



GAMA ENERJİ

SUSTAINABILITY REPORT

2025



Contents

About the Report 4	Message from the General Manager 6	GAMA Enerji at a Glance 8	A New Chapter in Energy 11				
Corporate Profile 12 - About GAMA Enerji 14 - Vision and Mission 18 - History and Milestones 20 - Partnership Structure 22 - GAMA Enerji Subsidiaries 24 - Membership Affiliations and Collaborations 27 - Certifications 28	Corporate Governance 30 - Corporate Governance Approach 32 - Organizational Structure 33 - Management Systems, Internal Control and Audit 38 - Ethics and Transparency 40 - Risk Management Approach 42	Social Sustainability 84 - Human Resources Approach 86 - Employee Satisfaction 88 - Diversity, Equity and Inclusion 90 - Talent Management and Career Development 92 - Occupational Health and Safety 96 - Stakeholder Engagement Management 100 - Responsible Supply Chain Management 106 - Customer Satisfaction Approach 109 - Corporate Social Responsibility and Community Investments 110	Digitalization and Information Security 114 - Digitalization and R&D 118 - Information Security 121	Sustainability Approach 44 - Sustainability Governance Structure 48 - Sustainability Policy 50 - Double Materiality Analysis 54 - Company's Sustainability Targets 58 - Sustainability and Climate Risks 60 - Sustainability and Climate-Related Opportunity Areas 64	Climate and Environment 68 - Combating Climate Change 72 - Energy Management 74 - Water Management 78 - Waste Management 80 - Biodiversity 82	Annexes 122 - Performance Indicators 124 - Financial Performance Indicators 124 - Environmental Performance Indicators 125 - Social Performance Indicators 127 - Definitions and Abbreviations 132 - GRI Content Index 136	 

About the Report



This report has been prepared to transparently and systematically disclose GAMA Enerji's environmental, social, and governance (ESG) performance for the period from January 1, 2025, to December 31, 2025, unless otherwise stated. The report addresses the activities carried out by GAMA Enerji in line with its sustainability approach, its material sustainability topics, initiatives implemented throughout the year, and its targets for the coming period.

The scope of the report covers GAMA Enerji's production plants that were operational during the reporting period, as well as activities under its operational control. Prepared in accordance with the GRI Standards and with consideration of the Türkiye Sustainability Reporting Standards (TSRS), the report assesses information relating to environmental performance, employee practices, occupational health and safety, community investments, corporate governance practices, and sustainability management.

Regarding stakeholder engagement as a fundamental element of sustainability management, GAMA Enerji carefully considers the views and expectations of its stakeholders in its decision-making and implementation processes. You may submit your comments, suggestions, and questions regarding the report via energy@gamaenergy.com. Your input will serve as a valuable guide on GAMA Enerji's journey toward creating sustainable value.



Message from the General Manager



Esteemed Stakeholders,

For GAMA Enerji, sustainability is not merely a performance indicator reported on an annual basis; it represents a fundamental approach that guides all our activities, from investment decisions to operational processes. In 2025, in line with this understanding, while continuing to improve our existing operations, we also considered our work on hybrid generation, capacity expansion, energy storage, and international project development as strategic steps that will contribute to the energy transition and shape our future.

This year marked an important period of transformation for our company, during which our portfolio structure was reshaped and our priorities for the future were defined. By bringing our Çakırlar and Lamas III-IV Hydroelectric Power Plants together under GARET, we took an important step toward managing our renewable energy assets in a more effective and integrated manner. With the İç Anadolu Natural Gas Combined Cycle Power Plant exiting our portfolio at the beginning of 2026, we embarked on a new chapter in our energy generation portfolio.

Our renewable energy investments and efforts to improve energy efficiency continued to be tangible reflections of our sustainable growth

approach. In this context, we commissioned a 2.5 MWp / 1.99 MWe solar power plant, GAMA Enerji's first solar energy investment, to reduce the electricity consumption of the Diwaco Water Transportation Facility. We also continued our efforts toward the planned capacity expansions at our Gökres-2, Kırkağaç, and Sares wind power plants.

In our investment decisions, we placed particular importance on considering environmental and social impacts at an early stage, alongside technical and economic assessments. Through biodiversity, geological, and hydrogeological studies conducted as part of our new and existing projects, we strengthened our capabilities to protect natural resources and manage environmental risks more effectively.

Climate change mitigation, energy and resource efficiency, and corporate resilience remain among the key pillars of our sustainability approach. In 2025, while continuing our carbon and water footprint assessments, we also took steps toward developing our emissions reduction roadmap.

The development, well-being, and organizational engagement of our employees remain at the heart of our understanding of sustainable success. Through initiatives in training, career

development, employee well-being, diversity, and inclusion, we strengthened our participatory and collaborative corporate culture. In addition, within the scope of social sustainability, we continued to contribute to the development of young people, local development, and social benefit through the Artı Değer (Surplus Value) Scholarship Program, the Local Products Project, educational initiatives, and collaborations with universities.

I believe that strong companies are carried into the future not only by the assets they possess, but also by their ability to move forward in the face of changing circumstances without compromising their values. At GAMA Enerji, we see sustainability as an integral part of this understanding. While fulfilling our responsibilities today, we act with consideration for the needs of tomorrow. In the coming period, we will continue to create value and build trust with the same perspective. I would like to thank all our colleagues, business partners, and stakeholders who have contributed to this journey.

Sincerely,

Tamer ÇALIŞIR

GAMA Enerji

General Manager and Board Member

GAMA Enerji at a Glance



One of the
top 20
electricity producers
in Türkiye



1,119.4 MW
Total installed
capacity



Approximately
1.3%
of annual electricity
generation in Türkiye



2.5 MWp / 1.99 MWe
Solar Power
Plant*

*GAMA Enerji's first
solar energy investment



556
Total Employees*
*267 direct and
289 subcontracted employees



Subsidiaries and
operations in **3** countries
10 Production Plants
1 Water Transmission
Line



18.4%
Women
Employment Rate*
*Among direct
employees



50%
Women
employment rate
at headquarters

A New Chapter in Energy

2025 was an important year of transformation for GAMA Enerji, marked by the reshaping of its portfolio structure and the planning of future investments. In this context, Anadolu Elektrik Üretim Ticaret Sanayi A.Ş., the owner of the Çakırlar Hydroelectric Power Plant, and TGT Enerji Üretim ve Ticaret A.Ş., the owner of the Lamas III-IV Hydroelectric Power Plant, merged under Garet Enerji Üretim ve Ticaret A.Ş. (GARET) as of April 15, 2025. GARET is wholly owned by GAMA Enerji A.Ş. This merger enabled the run-of-river hydroelectric power plants to be managed under a single structure, creating a more effective framework in terms of operational efficiency, corporate governance, and portfolio management.

Meanwhile, the İç Anadolu Natural Gas Combined Cycle Power Plant (NGCCPP) exited GAMA Enerji's portfolio as of January 30, 2026. Accordingly, the activities presented in this report cover the investment development efforts carried out during the period when the facility was part of the portfolio.

GAMA Enerji adopts an approach that considers environmental and social impacts at an early stage of investment decisions and evaluates technical feasibility studies alongside sustainability criteria.

During 2025, the Sares Hybrid Solar Power Project Biodiversity Baseline Assessment Report and the Karacaören 1&2 Hydroelectric Power Plants Biodiversity Baseline Assessment Report were also completed. These studies assessed biodiversity considerations associated with new and existing investments, strengthening the technical foundation for identifying potential environmental impacts and planning appropriate management measures.

The work carried out demonstrates GAMA Enerji's approach to developing new investments by considering their technical, environmental, and social dimensions in an integrated manner. Geological, hydrogeological, and biodiversity assessments provide comprehensive support for investment decisions from the planning stage onward. This approach contributes to the early identification of environmental risks, the protection of natural resources, and the implementation of project development processes aligned with international good practices.

“Ongoing efforts demonstrate that GAMA Enerji develops its new investments by simultaneously evaluating their technical, environmental, and social dimensions.”

Corporate Profile

About GAMA Enerji

Established in 2002, GAMA Enerji is a well-established investment company operating at national and international levels in the fields of energy generation and water infrastructure. Drawing on the knowledge, engineering expertise, and long-term investment approach it has developed since its establishment, the company conducts its activities with a commitment to continuous improvement and diversifies its investment portfolio in line with evolving energy needs and global transformation dynamics.

With a total installed capacity of 1,119.4 MW, GAMA Enerji meets approximately 1.3% of Türkiye's annual electricity generation, making it one of the country's leading electricity producers. In addition to its operations in Türkiye, the company also has investments in Jordan and aims to create economic, environmental, and social value in all geographies where it operates.

In addition to water supply and transmission projects, GAMA Enerji continued to generate energy throughout 2025 through wind power plants (WPPs), hydroelectric power plants (HPPs), and the İç Anadolu Natural Gas Combined Cycle Power Plant (NGCCPP), which was part of its portfolio during the year. While contributing to energy supply security, the Company continued to act with a responsible investment approach aimed at supporting a more sustainable future. Placing people and the environment at the center of its activities at every stage, GAMA Enerji considers compliance with applicable national legislation and international standards a fundamental principle and supports this approach through its strong human resources and corporate expertise.

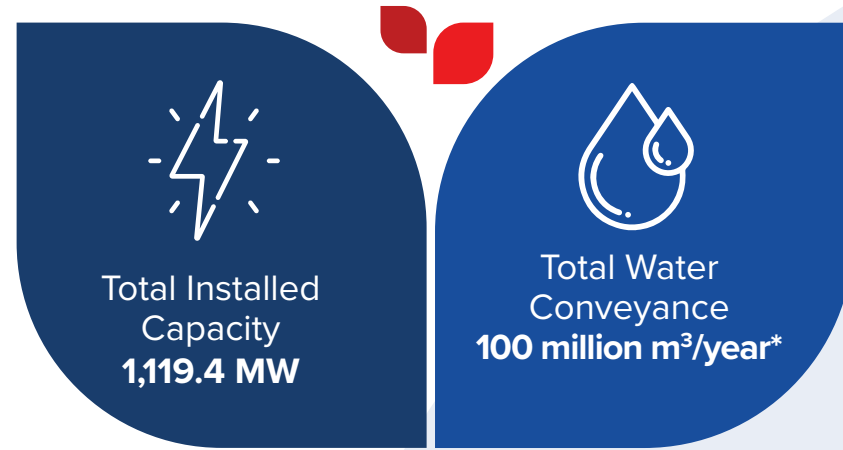
GAMA Enerji places great importance on building relationships based on trust, transparency, and mutual cooperation with all its stakeholders, particularly its employees, business partners, investors, public institutions, and local communities. Believing that sustainable growth can only be achieved by creating value together with its stakeholders, the company shapes its long-term success in line with responsible corporate governance and sustainability principles.

“
Sustainable and
responsible investments
in energy and water
infrastructure
”



Gökres-2 WPP

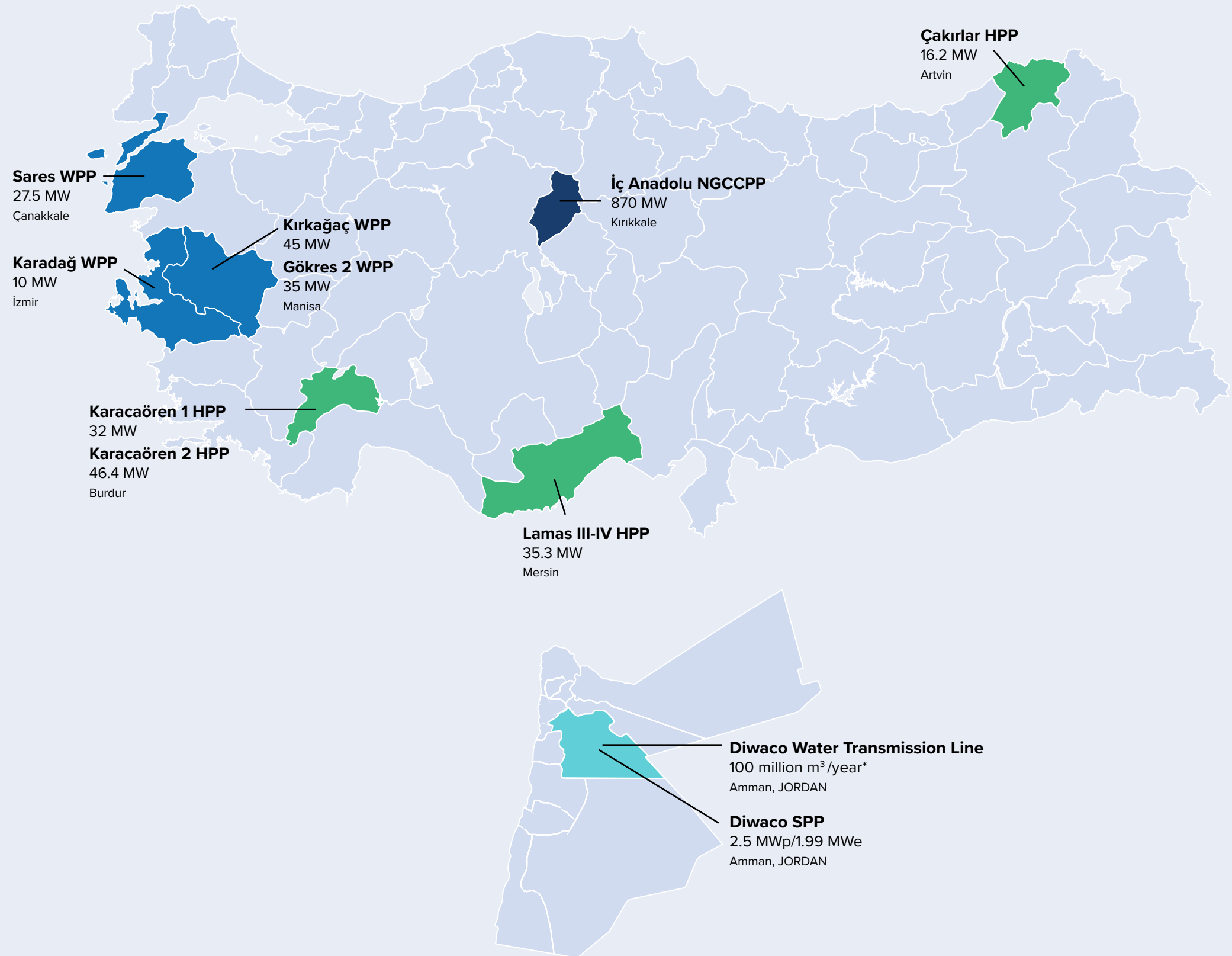
GAMA Enerji Areas of Activity



Name of Asset	Licensed Installed Capacity (MW)	2025 Production (MWh)
Çakırlar HPP	16.2	49,227
Diwaco SPP	1.99	1,092
Gökres 2 WPP	35	102,038
İç Anadolu NGCCPP	870	3,923,193
Karacaören 1 HPP	32	33,281
Karacaören 2 HPP	46.4	56,583
Karadağ WPP	10	29,023
Kırkağaç WPP	45	171,265
Lamas III-IV HPP	35.3	0
Sares WPP	27.5	84,777

Name of Asset	Water Conveyance Capacity*	2025 Water Conveyance Quantity	Installed SPP Capacity (MW)
Diwaco Water Transmission Line	100 million m³/year	117 million m³/year	2.5 MWp/1.99 MWe

*The contract refers to water conveyance capacity, and efforts are ongoing to permanently increase this capacity to 120 million m³/year.



Vision and Mission



Vision:

To become a preferred and increasingly digitalized company that grows by diversifying its investment portfolio across different geographies in line with the values and policies of its shareholders.



Mission:

As an international energy and water infrastructure investment company, to grow within the framework of sustainability principles, respecting the environment, society and employees while creating added value for all stakeholders.

History and Milestones

Establishment of
GAMA Enerji

2002

Establishment of GATES
Elektrik Enerjisi Toptan
Satış A.Ş. to operate in the
wholesale electricity market

2007

Commissioning of the first HPP
project (Çakırlar HPP)

Commissioning of
Lamas III-IV HPP

2009

Commissioning of the first
WPP project (Sares WPP)

2010

Natural Gas Combined Cycle Power Plant commenced
operations

Acquisition of the operation of Karacaören 1&2 HPP through
privatization

Commissioning of Kırkağaç WPP

GAMA Enerji adopted its current shareholder structure

2016

Diwaco Water Transportation
Project commenced commercial
operations

Commissioning of Gökres-2 WPP

2014

Establishment of GEAŞ İşletme ve
Bakım A.Ş. to carry out the operation
and maintenance activities of GAMA
Enerji's power generation assets

2013

Commissioning of
Karadağ WPP

2012

First transactions conducted in the Forward
Electricity and Natural Gas Markets

First transaction conducted in the YEK-G
market in 2021 (Karacaören 1&2 HPP)

2021

Publication of the first Sustainability
Report

Increase of the İç Anadolu NGCCPP's
generation capacity to 870 MW

2022

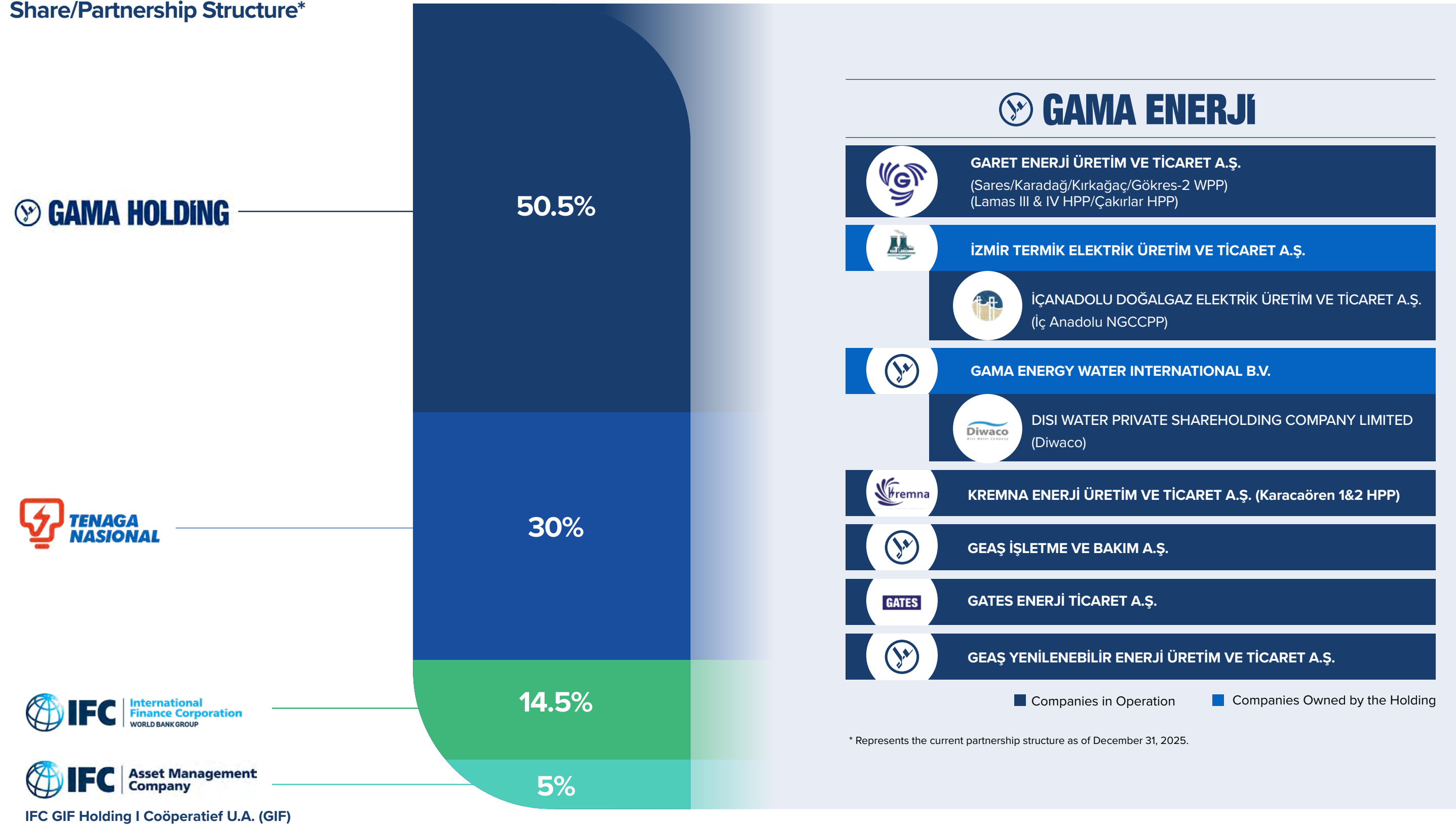
Commissioning of the Diwaco
2.5 MWp / 1.99 MWe solar power plant

Signing of a Preliminary Turbine Supply
Agreement with Goldwind as part of
the capacity expansion projects for
Gökres-2, Kırkağaç, and Sares WPPs

2025

Partnership Structure

Share/Partnership Structure*



GAMA Enerji Subsidiaries

GAMA Enerji Domestic Subsidiaries

İÇANADOLU DOĞALGAZ ELEKTRİK ÜRETİM VE TİCARET A.Ş.

İçanadolu Doğalgaz Elektrik Üretim ve Ticaret A.Ş. is a subsidiary in which GAMA Enerji holds a 100% shareholding through İzmir Termik. İç Anadolu NGCCPP, Türkiye's first digital natural gas combined cycle power plant, has an installed capacity of 870 MW. The facility exited GAMA Enerji's portfolio as of January 30, 2026.

İZMİR TERMİK ELEKTRİK ÜRETİM VE TİCARET A.Ş.

İzmir Termik Elektrik Üretim ve Ticaret A.Ş. is a subsidiary wholly owned by GAMA Enerji A.Ş. and was established on August 24, 2007. The company holds 100% of the shares in İçanadolu Doğalgaz Elektrik Üretim ve Ticaret A.Ş. and transferred its entire shareholding as of January 30, 2026.

GARET ENERJİ ÜRETİM VE TİCARET A.Ş.

GARET is a subsidiary wholly owned by GAMA Enerji. Established in March 2006, GARET added Sares WPP (27.5 MW) to its portfolio in 2010, Karadağ WPP (10 MW) in 2012, Gökres-2 WPP (35 MW) in 2014, and Kırkağaç WPP (45 MW) in 2016. GARET also owns Lamas III-IV HPP (35.3 MW) and Çakırlar HPP (16.2 MW). Both hydroelectric power plants commenced commercial operations in 2009. As of April 15, 2025, Lamas III-IV HPP, previously operated by TGT Enerji Üretim ve Ticaret A.Ş., and Çakırlar HPP, previously operated by Anadolu Elektrik Üretim Ticaret Sanayi A.Ş., were merged under GARET, which is wholly owned by GAMA Enerji. Today, GARET has a total installed capacity of 169 MW comprising wind and hydroelectric power plants.

Sares WPP participates in carbon trading under the Gold Standard (GS), while I-REC green energy certificates are sold for Karadağ WPP, Gökres-2 WPP, and Kırkağaç WPP.

Çakırlar HPP continues its carbon trading activities under the Gold Standard (GS), while Lamas III-IV HPP operates under the Verified Carbon Standard (VCS).

KREMNA ENERJİ ÜRETİM VE TİCARET A.Ş.

Kremna Enerji Üretim ve Ticaret A.Ş. is a subsidiary wholly owned by GAMA Enerji and owns Karacaören 1 HPP (32 MW) and Karacaören 2 HPP (46.4 MW). The power plants commenced commercial operations in 1990 and 1993, respectively, were acquired through privatization in 2016, and continue their operations under Kremna.

As of August 2021, Kremna has been selling YEK-G certificates within the YEK-G Organized Market.

GATES ENERJİ TİCARET A.Ş.

GATES is a subsidiary wholly owned by GAMA Enerji. Established in 2007, GATES Enerji Ticaret A.Ş. is an energy supply company engaged in wholesale electricity trading for end users. The company operates in electricity supply to eligible consumers, energy trading through over-the-counter markets and bilateral agreements, natural gas trading, portfolio optimization, and the sale of I-REC certificates.

GEAŞ İŞLETME VE BAKIM A.Ş.

GEAŞ İşletme ve Bakım A.Ş. was established in 2013 to conduct the operation and maintenance activities of the electricity generation facilities within GAMA Enerji's portfolio and is wholly owned by GAMA Enerji. The company carries out plant operations, planned and unplanned maintenance activities, spare parts procurement, warehouse management, administrative affairs, and coordination activities with public institutions and organizations.

GEAŞ YENİLENEBİLİR ENERJİ ÜRETİM VE TİCARET A.Ş.

GEAŞ Yenilenebilir Enerji A.Ş. is a subsidiary wholly owned by GAMA Enerji A.Ş. The company was established on January 11, 2023, with a focus on business development activities in the energy sector and, as of the reporting period, did not hold any assets or investment portfolio.

GAMA Enerji International Subsidiaries

DISI WATER PRIVATE SHAREHOLDING COMPANY LIMITED (DIWACO)

Diwaco is a subsidiary wholly owned by GAMA Enerji Water International B.V. Diwaco is an infrastructure water supply project with an investment value of approximately USD 970 million, developed to contribute to meeting the water supply needs of Amman, the capital of Jordan, and its surrounding areas. Commencing commercial operations in 2014, the project transports 100 million m³ of water annually sourced from the DISI aquifer to Amman via pipeline under a 25-year off-take guarantee. Under the contract, the annual water transportation capacity is set at 100 million m³, and efforts are ongoing to increase this capacity to 120 million m³ per year.

GAMA ENERGY WATER INTERNATIONAL B.V.

GAMA Energy Water International B.V. is the partner and sponsor of Diwaco and is a subsidiary wholly owned by GAMA Enerji.

Membership Affiliations and Collaborations

- Bilkent University Career and Alumni Office
- WEC – World Energy Council
- EDIDER - Energy Digitalization Association
- ETA – Energy Trading Association
- EPA – Electricity Producers Association
- GAMA Education Foundation
- GUYAD - Energy Investors Association
- KalDer - Turkish Quality Association
- METU Design Factory
- TUREB - Turkish Wind Energy Association
- TUSIAD – Turkish Industry and Business Association
- YASED - International Investors Association
- TOBB ETU - University of Economics and Technology of the Education and Culture Foundation of the Chambers and Commodity Exchanges of Türkiye

Certifications

Company	Asset/Activity	Certifications					
		ISO 9001:2015	ISO 14001:2015	ISO 45001:2018	ISO 50001:2018	ISO 14064-1:2018	TS ISOIEC 27001:2022
GAMA Enerji A.Ş.	Ankara Headquarters Managerial Activities	✓	✓	✓	✓	✓	✓
GATES Enerji Ticaret A.Ş.	Ankara and Istanbul Offices Commercial Activities	✓	✓	✓	✓	✓	
GEAŞ İşletme ve Bakım A.Ş.	Operating and Maintenance Activities for Domestic Assets	✓	✓	✓	✓	✓	
Garet Enerji Üretim ve Ticaret A.Ş.	Sares WPP, Karadağ WPP, Kırkağaç WPP, Gökres-2 WPP, Çakırlar HPP, Lamas III & IV HPP	✓	✓	✓	✓	✓	
Kremna Enerji Üretim ve Ticaret A.Ş.	Karacaören 1&2 HPP	✓	✓	✓	✓	✓	✓
İç Anadolu Doğalgaz Elektrik Üretim ve Ticaret A.Ş.	İç Anadolu NGCCPP	✓	✓	✓	✓	✓	✓
DISI Water Private Shareholding Company Limited	Diwaco Water Transmission Line	✓				✓	

Corporate Governance



Corporate Governance Approach

At GAMA Enerji, corporate governance is implemented as a strategic approach that forms the foundation of sustainable value creation and guides the Company’s long-term success. The Company conducts its activities based on the principles of transparency, accountability, fairness, adherence to ethical principles, and responsibility. Considering stakeholder expectations, effectively managing risks, ensuring compliance with legal and regulatory requirements, and integrating sustainability priorities into decision-making processes are integral components of the company’s corporate governance approach.

Building trust-based, transparent, and long-term relationships with all stakeholders—including employees, shareholders, investors, customers, suppliers, public institutions, and local communities—is among GAMA Enerji’s key corporate governance priorities. Adherence to ethical values, open communication, compliance with national and international standards, and practices aimed at continuously improving corporate performance support the governance structure while ensuring that economic growth across all geographies where the Company operates is considered together with environmental and social responsibility. In line with this approach, the Company believes that corporate success is strengthened by creating lasting and sustainable value for all stakeholders.

GAMA Enerji’s corporate governance practices are supported by an integrated structure in which strategic planning, risk management, and internal audit and compliance processes carried out under the Integrated Management Systems complement one another. Strengthened by policies, procedures, and control mechanisms, this structure contributes to improving operational efficiency, supporting financial sustainability, integrating technological developments into business processes, and effectively managing renewable energy investments. Committees operating under the Board of Directors contribute to the effectiveness of the governance structure by bringing assessments from different areas of expertise into strategic decision-making processes. In response to changing market conditions and regulatory developments, corporate governance practices are regularly reviewed and continuously improved.

“GAMA Enerji believes that corporate success is strengthened by creating lasting and sustainable value for all stakeholders.”

Organizational Structure

GAMA Enerji’s organizational structure constitutes the management model that enables its corporate governance approach to be effectively implemented throughout the organization. This structure, in which roles, authorities, and responsibilities are clearly defined, strengthens accountability and transparency while fostering effective collaboration across different functions and ensuring that the Company’s activities are carried out in alignment with common objectives. The knowledge and experience of Board members across diverse areas of expertise bring a multifaceted perspective to strategic decision-making processes, further reinforcing GAMA Enerji’s corporate governance approach and its commitment to long-term value creation.

Members of the Board



Ahmet Hakan Özman
Representing GAMA Holding A.Ş.,
Chairman of the Board of Directors



İsmail Ömer Tunçata
Deputy Chairman of the Board



Elif Ateş Özpak
Member of the Board



İrem Baysal
Member of the Board



Mohd Zarihi bin Mohd Hashim
Member of the Board

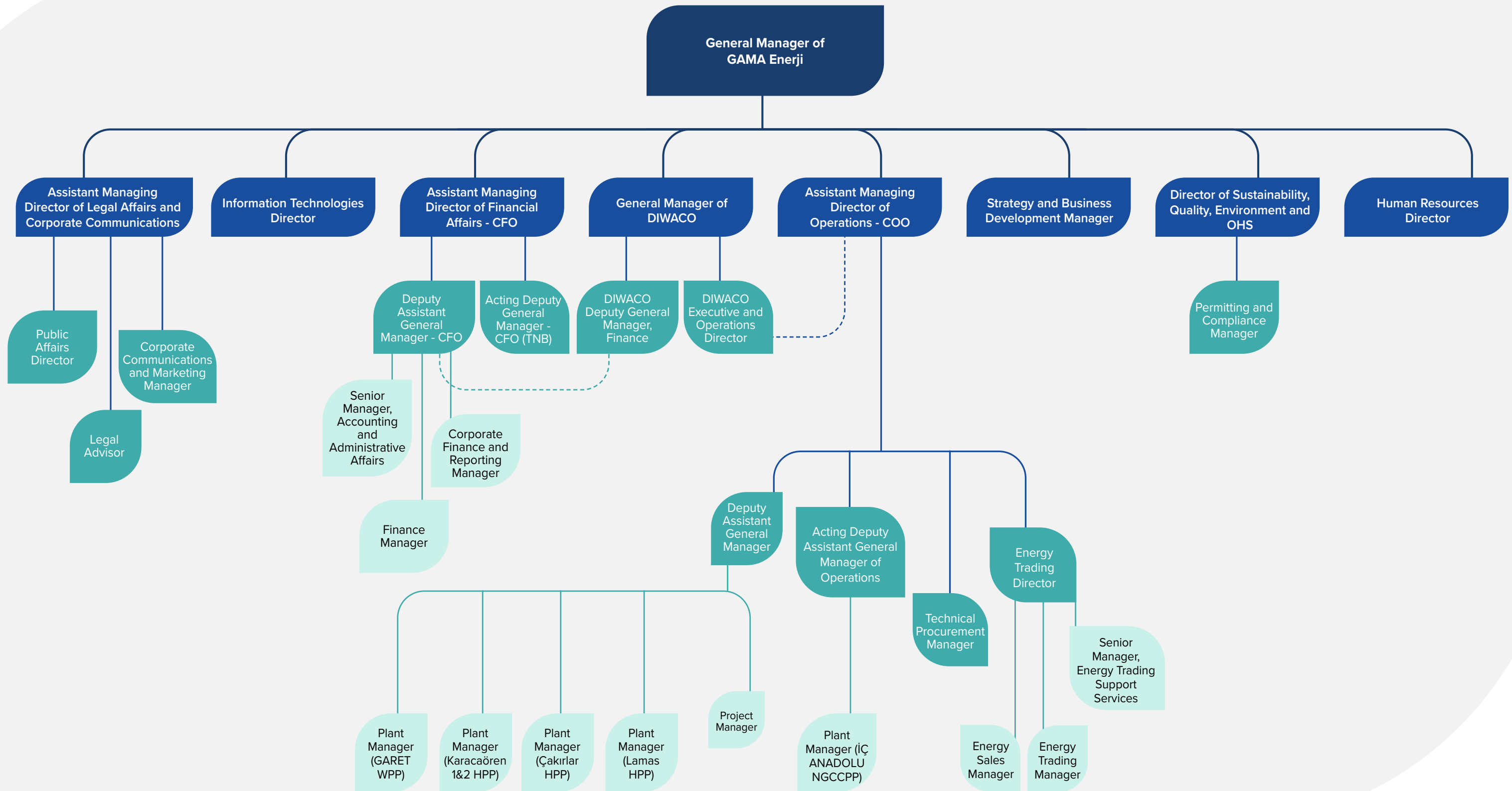


Nazmi Bin Othman
Member of the Board



Tamer Çalışır
Member of the Board
and General Manager of
GAMA Enerji

Organization Chart



The organizational structure established among the Board of Directors, senior management, central functions, and production plants clearly defines the distribution of responsibilities and management relationships across the Company. Operations, finance, energy trading, asset management, human resources, information technologies, legal affairs, corporate communications, as well as sustainability, quality, environmental, and occupational health and safety functions operate in coordination toward common objectives. Through effective information flow, interdisciplinary collaboration, and strong coordination among functions, operational processes are managed through an integrated approach, ensuring that corporate priorities are consistently reflected across all levels of the organization.

The committees operating under the Board of Directors play an important role in systematically incorporating assessments from different areas of expertise into strategic decision-making processes. The Strategy, Risk and Investment Committee, Investment Screening Committee, Sustainability Committee, and Remuneration and Nomination Committee provide assessments and recommendations to the Board of Directors within their respective areas of responsibility.

Through this structure, strategic priorities, corporate risks, governance practices, and sustainability objectives are considered from different perspectives, strengthening the effectiveness of decision-making processes and the integrity of the corporate governance framework.

“GAMA Enerji believes that corporate success is strengthened by creating lasting and sustainable value for all stakeholders.”



Strategy, Risk and Investment Committee

Contributes to the assessment of strategic objectives, investment decisions, and corporate risks.



Investment Screening Committee

Evaluates investment opportunities and projects in line with strategic priorities.



Sustainability Committee

Supports the development and monitoring of Environmental, Social, and Governance strategies, targets, and performance.



Remuneration and Nomination Committee

Conducts assessments relating to remuneration, incentive, and nomination processes.



Management Systems, Internal Control and Audit

Internal control and audit practices are among the key management elements that strengthen the reliability of the corporate governance structure and help ensure that activities are carried out effectively, transparently, and in compliance with applicable legal regulations. The key priorities of this approach include improving operational processes, effectively managing financial and operational risks, protecting corporate assets, and ensuring compliance with company policies and procedures. Internal control mechanisms not only enable the monitoring of existing practices but also support the maintenance of a strong management culture that contributes to achieving corporate objectives.

Management systems internal audits conducted in accordance with annual audit programs enable the effectiveness of processes to be regularly assessed and areas for improvement to be identified in a timely manner. Audits conducted using a risk-based approach evaluate the level of implementation of management systems, compliance with procedures, and process performance from an integrated perspective. Quality, environmental, occupational health and safety, energy management, and information security practices are regularly reviewed. Based on the findings, corrective and preventive actions are planned, their effectiveness is monitored, and the sustainability of the improvements implemented is verified.

At GAMA Enerji, internal control and audit activities are regarded not merely as mechanisms for assessing compliance, but as strategic management tools that foster a culture of continuous improvement. Findings obtained from processes guide efforts to strengthen risk management practices, enhance the effectiveness of management systems, and improve operational performance, while also supporting organizational learning. Conducted with a continuous improvement mindset, these activities constitute an integral part of a management approach that enables adaptation to changing conditions, strengthens organizational resilience, and continuously supports the development of the governance structure.



Ethics and Transparency

Ethical principles and a commitment to transparency shape GAMA Enerji’s corporate culture and guide its approach to sustainable value creation. The Core Principles of Code of Business Ethics, implemented as part of the Compliance Management Program, establish common ethical standards of conduct for employees, managers, and business partners, while providing guidance on reflecting the principles of integrity, fairness, impartiality, and responsibility across all activities.

Ethics training strengthens employees’ shared awareness, while legal and other obligations are systematically monitored and compliance processes are carried out within defined frameworks. Open, accurate, and timely communication is the basis for relationships with stakeholders, with the principles of transparency and accountability observed in information sharing.

Combating corruption and bribery is one of the key areas of application of the ethical culture. Practices are carried out in accordance with the Anti-Corruption Procedure and are based on the principles of the World Economic Forum Partnering Against Corruption Initiative (WEF-PACI). The program is implemented under the oversight of Senior Management and is regularly reviewed and updated in accordance with the legal regulations applicable in the countries where the Company operates. This approach supports the prevention of ethical risks, the strengthening of the compliance culture, and the conduct of business processes based on trust.



“Open, accurate, and timely communication is prioritized, with transparency and accountability upheld in information sharing.”

The following key practices are implemented as part of the Company’s ethical management approach:

- Rules aimed at preventing conflicts of interest are implemented, and employees are expected to perform their duties in accordance with ethical principles and in consideration of the Company’s interests.
- A zero-tolerance approach is adopted toward bribery, facilitation payments, and other attempts to obtain improper benefits. Processes relating to gifts, hospitality, travel, accommodation, donations, and sponsorships are managed in accordance with defined rules.
- Mechanisms for reporting ethical violations are operated on a confidential basis. Where necessary, anonymous reports are considered and addressed through the relevant management processes.
- Relationships with employees, customers, suppliers, public institutions, and other stakeholders are conducted based on mutual trust, respect, and transparency.
- Protecting employee rights, promoting equal opportunity, preventing discrimination, and maintaining a zero-tolerance approach toward all forms of harassment and abuse are among the fundamental elements of the corporate ethical culture.
- Economic growth objectives are evaluated together with environmental responsibility, social contribution, and sustainable development principles.

No reports of conduct contrary to ethical principles were received during the reporting period. No cases involving suspected ethical violations were identified, and no investigation or sanction process was initiated in this regard.

Risk Management Approach

GAMA Enerji regards risk management as a strategic management tool that supports organizational resilience, operational continuity, and its approach to sustainable value creation. Accordingly, corporate risks are systematically identified, assessed, and managed through effective control mechanisms. The effectiveness of existing control activities implemented for each risk is regularly reviewed, and control levels are rated using a standardized methodology. This enables the adequacy of risk mitigation activities to be monitored against objective criteria, areas for improvement to be identified at an early stage, and the continuous improvement of the risk management system to be supported.

The effectiveness of control activities is assessed using the following rating system.

Score	Rating	Definition
4	Strong	The likelihood of failure of risk mitigation and control activities is very low. Existing controls exceed adequacy requirements, and no further improvement is needed.
3	Adequate	Control activities are adequate under current conditions. Although the risk of failure is low, there are limited areas for improvement.
2	Needs Improvement	There is a risk that control activities may prove inadequate in certain circumstances. Risk mitigation mechanisms need to be strengthened.
1	Non-existent	Risk mitigation or control mechanisms are either absent or ineffective. Additional control activities are required.

Following the implementation of control activities, the expected improvement in the risk level is monitored through the Expected Mitigated Risk Rating indicator. This enables the effectiveness of existing controls in reducing risk exposure to be measured, while additional improvement and action requirements are assessed based on the results obtained.

The risk management system also incorporates Key Risk Indicators (KRIs). When predefined threshold values are exceeded, trigger and escalation points are activated, and specific reporting and response processes are implemented for the relevant risks. This approach enables changes in risk exposure to be monitored proactively and supports timely decision-making with reliable and up-to-date data.

Sustainability Approach



GAMA Enerji's sustainability approach is shaped by the effective management of environmental and social impacts and its objective of creating long-term corporate value. The Company's sustainability approach is based on reducing environmental impacts, addressing climate change, using natural resources efficiently, supporting employee well-being, strengthening an ethical business culture, and integrating strong corporate governance principles into all activities. In line with this approach, GAMA Enerji regards sustainability not only as a component of its operational processes but also as a fundamental element of its corporate culture. Accordingly, the Company places importance on extending its sustainability culture to employees, their families, and all stakeholders, and on strengthening sustainability awareness throughout the entire value chain through training, communication, and awareness-raising activities.

Closely monitoring the risks and opportunities arising from the transformation of the energy sector, GAMA Enerji conducts its sustainability initiatives in an integrated manner with its business strategies, investment decisions, risk management processes, and performance management system. In this context, the Company aims to continuously improve its environmental, social, and governance performance by taking national and international sustainability standards into consideration, integrate stakeholder expectations into decision-making processes, and build a resilient organizational structure for the long term.

“

GAMA Enerji regards sustainability not only as a component of its operational processes but also as a fundamental element of its corporate culture.

”



Sustainability Governance Structure

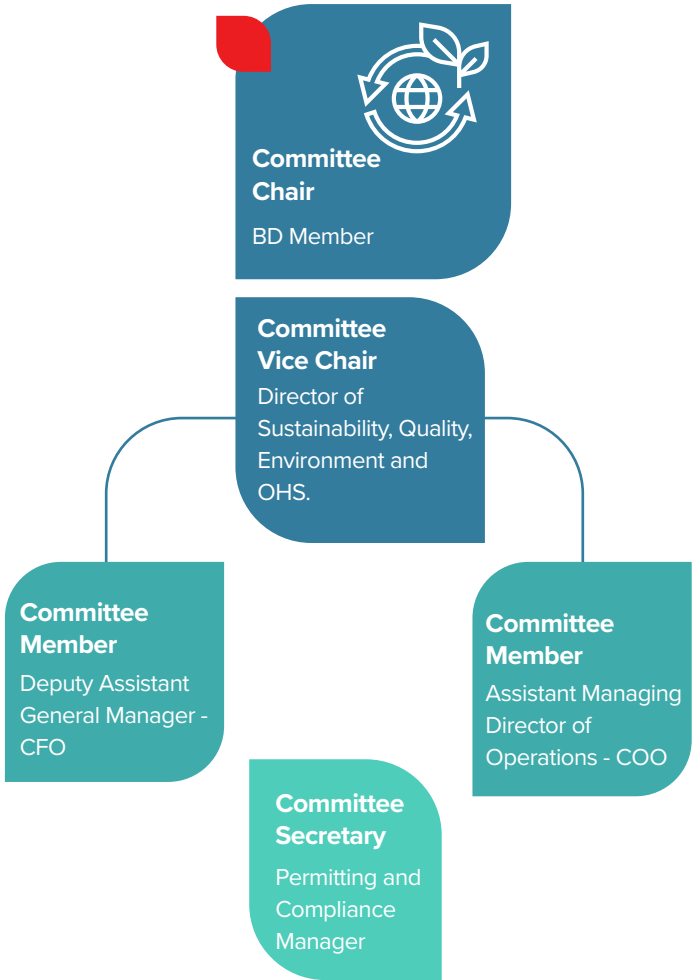
At GAMA Enerji, sustainability activities are coordinated by the Sustainability Committee, which operates under the oversight of the Board of Directors. The Committee monitors the implementation of the Company’s sustainability strategy and regularly evaluates developments in the environmental, social, and governance areas.

The Committee is chaired by a Board Member. The position of Vice Chair is held by the Director of Sustainability, Quality, Environment and OHS. The Committee also includes the Deputy Assistant General Manager responsible for Finance and the Deputy General Manager responsible for Operations. Secretariat activities are carried out by the Permits and Compliance Manager.

In 2025, the Sustainability Committee held two meetings. A total of 12 agenda items were discussed, with all meetings completed with 100% attendance. The key topics addressed throughout the year included:

- Results of the Double Materiality Analysis,
- Sustainability reporting preparations,
- Carbon and Water Footprint Reporting activities,
- CDP reporting processes,
- Carbon reduction targets,
- Risks arising from climate change and the Emissions Trading System (ETS),
- Regulatory changes,
- Gender Equality Program.

Following these meetings, decisions were taken to integrate sustainability indicators into the performance evaluation system and to examine good practices and examples from across the sector.



Working groups operating at GAMA Enerji carry out activities under the following areas: Energy Management, Quality Management, Greenhouse Gas Inventory, Water Footprint, Sustainability Report, and Do More With Less (DMWL). The sustainability-related activities of these groups are discussed at Committee meetings, and matters deemed necessary are submitted to the Board of Directors for consideration. Through this structure, sustainability initiatives are coordinated across the Company. A strong link is established between strategic objectives and operational practices, while sustainability performance is regularly monitored.

In 2025, significant steps were taken to strengthen sustainability governance. The results of the Double Materiality Assessment were integrated into corporate processes, while carbon and water footprint assessments became key tools supporting decision-making processes. During the same period, efforts continued to integrate sustainability indicators into the performance management system. The aim was to monitor sustainability targets as an integral part of corporate performance.

The Sustainability Committee also submitted strategic recommendations to the Board of Directors for the 2026–2030 period. In this context, it recommended establishing long-term targets for key indicators such as carbon intensity, water efficiency, and gender balance in management. Assessments on the more effective use of carbon and water footprint studies in investment decisions, risk management, and sustainable finance processes were also brought to the attention of the Board of Directors.

Through these efforts, sustainability at GAMA Enerji is addressed not only as a reporting activity but also as an integral part of corporate governance and strategic decision-making processes.

“Sustainability at GAMA Enerji is addressed not only as a reporting activity but also as an integral part of corporate governance and strategic decision-making processes.”



Çakırlar HPP

Sustainability Policy

GAMA Enerji considers sustainability an integral part of all its activities and aims to create long-term value by integrating Environmental, Social, and Governance (ESG) principles into its business processes. With the vision of leaving a more livable world for future generations, the Company supports sustainable growth across all sectors in which it operates and is committed to continuous improvement in environmental, social, and corporate governance areas through stakeholder engagement.

In line with this approach, the efficient use of natural resources, combating climate change, protecting employee rights, contributing to social development, and strengthening an ethical management approach are among the Company's key priorities. The Company aims to increase energy efficiency across all stages of its activities, expand the use of renewable energy sources, reduce greenhouse gas emissions, and regularly calculate and monitor its carbon footprint. In addition, GAMA Enerji is committed to sustainable water resource management, reducing waste generation, prioritizing environmentally friendly products and services, and continuously improving its environmental performance.

As part of its social sustainability approach, the health, safety, well-being, and development of employees are among the Company's key priorities. Practices aimed at strengthening an inclusive, equitable, and fair working environment are implemented across the organization. Initiatives that enhance employee engagement, training programs that support personal and professional development, performance-oriented development systems, and flexible working models contribute to a sustainable corporate culture. Increasing women employment, promoting equal opportunities, preventing all forms of discrimination, and encouraging employee participation in decision-making processes constitute key elements of the Company's social approach. In addition, GAMA Enerji aims to support local employment, develop projects that contribute to community development, and strengthen collaboration with stakeholders.



GAMA Enerji does not limit its sustainability approach to its own operations; it also adopts sustainability as a fundamental principle in supply chain management, customer relations, and its activities with all business partners. Awareness-raising initiatives, training programs, and communication activities are regularly conducted to promote a sustainability culture among employees and across the broader stakeholder base.

The Company regularly monitors and reports its sustainability performance in line with the principles of transparency, accountability, and ethical management. Its sustainability approach, developed in accordance with national regulations—particularly the TSRS as well as international sustainability standards and reporting frameworks, is continuously enhanced as a fundamental component of its corporate strategy.



Environmental Approach

GAMA Enerji considers minimizing environmental impacts among its corporate priorities and contributes to environmental protection through practices that support the sustainable use of natural resources. In line with the principle of “environmental responsibility” energy efficiency initiatives are closely monitored across all activities, with the aim of continuously improving energy performance through evolving technologies and infrastructure investments.

The Company aims to reduce the environmental impact of energy consumption by promoting energy conservation, supporting electricity generation from renewable energy sources, and expanding the use of environmentally friendly products and services across its operations. Practices aimed at reducing waste generation, using water resources efficiently, and preventing environmental pollution constitute key elements of its environmental management approach.

To combat climate change, carbon footprint calculations are conducted and verified regularly and monitored through performance indicators. Risk analyses are carried out to assess the environmental impacts of activities, and environmental performance is continuously improved based on the results, in line with the principle of continuous improvement.



Social Approach

GAMA Enerji considers contributing to economic and social development in the regions where it operates to be a fundamental element of its sustainability approach. Supporting local employment, developing projects that generate social benefits, and strengthening collaboration with stakeholders are among its key priorities.

Practices that protect employees’ health and safety, enhance their well-being and engagement, and training programs that support their personal and professional development form the foundation of the Company’s sustainable human resources approach. Continuous improvement of the working environment, fair remuneration and performance evaluation systems, equal opportunity, and the prevention of all forms of discrimination are among the Company’s fundamental human resources policies.

Increasing women employment, supporting diversity and inclusion, and encouraging employee participation in decision-making processes are important components of the Company’s social sustainability approach. In addition, training programs and social responsibility projects aimed at increasing sustainability awareness among all stakeholders, starting with employees, are implemented to strengthen the Company’s positive social impact.



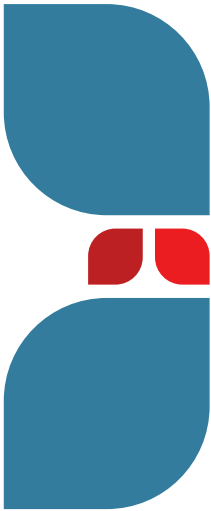
Transformation – Development – Governance Approach

GAMA Enerji aims to contribute to energy supply security through a balanced energy generation portfolio while sustainably developing its human resources, institutional knowledge, and financial strength. The Company seeks to strengthen operational excellence through initiatives that support digital transformation, innovation, sustainable finance, corporate risk management, and the use of innovative technologies.

Through its integrated management systems, the Company regularly evaluates the traceability and effectiveness of its activities, while adopting a continuous improvement approach across all processes through a service philosophy focused on customer satisfaction. GAMA Enerji regularly publishes sustainability reports prepared in accordance with national regulations and international standards, transparently sharing its performance and continuing to develop sustainability principles as an integral part of its corporate strategy.

Double Materiality Analysis

When developing its sustainability strategy, GAMA Enerji evaluates both the environmental, social, and economic impacts of its activities and the financial impacts of these matters on the Company. Through the Double Materiality Analysis conducted in this context, material sustainability topics for the Company were identified and integrated into strategic decision-making processes.

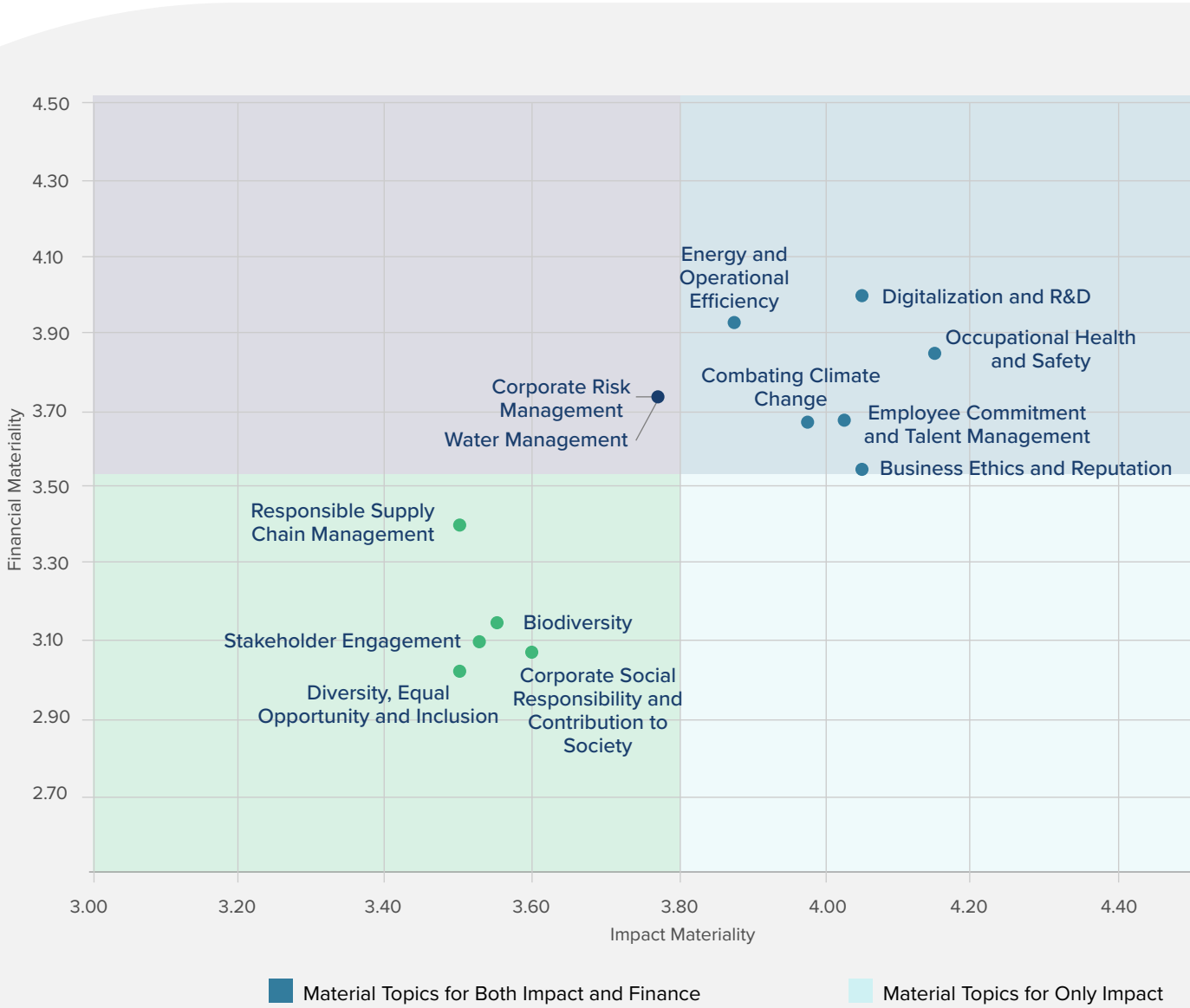


The assessment was conducted based on the double materiality approach defined under the European Sustainability Reporting Standards (ESRS) framework. The assessment also considered the financial materiality approach set out in IFRS S1 and IFRS S2, issued by the International Sustainability Standards Board (ISSB), as well as the stakeholder-oriented framework of the GRI Standards.

As part of the assessment process, input from internal and external stakeholders was evaluated, and the

environmental and social impacts of the Company's activities, together with the financial implications of these matters, were analyzed. Taking sectoral developments and good practices into consideration, 13 sustainability topics were assessed across impact and financial materiality dimensions, and a double materiality matrix was developed.

The figure below illustrates how the material sustainability topics are positioned from a double materiality perspective.



According to the results of the assessment, the following six topics were identified as GAMA Enerji’s high materiality sustainability topics:

These material topics form the foundation of the Company’s sustainability strategy while also demonstrating strong alignment with the international sustainability agenda. As a result of the mapping exercise, the relationship between the material topics and the United Nations Sustainable Development Goals (SDGs) is presented in the table below.



	1 NO POVERTY	2 ZERO HUNGER	3 GOOD HEALTH AND WELL-BEING	4 QUALITY EDUCATION	5 GENDER EQUALITY	6 CLEAN WATER AND SANITATION	7 AFFORDABLE AND CLEAN ENERGY	8 DECENT WORK AND ECONOMIC GROWTH	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	10 REDUCED INEQUALITIES	11 SUSTAINABLE CITIES AND COMMUNITIES	12 RESPONSIBLE CONSUMPTION AND PRODUCTION	13 CLIMATE ACTION	14 LIFE BELOW WATER	15 LIFE ON LAND	16 PEACE, JUSTICE AND STRONG INSTITUTIONS	17 PARTNERSHIPS FOR THE GOALS
Digitalization and R&D																	
Occupational Health and Safety																	
Energy and Operational Efficiency																	
Employee Commitment and Talent Management																	
Combating Climate Change																	
Business Ethics and Reputation																	

The results of the assessment demonstrate that GAMA Enerji’s activities are particularly and directly related to SDG 8 – Decent Work and Economic Growth, SDG 9 – Industry, Innovation and Infrastructure, SDG 10 – Reduced Inequalities, SDG 12 – Responsible Consumption and Production, and SDG 13 – Climate Action.

In addition, the Company’s activities make indirect contributions to SDG 3 – Good Health and Well-Being, SDG 4 – Quality Education, SDG 5 – Gender Equality, SDG 6 – Clean Water and

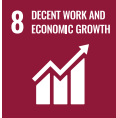
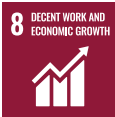
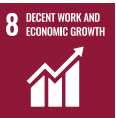
Sanitation, SDG 7 – Affordable and Clean Energy, SDG 14 – Life Below Water, and SDG 16 – Peace, Justice and Strong Institutions.

GAMA Enerji regularly reviews the priorities identified through its Double Materiality Assessment and monitors its sustainability performance accordingly. In this way, the Company continues to develop its strategic objectives in alignment with stakeholder expectations and international sustainability frameworks.



Company’s Sustainability Targets

Sustainability Strategic Priorities, Initiatives, and Targets

Initiatives and Targets			
Strategic Priority	2025 Initiatives	2026 Targets	Related SDGs
Financial Resilience and Operational Excellence	Cost optimization initiatives were continued to ensure effective management of operating expenses, while OPEX performance was closely monitored. Initiatives to improve operational efficiency were developed, with a focus on strengthening consolidated EBITDA performance and implementing process improvements that support financial resilience.	Improving operational efficiency, continuing OPEX optimization, improving EBITDA and EBITDA margin, and strengthening financial sustainability.	  
Strategic Portfolio Management and Innovation	Project NOVA is a comprehensive restructuring and value creation project aimed at strengthening GAMA Enerji’s financial structure, optimizing its capital structure, and increasing shareholder value. Key components of the project include the transfer of the İç Anadolu NGCCPP and the restructuring of the remaining financial debt at İzmir Termik through an alternative financing method.	Completion of Project NOVA; strengthening the strategic investment portfolio; advancing the Gökres-2 and Kırkağaç capacity expansion projects; scaling up Diwaco and maximizing asset value; and establishing a business development project pipeline across new geographies and platforms.	   
	Within Project NOVA, organizational and portfolio transformation initiatives were initiated, and efforts were undertaken to optimize the existing generation portfolio. European target market analyses were completed, M&A opportunities were assessed, and an entrepreneurial mindset was strengthened across the organization. Progress was made on the Gökres-2, Kırkağaç, and Diwaco capacity expansion projects, while preliminary feasibility studies were conducted for emerging technologies such as pumped-storage hydropower, floating solar PV systems, seawater desalination, and micro-hydropower plants. In addition, on September 17, 2025, GAMA Enerji’s first solar power plant, a 2.5 MWp/1.99 MWe facility aimed at reducing Diwaco’s electricity consumption, was commissioned.		
Digital Transformation and Artificial Intelligence	Digitalization projects were accelerated under the corporate digital transformation framework, and the development of the Data Warehouse and business intelligence infrastructure continued. Initiatives were undertaken to strengthen AI-supported decision-making processes, while employees’ digital capabilities were enhanced through AI literacy training. Cybersecurity infrastructure was strengthened, and data-driven management practices were expanded.	Completion of the Corporate Data Warehouse, broader implementation of process automation, and strengthening of a data-driven management approach.	  
Sustainability and Climate Change	Corporate preparedness activities were carried out regarding the ETS, the Carbon Border Adjustment Mechanism (CBAM), and carbon pricing mechanisms. Work began on developing an emissions reduction roadmap aligned with the Science Based Targets initiative (SBTi), while efforts continued to develop the sustainability roadmap and strengthen the ESG approach. Initiatives were implemented to enhance carbon footprint management, integrate sustainability performance into the corporate performance management system, and assess climate-related risks.	Developing a Net-Zero and emissions reduction roadmap; initiating short-term decarbonization actions; and integrating sustainability indicators into management reporting and performance evaluation processes.	  
Organizational Transformation and Corporate Culture	The DMWL program was restructured, and monthly meetings were held regularly. Employee engagement and internal communication were strengthened through initiatives such as Söz Sende and Inside Out. Initiatives aimed at increasing cross-functional collaboration were expanded, agile working practices were adopted, and employee participation in decision-making processes was encouraged. Efforts to strengthen transparent communication, leadership development, and organizational commitment continued.	Strengthening corporate culture, increasing cross-functional collaboration, enhancing employee engagement, and further developing corporate governance practices.	   
Human Capital and Talent Management	To strengthen the employee experience, initiatives including the NeoSkola learning platform, Heltia employee well-being applications, Mercer career development plans, WTW organizational development initiatives, Hiring Cycle AI, and Gamified Onboarding were implemented. The performance management system was enhanced, preparations for mentoring programs continued, and Diversity, Equity and Inclusion (DEI) initiatives and the Gender Equality Program were supported. Initiatives aimed at increasing employee engagement were expanded.	Retaining critical talent; expanding leadership and mentoring programs; strengthening employee engagement and experience; further developing diversity and inclusion practices; and expanding human resources initiatives that support the new organizational structure.	   
Social Contribution and Stakeholder Development	In line with the local development and social impact approach, initiatives including the Artı Değer (Surplus Value) Scholarship Program, Local Products Project, Magic Map, Aydınlanma Kitaplığı (Book Donation Project), GAMA Vocational School collaborations, university partnerships, and DMWL projects were implemented. Activities focused on education, volunteering, support for local producers, and stakeholder engagement continued.	Expanding social impact projects; strengthening partnerships in education and local development; increasing volunteering activities; enhancing stakeholder engagement; and expanding social benefit-oriented initiatives.	     

Sustainability and Climate Risks

GAMA Enerji considers sustainability and climate-related risks as an integral component of its corporate risk management system. The physical impacts of climate change, as well as regulatory, technological, and market-related risks that may arise during the transition to a low-carbon economy, are regularly analyzed, with their financial and operational impacts supported by scenario-based assessments.

Within the framework of the corporate risk management policy, the management of sustainability and climate-related risks is based on the following key principles:

- Systematically identifying sustainability-related risks and opportunities arising from internal and external sources
- Prioritizing risks through impact and likelihood assessments
- Developing risk mitigation strategies and implementing action plans
- Continuous monitoring through Key Risk Indicators (KRIs)
- Tracking risks through digital platforms and reporting them regularly
- Providing periodic information to Senior Management in line with the principles of transparency and accountability

Financial impacts and operational consequences are assessed together as part of the risk assessment process, and the resulting outputs are integrated into budget planning, investment decisions, and financial projections. In particular, drought, hydrological variability, extreme weather events, and fluctuations in energy markets are closely monitored due to their potential impacts on generation performance and cash flows.

The potential impacts of climate change and the energy transition are also incorporated into long-term strategic planning through scenario-based assessments. Under the coordination of GAMA Enerji’s Strategy and Business Development Department, long-term electricity price forecasting studies are conducted with external consultants, analyzing different scenarios. Based on these studies, long-term sets of assumptions are developed by considering key variables such as hydrological conditions (inflow assumptions), climate policies, renewable energy capacity expansions, and structural changes in energy markets. The resulting scenario outputs provide input into investment planning, financial projections, and strategic decision-making processes, contributing to the Company’s resilience to changing climate and market conditions.

To ensure the effective management of risks, Risk Assessment Criteria are used. When predefined threshold values are exceeded, “trigger points” and “breaking points” are activated, initiating additional assessment and response processes for the relevant risks. In addition, sustainability targets are integrated into the Company’s target scorecards, and the relevant performance indicators are monitored as part of the employee performance management system.

Key Sustainability and Climate Risks

As of 2025, the key sustainability and climate-related risks monitored by GAMA Enerji primarily include physical climate risks, transition risks associated with the energy transition, regulatory developments, and strategic risks that may affect operational continuity.

GAMA Enerji’s Priority Sustainability and Climate Risks in 2025

Risk Area	Risk Description	Key Control Activities	2025 Assessment
Hydrology and Renewable Generation Risk	Reduced electricity generation and potential revenue loss due to hydrological shortages at hydroelectric power plants and deviations from generation scenarios at wind power plants.	Continuous monitoring of hydrological and meteorological data, updating generation forecasts, and revising revenue projections.	Monitored as a high-likelihood priority climate risk.
Climate Technologies and Energy Transition Risk	Risk of inadequate adaptation to new technologies, environmental regulations, and the transition toward renewable energy in the shift to a low-carbon economy.	Wind capacity expansion, energy storage applications, and operational digitalization initiatives.	Monitored as a strategic priority transition risk.
Potential Payment Risk under the Emissions Trading System (ETS)	Potential additional carbon costs that may arise if carbon pricing or an Emissions Trading System is introduced in Türkiye.	Close monitoring of regulatory developments, emissions management activities, and preparations for potential legal obligations.	Considered one of the sustainability risks with the highest potential financial impact.
Global and Local Political Risks	Potential impacts of geopolitical developments, economic fluctuations, and regulatory changes on the investment environment and business activities.	Maintaining coordination with public institutions, monitoring international developments, and diversifying investments geographically.	Among the strategic risks regularly reported to Senior Management.
Cybersecurity Risk	Disruption to operational continuity resulting from cyberattacks targeting information technology infrastructure.	ISO 27001 Information Security Management System, penetration testing, firewalls, antivirus systems, and regular awareness training.	One of the operational risks continuously monitored in parallel with increasing digitalization.
Natural Gas Supply Risk	Disruption to natural gas supply due to geopolitical developments or supply interruptions.	Monitoring natural gas storage capacity, coordination with relevant public institutions, and assessment of alternative scenarios.	Closely monitored in terms of energy supply security.

Hydro and Renewable Generation Risk

One of the most significant climate risks for the Company's renewable energy portfolio is hydrological variability and uncertainty in generation resulting from changing climate conditions. In particular, changes in precipitation patterns and declining water availability at hydroelectric power plants can directly affect generation volumes. Similarly, deviations from generation scenarios at wind power plants may result in lower electricity generation. In addition, physical climate risks associated with climate change—including drought, flooding, extreme weather events, temperature variations, and wildfires—may place additional pressure on the operational continuity and generation performance of renewable energy facilities. Accordingly, in addition to hydrological conditions, meteorological developments and physical climate indicators are regularly monitored and integrated into operational planning.

To manage this risk, available hydrological data, meteorological forecasts, and generation performance are regularly monitored. Revenue projections are updated and generation plans are revised where necessary. In addition, based on climate risk assessments conducted at production plants, control mechanisms and adaptation measures addressing physical climate risks are continuously reviewed. In the 2025 assessment, the likelihood of this risk materializing continued to be considered high, and it remains among the Company's priority climate risks.

Climate Technologies and Energy Transition Risk

The transition to a low-carbon economy in the energy sector introduces significant requirements in terms of technological transformation, compliance with environmental regulations, and adaptation to sustainable production models. In this context, GAMA Enerji considers diversifying its renewable energy investments, continuing capacity expansion projects at wind power plants, developing hybrid solar PV projects, evaluating energy storage solutions, and increasing digitalization across operational processes among its key risk management measures.

As of 2025, although this risk had not resulted in a measurable financial impact, it continued to be considered a high-priority risk from an operational and strategic perspective.

Potential Payment Risk under the ETS

The potential introduction of carbon pricing mechanisms and an Emissions Trading System (ETS) in Türkiye is among the regulatory risks closely monitored by GAMA Enerji. In particular, considering Scope 1 emissions from natural gas-fired power plants, carbon costs could potentially affect operating expenses.

Following the exit of the İç Anadolu NGCCPP from GAMA Enerji's portfolio as of January 2026, this risk is no longer applicable to the current portfolio. Nevertheless, national and international carbon regulations continue to be closely monitored, and efforts to reduce emissions remain ongoing.

Global and Local Political Risks

Global economic developments, regional geopolitical risks, changes in national and international regulations, and volatility in energy markets are among the strategic risks regularly monitored by the Company. In particular, natural gas supply security, international trade conditions, and volatility in energy prices may affect operational planning.

Accordingly, global and regional developments are monitored regularly, close coordination with public institutions is maintained, and geographical diversification within the investment portfolio is taken into consideration.

Cybersecurity Risk

As digitalization accelerates, information security and cyber resilience remain among the Company's priority risk areas. Information technology infrastructure is regularly strengthened, while corporate cybersecurity capabilities are continuously improved through firewalls, antivirus systems, penetration testing, and practices implemented in accordance with the requirements of the ISO 27001 Information Security Management System. In addition, regular cybersecurity awareness training is provided to employees. These measures aim to protect information assets, ensure operational continuity, and prevent business disruptions arising from cyber incidents.

Natural Gas Supply Risk

Natural gas supply security is one of the strategic risks closely monitored by GAMA Enerji, particularly with regard to the operational continuity of combined-cycle gas turbine power plants. Geopolitical developments, fluctuations in international energy markets, potential supply chain disruptions, and volatility in natural gas prices may affect fuel supply, generation planning, and the cost structure.

To manage this risk, natural gas storage capacity is regularly monitored, coordination with relevant public institutions and suppliers is maintained, alternative supply scenarios are evaluated, and preventive planning is undertaken to support energy supply security. As of year-end 2025, natural gas supply risk remained among the operational and strategic risks closely monitored from an energy supply security perspective. However, following the exit of the İç Anadolu NGCCPP from GAMA Enerji's portfolio as of January 2026, this risk is no longer applicable to the current portfolio.

“

In addition to corporate-level risks, GAMA Enerji separately monitors and manages facility-specific physical and operational risks through dedicated risk registers for its hydroelectric, wind energy, and water infrastructure facilities. These risks include natural disasters, wildfires, earthquakes, floods, landslides, equipment failures, changes in water regimes, lightning-related damage, political interventions, and occupational health and safety incidents.

”



Sustainability and Climate-Related Opportunity Areas

GAMA Enerji does not view its sustainability approach as being limited to risk management. Instead, the Company considers new business models, technological developments, and investment opportunities arising from the transition to a low-carbon economy as important components of its strategic growth. Accordingly, opportunities with the potential to create environmental, operational, and financial value are systematically identified, analyzed, and regularly monitored within the corporate risk management system.

Within the Company, opportunities, like risks, are assessed based on criteria including impact, likelihood of realization, and potential value creation. Control activities are established for prioritized opportunities, and their development is monitored. Changes in opportunities over time are tracked through trend analyses, with increases or decreases of 10% or more reported through the system and incorporated into management decision-making. Through this approach, the Company aims not only to mitigate existing risks but also to proactively evaluate new investment and business development opportunities that can support sustainable growth.

GAMA Enerji’s opportunity portfolio comprises strategic areas that support the energy transition, including renewable energy technologies, energy storage solutions, hydrogen applications, energy efficiency projects, and operational optimization investments. In addition, compliance with carbon regulations, digitalization initiatives, and projects that improve resource efficiency are considered opportunities that can strengthen the Company’s long-term competitiveness.

GAMA Enerji’s Priority Sustainability and Climate-Related Opportunity Areas in 2025

Opportunity Area	Opportunity Description	Initiatives / Control Activities	Expected Contribution	Status (2025)
Hybrid Power Plants and Energy Storage	Increasing the utilization of existing grid connections and infrastructure through hybrid generation and energy storage solutions at existing renewable energy facilities, thereby increasing generation capacity and revenue	The hybridization and storage potential of the existing wind and hydropower portfolio was assessed, and technical, regulatory, and commercial feasibility studies were initiated for suitable projects.	Increasing capacity and generating additional revenue through existing infrastructure; optimizing generation in line with market conditions; and increasing portfolio flexibility.	Hybrid and storage opportunities were screened across the portfolio, potential projects for prioritization were identified, and feasibility studies were initiated.
Green Hydrogen Production	Producing green hydrogen within the Company for use in the generator cooling systems at the İç Anadolu NGCCPP and evaluating additional commercial applications supported by hybrid solar projects.	Technical and economic feasibility studies are being conducted, while production infrastructure, hybrid solar integration, and potential revenue models are being analyzed.	Reducing carbon emissions, improving operational efficiency, creating new revenue streams, and supporting the energy transition.	Feasibility studies are ongoing.
Pumped-Storage Hydropower System	Evaluating the installation of a pumped-storage hydropower system at the Karacaören 1&2 Dam.	Preliminary feasibility studies assess the suitability of existing infrastructure, storage capacity, and alternative technical designs.	Increasing grid flexibility, strengthening renewable energy integration, and supporting energy supply security.	The preliminary feasibility process is ongoing.
Additional Water Conveyance Line Project	Adding a Coanda-type intake structure and an additional pipeline to the existing regulator and water conveyance system to reduce water losses and labor-intensive maintenance activities and improve generation efficiency.	Technical assessments and operational analyses are being conducted, while existing system performance is monitored and necessary revisions are planned.	Improving water resource efficiency, utilizing flood flows, reducing maintenance requirements and OHS risks, and increasing hydropower generation performance.	Technical assessment and development activities are ongoing.

Green Hydrogen Solutions

Green hydrogen technologies are among GAMA Enerji's priority development areas. In this context, the Company is evaluating the production of green hydrogen in-house for use in the generator cooling systems at the İç Anadolu NGCCPP.

Technical and economic feasibility studies are being conducted for this opportunity, with detailed analyses of production infrastructure, investment costs, and potential revenue models. Green hydrogen solutions are considered a long-term strategic investment area supporting the Company's transition to a low-carbon energy system.

Pumped Storage Hydroelectric Systems

Energy storage technologies represent a critical opportunity area for the integration of renewable energy sources into the grid. Accordingly, GAMA Enerji is evaluating the feasibility of implementing a pumped-storage hydroelectric system at the Karacaören 1&2 Dam.

Pre-feasibility studies are assessing compatibility with the existing facility infrastructure, potential storage capacity, and alternative technical designs. If implemented, the project is expected to enhance grid flexibility, enable more effective management of renewable energy generation, and strengthen energy security.

Additional Transmission Line Project

The Additional Transmission Line Project aims to strengthen the existing transmission infrastructure at the Çakırlar Hydroelectric Power Plant (HPP) through the addition of a Coanda-type intake structure and pipeline. The project is intended to reduce potential water losses within the existing system and improve the efficiency of water resource utilization. It also aims to reduce maintenance requirements and labor-intensive maintenance activities.

Once operational, the additional transmission line is expected to reduce excess floodwater, improve operational efficiency, and support generation performance. Technical assessments and operational analyses for the project are ongoing, and as of year-end 2025, the opportunity was assessed as having a high likelihood of realization.

Strategic Contribution of Opportunity Management

GAMA Enerji's approach to managing sustainability- and climate-related opportunities aims not only to adapt to new technologies arising from the energy transition but also to strengthen the Company's long-term value creation capacity. Renewable energy investments, energy storage systems, hydrogen technologies, and infrastructure projects that enhance resource efficiency represent strategic development areas that strengthen operational resilience while supporting the Company's competitiveness in the transition to a low-carbon economy.

In line with this approach, opportunities are considered not only as potential investment areas but also as key components of climate change adaptation, resource efficiency, and sustainable growth. Through a systematic management approach, GAMA Enerji aims to capitalize on opportunities emerging from the evolving energy ecosystem and create long-term corporate value.

“

At GAMA Enerji, opportunities are also assessed within the corporate risk management system based on their impact, likelihood of occurrence, and potential value creation. Control activities are defined for prioritized opportunities, their progress is regularly monitored, and developments are tracked through management reporting.

”

Çakırlar HPP

Climate and Environment



Combating climate change, protecting natural resources, and effectively managing environmental impacts constitute an integral part of GAMA Enerji’s sustainable growth vision. The Company considers environmental sustainability not only as an element of its operational activities but also as a corporate responsibility area that guides decision-making processes. Practices aimed at enhancing resource efficiency, reducing environmental impacts, and continuously improving environmental performance are carried out through an integrated approach embedded in management systems and business processes.

Environmental management practices are implemented in line with the Sustainability Policy, Quality, Environment and Occupational Health and Safety Policy, and Energy Efficiency Policy. Reducing environmental impacts, using natural resources efficiently, preventing pollution, complying with legal requirements,

and continuously improving environmental performance constitute the fundamental principles of the Company’s environmental management approach. These principles guide the consistent implementation of environmental management practices across all operations and the systematic improvement of environmental performance.

“GAMA Enerji integrates the principles of environmental protection and sustainable development into the core of its corporate strategies and conducts all its operations in line with this approach.”

In line with this approach, environmental management processes across all production plants and offices are conducted in accordance with the ISO 14001 Environmental Management System. Based on a life-cycle approach, the environmental impacts of activities—from raw material procurement through operational processes—are regularly assessed, while improvement initiatives aimed at reducing environmental risks and enhancing resource efficiency are continuously implemented. Environmental performance is regularly monitored, and management systems are further developed and practices continuously improved based on the findings.

The environmental management system is implemented in accordance with national legislation as well as the IFC Performance Standards and EBRD Performance Requirements. Compliance with international standards is regularly monitored, while environmental and social performance is tracked through audit and reporting processes. In particular, practices implemented under the IFC Performance Standards are reviewed through annual assessment mechanisms, thereby supporting the effectiveness of the environmental management system and the continuity of its implementation.

Environmental sustainability activities are coordinated by The Sustainability, Quality, Environment, and OHS Directorate. The Directorate is responsible for the implementation of environmental management systems, certification processes, monitoring environmental permits and legal compliance, and coordinating greenhouse gas, water footprint, CDP, and environmental performance reporting, as well as compliance with IFC and EBRD requirements. In addition, the Department manages the corporate document and process management software, supporting the digitalization of business processes and contributing to environmental sustainability objectives by reducing paper consumption and enhancing operational efficiency. Improvement initiatives aimed at enhancing environmental performance across both headquarters and field operations, as well as activities designed to increase employee awareness, are also managed under the same coordination structure.

The effectiveness of the environmental approach supported by management systems is also monitored through performance results obtained from international reporting platforms. In 2025, GAMA Enerji received a B score in both the CDP Climate Change Program and the CDP Water Security Program, maintaining a B performance level for three consecutive reporting periods. In the same year, the Company responded to the CDP Biodiversity Program questionnaire for the first time, marking an important step toward integrating biodiversity into its environmental reporting processes. Key strengths highlighted in the CDP assessments included environmental policies, governance, risk and opportunity management, pricing of environmental externalities, emissions verification processes, and low-carbon products and practices.

The environmental sustainability approach is also supported through collaborations with universities, associations, and chambers of industry. These initiatives strengthen knowledge sharing, promote the dissemination of good practices, foster industry-wide collaboration, and support sustainable development objectives.

Environmental performance indicators are regularly monitored, and improvement initiatives continue to be implemented with a focus on compliance with legal requirements and effective management of environmental risks.

At the beginning of 2026, a portfolio change resulted in the transfer of the İç Anadolu NGCCPP to SOCAR Türkiye as of January 30, 2026. Accordingly, GAMA Enerji’s power generation portfolio has transitioned to a renewable energy-focused structure consisting of HPPs and WPPs. This portfolio change is expected to be considered as a change in reporting scope when assessing environmental performance indicators in subsequent reporting periods. Therefore, the impact of the change in portfolio scope should be taken into account when evaluating period-over-period differences in energy generation, greenhouse gas emissions, and other environmental performance indicators.

Combating Climate Change

Combating climate change is among GAMA Enerji’s priority areas that guide its sustainable growth approach. The Company implements practices supporting the transition to a low-carbon economy as part of its environmental management activities. Greenhouse gas emissions management, improving energy efficiency, expanding renewable energy investments, and assessing climate-related risks and opportunities constitute the key components of the Company’s climate management approach.

These activities are carried out in line with the Sustainability Policy and the Energy Efficiency Policy, which also aims to support the management of climate change. National legislation and international developments are regularly monitored and reflected in the Company’s practices.

Greenhouse gas emissions management, one of the key components of the climate management approach, is carried out within a management system established in accordance with the ISO 14064-1 standard. Emissions data are managed through defined data collection, calculation, control, and

reporting processes. The greenhouse gas inventory is prepared regularly and subject to independent verification. Accordingly, GAMA Enerji’s 2025 carbon footprint was calculated in accordance with ISO 14064-1 and independently verified. This enables climate performance to be monitored and reported in a transparent, reliable, and comparable manner.

In 2025, GAMA Enerji’s total greenhouse gas emissions amounted to 1,927,567.91 tCO₂e. Of this total, 1,443,638.46 tCO₂e were Scope 1 emissions, 137,638.82 tCO₂e were Scope 2 emissions, and 346,290.63 tCO₂e were Scope 3 emissions.

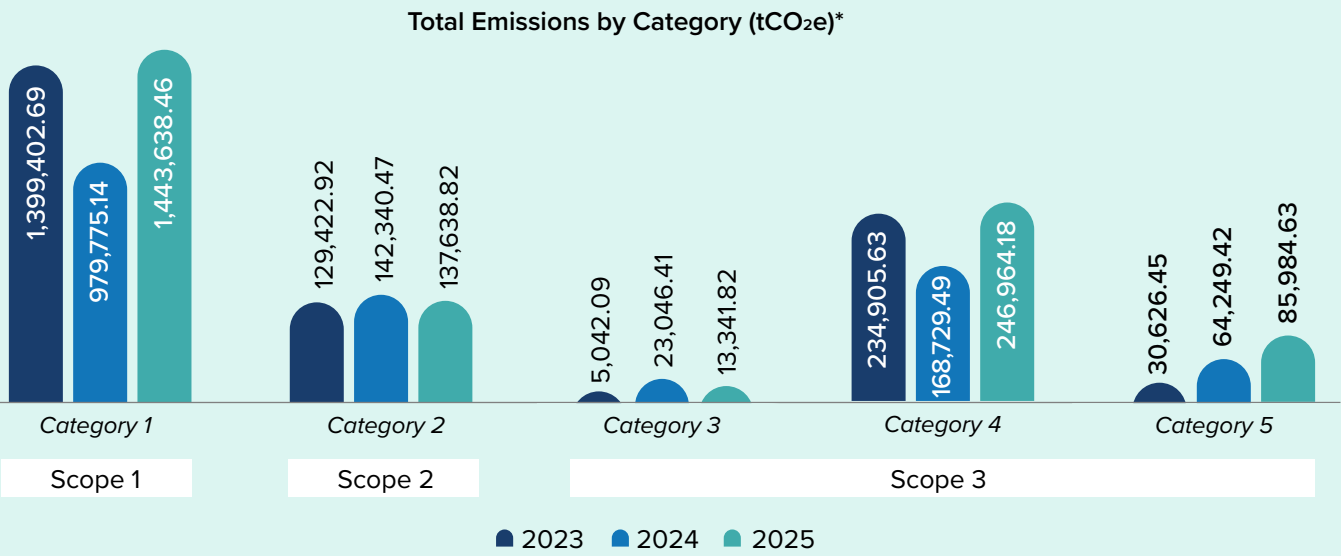
The management of greenhouse gas emissions is also supported by international carbon crediting and certification mechanisms. As of 2025, approximately 77 thousand tonnes of CO₂e in verified emission reductions were generated under the Gold Standard (GS) for the Çakırlar HPP and Sares WPP. These verified reductions demonstrate the contribution of GAMA Enerji’s renewable energy investments to combat climate change.

The financial and operational impacts of climate change are also assessed as part of the corporate risk management processes. Developments related to carbon pricing mechanisms, the planned implementation of the ETS in Türkiye, and the risks and opportunities arising from the transition to a low-carbon economy are regularly monitored and taken into account in strategic decision-making processes. This approach supports the enhancement of the Company’s capacity to adapt to evolving climate policies and the long-term management of climate-related risks.

GAMA Enerji’s climate change mitigation efforts continue to be developed in line with its long-

term corporate objectives. In this context, taking into consideration the Company’s portfolio, which transitioned to a renewable energy-focused structure in 2026, and its priority sustainability topics, the Sustainability Roadmap is planned to be updated, low-carbon technologies are expected to be further expanded, and climate targets are planned to be more strongly integrated into decision-making processes. The Sustainability Committee has recommended setting carbon intensity and absolute emissions reduction targets for the 2026–2030 period. Based on the new portfolio structure following the exit of the İç Anadolu NGCCPP, the base year and emissions reduction targets are planned to be finalized in 2026, with the defined targets subsequently to be assessed within the framework of the Science Based Targets initiative (SBTi). In addition, efforts to expand low-carbon technologies and further integrate climate targets into decision-making processes are expected to continue.

In 2025, GAMA Enerji calculated its carbon footprint in accordance with ISO 14064-1 and had it independently verified.



*Category 1 refers to Scope 1 direct emissions arising from sources owned or controlled by the organization; Category 2 refers to Scope 2 indirect emissions arising from purchased energy; Category 3 covers transportation and distribution; Category 4 covers purchased products and services; and Category 5 refers to other Scope 3 indirect emissions associated with the use of sold products.



Energy Management

Efficient energy use, enhanced operational efficiency, and reduced environmental impacts are among GAMA Enerji’s priority areas in line with its environmental sustainability objectives. Accordingly, the Company manages energy as an integrated process that enhances resource efficiency, supports operational performance, and contributes to the transition to a low-carbon economy. Energy consumption at production plants and offices is regularly monitored, significant energy users are identified, energy performance is assessed, and continuous improvement initiatives are implemented.

Throughout 2025, energy management practices were carried out in accordance with the ISO 50001 Energy Management System, with energy consumption data regularly analyzed and initiatives aimed at improving energy performance supported through an integrated management system approach.

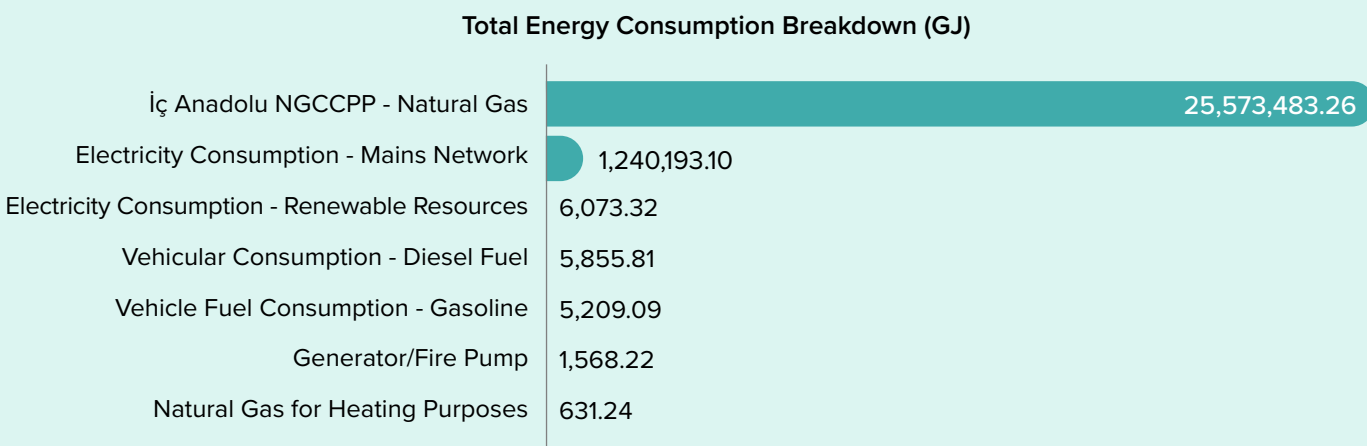
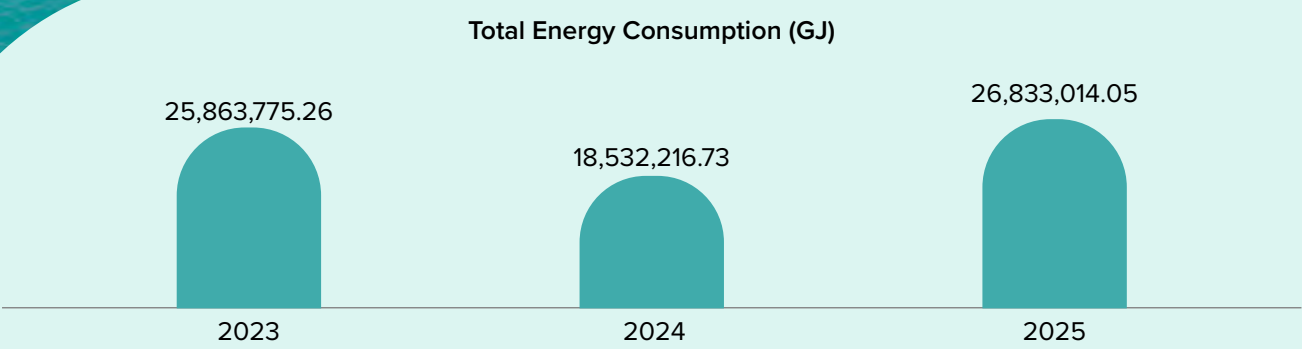
To improve energy performance, significant energy users at production plants and offices are regularly analyzed. Heating, Ventilation and Air Conditioning (HVAC) systems, lighting infrastructure, and high-energy-consuming equipment are considered among the priority areas for improvement. Automation applications and optimization of operating hours are being implemented for HVAC systems, while LED conversions and motion sensor-based control applications in lighting systems are aimed at reducing energy consumption. The outcomes of these initiatives are regularly monitored through Energy Performance Indicators (EnPIs) and assessed in line with the principle of continuous improvement.

Energy management processes are supported by a SCADA-based digital monitoring infrastructure. Energy consumption data are monitored in real time across power plants and headquarters operations, and the data obtained are used for maintenance planning, operational improvement initiatives, and energy performance assessments. Facility-level analyses enable opportunities to improve energy efficiency to be systematically identified.

As a result of the monitoring and assessment activities carried out in this context, GAMA Enerji’s total energy consumption amounted to 26,833,014.05 GJ in 2025. Of the total energy consumption, 25,574,114.50 GJ was attributable to natural gas, 1,240,193.10 GJ to electricity purchased from the grid, 6,073.32 GJ to electricity generated from renewable sources, 1,568.22 GJ to fuel consumed by generators and fire pumps, 5,855.81 GJ to diesel, and 5,209.09 GJ to gasoline.



Lamas III-IV HPP



When the distribution of energy consumption by facility is analyzed, it is observed that a significant portion of total consumption was attributable to the İç Anadolu NGCCPP operations, which used natural gas. Energy consumption at HPPs, WPPs, Diwaco,

and offices is also monitored separately, and opportunities for improvement aimed at enhancing energy performance are identified based on facility-level assessments.

2025 Energy Consumption (GJ)

İç Anadolu NGCCPP	25,575,853.42
Diwaco	1,246,613.46
Karacaören 1 HPP	1,738.78
Karacaören 2 HPP	1,469.32
Gökres 2 WPP	1,371.61
Çakırlar HPP	1,248.92
Kırkağaç WPP	1,016.56
Ankara Office	984.05
Sares WPP	903.57
Lamas III-IV HPP	884.85
Karadağ WPP	691.18
İstanbul Office	238.35

2025 Energy Consumption Excluding İç Anadolu NGCCPP and Diwaco (GJ)

Karacaören 1 HPP	1,738.78
Karacaören 2 HPP	1,469.32
Gökres 2 WPP	1,371.61
Çakırlar HPP	1,248.92
Kırkağaç WPP	1,016.56
Ankara Office	984.05
Sares WPP	903.57
Lamas III-IV HPP	884.85
Karadağ WPP	691.18
İstanbul Office	238.35

The energy management approach encompasses not only monitoring current performance but also evaluating new technologies and alternative energy solutions that can improve energy efficiency. As part of the preliminary feasibility studies for a pumped-storage hydropower system at the Karacaören 1&2 Hydroelectric Power Plants, technical and economic assessments are being conducted to optimize generation, enhance grid stability, and support the integration of renewable energy. A revenue model has also been developed, and investment alternatives have been analyzed based on proposals received from different pump manufacturers. In addition, alternative hydrogen technology solutions that could be used in the generator cooling systems at the İç Anadolu NGCCPP are being evaluated.

At the Diwaco facility in Jordan, the commissioning of a 2.5 MWp / 1.99 MWe solar power plant enables part of the facility's electricity demand to be met from renewable energy sources. This contributes to reducing energy costs, strengthening operational sustainability, and supporting the company's carbon reduction targets. These initiatives represent key practices that support the evaluation of innovative technologies and the transition toward a low-carbon energy system.

GAMA Enerji continues to enhance its energy management practices with a focus on digitalization, energy efficiency, and innovative technologies. The continuous improvement of energy performance in operational processes, the expansion of energy efficiency investments, and the evaluation of emerging technologies remain among the company's key priorities for the coming period.

Water Management

The conservation and efficient use of water resources, together with the effective management of impacts on water resources, are among the key priorities of GAMA Enerji's environmental sustainability approach. The Company regards water management not merely as an operational requirement, but as a strategic management area that supports the responsible use of natural resources. Activities aimed at monitoring water consumption, calculating the water footprint, developing water reuse practices, and improving water efficiency are carried out in an integrated manner with corporate processes.

This approach is supported by corporate processes established in accordance with the ISO 14046 Water Footprint Standard. Water consumption data from production plants and offices are regularly collected, calculated, and reported annually. The data obtained are used in water footprint calculations, improvement initiatives, and international reporting processes, thereby supporting the continuous monitoring of water performance and the ongoing enhancement of water management practices.

In 2025, GAMA Enerji's total water withdrawal amounted to 643,263,314.09 m³. Of the total water withdrawal, 526,257,914 m³ was sourced from surface water sources, 117,000,528 m³ from groundwater sources, 4,718.60 m³ from the municipal water supply, and 153.49 m³ as drinking water. During the same period, a total of 630,633,032.49 m³ of water was discharged.

GAMA Enerji regularly calculates water footprint indicators to monitor its impacts on water resources in a more comprehensive manner. In this context, the total blue water footprint was calculated as 129,610,857.80 m³/year in 2025.

Practices aimed at improving the efficient use of water resources are also implemented across operational processes. Potable and utility water systems undergo periodic maintenance, improvements are implemented to prevent potential water losses, and

water consumption is regularly monitored. As part of its 2025 activities, GAMA Enerji supported water recovery at the İç Anadolu NGCCPP by treating and reusing process water, thereby contributing to reducing pressure on water resources. In addition, alternative practices that support more efficient water use are being evaluated. Through the Karacaören-1 Floating Solar PV Project, the Company aims to enable the multipurpose use of the existing reservoir area, support hybrid energy generation infrastructure, and reduce evaporation from the reservoir surface.

The Company's water management approach also includes raising awareness among employees and stakeholders regarding water efficiency.

GAMA Enerji continues to enhance its water management practices within the framework of long-term objectives set out in its Water Footprint Roadmap. Under the roadmap, the Company aims to develop digital data management infrastructure to support more effective monitoring and management of water-related data. In the coming period, the Company plans to conduct ISO 14046 verification studies, prepare a water reduction strategy, and continue efforts to monitor long-term water reduction targets. Through these initiatives, GAMA Enerji aims to further develop its water management practices through data-driven approaches and systematically implement its long-term objectives.



Waste Management

Waste management is one of the key components of GAMA Enerji’s environmental management approach, which focuses on the efficient use of natural resources, reducing environmental impacts, and supporting the circular economy. The Company prioritizes preventing waste generation, reducing waste at source, and expanding reuse and recycling practices, while ensuring that generated waste is managed in compliance with environmental legislation. Activities at production plants and the headquarters are carried out through an integrated management approach that promotes resource efficiency and the reduction of environmental impacts.

In line with this approach, waste management practices are implemented within the framework of defined corporate procedures. The Zero Waste Management System is implemented at all production plants and the headquarters in Türkiye. Recyclable waste is separately collected at source and sent to licensed recovery facilities. The temporary storage, transportation, recovery, and disposal of hazardous and non-hazardous waste are carried out in accordance with applicable environmental legislation and company procedures. The procurement, use and

storage of chemicals, as well as the management of waste generated throughout these processes, are carried out in accordance with the Zero Waste Procedure, Procurement Procedure, Process Control Procedure, Emergency Procedure, and OHS and Environmental Control Procedures.

Waste management performance is assessed through regularly monitored indicators. Data on the quantity and composition of waste generated provide input for initiatives aimed at improving resource efficiency and enhancing waste management processes.

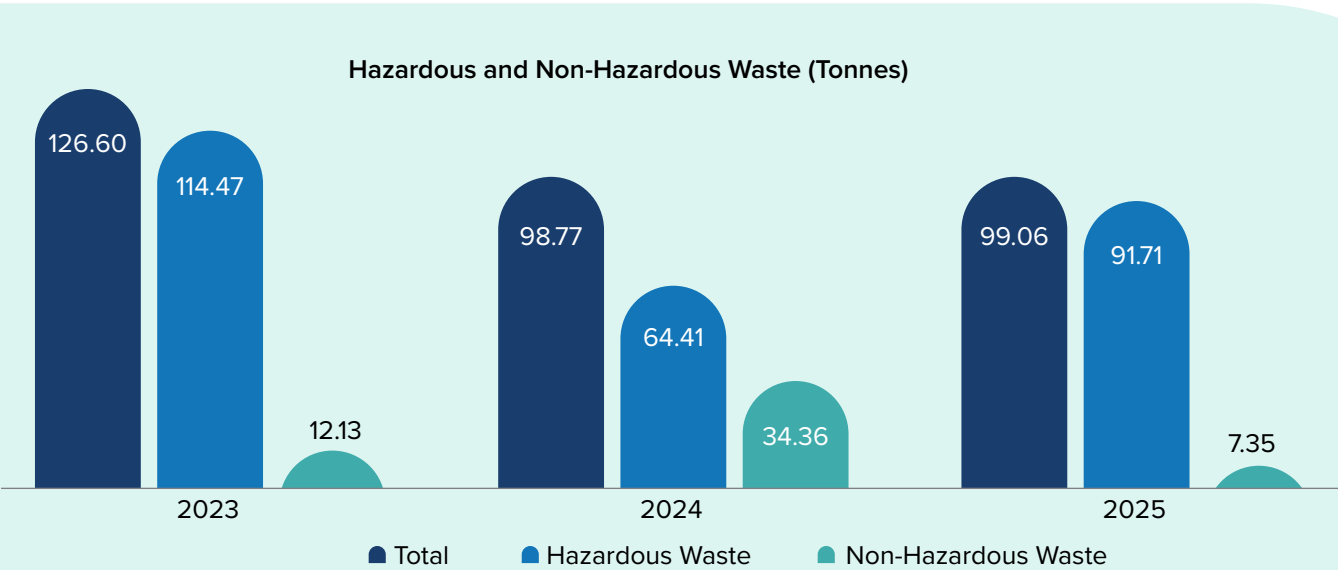
In 2025, GAMA Enerji’s total waste generation amounted to 99.06 tonnes. Of this total, 91.71 tonnes consisted of hazardous waste, while 7.35 tonnes consisted of non-hazardous waste.

The 2025 waste profile indicates that waste generated from operational activities primarily originated from maintenance and operational processes. A significant proportion of hazardous waste consisted of absorbents and filter materials contaminated with hazardous substances, oil filters, hydraulic oils, and packaging contaminated with hazardous substances, while non-hazardous waste mainly comprised paper and cardboard, plastic, glass, metal, and mixed packaging waste. Regular assessment of waste composition supports improvement initiatives aimed at reducing waste generation and enhancing resource efficiency.

To minimize the environmental impacts of waste, recovery and disposal processes are carried out

using methods appropriate to the nature of each waste stream. Recyclable paper and cardboard, plastic, glass, metal, and packaging waste are directed to licensed recovery facilities for reprocessing and reintegration into the economy. Hazardous waste generated from operational activities is subject to recovery or disposal processes at licensed facilities in accordance with applicable legislation. This approach supports the efficient use of natural resources while contributing to the advancement of the circular economy.

In line with the continuous improvement approach, GAMA Enerji continues to enhance its waste management practices. Expanding source-separation practices, increasing recovery rates, improving processes to reduce waste generation, and developing resource-efficiency initiatives remain among the Company’s key priorities for the coming period.



Biodiversity

The protection of biodiversity and the sustainability of ecosystem services are among the key priorities of GAMA Enerji’s environmental management approach. Across all sites where the Company operates, the protection of natural habitats, monitoring of sensitive species, and preservation of ecosystem integrity are prioritized. Biodiversity management is carried out in accordance with national legislation and IFC Performance Standard 6. Biodiversity assessments are supported by scientific data, while measures to prevent potential impacts arising from operations and protect natural ecosystems are implemented through a systematic approach.

Biodiversity assessments are integrated into environmental decision-making mechanisms from the early stages of project development. Flora and fauna inventories, habitat characteristics, ecosystem services, and site-specific environmental risks are assessed, and protection and monitoring measures are planned based on the findings. The protection of sensitive species, preservation of habitat integrity, and minimization of potential impacts arising from operations are considered integral components of project planning processes.

As part of the activities carried out in 2025, biodiversity baseline assessment reports were completed for the Sares Hybrid Solar Power Plant and Karacaören 1&2 Hydroelectric Power Plants. Flora and fauna inventories were prepared, endemic and protected species were identified, habitat types were characterized, and the ecological features of the project sites were assessed. In addition, potential impacts on ecosystem services, critical habitats, and biodiversity were evaluated, and site-specific conservation and management recommendations were developed.

Biodiversity management is not limited to project development activities but is also supported by monitoring activities carried out during the operational phase. As part of the biological monitoring studies conducted at the Karacaören 1&2 Hydroelectric Power Plants, terrestrial and aquatic ecosystems are regularly monitored, together with changes in flora and fauna species and habitat characteristics. Based on the findings, protective and remedial measures are

planned to support the long-term sustainability of ecosystems.

The protection of aquatic ecosystems is also an important component of biodiversity management. At hydroelectric power plants, monitoring and assessment activities are conducted regarding water regimes, habitat continuity, and water quality, while practices supporting the continuity of natural ecosystems are maintained. Efforts to protect local plant species and sustainably manage natural habitats are carried out in cooperation with relevant institutions and stakeholders.

Biodiversity management is further supported by activities aimed at strengthening employees’ environmental awareness, in addition to site-level practices. Biodiversity performance is regularly monitored through the Annual Monitoring Report submitted to IFC and as part of environmental and social reporting processes and is assessed against international performance criteria.

GAMA Enerji continues to enhance its biodiversity management practices through science-based assessments and regular monitoring activities. Expanding habitat monitoring activities, strengthening conservation measures for sensitive species, enhancing assessments of ecosystem services, and more effectively integrating biodiversity criteria into project development processes are among the Company’s priority areas for the coming period.



Karacaören 1 HPP



Social Sustainability



Human Resources Approach

GAMA Enerji manages its human resources practices in line with the principles of fairness, transparency, and equality, with the aim of supporting employee satisfaction, employee experience, and organizational development. Protecting employee rights, developing competencies, and supporting employee well-being are among the key elements of the Company's human resources approach. Accordingly, the Company strives to provide equal opportunities to all employees and ensure that working conditions are implemented in a clear, consistent, and fair manner.

GAMA Enerji conducts its activities in alignment with the United Nations Universal Declaration of Human Rights, International Labour Organization (ILO) Conventions, IFC Performance Standards, and applicable national legislation. The Company adopts a “zero tolerance” approach to forced labor and child labor and considers the prevention of any form of involuntary labor a fundamental human rights responsibility. Employees' rights to organize and form or join trade unions are respected, and the Company supports the protection and free exercise of these rights.

GAMA Enerji's workforce profile is structured around diversity, competencies, and expertise to support its sustainable growth objectives. As of year-end 2025, a total of 556 people were employed across operations in Türkiye and abroad. Women accounted for 18.4% of direct employees, while the proportion of women employees at the Ankara and Istanbul offices was 50%. In terms of organizational structure, 40.21% of employees held white-collar positions, while 59.79% held blue-collar positions.

GAMA Enerji's human resources practices are implemented through an inclusive and equal-opportunity-based approach that takes into account employees' diverse characteristics, including age, gender, length of service, job type, and geographical distribution. Accordingly, the Company aims to strengthen employee engagement, support workforce diversity, and foster a sustainable corporate culture.

GAMA Enerji's workforce consists of a diverse employee profile comprising head office employees, white- and blue-collar employees working at power plants, and contractor personnel. Throughout the year, employee performance was monitored in a more systematic and objective manner through interim evaluations and target-setting update meetings, with individual and team development areas identified accordingly. In certain business units, regular activity and status reports strengthened information sharing with employees, supported transparency, and contributed to a work culture focused on continuous improvement. In promotion processes, competency assessments are conducted to identify employees' strengths and development needs, and individual development plans prepared accordingly are monitored by the Human Resources Directorate and relevant managers. In addition to financial and operational indicators, environmental

and social impact criteria are also taken into account in performance evaluation processes. Contributions to sustainability-focused projects, initiatives aimed at reducing environmental impacts, and social responsibility activities are integrated into the performance evaluation system.

At GAMA Enerji, compensation practices are managed in accordance with the principles of fairness, transparency, and competitiveness. The principle of “equal pay for equal work” is applied in compensation processes, with salary levels determined based on employees' competencies, experience, performance, and the responsibilities associated with their roles. Discrimination based on factors such as gender, age, ethnic origin, belief, physical appearance, or minority status is not permitted. The compensation policy is regularly reviewed in consideration of market conditions and internal pay equity, while equal opportunity is maintained across recruitment, compensation, and promotion processes.

Subject to Company performance and not necessarily implemented every year, bonus payments may be provided to employees with the approval of the Board of Directors. In addition, employees in director-level and above positions are provided with company vehicles and fuel support.



“

GAMA Enerji strives to provide equal opportunities to all employees and ensure that working conditions are implemented in a clear, consistent, and fair manner.

”

Employee Satisfaction

GAMA Enerji has established structured management mechanisms to support the effective, consistent, and transparent implementation of its human resources policies and practices. In this context, roles and responsibilities related to human resources processes are clearly defined, and policies and procedures concerning recruitment and other human resources practices are made accessible to current and prospective employees.

Employees are provided with secure channels through which they can communicate their views, suggestions, complaints, and notifications regarding policy violations. Confidentiality is maintained throughout reporting processes, and measures are taken to ensure that employees are not subjected to any pressure, threats, or retaliation. A zero-tolerance approach is adopted toward retaliatory or threatening behavior, and reports received are assessed in accordance with relevant procedures, with necessary actions taken accordingly.

GAMA Enerji adopts a zero-tolerance approach toward all forms of physical, psychological, sexual, and verbal harassment and abuse. To support a safe, respectful, and inclusive working environment, practices aimed at preventing, reporting, and effectively managing incidents of violence and harassment are implemented in accordance with applicable legislation and Company policies and procedures.

In 2025, rather than conducting the traditional employee engagement survey, GAMA Enerji conducted a “Culture Survey” focused on comprehensively assessing the current organizational culture and the culture targeted for the future. The survey was conducted in collaboration with independent consultancy firm Willis Towers Watson (WTW), with the aim of gathering employee views and feedback and

identifying the organization’s strengths and areas for improvement. The findings are intended to serve as a key input for developing action plans aimed at improving the employee experience, strengthening leadership practices, and establishing a sustainable and inclusive corporate culture.

GAMA Enerji implements various practices to support employees’ work-life balance and overall well-being. Employees are provided with one day of leave during their birthday month and two days of personal leave per year. Hybrid and flexible working arrangements continue at the head office, supporting employees in maintaining a balanced approach to their professional and personal lives. In 2025, the Memotive platform was introduced to strengthen communication, collaboration, and organizational interaction among employees. The platform aims to enhance employee experience, encourage knowledge sharing, and support employee engagement. In addition, the Heltia Employee Assistance Program is implemented to support the physical and psychological well-being of employees and their family members. The program provides psychological counseling, physical health support, postpartum mentoring services, and supportive services for family members. These practices aim to facilitate access to support services that employees and their families may need and promote holistic well-being.

GAMA Enerji encourages employees to participate in various social, cultural, and sporting activities to strengthen communication outside the workplace, reinforce team spirit, and enhance motivation. These activities aim to increase interaction among employees, strengthen organizational belonging, and foster social connections within the workplace. Employees are also encouraged to participate in sporting events to promote healthy living and physical activity. In this context, employees from different departments represented the Company at the RUNKARA Half Marathon, while a Cycling Event encouraged employees to spend time in nature. In addition, the GAMA Enerji Football Team, established voluntarily by employees, regularly engages in sporting activities, contributing to stronger team spirit and internal solidarity.

Social interaction among employees is further

supported through activities such as a Backgammon Tournament, while Online Word Games and Quiz Nights provide opportunities for employees to spend enjoyable time together and develop collaborative and problem-solving skills. Various commemorative and awareness-raising activities are also organized to uphold shared values and strengthen organizational unity. As part of these activities, employees visited Anıtkabir on November 10, Atatürk Commemoration Day, supporting opportunities for employees to come together around shared values and strengthening their sense of organizational belonging.

Through these practices supporting work-life balance and strengthening organizational belonging, GAMA Enerji aims to maintain a working environment characterized by strong social interaction, team spirit, and continuous improvement of the employee experience.



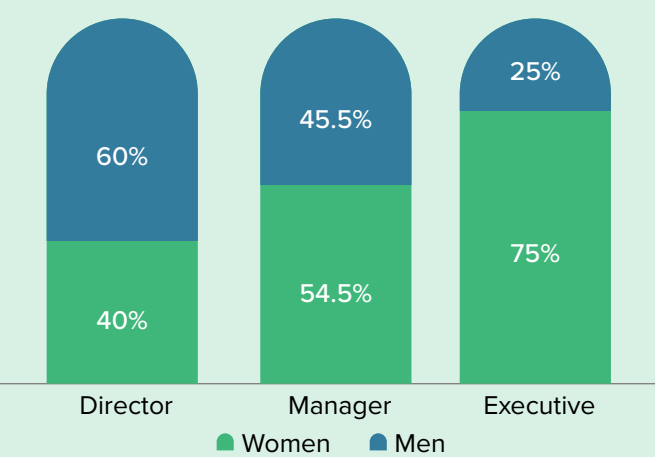
Diversity, Equity and Inclusion

GAMA Enerji places strong emphasis on developing a workplace culture based on diversity and inclusion. In line with the Human Resources Management Policy, preventing discrimination, ensuring equal opportunities, and addressing differences through an inclusive approach are among the Company’s fundamental principles. While aiming to strengthen mutual respect, fairness, and inclusion in the workplace, the Company provides a safe, supportive, and equitable working environment for all employees.

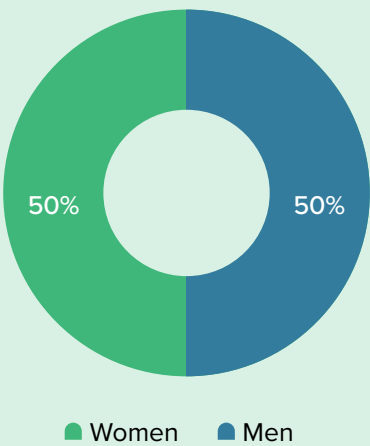
The principle of equal opportunity is applied across all human resources practices, including recruitment, training and development, performance management, compensation, benefits, and separation processes. Regardless of race, belief, age, gender, marital status, physical appearance, or other individual characteristics, all employees are supported in participating in working life on the basis of freedom, dignity, and economic security. In line with this human rights-based approach, GAMA Enerji continues its efforts to strengthen an inclusive workplace culture.

GAMA Enerji considers supporting women’s participation in the workforce and career development an important component of its human resources approach. The principle of equal opportunity is applied in compensation, promotion, and career development processes, with all assessments conducted on the basis of performance and competencies. The Company encourages greater representation of women in decision-making mechanisms and management positions. As of 2025, women accounted for 40% of employees in director-level positions, 55% of employees in manager-level positions, and 75% of employees in executive positions at the Istanbul and Ankara offices.

Women and Men Employee Rate by Management Position at Head Offices in 2025



Women Employee Rate at Head Offices in 2025



Various initiatives were implemented throughout 2025 to strengthen the culture of diversity and inclusion. Training and awareness-raising activities were organized for employees to increase corporate awareness of gender equality. A special training session held in March for International Women’s Day, together with an internal training program conducted in December, strengthened organizational awareness of equality principles and inclusive workplace practices.

Practices based on equal opportunity in recruitment, promotion, and career development processes continued, alongside efforts to further strengthen an inclusive and diversity-supportive working environment. As of 2025, women represented 18.4% of directly employed employees, while this ratio reached 50% at the Ankara and Istanbul offices. Initiatives aimed at increasing women’s participation in the workforce and strengthening their representation at management levels will continue in the coming period.

The Human Resources Management Policy covers fundamental principles including preventing discrimination, promoting equal opportunity, strengthening diversity and inclusion, preventing forced labor and child labor, improving working conditions, and establishing effective communication mechanisms through which employees can express their views and provide feedback. In line with this approach, GAMA Enerji aims to foster an inclusive corporate culture in which all employees feel valued and respected, while considering a people-centered approach to be a fundamental component of sustainable growth and organizational development.

“While aiming to strengthen mutual respect, fairness, and inclusion in the workplace, the Company provides a safe, supportive, and equitable working environment for all employees.”



Talent Management and Career Development

At GAMA Enerji, a culture of continuous learning that supports employee development is considered a fundamental component of the Company’s human resources approach. Accordingly, a learning culture that enables employees to develop their knowledge, skills, and competencies is encouraged, while a lifelong learning approach is supported. The Company recognizes that individual development and professional advancement contribute to organizational success and sustainable growth.

As part of its talent management practices, GAMA Enerji aims to develop employee competencies, match the right talent with suitable positions, and make the most effective use of existing potential. Recruitment processes are therefore conducted through a transparent, fair, and structured approach, with candidates’ competencies, experience, and position requirements assessed from a holistic perspective. This approach, which supports the sustainable strengthening of human capital, aims to attract talent aligned with organizational needs.

Following recruitment, employee development continues to be supported through a range of training and development programs. Various initiatives covering technical knowledge, leadership, and personal development are implemented to strengthen employee competencies, while career planning processes provide opportunities that contribute to employees’ professional growth. Throughout 2025, in addition to mandatory training, various learning and development activities were carried out to support employees’ professional, technical, and personal development. Training plans took into consideration the Company’s strategies, business objectives, and employees’ development needs.

During the year, an Agile training program was organized to promote an agile culture across the organization, with the aim of strengthening employees’ ability to adapt to changing business conditions, enhancing cross-functional collaboration, and improving operational efficiency. In addition, employees were provided with access to the NeoSkola online learning platform to support continuous learning. Employees were encouraged to improve their knowledge and competencies by benefiting from the platform’s diverse content in line with their individual interests and development objectives.

Various training programs were organized for all employees in line with the Company’s objectives and sustainability priorities. These programs aimed to strengthen employees’ competencies in areas including technological transformation, diversity and inclusion, sustainability, resilience, and communication. In addition, various technical and professional development programs were implemented to enhance employees’ industry knowledge, strengthen occupational health and safety awareness, and develop technical expertise.

The employee training programs conducted by GAMA Enerji during 2025 are summarized on the side.

2025 Employee Trainings



Corporate Development

- Artificial Intelligence in the Corporate World
- Gender Equality
- Climate Change: Causes and Solutions
- Discovering Your Inner Strength in Challenging Times
- Effective Negotiation Skills



Technical and Professional Development

- Introduction to Electricity Markets Training
- GWO BST (Basic Safety Training)
- Working at Height Training
- GWO Blade Repair Training



Through these training programs, GAMA Enerji aims to enhance the technical knowledge and skills of employees working particularly in the renewable energy field, support operational excellence, and strengthen occupational health and safety performance. Training and development activities are designed to encompass not only current employees but also future talent. Accordingly, various internship programs are implemented to attract young talent to the Company and support their professional development. Under the Joint Education Program conducted in cooperation with TOBB University of Economics and Technology, long-term internship opportunities lasting 70 working days are offered on three terms each year. For students from different universities, summer internship programs lasting 20–25 working days are organized at the head offices. In addition, periodic internship opportunities are provided at the İç Anadolu NGCCPP Plant for vocational high school and vocational college students. Students who demonstrate strong performance in the long-term internship programs at the head offices are supported with part-time employment opportunities, with the aim of transitioning successful participants into full-time employment.

One of the key practices supporting employee development is the performance management system. The system is implemented through a holistic approach aimed at evaluating employee contributions, identifying areas for development, and aligning individual objectives with corporate goals. Processes covering goal setting, monitoring, review, and evaluation are tracked through the Feedback4e digital platform, with the Human Resources Directorate, managers, and employees actively participating throughout the process. Following the establishment of corporate objectives at the beginning of the year, individual objectives were defined and recorded in the system. Objectives are established in accordance with the SMART principles and structured so that their total weighting equals 100%. This approach supports the clear and measurable definition of performance expectations.

During mid-year performance review meetings, progress against objectives was reviewed and objectives were updated where necessary. At year-end, final performance results were established based on mutual evaluations conducted by employees and managers. Performance evaluations adopted a multidimensional approach, taking into account not only the achievement of objectives but also attitudes and behaviors and alignment with corporate values. The results were assessed using a five-level scale ranging from “Below Minimum Expectations” to “Exceptional Performance.”

To support performance management and employee development initiatives, a total of USD 41,848 was invested in training and development activities in 2025. These activities are intended to strengthen employees’ existing competencies and equip them with the skills required for the future, thereby contributing not only to individual development but also to the Company’s long-term sustainability objectives.

“These activities are intended to strengthen employees’ existing competencies and equip them with the skills required for the future, thereby contributing not only to individual development but also to the Company’s long-term sustainability objectives.”



Occupational Health and Safety

GAMA Enerji regards the health and safety of its employees and all parties affected by its activities as a fundamental corporate value and an integral component of its sustainability strategy. The Company implements this people-centered approach not only through full compliance with national legislation but also through a management framework aligned with the ISO 45001 Occupational Health and Safety Management System, the International Finance Corporation (IFC) and European Bank for Reconstruction and Development (EBRD) Performance Standards, and the principles of the International Labour Organization (ILO). The ultimate objective is to establish a mature safety culture in which accidents and occupational diseases are prevented at their source and healthy and safe working conditions are continuously maintained across all operations.

Occupational health and safety (OHS) is addressed by senior management as a priority strategic issue. This commitment is demonstrated through visible leadership practices, regular OHS performance assessments, and site inspection meetings. All of the Company's generation assets and headquarters are ISO 45001 certified, and operations are conducted in accordance with the Quality, Environmental and OHS Policy and all applicable legal requirements. Systematic hazard identification and risk assessment form the basis of the preventive approach, while risk assessments, management of change practices, and the planning of corrective actions are addressed holistically within this framework.

GAMA Enerji addresses occupational health and safety through a comprehensive reporting approach aligned with the governance, strategy, risk management, metrics, and target structure adopted under IFRS S1 and S2 (ISSB). Under Governance, OHS is managed under the direct oversight and responsibility of senior management, with performance monitored through regular assessments and site inspection mechanisms.

Under Strategy, occupational health and safety is integrated into the business model and decision-making processes as a material sustainability topic; a safe and healthy working environment is positioned as a fundamental condition for operational continuity and the Company's license to operate. Under Risk Management, OHS hazards are identified, assessed, and prioritized in an integrated manner within the enterprise risk management framework and mitigated through preventive and corrective actions. Under Metrics and Targets, performance is monitored using internationally recognized indicators, particularly the Lost Time Injury Frequency Rate (LTIFR), and tracked against annual OHS targets. Quantitative values and targets for these indicators are presented separately in the OHS performance indicators section of the report.

Beyond regulatory compliance, GAMA Enerji adopts a behavior-based safety approach centered on employees' ability to identify and prevent risks proactively. Accordingly, basic OHS training appropriate to the nature of activities is provided at all locations, while power plants provide role-





“GAMA Enerji regards the health and safety of its employees and all parties affected by its activities as a fundamental corporate value and an integral component of its sustainability strategy.”

specific technical training and on-the-job practices tailored to their respective risk profiles. Training programs cover legislation and employee rights, activity-specific risk factors and safe working methods, emergency response, and employee health protection. These programs are planned using regular needs assessments and delivered through both internal and external resources. Participation of suppliers and contractors in these programs is also supported.

In 2025, OHS training activities resulted in a total of 1,939 cumulative participants, with employees receiving 7,033 hours of training. These activities are aimed at enhancing employees' knowledge and awareness and strengthening the safety culture across the organization.

In addition to safety, GAMA Enerji addresses employee health through a holistic approach. Periodic health surveillance and fitness-for-work examinations are conducted in accordance with legal requirements, supporting the early detection and prevention of occupational risks to which employees may be exposed. In addition to protecting physical health, the management of psychosocial risk factors and the promotion of employee well-being are considered integral components of the Company's OHS management approach.

GAMA Enerji regards employee participation as a fundamental governance principle in the areas of occupational health and safety, environmental management, and energy efficiency. Employee views and contributions are incorporated into the planning, implementation, performance evaluation, and continuous improvement of management systems. Various consultation and participation mechanisms are operated for this purpose, and regular information meetings are conducted by the Management Representative. Employee

input is obtained in processes including hazard identification, risk assessment, management of change, corrective action planning, and the identification of training needs and competencies, thereby supporting the continuous improvement of the management system.

Accident, incident, and near-miss reports are handled through a non-blaming approach focused on learning and prevention. Each report is subject to root cause analysis, and corrective actions are defined to prevent similar incidents from recurring. Potential emergency situations are recorded through designated corporate reporting channels and communicated to the relevant units within the prescribed timeframe. To enhance the effectiveness of occupational health and safety processes, the relevant processes and data were digitized in 2024, enabling accident and incident reporting to be conducted online through the Electronic Document and Management System.

The occupational health and safety approach extends across GAMA Enerji's entire value chain. As part of procurement processes, all suppliers whose activities have an impact on quality, environmental performance, OHS, or energy efficiency are evaluated by the relevant department using the Supplier Final Evaluation Form, and the results are recorded. Suppliers scoring below 70 points are issued a warning and removed from the Approved Supplier List. The evaluation forms are reviewed and updated annually to support the continuous improvement of OHS practices among suppliers. All suppliers included on the Approved Supplier List are subject to the requirements of the Quality, Environmental, OHS and Energy Efficiency Policy. In addition, OHS information and awareness activities are conducted for suppliers as part of power plant and Company orientation processes.

Stakeholder Engagement Management

Across all regions where it operates, GAMA Enerji maintains continuous, trust-based engagement with its stakeholders. Stakeholder engagement is considered important for strengthening corporate reputation, creating shared value, and contributing to economic development, with a focus on ensuring the effective management of related processes. Accordingly, communication activities are conducted based on the principles of transparency and accountability. GAMA Enerji’s stakeholder groups include external stakeholders such as public institutions, non-governmental organizations, and universities, as well as internal stakeholders such as managers and employees.

GAMA Enerji considers dialogue with stakeholders an important element in effectively managing the social, environmental, and economic impact of its activities. In this context, stakeholder views, expectations, and feedback are regularly analyzed

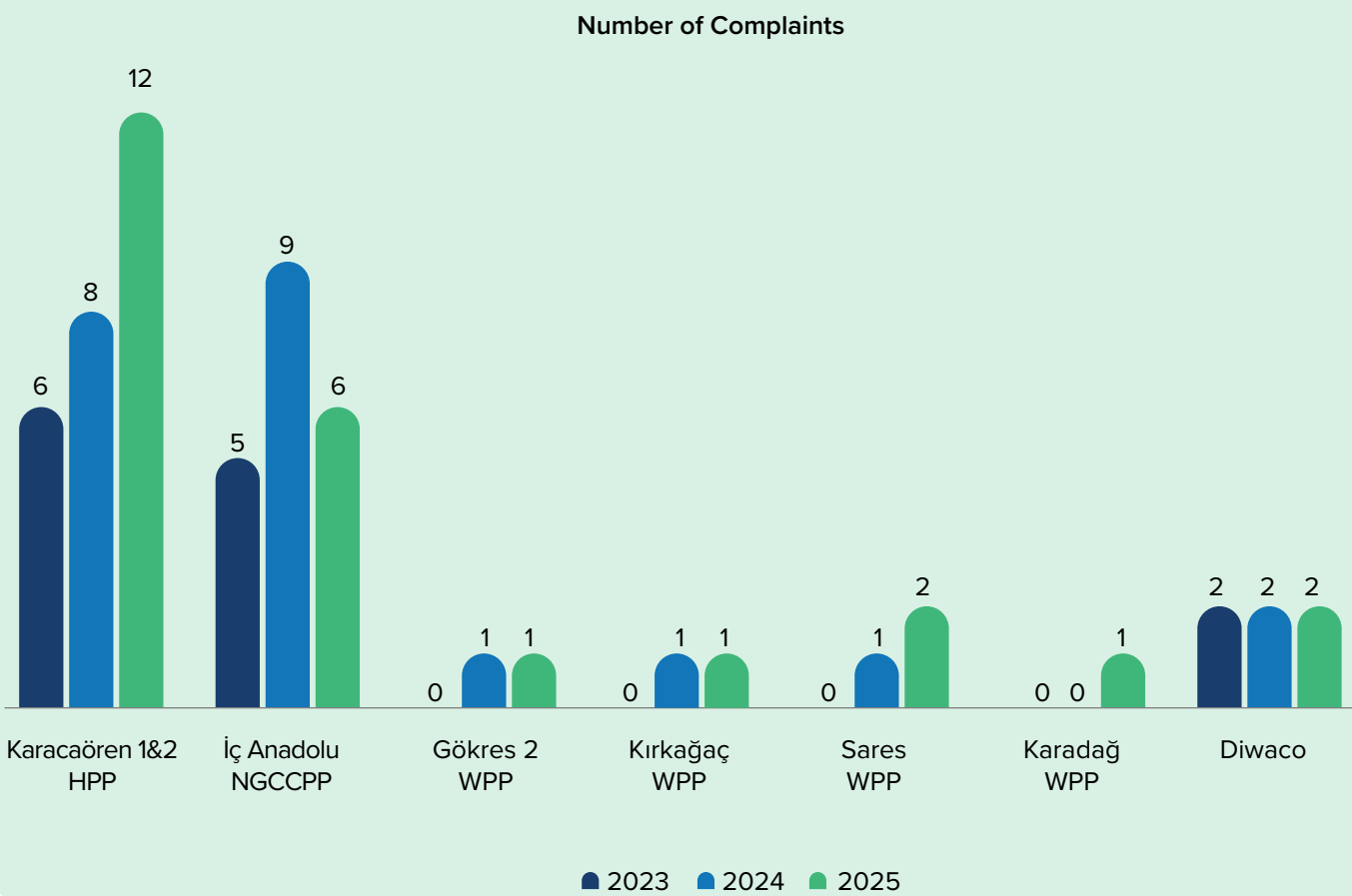
and used to improve business processes, support decision-making, and contribute to continuous improvement. The number of complaints received and fully resolved within this scope is presented below.

Number of Customer Complaints			
	2023	2024	2025
Number of complaints submitted to the Customer Communication Centre	14	11	16
Number of complaints responded to by the Customer Communication Centre	14	11	16
Number of complaints resolved by the Customer Communication Centre	14	11	16

In 2025, feedback and complaints received from internal and external stakeholders varied across sites. While the volume of feedback increased at certain locations, other facilities recorded lower levels compared with previous periods. Periodic variations were observed in the distribution of complaints among the facilities, with a limited number of new feedback submissions recorded at certain sites.

GAMA Enerji’s Complaint Mechanism Procedure aims to ensure that complaints, requests, and suggestions submitted by internal and external stakeholders are managed through an effective, fair, transparent, and accessible system. Notifications are received through various channels, including email, telephone, postal mail, and face-to-face communication, and are recorded and forwarded to the relevant departments. Throughout the assessment process,

complainants are regularly informed of the status of their submissions, and feedback on the outcome is provided once the review has been completed. The confidentiality of submissions is maintained throughout the process, and measures are in place to ensure that complainants are not subject to any form of retaliation. A defined process is in place to ensure that complaints are prioritized according to their urgency, assessed within specified timeframes, and resolved effectively. Dedicated communication channels have also been established for employees and contractors working at operational sites. The grievance management process is implemented in accordance with ethical principles and applicable legislation, while the effectiveness of the mechanism is regularly monitored and updated in line with identified needs.



Stakeholder Communication Table

External Communication

 Customers	 Public Authorities	 Contractors / Suppliers	 Communities in Affected Areas
Key Expectations - Reliable service - Uninterrupted energy supply - Prompt resolution - Transparent communication - Regulatory compliance	Key Expectations - Full regulatory compliance - Accurate and timely reporting - Transparent cooperation	Key Expectations - Fair business relationships - Open communication - Safe working environment - Sustainable business partnerships	Key Expectations - Transparent communication - Effective management of environmental impacts - Safe operations - Contribution to local development
Key Communication Topics - Contracts - Billing - Customer requests and complaints - Regulatory changes - Energy supply processes	Key Communication Topics - Permits and licenses - Legal notifications - Environmental and operational reporting - Inspections	Key Communication Topics - Contract processes - occupational health and safety practices - environmental requirements - Performance evaluations - Training	Key Communication Topics - Environmental impacts - Emergencies - Occupational accidents and near-miss incidents - Social responsibility initiatives - Complaints and suggestions
Communication Channels - Telephone - Email - Official correspondence - Meetings - Customer visits	Communication Channels - Official correspondence - Electronic applications - Meetings - Inspections	Communication Channels - Contracts - Meetings - Email - Training sessions - Site visits	Communication Channels - Public information meetings - Meetings with local village heads and local authorities - Telephone - Email - Face-to-face meetings
Material Topics - Customer Satisfaction - Business Ethics - Service Quality - Data Security	Material Topics - Regulatory Compliance - Climate Change - Energy Efficiency - Environmental Management	Material Topics - Occupational Health and Safety - Business Ethics - Human Rights - Supply Chain Sustainability	Material Topics - Environmental Impacts - Occupational Health and Safety - Emergency Management - Community Contribution - Biodiversity
Communication Frequency 	Communication Frequency 	Communication Frequency 	Communication Frequency 

Internal Communication

Employees

Key Expectations

- Safe and healthy working environment
- Fair and transparent management
- Career and development opportunities
- Effective communication
- Employee satisfaction

Key Communication Topics

- Occupational health and safety
- Training and development
- Performance management
- Working conditions
- Internal announcements
- Employee feedback and suggestions

Communication Channels

- Email
- Internal communication platforms
- Training sessions
- Meetings
- Performance reviews
- Employee surveys
- Grievance mechanism

Material Topics

- Occupational Health and Safety
- Employee Engagement and Development
- Human Rights,Diversity and Inclusion
- Corporate Culture

Communication Frequency

Shareholders

Key Expectations

- Sustainable growth
- Financial performance
- Effective risk management
- Transparency and accountability

Key Communication Topics

- Financial results
- Strategic objectives
- Investment plans
- Sustainability performance
- Corporate governance practices

Communication Channels

- General meetings
- Board reports
- Annual report
- Sustainability report
- Investor communications

Material Topics

- Corporate Governance
- Financial Performance
- Risk Management
- Sustainable Growth

Communication Frequency

Power Plants

Key Expectations

- Operational efficiency
- Safe working conditions
- Effective coordination
- Environmental performance

Key Communication Topics

- Production performance
- Maintenance activities
- Environmental practices
- OHS activities
- Emergency management

Communication Channels

- Operations meetings
- Digital management systems
- Email
- Site visits

Material Topics

- Operational Efficiency
- Occupational Health and Safety
- Energy Efficiency
- Environmental Performance

Communication Frequency



Daily

Weekly

Monthly

Annual

Periodic

As Needed

Regularly

Continuous

In accordance with regulatory requirements

Responsible Supply Chain Management

The supply chain plays an important role in integrating sustainability objectives into operational processes. Accordingly, the aim is to promote an understanding of environmental and social responsibility not only across the Company's operations but also among all collaborating stakeholders, thereby creating long-term value.

Procurement processes are carried out in line with sustainability principles, with a focus on developing long-term partnerships with suppliers and increasing the use of local suppliers. Environmental and social performance criteria are taken into consideration during supplier assessments, with issues such as energy and water consumption, waste management, and occupational health and safety practices being monitored. Areas for improvement are identified based on the results of these assessments, and the implementation of necessary improvement initiatives is supported.

A zero-tolerance approach is adopted towards child labor, forced labor, and discrimination in supplier relationships. Business partners are expected to operate in compliance with national legislation and international standards. In addition, effective management of physical, chemical, biological, and radiological risks that may arise depending on the nature of the sectors in which suppliers operate, as well as the provision of safe working environments, are considered important requirements.

Monitoring and corrective actions aimed at preventing high-risk practices are among the key obligations expected of suppliers. Supplier

performance is regularly assessed against defined sustainability criteria, and where non-compliance is identified, necessary improvement and restructuring processes are implemented. Cooperation is not continued with suppliers receiving a score below 70 as a result of the assessment.

No violations were identified in the supplier assessments conducted by GAMA Enerji in 2025.

“
The aim is to promote an understanding of environmental and social responsibility not only across the Company's operations but also among all collaborating stakeholders, thereby creating long-term value.
”

Customer Satisfaction Approach

GAMA Enerji provides reliable electricity supply to small, medium, and large-scale enterprises. Accordingly, an effective customer service system is maintained, and requests, suggestions, and complaints received from customers are addressed promptly and with a solution-oriented approach, taking into consideration the timeframes stipulated by applicable legislation.

“Customer satisfaction is among the Company’s priority areas, and continuous improvement of service processes is emphasized in line with the objective of being a reliable and preferred business partner.”

Customer satisfaction is among the Company’s priority areas, and continuous improvement of service processes is emphasized in line with the objective of being a reliable and preferred business partner. Customer feedback is regularly analyzed, and the findings are integrated into process improvement initiatives to enhance service quality.

Customer relationship management is conducted with a strong emphasis on data security and the protection of personal data. Transparency and trust are the fundamental principles governing communication with customers, while digital transformation initiatives are developed in alignment with sustainability objectives. Through this approach, GAMA Enerji maintains long-term, trust-based relationships with its customers and supports its sustainable growth objectives.



Corporate Social Responsibility and Community Investments

Collaborations and projects aimed at creating sustainable value in the areas of education, entrepreneurship, and social responsibility continue to be developed and implemented by GAMA Enerji in support of community development.

A sensitive approach is adopted in response to national developments in which social solidarity gains importance. Support is provided to the relevant processes, and various initiatives are carried out in order to respond to emerging needs in a timely manner. Employees are encouraged to participate voluntarily in social investment projects and corporate social responsibility activities, thereby contributing to community development while promoting a culture of volunteering.

At GAMA Enerji, engagement with leading higher education institutions in Ankara and Istanbul is maintained to support access to qualified human resources and foster long-term relationships with universities. In this context, participation is provided in career fairs organized by Middle East Technical University (METU), Bilkent University, University of Economics and Technology of the Education and Culture Foundation of the Chambers and Commodity Exchanges of Türkiye (TOBB ETU), Hacettepe University, TED University, Istanbul Technical University (ITU), Yıldız Technical University (YTU), and Koç University. In addition, invitations to participate as speakers at relevant universities are accepted.



As part of its corporate communication activities, GAMA Enerji continues to support student societies, university projects, and sectoral initiatives. Accordingly, Gold Sponsorship support for the ITU Zorlu Energy Solutions (ZES) Solar Car Team was continued in 2025. In addition, sponsorship support was provided for events organized by the METU Electrical and Electronics Engineers Institute Student Society and the Hacettepe University Economics Society.

GAMA Enerji strengthened its corporate commitments in this area by becoming a member of the 30% Club in 2025, which supports gender equality and increased representation of women in decision-making mechanisms.

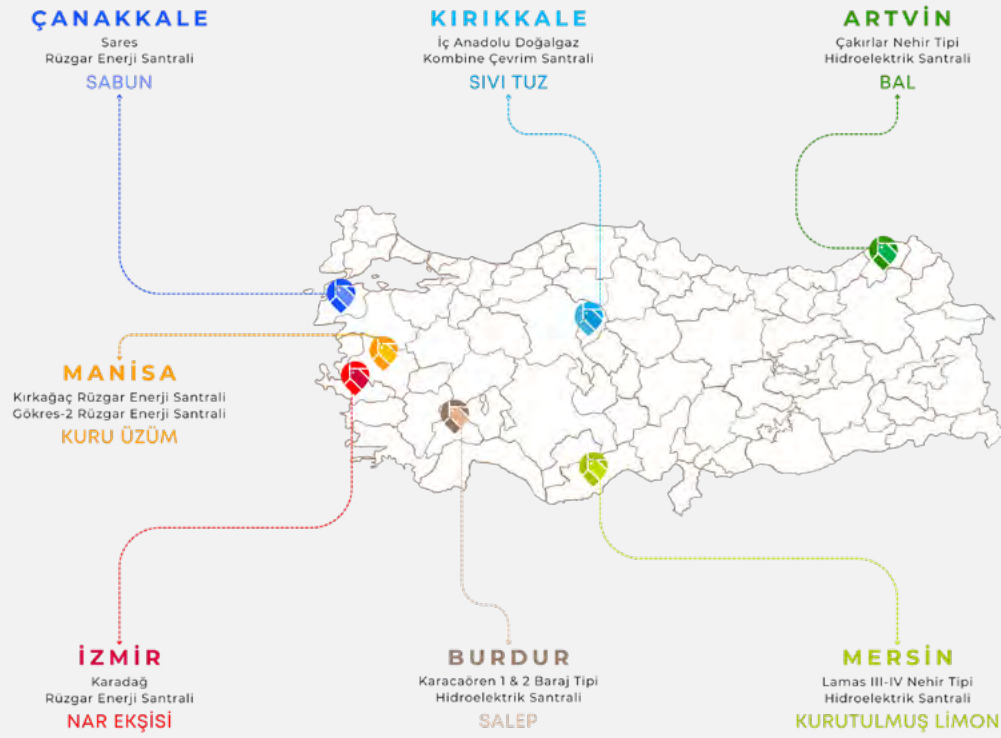


Artı Değer (Surplus Value) Scholarship Program

The Surplus Value Scholarship Program was launched in 2022 as part of GAMA Enerji's 20th anniversary, with the initial objective of supporting 20 students. As of 2025, the program had reached a total of 82 scholarship recipients since its inception, expanding its scope. In addition to providing financial support to students, the scholarship program aims to contribute to their personal and professional development through initiatives that support their career development.

Artı Değer (Surplus Value) Mentorship Program

University students participating in the Surplus Value Scholarship Program are provided with guidance throughout their educational and career journeys, supporting their development from multiple perspectives. Under the program, a total of 25 mentee-mentor pairings were established, and 93 meetings were held, contributing to students' questions and interests regarding their academic and professional lives.



Local Products Project

The Local Products Project was launched in 2024 to contribute to the economic empowerment of local producers and support regional development. The project aims to bring locally produced goods from producers operating in the regions of GAMA Enerji's seven power plants to broader stakeholder groups, thereby contributing to the support of local economies. In 2025, the GAMA Enerji Local Products Box was prepared with natural soap from Çanakkale, pomegranate molasses from İzmir, raisins from Manisa, liquid salt from Kırıkkale, honey from Artvin, dried lemons from Mersin, and salep from Burdur.

The project goes beyond promoting the visibility and use of local products and also contributes to the promotion of sustainable production practices and the support of fair-trade principles. In this context, a digital platform was established to increase the

visibility of producers and their products, providing an accessible structure through which users can learn about local producers and communicate with them directly. As a result of these efforts and collaborations, the Local Products Project received a Bronze Award in the "Best Team Supporting Responsible Production" category within the Social Responsibility and Sustainability section of the "The Hammers" Marketing Awards in 2025.

The effectiveness and impact of the project are regularly monitored, and improvement initiatives are carried out based on feedback and suggestions received from producers. While the social and economic impacts of the established partnerships are evaluated, activities aimed at supporting local producers and promoting sustainable production practices are intended to continue.



16 Days of Activism Against Gender-Based Violence Campaign

GAMA Enerji continues to contribute to initiatives aimed at promoting gender equality and raising awareness against all forms of violence. In this context, communication and awareness-raising activities focusing on digital violence were carried out as part of the 16 Days of Activism Against Gender-Based Violence Campaign in 2025.

Through these activities, the Company aimed to raise awareness of forms of violence and harassment encountered in digital environments, highlight the importance of safe digital spaces, and strengthen awareness in the fight against gender-based violence. The content developed as part of the campaign contributed to increasing stakeholders' knowledge and awareness of these issues.



GAMA Enerji Sihirli Harita: The Children's Book Project

A children's book entitled Sihirli Harita (Magic Map) was developed using the internal resources of the Corporate Communications Department with the aim of explaining energy generation and environmental awareness to children in an accessible manner. The content and visual design of the book were developed internally, and the book was published in both Turkish and English.

The book, which was distributed to employees' children, presents power plant locations and energy generation processes in an age-appropriate format. It also addresses the importance of energy generation, the protection of natural resources, and sustainability, with the aim of raising environmental awareness among children.

Aydınlanma Kitaplığı (Book Donation Project)

As part of the Aydınlanma Kitaplığı (Book Donation Project), implemented in cooperation with Ankara CUMOK (Republic Readers), a total of 1,356 books were donated to six different regions with the voluntary contributions of employees.

The project aims to improve children's and young people's access to books, encourage reading habits, and contribute to the development of educational opportunities. Book donation activities continue under the project, which brings employee volunteering together with social benefit.

Digitalization and Information Security





GAMA Enerji’s initiatives in digitalization and information security aim to increase operational efficiency while strengthening a data-driven decision-making culture, enhancing organizational resilience, and supporting sustainability objectives through digital technologies. The digital transformation approach is addressed within a holistic framework encompassing process automation, data analytics, artificial intelligence, cybersecurity, and integrated governance practices.

“

In 2025, GAMA Enerji strengthened its operational resilience through initiatives in digitalization, data management, and cybersecurity, significantly enhancing its digital infrastructure to support data-driven decision-making, process automation, and sustainability management.

”

In 2025, digitalization initiatives were carried out in line with the “Digital and Sustainability-Oriented Organizational Resilience” objective defined in the Company’s strategy. In this context, corporate data management, end-to-end process automation, development of the digital infrastructure supporting the net-zero transformation, integrated risk oversight, and strengthening sustainability performance management were identified as priority areas of focus.

In 2025, initiatives were launched to digitalize the security infrastructure across our portfolio. As an initial step, the number of security personnel deployed at our hydroelectric power plants, totaling 32 employees, is planned to be reduced to 10 through the implementation of digital security cameras and remote monitoring systems. This transformation aims to enable more effective utilization of human resources, continuous remote monitoring of security operations, enhanced security levels, and optimization of operational costs.

The transformation aimed at expanding the digital security infrastructure across our hydroelectric power plants is planned to be completed in the first half of 2026. In the second phase, the digital security infrastructure is planned to be extended to all power plants across our portfolio. This transformation aims to increase centralized and remote monitoring capabilities, enable more effective and sustainable management of security processes, enhance security levels, and achieve operational cost savings.

Digitalization and R&D

Digitalization and innovation are among the key components of GAMA Enerji's operational excellence approach. Digitalization projects led by the IT Directorate aim to simplify business processes, improve data quality, reduce manual operations, and increase the digital maturity level of business processes across the organization. Digital transformation projects identified annually are evaluated in line with strategic priorities and implemented with the approval of senior management.

In 2025, 42 digital transformation projects were launched across the company in line with digitalization objectives. By year-end, 18 of these projects had been completed, 4 had reached the completion stage, 15 were ongoing in the development phase, and 5 projects had been discontinued as part of the prioritization process. Completed projects covered digital improvements across energy trading, finance, human resources, operations, procurement, legal, sustainability, quality, environmental, and occupational health and safety processes.

During the year, digital projects were also carried out to support the separation process of the İç

Anadolu NGCCPP. The separation of modules related to İç Anadolu NGCCPP within the GAMA Intelligence platform, the enVision Document Management System, all SAP modules in use, the Data Warehouse project, and RPA (robotic process automation) processes was initiated and carried out.

Two projects developed under the DMWL program were successfully completed. These included the integration of reconciliation services of Energy Markets Operation Inc. (EPIAS), as well as critical enhancements to the GAMA Intelligence platform, including role and authorization management, workforce data integration, development of a modular architecture, and migration to a new server infrastructure.



Data Warehouse Project

In 2025, one of the most significant components of digital transformation was the Enterprise Data Warehouse Project. The project aimed to establish a single and reliable source of data across the organization, while continuing to develop business intelligence and analytical reporting infrastructure to enable comprehensive monitoring of financial and operational performance.

By year-end, 41 projects had been carried out as part of the Data Warehouse activities. Of these, 15 had been completed, 9 had reached an advanced stage, and 17 remained under development. In this context, production, performance, commercial activity, and reconciliation reports for İç Anadolu NGCCPP, as well as finance and human resources reports, were completed. In addition, approximately 450 data integration points were developed for the EPIAS TPYS system, enabling operational data to be automatically collected and reported from different systems.

Alongside the strengthening of the corporate data infrastructure, significant progress was made in establishing the data model and analytical infrastructure required for future artificial intelligence and machine learning applications. In addition, infrastructure development continued to enable sustainability indicators and the Soft KPI structure to be monitored digitally, resulting in significant progress toward integrating sustainability performance into management reporting.



Artificial Intelligence and Digital Competencies

GAMA Enerji continues to prepare for the implementation of artificial intelligence and machine learning applications to support a data-driven decision-making culture. Throughout 2025, the data layers required to form the foundation for future artificial intelligence applications were established through the development of the data warehouse and analytical infrastructure.

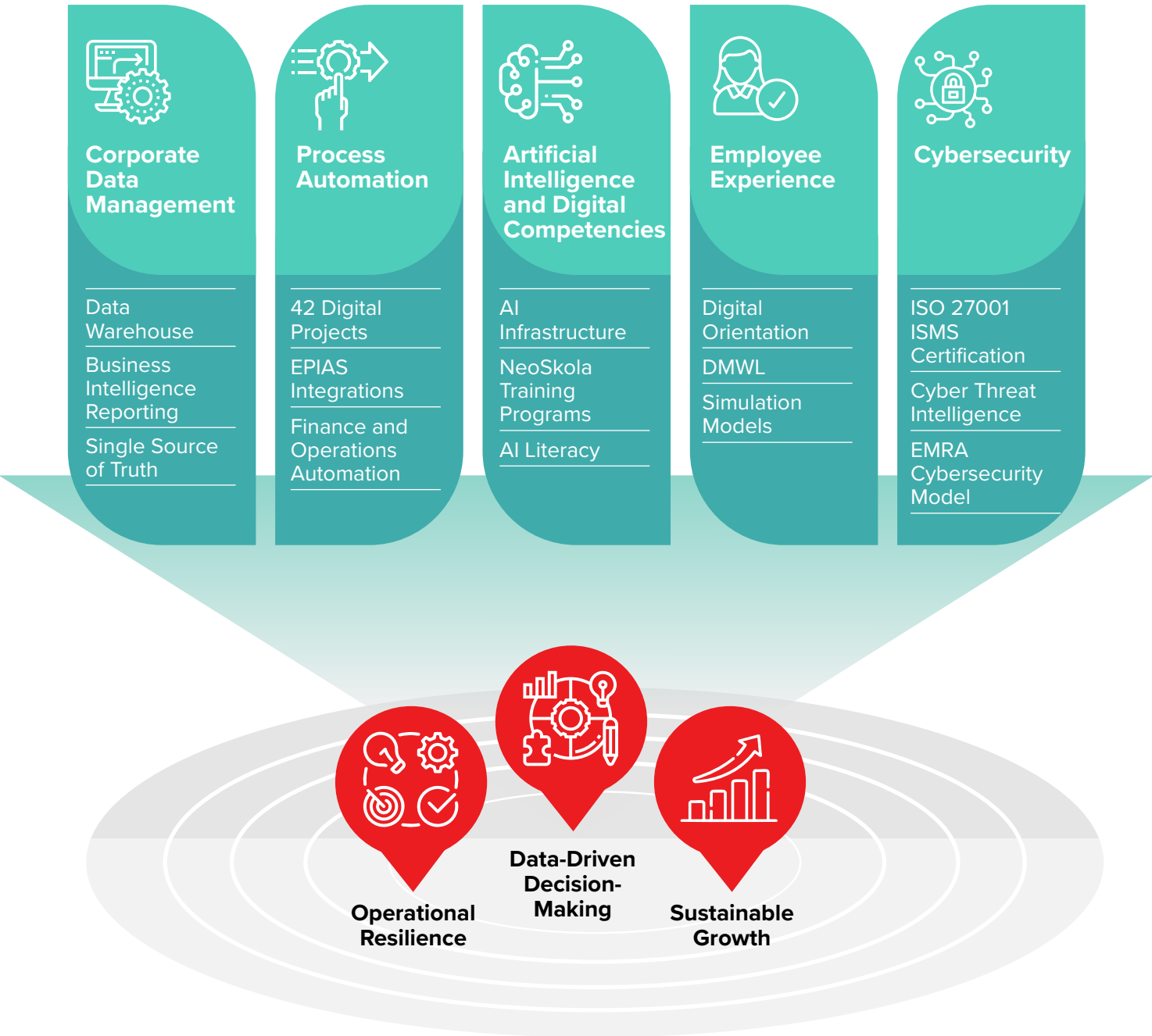
At the same time, training activities were carried out to strengthen digital competencies across the organization. Digitalization training sessions were provided for the DMWL Digitalization Group, and the "Artificial Intelligence in the Corporate World" training was assigned to all employees through the NeoSkola platform, with the aim of increasing AI literacy.

Digital Employee Experience

In 2025, the onboarding process was digitized under the DMWL program to enhance employee experience. The digital onboarding application provided new employees with a more accessible, interactive, and user-friendly learning experience, while simulation modules and enriched content supported the adaptation process. This initiative aimed to improve the employee experience and facilitate the more effective transfer of corporate knowledge.

The digitalization and R&D activities carried out in 2025 were implemented as part of a comprehensive transformation program covering data management, process automation, artificial intelligence infrastructure, digital employee experience, cybersecurity, and sustainability-focused applications. The key areas constituting GAMA Enerji’s digital transformation approach in 2025 are summarized in the figure below.

GAMA Enerji 2025 Digital Transformation and R&D Roadmap



Information Security

Information security is an integral part of GAMA Enerji’s digital transformation strategy. The Company considers protecting its information assets, ensuring operational continuity, and strengthening organizational resilience against evolving cyber threats among its key priorities.

Information security management is carried out in accordance with the ISO 27001 Information Security Management System (ISMS) standard, with the coordination of information security processes overseen by the Information Security Committee. Policies and procedures are regularly reviewed, while training activities aimed at increasing information security awareness among employees and relevant stakeholders are continuously maintained.

In 2025, the independent ISO 27001 audit was successfully completed, confirming the compliance of the Information Security Management System with international standards. As part of this process, information security controls were reviewed, improvement actions were planned, and a continuous improvement approach was maintained.

In the area of cybersecurity, assessments of the İç Anadolu NGCCPP and Kremna facilities under the EMRA Cybersecurity Competency Model were completed. Across GAMA Enerji, the Cyber Threat Intelligence Service was deployed and became operational as of September 2025. This enabled proactive monitoring of evolving cyber threats, strengthened early warning mechanisms, and enhanced organizational cyber resilience.

To support an information security culture across the organization, regular awareness training, technical security testing, system updates, and activities for monitoring security vulnerabilities continued throughout the year. Efforts to protect digital assets and ensure business continuity were maintained throughout 2025.



Annexes

Performance Indicators

Financial Performance Indicators

KEY FINANCE INDICATORS			
Million USD*	2023	2024	2025
Revenues	840.20	470.95	586.17
EBITDA	139.70	91.87	97.81
EBITDA Margin (%)	17%	20%	16.70%
Total Assets	1,570.73	1,251.44	1,133.55

*The consolidated financial statements of GAMA Enerji have been prepared in accordance with International Financial Reporting Standards.

2025 FINANCIAL PERFORMANCE BY ACTIVITY			
Distribution of 2025 EBITDA by Operations (million USD)	Diwaco Water Transmission Facility	Electricity Generation / Supply	Total
Revenues	134.45	451.72	586.17
EBITDA*	63.90	33.91	97.81
EBITDA Margin (%)	47.50%	7.50%	16.70%

*The impairment related to the sale value of the İç Anadolu NGCCPP is considered a one-off impact, and the amount presented represents EBITDA adjusted to exclude this impact.

DISTRIBUTION OF REVENUES BY COMPANIES (%)			
	2023	2024	2025
İÇ ANADOLU NGCCPP	69.8%	53.8%	61.0%
Diwaco	16.4%	29.8%	22.9%
OTHER*	7.8%	7.2%	9.4%
GARET	4.3%	6.5%	5.5%
KREMNA	1.7%	2.7%	1.2%
TOTAL	100%	100%	100%

*The revenue amounts for 2023 and 2024 have been restated using the current measurement unit as of the end of 2025 to ensure comparability of financial information. In the company-level revenue breakdown, GATES and GEAŞ İşletme ve Bakım A.Ş. companies are presented under “Other.”

Environmental Performance Indicators

GREENHOUSE GAS EMISSIONS				
Metric	Unit	2023	2024	2025
Scope 1	tCO ₂ e	1,399,402.69	979,775.14	1,443,638.46
Scope 2	tCO ₂ e	129,422.92	142,340.47	137,638.82
Scope 3	tCO ₂ e	270,574.17	256,025.33	346,290.63
Total	tCO ₂ e	1,799,399.80	1,378,140.9	1,927,567.9
Category 1	tCO ₂ e	1,399,402.69	979,775.14	1,443,638.46
Category 2	tCO ₂ e	129,422.92	142,340.47	137,638.82
Category 3	tCO ₂ e	5,042.09	23,046.41	13,341.82
Category 4	tCO ₂ e	234,905.63	168,729.49	246,964.18
Category 5	tCO ₂ e	30,626.45	64,249.42	85,984.63
Total	tCO ₂ e	1,799,399.78	1,378,140.94	1,927,567.91

ENERGY CONSUMPTION				
Location	Unit	2023	2024	2025
Electricity Consumption – Mains Network	GJ	1,161,474.55	1,215,197.95	1,240,193.10
Electricity Consumption – From Renewable Sources	GJ	2,651.04	1,988.74	6,073.32
İç Anadolu NGCCPP Natural Gas Consumption	GJ	24,684,511.30	17,302,992.45	25,573,483.26
Natural Gas Consumption for Heating	GJ	714.95	513.42	631.24
Generator/Fire Pump Consumption – Diesel/Gasoline	GJ	5,094.78	1,910.27	1,568.22
Vehicular Consumption - Diesel Fuel	GJ	7,550.55	7,039.32	5,855.81
Vehicular Consumption - Gasoline	GJ	1,778.08	2,574.57	5,209.09
Total Energy Consumption	GJ	25,863,775.26	18,532,216.73	26,833,014.05

ENERGY CONSUMPTION				
Location	Unit	2023	2024	2025
Ankara Office	GJ	1,436.38	1,204.91	984.05
Çakırlar HPP	GJ	1,166,957.48	1,217,794.86	1,246,613.46
Diwaco	GJ	1,395.20	1,345.98	1,248.92
Gökres-2 WPP	GJ	1,264.72	1,270.26	1,371.61
İçanadolu NGCCPP	GJ	24,685,528.62	17,304,013.83	25,575,853.42
İstanbul Office	GJ	253.36	501.25	238.35
Karacaören 1 HPP	GJ	1,918.21	1,876.10	1,738.78
Karacaören 2 HPP	GJ	889.13	800.69	1,469.32
Karadağ WPP	GJ	400.22	349.27	691.18
Kırkağaç WPP	GJ	1,135.26	1,013.11	1,016.56
Lamas III-IV HPP	GJ	1,691.36	1,139.26	884.85
Sares WPP	GJ	905.32	907.21	903.57
Total Energy Consumption	GJ	25,863,775.26	18,532,216.73	26,833,014.05

2025 WATER WITHDRAWAL BY SOURCE						
Location	Unit	Surface Water	Groundwater	Municipal Water Supply	Drinking Water	Total
İç Anadolu NGCCPP	m³	314,307.00	0	0	50.40	314,357.40
DISI	m³	0	117,000,528.00	72.00	61.39	117,000,661.39
Çakırlar HPP	m³	44,227,296.00	0	365.00	0	44,227,661.00
Lamas III-IV HPP	m³	325.00	0	433.00	0	758.00
Karacaören-1 HPP	m³	243,038,243.00	0	612.40	2.13	243,038,857.53
Karacaören-2 HPP	m³	238,677,743.00	0	172.00	0	238,677,915.00
Karadağ WPP	m³	0	0	100.00	4.46	104.46
Gökres-2 WPP	m³	0	0	237.00	6.73	243.73
Kırkağaç WPP	m³	0	0	153.00	5.61	158.61
Sares WPP	m³	0	0	72.00	7.31	79.31
İstanbul Office	m³	0	0	188.00	0	188.00
Ankara Head Office	m³	0	0	2,314.20	15.46	2,329.66
Total	m³	526,257,914.00	117,000,528.00	4,718.60	153.49	643,263,314.09

2025 BLUE WATER FOOTPRINT					
Location	Unit	Volume of Evaporated Water	Volume of Water Entering the System/ Product	Volume of Water Not Returned to the System	Total
İç Anadolu NGCCPP	m³	42,676.00	12,187.00	183,411.69	238,274.69
DISI	m³	128,700.58	0	116,871,892.22	117,000,592.80
Çakırlar HPP	m³	0	0	328.50	328.50
Lamas III-IV HPP	m³	0	0	389.70	389.70
Karacaören-1 HPP	m³	9,914,237.44	0	551.16	9,914,788.60
Karacaören-2 HPP	m³	2,455,822.92	0	154.80	2,455,977.72
Karadağ WPP	m³	0	0	90.00	90.00
Gökres-2 WPP	m³	0	0	213.30	213.30
Kırkağaç WPP	m³	0	0	137.70	137.70
Sares WPP	m³	0	0	64.80	64.80
Total	m³	12,541,436.94	12,187.00	117,057,233.87	129,610,857.80

WASTE DATA				
Metric	Unit	2023	2024	2025
Hazardous Waste Quantity	Tonne	114.47	64.41	91.71
Non-Hazardous Waste Quantity	Tonne	12.13	34.36	7.35
Total	Tonne	126.60	98.77	99.06

Social Performance Indicators

WORKFORCE										
Topic		İstanbul and Ankara Offices			Domestic Assets			Overseas Assets		
		2023	2024	2025	2023	2024	2025	2023	2024	2025
Total Workforce		96	89	82	237	234	221	70	69	253
Direct Employment		95	88	81	113	119	116	12	12	70
Women	Blue Collar	2	1	1	1	1	0	0	0	0
	White Collar	44	39	40	2	2	3	5	5	5
Men	Blue Collar	9	9	9	86	89	87	24	25	26
	White Collar	40	39	31	24	27	26	41	39	39
Subcontractors' Employees		1	1	1	124	115	105	58	57	183
Women	Blue Collar	0	0	0	2	3	4	0	0	0
	White Collar	0	0	0	0	0	0	4	4	0
Men	Blue Collar	0	0	0	120	110	101	24	25	183
	White Collar	1	1	1	2	2	0	30	28	0
Total Workforce by Contract Type		95	88	81	113	119	116	12	12	70
Indefinite-Term		94	88	80	113	119	116	12	12	69
Women		48	40	40	3	3	3	1	1	5
Men		46	48	40	110	116	113	11	11	64
Temporary		1	0	1	0	0	0	0	0	1
Women		1	0	1	0	0	0	0	0	0
Men		0	0	0	0	0	0	0	0	1
Total Workforce by Education Level		95	88	81	112	119	116	12	12	70
No formal education		0	0	0	0	0	0	1	1	1
Primary Education		0	0	0	16	16	12	2	2	7
High School		11	9	11	39	43	45	1	1	5
University degree or higher		84	79	70	57	60	59	8	8	57
Total Workforce by Age Groups		95	88	81	113	119	116	12	12	70
Women		46	40	41	3	3	3	1	1	5
18-30		16	12	7	0	0	0	0	0	0
30-45		24	22	26	3	3	3	1	1	3
45+		6	6	8	0	0	0	0	0	2
Men		49	48	40	110	116	113	11	11	65
18-30		11	16	7	6	7	10	0	0	0
30-45		28	24	25	49	54	38	6	7	38
45+		10	8	8	55	55	65	5	4	27
Composition of Senior Management		5	5	5	0	0	0	2	2	3
Women		0	0	1	0	0	0	0	0	0
18-30		0	0	0	0	0	0	0	0	0
30-45		0	0	1	0	0	0	0	0	0
45+		0	0	0	0	0	0	0	0	0
Men		5	5	4	0	0	0	0	0	3
18-30		0	0	0	0	0	0	0	0	0
30-45		2	2	2	0	0	0	1	1	1
45+		3	3	2	0	0	0	1	1	2

GRI- 2-7, 2-8, 3-3, 403-2, 403-3, 403-5, 403-9, 401-1, 401-3, 404-1, 404-2, 414-1,414-2, 405-1, 405-2

WORKFORCE									
Topic	İstanbul and Ankara Offices			Domestic Assets			Overseas Assets		
	2023	2024	2025	2023	2024	2025	2023	2024	2025
Number of Directors	5	6	5	0	0	0	0	0	0
Women	2	3	2	0	0	0	0	0	0
18-30	0	0	0	0	0	0	0	0	0
30-45	1	2	1	0	0	0	0	0	0
45+	1	1	1	0	0	0	0	0	0
Men	3	3	3	0	0	0	0	0	0
18-30	0	0	0	0	0	0	0	0	0
30-45	3	2	1	0	0	0	0	0	0
45+	0	1	2	0	0	0	0	0	0
Number of Managers	9	11	11	8	8	14	1	1	14
Women	4	5	6	0	0	0	0	0	1
18-30	0	0	0	0	0	0	0	0	0
30-45	3	4	4	0	0	0	0	0	1
45+	1	1	2	0	0	0	0	0	0
Men	5	6	5	8	8	14	1	1	13
18-30	0	0	0	0	0	0	0	0	0
30-45	4	5	5	1	2	3	1	1	8
45+	1	1	0	7	6	11	0	0	5
Number of Managing Employees	20	21	20	7	7	31	0	0	0
Women	13	15	15	0	0	0	0	0	0
18-30	1	2	1	0	0	0	0	0	0
30-45	9	9	9	0	0	0	0	0	0
45+	3	4	5	0	0	0	0	0	0
Men	7	6	5	7	7	31	0	0	0
18-30	0	0	0	0	0	0	0	0	0
30-45	4	4	4	3	2	11	0	0	0
45+	3	2	1	4	5	20	0	0	0
Number of Non-Managing Employees	55	46	40	98	105	71	9	9	53
Women	27	18	17	3	3	3	0	0	4
18-30	15	11	8	0	0	0	1	1	0
30-45	11	7	9	3	3	3	0	0	2
45+	1	0	0	0	0	0	0	0	2
Men	28	28	23	95	102	68	0	0	49
18-30	11	16	7	6	7	3	0	0	0
30-45	14	11	13	45	50	31	4	4	29
45+	3	1	3	44	45	34	4	4	20
Newly Recruited Employees	20	13	9	3	9	2	0	0	3
Women	10	5	5	0	0	0	0	0	0
Men	10	8	4	3	9	2	0	0	3
Number of Employees Who Left the Company	14	20	15	4	5	5	0	0	1
Women	5	11	4	1	0	0	0	0	0
Men	9	9	11	3	5	5	0	0	1

EMPLOYEE INDICATORS				
Topic	Unit	2023	2024	2025
Employee turnover	%	10.06	11.12	8.36
Ratio of voluntary leavers (who quit on own will for various reasons) to total number of employees	%	5.49	6.41	4.18
Ratio of involuntary leavers (retirement, death, incapacity to work, dismissal, end of contract, termination by employer) to total number of employees	%	4.57	3.84	4.18
Number of employees on maternity leave	Person	0	1	2
Ratio of employees returning to work following end of maternity leave	Person	0	1	2
Gender pay gap	%	10.06	6.31	9.40

TRAINING DATA								
Location	Indicator	2023		2024		2025		
		Environment	Personal and Technical Development	Environment	Personal and Technical Development	Personal Development	Technical Development	Environment
İstanbul & Ankara Offices	Total number of recipients	259	233	110	297	249	16	78
	Total hours	86	215	15	156	24	56	18
	Total person*hour	700	2,135	601	1,797	1,037	286	184
Assets	Total number of recipients	10	131	34	93	7	4	56
	Total hours	11	246	6	170	7	86	8
	Total person*hour	34	428	38	386	49	172	102
Overseas Assets (Diwaco)	Total number of recipients	5	15	73	123	4	3	86
	Total hours	3	4	32	56	80	57	27
	Total person*hour	15	30	314	440	320	171	262

GAMA ENERJİ OHS TRAINING PERFORMANCE			
Indicator / Metric	2023	2024	2025
Total Cumulative Participation (Person)	1,925	2,905	1,939
Total OHS Training Hours: Person*Hour	8,987	7,863	7,033

ACCIDENT / INCIDENT DATA			
Indicator	2023	2024	2025
Total Number of Accidents	0	1	7
Number of Fatal Accidents	0	0	0
Lost Time Injury - LTI	0	0	2
Total Number of Lost Workdays	0	0	17
Number of Near-Misses	49	24	18

ACCIDENT / INCIDENT PERFORMANCE RATES				
Indicator	Formula / Methodology	2023	2024	2025
Lost Time Injury Frequency Rate - LTIFR	$LTI \times 1,000,000 / \text{man-hours [GRI 403-9]}$	0	0	4
Lost Time Injury Severity Rate - LTISR	$\text{Lost Days} \times 1,000,000 / \text{man-hours [GRI 403-9]}$	0	0	34
Accident-Related Lost Workday Rate	$\text{Lost Days} \times 200,000 \text{ man-hours [IFC / OSHA]}$	0	0	6.88
Near Miss Frequency Rate - NMFR	$\text{Near-Misses} \times 1,000,000 / \text{man-hours}$	6.12	5.37	36.41

ANNUAL WORKING HOURS						
Location	2023		2024		2025	
	Employees	Subcontractors	Employees	Subcontractors	Employees	Subcontractors
İç Anadolu NGCCPP	204,380		196,551		196,551	
Karacaören 1&2 HPP	5,330	83,830	3,959	76,436	3,942	43,593
Lamas III-IV HPP	6,972	45,758	6,725	41,631	6,284	35,861
Çakırlar HPP	43,752	8,264	46,860	8,264	47,520	8,640
Sares WPP	12,820	14,456	12,360	17,320	13,820	16,560
Gökres-2 WPP	14,160	15,136	15,449	15,429	14,635	15,429
Karadağ WPP	4,956	8,438	4,698	14,276	5,280	14,400
Kırkağaç WPP	10,015	15,857	11,405	15,429	10,282	15,429
Diwaco Water Transmission Line	23,040	116,138	23,040	114,584	23,040	23,040

CUSTOMERS-COMPLAINTS			
Indicator	2023	2024	2025
Number of complaints communicated to the Customer	14	11	16
Number of complaints responded to by the Customer Communication	14	11	16
Number of complaints resolved by the Customer Communication	14	11	16

SUPPLY CHAIN						
Indicator	2023		2024		2025	
Total number of suppliers	Local	Foreign	Local	Foreign	Local	Foreign
	2,386	94	2,703	107	2,908	116
	2,480		2,810		3,024	
Ratio of local suppliers (%)	96.21%		96.19%		96.16%	
Number of suppliers assessed for environmental and social conformity	Local	Foreign	Local	Foreign	Local	Foreign
	734	31	824	39	887	41
	765		863		928	
Number of suppliers requested correction / improvement as a result of conformity assessment	Local	Foreign	Local	Foreign	Local	Foreign
	0	0	0	0	0	0
	0		0		0	
Number of suppliers terminated as a result of conformity assessment	Local	Foreign	Local	Foreign	Local	Foreign
	0	0	0	0	0	0
	0		0		0	

DONATIONS AND SPONSORSHIPS				
Entity/Project Receiving Donation	Unit	2023	2024	2025
Donations	USD	311,995.71	12,048.71	1,956.48
Scholarships	USD	20,294.77	37,203.94	64,361.67
Sponsorships	USD	27,827.53	76,722.78	61,210.91
Projects	USD	1,838.52	15,000.00	20,284.64
Total	USD	361,956.53	140,975.43	147,813.70

Definitions and Abbreviations

CBAM: Carbon Border Adjustment Mechanism; a mechanism requiring the embedded emissions of certain carbon-intensive products imported into the European Union to be subject to carbon pricing.

CDP: Carbon Disclosure Project; a global reporting platform through which companies disclose their performance on climate change, water security, and other environmental issues.

CITES: Convention on International Trade in Endangered Species of Wild Fauna and Flora; an international agreement aimed at ensuring that international trade in wild animals and plants does not threaten the survival of these species.

CO₂e: Carbon dioxide equivalent; a common unit used to express the global warming impact of different greenhouse gases in terms of carbon dioxide.

CUMOK: Republic Readers; a voluntary readers' organization that contributes to various social, cultural, and educational initiatives.

DEI: Diversity, Equity and Inclusion; an approach focused on recognizing differences, promoting equal opportunities, and developing inclusive working environments.

DIWACO: DISI Water Company; a subsidiary carrying out GAMA Enerji's water conveyance project in Jordan.

DMWL: Do More with Less; a GAMA Enerji working group focused on using resources more efficiently and creating greater value with fewer resources.

EBITDA: Earnings Before Interest, Taxes, Depreciation and Amortization; a financial performance indicator showing a company's operating profitability before financing, tax, and depreciation/amortization effects.

EBRD: European Bank for Reconstruction and Development; an international financial institution that supports the development of sustainable and market-oriented economies.

EDIDER: Digitalization Association in Energy.

EMRA: Energy Market Regulatory Authority.

EPA: Energy Producers Association.

EPIAS: Energy Exchange Istanbul; the market operator responsible for operating Türkiye's energy markets.

ESG: Environmental, Social and Governance; refers to the environmental, social, and corporate governance dimensions of a company's sustainability performance.

ESRS: European Sustainability Reporting Standards; sustainability reporting standards used within the European Union sustainability reporting framework.

ETA: Energy Traders Association.

ETS: Emissions Trading System; a market-based carbon pricing mechanism aimed at reducing greenhouse gas emissions within defined limits.

GARET: Garet Enerji Üretim ve Ticaret A.Ş.; a subsidiary of GAMA Enerji that holds part of the Company's renewable energy generation assets.

GATES: GATES Enerji Ticaret A.Ş.; a subsidiary of GAMA Enerji operating in the energy trading sector.

GEAŞ: GEAŞ İşletme ve Bakım A.Ş.; a subsidiary responsible for the operation and maintenance activities of electricity generation facility within GAMA Enerji's portfolio.

GIF: IFC GIF Holding I Coöperatief U.A.; an entity within GAMA Enerji's ownership structure.

GJ: Gigajoule; a unit of energy equivalent to one billion joules. It is used in the Report to express energy consumption.

GRI: Global Reporting Initiative; an international organization that develops sustainability reporting standards for reporting organizations' impacts on the economy, environment, and people.

GS: Gold Standard; an international carbon standard used to certify the climate and sustainable development contributions of greenhouse gas emission reduction projects.

GUYAD: Energy Investors Association.

HPP: Hydroelectric Power Plant; a facility that generates electricity by utilizing the potential and kinetic energy of water.

HVAC: Heating, Ventilation and Air Conditioning; systems used to manage indoor temperature, air quality, and climate conditions.

I-REC: International Renewable Energy Certificate; an energy attribute certificate that verifies that electricity has been generated from renewable energy sources.

IFC: International Finance Corporation; an international financial institution within the World Bank Group that supports private-sector investment.

IFRS: International Financial Reporting Standards; a set of international standards governing financial reporting.

ILO: International Labour Organization; a specialized United Nations agency responsible for developing international standards relating to the world of work.

ISO: International Organization for Standardization; an independent international organization that develops international standards across various fields.

ISO 14001: Environmental Management System Standard; an international standard specifying requirements for organizations to systematically manage their environmental impacts.

ISO 14064-1: An international standard specifying requirements and guidance for the quantification and reporting of greenhouse gas emissions and removals at the organizational level.

ISO 45001: Occupational Health and Safety Management System Standard; specifies requirements for the systematic management of occupational health and safety risks.

ISO 50001: Energy Management System Standard; specifies requirements for organizations to systematically improve their energy performance.

ISO 9001: Quality Management System Standard; an international standard that specifies requirements for organizations' quality management systems.

ISSB: International Sustainability Standards Board; a standard-setting body that develops global disclosure standards addressing investors' information needs regarding sustainability-related financial information.

ITU: Istanbul Technical University.

IUCN: International Union for Conservation of Nature; an international organization working to conserve nature and biodiversity.

KRI: Key Risk Indicators; measurable indicators used to monitor changes in risk levels and provide early warning signals.

LTI: Lost Time Injury; an injury resulting from a work-related incident that prevents an employee from performing their normal work activities for a specified period.

LTIFR: Lost Time Injury Frequency Rate; an occupational health and safety performance indicator measuring the frequency of lost-time injuries relative to hours worked.

LTISR: Lost Time Injury Severity Rate; an occupational health and safety performance indicator measuring lost days resulting from work-related injuries relative to hours worked.

M&A: Mergers and Acquisitions; corporate transactions involving the merger of companies or the acquisition of companies/assets.

m: Meter; a unit of length.

m²: Square meter; a unit of area.

m³: Cubic meter; a unit of volume.

m³/year: Cubic meters per year; a unit expressing the volume of water transported, used, or consumed over a one-year period.

METU: Middle East Technical University.

MW: Megawatt; a unit of power used to express the installed or instantaneous power capacity of electricity generation facilities.

MWe: Megawatt electric; a unit expressing the electrical power capacity of an electricity generation facility.

MWh: Megawatt-hour; a unit of energy representing the amount of electricity generated or consumed over a specified period.

MWp: Megawatt-peak; a unit used primarily for solar energy systems to express the maximum installed power capacity under standard test conditions.

NGCCPP: Natural Gas Combined Cycle Power Plant; a type of power plant that generates electricity through the combined operation of gas and steam turbines using natural gas.

NMFR: Near Miss Frequency Rate; an occupational health and safety performance indicator measuring the frequency of near-miss incidents relative to hours worked.

OHS: Occupational Health and Safety; refers to practices and management processes designed to protect employees from work-related health and safety risks.

PPE: Personal Protective Equipment; equipment used by employees to protect themselves against occupational health and safety risks.

SBTi: Science Based Targets initiative; an initiative that supports companies in setting greenhouse gas emission reduction targets aligned with climate science and global climate goals.

SCADA: Supervisory Control and Data Acquisition; a system that enables the real-time monitoring, collection, and control of operational data from facilities and equipment.

SDGs: Sustainable Development Goals; the 17 global goals established by the United Nations to support sustainable development by 2030.

SPP: Solar Power Plant; a production plant where solar energy is converted into electrical energy.

tCO₂e: Tonnes of carbon dioxide equivalent; a unit used to express the global warming impact of different greenhouse gases in tonnes of CO₂ equivalent.

TED University: Turkish Education Association University.

TL: Turkish Lira; the official currency of the Republic of Türkiye.

TOBB ETU: University of Economics and Technology of the Education and Culture Foundation of the Chambers and Commodity Exchanges of Türkiye

TSRS: Türkiye Sustainability Reporting Standards; reporting standards applied in Türkiye for the disclosure of sustainability-related financial information by businesses.

TUREB: Turkish Wind Energy Association.

TUSIAD: Turkish Industry and Business Association.

USD: United States Dollar; the official currency of the United States.

VCS: Verified Carbon Standard; an international voluntary carbon standard used to verify carbon credits generated by greenhouse gas emission reduction and removal projects.

WEC: World Energy Council.

WEF-PACI: World Economic Forum Partnering Against Corruption Initiative; an international initiative supporting the development of anti-corruption practices in the business community.

WPP: Wind Power Plant; a power production plant that converts wind energy into electricity through wind turbines.

YASED: International Investors Association.

YEK-G: Renewable Energy Resource Guarantee System; a system in Türkiye that enables electricity consumers to track and certify that the electricity consumed has been generated from renewable energy sources.

YTU: Yıldız Technical University.

ZES: Zorlu Energy Solutions; a brand operating in the field of electric vehicle charging solutions.

GRI Content Index

GRI 1: Foundation 2021

GAMA Enerji has reported the information cited in this GRI content index for the period of 1 January -31 December 2025 in accordance with the GRI Standards.

GRI Standards	Disclosure	Page numbers, disclosures and/or URL	Exclusions
Corporate Profile, Corporate Governance and Risk Management			
GRI 2: General Disclosures 2021	2-1 Organizational details	About GAMA Enerji, p.14 Partnership Structure, p.22 GAMA Enerji Subsidiaries, p.24 Certifications, p.28	-
	2-2 Entities included in the organization’s sustainability reporting	About the Report, p.4 GAMA Enerji Subsidiaries, p.24	-
	2-3 Reporting period, frequency and contact point	About the Report, p.4	-
	2-4 Restatements of information	Financial Performance Indicators, p.124	-
	2-5 External assurance	Combating Climate Change, p.72	-
	2-6 Activities, value chain and other business relationships	GAMA Enerji Subsidiaries, p.24 Corporate Governance Approach, p.32 Stakeholder Engagement, p.100 Responsible Supply Chain Management, p.106 Customer Satisfaction Approach, p.109	-
	2-7 Employees	Human Resources Approach, p.86 Occupational Health and Safety, p.96 Social Performance Indicators, p.127	-
	2-8 Workers who are not employees	Occupational Health and Safety, p.96 Responsible Supply Chain Management, p.106 Social Performance Indicators, p.127	-
	2-9 Governance structure and composition	Corporate Governance Approach, p.32 Organizational Structure, p.33 Sustainability Governance Structure, p.48	-
	2-10 Nomination and selection of the highest governance body		Confidentiality Restrictions GAMA Enerji as a private company does not disclose publicly the details of board members, other relations etc.
	2-11 Chair of the highest governance body	Organizational Structure, p.33	-
	2-12 Role of the highest governance body in overseeing the management of impacts	Organizational Structure, p.33 Sustainability Governance Structure, p.48	-
	2-13 Delegation of responsibility for managing impacts	Organizational Structure, p.33 Sustainability Governance Structure, p.48	-
	2-14 Role of the highest governance body in sustainability reporting	Sustainability Governance Structure, p.48	-
	2-15 Conflicts of interest	Ethics and Transparency, p.40	-

GRI 2: General Disclosures 2021	2-16 Communication of critical concerns	Ethics and Transparency, p.40 Corporate Governance Approach, p.32 Sustainability Governance Structure, p.48 No critical issue has been communicated to GAMA Enerji during the reporting period.	-
	2-17 Collective knowledge of the highest governance body	Organizational Structure, p.33 Sustainability Governance Structure, p.48	-
	2-18 Evaluation of the performance of the highest governance body		Confidentiality Restrictions As a private company, GAMA Enerji keeps its performance evaluation methods confidential in accordance with the company’s governance policies.
	2-19 Remuneration policies	Sustainability Policy, p.50 Human Resources Approach, p.86 Diversity, Equity and Inclusion, p.90	-
	2-20 Process to determine remuneration	Human Resources Approach, p.86 Diversity, Equity and Inclusion, p.90	-
	2-21 Annual total compensation ratio		Confidentiality Restrictions As a private company, GAMA Enerji keeps its remuneration data confidential and does not disclose it to the public, in accordance with internal policies.
	2-22 Statement on sustainable development strategy	Ethics and Transparency, p.40 Sustainability Policy, p.50 Company’s Sustainability Targets, p.58	-
	2-23 Policy commitments	Ethics and Transparency, p.40 Sustainability Policy, p.50 Human Resources Approach, p.86	-
	2-24 Embedding policy commitments	Management Systems, Internal Control and Audit, p.38 Sustainability Governance Structure, p.48	-
	2-25 Processes to remediate negative impacts	Ethics and Transparency, p.40 Combating Climate Change, p.72 Energy Management, p.74 Water Management, p.78 Waste Management, p.80 Occupational Health and Safety, p.96 Stakeholder Engagement, p.100 Responsible Supply Chain Management, p.106	-
	2-26 Mechanisms for seeking advice and raising concerns	Ethics and Transparency, p.40 Employee Satisfaction, p.88 Stakeholder Engagement, p.100	-
	2-27 Compliance with laws and regulations	Management Systems, Internal Control and Audit, p.38 Ethics and Transparency, p.40	-
	2-28 Membership associations	Membership Affiliations and Collaborations, p.27	-
	2-29 Stakeholder engagement	Stakeholder Engagement, p.100 Responsible Supply Chain Management, p.106	-
	2-30 Percentage of employees subject to collective bargaining agreements	Human Resources Approach, p.86	GAMA Enerji has no employees covered by collective labor agreements.

Corporate Profile, Corporate Governance and Risk Management			
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Double Materiality Analysis, p.54	-
	3-2 List of material topics	Double Materiality Analysis, p.54 - Digitalization and R&D - Occupational Health and Safety - Energy and Operational Efficiency - Employee Commitment and Talent Management - Combating Climate Change - Business Ethics and Reputation - Corporate Risk Management - Water Management - Responsible Supply Chain Management - Biodiversity - Corporate Social Responsibility and Contribution to Society - Stakeholder Engagement - Diversity, Equal Opportunity and Inclusion	
Digitalization and R&D			
GRI 3: Material Topics 2021	3-3 Management of material topics	Digitalization and R&D, p.118	-
Occupational Health and Safety			
GRI 3: Material Topics 2021	3-3 Management of material topics	Occupational Health and Safety, p.96 Social Performance Indicators, p.127	-
GRI 403 Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Occupational Health and Safety, p.96	-
	403-2 Hazard identification, risk assessment, and incident investigation	Occupational Health and Safety, p.96 Social Performance Indicators, p.127	-
	403-3 Occupational health services	Occupational Health and Safety, p.96 Social Performance Indicators, p.127	-
	403-4 Worker participation, consultation, and communication on occupational health and safety	Occupational Health and Safety, p.96	-
	403-5 Worker training on occupational health and safety	Occupational Health and Safety, p.96 Social Performance Indicators, p.127	-
	403-6 Promotion of worker health	Occupational Health and Safety, p.96	-
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Occupational Health and Safety, p.96	-
	403-9 Work-related injuries	Social Performance Indicators, p.127	-
Energy and Operational Efficiency			
GRI 3: Material Topics 2021	3-3 Management of material topics	Energy Management, p.74	-
GRI 302: Energy 2016	302-1 Energy consumption within the organization	Energy Management, p.74 Environmental Performance Indicators, p.125	-
	302-4 Reduction of energy consumption	Energy Management, p.74	-

Employee Commitment and Talent Management			
GRI 3: Material Topics 2021	3-3 Management of material topics	Employee Satisfaction, p.88 Talent Management and Career Development, p.92	-
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Social Performance Indicators, p.127	-
	401-3 Parental leave	Social Performance Indicators, p.127	-
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Social Performance Indicators, p.127	-
	404-2 Programs for upgrading employee skills and transition assistance programs	Talent Management and Career Development, p.92 Social Performance Indicators, p.127	-
	404-3 Percentage of employees receiving regular performance and career development reviews	Talent Management and Career Development, p.92	-
Combating Climate Change			
GRI 3: Material Topics 2021	3-3 Management of material topics	Combating Climate Change, p.72	-
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Combating Climate Change, p.72 Environmental Performance Indicators, p.125	-
	305-2 Energy indirect (Scope 2) GHG emissions	Combating Climate Change, p.72 Environmental Performance Indicators, p.125	-
	305-3 Other indirect (Scope 3) GHG emissions	Combating Climate Change, p.72 Environmental Performance Indicators, p.125	-
	305-5 Reduction of GHG emissions	Combating Climate Change, p.72 Sustainability Policy, p.50 Environmental Performance Indicators, p.125	-
Business Ethics and Reputation			
GRI 3: Material Topics 2021	3-3 Management of material topics	Ethics and Transparency, p.40	-
GRI 205: Anticorruption 2016	205-1 Operations assessed for risks related to corruption	Ethics and Transparency, p.40	-
	205-2 Communication and training about anti-corruption policies and procedures	Ethics and Transparency, p.40	-
	205-3 Confirmed incidents of corruption and actions taken	Ethics and Transparency, p.40 No confirmed cases of corruption or bribery were identified during the reporting period.	-
Corporate Risk Management			
GRI 3: Material Topics 2021	3-3 Management of material topics	Risk Management Approach, p.42	-

Water Management			
GRI 3: Material Topics 2021	3-3 Management of material topics	Water Management, p.78	-
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	Water Management, p.78	-
	303-3 Water withdrawal	Water Management, p.78 Environmental Performance Indicators, p.125	-
	303-5 Water consumption	Water Management, p.78 Environmental Performance Indicators, p.125	-
Responsible Supply Chain Management			
GRI 3: Material Topics 2021	3-3 Management of material topics	Responsible Supply Chain Management, p.106	-
GRI 308: Supplier Environmental Assessment 2016	308-2 Negative environmental impacts in the supply chain and actions taken	Responsible Supply Chain Management, p.106	-
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	Responsible Supply Chain Management, p.106 Social Performance Indicators, p.127	-
	414-2 Negative social impacts in the supply chain and actions taken	Responsible Supply Chain Management, p.106 Social Performance Indicators, p.127	-
Biodiversity			
GRI 3: Material Topics 2021	3-3 Management of material topics	Biodiversity, p.82	-
GRI 101: Biodiversity 2024	101-1 Policies to halt and reverse biodiversity loss	Biodiversity, p.82	-
	101-2 Management of biodiversity impacts	Biodiversity, p.82	-
	101-5 Locations with biodiversity impacts	Biodiversity, p.82	-
Corporate Social Responsibility and Contribution to Society			
GRI 3: Material Topics 2021	3-3 Management of material topics	Corporate Social Responsibility and Community Investments, p.110 Social Performance Indicators, p.127	-
Stakeholder Engagement			
GRI 3: Material Topics 2021	3-3 Management of material topics	Stakeholder Engagement, p.100	-

Diversity, Equal Opportunity and Inclusion			
GRI 3: Material Topics 2021	3-3 Management of material topics	Diversity, Equity and Inclusion, p.90	-
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Organizational Structure, p.33 Diversity, Equity and Inclusion, p.90 Social Performance Indicators, p.127	-
	405-2 Ratio of basic salary and remuneration of women to men	Social Performance Indicators, p.127	-
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	Human Resources Approach, p.86 Diversity, Equity and Inclusion, p.90 No cases of discrimination were reported during the reporting period.	-



GAMA ENERJİ

SUSTAINABILITY REPORT

GAMA Binası
Nergiz Sokak No: 9
06560 Yenimahalle / Ankara, Türkiye
T: +90 (312) 248 46 00
F: +90 (312) 248 46 01
E-Mail: energy@gamaenergy.com
enerji.gama.com.tr/en

Content and Consulting:
ESCARUS (TSKB Sustainability Consultancy)



Graphic Design:
Özge Egemen, kirmizitasarim.com