

	If the compliance status to the Principles are decided as “Yes” or “Partial” there must be information about the report/link including the public information. Explanations about the compliance to the Principles must be written in “Explanation” column. The extent to which the requested information is presented as consolidated or solo must be stated in the "Explanation" column.	COMPLIANCE STATUS				EXPLANATION	REPORT INFORMATION ON PUBLICLY DISCLOSED INFORMATION (Page number should also be indicated)/LINK
		YES	NO	PARTIAL	NOT RELEVANT		
	A. General Principles						
	A1. Strategy, Policy and Targets						
A1.1	Material environmental, social and corporate governance (ESG) issues, risks and opportunities have been determined by the Company’s board of directors.	X					https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 32-36, 106-107, 109-111) https://yatirimciiliskileri.sabanci.com/en/sustainability/default/Corporate-Governance-and-Sustainability/124/481/0 https://yatirimciiliskileri.sabanci.com/en/images/pdf/sabanci-holding-strategy-presentation-januarv.pdf (pages 23-32)
	ESG Policies (i.e., Environmental Policy, Energy Policy, Human Rights and Labor Policy etc.) have been established and publicly disclosed by the Company’s board of directors.	X					https://yatirimciiliskileri.sabanci.com/en/sustainability/policies/Policies/184/0/0 https://yatirimciiliskileri.sabanci.com/2021-Digital-Annual-Report/pdf/en/sabanci2021.pdf (pages 126-129)
A1.2	Short and long-term targets which have been defined under the ESG policies are disclosed to the public.	X					https://yatirimciiliskileri.sabanci.com/2021-Digital-Annual-Report/pdf/en/sabanci2021.pdf (page 52) https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 29-31, 91)
	A2. Application/Monitoring						
A2.1	The committees and/or departments responsible for the execution of ESG policies and top-level executives in the Company related to ESG issues and their duties have been identified and they are publicly disclosed.	X					https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 32-36, 102-107) https://yatirimciiliskileri.sabanci.com/2021-Digital-Annual-Report/pdf/en/sabanci2021.pdf (pages 53-55)
	The responsible committee / unit reported the activities carried out within the scope of the policies to the Board of Directors at least once a year.	X					https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 32-36)

A4.1	The Company's ESG Key Performance metrics have been verified by an independent third party and publicly disclosed.	X					https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 141-143)
B. Environmental Principles							
B1	The Company has publicly disclosed its policies and practices, action plans, environmental management systems (known by the ISO 14001 standard) and programs in the field of environmental management.			X		It is in some of the group companies. Studies are carried out to ensure full harmonization throughout the Group.	
B2	The scope of the report, reporting period, reporting date, and the limitations regarding the reporting conditions were disclosed to the public regarding the environmental reports prepared regarding information on environmental management.	X					https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (page 2)
B3	Given in A2.1.	X					
B4	Environmental targets included in the reward criteria within the scope of performance incentive systems on the basis based on (such as members of the Board of Directors, managers, and employees) have been disclosed to the public.	X					https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 18, 88)
B5	It has been disclosed to the public that the way of material environmental issues integration into business objectives and strategies.	X					https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 13, 26-31) https://yatirimciiliskileri.sabanci.com/2021-Digital-Annual-Report/pdf/en/sabanci2021.pdf (pages 48-52) https://yatirimciiliskileri.sabanci.com/en/images/pdf/cdp-climate-change-2022.pdf (pages 19, 20, 21-23) https://yatirimciiliskileri.sabanci.com/en/images/pdf/sabanci-holding-strategy-presentation-january.pdf (pages 23-33)
B6	Given in A2.4.	X					
B7	It has been publicly disclosed how environmental issues are managed and integrated into business objectives and strategies throughout the Company's value chain; including the operational process, suppliers and customers.	X					https://yatirimciiliskileri.sabanci.com/en/images/pdf/cdp-climate-change-2022.pdf (pages 68, 69) https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL-Policy-ENG.pdf (pages 4, 10-16)
B8	Whether relevant organizations and non-governmental organizations on the environment are involved in the policy-making processes and the	X					https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 27, 28, 99, 102-104, 117)

	collaborations with these institutions and organizations were disclosed to the public.						https://yatirimciiliskileri.sabanci.com/2021-Digital-Annual-Report/pdf/en/sabanci2021.pdf (pages 26-29, 48, 49) https://yatirimciiliskileri.sabanci.com/en/images/pdf/cdp-climate-change-2022.pdf (pages 68, 69, 73)
B9	Environmental indicators (Greenhouse gas emissions (Scope-1 (Direct), Scope-2 (Energy indirect), Scope-3 (Other indirect), air quality, energy management, water and wastewater management, waste management, biodiversity impacts) information about the impacts of the Company has been disclosed to the public on a comparable basis periodically.	X				Some of the indicators (i.e., NOx) are irrelevant for some of the Group companies. The remaining parts are explained in the public resources.	https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 118-120) https://yatirimciiliskileri.sabanci.com/en/images/pdf/cdp-climate-change-2022.pdf (pages 43-56)
B10	Details of the standard, protocol, methodology, and base year used to collect and calculate data have been publicly disclosed.	X					https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 121-140) https://yatirimciiliskileri.sabanci.com/en/images/pdf/cdp-climate-change-2022.pdf (pages 43-54)
B11	In comparison with previous years, the increase or decrease of environmental indicators for the reporting year has been disclosed to the public.	X					https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 4-6, 13, 20-31, 38-55) https://yatirimciiliskileri.sabanci.com/en/images/pdf/cdp-climate-change-2022.pdf (pages 48-54)
B12	Short and long-term targets have been determined to reduce the Company's environmental impacts, and the progress of these targets and the targets determined in previous years has been disclosed to the public.	X					https://yatirimciiliskileri.sabanci.com/en/images/pdf/cdp-climate-change-2022.pdf (pages 20-24) https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 29-31)
B13	A strategy to combat the climate crisis has been created and the planned actions have been publicly announced.	X					https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 4-6, 13, 20-31, 38-55) https://yatirimciiliskileri.sabanci.com/en/images/pdf/cdp-climate-change-2022.pdf (pages 19-22) https://yatirimciiliskileri.sabanci.com/2021-Digital-Annual-Report/pdf/en/sabanci2021.pdf (pages 48-52)
B14	Programs or procedures have been established and disclosed to the public in order to prevent or minimize the potential negative impact of products and/or services on the environment.	X					https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 67-72) https://yatirimciiliskileri.sabanci.com/en/images/pdf/cdp-climate-change-2022.pdf (pages 41-43)
	Actions have been taken to reduce greenhouse gas emissions of third	X					https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL-Policy-ENG.pdf (page 12)

	parties (i.e., suppliers, subcontractors, dealers, etc.) and these actions have been disclosed to the public.					
B15	The environmental benefits and cost savings of initiatives and projects aimed at reducing environmental impacts have been disclosed to the public.	X				https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 69, 73, 118) https://yatirimciiliskileri.sabanci.com/en/images/pdf/cdp-climate-change-2022.pdf (pages 41-43)
B16	Energy consumption (natural gas, diesel, gasoline, LPG, coal, electricity, heating, cooling, etc.) data are publicly disclosed as Scope-1 and Scope-2.	X				https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 118-120) https://yatirimciiliskileri.sabanci.com/en/images/pdf/cdp-climate-change-2022.pdf (pages 43-56)
B17	Public disclosure was made about the electricity, heat, steam and cooling produced in the reporting year.	X				https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 118-120) https://yatirimciiliskileri.sabanci.com/en/images/pdf/cdp-climate-change-2022.pdf (pages 56-61)
B18	Actions on increasing the use of renewable energy and transition to zero or low carbon electricity have been made and publicly announced.	X				https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 18, 19, 38, 42, 118) https://yatirimciiliskileri.sabanci.com/en/images/pdf/cdp-climate-change-2022.pdf (pages 35-37, 57)
B19	Renewable energy production and consumption data is publicly disclosed.	X				https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (page 118) https://yatirimciiliskileri.sabanci.com/en/images/pdf/cdp-climate-change-2022.pdf (page 57)
B20	Energy efficiency projects have been carried out and the amount of energy consumption and emission reduction achieved through energy efficiency projects has been disclosed to the public.	X				https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 18, 19, 38, 42, 118) https://yatirimciiliskileri.sabanci.com/en/images/pdf/cdp-climate-change-2022.pdf (pages 35-37, 57)
B21	Water consumption, and if any amounts of water drawn, recycled and discharged from underground or above ground, sources and procedures are publicly disclosed.	X				https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (page 118)
B22	It has been publicly disclosed whether the Company's operations or activities are included in any carbon pricing system (Emissions Trading System, Cap & Trade or Carbon Tax).	X				https://yatirimciiliskileri.sabanci.com/en/images/pdf/cdp-climate-change-2022.pdf (pages 63-65)

B23	Information on carbon credits gained or purchased during the reporting period has been disclosed to the public.	X					https://yatirimciiliskileri.sabanci.com/en/images/pdf/cdp-climate-change-2022.pdf (pages 64, 65)
B24	If carbon pricing is applied within the Company, the details are disclosed to the public.	X					https://yatirimciiliskileri.sabanci.com/en/images/pdf/cdp-climate-change-2022.pdf (pages 64, 65)
B25	The platforms where the Company discloses its environmental information are publicly disclosed.	X					https://yatirimciiliskileri.sabanci.com/en/sustainability/default/Corporate-Governance-and-Sustainability/124/481/0 https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf https://yatirimciiliskileri.sabanci.com/2021-Digital-Annual-Report/pdf/en/sabanci2021.pdf https://yatirimciiliskileri.sabanci.com/en/images/pdf/cdp-climate-change-2022.pdf https://yatirimciiliskileri.sabanci.com/en/images/pdf/cdp-water-security-2022.pdf https://yatirimciiliskileri.sabanci.com/en/financial-reports-publications/liste-report/Corporate-Governance-Compliance-Report/165/0/0
C. Social Principles							
C1. Human Rights ve Employees Rights							
C1.1	The Corporate Human Rights and Employee Rights Policy has been established in a way to cover the Universal Declaration of Human Rights, ILO Conventions ratified by Turkey and other relevant legislation, those responsible for the execution of the policy have been determined and both the policy and responsible departments from the policies have been disclosed to the public.	X					https://www.sabanci.com/en/management-approach/sabanci-group-code-of-business-ethics https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (page 90) https://yatirimciiliskileri.sabanci.com/en/sustainability/detail/Corporate-Social-Responsibility-Policy-and-Principles/166/462/0
C1.2	Considering the effects of supply and value chain; fair workforce, improvement of labor standards, women's employment, and inclusion issues (gender, race, religion, language, marital status, ethnic identity, sexual orientation, gender identity, family responsibilities, union activities, political opinion, disability, social and	X					https://www.sabanci.com/en/management-approach/sabanci-group-code-of-business-ethics https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 90-93) https://yatirimciiliskileri.sabanci.com/2021-Digital-Annual-Report/pdf/en/sabanci2021.pdf (page 43)

	cultural differences, etc., such as non-discrimination) are included in the Company's policy on employee rights.						https://kariyer.sabanci.com/en/human-capital
C1.3	Measures taken along the value chain regarding the observance of certain economic, environmental, social factors (low-income groups, women, etc.) or minority rights/equality of opportunity have been publicly disclosed.	X					https://www.sabanci.com/en/social-responsibility/our-commitments/womens-empowerment-principles https://yatirimciiliskileri.sabanci.com/2021-Digital-Annual-Report/pdf/en/sabanci2021.pdf (pages 43, 47) https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 80-83, 90-93)
C1.4	Developments regarding preventive and corrective practices against discrimination, inequality, human rights violations, forced and child labor have been disclosed publicly.	X					https://www.sabanci.com/en/management-approach/sabanci-group-code-of-business-ethics https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 90-93) https://yatirimciiliskileri.sabanci.com/en/sustainability/detail/Corporate-Social-Responsibility-Policy-and-Principles/166/462/0 https://kariyer.sabanci.com/en/human-capital https://yatirimciiliskileri.sabanci.com/2021-Digital-Annual-Report/pdf/en/sabanci2021.pdf (pages 126, 127) https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL-Policy-ENG.pdf (page 14)
C1.5	Investments in employees (training and development policies), compensation, recognized fringe benefits, unionization right, work/life balance solutions and talent management are included in the employee rights policy.	X					https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 80-89, 113, 114) https://kariyer.sabanci.com/en/human-capital https://yatirimciiliskileri.sabanci.com/2021-Digital-Annual-Report/pdf/en/sabanci2021.pdf (pages 126, 127) https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL-Policy-ENG.pdf (page 14) https://www.sabanci.com/en/management-approach/sabanci-group-code-of-business-ethics
	Disagreement resolution processes have been determined by establishing mechanisms for employee complaints and resolution of disputes.	X					https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 113, 114) https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL-Policy-ENG.pdf (page 16)

	Activities conducted within the reported period to ensure employee satisfaction were disclosed publicly.	X					https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 80-89, 113, 114) https://yatirimciiliskileri.sabanci.com/2021-Digital-Annual-Report/pdf/en/sabanci2021.pdf (pages 126, 127)
C1.6	Occupational health and safety policies have been established and disclosed publicly.	X					https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 94, 95, 120) https://yatirimciiliskileri.sabanci.com/en/sustainability/detail/Health-and-Safety-Policy/415/1430/0
	Measures taken to prevent occupational incidents and protect health and incident statistics have been disclosed publicly.	X					https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (page 120)
C1.7	Personal data protection and data security policies have been established and disclosed publicly.	X					https://www.sabanci.com/en/data-protection-law https://www.sabanci.com/en/privacy-statement
C1.8	Ethics policy has been established and disclosed publicly.	X					https://www.sabanci.com/en/management-approach/sabanci-group-code-of-business-ethics https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 113, 114)
C1.9							
C1.10	Informative meetings and training programs have been organized for employees on ESG policies and activities.	X					https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (page 83)
C2. Stakeholders, International Standards and Initiatives							
C2.1	The customer satisfaction policy regarding the management and resolution of customer complaints has been prepared and disclosed publicly.				X	This metric is not relevant for Sabanci Holding. Some group companies are publishing.	
C2.2	Information about the communication with stakeholders (which stakeholder, subject and frequency) is publicly disclosed.	X					https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 14, 26, 28)
C2.3	International reporting standards adopted in reporting are explained.	X					https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (page 2)
C2.4	Principles adopted in relation to sustainability, international organizations, committees and principles of which the Company is a	X					https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 2, 117) https://www.unglobalcompact.org/what-is-gc/participants/4724-H-O-Sabanci-Holding-A-S

	signatory or member are disclosed publicly.						https://www.sabanci.com/en/social-responsibility/our-commitments/womens-empowerment-principles
C2.5	Improvements were made and studies were carried out to be included in the sustainability indices of Borsa Istanbul and/or international indices providers.	X					https://yatirimciiliskileri.sabanci.com/en/images/pdf/sabanci-holding-strategy-presentation-january.pdf (page 13) https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (page 26, 67) https://yatirimciiliskileri.sabanci.com/2021-Digital-Annual-Report/pdf/en/sabanci2021.pdf (page 10) https://yatirimciiliskileri.sabanci.com/en/sustainability/default/Corporate-Governance-and-Sustainability/124/481/0
D. Corporate Governance Principles							
D1	Stakeholders' opinions were consulted in determining the measures and strategies on sustainability.	X					https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 26, 28, 35) https://yatirimciiliskileri.sabanci.com/2021-Digital-Annual-Report/pdf/en/sabanci2021.pdf (pages 130-139)
D2	Social responsibility projects, awareness activities and trainings have been carried out to raise awareness about sustainability and its importance.	X					https://www.sabanci.com/en/social-responsibility/sabanci-volunteers/what-is-sabanci-volunteers-programme https://yatirimciiliskileri.sabanci.com/en/images/pdf/SAHOL21-Sur-ENG-Final-220822.pdf (pages 56-62) https://yatirimciiliskileri.sabanci.com/2021-Digital-Annual-Report/pdf/en/sabanci2021.pdf (pages 56-59)