

EREĞLİ DEMİR VE ÇELİK FABRİKALARI T.A.Ş. SUSTAINABILITY REPORT							
		COMPLIANCE STATUS				EXPLANATION	REPORT / LINK REGARDING THE PUBLICLY DISCLOSED INFORMATION
		YES	NO	PARTIAL	NOT APPLICABLE		
A. General Principles							
A1. Strategy, Policy and Goals							
A1.1	The preferred environmental, social and corporate governance (ESG) issues, risks and opportunities have been determined by the Board of Directors.	X				Risks and opportunities within the scope of ESG issues have been determined.	https://www.oyakmadenmetalurji.com.tr/Sites/1/upload/files/2021_Integrated_Annual_Report_22-5017.pdf
	The ESG policies (e.g. Environmental Policy, Energy Policy, Human Rights and Labour Rights Policy) have been set out by the Board of Directors and disclosed to public.	X				Our policies within the scope of ESG issues have been determined and disclosed to the public on the company website.	https://www.erdemir.com.tr/corporate/management-systems-policy/
A1.2	The short-term and long-term ESG goals have been disclosed to public.	X				Strategy and objectives are explained in the "Strategic Approach" section of the integrated report.	2021 Integrated Annual Report / Strategic Approach (Page 20)
A2. Execution/Supervision							
A2.1	The committees and/or boards responsible for the supervision of ESG policies and the seniors directors to execute the ESG issues have been disclosed to public including their duties.	X				Departments such as Strategic Planning and Sustainability, Occupational Safety and Environment etc., which are responsible for the execution of ESG policies, are included in the integrated report.	https://www.oyakmadenmetalurji.com.tr/Sites/1/upload/files/2021_Integrated_Annual_Report_22-5017.pdf
	The activities carried out within the scope of the policies by the responsible committee and/or department have been reported to the Board of Directors at least once a year.	X				The duties of the relevant departments include reporting their activities which are within the scope of ESG policies to the Board of Directors at least once a year.	https://www.oyakmadenmetalurji.com.tr/Sites/1/upload/files/2021_Integrated_Annual_Report_22-5017.pdf
A2.2	The action plan in accordance with the ESG goals have been formed and disclosed to public.	X				The investments and activities planned in line with the targets are explained in the integrated annual report.	https://www.oyakmadenmetalurji.com.tr/Sites/1/upload/files/2021_Integrated_Annual_Report_22-5017.pdf
A2.3	The key performance indicators regarding the ESG and the achievement rates per years have been disclosed to public.	X				Key performance indicators have been determined and detailed follow-ups are carried out within the company on a daily, monthly and annual basis. Indicators that come to the fore are presented in the Environmental and Social Performance Indicators section of our integrated annual report.	2021 Integrated Annual Report / Social and Environmental Performance Indicators (Page 114)
A2.4	The improvement activities for sustainability performance regarding business processes or product and services have been disclosed to public.	X				In the integrated report, activities to improve the sustainability performance of products and services have been disclosed.	https://www.oyakmadenmetalurji.com.tr/Sites/1/upload/files/2021_Integrated_Annual_Report_22-5017.pdf
A3. Reporting							
A3.1	The annual report covers the sustainability performance, KPIs and actions understandable, right and qualified.	X				Sustainability performance is constantly reviewed and reported. Information on sustainability activities is explained in the relevant sections of the Integrated report.	https://www.oyakmadenmetalurji.com.tr/Sites/1/upload/files/2021_Integrated_Annual_Report_22-5017.pdf
A3.2	The information on the activities implemented in line with the United Nations (UN) 2030 Sustainable Development Goals have been disclosed to public.	X				Our activities' connection and contribution to the SDGs are explained in the "Strategic Approach" and "Prioritization Analysis" sections of the integrated report.	2021 Integrated Annual Report / Strategic Approach (Page 20)
A3.3	The lawsuits in progress against the Company regarding the ESG issues that effect the material business lines and the legal sanctions in regard of the sustainability policies have been disclosed to public.			X		Lawsuits brought against and / or concluded to our company, those that are deemed necessary / important are disclosed on the Public Disclosure Platform (PDP)	https://www.kap.org.tr/en/sirket-bilgileri/ozet/944-eregli-demir-ve-celik-fabrikalari-t-a-s
A4. Verification							
A4.1	The KPI measurements have been verified by an independent third and disclosed to public.			X		Some of the parameters related to sustainability are approved by the verifier (independent third party) and shared with the Ministry.	https://www.oyakmadenmetalurji.com.tr/Sites/1/upload/files/2021_Integrated_Annual_Report_22-5017.pdf
B. Environmental Principles							
B1	The company has disclosed its policies and practices on environmental management, action plans, environmental management systems (known as ISO 14001 standard) and programmes.	X				Policies and practices, action plans, environmental management systems and programs created within the scope of environmental management are explained in the integrated report.	https://www.oyakmadenmetalurji.com.tr/Sites/1/upload/files/2021_Integrated_Annual_Report_22-5017.pdf

B2	The scope, period, date and the constraints of conditions of the environmental reporting regarding environmental management have been disclosed to public.	X				There is information about the period, date, limits and limitations of the environmental report included in the integrated report.	2021 Integrated Annual Report / About the Report (Page 1)
B3	Presented at A2.1.						
B4	The environmental KPIs counted for remuneration criteria for stakeholders (e.g. board members, executives and employees) within frame of the performance incentives have been disclosed to public.	X				Employee goals also include environmental goals. Realizations of the targets are supported by incentives and are explained in the integrated report.	2021 Integrated Annual Report / Employees (Page 102)
B5	The integration of the environmental difficulties, which are preferably determined, with the business goals and strategy have been disclosed to public.	X				Environmental problems and risks were taken into account in the analyzes and studies carried out while determining the targets and strategies, and they are explained in the Risk Management section of the integrated report.	2021 Integrated Annual Report / Risk Management (Page 59)
B6	Presented at A2.4.						
B7	The integration of environmental management issues covering the customers and suppliers throughout the value chain of the company including the operational process with the business model and strategy have been disclosed to public.	X				Our stakeholder relations are explained in our integrated report.	2021 Integrated Annual Report / Risk Management (Page 59)
B8	The cooperation with the non-governmental organizations and the environmental institutions and taking (or not) a part of the policy-making processes with those institutions have been disclosed to public.	X				It is explained in the "Corporate Memberships" section of the integrated report.	2021 Integrated Annual Report / Corporate Memberships (Page 117)
B9	The environmental figures (Greenhouse gas emissions (Scope-1 (Direct), Scope-2 (Energy indirect), Scope-3 (Other indirect), air quality, energy management, water and waste water management, waste management, biodiversity impacts) and the environmental impacts have been disclosed to public with periodic comparison.			X		Environmental indicators are explained in our integrated annual report. Information on Greenhouse Gas is shared with the Ministry of Environment, Urbanization and Climate Change.	2021 Integrated Annual Report / Environmental Performance Indicators (Page 116)
B10	The standard, protocol, methodology and the base year details for collection and calculation of the data have been disclosed to public.			X		The standard and methodology used in the integrated annual report are mentioned in general terms.	https://www.ovakmadenmetalurji.com.tr/Sites/1/upload/files/2021_Integrated_Annual_Report_22-5017.pdf
B11	The comparable increase or decrease rates with the previous years have been disclosed to public in the current period's report.	X				Prominent indicators are presented in the "Environmental Performance Indicators" section of our integrated annual report in comparison with previous years.	2021 Integrated Annual Report / Environmental Performance Indicators (Page 116)
B12	The short-term and long-term targets are determined to decrease the environmental impacts; the called targets and the progress status in comparison to the previous years' targets have been disclosed to public.			X		Although the targets are followed within the company, numerical targets are not included in the integrated annual report.	https://www.ovakmadenmetalurji.com.tr/Sites/1/upload/files/2021_Integrated_Annual_Report_22-5017.pdf
B13	The strategy for fight against climate crises is set out and the action plan has been disclosed to public.			X		Activities carried out in the context of combating the climate crisis are mentioned in our integrated annual report, but the ongoing road map studies are not included in the report	https://www.ovakmadenmetalurji.com.tr/Sites/1/upload/files/2021_Integrated_Annual_Report_22-5017.pdf
B14	The programmes or procedures to prevent or to decrease to the minimum level of the negative environmental effects of the products and/or services have been disclosed to public.	X				The efforts spent in order to prevent or minimize the negative potential impacts of our products on the environment are explained in our integrated annual report.	https://www.ovakmadenmetalurji.com.tr/Sites/1/upload/files/2021_Integrated_Annual_Report_22-5017.pdf
	The actions taken to make the third parties' (e.g. supplier, subcontractor, dealer, etc.) decrease their greenhouse gas emission figures have been disclosed to public.			X		Actions to reduce greenhouse gas emissions of third parties are in progress but have not been disclosed to the public yet.	https://www.ovakmadenmetalurji.com.tr/Sites/1/upload/files/2021_Integrated_Annual_Report_22-5017.pdf
B15	The environmental benefits/gainings and cost savings provided by the initiatives/projects to decrease the environmental impacts have been disclosed to public.	X				Important projects and actions are included in our integrated annual report, especially energy savings in the context of energy efficiency are explained.	https://www.ovakmadenmetalurji.com.tr/Sites/1/upload/files/2021_Integrated_Annual_Report_22-5017.pdf
B16	Energy consumption (natural gas, diesel, gas, LPG, coal, electricity, heating, cooling, etc.) figures as Scope-1 and Scope-2 have been disclosed to public.			X		Our total energy consumption is disclosed in the integrated report.	2021 Integrated Annual Report / Environmental Performance Indicators (Page 116)
B17	The information about the produced electricity, heat, steam and cooling for the reporting period have been disclosed to public.			X		Within the scope of the "Energy Efficiency Law" numbered 5627, the energy production and consumption data of the previous year are entered annually as data in the "Energy Efficiency Portal" according to the criteria determined by the Department of Energy Efficiency and Environment of the Ministry of Energy and Natural Resources	https://www.ovakmadenmetalurji.com.tr/Sites/1/upload/files/2021_Integrated_Annual_Report_22-5017.pdf
B18	The actions taken to increase renewable energy consumption, transit to zero or low carbon electricity have been disclosed to public.	X				Our renewable energy works are explained in the integrated report.	https://www.ovakmadenmetalurji.com.tr/Sites/1/upload/files/2021_Integrated_Annual_Report_22-5017.pdf

B19	The renewable energy production and consumption figures have been disclosed to public.	X				Relevant datas are disclosed in the integrated report.	https://www.oyakmadenmetalurji.com.tr/Sites/1/upload/files/2021_Integrated_Annual_Report_22-5017.pdf
B20	Energy productivity projects have been carried out and the decrease rates on energy consumption and emission based on those projects have been disclosed to public.	X				It is explained in the "Environmental Performance" section of the integrated report.	2021 Integrated Annual Report / Environmental Performance Indicators (Page 116)
B21	Water consumption, underground or aboveground drawn water, recycled or discharged water figures, sources and procedures have been disclosed to public.	X				It is presented in comparison with previous years in the Environmental Performance Indicators section of our integrated annual report.	2021 Integrated Annual Report / Environmental Performance Indicators (Page 116)
B22	It has been disclosed to public if the operations or activities included to any carbon pricing system (Emission Trading System, Cap & Trade or Carbon Tax) or not.				X	No taxation system has come into force in our country. The information that we participate in Partnership for Market Readiness (PMR) studies conducted in our country is given in the integrated annual report. Erdemir Romania's activities are included in the EU ETS system and are reported.	
B23	The information on accumulated or purchased carbon credit in the reporting period has been disclosed to public.				X	No taxation system has come into force in our country. The information that we participate in Partnership for Market Readiness (PMR) studies conducted in our country is given in the integrated annual report. Erdemir Romania's activities are included in the EU ETS system and are reported.	
B24	The details have been disclosed to public if there is a carbon pricing mechanism at the company.				X	No taxation system has come into force in our country. The information that we participate in Partnership for Market Readiness (PMR) studies conducted in our country is given in the integrated annual report. Erdemir Romania's activities are included in the EU ETS system and are reported.	
B25	The platforms, which the environmental figures of the company are announced, have been disclosed to public.	X				The platforms such as EIA public participation meetings, website, social media, one-to-one meetings with suppliers, sectoral organizations, associations and NGOs, collaborations, memberships, participation in working groups are described in the integrated report	https://www.oyakmadenmetalurji.com.tr/Sites/1/upload/files/2021_Integrated_Annual_Report_22-5017.pdf
C. Social Principles							
C1. Human Rights and Labour Rights							
C1.1	The Human Rights and Labour Rights Policy has been set out covering the United Nations Universal Declaration of Human Rights and the International Labour Organization principles, the responsible directors for execution of the policy are assigned and disclosed to public.	X				Our commitment is stated in the code of ethics and working principles and shared on our website.	https://www.erdemir.com.tr/Sites/1/upload/files/Erdemir_Etik_Kurallar_Kitapcigi_ING-1252.pdf
C1.2	The labour rights policy covers the fair workforce, improving work conditions, women's employment and inclusion (no discrimination on gender, race, religion, language, marital status, ethnicity, sexual orientation, gender identity, family responsibilities, trade union activities, political view, disability, social and culturel differences, etc.) considering the supply and value chain impacts.	X				Our policy is stated in the code of ethics and working principles and shared on our website.	https://www.erdemir.com.tr/Sites/1/upload/files/Erdemir_Etik_Kurallar_Kitapcigi_ING-1252.pdf
C1.3	The measures taken throughout the value chain to watch over the susceptible segments to certain economic, environmental, social factors (e.g. low income group, women, etc.) or minority rights/opportunity equality.	X				It is explained in the relevant sections of our integrated report.	https://www.oyakmadenmetalurji.com.tr/Sites/1/upload/files/2021_Integrated_Annual_Report_22-5017.pdf
C1.4	The preventive and improver practices on discrimination, inequality, human rights violation, forced labour, and child labour have been disclosed to public.				X	There are internal (in-company) reports.	Internal (in-company) reports
C1.5	The labour rights policy covers investment in employees (training, improvement policies), remuneration, side rights, right to unionize, work/life balance and skill management issues.	X				It is explained in the relevant sections of our integrated report.	https://www.oyakmadenmetalurji.com.tr/Sites/1/upload/files/2021_Integrated_Annual_Report_22-5017.pdf
	The mechanism regarding the employee complaints and the dispute resolution process is determined.	X				Mechanisms for the resolution of employee complaints and disputes have been established, and dispute resolution processes have been specified in the code of ethics and working principles.	https://www.erdemir.com.tr/Sites/1/upload/files/Erdemir_Etik_Kurallar_Kitapcigi_ING-1252.pdf
	The reported employee satisfaction activities in the period have been disclosed to public.	X				It is explained in the relevant sections of our integrated report.	https://www.oyakmadenmetalurji.com.tr/Sites/1/upload/files/2021_Integrated_Annual_Report_22-5017.pdf
C1.6	Occupational Health and Safety Policy has been set out and disclosed to public.	X				Occupational health and safety policies have been established and shared on our website.	https://www.erdemir.com.tr/corporate/management-systems-policy/
	The measures taken to prevent the work accidensts, health protection and accident statistics have been disclosed to public.	X				It is explained in the Occupational Health and Safety section of the integrated report.	2021 Integrated Annual Report / Occupational Health and Safety (Page 76)
C1.7	Protection of the personal data and information security policy has been disclosed to public.	X				Personal data protection and data security policies have been established and shared on our website.	https://www.erdemir.com.tr/kurumsal/kisisel-verilerin-korumasi/

C1.8	Code of Ethics has been set out and disclosed to public.	X				Ethics policy has been established and shared on our website.	https://www.erdemir.com.tr/Sites/1/upload/files/Erdemir_Etik_Kurallar_Kitapcigi_ING-1252.pdf
C1.9							
C1.10	The informative meetings and training programmes on ESG practices organised for the employees	X				Regular trainings are provided to the employees within the framework of the developmental plans.	https://www.oyakmadenmetalurji.com.tr/Sites/1/upload/files/2021_Integrated_Annual_Report_22-5017.pdf
C2. Stakeholders, International Standards and Initiatives							
C2.1	Customer satisfaction policy covering the management and solution of the customer complaints has been set out and disclosed to public.	X				The customer satisfaction policy regarding the management and resolution of customer complaints has been prepared and explained in the integrated report.	https://www.oyakmadenmetalurji.com.tr/Sites/1/upload/files/2021_Integrated_Annual_Report_22-5017.pdf
C2.2	The information on communication with the stakeholders (whom, topic ve frequency) has been disclosed to public.	X				Details on stakeholder communication are described in the integrated report.	2021 Integrated Annual Report / Stakeholder Relations (Page 30)
C2.3	The international reporting standards adopted have been disclosed to public.	X				Adopted international reporting standards are explained in the integrated report.	https://www.oyakmadenmetalurji.com.tr/Sites/1/upload/files/2021_Integrated_Annual_Report_22-5017.pdf
C2.4	The adopted principles, being a signatory or a member of an international institution, committee on sustainability have been disclosed to public.	X				Signatory or member international organizations or principles are publicly disclosed in the integrated report.	2021 Integrated Annual Report / Corporate Memberships (Page 117)
C2.5	Improvement activities have been realized to be included Borsa Istanbul Sustainability Index and/or international index providers' sustainability indices.	X				It is included in the Borsa Istanbul Sustainability Index.	2021 Integrated Annual Report (Page 19)
D. Corporate Governance Principles							
D1	It has been consulted with the stakeholders regarding the determination of the sustainability measures and strategy.	X				Opinions of stakeholders are sought in determining measures and strategies in the field of sustainability.	https://www.oyakmadenmetalurji.com.tr/Sites/1/upload/files/2021_Integrated_Annual_Report_22-5017.pdf
D2	CSR projects, awareness activities and training programmes have been realized to increase the awareness of on sustainability.	X				Studies are carried out to raise awareness on the issue of sustainability and the importance of sustainability through social responsibility projects, awareness activities and trainings.	https://www.isdemir.com.tr/Sites/1/upload/files/2021_Integrated_Annual_Report_22-5188.pdf