



APPENDIX-6: Sustainability Principles Compliance Framework Table

COMPLIANCE STATUS						
	YES	NO	PARTIAL	NOT RELEVANT	DESCRIPTION	REPORTING INFORMATION REGARDING PUBLICLY DISCLOSED DATA /LINK
A. General Principles						
A1. Strategies, Policies and Goals						
A1.1	The Board of Directors determines environmental, social and governance (ESG) material issues, risks and opportunities.	+				Turkcell Sustainability Management and Involvement of Senior Management (p.45) Operational Risks (p.80)
A1.2	The Board of Directors determines and publicly disclose ESG Policies (Ex: Environmental Policy, Energy Policy, Human Rights Policy and HR Policy).	+				Turkcell Sustainability Management and Involvement of Senior Management (p.45) www.turkcell.com.tr/en/aboutus/corporate-social-responsibility/sustainability
A1.2	It determines and publicly discloses its Short and long-term goals regarding ESG policies were determined and publicly disclosed.	+				Inclusive Positive Imprint (p.108,132,140,154) Positive Imprint to the Environment (p.182)
A2. Implementation/Monitoring						
A2.1	The Partnership determines and publicly discloses the committees/units responsible for the implementation of ESG policies, Partnership's the most senior responsibles regarding ESG issues and their duties.	+				Turkcell Sustainability Management and Involvement of Senior Management (p.45)
A2.1	Responsible committees and/or units report activities conducted in line with policies to the Board of Directors at least once during the year.	+				Turkcell Sustainability Management and Involvement of Senior Management (p.45)
A2.2	The Partnership develops and publicly discloses implementation and action plans in line with the short- and long-term ESG goals.	+				Turkcell Sustainability Management and Involvement of Senior Management (p.45) Turkcell Sustainability Strategy: Positive Imprint in Sustainability (p.48-49) Human Capital (p.112-113) Intellectual Capital (p.140) Social Capital (p.154) Natural Capital (p.182-193)
A2.3	Partnership publicly discloses ESG Key Performance Indicators (KPI) and their degree of achievement on a yearly basis.	+				Inclusive Positive Imprint (p.108,132,140,154) Manufactured Capital (p.132) Intellectual Capital (p.140) Social Capital (p.154) Positive Imprint to the Environment (p.182)
A2.4	The partnership publicly discloses sustainability performance improvement activities regarding business processes or products and services.	+				Manufactured Capital (p.133-139) Intellectual Capital (p.141-153) Social Capital (p.155-166) Natural Capital (p.182-193)
A3. Reporting						
A3.1	The Partnership discloses information on sustainability performance, goals and actions within the annual report in a clear, accurate and complete manner.	+				Turkcell Sustainability Strategy: Positive Imprint in Sustainability (p.48-49) Turkcell Value Creation Process (p.56-57) Human Capital (p.112-113) Manufactured Capital (p.132) Intellectual Capital (p.140) Social Capital (p.154) Positive Imprint to the Environment (p.182-184)
A3.2	Partnership publicly discloses information on which of the United Nations (UN) 2030 Sustainable Development Goals its activities are related to.	+				Supported Sustainable Development Goals (p.50-51)
A3.3	Partnership publicly discloses lawsuits filed and/or concluded against and which are significant in terms of ESG policies and/or can significantly impact company's activities.	+				Competition Management (p.77) Consolidated Financial Statement Footnotes (p.313-325)
A4. Verification						
A4.1	Partnership's ESG Key Performance measurements are verified by an independent third party and publicly disclosed.			+	GHG emissions data disclosed in the report have been verified by an independent audit firm.	Greenhouse Gas Emissions (p.186)

COMPLIANCE STATUS						
	YES	NO	PARTIAL	NOT RELEVANT	DESCRIPTION	REPORTING INFORMATION REGARDING PUBLICLY DISCLOSED DATA /LINK
B. Environmental Principles						
B1	The partnership publicly discloses policies and practices, action plans regarding environmental management and environmental management systems (known as ISO 14001 standard) and programs.	+				Environmental Management (p.183)
B2	The Partnership publicly discloses limitations for reporting scope, reporting term, reporting date and conditions regarding environmental reports prepared for sharing information on environmental management.	+				About the Report (p.28)
B3	Disclosed in A2.1.	+				
B4	The environmental targets that are included in the performance incentive systems on a stakeholder basis (such as board members, executives, and employees) have been publicly disclosed.	+				Environmental Management (p.183-184)
B5	The partnership publicly discloses how the prioritized environmental issues have been integrated into business objectives and strategies.	+				Turkcell Sustainability Strategy: Positive Imprint in Sustainability (p.48-49) Natural Capital (p.180-184)
B6	Disclosed in A2.4.					
B7	The Partnership publicly discloses how environmental issues are managed and integrated into business objectives and strategies throughout the partnership value chain, including suppliers and customers as well as the operational process.	+				Value-Driven, Responsible Supply Chain Management (p.168-169) Natural Capital (p.180-184, 191)
B8	The Partnership publicly discloses its involvement in policy-making processes of environmental organizations and NGOs and cooperation established with these institutions.	+				Climate Change (p.185)
B9	The Partnership publicly discloses periodically comparable data on environmental impacts in the light of environmental indicators (GHG emissions (Scope-1(Direct), Scope-2 (Energy indirect), Scope-3(Other indirect)), air quality, energy management, water and wastewater management, waste management, biodiversity impacts).	+				Natural Capital (p.186, 187, 190, 192, 193)
B10	The Partnership publicly discloses standard, protocol, methodology, and base year details used to collect and calculate its data.	+				Natural Capital (p.183)
B11	The Partnership publicly discloses increase or decrease in environmental indicators for the reporting year in comparison with previous years.	+				Natural Capital (p.182, 186, 187, 190, 192, 193)
B12	The Partnership sets short and long-term goals for reducing its environmental impacts and publicly discloses progress in these goals in comparison with goals set for the previous years.	+				Positive Imprint to the Environment (p.182)
B13	The partnership set a strategy for fighting with climate crisis and publicly discloses actions planned.	+				Climate Change (p.180-181, 185)
B14	The Partnership establishes and publicly discloses programs or procedures in order to avoid or to minimize potential negative impacts of products and/or services.	+				Turkcell Energy Solutions (p.188)
	The Partnership takes and publicly discloses actions to enable third parties (ex: suppliers, contractors, dealers, etc) decrease their GHG emissions.	+				Turkcell Energy Solutions (p.188)



COMPLIANCE STATUS						
	YES	NO	PARTIAL	NOT RELEVANT	DESCRIPTION	REPORTING INFORMATION REGARDING PUBLICLY DISCLOSED DATA /LINK
B15	+					Energy Efficiency (p.189)
B16	+					Energy Management (p.187)
B17	+					Energy Management (p.187)
B18	+					Turkcell Energy Solutions (p.188)
B19	+					Turkcell Energy Solutions (p.188)
B20	+					Energy Efficiency (p.189)
B21	+					Water Management (p.170)
B22	+					2022 CDP Report
B23	+					Greenhouse Gas Emissions (p.186)
B24	+					2022 CDP Report
B25	+					2022 CDP Report
C. Social Principles						
C1. Human Rights and Labour Rights						
C1.1	+					Human Rights, Business Ethics and Common Values (p.74-75)
C1.2	+					Human Rights, Business Ethics and Common Values (p.74-75) Value-Driven, Responsible Supply Chain Management (p.168)
C1.3	+					Diversity, Inclusion, and Equal Opportunity (p.114-116)

COMPLIANCE STATUS						
	YES	NO	PARTIAL	NOT RELEVANT	DESCRIPTION	REPORTING INFORMATION REGARDING PUBLICLY DISCLOSED DATA /LINK
C1.4	+					Diversity, Inclusion, and Equal Opportunity (p.114-116) Value-Driven, Responsible Supply Chain Management (p.168-169)
C1.5	+					Human Rights, Business Ethics and Common Values (p.74) Human Capital (p.112-113) Training and Development Programs (p.123)
C1.6	+					Human Rights, Business Ethics and Common Values (p.74)
C1.7	+					Employee Loyalty and Happiness (p.117)
C1.8	+					Safe and Healthy Work Environment (p.119-120)
C1.9	+					Safe and Healthy Work Environment (p.119-120)
C1.10	+					Digital Security and Wellbeing (p.149-150) www.turkcell.com.tr/tr/gizlilik-ve-guv-venlik?page=kisisel-verilerin-korunmasi
C2. Stakeholders, International Standards and Initiatives						
C2.1	+					Human Rights, Business Ethics and Common Values (p.74) www.turkcell.com.tr/todiek
C2.2	+					Techfin Services (p.66-67) Social Investment and Sponsorship Projects (p.174-177)
C2.3	+					Environmental Management (p.184)
C2.4	+					Customer Satisfaction Management (p.166)
C2.5	+					Interactions with Our Stakeholders (p.52-53)
C2.6	+					About the Report (p.28)
C2.7	+					Turkcell's Sustainability Initiative Memberships (p.54-55)
C2.8	+					Sustainability Indices and Performance Indicators (p.93)
D. Corporate Governance Principles						
D1	+					Turkcell Sustainability Priorities (p.46-47) Interactions with Our Stakeholders (p.52-53)
D2	+					Equality of Digital and Social Opportunity (p.172-173) Social Investment and Sponsorship Projects (p.174-177)