

PRINCIPLES OF SUSTAINABILITY COMPLIANCE STATEMENT

As an industry pioneer, Türk Prysmian Kablo began its sustainability journey about 4 years ago. A Sustainability Report with stakeholder input was released in 2022 and 2023, marking the culmination of Türk Prysmian Kablo's four-years effort; by adhering to and following good practices in this area, including those specified in The Capital Markets Board's Sustainability Principles Compliance Framework, the company continues to work in line with its commitment to sustainability. Although Türk Prysmian Kablo has implemented a majority of the sustainability principles outlined in the Sustainability Principles Compliance Framework, it continues to work on the items that have not yet been fully implemented.

The principles included in the CMB's Sustainability Principles Compliance Framework are cited in the Sustainability Section of the Annual Report; on Türk Prysmian Kablo and Prysmian Group Website, as well as in the 2022 Sustainability Report.

- Under principle number B.9, Scope 1 and Scope 2 greenhouse gas emissions are calculated using international standards determined by Prysmian Group.

Scope 1 and Scope 2 emissions are presented in the Sustainability Report, but Scope 3 emissions are referenced in the Prysmian Group sustainability report. Currently, special studies are being conducted for Türk Prysmian Kablo.

- Under principle number B.14; Türk Prysmian Kablo has conducted a life cycle analysis of a product, but the Prysmian Group is coordinating the comprehensive study. Third-party (e.g. suppliers, subcontractors, dealers, etc.) greenhouse gas reduction efforts are managed by the Prysmian Group, while Türk Prysmian Kablo is also conducting company-specific studies.

- B.19 renewable energy production and use studies continue. Currently not available for 2023, but included in work plans for 2024.

- Under the principle numbered B.23; No internal carbon pricing studies have yet been conducted.
. There are no accumulated/purchased carbon credits.

- Under the principle numbered B.24; No internal carbon pricing studies have yet been conducted. Studies for the transition to a low-carbon economy continue under the leadership of both the Prysmian Group and the region we are affiliated with.

As part of our annual report, we have attached the Sustainability Principles Report prepared in accordance with the CMB's decision dated 23.06.2022, number 34/977, and approved by the Board of Directors.

	<p><i>When determining compliance with the principles as "Yes" or "Partial", include information/links regarding information disclosed to the public must be shared.</i></p> <p><i>Explicit explanations of compliance with the principles shall be provided in the "Explanation" column.</i></p> <p><i>A note should be included in the "Explanation" column detailing whether the information is presented consolidated or solo.</i></p>	COMPLIANCE STATUS				EXPLANATION	Information about the report (including the page number)/links to publicly disclosed information should be included
		YES	NO	PARTIAL	NOT APPLICABLE		
	A. General Principles						
	A1. Strategy, Policies, and Targets						
A1.1	The Board of Directors of the partnership determines material environmental, social, and corporate governance (ESG) risks and opportunities and creates ESG policies accordingly.	X				We are continuing to work on the Sustainability report for 2023. Risk analyses have been conducted both in Turkey and as a group.	Sustainability Report Prysmian Group – 58. Page Detailed information about the "Sustainability" section of the Annual Report is provided in the Risk Management section.
	The partnership's Board of Directors has developed and publicly disclosed the ESG policies (e.g., Environmental Policy, Energy Policy, Human Rights Policy, etc.)	X				The ESG policies are included both in the Turkey Sustainability report and on our website.	Our Policies (prysmiangroup.com)
A1.2	The public is informed about short- and long-term ESG targets.	X					Sürdürülebilirlik (prysmiangroup.com) – 15-16. Pages Prysmian Group Targets can also be found in the Prysmian Group sustainability report.
	A2. Implementation/Monitoring						
A2.1	Committees and/or units involved in the implementation of ESG policies and highest-ranking officials in the partnership handling the ESG issues and their duties have been identified and disclosed.	X					Detailed information about ESG organization can be found in the annual report under the sustainability section. Sürdürülebilirlik (prysmiangroup.com) – pages 25-26-27
	A report on activities within the scope of policies is submitted at least once a year to the Board of Directors by the responsible committee and/or unit.	X					Sürdürülebilirlik (prysmiangroup.com) – Explained on Page 27.

A2.2	Action plans and execution plans aligned with the ESG targets were developed and disclosed.	X				Sürdürülebilirlik (prysmiangroup.com) – A full explanation of all projects can be found on pages 37 through 72.
A2.3	ESG Key Performance Indicators (KPIs) and the level of attainment of these indicators on a yearly basis were disclosed.	X				Sürdürülebilirlik (prysmiangroup.com) – page 34-35 _ 2023 targets are being monitored regularly. Detailed information can be found in the annual report's "sustainability" section.
A2.4	The public has been informed of activities aimed at improving the sustainability performance of business processes or products and services.	X				Prysmian Group Ecovadis regularly shares performance results based on evaluation criteria such as CDP. Sürdürülebilirlik (prysmiangroup.com) – pages 37 to 72
A3. Reporting						
A3.1	A clear, accurate, and adequate presentation of the partnership's sustainability performance, targets, and actions is provided in the annual report.	X			Every page of our 2022 report explains our performance and goals clearly and concisely.	Detailed information can be found in the annual report's "sustainability" section. Sürdürülebilirlik (prysmiangroup.com)
A3.2	The partnership has disclosed information about its activities related to the United Nations (UN) 2030 Sustainable Development Goals.	X				Sürdürülebilirlik (prysmiangroup.com) – Refer to Page 38.
A3.3	Lawsuits filed and/or resolved against ESG issues that are significant in relation to ESG policies and/or have a significant impact on operations have been disclosed.		X			No lawsuit has been filed against our company in relation to this matter.
A4. Verification						
A4.1	ESG Key Performance metrics have been verified by an independent third party and made public.	X				Prysmian Group performs the verification.
B. Environmental Principles						
B1	Partnership environmental policies and practices, action plans, environmental management systems (known as ISO 14001 standards) and programs have been made public.	X				It is described in detail in the annual report Sürdürülebilirlik (prysmiangroup.com) – 38-39 Page
B2	In regards to the report issued to inform the public about environmental issues	X				Sürdürülebilirlik (prysmiangroup.com) – refer to page 5

	management, the scope, period, and date of the report, as well as limitations regarding the reporting conditions are disclosed.						
B3	Explained in A2.1						
B4	The public has been provided with information on environmental targets that are included in the reward criteria of performance incentive systems offered to stakeholders (such as employees, managers, and board members).	X				Prysmian Group has incorporated CSY into its performance incentive criteria and reward system.	Details on the reward system can be found in the Sustainability: report and responsibility Prysmian Group .
B5	Public disclosure has been made about how environmental issues of priority are integrated into business targets and strategies.	X					Sürdürülebilirlik (prysmiangroup.com) – page 29 lists the materiality. Pages 44 to 47 explain the integration process.
B7	How environmental issues are managed across the partner value chain, including customers and vendors, and are integrated into business objectives and strategies, including the operational process, have been disclosed.	X					Sürdürülebilirlik (prysmiangroup.com) – page 29 explains relations with stakeholders.
B8	Public disclosed have been made about the partnership involvement in the policy-making processes of relevant organizations and non-governmental organizations in the environmental field, as well as collaborations with these institutions and organizations.	X					Sürdürülebilirlik (prysmiangroup.com) – page 29 explains relations with stakeholders.
B9	Information on environmental impacts has been publicly disclosed on a comparative basis, in the light of environmental indicators (Greenhouse gas emissions (Scope-1 (Direct), Scope-2 (Energy indirect), Scope-3 (Other indirect), air quality, energy management, water and wastewater management, waste management, biodiversity impacts)	X					Sürdürülebilirlik (prysmiangroup.com) – Scope 1 and 2 _ is presented in our report. Sustainability Report Prysmian Group Scope 3 is presented in the report issued by our Group. It is also presented in the annual report.
B10	Details of the standard, protocol, methodology, and base year used to collect and calculate data have been disclosed.	X					The standard is specified in the Prysmian Group Report. Detailed information can be found in the annual report "sustainability" section.

B11	The status (increase or decrease) of environmental indicators for the reporting year is disclosed comparatively with previous years.	x					Sürdürülebilirlik (prysmiangroup.com) presented in the attachments section.
B12	A set of short and long-term targets have been determined to reduce environmental impacts, and these targets and the progress made in the reporting year are explained in relation to the previously defined targets.	x					Sürdürülebilirlik (prysmiangroup.com) presented between pages 36 and 43.
B13	A strategy and actions to combat the climate crisis have been developed and disclosed.	x					Sürdürülebilirlik (prysmiangroup.com) presented on page 38. Also, detailed information can be found in the annual report "sustainability" section.
B14	The programs or procedures have been established to prevent or minimize the potential adverse impact of the products and/or services on the environment and have been disclosed.	x					Sürdürülebilirlik (prysmiangroup.com) presented on page 51.
B14 B15	Actions have been taken and disclosed to reduce third parties' (eg suppliers, subcontractors, dealers, etc.) greenhouse gas emissions.	x					Sürdürülebilirlik (prysmiangroup.com) presented on page 42 and 43. Also detailed information can be found in the annual report "sustainability" section.
	The environmental benefits/gains and cost savings provided by initiatives and projects carried out to reduce the environmental impacts have been disclosed.	x					Sürdürülebilirlik (prysmiangroup.com) presented on pages 38-43.
B16	Total energy consumption data (natural gas, diesel, gasoline, LPG, coal, electricity, heating, cooling, etc.) are presented in the report as Scope-1 and Scope-2.	x					Sürdürülebilirlik (prysmiangroup.com) presented in the attachments section.
B17	Information on the data pertaining to the electricity, heat, steam, and cooling produced in the reporting year has been provided.	x					Sürdürülebilirlik (prysmiangroup.com) presented in the attachments section.

B18	Studies on increasing the use of renewable energy and transition to zero or low-carbon electricity have been conducted and publicly announced.	x				Sürdürülebilirlik (prysmiangroup.com) presented on page 46.
B19	Data on renewable energy production and use have been disclosed.		x			No disclosure has been made in this regard.
B20	Energy efficiency projects have been carried out and the amount of energy consumption and emission reduction achieved through these projects has been disclosed.					Sürdürülebilirlik (prysmiangroup.com) presented on page 40, 41, and 48.
B21	The amount of water drawn from underground or above ground, used, recycled, and discharged as well as its sources and procedures have been disclosed.	x				Sürdürülebilirlik (prysmiangroup.com) presented in the attachments section.
B22	Whether operations or activities are included in any carbon pricing system (Emissions Trading System, Cap & Trade or Carbon Tax) has been disclosed.		x			No disclosure has been made in this regard.
B23	Information and details of carbon credits accumulated or purchased during the reporting period have been disclosed.		x			No disclosure has been made in this regard.
B24	In the event that carbon pricing is applied within the partnership, the details of its application have been disclosed.		x			No disclosure has been made in this regard.
B25	The platforms where environmental information is provided have been disclosed.	x				Presented in the sustainability report.
C. Social Principles						
C1. Human Rights and Employee Rights						
C1.1	The Corporate Human Rights and Employee Rights Policy is developed that ensures compliance with the Universal Declaration of Human Rights, the International Labor Organization Conventions ratified by Turkey, as well as the Turkish legal framework governing human rights and working conditions. Roles and responsibilities related to the said policy and its implementation have been disclosed.	x				Sürdürülebilirlik (prysmiangroup.com) presented on page 13.

C1.2	A fair workforce, improved labor standards, and women's employment and inclusion issues that consider supply chain and value chain effects (including nondiscrimination against women, men, races, religions, languages, marital status, ethnic origin, sexual orientation, gender identity, domestic responsibilities, union participation, political views, disabilities, cultural differences, etc.) have been addressed in the employee rights policy.	x					Sürdürülebilirlik (prysmiangroup.com) presented on page 62.
C1.3	Measures taken along the value chain to protect the rights of certain groups vulnerable to specific economic, environmental, and social factors (low-income groups, women, etc.) or minority rights/equal opportunities have been disclosed.	x					Sürdürülebilirlik (prysmiangroup.com) presented on page 62.
C1.4	Progress made in preventing discrimination, inequality, human rights violations, forced labor, and preventive corrective practices have been disclosed.	x					Sürdürülebilirlik (prysmiangroup.com) presented on page 62.
C1.5	Investments made in employees (training, development policies), compensation, fringe benefits, the right to establish unions, solutions regarding work-life balance, and talent management issues have been addressed in the employee rights policy.	x					Sürdürülebilirlik (prysmiangroup.com) presented on page 62.
C1.5	Mechanisms for employee complaints and the resolution of disputes have been established and dispute resolution processes have been developed.	x					Sürdürülebilirlik (prysmiangroup.com) presented on page 63.
C1.6	The activities undertaken during the reporting period to ensure employee satisfaction are disclosed.	x					Sürdürülebilirlik (prysmiangroup.com) presented on page 63.
	Occupational health and safety policies are developed and disclosed.	x					Sürdürülebilirlik (prysmiangroup.com) presented on page 70.
C1.6 C1.7	Measures taken to protect employee health and prevent occupational accidents, and accident	x					Sürdürülebilirlik (prysmiangroup.com) presented on page 70.

	statistics have been disclosed.					
	Policies for the protection of personal data and data security have been developed and disclosed.	x				Sürdürülebilirlik (prysmiangroup.com) presented on page 28. Furthermore it is available on the web site Gizlilik Politikası (prysmiangroup.com) .
C1.8	The ethics policy has been developed and disclosed.	x				Sürdürülebilirlik (prysmiangroup.com) presented on page 13.
C1.9	Studies conducted regarding social investment, social responsibility, financial inclusion, and access to financing have been disclosed.					Sürdürülebilirlik (prysmiangroup.com) presented on pages 66-67
C1.10	Informative meetings and training programs regarding ESG policies and practices have been organized for employees.					Sürdürülebilirlik (prysmiangroup.com) presented on page 62
	C2. Stakeholders, International Standards and Initiatives					
C2.1	A customer satisfaction policy for managing and resolving customer complaints has been created and disclosed.	x				Sürdürülebilirlik (prysmiangroup.com) presented on page 28. It is also available on our website. turk-prysmian-iso-10002-2014-unacc.pdf (prysmiangroup.com)
C2.2	Information on communication with stakeholders (the concerned stakeholder, agenda, and frequency) is disclosed.	x				Sürdürülebilirlik (prysmiangroup.com) presented on page 29.
C2.3	The international reporting standards adopted have been disclosed.	x				The information is included in the Report Overview section.
C2.4	International organizations, committees on sustainability, of which the company is a member or signatory, and the principles adopted by the company have been disclosed.	x				Sürdürülebilirlik (prysmiangroup.com) presented in the attachments section.
C2.5	A concrete effort has been made to be incorporated into the Borsa Istanbul Sustainability Index as well as international sustainability indices.	x				Presented on page 38 of Prysmian Group Sustainability Report. DNF ENG 2021 15.03.2022 2.pdf (prysmiangroup.com)
	D. Corporate Governance Principles					

D1	Various stakeholders were consulted as part of the development of measures and strategies related to sustainability.	x					Sürdürülebilirlik (prysmiangroup.com) presented on page 30.
D2	Through social responsibility projects, awareness events, and training, efforts are made to raise awareness about sustainability.	x					Sürdürülebilirlik (prysmiangroup.com) presented on page 67.