ÔZAKGYO

TSRS-Compliant Sustainability Report 2025



Reporting Period: January 1, 2025–December 31, 2025

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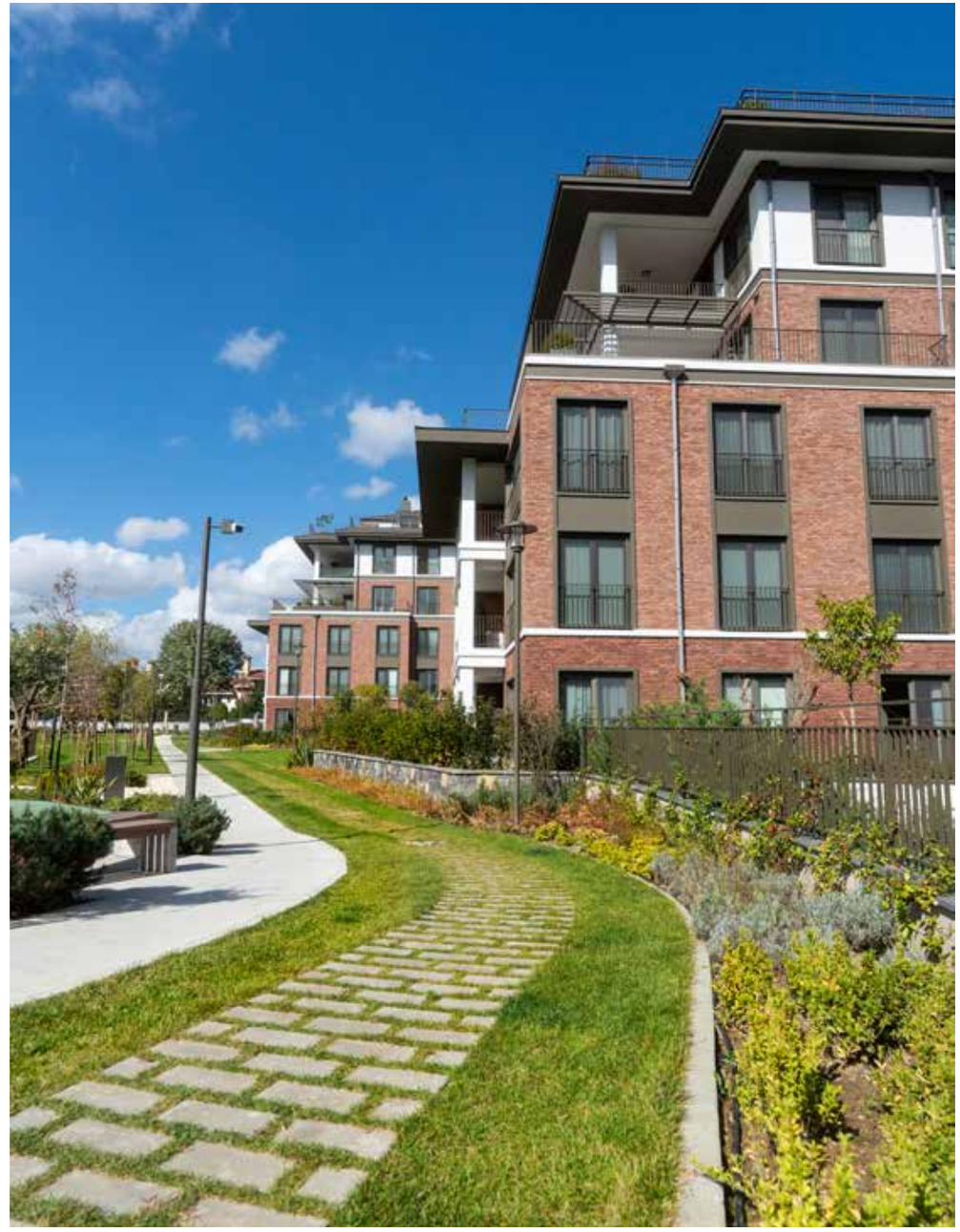
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1. INTRODUCTION

1.1. REPORTING PERIOD, SCOPE, AND BOUNDARIES

Reporting Period: January 1, 2025–December 31, 2025

Organizational boundary: Özak GYO A.Ş. and its subsidiaries and associates subject to full consolidation under the communiqués of the Capital Markets Board of Türkiye. The reporting boundary is the same as that used for the consolidated financial statements (TSRS 1, paragraph 20).

Operational Boundary - Real Estate Portfolio: A total gross leasable area of 272,357 m^2, comprising Büyükyalı Özak Office Building (Istanbul, Office), Büyükyalı Fişekhane (Istanbul, Commercial Space), Bulvar 216 (Ataşehir, Shopping Center and Office), İş İstanbul 34 Plaza (Bağcılar, Office), 34 Portall Plaza (Başakşehir, Commercial Space), Bayrampaşa Metro Gross Market (Istanbul, Commercial Space), and Ela Excellence Resort Hotel (Belek, Tourism).

Projects Completed and Available for Sale: Büyükyalı Istanbul (Istanbul, Residential), Özak Göktürk, and Özak Doa Göktürk (Istanbul, Residential).

Projects Under Construction and Available for Sale: Özak Duyu Göktürk (Istanbul, Residential), Özak Dragos (Istanbul, mixed-use), Hayat City Mahmutbey (Istanbul, mixed-use), and Hayat Flora (Istanbul, mixed-use).

Projects Under Development: Topkapı, Beşiktaş, Kemer Çamyuva, Antalya-Demre, Aydın-Didim, Bodrum-Akyarlar, and Kemer Hotel. These projects are included only within the scope of "strategic disclosure" and are not included in performance metrics.

Geographical Boundary: Türkiye (Marmara, Aegean, and Mediterranean regions). Because the Company has no assets outside Türkiye, no geographical disaggregation was required.

Financial Reference: Turkish Financial Reporting Standards (TFRS) – 2025 Consolidated Financial Statements. Inflation accounting was applied in accordance with TAS 29, and all financial figures are presented in terms of purchasing power as of December 31, 2025.



1.2. STANDARDS AND FRAMEWORKS APPLIED

Özak GYO A.Ş. declares that this report complies with all mandatory provisions of TSRS 1 and TSRS 2, issued by the Public Oversight, Accounting and Auditing Standards Authority (POA), and that its accuracy has been confirmed through limited assurance.

Framework/Standard	Level of Application	Description
TSRS 1-General Requirements	Full	All provisions of TSRS 1, paragraphs 27–53, have been applied. This is the second reporting year.
TSRS 2-Climate-related Disclosures	Full	The transitional relief for Scope 3 was applied (TSRS 1, Appendix E, paragraphs E5–E6). The Scope 3 methodology is being developed for the 2026 report.
GRI 2021	Reference table	Mandatory "General Disclosures" and topic-specific indicators. The GRI Content Index is presented in the Appendices.
TCFD	Full compliance	The governance, strategy, risk, and metrics structure is integrated with TSRS.
SASB-Real Estate/Hotels and Lodging	Selective	Energy-use, water-management, and biodiversity metrics. Both relevant volumes of KGK's sector guidance—Real Estate and Hotels and Lodging—have been applied.
CMB Sustainability Principles	"Comply or Explain"	All relevant principles are tagged in the report. The Capital Markets Board (CMB) Compliance Report was published on the Public Disclosure Platform (PDP).

1. INTRODUCTION

1.3. TRANSITIONAL RELIEF, MATERIALITY, AND ASSUMPTIONS

Second Reporting Year: This is Özak REIC's second report under TSRS. Most of the transitional relief applied in the first-year report for 2024 is no longer available. In particular, comparative information must be presented from this reporting period onward (TSRS 1, paragraph 70).

Scope 3 Emissions: Under TSRS 1, Appendix E, paragraphs E5–E6, Scope 3 greenhouse gas emissions were also excluded from measurement in the current period under the transitional relief. The Scope 3 calculation methodology is under development and will be presented for the 2026 reporting period.

Double Materiality: The matrix presented in Section 4 uses a financial threshold of at least 5% of net assets and an impact threshold based on a High or Very High impact score.

Data Consistency: All environmental data were calculated in accordance with EN ISO 14064-1 using a 5% materiality threshold; energy data comply with ISO 50001.

Currency and Inflation: Inflation accounting was applied in accordance with TAS 29, and all financial figures are presented in Turkish lira at the purchasing power prevailing at the end of the reporting period.

Fair Presentation: This report was prepared in accordance with the fair presentation principles set out in TSRS 1, paragraphs 11–16. The information presented is complete, neutral, and accurate.

Comparative Data Note: As this is the second reporting year, comparative information must be presented (TSRS 1, paragraph 70). The following corrections and updates were made to the 2024 comparative data: (i) The Scope 2 emission factor was updated from 0.442 to 0.469 tCO_2e/MWh based on EVÇED's 2025 publication, and the 2024 data were recalculated accordingly following this external-source update. (ii) Vehicle-fuel and refrigerant (F-gas) emissions were reported separately for the first time in 2025; these items had not been disaggregated for 2024. (iii) Although I-REC certificates covering 7,000 MWh were also purchased for Ela Excellence in 2024, market-based Scope 2 emissions were not calculated in the 2024 report. The 2025 report presents market-based Scope 2 data for both years (Appendix 7).

1.4. INDEPENDENT LIMITED ASSURANCE AND METHODOLOGY

Greenhouse gas emissions data for Scope 1 and Scope 2, together with energy, water, and waste data, were calculated in accordance with EN ISO 14064-1 using a 5% materiality threshold.

The materiality process was conducted through stakeholder surveys and executive workshops.

The data and methodology notes underlying the calculations are provided in the Appendices section.

1.5. STAKEHOLDER FEEDBACK CHANNELS

Channel	Detail	Frequency
Sustainability Email	sustainability@ozakgyo.com	Available Online at All Times
Online Survey (QR code)	QR code link at the end of the report	Annual
Investor Relations	yatirimci.iliskileri@ozakgyo.com	Continuous
Employee Portal	"Green Idea" module	Quarterly
Social Media	LinkedIn #ÖzakSustainability	Real Time
Ethics Reporting Hotline	SpeakHub anonymous reporting platform, available 24/7	Continuous

2. MESSAGES FROM OUR LEADERS



Ahmet Akbalık
Chairman

2.1. MESSAGE FROM THE CHAIRMAN

Esteemed Stakeholders,

In 2025, the real estate sector was among those industries clearly affected by global uncertainties, fluctuations in energy prices, and the tangible impacts of climate change. Amid this volatile environment, Özak REIC maintained its sustainable growth strategy with determination.

Our Company closed 2025 with TL 65.4 billion in net asset value, TL 36.5 billion in real estate portfolio value, and 272,357 m² of gross leasable area. By ensuring that our portfolio is strategically balanced across different segments, we have built a resilient business model capable of mitigating risks in the residential, office, retail, and tourism segments. We continue to generate a robust cash flow through income-generating commercial real estate assets, hotel operations, and ongoing projects.

We regard environmental, social, and governance performance as an integral element in our strategic objectives. With this report, we take our transparency a step further, fulfilling all the requirements outlined in the second-year implementation of the Turkish Sustainability Reporting Standards (TSRS 1 and TSRS 2). In 2025, we met 53.4% of the total electricity consumption in our portfolio with I-REC-certified renewable energy, reducing Ela Excellence Resort's electricity-related carbon footprint to zero.

Our climate strategy and targets:
Within the scope of our Net Zero Roadmap and in line with Science Based Targets (SBTi), we aim to reduce our Scope 1 and Scope 2 emissions by 42% by 2030 compared to the 2024 base year. We are committed to achieving a net-zero portfolio target by 2050.

We are also determined to expand the share of green building-certified assets in our portfolio; Bulvar 216's LEED Silver certification and Ela Excellence's Travelife Gold certification are concrete steps in this journey. By the end of 2028, we anticipate that 50% of our total gross leasable area will be LEED, BREEAM, or WELL certified.

Additionally, we have taken demonstrable actions in the areas of green loans and sustainable finance. With our Green Lease specification and full compliance with the CMB's "Comply or Explain" principles, we began preparations for a green loan in the first half of 2027.

An important affirmation of our circular economy approach was the Zero Waste certification (Basic Level) of the Büyükyalı project, in January. We continue to boost the recycling rate across our portfolio and expand our waste reduction targets.

Furthermore, we carry out significant efforts in the area of social contribution. We upheld child-friendly tourism practices by supporting UNICEF within Ela Excellence Resort Belek. In cooperation with the Republic of Türkiye Ministry of Culture and Tourism, we contributed to our country through earthquake donations totaling TL 80 million across 11 provinces.

Together with more than 1,000 employees, we continue to move toward a sustainable future.

In our strategic journey, we are confident, determined, and guided by the principles of transparent management, stakeholder engagement, and the circular economy. In the coming period, we will continue to implement projects that carry our Company beyond global standards.

Ahmet Akbalık
Chairman



2. MESSAGES FROM OUR LEADERS

2025 Achievement Summary

2025 Achievement Title	Summary Result	TSRS Reference
Scope 1 and Scope 2 Emissions	Second-year calculation and trend analysis based on comparative data.	TSRS 2, para. 29
Zero Waste Certificate	The Büyükyalı Istanbul project received the Basic Level Zero Waste Certificate (January 9, 2026).	TSRS 1, para. 51
Green Building Certification	Bulvar 216 received approval for LEED BD+C v4 certification in Q4 2025. The share of certified gross leasable area (GLA) across the portfolio increased.	TSRS 1, para. 33(c)
I-REC Certificate	I-REC certificates covering 9,684 MWh were purchased for Ela Excellence; as a result, 53.4% of the portfolio's electricity was sourced from renewable energy. Market-based Scope 2 emissions decreased by 53.5%.	TSRS 2, para. 29(b)
Social Value	TL 59.9 million in social investment and employment for 1,091 people.	TSRS 1, para. 34



3. CORPORATE PROFILE AND BUSINESS MODEL

3.1. ABOUT ÖZAK REIC

ÖZAK GAYRİMENKUL YATIRIM ORTAKLIĞI A.Ş.	
Date of Establishment	01.02.2008
Date of Transformation to REIC	03.06.2009
Issued Capital	TL 1,456,000,000
Registered Capital Ceiling	TL 2,000,000,000
Date Floated and Corrected Initial Share Price	15.02.2021/TL 0.53
Head Office	Istanbul
Trade Registry Office/Registration Number	Istanbul/654110
Tax Office/Tax ID Number	Zeytinburnu/662 077 5367
BIST Ticker Code	OZKGY
Headquarters Address	Kazlıçeşme Mah. Kennedy Cad. No: 52C/5 Büyükyalı, Zeytinburnu/Istanbul
Website	www.ozakgyo.com
Phone	+90 212 602 10 00
Email Address	info@ozakgyo.com/yatirimci.iliskileri@ozakgyo.com

Özak REIC is a real estate investment trust established in 2009 to bring all the real estate investments of Özak Global Holding under one roof. Özak Global Holding entered the construction industry in 1995 through İnt-Er Yapı. The Company has been listed on Borsa Istanbul under the ticker OZKGY since 2012.

Özak REIC conducts project development, investment, and asset management activities in the residential, office, retail, storage, and tourism segments. Guided by its vision of "adding value to life," the Company maintains a flexible portfolio structure that diversifies risk across projects in different segments.

3.2. SHAREHOLDING STRUCTURE (DECEMBER 31, 2025)

Name & Surname	Nominal Value (TL)	Share in Capital (%)
Ahmet Akbalık	687,504,314	47.22
Ürfi Akbalık	378,108,157	25.97
Free Float	364,000,000	25.00
Other	26,387,529	1.81
Total	**1,456,000,000**	**100.00**

3.3. FINANCIAL HIGHLIGHTS

Indicator (TL)	2024	2025	Δ (%)
Net Sales Revenue	TL 7.45 billion	TL 6.40 billion	-14.1
EBITDA	TL 2.58 billion	TL 339 million	-113
Net Profit/(Loss)	TL 2.26 billion	-TL 219.3 million	-109
Net Asset Value	TL 49.18 billion	TL 65.39 billion	33.1
Total Assets	TL 71.84 billion	TL 78.02 billion	8.6
Equity	TL 64.38 billion	TL 65.39 billion	1.6
Investment Property	TL 37.39 billion	TL 36.50 billion	-2.4
Energy Expense (within Sales)	TL 17.5 million	TL 68.3 million	290

Source: 2025 Consolidated Financial Statements and Independent Auditor's Report. Inflation accounting was applied in accordance with TAS 29.

3. CORPORATE PROFILE AND BUSINESS MODEL

3.4. REVENUE STRUCTURE AND PORTFOLIO DISTRIBUTION

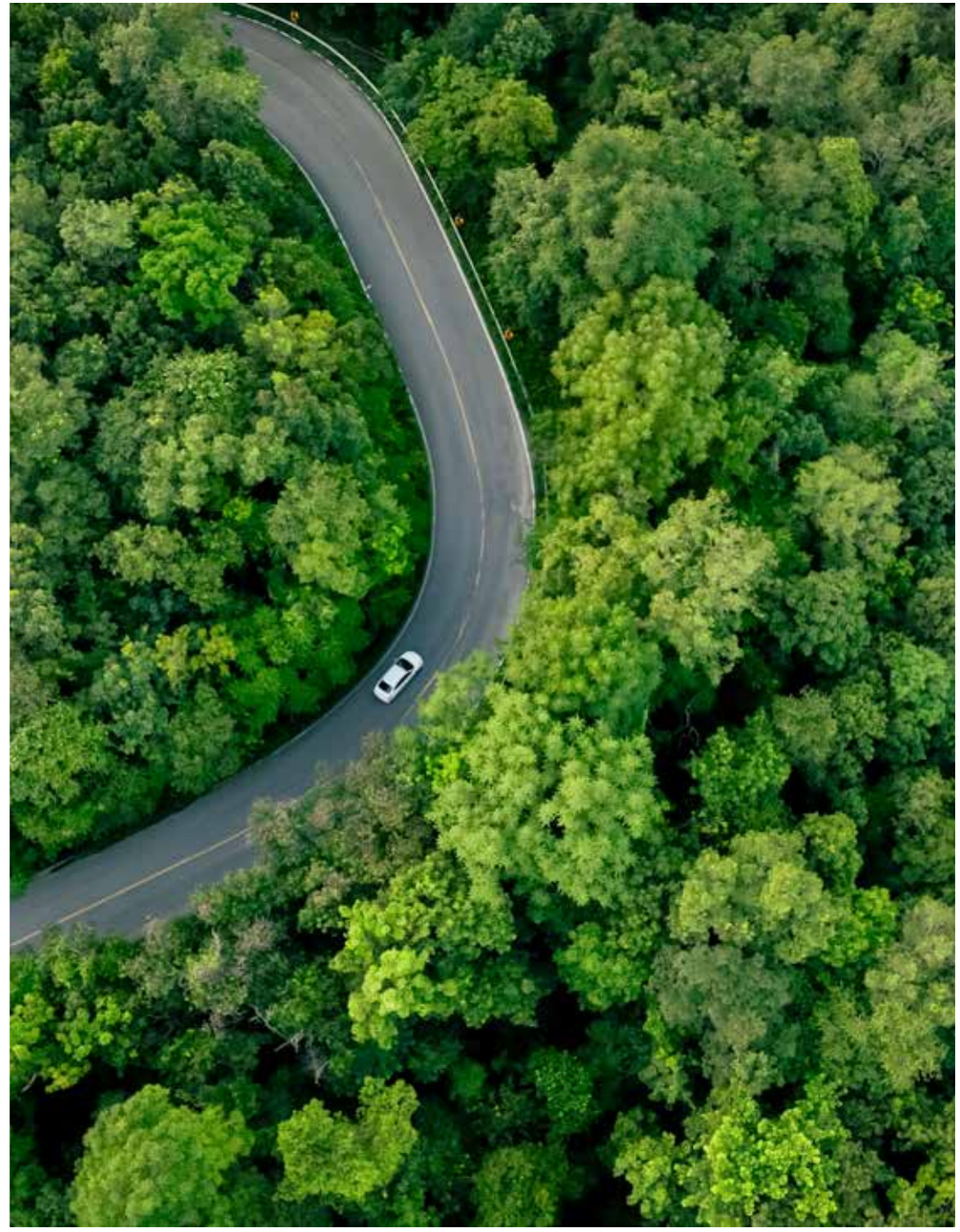
2025 Revenue Item	Amount (TL)	Share of Revenue (%)	TSRS Commentary
Residential and Office Sales	TL 2.63 billion	41.0	Construction cycle, demand for efficient buildings
Hotel Revenue	TL 2.54 billion	39.7	Energy, water, waste, and seasonality risks
Rental Income	TL 1.27 billion	19.8	Tenant demand, building performance
Other Income	TL 121.7 million	1.9	Ancillary services
Sales Discounts	-TL 155.9 million	-2.4	Commercial pricing

Özak REIC's revenue structure comprises three main segments: residential and office sales (41%), hotel operations (39.7%), and rental income (19.8%). This diversified revenue structure provides a natural hedge against varying economic conditions. The substantial combined share of rental and hotel income increases the impact of operational sustainability, energy efficiency, and climate change adaptation on portfolio value.

3.5. ASSOCIATES AND JOINT VENTURES

Company	Scope of Activities	Özak REIC's Share	Headquarters
Ela Hospitality Turizm ve Otelcilik A.Ş.	Tourism and hospitality operations	100%	Istanbul
Özak-Ziylan Ordinary Partnership	Büyükyalı project development	65.2%	Istanbul
Büyükyalı Otel İşletmeciliği A.Ş.	Tourism and hotel management	60%	Istanbul
Büyükyalı Tesis Yönetimi A.Ş.	Facility Management	63%	Istanbul

Source: 2025 Annual Report, pp. 54–57.



4. SUSTAINABILITY APPROACH

4.1. OUR SUSTAINABILITY JOURNEY

At Özak REIC, we view sustainability not only as an environmental responsibility but also as a strategic value-creation model that we shape together with our stakeholders. The materiality analysis and comprehensive stakeholder engagement process, which we initiated in 2024 and conducted for the second time in 2025, have enabled us to holistically assess both the environmental and social impacts of our operations and the effects of those impacts on our business's financial resilience.

We formulate our sustainability strategy using a four-step, evidence-based method:

- **Step 1-Topic Identification:** 29 candidate topics were identified by reviewing the GRI, TSRS, SASB Real Estate, and SASB Hotels and Lodging standards and the relevant industry guidance.
- **Step 2-Stakeholder Analysis:** Stakeholder groups were mapped, their levels of importance and impact were determined, and the expectations and concerns of all our stakeholders were collected through surveys, focus groups, and one-on-one interviews.
- **Step 3-Data Collection and Double Materiality:** Data collected through an online survey (N = 312; four focus groups) were evaluated at a "double materiality" workshop attended by interdisciplinary teams. Our prioritization matrix was then developed by scoring each topic's importance to stakeholders and its financial and strategic impact.
- **Step 4-Validation and Integration:** The matrix results were reviewed by the Risk Committee and the Corporate Governance Committee.

2025 Update

In 2025, our materiality process was updated and implemented for the second year. The 2024 baseline results were used as a reference, and the topic scores were revised in line with stakeholder feedback and industry developments. Unlike in 2024, the effects of the climate scenario results (SSP1-1.9 and SSP3-7.0) on the materiality scores were assessed in greater detail. The increase in energy costs across the portfolio was incorporated into the materiality assessment, and climate change was confirmed as the highest-priority topic.

Reference: TSRS 1, paragraphs 17–19 and B13–B37. Materiality Test: Information is material if omitting, misstating, or obscuring it could reasonably be expected to influence decisions made by the primary users of general-purpose financial reports.

4.2. STAKEHOLDER MAP

Özak REIC engages with a broad range of stakeholders in shaping its sustainability strategy. The table below summarizes the 2025 stakeholder engagement channels, their frequencies, and the key feedback received.

Stakeholder Group	Engagement Channel	2025 Engagement Frequency	Key Feedback
Investors & Analysts	Financial presentation, PDP, sustainability@ozakgyo.com	Four times a year	TCFD alignment, financial impact of net-zero targets
Tenants & Homeowners	Tenant portal, satisfaction survey	Twice a year	Lower energy bills, indoor air quality (IAQ), and comfort
Employees	"Green Idea" portal, ESG training	Continuous	Career development, diversity, and occupational health and safety
Contractors & Suppliers	ESG criteria in contracts, site audits	Once a year	Green material specifications, payment terms
Local Communities & NGOs	Focus group, social investment panel	Annual	Transparency in urban transformation, disaster resilience
Regulatory Bodies (Environment, CMB, BIST)	Official reporting, workshops	As needed	TSRS compliance, earthquake regulations, mandatory energy class requirement
Financial Institutions	Green loan due diligence	Project-based	Green loan criteria set

4. SUSTAINABILITY APPROACH

Stakeholder Feedback Examples (2025)

Investor (May 2025): "There is a net-zero target, but the interim targets are not quantitative. Publish a definitive timeline through 2027."

Tenant Survey (N = 146): 73% stated, "I would like transparent reporting on energy expenses." Additionally, 61% expect mobile-app access to indoor air quality sensor data.

Employee Focus Group: "A career and sustainability project award program would increase motivation, particularly among younger employees."

Local NGO Opinion: "In urban transformation, the balance between the historic fabric and green spaces must be preserved, and the process should be monitored through a publicly accessible platform."

4.3. MATERIALITY AND STAKEHOLDER ENGAGEMENT

At Özak REIC, we view sustainability not only as an environmental responsibility but also as a strategic value creation model that we shape together with our stakeholders.

The materiality analysis and comprehensive stakeholder engagement process, which we conducted for the second time in 2025, enabled us to holistically assess both the environmental and social impacts of our operations and the effects of those impacts on our business's financial resilience.

The feedback we received from a wide range of stakeholder groups, from our employees to our investors and from our tenants to local communities, revealed that topics such as climate risk and adaptation, digitalization, green financing, and water management are the highest priorities for our portfolio. At the same time, energy efficiency and occupational health and safety emerged as high-priority topics in terms of both their financial and strategic impacts. Stakeholders identified climate change, water management, and health and comfort as the highest-priority topics. It was also noteworthy that in stakeholder surveys, the concept of energy efficiency was often interpreted in conjunction with climate change risk.



Double Materiality Matrix

The table below presents the 14 material topics identified in 2024 and updated in 2025, along with their double materiality scores. The matrix was scored along two dimensions: stakeholder interest on the X-axis and financial and strategic impact on the Y-axis.

#	Material Topic	Stakeholder Interest (1-8)	Financial/ Strategic Impact (1-8)	Priority Level	Change from 2024
1	Climate Risk & Adaptation	8	8	HIGHEST	Unchanged—the highest-priority topic
2	Green Financing	7	8	HIGHEST	Unchanged—Green loan preparations ongoing
3	Digitalization & Data	7	8	HIGHEST	Unchanged—ESG Data Platform under development
4	Water Management	7	8	HIGHEST	Unchanged—Antalya remains a water-stressed region
5	Energy Efficiency	6	7	HIGH	Unchanged
6	Occupational Health & Safety	6	7	HIGH	Upward ↑-Impact of the Ela accident
7	Waste & Circular Economy	5	6	HIGH	Unchanged—Büyükyalı Zero Waste Certificate
8	Health and Comfort	5	6	HIGH	Unchanged—WELL/YÖN certification target
9	Supplier ESG Performance	4	5	MEDIUM	Unchanged
10	Biodiversity	3	4	MEDIUM	Unchanged—Kemer endemic species project ongoing
11	Community Investment	4	3	MEDIUM	Unchanged
12	Diversity & Inclusion	3	3	MEDIUM	Unchanged—Increase in the percentage of women managers
13	ESG-Compliant Suppliers	4	5	MEDIUM	Unchanged—EcoVadis pilot program ongoing
14	Community Investment	4	3	MEDIUM	Unchanged

Note: The scores above represent the 2025 update to the baseline scores presented in the 2024 report. Data from a stakeholder survey (N=312) and four focus groups were used.

4. SUSTAINABILITY APPROACH

Highest-Priority Topics

- **Climate Risk & Adaptation:** With 88% of the portfolio located in climate-sensitive areas, including the Istanbul coastline and the Mediterranean region of Antalya, this topic has the highest financial materiality score for physical and transition risks.
- **Green Financing:** A 2027 target has been established for green loans and sustainable financing. An increase in the share of green loans and funds could reduce financing costs by 30–45 basis points.
- **Digitalization & Data:** The Company aims to establish a Digital ESG Data Platform to monitor energy, water, and waste data in real time.
- **Water Management:** This is a critical priority because Ela Excellence accounts for 44% of the portfolio's total water consumption and the Antalya region has a High water-scarcity risk rating of 3/5 according to WRI.



4.4. SUSTAINABLE DEVELOPMENT GOALS (SDGs) ALIGNMENT

Özak REIC aims to make a tangible contribution to the global development agenda by aligning its sustainability strategy with the United Nations Sustainable Development Goals. The table below presents the SDGs with the strongest connection to our portfolio and operations, along with the associated material topics.

SDGs	Related Material Topics	Özak REIC Activities and Targets
	Water Management	Ela Excellence graywater recovery system and rainwater harvesting (14,000 m^3/year). Target to reduce portfolio-wide water intensity from 580 L/m^2 to 430 L/m^2 by 2030.
	Energy Efficiency, Climate Risk & Adaptation	Rooftop SPP investment at Ela Excellence and renewable energy certification through I-REC certificates. Target to reduce portfolio-wide energy intensity from 265 kWh/m^2 to 185 kWh/m^2 by 2030.
	Digitalization & Data, Green Financing	Ongoing installation of the BMS 4.0 IoT sensor network, development of the Digital ESG Data Platform, and green building certification initiatives (LEED, BREEAM, and WELL).
	Climate Risk & Adaptation, Health and Comfort	Büyükyalı urban regeneration project, restoration of the historic Fişekhane buildings, resilient building design, and a 100-year flood simulation.
	Waste & Circular Economy, Supplier ESG Performance	Büyükyalı Zero Waste Certificate, a portfolio-wide waste-recovery target of 50%, and an 11% circular-material rate (CAPEX).
	Climate Risk & Adaptation, Energy Efficiency	Target to reduce Scope 1 and Scope 2 emissions by 42% by 2030, aligned with SBTi. Climate scenario analysis using SSP1-1.9 and SSP3-7.0. Internal carbon-pricing study initiated.

4. SUSTAINABILITY APPROACH

4.5. DIFFERENCES FROM THE 2024 REPORT

As this is the second reporting year, the following changes were made compared with the 2024 Sustainability Report:

Topic	2024 Report (First Year)	2025 Report (Second Year)
Comparative Information	No requirement to present comparative information (TSRS 1, E3).	Comparative information is mandatory (TSRS 1, paragraph 70). The 2024 baseline data are presented.
Scope 3 Emissions	Transitional relief was applied (TSRS 1, E5).	The transitional relief continues to apply (TSRS 1, E6(b)). The Scope 3 methodology is under development.
Materiality Matrix	Created for the first time (N=312 survey, four focus groups).	Updated based on the 2024 scores. The OHS topic moved up in the ranking.
Climate Scenario Analysis	Initial analysis using the SSP1-1.9 and SSP3-7.0 scenarios	The scenario results were analyzed in greater detail, and the financial impact parameters were updated.
Emission Factor	EVÇED 2024: 0.442 tCO_2e/MWh	EVÇED 2025 (2024 reporting period): 0.469 tCO_2e/MWh
Fatal Accident	0 (zero)	1 (Ela Excellence) The incident involved an employee having a heart attack during working hours.
Zero Waste Certificate	Available at six of the nine facilities.	Büyükyalı was awarded a Basic Level Zero Waste Certificate on January 9, 2026.
Fugitive Emissions (F-gas)	Not reported separately.	140.5 metric tons (from air-conditioning and refrigeration units)

Source: Özak REIC Sustainability Report 2024 (published on October 31, 2025, and subject to a limited assurance engagement conducted by Yeditepe Independent Audit and Certified Public Accounting Inc.).



5. GOVERNANCE

This section explains how Özak REIC's management, control, and oversight mechanisms are structured from an environmental, social, and governance (ESG) perspective. The data are presented in accordance with the Annual Report 2025, the CMB Corporate Governance Communiqué, and TSRS requirements. During this second reporting period, the sustainability infrastructure established in 2024 was formally incorporated into the corporate governance framework.

5.1. BOARD OF DIRECTORS' OVERSIGHT OF SUSTAINABILITY

A. Oversight Body: Board of Directors (TSRS 1, paragraph 27(a)(i)—definition of the body, its duties, and its authority)

The Board of Directors of Özak REIC is the ultimate oversight body for sustainability-related risks and opportunities. As of December 31, 2025, the Board of Directors comprised six members. Sustainability matters were addressed within the duties and responsibilities of the Corporate Governance Committee, which reported directly to the Board of Directors.

Name & Surname	Position	Election/ Appointment Date	Term of Office	Independence Status	Gender
Ahmet Akbalık	Chairman	22.05.2025	1 year	-	Male
Ürfi Akbalık	Vice Chairman	22.05.2025	1 year	-	Male
Prof. Dr. Ali Alp	Board Member	22.05.2025	1 year	-	Male
Prof. Dr. Saim Kılıç	Board Member	22.05.2025	1 year	-	Male
Erman Kalkandelen	Board Member	22.05.2025	1 year	Independent	Male
Dr. Mine Berra Doğaner	Board Member	22.05.2025	1 year	Independent	Female

B. Board of Directors Indicators (December 31, 2025)

Indicator	Value
Number of Board Members	6
Percentage of Independent Board Members	33% (2/6)
Percentage of Women Board Members	17% (1/6)
Average Term of Office	4 years
Board Members Who Received ESG & Climate Training	100%
Number of Board Meetings (2025)	53
Number of Audit Committee Meetings	7
Number of Corporate Governance Committee Meetings	7
Number of Early Detection of Risk Committee Meetings	6

Source: 2025 Annual Report, pp. 58–65.

The Board of Directors has the following sustainability-related areas of expertise:

Area of Expertise	Number of Members
Climate Science/Net-Zero Finance	2 members
Real Estate Development	4 members
Risk & Audit	3 members
Digitalization & Cybersecurity	2 members

5. GOVERNANCE

C. Meeting Frequency and Information Flow

The Board of Directors met 53 times in 2025. In 2024, a discussion on climate scenarios was held during the integrated strategy and risk session. Starting in 2026, the Board of Directors will receive a quarterly sustainability progress report.

The sustainability information flow is structured across three tiers:

- **Tier 1—Operations:** Monthly energy- and resource-consumption data are reported to senior management.
- **Tier 2—Committee:** The quarterly ESG KPI dashboard is presented to the Corporate Governance Committee and the Remuneration Committee.
- **Tier 3—Board:** The Corporate Governance Committee manages the preparation of the Sustainability Report, which is presented to the General Assembly together with the limited assurance results.

D. Strategy, Risk Oversight, and Trade-offs

The Board of Directors oversees strategic decisions related to sustainability and the trade-offs involved in these decisions. The main sustainability matters on the Board of Directors' agenda in 2025 were approval of the net-zero roadmap, evaluation of the climate scenario analysis results, the application for the Büyükyalı Zero Waste Certificate, preparations for green loans and sustainable financing, and the OHS improvement program.

E. Remuneration and Sustainability Performance

Beginning in 2025, Özak REIC's remuneration system is being updated through 2030 to directly incorporate environmental, social, and governance (ESG) performance indicators into variable compensation calculations. Under the new structure, indicators for reductions in Scope 1 and Scope 2 emissions, energy intensity, the waste-recovery rate, diversity, and occupational health and safety will account for a percentage of the total bonus pool to be determined. Achievement of the targets will be verified annually through an independent limited assurance engagement.

Management Level	Variable Compensation/ Bonus Weight	Share of ESG/ Carbon Metrics	Criteria
CEO & C-Level	50%	25%	Percentage reduction in Scope 1 and Scope 2 emissions; green loans
Directors	30%	20%	Energy intensity, waste recovery rate
Facility Managers	20%	30%	Building-level kWh/m² target

Note: Sample sustainability KPIs and bonus scenarios. The system is scheduled to become operational in 2026.

5.2. MANAGEMENT'S ROLE

A. Delegation of Responsibilities and Accountability Structure

Sustainability management is carried out by the following management positions under the coordination of the Corporate Governance Committee:

Position	ESG Responsibility	Reporting Line	Period
CEO	Net-zero strategy and approval of sustainable financing	Board of Directors	3 months
CFO	Green loan, ESG data integrity	CEO	3 months
Secretary to the Board of Directors	Committee schedule, documentation	Chairman	Continuous

5. GOVERNANCE

B. Controls and Procedures

The accuracy and integrity of sustainability data are ensured through the following internal control mechanisms:

- **Data Collection:** Energy, water, waste, and OHS data are collected monthly at the facility level using ISO 14064-1-compliant control checklists.
- **Verification:** All environmental data are calculated in accordance with EN ISO 14064-1 using a 5% materiality threshold; energy data comply with ISO 50001.
- **Reporting:** A quarterly ESG KPI dashboard is presented to the Corporate Governance Committee, and the annual Sustainability Report is subject to an independent limited assurance engagement.
- **Internal Audit:** The Audit Committee reviews the consistency of the financial statements with the environmental data.

5.3. COMMITTEE STRUCTURE AND SUSTAINABILITY INTEGRATION

Three committees operate under the Board of Directors of Özak REIC. Sustainability matters fall under the purview of the Corporate Governance Committee. In addition, the Sustainability Subcommittee, established in 2024, planned the formal designation of the sustainability organization with Board approval before the second reporting period.

Committee	Members	Sustainability Role	Number of Meetings in 2025
Audit Committee	Dr. Mine Berra Doğaner (Chair, Independent) Erman Kalkandelen (Member, Independent)	Consistency of financial statements with environmental data; review of physical and transition climate risks	7
Corporate Governance Committee	Dr. Mine Berra Doğaner (Chair, Independent) Prof. Dr. Ali Alp (Non-Executive) Pınar Kaya* (Investor Relations Manager)	Responsible for sustainability, monitoring compliance with TSRS and CMB "Comply or Explain" requirements, and reviewing the Sustainability Compliance Report.	7
Early Detection of Risk Committee	Dr. Mine Berra Doğaner (Chair, Independent) Erman Kalkandelen (Independent)	Climate change risks are identified and updated annually by the Early Detection of Risk Committee.	6

**Pınar Kaya assumed her position on June 10, 2025.*

Sustainability Subcommittee

In 2024, to facilitate Özak REIC's first TSRS reporting, a sustainability subcommittee was established with support from selected departments within the organization. After evaluating the effectiveness of the process, it was planned to formally appoint the sustainability organization with the approval of the Board of Directors before the second reporting period.

Chair: Dr. Mine Berra Doğaner (Independent Board Member)
Responsibilities: Reviewing the net-zero roadmap and monitoring progress against ESG KPIs.

5.4. ETHICAL COMPLIANCE, DATA SECURITY, AND ANTI-CORRUPTION

Özak REIC's "Ethics, Compliance, and Data Security" section outlines the fundamental principles that shape the Company's way of doing business. The Code of Ethical Conduct, which came into effect in 2019, and the Anti-Corruption Procedure, updated in 2020, clearly define the obligations of all employees and suppliers regarding bribery, conflicts of interest, and gift policies. Potential violations are reported directly to the Audit Committee through SpeakHub, an anonymous reporting hotline available 24/7.

Policy/System	Effective Date	Scope	Oversight
Code of Ethical Conduct	2019	All employees & suppliers	Internal Audit/Hotline
Anti-Corruption Procedure	2020	Gifts, donations, public officials	Audit Committee of the Board of Directors
PDPL Compliance Program	2021	Customer & tenant data	PDPL
Information Security Management System	2022	Operational & financial data	Penetration testing
Sustainable Supplier Principles	2024	Environment, human rights, and greenhouse gas emissions	Corporate Governance Committee; audits to be conducted beginning in 2025

5. GOVERNANCE

2025 Ethics Indicators

Indicator	2023	2024	2025
Number of Meetings (annual)	28	50	53
Number of Ethics Reports Received	0	0	20
Confirmed Violations	0	0	18 investigations, 11 of which were closed
Corruption Cases/Fines (TL)	0	0	0
Information Security Breaches	0	0	0

Source: SpeakHub anonymous reporting platform, Internal Audit report, and ISO 27001 logs.
A SOC-2 audit is planned to be added in 2025.

5.5. AREAS FOR IMPROVEMENT

Actions planned for the 2026 period to strengthen the governance structure:

- Increase the percentages of independent members and women members: Establish a candidate pool for the Nomination and Corporate Governance Committee.
- Board Climate Competency Program: Training on updates to TCFD and IFRS S1 and S2.
- Revise sustainability management and add "biodiversity oversight" to the sustainability program.
- ESG Data Platform: Consolidated financial and ESG reporting through IoT–ERP integration.
- Integrate the ESG-performance-linked bonus pool into the HR remuneration policy so that it becomes operational in 2026.



6. STRATEGY

This section presents the risks and opportunities Özak REIC faces in relation to climate change and sustainability, their potential financial effects on company value, and the roadmap toward its 2030–2050 vision. As this is the second reporting year, the strategic framework from the 2024 report was retained, and comparative information is presented.

6.1. SHORT-, MEDIUM-, AND LONG-TERM RISKS AND OPPORTUNITIES

Time horizons defined for Özak REIC: Short Term (0–3 years), Medium Term (3–10 years), and Long Term (more than 10 years). These definitions are the same as in the 2024 report and are aligned with the Company's investment and development cycle.

Topic	Type	Risk/Opportunity Category	Time Horizon	Financial Impact (annual, TL million)
Carbon price increase	Risk	Transition-Regulatory	Short to Medium Term	[-TL 30 million] (carbon purchases) (initially for 20% of total emissions)
Green lease premium	Opportunity	Market-Demand	Short Term	[+TL 2 million] (EBITDA)
Flood/storm surge	Risk	Physical-Acute	Medium to Long Term	[-TL 100 million] (damage and business interruption)
Renewable energy CAPEX incentives	Opportunity	Transition-Financial	Short Term	+ 2% (CAPEX subsidy)
Insurance premium increase	Risk	Physical-Chronic	Medium Term	[-TL 9 million] (annual premium)
Circular material gains	Opportunity	Market-Cost	Short to Medium Term	[+TL 50 million] (material savings)
Reputation & access to capital	Opportunity	Transition-Reputational/Financial	Continuous	30–45 basis-point reduction in financing costs
Water scarcity	Risk	Physical-Chronic	Medium Term	[-TL 10 million] (operations + CAPEX) replacement of 20,000 m^3/year of water by tanker truck deliveries
Green supply chain	Opportunity	Transition-Market	Medium	[+TL 50 million] (tenant demand and collaboration); projected 3% increase in net profitability
Energy price volatility	Risk	Transition-Market	Short to Medium Term	[Increase in operating expenses] (2025: TL 68.3 million vs. TL 17.5 million in 2024; +290%)
Occupational accident risk (tourism)	Risk	Social-Operational	Short Term	[Compensation and reputational damage]

Note: Financial impacts are consistent with the baseline scenarios in the 2024 report. In 2025, energy price volatility and occupational accident risk were added as new items. Impact amounts are management estimates and are not finalized.



Impact Direction	Related SDGs	Change from 2024	Action Taken/Planned
Cost ↑	7, 13	Unchanged	Internal carbon price (EUR 50/tCO_2e), energy-efficiency retrofits
Revenue ↑	11, 12	Unchanged	LEED/WELL certification, tenant ESG dashboard
Cost ↑	11, 13	Unchanged	Barriers, pumping systems, and parametric insurance
Cash ↑	7, 9	Unchanged	YEKA/SPP investments, green loans
Cost ↑	13	Unchanged	Adaptation investments, geographical diversification of the portfolio
Cost ↓	12	Unchanged	Recovery and procurement of second-life materials
Financing ↓	9, 13	Unchanged	Green loans and sustainable financing, SBTi validation
Cost ↑	6	Unchanged	Graywater reuse, rainwater harvesting, and water-efficient fixtures
Revenue ↑	8, 12	Unchanged	Supplier ESG score ≥ 70, joint R&D
Cost ↑	7	New—Added based on 2025 data	SPP investment, I-REC certificates, and long-term power purchase agreements
Cost ↑	8	New—Occupational accident in 2025	Strengthening the OHS management system at Ela (ISO 45001) and conducting a root-cause analysis

6. STRATEGY

6.2. STRATEGIC PRIORITIES AND ROADMAP

We present five key priorities derived from our double materiality analysis and climate scenario studies—the net-zero emissions pathway, the share of certified green buildings, the share of renewable electricity, circular waste management, and water efficiency—together with milestones for 2025, 2030, and 2050.

Priority	2026 Target	2030 Target	KPI	Linked SDGs	Progress since 2024
Net Zero Portfolio	20% reduction in Scope 1 and Scope 2 emissions (2024 baseline)	42% reduction	$kgCO_2e/m^2$ GLA	7, 13	Baseline established in the first year; 2025 represents the second year of calculation
50% Certified GLA	25% of GLA certified under LEED, WELL, or BREEAM	50%	GLA ratio	9, 11	Bulvar 216 received LEED certification approval in Q4 2025
Renewable Electricity	Increase the share of renewable energy	≥70%	MWh/Total	7, 12	53.4% (9,684 MWh covered by I-REC certificates/18,126 MWh total)
Waste Recovery	50% at construction sites and across the portfolio	≥90%	Metric tons recovered/ total waste	12	Büyükyalı Zero Waste Certificate (01/2026)
Water Reuse	20% graywater recovery	≥50%	m^3 reused/ total m^3	6	Ela graywater system operational

Planned Milestones

- 2026: Commissioning of smart infrastructure with wastewater GIS integration (Ataşehir/ Bulvar 216).
- 2027: Net-zero pilot and BREEAM Outstanding certification
- 2027–2030: Portfolio-wide internal carbon pricing, SPP investments, and Renewable Energy Resource Area (YEKA) agreements.
- 2030: A 46% reduction in total absolute emissions by 2030 to align with the net-zero pathway (aligned with the SBTi 1.5°C pathway).

6.3. BUSINESS MODEL AND VALUE CHAIN IMPACTS

Özak REIC's business model encompasses real estate investment, project development, management of leasable space, and hotel operations. This business model is affected by climate change both on the asset side, through physical climate risks and sensitivity in asset valuations, and on the operational side, through energy and water costs, tenant expectations, and guest preferences.

Climate Impacts Across Value Chain Stages

Value Chain Stage	Climate Risk/Opportunity	Current Impact	Strategic Response
Land Development (Upstream)	EIA, zoning, and TSRS preliminary impact analyses	Land plots in Kemer, Demre, and Bodrum are in physical risk zones	Integration of a climate-risk score into feasibility studies
Design & Construction (Upstream)	Design-build, BIM, and LCA processes integrated with LEED/WELL requirements	Increase in construction material costs	Circular material ratio target of 15% (CAPEX)
Asset Management (Operations)	Energy efficiency, digital BMS, revenue-sharing leases	Energy expense 2025: TL 68.3 million (+290%)	BMS 4.0 IoT sensor scope, ISO 50001
Tenant & Guest (Downstream)	Tenant ESG expectations, demand for certified buildings	Tenant survey: 73% demand for energy transparency	Preparations to use green loans and preliminary research on green leases.
Disposal/Sale (Downstream)	Target of achieving a 3% ESG-related sales premium	A sales-price premium is observed for certified buildings	Increasing the share of ESG-certified properties in the portfolio

6. STRATEGY

6.4. IMPACTS ON FINANCIAL POSITION, FINANCIAL PERFORMANCE, AND CASH FLOWS

A. Current Period Impacts (2025)

The primary impacts of sustainability-related risks reflected in the financial statements for 2025 are summarized below:

Impact Area	Financial Statement Line Item	2025 Impact	Description
Increase in energy costs	Cost of sales	TL 68.3 million (2024: TL 17.5 million; +290%)	Increases in natural gas and electricity prices and energy-intensive operations at hotel and commercial properties.
Investment property valuation	Investment properties	TL 36.50 billion (2024: TL 37.39 billion; -2.4%)	Climate risk is not yet explicitly priced into valuation assumptions.
Insurance expenses	Operating expenses	[Increase expected—data being consolidated]	Physical-risk premiums for coastal properties in Istanbul and properties in Antalya.
Sustainability CAPEX	Property, plant, and equipment	[Not disaggregated—included in total CAPEX]	Solar Power Plant (SPP) and BMS investments are not yet tracked as separate line items.
Net loss	Net profit/loss for the period	-TL 219.3 million (2024: +TL 2.26 billion)	Valuation losses, inflation accounting; no specific reference to sustainability.

B. Expected Impacts in the Short, Medium, and Long Term

Time Horizon	Impact on Financial Position	Impact on Financial Performance	Impact on Cash Flow
Short Term (0–3 years)	Increase in CAPEX for SPP investments (+2%) and the cost of the I-REC certificate	Initial savings in energy expenses; limited impact from green lease premiums	Impact of energy savings on operating cash flow
Medium Term (3–10 years)	Increase in the share of LEED/BREEAM-certified assets, resulting in higher asset valuations; adaptation CAPEX for barriers and pumping systems	Carbon-pricing cost (2030: EUR 100/tCO_2e) and increased revenue from green lease premiums	Lower-cost financing through green loans and increased operating cash flow from energy savings
Long Term (10+ years)	Reduction in the physical-risk discount applied to portfolio value and an increase in the value of the net-zero portfolio	Higher carbon costs offset by energy and material savings	Limiting insurance premium increases through adaptation investments

C. Quantification Constraints

The quantification of certain sustainability-related financial impacts could not be completed as of the reporting date for the following reasons:

- The climate-related portion of the increase in insurance expenses could not be disaggregated from the consolidated financial statements (paragraph 40(a)).
- Sustainability CAPEX is not yet tracked as a separate line item within total CAPEX (paragraph 40(a)).
- The portion of the increase in energy expenses attributable to climate change could not be separated from the portion attributable to market conditions (paragraph 40(b)).

6.5. CLIMATE RESILIENCE AND SCENARIO ANALYSIS

Our climate scenario study is based on a "dual-track" approach that tests both transition and physical risks, in line with TSRS 2 requirements. The analysis, first conducted for the 2024 report, was updated for the 2025 period, and its financial impact parameters were revised.

The constraints described above were addressed through qualitative disclosures provided under paragraph 40 of TSRS 1. Quantitative disclosures will be expanded in future reporting periods as the Company improves its capacity to disaggregate data.

6. STRATEGY

Scenarios Used

Scenario	Description	Source
<2°C Net-Zero (SSP1-1.9)	Aligned with the Paris Agreement, with the rise in temperature limited to between 1.5°C and 2°C by 2050. A world in which emissions decline rapidly.	IEA NZE 2050/IPCC RCP 2.6
1.5°C Alignment/ Rapid Transition	A world in which the EU Green Deal and the Türkiye Carbon Exchange become operational in 2026 and global warming is limited to 1.5°C.	IEA NZE-2050, TÜBİTAK
3°C Business-as-Usual (SSP3-7.0)	Low transition risk/high physical risk. Carbon prices remain low, while physical risks, including flooding, heat waves, and sea-level rise, intensify.	IPCC SSP5-8.5/RCP 8.5

Scenario Assumptions

Parameter	2030	2040	2050	Source/Basis
Carbon price (EUR/tCO_2e, ETS-TR)	100	180	250	IEA NZE 2050 roadmap, TÜBİTAK synchronization
Renewable electricity cost (EUR/MWh)	45	35	28	IRENA "1.5°C Pathway"
Green loan/fund spread advantage (bp)	-45	-60	-65	BloombergNEF Green-vs.-Gray Index
Insurance premium increase (annual, %)	+3	+2	+2	Swiss Re Net-Zero Risk Trend
Tenant green lease premium (%)	+3	+4	+5	CBRE Global Green Premium

Analysis Scope

Time Horizons: Medium Term (2030–2050) and Long Term (2050–2100).

Scope: 14 existing assets in the portfolio and three development projects. The methodology combined operational data, market projections, and local CORDEX climate models; water stress, energy prices, and carbon pricing were selected as the primary variables.

Scenario Outputs and Financial Resilience

Indicator	<2°C Net-Zero (SBTi 1.5°C)	1.5°C Alignment (Rapid Transition)	3°C Business-as-Usual (High Physical Risk)	Explanation/Assumption
2030 carbon price (EUR/tCO_2e)	100	120	40	IEA NZE-2050/IPCC SSP1-2.6/SSP5-8.5
Annual CAPEX (TL million)	270	190	80 (adaptation)	Renewable Energy ≥ 30 MWp/retrofit/adaptation
Difference in NAV from the Reference Scenario (TL million)	420	260	-180	8% discount rate, 2024–2050
Internal IRR (CAPEX package)	13%	11%	-	-
Payback period (years)	72	84	>15	-
Average Annual OPEX Savings (TL million)	48	31	6	Energy and carbon costs
Physical VaR/NAV in 2050	4%	7%	23%	IPCC atlas layers
Cumulative emissions reduction by 2030 (tCO_2e)	~26,500	~33,000	~2,000	Scope 1 and Scope 2 comparison
Emissions intensity in 2030 ($kgCO_2e/m^2$)	0.09 (-42%)	0.12 (-25%)	0.16 (←)	2024 baseline ≈ 0.16 (to be calculated after restatement)
Green GLA in the Portfolio by 2030 (%)	60	48	32	Certified under LEED, BREEAM, or WELL

Note: The values above are based on the assumptions in the 2024 report.

6.6. NEXT STEPS

1. **Scope 3 Roadmap:** Methodology for material-related carbon & tenant emissions (ISO 14064-1). To be presented in the 2026 report.
2. **Internal Carbon-Pricing Study:** The use of a shadow carbon price of EUR 50/tCO_2e in project feasibility studies began in Q3 2025.
3. **Wastewater Reuse System:** Graywater and rainwater facilities at Bulvar 216 in Ataşehir (Q4 2026).
4. **Green Loans and Sustainable Finance:** Begin the feasibility study and prepare the application for a green loan in 2026.
5. **Digital ESG Data Platform:** An IoT–ERP-integrated platform for monitoring energy, water, and waste data in real time (infrastructure installation and pilot implementation in 2026).

7. RISK MANAGEMENT

This section explains how Özak REIC identifies, assesses, prioritizes, and monitors sustainability- and climate-related risks and integrates them into its overall corporate risk management framework. As this is the second reporting year, the risk framework established in 2024 was retained and updated to reflect developments during the period, including the increase in energy prices and the death of an employee following a heart attack at the Company's Ela facility.

7.1. CORPORATE RISK MANAGEMENT FRAMEWORK

Standards and Governance Structure

Özak REIC's risk management framework is based on the Corporate Governance Principles of the Capital Markets Board of Türkiye (CMB). The governance structure operates as follows:

a. Board of Directors: Ultimate responsibility for overseeing all risks and approving the annual "Risk Appetite Statement." In 2025, 34 meetings were held.

b. Early Detection of Risk Committee (EDRC): Meets periodically; beginning in 2026, climate-related risks will be considered as a separate agenda item.

c. Risk Management: The Corporate Risk Inventory (CRI) is updated using the COSO matrix. The 48 gross risks are converted into net risk scores that incorporate their financial impacts.

d. Sustainability Management: The Corporate Governance Committee integrates environmental and social risk data into the CRI and conducts a TSRS 2 compliance review. Risk Appetite (2025): Financial loss limit ≈ 5% of NAV; reputational damage in a "medium-high" scenario < 90 days.

Risk Identification and Prioritization Process

In the process based on the CMB Corporate Governance Principles, findings from market trend scanning, climate data analytics, field inspections, and stakeholder surveys are reviewed every six months by the Early Detection of Risk Committee. The 48 gross risks are scored using a severity x likelihood + time horizon matrix and converted into net risk scores that incorporate their financial impacts. The top 15 risks are reported through the management dashboard, and the top seven are reported directly to the Board of Directors.



Risk Inventory

Risk Title	Brief Description	Change from 2024
Physical Climate Risk (Flood/ Inundation)	Operational downtime, damage, and increased insurance deductibles at coastal and riverside assets due to heavy rainfall and sea-level rise	Unchanged
Legal and Regulatory Risks—Carbon Cost (ETS-TR/ Noncompliance)	Rapid increases in the unit cost of carbon following the introduction of the Emissions Trading System in 2026; need for internal carbon pricing and green CAPEX	Unchanged
Earthquake Risk	A nationwide risk. Losses may be difficult to recover in the event of a major earthquake, and project CAPEX may increase.	Unchanged
Cybersecurity & Personal Data Protection Law (KVKK) Violations	Financial penalties and service disruptions resulting from breaches of tenant data and building automation systems	Unchanged
Currency and Interest Rate Volatility	Mismatch between revenue and expense currencies and volatility in financing costs; pressure on NAV and profitability	Unchanged
Project Delays (Construction & Permitting)	Deviations due to supply, permit, or contractor issues increasing the cost of capital and deferring sales revenue	Unchanged
Energy Price Volatility	Fluctuations in wholesale electricity and natural gas prices; uncertainty regarding the allocation of rental expenses and the OPEX budget. Energy expenses increased by 290% in 2025.	Upward ↑ — Updated based on 2025 data
Water Scarcity	Water-supply risks in Antalya, Kuşadası, and Didim; critical to hotel operations. WRI rates the risk as High (3/5).	Unchanged
Occupational Accident Risk (Tourism)	Risk of occupational accidents in hotel operations. In 2025, 262 occupational accidents occurred at Ela Excellence.	New—Added in 2025.

Note: Compared to the 2024 report, the risk of energy price volatility has been revised upward, and the risk of workplace accidents has been added as a new risk.

7. RISK MANAGEMENT

Assets Exposed to Climate Risks

The total value of assets exposed to the climate risks specified in the data-collection form is TL 23.93 billion (Büyükyalı and Ela Excellence). This amount corresponds to approximately 65.6% of the total investment property portfolio (TL 36.50 billion).

7.2. MANAGEMENT OF CLIMATE RISK

We have designed a set of protocols to monitor, prioritize, and mitigate climate-related physical and transition risks in real time at every level of our operations. Our COSO-aligned framework includes specific trigger thresholds, automated early warning systems, and field-applicable action steps for five critical physical risks: floods, extreme heat, wind, water scarcity, and fire.

Physical Risk Protocols

Protocol	Purpose/Scope	Trigger Threshold & Monitoring	Preventive/Mitigating Action	Key Performance Indicator (KPI)	2025 Status
P1—Flood & Storm Surge	Acute flooding risk at coastal and riverside assets	24-hour rainfall ≥ 110 mm or İSKİ "Red" early-warning level	Automated reverse-siphon pumping capacity ≥ 1,000 m^3/hour; 0.8-meter-high protective wall; parametric flood insurance	Expected annual loss/NAV < 0.3%	The Büyükyalı barrier system is operational, and the insurance policy was renewed.
P2—Extreme Heat & Urban Heat Island	Thermal comfort and energy consumption in assets in Istanbul and the Aegean	Tmax ≥ 38°C for 3 consecutive days; PMV > +0.7	Reflective roof (SRI ≥ 0.75); green roof and evaporative cooling; dynamic optimization of BMS set points	Energy intensity (kWh/m^2) ≤ 145	The scope of BMS 4.0 is being expanded.
P3—Severe Winds & Storms	High-rise office facade integrity forecast	Wind speed > 28 m/s (Beaufort 11)	Facade bracket reinforcement; horizontal nighttime parking mode; safety film for glass-breakage protection	Storm-related maintenance and repair CAPEX < TL 1 million	Facade inspection completed.
P4—Water Scarcity & Drought	Water supply for resorts in Kuşadası and Didim	Annual rainfall < 600 mm and groundwater level II > 1 m/year	Graywater and RO system (150 m^3/day); transition in landscaping from turfgrass to native flora	Change in municipal water withdrawal ≤ -15%	The Ela graywater system is becoming operational.
P5—Wildfire	Hotel sites in Didim and Demre	Temperature > 33°C, relative humidity (RH) < 20%, and wind speed > 20 km/h	30 m strip cleared of flammable vegetation; 500 m^3 firefighting-water reservoir; solar-powered early smoke-detection sensor	Annual increase in fire insurance premiums < 5%	Fire risk assessment updated.

Transition Risk and Opportunity Indicators

The transition risk and opportunity indicators planned for annual reporting are presented below:

Code	Indicator	Definition	2030 Target	2025 Status	Change from 2024
T-1	Internal Carbon Price (EUR/tCO_2e)	Shadow cost used in investment feasibility studies	≥ 50	Work initiated (Q3 2025)	New
T-2	Portfolio Carbon Intensity ($kgCO_2e/m^2$ GLA)	Total Scope 1 and Scope 2 emissions/GLA	~ 50% (2024 baseline)	167 $kgCO_2e/m^2$	Baseline year revised
T-3	Taxonomy-Aligned Revenue (%)	Rental income meeting the EU Taxonomy's definition of "green"	≥ 40	—	Unchanged
T-4	Green Financing Ratio (%)	Ratio of investment financing from green funding sources to total investment financing	≥ 50	[In preparation]	Unchanged
T-5	Tenant Carbon Index	Tenant-based emissions/revenue	~ 30%	[Awaiting Scope 3 methodology]	Unchanged
T-6	Transition Readiness Score	Disclosure fully aligned with CDP and TCFD	"A-"	CDP submission planned	Unchanged

7. RISK MANAGEMENT

7.3. CONTROL AND MITIGATION MEASURES

A three-tiered oversight architecture has been designed to ensure the effectiveness of Özak REIC's climate risk management protocols:

- **Tier 1—Operational Monitoring:** Facility teams and the central BMS/IoT system monitor flood, temperature, and wind threshold exceedances through the EDRC Early Warning Dashboard with a five-minute delay. When a critical alarm is triggered, the incident-management process begins automatically.
- **Tier 2—Committee Review:** The Early Detection of Risk Committee, chaired by the CFO, prepares an assessment report on the protocol performance indicators and presents its findings. Systematic reporting to the Board of Directors is planned to begin in 2026.
- **Tier 3—Independent Assurance:** Energy and environmental data logs are subject to an annual IT audit to verify data integrity, while the financial impacts of the risk protocols, including NAV calculations and insurance premiums, are subject to a comprehensive sustainability assurance process.

7.4. OPPORTUNITY IDENTIFICATION, ASSESSMENT, AND PRIORITIZATION

Özak REIC considers climate-related opportunities to be an integral part of its risk management process. Opportunities are scored with a "positive impact" score in the same COSO matrix and submitted for investment committee review. The main opportunities evaluated in 2025 are:

Opportunity	Description	Expected Financial Impact	Status
Green lease premium	Rent premium and lower vacancy rates in LEED/WELL-certified spaces	TL 2 million in additional annual EBITDA	Active—Bulvar 216 LEED approval
Renewable energy CAPEX incentive	YEKA/SPP and CAPEX subsidized through green loans	+2% CAPEX savings	The feasibility study for the Ela SPP was completed, but clarification regarding the permitting process is pending.
Circular material gains	Recovery and procurement of second-life materials	+TL 50 million in material-cost savings	Zero Waste Certificate obtained.
Green loan/sustainable financing	Access to low-cost financing	30–45 bps spread advantage	2027 target—in study phase
Green supply chain	Tenant demand, collaboration, increase in net profitability	+TL 50 million (tenant demand)	Pilot supplier ESG scoring program

7.5. INTEGRATION INTO OVERALL RISK MANAGEMENT

Sustainability- and climate-related risk management processes are integrated into Özak REIC's overall enterprise risk management (ERM) framework through the following mechanisms:

- Within the COSO matrix, ESG-related climate risks are addressed with the same rigor as traditional risks such as currency and interest rate volatility, thereby systematically supporting portfolio resilience.
- The Early Detection of Risk Committee addresses climate-related risks and assesses physical and transition climate risks.
- Beginning in 2026, transition indicators such as carbon pricing, taxonomy alignment, and the green financing ratio are expected to be incorporated into annual performance reporting to inform the Board of Directors' strategic decisions.
- Climate-risk scores for flooding, earthquakes, and wildfires are used to evaluate policy terms during insurance renewals.

7.6. DEVELOPMENT PLAN AND CONTINUOUS IMPROVEMENT

Beginning in 2025, the following development plans are being implemented to enhance our risk management capabilities:

1. Integrated Business Continuity Plan (BCP)

- Specific recovery time objectives (RTOs) for flooding, fire, extreme heat, and cyber breach scenarios were updated: no more than eight hours for critical building systems and two hours for data centers.
- Through two-way integration with the EDRC Early Warning Dashboard, the BCP automatically assigns materials and personnel as soon as an alarm is triggered.

2. Annual Tabletop and Field Exercises

- A tabletop drill is conducted annually for P1–P5 protocols, and a real-time field drill is conducted every two years; participation rates and response times are reported.
- In the 2024 drill, the response time for the flood scenario was reduced (a 36% improvement). A new real-time update is planned for 2026.

3. Capacity Building & Training

- A mandatory "Climate Adaptation 101" e-learning module for all facility teams.
- Beginning in 2026, the in-house "climate finance" workshop will focus on internal carbon pricing and taxonomy alignment in line with the timetable for regulatory developments in Türkiye.

4. Ela Excellence OHS Improvement Program (Post-2025)

Following the occupational accidents at Ela Excellence Resort Belek in 2025, a comprehensive OHS improvement program was launched:

- A root cause analysis was performed.
- All procedures were reviewed under the ISO 45001 OHS Management System, which is valid until October 30, 2026. Ela also holds ISO 14001 and ISO 50001 certifications, valid until October 30, 2026, and January 15, 2027, respectively.
- A pilot program using wearable sensors to prevent accidents in real time is under consideration.
- An additional OHS training program was provided to all Ela employees, with a total of 15,622 training hours delivered in 2025.

8. METRICS AND TARGETS

This section presents Özak REIC's environmental and social performance metrics for 2025, comparative data for 2024, and strategic targets. Because this is the second reporting year, comparative information is required (TSRS 1, para. 70).

8.1. CLIMATE AND ENERGY METRICS

A. Greenhouse Gas Emissions

Indicator	2024	2025	Change (%)	Method/Source
Scope 1—Natural Gas (tCO_2e)	17,777,816	18,663,099	+5%	IPCC 2006, 35.17 MJ/m^3, 56.1 $kgCO_2/GJ$
Scope 1—Vehicle Fuel (tCO_2e)	Not disaggregated	112.58	—	REIC: ≈28.09 + Ela: ≈81.84 + Generator: ≈2.65. Rough estimate—confirmation of the MJ/L conversion factor required.
Scope 1—F-Gases/ Fugitive Emissions (tCO_2e)	Not reported	140.50	—	IPCC 2006 Table 7.9 leakage rates x estimated refrigerant charges x AR6 GWP. 370 units (Ela) + 497 outdoor units (REIC, R-32).
Total Scope 1 Emissions (Partial)	35,093.10	37,076.07	—	Includes the IPCC estimate for F-gas emissions (140.50 tCO_2e: Ela 137.82 + REIC 2.68).
Scope 2—Electricity, location-based (tCO_2e)	9,694.28	8,501.27	–12.3	Location-based: 0.469 tCO_2e/MWh. Market-based: 3,961.60 tCO_2e (I-REC coverage of 9,684 MWh reduced Ela Excellence's market-based electricity emissions to zero).
Total Scope 1 and Scope 2 Emissions (Partial) (tCO_2e)	44,787.38	45,577.34	+1.38%	Includes the IPCC estimate for F-gas emissions. Excludes the natural gas adjustment.
Scope 3 (tCO_2e)	Exempt	Exempt	—	TSRS 1, Appendix E transitional relief
GLA (m^2)	272,357.38	272,357.38	0.0	Leasable area (unchanged)
Emission Intensity (Partial) (tCO_2e/m^2)	0.164	0.167	+1.8%	Scope 1 and Scope 2 emissions (including the Ela and REIC F-gas estimate)/GLA

Emission factor update: The 2024 report used the EVÇED factor of 0.442 tCO_2e/MWh. In the 2025 report, an emission factor of 0.469 tCO_2e/MWh, based on EVÇED's 2025 publication, was applied to both years. This change constitutes an update to an external source and required the presentation of restated comparative information (TSRS 1, paras. 70 and B52). Although location-based emissions increased by 1.8%, total market-based emissions decreased by 1.1% as a result of I-REC certificates (2024 market-based emissions: 41,504.40 metric tons; 2025 total market-based emissions: 41,037.67 metric tons).

B. Methodology Note

Greenhouse gas emissions were calculated in accordance with the GHG Protocol (2004) Corporate Standard, using the operational control approach. The emission factors, GWP values, and data sources used are summarized below:

Parameter	Value	Source	Note
Natural Gas NCV	35.17 MJ/m^3	IPCC 2006	Assumed HHV
Natural Gas EF	56.1 $kgCO_2/GJ$	IPCC 2006	Stationary combustion
Gasoline EF	69.3 $kgCO_2/GJ$	IPCC 2006	Road vehicles
Diesel EF	74.1 $kgCO_2/GJ$	IPCC 2006	Road vehicles and generator
Electricity EF	0.469 tCO_2e/MWh	EVÇED (ETKB-FRM-042)	2025 publication, location-based
GWP-CH_4	28	IPCC AR5	100-year GWP
GWP-N_2O	265	IPCC AR5	100-year GWP
Consolidation	Operational control	GHG Protocol	Entire portfolio included
GWP-R-404A	4,728	IPCC AR6 (WG1 Table 7.15)	HFC blend—cold room
GWP-R-410A	2,255.5	IPCC AR6 (WG1 Table 7.15)	HFC blend—air conditioning
GWP-R-134A	1,530	IPCC AR6 (WG1 Table 7.15)	HFC—central chiller
GWP-R-22	1,960	IPCC AR6 (WG1 Table 7.15)	HCFC (phased out)
GWP-R-32	771	IPCC AR6 (WG1 Table 7.15)	HFC—electrical panel
F-Gas Leakage—Air Conditioning	1.0%/year	IPCC 2006 Vol. 3, Table 7.9	Split/VRF systems
F-Gas Leakage—Cold Room	7.0%/year	IPCC 2006 Vol. 3, Table 7.9	Cold room + chiller
F-Gas Leakage—Refrigerator	0.1%/year	IPCC 2006 Vol. 3, Table 7.9	Commercial refrigerator/ undercounter refrigerator
GWP-R-32 (REIC)	771	IPCC AR6 (WG1, Table 7.15)	HFC—air-conditioning units at REIC office and residential properties (497 units)

Hybrid GWP Approach: IPCC AR5 GWP values (CH_4: 28, N_2O: 265) were used for combustion emissions from natural gas, gasoline, and diesel. For refrigerant emissions (F-gases/HFCs), IPCC AR6 GWP values were used because AR6 provides the most current and scientifically accurate values for refrigerants. This hybrid approach is consistent with ISO 14064-1 and GHG Protocol practices. F-Gas Calculation Note: Fugitive emissions from 370 refrigeration and air-conditioning units at Ela Excellence Resort and 497 outdoor air-conditioning units at REIC properties, involving six different gas types, were calculated using the default leakage rates in IPCC 2006 Volume 3, Table 7.9 and estimated refrigerant charges. Total F-gas emissions: 140.50 tCO_2e. Charge sizes: 700 g/unit for outdoor air-conditioning units; 220 g/unit for commercial and undercounter refrigerators; 5 kg/room for +4°C cold rooms (37 rooms); 8 kg/room for –18°C cold rooms (13 rooms); and 125 kg/chiller for Trane central chillers (3 units, user-confirmed). Minibars (583 units using R-600A, GWP ≈ 3) were excluded as negligible.

8. METRICS AND TARGETS

C. Energy Consumption

Indicator	2024	2025	Change (%)	Method/Source
Total Electricity Consumption (kWh)	20,670,109	18,126,376	–12.3	Meter data
Total Natural Gas Consumption (m^3)	17,777,816	18,663,099	+5	Invoice
Vehicle Fuel-Gasoline (L)	Not disaggregated	29,285	—	Fuel receipts
Vehicle Fuel-Diesel (L)	Not disaggregated	16,060	—	Fuel receipts; includes generator consumption
Total Energy Consumption (MWh Equivalent)	194,349	200,883	+3.4	Conversion of electricity, natural gas, and fuel to MWh
Share of Renewable Energy (%)	33.9% (I-REC 7,000 MWh / 20,670 MWh)	9,684 MWh of I-REC-certified electricity for Ela Excellence—53.4% of total electricity consumption across the portfolio. Sourced from geothermal energy (Salihli Geothermal Power Plant, Sanko Energy).	33.9% (I-REC 7,000 MWh / 20,670 MWh)	53.4% (9,684 MWh of I-REC-certified electricity/total consumption of 18,126 MWh)

D. Energy Consumption by Facility (2025)

Facility	Electricity (kWh)	Natural Gas (m^3)	Water (m^3)	Note
Fişekhane	1,327,377	—	26,912	No NG
Bulvar 216	506,132	—	8,647	No NG
Bulvar 216 34	195,845	—	1,409	No NG
Büyükyalı Residential Complex	4,852,080	17,715,215	43,662	
Holding Building	970,401	6,435	10,757	
Ela Excellence	9,679,462	941,449	330,018	53% of total energy consumption across the portfolio
Göktürk 1	386,413	—	18,402	NG is charged to the apartments.
Göktürk DOA	208,666	—	11,804	NG is charged to the apartments.
Total	**18,126,376**	**18,663,099**	**451,611**	



8.2. WASTE AND CIRCULAR ECONOMY

Indicator	2024	2025	Change (%)	Source
Total Waste (t)—Consolidated	2,127	869.3 (partial: Ela 750.9 + 118.3 from two REIC facilities)	—	EIA declarations
Hazardous Waste (t)	76	3.1 (Ela only)	—	LoW codes 15 01 10* and 17 05 05*
Non-Hazardous Waste (t)	1,051	866.2 (partial)	—	LoW code 20 03 01
Recyclability Rate (%)	50	35.3 (based on Ela data)	—	Receipts from AATF-licensed recovery facilities
Portfolio Coverage under the "Zero Waste Certificate" (Facilities)	6/9	7/9	+1 facility	Büyükyalı added (01/2026)
Ela Excellence Total Waste (t)	1,280	750.9 metric tons (750,921 kg). Recycled: 264.8 metric tons (35.3%). Composted: 241.5 metric tons. Hazardous: 3.1 metric tons.	—	Hotel kitchen + landscaping
Circular Material Rate (% CAPEX)	11	15	+4 percentage points	LEED certification report

8. METRICS AND TARGETS

8.3. WATER MANAGEMENT

Indicator	2024	2025	Change (%)	Source
Total Water Withdrawal (m^3)-Portfolio	561,000	451,611	–19.5	Municipal meter data
Indicator	2024	2025	Δ (%)	Source
Total Water Withdrawal (m^3)-Portfolio	561,000	451,611	–19.5	Municipal meter data + groundwater data
Municipal Water (%)	~95	70.7	—	Calculated
Groundwater (%)	~5	29.3	—	Ela ESG form
Rainwater Harvested (m^3)	14,000	0	—	Ela form: zero reported
Water Intensity (L/m^2 GLA)	2,060	1,658	–19.5	Total withdrawal/272,357 m^2
Wastewater Discharge (m^3)	534,000		—	Flowmeter data required
Ela Excellence Water Withdrawal (m^3)	440,681	330,018	–25.1	Municipal water + groundwater
-Ela Grid		196,957	–20.7	Meter data
-Ela Groundwater	192,440	132,434	–31.2	Ela ESG form
Water Scarcity Risk (WRI)	High (3/5)	High (3/5)	—	WRI Aqueduct Antalya
Municipal Water (%)	95	70.7	—	Consumption data, invoices
Rainwater & Gray Water Reuse (%)	5	5	—	BMS records
Ela Excellence Water Withdrawal (m^3)	248,260	330,018	–20.7	
Water Scarcity Risk (WRI)	High (3/5)	High (3/5)	—	WRI Aqueduct Antalya

Özak REIC's total water withdrawal decreased from 561,000 m^3 to 451,611 m^3 (–19.5%). Ela Excellence Resort continues to be the largest water consumer, accounting for 73.1% of the portfolio's total water consumption. Another reason for the decrease is that the 2024 Büyükyalı data included tenant consumption that had not been disaggregated. In 2025, consumption under operational responsibility, such as landscaping and common-area consumption, was disaggregated as intended and used as the basis for reporting (2024: **331,386 m^3**; 2025: **43,662 m^3**). The WRI water scarcity risk for the Antalya region is classified as "High" (3/5).

8.4. SOCIAL PERFORMANCE INDICATORS

A. Employment and Diversity

Indicator	2024	2025	Note
Total Number of Employees	956	1,091	+14.1% (including seasonal and contract hotel employees)
Female Employees (%)	38	39.44	+1.4
Male Employees (%)	62	60.56	-0.97
Female Managers (%)—REIC	14.6	17.23	Increase
Female Managers (%)—Ela	-	33	
Average Age	34	33	
Employees with Disabilities	-	16 (REIC + Ela 9)	
Employee Turnover Rate (%)	-	14.68	
Unionized Employees	No	No	

8. METRICS AND TARGETS

B. Occupational Health and Safety (OHS)

Indicator	2024	2025	Note
Accident Frequency-LTIFR	2.83	2.04	Decrease, despite an increase in the number of employees.
Number of Occupational Accidents	320	Ela: 262, REIC facilities: 1. Ela total working hours: 1,994,460	Definition of occupational accident: GRI 403-9
Fatal Accident	0	1 (Ela Excellence)	The incident occurred when an employee suffered a heart attack during work hours. Although the employee was immediately taken to the hospital, they unfortunately passed away.
Number of Lost Workdays	-	12,196 (Ela: 12,183, REIC: 13)	
Total Working Hours—Ela	-	2,278,008	
Total Working Hours—REIC (11 locations)	-	153,773	
OHS Training Hours per Employee	11.3	REIC: 12.57; Ela: ~ 5	Mandatory/voluntary breakdown will be reported in 2025

C. Training and Development

Indicator	2024	2025	Note
Total Training Hours—REIC	2,940	2,968	
Total Training Hours—Ela	7,863	15,622	
Average Training Hours per Employee	11.3	17	Consolidated data; increase from 2024.
Employees Receiving ESG Training (%)	-	-	

D. Community Investment and Stakeholder Contribution

Indicator	2024	2025	Note
Community Investment (TL)	87,790,377	59,891,994	-31.8%
Number of Suppliers-REIC	-	152 (140 local)	Local ratio: 92.1%
Number of Suppliers-Ela	-	672 (534 local)	Local ratio: 79.5%
Number of Ethics Hotline Reports	12	20	SpeakHub platform
Cases Investigated/Closed	-	18/11	



8. METRICS AND TARGETS

8.5 TARGETS AND PROGRESS

Strategic KPI	2024 Baseline	2026 Target	2030 Target	KPI	Related SDGs	2025 Progress
Scope 1 and Scope 2 Emissions Intensity ($kgCO_2e/m^2$ GLA)	0.16	-10%	–42%	$kgCO_2e/m^2$ GLA	7, 13	1.1% decrease in market-based emissions due to I-REC certificates; 0.05% increase in location-based emissions.
50% Certified GLA	LEED/WELL/ BREEAM 25%	25%	50%	Percentage of GLA	9, 11	Bulvar 216 LEED approval
Share of Renewable Electricity (%)	33.9% (I-REC 7,000 MWh/20,670 MWh)	Increase	≥ 70%	MWh/Total	7, 12	9,684 MWh of I-REC-certified electricity for Ela Excellence—53.4% of total electricity consumption across the portfolio. Sourced from geothermal energy (Salihli GPP, Sanko Energy).
Energy Intensity (kWh/m^2)	273	-10%	–30%	kWh/m^2 GLA	7, 12	Location-based increase
Water Intensity (L/m^2 GLA)	580	–20%	–30%	L/m^2	6	1,658
Waste Recovery Rate (%)	50	≥60%	≥90%	Metric Tons Recovered/ Total Waste	12	
Share of Green-Certified GLA (%)—2030	—	≥30%	≥50%	LEED/ BREEAM/ WELL	9, 11	Bulvar 216 LEED
Female Managers (%)	14.6	≥20%	—	—	5, 10	17.23 (REIC)
LTIFR (Lost Time Injury Frequency Rate)	2.83	≤1.0%	—	—	8	Decrease
Percentage of Spend with ESG-Compliant Suppliers	—	≥70%	—	—	8, 12	Pilot phase

For the energy intensity calculation, total primary energy consumption from electricity, natural gas, and vehicle fuel was converted into MWh equivalent and divided by the gross leasable area of 272,357 m^2. Because a different scope was used in the 2024 report, the comparison should be assessed on a proportional basis.

Greenhouse Gas Targets-Additional Disclosures

Scope: Scope 1 (CO_2, CH_4, and N_2O; HFCs will be added when F-gases are included) and Scope 2 (CO_2). Scope 3: Exempt under the transitional relief in paragraphs E5–E6.

Gross vs. Net: All targets are based on gross emissions. Purchases of I-REC certificates and carbon credits will be reported separately in relation to net targets (TSRS 2, para. 36(c)).

Sectoral Approach: The IEA NZE 2050 roadmap and the SBTi Buildings sector guidance were used as references.

Carbon Credits: In 2025, I-REC certificates and carbon credits were purchased for Ela Excellence. Information on the credit type, verification standard, and permanence is available in the appendices.



9. REAL ESTATE-FOCUSED SUSTAINABILITY

With its vision of "low carbon throughout the life cycle," Özak REIC is preparing to manage its real estate portfolio according to environmental and social criteria from the design stage through the end of operations. LEED- and BREEAM-targeted project designs, green roofs, rainwater-harvesting solutions, and BIM-based energy-modeling applications reduce material waste by up to 15% during the early stages of projects. Smart building automation systems focused on reducing energy intensity during operations have also been rolled out across the portfolio.

In its tourism operations, the establishment of a separate emissions-monitoring and target-setting system for high-consumption assets such as Ela Excellence Resort reflects the Company's "customized sustainability" approach for its different functions.

9.1. GREEN BUILDING CERTIFICATION STRATEGY

We aim to continuously increase the share of energy-efficient and green-certified assets in our portfolio. We expect 50% of our total gross leasable area to be LEED, BREEAM, or WELL certified by the end of 2028.

Project/Asset	Certification Level	Rating System & Version	Status (2025)	Change from 2024	Notes
Bulvar 216 Ataşehir	Silver	LEED BD+C Core&Shell v2009	Certified	Unchanged	GLA: 38,000 m². Zero Waste Certificate in place.
Ela Excellence Resort	Green Key	Global Hotel Green Key	Renewed (2023)	Unchanged	Travelife Gold; water- and energy-conservation program; ISO 14001, ISO 45001, and ISO 50001
Kemer Hotel (Development)	LEED&BREEAM	New Construction v6	Target – Construction in 2026	Unchanged	Project in the planning phase

Updated Targets Through 2030

Indicator	2024 Baseline	2026 Target	2030 Target	KPI	Related SDGs
Scope 1 Emissions Intensity ($kgCO_2e/m^2$ GLA)	54	-10%	-42%	Internal carbon price of EUR 50/t	
Scope 2 Emissions Intensity ($kgCO_2e/m^2$ GLA)	13	-25%	-60%	YEKA/rooftop and ground-mounted SPPs	
Share of Renewable Electricity	12%	≥30%	≥80%	BMS 4.0 + deep retrofit	
Energy intensity (kWh/m^2)	265	-10%	-30%	BMS 4.0 + deep retrofit	

9.2. CLIMATE ADAPTATION AND RESILIENT CONSTRUCTION

The assets in our portfolio are being strengthened through measures to adapt to physical climate risks. The following table summarizes the priority climate risks and the measures taken as of 2025:

Risk	Impact Area	Adaptation Solution	2024 Progress	2025 Progress	KPI	2025 Progress
Flood/ Storm Surge	Basement parking and technical rooms (Büyükyalı)	Inverted siphon with a capacity of 1,500 m^3/hour + 0.8-meter-high protective wall; parametric flood insurance	Design completed	Barrier system active; insurance renewed	60% reduction in expected loss	1.1% decrease in market-based emissions due to I-REC certificates; 0.05% increase in location-based emissions
Extreme Heat	Energy OPEX, guest comfort (Ela Excellence)	5 MWp ground-mounted SPP + 2 MWh battery	Feasibility approval	The feasibility study for the solar power plant has been completed; the battery is under evaluation.	Energy intensity –11%	Bulvar 216 LEED approval
Urban Heat Island	Indoor comfort, sales price (Bulvar 216)	8,000 m^2 green roof; reflective facade with an SRI of at least 0.75	40% completed	LEED certification obtained; green roof 100% completed	PMV comfort score ≤ +0.5	9,684 MWh of I-REC-certified electricity for Ela Excellence—53.4% of total electricity consumption across the portfolio. Sourced from geothermal energy (Salihli GPP, Sanko Energy).
Earthquake	Entire portfolio (Istanbul, Antalya)	Retrofitting + insurance	Ongoing	Structural assessment completed in 2025	CAPEX allocation	Location-based increase

9. REAL ESTATE-FOCUSED SUSTAINABILITY

9.3. TENANT AND USER HEALTH & COMFORT (WELL/YÖN)

Özak REIC places tenant and user health at the center of its real estate value proposition. We regularly monitor indicators such as indoor air quality, access to natural light, and WELL certification coverage.

Indicators	2022	2023	2024	2025	2030 Target	Note
Indoor Air Quality-TVOC (mg/m^3)	230	198	142	157	<100	WELL v2 Air A01 sensor
Employees with Access to Natural Light During the Day (%)	62%	65%	71%	75%	>85%	Büyükyalı office plan revision
WELL Core & Shell-Certified GLA (%)	12%	15%	18%	18%	60%	First pilot: Mahmutbey Office
Tenant Satisfaction (Net Promoter Score)	28	31	35	-	≥+45	1,140 responses in the annual survey (2024)

New Policy (2026): "Green + Health-Focused Lease"—Monthly reporting of IAQ, energy, and waste data will be required, with more favorable lease options offered to tenants that meet their improvement targets.

9.4. SMART BUILDINGS & DIGITALIZATION

We are enhancing energy efficiency, maintenance optimization, and the tenant experience across our real estate portfolio through smart building technologies and digital transformation initiatives.

Component	2025 Scope	2027 Plan	Benefits	Change from 2024
BMS 4.0—Fuel and HVAC IoT Sensors	55% of GLA (Bulvar 216, Büyükyalı, and Mahmutbey)	75%	Real-time monitoring of kWh/m^2; 6% savings in OPEX	Scope expanded to 55% (2024 target: 55%)
Digital Twin (BIM-FM)	Kemer (design phase)	+ Kemer Hotel	8% reduction in maintenance OPEX; carbon estimation module	Design ongoing
Tenant ESG Dashboard	Pilot 5 tenants, 24 sensors	20 tenants	Transparency, facilitation of joint savings projects	Pilot active
Cybersecurity – ISO 27001	Pilot selection and certification preparation	SOC 2 certification	Tenant data breach risk ↓	Preparations ongoing; addition of SOC 2 planned for 2025
Digital ESG Data Platform	Concept design	IoT–ERP Integration	Real-time monitoring of energy, water, and waste	New-launched in 2025.

9. REAL ESTATE-FOCUSED SUSTAINABILITY

9.5. SPECIAL PROJECT



9.6. SUPPLY CHAIN AND RESPECT FOR HUMAN RIGHTS

Program	2025	2030 Target	Status
Suppliers with ESG Score ≥70 (%)	-	80%	Pilot Phase
Local Procurement Rate (%)—REIC	92.1% (140/152)	65%	↑ Increase
Local Procurement Rate (%)—Ela	79.5% (534/672)	80%	Ongoing
Child Labor/Forced Labor Incidents	0	0	= Zero policy
Supplier Audits (on-site/audit)	-	100% critical	In progress

Özak REIC plans to align all procurement of goods and services with the UN Global Compact, the ILO's fundamental conventions, and TSRS 1 principles through its Supplier ESG Guide, which is being prepared to take effect in 2027. While an EcoVadis-based assessment is required for contracts exceeding TL 10 million, suppliers with an ESG score of at least 45/100 accounted for 71% of our procurement volume. Our goal is to increase this proportion to 80% by 2026.

The supplier ESG assessment process is scheduled to begin in 2026.

9.7. BIODIVERSITY

Biodiversity-sensitive areas near Özak REIC's operational boundaries are being assessed. Endemic species conservation efforts are planned, particularly in Antalya (Ela Excellence) and Kemer (development project).

Asset/Project	Biodiversity Status	Measures Taken/Planned	Status
Ela Excellence (Belek)	Mediterranean coastal ecosystem; endemic plant species on hotel grounds	Landscaping program to replace lawns with native flora	Ongoing
Kemer Hotel (Development)	Maquis shrubland; near Caretta caretta nesting area	Project in planning stage	Planning
Büyükyalı	Urban regeneration area; Marmara coastline	Urban adaptation while maintaining the proportion of green space	Completed
Fişekhane	Historic green space; urban biodiversity	Existing trees were preserved during restoration	Completed

10. APPENDICES

10.1. APPENDIX 1: ENERGY AND EMISSIONS INDICATORS (CONSOLIDATED)

Indicator	2024	2025	Change (%)	Method/Source
Total Electricity Consumption (kWh)	20,670,109	18,126,376	-12.3%	Meter data → TEİAŞ grid factor
Total Natural Gas Consumption (m^3)	17,777,816	18,663,099	-	Invoice—2024 data is incorrect
Scope 1 Emissions (tCO_2e)	35,093.10	37,076.07	-	IPCC 2006; includes F-gas IPCC estimate
Scope 2 Emissions (tCO_2e)	9,694.28	8,501.27	-12.3%	EVÇED emission factor: 0.469 tCO_2e/MWh (restated)
Total Scope 1 and Scope 2 Emissions (tCO_2e) (Location-Based)	44,787.38	45,577.34	-	Includes F-gas estimate
Share of Renewable Electricity (%)	33.9% (7,000 MWh I-REC/20,670 MWh total)	9,684 MWh of I-REC-certified electricity for Ela Excellence—53.4% of total electricity consumption across the portfolio. Sourced from geothermal energy (Salihli GPP, Sanko Energy).	33.9% (7,000 MWh I-REC/20,670 MWh total)	53.4% (9,684 MWh of I-REC-certified electricity/18,126 MWh total)
Energy Intensity (kWh/m^2 GLA)	713	737	-	Total energy/GLA
Emissions Intensity ($kgCO_2e$ /m^2 GLA)	0.164	0.167	-	Scope 1 and Scope 2 emissions/GLA

10.2. APPENDIX 2: WATER AND WASTEWATER INDICATORS (CONSOLIDATED)

We enhance energy efficiency, maintenance optimization, and the tenant experience across our real estate portfolio through smart building technologies and digital transformation initiatives.

Indicator	2024	2025	Change (%)	Method/Source
Total Water Withdrawal (m^3)-Portfolio	561,000	451,611	-19.5%	Municipal meter data
Municipal Water (%)	95%	70.7%	-	Invoice details
Water Intensity (L/m^2 GLA)	580	1,658	-	Total withdrawal/total gross leasable area
Wastewater Discharge (m^3)	534,000	-	-	Treatment plant outlet flowmeter
Wastewater Reuse Rate (%)	47%	-	-	Graywater & rainwater harvesting
Number of ISO 14001-Certified Facilities	5	5	-	Certification records

Ela Excellence 2025 Water Performance

Indicator	Value	Note
Water Withdrawal (m^3)	196,957	Municipal water + groundwater
Water Scarcity Risk (WRI Aqueduct)	"High" (3/5)	Antalya region

10. APPENDICES

10.3. APPENDIX 3: WASTE AND CIRCULAR ECONOMY INDICATORS (CONSOLIDATED)

Indicator	2023	2024	2025	Method/Source
Total Waste (t)	2,080	2,127	869.3 (partial: Ela 750.9 + 118.3 from two REIC facilities)	Environmental Permit and Licensing Portal (e-declaration)
Hazardous Waste (t)	87	76	3.1 (Ela Excellence only)	LoW codes 15 01 10* and 17 05 05*
Non-Hazardous Waste (t)	840	1,051	866.2 (partial)	LoW code 20 03 01
Recyclability Rate (%)	38%	50%	35.3% (based on Ela data)	Receipts from AATF-licensed recovery facilities
Zero Waste Certificate Coverage (Facilities)	-	6/9	7/9	Büyükyalı (January 2026)



10.4. APPENDIX 4: HR AND EMPLOYEE WELL-BEING INDICATORS

Indicators	2024	2025	Description/Note
Total number of employees	956	1,091	
Female Employees (%)	38%	39.44%	
Male Employees (%)	62%	60.56%	
Female Managers (%)—REIC	14.6%	17.23%	
Female Managers (%)—Ela	-	33%	
Employees with Disabilities	-	16	REIC: 7 + Ela: 9 = 16
Employee turnover rate (%)	-	14.68%	
Annual training hours per employee	11.3	REIC: 12.57; Ela: ~ 5	REIC: 2,968 hours + Ela: 15,622 hours
Number of occupational accidents	320	263	Ela: 262; REIC facilities: 1. Ela total working hours: 1,994,460
Fatal accident	0	1	An employee who suffered a heart attack during work hours and was transferred to the hospital.
Lost workdays	-	12,196	Ela: 12,183; REIC: 13
Community investment (TL)	87,790,377	59,891,994	-31.8%
Number of ethics reports	12	20	SpeakHub platform

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10.5. APPENDIX 5: GOVERNANCE, ETHICS, AND COMPLIANCE INDICATORS

Indicator	2023	2024	2025	Method/Source
Number of Board Members	6	6	6	Disclosures on the Public Disclosure Platform (PDP)
Independent Board Members (%)	33%	33%	33%	CMB Corporate Governance Principles
Female Board Members (%)	17%	17%	17%	-
Board Participation in ESG Training (%)	-	-	100%	Four-session Climate & Finance workshop
Number of Meetings per year	44	34	53	Minutes
Number of Ethics Reports	0	0	20	SpeakHub anonymous reporting hotline
Confirmed Violations	0	0	11	Internal audit report
Corruption Cases/Fines (TL)	0	0	0	Legal
Information Security Breaches	0	0	0	ISO 27001 is expected to be implemented in 2026.
Bonus Linked to ESG Performance (%)	0	0	In the planning stage	To be implemented in 2026



10.6. APPENDIX 6: I-REC CERTIFICATE DETAILS AND MARKET-BASED SCOPE 2

The I-REC-certified electricity is sourced from geothermal energy and has an emission factor of 0.000 tCO_2e/MWh. Electricity consumption covered by I-REC certificates is treated as zero-emission, while the remaining consumption was calculated using an emission factor of 0.469 tCO_2e/MWh.

Market-Based Scope 2 Summary

Note: The 2024 I-REC certificate covers 70.2% of Ela Excellence's 2024 electricity consumption of 9,973 MWh. The market-based Scope 2 calculation was not performed in the 2024 report; this information is presented for the first time in the 2025 report.

Certificate: February–December 2024
Beneficiary: Aktay Otel İşletmeleri Anonim Şirketi (operator of Ela Excellence Resort) | Supplier: Sanko Enerji San. ve Tic. A.Ş. | Quantity: 7,000 MWh | Period: February 1, 2024–December 31, 2024 | Source: Salihli GPP-2, Manisa (Geothermal, ES810, TC491) | Verification: I-REC Standard / Evident Registry | Verification Key: 28561518

Total I-REC for 2025: 9,684 MWh—covers 100% of Ela Excellence's electricity consumption of 9,679 MWh. Share of renewable energy across the portfolio: 53.4%.

Certificate 1: January–August 2026
Beneficiary: Ela Hospitality Turizm ve Otelcilik A.Ş. | Supplier: Sanko Enerji Sanayi ve Ticaret A.Ş. | Quantity: 3,137 MWh | Period: September 1, 2025–December 31, 2025 | Source: Salihli GPP-3, Manisa (Geothermal) | Verification: Foton Marketplace / Evident Registry | Verification Key: 18755219

Certificate 2: September–December 2025
Beneficiary: Ela Hospitality Turizm ve Otelcilik A.Ş. | Supplier: Sanko Enerji Sanayi ve Ticaret A.Ş. | Quantity: 6,547 MWh | Period: January 1, 2025–August 31, 2025 | Source: Salihli GPP-3, Manisa (Geothermal, ES810, TC491) | Verification: Foton Marketplace / Evident Registry | Verification Key: 22379651

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10.7. APPENDIX 7: TSRS COMPLIANCE INDEX

TSRS 1 Governance

TSRS Paragraph	Description	Report Section	Page
P.27(a)	Governing body, terms of reference, and competence	Governance (Section 5.1)	[22-24]
P.27(a)(i)	Terms of reference and competencies	Governance–Sustainability Committee	[22-23]
P.27(a)(ii)	Competence and skills	Governance (Section 5.1-B)	[23]
P.27(a)(iii)	Meeting frequency and provision of information	Governance (Section 5.1-C)	[24]
P.27(a)(iv)	Strategy, risk management, and trade-offs	Governance (Section 5.1-D)	[24]
P.27(a)(v)	Performance metrics and remuneration	Governance (Section 5.1-E)	[24]
P.27(b)	Management's role	Governance (Section 5.2)	[25-26]
P.27(b)(i–ii)	Delegation of responsibilities, controls, and integration	Governance (Section 5.2-A/B)	[25-26]

TSRS 1 Strategy

TSRS Paragraph	Description	Report Section	Page
P.29(a)	Identification of risks and opportunities and their time horizons	Strategy (Section 6.1)	[30-31]
P.30–31	Impacts (business model, value chain)	Strategy (Section 6.3)	[33]
P.32–34	Strategic responses, trade-offs	Strategy (Section 6.2)	[32]
P.35–40	Financial effects	Strategy (Section 6.4)	[34-35]
P.41–42	Climate resilience and scenario analysis	Strategy (Section 6.5)	[35-37]

TSRS 1 Risk Management

TSRS Paragraph	Description	Report Section	Page
P.43	Processes for identifying and monitoring risks	Risk Management (Section 7.1)	[38-40]
P.44(a)	Risk assessment methodology	Risk Management (Sections 7.1-7.2)	[38-41]
P.44(b)	Processes for identifying opportunities	Risk Management (Section 7.4)	[42]
P.44(c)	Integration into overall risk management	Risk Management (Section 7.5)	[43]

TSRS 1 Metrics and Targets

TSRS Paragraph	Description	Report Section	Page
P.45–50	Mandatory metrics (Energy, GHG Emissions, Water, Waste, etc.)	Metrics and Targets (Sections 8.1-8.4)	[44-51]
P.51–53	Targets and progress	Metrics and Targets (Section 8.5)	[52]

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TSRS 1 Climate-Related Disclosures

TSRS Paragraph	Description	Report Section	Page
P.6(a–b)	Climate governance and the role of management	Governance (Section 5)	[22-28]
P.9(a), 10–12	Identification and impacts of climate-related risks and opportunities	Strategy (Section 6.1)	[30-31]
P.13–14	Climate-related impacts and strategic response	Strategy (Sections 6.2-6.3)	[32-33]
P.15–21	Financial impacts, scenario analysis	Strategy (Section 6.4)	[34-35]
P.22–23	Climate resilience assessment	Strategy (Section 6.5)	[35-37]
P.24–25	Methodology for monitoring risks and opportunities	Risk Management (Section 7)	[38-43]
P.27–32	Mandatory climate metrics (GHG, energy)	Metrics and Targets (Section 8.1)	[44-46]
P.33–37	Targets and progress	Metrics and Targets (Section 8.5)	[52]
P.29–30	Statement on the Scope 3 transitional relief	About the Report (Section 1.3)	[4]

10.8. APPENDIX 8: GRI CONTENT INDEX

GRI Code	Description	Report Section	Page
2-1	Organizational details	Corporate Profile (Section 3)	[10-12]
2-2	Supply chain	Real Estate Sustainability (Section 9.6)	[58]
2-3	Reporting period, scope, and boundaries	About the Report (Section 1.1)	[2]
2-5	External assurance	About the Report/Appendices—Assurance	[71-73]
2-6	Activities, value chain	Corporate Profile (Section 3)	[10-12]
2-9	Governance structure	Governance (Section 5)	[22-28]
2-12	Sustainability strategy	Sustainability Approach (Section 4)	[14-20]
2-14	Board of Directors oversight	Governance (Section 5.1)	[22-24]
2-22	Statement from management	Messages from Our Leaders (Section 2)	[6-8]
2-29	Stakeholder engagement	Sustainability Approach (Section 4.2)	[15]
3-1	Materiality process	Sustainability Approach (Section 4.3)	[16-18]
3-2	List of material topics	Sustainability Approach (Section 4.3)	[16-18]
3-3	Management of each material topic	Relevant performance sections	Various
302-1	Energy consumption	Metrics and Targets (Section 8.1-C)	[46]
302-3	Energy intensity	Metrics and Targets (Section 8.1-C)	[46]
303-1	Water withdrawal	Metrics and Targets (Section 8.3)	[48]
303-2	Water management impacts	Metrics and Targets (Section 8.3)	[48]
305-1	Scope 1 emissions	Metrics and Targets (Section 8.1-A)	[44]
305-2	Scope 2 emissions	Metrics and Targets (Section 8.1-A)	[44]
305-3	Scope 3 emissions	About the Report (transitional relief)	[4]
305-5	Reduction of GHG emissions	Metrics and Targets (Section 8.5)	[52]
306-1	Waste generation and management	Metrics and Targets (Section 8.2)	[47]
306-2	Waste types and disposal methods	APPENDIX 3	[62]
401-1	Employment, new hires	Metrics and Targets (Section 8.4-A)	[49]
401-2	Employee benefits	APPENDIX 4	[63]
403-1	OHS management system	Risk Management (Section 7.6)	[43]
403-9	Work-related injuries	Metrics and Targets (Section 8.4-B)	[50]
404-1	Employee training (average hours)	Metrics and Targets (Section 8.4-C)	[50]
405-1	Diversity and equal opportunity	Metrics and Targets (Section 8.4-A)	[49]
413-1	Engagement with local communities	Real Estate Sustainability (Sections 9.5-9.6)	[58]

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10.9. APPENDIX 9: LIST OF ABBREVIATIONS

Abbreviation	Description
BIM	Building Information Modeling
BIST	Borsa İstanbul
BMS	Building Management System
BREEAM	Building Research Establishment Environmental Assessment Method
CDP	Carbon Disclosure Project
CMB	Capital Markets Board of Türkiye
CRI	Corporate Risk Inventory
CSR	Corporate Social Responsibility
EBITDA	Earnings Before Interest, Taxes, Depreciation, and Amortization
EDRC	Early Detection of Risk Committee
EF	Emission Factor
ESG	Environmental, Social, and Governance
ESRS	European Sustainability Reporting Standards
ETS	Emissions Trading System
EU	European Union
EVÇED	Department of Energy Efficiency and Environment
GHG	Greenhouse Gas
GLA	Gross Leasable Area
GRI	Global Reporting Initiative
GWP	Global Warming Potential
IFRS	International Financial Reporting Standards
IPCC	Intergovernmental Panel on Climate Change
ISO	International Organization for Standardization
LCA	Life Cycle Assessment
LEED	Leadership in Energy and Environmental Design
LPPD	Law on the Protection of Personal Data
LTIFR	Lost Time Injury Frequency Rate
NAV	Net Asset Value
NCV	Net Calorific Value
PDP	Public Disclosure Platform
POA	Public Oversight, Accounting and Auditing Standards Authority
SASB	Sustainability Accounting Standards Board
SBTi	Science Based Targets initiative
SDGs	Sustainable Development Goals
SPP	Solar Power Plant
TAS	Turkish Accounting Standards
TCFD	Task Force on Climate-Related Financial Disclosures
TFRS	Turkish Financial Reporting Standards
TL	Turkish Lira
TSRS	Turkish Sustainability Reporting Standards
TurkStat	Turkish Statistical Institute
WELL	WELL Building Standard
YEKDEM	Renewable Energy Resources Support Mechanism

10.10. APPENDIX 10: INDEPENDENT AUDIT AND ASSURANCE REPORT

YEDİ TEPE Bağımsız Denetim ve Yeminli Mali Müşavirlik A.Ş.

PRAXITY Empowering Business Globally

INDEPENDENT PRACTITIONER'S LIMITED ASSURANCE REPORT ON ÖZAK GAYRİMENKUL YATIRIM ORTAKLIĞI A.Ş. AND ITS SUBSIDIARIES SUSTAINABILITY INFORMATION IN ACCORDANCE WITH TURKISH SUSTAINABILITY REPORTING STANDARDS

To the General Assembly of
Özak Gayrimenkul Yatırım Ortaklığı A.Ş.

We have undertaken a limited assurance engagement on Özak Gayrimenkul Yatırım Ortaklığı A.Ş. (the "Company") and its subsidiaries (collectively referred to as the "Group"), sustainability information for the year ended 31 December 2025 in accordance with Turkish Sustainability Reporting Standards 1 "General Requirements for Disclosure of Sustainability-related Financial Information" and Turkish Sustainability Reporting Standards 2 "Climate Related Disclosures" ("Sustainability Information").

Our assurance engagement does not extend to information in respect of earlier periods or other information linked to the Sustainability Information

Our Limited Assurance Conclusion
Based on the procedures we have performed as described under the 'Summary of the work we performed as the basis for our assurance conclusion' and the evidence we have obtained, nothing has come to our attention that causes us to believe that Group's Sustainability Information for the year ended 31 December 2025 is not prepared, in all material respects, in accordance with Turkish Sustainability Reporting Standards published in the Official Gazette dated 29 December 2023, and numbered 32414(M) and issued by Public Oversight Accounting and Auditing Standards Authority (the "POA") . We do not express an assurance conclusion on information in respect of earlier periods.

Emphasized Matter
As explained in the "Introduction" section of the Sustainability Report, the Group's 2025 Sustainability Report has been prepared in accordance with the transition reliefs available under TSRS 1 and TSRS 2, accordingly, includes disclosures only on climate-related risks and opportunities.

Inherent Limitations in the Preparation of Sustainability Information
All assurance engagements have inherent limitations due to the selective testing of the information under review. Therefore, fraud, errors, or non-compliance may occur and go undetected. Additionally, such non-financial information, like that included in reporting documents, is subject to more inherent limitations than financial information, given the nature and methods used to identify, calculate, sample, or estimate such information.

Our engagement provides limited assurance as defined in Assurance Engagement Standards 3000 and 3410. The activities performed within a limited assurance engagement differ from a reasonable assurance engagement by their nature, timing, and less comprehensiveness. Therefore, the level of assurance obtained within a limited assurance engagement is significantly narrower than within the scope of a reasonable assurance engagement.

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YEDİ TEPE Bağımsız Denetim ve Yeminli Mali Müşavirlik A.Ş.

PRAXITY Empowering Business Globally

Responsibilities of Management and Those Charged with Governance for the Sustainability Information
Management of The Group are responsible for:

• The Group management is responsible for the preparation of the sustainability information in accordance with Turkish Sustainability Reporting Standards;

• Designing, implementing and maintaining internal control over information relevant to the preparation of the Sustainability Information that is free from material misstatement, whether due to fraud or error;

• The Group Management is also responsible for the selection and implementation of appropriate sustainability reporting methods, as well as making reasonable assumptions and developing estimates in accordance with the conditions.

Those charged with governance are responsible for overseeing the Group's sustainability reporting process.

Practitioner's Responsibilities for the Limited Assurance on Sustainability Information
We are responsible for:

• Planning and performing the engagement to obtain limited assurance about whether the Sustainability Information is free from material misstatement, whether due to fraud or error;

• Forming an independent conclusion, based on the procedures we have performed and the evidence we have obtained; and

• Reporting our conclusion to the Directors of Group.

• Perform risk assessment procedures, including obtaining an understanding of internal control relevant to the engagement, to identify where material misstatements are likely to arise, whether due to fraud or error, but not for the purpose of providing a conclusion on the effectiveness of the Group's internal control.

• Design and perform procedures responsive to where material misstatements are likely to arise in the sustainability information. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Misstatements can arise from fraud or error. Misstatements are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of Sustainability Information.

As we are engaged to form an independent conclusion on the Sustainability Information as prepared by management, we are not permitted to be involved in the preparation of the Sustainability Information as doing so may compromise our independence.

YEDİ TEPE Bağımsız Denetim ve Yeminli Mali Müşavirlik A.Ş.

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Professional Standards Applied
We performed a limited assurance engagement in accordance with Standard on Assurance Engagements 3000 (Revised) Assurance Engagements other than Audits or Reviews of Historical Financial Information and, in respect of greenhouse gas emissions included in the Sustainability Information, in accordance with Standard on Assurance Engagements 3410 Assurance Engagements on Greenhouse Gas Statements, issued by POA.

Our Independence and Quality Management
We have complied with the independence and other ethical requirements of the Ethical Rules for Independent Auditors (including Independence Standards) (the "Ethical Rules") issued by the POA, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior. Our firm applies Standard on Quality Management 1 and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements. Our work was carried out by an independent and multidisciplinary team including assurance practitioners, sustainability and risk experts. We used the work of experts, in particular, to assist with determining the reasonableness of Group's information and assumptions related to climate and sustainability risks and opportunities. We remain solely responsible for our assurance conclusion.

Summary of the Work We Performed as the Basis for our Assurance Conclusion
We are required to plan and perform our work to address the areas where we have identified that a material misstatement of the Sustainability Information is likely to arise. The procedures we performed were based on our professional judgment. In carrying out our limited assurance engagement on the Sustainability Information, we:

• Inquiries were conducted with the Group's key senior personnel to understand the processes in place for obtaining the Sustainability Information for the reporting period

• The Group's internal documentation was used to assess and review the information related to sustainability;

• Considered the presentation and disclosure of the Sustainability Information.

• Through inquiries, obtained an understanding of Group's control environment, processes and information systems relevant to the preparation of the Sustainability Information, but did not evaluate the design of particular control activities, obtain evidence about their implementation or test their operating effectiveness;

• Evaluated whether Group's methods for developing estimates are appropriate and had been consistently applied, but our procedures did not include testing the data on which the estimates are based or separately developing our own estimates against which to evaluate Group's estimates;

• Obtained understanding of process for identifying risks and opportunities that are financially significant, along with the Group's sustainability reporting process.

The procedures in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Yeditepe Bağımsız Denetim ve Yeminli Mali Müşavirlik A.Ş.
(Associate Member of Praxity AISBL)

Hasan Ersin,
Partner
İstanbul, 20 October 2026

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