

C0. Introduction

C0.1

(C0.1) Give a general description and introduction to your organization.

Türk Telekom, with 178 years of history, is the first integrated telecommunications operator in Turkey. Türk Telekom has continued to bring the newest and most advanced communication technologies to the Turkish people by realizing many firsts in its sector. founder of the Internet backbone in Turkey and 282 thousand kilometers of fiber network with the main provider Turk Telekom; but also broadband, mobile and fixed phone and TV products to 46 million subscribers, is offering one of Turkey's first integrated telecom operator. In 2015, Türk Telekomünikasyon A.Ş. adopted a "customer-oriented" and integrated structure in order to respond to the rapidly changing communication and technology needs of customers in the most powerful and accurate way, while maintaining the legal entities of Avea İletişim Hizmetleri A.Ş. and TTNET A.Ş. intact and adhering to the rules and regulations to which they are subject. Having a wide service network and product range in the fields of individual and corporate services, Türk Telekom unified its mobile, internet, phone and TV products and services under the single "Türk Telekom" brand as of January 2016. "Turkey's Multiplay Provider" Türk Telekom has 14.4 million fixed access lines, 10.9 million broadband and 21.5 million mobile subscribers as of March 31, 2017. Türk Telekom Group Companies provide services in all 81 cities of Turkey with 33.447 employees with the vision of introducing new technologies to Turkey and accelerating Turkey's transformation into an information society. Türk Telekomünikasyon A.Ş., providing PSTN and wholesale broadband services, owns 100% of mobile operator Avea İletişim Hizmetleri A.Ş., retail internet services, IPTV, satellite TV, Web TV, Mobile TV, Smart TV services provider TTNET A.Ş., TV Broadcasting and VOD services provider Net Ekran Companies, convergence technologies company Argela Yazılım ve Bilişim Teknolojileri A.Ş., IT solution provider Innova Bilişim Çözümleri A.Ş., online education software company Sebit Eğitim ve Bilgi Teknolojileri A.Ş., call center company AssisTT Rehberlik ve Müşteri Hizmetleri A.Ş., wholesale data and capacity service provider Türk Telekom International and its subsidiaries.

C0.2

(C0.2) State the start and end date of the year for which you are reporting data.

	Start date	End date	Indicate if you are providing emissions data for past reporting years	Select the number of past reporting years you will be providing emissions data for
Reporting year	January 1 2019	December 31 2019	No	<Not Applicable>

C0.3

(C0.3) Select the countries/areas for which you will be supplying data.

Turkey

C0.4

(C0.4) Select the currency used for all financial information disclosed throughout your response.

TRY

C0.5

(C0.5) Select the option that describes the reporting boundary for which climate-related impacts on your business are being reported. Note that this option should align with your chosen approach for consolidating your GHG inventory.

Operational control

C1. Governance

C1.1

(C1.1) Is there board-level oversight of climate-related issues within your organization?

Yes

C1.1a

(C1.1a) Identify the position(s) (do not include any names) of the individual(s) on the board with responsibility for climate-related issues.

Position of individual(s)	Please explain
Other, please specify (Corporate Risk and Business Continuity Directorate)	Sustainability efforts are sponsored and monitored by the CEO. Climate Change issues are handled by the Corporate Risk and Business Continuity Directorate under Environmental Risks. Corporate Risk and Business Continuity Directorate reports to Committee of Early Risk Detection which is composed of 3 board members. Corporate Risk Management Directorate works with Occupational Health and Safety Directorate on this environmental risk.

C1.1b

(C1.1b) Provide further details on the board’s oversight of climate-related issues.

Frequency with which climate-related issues are a scheduled agenda item	Governance mechanisms into which climate-related issues are integrated	Scope of board-level oversight	Please explain
Scheduled – some meetings	Reviewing and guiding risk management policies	<Not Applicable>	Determined risks are taken into the agenda according to their relevance and importance. Therefore, climate change risks under environmental risks category are handled in a similar fashion by Committee of Early Risk Detection. When a risk is taken into the agenda of the committee, it means that causes and effects of the risks, periodic prevention controls, risk calculations and metrics, actions, targets, priorities, roadmaps, demands and needs are shared with the board through the committee. This in turn grants support from the board.

C1.2

(C1.2) Provide the highest management-level position(s) or committee(s) with responsibility for climate-related issues.

Name of the position(s) and/or committee(s)	Reporting line	Responsibility	Coverage of responsibility	Frequency of reporting to the board on climate-related issues
Environmental, Health, and Safety manager	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	Annually
Other, please specify (Risk Analyst)	<Not Applicable>	Assessing climate-related risks and opportunities	<Not Applicable>	Annually
Chief Executive Officer (CEO)	<Not Applicable>	Other, please specify (Reviewing climate-related risks and opportunities)	<Not Applicable>	Annually
Risk manager	<Not Applicable>	Managing climate-related risks and opportunities	<Not Applicable>	Annually
Other, please specify (Board Member)	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	Annually

C1.2a

(C1.2a) Describe where in the organizational structure this/these position(s) and/or committees lie, what their associated responsibilities are, and how climate-related issues are monitored (do not include the names of individuals).

Climate Change issues are taken into agenda as Environmental Risks in the applications of Committee of Early Risk Detection at least once a year (depending on the demand/need this number is increased). Sustainability and risk management efforts are presented to the CEO, responsible business units and the committee. Responsibility of environmental risks and sustainability efforts are under Risk Management Directorate, risk analysts and relative director/s. In addition to that, the leadership regarding low-carbon products and services is distributed to different units, as technological solutions for enabling climate change opportunities are managed by different skill sets. Therefore, there is a collaboration between different business units both to cut our company-wise emissions and enabling technological solutions for different stakeholders to minimize GHG emissions overall. All of these mentioned managers are reporting directors who are reporting to the top management.

C1.3

(C1.3) Do you provide incentives for the management of climate-related issues, including the attainment of targets?

	Provide incentives for the management of climate-related issues	Comment
Row 1	Yes	Every business unit has annual targets according to their job descriptions. Such as energy reduction targets/projects, fuel reduction targets/projects and CDP related targets. When a target assigned to a business unit is achieved, responsible employees are granted a performance bonus parallel to their contribution. If a target is not achieved, managers of responsible employee/s arrange a feedback meeting to give constructive feedback. In addition, performance score of relative employee/s drop when a target is not achieved.

C1.3a

(C1.3a) Provide further details on the incentives provided for the management of climate-related issues (do not include the names of individuals).

Entitled to incentive	Type of incentive	Activity incentivized	Comment
Environmental, health, and safety manager	Monetary reward	Energy reduction target	EHS Manager is the responsible for the implementation of overall climate change efforts.
Facilities manager	Monetary reward	Emissions reduction target	All facility managers are responsible for minimizing the GHG emissions due to their operations.
Energy manager	Monetary reward	Energy reduction target	Energy related risks are considered within the Enterprise Risk Management System and hence risk managers are incentivized through climate related issues. Also, they have the annual targets regarding the electricity use reduction.
Other, please specify (Fleet manager)	Monetary reward	Efficiency project	Fuel optimization by managing the routes as well as the car stock optimization in order to cut vehicle-based emissions.
Other, please specify (Fleet manager)	Monetary reward	Efficiency project	Personnel commuting routes optimization
Facilities manager	Monetary reward	Emissions reduction project	By optimizing the employee settling, 50+ buildings will be evacuated, and all emissions related electricity use and fuel consumption will be cut. Also, automizing some other buildings (6) emissions will be cut.
Chief Executive Officer (CEO)	Monetary reward	Emissions reduction target Energy reduction target	Every business unit has annual targets according to their job descriptions. Such as energy reduction targets/projects, fuel reduction targets/projects and CDP related targets. When a target assigned to a business unit is achieved, responsible employees are granted a performance bonus parallel to their contribution.

C2. Risks and opportunities

C2.1

(C2.1) Does your organization have a process for identifying, assessing, and responding to climate-related risks and opportunities?

Yes

C2.1a

(C2.1a) How does your organization define short-, medium- and long-term time horizons?

	From (years)	To (years)	Comment
Short-term	0	1	
Medium-term	1	3	
Long-term	3	10	

C2.1b

(C2.1b) How does your organization define substantive financial or strategic impact on your business?

According to the Corporate Risk Management principles, "substantive financial or strategic impact" is defined as financial impact which effects 250 million Turkish Liras or more. Climate Change risks which are under Environmental Risks are not evaluated under this definition.

C2.2

(C2.2) Describe your process(es) for identifying, assessing and responding to climate-related risks and opportunities.

Value chain stage(s) covered

Direct operations
Upstream
Downstream

Risk management process

Integrated into multi-disciplinary company-wide risk management process

Frequency of assessment

Annually

Time horizon(s) covered

None of the above/ Not defined

Description of process

Climate Change risks are evaluated under sustainability and environmental risks. Through this evaluation, risks that can emerge from our processes are considered, suppliers are evaluated in parallel to climate change and Türk Telekom conducts its applications and develop products while minimizing the negative impact on the environment.

C2.2a

(C2.2a) Which risk types are considered in your organization's climate-related risk assessments?

	Relevance & inclusion	Please explain
Current regulation	Relevant, always included	Corporate Risk Management monitors and applies changes to comply with updates on current regulations, benchmarks and regulative changes which are deemed best practices. In addition, we are following the current regulation in terms of GHG emission standards and scope, GHG inventories, and so on. Recently we are not subjected to severe changes due to the current regulation.
Emerging regulation	Relevant, always included	Corporate Risk Management monitors and applies changes to comply with updates on current regulations, benchmarks and regulative changes which are deemed best practices. In addition, after Paris Agreement and SDGs were introduced, the international stakeholders have started to take climate risks into consideration accordingly. Even though our government did not take place in Paris Agreement, there will still be some regulation regarding cutting the emissions, for example introducing the carbon taxes in some certain sectors, may have an impact on our business.
Technology	Relevant, sometimes included	As being an ICT company, technology risks are always considered primarily, and these risks could also provide some opportunities for our business.
Legal	Not relevant, explanation provided	Legal risks with regards to climate change is not considered as a risk area for the company.
Market	Not relevant, included	Raw material, supply and service related risks are indirectly monitored under the risk inventory as risks that could be caused by climate change. Climate-related risks can be considered as market risks as in case of increase in demand to low-carbon products . If our competitors will proactively supply low-carbon products and services, this could result in a loss of market share.
Reputation	Relevant, always included	Türk Telekom identifies climate change as a potential source of reputational risk tied to changing customer or community perceptions. This could damage the regulatory environment and investor relationships. It could also make Türk Telekom less attractive to current or future employees. That is why we consider climate related risks a potential threat to our reputation and try to manage them proactively.
Acute physical	Relevant, always included	Acute physical risks may affect our business due to the fluctuating weather temperature. As our cooling systems are a major source of energy use, hot weather conditions may end up increased operational costs for us. Natural disasters such as Flood and earthquake are considered in the scope of business continuity risks.
Chronic physical	Not relevant, explanation provided	Chronic physical risks are not evaluated as top risks. We are more vulnerable to acute physical risks whereas chronic ones are easier to manage.

C2.3

(C2.3) Have you identified any inherent climate-related risks with the potential to have a substantive financial or strategic impact on your business?

No

C2.3b

(C2.3b) Why do you not consider your organization to be exposed to climate-related risks with the potential to have a substantive financial or strategic impact on your business?

	Primary reason	Please explain
Row 1	Evaluation in process	We are planning to assess the climate related risks as they also envision the opportunities for our business.

C2.4

(C2.4) Have you identified any climate-related opportunities with the potential to have a substantive financial or strategic impact on your business?

Yes, we have identified opportunities but are unable to realize them

C2.4b

(C2.4b) Why do you not consider your organization to have climate-related opportunities?

	Primary reason	Please explain
Row 1	Opportunities exist, but we are unable to realize them	Climate change is not considered among the top risks, just because our business model does not rely heavily on fossil fuels. We are evaluating the energy-related risks in our business plan and in turn they can also be considered as climate-related risks, as well as opportunities. Even though those risks are identified and evaluated, we still do not consider them as climate-related risks and opportunities. Furthermore, as a technology company, we are aware of the fact that we can enable other companies and other sectors by providing innovative and low-carbon solutions. Next to our climate-related risks efforts, we will be surfacing the opportunities towards the low-carbon economy.

C3. Business Strategy

C3.1

(C3.1) Have climate-related risks and opportunities influenced your organization's strategy and/or financial planning?

Yes

C3.1a

(C3.1a) Does your organization use climate-related scenario analysis to inform its strategy?

No, but we anticipate using qualitative and/or quantitative analysis in the next two years

C3.1c

(C3.1c) Why does your organization not use climate-related scenario analysis to inform its strategy?

Climate-related issues are not considered as primary risk factors for the continuation of our business. Also, we are not providing our services in an energy-intensive sector, so that our share in the overall GHG emissions is relatively low. However, we are aware of the fact that we can still do more in terms of low-carbon products and services for enabling other sectors being sustainable. Therefore, we are considering carrying out scenario analysis in the upcoming reporting years as we can have somewhat significant effect on mitigation efforts. There are risk definitions being made under "environmental risks". Through those risks we are preparing to analyse scenario analysis. Defined risks are used to determine which scenarios are feasible and acceptable for our operations. In addition, there are plans to use these risk definition and scenario analysis applications to determine Science Based Targets.

C3.1d

(C3.1d) Describe where and how climate-related risks and opportunities have influenced your strategy.

	Have climate-related risks and opportunities influenced your strategy in this area?	Description of influence
Products and services	Yes	As a leading ICT company, Türk Telekom provides products and services which support the low-carbon economy, by spending efforts on decreasing its GHG emissions, as well as supporting different sectors with low-carbon product and service solutions. GHG management and combating climate change is one of the major issues for the company and those are already embedded into the company's overall strategy.
Supply chain and/or value chain	Yes	ICT is a fast-developing sector by facilitating many low carbon solutions. We are working to identify the needs of our customers and offer cutting-edge services that enable carbon reductions throughout the value chain (e.g. telepresence, cloud computing, increased access to broadband and improving network capabilities). We have numerous customer-facing low carbon solutions such as e-billing and low energy phones. There is always an allocated budget for supporting the development of such products and services and we keep innovating regarding the low-carbon ones.
Investment in R&D	Yes	To facilitate the low-carbon or even decarbonized future and markets, Türk Telekom invests in research and development and other innovative ideas widely. By learning from the positive environmental impact of our products and services, we keep ideating and prototyping new solutions which can make a difference throughout our value chain. There will be many more opportunities in this field and hence Türk Telekom allocates is predetermined budget for these activities.
Operations	Yes	The governance model enables to manage the issue in the top level (senior manager and sustainability committee directly reporting to the board) which also reveals the understanding the importance of the issue. There are a lot of recognition and incentives towards reduction of emissions as well as innovative ideas for different sectors to decrease their emissions. The company has a Climate Change Policy statement which frames the governance and the overall management of the issue. According to that, climate change related issues are considered in the relevant departments and units and are reported to the sustainability committee which directly reports to the Board.

C3.1e

(C3.1e) Describe where and how climate-related risks and opportunities have influenced your financial planning.

	Financial planning elements that have been influenced	Description of influence
Row 1	None of the above	There are plans to assess the climate related risks as we also envision the opportunities for Türk Telekom. Climate related risks are not considered among the top risks but as a technology company, we are aware of the fact that we can enable other companies and other sectors by providing innovative and low-carbon solutions. In addition, Türk Telekom's insurance deals and policies consider natural disasters in its planning and budgeting stage.

C3.1f

(C3.1f) Provide any additional information on how climate-related risks and opportunities have influenced your strategy and financial planning (optional).

C4. Targets and performance

C4.1

(C4.1) Did you have an emissions target that was active in the reporting year?

No target

C4.1c

(C4.1c) Explain why you did not have an emissions target, and forecast how your emissions will change over the next five years.

	Primary reason	Five-year forecast	Please explain
Row 1	We are planning to introduce a target in the next two years	There is no forecast could be done as the future projections of the company is not clear yet due to the re-organization. Investment decisions will be made by the top management, and according to the growth projections, we can run a forecasting project for our emissions.	Rather than direct emission targets there are targets set under "environmental goals" where different business units have climate related targets such as energy reduction, electricity reduction and optimization. These targets are determined according to the job description and operating field of different business units. Through these targets and risk determination processes emission targets can be planned and set in the upcoming reporting years.

C4.2

(C4.2) Did you have any other climate-related targets that were active in the reporting year?

No other climate-related targets

C4.3

(C4.3) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.

Yes

C4.3a

(C4.3a) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e (only for rows marked *)
Under investigation		
To be implemented*		
Implementation commenced*		
Implemented*	6	11214
Not to be implemented		

C4.3b

(C4.3b) Provide details on the initiatives implemented in the reporting year in the table below.

Initiative category & Initiative type

Other, please specify	Other, please specify (Energy efficiency: Processes (Next Gen Network Transformation))
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Estimated annual CO2e savings (metric tonnes CO2e)

2970

Scope(s)

Scope 2 (location-based)

Voluntary/Mandatory

Voluntary

Annual monetary savings (unit currency – as specified in C0.4)

6200000

Investment required (unit currency – as specified in C0.4)

0

Payback period

1-3 years

Estimated lifetime of the initiative

6-10 years

Comment

Investment required is given as "zero" since all the investment was made in the previous reporting year where the initiative has started. NGN Transformation project: The migration to IP based soft switch network infrastructure has been reducing the number of exchanges and operational expenses. The telephone network covering all of Turkey has been migrated into an IP based network. With this migration of the existing PSTN into IP infrastructure, every citizen in Turkey enjoys a large number of value-added services wherever they are. As a result of the reduction of exchange areas, this project enables a reduction in cooling needs, which further reduces GHG emissions.

Initiative category & Initiative type

Energy efficiency in buildings	Other, please specify (Building services: Building Controls)
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Estimated annual CO2e savings (metric tonnes CO2e)

1909

Scope(s)

Scope 2 (location-based)

Voluntary/Mandatory

Voluntary

Annual monetary savings (unit currency – as specified in C0.4)

2000000

Investment required (unit currency – as specified in C0.4)

8400000

Payback period

1-3 years

Estimated lifetime of the initiative

16-20 years

Comment

DX Air Conditioning Transformation project: Air conditioning systems have been replaced with new generation energy efficient conditioning systems. As a result of this transformation, operation costs and energy consumption levels have decreased. The payback period is considered as 1-3 years, as this is a continuous project, therefore investment cost is distributed over years.

Initiative category & Initiative type

Energy efficiency in buildings	Other, please specify (Building services: Building Controls)
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Estimated annual CO2e savings (metric tonnes CO2e)

3535

Scope(s)

Scope 2 (location-based)

Voluntary/Mandatory

Voluntary

Annual monetary savings (unit currency – as specified in C0.4)

4000000

Investment required (unit currency – as specified in C0.4)

500000

Payback period

<1 year

Estimated lifetime of the initiative

6-10 years

Comment

Air Conditioning optimization projects: Air conditioning systems are optimized company-wide by Back-up applications, fan optimization solutions, Wall-Type Air Conditioner Optimization Projects, Operation of Air Conditioning Indoor Fans by Driver, DC Energy Halls Set Value Increase which resulted in energy savings.

Initiative category & Initiative type

Energy efficiency in buildings	Other, please specify (Building fabric, Optimization of indoor space use)
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Estimated annual CO2e savings (metric tonnes CO2e)

424

Scope(s)

Scope 2 (location-based)

Voluntary/Mandatory

Voluntary

Annual monetary savings (unit currency – as specified in C0.4)

500000

Investment required (unit currency – as specified in C0.4)

25000

Payback period

<1 year

Estimated lifetime of the initiative

16-20 years

Comment

The optimization of system rooms as well as their consolidation. Non-used air conditioners are used somewhere else, therefore emissions are cut.

Initiative category & Initiative type

Energy efficiency in buildings	Other, please specify (Building Services, Building Controls)
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Estimated annual CO2e savings (metric tonnes CO2e)

2333

Scope(s)

Scope 2 (location-based)

Voluntary/Mandatory

Voluntary

Annual monetary savings (unit currency – as specified in C0.4)

4700000

Investment required (unit currency – as specified in C0.4)

3100000

Payback period

<1 year

Estimated lifetime of the initiative

16-20 years

Comment

Expired air conditioners which cool down the system rooms are changed with the new technology ones.

Initiative category & Initiative type

Low-carbon energy generation	Solar PV
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Estimated annual CO2e savings (metric tonnes CO2e)

106

Scope(s)

Scope 2 (location-based)

Voluntary/Mandatory

Voluntary

Annual monetary savings (unit currency – as specified in C0.4)

70000

Investment required (unit currency – as specified in C0.4)

100000

Payback period

4-10 years

Estimated lifetime of the initiative

21-30 years

Comment

Different power (3kW-30kW) solar energy systems have been installed in 16 power plants.

C4.3c

(C4.3c) What methods do you use to drive investment in emissions reduction activities?

Method	Comment
Dedicated budget for other emissions reduction activities	Every year, when the yearly budget is determined, the amount allocated for saving and efficiency projects, which in turn cause emissions reduction, is also determined. Hence, every year there is a certain allocation for emission reduction activities. In June 5th, we have signed a 6 year term 100 million loan agreement with EBRD (total cost LIBOR + 2.85%) to finance our investments on sustainability (such as energy efficiency).

C4.5

(C4.5) Do you classify any of your existing goods and/or services as low-carbon products or do they enable a third party to avoid GHG emissions?

Yes

C4.5a

(C4.5a) Provide details of your products and/or services that you classify as low-carbon products or that enable a third party to avoid GHG emissions.**Level of aggregation**

Product

Description of product/Group of products

Cloud-eye system is a remote camera system and a surveillance agent which helps to security bodies to investigate issues easily. It enables official security authorities to reach more areas virtually, which results in less patrolling. By providing optimization and efficiency, this technology avoids unnecessary emissions from patrolling.

Are these low-carbon product(s) or do they enable avoided emissions?

Avoided emissions

Taxonomy, project or methodology used to classify product(s) as low-carbon or to calculate avoided emissions

Evaluating the carbon-reducing impacts of ICT

% revenue from low carbon product(s) in the reporting year

0.01

% of total portfolio value

<Not Applicable>

Asset classes/ product types

<Not Applicable>

Comment

Total revenue from Cloud-eye system was 580,000 TL in 2019.

Level of aggregation

Group of products

Description of product/Group of products

With Smart Cities, a new generation urbanism approach and new generation city technologies have been developed to develop integrated solutions tailored to the needs of each province, thus saving resources and thus serving the sustainable society. Türk Telekom Smart Cities, which has been implemented to permanently facilitate the lives of citizens and public authorities by using information communication technologies, enables to make forward decisions by processing and interpreting the data collected from different channels such as sensors and vehicles. Smart traffic, smart environment, smart health, smart security, smart energy, and smart management under the headings of the new generation of applications offered city life is facilitated. Turkey's first integrated new generation city project was implemented in Karaman. Subsequently, Antalya and Kars are becoming new generation cities. The smart applications developed by Türk Telekom are integrated into public services and urban life. All services in public services and energy saving from traffic to health are provided through a single interface in the Smart City Operations Center and over 20 applications including smart traffic, environment, health, safety and energy applications are included. With these applications in Karaman and Antalya, 25% savings in electricity and 30% in irrigation were achieved. Due to the decrease in time spent in traffic, carbon emissions decreased by 25% and traffic accidents were reduced by up to 40%. More than 400 people have been followed up for chronic diseases and their health conditions have been followed and periodic controls have been started. Over 100,000 people have benefited from the open-air Wi-Fi service and have free access to information from these points. In addition to the 3 cities currently in progress, it is planned to be expanded in 81 cities. In 2019, Türk Telekom added Smart Cities mobile app (in Artvin) and Smart Cities furniture (in Trabzon) to its portfolio. To facilitate the digital transformation of industrial zones, Türk Telekom have started offering innovative and environment considerate technological solutions. Türk Telekom offers Smart Campus that include planning, security and life in campus solutions. Smart Campus were presented to Turkish-German University board and smart lighting, irrigation and construction efforts were started.

Are these low-carbon product(s) or do they enable avoided emissions?

Avoided emissions

Taxonomy, project or methodology used to classify product(s) as low-carbon or to calculate avoided emissions

Evaluating the carbon-reducing impacts of ICT

% revenue from low carbon product(s) in the reporting year

0.31

% of total portfolio value

<Not Applicable>

Asset classes/ product types

<Not Applicable>

Comment

Total revenue from Smart Cities were 73.6 million TL. Karaman (20 different applications) Kars (12 different applications) Antalya Metropolitan Municipality (10 different applications) Kırşehir Municipality (7 different applications) Mersin Metropolitan Municipality (Smart Intersection) Edirne Municipality (City Information Screen) Osmaniye Kadirli Municipality (Chronic Patient Monitoring) Erzurum Yakutiye Municipality (City Information Screen) Diyarbakır Metropolitan Municipality (City Information Screen) Giresun Municipality (Smart City Furniture) Osmaniye Municipality (Smart City Furniture) Bayburt Demirözü Municipality (Smart City Furniture) Kahramanmaraş Metropolitan Municipality (Energy Bicycle)

Level of aggregation

Company-wide

Description of product/Group of products

Video conference technology is widely used among our facilities, headquarters, and different locations. Videoconference allows for communication between people in two or more locations through simultaneous two-way video and audio transmissions. Via this service, several users in different locations are able to communicate without the need to travel and meet face to face. We have done more than 15.5 thousand VK rooms booking.

Are these low-carbon product(s) or do they enable avoided emissions?

Avoided emissions

Taxonomy, project or methodology used to classify product(s) as low-carbon or to calculate avoided emissions

Evaluating the carbon-reducing impacts of ICT

% revenue from low carbon product(s) in the reporting year

0

% of total portfolio value

<Not Applicable>

Asset classes/ product types

<Not Applicable>

Comment

As this is a company-wide service, there is no revenue related. We avoided approximately 1,300 ton CO₂e_q according to our calculations. Calculation methodology: Emission calculation due to the avoided emission is based on several assumptions. Not every video conference is causing an avoided flight, therefore, we use the fraction of 0.5. In addition to that, each VK has four participants on average, each meeting which avoids a flight is actually avoiding for two participants. Therefore we, in total, avoid around 80 thousands domestic flights which in Turkey can be calculated as 500 km of distance.

C5. Emissions methodology

C5.1

(C5.1) Provide your base year and base year emissions (Scopes 1 and 2).

Scope 1

Base year start

January 1 2015

Base year end

December 31 2015

Base year emissions (metric tons CO2e)

117770.5

Comment

Scope 2 (location-based)

Base year start

January 1 2015

Base year end

December 31 2015

Base year emissions (metric tons CO2e)

643011.2

Comment

Scope 2 (market-based)

Base year start

January 1 2015

Base year end

December 31 2015

Base year emissions (metric tons CO2e)

643011.2

Comment

C5.2

(C5.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.

IPCC Guidelines for National Greenhouse Gas Inventories, 2006

C6. Emissions data

C6.1

(C6.1) What were your organization's gross global Scope 1 emissions in metric tons CO2e?

Reporting year

Gross global Scope 1 emissions (metric tons CO2e)

112729.6

Start date

<Not Applicable>

End date

<Not Applicable>

Comment

C6.2

(C6.2) Describe your organization's approach to reporting Scope 2 emissions.

Row 1

Scope 2, location-based

We are reporting a Scope 2, location-based figure

Scope 2, market-based

We are reporting a Scope 2, market-based figure

Comment

We purchase electricity from the main grid. Turkish Electricity Grid's RECs certification, - direct contracts (low-carbon, renewable etc.) - residual mix totals attributes are not available and that's why our market-based Scope 2 emissions are same as our location-based Scope 2 emissions.

C6.3

(C6.3) What were your organization's gross global Scope 2 emissions in metric tons CO2e?

Reporting year

Scope 2, location-based

712625.4

Scope 2, market-based (if applicable)

712625.4

Start date

<Not Applicable>

End date

<Not Applicable>

Comment

C6.4

(C6.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure?

No

C6.5

(C6.5) Account for your organization's gross global Scope 3 emissions, disclosing and explaining any exclusions.

Purchased goods and services

Evaluation status

Relevant, not yet calculated

Metric tonnes CO2e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

Capital goods

Evaluation status

Relevant, not yet calculated

Metric tonnes CO2e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

Fuel-and-energy-related activities (not included in Scope 1 or 2)

Evaluation status

Relevant, not yet calculated

Metric tonnes CO2e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

Upstream transportation and distribution

Evaluation status

Relevant, not yet calculated

Metric tonnes CO₂e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

Waste generated in operations

Evaluation status

Relevant, calculated

Metric tonnes CO₂e

474

Emissions calculation methodology

We calculated total emissions due to paper and cartridges use according to the number of use. The data is obtained internally.

Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

Please explain

Business travel

Evaluation status

Relevant, calculated

Metric tonnes CO₂e

1774.1

Emissions calculation methodology

Business travel data is gathered from the relevant supplier in terms of destinations and we converted and calculated them into GHG emissions. Domestic, European and transcontinental flights got different coefficients.

Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

Please explain

Employee commuting

Evaluation status

Relevant, calculated

Metric tonnes CO₂e

6600.5

Emissions calculation methodology

We gathered data from the relevant supplier and calculated the emissions according to the distances, vehicle size and engine emission type.

Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

Please explain

Upstream leased assets

Evaluation status

Not relevant, explanation provided

Metric tonnes CO₂e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

We do not have any leased assets in the upstream of our business.

Downstream transportation and distribution

Evaluation status

Not relevant, explanation provided

Metric tonnes CO₂e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

Downstream transportation and distribution do not fall into our scope for this response.

Processing of sold products

Evaluation status

Not relevant, explanation provided

Metric tonnes CO₂e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

Our products do not have any further processing after they are sold.

Use of sold products

Evaluation status

Relevant, not yet calculated

Metric tonnes CO₂e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

Our products and services are hard to be defined as energy use. Therefore, this part is not added into the calculations.

End of life treatment of sold products

Evaluation status

Relevant, not yet calculated

Metric tonnes CO₂e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

There are some targets and projects regarding the collection of e-waste and yet they are not considered as part of the emission calculations.

Downstream leased assets

Evaluation status

Not relevant, explanation provided

Metric tonnes CO₂e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

We do not have any downstream leased assets.

Franchises

Evaluation status

Not relevant, explanation provided

Metric tonnes CO2e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

We do not have any franchises. Therefore, they are not added into the calculation.

Investments

Evaluation status

Not relevant, explanation provided

Metric tonnes CO2e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

We do not have any further emissions due to the investments done in the reporting year.

Other (upstream)

Evaluation status

Not relevant, explanation provided

Metric tonnes CO2e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

There is no other emission source in the upstream.

Other (downstream)

Evaluation status

Not relevant, explanation provided

Metric tonnes CO2e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

There is no other emission source in the downstream.

C6.7

(C6.7) Are carbon dioxide emissions from biogenic carbon relevant to your organization?

No

C6.10

(C6.10) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

Intensity figure

0.00003488

Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

825355.1

Metric denominator

unit total revenue

Metric denominator: Unit total

2365700000

Scope 2 figure used

Location-based

% change from previous year

7.82

Direction of change

Decreased

Reason for change

Gross global combined Scope 1 and 2 emissions was 773,091.1 metric tons CO2e last year and unit total revenue was 20,430,900,000 which made the intensity figure 0.00003784. Both figures increased but the revenue increase was more than enough to compensate the increase in combined emissions. Therefore, a decrease in intensity is observed.

C7. Emissions breakdowns

C7.1

(C7.1) Does your organization break down its Scope 1 emissions by greenhouse gas type?

Yes

C7.1a

(C7.1a) Break down your total gross global Scope 1 emissions by greenhouse gas type and provide the source of each used greenhouse warming potential (GWP).

Greenhouse gas	Scope 1 emissions (metric tons of CO2e)	GWP Reference
CO2	11270.8	IPCC Fifth Assessment Report (AR5 – 20 year)
CH4	126.7	IPCC Fifth Assessment Report (AR5 – 20 year)
N2O	432.2	IPCC Fifth Assessment Report (AR5 – 20 year)

C7.2

(C7.2) Break down your total gross global Scope 1 emissions by country/region.

Country/Region	Scope 1 emissions (metric tons CO2e)
Turkey	112729.6

C7.3

(C7.3) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.

By activity

C7.3c

(C7.3c) Break down your total gross global Scope 1 emissions by business activity.

Activity	Scope 1 emissions (metric tons CO2e)
Data centers	2268
Base stations	26264
Transmission lines	40212
Buildings	16275
Transportation	27712

C7.5

(C7.5) Break down your total gross global Scope 2 emissions by country/region.

Country/Region	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)	Purchased and consumed electricity, heat, steam or cooling (MWh)	Purchased and consumed low-carbon electricity, heat, steam or cooling accounted for in Scope 2 market-based approach (MWh)
Turkey	712625.4	712625.4	1590834	2100

C7.6

(C7.6) Indicate which gross global Scope 2 emissions breakdowns you are able to provide.

By activity

C7.6c

(C7.6c) Break down your total gross global Scope 2 emissions by business activity.

Activity	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Data centers	31039	31039
Base stations	317285	317285
Transmission systems	347945	347945
Buildings	16357	16357

C7.9

(C7.9) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Increased

C7.9a

(C7.9a) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.

	Change in emissions (metric tons CO2e)	Direction of change	Emissions value (percentage)	Please explain calculation
Change in renewable energy consumption		<Not Applicable>		
Other emissions reduction activities		<Not Applicable>		
Divestment		<Not Applicable>		
Acquisitions		<Not Applicable>		
Mergers		<Not Applicable>		
Change in output		<Not Applicable>		
Change in methodology		<Not Applicable>		
Change in boundary	52264	Increased	6.76	We had 825,335.1 metric tons CO2e, due to our operations within Scope 1+2. This year this figure has changed into 773,091.1 tons of CO2e, due to our constant improvement practices in terms of energy use, which results in 52,264 tons CO2e. Hence, an increase in our emissions by 6.76% was observed. One of the reasons behind the increase is that we included our emissions sourcing from Fleet activities.
Change in physical operating conditions		<Not Applicable>		
Unidentified		<Not Applicable>		
Other		<Not Applicable>		

C7.9b

(C7.9b) Are your emissions performance calculations in C7.9 and C7.9a based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?

Location-based

C8. Energy

C8.1

(C8.1) What percentage of your total operational spend in the reporting year was on energy?

More than 5% but less than or equal to 10%

C8.2

(C8.2) Select which energy-related activities your organization has undertaken.

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	Yes
Consumption of purchased or acquired electricity	Yes
Consumption of purchased or acquired heat	No
Consumption of purchased or acquired steam	No
Consumption of purchased or acquired cooling	Yes
Generation of electricity, heat, steam, or cooling	No

C8.2a

(C8.2a) Report your organization's energy consumption totals (excluding feedstocks) in MWh.

	Heating value	MWh from renewable sources	MWh from non-renewable sources	Total (renewable and non-renewable) MWh
Consumption of fuel (excluding feedstock)	LHV (lower heating value)	0	203672	203672
Consumption of purchased or acquired electricity	<Not Applicable>	2100	1294903	1297003
Consumption of purchased or acquired heat	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Consumption of purchased or acquired steam	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Consumption of purchased or acquired cooling	<Not Applicable>	0	92258	92258
Consumption of self-generated non-fuel renewable energy	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Total energy consumption	<Not Applicable>	2100	1590834	1592934

C8.2b

(C8.2b) Select the applications of your organization's consumption of fuel.

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	Yes
Consumption of fuel for the generation of heat	Yes
Consumption of fuel for the generation of steam	No
Consumption of fuel for the generation of cooling	No
Consumption of fuel for co-generation or tri-generation	No

C8.2c

(C8.2c) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.

Fuels (excluding feedstocks)

Diesel

Heating value

LHV (lower heating value)

Total fuel MWh consumed by the organization

117942

MWh fuel consumed for self-generation of electricity

19685

MWh fuel consumed for self-generation of heat

0

MWh fuel consumed for self-generation of steam

<Not Applicable>

MWh fuel consumed for self-generation of cooling

<Not Applicable>

MWh fuel consumed for self-cogeneration or self-trigeneration

<Not Applicable>

Emission factor

2.6652

Unit

kg CO2e per m3

Emissions factor source

IPCC AR5 adjusted by the national emission factors released by the state.

Comment

98,257 MWh is consumed by vehicles use diesel as fuel.

Fuels (excluding feedstocks)

Fuel Oil Number 1

Heating value

LHV (lower heating value)

Total fuel MWh consumed by the organization

2247

MWh fuel consumed for self-generation of electricity

0

MWh fuel consumed for self-generation of heat

2247

MWh fuel consumed for self-generation of steam

<Not Applicable>

MWh fuel consumed for self-generation of cooling

<Not Applicable>

MWh fuel consumed for self-cogeneration or self-trigeneration

<Not Applicable>

Emission factor

3.1265

Unit

kg CO2e per m3

Emissions factor source

IPCC AR5 adjusted by the national emission factors released by the state.

Comment

Fuels (excluding feedstocks)

Natural Gas

Heating value

LHV (lower heating value)

Total fuel MWh consumed by the organization

53945

MWh fuel consumed for self-generation of electricity

0

MWh fuel consumed for self-generation of heat

53945

MWh fuel consumed for self-generation of steam

<Not Applicable>

MWh fuel consumed for self-generation of cooling

<Not Applicable>

MWh fuel consumed for self-cogeneration or self-trigeneration

<Not Applicable>

Emission factor

1.9422

Unit

kg CO2e per m3

Emissions factor source

IPCC AR5 adjusted by the national emission factors released by the state.

Comment

Fuels (excluding feedstocks)

Other Petroleum Gas

Heating value

LHV (lower heating value)

Total fuel MWh consumed by the organization

27423

MWh fuel consumed for self-generation of electricity

22657

MWh fuel consumed for self-generation of heat

0

MWh fuel consumed for self-generation of steam

<Not Applicable>

MWh fuel consumed for self-generation of cooling

<Not Applicable>

MWh fuel consumed for self-cogeneration or self-trigeneration

<Not Applicable>

Emission factor

2.23093

Unit

kg CO2e per m3

Emissions factor sourceIPCC AR5 adjusted by the national emission factors released by the state.

Comment

4,766 MWh of gasoline is used for car fleet.

Fuels (excluding feedstocks)

Coal

Heating value

LHV (lower heating value)

Total fuel MWh consumed by the organization

2115

MWh fuel consumed for self-generation of electricity

0

MWh fuel consumed for self-generation of heat

2115

MWh fuel consumed for self-generation of steam

<Not Applicable>

MWh fuel consumed for self-generation of cooling

<Not Applicable>

MWh fuel consumed for self-cogeneration or self-trigeneration

<Not Applicable>

Emission factor

1.489

Unit

kg CO2e per m3

Emissions factor source

IPCC AR5 adjusted by the national emission factors released by the state.

Comment

C8.2e

(C8.2e) Provide details on the electricity, heat, steam, and/or cooling amounts that were accounted for at a zero emission factor in the market-based Scope 2 figure reported in C6.3.

Sourcing method

Other, please specify (Off-grid energy consumption from an on-site installation or through a direct line to an off-site generator owned by another company)

Low-carbon technology type

Solar

Country/region of consumption of low-carbon electricity, heat, steam or cooling

Europe

MWh consumed accounted for at a zero emission factor

2100

Comment

C9. Additional metrics

C9.1

(C9.1) Provide any additional climate-related metrics relevant to your business.

C10. Verification

C10.1

(C10.1) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	Third-party verification or assurance process in place
Scope 3	Third-party verification or assurance process in place

C10.1a

(C10.1a) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.

Verification or assurance cycle in place

Annual process

Status in the current reporting year

Complete

Type of verification or assurance

Limited assurance

Attach the statement

Türk Telekom CDP Assurance Statement_26.08_EY_signed.pdf

Page/ section reference

Entire document

Relevant standard

ISAE3000

Proportion of reported emissions verified (%)

100

C10.1b

(C10.1b) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.

Scope 2 approach

Scope 2 location-based

Verification or assurance cycle in place

Annual process

Status in the current reporting year

Complete

Type of verification or assurance

Limited assurance

Attach the statement

Türk Telekom CDP Assurance Statement_26.08_EY_signed.pdf

Page/ section reference

Entire document

Relevant standard

ISAE3000

Proportion of reported emissions verified (%)

100

C10.1c

(C10.1c) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.

Scope 3 category

Scope 3: Business travel

Verification or assurance cycle in place

Annual process

Status in the current reporting year

Complete

Type of verification or assurance

Limited assurance

Attach the statement

Türk Telekom CDP Assurance Statement_26.08_EY_signed.pdf

Page/section reference

Entire document

Relevant standard

ISAE3000

Proportion of reported emissions verified (%)

100

Scope 3 category

Scope 3: Employee commuting

Verification or assurance cycle in place

Annual process

Status in the current reporting year

Complete

Type of verification or assurance

Please select

Attach the statement

Türk Telekom CDP Assurance Statement_26.08_EY_signed.pdf

Page/section reference

Entire document

Relevant standard

ISAE3000

Proportion of reported emissions verified (%)

100

C10.2

(C10.2) Do you verify any climate-related information reported in your CDP disclosure other than the emissions figures reported in C6.1, C6.3, and C6.5?

No, but we are actively considering verifying within the next two years

C11. Carbon pricing

C11.1

(C11.1) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?

No, and we do not anticipate being regulated in the next three years

C11.2

(C11.2) Has your organization originated or purchased any project-based carbon credits within the reporting period?

No

C11.3

(C11.3) Does your organization use an internal price on carbon?

No, and we do not currently anticipate doing so in the next two years

C12. Engagement

C12.1

(C12.1) Do you engage with your value chain on climate-related issues?

Yes, our customers

C12.1b

(C12.1b) Give details of your climate-related engagement strategy with your customers.

Type of engagement

Collaboration & innovation

Details of engagement

Other, please specify (Transition to E-Invoice)

% of customers by number

75

% of customer - related Scope 3 emissions as reported in C6.5

Portfolio coverage (total or outstanding)

<Not Applicable>

Please explain the rationale for selecting this group of customers and scope of engagement

It is hypothetically considered that as we are running public campaigns in terms of e-invoice, which significantly reduce paper consumption and hence has a limited impact on our Scope 3 emissions. We are working towards increasing the number of customers who use e-invoice services. To this end we are taking initiative to help customers understand the direction this application is evolving, and we are organising campaigns to boost the number of customers transitioning to e-invoice. In addition, we have implemented a requirement of e-invoice membership to our "Sil Süpür" campaign in the mobile segment.

Impact of engagement, including measures of success

We have issued around 70 million paper invoices whereas the number of e-invoices steeped to nearly 220 million. More than 3/4 of the invoices are now electronic. These efforts have saved; • 66 thousand trees, • 16 million kWh energy • 125 thousand m3 water in 2019.

Type of engagement

Collaboration & innovation

Details of engagement

Other, please specify (Transition to Digital Documentation)

% of customers by number

% of customer - related Scope 3 emissions as reported in C6.5

Portfolio coverage (total or outstanding)

<Not Applicable>

Please explain the rationale for selecting this group of customers and scope of engagement

In 2019, we have started the transition from hard copy documentation to digital documentation. In our branches, we started using tablets and biometric pens when we collect legal information from our customers rather than collecting it on paper.

Impact of engagement, including measures of success

This way: • We have made the legal paperwork process easier and more efficient. Which allowed branches to focus on customer satisfaction. • We have reduced the paper use and emissions emerging from cargo and courier logistics/transportation.

C12.3

(C12.3) Do you engage in activities that could either directly or indirectly influence public policy on climate-related issues through any of the following?

Other

C12.3e

(C12.3e) Provide details of the other engagement activities that you undertake.

By being member of different multi-stakeholder initiatives, we are working towards lobbying the policy makers about climate change-related issues, especially, the enabling dimension of ICT sector. We became a member of Global e-Sustainability Initiative (GeSI) again after leaving our long time membership in the past years. By this engagement we have a chance to follow the recent developments regarding the low carbon economy and we position the company aligned with these developments. This give us a chance to lobby the policy-makers with a strong background in enabling effect of ICT. In fact, Türk Telekom is the first Turkish company at GeSI. We were also taking part at Energy Efficiency Working Group operating under GeSI. Türk Telekom is also the first telecom operator to be elected to the Board of Directors of the Eurogia+ Cluster operating under the European Union's EUREKA R&D Program. Through this membership, Türk Telekom aims to have a voice in the formulation and development of European energy efficiency and low carbon technologies. We have also been a member of Sürdürülebilir Kalkınma Derneği (SKD - WBCSD Turkey Branch), and actively participating the the working groups such as Women Employment and Equal Opportunities, Sustainable Agriculture and Access to Food, Energy, Decent Works, Sustainable Consumption and Sustainable Finance and Innovation. This also gives us the opportunity to see the bigger picture related to sustainable society and hence we can understand the interconnections among these issues through the lens of climate change and low carbon society. Our presence in Energy Working Group is particularly important for combating climate change and creating new solutions towards a low-carbon economy. In addition, we have joined UN Global Compact to support human rights, working conditions, environment and corruption alications of UNGC and incorporated their 10 principles. We are working towards aligning our strategy and operations voluntarily. We will publish a progress report on how those 10 principles are being incorporated and utilized.

C12.3f

(C12.3f) What processes do you have in place to ensure that all of your direct and indirect activities that influence policy are consistent with your overall climate change strategy?

We have published a policy on combating climate change internally, and our approach to the climate-related issues are disclosed there. In the light of this policy, we are also working towards a low-carbon society, with our products and services offered. We have also been taking part of CDP since 2010 (with a break between 2013-2016) and disclosing our performance with investors.

C12.4

(C12.4) Have you published information about your organization's response to climate change and GHG emissions performance for this reporting year in places other than in your CDP response? If so, please attach the publication(s).

Publication

In mainstream reports

Status

Complete

Attach the document

2019-faaliyet-raporu.pdf

Page/Section reference

48, 151, 153, 155

Content elements

Governance

Other metrics

Comment

C15. Signoff

C-FI

(C-FI) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

C15.1

(C15.1) Provide details for the person that has signed off (approved) your CDP climate change response.

	Job title	Corresponding job category
Row 1	HSE and Environment Manager	Environmental, health and safety manager

Submit your response

In which language are you submitting your response?

English

Please confirm how your response should be handled by CDP

	I am submitting to	Public or Non-Public Submission
I am submitting my response	Investors	Non-public

Please confirm below

I have read and accept the applicable Terms