

## Welcome to your CDP Water Security Questionnaire 2021

### W0. Introduction

#### W0.1

##### **(W0.1) Give a general description of and introduction to your organization.**

Akçansa, a JV of Sabancı Holding and HeidelbergCement, is the leader of Turkish Cement industry. Operating in the Marmara, Aegean, and Black Sea regions, Akçansa produces cement and clinker in its three facilities located in Istanbul-Büyükdere, Çanakkale, and Samsun-Ladik. Company also has total seven cement terminals located in Istanbul-Ambarlı, İzmir-Aliağa, Yalova, Yarımca, Hopa, Derince, and Marmara Ereğlisi. as well as ready-mixed concrete operations under “Betonsa” brand at 25 Facilities and aggregates operations under “Agregasa” brand in 1 Facility.

Akçansa aims to be “the highest quality in production and service” in order to meet the demands of both its domestic and international customers and to compete beyond the price.

Akçansa, the leader of the Turkish cement industry, meets 10% of Turkey’s cement need as well as 16% of Turkey’s total cement and clinker export with its products complying to the global quality standards, its eco-friendly identity awarded by the Istanbul Chamber of Industry, its outstanding service understanding, and its plants equipped with high technology.

Akçansa’s vision statement “Sustainable growth beyond all limits” reflects Company’s sustainability strategy which is in line with Company’s business strategy. The sustainability journey dates back to 2009 when Sustainability Committee was established, and 2020 Sustainability Ambitions were set. The sustainability vision is maintained by the Company’s mission as well which is “to be a leading building materials company” enhancing the quality of life of the society by means of our culture committed to environmental, legal and ethical principles.

Our climate change strategy mainly focuses on reduction of CO2 emissions through maximizing alternative fuels and biomass, decreasing rate of clinker in cement and increasing energy efficiency. Akçansa adopts a sustainability management approach as the main element of its corporate vision, covering all business processes from raw material production to after-sales services to end-users. We are participatory of the UN Global Compact, UN Women’s Empowerment Principles, CDP Climate Change/Water programs and a member of WBCSD Turkey.

In 2018, sustainability management has been reorganised and Akçansa 2030 sustainability targets are set in 2020. In the new sustainability management structure, Sustainability Working Committee (SWC) takes the key position to set corporate targets and to develop and implement projects. Being chaired by Deputy General Manager (DGM) of Operations Function who directly reports to General Manager (GM), it is composed of 6 pillars managed by relevant corporate managerial positions. Committee Members build Working Groups (WGs) or Task Forces (TFs) to develop and implement projects to maintain sustainability targets. SWC reports to Sustainability Steering Committee (SSC) which consists of Akçansa Executive Committee Members (GM and DGMs). Its main mission is to approve and follow up sustainability targets & relevant projects. And finally, SSC reports to Akçansa Board of Directors which is responsible of defining sustainability vision and strategy. In Board, Chairman is representing Sabancı Holding and Vice President is representing HeidelbergCement. Akçansa GM shares key sustainability KPIs and relevant ongoing projects to Board regularly. From setting up of sustainability strategy to follow up targets and approval of investment budgets, SSC and Board of Directors directly own the whole process. The climate-related targets (alternative fuel rate and energy efficiency KPIs) are defined by Deputy GM-Operations, Facility Managers and Raw Materials & Environmental Manager (RMEM), both are direct reports of Deputy GM-Operations. RMEM is Head of “Reducing Environmental Footprint” pillar in SWC. He is supported by direct reports (environmental engineers at Facilities responsible of 14001 EMS management, compliance to regulations, CO2 emissions follow-up/calculations/reporting). Climate-related targets are reviewed and approved by SSC. Targets are extended to relevant employee at 3 Facilities through annual personal performance targets. Alternative Fuels & Energy Manager and his team, responsible of sourcing alternative fuels to Facilities, also have annual performance targets on alternative fuel supply rate and cost. CO2 emissions (total of 3 Facilities) are reported to HeidelbergCement annually. CO2 calculations are based on “WBCSD Cement Sustainability Initiative Cement CO2 and Energy Protocol, Version 3.1 CO2 Emissions and Energy Inventory”.

## W0.2

**(W0.2) State the start and end date of the year for which you are reporting data.**

	Start date	End date
Reporting year	January 1, 2020	December 31, 2020

## W0.3

**(W0.3) Select the countries/areas for which you will be supplying data.**

Turkey

## W0.4

**(W0.4) Select the currency used for all financial information disclosed throughout your response.**

TRY

## W0.5

**(W0.5) Select the option that best describes the reporting boundary for companies, entities, or groups for which water impacts on your business are being reported.**

Companies, entities or groups over which operational control is exercised

## W0.6

**(W0.6) Within this boundary, are there any geographies, facilities, water aspects, or other exclusions from your disclosure?**

Yes

### W0.6a

**(W0.6a) Please report the exclusions.**

Exclusion	Please explain
Head office	Akcansa takes care of water footprint in the head office and the consumption is negligible in amount therefore it is not included in our disclosure.
Guest houses	Akcansa takes care of water footprint in the head office and the consumption is negligible in amount therefore it is not included in our disclosure.

## W1. Current state

### W1.1

**(W1.1) Rate the importance (current and future) of water quality and water quantity to the success of your business.**

	Direct use importance rating	Indirect use importance rating	Please explain
Sufficient amounts of good quality freshwater available for use	Vital	Not very important	<p>Direct use: Water is an indispensable source needed for the continuity of our production activities (open and close circuit cooling, dedusting of the facilities and as a constituent of our ready-mix concrete products) and maintaining the sufficient WASH services provision for our employees. Especially in our close circuit cooling processes we need the water to be at a certain quality, and lower quality of water will adversely affect our process efficiency. Therefore, we consider having sufficient amounts of good quality fresh water as vital to our operations, especially for close circuit cooling operation. We expect the importance level to stay as vital in the future too.</p> <p>Indirect: Our upstream and downstream value chain will need sufficient amounts of water to continue their operations. We estimate the level of importance to be not very important for indirect use of water in our value chain. We expect the level of importance to increase as the climate projections indicate water scarcity over the long-term for Turkey.</p>
Sufficient amounts of recycled, brackish and/or produced water available for use	Not very important	Not very important	<p>Direct: as part of our operations we recycle water at our close circuit cooling system and the treated wastewater and run off water is recycled/reused in cleaning and spraying for dedusting. It is important for us to maximize the water recycle rate, but this source is currently not of great importance for our direct operations. As the sufficient amount of fresh water is expected to decrease in line with long-term climate projections, we expect the importance rating for sufficient amounts of recycled and brackish water to increase in the future.</p> <p>Indirect: In line with our value chain's need for sufficient amounts of fresh water, the current importance rating for sufficient amounts of recycled, brackish and/or produced water as not</p>

			very important. We expect the importance rating for this source to increase over the mid to long-term.
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## W1.2

**(W1.2) Across all your operations, what proportion of the following water aspects are regularly measured and monitored?**

	% of sites/facilities/operations	Please explain
Water withdrawals – total volumes	100%	In all 3 Cement Plants, 21 Ready-Mix plants, 1 aggregate plant, 3 ports and Terminals, we regularly measure, monitor and report water withdrawals by total volumes. To implement water management measures and to meet stakeholders' expectations, Water data should be credible, relevant and easy to understand. This requires the consistent use of metrics, terminology and definitions. Therefore, we regularly measure and monitor total water withdrawals, track water footprint on a monthly basis, evaluate water consumptions with respect to production volumes.
Water withdrawals – volumes by source	100%	In all 3 Cement Plants, 21 Ready-Mix plants, 1 aggregate plant, 3 ports and Terminals, we regularly measure, monitor and report water withdrawals by source. To implement water management measures and to meet stakeholders' expectations, Water data should be credible, relevant and easy to understand. This requires the consistent use of metrics, terminology and definitions. Therefore, we regularly measure and monitor total water withdrawals, track water footprint on monthly basis, evaluate water consumptions with respect to production volumes.
Water withdrawals quality	Not monitored	In 2020, we did not monitor the quality of water withdrawal since the source are the same. However, in the future, we plan to conduct periodic monitoring of this water aspect.
Water discharges – total volumes	100%	In all 3 Cement plants we regularly measure, monitor and report water discharges by total volumes. In our plants Industrial and Domestic wastewater treatment units those are discharging to receiving environment are all permitted. The discharge volumes are accepted as defined in the permits.

		<p>Total volumes are calculated by adding up all discharges. Since the Ports and Aggregates domestic usages are negligible in amount domestic water withdrawals are accepted as domestic discharge. For RMC plants domestic withdrawals are negligible and production wastewater is recycled to be used again in product, Volumes are accepted as fully consumed. Additionally, according to the Turkish regulation, discharges from domestic usage is not required to be treated and monitored when the line is discharging to public infrastructure. And also According to CSI water reporting guideline, domestic waste water discharges are not considered to be able to make an industrial benchmark.</p>
Water discharges – volumes by destination	100%	<p>In all 3 Cement plants we regularly measure, monitor and report water discharges by total volumes. In our plants Industrial and Domestic wastewater treatment units those are discharging to receiving environment are all permitted. The discharge volumes are accepted as defined in the permits. Total volumes are calculated by adding up all discharges. Since the Ports and Aggregates domestic usages are negligible in amount domestic water withdrawals are accepted as domestic discharge. For RMC plants domestic withdrawals are negligible and production wastewater is recycled to be used again in product, Volumes are accepted as fully consumed. Additionally, according to the Turkish regulation, discharges from domestic usage is not required to be treated and monitored when the line is discharging to public infrastructure. And also According to CSI water reporting guideline, domestic waste water discharges are not considered to be able to make an industrial benchmark.</p>
Water discharges – volumes by treatment method	100%	<p>In all 3 plants we regularly measure, monitor and report water discharges by total volumes. In our plants Industrial and Domestic wastewater treatment units those are discharging to receiving environment are all permitted. The discharge volumes are accepted as defined in the permits. Total volumes are calculated by adding up all discharges. Since the Ports and Aggregates domestic usages are negligible in amount domestic water withdrawals are accepted as domestic discharge. For RMC plants domestic withdrawals are negligible and production wastewater is recycled to be used again in product, Volumes are accepted as fully consumed. Additionally, according to the Turkish regulation, discharges from domestic usage is not required to be treated and monitored when the line is discharging to public</p>

		infrastructure. And also According to CSI water reporting guideline, domestic waste water discharges are not considered to be able to make an industrial benchmark.
Water discharge quality – by standard effluent parameters	100%	Quality by standard effluent parameters are measured regularly according to regulation where the wastewater treatment units in place. At all wastewater discharge points, measurements are conducted every 2 months and at the other two points, every 4 months.
Water discharge quality – temperature	Not relevant	Also There is no process to increase discharge wastewaters temperature. In Cement bussiness line all water are used in closed recycling circuit and are not discharged.
Water consumption – total volume	100%	According to CSI Water protocol and guideline, the water consumption is the difference between withdrawal and discharge.
Water recycled/reused	100%	The water harvested and collected in the pools is used partly for cooling and for dedusting, and is monitored 100%.
The provision of fully-functioning, safely managed WASH services to all workers	100%	In all facilities we maintain the provision of fully-functioning, safely managed (complying with all regulatory parameters) WASH services to all our employees for for sanitation and hygiene purposes. We monitor the water use & continuous access to WASH services covering all our operations (100%).

## W1.2b

**(W1.2b) What are the total volumes of water withdrawn, discharged, and consumed across all your operations, and how do these volumes compare to the previous reporting year?**

	Volume (megaliters/year)	Comparison with previous reporting year	Please explain
Total withdrawals	2,152.52	Higher	We are now reporting with all locations. Last year amount: 1,879.67 (megaliters/year) for all 3Cement plants. Total of Cement Plants withdrawal for 2020 is 1,973.47 ML/year. There is 5% increase if we compare Cement plants.

			But in general with all locations, There is approximately 13% increase. We consider changes between 5 to 40% as higher/lower.
Total discharges	244.95	Higher	Last year amount: 194.81 (megaliters/year) for total of 3 Cement plants. All bussiness lines are added to disclosure. Since our Port /Terminal and AGG lines domestic withdrawal are accepted as domestic discharge and RMC domestic withdrawals accepted as consumption. There is increase about 25% in the parallel of higher withdrawal. We consider changes between 5 to 40% as higher/lower.
Total consumption	1,907.57	Higher	Last year's amount: 1,684.86 (megaliters/year) Total consumption is increased as 13.2%. We consider changes between 5 to 40% as higher/lower.

## W1.2d

(W1.2d) Indicate whether water is withdrawn from areas with water stress and provide the proportion.

	Withdrawals are from areas with water stress	% withdrawn from areas with water stress	Comparison with previous reporting year	Identification tool	Please explain
Row 1	Yes	11-25	About the same	WRI Aqueduct	Büyükçekmece Plant is located at water stressed area. %14 percent of total water consumption. in 2019 this ratio was 16%. We consider % changes below 5% as about the same.

## W1.2h

(W1.2h) Provide total water withdrawal data by source.

	Relevance	Volume (megaliters/year)	Comparison with previous reporting year	Please explain



Fresh surface water, including rainwater, water from wetlands, rivers, and lakes	Relevant	102.42	Higher	Harvested rainwater in BÇM is approx. 80 ML/year, is used for ground dedusting. The change results parting of usage Fresh surface (river) water in 2020 as 22.42 ML/year in LDK plant. Increase is 28%.
Brackish surface water/Seawater	Not relevant			No water withdrawal from Surface Surface or Seawater
Groundwater – renewable	Relevant	1,704	About the same	Last year amount: 1,661.98 (megaliters/year). There is 2% difference. we consider changes below 5% as about the same.
Groundwater – non-renewable	Not relevant			No water withdrawal from non renewable groundwater.
Produced/Entrained water	Not relevant			No water withdrawal from Produced/Entrained water.
Third party sources	Relevant	346.1	Much higher	3rd party sources are including municipal public lines and other companies. Last year amount: 217.69 (megaliters/year) just for BCM plant. This year RMC, Ports/Terminals and Aggregate plants are also included. Thus there is 60% increase. we consider changes above 40% as much higher/lower.

## W1.2i

**(W1.2i) Provide total water discharge data by destination.**

	Relevance	Volume (megaliters/year)	Comparison with previous reporting year	Please explain
Fresh surface water	Not relevant			There is no discharge to Fresh surface water.
Brackish surface water/seawater	Relevant	197.95	Higher	CNK & LDK & Ambarlı Port plants wastewater treatment facility discharges. Other locations Domestic waste water is lined to Local Wastewater Authorities infrastructure (such as İSKİ or City collectors). 2019 amount was 155.95 ML/year for Cement Plants. (CNK and LDK) Ambarlı Port is added, as 12.02. 2020. While CNK and LDK cement plants discharged 185.94 ML/year. For Cement (CNK and LDK) 19% increase. Total approx increase is 27% percent. We consider changes between 5 to 40% as lower/higher.
Groundwater	Not relevant			There is no discharge to Groundwater
Third-party destinations	Relevant	47	Higher	BCM Cement Plant Domestic waste water is lined to Local Wastewater Authority infrastructure (İSKİ). (City collectors). Other locations added for Ports (Aliaga, Yalova) and Aggregate (Saray) Domestic waste water is discharged to Local Wastewater Authorities infrastructure or carried. 2019 value was 38.87 ML/year while in 2020 its 41.36 ML/year together with the other locations discharged as 5.7 ML/year. Change is 8.19 ML which corresponds to 21%.

## W1.2j

(W1.2j) Within your direct operations, indicate the highest level(s) to which you treat your discharge.

	Relevance of treatment level to discharge	Volume (megaliters/year)	Comparison of treated volume with previous reporting year	% of your sites/facilities/operations this volume applies to	Please explain
Tertiary treatment	Not relevant				
Secondary treatment	Relevant	52.26	This is our first year of measurement	1-10	Canakkale (CNK) Seaside plant, Ladik (LDK) plant and Ambarlı Port plant has secondary treatments.
Primary treatment only	Relevant	145.69	This is our first year of measurement	1-10	Canakkale (CNK) main plant has primary treatments that discharges.
Discharge to the natural environment without treatment	Not relevant				
Discharge to a third party without treatment	Relevant	47	This is our first year of measurement	11-20	BCM Cement Plant Domestic wastewater is lined to Local Wastewater Authority infrastructure (İSKİ) (City collectors). Other locations added for Ports (Aliaga, Yalova) and Aggregate (Saray) Domestic wastewater is discharged to Local Wastewater

					Authorities infrastructure or carried.
Other	Not relevant				

## W2. Business impacts

### W2.1

**(W2.1) Has your organization experienced any detrimental water-related impacts?**

No

### W2.2

**(W2.2) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for water-related regulatory violations?**

No

## W3. Procedures

### W3.3

**(W3.3) Does your organization undertake a water-related risk assessment?**

Yes, water-related risks are assessed

### W3.3a

**(W3.3a) Select the options that best describe your procedures for identifying and assessing water-related risks.**

## Direct operations

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### Coverage

Full

### Risk assessment procedure

Water risks are assessed as part of other company-wide risk assessment system

### Frequency of assessment

Annually

### How far into the future are risks considered?

More than 6 years

### Type of tools and methods used

Other

### Tools and methods used

Internal company methods

Other, please specify

Sabancı Holding Compliance Report and HeidelbergCement Risk Management Guide

### Comment

Water-related risks are defined, followed and reported by Plant Managers, Operations Department and Corporate Risk Manager. We assess and manage water-related risks by using Sabancı Holding and HeidelbergCement Risk Management Procedures and Policies as well as ISO 14001 Environmental Management System. The risks are reported to Sabancı Holding on a quarterly basis. The water risk assessment is defined in a procedure in compliance with the Heidelberg Cement Risk Management Guideline. The risks and opportunities are identified and presented to Risk Committee (established to report Corporate Governance Committee). In addition, One of the 6 Pillars constituting Akçansa Sustainability Working Committee is “Reducing Environmental Footprint” at which one of the topics covered is water management. Akçansa has recently established its 2030 Sustainability Targets. In order to manage water-related risks, we set a target with an appropriate KPI as decrease in water withdrawal per cementitious product.

## Supply chain

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### Coverage

Partial

### Risk assessment procedure

Water risks are assessed as part of other company-wide risk assessment system

### Frequency of assessment

Annually

### How far into the future are risks considered?

More than 6 years

### Type of tools and methods used

Enterprise Risk Management

Other

### Tools and methods used

Internal company methods

Other, please specify

Sabancı Holding Compliance Report and HeidelbergCement Risk Management Guide

### Comment

We currently conduct water-related risk assessment of our suppliers only covering our water suppliers. Therefore, the current scope of coverage is partial. We assess and manage water-related risks in our supply chain in accordance with Sabancı Holding and HeidelbergCement Risk Management Procedures and Policies as well as ISO 14001 Environmental Management System.

## Other stages of the value chain

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### Coverage

Partial

**Risk assessment procedure**

Water risks are assessed as part of an enterprise risk management framework

**Frequency of assessment**

Annually

**How far into the future are risks considered?**

More than 6 years

**Type of tools and methods used**

Other

**Tools and methods used**

Internal company methods

Other, please specify

Sabancı Holding Compliance Report and HeidelbergCement Risk Management Guide

**Comment**

Akçansa has a Corporate Risk Assessment Procedure in line with Sabancı Holding and HeidelbergCement Risk Management Procedures and Guidelines. Water-related risks arising across the other stages in the value chain is partially included as we don't have access to reliable input/data to conduct full coverage risk assessment yet.

**W3.3b**

**(W3.3b) Which of the following contextual issues are considered in your organization's water-related risk assessments?**

	Relevance & inclusion	Please explain
Water availability at a basin/catchment level	Relevant, always included	Water is a vital source for our business. Therefore, any risks related to water availability is directly relevant to our company-wide risk assessment process and therefore is always considered. As certain

		amount of water is needed in all 3 stages of our value chain, we consider water availability for all stakeholders as an important contextual issue in terms of both current and emerging issues.
Water quality at a basin/catchment level	Not relevant, explanation provided	Availability of sufficient quantity is significantly more important than the quality aspect of the water. Therefore, this contextual issue does not pose a substantive impact to our business as accordingly is currently not yet included in our water-related risk assessment. However, we continuously evaluate all water related aspects across all 3 stages in our value chain and if we identify an emerging substantive risk, we will include in our risk assessment in the future.
Stakeholder conflicts concerning water resources at a basin/catchment level	Relevant, always included	We operate with full respect to our stakeholders' right to access water. Stakeholder conflict issue covers all 3 stages of our value chain and is always relevant & included in our risk assessment. We currently received no stakeholder complaints or conflict concerning water resources.
Implications of water on your key commodities/raw materials	Relevant, always included	Water is a direct substitute Implications of water on our key commodities and raw materials are determined as a relevant water-related risk issue and is always included in our company-wide risk assessments covering both current & possible emerging issues. Currently, risk assessment regarding this contextual issue only covers our direct operations.
Water-related regulatory frameworks	Relevant, always included	Regardless of the context, regulatory risks are always defined as relevant and therefore always included in our risk assessment covering all stages of our value chain for both current and emerging issues. As part of regulatory requirements, our 3 cement plants have ISO 14001 Environmental Management System in place to effectively manage all environment related issues, including water-related regulatory requirements and risks. Environmental Engineers at each Plants follow up the regulations and report status, any upcoming regulatory revisions, monitors and reports Legal Compliance Report.
Status of ecosystems and habitats	Relevant, always included	As part of our raw material quarry operations, protection of biodiversity and ecosystem balance is of utmost importance to us. Therefore, this contextual issue is defined as relevant and is always included in our risk assessment, covering our direct operations for both current and emerging issues.
Access to fully-functioning, safely managed WASH services for all employees	Relevant, always included	Maintaining access to fully functioning is always deemed relevant to or company-wide risk assessment covering our direct operations. We do not have a current risk within this context, but our risk assessment includes possible emerging issues.



Other contextual issues, please specify	Not relevant, explanation provided	No other contextual issues exist.
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### W3.3c

#### (W3.3c) Which of the following stakeholders are considered in your organization's water-related risk assessments?

	Relevance & inclusion	Please explain
Customers	Relevant, always included	Recognizing customer expectations and feedback on ESG issues are of great importance to us. The latest materiality assessment conducted showed that Customers consider water management as one of the most material topics for Akçansa. All risks preventing us from meeting customer expectations, including water-related risks, are considered relevant and is always included in our risk assessment, covering direct operations for both current & potential future customers. National and local stakeholder meetings are done annually where environmental concerns are discussed.
Employees	Relevant, always included	The latest materiality assessment conducted showed that employees consider water management as the 3rd most material topic for Akçansa. Moreover, as an employer, we are responsible of providing access to fully-functioning WASH services for our employees. Any risks affecting our ability to do so is deemed relevant and is always included in our risk assessment across our direct operations. This assessment covers our current and possible future employees as long as we continue our operations. We give regular annual environmental trainings and toolbox talks to Employees to increase their awareness.
Investors	Relevant, always included	The latest materiality assessment conducted showed that Customers consider water management as one of the most material topics for Akçansa. Moreover, awareness and requirement of ESG disclosure on investors' side is rapidly evolving. Therefore, not meeting with investor expectation in general (including water-related aspects) is considered a risk and is always included in our risk assessment. Currently, our assessment covers our direct operations for both current and future investors.
Local communities	Relevant, always included	One of the 6 main pillars as part of our 2030 sustainability roadmap/targets is "being a good neighbor" and operating in harmony with all our local stakeholders including local communities. Therefore, any issues that

		may pose a risk regarding our local community relations is considered relevant and is always included in our risk assessment covering our direct operations. In order to manage/prevent the risks affecting this stakeholder group, National and local stakeholder meetings are conducted annually where environmental concerns are discussed. So far, we have not experienced such a case, but we evaluate any future risks that may arise.
NGOs	Not considered	The materiality studies performed in year 2019 showed that NGOs consider water management as the 8th key issue for Akçansa. Since it is not deemed a stakeholder group recognizing water-related issues as substantive, our water-related risk assessment does not currently include NGOs.
Other water users at a basin/catchment level	Relevant, always included	One of the 6 main pillars as part of our 2030 sustainability roadmap/targets is “being a good neighbor” and operating in harmony with all our local stakeholders including our neighbours. Therefore, any issues that may pose a risk regarding our local relations is considered relevant and is always included in our risk assessment covering our direct operations. In order to manage/prevent the risks affecting this stakeholder group, National and local stakeholder meetings are conducted annually where environmental concerns are discussed. So far, we have not experienced such a case, but we evaluate any future risks that may arise.
Regulators	Relevant, always included	As Company policy, regulatory conformity is mandatory and therefore any risk that may jeopardize our compliance with regulators’ requirements is always considered relevant for our risk assessment covering all stages of our value chain for both current and future regulators.
River basin management authorities	Relevant, always included	As Company policy, conformity with local/national authority requirements is mandatory and therefore any risk that may jeopardize our compliance with local management authorities’ expectations and requirements is always considered relevant for our risk assessment covering all stages of our value chain for both current and future river basin management authorities.
Statutory special interest groups at a local level	Not relevant, explanation provided	We have not identified any stakeholder groups having special interest at local level other than local communities. Therefore, this stakeholder group does not exist as part of our identified stakeholder groups.
Suppliers	Relevant, sometimes included	The latest materiality assessment conducted showed that suppliers consider water management as the 4rd material topic for Akçansa. All water-related risks arising from our supply chain (in particular our ability to have access to sufficient amounts of water through suppliers), are considered relevant and is always included in our risk assessment, covering direct operations for both current & potential future suppliers.

Water utilities at a local level	Relevant, always included	Water is a vital natural resource for the continuity of our operations. Therefore, all water-related risks arising from water utilities at local level are considered relevant and is always included in our risk assessment, covering direct operations for both current & potential future utilities.
Other stakeholder, please specify	Not relevant, explanation provided	We have not identified any additional stakeholder groups than the ones listed above. Therefore, currently no additional parties that are included in our water-related risk assessment. If such an identification occurs in the future, it will accordingly be included in our assessment.

### W3.3d

#### **(W3.3d) Describe your organization's process for identifying, assessing, and responding to water-related risks within your direct operations and other stages of your value chain.**

Water supply is a critical issue and in cement manufacturing process within the content of ISO 14001:2015 system. Akçansa identifies, assesses and manages climate-related risks as a part of Integrated Management System (IMS) that includes ISO 14001:2015. All environmental risks, especially risks regarding compliance to environmental regulations, are reported to Sabancı Holding through "Compliance Risks Report", a consolidated risk follow-up inventory is updated on a quarterly basis. This procedure directly linked to Sabancı Holding Risk Management Procedure and HeidelbergCement Risk Management System Guidance. The risks from the operation at facilities are managed through ISO 14001:2015 Environmental Management System standards. Each department (operation, environment, finance, legal, sales, etc.) defines and assesses their risks according to the defined thresholds, which are then checked by the Environmental Engineer and Plant Managers. High (Substantive) water-related risks are assessed by Operations Department and Corporate Risk Manager. The action/mitigation plans are evaluated and approved by the Sustainability Steering Committee. In the meantime master plans of plants are developed in every 3-5 years period. These studies have been contributed by Operations Team members including Plant Managers and Plant Executive Team, Corporate managers for Environment, Sustainability, Raw Materials, Maintenance, Project, R&D, Process under leadership of Operations Assistant general Manager (AGM). The Master Plan is a very critical and key component of this assessment. All facts regarding current status, future forecast/expectations (including regulatory changes) and technical needs are evaluated in these Master Plans. Here, the impact of water-related issues on finance and plant's operating strategies are considered. The current Master Plan covers the period of 2020-2030.

We have targets to the decrease water withdrawal from wells. Instead we attempt to use recycled and rain harvested water. we have invested for water collection ponds. The water is reused in the process and in dedusting works. Each cement plant has water reduction targets annually. To achieve the best water management methodology the flow diagrams have been prepared and measuring process via flowmeters has already been completed. Water consumption has been controlled regularly on monthly basis and reported to Executive Committee. Regarding our value-chain, on the other

hand, we do care water management from our quarries which are operated by 3rd party subcontractors. We have water plans, we do protect water resources. And we do report to Local Environmental Offices about our impact while operating. All suppliers should obey our environmental procedures within the content of ISO 14001:2015 which includes measures of water management to mitigate water footprint, protect water resources from contamination.

## W4. Risks and opportunities

### W4.1

**(W4.1) Have you identified any inherent water-related risks with the potential to have a substantive financial or strategic impact on your business?**

Yes, both in direct operations and the rest of our value chain

### W4.1a

**(W4.1a) How does your organization define substantive financial or strategic impact on your business?**

Akçansa manages its risks in line with both Sabancı Holding and Heidelberg Cement risk management procedures/ guidelines, and evaluates corporate level as well as asset level risks under multiple categories, namely; financial, operational (service breakdown/disruption) customer, supplier, employee, reputational and compliance risks. Substantive financial and strategic impacts, which are risks that are scored/classified as critical risks, are defined as effects that pose a risk to undermine the entire business. Corporate level substantive risks are defined;

- Quantitatively as risks above USD 1 mio; TL 7.43 mio (Indicative Exchange Rate announced on 12/31/2020 by the Central Bank of Turkey as 7.4327 USD/TL) on an annual basis
- Qualitatively as risks that are a threat to our core business model and business continuity which are evaluated considering risk categories and calculated by Risk Methodology heatmap.

### W4.1b

**(W4.1b) What is the total number of facilities exposed to water risks with the potential to have a substantive financial or strategic impact on your business, and what proportion of your company-wide facilities does this represent?**

	Total number of facilities exposed to water risk	% company-wide facilities this represents	Comment
Row 1	3	1-25	<p>BCM (Buyukcekmece Cement Plant) The production site is located ±500 meters East from the Buyukcekmece Lake. Water is not directly extracted from the lake but from the 8 wells located on plant site. According to the Falkenmark water scarcity index, Marmara Basin is classified as potential water scarcity area.</p> <p>CNK (Canakkale Cement Plants) Seaside Cement plant is located by the sea &lt;100m. Main plant for Clinker production is near village far away from sea. The region is not in water scarcity area and water withdraw are not billed by Government. In the future there will be a planing to bill all consumptions. This will get financial impact to the plant.</p> <p>LDK (Ladik Cement Plant - SAMSUN) Black sea region. The region is not in water scarcity area and water withdraw are not billed by Government. In the future there will be a planing to bill all consumptions. This wil get financial impact to the plant.</p>

### W4.1c

**(W4.1c) By river basin, what is the number and proportion of facilities exposed to water risks that could have a substantive financial or strategic impact on your business, and what is the potential business impact associated with those facilities?**

#### Country/Area & River basin

Turkey

Other, please specify

Marmara basin

#### Number of facilities exposed to water risk

1

**% company-wide facilities this represents**

1-25

**% company's total global revenue that could be affected**

Less than 1%

**Comment**

Increase of water supply costs will lead to higher operation cost.

Water scarcity may prevent to withdraw water from wells. In this case, 3rd party sources shall be find that can increase operation cost.

---

**Country/Area & River basin**

Turkey

Other, please specify

North Aegean Region

**Number of facilities exposed to water risk**

1

**% company-wide facilities this represents**

Less than 1%

**% company's total global revenue that could be affected**

1-10

**Comment**

Government can apply billing to water withdrawal. That can increase our operating costs at Çanakkale Plant.

**Country/Area & River basin**

Turkey  
Kizilirmak

**Number of facilities exposed to water risk**

1

**% company-wide facilities this represents**

Less than 1%

**% company's total global revenue that could be affected**

Less than 1%

**Comment**

Government can apply billing to water withdrawal. That can increase operation cost at Ladik production plant.

## W4.2

**(W4.2) Provide details of identified risks in your direct operations with the potential to have a substantive financial or strategic impact on your business, and your response to those risks.**

---

**Country/Area & River basin**

Turkey  
Other, please specify  
Marmara Basin

**Type of risk & Primary risk driver**

Physical  
Increased water scarcity

**Primary potential impact**

Increased operating costs

**Company-specific description**

As per the climate projections, water scarcity in Marmara basin over the long-term is considered a substantive risk since our Büyükçekmece Plant is located at this basin. Inability to meet our water demand via existing methods will result in increased operating since we will need to identify additional/alternative water sources at most likely considerably higher costs.

**Timeframe**

4-6 years

**Magnitude of potential impact**

Low

**Likelihood**

Likely

**Are you able to provide a potential financial impact figure?**

Yes, a single figure estimate

**Potential financial impact figure (currency)**

1,658,356

**Potential financial impact figure - minimum (currency)**

**Potential financial impact figure - maximum (currency)**

**Explanation of financial impact**

water scarcity will cause access to adequate amount of water to run the plant and will increase the water cost in the market. Thus this will increase our operational costs.



There is average TL (TRY) cost calculated by BCM cement plant example, 2020 average is TL 5.3.  
Considering the 2020 water withdrawn, total cost is 1,658,356 TL, assumptions has taken as doubling the cost.

**Primary response to risk**

Adopt water efficiency, water reuse, recycling and conservation practices

**Description of response**

In order to mitigate this risk, we have established site-specific targets and identified necessary infrastructure investment measures and promote best practice and awareness on water management via incentives to our employees. Only cost bearing response to this risk is water related CAPEX, however due to covid, no water-related investments were made, therefore for 2020 this figure is 0.

**Cost of response**

0

**Explanation of cost of response**

Only cost bearing response to this risk is water related CAPEX, however due to covid, no water-related investments were made, therefore for 2020 this figure is 0.

**W4.2a**

**(W4.2a) Provide details of risks identified within your value chain (beyond direct operations) with the potential to have a substantive financial or strategic impact on your business, and your response to those risks.**

---

**Country/Area & River basin**

Turkey  
Other, please specify  
Marmara basin

**Stage of value chain**

Supply chain

**Type of risk & Primary risk driver**

Regulatory  
Higher water prices

**Primary potential impact**

Increased operating costs

**Company-specific description**

Similar to our direct operations, our suppliers are also subjected to water risks in terms of having difficulty over the long-term to access sufficient amount of water needed to pursue their operations. While considering this risk, we focus on our water suppliers at Büyükçekmece Plant, currently the only plant subjected to water costs. Difficulty of our water suppliers' ability to pursue their operations will result in disruption to our production at Büyükçekmece Plant.

**Timeframe**

4-6 years

**Magnitude of potential impact**

Low

**Likelihood**

Likely

**Are you able to provide a potential financial impact figure?**

Yes, a single figure estimate

**Potential financial impact figure (currency)**

1,658,356

**Potential financial impact figure - minimum (currency)**

**Potential financial impact figure - maximum (currency)**

### **Explanation of financial impact**

The financial impact assumed to be at least equal to our water-related OPEX at Büyükçekmece Plant in the reporting period where we are currently buying water from 3rd parties.

### **Primary response to risk**

Direct operations

Other, please specify

Finding alternative water resources and purchase from 3rd parties.

### **Description of response**

Our response to managing/mitigating this risk is to minimize our water demand to the best degree possible. In order to do so, we implement water efficiency measures and dedicate a CAPEX to these projects.

### **Cost of response**

0

### **Explanation of cost of response**

Only cost bearing response to this risk is water related CAPEX, however due to covid, no water-related investments were made, therefore for 2020 this figure is 0.

## **W4.3**

**(W4.3) Have you identified any water-related opportunities with the potential to have a substantive financial or strategic impact on your business?**

Yes, we have identified opportunities, and some/all are being realized

## **W4.3a**

**(W4.3a) Provide details of opportunities currently being realized that could have a substantive financial or strategic impact on your business.**

---

**Type of opportunity**

Efficiency

**Primary water-related opportunity**

Cost savings

**Company-specific description & strategy to realize opportunity**

From a point of view, long-term expected increase in water scarcity poses a risk in terms of increasing our operating costs, however, on the other hand, it presents an opportunity over the short-term for Companies who implement water efficiency measures to lower their water withdrawals. The opportunity can be defined as reduced water costs at our facilities. Any type of cost savings enable competitive advantage and better capital allocation and is therefore considered as a substantive opportunity in today's operating environment.

**Estimated timeframe for realization**

1 to 3 years

**Magnitude of potential financial impact**

Low

**Are you able to provide a potential financial impact figure?**

Yes, a single figure estimate

**Potential financial impact figure (currency)**

975,200

**Potential financial impact figure – minimum (currency)**

**Potential financial impact figure – maximum (currency)**

**Explanation of financial impact**

This opportunity will help saving the water related costs.

Total of 5 rainwater collectors, which are to be planned in 2022 kick-off; for BCM and CNK plants with approx. 184.000 m3/year benefit.

2020 Average BCM cost taken into account for calculations.

## W5. Facility-level water accounting

### W5.1

**(W5.1) For each facility referenced in W4.1c, provide coordinates, water accounting data, and a comparison with the previous reporting year.**

---

**Facility reference number**

Facility 1

**Facility name (optional)**

Büyükçekmece Cement Plant

**Country/Area & River basin**

Turkey

Other, please specify

Marmara Basin

**Latitude**

41.0118

**Longitude**

28.3327

**Located in area with water stress**

Yes

**Total water withdrawals at this facility (megaliters/year)**

391.19

**Comparison of total withdrawals with previous reporting year**

Higher

**Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes**

80

**Withdrawals from brackish surface water/seawater**

0

**Withdrawals from groundwater - renewable**

64.14

**Withdrawals from groundwater - non-renewable**

0

**Withdrawals from produced/entrained water**

0

**Withdrawals from third party sources**

247.05

**Total water discharges at this facility (megaliters/year)**

41.36

**Comparison of total discharges with previous reporting year**

Higher

**Discharges to fresh surface water**

0

**Discharges to brackish surface water/seawater**

0

**Discharges to groundwater**

0

**Discharges to third party destinations**

41.36

**Total water consumption at this facility (megaliters/year)**

349.83

**Comparison of total consumption with previous reporting year**

Higher

**Please explain**

For Withdrawal; In 2019, it was 296.74 but however, 80 ML rainwater is not sub totalled in the report. Total is 376.74 ML.

2020 amount is 391.19, There is approx. 5% increase.

Rainwater collectors 80 ML/year, that is the water captured to be used for de-dusting of roads. This amount calculated by tours of street sprinklers considering the vehicle capacity and tour counts.

Regardless of rainwater captured (80ML) Total water consumption for BCM plant 269.8 ML for 2020. While 2019 total water consumption is 257.87 ML. Higher 4,5% then previous year.

Alternative Fuel usage increase of the plant, results in an increase in the gas temperature, thus water demand for cooling purposes increases.

---

**Facility reference number**

Facility 2

**Facility name (optional)**

Çanakkale Cement Plant

**Country/Area & River basin**

Turkey  
Other, please specify  
North Aegean

**Latitude**

39.5156

**Longitude**

26.1439

**Located in area with water stress**

No

**Total water withdrawals at this facility (megaliters/year)**

1,607.93

**Comparison of total withdrawals with previous reporting year**

Higher

**Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes**

0

**Withdrawals from brackish surface water/seawater**

0

**Withdrawals from groundwater - renewable**

1,607.93

**Withdrawals from groundwater - non-renewable**

0

**Withdrawals from produced/entrained water**



0

**Withdrawals from third party sources**

0

**Total water discharges at this facility (megaliters/year)**

174.97

**Comparison of total discharges with previous reporting year**

Higher

**Discharges to fresh surface water**

145.69

**Discharges to brackish surface water/seawater**

29.28

**Discharges to groundwater**

0

**Discharges to third party destinations**

0

**Total water consumption at this facility (megaliters/year)**

1,432.96

**Comparison of total consumption with previous reporting year**

Higher

**Please explain**

2019 amount for Canakkale Plant (CNK)

Withdrawal: 1,472.6 ML - 9% increase

Discharge: 149.86 ML - 16% increase

Consumption: 1,322.74 ML - 8.3% increase

Alternative Fuel increase of the plant, is increasing the gas temperature, thus more water is needed for cooling.

Also waste heat recovery system has produced more electricity considering last year, this also affects water consumed.

---

**Facility reference number**

Facility 3

**Facility name (optional)**

Ladik Cement Plant

**Country/Area & River basin**

Turkey

Other, please specify

Yesilirmak Basin

**Latitude**

40.5607

**Longitude**

35.5306

**Located in area with water stress**

No

**Total water withdrawals at this facility (megaliters/year)**

54.35

**Comparison of total withdrawals with previous reporting year**

Much lower

**Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes**

22.42

**Withdrawals from brackish surface water/seawater**

0

**Withdrawals from groundwater - renewable**

31.93

**Withdrawals from groundwater - non-renewable**

0

**Withdrawals from produced/entrained water**

0

**Withdrawals from third party sources**

0

**Total water discharges at this facility (megaliters/year)**

10.97

**Comparison of total discharges with previous reporting year**

Higher

**Discharges to fresh surface water**

10.97

**Discharges to brackish surface water/seawater**

0

**Discharges to groundwater**

0

**Discharges to third party destinations**

0

**Total water consumption at this facility (megaliters/year)**

43.38

**Comparison of total consumption with previous reporting year**

Much lower

**Please explain**

2019 amount for Ladik Plant (LDK)

Withdrawal: 110.33 ML - 49% decrease

Discharge: 6.08 ML - 80% increase

Consumption: 104.25 ML - 41% increase

In 2019, leakage prevention activities was completed. However the decrease of consumption by over 40 percent was led gauges to be change changed and maintained.

## W5.1a

**(W5.1a) For the facilities referenced in W5.1, what proportion of water accounting data has been externally verified?**

**Water withdrawals – total volumes**

---

**% verified**

76-100

**What standard and methodology was used?**

PwC, has verified total Water withdrawals – total volumes by 100%

**Water withdrawals – volume by source**

---

**% verified**

76-100

**What standard and methodology was used?**

PwC, has verified total Water withdrawals – volume by source by 100%

**Water withdrawals – quality**

---

**% verified**

Not verified

**Water discharges – total volumes**

---

**% verified**

76-100

**What standard and methodology was used?**

PwC, has verified Water discharges – total volumes by 100%

**Water discharges – volume by destination**

---

**% verified**

76-100

**What standard and methodology was used?**

PwC, has verified Water discharges – volume by destination by 100%

**Water discharges – volume by treatment method**

---

**% verified**

Not verified

**Water discharge quality – quality by standard effluent parameters**

---

**% verified**

76-100

**What standard and methodology was used?**

Canakkale (every 2 months) / Ladik (every 4 months) / Ambarlı Port Plants (the locations that has Wastewater Treatment Plants/Units) wastewaters are measured by accredited 3rd party laboratories.

SM2540D, TS5676, EPA200.7, SM5220B, TS4164, SM3500-Cr B, SM4500, SM2120C, SM2550B, SM4500, SM5520B

**Water discharge quality – temperature**

---

**% verified**

Not verified

**Water consumption – total volume**

---

**% verified**

76-100

**What standard and methodology was used?**

PwC, has verified Water consumption – total volume by 100%

**Water recycled/reused**

---

**% verified**

76-100

### What standard and methodology was used?

PwC, has verified Water recycled/reused by 100%

## W6. Governance


### W6.1


#### (W6.1) Does your organization have a water policy?

Yes, we have a documented water policy that is publicly available

#### W6.1a

#### (W6.1a) Select the options that best describe the scope and content of your water policy.

	Scope	Content	Please explain
Row 1	Company-wide	Description of business dependency on water Description of business impact on water Description of water-related performance standards for direct operations Description of water-related standards for procurement Company water targets and goals	Akcansa has a publicly available Quality, Environment, Energy and Health&safety Policy in place which covers all the integrated management system aspects in place, namely; ISO 9001, EN 197-2, ISO 14001, ISO 50001, and OHSAS 18001. Water-related aspects are included in and defined under environmental impacts. Monitoring, improving our environmental impact covering the whole life cycle of our products (including procurement phase) are our main environmental (including water) consideration as part of this Policy. The Policy is open to public access on our web site. The water management approach and strategy is also communicated in our Sustainability Reports. Performance targets are set at plant level and at employee level.  1

 1Akçansa\_Quality, Environment, Energy and Health and Safety Policy.pdf

## W6.2

**(W6.2) Is there board level oversight of water-related issues within your organization?**

Yes

### W6.2a

**(W6.2a) Identify the position(s) (do not include any names) of the individual(s) on the board with responsibility for water-related issues.**

Position of individual	Please explain
Director on board	Akçansa Chairman of the Board and Vice Chairman are the highest-level individuals with direct responsibility for all issues relating to environmental sustainability issues including energy, emissions and water management. The Chairman (representing Sabancı Holding) and Vice chairman (representing HeidelbergCement) are informed by Akçansa CEO (General Manager) about the progress on sustainability actions, targets and performance of Akçansa. The developments are periodically tracked by the Sustainability Working Committee, chaired by the Chief Operating Officer (deputy General Manager-Operations), who informs the CEO regularly at Executive Committee Meetings. Moreover, water data has been reported to HeidelbergCement on monthly basis with JANUS reports.

### W6.2b

**(W6.2b) Provide further details on the board's oversight of water-related issues.**

	Frequency that water-related issues are a scheduled agenda item	Governance mechanisms into which water-related issues are integrated	Please explain
Row 1	Scheduled - some meetings	Reviewing and guiding business plans Reviewing and guiding major plans of action	Water-related aspects are always included and periodically reviewed at an operational level. The board evaluates and approves business plans in line with our strategy across all underlying categories including environmental (water) related plans. Additionally, Akçansa



	Reviewing and guiding strategy	Sustainability Committee informs the CEO who consequently informs the board if/when critical water-related issues arise.
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## W6.3

**(W6.3) Provide the highest management-level position(s) or committee(s) with responsibility for water-related issues (do not include the names of individuals).**

### **Name of the position(s) and/or committee(s)**

Sustainability committee

### **Responsibility**

Both assessing and managing water-related risks and opportunities

### **Frequency of reporting to the board on water-related issues**

Half-yearly

### **Please explain**

Sustainability Steering Committee (SSC) which consists of Akçansa Executive Committee Members (GM and DGMs) is the highest-level management committee below Board-level. Its main mission is to approve and follow up sustainability targets & relevant projects. The annual practices and performance measurement of the company according to Sustainability Ambitions 2020 are conducted by Sustainability Working Committee which reports the practices realized, performance results obtained, performance improvements achieved in materiality issues to Sustainability Steering Committee directly and to the Board of Directors by means of risk reports. One of the critical tasks in environmental sustainability agenda has been the risks and opportunities in water related issues. The Plant has their own water management targets. The data collected from the plants are always checked and controlled by environmental and site engineers. The annual figures are shared in the Committee.

## W6.4

**(W6.4) Do you provide incentives to C-suite employees or board members for the management of water-related issues?**

	Provide incentives for management of water-related issues	Comment
Row 1	No, not currently but we plan to introduce them in the next two years	

## W6.5

**(W6.5) Do you engage in activities that could either directly or indirectly influence public policy on water through any of the following?**

Yes, direct engagement with policy makers

Yes, other

## W6.5a

**(W6.5a) What processes do you have in place to ensure that all of your direct and indirect activities seeking to influence policy are consistent with your water policy/water commitments?**

Akçansa recently established its 2030 sustainability roadmap containing 36 KPIs to monitor its performance. One of the 6 pillars of this roadmap is reducing environmental footprint. Under this pillar, water management and reducing our water footprint is considered. In order to achieve these targets, the process is monitored and approved by our Sustainability Steering and Working Committees and associated/necessary direct and indirect engagement actions are planned accordingly. Executive committee and the sustainability committee periodically check the progress. The results are shared with the stakeholders through our sustainability report available on Akçansa web site. Our engagements towards influencing the policy is therefore monitored and maintained as consistent with our overall corporate as well as sustainability strategy, which includes our water commitments.

## W6.6

**(W6.6) Did your organization include information about its response to water-related risks in its most recent mainstream financial report?**

No, but we plan to do so in the next two years

## W7. Business strategy

### W7.1

**(W7.1) Are water-related issues integrated into any aspects of your long-term strategic business plan, and if so how?**

	Are water-related issues integrated?	Long-term time horizon (years)	Please explain
Long-term business objectives	Yes, water-related issues are integrated	5-10	Water is a vital source for our process. Hence, maintaining/enabling water security is already integrated into our business plans. The water utilization targets are already included in 2030 Sustainability Roadmap they also were covered as part of our expired 2020 sustainability Targets. Business planning and our long-term objectives have been influenced in terms of water-related aspects in the form of dedicating a budget for water efficiency driven investments.
Strategy for achieving long-term objectives	Yes, water-related issues are integrated	5-10	As Akçansa, our strategic focus is to carry out our operations to the full potential while minimizing our negative environmental impact. Accordingly, water withdrawal reduction targets are included in 2030 sustainability goals. The strategy is to achieve reduction targets, to improve water management process through bringing new technology if available and to train our employees so that every person takes responsibility towards reaching company targets.
Financial planning	No, water-related issues were reviewed but not considered as strategically relevant/significant	5-10	Especially in Canakkale Plant a financial analysis have been studied for desalination project for the future need of plant however, is not evaluated to be a substantive impact on our financial planning.

## W7.2

**(W7.2) What is the trend in your organization's water-related capital expenditure (CAPEX) and operating expenditure (OPEX) for the reporting year, and the anticipated trend for the next reporting year?**

Row 1

---

**Water-related CAPEX (+/- % change)**

0

**Anticipated forward trend for CAPEX (+/- % change)**

100

**Water-related OPEX (+/- % change)**

6

**Anticipated forward trend for OPEX (+/- % change)**

26

**Please explain**

Due to Covid-19 issue in 2020, we had no water related Capex investment.

For 2021, we have 2 plant water related CAPEX investment to be implemented. The anticipated trend change is therefore 100%

Regarding; BCM - 3 rainwater collectors, CNK 3 biological + 6 physical Wastewater Treatment system, LDK 1 rainwater collector, 1 biological + 4 physical Wastewater treatment system, operational costs are consisting of general maintenance and analyses.

Between 2019 and 2020 our water related Opex has increased by 6% due to increased cost regarding maintenance and analyses.

For 2021, Anticipated water related Opex will further increased by 26% due to analyses, maintenance and cleaning cost together with estimated Water cost increase.

## W7.3

**(W7.3) Does your organization use climate-related scenario analysis to inform its business strategy?**

	Use of climate-related scenario analysis	Comment
Row 1	Yes	

## W7.3a

**(W7.3a) Has your organization identified any water-related outcomes from your climate-related scenario analysis?**

No

## W7.4

**(W7.4) Does your company use an internal price on water?**

Row 1

**Does your company use an internal price on water?**

No, but we are currently exploring water valuation practices

**Please explain**

In financial effect calculations, we use BCM average price to see the possible amount for water valuation across all our operations.

## W8. Targets

### W8.1

**(W8.1) Describe your approach to setting and monitoring water-related targets and/or goals.**

Levels for targets and/or goals	Monitoring at corporate level	Approach to setting and monitoring targets and/or goals
---------------------------------	-------------------------------	---

Row 1	Company-wide targets and goals Activity level specific targets and/or goals Site/facility specific targets and/or goals	Targets are monitored at the corporate level	General approach is to reduce Water consumption in all locations.
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## W8.1a

**(W8.1a) Provide details of your water targets that are monitored at the corporate level, and the progress made.**

**Target reference number**

Target 1

**Category of target**

Water consumption

**Level**

Company-wide

**Primary motivation**

Reduced environmental impact

**Description of target**

13% reduction of water consumption; (based on 2017-20 average => 0,231 m3/t cementitious)

**Quantitative metric**

% reduction per unit of production

**Baseline year**

2020



**Start year**

2020

**Target year**

2030

**% of target achieved**

0

**Please explain**

Starting from 2020 due to, inclusion of all locations.

And planned CAPEX's for Rainwater and further improvements will be started for 2022.

Sustainability Targets, Reducing environmental Footprint.

2030 target is 13% reduction of water consumption; (based on 2017-20 average => 0,231 m3/t cementitious)

## W9. Verification

### W9.1

**(W9.1) Do you verify any other water information reported in your CDP disclosure (not already covered by W5.1a)?**

Yes

### W9.1a

**(W9.1a) Which data points within your CDP disclosure have been verified, and which standards were used?**

Disclosure module	Data verified	Verification standard	Please explain
W1 Current state	Data disclosed on total water withdrawal amount by volume and by source has	ISAE 3000	Water withdrawal is an important KPI that we monitor as part of our 2030 sustainability targets. Therefore, accurately monitoring this data will enable us to

	been externally verified as per ISAE 3000 standard.		better progress against our set 2030 targets. Therefore, we aim to obtain verification to this data on an annual basis.
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## W10. Sign off

### W10.1

**(W10.1) Provide details for the person that has signed off (approved) your CDP water response.**

	Job title	Corresponding job category
Row 1	General Manager	Chief Executive Officer (CEO)

### W10.2

**(W10.2) Please indicate whether your organization agrees for CDP to transfer your publicly disclosed data on your impact and risk response strategies to the CEO Water Mandate's Water Action Hub [applies only to W2.1a (response to impacts), W4.2 and W4.2a (response to risks)].**

Yes