on environmental issues

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

Select all that apply

- Yes, in line with the Paris Agreement
- Yes, in line with another global environmental treaty or policy goal, please specify :Voluntarily

(4.6.1.7) Public availability

Select from:

Publicly available

(4.6.1.8) Attach the policy

Limak_Biodiversity_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)

Task Force on Climate-related Financial Disclosures (TCFD)

UN Global Compact

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

Limak, as a proud member of the United Nations Global Compact (UNGC), is committed to advancing sustainable practices across our operations. This year, we are taking a significant step by setting science-based targets (SBTi) to reduce our carbon footprint and align with the global effort to limit temperature rise to well below 2C, as outlined in the Paris Agreement. Given the energy-intensive nature of the cement industry, this commitment underscores our dedication to transforming our production processes toward greater efficiency and lower emissions. As part of our ongoing transparency and accountability efforts, we will disclose our sustainability-related risks and opportunities in our upcoming Sustainability Report, structured in accordance with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). This will include detailed insights into how climate risks are integrated into our business strategy, the actions we are taking to mitigate these risks, and the opportunities we are exploring to contribute to a more sustainable future, including innovations in low-carbon cement production

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

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

Select from:

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

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

Select all that apply

- Paris Agreement

(4.11.4) Attach commitment or position statement

Limak_Sustainability_Policy.pdf

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

Select from:

- No

(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

Limak Çimento has established a robust process to ensure that its external engagement activities are in line with its environmental commitments and transition plan. The company measures and reports environmental impacts across all areas of activity, setting specific goals for each sector and taking actions to improve. They focus on the development and implementation of environmentally-friendly products and services. Energy efficiency is a key priority, with ongoing monitoring and development efforts, as well as initiatives to increase the use of renewable energy sources. Limak Çimento also promotes water efficiency and awareness among stakeholders, starting with its employees. The company is proactive in calculating, verifying, and monitoring emissions from its operations to address climate change. By measuring and evaluating the economic, environmental, and social impacts of its activities, Limak Çimento takes steps to reduce any negative effects. Transparency is maintained through regular publication of sustainability reports that adhere to international standards. At the core of Limak Çimento's approach is a "Healthy Planet" oriented business mentality, which emphasizes the protection of the planet and the reduction of environmental impacts. This includes identifying potential adverse environmental factors in advance and developing methods to eliminate them. The company believes that prioritizing research and development, as well as product and process development investments, is essential to its environmental strategy. All these measures reflect Limak Çimento's commitment to conducting its business in an environmentally responsible manner and ensuring that its external engagements uphold its sustainability goals.

[Fixed row]

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

Row 1

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

Industrial Emissions Management Regulations refer to a set of rules and guidelines designed to control and reduce the environmental impact of industrial activities. These regulations are aimed at managing the emissions of pollutants, including gases, particulates, and other substances, from industrial processes to protect air, water, and soil quality.

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

Select all that apply

Climate change

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

Environmental impacts and pressures

Emissions – CO2

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

Select from:

- National

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

Select all that apply

- Turkey

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

Select from:

- Support with major exceptions

(4.11.1.7) Details of any exceptions and your organization's proposed alternative approach to the policy, law, or regulation

Current regulations in Turkey restrict the import of waste materials, with the exception of tires. However, there is a shortage of sufficient amounts of Refused Derived Fuel (RDF) in Turkey, which limits the use of sustainable fuels in industrial processes. We advocate for the controlled importation of RDF into Turkey, as this approach could provide significant environmental and economic benefits. Our recommendation is to amend the regulations to allow for the controlled importation of RDF. This would enhance the use of sustainable energy sources within the country and enable the utilization of waste as a valuable recycling resource. Additionally, controlling the import of such materials would help minimize environmental impacts and maintain high-quality standards. In this context, we urge a review and update of the industrial emissions management regulations to include provisions for the use of alternative fuels such as RDF. This aligns with our goals of reducing industrial environmental impacts and increasing waste recycling.

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

Select all that apply

- Regular meetings
- Participation in working groups organized by policy makers
- Submitting written proposals/inquiries

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

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

The Emissions Trading System (ETS) policy is directly aligned with Limak Cement's environmental commitments and our transition plan to achieve significant carbon reductions by 2030. As a company committed to sustainability, we have set clear objectives to reduce our carbon footprint in line with international climate targets and national regulations. The ETS framework, which incentivizes emission reductions through market mechanisms, is a critical tool for achieving these objectives. Our engagement with policymakers on ETS is driven by our commitment to a smooth and effective transition to a low-carbon economy. By actively participating in consultations and discussions, we aim to ensure that the ETS policy reflects the practical realities of our industry and supports the adoption of low-carbon technologies and practices. This engagement helps align our internal strategies with the regulatory framework, ensuring our transition plan remains feasible, comprehensive, and economically viable

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

Select from:

Yes, we have evaluated, and it is aligned

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

Select all that apply

Paris Agreement

Row 2

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

The Green Cement Communiqué is a regulatory framework aimed at promoting the production and use of environmentally friendly cement in the construction industry. It encourages the development and use of "green" cement, which typically includes materials with lower carbon emissions and reduced environmental impact during production, such as blended cements incorporating industrial by-products like fly ash or slag. The initiative is designed to help the cement sector reduce its carbon footprint and

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

Select all that apply

- Climate change

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

Other

- Climate transition plans
- Corporate environmental targets
- International agreement related to climate change mitigation

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

Select from:

- National

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

Select all that apply

- Turkey

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

Select from:

- Support with no exceptions

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

Select all that apply

- Regular meetings
- Participation in working groups organized by policy makers
- Submitting written proposals/inquiries

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

0

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

The Green Cement Communiqué is highly relevant to Limak Cement's environmental commitments and our transition plan towards a low-carbon future by 2030. The regulation aligns with our goal of reducing carbon emissions through the use of lower clinker-content cements, which supports both national climate targets and our internal sustainability strategy. By actively participating in discussions and providing feedback to policymakers, Limak Cement ensures that the regulation is both feasible and effective in achieving its intended environmental benefits. This engagement is informed by our commitment to reducing carbon emissions across our operations. Limak Cement has been recording and evaluating carbon emissions since 2008, and we are dedicated to implementing low-carbon technologies and best practices. Our engagement aims to contribute to a regulatory framework that facilitates a smooth transition to greener production methods while maintaining the practicality of construction standards. Currently, there are no specific regulations for the direct use of solid and demolition waste in green cement production. Without rigorous earthquake testing, products are not released to the market. Efforts are underway to establish approval for using construction and demolition waste in cement through various channels, including TÜRKAK, CPC, DOĞAKA, and relevant ministries. CPC has entered the process for accreditation, and there is a need to integrate these materials within TSE standards to facilitate their use in cement

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

Select from:

Yes, we have evaluated, and it is aligned

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

Select all that apply

Paris Agreement

Row 3

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

As Limak Cement, we have expressed our views on the water pollution control regulation to protect the country's underground and surface water resources potential and ensure their best use, and to prevent water pollution in line with sustainable development goals.

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

Select all that apply

Water

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

Environmental impacts and pressures

Water pollution

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

Select from:

National

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

Select all that apply

Turkey

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

Select from:

Support with no exceptions

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

Select all that apply

Regular meetings

Participation in working groups organized by policy makers

Submitting written proposals/inquiries

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

0

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

As highlighted in the other sections too, we are continuously following the environmental regulations. Regarding the water related ones, we align with the Water Pollution Control Regulation of Türkiye and our actions are conducted within this regulation.

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

Select from:

Yes, we have evaluated, and it is aligned

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

Select all that apply

Sustainable Development Goal 6 on Clean Water and Sanitation

[Add row]

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

Row 1

(4.11.2.1) Type of indirect engagement

Select from:

Indirect engagement via other intermediary organization or individual

(4.11.2.2) Type of organization or individual

Select from:

- Non-Governmental Organization (NGO) or charitable organization

(4.11.2.3) State the organization or position of individual

Türk Çimento Sanayicileri Birliği represents the interests of Turkey's cement industry. It works to promote and support the sector through advocacy, research, and industry collaboration. Regarding the ETS, TÇMB plays a key role in guiding and informing cement producers about regulatory developments, providing recommendations, and facilitating dialogue between industry stakeholders and regulatory bodies to ensure effective implementation and compliance with emission reduction goals.

(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

Our organization's position is consistent with the objectives of the mentioned association. We have not taken any specific actions to influence their position but remain aligned with their advocacy for regulatory changes to the national ETS legislation. We support their efforts to improve sustainable practices in the cement industry,

including enhancing waste management and SCM availability, and updating standards to align with low-carbon goals, contributing to a more effective and sustainable framework

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

123

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

This association aims to influence the national ETS legislation by advocating for regulatory changes and increased support for sustainable practices in cement production. The focus is on improving waste management, enhancing SCM availability, and updating standards to align with low-carbon objectives, thereby contributing to a more effective and sustainable ETS framework

(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

Row 2

(4.11.2.1) Type of indirect engagement

Select from:

Indirect engagement via other intermediary organization or individual

(4.11.2.2) Type of organization or individual

Select from:

- Governmental institution

(4.11.2.3) State the organization or position of individual

T.C. Ministry of Environment, Urbanisation and Climate Change. The Ministry is actively engaged in implementing policies to mitigate climate change. This includes overseeing the implementation of the Climate Law, setting emissions reduction targets, and facilitating the transition to a low-carbon economy. The Ministry also supports green technologies, enhances waste management practices, and promotes sustainable urban development to contribute to national and international climate goals

(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

Our organization's position is fully consistent with that of the concerned entity. We support the national efforts to address climate change and reduce emissions, and we have not taken any actions to influence their position. We share a common goal of promoting sustainable practices and ensuring alignment with national climate objectives

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

(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]

(4.12.1) 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:

- Other, please specify :14064 Verification Statements of Plants

(4.12.1.3) Environmental issues covered in publication

Select all that apply

- Climate change

(4.12.1.4) Status of the publication

Select from:

- Complete

(4.12.1.5) Content elements

Select all that apply

- Emissions figures
- Emission targets

(4.12.1.6) Page/section reference

The carbon footprint report has been prepared by Limak Cement Group and verified by accredited third organizations in accordance with ISO 14064-1:2018 Standards. All pages have information about our carbon emission process.

(4.12.1.7) Attach the relevant publication

14064-1 All Plants Consolidated.pdf

(4.12.1.8) Comment

We plan to disclose the data we disclosed at CDP in the ISO 14064 report we will publish this year as well.

Row 2

(4.12.1.1) Publication

Select from:

- In voluntary sustainability reports

(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
- Value chain engagement
- Dependencies & Impacts
- Public policy engagement
- Content of environmental policies

(4.12.1.8) Comment

We plan to disclose the data we disclosed at CDP in the sustainability report we will publish this year
[Add row]

C5. Business strategy

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

Climate change

(5.1.1) Use of scenario analysis

Select from:

Yes

(5.1.2) Frequency of analysis

Select from:

Annually

Water

(5.1.1) Use of scenario analysis

Select from:

Yes

(5.1.2) Frequency of analysis

Select from:

Annually

[Fixed row]

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

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

- IEA APS

(5.1.1.3) Approach to scenario

Select from:

- Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

- Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

- Acute physical
- Policy
- Market

(5.1.1.6) Temperature alignment of scenario

Select from:

- 1.5°C or lower

(5.1.1.7) Reference year

2021

(5.1.1.8) Timeframes covered

Select all that apply

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

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

Finance and insurance

- ☑ Sensitivity of capital (to nature impacts and dependencies)

Stakeholder and customer demands

- ☑ Impact of nature footprint on reputation

Regulators, legal and policy regimes

- ☑ Global targets
- ☑ Methodologies and expectations for science-based targets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

To effectively prepare for and mitigate the adverse impacts of climate change, it is crucial to forecast future climatic changes and trends based on current observations and to assess their effects on natural and human systems. Mathematical models that represent the elements of the climate system, along with their interactions and feedback loops, are employed to comprehend historical climate patterns and to project future climatic conditions. These models utilize various scenarios to predict future climate changes. At Limak Cement Group, we aim to develop a climate strategy plan informed by these models, which have been discussed and evaluated during our carbon reduction strategy committee meetings. In this process, both SRES (Special Report on Emissions Scenarios) and RCPs (Representative Concentration Pathways) are under review. When comparing SRES scenarios with RCPs in terms of concentration values, it is observed that the RCP8.5 scenario aligns closely with the A1F1 and A2 scenarios, while RCP6.0 is similar to A1B. The B2 and A1T scenarios fall between RCP4.5 and RCP6.0. RCP4.5 is parallel to the B1 scenario. However, RCP3-PD (RCP2.6) does not correspond with any SRES scenarios. For a longer-term understanding of climate change, RCP scenarios have been extended to continue until the end of the year 2300, with a simple approach and without strict criteria regarding emission and concentration levels (Meinshausen et al., 2011). In this extended framework, RCP2.6 and RCP8.5 assume fixed CO₂ emission and concentration levels after the year 2100. In contrast, RCP4.5 and RCP6.0 anticipate that CO₂ emissions and concentrations will gradually stabilize by 2150. Specifically, RCP8.5 projects that CO₂ concentration will stabilize only by 2250 at around 2000 ppm, which is nearly seven times the pre-industrial level. Conversely, RCP3-PD (RCP2.6) suggests that emissions will start to decline after 2070, leading to a gradual reduction in concentrations over time until 2300, eventually reaching around 360 ppm.

(5.1.1.11) Rationale for choice of scenario

At Limak Cement Group, we leverage both our proprietary data and external industry insights to evaluate present and future risks and opportunities impacting our operations. Recognizing carbon emissions as a critical climate-related risk for the cement industry, the Turkish government is actively promoting climate initiatives. These include setting goals to curtail greenhouse gas emissions, enacting policies, and implementing measures to address climate change, all in alignment with the global objectives outlined in the Paris Agreement. To support these aims, Turkey's initial Nationally Determined Contribution (INDC) in 2015 proposed a 21% reduction in emissions from 2012 levels, which was subsequently revised to a 41% reduction by 2030 at the COP 27 conference in November 2022. This revised target specifies a comprehensive carbon emission reduction goal of 41% by 2030, with clear sector-specific allocations. The Presidential Circular on the Action Plan, published in the Official Gazette on July 16, 2021, is a critical document for safeguarding and enhancing Turkey's position in the global supply chain, attracting green investments, boosting export competitiveness, and fostering green transformation across various policy domains. The European Green Consensus Working Group is tasked with engaging public and private stakeholders to effectively implement the Action Plan's objectives and initiatives. In parallel with the Turkish Government's efforts, Limak Cement Group meticulously records carbon emissions at each of our plants and reports the aggregate figures to the Ministry of Environment in our annual Sustainability Reports. We also calculate and verify the carbon footprint for all plants in compliance with ISO 14064-1:2018 Standards through an accredited verifier. Our Carbon Reduction Strategy Committee utilizes the SBTi's 1.5C-aligned guidance for the cement industry to inform our transition scenarios. For carbon pricing, we have adopted the estimated unit prices from the World Bank document (around US 10/tCO₂e) for our scenario analyses, due to the absence of a specific CO₂ emission price in Turkey

Water

(5.1.1.1) Scenario used

Water scenarios

- WRI Aqueduct

(5.1.1.3) Approach to scenario

Select from:

- Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

- Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

Chronic physical

Market

(5.1.1.7) Reference year

2022

(5.1.1.8) Timeframes covered

Select all that apply

2030

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

Changes to the state of nature

Stakeholder and customer demands

Impact of nature footprint on reputation

Regulators, legal and policy regimes

Global regulation

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

The WRI Aqueduct is a tool developed by the World Resources Institute that provides detailed maps and data on water risks around the globe. It evaluates risks such as water scarcity, pollution, and regulatory challenges, offering a comprehensive view of water-related threats to businesses and communities. Our companies use Aqueduct to identify potential water risks in specific regions, which is crucial for strategic planning and sustainable resource management. We utilize the WRI Aqueduct to assess and manage their water risk exposure. By understanding the water risks in our operations and supply chains, we can make informed decisions about our facility locations, implement water conservation measures, and engage in water stewardship initiatives. This proactive approach helps us to mitigate risks, improve their sustainability practices, and ensure we are operating within the growing constraints of global water resources.

(5.1.1.11) Rationale for choice of scenario

We identify where our operations, suppliers, or potential new markets are located in relation to water risks. The Aqueduct maps can pinpoint areas of high water stress, where competition for limited water resources is intense, or where water quality issues could disrupt operations. This information is critical for our company that rely heavily on water for processing. We use Aqueduct to set and achieve water stewardship goals. By understanding the local water context, we can engage in collective action with other stakeholders, such as local communities, governments, and NGOs, to address shared water challenges. This can involve improving water efficiency, investing in community water infrastructure, or supporting watershed conservation projects. Aqueduct's data helps us to stay ahead of regulatory changes and to comply with local water usage and quality standards. It also aids in transparent reporting on water risks and management strategies in sustainability reports and disclosures, which is increasingly demanded by investors and consumers. By being aware of potential water risks, we can develop and implement risk mitigation strategies to ensure business continuity. This might include diversifying water sources, enhancing water recycling and reuse, or designing products that require less water to produce.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

- RCP 4.5

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

- SSP1

(5.1.1.3) Approach to scenario

Select from:

- Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

- Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

- Acute physical
- Policy
- Market

(5.1.1.6) Temperature alignment of scenario

Select from:

- 2.5°C - 2.9°C

(5.1.1.7) Reference year

2021

(5.1.1.8) Timeframes covered

Select all that apply

- 2100

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

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

Finance and insurance

- Sensitivity of capital (to nature impacts and dependencies)

Stakeholder and customer demands

- Impact of nature footprint on reputation

Regulators, legal and policy regimes

- Global targets
- Methodologies and expectations for science-based targets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

RCP4.5 is one of the Representative Concentration Pathways, which are scenarios that outline different climate futures based on varying levels of greenhouse gas emissions. Specifically, RCP4.5 is considered a stabilization scenario, where it is assumed that global efforts to reduce emissions will lead to a stabilization of atmospheric concentrations of greenhouse gases by the year 2100. For us, understanding RCP4.5 is crucial because the production of cement is a significant source of carbon dioxide emissions, a major greenhouse gas. In the context of RCP4.5, we would need to adapt our operations to align with a future. This would likely involve investing in cleaner technologies, improving energy efficiency, and possibly incorporating alternative materials that result in lower emissions. We would also need to be prepared for potential regulatory changes that aim to limit emissions in line with RCP4.5 targets. By planning for these changes, we can ensure we remain competitive and responsible in a future where sustainability is increasingly prioritized.

(5.1.1.11) Rationale for choice of scenario

The rationale for choosing the RCP4.5 scenario strategic planning lies in our moderate and achievable pathway towards stabilizing greenhouse gas emissions. RCP4.5 presents a balanced outlook that anticipates technological advancements and policy interventions without relying on overly optimistic assumptions or drastic, immediate changes in global behavior. This scenario is particularly relevant for industries like cement production, which are inherently carbon-intensive but also essential for development and infrastructure. By aligning with RCP4.5, we plan to signal our commitment to sustainability and its willingness to invest in long-term solutions that reduce its environmental impact. The scenario assumes a gradual transition to a lower-carbon economy, which allow us to plan and implement changes at a realistic pace. This could involve incremental improvements in process efficiency, the adoption of alternative fuels, and the development of new products with reduced lifecycle emissions. The choice of RCP4.5 reflects a pragmatic approach to climate action, balancing environmental responsibility with economic viability, and ensuring our operations are resilient in a future where environmental regulations are likely to become more stringent.

[Add row]

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

Climate change

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

Select all that apply

- Risk and opportunities identification, assessment and management
- Strategy and financial planning
- Resilience of business model and strategy
- Capacity building
- Target setting and transition planning

(5.1.2.2) Coverage of analysis

Select from:

- Organization-wide

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

Scenario analysis is a critical tool in our approach to sustainability, informing the development of our R&D and innovation strategies. By evaluating a spectrum of potential future states, we can identify risks and opportunities that may arise from environmental, regulatory, and market changes. This foresight guides our technological investments, ensuring they are resilient to future shifts in the sustainability landscape. It also aids in optimizing resource use, driving innovation, and supporting financial planning. By anticipating different scenarios, we can strategically invest in new green products, alternative raw materials, and emission-reducing technologies, aligning our operations with the principles of the circular economy and industrial symbiosis. Moreover, scenario analysis prepared for evolving policy landscapes, such as the implementation of carbon pricing. It allows us to adapt our production processes and business models to comply with low-carbon regulations, maintain competitiveness, and achieve our sustainability goals. Collaborations with other sectors and technology developers are informed by these analyses, enabling us to foster partnerships that support the circular economy and contribute to the broader goal of reducing the industry's carbon footprint. Through scenario analysis, we are not only responding to current sustainability challenges but also shaping the future of the cement industry with innovative and environmentally responsible practices.

Water

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

Select all that apply

- Risk and opportunities identification, assessment and management
- Strategy and financial planning
- Resilience of business model and strategy
- Capacity building
- Target setting and transition planning

(5.1.2.2) Coverage of analysis

Select from:

- Organization-wide

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

By providing detailed water risk data, Aqueduct enables us to build internal capacity for understanding and managing water risks. Training and development programs can be informed by Aqueduct's insights, equipping employees with the knowledge to integrate water risk considerations into their roles, from operations to executive decision-making. Aqueduct's comprehensive risk assessments inform both short-term and long-term strategic and financial planning. Therefore, we can use the tool to forecast potential water-related costs, such as the need for water treatment facilities or the price of water and integrate these considerations into our financial models and investment strategies. Also Aqueduct helps us set quantifiable targets for water usage, efficiency, and quality. It also aids in developing transition plans to move towards these targets, ensuring that trajectory aligns with sustainable water management practices and reduces exposure to water risks. By understanding the water risks highlighted by Aqueduct, we can design business models and strategies that are resilient to water scarcity, quality issues, and regulatory changes.
[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

We are explicitly committing to cease all spending on and revenue generation from activities that contribute to fossil fuel expansion signifies a serious step towards sustainability goals. This commitment involves transitioning energy sources used in cement production processes to renewable alternatives, re-evaluating business processes and products reliant on fossil fuels, and adopting innovative technologies that reduce the use of these fuels. For instance, utilizing renewable energy

sources like biomass instead of coal or natural gas in the cement kilning process can decrease the demand for fossil fuels. Additionally, our cessation of revenues from activities that directly or indirectly support fossil fuel use marks a significant move towards a sustainable future.

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

Select from:

We have a different feedback mechanism in place

(5.2.8) Description of feedback mechanism

We gather feedback from shareholders on our climate transition plan which is a critical component of the strategy's success and alignment with stakeholder expectations. To facilitate this, we can establish a structured feedback mechanism that allows shareholders to provide their insights and concerns regarding our approach to reducing our carbon footprint and transitioning to more sustainable practices. This mechanism could include regular shareholder meetings, dedicated sessions during annual general meetings (AGMs), or the use of digital platforms such as online surveys and forums where shareholders can submit their feedback asynchronously. In addition to these formal channels, we also implement an advisory panel consisting of shareholders with expertise in sustainability and climate-related issues. This panel would work closely with our management to review the climate transition plan, suggest improvements, and monitor its implementation. By incorporating shareholder feedback into the decision-making process, we ensure that our climate transition plan is not only ambitious but also realistic and supported by those who have a vested interest in the company's long-term success. This collaborative approach can lead to a more robust and effective climate strategy, fostering a culture of transparency and accountability that is likely to resonate positively with all stakeholders.

(5.2.9) Frequency of feedback collection

Select from:

Annually

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

The decarbonization transition plan is founded on a set of critical assumptions and dependencies that are integral to its success. Central to the strategy is the increased utilization of alternative fuels and raw materials, particularly the sourcing of calcined calcium oxide from alternative sources to reduce emissions from clinker production. The plan is heavily reliant on technological advancements, including the enhancement of thermal and energy efficiency and the adoption of Carbon Capture Use and Storage (CCUS) technologies, which are expected to play a significant role in emission reductions by 2040 and 2050. The integration of green hydrogen as a boosting fuel is another cornerstone of the plan, contingent upon the scalability and cost-effectiveness of green hydrogen production. Additionally, the strategy assumes a substantial shift towards renewable energy to meet our electricity needs and the feasibility of concrete mix optimization to reduce the carbon footprint of concrete production. The roadmap also hinges on the successful increase in clinker substitution with materials like calcined clay and carbonated materials, which must be available and accepted in the market to meet the set targets. Aligning with CEMBUREAU's sector-wide decarbonization targets, the plan incorporates a comprehensive approach that includes CO2 emission reductions through various means, such as alternative fuels, thermal efficiency improvements, and CCUS. The execution of these initiatives is dependent on a supportive regulatory environment and favorable policy frameworks that incentivize the transition to low-carbon

technologies. Economic viability remains a critical dependency, with the cost-effectiveness of decarbonization levers being a determining factor for the plan's implementation. Lastly, our plan presupposes a market demand for low-carbon products and consumer acceptance, which are essential for the overall success of our decarbonization efforts.

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

We made tangible progress against our transition plan as disclosed in both current and previous reporting periods. We have been actively working towards decreasing emissions intensity per ton of clinker produced, with a targeted reduction of 13% by 2030. This goal is being pursued through the increased use of alternative fuels and raw materials, as well as improvements in thermal efficiency and the adoption of renewable energy sources. By 2040, the anticipated savings are expected to reach 53%, with green hydrogen playing a crucial role as a boosting fuel to increase the thermal substitution rate of alternative fuels. Additionally, the introduction of CCUS technology is projected to contribute 22.4% to the total emission reductions by 2040. By 2050, the aim is to decrease CO2 emissions intensity by 77.3% per ton of clinker, with CCUS technologies accounting for 37.5% of the total emissions reductions. In the realm of cement production, we set ambitious targets for clinker substitution, aiming to reduce the clinker amount in cement from 84% in 2021 to 73% by 2030, and further to 58% by 2050. This strategy is expected to yield a CO2 saving of -93 kg CO2/t cement by 2030, increasing to -220 kg CO2/t cement by 2050. Renewable energy is also a significant part of the transition plan, with the goal for it to cover 54% of our total electricity needs by 2030, and 90% by 2050, which includes powering green hydrogen production and CCUS units. These efforts are in line with the overarching goal of achieving net-zero emissions by 2050, with a comprehensive approach that encompasses clinker and cement production, concrete optimization, and the incorporation of renewable energy solutions.

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

Limak Cement Carbon Net Zero Road Map.pptx

(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, water issues are given paramount importance due to the industry's substantial water usage for processes. Recognizing the impact of water usage on both the environment and local communities, our plan includes a comprehensive water management strategy. This strategy focuses on reducing consumption, preventing pollution, and ensuring the sustainable use of water resources. We incorporate advanced water recycling and reuse technologies to minimize freshwater withdrawal. Additionally, we invest in rainwater harvesting systems and the treatment and use of municipal and industrial wastewater, thereby lessening our dependency on local water supplies and reducing our water footprint. Moreover, our plan emphasizes the importance of assessing water-related risks, including scarcity and quality issues, which are exacerbated by climate change. We conduct regular water risk assessments to identify potential impacts on our operations and the surrounding ecosystems. Based on these assessments, we develop targeted actions to mitigate risks, such as enhancing water storage capacity to secure supply and improving the efficiency of water-intensive processes. We also engage with local stakeholders, including communities, governments, and environmental organizations, to collaborate on shared water conservation initiatives and to support regional water sustainability. Through these efforts, we aim to not

only ensure the resilience of our operations against water-related challenges but also to contribute positively to the water security of the regions in which we operate. Our commitment to water stewardship is integral to our climate transition plan, reflecting our dedication to environmental sustainability and social responsibility.
[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

Climate risks compel cement companies to navigate a complex landscape of increased regulatory compliance costs, shifting product demands towards sustainable materials. Therefore, the escalating climate-related risks necessitate the global adoption of mitigation strategies, with carbon pricing emerging as a significant short-term challenge for the cement industry due to the additional financial burden it imposes. However, if carbon pricing is designed and executed effectively, it could significantly bolster efforts to combat climate risks. Accelerating R&D to reduce clinker usage in cement production is crucial, as clinker manufacturing is a major source of carbon emissions. Equally important is the need to enhance customer awareness; as understanding of climate change grows, consumers increasingly opt for low-carbon products for their projects. In response to the European Green Deal and the Paris climate agreements, Limak Cement Group has broadened its strategies to include greenhouse gas reduction. Our laboratory, now an R&D Center, focuses on developing "Low Carbon" products. Part of our commitment involves calculating our carbon footprint to identify emissions and implementing measures to reduce greenhouse gases by assessing potential risks.

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

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

Exploring alternative fuel sources like RDF (Refuse-Derived Fuel) and biomass presents a promising avenue for reducing both CO2 emissions and fuel supply costs. However, the success of this approach hinges on securing a reliable supplier to ensure uninterrupted operations. The proliferation of RDF and biomass production facilities in Turkey is essential, as the current number is insufficient for widespread integration. Nonetheless, these alternative fuels can serve as supplementary options. At Limak Cement Group, we made a significant stride by investing in our AF (Alternative Fuel) Feeding system at our Balıkesir factory, Anka factory and Trakya factory, aiming to lower our greenhouse gas emissions and foster a circular economy. This move aligns with our Net Zero carbon target, and following the necessary legal measurements and permits, we have begun utilizing low-carbon-emission fuels derived from domestic, tire, and industrial waste. In our pursuit of industrial symbiosis, we are utilizing waste with high mineral content from various sectors as alternative raw materials, achieving a 32% increase in usage compared to 2022. From 2022 to 2023, our group-wide alternative fuel use has increased 198%. Our supply chain department is crafting new strategies to source alternative

fuels with optimal properties at the most economical prices. Limak Cement recognizes that addressing climate change demands multi-level collaboration. Minimizing our ecological footprint is a key priority in our climate change mitigation efforts.

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

Our commitment to R&D extends beyond the laboratory, with industrial-scale trials that underscore the significance of both material and moral support for R&D initiatives and low-carbon cement production. In 2022, we established an R&D center to prioritize carbon reduction and CCUS (Carbon Capture, Utilization, and Storage) studies. Dedicated project teams and collaborations have been formed to tackle these critical areas. Following our application to the Ministry of Industry and Technology, our R&D department was officially recognized as a registered R&D Center on in 2022. The R&D team is engaged in enhancing products and systems, integrating innovative technologies like 3D concrete printers, and embracing circular economy and digital transformation principles in line with industrial symbiosis. In 2023, we have started to have a ground for using construction demolition waste to produce low-carbon cement and we are planning to realize this next year. This center serves as the hub for Limak Cement's efforts to reduce emissions, embodying a carbon capture and zero waste philosophy, as we work towards our 2050 Net Zero Carbon targets.

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

To effectively address climate-related risks, it is essential to prioritize low carbon emissions throughout every stage of cement production. Substituting traditional raw materials and fuels may necessitate adjustments in the manufacturing process, but these changes are justifiable given the resultant reduction in emissions. Moreover, it is crucial to stay abreast of the best available technologies to ensure their seamless integration into existing systems, further enhancing sustainability efforts. For water sides, Water stress poses a multifaceted challenge to our companies, disrupting production processes that rely heavily on water for cooling, dust suppression, and slurry preparation. This scarcity can lead to increased operational costs as we seek alternative water sources or invest in recycling and treatment technologies. Quality control may also suffer if water quality deteriorates, potentially compromising the integrity of the cement.

[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
- Access to capital
- Capital allocation
- Capital expenditures
- Acquisitions and divestments

(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

In response to the rapid economic, social, and environmental changes over the past two years, Limak Group of Companies has updated its sustainability approach to reflect its commitment to environmental and social awareness on a healthy planet. Recognizing the growing climate-related risks, the company now incorporates environmental considerations into investment feasibility studies and is reengineering existing factories to reduce emissions. With Turkey's impending carbon pricing mechanism as part of its commitment to the Paris Climate Agreement and Green Deal, Limak is focusing on alternative raw materials and fuels like RDF and biomass to lower carbon emissions and costs. These sustainability strategies not only enhance the company's reputation but also provide advantages in financial endeavors such as grants and loans. The Risk Identification Team within Limak's decarbonization committee is tasked with identifying risks associated with the Emissions Trading System (ETS) and monitoring the global carbon market to assess potential impacts on the company's investments and green financing eligibility. The team also keeps abreast of developments related to the Carbon Border Adjustment Mechanism (CBAM) through various international and domestic channels, ensuring compliance with changing taxation systems and regulations that could affect Limak Cement's operations and supply chain. This comprehensive approach to risk management includes regular reviews of legislation, industry announcements, and carbon reduction trends, allowing for informed decision-making in direct costs, capital expenditures, purchasing, and capital access planning. For water related risks and opportunities, such as scarcity and quality issues, can significantly influence a financial planning across various dimensions. For instance, reduced water availability can constrain production processes, potentially diminishing revenues, while the need to secure alternative water sources or invest in recycling technologies can inflate direct costs. Indirect costs may also rise due to higher insurance premiums, regulatory fines, and reputational impacts associated with water mismanagement. Capital expenditures are likely to increase investing in water-efficient infrastructure to mitigate risks, which may lead to a reallocation of capital away from other business areas.

[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: <input checked="" type="checkbox"/> Yes	Select all that apply <input checked="" type="checkbox"/> 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

(5.4.1.5) Financial metric

Select from:

CAPEX

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

390000000

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

33

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

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

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

Organization's climate transition is based on its decarbonization plans for 2025, 2030, 2040, and 2050. Especially, we are working hard to reach 2050 net zero target that we have also committed through Science Based Target Initiative (SBTi). The total carbon reduction rates have been calculated for the target years. The investment plans have been detected line by line to decrease our carbon emission. Therefore, we have calculated the CAPEX need for the following period as well. The calculation and detection of these investments and plans have been internally conducted considering the national and international laws and regulations together with the company's future plans both financially and operationally. We are, for sure, following the international financial reporting standards and national ones, and our financial metrics are regulated based on these standards. Still, considering the current and future numbers given here might be considered the company's alignment with national and international standards. In conclusion, although we are not officially conducting the EU taxonomy, we are indicating our green transition and climate change spendings and similar spendings are detailly followed and tracked within the SAP system and SAP codes. These spendings and other financial instruments for our organization's climate transition are being regularly reported.

[Add row]

(5.4.3) Provide any additional contextual and/or verification/assurance information relevant to your organization's taxonomy alignment.

(5.4.3.2) Additional contextual information relevant to your taxonomy accounting

Our taxonomy accounting is following the International Financial Reporting Standards (IFRS), and we are reporting all our necessary financial data such as revenue, spending, EBITDA, EBITDA margin, cash flow, debt, etc. based on the IFRS. In the meantime, in order to comply with the national requirements and necessities in the financial side, the National Financial Reporting Standards are also followed by our accounting departments. In this way, we become able to be audited by national and international companies appropriately within the scope of different and pairing standards

[Fixed row]

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

(5.5.1) Investment in low-carbon R&D

Select from:

Yes

(5.5.2) Comment

At Limak Cement's R&D department, we prioritize projects that promote industrial symbiosis and circular economy principles, recognizing their critical role in achieving sustainability. The cement sector's heavy reliance on raw materials necessitates a responsible resource usage and a zero-waste philosophy. To this end, Limak Cement is actively engaged in research and pilot production to identify alternative raw materials that can help mitigate carbon emissions. With the rise in greenhouse gas emissions posing a significant threat to the cement industry and exacerbating the climate crisis, our R&D and innovation efforts are focused on developing new green products and technologies aimed at reducing emissions. Our projects strive to embody the circular economy model by repurposing waste from one industry as a primary or secondary input for another, fostering industrial symbiosis. Our ongoing research involves partnerships with government agencies, academic institutions, and private sector companies engaged in project-based work. For instance, one collaborative project with a government entity explores the use of mining waste as a substitute raw material in cement production, which preliminary results indicate can lead to substantial reductions in carbon emissions. Additionally, Limak collaborates with universities on projects submitted to grant programs like Horizon Europe and serves as an industrial partner, supplying materials for carbon-focused R&D studies conducted on smaller budgets at these institutions.

[Fixed row]

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

Row 1

(5.5.1.1) Technology area

Select from:

Other, please specify :Innovative building technologies

(5.5.1.2) Stage of development in the reporting year

Select from:

Full/commercial-scale demonstration

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

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

4348762.66

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

25

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

Our central R&D laboratory continues its path as accredited as of 2022. At Limak Cement R&D laboratories, extensive analysis and experiments are conducted to contribute to the low-carbon roadmap by developing green products in line with the United Nations Sustainable Development Goals. These studies at the Limak Cement R&D Center (LCTO) are establishing the foundation for innovative and sustainable solutions. A key focus of these efforts is the 3D concrete printing technology. 3D concrete printing provides an efficient and eco-friendly alternative to traditional construction methods. This innovative technology is reshaping conventional building practices by making construction faster, more sustainable, and cost-effective. It enables the creation of complex designs, accelerates the building process, and reduces human error, enhancing on-site occupational safety. Most importantly, 3D printing minimizes material waste and lowers CO2 emissions, making it a greener solution compared to conventional construction techniques. In this context, LimakCement 3DC, a low-carbon premix mortar series designed for use in gantry-type 3D concrete printers, stands out as one of the novel green products developed at LCTO. LimakCement 3DC combines the precision and efficiency of 3D concrete printing with the potential for complex design and rapid construction. The use of low-carbon CEMPLUS cement in the formulation not only meets the structural needs of 3D-printed elements but also reduces carbon emissions in the construction industry.

Row 2**(5.5.1.1) Technology area**

Select from:

 Alternative low-CO2 cements/binders**(5.5.1.2) Stage of development in the reporting year**

Select from:

 Applied research and development

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

6.24

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

1372224.99

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

13

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

Our central R&D laboratory continues its path as accredited as of 2022. Our R&D investment in developing eco-friendly cement using colemanite is closely aligned with our climate commitments and sustainability goals. In the laboratory-scale research, we are focused on reducing the sintering temperature. This reduction aims to decrease fuel consumption and lower CO2 emissions associated with traditional cement production methods. By optimizing conditions for alite and active belite phase formation, we can enhance the early and late strength of the resulting product. Additionally, our approach leverages industrial symbiosis by utilizing colemanite and minerals coming from waste material, which transforms these by-products into valuable resources. This strategy not only minimizes environmental waste but also promotes the efficient use of local materials, reinforcing our commitment to a circular economy. As we conduct these laboratory experiments, we aim to gather critical data that will inform larger-scale production and help us set new goals for sustainable practices in the cement industry. This project exemplifies our dedication to developing innovative materials that are environmentally responsible and high performing for a greener future.

Row 6

(5.5.1.1) Technology area

Select from:

Alternative low-CO2 cements/binders

(5.5.1.2) Stage of development in the reporting year

Select from:

Basic academic/theoretical research

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

7.69

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

1691599

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

10

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

Our central R&D laboratory continues its path as accredited as of 2022. At Limak Cement Group, we are actively engaged in research across all our factories to explore the use of alternative raw materials derived from the waste and by-products of other energy-intensive industries. Our efforts have led to industrial-scale cement production trials utilizing a variety of waste materials, including plastics industry waste, electric arc furnace slag from the iron and steel industry, sewage sludge from Organized Industrial Zones, marble industry waste, construction and demolition debris, bottom ash from thermal power plants, and petroleum drilling waste. We continue to use alternative raw materials that yield promising results, and we are working towards certification or patenting of these products under the right conditions. In line with our commitment to a zero-waste philosophy and reducing carbon emissions, we are collaborating with regional Development Agencies to identify methods that can lower the temperature required for clinker production. As part of our short-term strategy, we plan to become an industrial partner in project consortia that will participate in the Cluster 5 Climate, Energy, and Mobility calls under the Horizon Europe program, furthering our dedication to sustainable innovation and environmental stewardship.

[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)

3.9

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

5.59

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

0.01

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

0.01

(5.9.5) Please explain

As a group, we undertake a variety of annual projects that have received approval, encompassing investments, enhancements, modifications, and efficiency improvements. This includes all investment and infrastructure projects that arise spontaneously outside of the budget and are sanctioned by the CAPEX commission, as well as pre-purchase activities for maintenance, operation, and fixture materials. These projects also involve budgeting and cash flow tasks that need to be executed. Our factories have developed projects focused on water recovery and the efficient utilization of water resources. Following technical compliance reports, these projects are slated for investment. For instance, initiatives are in place to expand the number of settling basins to collect and recycle surface water and to install appropriate metering systems to ensure water is used judiciously. The water related opex value remained very low compared to the total opex value.

[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: <input checked="" type="checkbox"/> Yes	Select all that apply <input checked="" type="checkbox"/> 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

- Incentivize consideration of climate-related issues in risk assessment
- Influence strategy and/or financial planning

(5.10.1.3) Factors considered when determining the price

Select all that apply

- Alignment to international standards
- Alignment to scientific guidance
- Alignment with the price of a carbon tax
- Existing or pending legislation

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

When determining the carbon price within existing or pending legislation, the calculation involves analyzing the regulatory framework for carbon emissions. This includes reviewing cap-and-trade systems, carbon taxes, and other instruments that price carbon. Key assumptions include the stability of current laws, the likelihood of new legislation, and the trajectory of regulatory changes. The goal is to align the carbon price with legislative intent, often aimed at reducing greenhouse gas emissions and fostering a low-carbon economy. In addition to legislation, the carbon price is shaped by scientific guidance, international standards, and carbon tax rates. Guidance from bodies like the IPCC informs pricing strategies. When considering carbon taxes, assumptions include their effectiveness in reducing emissions, their acceptance by businesses and consumers, and their economic impact. The calculation involves economic modeling, factoring in emission reduction costs, the social cost of carbon, and the role of market mechanisms in driving innovation. By integrating these factors, the carbon price reflects the true cost of emissions, encouraging sustainable practices across industries.

(5.10.1.5) Scopes covered

Select all that apply

- Scope 1
- Scope 2

(5.10.1.6) Pricing approach used – spatial variance

Select from:

- Uniform

(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

Regulatory changes are a primary driver of shifts in the internal carbon price. As governments around the world implement more stringent environmental regulations and carbon taxes, we may need to increase their internal carbon price to reflect the higher costs of compliance and potential penalties for exceeding emissions limits. Market conditions also play a significant role. The supply and demand for carbon credits, the availability of renewable energy sources, and the overall economic landscape can all influence the cost of carbon. For instance, if the demand for carbon credits rises or the cost of renewable energy falls, this could affect the internal carbon price. Technological advancements are another factor that can lead to changes in the internal carbon price. As new technologies emerge that enable more efficient energy use or carbon capture, the cost of reducing emissions may decrease, potentially leading to adjustments in the internal carbon price. We consider all these methodological aspects and assumptions

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

234

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

258

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

Select all that apply

- Operations
- Risk management

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

Select from:

Yes, for some decision-making processes, please specify :Within the necessities of national and international regulations, our decision-making processes are affected by upcoming carbon taxes and current laws.

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

15

(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

To effectively monitor and evaluate an internal carbon pricing approach, we establish a robust framework that encompasses several key components. Firstly, we set clear objectives to articulate the purpose and desired outcomes of the internal carbon pricing mechanism, such as reducing greenhouse gas emissions, driving investment in low-carbon technologies, or preparing for future regulatory requirements. Gathering relevant data is crucial; this includes emissions data, operational data, and financial data to accurately price carbon emissions and assess their impact on the business. Performance tracking against predefined targets allows us to measure progress and make data-driven decisions. Regular reviews of the carbon pricing strategy are essential to ensure it remains relevant and effective in the face of evolving market conditions and regulatory landscapes.

[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:	Select all that apply

	Engaging with this stakeholder on environmental issues	Environmental issues covered
	<input checked="" type="checkbox"/> Yes	<input checked="" type="checkbox"/> Climate change <input checked="" type="checkbox"/> Water
Customers	Select from: <input checked="" type="checkbox"/> Yes	Select all that apply <input checked="" type="checkbox"/> Climate change <input checked="" type="checkbox"/> Water
Investors and shareholders	Select from: <input checked="" type="checkbox"/> Yes	Select all that apply <input checked="" type="checkbox"/> Climate change <input checked="" type="checkbox"/> Water
Other value chain stakeholders	Select from: <input checked="" type="checkbox"/> Yes	Select all that apply <input checked="" type="checkbox"/> Climate change <input checked="" type="checkbox"/> Water <input checked="" type="checkbox"/> Plastics

[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

Impact on pollution levels

(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

For tier 1 suppliers, we assess suppliers' environmental impact based on resource use, waste, and material sustainability. Those exceeding set thresholds, like high carbon emissions or deforestation, are classified as having substantive impacts. This threshold is based on industry benchmarks and our sustainability goals. We engage these suppliers to promote greener practices, setting expectations for improvement. Failure to comply may lead to contract termination.

(5.11.1.5) % Tier 1 suppliers meeting the thresholds 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

602

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
- Impact on pollution levels

(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

For tier 1 suppliers, we assess suppliers' environmental impact based on resource use, waste, and material sustainability. Those exceeding set thresholds, like high carbon emissions or deforestation, are classified as having substantive impacts. This threshold is based on industry benchmarks and our sustainability goals. We engage these suppliers to promote greener practices, setting expectations for improvement. Failure to comply may lead to contract termination.

(5.11.1.5) % Tier 1 suppliers meeting the thresholds 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

602
[Fixed row]

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

Climate change

(5.11.2.1) Supplier engagement prioritization on this environmental issue

Select from:

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

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

Select from:

We engage with all suppliers

(5.11.2.4) Please explain

Engaging with our suppliers on regulatory compliance is essential for ensuring that all parties adhere to the necessary legal and ethical standards. This process involves regular audits, certification reviews, and continuous monitoring to ensure suppliers meet requirements related to labor laws, environmental regulations, and safety standards. By enforcing compliance, companies can mitigate legal risks, maintain product quality, and uphold their reputation in the market. In addition to compliance, we focus on supplier performance improvement, business risk mitigation, and addressing environmental vulnerabilities. Performance improvement efforts aim to enhance quality, cost-effectiveness, and innovation through setting clear metrics and providing feedback. Our risk mitigation strategies involve identifying potential supply chain disruptions and developing contingency plans to ensure stability. We assess and work with suppliers to minimize their environmental impact, promoting sustainability and reducing the ecological footprint of the supply chain. These proactive measures not only improve the supply chain's efficiency and resilience but also align with the growing emphasis on corporate social responsibility and environmental stewardship.

Water

(5.11.2.1) Supplier engagement prioritization on this environmental issue

Select from:

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

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

Select from:

We engage with all suppliers

(5.11.2.4) Please explain

Improving our supplier performance is equally vital, with actively working with our suppliers to refine quality, timeliness, cost-effectiveness, and capacity for innovation. This collaborative process often involves establishing clear performance indicators and offering constructive feedback, which ultimately enhances the overall value chain. In parallel, we prioritize business risk mitigation and product safety to shield against potential supply chain disruptions and ensure consumer safety. Our risk mitigation strategies include scrutinizing suppliers for financial solvency, geopolitical stability, and over-reliance on single sources, while also

preparing backup plans to maintain supply chain continuity. Product safety focuses on rigorous testing and compliance checks to prevent consumer hazards. Additionally, the increasing concern over water-related vulnerabilities prompts to engage with suppliers on water stewardship. This involves assessing water usage, addressing potential scarcity or contamination issues, and implementing sustainable water management practices. Such proactive measures not only fortify the supply chain against environmental challenges but also align with global sustainability goals.

[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 environmental requirements related to this environmental issue. This strategic shift will involve developing and implementing standards for sustainable material use, waste reduction, and recycling as part of our purchasing policies. The goal is to encourage eco-friendly practices throughout the supply chain, reduce our environmental footprint, and align with global sustainability trends and consumer expectations for responsible sourcing

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 environmental requirements regarding to this water related issue. This initiative will establish guidelines for efficient water use, wastewater treatment, and water footprint reduction that suppliers will need to meet. The goal is to enhance the sustainability of our supply chain, minimize the impact on water resources, and respond proactively to the environmental challenges posed by water management.

[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:

- Setting a science-based emissions reduction target

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

- On-site third-party audit

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

Select from:

- 100%

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

Select from:

100%

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

Select from:

None

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

Select from:

None

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

Select from:

Suspend and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:

100%

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply

Re-integrating suppliers back into upstream value chain based on the successful and verifiable completion of activities

(5.11.6.12) Comment

Reintegrating suppliers into the value chain after completing verified sustainability activities is vital for enhancing our supply chain's environmental performance. This process starts with a detailed verification, ensuring they meet our environmental standards and align with climate goals through audits, reports, or certifications. Once suppliers demonstrate compliance, such as improving energy efficiency or responsible waste management, they can be reintegrated. This isn't just resuming

business but forming a more sustainable partnership with continuous monitoring and collaboration on sustainability initiatives. Reintegration strengthens supply chain resilience, encourages other suppliers to commit to sustainability, and drives industry-wide improvements. It also showcases to stakeholders our genuine commitment to promoting a greener economy and fulfilling our environmental and social governance (ESG) goals.

Water

(5.11.6.1) Environmental requirement

Select from:

- Setting a science-based emissions reduction target

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

- Off-site third-party audit

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

Select from:

- 100%

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

Select from:

- 100%

(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:

- Less than 1%

(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:

- Less than 1%

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

Select from:

- Suspend and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:

- 100%

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply

- Re-integrating suppliers back into upstream value chain based on the successful and verifiable completion of activities

(5.11.6.12) Comment

Reintegrating suppliers into the upstream value chain based on their successful management of water-related issues is an essential aspect of our commitment to sustainability. Suppliers who have demonstrated effective water stewardship are evaluated for re-entry into our supply network. This evaluation involves verifying that they have completed activities such as reducing water consumption, preventing water pollution, and ensuring the sustainable use of water resources. The verification process may include site inspections, review of water usage data, and assessment of adherence to international water management standards. Once a supplier is deemed to have met our water sustainability criteria, we work to reintegrate them into our value chain in a way that supports ongoing water conservation efforts. This reintegration is coupled with continuous improvement requirements and regular monitoring to ensure that water management practices remain effective and aligned with our environmental objectives. By doing so, we aim to foster a culture of water responsibility within our supply chain, encouraging all suppliers to manage water resources thoughtfully and efficiently. This approach not only helps to mitigate water-related risks but also aligns with global efforts to address water scarcity and quality challenges, reinforcing our company's reputation as a leader in sustainable water management within the cement industry.

[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:

- Adaptation to climate change

(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

Innovation and collaboration

- Collaborate with suppliers on innovative business models and corporate renewable energy sourcing mechanisms

(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:

- None

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

Our engagement with tier 1 suppliers on climate-related issues is a critical component of our sustainability strategy at Limak Cement. We recognize that our environmental impact extends beyond our direct operations, and as such, we actively collaborate with our suppliers to ensure that our climate commitments are upheld throughout the supply chain. By integrating our innovative approach to using Construction and Demolition Waste (C&DW) in cement production, we are leading by example and encouraging our suppliers to adopt similar sustainable practices. This not only helps in reducing the overall carbon footprint of the cement

industry but also fosters a shared responsibility for environmental stewardship. Our engagement with suppliers involves continuous dialogue, sharing best practices, and setting clear expectations for sustainability performance, which are aligned with our climate transition plan and our goal of achieving net-zero emissions by 2050. The effect of our engagement with tier 1 suppliers on selected environmental actions has been transformative. By involving our suppliers in our journey towards sustainability, we have created a ripple effect that amplifies our climate efforts. Our suppliers are increasingly aware of the importance of reducing emissions and are motivated to innovate and implement more sustainable practices within their operations. This collaborative approach not only enhances the sustainability of our supply chain but also contributes to a broader industry-wide shift towards greener practices. As our suppliers adopt measures such as waste recycling, energy efficiency, and the use of alternative materials, they not only improve their own environmental performance but also contribute to the collective goal of mitigating climate change. Our engagement with suppliers thus plays a vital role in driving environmental action and ensuring that our climate commitments are reflected across all tiers of our supply 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 : Compliance with ISO 14001 and ISO 14064

(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:

- Total water withdrawal volumes 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

Innovation and collaboration

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

(5.11.7.4) Upstream value chain coverage

Select all that apply

Tier 1 suppliers

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

Select from:

76-99%

(5.11.7.7) % 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

As Limak Cement, our approach to water-related issues is deeply integrated into our sustainability and environmental stewardship efforts, extending to our engagement with tier 1 suppliers. We understand that water is a critical resource in the cement production process and that its conservation and management are essential to our climate commitments. Therefore, we actively work with our suppliers to promote responsible water use and to implement water-saving technologies and practices. es sharing knowledge on water management strategies, setting water usage benchmarks, and encouraging the adoption of closed-loop water systems that reduce waste and increase recycling rates. By prioritizing water efficiency and stewardship, we aim to minimize our water footprint and ensure the sustainable use of water resources throughout our supply chain. The impact of our engagement with tier 1 suppliers on water-related issues is significant. Through collaborative efforts, we have seen suppliers take concrete steps to improve their water management, such as investing in water-efficient equipment, enhancing monitoring and reporting of water usage, and adopting best practices for reducing water consumption. These actions not only contribute to the conservation of water resources but also align with our broader environmental goals and climate transition plan. By addressing water-related issues with our suppliers, we are not only mitigating risks associated with water scarcity and quality but also reinforcing our commitment to sustainable operations. This collective action towards better water stewardship is essential for building resilience against climate-related water challenges and for ensuring the long-term sustainability of our operations and those of our suppliers.

(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 :Compliance with ISO 14001

(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:

Customers

(5.11.9.2) Type and details of engagement

Education/Information sharing

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

Share information about your products and relevant certification schemes

Share information on environmental initiatives, progress and achievements

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%

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

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

Engaging with stakeholders is a strategic priority for Limak Cement, as we recognize the importance of collaboration in addressing climate-related issues and advancing our sustainability goals. Our rationale for engaging with these stakeholders is rooted in the belief that collective action and knowledge-sharing are crucial for driving innovation and implementing effective climate solutions. We focus on partnerships that can directly contribute to the development of low-carbon products and the integration of advanced technologies such as Carbon Capture, Utilization, and Storage (CCUS). For instance, our collaboration with Hacettepe University's Civil Engineering Department aims to optimize the use of waste in low-carbon cement and concrete mix designs, with a particular emphasis on recycling construction demolition wastes. Similarly, our engagements with METU and 9 Eylül University are centered around energy optimization and the development of low-carbon concrete structures. These academic partnerships are vital for enhancing our R&D capabilities and ensuring that our products and processes are at the forefront of sustainability. In addition to academic collaborations, our engagement with TÜBİTAK MARMARA RESEARCH CENTER (MAM) focuses on technical discussions regarding the integration of low-TRL carbon capture technologies into the cement sector and the evaluation of potential carbon storage sites in Turkey. By participating in national and international events and maintaining active roles in NGOs like TÜRKÇİMENTO, we stay informed about innovative technologies and developments, while also influencing sector-wide decisions on climate-related issues. Our involvement in the Pre-Assessment Support Project of the Turkish Circular Economy Platform and the Industrial Symbiosis Project with ETI Mining Company and the South Marmara Development Agency exemplifies our commitment to circular economy practices. These engagements allow us to explore alternative raw material sources, such as marble residuals and boron mineral by-products, and to evaluate their use in creating low-carbon cement and concrete products. By collaborating with these diverse stakeholders, we not only contribute to the greater good in climate action but also reinforce our position as a sector leader in sustainability and innovation.

(5.11.9.6) Effect of engagement and measures of success

Our collaborations with esteemed universities have been instrumental in developing innovative low-carbon products, which are crucial for our commitment to reducing our environmental impact. The insights gained from these partnerships have directly contributed to the optimization of our cement and concrete mixes, enhancing our sustainability profile. Working with TÜBİTAK MAM has significantly advanced our understanding and potential implementation of CCUS technologies, ensuring we are well-prepared for future emission reduction requirements. Our active role in industry events and with organizations like TÜRKÇİMENTO keeps us at the cutting edge of climate-related discussions, allowing us to shape the sector's approach to climate change. Projects like the Pre-Assessment Support Project and the Industrial Symbiosis Project have been pivotal in identifying alternative, sustainable raw materials, which supports our transition to a circular economy model and lessens our dependence on conventional resources. The success of our engagement is reflected in the seamless incorporation of these sustainable practices into our operations, the progress in our research and development efforts, and our reinforced position as a leader in environmental responsibility within the cement sector. These collaborative efforts underscore our dedication to collective climate action and the significant strides we are making towards our environmental objectives.

Water

(5.11.9.1) Type of stakeholder

Select from:

- Customers

(5.11.9.2) Type and details of engagement

Education/Information sharing

- Educate and work with stakeholders on understanding and measuring exposure to environmental risks
- Run an engagement campaign to educate stakeholders about the environmental impacts about your products, goods and/or services
- Share information about your products and relevant certification schemes
- Share information on environmental initiatives, progress and achievements

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

Engaging stakeholders is crucial for our companies, to ensure sustainable water management and align with broader environmental and social governance (ESG) goals. The fundamental reason for engaging various stakeholders, including local communities, governments, investors, and non-governmental organizations (NGOs), stems from the multifaceted impact of water usage and management on both the environment and society. By involving stakeholders in discussions about water metrics, companies can acquire valuable insights into local water challenges, expectations for sustainable water use, and potential collaborative solutions. This engagement aids in identifying and prioritizing water-related risks and opportunities, ensuring that water management strategies are comprehensive and take into account the needs and concerns of all affected parties. The scope of engagement with stakeholders regarding water metrics typically includes consultation, collaboration, and communication activities. Consultation involves seeking feedback from stakeholders to understand their perspectives on water management practices and impacts. This can be achieved through methods such as surveys, interviews, and participatory workshops. Collaboration may involve working with local communities, governments, and other organizations on joint water conservation projects or initiatives aimed at improving water quality and accessibility. Communication is also a critical component, with companies regularly sharing information about their water usage, conservation efforts, and progress towards water-related targets with stakeholders. This ongoing dialogue ensures that the company's water management strategies remain aligned with stakeholder expectations and evolving environmental standards. Through this comprehensive approach to stakeholder engagement, companies can effectively navigate the complexities of water stewardship, contributing to the sustainable management of this vital resource while also supporting their operational and sustainability objectives.

(5.11.9.6) Effect of engagement and measures of success

Our measures of success include the degree of innovation and collaborative efforts resulting from stakeholder interactions. The introduction of new water-saving related educations, seminars and the establishment of partnerships for regional water conservation projects, are tangible outcomes that signal progress. Positive stakeholder feedback, ongoing support, and recognition from the community and regulatory agencies further validate the effectiveness of our water management strategies. Ultimately, the overarching measure of success is the long-term health and sustainability of local water resources, indicating a beneficial impact on the local watershed and community. By achieving these measures of success, we demonstrate our role in reducing water-related risks and our contribution to environmental sustainability.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

- Investors and shareholders

(5.11.9.2) Type and details of engagement

Education/Information sharing

- Educate and work with stakeholders on understanding and measuring exposure to environmental risks
- Share information about your products and relevant certification schemes
- Share information on environmental initiatives, progress and achievements

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%

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

- 76-99%

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

Engaging with stakeholders is a strategic priority for Limak Cement, as we recognize the importance of collaboration in addressing climate-related issues and advancing our sustainability goals. Our rationale for engaging with these stakeholders is rooted in the belief that collective action and knowledge-sharing are crucial for driving innovation and implementing effective climate solutions. We focus on partnerships that can directly contribute to the development of low-carbon products and the integration of advanced technologies such as Carbon Capture, Utilization, and Storage (CCUS). For instance, our collaboration with Hacettepe University's Civil Engineering Department aims to optimize the use of waste in low-carbon cement and concrete mix designs, with a particular emphasis on recycling construction demolition wastes. Similarly, our engagements with METU and 9 Eylül University are centered around energy optimization and the development of low-carbon concrete structures. These academic partnerships are vital for enhancing our R&D capabilities and ensuring that our products and processes are at the forefront of sustainability. In addition to academic collaborations, our engagement with TÜBİTAK MARMARA RESEARCH CENTER (MAM) focuses on technical discussions regarding the integration of low-TRL carbon capture technologies into the cement sector and the evaluation of potential carbon storage sites in Turkey. By participating in national and international events and maintaining active roles in NGOs like TÜRKÇİMENTO, we stay informed about innovative technologies and developments, while also influencing sector-wide decisions on climate-related issues. Our involvement in the Pre-Assessment Support Project of the Turkish Circular Economy Platform and the Industrial Symbiosis Project with ETI Mining Company and the South Marmara Development Agency exemplifies our commitment to circular economy practices. These engagements allow us to explore alternative raw material sources, such as marble residuals and boron mineral by-products, and to evaluate their use in creating low-carbon cement and concrete products. By collaborating with these diverse stakeholders, we not only contribute to the greater good in climate action but also reinforce our position as a sector leader in sustainability and innovation.

(5.11.9.6) Effect of engagement and measures of success

Our collaborations with esteemed universities have been instrumental in developing innovative low-carbon products, which are crucial for our commitment to reducing our environmental impact. The insights gained from these partnerships have directly contributed to the optimization of our cement and concrete mixes, enhancing our sustainability profile. Working with TÜBİTAK MAM has significantly advanced our understanding and potential implementation of CCUS technologies, ensuring we are well-prepared for future emission reduction requirements. Our active role in industry events and with organizations like TÜRKÇİMENTO keeps us at the cutting edge of climate-related discussions, allowing us to shape the sector's approach to climate change. Projects like the Pre-Assessment Support Project and the Industrial Symbiosis Project have been pivotal in identifying alternative, sustainable raw materials, which supports our transition to a circular economy model and lessens our dependence on conventional resources. The success of our engagement is reflected in the seamless incorporation of these sustainable practices into our operations, the progress in our research and development efforts, and our reinforced position as a leader in environmental responsibility within the cement sector. These collaborative efforts underscore our dedication to collective climate action and the significant strides we are making towards our environmental objectives.

Water

(5.11.9.1) Type of stakeholder

Select from:

Investors and shareholders

(5.11.9.2) Type and details of engagement

Education/Information sharing

- Educate and work with stakeholders on understanding and measuring exposure to environmental risks
- Run an engagement campaign to educate stakeholders about the environmental impacts about your products, goods and/or services
- Share information about your products and relevant certification schemes
- Share information on environmental initiatives, progress and achievements

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

Engaging with stakeholders is a strategic priority for Limak Cement, as we recognize the importance of collaboration in addressing climate-related issues and advancing our sustainability goals. Our rationale for engaging with these stakeholders is rooted in the belief that collective action and knowledge-sharing are crucial for driving innovation and implementing effective climate solutions. We focus on partnerships that can directly contribute to the development of low-carbon products and the integration of advanced technologies such as Carbon Capture, Utilization, and Storage (CCUS). For instance, our collaboration with Hacettepe University's Civil Engineering Department aims to optimize the use of waste in low-carbon cement and concrete mix designs, with a particular emphasis on recycling construction demolition wastes. Similarly, our engagements with METU and 9 Eylül University are centered around energy optimization and the development of low-carbon concrete structures. These academic partnerships are vital for enhancing our R&D capabilities and ensuring that our products and processes are at the forefront of sustainability. In addition to academic collaborations, our engagement with TÜBİTAK MARMARA RESEARCH CENTER (MAM) focuses on technical discussions regarding the integration of low-TRL carbon capture technologies into the cement sector and the evaluation of potential carbon storage sites in Turkey. By participating in national and international events and maintaining active roles in NGOs like TÜRKÇİMENTO, we stay informed about innovative technologies and developments, while also influencing sector-wide decisions on climate-related issues. Our involvement in the Pre-Assessment Support Project of the Turkish Circular Economy Platform and the Industrial Symbiosis Project with ETI Mining Company and the South Marmara Development Agency exemplifies our commitment to circular economy practices. These engagements allow us to explore alternative raw material sources, such as marble residuals and boron mineral by-products, and to evaluate their use in creating low-carbon cement and concrete products. By collaborating with these diverse stakeholders, we not only contribute to the greater good in climate action but also reinforce our position as a sector leader in sustainability and innovation.

(5.11.9.6) Effect of engagement and measures of success

Our measures of success include the degree of innovation and collaborative efforts resulting from stakeholder interactions. The introduction of new water-saving related educations, seminars and the establishment of partnerships for regional water conservation projects, are tangible outcomes that signal progress. Positive stakeholder feedback, ongoing support, and recognition from the community and regulatory agencies further validate the effectiveness of our water management strategies. Ultimately, the overarching measure of success is the long-term health and sustainability of local water resources, indicating a beneficial impact on the local watershed and community. By achieving these measures of success, we demonstrate our role in reducing water-related risks and our contribution to environmental sustainability.

[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:

Operational control

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

Operational control refers to situations where the company or its subsidiaries have full management and decision-making authority over operations. This means that the company has the authority to establish and implement operational policies. As Limak Cement, we directly control our production processes and operational efficiency. Additionally, we are aware that operational control will allow us to take greater responsibility for our environmental impacts and be more transparent in our efforts to reduce these impacts. We have chosen this approach to more effectively manage our company's environmental risks and reduce potential environmental harm.

Water

(6.1.1) Consolidation approach used

Select from:

Operational control

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

Operational control refers to situations where the company or its subsidiaries have full management and decision-making authority over operations. This means that the company has the authority to establish and implement operational policies. As Limak Cement, we directly control our production processes and operational efficiency. Additionally, we are aware that operational control will allow us to take greater responsibility for our environmental impacts and be more transparent in our efforts to reduce these impacts. We have chosen this approach to more effectively manage our company's environmental risks and reduce potential environmental harm.

Plastics

(6.1.1) Consolidation approach used

Select from:

Operational control

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

Operational control refers to situations where the company or its subsidiaries have full management and decision-making authority over operations. This means that the company has the authority to establish and implement operational policies. As Limak Cement, we directly control our production processes and operational efficiency. Additionally, we are aware that operational control will allow us to take greater responsibility for our environmental impacts and be more transparent in our efforts to reduce these impacts. We have chosen this approach to more effectively manage our company's environmental risks and reduce potential environmental harm.

Biodiversity

(6.1.1) Consolidation approach used

Select from:

Operational control

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

Operational control refers to situations where the company or its subsidiaries have full management and decision-making authority over operations. This means that the company has the authority to establish and implement operational policies. As Limak Cement, we directly control our production processes and operational efficiency. Additionally, we are aware that operational control will allow us to take greater responsibility for our environmental impacts and be more transparent in our efforts to reduce these impacts. We have chosen this approach to more effectively manage our company's environmental risks and reduce potential environmental harm.

[Fixed row]

C7. Environmental performance - Climate Change

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

	Has there been a structural change?
	<i>Select all that apply</i> <input checked="" type="checkbox"/> No

[Fixed row]

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

	Change(s) in methodology, boundary, and/or reporting year definition?
	<i>Select all that apply</i> <input checked="" type="checkbox"/> No

[Fixed row]

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

(7.3.1) Scope 2, location-based

Select from:

We are reporting a Scope 2, location-based figure

(7.3.2) Scope 2, market-based

Select from:

We have no operations where we are able to access electricity supplier emission factors or residual emissions factors and are unable to report a Scope 2, market-based figure

(7.3.3) Comment

We calculate our Scope 2 Emissions as "Indirect emissions from the generation of imported electricity - based on location". First of all, we collect the electrical energy consumed every month in KWH in order to reach the activity data. Afterwards, we get the emission factors from the "Turkey Electricity Production and Electricity Consumption Point Emission Factors Information Form". We get the emission value in tons by multiplying the activity data and the emission factor. Finally, we find the CO2 equivalent by multiplying by the appropriate GWP values for CH4 and N2O.

[Fixed row]

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

Scope 1

(7.5.1) Base year end

12/31/2008

(7.5.2) Base year emissions (metric tons CO2e)

1938115.0

(7.5.3) Methodological details

Scope 1 emissions for clinker and cement production include total direct emissions primarily resulting from limestone calcination and fuel combustion.

Scope 2 (location-based)

(7.5.1) Base year end

12/31/2008

(7.5.2) Base year emissions (metric tons CO2e)

187196.0

(7.5.3) Methodological details

Scope 2 emissions consist of total indirect emissions resulting from power consumption. Our power is sourced from an interconnected grid, with the reference factor provided by the Ministry of Energy and Natural Resources (Türkiye).

Scope 2 (market-based)

(7.5.1) Base year end

12/30/2008

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

The location-based result has been used as a proxy since a market-based figure cannot be calculated

Scope 3 category 1: Purchased goods and services

(7.5.1) Base year end

12/30/2022

(7.5.2) Base year emissions (metric tons CO2e)

109458.0

(7.5.3) Methodological details

Raw materials and materials related to production are included in the calculation.

Scope 3 category 2: Capital goods

(7.5.1) Base year end

12/30/2022

(7.5.2) Base year emissions (metric tons CO₂e)

0

(7.5.3) Methodological details

Since capital goods are not included as a material category in the Cement Sector Scope 3 GHG Accounting and Reporting Guidance by the WBCSD Cement Sustainability Initiative (now GCCA), we have not assessed them.

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

(7.5.1) Base year end

12/31/2022

(7.5.2) Base year emissions (metric tons CO₂e)

398646.0

(7.5.3) Methodological details

Well-to tank of Fuels not included in Scope 1 and 2 have been calculated and added.

Scope 3 category 4: Upstream transportation and distribution

(7.5.1) Base year end

12/31/2022

(7.5.2) Base year emissions (metric tons CO2e)

92360.0

(7.5.3) Methodological details

Transportation logistics calculation was made for production and services

Scope 3 category 5: Waste generated in operations

(7.5.1) Base year end

12/31/2022

(7.5.2) Base year emissions (metric tons CO2e)

304.0

(7.5.3) Methodological details

It is declared by the Ministry of Environment, Urbanization and Climate Change according to the disposal method of waste. Waste generated in operations also included in calculations.

Scope 3 category 6: Business travel

(7.5.1) Base year end

12/31/2022

(7.5.2) Base year emissions (metric tons CO2e)

1159.0

(7.5.3) Methodological details

Although business travel is not one of the material categories outlined in the Cement Sector Scope 3 GHG Accounting and Reporting Guidance issued by the WBCSD Cement Sustainability Initiative (now GCCA), we have calculated and included emissions from flights and accommodation.

Scope 3 category 7: Employee commuting

(7.5.1) Base year end

12/31/2022

(7.5.2) Base year emissions (metric tons CO2e)

1517.0

(7.5.3) Methodological details

Although business travel is not one of the material categories outlined in the Cement Sector Scope 3 GHG Accounting and Reporting Guidance issued by the WBCSD Cement Sustainability Initiative (now GCCA), we have calculated and included emissions from employee commuting which is provided by shuttle services.

Scope 3 category 8: Upstream leased assets

(7.5.1) Base year end

12/30/2022

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Since upstream leased assets are not classified as a relevant category in the "Cement Sector Scope 3 GHG Accounting and Reporting Guidance" developed by the WBCSD Cement Sustainability Initiative (now GCCA), we have not assessed this category.

Scope 3 category 9: Downstream transportation and distribution

(7.5.1) Base year end

12/31/2022

(7.5.2) Base year emissions (metric tons CO2e)

356180.0

(7.5.3) Methodological details

It covers the emissions that occur during the process of our product reaching the end user.

Scope 3 category 10: Processing of sold products

(7.5.1) Base year end

12/30/2022

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Since processing of sold products are not classified as a relevant category in the "Cement Sector Scope 3 GHG Accounting and Reporting Guidance" developed by the WBCSD Cement Sustainability Initiative (now GCCA), we have not assessed this category.

Scope 3 category 11: Use of sold products

(7.5.1) Base year end

12/31/2022

(7.5.2) Base year emissions (metric tons CO2e)

8324.0

(7.5.3) Methodological details

It covers the emissions resulting from the processing or use of our product by the end user.

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

(7.5.1) Base year end

12/31/2022

(7.5.2) Base year emissions (metric tons CO2e)

6049.0

(7.5.3) Methodological details

The Scope 3 standard exempts producers of intermediate products, like cement, from reporting Categories 11 and 12 due to the difficulty in identifying their end use, but we have calculated them nonetheless.

Scope 3 category 13: Downstream leased assets

(7.5.1) Base year end

12/30/2022

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Since upstream leased assets are not classified as a relevant category in the "Cement Sector Scope 3 GHG Accounting and Reporting Guidance" developed by the WBCSD Cement Sustainability Initiative (now GCCA), we have not assessed this category

Scope 3 category 14: Franchises

(7.5.1) Base year end

12/30/2022

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Since franchises are not classified as a relevant category in the "Cement Sector Scope 3 GHG Accounting and Reporting Guidance" developed by the WBCSD Cement Sustainability Initiative (now GCCA), we have not assessed this category.

Scope 3 category 15: Investments

(7.5.1) Base year end

12/30/2022

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Since investments are not classified as a relevant category in the "Cement Sector Scope 3 GHG Accounting and Reporting Guidance" developed by the WBCSD Cement Sustainability Initiative (now GCCA), we have not assessed this category.

Scope 3: Other (upstream)

(7.5.1) Base year end

12/30/2022

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

No further relevant upstream emissions have been identified.

Scope 3: Other (downstream)

(7.5.1) Base year end

12/30/2022

(7.5.2) Base year emissions (metric tons CO₂e)

0

(7.5.3) Methodological details

o further relevant downstream emissions have been identified.

[Fixed row]

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

Reporting year

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

7138622

(7.6.3) Methodological details

This value refers to the scope 1 emissions of our organization in 2023. Compared to last year, Scope 1 emissions have decreased. Calculations were made within the framework of ISO 14064 standard.

[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)

342995.4

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

0

(7.7.4) Methodological details

This value refers to the scope 2 emissions of our organization in reporting year. Our Scope 2 emissions are calculated with total electricity consumption and grid emission factor, than certified by a 3rd party verifier for all our facilities. Calculations were made within the framework of ISO 14064 standard.

[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)

608071.27

(7.8.3) Emissions calculation methodology

Select all that apply

- Average data method
- Average product method
- Fuel-based method
- Distance-based 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

Raw materials and materials related to production are included in the calculation.

Capital goods

(7.8.1) Evaluation status

Select from:

- Not relevant, explanation provided

(7.8.5) Please explain

There is no clear data on the subject

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)

416255.97

(7.8.3) Emissions calculation methodology

Select all that apply

- Average data method
- Average product method
- Fuel-based method
- Distance-based 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

Well-to tank of Fuels not included in Scope 1 and 2 have been calculated and added.

Upstream transportation and distribution

(7.8.1) Evaluation status

Select from:

- Relevant, calculated

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

68774.92

(7.8.3) Emissions calculation methodology

Select all that apply

- Average data method
- Fuel-based 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

Transportation logistics calculation was made for production and services

Waste generated in operations

(7.8.1) Evaluation status

Select from:

- Relevant, calculated

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

304.56

(7.8.3) Emissions calculation methodology

Select all that apply

- Average data 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

It is declared by the Ministry of Environment, Urbanization and Climate Change according to the disposal method of waste. Waste generated in operations included in calculations.

Business travel

(7.8.1) Evaluation status

Select from:

Relevant, calculated

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

23928.47

(7.8.3) Emissions calculation methodology

Select all that apply

Average data method

Fuel-based 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

As business travel, flights and accommodation calculations are included.

Employee commuting

(7.8.1) Evaluation status

Select from:

Relevant, calculated

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

(7.8.3) Emissions calculation methodology

Select all that apply

- Average data method
- Fuel-based 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

Personnel transportation is provided by shuttle service.

Upstream leased assets

(7.8.1) Evaluation status

Select from:

- Not relevant, explanation provided

(7.8.5) Please explain

As upstream leased assets are not one of the material categories as outlined in the Cement Sector Scope 3 GHG Accounting and Reporting Guidance issued by the WBCSD Cement Sustainability Initiative (now GCCA), we have not evaluated it.

Downstream transportation and distribution

(7.8.1) Evaluation status

Select from:

- Relevant, calculated

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

63346.7

(7.8.3) Emissions calculation methodology

Select all that apply

- Average data method
- Fuel-based 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

Total transportation of the product (up-/downstream) considered under two different category

Processing of sold products

(7.8.1) Evaluation status

Select from:

- Not relevant, explanation provided

(7.8.5) Please explain

As processing of sold products are not one of the material categories as outlined in the Cement Sector Scope 3 GHG Accounting and Reporting Guidance issued by the WBCSD Cement Sustainability Initiative (now GCCA), we have not evaluated it.

Use of sold products

(7.8.1) Evaluation status

Select from:

Relevant, calculated

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

8933.84

(7.8.3) Emissions calculation methodology

Select all that apply

Average data method

Average product method

Fuel-based method

Distance-based 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

This figure is calculated based on the material that is sold to 3rd parties for further processing in concrete.

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)

7629.23

(7.8.3) Emissions calculation methodology

Select all that apply

- Average data method
- Average product method
- Fuel-based method
- Distance-based 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

As end-of-life treatment of sold products are not one of the material categories as outlined in the Cement Sector Scope 3 GHG Accounting and Reporting Guidance issued by the WBCSD Cement Sustainability Initiative (now GCCA), we have not evaluated it.

Downstream leased assets

(7.8.1) Evaluation status

Select from:

- Not relevant, explanation provided

(7.8.5) Please explain

There are no additional emissions outside the Categories of Scope 3 that have been identified

Franchises

(7.8.1) Evaluation status

Select from:

Not relevant, explanation provided

(7.8.5) Please explain

There are no additional emissions outside the Categories of Scope 3 that have been identified.

Investments

(7.8.1) Evaluation status

Select from:

Not relevant, explanation provided

(7.8.5) Please explain

There are no additional emissions outside the Categories of Scope 3 that have been identified.

Other (upstream)

(7.8.1) Evaluation status

Select from:

Not evaluated

(7.8.5) Please explain

There are no additional emissions outside the Categories of Scope 3 that have been identified.

Other (downstream)

(7.8.1) Evaluation status

Select from:

Not evaluated

(7.8.5) Please explain

There are no additional emissions outside the Categories of Scope 3 that have been identified.

[Fixed row]

(7.9) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	Select from: <input checked="" type="checkbox"/> Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	Select from: <input checked="" type="checkbox"/> Third-party verification or assurance process in place
Scope 3	Select from: <input checked="" type="checkbox"/> 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

14064-1 Verification Reports -All Plants Consolidated.pdf

(7.9.1.5) Page/section reference

This is a document that contains each factory's document one by one. Please see the 9th page of each to see the relevant reference. So, please see the 9th, 18th, 27th, 36th, 45th, 54th, 63rd pages of this consolidated document.

(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

14064-1 Verification Reports -All Plants Consolidated.pdf

(7.9.2.6) Page/ section reference

This is a document that contains each factory's document one by one. Please see the 9th page of each to see the relevant reference. So, please see the 9th, 18th, 27th, 36th, 45th, 54th, 63rd pages of this consolidated document.

(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: Use of sold products
- 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

14064-1 Verification Reports -All Plants Consolidated.pdf

(7.9.3.6) Page/section reference

This is a document that contains each factory's document one by one. Please see the 9th page of each to see the relevant reference. So, please see the 9th, 18th, 27th, 36th, 45th, 54th, 63rd pages of this consolidated document.

(7.9.3.7) Relevant standard

Select from:

ISO14064-1

(7.9.3.8) Proportion of reported emissions verified (%)

100

[Add row]

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

Change in renewable energy consumption

(7.10.1.1) Change in emissions (metric tons CO₂e)

0

(7.10.1.2) Direction of change in emissions

Select from:

No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

There was no change in renewable energy consumption during the year.

Other emissions reduction activities

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

There were no other emissions reduction activities during the year.

Divestment

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

There were no divestments during the year.

Acquisitions

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

There were no acquisitions during the year.

Mergers

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

There were no mergers during the year.

Change in output

(7.10.1.1) Change in emissions (metric tons CO₂e)

71691

(7.10.1.2) Direction of change in emissions

Select from:

Decreased

(7.10.1.3) Emissions value (percentage)

0.94

(7.10.1.4) Please explain calculation

Energy efficiency practices and the integration of new technologies in the production process led to a decrease in emissions.

Change in methodology

(7.10.1.1) Change in emissions (metric tons CO₂e)

31898

(7.10.1.2) Direction of change in emissions

Select from:

Decreased

(7.10.1.3) Emissions value (percentage)

0.41

(7.10.1.4) Please explain calculation

It represents the difference arising from the updating of the emission factor used for Scope 2.

Change in boundary

(7.10.1.1) Change in emissions (metric tons CO₂e)

0

(7.10.1.2) Direction of change in emissions

Select from:

No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

There is no change in boundary in the reporting year.

Change in physical operating conditions

(7.10.1.1) Change in emissions (metric tons CO₂e)

0

(7.10.1.2) Direction of change in emissions

Select from:

No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

There is no change in physical operating conditions in the reporting year.

Unidentified

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

There is no unidentified cause for the change in emissions.

Other

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

*There is no other cause for the change in emissions.
[Fixed row]*

(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)

7122151

(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)

6511

(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)

9773

(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)

257

(7.15.1.3) GWP Reference

Select from:

IPCC Sixth Assessment Report (AR6 - 100 year)

Row 5

(7.15.1.1) Greenhouse gas

Select from:

SF6

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

29

(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	7138622.6	342995.4	0

[Fixed row]

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

Row 1

(7.17.2.1) Facility

Sanliurfa Cement Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

1057334.6

(7.17.2.3) Latitude

37.28

(7.17.2.4) Longitude

38.73

Row 2

(7.17.2.1) Facility

Trakya Cement Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

1345687.7

(7.17.2.3) Latitude

41.63

(7.17.2.4) Longitude

27.5

Row 3

(7.17.2.1) Facility

Anka Cement Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

1194571.6

(7.17.2.3) Latitude

39.6

(7.17.2.4) Longitude

32.42

Row 4

(7.17.2.1) Facility

Ergani Cement Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

538519.5

(7.17.2.3) Latitude

38.28

(7.17.2.4) Longitude

39.74

Row 5

(7.17.2.1) Facility

Kilis Cement Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

1475349.6

(7.17.2.3) Latitude

36.8

(7.17.2.4) Longitude

37.02

Row 6

(7.17.2.1) Facility

Balikesir Cement Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

961929.1

(7.17.2.3) Latitude

39.62

(7.17.2.4) Longitude

27.88

Row 7

(7.17.2.1) Facility

Kurtalan Cement Plant

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

565230.2

(7.17.2.3) Latitude

37.96

(7.17.2.4) Longitude

41.71

[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	Cement	7138622.61

[Add row]

(7.19) Break down your organization’s total gross global Scope 1 emissions by sector production activity in metric tons CO2e.

Cement production activities

(7.19.1) Gross Scope 1 emissions, metric tons CO2e

7138622.61

(7.19.2) Net Scope 1 emissions , metric tons CO2e

4231264.25

(7.19.3) Comment

Direct Emissions per ton Cement and per ton clinker are calculated. Net emissions are gross emissions minus credits for indirect GHG savings. Credits may be awarded for the use of “alternative fuels and raw” materials (AFR). AFR come in the form of recovered wastes which displace the use of fossil fuels.

[Fixed row]

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

Row 1

(7.20.2.1) Facility

Anka Cement Plant

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

61297.5

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 2

(7.20.2.1) Facility

Trakya Cement Plant

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

64568.3

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 4

(7.20.2.1) Facility

Sanliurfa Cement Plant

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

51859.6

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 5

(7.20.2.1) Facility

Ergani Cement Plant

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

32298.1

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 7

(7.20.2.1) Facility

Kilis Cement Plant

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

63477.7

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 8

(7.20.2.1) Facility

Kurtalan Cement Plant

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

27596

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 9

(7.20.2.1) Facility

Balıkesir Cement Plant

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

41897.21

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

[Add row]

(7.20.3) Break down your total gross global Scope 2 emissions by business activity.

	Activity	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Row 1	<i>Generated from Cement Production Process</i>	<i>342995.4</i>	<i>0</i>

[Add row]

(7.21) Break down your organization’s total gross global Scope 2 emissions by sector production activity in metric tons CO2e.

	Scope 2, location-based, metric tons CO2e	Comment
Cement production activities	342995.4	<i>Our organization’s total gross global Scope 2 emissions by sector production activity in metric tons CO2e.</i>

[Fixed row]

(7.22) Break down your gross Scope 1 and Scope 2 emissions between your consolidated accounting group and other entities included in your response.

	Scope 1 emissions (metric tons CO2e)	Scope 2, location-based emissions (metric tons CO2e)	Please explain
Consolidated accounting group	0	0	<i>Our responses do not include joint ventures and unconsolidated subsidiaries.</i>
All other entities	0	0	<i>Our responses do not include joint ventures and unconsolidated subsidiaries.</i>

[Fixed row]

(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: <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired electricity	Select from: <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired heat	Select from: <input checked="" type="checkbox"/> No
Consumption of purchased or acquired steam	Select from: <input checked="" type="checkbox"/> No
Consumption of purchased or acquired cooling	Select from: <input checked="" type="checkbox"/> No
Generation of electricity, heat, steam, or cooling	Select from: <input checked="" type="checkbox"/> 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

4206695

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

4206695

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

0

(7.30.1.3) MWh from non-renewable sources

737323

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

737323

Total energy consumption

(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

4944018

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

4944018

[Fixed row]

(7.30.2) Report your organization's energy consumption totals (excluding feedstocks) for cement production activities in MWh.

	Heating value	Total MWh
Consumption of fuel (excluding feedstocks)	Select from: <input checked="" type="checkbox"/> LHV (lower heating value)	4204369
Consumption of purchased or acquired electricity	Select from: <input checked="" type="checkbox"/> LHV (lower heating value)	737323
Total energy consumption	Select from:	4941692

[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: <input checked="" type="checkbox"/> No
Consumption of fuel for the generation of heat	Select from: <input checked="" type="checkbox"/> Yes
Consumption of fuel for the generation of steam	Select from: <input checked="" type="checkbox"/> No
Consumption of fuel for the generation of cooling	Select from: <input checked="" type="checkbox"/> No
Consumption of fuel for co-generation or tri-generation	Select from: <input checked="" type="checkbox"/> 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

(7.30.7.8) Comment

Sustainable biomass is not used in our organisation.

Other biomass

(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

Other biomass is not used in our organisation.

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

(7.30.7.8) Comment

Other renewable fuels are not used in our organisation.

Coal

(7.30.7.1) Heating value

Select from:

LHV

(7.30.7.2) Total fuel MWh consumed by the organization

4194127

(7.30.7.8) Comment

It is the data obtained by multiplying the ton amount of petcoke, imported lignite and domestic lignite in the facility-specific calculations with the KWh conversion factor for each type of coal.

Oil

(7.30.7.1) Heating value

Select from:

LHV

(7.30.7.2) Total fuel MWh consumed by the organization

12313

(7.30.7.8) Comment

The total of fuel oil used for our 7 integrated plants in 2022 is taken. (Converted to mwh.)

Gas

(7.30.7.1) Heating value

Select from:

LHV

(7.30.7.2) Total fuel MWh consumed by the organization

(7.30.7.8) Comment

Our factories in general generate energy from waste heat and do not use natural gas.

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

Other non-renewable fuels are not used in our organisation.

Total fuel**(7.30.7.1) Heating value**

Select from:

LHV

(7.30.7.2) Total fuel MWh consumed by the organization

4206695

(7.30.7.8) Comment

*Total Fuel
[Fixed row]*

(7.30.8) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel for cement production activities.

Sustainable biomass

(7.30.8.1) Heating value

Select from:

LHV

(7.30.8.2) Total MWh fuel consumed for cement production activities

0

(7.30.8.3) MWh fuel consumed at the kiln

0

(7.30.8.4) MWh fuel consumed for the generation of heat that is not used in the kiln

0

(7.30.8.7) Comment

Sustainable biomass is not used in our organisation.

Other biomass

(7.30.8.1) Heating value

Select from:

LHV

(7.30.8.2) Total MWh fuel consumed for cement production activities

0

(7.30.8.3) MWh fuel consumed at the kiln

0

(7.30.8.4) MWh fuel consumed for the generation of heat that is not used in the kiln

0

(7.30.8.7) Comment

Other biomass is not used in our organisation.

Other renewable fuels (e.g. renewable hydrogen)

(7.30.8.1) Heating value

Select from:

LHV

(7.30.8.2) Total MWh fuel consumed for cement production activities

0

(7.30.8.3) MWh fuel consumed at the kiln

0

(7.30.8.4) MWh fuel consumed for the generation of heat that is not used in the kiln

0

(7.30.8.7) Comment

Other renewable fuels are not used in our organisation.

Coal

(7.30.8.1) Heating value

Select from:

LHV

(7.30.8.2) Total MWh fuel consumed for cement production activities

4194127

(7.30.8.3) MWh fuel consumed at the kiln

4194127

(7.30.8.4) MWh fuel consumed for the generation of heat that is not used in the kiln

0

(7.30.8.7) Comment

It is the data obtained by multiplying the ton amount of petcoke, imported lignite and domestic lignite in the facility-specific calculations with the KWh conversion factor for each type of coal.

Oil

(7.30.8.1) Heating value

Select from:

LHV

(7.30.8.2) Total MWh fuel consumed for cement production activities

10242

(7.30.8.3) MWh fuel consumed at the kiln

10242

(7.30.8.4) MWh fuel consumed for the generation of heat that is not used in the kiln

0

(7.30.8.7) Comment

The total of fuel oil used for our 7 integrated plants in 2022 is taken. (Converted to mwh.)

Gas

(7.30.8.1) Heating value

Select from:

LHV

(7.30.8.2) Total MWh fuel consumed for cement production activities

0

(7.30.8.3) MWh fuel consumed at the kiln

0

(7.30.8.4) MWh fuel consumed for the generation of heat that is not used in the kiln

0

(7.30.8.7) Comment

Our factories in general generate energy from waste heat and do not use natural gas.

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

(7.30.8.1) Heating value

Select from:

LHV

(7.30.8.2) Total MWh fuel consumed for cement production activities

0

(7.30.8.3) MWh fuel consumed at the kiln

0

(7.30.8.4) MWh fuel consumed for the generation of heat that is not used in the kiln

0

(7.30.8.7) Comment

Other non-renewable fuels are not used in our organisation.

Total fuel

(7.30.8.1) Heating value

Select from:

LHV

(7.30.8.2) Total MWh fuel consumed for cement production activities

4204369

(7.30.8.3) MWh fuel consumed at the kiln

4204369

(7.30.8.4) MWh fuel consumed for the generation of heat that is not used in the kiln

0

(7.30.8.7) Comment

*Total Fuel
[Fixed 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)

737323

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

0

(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)

*737323.00
[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

0.000506

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

7481618

(7.45.3) Metric denominator

Select from:

unit total revenue

(7.45.4) Metric denominator: Unit total

14781940252

(7.45.5) Scope 2 figure used

Select from:

Location-based

(7.45.6) % change from previous year

0.39

(7.45.7) Direction of change

Select from:

Decreased

(7.45.8) Reasons for change

Select all that apply

- Other emissions reduction activities
- Change in output
- Change in revenue
- Other, please specify :New invesments

(7.45.9) Please explain

The decrease in metric tons CO2e per unit currency total revenue this year is a direct result of continued investments in energy efficiency and the implementation of new technologies. The adoption of advanced equipment has led to reduced emissions, lower energy consumption, and minimized maintenance costs through intermittent operation capabilities. Furthermore, the introduction of alternative fuel systems has enabled lower carbon emissions. Energy efficiency improvements in motor systems, including the completion of compensation system applications in low voltage direct start motors, have contributed to significant energy savings. These combined efforts have directly reduced our carbon footprint.

[Add row]

(7.47) State your organization's Scope 1 and Scope 2 emissions intensities related to cement production activities.

	Gross Scope 1 emissions intensity, metric tons CO2e per metric ton	Net Scope 1 emissions intensity, metric tons CO2e per metric ton	Scope 2, location-based emissions intensity, metric tons CO2e per metric ton
Clinker	0.845	0.525	0.844
Cement equivalent	0.719	0.515	0.828
Cementitious products	0	0	0
Low-CO2 materials	0	0	0

[Fixed row]

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

Row 1

(7.52.1) Description

Select from:

Waste

(7.52.2) Metric value

352761

(7.52.3) Metric numerator

tonnes ARM/year

(7.52.4) Metric denominator (intensity metric only)

21,21 ton CO₂ / ton ARM (Scope 12 / ton ARM)

(7.52.5) % change from previous year

23

(7.52.6) Direction of change

Select from:

Increased

(7.52.7) Please explain

The amount of Alternative Raw Materials (ARM) increased from 287.961 tons last year to 352.761 tons this year. This increase, coupled with a reduction of 103,589.99 tons of CO₂e in Scope 1 and Scope 2 emissions, has led to an improvement in emissions intensity, reflecting our ongoing commitment to reducing our carbon footprint while optimizing resource use

Row 2

(7.52.1) Description

Select from:

Energy usage

(7.52.2) Metric value

128358

(7.52.3) Metric numerator

tonnes RDF /year

(7.52.4) Metric denominator (intensity metric only)

59,29 ton CO2 / ton ARM (Scope 12 / ton ARM)

(7.52.5) % change from previous year

240

(7.52.6) Direction of change

Select from:

Increased

(7.52.7) Please explain

The amount of Alternative Fuel (AF) increased from 37.797 tons last year to 128.358 tons this year. This increase, coupled with a reduction of CO2e in Scope 1 and Scope 2 emissions, has led to an improvement in emissions intensity, reflecting our ongoing commitment to reducing our carbon footprint while optimizing resource use

[Add row]

(7.53.2) Provide details of your emissions intensity targets and progress made against those targets.

Row 1

(7.53.2.1) Target reference number

Select from:

Int 1

(7.53.2.2) Is this a science-based target?

Select from:

Yes, we consider this a science-based target, but we have not committed to seek validation of this target by the Science Based Targets initiative within the next two years

(7.53.2.4) Target ambition

Select from:

1.5°C aligned

(7.53.2.5) Date target was set

12/30/2023

(7.53.2.6) Target coverage

Select from:

Business activity

(7.53.2.7) Greenhouse gases covered by target

Select all that apply

Carbon dioxide (CO2)

(7.53.2.8) Scopes

Select all that apply

Scope 1

(7.53.2.11) Intensity metric

Select from:

Metric tons CO2e per metric ton of cement

(7.53.2.12) End date of base year

12/30/2021

(7.53.2.13) Intensity figure in base year for Scope 1 (metric tons CO2e per unit of activity)

716

(7.53.2.33) Intensity figure in base year for all selected Scopes (metric tons CO2e per unit of activity)

716.0000000000

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

0

(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 (%)

23.2

(7.53.2.57) Intensity figure at end date of target for all selected Scopes (metric tons CO2e per unit of activity)

549.8880000000

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

-39.6

(7.53.2.60) Intensity figure in reporting year for Scope 1 (metric tons CO2e per unit of activity)

719

(7.53.2.80) Intensity figure in reporting year for all selected Scopes (metric tons CO2e per unit of activity)

719.0000000000

(7.53.2.81) Land-related emissions covered by target

Select from:

No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.2.82) % of target achieved relative to base year

-1.81

(7.53.2.83) Target status in reporting year

Select from:

Underway

(7.53.2.85) Explain target coverage and identify any exclusions

As Limak Cement, we aim to reduce our Scope 1 emissions by 23.2% by 2030, compared to the 2021 baseline. This target covers all our production plants and facilities, with no exclusions. To achieve this, we focus on reducing clinker usage and increasing the use of alternative fuels. Our CEM Plus product, produced at our Balıkesir, Ankara, and Kilis plants, plays a significant role in reducing Scope 1 emissions by lowering clinker content

(7.53.2.86) Target objective

Our goal is to reduce our Scope 1 emissions by 23.2% by 2030 through optimizing cement production processes. This includes increasing the production of low-clinker cement products, enhancing fuel efficiency, and exploring carbon capture technologies

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

Led by our CEO, the "Decarbonisation Committee" was established to develop policies aimed at reducing Scope 1 emissions. In line with the Paris Climate Agreement and the European Green Deal, the committee has implemented strategies such as clinker reduction in cement products and fuel optimization projects. Since 2021, our Balıkesir and Ankara plants have achieved a 5% reduction in clinker usage

(7.53.2.88) Target derived using a sectoral decarbonization approach

Select from:

No

Row 2

(7.53.2.1) Target reference number

Select from:

Int 2

(7.53.2.2) Is this a science-based target?

Select from:

Yes, we consider this a science-based target, but we have not committed to seek validation of this target by the Science Based Targets initiative within the next two years

(7.53.2.4) Target ambition

Select from:

1.5°C aligned

(7.53.2.5) Date target was set

12/30/2023

(7.53.2.6) Target coverage

Select from:

Business activity

(7.53.2.7) Greenhouse gases covered by target

Select all that apply

Carbon dioxide (CO2)

(7.53.2.8) Scopes

Select all that apply

Scope 2

(7.53.2.9) Scope 2 accounting method

Select from:

Location-based

(7.53.2.11) Intensity metric

Select from:

Metric tons CO2e per metric ton of cement

(7.53.2.12) End date of base year

12/30/2021

(7.53.2.14) Intensity figure in base year for Scope 2 (metric tons CO2e per unit of activity)

50

(7.53.2.33) Intensity figure in base year for all selected Scopes (metric tons CO2e per unit of activity)

50.0000000000

(7.53.2.35) % of total base year emissions in Scope 2 covered by this Scope 2 intensity figure

100.0

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

100.0

(7.53.2.55) End date of target

12/30/2030

(7.53.2.56) Targeted reduction from base year (%)

64

(7.53.2.57) Intensity figure at end date of target for all selected Scopes (metric tons CO2e per unit of activity)

18.0000000000

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

-39.6

(7.53.2.61) Intensity figure in reporting year for Scope 2 (metric tons CO2e per unit of activity)

46

(7.53.2.80) Intensity figure in reporting year for all selected Scopes (metric tons CO2e per unit of activity)

46.0000000000

(7.53.2.81) Land-related emissions covered by target

Select from:

No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.2.82) % of target achieved relative to base year

12.50

(7.53.2.83) Target status in reporting year

Select from:

Underway

(7.53.2.85) Explain target coverage and identify any exclusions

Our goal is to reduce Scope 2 emissions by 64% by 2030, using 2021 as the baseline. This target covers all electricity consumption across our production facilities with no exclusions. To achieve this, we are increasing investments in renewable energy and energy efficiency projects to reduce emissions from electricity consumption.

(7.53.2.86) Target objective

The objective is to reduce our Scope 2 emissions by 64% compared to 2021 levels by investing in renewable energy projects and improving energy efficiency across all operations.

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

Limak Cement has undertaken significant projects to reduce Scope 2 emissions. Solar Power Plant (SPP) projects with a total capacity of 34.75 MW will be operated at our Kurtalan, Şanlıurfa, and Derik facilities, resulting in an annual reduction of 32,456 tons of CO₂. Additionally, a 6 MW Waste Heat Recovery (WHR) project at our Trakya plant is under development, expected to reduce CO₂ emissions by 6,089 tons annually. Energy efficiency improvements in asynchronous motors have also been completed in 2021.

(7.53.2.88) Target derived using a sectoral decarbonization approach

Select from:

No

Row 3

(7.53.2.1) Target reference number

Select from:

Int 3

(7.53.2.2) Is this a science-based target?

Select from:

Yes, we consider this a science-based target, but we have not committed to seek validation of this target by the Science Based Targets initiative within the next two years

(7.53.2.4) Target ambition

Select from:

2°C aligned

(7.53.2.5) Date target was set

12/30/2023

(7.53.2.6) Target coverage

Select from:

Business activity

(7.53.2.7) Greenhouse gases covered by target

Select all that apply

Carbon dioxide (CO2)

(7.53.2.8) Scopes

Select all that apply

Scope 3

(7.53.2.10) Scope 3 categories

Select all that apply

- Category 6: Business travel
- Category 7: Employee commuting
- Category 11: Use of sold products
- Category 1: Purchased goods and services
- Category 5: Waste generated in operations
- Category 12: End-of-life treatment of sold products
- Category 4: Upstream transportation and distribution
- Category 9: Downstream transportation and distribution
- Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2)

(7.53.2.11) Intensity metric

Select from:

- Metric tons CO2e per metric ton of cement

(7.53.2.12) End date of base year

12/30/2022

(7.53.2.15) Intensity figure in base year for Scope 3, Category 1: Purchased goods and services (metric tons CO2e per unit of activity)

0

(7.53.2.17) Intensity figure in base year for Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e per unit of activity)

398646

(7.53.2.18) Intensity figure in base year for Scope 3, Category 4: Upstream transportation and distribution (metric tons CO2e per unit of activity)

92360

(7.53.2.19) Intensity figure in base year for Scope 3, Category 5: Waste generated in operations (metric tons CO2e per unit of activity)

304

(7.53.2.20) Intensity figure in base year for Scope 3, Category 6: Business travel (metric tons CO2e per unit of activity)

1159

(7.53.2.21) Intensity figure in base year for Scope 3, Category 7: Employee commuting (metric tons CO2e per unit of activity)

1517

(7.53.2.23) Intensity figure in base year for Scope 3, Category 9: Downstream transportation and distribution (metric tons CO2e per unit of activity)

356180

(7.53.2.25) Intensity figure in base year for Scope 3, Category 11: Use of sold products (metric tons CO2e per unit of activity)

8324

(7.53.2.26) Intensity figure in base year for Scope 3, Category 12: End-of-life treatment of sold products (metric tons CO2e per unit of activity)

6049

(7.53.2.32) Intensity figure in base year for total Scope 3 (metric tons CO2e per unit of activity)

864539.0000000000

(7.53.2.33) Intensity figure in base year for all selected Scopes (metric tons CO2e per unit of activity)

(7.53.2.36) % of total base year emissions in Scope 3, Category 1: Purchased goods and services covered by this Scope 3, Category 1: Purchased goods and services intensity figure

11

(7.53.2.38) % of total base year emissions in Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) covered by this Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) intensity figure

41

(7.53.2.39) % of total base year emissions in Scope 3, Category 4: Upstream transportation and distribution covered by this Scope 3, Category 4: Upstream transportation and distribution intensity figure

10

(7.53.2.40) % of total base year emissions in Scope 3, Category 5: Waste generated in operations covered by this Scope 3, Category 5: Waste generated in operations intensity figure

0.03

(7.53.2.41) % of total base year emissions in Scope 3, Category 6: Business travel covered by this Scope 3, Category 6: Business travel intensity figure

0.12

(7.53.2.42) % of total base year emissions in Scope 3, Category 7: Employee commuting covered by this Scope 3, Category 7: Employee commuting intensity figure

36

(7.53.2.44) % of total base year emissions in Scope 3, Category 9: Downstream transportation and distribution covered by this Scope 3, Category 9: Downstream transportation and distribution intensity figure

0.85

(7.53.2.46) % of total base year emissions in Scope 3, Category 11: Use of sold products covered by this Scope 3, Category 11: Use of sold products intensity figure

0.62

(7.53.2.47) % of total base year emissions in Scope 3, Category 12: End-of-life treatment of sold products covered by this Scope 3, Category 12: End-of-life treatment of sold products intensity figure

0

(7.53.2.53) % of total base year emissions in Scope 3 (in all Scope 3 categories) covered by this total Scope 3 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 (%)

40

(7.53.2.57) Intensity figure at end date of target for all selected Scopes (metric tons CO2e per unit of activity)

518723.4000000000

(7.53.2.59) % change anticipated in absolute Scope 3 emissions

-30

(7.53.2.62) Intensity figure in reporting year for Scope 3, Category 1: Purchased goods and services (metric tons CO2e per unit of activity)

608.071

(7.53.2.64) Intensity figure in reporting year for Scope 3, Category 3: Fuel- and energy-related activities (metric tons CO2e per unit of activity)

416.255

(7.53.2.65) Intensity figure in reporting year for Scope 3, Category 4: Upstream transportation and distribution (metric tons CO2e per unit of activity)

68.774

(7.53.2.66) Intensity figure in reporting year for Scope 3, Category 5: Waste generated in operations (metric tons CO2e per unit of activity)

304

(7.53.2.67) Intensity figure in reporting year for Scope 3, Category 6: Business travel (metric tons CO2e per unit of activity)

23928.47

(7.53.2.68) Intensity figure in reporting year for Scope 3, Category 7: Employee commuting (metric tons CO2e per unit of activity)

2021

(7.53.2.70) Intensity figure in reporting year for Scope 3, Category 9: Downstream transportation and distribution (metric tons CO2e per unit of activity)

63346

(7.53.2.72) Intensity figure in reporting year for Scope 3, Category 11: Use of sold products (metric tons CO2e per unit of activity)

8933

(7.53.2.73) Intensity figure in reporting year for Scope 3, Category 12: End-of-life treatment of sold products (metric tons CO2e per unit of activity)

7629

(7.53.2.79) Intensity figure in reporting year for total Scope 3 (metric tons CO2e per unit of activity)

107254.5700000000

(7.53.2.80) Intensity figure in reporting year for all selected Scopes (metric tons CO2e per unit of activity)

107254.5700000000

(7.53.2.81) Land-related emissions covered by target

Select from:

No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.2.82) % of target achieved relative to base year

218.99

(7.53.2.83) Target status in reporting year

Select from:

Underway

(7.53.2.85) Explain target coverage and identify any exclusions

We aim to reduce Scope 3 emissions related to purchased clinker and cement by 40% per ton by 2030, using 2022 as the baseline year. This target is specifically focused on the emissions from purchased clinker and cement, excluding other Scope 3 emissions such as transportation, energy use in operations, or emissions from other raw materials

(7.53.2.86) Target objective

The objective is to reduce Scope 3 emissions from purchased clinker and cement by 40% per ton by 2030, primarily through initiatives such as using clinker substitutes, sourcing lower-carbon cement, and collaborating with suppliers to promote low-carbon production processes for the materials we purchase. Primarily by optimizing our supply chain processes and working with our suppliers to implement more sustainable logistics solutions and reduce the carbon footprint of raw material transportation. In addition to the purchased clinker and cement, we could also consider reducing Scope 3 emissions from logistics and raw material transportation. For example, emissions reductions from optimized transportation processes or the use of alternative fuels could contribute to a broader reduction strategy.

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

To achieve this reduction, we are implementing a range of measures, including increasing the use of alternative raw materials and clinker substitutes in the production of purchased cement, and partnering with suppliers to adopt sustainable production techniques. These initiatives have already begun to take effect, and we are monitoring progress closely to ensure the 40% reduction is met by 2030

(7.53.2.88) Target derived using a sectoral decarbonization approach

Select from:

No

[Add row]

(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

12/30/2020

(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

12/30/2021

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

0

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

0

(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

54

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

0

(7.54.1.13) % of target achieved relative to base year

0.00

(7.54.1.14) Target status in reporting year

Select from:

Underway

(7.54.1.16) Is this target part of an emissions target?

Yes, this target is part of Limak Cement Group's broader emissions reduction target. The investment in the Alternative Fuel (AF) Feeding system and the increased use of alternative fuels at our Anka factory, as well as in other facilities, directly contributes to reducing greenhouse gas (GHG) emissions from fuel consumption. By replacing traditional fossil fuels with alternative fuels such as Refuse-Derived Fuel (RDF) and biomass-based fuels, we are significantly lowering fuel-related CO2 emissions.

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

Select all that apply

No, it's not part of an overarching initiative

(7.54.1.19) Explain target coverage and identify any exclusions

The target covers emission reductions at our Anka, Balıkesir, Trakya plants and gradually expands to other facilities including Kilis, Şanlıurfa and Ergani through investments in the AF Feed system. The scope includes all activities related to the use of alternative fuels such as RDF, tire waste and industrial waste derived fuels. There are no exceptions to this target as it covers all relevant facilities in Limak Cement Group where alternative fuel systems are implemented

(7.54.1.20) Target objective

The primary objective is to reduce fuel-related CO2 emissions by increasing the use of alternative fuels at our production plants. This aligns with Limak Cement's Net Zero Carbon target by promoting the use of low-carbon and biomass-based fuels. Additionally, the target contributes to the circular economy by utilizing waste materials that would otherwise contribute to landfill or other forms of environmental degradation.

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

The strategy to achieve this goal includes investments in AF Feed systems at multiple facilities, with investments completed at the Anka plant and planned installations in Trakya and Balıkesir. Progress to date includes significant increases in alternative fuel use, helping to prevent the consumption of tons of imported lignite in 2023 compared to 2022. We aim to achieve our emission reduction targets by continuously expanding our alternative fuel capacity

Row 2

(7.54.1.1) Target reference number

Select from:

Low 1

(7.54.1.2) Date target was set

12/30/2020

(7.54.1.3) Target coverage

Select from:

Business activity

(7.54.1.4) Target type: energy carrier

Select from:

Other, please specify :Alternative Fuel

(7.54.1.5) Target type: activity

Select from:

Consumption

(7.54.1.6) Target type: energy source

Select from:

Low-carbon energy source(s)

(7.54.1.7) End date of base year

12/30/2021

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

4152

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

0.0

(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

100

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

0

(7.54.1.13) % of target achieved relative to base year

0.00

(7.54.1.14) Target status in reporting year

Select from:

Achieved

(7.54.1.16) Is this target part of an emissions target?

Yes, process criteria are followed in the target table.

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

Select all that apply

No, it's not part of an overarching initiative

(7.54.1.19) Explain target coverage and identify any exclusions

As Limak Cement Group, we completed our AF Feeding system investment in 2022 in order to reduce our GHG emissions and contribute to the circular economy, and in order to reduce fuel-related CO2 emissions in line with our Net zero carbon target for our Anka factory. After the necessary measurement and permit processes within the scope of legal regulations, fuels derived from domestic waste with low carbon emission and high biomass content, tire wastes and fuels derived from industrial waste have started to be used as alternative fuels. (RDF usage in 2022 for our Anka factory is 8071,67 tons) Within the scope of industrial symbiosis studies, wastes with high mineral content originating from different sectors are used as alternative raw materials. Compared to 2021, the use of alternative raw materials has increased by 34%. The rate of ARM usage in the raw mill in our Trakya factory has been increased by 97% compared to the previous year. (64,003 tons/age). Similarly, Alternative Fuel Use was increased by 46% compared to the previous year. (20,452 tons/dry). With the use of Alternative Fuel, 10,305.75 tons of imported lignite consumption in 2021 and 12,961.74 tons of imported lignite in 2022 was prevented. Second tire shredder investments in our Trakya factory will be commissioned in 2023. In 2023, our investments in Alternative Fuel Feeding system will be realized in our Kilis and Balıkesir plants. In the works carried out on behalf of Limak Cement and in cement production stages, in accordance with the current regulations on secondary fuels and alternative raw materials, in order to save natural resources and energy and to make a profit for the facility, to conduct waste market research and analysis, and to provide healthier negotiations with supplier companies. fuels and alternative raw materials unit was established. Also, the current fuel sources are decreasing day by day and it will cause a competitive environment in future so alternative raw material source could provide great opportunity in long term.

(7.54.1.20) Target objective

As Limak Cement Group, we completed our AF Feeding system investment in 2022 in order to reduce our GHG emissions and contribute to the circular economy, and in order to reduce fuel-related CO2 emissions in line with our Net zero carbon target for our Anka factory. After the necessary measurement and permit processes within the scope of legal regulations, fuels derived from domestic waste with low carbon emission and high biomass content, tire wastes and fuels derived from industrial waste have started to be used as alternative fuels. (RDF usage in 2022 for our Anka factory is 8071,67 tons) Within the scope of industrial symbiosis studies, wastes with high mineral content. We are going to plan RDF usage all factories up to 2030

(7.54.1.22) List the actions which contributed most to achieving this target

We are going to plan RDF usage all factories up to 2030

[Add row]

(7.54.2) Provide details of any other climate-related targets, including methane reduction targets.

Row 1

(7.54.2.1) Target reference number

Select from:

Oth 1

(7.54.2.2) Date target was set

12/30/2023

(7.54.2.3) Target coverage

Select from:

Product level

(7.54.2.4) Target type: absolute or intensity

Select from:

Absolute

(7.54.2.5) Target type: category & Metric (target numerator if reporting an intensity target)

Renewable fuel consumption

Percentage of total fuel consumption that is from renewable sources

(7.54.2.7) End date of base year

12/30/2021

(7.54.2.8) Figure or percentage in base year

0.78

(7.54.2.9) End date of target

12/30/2030

(7.54.2.10) Figure or percentage at end of date of target

60.77

(7.54.2.11) Figure or percentage in reporting year

7.56

(7.54.2.12) % of target achieved relative to base year

11.3018836473

(7.54.2.13) Target status in reporting year

Select from:

Underway

(7.54.2.15) Is this target part of an emissions target?

The target we have set is the emissions reduction target. As 2021 was chosen as the base year, we have partially implemented renewable energy projects, so the percentage of the target achieved is 0. As part of our 2030 targets, we aim to increase our renewable energy production by 54%.

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

Select all that apply

No, it's not part of an overarching initiative

(7.54.2.18) Please explain target coverage and identify any exclusions

This target covers all our cement production facilities where renewable energy projects will be implemented, particularly focusing on solar power installations. The scope includes 13 solar power projects across different facilities, which aim to reduce overall electricity consumption from non-renewable sources. There are no exclusions; all relevant plants with the potential for renewable energy production are included in the target, and the reductions apply to Scope 2 emissions

(7.54.2.19) Target objective

The objective of this target is to reduce Scope 2 emissions by increasing the share of renewable energy in our total electricity consumption. By implementing 13 solar power projects, we aim to achieve a 54% increase in renewable energy production by 2030, with the goal of reducing CO2 emissions by 96,959 tons. This is in line with our broader sustainability strategy to transition to low-carbon energy sources and contribute to achieving our Net Zero Carbon goal

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

The plan includes the commissioning of 13 solar power plants (SPPs) across our cement production facilities, with construction phases staggered to meet our 2030 targets. While these projects have not been fully implemented as of 2021 (the base year), they are scheduled for completion over the next few years. As of the reporting year, we have completed the feasibility studies for all 13 solar power projects and initiated the procurement of the necessary equipment. No emissions reduction from renewable energy was achieved in the base year, but once the projects are operational, we expect a significant reduction of 96,959 tons of CO2 annually

[Add row]

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

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e (only for rows marked *)
Under investigation	0	`Numeric input
To be implemented	32	1343032
Implementation commenced	3	545344
Implemented	3	150312
Not to be implemented	0	`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

Waste reduction and material circularity

Product/component/material reuse

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

1868010

(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

(7.55.2.5) Annual monetary savings (unit currency – as specified in C0.4)

200000000

(7.55.2.6) Investment required (unit currency – as specified in C0.4)

2275000000

(7.55.2.7) Payback period

Select from:

4-10 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:

>30 years

(7.55.2.9) Comment

Investments completed in 2023 and alternative raw material and alternative fuel investments that will continue in 2023 and continue until 2028 have been calculated.

Row 2

(7.55.2.1) Initiative category & Initiative type

Low-carbon energy consumption

Solar PV

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

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

Select all that apply

- Scope 2 (location-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

- Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in C0.4)

250000000

(7.55.2.6) Investment required (unit currency – as specified in C0.4)

525000000

(7.55.2.7) Payback period

Select from:

- 4-10 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:

- 21-30 years

(7.55.2.9) Comment

As of 2024, 14 solar energy investments planned until 2030 have been included in the calculations.

[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 energy efficiency

(7.55.3.2) Comment

The feasibility studies of the SPP project with a total installed power of 66.2 MW for our Kurtalan, Şanlıurfa, Derik and Ergani power plants have been completed. In the same term, fuel derived from waste started to be used in our Anka factory. The pre-feasibility studies of the 6MW WHR project in our Trakya factory have been completed. In this way, it is aimed to reduce carbon emissions. The annual CO2 gain obtained from the Solar Power Plant projects in our Kurtalan, Şanlıurfa, Derik and Ergani facilities has been calculated as approximately 62.343 tons CO2/year. The annual CO2 gain of the 6MW WHR project designed in our Limak Trakya factory has been calculated as 5,604 tons of CO2. Balıkesir factory RDF feeding system and calciner waste oil system, We have many more decarbonization projects going on such as; Kilis factory fly ash stocks and RDF feeding system, our Trakya factory tire crushing machine (Shredder), waste oil system feeding modification, RDF feeding system investment, SPP projects, WHR, coal transfer blower improvements, technological pool showering pumps improvement, technological pool tower pumps improvement etc. WHR project contributes to the production of clean energy within the plant instead of energy purchased by the enterprise and further contributes to reducing the energy produced by fossil fuels outsourced and generated in power plants in the same amount. The carbon reduction of WHR with an installed capacity of 4.5 MW was calculated using the CO2 saving factor of the unit electricity in clean energy production as opposed to the fossil energy determined by UK Department of Environment Food and Rural Affairs (DEFRA). Accordingly, the annual carbon reduction contribution (YKAK) of the enterprise is calculated as 19.316, 88 t CO2 / y. It is assumed that 1 tree absorbs 12 kg of CO2 per year, and accordingly, CO2 savings achieved by 4.5 MW of WHR per year is equivalent to CO2 absorption of approximately 1.6 million trees. The amount of CO2 savings achieved reinforces steps towards greenhouse gas emission reduction and management of climate change risks.

Row 2

(7.55.3.1) Method

Select from:

- Dedicated budget for other emissions reduction activities

(7.55.3.2) Comment

In 2018, an Alternative Fuel Supply System was put into operation at the Trakya plant, reducing fossil fuel use in clinker production, thus restoring industrial-derived waste. In addition, the decrease in foreign exchange output due to fuel imports was recorded. In 2023, Limak Cement will continue to increase the amount of alternative fuel use by accelerating investments in alternative fuel systems (reducing fossil fuel use). As Limak Cement Group, we completed our AF Feeding system investment in 2022 in order to reduce our GHG emissions and contribute to the circular economy, and in order to reduce fuel-related CO2 emissions in line with our Net zero carbon target for our Anka factory. After the necessary measurement and permit processes within the scope of legal regulations, fuels derived from domestic waste with low carbon emission and high biomass content, tire wastes and fuels derived from industrial waste have started to be used as alternative fuels. (RDF usage in 2022 for our Anka factory is 8071,67 tons) Within the scope of industrial symbiosis studies, wastes with high mineral content originating from different sectors are used as alternative raw materials. Compared to 2021, the use of alternative raw materials has increased by 34%. The rate of ARM usage in the raw mill in our Trakya factory has been increased by 97% compared to the previous year. (64,003 tons/age). Similarly, Alternative Fuel Use was increased by 46% compared to the previous year. (20,452 tons/dry). With the use of Alternative Fuel, 10,305.75 tons of imported lignite consumption in 2021 and 12,961.74 tons of imported lignite in 2022 was prevented. Second tire shredder investments in our Trakya factory will be commissioned in 2023. Also, in 2023, our investments in Alternative Fuel Feeding system will be realized in our Kilis and Balıkesir plants. In the works carried out on behalf of Limak Cement and in cement production stages, in accordance with the current regulations on secondary fuels and ARM, in order to save natural resources and energy and to make a profit for the facility, to conduct waste market research and analysis, and to provide healthier negotiations with supplier companies. fuels and ARM unit was established. In order to protect natural resources, the use of waste which may be an ARM in clinker production continues effectively in all factories.

Row 3

(7.55.3.1) Method

Select from:

Dedicated budget for low-carbon product R&D

(7.55.3.2) Comment

The major carbon emission occurs during the clinker production phase so carbon emission reduction could be achieved with the developments in blended cement production. Studies are conducted to evaluate the usability of fly ash, bottom ash and synthetic gypsum from thermal power plants in both cement and concrete production. For some of our R&D projects related with blended cement production by using wastes of other energy-intensive industries, we made collaboration with Hacettepe University. The studies carried out in this concept have generally focused on the evaluation of the waste materials of mining sector (mine tailings) in cement and concrete production. Towards a circular economy, mine tailings have the potential to be transformed from a significant environmental burden into valuable resources through the recovery, reprocessing and reuse in a variety of applications. The biggest carbon emission occurs at the clinker production stage, therefore, carbon emission reduction can be achieved with improvements in the clinker production process. Studies are carried out to evaluate the usability of fly ash, bottom ash and synthetic gypsum obtained from thermal power plants by cement manufacturers with an effective quality management process in R&D activities. Two products of Limak Cement, which enables bottom ash to be used as an additive in cement, were certified with the European Evaluation Documentation (ETA) in 2019 by the European Technical Assessment Agency (EOTA), a first in our country and in the member states of the European Union.

Row 4

(7.55.3.1) Method

Select from:

- Dedicated budget for energy efficiency

(7.55.3.2) Comment

The feasibility studies of the SPP project with a total installed power of 34.75 MW for our Kurtalan, Şanlıurfa, Derik and Ergani power plants have been completed. Waste feeding system in our Anka factory and tire shredder investments in our Trakya factory were made and they were put into use in the last quarter of 2022. In the same term, fuel derived from waste started to be used in our Anka factory. The pre-feasibility studies of the 6MW WHR project in our Trakya factory have been completed. In this way, it is aimed to reduce carbon emissions. The annual CO2 gain obtained from the Solar Power Plant projects in our Kurtalan, Şanlıurfa, Derik and Ergani facilities has been calculated as approximately 32,456 tons CO2/year. The annual CO2 gain of the 6MW WHR project designed in our Limak Trakya factory has been calculated as 5,604 tons of CO2. Balıkesir factory RDF feeding system and calciner waste oil system, We have many more decarbonization projects going on such as; Kilis factory fly ash stocks and RDF feeding system, our Trakya factory tire crushing machine (Shredder), waste oil system feeding modification, RDF feeding system investment, SPP projects, WHR, coal transfer blower improvements, technological pool showering pumps improvement, technological pool tower pumps improvement etc. WHR project contributes to the production of clean energy within the plant instead of energy purchased by the enterprise and further contributes to reducing the energy produced by fossil fuels outsourced and generated in power plants in the same amount. The carbon reduction of WHR with an installed capacity of 4.5 MW was calculated using the CO2 saving factor of the unit electricity in clean energy production as opposed to the fossil energy determined by UK Department of Environment Food and Rural Affairs (DEFRA). Accordingly, the annual carbon reduction contribution (YKAK) of the enterprise is calculated as 19.316, 88 t CO2 / y. It is assumed that 1 tree absorbs 12 kg of CO2 per year, and accordingly, CO2 savings achieved by 4.5 MW of WHR per year is equivalent to CO2 absorption of approximately 1.6 million trees. The amount of CO2 savings achieved reinforces steps towards greenhouse gas emission reduction and management of climate change risks.

[Add row]

(7.64) Disclose your organization's best available techniques as a percentage of Portland cement clinker production capacity.

	Total production capacity coverage (%)
4+ cyclone preheating	85
Pre-calciner	38

[Fixed row]

(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:

Other, please specify :Turkish Patent Institute

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

Other

Other, please specify :A type of cement (CEM PLUS+)

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

According to the Green Cement Regulation, green cements are those that fall under the TS EN 197-1 standard, excluding CEM I-Portland cement, and contain less than 95% clinker and more than 5% mineral additives such as limestone, silica fume, fly ash, pozzolana, and similar materials. By increasing the use of these mineral additives, our CEM Plus product meets the criteria set forth in the regulation and contributes to both emissions reductions and sustainable construction practices in line with public procurement requirements. Our product, 'CEM Plus,' is designed to be a more environmentally friendly cement with equivalent performance with 80.5% clinler/cement ratio, achieving a 115% increase in the use of alternative raw materials and reducing carbon emissions by 70 kg CO2 per ton of cement. Specifically, carbon emissions have been reduced from 753 kg CO2/t cement to 683 kg CO2/t cement. In alignment with the Green Cement Regulation, which mandates the use of green cement in public tenders, we are positioning our products to match the definitions outlined in the regulation.

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

Select from:

No

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

12.6

Row 2

(7.74.1.1) Level of aggregation

Select from:

Product or service

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

Select from:

Other, please specify :Turkish Patent Institute

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

Power

Other, please specify :Blended cement

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

According to the Green Cement Regulation, green cements are those that fall under the TS EN 197-1 standard, excluding CEM I-Portland cement, and contain less than 95% clinker and more than 5%. Limak Çimento produces a diverse range of 26 conventional cement products, including but not limited to: TS EN 197-1 CEM II B-LL 32,5 R TS EN 197-1 CEM II B-LL 32,5 R TS EN 197-1 CEM II B-LL 32,5 R TS EN 197-1 CEM II B-M(P-LL) 32,5N TS EN 197-1 CEM II B-M(P-LL) 32,5N TS EN 197-1 CEM II B-M(P-LL) 32,5N TS EN 197-1 CEM II B-M(P-LL) 32,5R TS EN 197-1 CEM II B-M(P-LL)32,5R TS EN 197-1 CEM II C-M(V-LL)32,5N TS EN 197-1 CEM IV B-P 32,5 N TS EN 197-5 CEM II C-M(P-LL) 32,5N TS EN 197-5 CEM II C-M(V-LL) 32,5N TS EN 197-1 CEM II A-LL 42,5 R TS EN 197-1 CEM II A-LL 42,5 R TS EN 197-1 CEM II A-M(P-LL) 42,5N TS EN 197-1 CEM II A-M(P-LL) 42,5N TS EN 197-1 CEM II A-M(P-LL)42,5N TS EN 197-1 CEM II B-LL 42,5 N TS EN 197-1 CEM II B-M(P-LL) 42,5N TS EN 197-1 CEM II B-M(P-LL) 42,5N TS EN 197-1 CEM II/A-LL 42,5 N TS EN 197-1 CEM II/A-LL 42,5 N TS EN 197-1 CEM II/B-M(V-LL)42,5 R TS EN 197-1 CEM/II B-M(V-LL)42,5 R TS EN 197-1 CEM IV A(P) 42,5 N-SR TS EN 197-1 CEM IV A(P) 42,5 N-SR In addition to CEM Plus, we offer a portfolio of green products, which contribute to a total of 34.4% of the total product sales. This includes lower-emission cement types, highlighting the company's commitment to sustainability

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

Select from:

No

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

34.4

[Add row]

C9. Environmental performance - Water security

(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

The water drawn from the well is directly monitored monthly with the help of meters

(9.2.4) Please explain

At Limak Cement Group, we diligently track, measure, and disclose the total volume of water withdrawn across all our facilities. This information is clearly outlined in our water footprint reports, which are integral to our water stewardship efforts. Recognizing the critical importance of water conservation and management, we ensure that all water withdrawal data are presented in a straightforward and transparent manner. Looking ahead to next year, our goal is to implement a water management platform as part of our commitment to environmental, social, and governance (ESG) initiatives, alignment with green policies, sustainable production methods. This platform will be designed to facilitate leak detection and provide daily, weekly, and monthly reporting, in-depth consumption analysis, and continuous monitoring of water usage through an online system.

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

The water drawn from the well is directly monitored monthly with the help of meters.

(9.2.4) Please explain

As the Limak cement group, the monthly monitoring of the water flow chart, water uses, meter indices, water usage dashboard is done by the maintenance and repair department. Consolidated tables are controlled by the sustainability and climate change department. The water withdrawn in all our factories is drawn from the underground deep water well line and monitored by meters. There is no water withdrawal from any source other than water wells.

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

Based on the capacity of our water plants, we conduct water analysis bi-monthly at certain facilities and quarterly at others. To monitor the quality of water withdrawals, we employ on-site testing, including Calcium, magnesium and pH assessments

(9.2.4) Please explain

We ensure that all our operational sites are rigorously monitored for water usage, particularly in relation to wastewater management. Our plants that are connected to the sewage system have secured a discharge quality control license from the local authorities. Biannually, municipal officials collect samples for testing, and the results consistently meet the required standards. In compliance with the Turkish Environmental Permit and License Regulation, our factories treat wastewater using systems that adhere to the Water Pollution Control Regulation's specified limit values. To verify the quality of the treated effluent, accredited laboratories conduct COD (Chemical Oxygen Demand), BOD (Biochemical Oxygen Demand), pH, and suspended solids analyses at intervals mandated by the relevant regulations. Depending on the capacity of our treatment facilities, these wastewater analyses are performed by accredited laboratories bi-monthly at some of our plants and quarterly at others

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

There are meters at the entrance of the facility and the units connected to it and monthly measurements are carried out. Accordingly, wastewater data is determined by calculation method according to the meter data.

(9.2.4) Please explain

We determine all the points where water is discharged from the company's operations. This includes effluent from wastewater treatment plants and any other sources of water leaving the company's premises. Water discharge volumes are monitored at site level on daily basis and are consolidated at corporate level on monthly basis and the same will continue in the future. We maintain detailed records of all measurements and analyses.

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 regularly calibrate and maintain all measurement equipment to ensure ongoing accuracy and reliability of the data collected.

(9.2.4) Please explain

Water discharges—volumes by destination are meticulously tracked at each individual site and then aggregated at the corporate level every quarter. We closely observe the total volume of water discharged, categorizing it by the type of receiving environment. This encompasses the aggregate amount of water effluents released during the reporting period to various destinations, including groundwater systems, networks, and other specified outlets. Our monitoring process captures both point source discharges, which occur at specific, identifiable locations, and non-point source discharges, which are spread out or occur in an undefined manner across the land. We ensure that all forms of discharge, whether funneled through a single conduit or diffused over a wider area, are accounted for to provide a comprehensive overview of our water discharge footprint. We employ a combination of manual measurements and automated monitoring systems, enabling us to gather real time data and respond promptly.

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

There are meters at the entrance of the facility and the units connected to it and monthly measurements are carried out. Accordingly, wastewater data is determined by calculation method according to the meter data. These discharge points are categorized based on the type of treatment the water has undergone, such as pre-treatment, primary, secondary, or tertiary treatment, or no treatment at all for non-contaminated water. Output meters are added to our investment plans and will be implemented.

(9.2.4) Please explain

The collected data from the flow meters are analysed to determine the effectiveness of the treatment methods and to ensure compliance with environmental regulations. Our factories are equipped with specially designed biological package treatment plants to process domestic wastewater. After treatment, this wastewater is discharged into dry river beds. For factories with access to municipal sewer lines, domestic wastewater is discharged directly into these sewers. We have also constructed settling ponds to treat surface water collected on site. The treated water from these ponds is then reused for dust suppression and irrigation at our plants. Due to the nature of our production processes, which involve the use of water in high-temperature cooling processes, a significant portion of water evaporates. Current Turkish environmental regulations do not require the installation of meters for wastewater discharges, although meters are installed at plant entrances and associated units.

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

The frequency of wastewater analysis at our treatment plants is determined by their respective capacities. At certain facilities, we conduct these analyses bi-monthly, while at others, the evaluations are carried out on a quarterly basis, every four months. To monitor the quality of waste water, we employ on-site testing, including BOD, COD and pH assessments

(9.2.4) Please explain

We adhere to stringent regulations regarding wastewater treatment and routinely measure standard effluent parameters to ensure compliance. In instances where our factories are connected to municipal sewer lines, the wastewater produced from both usage and industrial processes is channelled into the sewer system. These

facilities have secured the necessary discharge quality control licenses from the respective local authorities. Biannual sampling is conducted by municipal officials. Our treatment systems, installed within the factories, are designed to comply with the Turkish Environmental Permit and License Regulation, operating within the stringent limits set by the water pollution control regulation. To assess the quality of our effluent, we conduct analyses for Chemical Oxygen Demand (COD), Biochemical Oxygen Demand (BOD), pH, and suspended solids (SS) at intervals mandated by regulation. These analysis are carried out by accredited laboratories.

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

(9.2.1) % of sites/facilities/operations

Select from:

Not monitored

(9.2.4) Please explain

As there is no legal obligations to monitor specific pollutants, we do not invest in the necessary testing and treatment processes, especially if it is under financial pressure to minimize operational costs. Our prioritization of other environmental or operational issues that are deemed more critical or urgent. This could lead to a perception that water discharge quality is a lower risk, especially if there has been no history of water pollution incidents linked to the our company

Water discharge quality – temperature

(9.2.1) % of sites/facilities/operations

Select from:

Not monitored

(9.2.4) Please explain

In our factories, the water utilized for milling processes and cooling the beds of rotary kilns circulates within a closed-loop system, preventing any water wastage. The only water loss occurs through evaporation, and to compensate for this, we replenish the system with water from our wells. Additionally, surface runoff is gathered in sedimentation ponds via a drainage system. Once treated, this water is repurposed for dust control, cleaning roads, and irrigating the facility grounds. Domestic wastewater generated on-site is processed through a biological package treatment plant. After treatment, it is either released into a dry stream or directed into the municipal sewage system. As a result of these practices, there is no impact on the temperature of the wastewater at the point of discharge.

Water consumption – total volume

(9.2.1) % of sites/facilities/operations

Select from:

100%

(9.2.2) Frequency of measurement

Select from:

Daily

(9.2.3) Method of measurement

Total volume of water consumption is monitored at each site on daily basis and is consolidated at corporate level on monthly basis. We gauge water usage across various processes on a monthly basis through meter readings. These meters are strategically placed within the operational processes to capture accurate measurements. The recorded data are then sent to the Sustainability and Climate Change Directorate for thorough evaluation

(9.2.4) Please explain

Water consumption is tracked across several units, including the rotary kiln cooling tower, raw meal mill, clinker cooling system, technological pools, boiler room, residential quarters, hydrant lines, and water jets. In the upcoming year, our intention is to develop a comprehensive water management platform. This initiative falls in line with our commitment to environmental, social, and corporate governance (ESG) standards, as well as our dedication to green policies, sustainable production, and adherence to the European Water Framework Directive. The proposed platform will enable us to enhance our water management practices significantly. We aim to incorporate features for detecting leaks and generating daily, weekly, and monthly consumption reports. Additionally, the platform will facilitate real-time monitoring of water usage, allowing for continuous oversight and analysis through an online interface.

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

The approach to measuring water usage differs from site to site. While some locations employ flow meters to accurately gauge water flow, others calculate the volume of water reused by assessing the decrease in water withdrawals. Water recycled/reused metrics are diligently tracked at each individual site on a monthly schedule. This data is then compiled and reviewed at the corporate level every month.

(9.2.4) Please explain

To gain a complete understanding of our water footprint, we conduct an extensive evaluation across all our plants. This assessment encompasses all aspects of water management, including water withdrawal, discharge, recycling, and overall consumption. By doing so, we ensure that we have a holistic perspective on how water is utilized and conserved within our operations. In addition to these measures, we are constantly seeking ways to enhance our water recycling and reuse strategies. We explore innovative technologies and processes that can further reduce our water footprint, such as advanced filtration systems, rainwater harvesting, and the implementation of water-efficient practices in our production processes. Our goal is to not only track and report on water usage but also to continuously improve our water conservation efforts, thereby contributing to the sustainability of the precious water resources we depend on. The quantities of water that are recycled or reused are tracked.

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:

Quarterly

(9.2.3) Method of measurement

All of our employees are provided with healthy water consumption conditions specified within the scope of the ISO 45001 standard regarding health services. Accordingly, biological water analyzes are carried out at 3-month intervals and chemical water analyzes are performed at 6-month intervals in our factories

(9.2.4) Please explain

We ensure that all our employees have access to safe drinking water that meets the requirements set forth by the ISO 45001 standard for occupational health and safety services. In line with this standard, we conduct biological water analyses quarterly and chemical water analyses semi-annually at our factories. Additionally, to eliminate any potential health hazards from microorganisms, we implement disinfection processes on the municipal water supply
[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)

1255.99

(9.2.2.2) Comparison with previous reporting year

Select from:

About the same

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

Increase/decrease in efficiency

(9.2.2.4) Five-year forecast

Select from:

Lower

(9.2.2.5) Primary reason for forecast

Select from:

Investment in water-smart technology/process

(9.2.2.6) Please explain

In 2023, the aggregate volume of water extracted from the wells across all our manufacturing plants was recorded in megalitres per year. This figure remains consistent with the volume reported in our initial year of reporting based on our threshold. A variance within 5% is typically classified as "about the same," denoting a

negligible deviation in water consumption from the preceding fiscal year. This marginal fluctuation is often within the expected range of operational norms and does not necessarily indicate a substantive change in water management practices or policies. Our comparative analysis reveals a change between 5% and 10%, it is characterized as "higher/lower," suggesting a discernible but not drastic shift in water usage that may result from operational efficiency improvements or changes in production demands. A change exceeding 10% is articulated as "much higher/lower," denoting a substantial alteration in water consumption patterns. To provide context for this comparison and our five-year projection, it's important to note the standards, methodologies, and assumptions that have been employed in compiling these volumetric data. Therefore, we expect lower water usage for five-year projection. It is our target to decrease water usage.

Total discharges

(9.2.2.1) Volume (megaliters/year)

308.74

(9.2.2.2) Comparison with previous reporting year

Select from:

About the same

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

Increase/decrease in efficiency

(9.2.2.4) Five-year forecast

Select from:

Lower

(9.2.2.5) Primary reason for forecast

Select from:

Investment in water-smart technology/process

(9.2.2.6) Please explain

The total amount of water discharges of all our factories in 2023. is calculated as megalitres/year. Compared to the first reporting year, the amount of water discharges are almost the same. We plan to establish a system for reusing water and improve wastewater treatment processes. The observed variance falls within the 5% threshold, which we classify as "about the same." This indicates a minimal divergence in water usage compared to the previous year and is typically regarded as being within the acceptable bounds of our operational expectations. Such minor fluctuations are not indicative of significant shifts in our water management strategies or practices. Our analysis indicates that any variation between 5% and 10% would be labelled as "higher/lower," pointing to a noticeable yet moderate change in water consumption. This could be attributed to enhancements in operational efficiencies or adjustments in production levels. If the variation exceeds 10%, it would be described as "much higher/lower," signalling a marked change in our water usage patterns. In light of these metrics and our commitment to sustainability, we have set forth a five-year projection that anticipates a reduction in water usage. Our objective is to achieve a downward trend in water consumption, adhering to the rigorous standards, methodologies, and assumptions that underpin our data collection and reporting processes

Total consumption

(9.2.2.1) Volume (megaliters/year)

947.25

(9.2.2.2) Comparison with previous reporting year

Select from:

About the same

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

Increase/decrease in efficiency

(9.2.2.4) Five-year forecast

Select from:

Lower

(9.2.2.5) Primary reason for forecast

Select from:

Investment in water-smart technology/process

(9.2.2.6) Please explain

In 2023, we recorded the total water usage for all our factories, drawing from well sources, in megalitres annually. This figure aligns with the consumption data from our initial year of reporting. The observed variance falls within the 5% threshold, which we classify as "about the same." This indicates a minimal divergence in water usage compared to the previous year and is typically regarded as being within the acceptable bounds of our operational expectations. Such minor fluctuations are not indicative of significant shifts in our water management strategies or practices. Our analysis indicates that any variation between 5% and 10% would be labelled as "higher/lower," pointing to a noticeable yet moderate change in water consumption. This could be attributed to enhancements in operational efficiencies or adjustments in production levels. If the variation exceeds 10%, it would be described as "much higher/lower," signalling a marked change in our water usage patterns. In light of these metrics and our commitment to sustainability, we have set forth a five-year projection that anticipates a reduction in water usage. Our objective is to achieve a downward trend in water consumption, adhering to the rigorous standards, methodologies, and assumptions that underpin our data collection and reporting processes. Moving forward, our cement company's five-year strategic plan is dedicated to lowering water consumption. This plan involves adopting water-conserving technologies, refining our processes for better water efficiency, and expanding our efforts in water recycling and reuse. Our objective is to markedly decrease water use, thereby fostering more sustainable practices and reducing our impact on the environment

[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)

1130

(9.2.4.3) Comparison with previous reporting year

Select from:

About the same

(9.2.4.4) Primary reason for comparison with previous reporting year

Select from:

Increase/decrease in business activity

(9.2.4.5) Five-year forecast

Select from:

Lower

(9.2.4.6) Primary reason for forecast

Select from:

Increase/decrease in business activity

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

89.97

(9.2.4.8) Identification tool

Select all that apply

WRI Aqueduct

(9.2.4.9) Please explain

According to WRI; Our Plants located in Anka, Balıkesir, Ergani, Şanlıurfa, Kilis and Trakya facilities located in water stress risk areas. Although we have facility specific management about water consumption from water stress areas, our 'Smart Water Management Project' implement for our whole facilities. For factories located in water-stressed areas, this project can be utilized to implement a comprehensive water management system that aims for real-time tracking, analysis, management, and reporting of all water produced and consumed from the wells to the final point of use. The project's objectives include updating all plant meters for digital transformation, enabling instant digital monitoring of water consumption data, and tracking the efficiency of equipment used in water production, consumption, and transportation. Initiated as a pilot at the Şanlıurfa plant, the project will be rolled out to all group factories upon successful implementation. The process involves converting all water meters to pulse output meters, preparing for digital transformation. The project's primary goal is to optimize costs and water usage to establish a sustainable and efficient water management system. At the Anka plant, situated in a water-stressed region, a comprehensive water conservation strategy is being implemented to minimize water usage. This strategy includes upgrading mechanical water meters to digital pulse output meters for enhanced monitoring, retrofitting communal faucets with photocell technology to conserve water, transitioning to controlled drip irrigation systems for efficient tree watering, and replacing outdated water transfer pumps with highly efficient, low-energy, fully automatic hydrofor systems. Additionally, the plant is ensuring that fire suppression systems are used solely for their intended purpose and is considering the acquisition of new, more suitable water conditioning units. These initiatives collectively aim to significantly reduce the plant's water footprint in response to the challenges posed by water scarcity. For our Balıkesir plant, it is anticipated that by reviewing the water consumed

for peripheral road irrigation, raw material site buildings, and quarry watering, at least 22.6% savings can be achieved. For our Ergani Plant, water usage strategy is informed by a comprehensive assessment of our water resources and infrastructure. The adequacy of our wells has been established, ensuring that our water supply is both suitable and sufficient for our operational needs. However, challenges with our water transfer systems, such as insufficient pump and hydrofor capacities during peak usage, corrosion in hot and cold-water lines, and inadequate pipe diameters, necessitate a strategic approach to water management. To address these issues, we are committed to upgrading our water infrastructure. This includes procuring pumps and hydrofors with appropriate flow rates and pressures, establishing separate fire suppression water lines, renewing pipes with suitable diameters, and ensuring proper insulation to prevent heat loss and corrosion. These improvements are scheduled for completion by August 2024, with further exploration and feasibility studies to be conducted by the end of 2024 for inclusion in the 2025 investment plan. Our water usage strategy involves segregating process water, utility water, irrigation, and fire system lines to improve monitoring and management. This will enable more accurate measurement and control of water consumption across different uses, aligning with our goal to reduce our water footprint. For our Trakya Plant; by utilizing discharge waters and regulating lawn and landscape irrigation, an approximate savings of 32.4% can be achieved. In our Kilis plant, studies are carried out to minimize the problem of water stress and reduce water consumption. The use of discharge waters is planned to reduce water consumption by approximately 16.7%. When considering the Improvement and Development Suggestions, there is a high potential to approach the target value. In the arid region of Şanlıurfa, where water stress is a significant concern, our water usage strategy is designed with sustainability and efficiency at its core. To address the risks associated with water stress, it is imperative to periodically utilize the third well, which remains unused, to ensure a balanced draw from our water sources. Moreover, we have identified the need for improvements in our water transfer systems, including the replacement of deteriorating pipes and the maintenance of a dry and clean pipe gallery, to prevent water loss and contamination.

[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

Water for our operations is exclusively sourced from wells, rather than being supplied by surface waters like wetlands and lakes. Rainwater is gathered by our drainage system and directed to sedimentation ponds. After undergoing treatment, this collected rainwater is then utilized for dust suppression and irrigation processes

Brackish surface water/Seawater

(9.2.7.1) Relevance

Select from:

Not relevant

(9.2.7.5) Please explain

Water is not supplied from sources such as brackish water and seawater.

Groundwater – renewable

(9.2.7.1) Relevance

Select from:

Relevant

(9.2.7.2) Volume (megaliters/year)

1172.19

(9.2.7.3) Comparison with previous reporting year

Select from:

About the same

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

Increase/decrease in efficiency

(9.2.7.5) Please explain

Water for our operations is exclusively sourced from wells, rather than being supplied by surface waters like wetlands and lakes. Rainwater is gathered by our drainage system and directed to sedimentation ponds. After undergoing treatment, this collected rainwater is then utilized for dust suppression and irrigation processes. The observed variance falls within the 5% threshold, which we classify as "about the same.", 5% and 10% would be labelled as "higher/lower," and the variation exceed 10%, it would be described as "much higher/lower,"

Groundwater – non-renewable

(9.2.7.1) Relevance

Select from:

Not relevant

(9.2.7.5) Please explain

There is no water supply from the non-renewable underground water well

Produced/Entrained water

(9.2.7.1) Relevance

Select from:

Not relevant

(9.2.7.5) Please explain

There is no use of produced water.

Third party sources

(9.2.7.1) Relevance

Select from:

Relevant

(9.2.7.2) Volume (megaliters/year)

83.8

(9.2.7.3) Comparison with previous reporting year

Select from:

About the same

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

Increase/decrease in business activity

(9.2.7.5) Please explain

In factories, bottled water used for drinking purposes is procured externally. The observed variance falls within the 5% threshold, which we classify as "about the same.", 5% and 10% would be labeled as "higher/lower," and the variation exceed 10%, it would be described as "much higher/lower,"
[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

Our factories are equipped with biological package treatment plants that process domestic wastewater efficiently. Once this wastewater is treated, it is released into a dry stream, ensuring there is no discharge into any surface water bodies. For facilities that have access to municipal sewer infrastructure, the treated domestic wastewater is safely discharged into the sewer system, adhering to all regulatory standards and environmental best practices. There is no discharge from surface water bodies such as wetlands and lakes.

Brackish surface water/seawater

(9.2.8.1) Relevance

Select from:

Not relevant

(9.2.8.5) Please explain

Our factories are equipped with biological package treatment plants that process domestic wastewater efficiently. Once this wastewater is treated, it is released into a dry stream, ensuring there is no discharge into any surface water bodies. For facilities that have access to municipal sewer infrastructure, the treated domestic wastewater is safely discharged into the sewer system, adhering to all regulatory standards and environmental best practices. There is no discharge from seawater

Groundwater

(9.2.8.1) Relevance

Select from:

Not relevant

(9.2.8.5) Please explain

Our factories are equipped with biological package treatment plants that process domestic wastewater efficiently. Once this wastewater is treated, it is released into a dry stream, ensuring there is no discharge into any surface water bodies. For facilities that have access to municipal sewer infrastructure, the treated domestic wastewater is safely discharged into the sewer system, adhering to all regulatory standards and environmental best practices. There is no discharge from groundwater.

Third-party destinations

(9.2.8.1) Relevance

Select from:

Relevant

(9.2.8.2) Volume (megaliters/year)

308.74

(9.2.8.3) Comparison with previous reporting year

Select from:

About the same

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

Increase/decrease in efficiency

(9.2.8.5) Please explain

Our factories are equipped with biological package treatment plants that process domestic wastewater efficiently. Once this wastewater is treated, it is released into a dry stream, ensuring there is no discharge into any surface water bodies. For facilities that have access to municipal sewer infrastructure, the treated domestic wastewater is safely discharged into the sewer system, adhering to all regulatory standards and environmental best practices. The observed variance falls within the 5% threshold, which we classify as "about the same.", 5% and 10% would be labeled as "higher/lower," and the variation exceed 10%, it would be described as "much higher/lower,"

[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

There is no process-generated wastewater in our factories, treatment is applied only for domestic wastewater. Therefore, there is no need for tertiary treatment.

Secondary treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

Relevant

(9.2.9.2) Volume (megaliters/year)

149.94

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

About the same

(9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

Increase/decrease in efficiency

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

Select from:

71-80

(9.2.9.6) Please explain

We comply with regulatory standards for secondary water treatment by implementing biological processes aimed at reducing organic pollutants and suspended solids in wastewater. In Türkiye, The Water Pollution Control Regulation is a legislative framework that sets forth the guidelines and standards for preventing, reducing, and controlling water pollution to protect water resources and public health. In the context of secondary treatment, this regulation typically mandates that industrial facilities, such as cement companies, implement biological treatment processes to significantly reduce organic content, nutrients, and other dissolved pollutants in their wastewater before discharge. These standards ensure that the treated water meets specific quality criteria, thus minimizing the environmental impact of effluents on aquatic ecosystems and complying with the legal requirements for wastewater management. This involves adopting technologies such as activated sludge systems or biofilters, closely monitoring treatment efficiency through regular sampling and quality control measures, and ensuring all operations are in line with specific regional and industry standards. We maintain rigorous documentation and reporting practices to demonstrate compliance with these standards, while also engaging in continuous improvement efforts to enhance treatment effectiveness. Through these measures, we do not only meets regulatory requirements but also contributes to environmental sustainability by minimizing its impact on water resources.

Primary treatment only

(9.2.9.1) Relevance of treatment level to discharge

Select from:

Not relevant

(9.2.9.6) Please explain

None of the plants include a primary treatment only. In 5 of our plants we comply with regulatory standards for secondary water treatment by implementing biological processes aimed at reducing organic pollutants and suspended solids in wastewater. And in the remaining two plants, the wastewater is directly transferred to the municipal sewage line for further treatment processes.

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

We comply with regulatory standards for water discharges, there are no plants where the wastewater is discharged to natural environment without treatment.

Discharge to a third party without treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

Relevant

(9.2.9.2) Volume (megaliters/year)

158.8

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

- About the same

(9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

- Increase/decrease in efficiency

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

Select from:

- 21-30

(9.2.9.6) Please explain

The Balıkesir and Trakya facilities are not included in the concerns regarding the implementation of secondary wastewater treatment processes as mandated by the Water Pollution Control Regulation. This is because these factories are directly connected to the municipal wastewater treatment plants through their network connections, ensuring their compliance with the required standards without the need for additional biological treatment systems within the facilities themselves. Therefore, the challenges of local infrastructure limitations, technological constraints, or financial hurdles, which might affect the adoption of necessary treatment systems in other contexts, do not apply to these facilities. Consequently, there is no system inadequacy, and the facilities are in alignment with environmental responsibilities and legal obligations for water discharge quality without the need for alternative solutions or facility upgrades

Other

(9.2.9.1) Relevance of treatment level to discharge

Select from:

- Not relevant

(9.2.9.6) Please explain

*There are no other treatment methods applied.
[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

7

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

Select from:

100%

(9.3.4) Please explain

In the context of our company, direct operations would typically include the extraction of raw materials, such as limestone and clay, from quarries; the production of clinker in kilns; the grinding of clinker to produce cement; and the packaging and distribution of the final product. These operations are directly linked to our core business processes and have a significant impact on our operational efficiency, costs, and environmental footprint, including water usage. The upstream value chain, on the other hand, encompasses all the activities and processes that occur before our direct operations. For Limak Cement, this would include the sourcing of raw materials that are not extracted by us, such as additives and supplementary materials, as well as the procurement of energy and water resources required for cement production. Therefore, we have identified substantive water-related dependencies, impacts, risks, and opportunities would depend on the scale of our operations and the geographic locations of our plants. Our facilities could be at risk of water scarcity, which would affect the availability of water for production processes, or they could be located in areas with water surplus, which presents opportunities for sustainable water management and potential cost savings. Identifying these factors is crucial for our risk management and sustainability strategies.

Upstream value chain

(9.3.1) Identification of facilities in the value chain stage

Select from:

- No, we have assessed this value chain stage but did not identify any facilities with water-related dependencies, impacts, risks, and opportunities

(9.3.4) Please explain

We have assessed this value chain stage and in the future we will describe some facilities
[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)

Anka Plant

(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

Sakarya

(9.3.1.8) Latitude

39.6

(9.3.1.9) Longitude

32.42

(9.3.1.10) Located in area with water stress

Select from:

Yes

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

127.66

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

Much lower

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

127.66

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0.11

(9.3.1.21) Total water discharges at this facility (megaliters)

45.36

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

About the same

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

45.36

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

82.3

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

Much lower

(9.3.1.29) Please explain

Based on impact, dependencies, risks and opportunities analysis for Anka plant, the adequacy and sufficiency of water resources are currently being provided by a single well with a capacity of 40 m³/hour. Efforts are ongoing to select suitable pumps through a pump efficiency study. There is a sand filter and a softening device for the purpose of water conditioning. Distinctions have been made between process and usage water rights for the purpose of measuring water consumption amounts, with process waters passing through the sand filter. Suitable pumps are selected through a pump efficiency study, and air pressure checks and membrane status inspections are carried out at least three times a year, every four months. Concrete pools are deemed appropriate and sufficient for water storage and conditioning. Attention should be paid to issues such as improving lawn irrigation systems and ensuring that fire extinguishing systems are not used for purposes other than their intended use. The target dates for these processes cover the years 2024 and 2025.

Row 2

(9.3.1.1) Facility reference number

Select from:

Facility 2

(9.3.1.2) Facility name (optional)

Balikesir Plant

(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 :Susurluk Basin

(9.3.1.8) Latitude

39.62

(9.3.1.9) Longitude

27.88

(9.3.1.10) Located in area with water stress

Select from:

Yes

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

219.33

(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

219.22

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0.11

(9.3.1.21) Total water discharges at this facility (megaliters)

66.26

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

Much 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

66.26

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

152.96

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

Higher

(9.3.1.29) Please explain

The analysis of water resources' adequacy and sufficiency for Balıkesir plant indicates that there are two wells considered to be sufficient and suitable. To reduce risks, our analyses emphasize the importance of monitoring the static and dynamic water levels of the wells. For this purpose, two new meters with pulse outputs will be requested. In terms of water storage, a 200 m³ reinforced concrete water reserve tank is suitable for storing raw water. A new galvanized or stainless steel water tank with a capacity of 60-100m³ should be acquired for potable water. A request for a 100m³ tank for potable water has been made, and the 200m³ concrete water reserves will be used for raw water. To reduce water consumption, an overall review of water usage will be conducted, and points of savings will be identified. Field irrigation, quarry watering, and subcontractor field water consumption for raw materials have contributed to this year's increase in consumption. Measures will include controlling field irrigation, canceling the water provided for quarry watering, and monitoring the water supplied to the raw material subcontractor's site. Additionally, the existing mechanical water meters are not suitable for transferring information to the automation system as part of digitalization (condition monitoring) efforts. Pulse output meters should be installed for the new water treatment system and the coal conveyor belt dust suppression system.

Row 3

(9.3.1.1) Facility reference number

Select from:

Facility 3

(9.3.1.2) Facility name (optional)

Ergani Plant

(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

- Tigris & Euphrates

(9.3.1.8) Latitude

38.28

(9.3.1.9) Longitude

39.74

(9.3.1.10) Located in area with water stress

Select from:

- Yes

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

166.78

(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

166.76

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0.02

(9.3.1.21) Total water discharges at this facility (megaliters)

9.67

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

Much higher

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

9.67

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

155.09

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

About the same

(9.3.1.29) Please explain

The analysis indicates that there are two wells with sufficient capacity to meet current needs for water source analysis. A comprehensive upgrade is planned, focusing on energy efficiency and proper insulation, including the procurement of a new hydrophore and pipeline renovation. With the latest upgrades, water conditioning is adequate. Plans exist to design separate lines for each use to improve accuracy and management. Lawn irrigation is manual, and a transition to modern systems is planned. Procedures will be established to more effectively manage the water provided to contractors for quarry watering. Discharged water quantities are minimal, and efforts will focus on reuse and monitoring. Improvement suggestions include digitalization, the use of efficient hydrophore pumps, and dust suppression systems.

Row 4

(9.3.1.1) Facility reference number

Select from:

Facility 4

(9.3.1.2) Facility name (optional)

Trakya Plant

(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

Maritsa

(9.3.1.8) Latitude

41.63

(9.3.1.9) Longitude

27.5

(9.3.1.10) Located in area with water stress

Select from:

Yes

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

288.88

(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

288.87

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0.01

(9.3.1.21) Total water discharges at this facility (megaliters)

92.53

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

Much higher

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

92.53

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

196.34

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

Much lower

(9.3.1.29) Please explain

The water source analysis has identified six wells as being sufficient. Maintenance of the pumps and monitoring of static and dynamic water levels are ensured. Reliability is increased through actions for the maintenance of the first well's pump and the installation of a meter for the second well, as well as the activation of the wells. Water storage is adequate with a 350 m³ tank for raw water and modular tanks are sufficient for potable water. Maintenance for the softener and regular checks for the sand filter are provided. All mechanical meters have been replaced with pulse output meters, and all consumption points are being measured. Improvement suggestions include digitalization, the use of efficient hydrophore pumps, and regular maintenance of water conditioning units

Row 5

(9.3.1.1) Facility reference number

Select from:

Facility 5

(9.3.1.2) Facility name (optional)

Şanlıurfa Plant

(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

Tigris & Euphrates

(9.3.1.8) Latitude

37.28

(9.3.1.9) Longitude

38.73

(9.3.1.10) Located in area with water stress

Select from:

Yes

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

123.04

(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

123.01

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0.03

(9.3.1.21) Total water discharges at this facility (megaliters)

28.23

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

About the same

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

28.23

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

94.78

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

About the same

(9.3.1.29) Please explain

The facility's water resources are considered sufficient with three wells. To optimize usage, it is planned to periodically activate the unused third well. There is a renovation plan for the guesthouse and affected areas, with budgeting and implementation expected to be completed at the beginning of 2025. Water conditioning systems, including sand filters, softeners, RO, and UV devices, are functioning well. Regular maintenance and checks are very important to ensure their continuous performance, and periodic work orders are already in place. Quarry watering for raw material extraction is high, and contractors will be organized with appropriate procedures.

Row 6

(9.3.1.1) Facility reference number

Select from:

Facility 6

(9.3.1.2) Facility name (optional)

Kilis Plant

(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

- Asi (Orontes)

(9.3.1.8) Latitude

36.8

(9.3.1.9) Longitude

37.02

(9.3.1.10) Located in area with water stress

Select from:

- Yes

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

204.27

(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

204.26

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0.01

(9.3.1.21) Total water discharges at this facility (megaliters)

34.14

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

About the same

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

34.14

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

170.12

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

Higher

(9.3.1.29) Please explain

The facility's water resources are considered sufficient with two active wells providing a total capacity of 56 m³/hour. Water conditioning is adequate with active sand filters, softeners, RO, and UV devices. The installation of meters has improved monitoring, and the consumption of discharge water is being further reduced. Measurement and monitoring are provided. All necessary measuring devices have been installed, and further separation of lines to enhance monitoring is planned.

Improvement plans include the digitalization of measurements, dust water systems for road watering, installation of photo-sensor faucets, and the use of efficient hydrophore pumps.

Row 7

(9.3.1.1) Facility reference number

Select from:

Facility 7

(9.3.1.2) Facility name (optional)

Kurtalan Plant

(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

Tigris & Euphrates

(9.3.1.8) Latitude

37.96

(9.3.1.9) Longitude

41.71

(9.3.1.10) Located in area with water stress

Select from:

No

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

125.9

(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

125.89

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0.01

(9.3.1.21) Total water discharges at this facility (megaliters)

32.51

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

Much higher

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

32.51

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

93.38

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

Higher

(9.3.1.29) Please explain

Based on the impact, dependencies, risks, and opportunities analysis for the Kurtalan plant, the assessment of the facility's water resources has identified dependencies and impacts related to water, with four wells demonstrating sufficient availability to provide the total water production capacity. Additionally, storage tanks for raw water are suitable. Water conditioning systems, including sand filters, water softeners, chlorine, reverse osmosis (RO), and ultraviolet (UV) devices, are generally adequate. Water consumption has been relatively stable over the years, and the facility's consumption is below the group average. The facility is also working on separating and measuring irrigation water and is reviewing irrigated areas to optimize water usage. There is a focus on reusing discharge water and optimizing irrigation practices to achieve savings

[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

ISO 14046:2014 Standard and ISAE 3000. The definitions used are based on the methodology of the Global Cement and Concrete Association (GCCA)

Water withdrawals – volume by source

(9.3.2.1) % verified

Select from:

76-100

(9.3.2.2) Verification standard used

ISO 14046:2014 Standard and ISAE 3000. The definitions used are based on the methodology of the Global Cement and Concrete Association (GCCA)

Water withdrawals – quality by standard water quality parameters

(9.3.2.1) % verified

Select from:

76-100

(9.3.2.2) Verification standard used

ISO 14046:2014 Standard and ISAE 3000. The definitions used are based on the methodology of the Global Cement and Concrete Association (GCCA)

Water discharges – total volumes

(9.3.2.1) % verified

Select from:

76-100

(9.3.2.2) Verification standard used

ISO 14046:2014 Standard and ISAE 3000. The definitions used are based on the methodology of the Global Cement and Concrete Association (GCCA)

Water discharges – volume by destination

(9.3.2.1) % verified

Select from:

76-100

(9.3.2.2) Verification standard used

ISO 14046:2014 Standard and ISAE 3000. The definitions used are based on the methodology of the Global Cement and Concrete Association (GCCA)

Water discharges – volume by final treatment level

(9.3.2.1) % verified

Select from:

76-100

(9.3.2.2) Verification standard used

ISO 14046:2014 Standard and ISAE 3000. The definitions used are based on the methodology of the Global Cement and Concrete Association (GCCA)

Water discharges – quality by standard water quality parameters

(9.3.2.1) % verified

Select from:

76-100

(9.3.2.2) Verification standard used

ISO 14046:2014 Standard and ISAE 3000. The definitions used are based on the methodology of the Global Cement and Concrete Association (GCCA)

Water consumption – total volume

(9.3.2.1) % verified

Select from:

76-100

(9.3.2.2) Verification standard used

ISO 14046:2014 Standard and ISAE 3000. The definitions used are based on the methodology of the Global Cement and Concrete Association (GCCA)
[Fixed row]

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

(9.5.1) Revenue (currency)

14781940252.41

(9.5.2) Total water withdrawal efficiency

11769154.41

(9.5.3) Anticipated forward trend

In the coming years, we aim to improve water withdrawal quality and boost resource efficiency. We're developing a water management platform aligned with ESG practices, green reconciliation, clean production, and the European Water Framework Directive. Our efforts have been concentrated on enhancing water efficiency within our operations, promoting reuse and recycling, collecting rainwater, using advanced treatment technologies, reducing leakages and losses, and raising awareness.

[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 facilities are engaged in the production of cement, which is fundamentally characterized as a hydraulic binding material. This material is produced by finely grinding a blend of natural limestone and clay, which has been subjected to high-temperature heating. Additionally, our cement products are free from hazardous substances, ensuring that their utilization does not result in the creation of hazardous waste.

[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

In our Limak Cement factories, mains and ground water are basically used for cooling, dust removal, washing and irrigation. With the awareness that water is a limited resource, efficiency and recycling of water resources are at the forefront. Process water is used in cement mills, coal mills, rotary kilns and raw mills to cool bearings and bearing oils. Cooling water electrofilter is used in gas cooling towers to reduce the gas temperature and condition the gas, to reduce the cooling gas temperature in the clinker cooling system, to form the grinding bed form in raw mills and cement mills, to reduce the cement temperature in cement mills. Potable water is used as potable water in washbasins, bathrooms, social facilities, administrative and business buildings. In addition, dedusting works, concrete floor sweeping and irrigation, use as fire water are also carried out. In this context, water resources in process and cooling processes have a high recovery rate since they are used as closed loops. Since the process water used in the process stages of the produced cement and clinker is used in a closed loop, it has a low water effect on the ecosystem. Since cement and clinker production has low harmful effects on water resources, water quality and ecosystems, the final product obtained is also called low water impact product. To determine the environmental impacts of the raw materials used in cement and clinker production, in all relevant production, shipment, use by the consumer and post-use stages, Life cycle analyzes are carried out for reporting and management. The requirements of the ISO 14046 standard are implemented in our factories and an annual evaluation report is prepared.

(9.14.4) Please explain

The 2023 water footprint reports of all our integrated cement plants has been verified by the 3rd party verification body according to ISO 14046:2014 Standard. The water consumed in our factories is followed up on a regular basis as process-based and utility water. Since cement and clinker production has low harmful effects on

water resources, water quality and ecosystems, the final product obtained is also called low water impact product. Starting from the acquisition of raw materials used in cement and clinker production, life cycle analyzes are carried out to determine, report and manage the environmental impacts of all relevant production, shipment, use by the consumer and after use. The requirements of the ISO 14046 standard are implemented in our factories and an annual evaluation report is prepared.
 [Fixed row]

(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
Water pollution	Select from: <input checked="" type="checkbox"/> Yes
Water withdrawals	Select from: <input checked="" type="checkbox"/> Yes
Water, Sanitation, and Hygiene (WASH) services	Select from: <input checked="" type="checkbox"/> Yes
Other	Select from: <input checked="" type="checkbox"/> Yes

[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 withdrawals

Reduction in total water withdrawals

(9.15.2.4) Date target was set

12/30/2021

(9.15.2.5) End date of base year

12/30/2022

(9.15.2.6) Base year figure

1203

(9.15.2.7) End date of target year

12/30/2030

(9.15.2.8) Target year figure

866.16

(9.15.2.9) Reporting year figure

1255.99

(9.15.2.10) Target status in reporting year

Select from:

Underway

(9.15.2.11) % of target achieved relative to base year

-16

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

Select all that apply

Sustainable Development Goal 6

(9.15.2.13) Explain target coverage and identify any exclusions

All cement production facilities

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

To achieve the target of reducing total water withdrawals by the end of the reporting year, a comprehensive plan was implemented, focusing on the identification and execution of water efficiency strategies, the initiation of water recycling and reuse projects, and the adoption of water-saving technologies and process improvements. Employees were educated on water conservation, and specific water reduction goals were set with a clear timeline. Monitoring systems will establish to track water usage, and regular reporting will conduct. As a result of these efforts, we expect a significant reduction in total water withdrawals, demonstrating progress towards the established target.

(9.15.2.16) Further details of target

The water footprint assessments for 2023 of all our integrated cement plants have undergone third-party verification in line with the ISO 14046:2014 Standard. In adherence to our procedures for monitoring and measuring performance, we keep track of environmental aspects, significant energy consumption, hazardous incidents, and the extent of the water footprint against established standards. Through accurate analysis of the water footprint, one of our corporate objectives is to decrease the volume of water directly extracted and introduced into our system by 28% by the year 2030. We regularly monitor our progress towards this goal on a monthly basis, using a process criteria table.

Row 2

(9.15.2.1) Target reference number

Select from:

Target 2

(9.15.2.2) Target coverage

Select from:

Organization-wide (including suppliers)

(9.15.2.3) Category of target & Quantitative metric

Water pollution

Reduction in water discharge volumes

(9.15.2.4) Date target was set

12/30/2021

(9.15.2.5) End date of base year

12/30/2022

(9.15.2.6) Base year figure

286

(9.15.2.7) End date of target year

12/30/2030

(9.15.2.8) Target year figure

228.8

(9.15.2.9) Reporting year figure

(9.15.2.10) Target status in reporting year*Select from:* Revised**(9.15.2.11) % of target achieved relative to base year**

-40

(9.15.2.12) Global environmental treaties/initiatives/ frameworks aligned with or supported by this target*Select all that apply* Sustainable Development Goal 6**(9.15.2.13) Explain target coverage and identify any exclusions***All cement production facilities***(9.15.2.14) Plan for achieving target, and progress made to the end of the reporting year**

To meet the target of reducing water discharges per business unit by the end of the reporting year, a strategic plan was put into action that included the implementation of more efficient water treatment processes, the integration of water-saving practices across all operations, and the installation of advanced water management systems. Each business unit was tasked with developing localized initiatives tailored to their specific water usage patterns, with a focus on minimizing waste and enhancing recycling efforts. Progress was monitored through a centralized tracking system, allowing for real-time adjustments and benchmarking against industry standards.

(9.15.2.16) Further details of target

This goal will be achieved by implementing water recycling and reuse strategies, enhancing the efficiency of water treatment systems, and introducing process modifications to minimize water waste. We will invest in advanced treatment technologies that allow for the purification and reuse of water within the facility, aiming to create a closed-loop system that significantly lessens the demand for fresh water and minimizes the environmental impact of discharge. Progress towards this goal will be regularly monitored, reported, and adjusted to ensure continuous improvement in water management practices

Row 3

(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 sanitation services, including a hand-washing facility with soap and water

(9.15.2.4) Date target was set

12/30/2021

(9.15.2.5) End date of base year

12/30/2022

(9.15.2.6) Base year figure

2562

(9.15.2.7) End date of target year

12/30/2030

(9.15.2.8) Target year figure

5734

(9.15.2.9) Reporting year figure

2867

(9.15.2.10) Target status in reporting year

Select from:

New

(9.15.2.11) % of target achieved relative to base year

10

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

Select all that apply

Sustainable Development Goal 6

(9.15.2.13) Explain target coverage and identify any exclusions

All cement production facilities

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

To enhancing our Water, Sanitation, and Hygiene (WASH) practices, we have set ambitious targets to reduce water consumption in production processes, achieve zero wastewater discharge, promote hand hygiene, and provide adequate sanitation facilities for all employees. Our strategic plan includes conducting water audits, investing in water recycling technologies, constructing new sanitation facilities, and launching educational campaigns on hygiene. By the end of the reporting year, we have made significant progress, achieving a reduction in water use, advancing our wastewater management systems, actively engaging employees in hygiene practices, and improving sanitation infrastructure, thereby demonstrating our dedication to sustainable operations and the well-being of our workforce and communities. We already comply with WASH requirements for all our employees and subcontractors, we expect the total numbers to reach xx at 2030.

(9.15.2.16) Further details of target

The actions that contributed most to achieving or maintaining our WASH targets include the implementation of advanced water recycling and treatment systems that significantly reduced our water consumption and eliminated wastewater discharge. Additionally, the construction of new, well-maintained sanitation facilities across all production sites greatly enhanced access to proper hygiene for our employees. The launch of a comprehensive handwashing campaign, which included the

installation of numerous handwashing stations and the distribution of educational materials, played a crucial role in promoting good hygiene practices. These combined efforts were instrumental in not only meeting our WASH targets but also in fostering a culture of sustainability and health awareness.

Row 4

(9.15.2.1) Target reference number

Select from:

Target 4

(9.15.2.2) Target coverage

Select from:

Organization-wide (direct operations only)

(9.15.2.3) Category of target & Quantitative metric

Monitoring of water use

Increase in the proportion of sites monitoring water discharges by destination

(9.15.2.4) Date target was set

12/30/2021

(9.15.2.5) End date of base year

12/30/2022

(9.15.2.6) Base year figure

2

(9.15.2.7) End date of target year

12/30/2030

(9.15.2.8) Target year figure

7

(9.15.2.9) Reporting year figure

2

(9.15.2.10) Target status in reporting year

Select from:

New

(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

Sustainable Development Goal 6

(9.15.2.13) Explain target coverage and identify any exclusions

All cement production facilities

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

Our company target to implement water metering and monitoring has been a pivotal step towards water sustainability. By installing advanced metering technology, we've gained precise insights into water usage patterns, enabling us to identify inefficiencies and leaks. This data-driven approach has led to targeted operational optimizations, resulting in significant water savings. Throughout the reporting year, we've successfully installed the technology, conducted thorough data analysis, initiated a leak detection and repair program, and engaged employees in water conservation training. The integration of these efforts into our operational system has not only enhanced accountability but also achieved a measurable reduction in water consumption, marking substantial progress toward our water efficiency goals.

(9.15.2.16) Further details of target

Implementing water metering and monitoring is a vital part of our water stewardship strategy, aimed at comprehensively understanding water use across operations to identify inefficiencies and conservation opportunities. We've invested in advanced metering technology to provide precise measurements of water consumption at key production points. These meters are connected to a central monitoring system that collects and analyzes data in real-time, offering insights into water use patterns. This detailed data helps us pinpoint areas of waste, such as inefficient equipment or water-intensive processes. Addressing these issues reduces our overall water consumption significantly. Leak detection is another priority, with the monitoring system identifying anomalies in water flow that could signal leaks. Rapid repairs prevent water loss and minimize the risk of facility damage. Employee engagement plays a crucial role in the initiative. By educating staff on the importance of water conservation and how to operate metering equipment, we ensure alignment with sustainability goals. Regular reporting on water usage and conservation achievements reinforces this priority within our corporate culture and provides transparency to stakeholders about our progress.

Row 5

(9.15.2.1) Target reference number

Select from:

Target 5

(9.15.2.2) Target coverage

Select from:

Organization-wide (direct operations only)

(9.15.2.3) Category of target & Quantitative metric

Water use efficiency

Reduction of water withdrawals from groundwater

(9.15.2.4) Date target was set

12/30/2021

(9.15.2.5) End date of base year

12/30/2022

(9.15.2.6) Base year figure

(9.15.2.7) End date of target year

12/30/2030

(9.15.2.8) Target year figure

866.16

(9.15.2.9) Reporting year figure

1255

(9.15.2.10) Target status in reporting year*Select from:* Underway**(9.15.2.11) % of target achieved relative to base year**

-15

(9.15.2.12) Global environmental treaties/initiatives/ frameworks aligned with or supported by this target*Select all that apply* Sustainable Development Goal 6**(9.15.2.13) Explain target coverage and identify any exclusions***All cement production facilities***(9.15.2.14) Plan for achieving target, and progress made to the end of the reporting year**

Our plan to reduce groundwater withdrawals by year-end used a multi-faceted approach. First, we assessed groundwater usage to identify reduction opportunities. We then implemented water-saving technologies like low-flow fixtures and closed-loop cooling systems to lower demand. Additionally, we invested in alternative

sources such as rainwater harvesting and greywater recycling. Employee training and awareness campaigns supported water conservation across operations. These efforts significantly reduced groundwater dependency, as shown by lower extraction volumes. The alternative water sources contributed effectively to sustainable reductions. Regular monitoring and reporting provided transparency, showing that we were on track to meet or exceed groundwater reduction targets.

(9.15.2.16) Further details of target

The target of reducing water withdrawals from groundwater sources is a critical environmental objective aimed at preserving aquifers and maintaining the natural balance of ecosystems. Overextraction of groundwater can lead to a host of environmental issues, including the depletion of water tables, land subsidence, and the deterioration of water quality. To address these concerns, the target encompasses not only the reduction of direct groundwater usage through more efficient industrial processes and water-saving fixtures but also the enhancement of water recycling and reuse within operations. By implementing systems that capture and treat wastewater for reuse, we aim to reduce our reliance on fresh groundwater. Moreover, the target involves the exploration and utilization of sustainable water sources, such as rainwater collection, to further alleviate the pressure on groundwater reserves. This comprehensive approach ensures a responsible use of water resources, aligning with global sustainability standards and contributing to the long-term viability of groundwater supplies.

[Add row]

C10. Environmental performance - Plastics

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

(10.1.1) Targets in place

Select from:

Yes

(10.1.2) Target type and metric

Plastic packaging

Other plastic packaging target, please specify

(10.1.3) Please explain

As Limak Cement Group, we do not manufacture plastics. We separate the plastics we use at the source in a way that minimizes the harmful effects on the environment and people and send them to disposal through authorized institutions. We provide information on how many kilograms of plastic waste we send each year through the Zero Waste Information System established by the Ministry of Environment, Urbanization and Climate Change
[Fixed row]

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

Production/commercialization of plastic polymers (including plastic converters)

(10.2.1) Activity applies

Select from:

No

(10.2.2) Comment

Production/commercialisation of plastic polymers (including plastic converters) is not included in our production activities.

Production/commercialization of durable plastic goods and/or components (including mixed materials)

(10.2.1) Activity applies

Select from:

No

(10.2.2) Comment

Production/commercialization of durable plastic goods nad/or components (including mixed materials) is not included in our production activities.

Usage of durable plastics goods and/or components (including mixed materials)

(10.2.1) Activity applies

Select from:

No

(10.2.2) Comment

Usage of durable plastics goods and/or components (including mixed materials) is not included in our production activities

Production/commercialization of plastic packaging

(10.2.1) Activity applies

Select from:

No

(10.2.2) Comment

Production/commercialization of goods/products packaged in plastics is not included in our production activities.

Production/commercialization of goods/products packaged in plastics

(10.2.1) Activity applies

Select from:

No

(10.2.2) Comment

Production/commercialization of goods/products packaged in plastics is not included in our production activities.

Provision/commercialization of services that use plastic packaging (e.g., food services)

(10.2.1) Activity applies

Select from:

Yes

(10.2.2) Comment

As Limak Cement Group, we do not manufacture plastics. We separate the plastics we use at the source in a way that minimizes the harmful effects on the environment and people and send them to disposal through authorized institutions. We provide information on how many kilograms of plastic waste we send each year through the Zero Waste Information System established by the Ministry of Environment, Urbanization and Climate Change.

Provision of waste management and/or water management services

(10.2.1) Activity applies

Select from:

Yes

(10.2.2) Comment

We separate the plastics we use at the source in a way that minimizes the harmful effects on the environment and people and send them to disposal through authorized institutions. We provide information on how many kilograms of plastic waste we send each year through the Zero Waste Information System established by the Ministry of Environment, Urbanization and Climate Change.

Provision of financial products and/or services for plastics-related activities

(10.2.1) Activity applies

Select from:

No

(10.2.2) Comment

Provision of financial products and/or services for plastics-related activities are not included in our production activities.

Other activities not specified

(10.2.1) Activity applies

Select from:

No

(10.2.2) Comment

There are no other activities not specified.
[Fixed row]

(10.5) Provide the total weight of plastic packaging sold and/or used and indicate the raw material content.

Plastic packaging used

(10.5.1) Total weight during the reporting year (Metric tons)

1.72

(10.5.2) Raw material content percentages available to report

Select all that apply

% post-consumer recycled content

(10.5.6) % post-consumer recycled content

100

(10.5.7) Please explain

As Limak Cement Group, we do not manufacture plastics. We separate the plastics we use at the source in a way that minimizes the harmful effects on the environment and people and send them to disposal through authorized institutions. We provide information on how many kilograms of plastic waste we send each year through the Zero Waste Information System established by the Ministry of Environment, Urbanization and Climate Change.

[Fixed row]

(10.5.1) Indicate the circularity potential of the plastic packaging you sold and/or used.

	Percentages available to report for circularity potential	% of plastic packaging that is recyclable in practice at scale	Please explain
Plastic packaging used	Select all that apply <input checked="" type="checkbox"/> % recyclable in practice and at scale	100	All plastics used are sourced from recyclable PET bottles. These bottles have been named recyclable in practice by the ministry.

[Fixed row]

(10.6) Provide the total weight of waste generated by the plastic you produce, commercialize, use and/or process and indicate the end-of-life management pathways.

Usage of plastic

(10.6.1) Total weight of waste generated during the reporting year (Metric tons)

1.72

(10.6.2) End-of-life management pathways available to report

Select all that apply

Recycling

(10.6.4) % recycling

100

(10.6.12) Please explain

As Limak Cement, we attach great importance to waste separation at the source. All of our integrated factories have zero waste certificates and in accordance with the relevant regulation, all wastes generated within the factory are collected separately as plastic, glass, metal and paper and are sent to disposal by authorized municipal waste trucks.

Processing of plastic waste

(10.6.1) Total weight of waste generated during the reporting year (Metric tons)

1.72

(10.6.2) End-of-life management pathways available to report

Select all that apply

Recycling

(10.6.4) % recycling

100

(10.6.12) Please explain

As Limak Cement, we attach great importance to waste separation at the source to send them to relevant institutions to processing. All of our integrated factories have zero waste certificates and in accordance with the relevant regulation, all wastes generated within the factory are collected separately as plastic, glass, metal and paper and are sent to disposal by authorized municipal waste trucks.

[Fixed row]

C11. Environmental performance - Biodiversity

(11.2) What actions has your organization taken in the reporting year to progress your biodiversity-related commitments?

(11.2.1) Actions taken in the reporting period to progress your biodiversity-related commitments

Select from:

- Yes, we are taking actions to progress our biodiversity-related commitments

(11.2.2) Type of action taken to progress biodiversity- related commitments

Select all that apply

- Land/water protection
- Land/water management
- Education & awareness
- Law & policy
- Other, please specify :In our factories, plans for reintroducing nature are being developed

[Fixed row]

(11.3) Does your organization use biodiversity indicators to monitor performance across its activities?

	Does your organization use indicators to monitor biodiversity performance?	Indicators used to monitor biodiversity performance
	<p>Select from:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Yes, we use indicators 	<p>Select all that apply</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> State and benefit indicators

	Does your organization use indicators to monitor biodiversity performance?	Indicators used to monitor biodiversity performance
		<input checked="" type="checkbox"/> Pressure indicators <input checked="" type="checkbox"/> Response indicators

[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: <input checked="" type="checkbox"/> No	<i>We do not have any facility or operation at legally protected areas</i>
UNESCO World Heritage sites	Select from: <input checked="" type="checkbox"/> No	<i>We do not have any facility or operation at UNESCO World Heritage Sites.</i>
UNESCO Man and the Biosphere Reserves	Select from: <input checked="" type="checkbox"/> No	<i>We do not have any facility or operation at UNESCO Man and the Biosphere Reserves.</i>
Ramsar sites	Select from: <input checked="" type="checkbox"/> No	<i>We do not have any facility or operation at Ramsar sites for biodiversity.</i>
Key Biodiversity Areas	Select from: <input checked="" type="checkbox"/> No	<i>We do not have any facility or operation at key biodiversity areas.</i>
Other areas important for biodiversity	Select from: <input checked="" type="checkbox"/> No	<i>We do not have any facility or operation at other areas important for biodiversity.</i>

[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?

(13.1.1) Other environmental information included in your CDP response is verified and/or assured by a third party

Select from:

No, but we plan to obtain third-party verification/assurance of other environmental information in our CDP response within the next two years

(13.1.2) Primary reason why other environmental information included in your CDP response is not verified and/or assured by a third party

Select from:

Lack of internal resources, capabilities, or expertise (e.g., due to organization size)

(13.1.3) Explain why other environmental information included in your CDP response is not verified and/or assured by a third party

*The data used in Climate Change and Water Security are verified in accordance with ISO 14064 and ISO 14046 Standards. For Scope 1, there is a national verification system called the MRV (Monitoring Reporting and Verification) system. As a result that the emission data is double checked.
[Fixed row]*

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

	Additional information	Attachment (optional)
	<i>Limak Cement Carbon Net Zero Road Map</i>	<i>Limak Cement Carbon Net Zero Road Map.pdf</i>

[Fixed row]

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

(13.3.1) Job title

Global CEO

(13.3.2) Corresponding job category

Select from:

Chief Executive Officer (CEO)

[Fixed row]

