



KAMUYU AYDINLATMA PLATFORMU

ALARKO HOLDİNG A.Ş. Sustainability Compliance Report 2025 - Annual Notification

Summary

2025 Sustainability Compliance Report



**MERKEZİ KAYIT
İSTANBUL**
Türkiye Sermaye Piyasası - Merkezi
Saklama ve Veri Depolama Kuruluşu

Related Companies

Related Funds

	Company Compliance Status				Explanation	Report Information on Publicly Disclosed Information (Page number, menu name on the website)
	Yes	Partial	No	Not Applicable		
Sustainability Compliance Report						
A. GENERAL PRINCIPLES						
A1. Strategy, Policy and Goals						
A1.1. The prioritised environmental, social and corporate governance (ESG) issues, risks and opportunities have been determined by the Company's Board of Directors.	X				Within the company’s risk management strategy, the effective management of environmental, social and governance risks is considered a critical component, alongside financial risks such as market risk, credit risk, currency risk and liquidity risk.	alarko-holding-2024-sustainability-report_04112025.pdf page 61-63
A1.1. The ESG policies (Environmental Policy, Energy Policy, Human Rights and Employee Policy etc.) have been created and disclosed to the public by the Company's Board of Directors.	X				Policies have been arranged in compliance with Corporate Governance requirements. Additionally, a Responsible Communications Policy has been prepared. Other policies developed in the future will be shared publicly.	Alarko Corporate Website/Investor Relations/Corporate Governance/Policies
A1.2. The short and long-term targets set within the scope of ESG policies have been disclosed to the public.	X				Within the framework of the Holding’s overarching targets, subsidiary-specific subtargets are being established to further embed and reinforce the sustainability approach across the entire Group, ensuring ownership and enabling each company to develop actions aligned with its own dynamics.	alarko-holding-2024-sustainability-report_04112025.pdf page 93
A2. Implementation/Monitoring						
					Alarko has established an effective governance structure to manage sustainability and climate related risks and opportunities efficiently, integrate	

A2.1. The responsible committees and/or business units for the implementation of ESG policies and the senior officials related to ESG issues in the Company and their duties have been identified and disclosed to the public.	X			environmental, social and governance (ESG) parameters into its business model , ensure rapid compliance with relevant local and global regulations , and achieve high performance in sustainability indices.	alarko-şirketler-topluluğu_2025-suerdueruelebilirlik-yonetişim-yapısı.pdf
A2.1. The activities carried out within the scope of policies by the responsible committee and/or unit have been reported to the Board of Directors at least once a year.	X			The practices and actions are reported and shared on an annual basis within the scope of the report.	alarko-şirketler-topluluğu_2025-suerdueruelebilirlik-yonetişim-yapısı.pdf
A2.2. In line with the ESG targets, the implementation and action plans have been formed and disclosed to the public.	X			Within the framework of the Holding’s overarching targets, subsidiary specific sub targets are being established to further embed, broaden and internalise the sustainability approach across the entire Group, enabling each company to develop actions aligned with its own dynamics. In this context, Alarko Holding adopts as a core mission the achievement of holistic and coordinated progress throughout its sustainability impact journey.	alarko-holding-2024-sustainability-report_04112025.pdf page 93
A2.3. The Key ESG Performance Indicators (KPI) and the level of reaching these indicators have been disclosed to the public on yearly basis.		X		Due to improvements in data scope and quality in the calculations for 2024, the latest year's data has been shared.	alarko-holding-2024-sustainability-report_04112025.pdf page 156-164
A2.4. The activities for improving the sustainability performance of the business processes or products and services have been disclosed to the public.	X			Practices and actions are shared within the scope of the report on an annual basis.	alarko-holding-2024-sustainability-report_04112025.pdf page 78-79
A3. Reporting					
A3.1. The information about the sustainability performance, targets and actions have been given in annual reports of the Company an understandable, accurate and sufficient manner.	X				Alarko Corporate website/Investor Relations/Annual Report
A3.2. The information about activities which are related to the United Nations (UN) 2030 Sustainable Development Goals have been disclosed to the public.		X		In line with Alarko Holding’s sustainability strategy, the positive impact generated in 2024 and the areas in which contributions were made to the United Nations Sustainable Development Goals (SDGs) are detailed within the Value Creation Model.	alarko-holding-2024-sustainability-report_04112025.pdf page 92
A3.3. The lawsuits filed and/or concluded against the Company about ESG issues which are material in terms				There is no lawsuits filed in	

of ESG policies and/or will significantly affect the Company's activities, have been disclosed to the public.			X	the reporting period.	alarko-holding-2024-sustainability-report_04112025.pdf page 192
A4. Verification					
A4.1. The Company's Key ESG Performance metrics have been verified by an independent third party and publicly disclosed.		X		The entirety of the mandatory TSRS Report, as well as the indicators presented on pages 57, 97 and 163 of the GRI Aligned Sustainability Report, were subject to Limited Assurance and have been verified by independent third parties.	alarko-holding-2024-sustainability-report_04112025.pdf page 177-178
B. ENVIRONMENTAL PRINCIPLES					
B1. The policies and practices, action plans, environmental management systems (known by the ISO 14001 standard) and programs have been disclosed.	X			ISO 14001 certification has been taken.	Alarko Corporate Website/Investor Relations/Annual Report alarko-holding-2024-sustainability-report_04112025.pdf page 183-184
B2. The environmental reports prepared to provide information on environmental management have been disclosed to the public which is including the scope, reporting period, reporting date and limitations about the reporting conditions.	X			Placing the creation of sustainable value for all its stakeholders at the forefront, the Holding presents in this report the sustainability initiatives carried out across its energy, contracting, industry and trade , tourism, agriculture, land development and investment business groups, as well as its digital solutions. Unless otherwise stated, the report covers the operations conducted in Türkiye and abroad between 1 January and 31 December 2024, and does not include data related to other business areas or sectors.	alarko-holding-2024-sustainability-report_04112025.pdf page 4
B4. The environmental targets within the scope of performance incentive systems which included in the rewarding criteria have been disclosed to the public on the basis of stakeholders (such as members of the Board of Directors, managers and employees).	X			Across the Group, sustainability focused metrics carry a weighting of 5–10% within performance evaluations.	alarko-holding-2024-sustainability-report_04112025.pdf page 115
B5. How the prioritised environmental issues have been integrated into business objectives and strategies has been disclosed.	X			Across the Group, sustainability focused metrics carry a weighting of 5–10% within performance evaluations.	alarko-holding-2024-sustainability-report_04112025.pdf page 115
B7. The way of how environmental issues has been managed and integrated into business objectives and strategies throughout the Company's value chain, including the operational process, suppliers and customers has been disclosed.	X			Alarko Holding conducts its operations by periodically reviewing not only its direct activities but also the entirety of the value chain encompassing the broader Group.	alarko-holding-2024-sustainability-report_04112025.pdf page 57-60
B8. Whether the Company have been involved to environmental related organizations and	X			Memberships and signatories to organizations are included in the latest	alarko-holding-2024-sustainability-report_04112025.pdf page 179-180

non-governmental organizations' policy making processes and collaborations with these organizations has been disclosed.				sustainability report.	
B9. In the light of environmental indicators (Greenhouse gas emissions (Scope-1 (Direct), Scope-2 (Energy indirect), Scope-3 (Other indirect), air quality, energy management, water and wastewater management, waste management, biodiversity impacts)), information on environmental impacts is periodically disclosed to the public in a comparable manner.	X			Due to improvements in data scope and quality in the calculations for 2024, the latest year's data has been shared.	alarko-holding-2024-sustainability-report_04112025.pdf page 165
B10. Details of the standard, protocol, methodology, and baseline year used to collect and calculate data has been disclosed.	X			An emissions report covering the financial year from 1 January to 31 December 2024 has been prepared.	alarko-holding-2024-sustainability-report_04112025.pdf page 166-176
B11. The increase or decrease in Company's environmental indicators as of the reporting year has been comparatively disclosed with previous years.			X	Due to improvements in data scope and quality in the calculations for 2024, the latest year's data has been shared.	alarko-holding-2024-sustainability-report_04112025.pdf page 165
B12. The short and long-term targets for reducing the environmental impacts have been determined and the progress compared to previous years' targets has been disclosed.		X		Targets have been set. Practices have been shared.	alarko-holding-2024-sustainability-report_04112025.pdf page 93
B13. A strategy to combat the climate crisis has been created and the planned actions have been publicly disclosed.		X		This has been examined under the topic of Climate Change and Carbon Management.	alarko-holding-2024-sustainability-report_04112025.pdf page 97-98
B14. The programs/procedures to prevent or minimize the potential negative impact of products and/or services on the environment have been established and disclosed.		X		Targets have been set. Practices have been shared.	alarko-holding-2024-sustainability-report_04112025.pdf page 93
B14. The actions to reduce greenhouse gas emissions of third parties (suppliers, subcontractors, dealers, etc.) have been carried out and disclosed.			X	Work on the subject is ongoing .	
B15. The environmental benefits/gains and cost savings of initiatives/projects that aims reducing environmental impacts have been disclosed.	X			Practices have been shared.	alarko-holding-2024-sustainability-report_04112025.pdf page 94-109
B16. The data related to energy consumption (natural gas, diesel, gasoline, LPG, coal, electricity, heating, cooling, etc.) has been disclosed as Scope-1 and Scope-2.	X			The indicator has been comprehensively shared.	alarko-holding-2024-sustainability-report_04112025.pdf page 159-163
B17. The information related to production of electricity, heat, steam and cooling as of the reporting year has been disclosed.	X			The indicator has been comprehensively shared.	alarko-holding-2024-sustainability-report_04112025.pdf page 159-163
B18. The studies related to increase the use of renewable energy and transition to zero/low carbon electricity have been conducted and disclosed.	X			Practices have been shared.	alarko-holding-2024-sustainability-report_04112025.pdf page 94-109
B19. The renewable energy production and usage data has been publicly disclosed.	X			Practices have been shared.	alarko-holding-2024-sustainability-report_04112025.pdf page 94-109
B20. The Company conducted projects about energy efficiency and the amount of reduction on energy consumption and emission achieved through these projects have been disclosed.	X			Practices have been shared.	alarko-holding-2024-sustainability-report_04112025.pdf page 94-109
B21. The water consumption, the amount, procedures and sources of recycled and discharged water from underground or above ground (if any), have been disclosed.		X		Practices have been shared.	alarko-holding-2024-sustainability-report_04112025.pdf page 102
B22. The information related to whether Company's operations or activities are included in any carbon pricing system (Emissions Trading System, Cap & Trade or Carbon Tax).	X			Although the legal framework regarding carbon pricing in Türkiye has not yet been fully clarified, it is expected that carbon allowances will be priced in TL per tonne under the Emissions Trading System (ETS) planned to be established through EPIAŞ.	alarko-holding-2024-tsrs-compliant-sustainability-report-1.pdf page 21
B23. The information related to accumulated or purchased carbon credits within the reporting period has been disclosed.	X			Practices have been shared.	alarko-holding-2024-sustainability-report_04112025.pdf page 42 , 66

B24. If carbon pricing is applied within the Company, the details have been disclosed.			X		Work on the subject is ongoing .	
B25. The platforms where the Company discloses its environmental information have been disclosed.			X		Work on the subject is ongoing .	
C. SOCIAL PRINCIPLES						
C1. Human Rights and Employee Rights						
C1.1. The Institutional Human Rights and Employee Rights Policy has been established in the ligh of the Universal Declaration of Human Rights, ILO Conventions ratified by Turkey and other relevant legislation. The policy and the officals that responsible for the implementation of it have been determined and disclosed.	X				It has been included in the Human and Organizational Policy and Stakeholder Policy.	Alarko Corporate Website/Investor Relations/Corporate Governance
C1.2. Considering the effects of supply and value chain, fair workforce, improvement of labor standards, women's employment and inclusion issues (gender, race , religion, language, marital status, ethnic identity, sexual orientation, gender identity, family responsibilities, union activities, political opinion, disability, social and cultural differences, etc., such as non-discrimination) are included in its policy on employee rights.	X				It has been included in the Human and Organizational Policy and Stakeholder Policy.	Alarko Corporate Website/Investor Relations/Corporate Governance
C1.3. The measures taken for the minority rights/equality of opportunity or the ones who are sensitive about certain economic, environmental, social factors (low income groups, women, etc.) along the supply chain have been disclosed.	X				In order to amplify its collective positive impact together with the stakeholders within its sphere of influence, the Holding has identified its primary focus areas as ‘equal opportunities in education’, ‘ women’s empowerment in the economy’ and ‘social development’. Aiming to create long term and lasting impact through its social initiatives, the Holding shapes its social investments in line with the principles of sustainability, diversity, inclusion and strategic partnerships, and expands the reach of its projects through collaborations established with local stakeholders .	alarko-holding-2024-sustainability-report_04112025.pdf page 149-154
C1.4. The developments regarding preventive and corrective practices against discrimination, inequality, human rights violations, forced and child labor have been disclosed.	X				It has been included in the Code of Ethics and Working Principles.	Alarko Corporate Website/Investor Relations/Corporate Governance
C1.5. Investments in employees (education, development policies), compensation, fringe benefits, right to unionize, work/life balance solutions and talent management are included in the employee rights policy.		X			Ethical Behaviour Rules and Working Principles have been included. In the sustainability report, information has been provided regarding training durations and improvement programs.	Alarko Corporate Website/Investor Relations/Corporate Governance alarko-holding-2024-sustainability-report_04112025 .pdf page 111
	X				A knowledge portal has been provided to enable all employees to submit complaints,	Alarko Corporate Website / Career and Life

C1.5. The mechanism for employee complaints and resolution of disputes have been established and related solution processes have been determined.					feedback, and comments within the company. The intranet has been aligned with these issues.	
C1.5. The activities carried out within the reporting period which related to ensure employee satisfaction have been disclosed.	X				Satisfaction surveys are conducted every two years. Relevant data and studies are included in the report.	Alarko Corporate Website / Career and Life alarko-holding-2024-sustainability-report_04112025.pdf page 110-127
C1.6. The occupational health and safety policies have been established and disclosed.	X				The information has been presented to the public's attention.	alarko-holding-2024-sustainability-report_04112025.pdf page 128-130
C1.6. The measures taken for protecting health, preventing occupational accidents and related statistics have been disclosed.	X				The information has been presented to the public's attention.	alarko-holding-2024-sustainability-report_04112025.pdf page 128-130, 157
C1.7. The personal data protection and data security policies have been established and disclosed.	X				A Data Protection Policy has been established.	Alarko Corporate Website /About Us/GDPR
C1.8. The ethics policy have been established and disclosed.	X				Ethical Behavior Rules and Working Principles have been included.	Alarko Corporate Website /Investor Relations/Corporate Governance
C1.9. The studies related to social investment, social responsibility, finansal inclusivity and access to finance have been explained.	X				The activities carried out within the scope of social responsibility are presented to stakeholders' awareness every year.	alarko-holding-2024-sustainability-report_04112025.pdf page 149-154
C1.10. The informative meetings and training programs related to ESG policies and practices have been organized for employees.	X				Comprehensive training programmes are organised to enhance employees' knowledge and awareness of sustainability in line with the Group's sustainability strategy and approach.	alarko-holding-2024-sustainability-report_04112025.pdf page 118
C2. Stakeholders, International Standards and Initiatives						
C2.1. The customer satisfaction policy regarding the management and resolution of customer complaints has been prepared and disclosed.			X			
C2.2. The information about the communication with stakeholders (which stakeholder, subject and frequency) have been disclosed.	X				The information has been presented to the public's attention.	alarko-holding-2024-sustainability-report_04112025.pdf page 86-91
C2.3. The international reporting standards that adopted in reporting have been explained.	X				The information has been presented to the public's attention.	alarko-holding-2024-sustainability-report_04112025.pdf page 4
C2.4. The principles adopted regarding sustainability,the signatory or member international organizations, committees and principles have been disclosed.	X				The information has been presented to the public's attention.	alarko-holding-2024-sustainability-report_04112025.pdf page 179-180
C2.5. The improvements have been made and studies have been carried out in order to be included in the Borsa Istanbul sustainability indices and/or international index providers.	X				The information has been presented to the public's attention.	Data were submitted through the Borsa İstanbul Index data provider platform, and activities to broaden the scope of the index were carried out.
D. CORPORATE GOVERNANCE PRINCIPLES						
D1. The opinions of stakeholders have been sought in the determination of measures and strategies related to sustainability field.	X				The opinions and ideas of internal and external stakeholders have been solicited in prioritization analyses and incorporated into the strategic objectives.	alarko-holding-2024-sustainability-report_04112025.pdf page 83-86

D2. The social responsibility projects, awareness activities and trainings have been carried out to raise awareness about sustainability and its importance.	X			The information has been presented to the public's attention.	alarko-holding-2024-sustainability-report_04112025.pdf page 149-154
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