



**SUSTAINABILITY  
REPORT 2021**





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# GAMA ENERJİ A.Ş. SUSTAINABILITY REPORT 2021

SUSTAINABILITY REPORT 2021

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## MESSAGE FROM CEO



**TAMER ÇALIŞIR**  
GAMA ENERGY  
CEO AND BOARD MEMBER

**D**ear Stakeholders

In our first sustainability report that we are presenting to you as GAMA Enerji, we aimed to convey the sustainability approach we have adopted on behalf of GAMA Enerji in the past years and the practices we have implemented in this regard, even though our work for 2021 is predominant. In line with our corporate strategy, compliance with legislation, good corporate governance, operational efficiency, protection of natural resources, proactive identification of environmental and social risks and implementation of a proactive approach, and more environmentally oriented production activities are important principles that we have been implementing for years. In this direction, since the day we realized our first production, we have been maintaining transparent communication with our stakeholders and informing them in line with these principles. With this report, we are pleased to inform the entire public with reference to GRI Sustainability Reporting Standards.

We left behind another challenging year both in the world and in GAMA Enerji, especially due to the restrictions and obstacles brought to our lives by the Covid-19 pandemic. For this process, which we followed with high sensitivity from the beginning of the pandemic, we ensured the establishment of the Covid-19 Crisis Management Team and the preparation of the "Covid-19 Emergency Response Plan" and "Remote and Short-Term Working Procedure".

In 2021, despite the troubles experienced in the world and in our country, GAMA Enerji successfully completed the financial restructuring process of the debts of the İç Anadolu Natural Gas Combined Cycle Power Plant, which was being established at the end of 2017. Within the scope of the Kremna debt restructuring, we are in agreement with the banks on the contractual terms and we have completed the process in February 2022.

In 2021, we closed the year with a 16% increase in EBITDA in USD terms compared to 2020 and a 28% increase compared to the budget. Despite the drought we experienced as a country, with the high share of our İç Anadolu Natural Gas Combined Cycle Power Plant (İÇAN), we increased the total generation amount of our energy assets in 2021 by 9% compared to 2020 and completed the year with 5.44 TWh. I would also like to mention that the smooth completion of the maintenance of our power plants contributed significantly to our high production targets. Furthermore, İÇAN Secondary Frequen-

**In our sustainability report, we aimed to convey the sustainability understanding we have adopted on behalf of GAMA Energy in the past years and the practices we have implemented in this regard, although our efforts for 2021 are predominant.**

cy Control capacity was increased up to 450 MW in November as part of our complete internal upgrade project, resulting in an increase in the plant's operational flexibility and commercial positioning capability. Finally, at Diwaco, we delivered 103.8 mcm of water as of December 31, 2021 for the drought-stricken Jordanian people as a result of the request of the Jordanian Ministry of Water and Irrigation and the agreement reached with the lenders.

2021 was also a year in which we took important steps in terms of digitalization. We initiated the installation of an electronic document management system and integrated all incoming and outgoing document management and certain workflow processes into this system. Our efforts to transition our central archive to the electronic document management system are also in full swing.

With the contributions of our two "Gold Standard" and one "Verified Carbon Standard" hydroelectric power plants, we sold a total of 242,516 tons of Carbon Credits and 328,598 I-REC certificates in our renewable energy investments within the scope of our targets to improve carbon emission values.

With the labor of our volunteer employees, we have made and continue to make innovative developments in the name of sustainability and human resources within the scope of the "Do More with Less" project we launched in March 2021.

Within the scope of environmental sustainability, we took our first steps towards the goal of raising awareness of GAMA Enerji employees and changing consumption habits in a way that protects the environment and nature by placing recycling bins in our work areas and removing individual garbage bins within the scope of our Kaino group's project.

In addition to this initiative, in order to support the sustainable use of resources with the awareness of ISO 14001 and ISO 50001 "Environmental Awareness" in Environmental Management; we have worked to use energy and material resources efficiently, we have taken measures to reduce waste generation within the scope of environmental performance assessment project targets, and we have worked to increase recycling rates in hazardous and non-hazardous waste. In 2021, as a result of the studies carried out, we received our Basic Level Zero Waste

certificate within the scope of all our assets.

Within the scope of the "Do More With Less" project, we have implemented the hybrid working model as of January 2022, for which the ForUs group proposed the roadmap and implementation principles, and we plan to observe its contribution and reflections on our work for a certain period of time.

In addition, we started to analyze the current business model and organizational structure of GAMA Enerji within the scope of the "Strategic Human Resources Project" we launched in the last quarter of 2021. We are planning to reintroduce the electronic tracking system of goal cards, which was also requested by our employees and which we suspended for a while. In this process, we will continue our efforts to improve and develop Human Resources and Management Systems throughout 2022 regarding our organizational development areas that emerged within the scope of our analysis studies by issuing our "Organizational Design", "Defining Culture", "HR Management", "Processes and Organizational Structure", "Leadership Culture Development, Future Strategies and Organizational Clarity" action plans.

We believe that with the implementation of the People & Harmonise program in 2022 to be used in employee management, especially in Human Resources recruitment processes, we will be one step closer to our goal of digitalizing processes such as candidate application evaluations, interview organizations and personality inventory submission.

We know that a year full of challenges and obstacles awaits us in 2022. However, I firmly believe that we have a very clear path ahead of us as we march towards the goals we have set, thanks to the perseverance, motivation and resilience of our partners, especially GAMA Holding, Tenaga and IFC, and most importantly, the valuable Chiefs of GAMA Enerji.



# ABOUT THE REPORT

*As GAMA Enerji, we have prepared this report to convey our sustainability efforts and current developments in the field of sustainability.*

Sustainability is one of the most important issues for GAMA Enerji, as it is for many companies operating in the energy sector. GAMA Enerji evaluates and manages the environmental, social and governance impacts of its activities within the scope of sustainability. As GAMA Enerji, we have prepared our Sustainability Report in order to convey our activities and current developments within the scope of sustainability. This report contains information about our sustainability policy covering GAMA Enerji and all its assets, our management systems practices, our work in environmental, social and economic areas, the value we attach to our employees and our social responsibility projects.

Since the mid-2010s, GAMA Enerji has been monitoring and reviewing a wide range of sustainability data and information through internal reporting and audits, and making improvements where necessary. We voluntarily share our management and reporting of sustainability issues with our stakeholders and the public in accordance with the GRI Standards Core option, an international standard.

Our report covers our activities, developments, production and all our assets in the period January 1, 2021 - December 31, 2021. With this report, we, as GAMA Enerji, present our practices, activities and performance in environmental, social and governance issues. In addition, we also convey our contributions to the Sustainable Development Goals and our targets.

This report is available under GRI Standards: Basic.  
It has been prepared in accordance with GAMA Energy and reveals our environmental and social performance.

**Within the scope of the report, we provide information about our activities as GAMA Enerji, our approach to the concept of sustainability, our management system, our work in the field of health and safety, the value we attach to our employees and our social responsibility projects and activities.**



Gök II Wind Power Plant

Our report covers our activities, developments, productions and all our regions in the period January 1, 2021 - December 31, 2021.





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# **ABOUT GAMA ENERJİ**







## AWARDS

**126<sup>TH</sup>  
FORTUNE 500  
AWARD  
2020**

Fortune Turkey  
& CRIF Turkey

**ICCI  
NATURAL GAS  
CATEGORY  
ENERGY AWARD  
2018**  
ICCI

**ICCI  
NATURAL GAS  
CATEGORY  
ENERGY AWARD  
2017**  
ICCI

**GOLDEN VOLTAGE  
2017**  
8<sup>th</sup> Türkiye  
Energy Summit

**GOLDEN VOLTAGE  
2016 (GATES)**  
8<sup>th</sup> Türkiye  
Energy Summit

**GOLDEN VOLTAGE  
2016 (GAMA)**  
8<sup>th</sup> Türkiye  
Energy Summit

**LOW CARBON  
HERO  
2017**  
Sustainable Production and  
Consumption Association

**CONSTRUCTION  
PROJECT OF THE  
YEAR  
2013**  
EMEA Finance

## SUBSIDIARIES



### İç Anadolu Doğalgaz Elektrik Üretim ve Ticaret A.Ş.

İç Anadolu Natural Gas Combined Cycle Power Plant (IACCCPP), owned by İç Anadolu Doğalgaz Enerji Üretim ve Ticaret AŞ, in which GAMA Enerji holds a 96% stake, is Türkiye's first digital natural gas combined cycle power plant with an installed capacity of 853 MW. A power plant and switchyard turnkey contract was signed with GAMA Güç Sistemleri and GE Enerji Consortium in September 2013 for the power plant investment, and the provisional acceptance and transfer of the power plant was realized on December 24, 2016.



### Kremna Enerji Üretim ve Ticaret A.Ş.

Karacaören-I and Karacaören-II hydroelectric power plants are located within the borders of Bucak district of Burdur province and are cascade and dam type. Karacaören-I HPP was commissioned in 1990 with an installed capacity of 32 MW. Karacaören-II HPP has an installed capacity of 46.4 MW and became operational in 1993.



### GARET Energy Production and Trade Inc.

GARET, in which GAMA Enerji holds a 98.79% stake, was established in March 2006 to develop wind energy projects. The company has four generation facilities totaling 117.5 MW, including the 27.5 MW Sares WPP in Ezine, Çanakkale, which became commercially operational in March 2011, the 10 MW Karadağ WPP in Aliağa, İzmir, which became commercially operational in July 2012, the 35 MW Gökres-II WPP in Akhisar, Manisa, which became commercially operational in August 2014, and the 45 MW Kırkağaç WPP, which became commercially operational with two turbines in October 2016 and all turbines were accepted in February 2017.



### TGT Enerji Üretim ve Ticaret A.Ş.

The Lamas III-IV HPP project was started in 1986 according to the BOT model. Following the enactment of the Energy Market Law No. 4628, TGT Enerji Üretim ve Ticaret A.Ş. waived its rights under the BOT Law and applied to EMRA in October 2005 to obtain a Production License and obtained a production license in August 2006. In 2009, Lamas III-IV HPP started commercial operation and has a total installed capacity of 35.3 MW.



### ANADOLU Elektrik Üretim Ticaret Sanayi A.Ş.

ANADOLU Elektrik Üretim Ticaret Sanayi A.Ş. was established to operate within the framework of Law No. 4628 and related regulations. Çakırlar HPP, with an installed capacity of 16.2 MW, located on Murgul Stream in Artvin province, was granted a production license in March 2007 for 49 years. At the end of 2007, the loan agreement was signed and the facility started commercial operation in August 2009.



## SUBSIDIARIES

**GATES**



### GATES Enerji Ticaret A.Ş.

GATES Enerji Ticaret A.Ş. was initially established to operate in the field of electricity wholesale under the title of GATES Elektrik Enerjisi Toptan Satış A.Ş. and obtained the Supply License, then called Wholesale License, issued by EMRA in 2007 for 20 years. Thanks to this license, GATES has the right to sell electricity to end-users who are eligible to become Eligible Consumers and to buy and sell wholesale electricity. GATES currently operates in five main areas and continues to strengthen its infrastructure. GATES's fields of activity are Eligible Consumers, Over-the-Counter Markets and Bilateral Agreements, Natural Gas, Portfolio Optimization and Carbon Trading of Assets.

### GEAŞ İşletme ve Bakım A.Ş.

GEAŞ İşletme ve Bakım A.Ş. was established in 2013 to carry out the operation and maintenance activities of the electricity generation assets in GAMA Enerji's portfolio. The company is responsible for the operation, planned and unplanned maintenance, spare parts and warehouse management, administrative affairs and coordination with government authorities for the power plants of the subsidiaries.

## OUR FOREIGN SUBSIDIARIES



### Disi Water Private Shareholding Company Limited

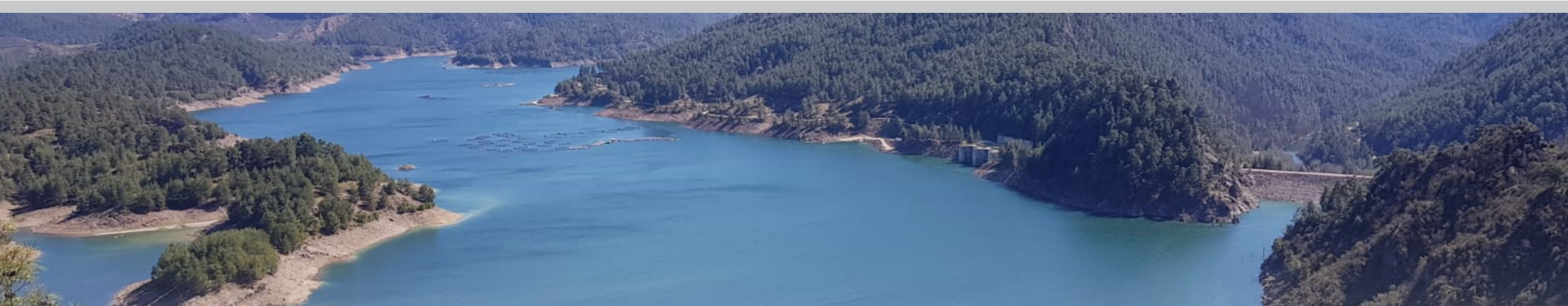
Disi is an infrastructure water supply project with a total investment of US\$1.1 billion, helping to solve the water crisis in and around the Jordanian capital Amman. The project involves the Jordanian Ministry of Water and Irrigation delivering 100 million m3 of water per year from the Disi-Mudawarra water aquifer in the Aqaba region to the city of Amman under a Build-Operate-Transfer concession agreement based on a 25-year purchase guarantee.



Sares Wind Power Plant



# ASSETS



**Karacaören I-II  
Dam Type  
Hydroelectric  
Power Plant**

<b>Installed Power:</b>	<b>TOTAL:78.4 MW</b> K1:32 MW K2:46.4 MW	<b>Commercial Operation Date:</b>	<b>K1:1990</b> <b>K2:1993</b>	<b>Location:</b>	<b>Burdur, Türkiye</b>
<b>Annual Average Electricity Production:</b>	<b>TOTAL:155.42 GWh</b> K1:56.76 GWh K2:98.66 GWh	<b>License Duration:</b>	<b>49 years from 2016</b>		



**Lamas III-IV  
Run-off River  
Hydroelectric  
Power Plant**

<b>Installed Power:</b>	<b>35.3 MW</b>	<b>Commercial Operation Date:</b>	<b>2009</b>	<b>Location:</b>	<b>Mersin, Türkiye</b>
<b>Annual Average Electricity Production:</b>	<b>60.80 GWh</b>	<b>License Duration:</b>	<b>49 years from 2006</b>		

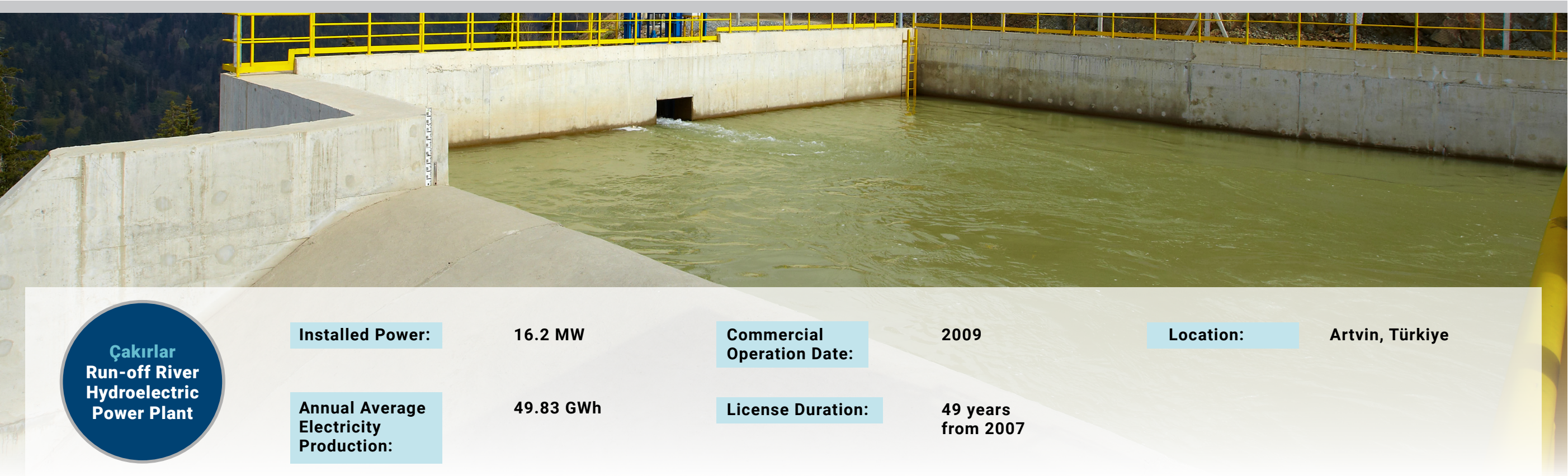


# ASSETS



**İçanadolu  
Natural Gas  
Combined Cycle  
Power Plant**

<b>Installed Power:</b>	<b>853 MW</b>	<b>Commercial Operation Date:</b>	<b>2016</b>	<b>Location:</b>	<b>Kırıkkale, Türkiye</b>
<b>Annual Average Electricity Production:</b>	<b>4,156.11 GWh</b>	<b>License Duration:</b>	<b>49 years from 2011</b>		



**Çakırlar  
Run-off River  
Hydroelectric  
Power Plant**

<b>Installed Power:</b>	<b>16.2 MW</b>	<b>Commercial Operation Date:</b>	<b>2009</b>	<b>Location:</b>	<b>Artvin, Türkiye</b>
<b>Annual Average Electricity Production:</b>	<b>49.83 GWh</b>	<b>License Duration:</b>	<b>49 years from 2007</b>		



# ASSETS

Sares  
Wind  
Power Plant

Installed Power:

27.50 MW

Annual Average  
Electricity  
Production:

89.45 GWh

Commercial  
Operation Date:

2011

License Duration:

49 years  
from 2008

Location:

Çanakkale, Türkiye

Gök II  
Wind  
Power Plant

Installed Power:

35 MW

Annual Average  
Electricity  
Production:

108.16 GWh

Commercial  
Operation Date:

2014

License Duration:

49 years  
from 2012

Location:

Manisa, Türkiye



ASSETS

Karadağ  
Wind  
Power Plant

Installed Power:

10 MW

Commercial  
Operation Date:

2012

Location:

İzmir, Türkiye

Annual Average  
Electricity  
Production:

29.53 GWh

License Duration:

42 years  
from 2008

Kirkagac  
Wind  
Power Plant

Installed Power:

45 MW

Commercial  
Operation Date:

2016

Location:

Manisa, Türkiye

Annual Average  
Electricity  
Production:

173.73 GWh

License Duration:

45 years, 2 months and  
7 days from 2015



ASSETS



Disi  
Mudawarra-  
Amman Water  
Delivery Project

Water Supply  
Capacity:

100 million m<sup>3</sup>/year as per  
the terms of the existing

Commercial  
Operation Date:

2014

Concession Period:

25y from 2014

Location:

Amman, Jordan



## ASSETS IN TÜRKİYE



4

**HPP**  
129.90 MW



4

**WPP**  
117.50 MW



1

**CCGT Plant**  
853.00 MW

**TOTAL INSTALLED CAPACITY: 1,100.40 MW**

## INTERNATIONAL ASSETS



1

**WATER SUPPLY**  
100 mcm p.a.

**TOTAL WATER SUPPLY: 100 mcm p.a. as per the existing**



**853 MW** KIRIKKALE  
İÇ ANADOLU  
CCGT Plant



**27.50 MW** ÇANAKKALE  
SARES  
WPP



**10 MW** İZMİR  
KARADAĞ  
WPP



**45 MW** MANİSA  
KIRKAĞAÇ  
WPP



**35 MW** MANİSA  
GÖK II  
WPP



**16.2 MW** ARTVİN  
ÇAKIRLAR  
RUN-OFF RIVER HPP



**32 MW** BURDUR  
KARACAÖREN-I  
DAM TYPE HPP



**46.4 MW** BURDUR  
KARACAÖREN-II  
DAM HPP



**35.3 MW** MERSİN  
LAMAS III-IV  
RUN-OFF RIVER HPP





# **CORPORATE GOVERNANCE AND PERFORMANCE**



# BOARD OF DIRECTORS

Our top management unit at GAMA Enerji is the Board of Directors. Thanks to our strong international partnership structure, our Board of Directors has 7 nominated members, 1 from IFC and GIF, 2 from Global Power and 4 from GAMA Holding.

The highest management unit at GAMA Enerji is defined as the Board of Directors. The Board of Directors is the highest governance body responsible for overseeing the corporate governance, environmental, social and financial performance of GAMA Enerji and its subsidiaries, and ensuring that all activities of the company and its subsidiaries are carried out in compliance with national legislation, shareholders' own practices, internal regulations and policies. Our Board of Directors consists of seven members, including 2 members nominated by Tenaga Nasional Berhad - Global Power, GAMA Enerji's shareholders, 1 member nominated by IFC and GIF and 4 members nominated by GAMA Holding. We have one female member in our Board of Directors. We make a decision regarding the members of our Board of Directors after examining the education background and experience of professionals who are experts in their fields and we select our members among candidates who can guide GAMA Enerji's policies and strategies. Our Board of Directors is responsible for establishing effective communication between the Company and its subsidiaries and other stakeholders, resolving any disputes that may arise and resolving disputes in an appropriate mediated manner. In addition, it increases its effectiveness in governance through its committees and ensures that more appropriate decisions are made regarding the relevant processes in the company and its subsidiaries.



**Ahmet Hakan Özman**  
Chairperson of the Board  
of GAMA Enerji A.Ş.



**İsmail Omer Tuncata**  
Vice Chairperson of the  
Board of Directors



**İrem Baysal**  
Board Member



**Tamer Çalışır**  
Board Member and CEO



**Nazmi Bin Othman**  
Board Member



**Hafiz Bin İsmail**  
Board Member



**Bruno François  
Xavier Navarro**  
Board Member



In addition to our CEO and Deputy General Managers responsible for Legal Affairs, Financial Affairs and Operations under our Board of Directors, the Boards of Directors established for each of our subsidiaries are responsible for the management of each subsidiary separately and increase the governance capability of GAMA Enerji. For each of our subsidiaries in Türkiye, there is one female member on the Board of Directors. In addition, 50% of our employees who serve as senior directors are women.

*The Board of Directors is the highest governance body responsible for overseeing the corporate governance, environmental, social and financial performance of GAMA Enerji and its subsidiaries, and ensuring that all activities of the company and its subsidiaries are carried out in compliance with national legislation, shareholders' own practices, internal regulations and policies.*



# GAMA ENERJİ COMMITTEES

Committees directly reporting to the Board of Directors are listed below.

## AUDIT, RISK AND CORPORATE GOVERNANCE COMMITTEE:

The purpose of the Committee is to determine the size and composition of the Board of Directors, to examine whether the Board of Directors is functioning effectively, to establish and implement the main principles of corporate governance, to ensure the accuracy of financial statements, to ensure compliance with legal and regulatory requirements, to ensure that external audits are carried out independently in accordance with their purpose, to carry out internal audits and to oversee the effectiveness of the current risk management system to ensure that risks are well managed. The Committee submits an annual report to the Board of Directors for all shareholders.

## REMUNERATION AND NOMINATION COMMITTEE:

The purpose of the Committee is to identify candidates, determine the level of remuneration and other benefits of candidates, taking into account the organizational structure of the company, key personnel and management needs. The Committee assists the human resources department in establishing an appropriate management structure for senior management. It assists the Board of Directors in evaluating the performance of senior management and key personnel.



## INVESTMENT SCREENING COMMITTEE:

The purpose of the Committee is to develop strategies, targets and policies on the investments to be made by the company, to evaluate opportunities for privatization, acquisition, project generation, investment realization and to examine them within the framework of company and stakeholder strategies, as well as to dispose of existing investments and to evaluate the performance of assets/investments annually. The Committee submits an annual report to the Board of Directors and all stakeholders.

## SUSTAINABILITY COMMITTEE:

The Sustainability Committee was established by GAMA Enerji's Board of Directors to assist the Board in voluntarily incorporating internationally recognized sustainable development standards into internal policies on issues such as labor, health, safety, operational safety, environmental issues, human rights, climate change, water safety and corporate governance. The Committee's objectives are to support the Board in fulfilling its responsibilities to develop, implement and monitor GEAŞ's sustainability policies.

Within the scope of the Committee's activities, a sustainability working group, which includes employees from various departments, was established to ensure that all internal stakeholders follow the ongoing sustainability efforts and provide feedback by commenting on them when necessary.



This section includes the committees directly reporting to the Board of Directors.





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# OUR SUSTAINABILITY APPROACH



# MANAGEMENT SYSTEMS PRACTICES WITHIN THE SCOPE OF SUSTAINABILITY

*We have a total of 49 management systems certificates and we consider the implementation, continuous improvement, monitoring and support of the systems as part of GAMA Enerji's business processes.*

**W**e successfully implement many integrated management systems to manage our business processes effectively and efficiently and to design business processes that respect people and nature in GAMA Enerji and all our affiliated assets. We have adopted the principle of applying the management approach we have established as GAMA Enerji headquarters with the same level of quality in all our domestic and international assets operating within our scope, and for this purpose, we have built the following management systems in an integrated manner and completed the certification process:

ISO 9001	: Quality Management Systems
ISO 14001	: Environmental Management Systems
ISO 45001	: Occupational Health and Safety Management
ISO 50001	: Energy Management Systems
ISO 27001	: Information Security Management Systems
ISO 55001	: Asset Management Systems

We have a total of 49 management systems certificates and we consider the implementation, continuous improvement, monitoring and support of the systems as part of GAMA Enerji's business processes.

In 2021, together with GAMA Enerji and all our subsidiaries operating in Türkiye, we successfully completed the re-certification studies for Integrated Management Systems carried out by third-party independent auditing firms and successfully completed the certificate continuity studies in Energy and Information Management Systems and ensured the continuity of the certificates.

**IFC, one of the partners of GAMA Enerji, conducts field inspections of one or more of our assets every year within the scope of "IFC performance standards".**

In 2022, Integrated, Energy and Information Management Systems audits to be carried out by third-party independent audit firms will be carried out within the scope of GAMA Enerji and our affiliated assets.

We review all the management systems we implement through the annual internal audit program approved by the Board of Directors, identify areas open to improvement through these comprehensive internal audit organizations, improve practices within the framework of change management principles and thus make them a part of continuous development and transformation processes.

Every year, we conduct field inspections of one or more of our assets under the guidance of "IFC performance standards" published by IFC, one of the partners of GAMA Enerji. The 8 performance standards published on environmental and social sustainability issues implemented by our companies are evaluated by foreign or Turkish experts. After these audits, where our compliance with high standard requirements on the international platform is reviewed, our areas open to improvement are reported. We update our systems and raise the implementation standards by evaluating improvement opportunities for the systems we are implementing.

In addition, we prepare our annual environmental and social performance reports covering GAMA Enerji and all our assets and submit them to IFC.

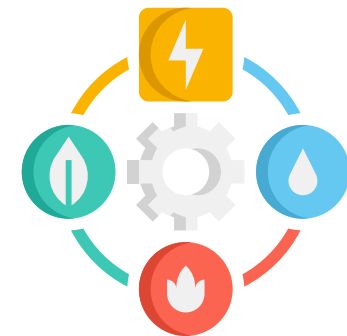
In addition to this report, we present our comprehensive report prepared annually for the European Bank for Reconstruction and Development (EBRD), which is the lender for our Karacaören 1 and Karacaören 2 HPP facilities, covering the EBRD Environmental and Social performance requirements to the EBRD authorities together with IFC, another lender for this project.

Our assets are audited by third-party auditors within the scope of our environmental and social activities by lender institutions, which are important stakeholders of GAMA Enerji, and annual reports are regularly prepared, areas open to improvement are identified and our systems are updated in line with the principle of continuous improvement.

In 2021, our İç Anadolu Natural Gas Combined Cycle Power Plant was subjected to an annual audit of our environmental, occupational health and safety and social performance by a third-party independent firm deemed appropriate by our lenders in line with our recently concluded restructuring efforts, and the results of this audit are reported to both our lenders and us simultaneously.

With these studies, we transparently demonstrate to our internal and external stakeholders that GAMA Enerji and all our subsidiaries operate in compliance with both national and international legislation and standards.

*With these studies, we transparently demonstrate to both our internal and external stakeholders that GAMA Enerji and all affiliated assets operate in compliance with both national and international legislation and standards.*



All management systems in place are reviewed through the annual internal audit program approved by the Board of Directors. Through these comprehensive internal audit organizations, areas open to improvement are identified and practices are improved within the framework of change management principles, thus becoming a part of continuous development and transformation processes.



## OUR AUDIT PROCESSES

We support the continuous improvement of company operations through the integrated implementation and certification of management systems.



We implement an internal audit program approved by the Board of Directors for all management systems. Through these comprehensive internal audits, we evaluate the issues open to improvement in all systems and business processes and improve these issues in light of the established change management principles.

In GAMA Enerji and all our affiliated companies, we implement ISO 9001 Quality Management System, ISO 14001 Environmental Management System, ISO 45001 Occupational Health and Safety Management System and ISO 50001 Energy Management System in an integrated manner in order to achieve operational excellence and effective and efficient management of all our business processes. We support the continuous improvement of the company's operation through the integrated implementation and certification of management systems. We regularly conduct internal and external audits in order to review the effective operation and currency of these systems, identify issues that can be improved, prepare action plans on these issues and implement them.

We implement an internal audit program approved by the Board of Directors for all management systems. Through these comprehensive internal audits, we evaluate the issues open to improvement in all systems and business processes and improve these issues in light of the established change management principles. In this way, we ensure continuous development, change and transformation throughout the system.

In addition to the internal audits we carry out, we ensure the continuity of all certification by conducting audits by third-party independent auditing firms to review the compliance of all systems (ISO 9001: 2015 Quality Management Systems, ISO 14001: 2015 Environmental Management Systems, ISO 45001: 2018 Occupational Health and Safety Systems, ISO 50001 Energy Management Systems, ISO 27001: 2013 Information Security Management Systems) that have been established in an integrated manner for both the headquarters and assets.

In addition to internal and external audit practices, we regularly organize a supervision program for one or more GAMA Enerji assets every year under the guidance of "IFC performance standards" published by the International Finance Corporation (IFC), one of GAMA Enerji's partners. As a result of these supervisions, the compliance with the high standard requirements of the IFC is checked and we enable the IFC to indicate the areas open for improvement. After these supervisions, we organize an action plan addressing all these issues and share it with IFC officials. Again, we follow up the actions taken and the results by carrying out the relevant work in line with this plan. In this way, we evaluate opportunities for improvement, update the systems within the company and raise the implementation standards.

Specific to our Karacaören I and Karacaören II HPP facilities, we present a comprehensive report prepared annually for EBRD, one of the lenders of our facilities, covering EBRD Environmental and Social performance requirements to both EBRD and IFC officials, another lender of this project.

In addition, we prepare and submit to IFC an "Environmental and Social Performance Report" annually, in which our environmental and social performance is evaluated in general, including GAMA Enerji and all our assets.

In addition to all these activities, third-party auditors conduct audits of our assets within the scope of our environmental and social activities by the creditor institutions, which are our stakeholders, and we regularly submit the annual reports of these studies to our relevant stakeholders.

With all these auditing, monitoring and improvement activities, we transparently demonstrate to all our internal and external stakeholders that GAMA Enerji and all our subsidiaries operate in compliance with national and international legislation and standards.

*With all these auditing, monitoring and improvement activities, we transparently demonstrate to all our internal and external stakeholders that GAMA Enerji and all our subsidiaries operate in compliance with national and international legislation and standards.*



OUR CERTIFICATES

<div>ISO 9001-2015 QUALITY MGMT SYS</div>	<div>ISO 14001-2015 ENV. MGMT SYS</div>	<div>ISO 50001-2018 ENERGY MGMT SYS</div>	<div>ISO 45001-2018 OHS</div>	<div>ISO 55001 ASSETS MGMT SYS</div>	<div>ISO 27001-2013 ASSETS MGMT SYS</div>
<div>HPP ÇAKIRLAR HPP LAMAS HPP KARACAÖREN I HPP KARACAÖREN II HPP</div> <div>WPP GÖKRES SARES KARADAĞ KIRKAĞAÇ</div> <div>Disi DIWACO DAOM</div> <div>GAMA ENERJİ HQ</div> <div>Energy Trading Company GATES</div> <div>Maintenance Company GEAŞ O&amp;M</div> <div>NGCCP ICAN</div>	<div>HPP ÇAKIRLAR HPP LAMAS HPP KARACAÖREN I HPP KARACAÖREN II HPP</div> <div>WPP GÖKRES SARES KARADAĞ KIRKAĞAÇ</div> <div>Disi DAOM</div> <div>GAMA ENERJİ HQ</div> <div>Energy Trading Company GATES</div> <div>Maintenance Company GEAŞ O&amp;M</div> <div>NGCCP ICAN</div>	<div>HPP ÇAKIRLAR HPP LAMAS HPP KARACAÖREN I HPP KARACAÖREN II HPP</div> <div>WPP GÖKRES SARES KARADAĞ KIRKAĞAÇ</div> <div>GAMA ENERJİ HQ</div> <div>NGCCP ICAN</div>	<div>HPP ÇAKIRLAR HPP LAMAS HPP KARACAÖREN I HPP KARACAÖREN II HPP</div> <div>WPP GÖKRES SARES KARADAĞ KIRKAĞAÇ</div> <div>Disi DAOM</div> <div>GAMA ENERJİ HQ</div> <div>Energy Trading Company GATES</div> <div>Maintenance Company GEAŞ O&amp;M</div> <div>NGCCP ICAN</div>	<div>Disi DAOM</div>	<div>GAMA ENERJİ HQ</div> <div>NGCCP ICAN</div>



\* Mgmt Sys: Management System



# RISK MANAGEMENT

**GAMA Enerji has a risk management structure that covers every power plant and every department at every level.**

*Each department and entity has a Risk Manager who identifies and monitors the risks and opportunities for their processes and operations.*



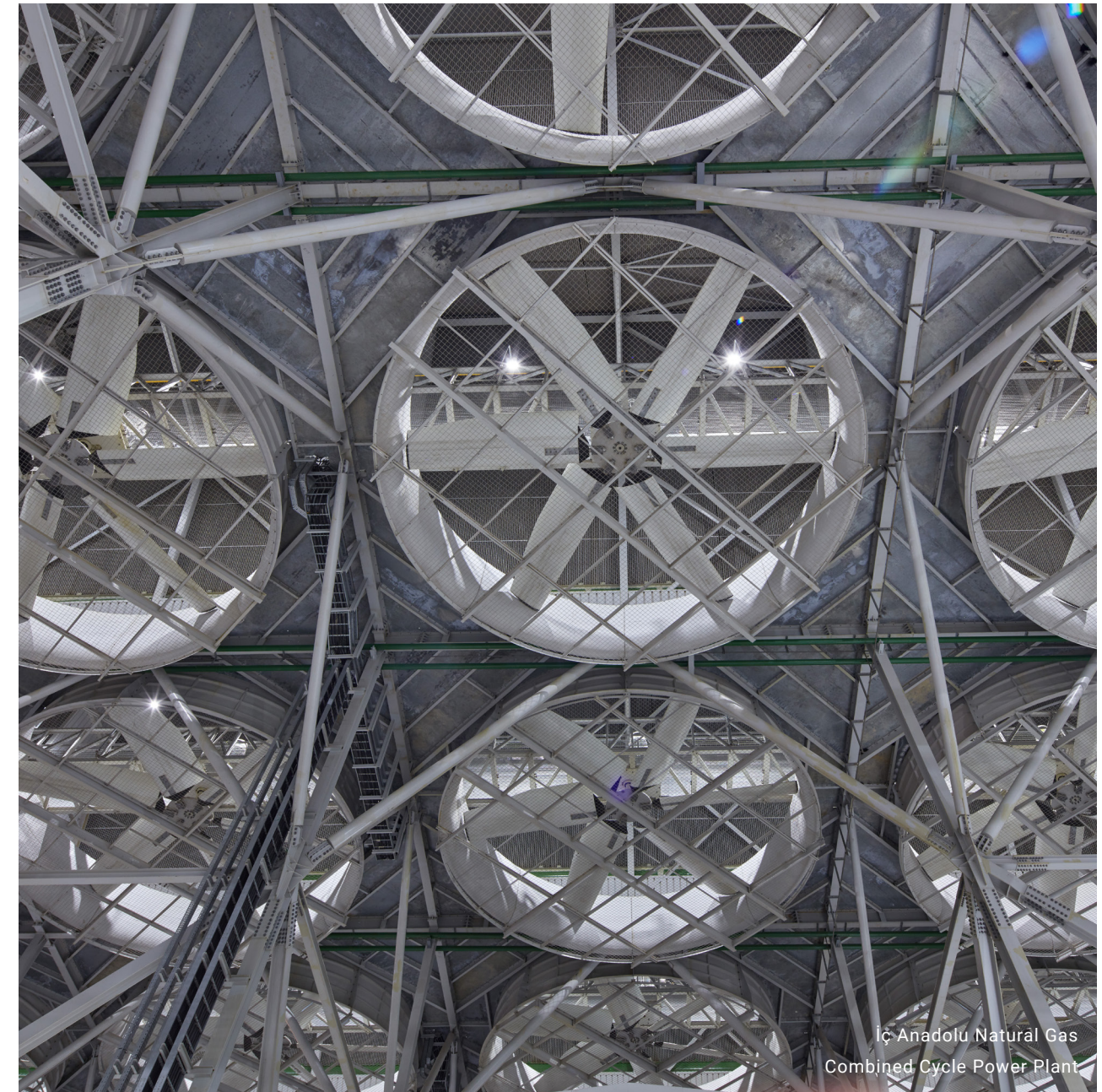
In our corporate risk management process, department risk officers, Strategic Planning and Corporate Development (SPCD) department, Quality, Occupational Health and Safety and Environment (QHSE) department, Deputy General Managers and the CEO play an active role.

**G**AMA Enerji has a risk management structure that covers every power plant and every department at every level. In our corporate risk management process, department risk officers, Strategic Planning and Corporate Development (SPCD) department, Quality, Occupational Health and Safety and Environment (QHSE) department, Deputy General Managers, CEO play an active role. In addition, we request all our GAMA Enerji employees to inform their managers and SPCD Director about the risky issues they see and/or the risk issues that they think may not have been taken effectively and their opinions and suggestions for more effective risk management. In this way, we provide priority to receive information quickly about the risks that may occur in every field and we start working to take measures in this sense.

Each department and asset has a Risk Officer who identifies and monitors risks and opportunities for their own processes and operations. Risk Officers periodically communicate the status/developments of risks and opportunities to the SPCD Department. Our SPCD department is responsible for executing the corporate risk management strategy within GAMA Enerji. It coordinates our corporate risk management process and monitors it for its systematic operation. Our QHSE department, on the other hand, monitors the risk assessment studies carried out within the scope of the management system and ensures that they are documented. Our SPCD department prepares a



İç Anadolu Natural Gas  
Combined Cycle Power Plant



İç Anadolu Natural Gas  
Combined Cycle Power Plant

summary report on the risk status of our company every month by receiving data from our risk officers.

We convene quarterly as the GAMA Enerji Risk Committee, consisting of the CEO, all Deputy General Managers, SPCD Director and the Risk Units of our partners, and conduct a risk assessment of our company. We ensure the participation of other relevant managers in this meeting when necessary. We record the actions determined at the meeting with meeting notes and review them at the next meeting.

*We record the actions determined at the Risk Committee meeting, which convenes quarterly, with meeting notes and review them at the next meeting.*





Our risk management processes are managed by the Deputy General Manager in charge of Operations during the development phase of projects, and by the Deputy General Managers and Risk Officers in charge of Operations for projects in the construction and/or operation phase, and our unit risk management processes are managed by the relevant Deputy General Managers and Risk Officers.

We address the risk management carried out at GAMA Enerji under 4 main headings:

- Risk management process during the investment decision period, including the investment decision-making process
- Risk management process during the construction period in projects where investments are initiated
- Risk management process covering the work of all units that may affect the operational, strategic and financial targets of the company
- GAMA Enerji Senior Management risk management process

Risk management for each process consists of 7 basic stages. These are;

1. Defining organizational/project/unit objectives
2. Identifying risks and opportunities
3. Making risk and opportunity analysis
4. Assessing risks and opportunities
5. Improving risks and opportunities (preparing and implementing action plans)
6. Reporting/communication
7. Feedback step

Our Risk Management process starts with the evaluation of the investment decision in projects and continues as long as the operation process continues, until any share transfer. In units, the risk management process continues as long as the unit exists.

Our specified risk management processes are managed by the Deputy General Manager in charge of Operations during the development phase of projects, and by our Deputy General Managers and Risk Officers during the construction and/or operation phase of projects, and our departmental risk management processes are managed by the relevant Deputy General Managers and Risk Officers. Our Department Risk Officers are responsible for identifying and analyzing the risks related to their work, determining and implementing actions and action plans, reviewing and updating risks according to changing conditions, monitoring, managing and preparing risk reports.

Our risk reports must be prepared monthly for each ongoing investment, asset and related unit, as well as process-based and semi-annual reports within the scope of management systems, and submitted to the SPCD Director by each Risk Officer. All risk reports are reviewed by our SPCD Department, which conveys its opinions and suggestions, if any, to the relevant Risk Officers. If there are areas in the reports that require correction, additional information and clarification, the work for these is carried out by the teams preparing the report.

In the risk/opportunity assessment phase, probability and impact ratings are made for each risk and opportunity item, and as a result, the criticality of the risk or opportunity is calculated and rated. Ratings from 1 to 4 are determined according to the additional cost/income it will create for financial risks. For non-financial risks, it is rated according to the impact on the growth and/or reputation of the business/company.

The "Critical Risks" sections of the risk reports prepared by projects, assets and units within the scope of Corporate Risk Management are brought together by SPCD. In this study, SPCD also adds the "Critical Risks" including the important risks prepared for GAMA Enerji company-wide and the "Risk Dashboard" prepared for them, and the GAMA Enerji Risk Report published every month is created. If the Critical Risks identified by the SPCD Department are more than a certain scope, the first 10 risks are prioritized.

Within the scope of Integrated Management Systems, our risk reports are prepared by our QHSE Department **every six months**. The draft GAMA Enerji Monthly Risk Report is reviewed and evaluated in the meeting held with the SPCD Director, CEO and his assistants and, if necessary, responsible managers. The report is updated in accordance with the decisions taken as a result of the meetings and communicated to our stakeholders through monthly reports.

The report presented to our stakeholders is evaluated, if necessary, in risk assessment meetings held with the Risk Units of our stakeholders, SPCD Director and responsible managers. Our SPCD Director finalizes the report in accordance with the decisions taken at the meeting and with the knowledge of our CEO. The finalized report is signed by the SPCD Director and CEO and forwarded to our partners. A copy of the report is sent by the SPCD Director to CEO and his/her assistants via e-mail. In addition, at the end of each quarter or at periods deemed appropriate by senior management, GAMA Enerji Risk Committee convenes and evaluates the risks. The actions determined at the meeting are recorded in the meeting notes and the basic stages mentioned above are implemented.

*Our risk reports must be prepared monthly for each ongoing investment, asset and related unit, as well as process-based and semi-annual reports within the scope of management systems, and submitted to the SPCD Director by each Risk Officer. All risk reports are reviewed by our SPCD Department, which conveys its opinions and suggestions, if any, to the relevant Risk Officers.*





In terms of environmental sustainability, we calculate the effects of drought and weather conditions separately for each HPP and WPP in which we operate. In addition, within the scope of social sustainability, we ensure that any social conflicts with farmers or potential tensions with the local community regarding water use in the areas where we operate are reported as a risk item.

### Our Perception of Environmental, Social and Governance Risk

Within the scope of sustainability, we include environmental, social and governance issues in our corporate governance and risk management procedure through monthly risk reports. In terms of environmental sustainability, we calculate the impacts of drought and weather conditions separately for each HPP and WPP in which we operate. In addition, within the scope of social sustainability, we ensure that any social conflicts with farmers or potential tensions with the local community regarding water use in the areas where we operate are reported as a risk item. Thus, while contributing to risk management, we integrate the taking of measures to prevent social conflicts that may occur in order to prevent this situation into our processes in terms of corporate governance.

When we examine the sustainability framework on governance, we see that the risk of losing key personnel that will affect our operations in our power plants is reported. With this risk item, we evaluate our corporate governance strategy within the framework of risk reports in order not to lose our personnel.



Lamas III-IV Run-off River  
Hydroelectric Power Plant



SARES Wind Power Plant

In order to determine the possible impacts of climate change, we evaluate the hydrology and wind trends of wind and hydroelectric power plants and assess the situations that may occur. In addition, we evaluate the flood risk in our hydroelectric power plants within the scope of climate change and add it to the risk items. Once these risk items are defined, we apply the steps of analysis, evaluation, preparation of action plans, implementation, reporting, monitoring and auditing.

We analyze risks such as technology-based cyber-attacks under strategic risks. After they are defined like any other risk or opportunity item, we follow the steps of analysis, assessment, preparation of action plans, implementation of action plans, reporting, monitoring and auditing. We review and report the risk assessment and action plans every month through our Information Technologies Department. Our continuous monitoring of the development of risks ensures preparedness and allows us to create action plans as a precautionary measure in case a risk occurs. We continuously work with our Information Technologies Department to improve the company's infrastructure and we pay attention to this issue.

*We review and report the risk assessment and action plans every month through our Information Technologies Department.*





Within the scope of risk management, we, as GAMA Enerji, focus on the assessment of possible deviations in hydrology, wind direction and speed as the primary impacts of climate change on wind and hydroelectric power plants that generate renewable energy.

### Climate Change Risks and Opportunities

Within the scope of risk management, we focus on the evaluation of possible deviations in hydrology, wind direction and speed as the primary effects of climate change on GAMA Enerji's wind and hydroelectric power plants that generate renewable energy. We evaluate the impact of possible deviations in these parameters on production within the framework of long and short-term models by obtaining data verification and data analysis services both within the company and from expert consultants in the field, and we make the necessary plans for business continuity. We prepare action plans in line with model studies for these possible changes.

In addition, we monitor all emissions emitted by our İç Anadolu Natural Gas Combined Cycle Power Plant as a result of production in line with the relevant legislation obligations and report them to the relevant authorities.

For 2021, we have started to prepare our annual carbon footprint report with our newly launched practice within the scope of GAMA Enerji and all our affiliated companies. Based on the results obtained from here, we will continue to implement energy efficiency steps to reduce our emissions in line with both the relevant legislation and the relevant standards.



Gök II Wind Power Plant



### Covid-19 Risk Management

While Covid-19 and the new order it brought afterwards showed that the process of creating and implementing action plans within the scope of risk management should be carried out much more effectively and quickly, it reminded the importance of coordination and communication between the fields and the headquarters. In February 2020, GAMA Enerji defined the pandemic as a risk and established the **"GAMA Enerji Covid-19 Crisis Management Team"**. Our Crisis Management Team has been holding weekly meetings since February 2020 to monitor the course of the pandemic and create action plans. Within the scope of Covid-19, we prepared the **"GAMA Enerji Covid-19 Emergency Response Plan"** and put it into effect in March 2020.

Through the GAMA Enerji Covid-19 Emergency Response Plan, we defined 4 different crisis levels and determined the actions to be taken and carried out precautionary work on the possible effects of the pandemic both in our departments and in the fields. We carried out risk assessment studies such as how many days the power plant could be interrupted by diagnosing more than one of our personnel at the same time and its impact on revenue. We renewed the shift schedule of the operation and maintenance personnel of the assets to minimize contact between personnel, provided all employees with the necessary equipment (such as masks, disinfectants), and prepared the **'Remote and Short-Term Working Procedure'**. According to this procedure, we enabled our employees whose job descriptions and content are suitable for remote and short-term work to start working remotely. Within the scope of remote working and the pandemic, we have carried our meetings into the digital environment. In addition, we have initiated work within the scope of document management and continue to work on moving all documents to the digital environment.

We aimed to create value for our investor relations by moving our work and meetings online. Within the scope of document management, we established a system to digitize all our documents in order to create value with specific projects by evaluating the current situation with our meetings, documents and employees. With the digital transformation, we have made our document management system active and efficient by digitizing all our documents.

*In February 2020, GAMA Enerji defined the pandemic as a risk and established the "GAMA Enerji Covid-19 Crisis Management Team". Our Crisis Management Team has been holding weekly meetings since February 2020 to monitor the course of the pandemic and create action plans.*



## ETHICS MANAGEMENT

We conduct our business processes with the concepts of **justice, fairness, honesty, impartiality** and **responsibility** and we create our values with these concepts.



In the regions where we operate, we do not allow human trafficking, forced labor or similar attitudes and actions, and we subject the units and individuals operating in this field to the necessary provisions.

**W**e communicate and conduct our activities with our partners, employees, stakeholders and customers within the scope of ethical values.

In order to maintain peace in our work environment, we prepare all our processes within ethical frameworks to ensure that everyone is evaluated in an equal and fair environment, and we identify and improve the negative aspects. We ensure that the issue goes to the disciplinary board for people who exhibit inappropriate behavior and we manage the processes to be evaluated.

In the regions where we operate, we do not allow human trafficking, forced labor or similar attitudes and actions, and we subject the units and individuals operating in this field to the necessary provisions. As GAMA Enerji, we adopt the principle of "Zero Tolerance" for all forms of forced labor, slavery and human trafficking. We protect the personal information and other personal rights of our employees and respect the right of resignation of workers and workers who have the right to resign from work, and we apply the necessary procedures fairly upon request.

**With our ethical management approach, we do not allow child labor. We expect our business partners to observe all legal requirements regarding the employment of minors and, if necessary, to take measures in this regard.**

With our ethical management approach, we do not allow child labor. We expect our business partners to observe all legal requirements regarding the employment of minors and, if necessary, to take measures in this regard.

As GAMA Enerji, we define communication resources where our employees, business partners and all other parties outside GAMA Enerji can make their complaints and notifications about conflicts of interest, violations of code of business conducts and illegal practices that have occurred or may occur regarding GAMA Enerji in a confidential and secure manner;

In this context, we use the e-mail address

[seffaf@gamaenergy.com](mailto:seffaf@gamaenergy.com) for Corruption and Bribery reports.

Within GAMA Enerji, we enable anonymous reporting of physical, psychological harassment, sexual harassment, verbal harassment or abuse via the e-mail address [paylas@gamaenergy.com](mailto:paylas@gamaenergy.com). In addition to these, we also use the e-mail address [bildir@gamaenergy.com](mailto:bildir@gamaenergy.com), which is specially allocated for the grievance mechanism, to anonymously forward complaints to the relevant units within GAMA Enerji.

*We define communication resources where they can make their complaints and notifications about conflicts of interest, violations of business ethics rules and illegal practices that they have experienced or may experience regarding GAMA Enerji in a confidential and secure manner.*





# VALUES WE PAY ATTENTION TO IN OUR MANAGEMENT

With our Human Resources Management Policy, GEAŞ aims to comply with the United Nations Universal Declaration of Human Rights, United Nations International Labor Organization Conventions, International Financial Institution Performance Standards, National Labor and Employment Laws and Regulations and local legal rules.

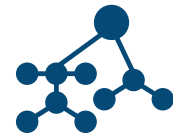
### Human Resources Management Policy

The purpose of our Human Resources Policy is to inform employees about the processes handled within the scope of human resources at GAMA Enerji and all its subsidiaries (collectively "GEAŞ"); to establish, organize and improve employee-manager relations; to develop a system where employees can learn about their working conditions and rights, and at the same time to encourage a fair approach and equal opportunities.

Our policy includes issues such as non-discrimination and supporting equal opportunity, supporting and facilitating women's participation in business life, and raising awareness through events both within our company and subcontractors. As a company, we encourage our employees to voluntarily support our corporate social responsibility projects and support them in continuous learning in line with their own demands.

In addition, we do not tolerate physical, psychological, sexual, verbal harassment or abuse within our company under any circumstances and we ensure that actions are taken swiftly in line with national laws, regulations and internal regulations. We inform our employees about this issue through internal complaint boxes and the e-mail address [paylas@gamaenergy.com](mailto:paylas@gamaenergy.com), which can also enable anonymous reporting.

With these policies, GEAŞ aims to comply with the United Nations Universal Declaration of Human Rights, United Nations International Labor Organization Conventions, International Finance Corporation Performance Standards, National Labor and Employment Laws and Regulations, and local legal rules. We document and communicate working conditions and terms of employment to all GEAŞ employees. Our Human Resources Policy covers all GEAŞ employees, including senior management.



The purpose of our Human Resources Policy is to inform employees about the processes handled within the scope of human resources at GAMA Enerji and all its subsidiaries (collectively "GEAŞ"); to establish, organize and improve employee-manager relations; to develop a system where employees can learn about their working conditions and rights, and at the same time to encourage a fair approach and equal opportunities.

You can access our Human Resources Policy by [CLICKING THIS LINK.](#)

### Quality, Environment, Occupational Health and Safety Policies

As GAMA Enerji, our aim with this policy is to create value for all our stakeholders, to maintain our position among the leading companies in the sector in Türkiye and abroad, and to continue our activities by improving them. The principles we will emphasize in our efforts to achieve this goal are as follows:

- To ensure the continuity of customer and other stakeholder satisfaction,
- To operate in accordance with the requirements of the contract, the relevant legal regulations and standards in force and by fulfilling the applicable requirements of the relevant parties,
- To use resources efficiently, protect the environment and prevent environmental pollution by supporting sustainable resource use with the awareness of "Environmental Awareness",
- To operate in a way to protect the health of employees and ensure occupational safety, prevent injuries and occupational diseases,
- To make continuous improvement through systematic and effective methods to increase quality, environment, occupational health and safety performance,
- Systematically reviewing, eliminating or minimizing hazards, occupational health and safety risks,
- To operate in accordance with the Code of Business Conduct prepared in the light of "GAMA Values" and principles,
- To ensure the sharing of experiences and the continuity of corporate memory; and
- To protect, increase and ensure the sustainability of our organization's human resources, accumulation and financial strength.
- To ensure the participation and consultation of our employees and their representatives, if any, in OHS issues.

In line with these principles, we aim to increase the value added to our employees and the society, eliminate the conditions that harm the environment and provide the working conditions necessary for occupational health and safety. The knowledge and understanding of these principles by all our employees and stakeholders will form the basis for achieving our goals.



As a company, we encourage our employees to voluntarily support our corporate social responsibility projects and support them in continuous learning in line with their own demands.





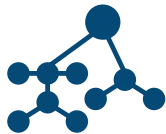
Karacaören I - II Dam Type  
Hydroelectric Power Plant

#### Investment Policy

GAMA Enerji follows an environmentally sensitive investment and operation policy by accepting and declaring to act in accordance with the "Equator Principles" in its domestic and international investments. Equator Principles are the principles accepted by the finance sector under the leadership of IFC (International Finance Corporation), the private sector arm of the World Bank, in project financing, social responsibility and environmental risk management. By adopting these principles, we are committed to eliminate the negative impacts on the socio-economic and natural ecosystem of the environment in which the project is located during the development, construction and operation phases of the project, and to reduce and/or compensate for the impacts that cannot be avoided.

##### Equator Principles:

- Review and categorisation of environmental and social impacts
- Social and environmental assessment
- Applicable social and environmental standards
- Action plan and management system
- Information and participation
- Grievance mechanism
- Independent review
- Covenants
- Independent monitoring and reporting
- Equator Principles Financial Institution (EPFI) reporting



Our Company follows an environmentally sensitive investment and operation policy by accepting and declaring to act in accordance with the "Equator Principles" in its domestic and foreign investments.

**Our goal with the Energy Efficiency Policy is to integrate a systematic approach into our daily lives based on the principles of resource conservation and energy saving, taking into account the priority of human health and safety and the comfort of the working environment.**

#### Energy Efficiency Policy

Our goal with the Energy Efficiency Policy is to integrate a systematic approach into our daily lives based on the principles of resource conservation and energy saving, taking into account the priority of human health and safety and the comfort of the working environment.

Our principles that we will emphasize in our work to achieve this goal:

- To operate in accordance with the relevant legal regulations and standards in force and other requirements followed within the scope of energy consumption, use and efficiency,
- To use resources efficiently, protect the environment and prevent environmental pollution by supporting sustainable resource use with the awareness of "Environmental Awareness",
- To make continuous improvement in energy performance and Energy Management System, and to provide the necessary information and resources to achieve the goals and objectives,
- To support designs to improve energy performance,
- To use energy efficient products and services and to consider human health and safety and environmental impacts in all kinds of materials we use; and
- To minimize the impact of energy production on the environment by promoting energy conservation.

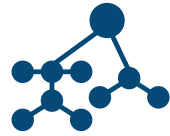
In line with these principles, we aim to increase the value added to society, eliminate conditions that harm the environment and raise awareness of energy saving. The adoption of these principles by all our employees and the knowledge and understanding of our stakeholders will form the basis for achieving our goals.



Gök II Wind Power Plant

*In line with our principles, we aim to increase the value added to society, eliminate conditions that harm the environment and raise awareness of energy saving.*





We are aware that information security is the responsibility of all our employees and that both our organization and our stakeholders may be harmed in case of loss of information or improper and unauthorized use of information.

### Information Security Policy

As GAMA Enerji, we adopt the principle of protecting confidentiality, integrity and all physical and electronic information assets throughout the organization in order to protect the legal compliance and commercial image of the organization's information infrastructure. We are aware that information security is the responsibility of all our employees and that both our organization and our stakeholders may be harmed in case of loss of information or improper and unauthorized use of information.

As GAMA Enerji, our main goals on Information Security are;

- To minimize the threats that may arise from information security by effectively managing the Information Security Management System,
- To comply with all legal regulations and contracts related to information security,
- To systematically manage risks to information assets,
- To continue GAMA Enerji's core and supporting business activities with minimum interruption and
- To improve the Information Security Management System through continuous and systematic evaluation.



Gök II Wind Power Plant

### Forced Labor and its Prevention

Human trafficking, forced labor or slavery is never accepted or practiced by GAMA Enerji. All forms of forced labor, slavery and human trafficking are included in GEAŞ's "Zero Tolerance" principle. GEAŞ does not threaten or force any employee, protects the personal information of its employees and the rights they are obliged to protect, and respects and protects workers who have the right to resign and their right to resign. Employee rights are protected, including issues such as payment of overtime wages and use of leave. GEAŞ adds relevant articles to its contracts with business partners in order to ensure that these principles are also followed by the business partners it works with.

### Child Labor and Prevention of Child Labor

Under Türkiye law, it is forbidden to employ children under the age of fifteen, unless otherwise stipulated by law. GEAŞ never accepts or practices child labor. The use of child labor is strictly prohibited. Business partners must observe all legal requirements regarding the employment of minors. All forms of child labor are included in our "Zero Tolerance" policy. GEAŞ adds relevant clauses to its contracts with its business partners in order to ensure that the business partners it works with comply with these principles.

In summary, GEAŞ will not, under any circumstances, employ employees below the minimum age for employment as defined by national laws. As internship training programs are outside the scope of the above explanations, GEAŞ supports the development of internship training programs, but interns are never assigned to high-risk jobs or areas and are never allowed to enter these areas alone.

*In line with our principles, we aim to increase the value added to society, eliminate conditions that harm the environment and raise awareness of energy saving.*

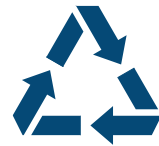


# OUR SUSTAINABILITY POLICY

As GAMA Enerji, our aim is to leave a better world and a better nature to our future generations.

As GAMA Enerji, our goal is to leave a better world and a better nature to our future generations by setting environmental, social and corporate governance targets with the participation of all our stakeholders while carrying out our activities in all sectors in which we operate, to maintain our position among the leading companies in the sector in Türkiye and abroad with a sustainable company understanding and to continue to improve our activities.

The principles we adopt in all our business processes to achieve this goal are given below under 3 main headings.



As GAMA Enerji, our goal is to maintain our position among the leading companies in the sector in Türkiye and abroad with a sustainable company approach and to continue to develop our activities.



Karacaören I-II Dam Type  
Hydroelectric Power Plant



Çakırlar Run-off River  
Hydroelectric power plant

## 1 ENVIRONMENT

- To use our resources efficiently, reduce waste generation, protect the environment and prevent environmental pollution by supporting sustainable resource use with the awareness of "environmental sensitivity",
- To create efficient working areas by constantly following energy efficiency studies in all of our fields of activity and by realizing developing technology and infrastructure changes to increase efficiency,
- To minimize the impact of energy consumption on the environment by promoting energy conservation,
- To prefer "Environmentally Friendly" products and services during activities,
- To emphasize renewable energy-based electricity generation in the energy sector,
- To ensure the efficient use of water knowing that there will be no future without water, to make carbon footprint calculations within the scope of combating climate change, to have them verified and monitored.



## 2 SOCIAL

- To develop social projects that will contribute to the social and economic development of the society and local stakeholders in the fields of activity, local employment, and to create opportunities for cooperation,
- To continuously improve the working environment to make it more efficient and to increase the rate of "happy employees" by adopting different working models, keeping employee engagement and employee welfare at the highest level,
- To prevent all kinds of discrimination in the workplace, being fair and equal in remuneration and performance evaluation approach,
- To produce projects to increase the number of female employees in all our fields of activity and to adopt an egalitarian attitude in this regard,
- To support the personal development of employees and making a positive contribution to increasing the rate of happy employees,
- To support the participation of stakeholders in decision-making processes, taking into account their wishes and expectations,
- To ensure that the sustainability perspective becomes a corporate culture for our employees and all stakeholders and that awareness-raising activities are carried out continuously,
- To realize trainings and projects that will raise awareness among all stakeholders, starting with our employees.



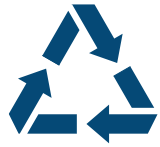
## 3 TRANSFORMATION, DEVELOPMENT AND GOVERNANCE

- To ensure the continuity and security in energy supply with a balanced energy generation portfolio,
- To protect the health and safety of our employees, providing them with a suitable working environment, equal opportunities and investing in their development,
- To operate in accordance with the Code of Business Conducts prepared in the light of "GAMA Values" and principles,
- To protect and increase GAMA Enerji's human resources, know-how and financial strength and to ensure their sustainability,
- To enable the use and development of innovative technologies that will contribute to sustainable development at every stage of our activities,
- To be transparent, to comply with basic business ethics and fighting corruption,
- To make it easier for our customers to access electricity and support services by prioritizing customer satisfaction,
- To regularly publish a sustainability report in compliance with international standards covering all our activities.



In line with these principles, we aim to increase the value added to our employees and society and to support the development of our country and the world in a more sustainable manner. In addition, the knowledge and understanding of these principles by all our employees and stakeholders will form the basis for achieving our goals.





In order to prioritize and manage stakeholder expectations and identify the stakeholders most and least affected by our activities, we conducted stakeholder prioritization with an internal working group. In the study, we applied the standard of the GRI organization that we use for sustainability reporting.

### Relations with our Stakeholders

We build our communications with our stakeholders on solid foundations in order to make our sustainability activities in the environmental, social and governance areas more efficient and stronger. We carefully examine the suggestions and recommendations we receive from our stakeholders through the dialogs we have held, down to the finest detail.

In order to materialize and manage stakeholder expectations and to identify the stakeholders most and least affected by our activities, we conducted stakeholder materialization with an in-house working group. In the study, we applied the standard of the GRI organization, which we use for sustainability reporting. According to the results of the study, stakeholders are grouped into 3 groups according to the degree to which they are affected by the activities of the organization and affect corporate success. The priorities of stakeholders depend on issues such as collaborations and the current conjuncture and may change over time.



### Stakeholder Dialogue and Material Issues

The "Sustainability Materialization and Stakeholder Analysis" determined in line with the views of our stakeholders forms the basis of our sustainable business strategy. In addition to the surveys conducted with internal and external stakeholders, we also took into account national and international trends in determining our material issues. In the study, we followed the basic standard of the GRI, the most widespread and widely accepted organization in sustainability reporting.

According to the results of the survey, in which the strategic importance of the material issues for the organization and their importance for stakeholders were evaluated and scored together, we have shown the 12 most prominent issues and all of the evaluated issues in our materiality matrix.

*The "Sustainability Materialization and Stakeholder Analysis" determined in line with the views of our stakeholders forms the basis of our sustainable business strategy.*







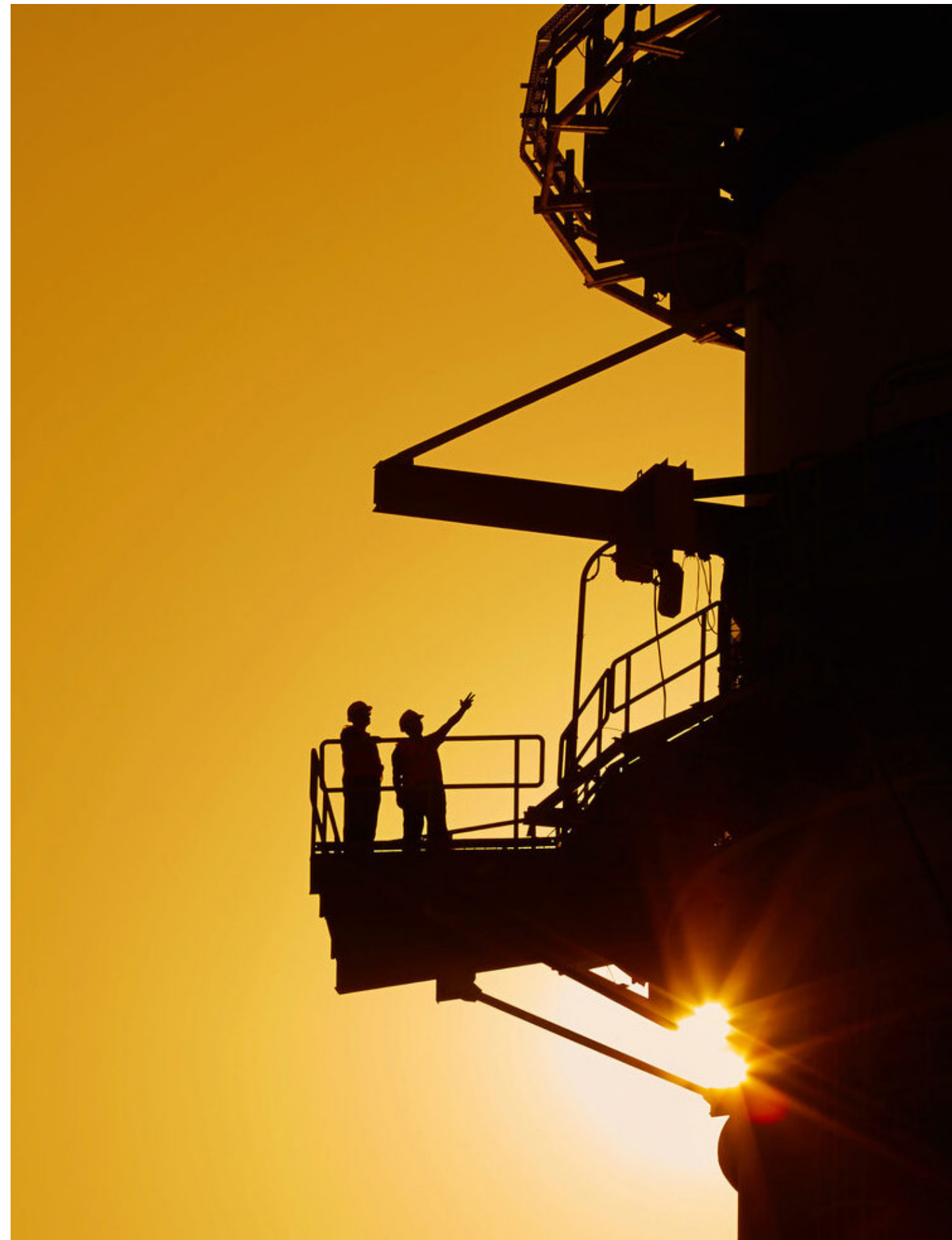
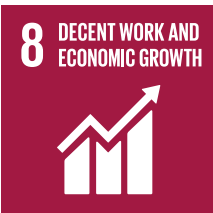
# OUR CONTRIBUTION TO SUSTAINABLE DEVELOPMENT GOALS

- Supporting women's active participation in business life and all areas of life and implementing practices that facilitate women's participation in business life
- Conducting awareness-raising trainings to increase the awareness of our employees and subcontractors
- Preventing gender discrimination in promotions through a gender-neutral and performance-based salary increase policy
- Supporting and encouraging women employees to take part in managerial positions within the scope of their career goals



- Investing in wind and similar clean energy sources to ensure easy access to affordable energy
- Expanding infrastructure and upgrading technology to provide clean energy
- Contributing to the fight for climate by introducing the International Green Energy Certificate (I- REC) to our customers and stakeholders

- Contributing to the development of our employees in their fields by providing training and seminars, and ensuring their social satisfaction by organizing motivating activities
- Making an evaluation with an equal approach without discrimination with our logic of equal pay for equal work and realizing a comprehensive and fair work within our remuneration policy
- Realizing our 2021 economic growth with the largest financial restructuring of the year and striving to produce projects that are beneficial to society and add value Lamas III-IV Run-off River Hydroelectric Power Plant







Lamas III-IV Run-off River  
Hydroelectric Power Plant



- "Do More With Less" -Triple Bottom Line project, where we evaluate GAMA Enerji business strategy in 3 dimensions as **people, planet** and **company** profit
- Conducting studies in which the effects of consumption habits on environmental pollution and climate change are evaluated and actions are taken as a result of these evaluations



- Establishment of our Sustainability Policy
- "Do More With Less"-Triple Bottom Line project
- Using our resources efficiently, reducing waste generation, protecting the environment and preventing pollution by supporting sustainable resource use with the awareness of "environmental awareness"
- Ensuring continuity and security in energy supply with a balanced energy generation portfolio
- Protecting the health and safety of our employees, providing them with a suitable working environment and equal opportunities, and investing in their development
- Operating in accordance with the Code of Business Conduct prepared in the light of "GAMA Values" and principles
- Protecting and increasing GAMA Enerji's human resources, know-how and financial strength and ensuring their sustainability
- Minimizing the environmental impact of energy production by promoting energy conservation
- Facilitating our customers' access to electricity and support services by prioritizing customer satisfaction



Sarës Wind Power Plant



# OUR SUSTAINABILITY ACTIVITIES

We strive to contribute to sustainability and protect our environment, and we build our projects and work on solid foundations by setting goals for ourselves.



We work by considering sustainability and environmental issues in our internal structure and collaborations. We multiply our support with the work we do and work to leave a solid foundation for the future.

Sustainability has become our indispensable building block for the safety and continuity of future generations. We work to contribute to sustainability and protect our environment, and we build our projects and activities on solid foundations by setting goals for ourselves. We endeavor to consider sustainability and environmental issues in our internal structure and collaborations. We multiply our support with the work we do and work to leave a solid foundation for the future.

**Do More With Less Project - Triple Bottom Line**  
In these days when climate change and environmental



Triple Bottom Line  
“Kaino”



problems are of high importance in our country and in the world, we have implemented our **"Do More With Less"** project, which we started on a voluntary basis within the company with our awareness approach to environmental pollution and climate change issues within the scope of environmental sustainability. With our **"Triple Bottom Line"** group, which is one of the pillars of our Do More With Less project, we carried out studies in which the effects of consumption habits, especially GAMA Enerji employees, on environmental pollution and climate change were evaluated and actions were taken as a result of these evaluations. We evaluated our GAMA Enerji business strategy in 3 dimensions: **people, planet** and **company** profit. In this context, we prioritized contributing to the protection of the environment and nature by changing consumption habits. By the end of 2022, we aim to reduce the amount of waste, increase the awareness of our employees on environmental and climate change issues, and update our sustainability practices, procedures and way of doing business in these areas thanks to the actions we will take with this project we started in 2021.

*Within the scope of environmental sustainability, we launched our "Do More With Less" project, which we initiated on the basis of internal volunteering with our awareness approach to environmental pollution and climate change.*





By the end of 2022, we aim to reduce the amount of waste, increase the awareness of our employees on environmental and climate change issues, and update our sustainability practices, procedures and way of doing business in these areas thanks to the actions we will take with this project we started in 2021.



The actions we have taken so far to achieve the goals we have set by 2022 are as follows;

- We conducted a survey to measure our employees' level of knowledge on sustainability and identified our strengths and weaknesses based on the survey results.
- For the baseline analysis, we purchased weighing devices and ensured that the total amount of waste is measured before the waste undergoes any treatment.
- Thanks to Envision (Electronic Document Management System), we published pop-up notifications that appeared on our employees' computer screens. With the help of the notifications, we raised awareness on issues such as energy saving, recycling and water saving.
- We started collecting our waste in one place on each floor, separating it into plastic, metal, paper and glass.
- On November 11th, we started a pilot project where we placed recycling bins on one floor only, and we applied them to all floors where we are located, including the procedure that entered into force on October 9th.
- On December 15, we organized a Zero Waste Training for all our employees.
- As of December 20, we completely removed the garbage bins at each desk and instead of garbage bins, we directed our employees to the colored waste bins arranged according to the waste to separate the waste.
- In order to reduce paper use and paper waste within our company, we purchased new printers with preview capability.

To reach our 2022 targets, we have made progress with the actions taken so far, but we are working on the actions to be taken in order to fulfill our responsibilities towards the environment and nature and to raise awareness in the field of sustainability in all operations of our company. Our materialized works in this regard are;

- Creating an in-house platform to encourage the use of second-hand products,
- Providing training to employees on carbon footprint,
- Raising awareness on which channels to apply when environmental pollution is detected,
- Ensuring that suggestions for environmentally and human friendly products are shared through GAMA Connect, GAMA Enerji's social media platform, and/or e-mail groups,
- Raising awareness and providing opportunities for recycling waste oils,
- Providing thermos and glass cups to employees to reduce the use of plastic bottles and paper cups,
- Providing employees with cloth bags that they can use in their social lives,
- Following the trainings and actions, conduct a second survey to measure employees' perspectives on sustainability,
- Creating a "Lessons learned" document based on the results of the second survey.

*We are working on the actions to be taken to achieve the goal of our project and to fulfill our responsibilities towards the environment and nature in all operations of our company and to raise awareness in the field of sustainability.*







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# ENVIRONMENTAL PERFORMANCE





By using renewable energy resources as raw materials in eight of our nine power plants, we reduce our carbon emissions in energy production and continue our efforts to play an active role in the fight against climate change.

**A**s GAMA Enerji, we have been striving to meet the energy needs of the developing society in a reliable and sustainable manner since our establishment. In addition to our long-standing investments in new technologies and employee development activities, we continue to provide the energy necessary to improve lives in the areas where we operate while managing climate change risks.

We are also developing our renewable energy generation resources for clean and environmentally friendly energy production. By using renewable energy sources in eight of our nine power plants, we measure our carbon emission rate in energy production and continue our efforts to play an active role in the fight against climate change.

While we comply with local regulations in the activities we carry out at our power plants, we also meet the expectations and standards of international organizations. Therefore, in addition to our compliance with Turkish Environmental Legislation, we are also guided by the sustainability and performance standards published by the International Finance Corporation, one of our partners. We also meet the international standards published by the International Finance Corporation and the European Bank for Reconstruction and Development (EBRD), which are among the leading international organizations in this field. Every year, we publish regular reports on meeting the relevant international standards, covering our head office and power plants. In addition, we successfully complete the annual audits conducted by IFC and EBRD and through independent audit firms.

With the ISO 14001 Environmental Management System implemented at our headquarters and power plants, we consider activities in processes such as material procurement, production, raw material, resource and service consumption from the perspective of processes serving the whole. We carry out activities to manage risks in order to prevent negative environmental impacts arising from our operations, if possible, and minimize them if not. In addition, our environmental management does not only consist of risk perception, but also includes the perspective of evaluating opportunities and being a pioneer and an example.

With the awareness of "Environmental Awareness", we work to use energy and natural resources efficiently in order to support sustainable resource utilization. We work to improve recovery rates by taking measures to reduce waste generation, and we continuously evaluate our environmental performance in this context. Every year, we strive to do more than expected by setting goals for ourselves in order to improve and move forward.

With the ISO 50001 Energy Management System, which is being implemented at our headquarters and power plants, we evaluate the efficiency of our energy consumption, which is currently measured and consumed by the installed systems in order to sustain our operations, and our fossil fuel consumption such as gasoline, natural gas and diesel fuel by measuring and managing them more effectively. In addition to using high technology to increase energy efficiency, we aim to make continuous improvements in our systems by developing projects.

*With the awareness of "Environmental Awareness", we work to use energy and material resources efficiently in order to support sustainable resource utilization. We work to improve recycling rates by taking measures to reduce waste generation, and we continuously evaluate our environmental performance in this context.*



# GREENHOUSE GAS EMISSIONS

As GAMA Enerji, we contribute to meeting the increasing energy demand of a growing global population.

We realize carbon certification and sales in our renewable energy investments. In this way, the greenhouse gas emissions we saved amounted to 115,748 tCO<sub>2</sub>e in 2021 and we contributed to the environment equivalent to the clean air provided by 578,740 trees.

As stated in GAMA Enerji's Sustainability Policy, "We recognize the climate risks posed by direct and indirect greenhouse gas emissions from the energy sector and support efforts to mitigate these risks." In this context, we are closely following the Paris Agreement commitments, the European Green Deal, the implementation of the Carbon Tax at the Border, progress that may occur such as the development of carbon markets and other global targets to reduce energy sector emissions. The fact that we are one of the first sectors to be regulated under the European Green Deal makes us follow the issue even more closely. In order to combat climate change, we make improvements to reduce greenhouse gas emissions to minimize our company's impact on the environment while conducting our operations. These include technological investments to ensure low-emission energy supply and investments in renewable energy assets.



It is important to prevent the contribution of pollutant air emissions to air pollution and not to exceed the limits that would pose a danger to life.

As GAMA Enerji, we aim to;

- Identify, evaluate and record our greenhouse gas emissions that may arise as a result of our activities and services,
- Identify risky and problematic points in our carbon management and eliminating the negativities,
- Calculate the impact of our activities on climate change,
- Create a Carbon Management Plan,
- Contribute to raise awareness on climate change, energy efficiency and sustainability,
- Ensure transparency regarding our organization's resource consumption, emissions and energy consumption,
- Identify emission reduction potential,
- Raise awareness within the organization.

In our world, where we aim to limit climate change to prevent it and even target net zero greenhouse gas emissions in the 2050s, we see the first step in managing our impact as having our greenhouse gas inventory calculated in accordance with international standards. For this reason, we had our 2021 carbon footprint inventory calculated by an expert company in accordance with the current version of the ISO 14064 Standard for Monitoring, Accounting and Reporting of Greenhouse Gas Emissions, the relevant standard of the International Organization for Standardization (ISO). Our greenhouse gas inventory total for all categories calculated according to ISO 14064-1: 2018 version, covering all our facilities and management buildings, was 1,971,624.29 tons CO<sub>2</sub>e.

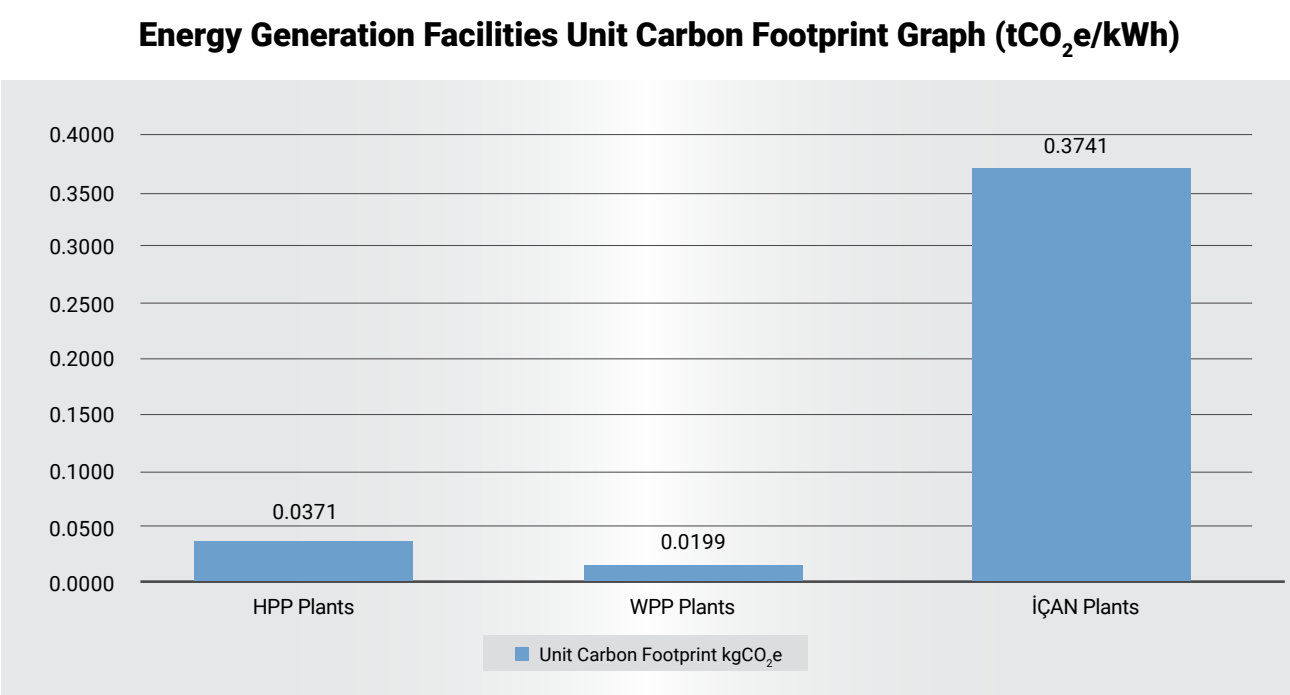
Between January 1 - December 31, 2021, we present our calculated plant/office-based carbon footprint figures in the table below:

Tablo: 2021 Greenhouse gas emission values

FACILITY / LOCATION NAME	Production/ Service Unit	CATEGORY 1+2		
		Production Quantity	Total Emission tCO <sub>2</sub> e	Unit Carbon Footprint kgCO <sub>2</sub> e
HPP Plants	kWh	185,275,061	6,866.63	0.0371
WPP Plants	kWh	421,958,616	8,397.48	0.0199
İÇAN Plants	kWh	4,902,555,520	1,834,241.53	0.3741
Disi Plant	m³	103,800,000	121,901.14	1.1744
Istanbul Office	No Production	No Production	32.15	No Production
Ankara Head Office	No Production	No Production	185.36	No Production



In addition, as a result of our studies, we share our carbon emission values for unit kWh electricity generation according to electricity generation types in the graph below.



Our unit carbon footprint of energy production facilities is 0.3357 kgCO<sub>2</sub>e/kWh based on the six categories specified according to ISO 14064-1, which are generated in line with the activities of all facilities and locations of GAMA Enerji.

The energy sector is in constant motion to meet the increasing energy demand of a growing global population. As GAMA Enerji, we are committed to supporting efforts to reduce the risk of climate change by playing an important role in meeting the energy needs of society, as stated in our Company's sustainability policy.

In order to minimize the impact on the environment while conducting our activities, we carry out improvements to reduce all greenhouse gas emissions realized by our company. In the fight against climate change, our efforts to reduce our costs and greenhouse gas emissions through technological investments to ensure safe and efficient energy supply are also included.

We realize carbon certification and sales from our renewable energy investments. In this way, the greenhouse gas emissions we saved amounted to 115,748 tCO<sub>2</sub>e in 2021 and we contributed to the environment equivalent to the clean air provided by 578,740 trees.

*Our greenhouse gas emission inventory calculation was carried out according to the ISO 14064-1:2018 Monitoring, Calculation and Verification of Greenhouse Gas Inventory standard, which is the latest version of the relevant International Standards Institute (ISO) standard and whose use will become mandatory by the end of 2021.*

Tablo:

Plant Name	Emissions Saved	Tree Equivalent of Savings
	(tCO <sub>2</sub> e)	(pcs)
Lamas HPP	17,815	89,075
Çakırlar HPP	30,972	154,860
Sares HPP	66,961	334,805
TOTAL	115,748	578,740

As a country with a developing economy, our country needs a certain level of electrical energy to be provided on a regular basis. In order to meet this demand, to increase the security of energy supply and the financial resilience of your organization, we include various types of renewable and non- renewable electricity power plants in our portfolio. In order to ensure the security of energy supply, our portfolio also includes İÇAN Power Plant, a Natural Gas Combined Cycle Power Plant with an installed capacity of 853 MW. Therefore, close to 95% of our direct emissions from combustion for 2021 originate from İÇAN power plant. In order to reduce our emissions per unit of electricity generation, we invest in energy generation plants such as HPPs and WPPs in our portfolio, in addition to the superior technology we use at İÇAN power plant and the efficiency improvement efforts we continuously carry out.

Air Emissions

Energy, one of the most important parameters of economic development, has been the biggest driving force in improving the level of life of the society and increasing the rate of development. However, pollutants such as CO<sub>2</sub>, SO<sub>2</sub>, NOx, particulate matter, etc. can emerge during the conversion and consumption processes of fossil fuels into energy. Although the amount of similar pollutants emitted to the atmosphere from natural sources is actually much higher, the concentration of these emissions can cause negative effects on the environmental fabric, especially around dense residential centers and industrial zones. In this context, it is important to prevent the contribution of pollutant air emissions from fossil fuel energy facilities to air pollution and to monitor them to prevent exceeding the limits that would pose a danger to life. Therefore, we meticulously monitor the air emissions generated as a result of our activities and take great care to ensure that the values are within the parameters determined by legal regulations.

*We meticulously monitor the air emissions resulting from our operations and take great care to ensure that the values are within the parameters set by legal regulations.*

Tablo: Air emission intensity (tons/MWh production)

İÇAN-Air Emissions (tons)	2021	2020	2019
NOx	630	562.1	513.4



# ENERGY MANAGEMENT

Training, auditing, measurement, monitoring, planning and implementation activities are among the activities carried out to ensure the efficient use of energy resources and energy. In this context, our policies, procedures and instructions have been prepared.

We regularly continue energy management activities under the leadership of our Energy Management System Management Representative in order to carry out all kinds of work related to the requirements of the ISO 50001: 2018 Standard.



Since 2019, within the framework of the ISO 50001:2018 Energy Management System Standard, we have been systematically carrying out all the work and continuing our activities to ensure improvements by evaluating the performance of the energy management system by using a process-based approach, saving energy, reducing energy costs and creating processes and systems that promote environmental awareness, evaluating the performance of the energy management system with the aim of sustainability and continuous improvement of this created structure.

As GAMA Enerji and all of our assets, we were awarded the ISO 50001: 2018 Energy Management System certificate in July 2019. Since 2019, we have been systematically carrying out all the work and continuing our activities to create processes and systems that encourage energy saving, reduction of energy costs and environmental awareness by using a process-based approach within the framework of the ISO 50001: 2018 Energy Management System Standard, to ensure improvements by evaluating the performance of the energy management system with the aim of sustainability of this created structure and continuous improvement.

Training, auditing, measurement, monitoring, planning and implementation activities are among the activities carried out to ensure the efficient use of energy resources and energy. In this context, we have prepared our policies, procedures and instructions. We regularly continue energy management activities under the leadership of our Energy Management System Management Representative in order to carry out all kinds of work related to the requirements of the ISO 50001:2018 Standard. In addition, we provide training at least twice a year to inform and raise awareness of all employees about energy efficiency.

We share information on the energy consumption of our assets with you.

Tablo: Energy Consumption

ASSET ENERGY PARAMETERS (GJ)	2021	2020	2019
HPP Energy Consumption	5,697	6,300	6,372
WPP Energy Consumption	3,325	3,467	4,205
İÇAN Energy Consumption	29,013,246	25,410,418	18,254,210
External Energy Consumption	1,105,702-	1,059,474	1,073,696
<b>TOTAL ENERGY CONSUMPTION</b>	<b>30,127,969</b>	<b>26,479,660</b>	<b>19,338,483</b>
*Total Electricity Generation	19,835,241	18,237,795	13,743,348
*Energy Consumption per Production	1.4632	1.3938	1.3290

\* Since Disi is not an electricity generation power plant, it is not included in the related values.





## Emerging Markets and Technologies “GASS”



### Do More With Less - New Technologies, New Resources and Emerging Economies

With our "New Technologies, New Resources and Emerging Economies" group, which is another pillar of our "Do More With Less" project that we initiated on a voluntary basis within the company, we started our studies on Battery Storage Systems in order to store energy efficiently and to avoid dependence on external suppliers. Within the scope of this study, we first got to know this technology and scanned the relevant technical infrastructure and legislation for the use of this technology within GAMA Enerji. Then, we prepared an action plan related to our work and started to implement them. Battery storage technologies are systems that have gained importance in recent years as they can balance the production fluctuations experienced during transmission from renewable energy sources to the grid. Battery storage systems, which can be simply defined as the storage of excess energy in a battery through electrochemical coating, also have promising application areas for ancillary services such as primary frequency control and black-start. The main areas where battery storage systems can be used are as follows:

1. Frequency Control
2. Operational Resource
3. Load Tracking and Load Shifting
4. Long Term Storage



İç Anadolu Natural Gas  
Combined Cycle Power Plant



With our "New Technologies, New Resources and Emerging Economies" group, which is another pillar of our "Do More With Less" project, we started our work on Battery Storage Systems to store energy efficiently and to avoid dependence on external suppliers.

*Battery storage technologies are systems that have gained importance in recent years as they can compensate for generation fluctuations during transmission from renewable energy sources to the grid.*

*Integrating a battery storage system in a hybrid plant consisting of a WPP and a SPP will contribute to reducing generation losses due to power limitation when both plants are operating at full power and license capacity is exceeded.*

Integrating a battery storage system in a hybrid plant consisting of a WPP and a SPP will contribute to reducing generation losses due to power limitation when both plants are operating at full power and license capacity is exceeded. In such cases, excess electricity can be stored in the battery and sold when production decreases. At GAMA Enerji, the main reason why we are working on the battery storage system is to store the energy generated from the production of our assets, especially in wind power plants, to reduce the imbalance costs in our power plants compared to other energy storage systems, to store the energy during off-peak hours with low prices and to distribute the energy during peak hours with high prices. Furthermore, as stated in the Electricity Market Balancing and Settlement Regulation, in the event of an imbalance, a margin loss of at least 3% per MWh occurs. While the maximum MCP for December 2021 is TRY 1,217.00, as of January 2022, this 3% margin loss corresponds to approximately TRY 36.5/MWh when the maximum DAM price is TRY 1,345.

Another important reason why we attach importance to battery storage systems is to reduce our dependence on Energy-pool, which manages our company's energy imbalance, and to benefit from the price differences in intraday imbalance management with the battery storage system to be installed. In addition, as a long-term goal, we plan to enable our wind power plants to participate in the Primary Frequency Control (PFC) ancillary service and generate additional revenue by gaining a deep understanding of the technology and acquiring the necessary know-how.





As GAMA Enerji, we aim to meet new technologies and start-ups, provide new resources and create value by participating in emerging economies with this work we carry out within the scope of the "Do More With Less" project. The actions we have taken so far for this work to reach its goal are as follows;

- We evaluated the power plants in our portfolio and identified the most suitable power plant for battery storage system integration. Since SARES WPP has an existing hybrid power plant project, we chose SARES WPP for our pilot project, as a solar power plant can be installed within the license area of the asset,
- In order to understand how the battery storage system will be integrated, we have reviewed the Regulation on Energy Storage in the Electricity Market with our group members. Meanwhile, with our other group members, we continued to investigate the technical and economic aspects of battery storage systems and other regulatory obligations that may affect the project,
- We have determined a preliminary system configuration according to the requirements set out in the Regulation on Energy Storage in the Electricity Market,
- We have also started analyzing SARES WPP's past hourly production data to determine the optimal battery storage capacity and we are continuing our work on this issue.

The actions we, as GAMA Enerji, will take in 2022 for this work are as follows;

- To complete our analysis to determine the capacity of the battery system,
- To obtain quotes from battery manufacturers to determine the capital cost, based on capacity and other technical parameters such as loading/unloading time,
- To initiate a feasibility study with this information,
- To ensure that the process is supported by consultancy firms.

*As GAMA Enerji, we aim to meet new technologies and start-ups, provide new resources and create value by participating in emerging economies with this work we are conducting within the scope of the "Do More With Less" project.*



## WATER AND WASTEWATER MANAGEMENT

**At GAMA Enerji, we use water in our production facilities. We are working on good practices to reduce the amount of water withdrawn and to reuse and incorporate water into production processes.**



As part of our sustainability efforts, we regularly monitor our performance in water and wastewater management as a result of the actions we have taken to use resources efficiently and reduce the pollution load on water resources.

**A**s part of our sustainability efforts, we regularly monitor our performance in water and wastewater management as a result of the actions we have taken to use resources efficiently and reduce the pollution load on water resources. This year, as every year, we have realized and continue to realize our investments by considering the needs of the environment and future generations.

We maintain all drinking and potable water equipment and installations in our power plants and fix malfunctions as soon as possible. We also provide technical support to Karacaören Village School, Mosque and Mukhtar's Office to ensure that water consumption is kept at an optimum level. We installed water to the power plant building from the new water line built in Kabaca Village.

This year, as every year, we have realized and continue to realize our investments by considering the needs of the environment and future generations.



Lamas III-IV River Type  
Hydroelectric Power Plant



At GAMA Enerji, we aim to minimize our impact on the environment by reducing waste, fresh water withdrawal and emissions, as well as protecting biodiversity. Through our environmental protection measures and management systems, we contribute to SDG 6 "Clean Water and Sanitation", SDG 7 "Affordable and Clean Energy", SDG 12 "Responsible Consumption and Production" and SDG 13 "Climate Action". Environmental protection activities are moving rapidly with global trends. In order to comply with global standards, we aim to meet applicable laws, regulations and stakeholder expectations with the help of our Environmental, Health and Safety (EHS) management systems. Our environmental management systems are based on the principles and elements of the international ISO 14064 and ISO 14046 standards or energy audits according to national legislation. The aim of these systems is to keep carbon and water footprint under control. While water footprint management is an important issue for GAMA Enerji, we aim to carefully manage the use of fresh water in our operations and the impact of our projects on water resources in the surrounding areas. To facilitate the assessment of water-related impacts, we aim for water management and efficient use of water with ISO 14046 Water Footprint Standard certification to help us efficiently assess water risks down to the local level.

**Tablo:** Total Water Withdrawal Data

FACILITY / OFFICE	Withdrawn Water Source	Water Withdrawal by Source
HPP	Total surface water withdrawn (Dam/River etc.) (In-Cycle Flow /	668,771,897
HPP	Well Water	660
HPP	Groundwater taken from the mains	890
WPP	Water Tanker	727
İÇAN	Total surface water withdrawn (Dam/River etc.)	285,006
Disi	Total groundwater withdrawn	103,914,872
Istanbul Office	Groundwater taken from the mains	229
Ankara Office	Groundwater taken from the mains	1,143
	<b>TOTAL</b>	<b>772,690,417</b>

In addition to the activities we carry out for the use of water resources, we also carry out significant activities for the control of wastewater.

**Tablo:** Total Water Discharge Data

FACILITY / OFFICE	Withdrawn Water Source	Water Withdrawal by Source
HPP	Wastewater sent to sewerage / other organizations for use	574
WPP	Wastewater sent to sewerage / other organizations for use	120
İÇAN	Industrial Waste Water	188,952
İÇAN	Sewerage	3,632
Disi	Sewerage	136
Istanbul Office	Sewerage	231
Ankara Office	Sewerage	1,156
	<b>TOTAL</b>	<b>194,803</b>

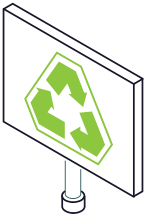


Karacaören I-II Dam Type  
Hydroelectric Power Plant



# WASTE MANAGEMENT

Our waste management, which we carry out in line with our Environmental Policy and in compliance with the relevant laws, is one of the important components of our environmental sustainability approach.



We ensure the recycling of hazardous and non-hazardous wastes arising from our operations in the periods specified in the Waste Management Regulation, while improving our processes with innovative technologies to reduce resource use and waste generation.

Sustainable waste management is the most important part of the circular economy. It is an approach that aims to reduce the consumption of limited resources through a take-use-recycle or reuse model as opposed to a take-use-throw model. Our waste management, which we carry out in line with our Environmental Policy and in compliance with the relevant laws, is one of the important components of our environmental sustainability approach. We ensure the recycling of hazardous and non-hazardous wastes arising from our operations in the periods specified in the Waste Management Regulation, while improving our processes with innovative technologies to reduce resource utilization and waste generation. We manage our operations in accordance with OHS and Environmental Policies and realize our activities with our Zero Waste approach. We reduced waste generation as much as possible by separating waste at source. We manage waste by targeting zero waste implementation at all power plants. Batteries, fluorescent lamps, car batteries and toner cartridges are classified as hazardous waste. Plastic, metal and glass wastes are recycled as non-hazardous waste.



Tablo: Total Hazardous and Non-Hazardous Waste

WASTE (TON)	HAZARDOUS WASTE			NON-HAZARDOUS WASTE		
	Recycling	Reuse	Disposed*	Recycling	Reuse	Disposed*
WPP	0.032		8.416		3.190	1.035
HPP	0.007		0.084	0.151	0.472	0.851
İÇAN	0.057	0.115	3.750	2.075	2.915	28.93
Disi						1.590
TOTAL	0.096	0.115	12.25	2.226	6.577	32.406

Table notes

\* We have taken receipts from authorized recycling companies and MoTAT entries into account in calculating the amount of waste disposed.

**COMMENT:** In 2021, we recovered and disposed of 53.67 tons of waste. We reduced waste generation by introducing 8.80 tons of hazardous waste through recycling and reuse and 9.01 tons of non-hazardous waste through recycling and reuse.



## ZERO WASTE



As a result of our work throughout 2020, we were entitled to receive the "Basic Level Zero Waste Certificate".



In 2021, we completed our work for all our power plants within the scope of industrial facilities included in the Annex-2 List of the EIA Regulation, made the applications within the legal period, and were entitled to receive the zero waste certificate in all our power plants.

As a result of the work we carried out throughout 2020 at our İç Anadolu Natural Gas Combined Cycle Power Plant in Kırıkkale province, one of the GAMA Enerji power plants, we were entitled to receive the "Basic Level Zero Waste Certificate". In 2021, we completed our work for all our power plants within the scope of industrial facilities included in the Annex-2 List of the EIA Regulation and made the applications within the legal period, and we were entitled to receive the zero waste certificate in all our power plants. We started to report all our wastes generated within the scope of the relevant regulation to the legally determined online notification system.



İç Anadolu Natural Gas  
Combined Cycle Power Plant

## BIODIVERSITY



The protection of biodiversity in the areas where we operate is also among our priorities and we continue to take measures and actions in this direction.



We create joint activity areas with nature conservation branch directorates, the Ministry of Agriculture and Forestry, Directorate General of Nature Conservation and National Parks.

Biodiversity is the variety of life forms found in an ecosystem, biome or the entire Earth. All the elements that make up biodiversity interact with each other.

Within the scope of our sustainability efforts that aim to protect the environment, people and nature, the protection of biodiversity in the areas where we operate is among our priorities and we continue to take measures and actions in this direction. With the studies we carry out, we establish interactions not only within our own organization, but also to raise awareness of the people living in these regions. We create joint activity areas with Nature Conservation Branch Directorates, Republic of Türkiye Ministry of Agriculture and Forestry, Directorate General of Nature Conservation and National Parks.

Within the scope of all these activities, the activities and collaborations we have carried out from 2011 to 2021 are listed below:



*Biodiversity is the variety of life forms found in an ecosystem, biome or the entire Earth. All the elements that make up biodiversity interact with each other.*

- We realized a Memorial Forest Project consisting of 28,400 tree saplings in Manisa/Akhisar/Doğankaya.
- We donated 400 olive saplings and 200 tree saplings to the Manisa Çevkor event.
- We planted 2,000 pistachio pines in Kayacık village and 12,000 pistachio pines on forest land on Foça road.
- Together with the Forestry and Nature Conservation Branch Directorates, we planted pine, linden and carob trees.
- We have built a remote life water monitoring system from our regulator in order to maintain natural life and protect our biodiversity.
- We participated in the seminar organized by Mersin Nature Conservation Branch Directorate to prevent bio-trafficking.



- Within the scope of the Anatolian Sweetgum Tree Nature Conservation Area located on the left coast of the Karacaören 1 HPP outlet water, the passage to the protected area under the 6th Regional Directorate of the Republic of Türkiye Ministry of Agriculture and Forestry, Directorate General of Nature Conservation and National Parks is within the borders of our enterprise. For this reason, we are in contact with the relevant Directorate and we limit the crossings within the scope of the relevant directorate.
- In the past years, we have participated in the protection of the Mediterranean monk seal by making brochures for the Nature Conservation Branch Directorate. We are in constant contact with nature conservation officers to prevent poaching of wild mountain goats around the power plant.
- We donated a total of 28,600 tree saplings and 14,000 pines for tree planting and forestation projects. In 2021, we donated 400 olive saplings.

*In the past years, we have participated in the Mediterranean monk seal protection activities of the Nature Conservation Branch Directorate by making brochures.*



# GREEN PRODUCTS

Thanks to the Green Energy Certificate (I-REC), we have made the reliability of our energy resources globally auditable.



As GAMA Enerji, we have been entitled to receive this certificate by fulfilling international standards in our power plants with our goals aimed at protecting nature. As a company that produces Green Energy, we offer the opportunity to obtain a certificate so that every environmentally conscious eligible consumer, like us, can state that the electricity they use is supplied from renewable energy sources.

**R**enewable (green) energy is energy that can be obtained from natural and naturally renewable sources such as sunlight, wind, rain, tides, waves and geothermal heat.

Developed by RECs International, I-REC (Renewable Energy Certificate) is an international certification system that certifies that electricity is generated from renewable energy sources. Thanks to the Green Energy Certificate (I-REC), we have made the reliability of our energy supply globally auditable.

As GAMA Enerji, we have been entitled to receive this certificate by fulfilling international standards in our power plants with our goals aimed at protecting nature. As a company that produces Green Energy, we offer the opportunity to obtain a certificate so that every environmentally conscious eligible consumer, like us, can state that the electricity they use is supplied from renewable energy sources.

Our I-REC certificates and carbon credits that we sell and own as GATES Enerji Ticaret AŞ are listed below;



## SARES WPP/GS

- We got the Gold Standard
- We sold 242,516 tons of carbon credits between 2011-2015
- After 2015, the revalidation process for carbon credit sales has been initiated and we plan to complete the verification process in 2023 and make the credits ready for sale.



## ÇAKIRLAR HPP/GS

- We got the Gold Standard
- We sold 93,752 tons of carbon credits between 2013-2016
- We applied to GS for revalidation of post-2016 carbon credit sales



## LAMAS HPP/VCS

- Verified Carbon Standard-VCS
- We sold 241,645 tons of carbon credits between March 2009-2015
- Post-2015 carbon credit sales revalidation application to Verra



## KIRKAĞAC WPP /I-REC

- As of 2020, we have obtained The International REC Standard certificate
- We sold 86,818 2020 I-REC certificates based on 2020 production
- We sold 13,220 I-REC certificates for 2021 based on 2021 production
- We plan to continue in the same way in the coming period



## GÖKRES /I-REC

- As of 2020, we have obtained The International REC Standard certificate
- We sold 86,818 2020 I-REC certificates based on 2020 production
- We sold 13,220 I-REC certificates for 2021 based on 2021 production
- We plan to continue in the same way in the coming period



## KARADAĞ RES/I-REC

- As of 2020, we have obtained The International REC Standard certificate
- We sold 6,548 I-REC certificates for 2021 based on 2021 production
- We plan to continue in the same way in the coming period

In 2021, we sold 242,516 tons of carbon credits and 348,781 I-REC certificates for WPPs. Total carbon credit sales for HPPs amounted to 335,397 tons.



# DIGITAL TRANSFORMATION

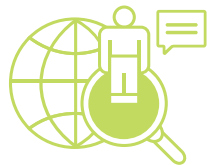
**We apply the ISO 27001 Information Security Management System standard to ensure the information security of our stakeholders and our own structure, to identify risks related to information assets and to systematically manage these risks.**



**T**he basis of development and change is now digitalization. As a result of digital transformation, there is a significant growth in information technology infrastructure and applications, and as a result, the area of information assets that you need to secure is expanding.

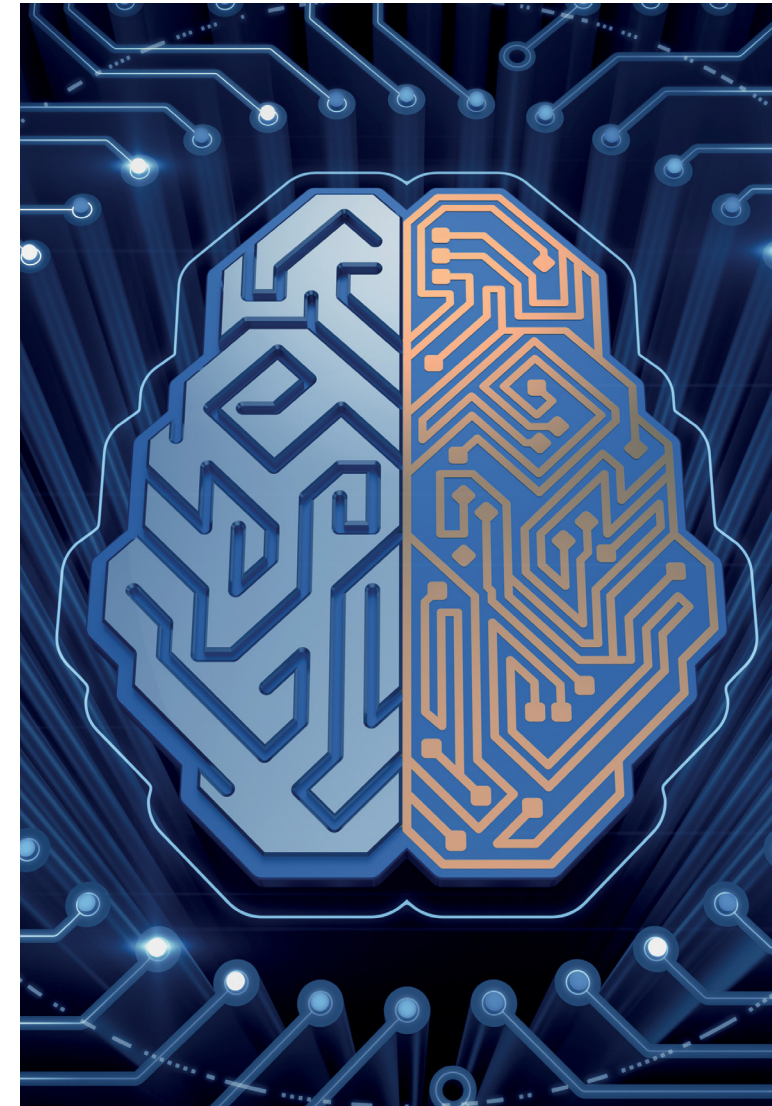
Threat analyses on information security show that approximately 53% of cyber-attacks target the energy sector, which is a strategic industry. In this context, we apply the ISO 27001 Information Security Management System standard to ensure the information security of our stakeholders and our own structure, to identify risks related to information assets and to systematically manage these risks.

We have certified the ISO 27001 Information Security Management System, which EMRA requires for power plants with an installed capacity of 100 MW or more, and we periodically have security analyses of both the Industrial Control Systems and the Corporate Information System performed by competent external companies.



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Industry 4.0, which we have heard a lot about recently, is the meeting of traditional production and industrial practices with digital technology. Digital technology includes concepts such as machine learning, big data and advanced analytics. In this context, our 853 MW İç Anadolu Natural Gas Power Plant in Kırıkkale is the first digital power plant in Türkiye with its operational and IT technology, and we continue to operate as a model for digital transformation. Our asset performance software, which runs on the cloud-based predix platform, is fed by the digital twin of the power plant, which is modeled one-to-one, and big data consisting of approximately 22,000 equipment in the field. We aim to reduce our production costs at the same time by conducting analysis studies to increase the efficiency of production processes from this big data. In addition, we carry out planned maintenance (downtime planning), failure prediction, predictive maintenance and work authorization processes for critical equipment at the power plant with the IBM Maximo asset management application.



*Running on the cloud-based predix platform, our asset performance software is fed by a digital twin of the power plant modeled exactly like the plant and big data from around 22,000 pieces of equipment on site.*





We prioritized digitalization, which is also important for the integrated operation of the software systems used in our company, as another pillar of our Do More with Less project. In this context, we aimed to move to the digitalization phase through the digital format, improve field operations, and develop commercial and project capability.



#### Do More with Less Project-Digitalization

In today's world, where companies, organizations and even small structures are moving towards digitalization, digital transformation significantly affects business efficiency and the correct use of values such as time and cash. For this reason, it has become inevitable to achieve digital transformation by leaving the analog way of doing business. We have prioritized digitalization, which is also important for the integrated operation of the software systems used in our company, as another pillar of our **Do More with Less** project. In this context, we aimed to move to the digitalization phase through the digital format, improve field operations, and develop commercial and project capability.

As GAMA Enerji, we aimed to determine the necessary actions to be taken in order to find the answers to the questions during our digital transformation journey and to see the result by increasing the efficiency of the current process accordingly. In this way, we carried out studies to monitor the interaction between the main software at the center of all business processes and other additional software. The actions we took for this study until the end of 2021 are as follows;

- We conducted literature searches for global applications
- By analyzing GAMA Enerji's digitalization status, we identified areas for improvement in the digitalization process and
- We conducted research for companies that can provide technical support in this regard

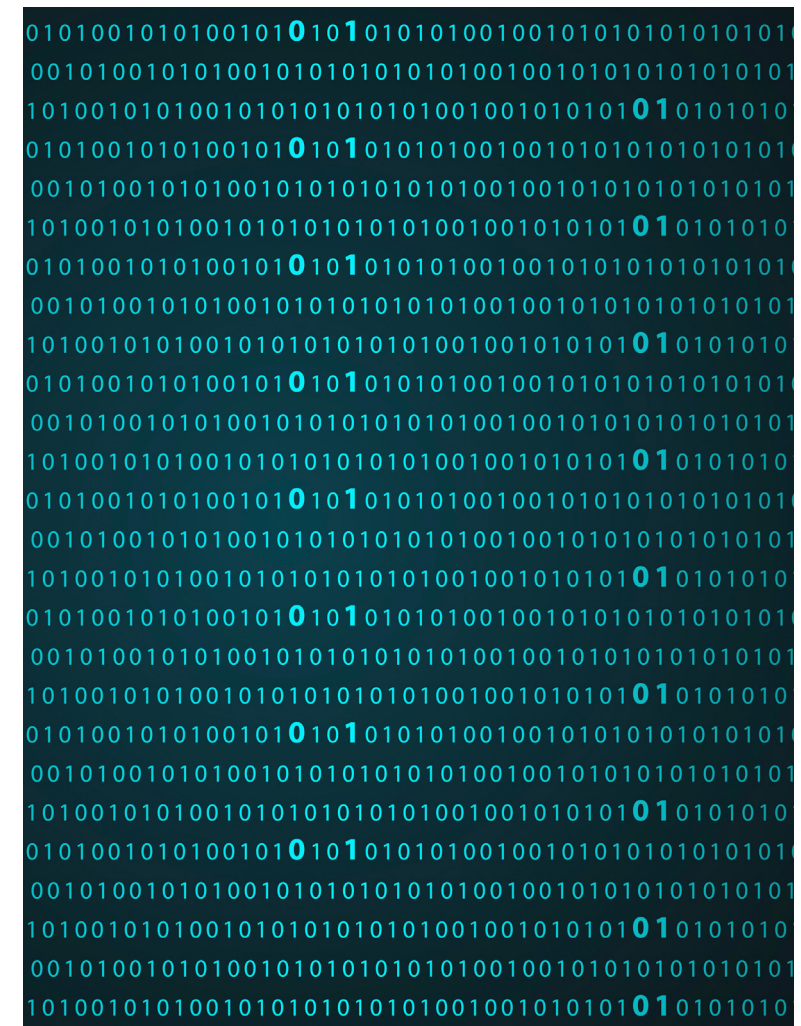
As a result of the actions taken, we have included digital solution-oriented studies with **"Envision"**, which we use as an Electronic Document Management system. In addition, thanks to our digitalization process, we have implemented the Hybrid and Flexible Working model, which we considered as a trial study in 2021, and we aim to continue our digital solution-oriented studies in 2022.

In addition, we aim to work with **Peoplise** as of 2022 in order to digitalize Human Resources processes and provide standardized service. Again, we aim to achieve the same standards in orientation processes and to sign an agreement with **Harmonise** in 2022, which increases efficiency to automate processes.

The actions we will take until the end of 2022 to achieve the targeted results of our digitalization journey are as follows;

- Conducting a comprehensive study on business processes and digital transformation with GAMA Holding IT and Human Resources departments

*As a result of the actions taken, we included digital solution-oriented works with "Envision", which we use as an Electronic Document Management system.*





# SUSTAINABILITY IN THE SUPPLY CHAIN

Among the factors we pay attention to when making purchases are the turnaround time of purchase requests into orders, the annual rate of change in prices and the planned delivery times of orders.



Factors we consider when making purchases include the turnaround time of purchase requests into orders, the annual rate of change in prices and the planned delivery times of orders. We adopt a sustainable approach, both environmentally, socially and in terms of business execution capacity.

By improving the content of our work, we are setting goals to take steps to share with our suppliers both our aspirations and our work indicating our direction in line with raising their awareness on sustainability.

We ask questions to our suppliers on environmental, social and corporate governance issues, which are among the important conditions in our supplier selection, and in line with the information we receive from them, we prefer to work with suppliers that we think will meet our company criteria.

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We share with you various figures and performance criteria regarding our supply chain.

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In the report, we shared various figures and performance criteria regarding our supply chain.

NUMBER OF SUPPLIERS	2021	2020
Total	1593	1314
Domestic	1500	1239
Approved Supplier	207	162

SUPPLY AMOUNTS	2021	2020
Total (TRY)	₺72,756,780.60	₺58,424,882.67
Total (USD)	\$16,082,865.90	\$2,441,102.45
Total (EUR)	€ 7,103,941.6	€ 1,947,944.8
Total (GBP)	£275.00	£13,934.76







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**OCCUPATIONAL  
HEALTH AND SAFETY**



# OCCUPATIONAL HEALTH AND SAFETY

Our Occupational Health and Safety Manager reports to the Quality and Certification Director.



We advance our processes with an Occupational Health and Safety Manager at our head office. We also have a full-time Occupational Physician at our head office.

**W**e strive to do our job with care. We always prioritize human health in the projects we realize and in the areas where we operate, and we provide support and services to our employees in this field.

As GAMA Enerji, we care about the health of all people and especially vulnerable groups living in all locations where we operate, we carry out all necessary monitoring and control activities within this framework and take all necessary precautions.

With our Occupational Health and Safety Unit working in our head office, our Occupational Health and Safety Experts working in our subsidiaries and facilities, we both maintain and control the legal processes completely, and we also advance our processes with the Joint Health and Safety Units that we receive consultancy services from as a third eye.

Our Occupational Health and Safety Unit reports to the Quality and Certification Director, who reports directly to the CEO of GAMA Enerji.

We keep all data and records related to Occupational Health and Safety in digital environment using our technological infrastructure in accordance with both legal regulations and ISO 45001:2018 Occupational Health and Safety Management System Standard. In addition to fulfilling the legal obligations regarding Occupational Health and Safety in GAMA Enerji and all our subsidiaries, we aim to make a difference with our "Zero Accident" target. While the world average of the "Lost Time Accident Frequency Rate", which is an indicator calculated according to each million working hours, is 2.67, the fact that this rate is 1.66 in our company is an important indicator of our targets, and we always update our targets to improve this rate. We pay utmost importance to the development of the experience that the detection of nonconformities called accidents and losses and the regulatory and preventive activities we carry out for this purpose will create in our memory in the corporate Occupational Health and Safety Culture base.

In the event of an occupational accident, we take actions in accordance with our procedures that we have established according to national and international rules, and we quickly take action for all necessary preventive actions to prevent the incident from recurring. We keep our records on a digital platform where all our employees can easily and quickly report, and we make our corporate memory on these issues transparently accessible to all our employees for the rapid dissemination of information to the general public.



We keep all data and records related to Occupational Health and Safety in digital environment in accordance with both legal regulations and ISO 45001:2018 Occupational Health and Safety Management System Standard.



Tablo: Accident/Case Data and Rates

OHS PERFORMANCE INDICATORS	Total Annual Operating Hours (GAMA Enerji)	WORK-RELATED INJURIES		SERIOUS INJURIES		WORK-RELATED DEATHS	
		Employee (integer)	Ratio of Total	Employee (integer)	Ratio of Total	Employee (integer)	Ratio of Total
GAMA Enerji- Domestic	413,406	6	14.5	1	2.4	0	0
GAMA Enerji- Abroad	23,040	0	0.0	0	0.0	0	0
Total	436,446	6	13.7	1	2.3	0	0

Tablo: Accident/Incident Data and Rates (Subcontractor Employees)

OHS PERFORMANCE INDICATORS	Total Working Hours (Subcontractor)	WORK-RELATED INJURIES		SERIOUS INJURIES		WORK-RELATED DEATHS	
		Employee (integer)	Ratio of Total	Employee (integer)	Ratio of Total	Employee (integer)	Ratio of Total
Subcontractor-Domestic	261,432	2	7.7	0	0.0	0	0
Subcontractor - Abroad	448,960	0	0.0	0	0.0	0	0
Total	710,392	2	2.8	0	0.0	0	0

We continue to work in accordance with national and international occupational health and safety legislation and standards in our regions and all affiliated subsidiaries. In 2020, we transferred the OHSAS 18001: 2007 Occupational Health and Safety Management System certification we obtained in 2012 to the ISO 45001: 2018 Occupational Health and Safety Management System Standard certification. The documents prepared by our central QHSE Department within the scope of these standards;



In 2020, we realized the transition of the OHSAS 18001: 2007 Occupational Health and Safety Management System certification, which we received in 2012, to the ISO 45001: 2018 Occupational Health and Safety Management System Standard certification.



We carry out all our Occupational Health and Safety activities under the leadership of GAMA Enerji Senior Management with the participation of all GAMA Enerji personnel in accordance with the commitments of the management. We meet the legal requirements in all our units and subsidiaries and provide services with ISO 45001:2018 certification.

*We carry out all our Occupational Health and Safety activities under the leadership of GAMA Enerji Senior Management with the participation of all GAMA Enerji personnel in accordance with the commitments of the management.*





# EDUCATION INFORMATION

We have made Occupational Health and Safety awareness a culture through training activities. We closely follow legal obligations on Occupational Health and Safety (OHS) issues.



Within the scope of OHS activities, a total of 15,886 hours of training was provided in 2021, and we provided OHS training to a total of 1,986 people, more than doubling the total training hours per person compared to the previous year.

We fulfill our obligations to ensure that the workforce we employ in our fields of activity across a wide geography work in healthy and safe environments. We adopt an occupational health and safety management approach that is committed to complying with local and international legislation and other relevant obligations.

We have made Occupational Health and Safety awareness a culture through training activities. We closely follow legal obligations on Occupational Health and Safety (OHS) issues. We aim to provide a safe working environment with the trainings we provide to our employees.



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Table: Annual Training Data

OCCUPATIONAL HEALTH AND SAFETY TRAINING	2021	2020	2019
Number of Employees Attending OHS Trainings	1,986	1,645	2,293
Total OHS Training Hours Provided	15,886	5,848	8,940
Training Hours per Person	8.0	3.6	3.9





**OUR EMPLOYEES**





It is essential for us to increase employee motivation and to keep employee loyalty and satisfaction at the highest level.

**B**uilding a good relationship with our employees is one of the most effective ways to increase productivity. Highly motivated employees produce better and more results. It is essential for us to increase employee motivation and to keep employee loyalty and satisfaction at the highest level. We prioritize implementing and constantly renewing management systems and practices that are in line with the developing and changing conditions of the day and that follow management trends. We respect the rights of employees to union organization and collective bargaining. We provide support in creating career plans and guiding employees.



We prioritize implementing and constantly renewing management systems and practices that are in line with the developing and changing conditions of the day and that follow management trends. We respect the rights of employees to union organization and collective bargaining. We provide support in creating career plans and guiding employees.

We see some of the factors that we think affect employees' job satisfaction and that we attach importance to as following:

- Job description,
- Salary and benefits,
- Perceived fairness of the promotion system,
- Quality of working conditions,
- Management style,
- Social relationships at work,
- Establishing a work-social life balance.



Working conditions are very important for our organization. Working conditions refer to the current conditions and working environment that affect the workforce at the workplace, including working hours, physical aspects, legal rights and responsibilities, organizational culture, workload and training. We aim to ensure that our employees feel peaceful and comfortable in their working environment with the rights and privileges we provide to them. We address and manage our regulations regarding working conditions within the scope of our Quality, Environment, Occupational Health and Safety Policy.

We create a healthy working environment by taking measures for the safety and health of our employees. We ensure full compliance with the legal regulations and compliance obligations in force in the country where we are located regarding Occupational Health and Safety and act accordingly in our activities. We also take occupational disease and work safety issues into consideration at every stage of our work.

*With the rights and privileges we provide to our employees, we aim to ensure that they feel peaceful and comfortable in their working environment.*



## RECRUITMENT, SELECTION, PLACEMENT AND ADAPTATION PROCESSES

At GAMA Enerji, we primarily evaluate internal resources in recruitment processes. In case the position cannot be filled with internal resources, we utilize employment platforms.



In 2021, we renewed our contract with Kariyer.net, one of the most preferred employment platforms in Türkiye, to continue our agreement in 2022. We started working with LinkedIn in 2021 and will continue to use it in 2022. We started working with Peoplise as of 2022. In addition, we plan to make an agreement with Harmonise in 2022, which increases efficiency by achieving the same standards in recruitment and placement processes and automating processes.

At GAMA Enerji, we primarily evaluate internal resources in recruitment processes. In case the position cannot be filled with internal resources, we utilize employment platforms. In 2021, we continued our agreement with **Kariyer.net**, one of the most preferred employment platforms in Türkiye, and renewed our contract to continue in 2022.

As of 2021, we started working with **LinkedIn**, another platform where the number of both employers and job seekers is rapidly increasing today. We will continue to use it in 2022 as it is a platform that we use effectively in the recruitment process of specialist and above positions, where we provide easy access to qualified talents and which we are happy to be a part of as an employer brand.

In order to automate, digitalize and accelerate Human Resources processes and to ensure that every candidate is served at the same standards, we held meetings with consultancy firms and started working with **Peoplise** as of 2022. Peoplise, which is an application where we can carry out processes such as filtering the candidate according to the pre-application conditions, arranging interviews, sharing interview invitations, and sending personality inventories, which we currently carry out with manpower, will also standardize the processes by being able to conduct interviews with standard questions.

We are planning to sign an agreement with **Harmonise** in 2022, which increases efficiency by achieving the same standards in recruitment and placement processes and automating processes.

We provide orientation training on the first day for new recruits at GAMA Enerji. The trainings are given first by the **Human Resources** department, followed by **Occupational Health and Safety, IT, Corporate Communications and Marketing** and **Envision**, the in-house document management system, by the relevant department managers. After the orientation training, we share **Orientation Presentation, Employee Album** and **Organization Chart** with the individuals.

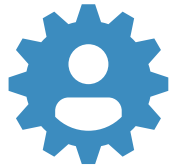


At GAMA Enerji, we have implemented the **Job Adaptation Process**, which aims to ensure that new employees understand the culture and structure of the company; learn the workflow, written and unwritten rules; ensure social cohesion; and achieve a balanced and healthy adaptation to their job, workplace and colleagues. We assign a **Guide**, decided by the Human Resources and Related Department Manager, to new recruits and ensure that the person is guided on the above-mentioned issues. At the end of the two-month process, we expect the person to evaluate GAMA Enerji in the same way as the person is evaluated by his/her guide. When the person completes his/her fifth month, he/she is evaluated by his/her manager and at the same time, we ensure that the process is beneficial for both parties by giving feedback about GAMA Enerji, the guide and the job.

GAMA Enerji is a company that students also want to experience, especially with a high rate of recruitment after internship. In 2021, we employed 2 interns full-time. In 2022, we will continue part-time with 1 intern who is still in school. We have agreements with TOBB University and Bahçeşehir University and we recruit interns according to the criteria we set.

*At GAMA Enerji, we have implemented the Job Orientation Process, which aims to ensure that new employees understand the culture and structure of the company; learn the workflow, written and unwritten rules; ensure social cohesion; and achieve a balanced and healthy adaptation to their job, workplace and colleagues.*





We act with the principle of equal pay for equal work in wage policies. We usually determine wage increases for all employees once a year in January and reflect them in the same month.

#### • Wage Management

Determining an objective and fair wage policy is one of our main principles. We act with the principle of **equal pay for equal work** in wage policies. We generally determine wage increases for all employees once a year in January and reflect them in the same month. We take into account industry standards in our wage increase determination periods, and if necessary, we determine the wage increase by taking the opinion of independent organizations.

#### • Management Systems, Complaints and Communication

We create sustainable management systems to realize and implement our policies. Such management systems include, at a minimum, identifying the person(s) responsible, enabling employees to make anonymous complaints about violations of policies, and ensuring that recruitment policies are clearly understood by employees and potential candidates.

We do not tolerate threats or retaliation of any kind against anyone who makes a complaint or whistleblower or who participates in activities to determine the veracity of a complaint/whistleblower. We guarantee that the identity of the complainant/ whistleblower will not be disclosed. Within the framework of this procedure, we apply the sanctions in the grievance disciplinary procedure against those who retaliate against or threaten those who have reported inappropriate behavior and ensure that the necessary actions are taken.

#### • Grievance Management Process

As GAMA Enerji, we have established our Grievance Mechanism Procedure to manage complaints from both internal and external sources. All internal and external complaints are recorded as defined in this procedure, handled by the established commission and resolved if necessary. In addition, for some special subsidiaries such as İÇAN and Karacaören HPP, we have established special procedures for the company and we carry out grievance management in the fields with the help of these procedures. We offer our employees the opportunity to report anonymously via the e-mail address [bildir@gamaenergy.com](mailto:bildir@gamaenergy.com)

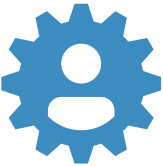
#### • Harassment and Violence

GAMA Enerji does not tolerate any form of harassment, including but not limited to physical, psychological harassment, sexual harassment, verbal harassment or abuse. GAMA Enerji complies with national laws, regulations and procedures regarding discipline, violence and harassment. When such a situation occurs, we take action in accordance with the Company Disciplinary Procedures, and we offer our employees the opportunity to report anonymously via the e-mail address [paylas@gamaenergy.com](mailto:paylas@gamaenergy.com)

*As GAMA Enerji, we have established our Grievance Mechanism Procedure to manage complaints from both internal and external sources.*







We adopt the principle of lifelong learning and consider developing ourselves and our employees as one of our main principles.

We encourage our employees to improve themselves and adopt an approach that always provides opportunities.

• Performance and Talent Management

At GAMA Enerji, we value talent development and always support our employees to develop themselves and highlight their talents. We work to ensure that our employees use their competencies and knowledge in the most active way. We support the competence and capacity development of our employees.

Selecting the right personnel for the right job is an important factor in creating added value to the business process. During the recruitment process, we recruit under equal and fair conditions by considering the compatibility of employee and position.

With our performance management program, we create a common understanding of GAMA Enerji's vision and goals, measure the effectiveness of the work carried out and ensure that our employees understand their contribution to the success of the organization. We support the continuous development of our employees through team and individual goal setting, materialization, measurement, feedback and development planning processes. We facilitate the functioning of the process with an effective technological infrastructure.

• Training and Development of Our Employees

We adopt the principle of lifelong learning and consider developing ourselves and our employees as one of our main principles. We encourage our employees to improve themselves and adopt an approach that always provides opportunities. We consider it as the fundamental responsibility of employees to develop themselves and their work, and to create value. We carry out supportive activities to develop our employees, taking into account their current and future organizational and individual needs.

In 2021, we provided an **Introduction to Electricity Markets Training** to all new employees for the first time within the scope of external trainings. The training enlightened employees about our stakeholders, our processes, the electricity market and current issues, where the sector was examined in detail.



In 2021, in addition to internal and external trainings, we also participated in seminars organized by GAMA Holding as GAMA Enerji employees. We had interviews with **Özgür Bolat** on Principles of Happiness and Success, our employee **Yaşar Özdemir** on his book Anahtar, and **Merve Gültekin** on Surfing with Stress.

As of 2022, we aim to organize **Department Introduction** meetings where information is shared about the scope of responsibilities of the departments, the distribution of tasks within the department and the stakeholders with whom we cooperate by enabling our departments in GAMA Enerji to share their business processes with other departments. In this way, we will have broader and more comprehensive information about the business processes of the departments and we will be able to develop more effective cooperation.

In addition, in 2022, we plan to revive the **GAMA Academy**, which is currently inactive, and to start a project that includes personal development, professional development, projects, seminars and various trainings for employees.

*We engage in supportive activities to develop our employees, taking into account their current and future organizational and individual needs.*

Table: Average Hours of Training Provided per Employee (Hours)

	Male			Female		
	2021	2020	2019	2021	2020	2019
Türkiye	25	20	28	25	20	28
Abroad	0	0	0	0	0	0
TOTAL	25	20	28	25	20	28



## Human Resource Management “For Us”



With the "For Us" project, which is another pillar of our "Do More with Less" project that we have implemented within GAMA Enerji, we aimed to establish a remote working infrastructure, provide a healthy and safe working environment, and implement talent management effectively in order to maintain the loyalty of our employees to our company and increase the motivation of our employees within the scope of human resources management work.

### Do More with Less Project-Human Resources Management

With the "For Us" project, which is another pillar of our "Do More with Less" project that we have implemented within GAMA Enerji, we aimed to establish a remote working infrastructure, provide a healthy and safe working environment, and effectively implement talent management in order to maintain the loyalty of our employees to our company and increase the motivation of our employees within the scope of human resources management work. With this project, we aim to provide long-term added value to our company and minimize the loss of talent by increasing employee motivation. In this way, we believe that we can increase our work quality and productivity and ensure the adoption of corporate sustainability within the company. The actions we have taken so far in this study; in which we evaluate our human resources management within the scope of "Do More with Less" are as follows;

- We evaluated Hybrid and Flexible working models and determined an implementation method for GAMA Enerji.
- We conducted literature research on the practices of sectoral/world-wide organizations.
- We conducted an employee and manager survey to understand our employees' approach to the project.
- We collected survey data and reviewed a detailed analysis of the new working model and then gathered information to present to our advisory team.
- We presented the Hybrid and Flexible working model to our management.
- We explained the scope of the Hybrid and Flexible working model to our employees and started to implement it on a 6-month trial basis.

The actions we will take until the end of 2022 to achieve the goal of this project, which is based on our Human Resources management and which we have initiated to provide our employees with a motivating, safe working environment where they can express themselves freely thanks to their talents;

- Identifying and organizing inter-departmental training topics and programs.
- Determining the scope and limits of the corporate support package.
- To develop more projects to increase the motivation and loyalty of our employees.

*With our "Do More with Less" project, we aim to provide long-term added value to our company and minimize the loss of talent by increasing employee motivation. In this way, we believe that by increasing our work quality and productivity, we can ensure the adoption of corporate sustainability within the company.*







#### • Strategic Human Resources Management Project

We aim to make GAMA Enerji one of the leading players in its sector in 2022 with its qualified and successful workforce and transform it into an organization that is trusted, highly competitive and has strong human resources systems. For this purpose, in 2021, we have embarked on a project with UNICON Consulting in order to strengthen our leadership in the sector and to reach our dreams for the future more effectively, firstly with the current business analysis study, then with business models, key processes, work and leadership culture and human resources management. In 2021, as a result of the surveys and workshops conducted with employees, a situation assessment was made, and as of February 2022; action plans were drawn up under 5 main headings "Organizational Design", "Defining Culture", "HR Management", "Processes and Organizational Structure", "Leadership Culture Development, Future Strategies and Organizational Clarity" and we aim to move to the project implementation phase, which will continue until October.



In 2021, in order to strengthen our leadership in the sector and to reach our dreams for the future more effectively, we have embarked on a project with UNICON Consulting company, firstly with the current business analysis study, then with business models, key processes, working and leadership culture and human resources management.

#### • Our Activities for Corporate Culture

We strive to beautify the environment we work in and to love what we do. We reflect the value we attach to our employees in our business culture and aim to ensure that this business culture is adopted and multiplied. We aim to increase work motivation through various activities within the organization.

**The Employee Album** is a file in which all GAMA Enerji employees are listed by department, their photographs, contact information and department descriptions are shared. With this document, especially new recruits have the opportunity to get to know both departments and individuals easily and quickly. By renewing our document every month, we ensure access to up-to-date information.

We are implementing the **Hybrid and Flexible Working** models, the implementation of which has increased with the Covid-19 process, within GAMA Enerji within the framework of a trial period until June 2022. We plan to start implementing the Hybrid and Flexible Working system in **February 2022**, which is on the agenda of "For Us", one of the voluntary project groups within the company. With this system, we have developed a hybrid working system where employees work from home 2 days a week and a flexible working system for days when hybrid working is not available. When our employees work flexibly, we expect them to be in the office between 09:00-17:00.

As GAMA Enerji, we aim to work with digitalization, which is one of the Human Resources processes, with **Easy HR** cloud-based personnel management software by 2022. We make plans to cover personnel management, performance management and personal affairs processes. We also send automatic congratulatory e-mails to people on their business anniversaries.

As GAMA Enerji Human Resources departments, we share **birthday greetings** with our employees on their birthdays, which are the most special days of our employees, with the title of "**Chief**", which is an old tradition.

We have revived the distribution of **bagels and cheese** on Thursdays, an old culture of GAMA Enerji.

With **Radyo Şef**, a radio program led by the Corporate Communications department, where a GAMA employee plays his/her own playlist every Friday between 17:00 and 18:00, we enable employees to play the music they want in the GAMA Building. Participation in this program is voluntary.

As GAMA Enerji, we provide financial support to our employees who get married and become parents.

*As GAMA Enerji, we aim to work with digitalization, which is one of the Human Resources processes, with Easy HR cloud-based personnel management software by 2022. We make plans to cover personnel management, performance management and personal affairs processes. We also send automatic congratulatory e-mails to people on their business anniversaries.*



Table: New Hire by Gender and Age

NEW RECRUITMENTS		2021 New Recruits	MALE						FEMALE					
			UNDER 30		30-50 YEARS OLD		ABOVE 50		UNDER 30		30-50 YEARS OLD		ABOVE 50	
			Number	Ratio	Number	Ratio	Number	Ratio	Number	Ratio	Number	Ratio	Number	Ratio
2021	Domestic	26	7	26%	2	7%	0	0%	15	56%	2	7%	0	0%
	Abroad	1	0	0%	1	4%	0	0%	0	0%	0	0%	0	0%
	Total	27	7	26%	3	11%	0	0%	15	55%	2	7%	0	0%

• Equal Opportunity and Diversity

As GAMA Enerji, we adopt the principle of equal treatment and demonstrate an equal and fair approach in all areas. We oppose discrimination and work with fair principles within the scope of our employees in our working areas and regions where we operate.

We behave fairly and provide equal opportunities in recruitment, training, performance evaluation, wages and benefits, and termination conditions. We do not show prejudice against personal differences and gender differences. We offer a working environment free from any kind of discrimination by respecting human rights and making our employees feel valued. We offer our employees the right to work in conditions that ensure freedom, dignity, economic security and equal opportunity regardless of race, belief, marital status, physical appearance, age or gender, and we protect these rights.

We are very sensitive about gender discrimination, which is the most common area of discrimination. We support women's active participation in all areas of life, especially in business life, and we work to implement practices that facilitate women's participation in business life. We attach importance to equal ratio of male and female employees. Although the ratio of male employees is higher due to the high number of blue-collar employees at the power plants, we are working on what improvements can be made in this regard. In this context, we support awareness-raising trainings to raise the awareness of our employees and subcontractors.



We support and encourage female employees to take part in managerial positions within the scope of their career goals. We care that all our employees balance work, family and social life.

Table: Average Hours of Training Provided per Employee by Gender (Hours)

AVERAGE TRAINING HOURS PER EMPLOYEE (HOURS)	2021		2020		2019	
	Female	Male	Female	Male	Female	Male
White Collar	40	35	32	41	30	37
Blue Collar	6	120	7	121	6	121
Total (Gender Based)	46	155	39	162	36	158
Total	201		201		194	

By adopting a gender-neutral and performance-based salary increase policy, we never allow gender discrimination in promotions. We support and encourage female employees to take part in managerial positions within the scope of their career goals. We care for all our employees to establish a balance between work, family and social life. We want our employees to be satisfied and to perform their work in a peaceful and healthy environment and we carry out activities for this purpose.





# CORPORATE SOCIAL RESPONSIBILITY AND GOOD PRACTICES



We organize events to reach out to our employees, customers and all those we affect in the social field, and we carry out activities in the social and environmental fields, especially sustainability.

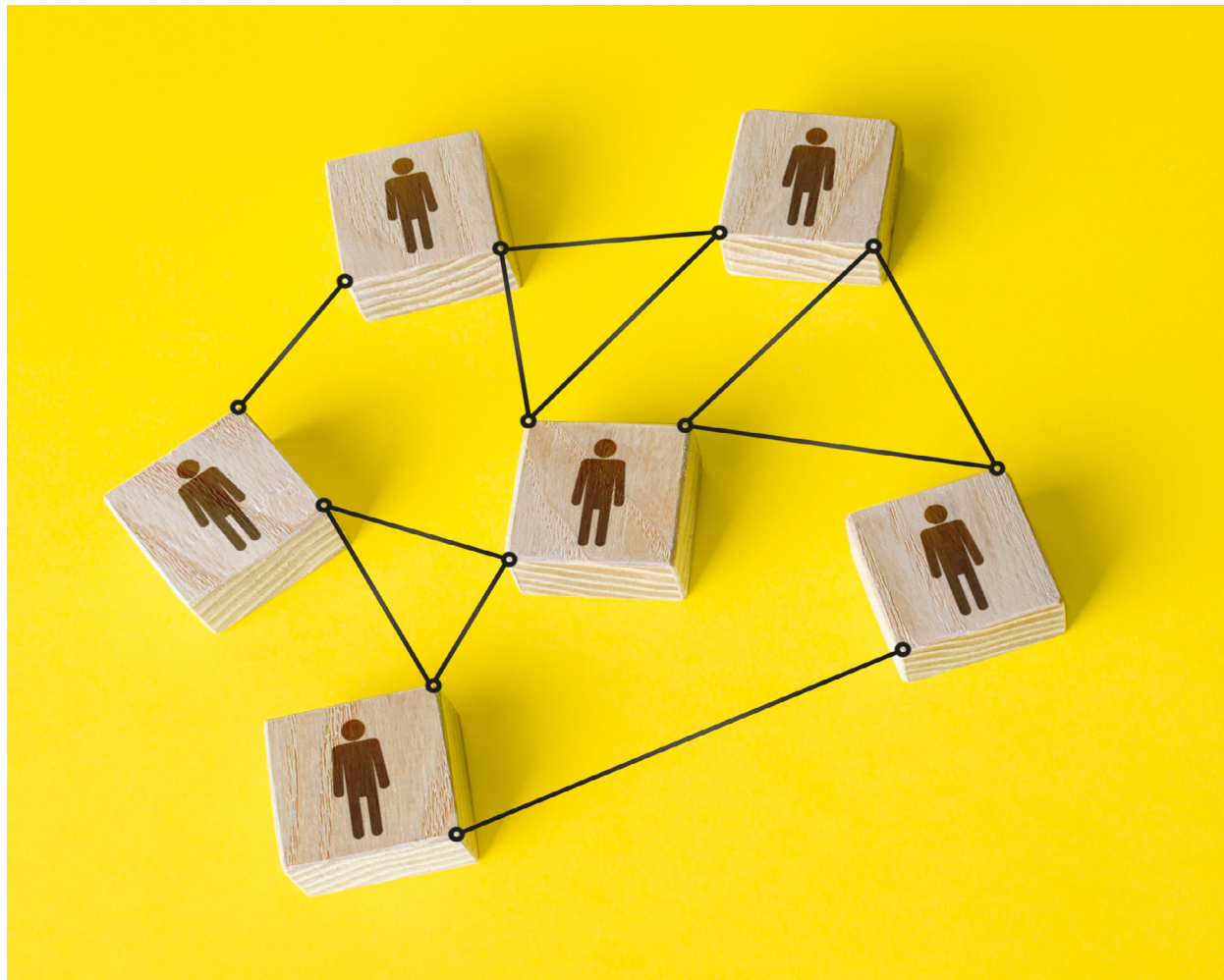


We support sustainable development as one of Türkiye's leading companies with our ethical values, reliability and way of doing business.

Within the scope of our outward-oriented perspective and our culture of working intertwined with society, we include social responsibility projects in our work. We organize events to reach out to our employees, customers and all those we affect in the social field, and we carry out activities in the social and environmental fields, especially sustainability.

We support sustainable development as one of Türkiye's leading companies with our ethical values, reliability and business conduct. We change the way we do business by evaluating economic, social development and environmental interactions with a holistic approach for a good and sustainable future.

In line with this perspective, at GAMA Enerji, our sustainability



strategy is based on;

- Embracing the future,
- Contributing to the development and welfare of countries with their activities,
- Prioritizing occupational safety, quality and cost-effectiveness, measuring and monitoring risks and opportunities, and developing permanent action plans,
- Attaching importance to the satisfaction of its stakeholders,
- Adopting a transparent and accountable corporate governance approach that is committed to ethical values,
- Sensitive and holistic view of economic, social development and environmental interactions,
- Supporting education and social aid projects,
- Adopting and implementing global standards and policies,
- Efficiency-oriented approaches.

With these core values, we work for both ourselves and our future and strive to produce projects that add meaning to society. We are working to energize our future and enlighten the future.

In 2020 and 2021, the challenging process we experienced deeply affected us all. For this reason, in order to protect the health of our employees and not to create more risks in the current situation, we created a calmer activity plan in 2021 with the pandemic effect and acted within this plan. We adopted an inward-oriented system in our work. By creating an internal activity calendar with the "0 Budget" logic, we aimed to prioritize activities that will raise awareness and increase employee satisfaction and motivation.

*The challenging period in 2020 and 2021 affected us all deeply. For this reason, in order to protect the health of our employees and not to create more risks in the current situation, we created a calmer activity plan with the pandemic effect in 2021 and acted within this plan.*





With our core values, we work for both ourselves and our future and strive to produce projects that add meaning to society. We are working to energize our future and enlighten the future.

*We are making arrangements for the re-implementation of our internship program, which we suspended due to the pandemic, and we are making our connections for our program studies in 2022. In our internship program, we adopt a system where students' development and education are monitored and their competencies are evaluated.*

- On October 11, the International Day of the Girl Child, we dedicated 39 of our wind turbines to the daughters of our employees and crowned them with their names in dedication to what makes this day special.
- Every Monday, we send exercise videos and reminders to our employees to get moving through our partner systems. We support a healthy lifestyle and work to create a good environment for our employees by providing them with healthy reminders.
- We show our support for training through information seminars and technical equipment support. In the training seminars we organize, we act by planning together with many departments (human resources and training departments, etc.).
- We organize special seminars and informative activities for our employees with psychologists and competent people in their fields.
- We are making arrangements for the re-implementation of our internship program, which we suspended due to the pandemic, and we are making our connections for our program studies in 2022. In our internship program, we adopt a system where students' development and education are monitored and their competencies are evaluated.
- We carry out a social and motivating activity with our Radio Chef event. Every Friday, one of our employees shares his/her music list with us on a voluntary basis and acts as a DJ.
- We use the Envision digital solution system to adopt and communicate the zero waste culture within our organization. With Envision, our electronic document management system, we send reminders, visual content sharing and information notes on the subject.

## CORPORATE SOCIAL RESPONSIBILITY PROJECTS

Within the scope of corporate social responsibility projects, we realized the activities listed below:

*The event was organized at Ankara University with the support of the GAMA Education Foundation established within the Holding, to which we, as GAMA Enerji, have contributed greatly.*

- We organized a seminar with Social Entrepreneur and Creator of Giyi Brand.
- As GAMA Enerji, we provided assistance to the regions affected by the fires in 2021. We showed our support to the people of the region by cooperating with the municipalities in the region and providing support with aid packages.
- We supported the Teknofest (SAHIN96) team.
- We participated in the BUSINESS CUP Backgammon Tournament.
- GAMA Education Foundation Scholarship Program with the support of the GAMA Education Foundation established within the Holding, to which we, as GAMA Enerji, have contributed greatly, we have provided cash scholarships to successful students at Ankara University and scholarships for TÖMER English courses to support their English education. We have also carried out activities outside the university such as the establishment of school laboratories (purchasing HEK (Scrap-Debris-Destroyed) devices from hospitals, procurement of donated devices, etc.), internship programs, technical trips, enabling students to meet managers from the sector, participating in interviews and trainings that will improve themselves before entering business life.
- We participated in the TUBITAK 4006 Science Fair organized at schools in our central region and provided information to secondary school students.
- We organized an Energy Efficiency Event.





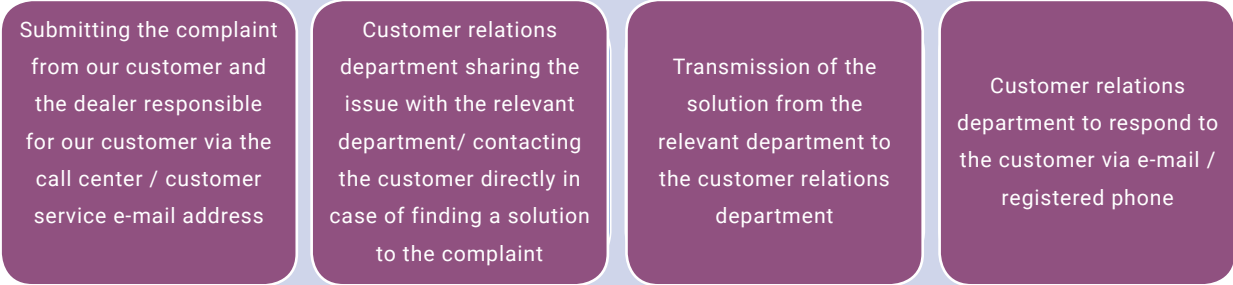
We launched a multifaceted and comprehensive project called "Do More with Less" to create value during the pandemic period. With this project, we aimed to contribute to the company's value creation process with the participation of our employees under four main headings.

- **OHS Seminar**  
As GAMA Enerji, our Quality and Certification Director met with the students of Hacı Bayram Veli Faculty of Fine Arts, Department of Visual Communication and Design on May 18, 2021 and gave a seminar within the scope of Basic Occupational Health and Safety. In the seminar, we gave detailed information on "What kind of legislative requirements await young people in business life in terms of occupational health and safety, and the obligations of young entrepreneurs who want to start a business in terms of occupational health and safety if they become employers".

- Organizations that our institution supports/is a member of**
- International Investors Association (YASED)
  - Electricity Producers Association (EÜD)
  - Energy Trade Association (ETD)
  - World Energy Council (WEC)
  - Search and Rescue Association (AKUT)
  - METU Design Factory
  - Education and Culture Foundation of the Chambers and Commodity Exchanges of Türkiye University of Economics & Technology (TOBB ETU)
  - GAMA Education Foundation

We launched a multifaceted and comprehensive project called "Do More with Less" to create value during the pandemic period. With this project, we aimed to contribute to the company's value creation process with the participation of our employees under four main headings: Emerging Markets, Triple Balance Sheet, Human Resources Management and Digital Transformation. We formed groups under these four main headings. The most important feature of these groups is that there are employees who want to participate in this project voluntarily. The project is still ongoing and each group continues to work by focusing on a specific project.

# CUSTOMER COMPLAINT MANAGEMENT



**W**e ensure that the problem is resolved and transferred to our customers within an average of 3.5 business days after the relevant complaints are received by us. By evaluating the actions we take regarding the process, we carry out improvement studies and strive to provide better quality service. By evaluating the feedback we receive from our customers, we contact our customers who encounter or may encounter the same problem before the situation occurs.

Many of our customers switched to working from home due to the impact of the pandemic, resulting in a decrease in their electricity consumption. On the other hand, our customers benefiting from the industrial tariff continued to work in the same way. In this process, the issue that our call center was most interested in was the misinterpretation of the statements made in the electricity market by consumers. Due to this situation, many requests, complaints and demands were received by our call center and sales authorities, and we minimized customer loss as a result of our customer services, call center, trade support team and sales team managing the process very well and working effectively. We observed an increase in our customer satisfaction as a result of good and effective management of the process.

*By evaluating the feedback we receive from our customers, we contact our customers who encounter or may encounter the same problem before the situation occurs.*

**Table:** Customer Complaint and Resolved Grievance Data

TOTAL	2021	2020	2019
Total Customer Grievances	660	1,142	530
Resolved Customer Grievances	149	138	226



## March 8<sup>th</sup> International Women's Day Guest GÖKNİL BİGAN

Our event, where Göknil Bigan, social entrepreneur and owner of the "Giyi" brand, Co-Founder and Board Member of the "Yeniden Biz" platform, took part as a speaker, was broadcast live via Skype on March 18, 2021. Göknil Bigan, who answered the questions of GAMA employees in the pleasant conversation attended by Ömer Tunçata, Chairperson of the Board of Directors of GAMA Holding, inspired us with her valuable shares for the spread of women entrepreneurship.

**Women's Power and Social Entrepreneurship /  
March 8, 2021**



## We Will Re-Green

As GAMA, we donated saplings to the campaign initiated by the Türkiye Contractors Association in order to re-green our tomorrows for the future of Türkiye and the world.

**We Will Re-Green - July 2021**



## Support to Fire Zones

Following the fire disasters in various regions of Türkiye in July 2021, GAMA sent aid packages containing power banks, fireproof gloves, fireproof shoes, flashlights, head lamps, N95 dust masks and thin pen batteries to the areas in need, in line with the request of Muğla Municipality.

**Parcels are on their way to the Fire Zone July 2021**



## SAHIN96 Ranked First at Teknofest

Osmaniye Şehit Major Adil Karagöz Anatolian High School students Cihanay KELKOCA, Oğulcan DOĞAN, Sidar YALÇIN and Emirhan DEMİR, who participated in the "Technology for the Benefit of Humanity" competition organized by Teknofest in the "Disaster Management" category, won 1st place in Türkiye at high school level with their project "SAHIN96 Unmanned Aerial Vehicle Fire Extinguishing Ammunition", which they developed thanks to their innovative perspective. Within the scope of the competition, the students developed fire extinguishing ammunition designed with Unmanned Aerial Vehicles (UAV) in order to intervene early in fires. As GAMA, we are happy to contribute to this project developed to protect our future and nature.

**Teknofest SAHIN96- 2021**



## We Participated in the Business Cup Backgammon Tournament

As GAMA, we took part in the Business Cup Backgammon Tournament organized between companies in July 2021. Our employees who ranked in the tournament organized on the Sugar Feast represented GAMA in the organization.

**BUSINESS CUP Backgammon Tournament-July 2021**



## "Surfing with Stress" with Merve Gültekin

An online seminar was organized for GAMA employees on September 15, 2021 to recognize and manage our stress and anxiety levels. In our seminar titled "Surfing with Stress" with Expert Clinical Psychologist Merve Gültekin, we discussed the effects of stress on us, the personal face of stress and how we should prepare our children for life as parents.

**Surfing with Stress - September 15, 2021**



## GAMA Education Foundation Scholarship Program

For the 2021-2022 academic year, the GAMA Education Foundation is providing scholarships to 12 successful students selected from among the students of Ankara University GAMA Vocational School. In addition to financial aid, the GAMA Education Foundation provides students with opportunities such as seminars, internship programs at power plants and computer equipment.

GAMA Education Foundation aims to ensure that the investments made in Türkiye since 1997 are sustainable and that the projects supported provide lasting benefits.

**GAMA Education Foundation Scholarship Program**



## GAMA Enerji Informed Students at TUBITAK 4006 Science Fair

GAMA Enerji shared its knowledge on the project titled "How is Electricity Generated?" at the Tübitak 4006 Science Fair held on October 14-15 in the village of Karacaören, where our power plant is located. A mini HPP prototype was made by our power plant employees and students were informed about how electricity is generated and transmitted.

**GAMA Enerji Informed Students at TUBITAK 4006 Science Fair - October 14-15, 2021**



## Energy Efficiency Event

57 GAMA Enerji personnel from GAMA Enerji head office, GATES Istanbul office and all our power plants participated in the "ISO 50001:2018 Energy Management System and Energy Efficiency" training organized by GAMA Enerji OHS department on Thursday, October 21, 2021. Within the scope of the training, the participants were given a general information about the ISO 50001 Energy Management System and the actions already taken by GAMA Enerji regarding energy management. In the second part of the training, visuals of the campaign with energy saving tips were presented to the participants. It was aimed to raise the awareness of all employees by explaining how to use electricity, water and heat energy efficiently in both working and living areas. These visuals were shared as pop-up notifications in the EnVision system throughout November and made visible on all computers as screen savers. It was planned to repeat Energy Efficiency Trainings at GAMA Enerji at least twice a year and to ensure the participation of all employees.

**Energy Efficiency Event-October 21, 2021**



## "Principles of Happiness and Success" with Dr. Özgür Bolat

We held an interview on "Principles of Happiness and Success" with Dr. Özgür Bolat, who created his own success and happiness model based on the question "How to raise a happy and successful person", in our conference hall on October 26, 2021. During the pleasant conversation, Dr. Bolat talked about his own happiness formula and made statements that will increase our awareness about the parent-child relationship, accompanied by answers to various questions posed to our employees.

**"Principles of Happiness and Success" with Dr. Özgür Bolat -26 October 2021**



# GAMA ENERJİ





**ANNEXES**



# ECONOMIC VALUE WE CREATE

## I. DIRECT ECONOMIC VALUE CREATED (TRY)

	2021	2020	2019
Net Sales	4,485,637,374	2,893,277,655	2,250,227,570
Dividends from investments revalued with equity			
Income from investing activities			
Financial income	40,765,497	32,678,700	35,913,032
<b>Revenues</b>	<b>4,526,402,871</b>	<b>2,925,956,355</b>	<b>2,286,140,602</b>

## II. ECONOMIC VALUE DISTRIBUTED(TRY)

Cost of sales	-3,337,159,613	-2,121,003,570	-2,168,606,195
(including operating expenses)			
Remuneration and benefits provided to employees	-66,726,600	-47,833,301	-41,199,984
Financial expenses	-3,289,058,436	-1,657,651,539	-1,126,466,603
Tax expenses			
(Payments to the government)	-14,592,495	-26,421,349	-5,239,902
<b>Expenses</b>	<b>-6,692,944,649</b>	<b>-3,826,488,410</b>	<b>-3,336,272,782</b>

## III. ECONOMIC VALUE PROVIDED(TRY)

Revenues	4,526,402,871	2,925,956,355	2,286,140,602
Expenses	-6,692,944,649	-3,826,488,410	-3,336,272,782
<b>Economic Value Provided</b>	<b>-2,166,541,778</b>	<b>-900,532,055</b>	<b>-1,050,132,180</b>

# PERFORMANCE INDICATORS

**Table:** Annual Performance Remuneration Rate

Annual total remuneration for the organization's highest paid individual	2,841,505.54
Median annual total remuneration for all employees of the organization, excluding the highest paid person	48,440,858.87
Change in annual total remuneration rate	5.86%

**Table:** Annual Performance Remuneration Change

Percentage increase in annual total remuneration for the highest paid person in the organization	130%
Median annual percentage increase in total remuneration for all employees of the organization, excluding the highest paid person	46%
Change in annual total remuneration rate	2.845

# ENVIRONMENTAL PERFORMANCE

PLANT	Energy Type	Energy Consumption (GJ)		
		2021	2020	2019
ÇAKIRLAR	Electricity Supply	533.13	642.16	618.90
ÇAKIRLAR	Diesel - Stationary Combustion	39.65	35.69	35.69
ÇAKIRLAR	Diesel - Mobile Combustion	870.73	615.05	611.12
Disi	Gasoline - Mobile Combustion	18,164.36	18,308.75	21,482.04
Disi	Diesel - Mobile Combustion	3,683.21	3,997.28	4,425.56
Disi	Diesel - Stationary Combustion	5,557.15	5,246.43	5,282.12
Disi	Electricity Supply	1,078,297.07	1,031,922.00	1,042,506.00
İÇAN	Electricity Supply	10,831.68	24,290.28	40,221.36
İÇAN	Diesel - Stationary Combustion	166.84	167.89	301.65
İÇAN	Gasoline - Mobile Combustion	4,130.53	0.00	0.00
İÇAN	Diesel - Mobile Combustion	506.80	460.04	952.57
İÇAN	Natural gas	28,997,609.92	25,385,499.57	18,212,734.66
KARACAÖREN I	Gasoline - Mobile Combustion	10.16	10.16	0.98
KARACAÖREN I	Electricity Supply	1,224.40	1,767.64	1,758.46
KARACAÖREN I	Diesel - Stationary Combustion	27.90	7.67	17.67
KARACAÖREN I	Diesel - Mobile Combustion	71.38	61.74	91.01
KARACAÖREN II	Gasoline - Mobile Combustion	4.92	6.56	4.59
KARACAÖREN II	Electricity Supply	757.60	862.92	923.76
KARACAÖREN II	Diesel - Stationary Combustion	10.77	7.92	10.14
KARACAÖREN II	Diesel - Mobile Combustion	46.43	41.33	49.75
LAMAS HPP	LPG	2.84	1.70	4.54
LAMAS HPP	Electricity Supply	1,863.90	1,965.43	1,957.66
LAMAS HPP	Diesel-Stationary Combustion	42.65	39.62	41.79
LAMAS HPP	Diesel-Stationary Combustion	190.83	234.88	245.94
SARES-GÖKRES- KARADAĞ-KIRKAĞAÇ	LPG	0.00	1.14	1.14
SARES-GÖKRES- KARADAĞ-KIRKAĞAÇ	Diesel-Stationary Combustion	10.29	13.56	12.10
SARES-GÖKRES- KARADAĞ-KIRKAĞAÇ	Electricity Supply	2,349.62	2,618.21	3,042.83
SARES-GÖKRES- KARADAĞ-KIRKAĞAÇ	Diesel- Mobile Combustion	964.60	834.43	1,148.50



## SOCIAL PERFORMANCE

	2021		2020		2019	
NUMBER OF EMPLOYEES BY WORKING HOURS	Female	Male	Female	Male	Female	Male
0-5 Years	31	57	31	57	12	55
5-10 Years	12	59	12	59	20	54
10 Years and Over	3	39	3	39	4	49
Total (By Gender)	46	155	46	155	36	158
Total	201		201		194	

	2021		2020		2019	
NUMBER OF EMPLOYEES BY GENDER AND AGE	Female	Male	Female	Male	Female	Male
Over 50 Years	0	10	0	10	0	9
Between 30-50 Years	21	87	21	87	18	89
Under 30 Years	25	58	25	58	18	60
Total (by Gender)	46	155	46	155	36	158
Total	201		201		194	

	2021		2020		2019	
EXECUTIVES	Female	Male	Female	Male	Female	Male
Over 50 Years	0	3	0	3	0	3
Between 30-50 Years	4	8	2	6	2	6
Under 30 Years	6	12	4	9	4	9
Total (by Gender)	10	23	6	18	6	18
Total	33		24		24	

	2021		2020		2019	
MEMBERS OF THE BOARD OF DIRECTORS	Female	Male	Female	Male	Female	Male
Over 50 Years	0	2	0	2	0	2
Between 30-50 Years	1	1	0	1	0	1
Under 30 Years	0	0	0	0	0	0
Total (by Gender)	1	3	0	3	0	3
Total	4		3		3	

	2021		2020		2019	
NEW HIRES BY GENDER AND AGE	Female	Male	Female	Male	Female	Male
Over 50 Years		2		2		2
Between 30-50 Years	6	3	5	5	2	4
Under 30 Years	7	6	4	1	5	5
Total (by Gender)	13	11	9	8	7	11
Total	24		17		18	

	2021		2020		2019	
NEW HIRES BY GENDER AND AGE	Female	Male	Female	Male	Female	Male
Over 50 Years		3		1		3
Between 30-50 Years	7	12	3	2	2	15
Under 30 Years	3	5	2	2	7	11
Total (by Gender)	10	20	5	5	9	29
Total	30		10		38	

	2021	2020	2019
NUMBER OF DISABLED EMPLOYEES BY			
Woman	0	0	0
Man	1	1	0
Total	1	1	0

	2021		2020		2019	
MATERNITY LEAVE	Female	Male	Female	Male	Female	Male
Number of Employees on Maternity Leave	3		4		2	
Number of Employees Returning to Work after Maternity Leave	2		3		2	
Number of Employees Who Returned to Work After Maternity Leave and Worked for At Least 12 Months	2		3		2	

	2021	2020	2019
NUMBER OF SUBCONTRACTED EMPLOYEES BY GENDER			
Woman	1	1	1
Man	362	361	421
Total	363	362	422

Filled according to the number of subcontractors at the end of December. The number of male and female DİWACO subcontractors is not available. Since most of them are men, all of them are written as men.



# GRI CONTENT INDEX



We have developed the content of the report in accordance with the requirements of the GRI Standards Basic option. We have received confirmation that the general notifications between GRI Standards 102-40 and 102-49 under the "Materiality Disclosures Service " offered by GRI are correctly included in the report. The service was provided through the Turkish version of the report.

GRI STANDARDS	NOTIFICATIONS	HEADINGS or ANSWERS	PAGE/URL
GRI 101: Foundation 2016			
General Disclosures			
GRI 102: General Disclosures 2016	Organizational Profile		
	102-1	About the Report	6
	102-2	About GAMA Enerji Our Assets	11,12 16-27
	102-3	GAMA Enerji Headquarters	<a href="https://enerji.gama.com.tr/tr/iletisim/">https://enerji.gama.com.tr/tr/iletisim/</a>
	102-4	About GAMA Enerji Our Assets	11,12 16-27
	102-5	About GAMA Enerji	11
	102-6	About GAMA Enerji Subsidiaries Our Assets	11,12 13-15 16-27
	102-7	About GAMA Enerji Subsidiaries Our Assets Economic Value We Create	11,12 13-15 16-27 144
	102-8	Our Employees Social Performance	114,115 147
	102-9	Sustainability in the Supply Chain	102,103
	102-10	In the reporting period, although changes were made in the organizational structure of the company to increase the management efficiency, there was no change that would create a large-scale difference that would affect the operating structure of the company.	148

GRI STANDARDS	NOTIFICATIONS	HEADINGS or ANSWERS	PAGE/URL
GRI 102: General Disclosures 2016	Organizational Profile		
	102-11	Our Sustainability Approach Risk Management Our Sustainability Policy	36,37 38,39 58-61
	102-12	Our Sustainability Approach	36,37
	102-13	Organizations that our institution supports/ is a member of	134
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	102-14	Message from CEO	4,5
	102-15	Risk Management Our Sustainability Policy Our Sustainability Approach	38-44 58-61 62-65
	Ethics and Integrity		
	102-16	Values We Consider in Our Management	50-55
	102-17	Ethics Management	46,47
	Governance		
	102-18	Board of Directors Gama Enerji Committees	30,31 32,33
	102-19	Board of Directors Gama Enerji Committees	30,31 32,33
	102-20	Board of Directors Gama Enerji Committees	30,31 32,33
	102-21	Gama Enerji Committees Relations With Our Stakeholders	32,33 62
	102-22	Board of Directors Gama Enerji Committees	30,31 32,33
	102-23	Board of Directors	30,31
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	102-26	Gama Enerji Committees	32,33



GRI STANDARDS	NOTIFICATIONS	HEADINGS or ANSWERS	PAGE/URL
GRI 102: General Disclosures 2016	Governance		
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	102-29	Risk Management Our Sustainability Policy Our Sustainability Approach	38-44 58-61 62-65
	102-30	Risk Management	38-44
	102-31	Risk Management	38-44
	102-32	Our Sustainability Approach	62-65
	102-33	Our Sustainability Policy Our Sustainability Approach	58-61 62-65
	102-35	Human Resources Management Policy	<a href="https://enerji.gama.com.tr/tr/kariyer/ga-mali-olmak/insan-kaynak-lari-politikala-rimiz/">https://enerji.gama.com.tr/tr/kariyer/ga-mali-olmak/insan-kaynak-lari-politikala-rimiz/</a>
	102-36	Human Resources Management Policy	<a href="https://enerji.gama.com.tr/tr/kariyer/ga-mali-olmak/insan-kaynak-lari-politikala-rimiz/">https://enerji.gama.com.tr/tr/kariyer/ga-mali-olmak/insan-kaynak-lari-politikala-rimiz/</a>
	Stakeholder Engagement		
	102-40	Relations With Our Stakeholders	62
	102-41	Social Performance	147
	102-42	Relations With Our Stakeholders Stakeholder Dialogue and Material Issues	62 63-65
	102-43	Relations With Our Stakeholders Stakeholder Dialogue and Material Issues	62 63-65
	102-44	Our Sustainability Policy Relations With Our Stakeholders Stakeholder Dialogue and Material Issues	58-61 62 63-65

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GRI 102: General Disclosures 2016	Reporting Practice		
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	102-46	Our Sustainability Policy Stakeholder Dialogue and Material Issues	58-61 64,65
	102-47	Stakeholder Dialogue and Material Issues	64,65
	102-48	Gama Sustainability Report 2021	6
	102-49	Stakeholder Dialogue and Material Issues	64,65
	102-50	About the Report	6
	102-51	It is the organization's first sustainability report.	6
	102-52	Annually	6
	102-53	Contact	Back Cover
	102-54	About the Report	6
	102-55	GRI Content Index	148-158
	102-56	The data shared in the report has not been independently verified for the purposes of this report.	Back Cover



GRI STANDARDS	NOTIFICATIONS	HEADINGS or ANSWERS	PAGE/URL
GRI 200: ECONOMIC STANDARD SERIES			
GRI 103: Management Approach 2016	Economic Performance		
	103-1	Economic Value We Create	144
	103-2	Economic Value We Create	144
	103-3	Our Contribution to Sustainable Development Goals	66
	201-1	Economic Value We Create	144
GRI 201: Economic Performance 2016	Market Presence		
GRI 103: Management Approach 2016	103-1	Performance Indicators	144
	103-2	Our Contribution to Sustainable Development Goals	66
	103-3	Our Contribution to Sustainable Development Goals	66
GRI 202: Market Presence 2016	202-1	Performance Indicators	144
GRI 103: Management Approach 2016	Indirect Economic Impacts		
	103-1	Economic Value We Create	144
	103-2	Economic Value We Create	144
	103-3	Economic Value We Create	144
	203-1	Corporate Social Responsibility Projects	133,134
GRI 203: Indirect Economic Impacts 2016	203-2	Corporate Social Responsibility Projects	133,134

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GRI 103: Management Approach 2016	Anti-corruption		
	103-1	Our Sustainability Policy Stakeholder Dialogue and Material Issues	61 64,65
	103-2	Ethics Management Our Sustainability Policy	46,47 61
	103-3	Ethics Management Our Sustainability Policy	46,47 61
	205-1	Ethics Management Our Sustainability Policy	46,47 61
GRI 205: Anti-corruption 2016	205-2	Ethics Management Our Sustainability Policy	46,47 61
	205-3	Ethics Management Our Sustainability Policy	46,47 61
GRI 300: ENVIRONMENTAL STANDARD SERIES			
GRI 103: Management Approach 2016	Energy		
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	103-2	Stakeholder Dialogue and Material Issues Energy Management	64,65 84-86
	103-3	Stakeholder Dialogue and Material Issues Our Contribution to Sustainable Development Goals	64,65 66
	302-1	Energy Management Environmental Performance	83 145
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GRI 103: Management Approach 2016	Water and Effluents		
	103-1	Stakeholder Dialogue and Material Issues Water and Wastewater Management	64,65 87,88
	103-2	Stakeholder Dialogue and Material Issues Water and Wastewater Management	64,65 87,88
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GRI 103: Management Approach 2016	103-1	Stakeholder Dialogue and Material Issues Biodiversity	64,65 93
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GRI 304: Biodiversity 2016	304-1	Biodiversity	93,94
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	304-4	Biodiversity	95

GRI STANDARDS	NOTIFICATIONS	HEADINGS or ANSWERS	PAGE/URL
GRI 103: Management Approach 2016	Emissions		
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	103-2	Stakeholder Dialogue and Material Issues Climate Change Risks and Opportunities Greenhouse Gas Emissions	64,65 44 78
	103-3	Stakeholder Dialogue and Material Issues Climate Change Risks and Opportunities Greenhouse Gas Emissions	64,65 44 78
GRI 305: Emissions 2016	305-1	Greenhouse Gas Emissions	79
	305-2	Greenhouse Gas Emissions	79
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GRI 103: Management Approach 2016	103-1	Stakeholder Dialogue and Material Issues Waste Management	64,65 90,91
	103-2	Our Contribution to Sustainable Development Goals Our Sustainability Activities Waste Management Zero Waste	69 71-73 90,91 92
	103-3	Our Contribution to Sustainable Development Goals Our Sustainability Activities Waste Management Zero Waste	69 71-73 90,91 92
GRI 306: Waste 2020	306-1	Waste Management	90,91
	305-2	Waste Management	90,91
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GRI 103: Management Approach 2016  GRI 308: Supplier Environmental Assessment 2016	Supplier Environmental Assessment		
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	103-2	Stakeholder Dialogue and Material Issues Sustainability in the Supply Chain	64,65 102,103
	103-3	Stakeholder Dialogue and Material Issues Sustainability in the Supply Chain	64,65 102,103
GRI 400: SOCIAL STANDARD SERIES	308-1	Sustainability in the Supply Chain	102,103
	Employment		
	103-1	Stakeholder Dialogue and Material Issues Our Recruitment, Selection, Placement and Adaptation Processes	64,65 116,117
	103-2	Our Recruitment, Selection, Placement and Adaptation Processes	116,117
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	103-2	Occupational Health and Safety	106,107
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	404-1	Our Employees	121
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	404-3	Our Employees	127



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GRI 103: Management Approach 2016  GRI 405: Diversity and Equal Opportunity 2016	Diversity and Equal Opportunity		
	103-1	Stakeholder Dialogue and Material Issues Equal Opportunity and Diversity	64,65 126,127
	103-2	Equal Opportunity and Diversity	126,127
	103-3	Equal Opportunity and Diversity	126,127
	405-1	Equal Opportunity and Diversity	126,127
GRI 103: Management Approach 2016  GRI 408: Child Labour 2016	405-2	There is no discrimination based on gender in remuneration. Remuneration is based on performance.	158
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	103-1	Ethics Management	47
	103-2	Ethics Management	47
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GRI 103: Management Approach 2016  GRI 414: Supplier Social Assessment 2016	408-1	Child Labour and Prevention of Child Labour	55
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	103-2	Stakeholder Dialogue and Material Issues Sustainability in the Supply Chain	64,65 102,103
	103-3	Stakeholder Dialogue and Material Issues Sustainability in the Supply Chain	64,65 102,103
GRI 414: Supplier Social Assessment 2016	414-1	Sustainability in the Supply Chain	102,103

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The Sustainability Report (Report) has been prepared in accordance with the “Core” option of the GRI Standards. In addition, the guidance of the United Nations Sustainable Development Goals (SDGs) was also used. All information and opinions contained in the report, which do not qualify as complete, were conveyed by GAMA Energy A.Ş., which contributed to the report. All data and information within the scope of this Report have not been independently verified and have been prepared for informational purposes only and do not serve as a basis for any investment decision. The information contained in this Report does not constitute an invitation to buy/sell the shares of GAMA Enerji A.Ş., and such a legal relationship is not deemed to have been established with the publication of this Report. It is believed that all the information and documents given as of the preparation date of the Report are correct, and the information has been disclosed in good faith and is based on reliable sources. GAMA Energy Inc. and ESG Turkey Danışmanlık make no representations or commitments regarding the accuracy or completeness of the information contained in this Report. GAMA Enerji A.Ş and ESG Turkey Danışmanlık, including forward-looking statements, regarding any statement or statement, expressly or implicitly, incomplete information or other written and verbal communications shared or made available, contained in this Report, does not accept any responsibility and liability. GAMA Enerji A.Ş. and ESG Turkey Consulting or its directors, managers, employees or third parties cannot be held responsible in any way.



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