NUH ÇİMENTO GROUP TSRS COMPLIANT SUSTAINABILITY REPORT

2025

AllTogether

NUH ÇİMENTO SANAYİ A.Ş. AND ITS AFFILIATES' SUSTAINABILITY REPORT
FOR THE FINANCIAL YEAR 1 JANUARY-31 DECEMBER 2025
IN COMPLIANCE WITH TURKISH SUSTAINABILITY REPORTING STANDARDS

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ABOUT OUR REPORT

Reporting Period and Standards

This report, which presents our sustainability and climate performance for 2025, has been prepared in accordance with TSRS 1 General Requirements for Description of Financial Information Relating to Sustainability and TSRS 2 Climate Descriptions standards, published by the International Sustainability Standards Board of the IFRS Foundation in 2023 and became mandatory in our country under the name Turkish Sustainability Reporting Standards (TSRS) as of January 1, 2024.

Scope of Our Report

The information contained in this report should be evaluated within a comprehensive framework, taking into account the interrelationships with the Nuh Çimento Group Consolidated Financial Statements and Independent Auditor's Report ("Financial Report") for the period from January 1, 2025, to December 31, 2025, unless otherwise specified. This report is a consolidated sustainability report prepared on behalf of Nuh Çimento Sanayi A.Ş. and its subsidiaries. The environmental, social, and governance data presented in this report, including greenhouse gas measurements, also includes the performance data of Çim-Nak Taşımacılık Ltd. Şti., a subsidiary of Nuh Çimento Sanayi A.Ş., for the relevant period, and the calculation results are shown within Nuh Çimento's data. These data have been included in Nuh Çimento's data solely within the scope of numerical consolidation, and the risk and opportunity analyses, strategic objectives, and governance structures of these subsidiaries in the context of sustainability have not been evaluated separately. KSO Enerji A.Ş. and Çimpaş Çimento ve İnşaat Malzemeleri Paz. A.Ş., which are classified as long-term financial investments in the consolidated financial statements and are not subject to full consolidation, have been excluded from this reporting period due to the Group's lack of financial control over these subsidiaries.

Approval of Board of Directors and Senior Management

The risks and opportunities explained in the report were reviewed and approved by the board of directors, senior management and relevant committees in the first quarter of 2026, which is the preparation period of our report.

Transition Provisions and Exemptions Utilized

Our report will be published on the same date as our 2025 financial statements. In accordance with the board decision published by the KGK (Public Oversight, Accounting and Auditing Standards Authority), the exemptions in Articles E4(a), E5, and E6 of TSRS 1 Transition Provisions, which remain valid in 2025, have not been utilized.

Fair Presentation

The financial and non-financial information presented within the scope of the report has the qualities of comparability, verifiability, timeliness and understandability and is presented accurately in line with the principles set out in TSRS.

Changes After the Reporting Period

There are no transactions, other events or changing conditions occurring after the end of the reporting period and before the date on which the financial Descriptions related to sustainability and climate change are published that could reasonably affect the decisions that primary users of general-purpose financial reports would make on the basis of this report.

Currency Used in Report Presentation

The presentation currency used in financial Descriptions related to sustainability and climate change and the currency used in the consolidated financial statements of Nuh Çimento Group is the Turkish lira ("TL") and the units used are consistent with each other.

Financial Materiality

The financial materiality level was determined by considering the potential effect of climate risks and opportunities on EBITDA, one of the Company's key financial indicators. In this context, these financial effects were assessed in terms of their potential to influence users' expectations and decisions regarding the Company's future cash generation capacity.

Statement of Compliance

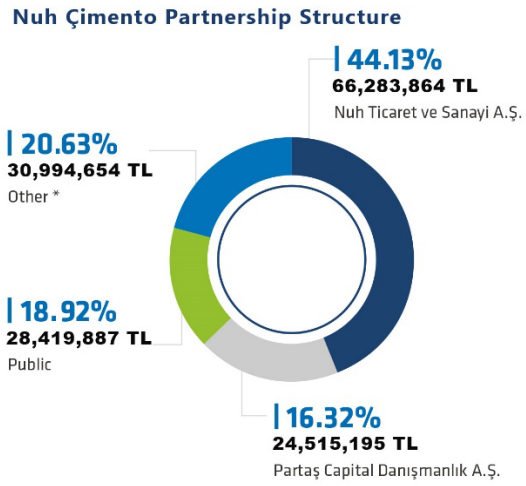
Our financial Descriptions regarding sustainability and climate change ensure clear and unconditional conformity with all provisions of the TSRS.

ABOUT OUR COMPANY

Our Group Companies and Partnership Structure

Our Group Companies	Our Activities	Share (%)	Partnership Type
Nuh Beton A.Ş.	Ready-Mix Concrete Production and Marketing	100	Subsidiary
Nuh Yapı Ürünleri A.Ş.	Lime, Aerated Concrete Production and Marketing	100	Subsidiary
Çim-Nak Taşımacılık Ltd. Şti.	Extraction, Loading, Transportation, Ship Agency	100	Subsidiary
Çimpaş Çimento ve İnşaat Malzemeleri Pazarlama A.Ş.	Cement Marketing	12.07	Participation

Nuh Çimento Partnership Structure

44.13% **66,283,864 TL** Nuh Ticaret ve Sanayi A.Ş.	
18.92% **28,419,887 TL** Public shares	
16.32% **24,515,195 TL** Partaş Capital Danışmanlık A.Ş.	
20.63% **30,994,654 TL** Other *	

** Non-public shareholders whose partnership share is less than 5 percent. (31.12.2025)*

Nuh Çimento Group in Figures

Nuh Çimento

441,000 m² Our Integrated Production Facility	**SASB Operational Metrics** **4,233,500 tons/year** Our Cement Production
57,000 m² Our Cargo Port Serving Ships	**4,494,000 tons/year** Our Clinker Production
50+ Countries We Export To	

Nuh Beton

Locations • Istanbul • Kocaeli • Sakarya • Bursa	**Equipment** **198** Trans Mixers **76** Mobile Pumps	**Facilities** Connected to Each Other via Online Data Lines **15** Fully Equipped Plants Computer-Controlled and Fully Automated **21** Concrete Plants	**SASB Operational Metrics** Our Ready-Mix Concrete Production **1,794,219 m³/year**

Nuh Yapı Ürünleri

Locations Kocaeli Hereke **Facilities** Lime Factory Aerated Concrete Factory Aluminum Paste Production Facility Alfa Plaster Production Facility Magnesium Oxide Production Facility Magnesium Milk Production Facility	**Markets** Türkiye, Europe, North America, South America, Asia, Africa, Northern Cyprus **Our Brand Registered Products Developed Through R&D Studies:** • Aerated Concrete Thermal Insulation Board - Termoküp™ • Aluminum Paste - Alupore™ • Alfa Gypsum and Anhydrite Products - Nuh Alçı™ • Nuh Dental Plaster • Nuh Hobby Plaster • Nuh Decoration Plaster • Nuh Agricultural Lime	**SASB Operational Metrics** • Alpha Gypsum Production: **3,432 tons/year** • Anhydrite Gypsum Production: **69 tons/year** • Micronized Gypsum Production: **165 tons/year** • Lime (Slaked) Production: **59,811 tons/year** • Lime (Quick) Production: **110,684 tons/year** • Furnace Production: **157,411** • Aerated concrete: **497,192 m³/year** • Aluminum Paste: **730 tons/year**

Nuh Çimento Group Value Chain

Nuh Çimento

Value Chain Layer	Main Value Chain Elements	Description	Geographic Scope
Upstream	**Regulatory and Supervisory Institutions**	Public authorities such as the Turkish Republic Ministry of Environment, Urbanization and Climate Change, KGK (Public Oversight, Accounting and Auditing Standards Authority), SPK (Capital Markets Board of Türkiye), EPDK (Energy Market Regulatory Authority) and MAPEG (General Directorate of Mining and Petroleum Affairs) direct the environmental, social and governance performance of our activities and ensure the implementation of international reporting frameworks (IFRS S1 & S2) within the scope of TSRS'.	Türkiye
Upstream	**Raw Material Production**	**Mining Site Operations** Drilling Blasting Transportation of Raw Materials	Türkiye
Own Operations	**Clinker and Cement Production**	**Operations** Crushing-Homogenizing Grinding-Cooking Cooling **Intermediate Product:** Clinker Grinding -Storage Packaging **Main Product:** Cement	Türkiye
Downstream	**Customers**	Marketing and Sales Shipping and Delivery **Customer Groups** • Dealers • Ready-Mix Concrete Producers • Industrial Manufacturers • Construction Companies • Contractors • Export Customers	Türkiye and Export Markets

Nuh Beton

Value Chain Layer	Main Value Chain Elements	Description	Geographic Scope
Upstream	**Regulatory and Supervisory Institutions**	Public authorities such as the Turkish Republic Ministry of Environment, Urbanization and Climate Change, KGK (Public Oversight, Accounting and Auditing Standards Authority), DSİ (State Hydraulic Works), EPDK (Energy Market Regulatory Authority), TSE (Turkish Standards Institute) and MAPEG (General Directorate of Mining and Petroleum Affairs) direct the environmental, social and governance performance of our activities and ensure the implementation of international reporting frameworks (IFRS) within the scope of TFRS'.	Türkiye
Upstream	**Raw Material Supply**	• Water, Aggregate, Cement, Chemical and Mineral Additives • Transportation from Raw Material Sources • R&D Activities	Türkiye
Own Operations	**Concrete Production**	• Raw Material Stock Management/Storage • Production • Shipment • R&D	Türkiye
Downstream	**Customers**	Marketing and Sales / Shipping and Delivery **Customer Groups** • Construction Companies • Contractors • Industrial Manufacturers	Türkiye

Nuh Yapı Ürünleri

Value Chain Layer	Main Value Chain Elements	Description	Geographic Scope
Upstream	**Regulatory and Supervisory Institutions**	Public authorities such as the Turkish Republic Ministry of Environment, Urbanization and Climate Change, KGK (Public Oversight, Accounting and Auditing Standards Authority), DSİ (State Hydraulic Works), EPDK (Energy Market Regulatory Authority), TSE (Turkish Standards Institute) and MAPEG (General Directorate of Mining and Petroleum Affairs) direct the environmental, social and governance performance of our activities and ensure the implementation of international reporting frameworks (IFRS) within the scope of TFRS'.	Türkiye
Upstream	**Suppliers**	**Aerated Concrete:** Purchasing and Transportation of Sand, Cement, Gypsum, Pallet, Aluminum Powder/Paste, Domestic/Imported Lignite **Lime:** Limestone, Petroleum Coke, Pallet, Big Bag Purchasing and Shipping **Aluminum Paste:** Aluminum Foil, Atomized Powder, Pallet Chemical Additive Purchasing and Transportation	Türkiye
Own Operations	**Production**	**Aerated Concrete:** Casting - Molding - Cutting - Autoclaving - Separation/Palletizing - Packaging - Storage **Lime:** Energy – Crushing – Screening – Kiln – Slaking – Packaging – Storage **Aluminum Paste:** Cutting Mill/Grinding – Screening – Filter Press – Packaging – Storage	Türkiye
Downstream	**Customers**	Marketing and Sales / Shipping and Delivery **Customer Groups** • Dealers • Construction Companies • Contractors • Export Customers	Türkiye and Export Markets

GOVERNANCE

Governance Structure

Governance		
TSRS 1	**TSRS 2**	
27.a	**6.a**	**Governance body, body responsible for overseeing climate-related risks and opportunities, person(s)**
		Nuh Çimento Board of Directors is responsible for the oversight and effective and efficient management of the risks and opportunities that form the basis of sustainability and climate-related financial Descriptions to be made within the scope of TSRS 1 and TSRS 2. To enable the early identification of issues that could jeopardize the company's existence, growth, and business continuity, to take the necessary measures, and to manage risks and transform them into opportunities through effective practices, the company has established Sustainability and Climate Committees comprising representatives from the companies included in the consolidated financial statements. These committees report to the board of directors through the Sustainability Strategies Executive Committee. The main objective of this structure is to analyze the physical risks arising from climate change, the conditions of our country, possible transition risks related to the sector, and risks related to resource dependency, and to create the necessary action plans in terms of risk and crisis management. The governance structure is detailed in the table on the following page.
27.a.i	**6.a.i**	**Reflection of responsibilities in job descriptions, authorities and job descriptions**
		Although responsibilities related to sustainability and climate-related risks and opportunities are not directly reflected in the task descriptions, authorities and job descriptions of the individuals on the committees, task descriptions have been established for the committees. Considering the identified risks and opportunities, the duties and job descriptions of the relevant persons will be updated before the next reporting period.
27.a.i	**6.a.i**	**Reflection of responsibilities in policies applicable to this body and person/persons**
		We have separate policies for each of the risk areas we assess within the scope of sustainability and climate. All of our policies are approved by our General Manager before they are published on our website. Our policies regarding the risks and opportunities we have identified are listed below. **Nuh Çimento Group Environmental Policy:** Sustainability and Environment Management is responsible for preparing this policy and revising it due to changes that may occur in current conditions, and all units are responsible for its implementation. **Nuh Çimento Group Energy Efficiency Policy:** Sustainability and Environment Management is responsible for the preparation of this policy and its revision due to changes that may occur in current conditions, while the Production Group Management, Maintenance Group Management, Energy Executive, Sustainability and Environment Management, and Energy Services Chief are responsible for its implementation. **Nuh Çimento Group Emission Policy:** Sustainability and Environment Management are responsible for the preparation and revision of this policy due to changes that may occur in current conditions and the Cement Production Management, Clinker Production Management, and Sustainability and Environment Management are responsible for its implementation. **Nuh Çimento Group Climate Change Combat and Adaptation Policy:** Sustainability and Environment Management is responsible for preparing this policy and revising it due to changes that may occur in current conditions, and the Sustainability and Environment Management and General Manager are responsible for its implementation.

27.a.ii	**6.a.ii**	**The skills and competencies of the competent body person(s) to respond to risks and opportunities and to oversee the designed strategies**
		The individuals who form the Board of Directors and executive committees of our group companies have been selected due to their positions, experience and related competencies in departments related to risk and opportunity issues. They have the appropriate skills and competencies to respond to risks and opportunities and to oversee designed strategies.
27.a.ii	**6.a.ii**	**Evaluation of the adequacy of competencies and areas of development**
		The committees at Nuh Çimento Group companies are composed of individuals with expertise in climate and sustainability. The activities of our committees are conducted under the Nuh Çimento umbrella, and we do not have a specific competency assessment process for committee members. The individuals serving on our committees possess sufficient experience, based on their internal roles, to identify and review relevant risks and opportunities, plan necessary actions, and monitor performance. When forming the committees, members were selected from among managers who possess sustainability expertise and the capability to analyze the production and maintenance processes of the relevant companies. In 2025, two environmental engineers serving on the Nuh Çimento Sustainability and Climate Committee completed the Corporate Sustainability Reporting Expertise (KSRU) training, and one of them qualified to obtain the KSRU certification. One environmental engineer from the Nuh Yapı Ürünleri Sustainability and Climate Committee also completed the KSRU training, while a geophysics engineer from the Nuh Beton Sustainability and Climate Committee was informed through internal training programs.

NUH ÇİMENTO SUSTAINABILITY AND CLIMATE COMMITTEE STRUCTURE

ORGANIZATIONAL STRUCTURE	SCOPE OF RESPONSIBILITY	FREQUENCY OF MEETING	MEMBERS
Board of Directors	- It approves the vision, strategy, risks and opportunities related to sustainability and climate change. - It approves policies and frameworks related to sustainability and climate change. - It approves investments related to sustainability and climate change.	Once a Year	Board of Directors
Sustainability Strategies Executive Committee	- It evaluates risks and opportunities related to sustainability and climate change and submits them to the Board of Directors for approval. - It develops policies and frameworks related to sustainability and climate change and submits them to the Board of Directors for approval. - It approves sustainability and climate transition plans, targets, projects and submits investment projects to the Board of Directors for approval.	Once a Year	CEO, General Managers, CFO, HR Director, Purchasing Director, Sustainability and Environment Manager
Sustainability and Climate Committee - Nuh Çimento	- It studies risks and opportunities related to sustainability and climate change and reports to the Sustainability Executive Committee. - It establishes and coordinates working groups. - It sets sustainability and climate change targets, tracks progress and reports regularly. - Follows up on project implementations initiated to achieve targets. - Plans studies to raise sustainability awareness among internal and external stakeholders of companies.	Twice a Year	Production Managers, Maintenance Managers, Purchasing Manager, Sales Marketing Managers/Chiefs, Quality and R&D Manager, Nuh Gayrimenkul Manager, OHS Manager, Port Manager, HR Executive, Financial Risk and Investor Relations Executive, Climate Change and Environment Chief, Machinery Maintenance Chief, Çim-Nak Senior Mining Engineer, Sustainability and Environment Manager
Sustainability and Climate Committee - Nuh Beton	- It studies risks and opportunities related to sustainability and climate change and reports to the Sustainability Executive Committee. - It establishes and coordinates working groups. - It sets sustainability and climate change targets, tracks progress and reports regularly. - Follows up on project implementations initiated to achieve targets. - Plans studies to raise sustainability awareness among internal and external stakeholders of companies.	Twice a Year	Regional Managers, Maintenance and Repair Manager, Purchasing Manager, Quality and R&D Manager, Management Systems and OHS Executive
Sustainability and Climate Committee - Nuh Yapı Ürünleri	- It studies risks and opportunities related to sustainability and climate change and reports to the Sustainability Executive Committee. - It establishes and coordinates working groups. - It sets sustainability and climate change targets, tracks progress and reports regularly. - Follows up on project implementations initiated to achieve targets. - Plans studies to raise sustainability awareness among internal and external stakeholders of companies.	Twice a Year	Production Manager, Maintenance and Support Operations Manager, Senior Purchasing Specialist, Sales and Marketing Chiefs, Quality and Management Systems Manager, Sustainability and Environment Executive, R&D Manager, Administrative and Social Affairs Chief, Financial Affairs Senior Specialist

Board of Directors Competency Matrix-Field Experience	Total Number: 14	Ratio
Business Life (15+ years)	14	100%
Financial Services Experience	3	21%
Non-Finance Real Sector Experience	7	50%
Public Experience	3	21%
Technology/Informatics	2	14%
Capital Markets Board Experience	2	14%
Experience in International Finance and Trade	3	21%
Experience with IPOs, Mergers and Acquisitions	1	7%
Educational Status	**Number**	**Ratio**
Bachelor's Degree	13	93%
Master's Degree	8	57%
Doctorate	1	7%

TSRS 1	TSRS 2	
27.a.iii	**6.a.iii**	**The manner and frequency with which the competent body and person(s) are informed about risks and opportunities**
		The Nuh Çimento, Nuh Beton and Nuh Yapı Ürünleri sustainability sommittees meet twice a year to review sustainability and climate-related performance and report progress to the Sustainability Strategies Executive Committee twice a year.
27.a.iv	**6.a.iv**	**How the competent body considers climate-related risks and opportunities**
		Nuh Çimento Group has designed its corporate strategy by considering the risks and opportunities it has identified related to sustainability and climate change and has begun developing policies accordingly. The Board of Directors considers these risks and opportunities when making important investment decisions.
27.a.iv	**6.a.iv**	**The competent body, person/persons evaluating the trade-offs associated with risks and opportunities**
		The Nuh Çimento Group Board of Directors considers trade-offs when determining its strategies and actions regarding risks and opportunities related to resource dependency and climate change. Although the expenditures made for technological investments to be made within the scope of the climate transition plan prepared to reduce carbon emissions will reduce the current year's profit, they will also reduce the emission taxes that our company is likely to pay in the long run.
27.a.v	**6.a.v**	**Setting and supervising goals and monitoring progress towards goals**
		The governance structure that identifies sustainability and climate-related risks and opportunities also sets the relevant targets and monitors these targets through regular review meetings as outlined in the governance structure diagram. Environmental, Social, and Governance (ESG) performance metrics are incorporated into the KPIs of the individuals responsible for carrying out the activities necessary to achieve these targets. However, there is no compensation policy directly linked to sustainability and climate-related performance metrics.
27.b.i	**6.b.i**	**Delegation and oversight of responsibilities for monitoring, managing and controlling risks and opportunities**
		Monitoring, management and auditing of sustainability and climate-related risks and opportunities in Nuh Çimento Group has been transferred to the Nuh Çimento Sustainability and Climate Committee. See: ***Nuh Çimento Sustainability and Climate Committee Structure*** diagram
27.b.ii	**6.b.ii**	**Controls and procedures used to support oversight of risks and opportunities and how they integrate with internal functions**
		To assess sustainability and climate-related risks and opportunities, we maintain comprehensive inventories that assess their magnitude, likelihood, and potential financial effects for each of our group companies. These inventories were developed with contributions from various internal functions.

RISK MANAGEMENT

Process of Identifying Risks and Opportunities Related to Sustainability and Climate Change

Risk Management		
TSRS 1	**TSRS 2**	
44.a	**25.a.**	**Processes and related policies used to identify, assess, prioritize and monitor sustainability and climate-related risks**
44.a.i	**25.a.i**	**Inputs and parameters used to identify, assess, prioritize and monitor sustainability and climate-related risks**
		At Nuh Çimento, when assessing our risks, we monitor not only internal risks but also global changes; we also consider external factors, including global issues, sectoral trends, and potential regulatory changes. Before assessing our company-specific risks and opportunities, we considered the results of the Cement Industry Risk and Opportunity Analysis conducted by the Cement, Glass, Ceramics and Soil Products Exporters' Association (ÇCSİB), whose workshops we, Nuh Çimento, participated in and whose work was completed by the end of 2023. We evaluated nearly 40 risks and 15 opportunities. These risks and opportunities were prepared by considering the expectations of the European Green Deal, the World Benchmarking Alliance, the World Economic Forum, the SASB Sustainability Accounting Standards Board Construction Materials Sector Standards, and the TCFD Task Force on Climate-related Financial Descriptions. In this study, we primarily considered the risks identified as high risk for the entire sector and evaluated these issues in separate inventories for Nuh Çimento, Nuh Yapı Ürünleri and Nuh Beton by assigning effect and probability scores and grading them on a five-point scale from very low to very high according to the corresponding financial effect.
44.a.ii	**25.a.ii**	**Scenario analysis to identify risks**
		To identify climate-related risks, we conducted a detailed review of the scenarios most used in the construction materials sector, particularly cement, and considered the climate scenarios used internationally in the sector when assessing our risks and opportunities. We have included detailed information about climate scenarios in the answer to question **22.b**.
44.a.iii	**25.a.iii**	**Assessment of the nature, probability and magnitude of the effects of risks**
		We evaluated the nature, likelihood and magnitude of the effects of these risks on a 5-level scale. We also examined the effect criteria under separate definitions as compliance, strategy, reputation, financial and operational effect. We examined the likelihood scale within the scope of definitions of almost certain, probable, possible, remote and very remote probability. The quantitative thresholds we use for Financial Effect are as follows. (Losses and Increased Costs) Very High: Over 197 million TL High: Between 79-197 million TL Medium: Between 20-79 million TL Low: Between 10-20 million TL Very Low: Less than 10 million TL

44.a.iv	**25.a.iv**	**Prioritizing risks over other types of risks**
		We assess sustainability and climate-related risks separately from other types of risks. The factors that prioritize each risk are its likelihood and effect on financial outcomes.
44.a.v	**25.a.v**	**How risks are monitored**
		See: ***Nuh Çimento Sustainability and Climate Committee Structure*** diagram
44.a.vi	**25.a.vi**	**Changed processes compared to the previous reporting period**
		This is our first TSRS report. The process differences we implemented compared to the Integrated Annual Report we published in previous years are detailed in the answer to question 44c.
44.b		**Processes used to identify, assess, prioritize and monitor sustainability opportunities**
		We did not use scenario analysis to identify sustainability opportunities. We assessed risks to human and water resources within the context of resource dependency. In this assessment, we determined that the risks associated with these issues had a moderate financial effect. We also evaluated opportunities on the same five-point impact-probability and financial effect scale. We did not identify any opportunities with a high or higher financial effect related to these issues or any other issue.
	25.b	**Processes used to identify, assess, prioritize and monitor climate-related opportunities**
		When identifying climate-related opportunities, we used the same scenarios we considered when identifying risks. We have included details of these in the Strategy and Climate Resilience section of our report **(22.a and 22.b)**.
44.c	**25.c**	**Integration of sustainability and climate-related risks and opportunities with the overall risk management process**
		At Nuh Çimento, we assess risks under three main headings: financial, operational, and strategic. We manage occupational health and safety, environmental risks, information security, and external risks within the scope of operational risks. Strategic risks, on the other hand, include sales, supply chain, investment, project, and compliance risks that could hinder our short-, medium-, and long-term strategies. Meanwhile, at Nuh Çimento in 2023, our consultant prepared a comprehensive risk and opportunity survey aligned with the TCFD Framework and CDP Climate Change Program reporting. We conducted an online survey with representatives from senior management, as well as our managers and executives, assessing potential physical and transition risks and opportunities arising from climate change. Nine of the 14 risks listed were in the high-effect and high-probability category, common across all groups. We conducted this assessment separately from our overall risk management processes. As part of the TSRS reporting, we assessed the risks and opportunities of our Nuh Çimento, Nuh Beton, and Nuh Yapı Ürünleri companies in 2025, specifically focusing on sustainability and climate change, within a broader committee structure with expertise in these areas. This enabled us to separately assess the risks and opportunities of all our companies included in the consolidated financial statements, and we have detailed the common and individual risks and opportunities under the strategy sections (sustainability and climate) of our report.

STRATEGY

Our Sustainability Strategy

Risks and Opportunities Related to Strategy/Sustainability	
TSRS 1	
29.a 30.a	**Sustainability risks and opportunities that could reasonably be expected to affect the future financial viability of the company**
	As a result of our sustainability risk analysis at Nuh Çimento Group companies, none of the "Legal Risks and Compliance", "Talent Management", "Health and Safety" and "Decrease in Water Quality and Water Resources" risks we assessed fell into the HIGH financial effect risk category. However, since the risk of "Decrease in Water Quality and Water Resources" falls into the high-risk category in terms of probability at Nuh Çimento, we have included this risk in our report.
30.c	**The company's definitions of short-, medium- and long-term periods and how these definitions relate to the planning periods used when making strategic decisions**
	Short term: 0-2 years (It is related to planning periods during which direct operational impacts are assessed.) Medium Term: 2-5 years (It is related to investment processes, borrowing, loans, and similar matters.) Long term: 5-20 years (It is related to strategic goals (such as the carbon neutrality goal).)

	Risk Name We Assessed	**Nuh Çimento**		**Nuh Beton**		**Nuh Yapı Ürünleri**	
		Likelihood	**Financial Effect**	**Likelihood**	**Financial Effect**	**Likelihood**	**Financial Effect**
SR1	Decrease in Water Quality and Water Resources	High	Medium	Medium	Very Low	Medium	Very Low
	Talent Management	Very Low	Medium	Very Low	Low	Very Low	Medium
	Health and Safety	Medium	Low	Low	Low	Medium	Low
	Legal Risks and Compliance	Low	Low	X	X	Low	Very Low
	Opportunity Name We Assessed	**Nuh Çimento**		**Nuh Beton**		**Nuh Yapı Ürünleri**	
	Since the opportunities we identified in our opportunity inventory study are mainly related to climate change, we included the details of these opportunities under the title of climate strategy.						

Sustainability Risk-1		
TSRS 1		
29.a **30.a**	**SR1- Decrease in Water Quality and Water Resources (Nuh Çimento)**	Risk of disruption in operational processes due to reduction in water resources and quality
30.b	**Maturity of the Risk**	Short
29.b **32.a**	**Current and Anticipated Effects on the Business Model**	In cement production, water is used extensively for cooling processes. It is also consumed throughout the site to keep dust down and for human needs. The hardness and salinity parameters of our water resources are steadily increasing with implications for sustainability.
29.b **32.a**	**Current and Anticipated Effects on the Value Chain**	If production costs increase, these costs may be reflected in sales prices. This may cause a change in product preferences among customers.
32.b	**Concentrated Regions**	Direct Operations
Financial Effects of Risk		
29.d **34.a** **35.a**	**Current Financial Effects**	There is no current financial effect.
29.d **34.b**	**Short-Term Financial Effects**	Due to the decrease in water quality and increase in conductivity of the Marmara Sea which supplies water to the seawater desalination system, there may be significant increases in water production costs.
29.d **34.b**	**Medium-Term Financial Effects**	Due to the decrease in water quality and increase in conductivity of the Marmara Sea which supplies water to the seawater desalination system, there may be significant increases in water production costs.
29.d **34.b**	**Long-Term Financial Effects**	In 2008, the conductivity value of the Marmara Sea was 27,500 microsiemens, by 2025 this value increased to an average of 50,000 microsiemens. If pollution continues at the same rate, this figure is expected to reach 60,000 microsiemens by 2030. This situation could increase water production costs from 82.6 TL/cubic meter to 100 TL/cubic meter, resulting in a financial impact of 21,600,000 TL.

Strategy and Decision-Making	
TSRS 1	
29.c 33	**The effects of sustainability-related risks and opportunities on our strategy and decision-making**
33.a	**How we respond to sustainability-related risks and opportunities in our strategy and decision-making mechanisms and plans**
	SR1- Decrease in Water Quality and Water Resources (Nuh Çimento) • We try to manage water resources efficiently by calculating our water footprint. • We monitor our water recovery rates and water consumption and strive to improve our performance. **SR1- Decrease in Water Quality and Water Resources (Nuh Beton ve Nuh Yapı Ürünleri)** At Nuh Beton, this risk has been assessed as having medium likelihood and very low financial impact. At Nuh Yapı Ürünleri, this risk has been assessed as having medium likelihood and very low financial impact.

TSRS 1	
33.b	**Progress on plans we announced in previous reporting periods**
	SR1- Decrease in Water Quality and Water Resources (Nuh Çimento) Our two-year data on water withdrawal and consumption can be found on page 47 of this report.
33.c	**Trade-offs between risks and opportunities related to sustainability**
	At Nuh Çimento Group, we consider trade-offs between risks and opportunities related to sustainability. In 2025, we invested in water recovery to protect water resources in the long term.

TSRS 1	Quantitative and Qualitative Information
35.b	**Sustainability-related risks and opportunities that have a significant risk of requiring a significant adjustment to the book values of assets and liabilities reported in the relevant financial statements in the next financial reporting period**
	There are no sustainability-related risks and opportunities that pose a significant risk of requiring a significant adjustment in the next financial reporting period.
35.c	**Expected changes in financial position in the short, medium and long term, considering the strategy to manage sustainability-related risks and opportunities**
35.c.i	**Investment and divestiture plans, including plans that are not contractually committed**
	Given our strategy to manage sustainability-related risks and opportunities, we have no investment or divestment plans.
35.c.ii	**Planned financing sources to implement the strategy**
	The company's strong cash flow provides significant flexibility in financing its strategic objectives. Within this framework, its primary financing sources are equity and existing cash reserves. The current cash structure allows us to maintain operational independence and minimize interest/expense risks. In summary, our companies do not need financing in the short or medium term.
35.d	**Expected changes in financial performance and cash flows in the short, medium and long term, given the strategy to manage sustainability-related risks and opportunities**
	Given our strategy for managing sustainability-related risks and opportunities, we do not expect a significant change in our financial position in the short, medium, or long term due to the risks we have identified. This is primarily due to the medium level of risk involved in these matters. Although the effect of these factors on financial performance is limited, they are becoming increasingly measurable. Despite the expectation that risks will be managed more effectively in the coming years due to the possibility of three different risks with medium financial effect in the short, medium and long term, no significant change is expected in the company's profitability, cash flow and liquidity structure.
40.a	**Why quantitative information is not provided**
	A figure has not been given because the need for a specific financing source has not been identified.
40.b	**Qualitative information on financial effects**
	Our sustainability risk and opportunity analysis identified one risk and no opportunities. Water treatment investments and increases in operational costs that may arise in the event of restricted access to water resources can affect both production costs and the investment amounts that may be included in fixed assets. This risk is monitored in line with the company’s sustainability strategies, and its direct and indirect effects can be tracked in the financial statements.
40.c	**Quantitative information on the combined financial effects of a sustainability-related risk or opportunity**
	Effective risk management and rapid evaluation of opportunities are critical for financial stability and sustainable growth. Considering the combined effect of sustainability-related risks and opportunities, we do not expect significant changes in our company's financial performance, as the risks have been identified as medium and no opportunities have been identified.

Strategy/Resilience	
TSRS 1	
29.e 41	**Assessment of the resilience of the strategy and business model to sustainability-related risks**
	At Nuh Çimento Group, both risks and opportunities are heavily related to carbon management. The sustainability risks we assessed are medium because the calculated financial effects are also medium.
41	**How the evaluation is conducted and the timeframe**
	We evaluated the resilience of our group companies to sustainability-related risks through our risk inventory with the committees in our companies, our Financial Risk and Investor Relations Executive, and our CFO. We completed our assessment through our risk inventory, which we finalized with our General Manager. We conducted our assessment in different periods throughout 2025.

Our Strategy for Struggling and Adapting to Climate Change

Strategy/Climate-Related Risks and Opportunities	
TSRS 2	
10.d	**The company's definitions of short-, medium- and long-term periods and how these definitions relate to the planning periods used when making strategic decisions**
	Short term: 0-2 years Medium term: 2-5 years Long term: 5-20 years These maturities are the same as the maturities and planning periods used by Nuh Çimento when making strategic decisions.

	Name and Type of Risk We Assessed (Physical)	**Nuh Çimento**		**Nuh Beton**		**Nuh Yapı Ürünleri**	
		Likelihood	**Financial Effect**	**Likelihood**	**Financial Effect**	**Likelihood**	**Financial Effect**
CR1	Extreme Weather Events	Low	High	X	X	Low	Medium
CR2	Decrease in Water Resources	High	High	X	X	X	X
	Precipitation Change	X	X	X	X	Medium	Low
	Temperature Change	X	X	Very Low	Very Low	X	X
	Name and Type of Risk We Assessed (Transition)	**Nuh Çimento**		**Nuh Beton**		**Nuh Yapı Ürünleri**	
		Likelihood	**Financial Effect**	**Likelihood**	**Financial Effect**	**Likelihood**	**Financial Effect**
CR3	Transition to Lower Emission Technology and Digitalization (Technological)	Very low	Very High	X	X	X	X
CR4	Transition to Carbon-Focused Regulations (Legislative Compliance)	Low	High	X	X	Low	Medium
CR5	Availability of Raw Materials and Additives (Market)	X	X	High	Medium	X	X
	Changes in the Financial Market	Low	Medium	X	X	Low	Medium
	Change in Stakeholder Preferences (R&D)	Very low	Medium	X	X	X	X
	Change in Stakeholder Preferences (Customer)	Very low	Medium	X	X	X	X
	Legal Risks and Compliance	Very low	Very Low	X	X	Very Low	Very Low

Climate-Related Risks

Climate-Related Risk-1		
TSRS 2		
9.a **10.a**	**CR1- Extreme Weather Events (Nuh Çimento)**	Risk of supply chain disruptions due to extreme weather events
10.b	**Type of Risk (Physical/Transitional)**	Physical-Acute
10.c	**Maturity of the risk**	Long
9.b **13.a**	**Current and Anticipated Effects on the Business Model**	Trade logistics and supply chain effects may occur.
9.b **13.a**	**Current and Anticipated Effects on the Value Chain**	Climate-related extreme weather events can create disruptions in maritime trade, particularly fuels sourced from international markets. Furthermore, long-term disruptions to domestic supplies may occur, and alternative solutions may lead to increased production costs. While solutions can be found by evaluating alternatives for coal petroleum coke, and other materials, significant losses may occur during power outages.
13.b	**Concentrated Regions**	Upstream (Supply Chain)
Financial Effects of Risk (Medium)		
9.d **15.a** **16.a**	**Current Financial Effects**	There is no current financial effect.
9.d **15.b**	**Short-Term Financial Effects**	An examination of the government's current energy policies reveals no such risk in the short or medium term, based on published data. Long-term power shortages could occur due to increased electricity consumption driven by a shift away from fossil fuels and the closure of coal-fired power plants.
9.d **15.b**	**Medium-Term Financial Effects**	We do not expect any financial effect in the medium term.
9.d **15.b**	**Long-Term Financial Effects**	Due to potential energy supply shortages, the government may impose electricity supply outages or restrictions. In such cases, a power outage of approximately one week could occur. This outage would mean the entire factory shutting down production and could result in costs of approximately 86,4 million TL.

Climate-Related Risk-2		
TSRS 2		
9.a **10.a**	**CR2- Decrease in Water Resources (Nuh Çimento)**	Risk of losing access to clean water sources due to the decline in water resources Türkiye's Climate Risk Map clearly demonstrates a decrease in precipitation and an increase in temperature in the Marmara Region after 2020. Due to the group's location in the Marmara Region, increasing drought (changes in precipitation patterns) and falling groundwater levels pose a serious threat to the continuity of water resources.
10.b	**Type of Risk (Physical/Transitional)**	Physical-Chronic
10.c	**Maturity of Risk**	Short
9.b **13.a**	**Current and Anticipated Effects on the Business Model**	In cement production, water is used extensively for cooling processes. It is also consumed throughout the site to keep dust down and for human needs. Problems in water resources will affect the city's water policies, and this will lead to risks such as not allowing our current water resources to be used and only using seawater for treatment or using treated water in the sector, which will increase our water consumption costs.
9.b **13.a**	**Current and Anticipated Effects on the Value Chain**	If production costs increase, these costs may be reflected in sales prices. This may cause a change in product preferences among customers.
13.b	**Concentrated Regions**	Direct Operations
Financial Effects of Risk (Medium)		
9.d **15.a** **16.a**	**Current Financial Effects**	There is no current financial effect.
9.d **15.b**	**Short-Term Financial Effects**	During discussions with the General Directorate of the Kocaeli Water and Sewerage Authority (İSU), it was reported that this risk could materialize in the short term. Due to potential restrictions on drinking water resources, there is a risk that all water will be supplied from the sea. In such a scenario, the use of purified seawater would incur additional costs. This is expected to result in an additional cost of approximately 99,5 million TL.
9.d **15.b**	**Medium-Term Financial Effects**	The total cost over the medium term is approximately 149 million TL.
9.d **15.b**	**Long-Term Financial Effects**	The total cost over the long term is approximately 199 million TL.

Climate-Related Risk-3		
TSRS 2		
9.a 10.a	**CR3- Transition to Lower Emission Technology and Digitalization (Nuh Çimento)**	Risk of not being able to reduce emissions as a result of not implementing carbon capture technology
10.b	**Type of Risk (Physical/Transitional)**	Transition/Technological
10.c	**Maturity of Risk**	Long
9.b 13.a	**Current and Anticipated Effects on the Business Model**	Even if carbon capture technologies are feasible, there may be a risk of not being able to implement them. Limitations on storing captured carbon, lack of sufficient space required for carbon capture facilities, etc., could lead to a significant carbon burden if carbon capture is not implemented. Because of the ETS (Emissions Trading System) and CBAM (Carbon Border Adjustment Mechanism), our costs may increase.
9.b 13.a	**Current and Anticipated Effects on the Value Chain**	Not available.
13.b	**Concentrated Regions**	Direct Operations
Financial Effects of Risk (Very High)		
9.d 15.a 16.a	**Current Financial Effects**	There is no current financial effect.
9.d 15.b	**Short-Term Financial Effects**	Carbon capture technology in our country will develop in parallel with Europe after 2030. Therefore, this risk is not expected to materialize in the short and medium term.
9.d 15.b	**Medium-Term Financial Effects**	We do not expect any financial effect in the medium term.
9.d 15.b	**Long-Term Financial Effects**	The risk of failing to transition to carbon technologies could have very significant financial implications. Although we are unable to precisely quantify the cost associated with this risk due to the fact that the relevant legislation and government policies have not yet been finalized, we estimate that it will amount to approximately 200 million TL.

Climate-Related Risk-4		
TSRS 2		
9.a 10.a	**CR4- Transition to Carbon-Focused Regulations (Nuh Çimento and Nuh Yapı Ürünleri)**	The risk of carbon prices fluctuating and incurring high financial costs under carbon trading systems, carbon taxes, and future carbon-related regulations
10.b	**Type of Risk (Physical/Transitional)**	Transitional-Legal
10.c	**Maturity of Risk**	Long
9.b 13.a	**Current and Anticipated Effects on the Business Model**	Carbon trading will be on the agenda with the ETS in Türkiye. If carbon trading transactions are not managed properly and carbon emissions remain above average, significant costs could be incurred.
9.b 13.a	**Current and Anticipated Effects on the Value Chain**	Rising costs may be reflected in product prices.
13.b	**Concentrated Regions**	Direct Operations
Financial Effects of Risks (Medium)		
9.d 15.a 16.a	**Current Financial Effects**	There is no current financial effect.
9.d 15.b	**Short-Term Financial Effects**	Since this risk is expected to arise following the establishment of the ETS in Türkiye and the elimination or reduction of free allowances, no financial impact is expected in the short term.
9.d 15.b	**Medium-Term Financial Effects**	Since the elimination of free allowances is not expected in the medium term, no risk is expected in the long term.
9.d 15.b	**Long-Term Financial Effects**	The management of carbon trading could have a significant financial impact. However, since the relevant legislation and government policies have not yet been finalized, while we cannot precisely calculate the cost of this risk, we expect an impact of approximately 80 million TL.

Climate-Related Risk-5		
TSRS 2		
9.a 10.a	**CR5- Availability of Raw Materials and Additives (Nuh Beton)**	Risk of access to recyclable materials following increasing demand for sustainable resources
10.b	**Type of Risk (Physical/Transitional)**	Transition-Market
10.c	**Maturity of Risk**	Medium
9.b 13.a	**Current and Anticipated Effects on the Business Model**	Due to the increasing demand for mineral additives used instead of existing natural resources, the fact that the locations of concrete plants are far from the resources, and the increasing demand and limited resources, access to such renewable resources will become more difficult and the cost of the resources we access will increase.
9.b 13.a	**Current and Anticipated Effects on the Value Chain**	Different raw material suppliers may be needed.
13.b	**Concentrated Regions**	Direct Operations
Financial Effects of Risks (Medium)		
9.d 15.a 16.a	**Current Financial Effects**	There is no current financial effect.
9.d 15.b	**Short-Term Financial Effects**	Demand for such materials is expected to increase after the ETS, that is, after 2027. Therefore, we do not anticipate such a financial risk in the short term
9.d 15.b	**Medium-Term Financial Effects**	Insufficient supply due to increased demand will cause costs to rise. Due to the lack of access to mineral (fly ash) additives, there is a cost increase of 15 TL/m^3. This results in a cost increase of approximately 30 million TL/year.
9.d 15.b	**Long-Term Financial Effects**	Long-term financial effects may vary due to uncertainties.

Climate-Related Opportunities

	Opportunities We Assessed	Nuh Çimento		Nuh Beton		Nuh Yapı Ürünleri	
		Likelihood	**Financial Effect**	**Likelihood**	**Financial Effect**	**Likelihood**	**Financial Effect**
CO1	Transition to Low Emission Technology (Product)	Medium	Very High	Medium	Low	Medium	Low
CO2	Transition to Low Emission Technology (CO2 Reduction)	Very Low	Very High	Low	Very Low	X	X
CO3	Resource Efficiency (Energy)	High	High	Very Low	Very Low	X	X
	Resource Efficiency (Raw Material)	Medium	Medium	Very Low	Medium	Medium	Very Low
	Change in Stakeholder Preferences	Medium	Medium	X	X	X	X
	Changes in the Financial Market	Medium	Medium	X	X	X	X
	Increase in Reputation*	High	Very Low	X	X	Medium	Very Low

** Although the probability is high, we are not including it in the report because its effect is low.*

Climate-Related Opportunity -1		
TSRS 2	**Definition of Opportunity**	
9.a **10.a**	**CO1- Transition to Low Emission Technology (Product) (Nuh Çimento)**	The opportunity to access new markets through the transition to new and efficient technology and more sustainable products developed through R&D studies
10.c	**The Maturity of the Opportunity**	Medium
9.b **13.a**	**Current and Anticipated Effects on the Business Model**	Producing sustainable and low-carbon products at more affordable costs than existing competitors' products will always provide a profitability advantage in the market.
9.b **13.a**	**Current and Anticipated Effects on the Value Chain**	Customer demands may increase.
13.b	**Concentrated Regions**	Direct Operations
Financial Effects of the Opportunity (Very High)		
9.d **15.a** **16.a**	**Current Financial Effects**	There is no current financial effect.
9.d **15.b**	**Short-Term Financial Effects**	We do not expect any financial effect in the short term.
9.d **15.b**	**Medium-Term Financial Effects**	By implementing current R&D projects, low-carbon products will be available to market before our competitors. We can launch 100,000 tons of our new products at a 3,943 TL advantage. This is likely to generate an annual positive effect of approximately 394 million TL
9.d **15.b**	**Long-Term Financial Effects**	Long-term financial effects may vary due to uncertainties.

Climate-Related Opportunity-2		
TSRS 2		
9.a **10.a**	**CO2- Transition to Low Emission Technology (CO_2 Reduction) (Nuh Çimento)**	Implementation of carbon capture, reuse and storage studies
10.c	**The Maturity of the Opportunity**	Long
9.b **13.a**	**Current and Anticipated Effects on the Business Model**	There are serious limitations to carbon capture and reuse in our country. Leading the way by removing these constraints and implementing carbon capture and conversion into new products will provide a significant profitability advantage.
9.b **13.a**	**Current and Anticipated Effects on the Value Chain**	Customer demands may increase.
13.b	**Concentrated Regions**	Direct Operations
Financial Effects of the Opportunity (Very High)		
9.d **15.a** **16.a**	**Current Financial Effects**	There is no current financial effect.
9.d **15.b**	**Short-Term Financial Effects**	We do not expect any financial effect in the short term.
9.d **15.b**	**Medium-Term Financial Effects**	We do not expect any financial effect in the medium term.
9.d **15.b**	**Long-Term Financial Effects**	We can't calculate the profitability of this opportunity because the ETS, carbon fees, and government policies are not yet clear. However, we expect it to generate a financial effect of approximately 200 million Turkish Lira.

Climate-Related Opportunity-3		
TSRS 2		
9.a 10.a	**CO3- Resource Efficiency (Energy) (Nuh Çimento)**	Use of lower emission energy sources (fuel, electricity, etc.)
10.c	**The Maturity of the Opportunity**	Medium
9.b 13.a	**Current and Anticipated Effects on the Business Model**	The use of waste as alternative fuel, the use of biomass resources as alternative fuel, and the use of electricity from renewable energy sources will have a positive financial effect due to their low costs.
9.b 13.a	**Current and Anticipated Effects on the Value Chain**	There may be improvements in production and product costs.
13.b	**Concentrated Regions**	Value Chain – Upstream
Financial Effects of the Opportunity (High)		
9.d 15.a 16.a	**Current Financial Effects**	There is no current financial effect.
9.d 15.b	**Short-Term Financial Effects**	We do not expect any financial effect in the short term.
9.d 15.b	**Medium-Term Financial Effects**	When the returns on renewable electricity investments and solar power plant investments are calculated, we expect a positive financial effect of approximately 98,5 million TL per year.
9.d 15.b	**Long-Term Financial Effects**	Long-term financial effects may vary due to uncertainties.

Strategy and Decision-Making	
TSRS 2	
14.a	**Our plan to achieve the goals we have set, our plan to respond to climate-related risks and opportunities in our strategy and decision-making mechanism**
14.a.i	**Current and projected changes to the business model, including resource allocation, to address climate-related risks and opportunities**
	Since no financial risk defined as high or very high was identified for Nuh Çimento Group company Nuh Beton, there were no significant changes in its business model, including resource allocation, during the reporting period. At Nuh Çimento, there has been no significant change in the business model during this reporting period, as high-effect risks also present high-effect opportunities, and due to the actions already taken by our company and the progress made towards its targets. The changes envisaged within the scope of ongoing and planned strategic actions regarding the risks and opportunities identified in our group companies are listed below on a risk and opportunity basis. The very high financial risk at Nuh Çimento is **“Transition to Lower Emission Technology and Digitalization”**, which is a technological transition risk. - The sustainability committee is evaluating alternative reduction plans to address the risk of not being able to reduce emissions as a result of the failure to implement carbon capture technology. The risk of **"Transition to Carbon-Focused Regulations"** has been identified as low probability but high financial effect at Nuh Çimento. - At Nuh Çimento, we are making plans to reduce carbon emissions and carrying out the activities prepared in this context within the scope of **our 2050 Net Zero Carbon Roadmap**. - Our plans include evaluating processes that will reduce carbon emissions, purchasing raw materials from companies with low carbon emissions, and conducting R&D studies to develop environmentally friendly products. In addition, **“Availability of Raw Materials and Additives”** has been identified as a market transition risk at high level for Nuh Beton. - We are evaluating alternative scenarios regarding this risk in the Sustainability Committee. Nuh Çimento's sustainability committee addresses the problems that may arise in the supply chain due to physical risks such as **"Extreme Weather Events"**; - We evaluate and monitor critical raw materials from a sustainability perspective. To address the risk of **“Decrease in Water Resources”**; - We plan for the efficient management of water resources by calculating our water footprint. We regularly monitor water recovery rates and water consumption. When it comes to **the opportunities**; We expect the **"Transition to Low Emission Technology"** to have a very high financial effect at Nuh Çimento, both in terms of product development and CO_2 reduction. - At Nuh Çimento, we develop technologies, conduct new studies, and collaborate on carbon capture. We also conduct R&D and low-carbon production technologies to turn this risk into an opportunity. We are also exploring hydrogen technologies.

	Another subject that offers high financial opportunities at Nuh Çimento is **"Resource Efficiency"** within the scope of energy. - We are working on WHR, RES and HEPP regarding the use of renewable electricity. - We are conducting investment plans for alternative fuel and biomass fuel use. We continuously evaluate alternative raw material sources from various sectors to reduce our company's use of natural raw materials.
14.a.ii	**Current and projected direct mitigation and adaptation efforts**
	Carbon footprint data for Nuh Yapı Ürünleri and Nuh Beton was calculated for the first time in 2025. Neither of our companies has yet set an emissions target. However, Nuh Yapı Ürünleri is conducting R&D to develop eco-friendly products, in addition to evaluating processes that will reduce carbon emissions and selecting suppliers with low carbon emissions. At Nuh Çimento, the carbon footprint is significantly higher compared to the group's other companies. At Nuh Çimento, we share our direct mitigation and adaptation activities, as well as our strategic actions, under the heading Our Strategy and 2050 Net Zero Carbon Roadmap in this report.
14.a.iii	**Current and projected indirect mitigation and adaptation efforts**
	There are no reduction and adaptation studies carried out with customers or suppliers in the value chain at Nuh Çimento Group.

TSRS 2	
14.a.iv	**Transition plan**
	Our Strategy and 2050 Net Zero Carbon Roadmap At Nuh Çimento, our company's sustainability strategy began years ago as a result of rising global energy costs, which led us to need alternative energy and raw material sources. Sustainability projects are managed as part of our company's daily operations, and our goals are shaped within this framework. In recent years, we have felt the consequences of climate change intensely and evolving international regulations have influenced us to begin managing our strategy with a climate risk-focused approach. Following the Paris Climate Agreement, we have prepared our transition plan in alignment with the roadmap published by the European Cement Association (CEMBUREAU) and the decisions and actions adopted by the Climate Council. **At Nuh Çimento, after achieving certain reduction targets, we aim to become a Net Zero Carbon company by 2050 by capturing remaining emissions using carbon capture technologies. We have identified short-, medium-, and long-term goals as milestones on this journey.** • In line with the targets we set based on our 2017 emissions, we aim to achieve a 22% emission reduction in 2030 and a 35% reduction in 2050, • To increase our alternative fuel usage rate to 20% by 2030 and to provide 25% of this rate from biomass, • By 2050, we aim to increase our alternative fuel usage rate to 40% and provide 50% of this rate from biomass, • We aim to meet 40% of our electricity needs from renewable energy sources in 2030 (with investment capacities of 55 GW WPP, 25 GW HEPP, 150 GW WHR), and to increase this rate to 100% in 2050 and obtain it entirely from RES- SPP sources. We are planning a significant shift in our product portfolio, particularly in CEM I production. We aim to reduce our current CEM I production of 3.8 million tons to 1 million tons by 2030 and to completely cease CEM I production by 2050, transitioning to the low-carbon, environmentally friendly CEM II product line. Our five-step strategic actions to achieve these goals are as follows. **1- Producing Green Cement** • Developing and producing the same quantity and quality of cement by using less clinker, adopting new technologies and increasing the use of alternative raw materials **2- Realizing Green Raw Material Transformation** • Developing circular economy (reuse and recycling of waste) and industrial symbiosis (use of waste from one sector as raw material in another sector) **3- Realizing Green Fuel Conversion** • Use cheaper and lower-carbon fuels than primary fuels, such as RDF (Refuse-Derived Fuel), SRF (Solid Recovered Fuel), and ELT (End-of-Life Tires) • To conduct studies on biomass and energy agriculture and to increase the use of renewable energy sources **4- Producing and Using Green Electricity** • Increasing electricity production from renewable sources with our Waste Heat Recovery (WHR) Facility and Hydroelectric Power Plant (HES) • Reducing fossil fuel dependency through electrification projects **5- Realizing the Green Factory Transformation** • To be a factory that consumes less fuel and electricity per unit of product through continuous efficiency projects • Developing energy efficiency projects Nuh Beton and Nuh Yapı Ürünleri will be included in the Nuh Group Climate Transition Plan, along with the targets to be determined starting from 2025.

TSRS 2	
14.a.v	**Plan to achieve goals**
	Our company's achievement of climate-related targets, including greenhouse gas emission targets, will be ensured through the climate transition plan included in Article 14.a.iv.
14.b	**Available and planned resources to achieve goals**
	At Nuh Çimento, our 2025 expenditures, in line with current targets and emissions management, accounted for approximately 57% of our total environmental expenditures, totaling 61,7 million TL. We will leverage our strong equity structure for future investments to achieve our goals. Nuh Beton and Nuh Yapı Ürünleri do not have climate-related targets for 2025.
14.c	**Progress towards plans announced in the previous reporting period to achieve targets**
	The table of climate targets included in this report provides an explanation regarding targets that do not align with the 2025 target and the 2025 performance.

16.b	**Climate-related risks and opportunities that pose a significant risk that may require a significant adjustment to the carrying amounts of assets and liabilities reported in the relevant financial statements in the next financial reporting period**
	There are no climate-related risks and opportunities that pose a significant risk that would require a significant adjustment in the next financial reporting period.
16.c	**Expected changes in financial position in the short, medium and long term, considering the strategy for managing climate-related risks and opportunities**
16.c.i	**Investment and divestiture plans, including plans that are not contractually committed**
	Given our strategy to manage climate-related risks and opportunities, there are no investment or divestment plans in place.
16.c.ii	**Planned financing sources to implement the strategy**
	Given our strategy for managing climate-related risks and opportunities, we do not expect a significant change in our financial position in the short, medium and long term due to the risk we have identified. The company's strong cash flow provides significant flexibility in financing its strategic objectives. In this context, its primary financing sources are equity and existing cash reserves. This current cash flow structure allows it to maintain operational independence and minimize interest/expense risks. However, in order to maximize capital efficiency and respond more quickly to investment opportunities, it also evaluates external financing alternatives under favorable conditions.

TSRS 2	
16.d	**Expected changes in financial performance and cash flows in the short-, medium- and long-term, given the strategy for managing climate-related risks and opportunities**
	Given the company's strategy to manage climate-related risks and opportunities, the effect of these factors on financial performance is limited but increasingly measurable. The total effect of environmental compliance risks identified in the risk inventory constitutes a financial burden of approximately 2% of turnover. This burden stems from factors such as criminal sanctions, carbon taxes, and increases in production costs. Meanwhile, the introduction of low-carbon products within the opportunity inventory is projected to generate additional revenues of approximately 4% of revenue. While this suggests that sustainability-related risks are more prevalent in the short term, investments in the medium and long term have the potential to positively contribute to revenue and cash flow. In the coming years, as these opportunities are reflected more clearly in the financial statements and risks are managed more effectively, the company is expected to improve its profitability, cash flow and liquidity structure.
21.a	**Why quantitative information is not provided**
	A figure has not been given because the need for a specific financing source has not been identified.
21.b	**Qualitative information on financial effects**
	In the financial statements, net sales, cost of sales, general production expenses, property, plant and equipment, research and development expenses, interest expenses, and penalties are exposed to the direct and indirect effects of climate- related risks and opportunities. Regarding these risks, cost of sales and general production expenses may increase due to carbon taxes, energy supply disruptions, and additional costs related to water supply. Property, plant and equipment, on the other hand, are increasing due to investments in carbon reduction technologies and energy efficiency. While these investments increase depreciation expenses in the short term, they also provide cost-effectiveness in the long term. Interest expenses are at risk of increasing due to potential difficulties in accessing sustainable financing. Additionally, lawsuits and penalties resulting from environmental non-compliance can directly affect financial statements. From an opportunity perspective, net sales are positively affected by the introduction of low-carbon products and increased demand. Research and development expenses are increasing for new product and technology development, and these investments enhance product diversity and competitiveness in the medium to long term. Renewable energy investments provide cost advantages by reducing energy costs. Furthermore, access to low-interest loans based on broad sustainability (including climate change, mitigation, and adaptation) offers the potential to positively effect financing costs.
21.c	**Quantitative information on the combined financial effects of a climate-related risk or opportunity**
	Effective risk management and rapid opportunity assessment are critical to financial stability and sustainable growth. Considering the combined effect of climate-related risks and opportunities, our company's financial performance could be subject to significant changes, both in terms of cost increases and revenue and cost benefits. As of 2025, the negative climate-related effects and positive returns in the medium and long term will approximately balance each other. This demonstrates that our company has correctly positioned its climate strategy and is managing the transformation process without creating short-term financial pressures. Consequently, if these risks and opportunities were realized today, the combined financial effect of climate-related risks and opportunities could generate a net positive contribution of approximately 384 million TL. While this impact represents a limited share of the company's total revenue, it supports its financial stability and growth strategy in the medium and long term.

Strategy/Climate Resilience	
TSRS 2	
22.a	**Our assessment of climate resilience**
22.a.i	**Effects of climate resilience assessment on strategy and business model**
	We have a **2050 Net Zero Carbon Roadmap** to ensure climate resilience. These roadmap actions form the foundation of our strategy to address climate-related risks. These actions will enable our business model to transition to lower-emission production.
22.a.ii	**Key areas of uncertainty we considered in the assessment**
	The situation that is valid for the cement industry in general is that, due to the nature of the industry, methods such as efficiency, clinker reduction and the use of alternative raw materials do not result in significant reductions. Therefore, reductions will be possible through more advanced technologies such as carbon capture, etc. There are uncertainties regarding the development and availability of these technologies. In addition, there are uncertainties such as the completion of the establishment of an emissions trading system in our country, the determination of the carbon price and free allocation amount, and CBAM regulations.
22.a.iii	**The company's capacity to adapt or adjust its short, medium and long-term strategy and business model to climate change**
22.a.iii.1	**Availability and flexibility of existing financial resources**
	The existing financial resources at Nuh Çimento Group are sufficient to respond to the effects identified in the climate-related scenario analysis, including addressing climate-related risks and taking advantage of climate-related opportunities, and our company's cash and capital structure is strong. On the other hand, carbon capture facilities and how carbon will be reused are still unclear issues globally. Because our approach to these issues will align with the industry, we do not anticipate any risks or resilience that differ from the industry.
22.a.iii.2	**Capabilities for changes to existing assets**
	Our company has financial capabilities to redeploy, repurpose, upgrade or decommission existing assets.
22.a.iii.3	**Effect of current and planned investments in climate-related mitigation, adaptation and climate resilience opportunities**
	Our company's current plans are based on efficiency, optimization and R&D, and no significant financial resource planning has been made in this context. Actions beyond 2030 will require much larger investments and require significant financial resources. Nuh Çimento plans to proceed with a plan aligned with its monetary policies, focusing on green loans as a source of financing for investments.

TSRS 2	
22.b	**How and when to conduct climate-related scenario analysis**
22.b.i.1	**Climate-related scenarios used for analysis and their sources**
	In assessing physical and transition risks related to climate change, the IPCC's Shared Socioeconomic Pathways (SSP) Socioeconomic We examined the SSP2-4.5 and SSP5-8.5 scenarios in terms of temperature changes and water scarcity in the geography in which we operate. We assessed our physical climate risks in the SSP2-4.5 Scenario and reviewed our resilience to this risk by reviewing our water management strategies. We assessed the resilience of **our 2050 Net Zero Carbon Roadmap** by taking into account the projections of the SSP1-1.9 scenario, which we consider to be the most appropriate scenario to assess the transition risks of the cement industry among the IPCC's Common Socioeconomic Pathways scenarios, and which is compatible with our climate strategies. In our 2025 risk and opportunity analysis, we included in our assessment three additional climate scenarios which we previously examined as frequently adopted in the cement industry.
22.b.i.2	**Variety of scenarios used in the analysis**
	We considered four different IPCC scenarios and one EIA scenario.
22.b.i.3	**The relationship between the scenarios used in the analysis and physical and transition climate risks**
	The IPCC SSP1-1.9 scenario we chose is associated with climate-related physical risks. Since it describes a low-emission transition, low energy and resource intensity, and rapid technological transformation, it provides a transition context that also represents **transition risks and opportunities** in comprehensive risk analyses. The IPCC SSP2-4.5 scenario we chose is associated with climate-related physical risks. The IPCC RCP 4.5 scenario we chose is associated with climate-related physical risks. The IPCC RCP 8.5 scenario we chose is associated with climate-related physical risks. The IPCC EIA NZE2050 scenario we chose is associated with climate-related transition risks.
22.b.i.4	**Compliance of the scenarios used in the analysis with the latest international agreement on climate change**
	The IPCC SSP1-1.9 scenario we chose is fully compliant with the Paris Climate Agreement. The IPCC SSP2-4.5 scenario we chose is not compliant with the Paris Climate Agreement. The IPCC RCP 4.5 scenario we chose is partially compliant with the Paris Climate Agreement. The IPCC RCP 8.5 scenario we chose is not compliant with the Paris Climate Agreement. The EIA NZE2050 scenario we chose is fully compliant with the Paris Climate Agreement.
22.b.i.5	**Reason for deciding on the selected scenarios**
	SSP1-1.9 is generally considered the most appropriate scenario for assessing transition risks for the cement industry. There are several key reasons for this, detailed below. **Environmental Targets:** This scenario envisions significant reductions in greenhouse gas emissions and pushes industries, including cement, to use cleaner technologies and alternative materials. **Policy and Regulatory Factors:** Under SSP1-1.9, strong climate policies and regulations that promote low-carbon technologies and sustainable practices are expected. **Technological Innovation:** The scenario envisions a rapid transition to sustainable technologies, including innovations in cement production such as carbon capture and storage (CCS), alternative binders, and improved energy efficiency. Understanding the pace and type of technological advancements under such a scenario is crucial for the cement industry to mitigate transition risks.

	Market Expectations: SSP1-1.9 reflects a future where sustainability becomes a key market driver as investors increasingly consider climate risks in their decision-making processes. **Reputation and Social Licence:** Stakeholder expectations are shifting toward sustainability, affecting the social license to operate. SSP1-1.9 outlines a future where public awareness and activism about climate change are leading to a decline in tolerance for high-emission practices and forcing the cement industry to align more closely with sustainability criteria. **Consequently,** transition risks under the SSP1-1.9 scenario are particularly serious for the cement sector, as this scenario addresses the need for radical and rapid changes in the production and use of cement and highlights the importance of understanding the effects of climate policies, market dynamics and technological developments. In addition, this scenario is directly linked to the **Transition to Lower Emission Technologies and Digitalization** risks, which we classify as very high risk and very high opportunity in Nuh Group's risk assessments, as well as to our other transition risks, which we define as having a medium level effect. This scenario has guided our analyses of transition risks and provided an opportunity to confirm that our transition plan, which we have named the **2050 Net Zero Carbon Roadmap**, will contribute to the company's resilience at the highest level. The climate transition plan prepared by Nuh Çimento includes initiatives, targets, and investments that address all sub-categories of these risks, mitigate them, and enable rapid adaptation to opportunities. **IPCC RCP 4.5, IPCC RCP 8.5, and IEA NZE2050** The three scenarios we have added to our evaluation this year, and which companies operating in Türkiye's cement sector have been using extensively in their assessments for 2024, outline very different climate and policy futures. For a company exporting cement from Türkiye to the U.S. and the EU, these scenarios essentially mean different levels of carbon costs, shifts in demand, and technological pressures. The most significant impacts on the cement sector relate to carbon pricing (including the EU's CBAM), demand for low-carbon products, and the pace and scale of capital expenditures for decarbonization (clinker reduction, alternative fuels, CCUS). A detailed examination of short-, medium-, and long-term financial effects has been submitted to the audit authority, and our report includes a summary of this information.
22.b.i.6	**Time periods used in the analysis**
	2017-2030-2050 These timeframes are described in our climate transition plan.
22.b.i.7	**Scope of operations used in the analysis**
	Nuh Çimento Group for physical risk scenario: 100% Nuh Çimento Group for the transition risks scenario: 100%

2025 Scenario Analysis Additional Notes

General Description of the Scenario	Potential Risks Under the Scenario
IPCC RCP4.5 A stabilization pathway in which radiative forcing is limited to approximately 4.5 W/m² by 2100. This pathway requires global mitigation policies and emissions to peak by mid-century and then decline. This implies moderate warming (typically around 2–3 °C by 2100 in most models), significant but more "manageable" physical climate impacts, and the widespread adoption of carbon pricing and low-carbon technologies.	Climate-Related Transition Risk 1 – Carbon Pricing and Regulation Climate-Related Transition Risk 2 – Technology and Product Obsolescence Transition Opportunity – Leadership in Low-Carbon Cement
What It Means for the Cement Industry	**Analysis of Risks from the Perspective of the Nuh Çimento Group**
RCP4.5 – A "Smooth" Yet Challenging Transition Cement production continues at a significant level, but there is strong pressure to reduce the clinker-to-cement ratio, increase the use of alternative fuels, and lower specific CO_2 emissions through carbon capture and storage (CCS) and carbon capture and utilization (CCU) cycles. Policy tools such as the ETS, CBAM, and supply standards are becoming increasingly stringent; efficient, low-carbon facilities in countries like Türkiye can maintain their competitive edge in EU/US markets if they complete their decarbonization processes in a timely manner.	This analysis found that the first transition risk defined for RCP 4.5 would have a high financial effect on Nuh Çimento and a medium financial effect on Nuh Yapı Ürünleri. It was also determined that the second transition risk would have a very high financial effect on Nuh Çimento. This risk did not apply to the other group companies. It was determined that the transition opportunity would have a very high financial effect on Nuh Çimento and a medium financial effect on Nuh Beton.

General Description of the Scenario	Potential Risks Under the Scenario
IPCC RCP8.5 A high-emission pathway with a radiative forcing of approximately 8.5 W/m² by 2100. It was developed as a "worst-case/high-end" scenario involving very high fossil fuel use initially and CO_2 concentrations likely exceeding 1,000 ppm. This scenario implies strong physical impacts (heat, sea-level rise, extreme weather conditions), a high risk of abrupt policy shifts, and significant macroeconomic disruption in many regions.	Climate-Related Physical Risk 1 – Physical Vulnerability and Social Impact Climate-Related Physical Risk 2 – Asset and Logistics Disruption Climate-Related Transition Risk 3 – "Late and Sudden" Policy Transition Opportunity – Demand for Resilient Infrastructure
What It Means for the Cement Industry	**Analysis of Risks from the Perspective of the Nuh Çimento Group**
RCP8.5 – Weak Mitigation Measures, Severe Physical Impacts Transition pressures are initially weaker, but physical risks (such as heat waves, water scarcity, supply disruptions, and damage to infrastructure, including concrete durability and carbonation behavior) increase. As impacts worsen, late and abrupt policy tightening may become necessary; this creates a risk of a "disorderly transition" for high-emission power plants and a risk of stranded assets.	The RCP 8.5 scenario entails greater physical risks compared to the other two scenarios. The Nuh Çimento Group analyzed physical risks under the general term "extreme weather events" and assessed that they would result in a high financial effect for Nuh Çimento and a medium effect for Nuh Yapı Ürünleri.

General Description of the Scenario	Potential Risks Under the Scenario
IEA Net Zero Emissions by 2050 (NZE2050) The 1.5 °C-compatible transition scenario includes over 400 milestones and aims for net-zero CO_2 by 2050 through rapid declines in fossil fuel use, large-scale energy efficiency improvements, and a transition to clean energy. This implies very stringent climate policies, rapidly rising carbon prices, rapid technological changes across all energy-intensive sectors, including cement, and strong investor and market expectations regarding adaptation.	Climate-Related Transition Risk 1 – Failure to Align with Net-Zero Expectations Climate-Related Transition Risk 2 – Deep Decarbonization Capital Expenditures (Alternative Fuels, CCUS, Portfolio Shift) Climate-Related Transition Risk 3 – Shift in Demand Toward Lower-Volume Materials Transition Opportunity – NZE-Aligned Low-Carbon Portfolio and CBAM Advantage
What It Means for the Cement Industry	**Analysis of Risks from the Perspective of the Nuh Çimento Group**
IEA NZE2050 – Rapid Decarbonization of Cement Significant reductions in emissions from the cement production process and fuel use will require the adoption of low-clinker cements, alternative binders, widespread use of alternative fuels, large-scale carbon capture, storage, and utilization (CCUS), and increased use of construction and demolition materials. Leading players in the sector are already referencing net-zero emissions (NZE) roadmaps in their SBTi-aligned targets and scenario analyses; this signals that investors expect robust net-zero emissions roadmaps for the cement sector.	Since the NZE205 Scenario aligns with Nuh Çimento's 2050 Net Zero Emissions target, the risks examined under this scenario do not pose a significant concern for the group. The Nuh Çimento Group views capital expenditures aimed at decarbonization as a necessary trade-off to mitigate future risks. Under this scenario, Nuh Çimento Group has analyzed the third transition risk as "changes in customer preferences" and identified a medium financial effect from Nuh Nuh Çimento perspective. The transition opportunity defined for NZE2025 is similar to that of RCP 4.5

TSRS 2	
22.b.ii	**Key assumptions used in the analysis**
22.b.ii.1	**Climate policies in countries of operation**
	Nuh Çimento Group carries out all its production activities in Türkiye. **Türkiye's Climate Policy General Framework** Türkiye's National Vision was defined as follows in the "National Climate Change Strategy Document", which was approved by the High Planning Council and entered into force on May 3, 2010: "Türkiye's national vision regarding climate change is to be a country that has integrated climate change policies with development policies; has expanded energy efficiency and increased the use of clean and renewable energy sources; actively participates in the fight against climate change within its specific conditions; and is able to offer a high quality of life and prosperity to all its citizens with a low carbon density." With this vision, Türkiye is developing policies in areas such as agriculture, water resources and urban planning as part of its climate change adaptation strategies. **The Paris Agreement and the Net Zero Target** • On October 7, 2021, Türkiye ratified the Paris Agreement, which entered into force on November 4, 2016, and aims to limit global temperature rise to 1.5 degrees Celsius compared to pre-industrial levels. It subsequently set a "net zero emissions" target for 2053. This target aims to reduce greenhouse gas emissions and create a carbon-neutral economy. **Nationally Determined Contribution (NDC)** • Türkiye submitted an updated Nationally Determined Contribution (NDC) in 2023. According to this declaration, Türkiye aims to reduce its greenhouse gas emissions by 41% by 2030, compared to the baseline scenario outlined in 2012. It pledges to "reduce from increasing" greenhouse gas emissions by 2020. **Climate Law** • Türkiye's first Climate Law was submitted to the Turkish Grand National Assembly (TBMM) on February 25, 2025, during the period in which we prepared our report. Four articles of the law were passed, and subsequently, according to statements made to the press, the climate law proposal was withdrawn in April 2025 following public outcry and backlash from members of parliament. • The Climate Law entered into force in early July 2025. The new legal framework will not only reduce environmental effects but also usher in a completely new era of transformation for the economy, industry, and local governments. Mechanisms such as the Emissions Trading System (ETS) and carbon pricing are being introduced into legislation for the first time. Special financing resources are being established for green transformation projects. • Measuring, reporting, and managing emissions are now becoming a liability for companies. Access to green financing will only be available for low-carbon investments, and carbon costs will directly impact competitiveness. Companies that fail to comply will face penalties.

TSRS 2	
22.b.ii.2	**Macroeconomic trends**
	The year 2025 was a year in which significant opportunities in production and exports emerged for Türkiye's cement sector, while efforts to strike a balance between domestic demand and foreign markets continued. Although growth momentum in the domestic market remained limited, export performance remained strong, particularly for clinker products, and new market opportunities gained importance in the sector. **Slowing Growth and Signs of Recovery in the Domestic Market** In 2025, the sector's cement production reached 68.2 million tons in the first nine months of the year, marking a 7.4% increase compared to the same period the previous year. During the same period, domestic sales also rose by 6.3% to 56.2 million tons, indicating that demand in the local market continues to grow. **Strong Clinker Performance and New Markets in Exports** In the first nine months of 2025, the total cement exports of members of the Turkish Cement Manufacturers' Association (TÜRKÇİMENTO) increased by 13.7% compared to 2024, reaching 11,546,203 tons. The sector's performance in the domestic market showed regional variations. While limited declines in domestic sales were observed in regions such as Marmara and Ege, the overall domestic market volume maintained its growth. **Investments in Sustainability and Energy Efficiency** The cement industry is facing global and national regulatory pressures to reduce carbon emissions. In Türkiye, investments in waste heat recovery, the use of alternative fuels, and energy efficiency have gained momentum. Industry players are continuing their efforts to develop cement products with added benefits, in addition to expanding sustainability-focused production processes. **Digitalization and Modernization** In 2025, investments in digitalization and automation in cement production increased. Managing production processes using digital twin technologies and AI-driven optimization is boosting efficiency and reducing costs. Modernization projects are bolstering the sector's competitiveness. **Economic and Geopolitical Uncertainties** The slowdown in the global economy, high inflation, and geopolitical risks (U.S.-China trade tensions, fluctuations in energy prices) are making the export and investment environment more challenging. The OECD expects Türkiye's economy to grow by approximately 2.6%–3.1% in 2025, which could limit the sector's growth rate.

TSRS 2	
22.b.ii.3	**Variables at the national or regional level**
	World Economic Forum (WEF) Risk Perception The WEF's Global Risk Perception Report 2026 identifies geo-economic conflict, misinformation and disinformation, social polarization, and extreme weather events caused by climate change as the risks that will be most prominent in the short term. In the long term, extreme weather events rise to the top of the list, followed by loss of biodiversity and ecosystem collapse. Findings from the Global Risk Perception Survey indicate that, in the short term, environmental risks have lost relative and absolute importance compared to previous years; however, in the long term, environmental risks (particularly extreme weather events) continue to hold a dominant position among the highest-impact risks. The risks assessed in the GRC Management Türkiye Risk Report 2026 based on likelihood of occurrence and ranked among the top five in Türkiye's five-year projection are: fake news in the media, deepening inequality, interference with freedom of expression, economic conflicts between nations, and deep or widespread poverty. **Climate Change** 2025 was a year in which we felt the devastating effects of climate change more acutely across the globe. Meanwhile, 2024 went down in history as the hottest year on record to date. The fight against climate change and adaptation to its impacts are increasingly taking center stage in risk reports, global goals, multinational agreements, and regional accords. According to the WEF report, extreme weather events caused by climate change are the fourth-largest short-term risk globally, while they rank first among long-term risks. **EU Green Deal Carbon Border Adjustment Mechanism** The EU Carbon Border Adjustment Mechanism Regulation, which officially entered into force on May 16, 2023, establishes a transition period from October 1, 2023, to December 31, 2025. Covering producers exporting cement, iron and steel, hydrogen, fertilizers, aluminum, and electricity to the EU, the regulation imposes a reporting requirement on exporters during this period solely regarding the carbon content of their products. Starting in 2026, companies that fail to reduce their emissions may experience a decline in sales revenue to the EU due to the high emissions of the products they export and the preference of customers who wish to avoid taxes for lower-emission products. The impact of this risk may be mitigated through the National Climate Act, the ongoing preparations for the establishment of an Emissions Trading System (ETS), and the conclusion of agreements with the EU. According to the World Bank's CBAM Exposure Index 2025,, the carbon intensity of products exported by Türkiye under the CBAM framework is relatively low. However, since Türkiye has high export volumes in various sectors such as iron and steel, aluminum, and fertilizers, it is expected to be significantly affected by any carbon fees that may be imposed. Finally, considering Türkiye's geographical advantage, it appears to be in a favorable position regarding logistics-related emissions.
22.b.ii.4	**Energy use and diversity**
	Energy Diversity in Türkiye According to data from the Ministry of Energy and Natural Resources of the Republic of Türkiye, Türkiye's installed electricity capacity rose to 122,519 MW as of the end of December. Of the 362,992 GWh of electricity generated, the highest level on an annual basis, 32.6% came from wind and solar energy. In 2024, 34.7% of Türkiye's electricity production came from coal, 18.9% from natural gas, 21.1% from hydropower, 10.4% from wind, 8.7% from solar, 3.1% from geothermal energy, and 3.1% from other sources. As of the end of December 2025, the distribution of Türkiye's installed capacity by source is as follows: 26.4% from hydroelectric power, 19.6% from natural gas, 18% coal, 12.1% from wind, 20.5% from solar, 1.4% from geothermal, and 2.1% from other sources.

TSRS 2	
22.b.ii.5	**Developments in technology**
	In 2025, sustainability, digitalization, recycling, and the circular economy are emerging as key priorities in the cement and concrete sector. Innovations such as technologies aimed at reducing carbon emissions, artificial intelligence and sensor-based monitoring systems, advanced material development, and 3D printing are transforming the sector. Additionally, energy efficiency and waste management practices are contributing to the reduction of environmental impacts. **1. Carbon Emission Reduction and Sustainable Production Technologies** • **Carbon Capture and Storage (CCS) Technologies:** CCS projects are entering the commercialization phase; pilot facilities are being commissioned or planned, particularly in Europe. • **Use of Alternative Raw Materials and Fuels:** The production of blended cement using fly ash, slag, and calcined clay, along with the use of alternative fuels, remained among the industry's priorities in 2025 to reduce natural resource consumption and lower the carbon footprint. • **Low Carbon Cement Products:** New-generation blended cement and low-carbon concrete products can reduce the carbon footprint by up to 30%. In Türkiye as well, calcined clay (LC3) and low-carbon cements were among the main agenda items for the cement sector in 2025. This technology was discussed as central to the sector's net-zero goals. **2. Digitalization, Artificial Intelligence, and Data Analytics** • **Digital Twins and Sensor Technologies:** By using digital twin technology and IoT sensors in concrete pouring, the curing process and durability can be monitored in real time, and production processes are optimized. • **AI-Driven Optimization:** AI algorithms are used to improve efficiency in energy consumption, raw material usage, and maintenance processes. • **Smart Concrete and Structural Health Monitoring:** By embedding sensors in concrete to monitor temperature, humidity, and detect cracks, the lifespan and safety of structures are enhanced. **3. Advanced Materials Technologies** • **Self-Healing Concrete:** Microorganisms or chemical capsules enable concrete cracks to heal themselves, thereby reducing maintenance costs while increasing durability. • **Nanotechnology:** Nanosilicates and nanotubes fill the pores in concrete, enhancing durability and waterproofing. • **Lightweight and High-Performance Concrete:** Fiber-reinforced and high-strength concrete enables structures to be both lighter and more durable. **4. Advanced Manufacturing Techniques** • **3D Printing Technologies:** 3D printing applications in the cement and concrete industry are rapidly evolving, enabling the faster and more cost-effective construction of complex and customized structures. • **Automation and Robotics:** The use of robotic systems and automation in concrete pouring and surface finishing is on the rise, which improves quality while increasing labor productivity. **5. Energy Efficiency and Waste Management** • **Waste Heat Recovery:** Waste heat recovery systems in cement plants improve energy efficiency and reduce environmental impacts. • **Recycling and Waste Management:** The use of industrial waste as an alternative raw material and recycling technologies are critical for sustainable production. Significant progress has been made in cement and concrete recycling technologies. New techniques, such as electrochemical separation, enable recovery by separating cement mortars into aggregate and binder components.
22.b.iii	**The era of climate-related scenario analysis**
	The scenario assessment of climate-related transition risks was first conducted in the second quarter of 2025 and was further detailed in our 2025 report. It is planned to be reviewed and evaluated in each subsequent reporting period. The analysis is location-based and was conducted for Nuh Çimento, Nuh Beton, and Nuh Yapı, which carry out production activities within the Group.

METRICS and TARGETS

Sustainability-Related Metrics and Targets

TSRS 1 Metrics

TSRS 1	Disclosures for Metrics	
46	**Descriptions for each sustainability-related risk and opportunity that is reasonably expected to affect the future financial viability of the company:**	**Decrease in Water Quality and Water Resources**
46.a	**The metrics required by the relevant TSRS for each sustainability-related risk and opportunity that is reasonably expected to affect the company's future financial viability (Quantitative)**	There is no TSRS- mandated metric on this topic.
46.b	**Metrics the company uses to measure and monitor**	**Decrease in Water Quality and Water Resources**
46.b.i	**Metrics we use to measure and monitor sustainability risks or opportunities (Quantitative)**	Water Usage Amount (tons/year)
46.b.ii	**Description of the metrics we use to measure and monitor performance regarding progress against targets and sustainability-related risk or opportunity (Quantitative/qualitative)**	Our goal is to reduce our annual water usage.
47	*If there are no TSRS applicable to a sustainability-related risk or opportunity, an entity shall apply paragraphs 57– 58 to determine the applicable metrics.*	**Decrease in Water Quality and Water Resources**
57.a	**Suitable for decision-making by users of general- purpose financial reports,**	Annual water usage is the most frequently used water-related metric in the industry.
57.b	**Judgement to identify information that faithfully represents sustainability-related risk and opportunity**	
58	*In making the judgment set out in paragraph 57, the entity;*	**Decrease in Water Quality and Water Resources**
58.a	References metrics related to Description topics in SASB Standards and evaluates the applicability of those metrics. An entity may conclude that the metrics specified in SASB Standards are not applicable in the entity's circumstances.	We evaluated the applicability of metrics related to Description topics in SASB Standards and addressed those related to risks and opportunities.

58.b	*For TSRSs, the following sources may be cited and their applicability assessed – unless contradictory:*	**Decrease in Water Quality and Water Resources**
58.b.i	**CDSB Framework Implementation Guide**	Not used.
58.b.ii	**The latest regulations from other standard-setting organizations that impose obligations to meet the needs of general-purpose financial reporting users**	Not used.
58.b.iii	**Information - including text - disclosed by businesses operating in the same sector or geography**	Benchmarking was done and sectoral metrics were used.
58.c	*It may refer to and evaluate the applicability of sources specified in Annex C to the extent that they contribute to the achievement of the purpose of this Standard (see paragraphs 1-4) and as long as they do not conflict with TSRSs.*	The Annual Water Usage metric is also available in the GRI Global Reporting Initiative Standards.
48	*Paragraphs 45-46 include metrics associated with particular business models, activities, or other common characteristics that characterize participation. (Quantitative)*	-
49	*If a business discloses a metric from a source other than TSRSs, the business identifies the source and the metric from which it is sourced.*	**Decrease in Water Quality and Water Resources**
50	*Metrics determined by the business itself*	
50.a	**How the metric is defined, including whether the metric is derived from a metric adopted from a source other than the TSRSs and, if so, from what source and how the metric as described by the entity differs from the metric stated in that source (Qualitative)**	The metric is taken from the SASB Standard recommended by TSRS.
50.b	**A statement of whether the metric is an absolute measure, a measure expressed in relation to another metric, or a qualitative measure (Qualitative)**	Metric is an absolute measurement.
50.c	**Whether the metric has been validated by a third party and, if so, which party performed the validation (Qualitative)**	Metric is 3rd Party verified: CTR Sertifikasyon ve Eğitim Ltd. Şti.
50.d	**The method and calculation inputs we used to calculate the metric, including limitations of the method used and key assumptions made (quantitative and qualitative)**	See: Water Footprint Verification Reports

SASB - Construction Materials Sectoral Metrics											
Subject	**Metric**	**Category**	**UoM**	**Group Consolidated**		**Nuh Çimento**		**Nuh Beton**		**Nuh Yapı Ürünleri**	
				2024	**2025**	**2024**	**2025**	**2024**	**2025**	**2024**	**2025**
Decrease in Water Quality and Water Resources	Total water withdrawn *(Source: Surface, underground, sea, purchased drinking water*	Quant.	Thousand cub. met. (m^3)	2,464*	2,949	1,841	2,322**	343	314	280	313
	Total water consumed	Quant.	Thousand cub. met. (m^3)	2,350	2,863	1,757	2,263	337	302	256	298
	Rate of water withdrawal in areas with High or Extremely High Baseline Water Stress***	Quant.	Perc. (%)	0%	1%	0%	0%	0%	13.12%	0%	0%
	The rate of water consumed in areas with High or Extremely High Baseline Water Stress	Quant.	Perc. (%)	0%	1%	0%	0%	0%	12.69%	0%	0%

**The Group Consolidated data originally listed as 2,264 in the total water withdrawal metric for 2024, has been updated due to a typographical error.*
*** The total water withdrawal data provided here differs from the total water withdrawal volume reported in the EFR due to the SASB KPI definition. This discrepancy is because reclaimed water is not included in the TSRS data under the SASB KPI definition. In 2025, the volume of water reclaimed from treatment plants was 179,279 m^3.*
**** According to Aquaduct data, water stress is at a medium-high level in Kocaeli province, where the majority of our facilities are located.*

Water Resources Withdrawn		
Nuh Çimento	**Nuh Beton**	**Nuh Yapı Ürünleri**
Surface Water (Ulupınar) Well Water Sea Water Purchased Drinking Water	Mains Water Transport Water Well Water Sea Water (from Nuh Çimento) Purchased Drinking Water	Sea Water (from Nuh Çimento) Purchased Drinking Water

TSRS 1 Targets

TSRS 1	Sustainability Targets	Nuh Çimento	Nuh Beton	Nuh Yapı Ürünleri
51.b	**Target Name/Description (Quantitative or qualitative)**	Keeping the annual water usage below 2,700,000 m^3	Keep the water ratio used in concrete production below 175 kg per m^3	Remain below 5% of 2025 consumption
51.a	**Metric**	Annual amount of water consumed (m^3)	Annual amount of water consumed (m^3)	Annual amount of water consumed (m^3)
51.d	**Base Period**	2025-2,500,804 m^3	2025-175 kg	2025 - 298,000 m^3
51.c	**Valid Period**	2026	2026	2026
51.e	**Milestones**	Not available.	Not available.	-
51.e	**Interim Targets**	2024	-	-
51.f	**Analysis**	In 2025, usage exceeded the maximum target volume of 2.1 million m^3. (2,500,804 m^3) Factors contributing to exceeding the specified target included the new 12 MW WHR turbine investment, the bilge boiler, the activation of road sprinkler lines during the summer months to ensure dust suppression, and the increased intake of seawater to obtain process water due to rising seawater conductivity levels. In light of these new conditions, 2025 has been designated as the new base year. Of the water consumption recorded in 2025, 179,279 cubic meters were supplied from wastewater.	-	-
51.g	**Revisions**	We have not made any revisions to the target.	The target was set in 2025 and has not been revised.	The target was set in 2025 and has not been revised.

Climate Change Related Metrics and Targets

TSRS 2 Metrics

Greenhouse Gas Emissions (Consolidated) in accordance with the GHG Protocol Corporate Accounting and Reporting Standard
(The results are consistent with those calculated according to the TS EN ISO 14064-1 Standard.)

Absolute Gross Greenhouse Gas Emissions		Unit	2024	2025
TSRS 2				
29.a.i.1	**Scope 1 Greenhouse Gas Emissions (TOTAL)**	**metric tons of CO2e**	**3,865,292**	**4,122,530.28**
	Nuh Çimento	metric tons of CO2e	3,584,953	3,925,663.83
	Nuh Beton	metric tons of CO2e	43,335	16,915.92
	Nuh Yapı Ürünleri	metric tons of CO2e	237,004	179,950.53
29.a.i.2	**Scope 2 Greenhouse Gas Emissions (TOTAL)**	**metric tons of CO2e**	**182,024**	**188,432.26**
	Nuh Çimento	metric tons of CO2e	169,456	175,864.63
	Nuh Beton	metric tons of CO2e	2,325	1,783.29
	Nuh Yapı Ürünleri	metric tons of CO2e	10,243	10,784.34
29.a.i.3	**Scope 3 Greenhouse Gas Emissions (TOTAL)**	**metric tons of CO2e**	**1,544,097**	**1,290,101.49**
	Nuh Çimento	metric tons of CO2e	834,217	633,153.65
	Nuh Beton	metric tons of CO2e	641,237	591,414.58
	Nuh Yapı Ürünleri	metric tons of CO2e	68,643	65,533.26
	Scope 1+2+3 Consolidated Group	**metric tons of CO2e**	**5,591,413**	**5.601.064.04**

Absolute Gross Greenhouse Gas Emissions							
Explanations of Scopes	**Unit**	**Nuh Çimento**		**Nuh Beton**		**Nuh Yapı Ürünleri**	
		2024	**2025**	**2024**	**2025**	**2024**	**2025**
Direct Emissions	t CO_2e	3,584,953.46	3,925,663.83	43,335.18	16,915.92	237,003.60	179,950.53
Significant Indirect Emissions	t CO_2e	1,003,673.16	809,018.28	643,561.82	593,197.87	78,886.46	76,317.60
• Energy Indirect Emissions (Scope 2)	t CO_2e	169,456.46	175,864.63	2,325.18	1,783.29	10,243.03	10,784.34
• Emissions from Transportation	t CO_2e	467,133.71	164,201.80	29,101.35	43,489.77	7,498.83	15,612.62
• Emissions from Products Used	t CO_2e	282,343.60	462,424.30	610,055.91	542,887.61	60,913.16	29,574.12
• Emissions from the Use of Manufactured Products	t CO_2e	84,739.39	6,527.55	2,079.39	5,037.20	231.44	20,345.65
• Other Emissions	t CO_2e	-		-	-	-	0.87
Emissions from Biomass	t CO_2e	-		-	-	-	-
Greenhouse Gas Removals	t CO_2e	-		-	-	-	-
Greenhouse Gas Reduction Initiative	t CO_2e	54,062.08	60,936.52	-	-	-	-

Scope Emissions According to the GHG Protocol Corporate Accounting and Reporting Standard

Absolute Gross Greenhouse Gas Emissions					
Explanations of Scopes	**Unit**	**Nuh Çimento**		**Nuh Beton**	
		2024	**2025**	**2024**	**2025**
Scope 1: Direct Emissions	t CO_2e	3,584,953.46	3,925,663.83	43,335.18	16,915.92
Scope 2: Energy Indirect Emissions	t CO_2e	169,456.46	175,864.63	2,325.18	1,783.29
Scope 3: Other Indirect Emissions	**t CO_2e**	**834,216.71**	**633,153.65**	**641,236.64**	**591,414.58**
• Category 1 - Purchased goods and services	t CO_2e	40,016.62	172,619	588,622.49	524,100.50
• Category 2 - Capital goods	t CO_2e	662.59	1,732.92	0.00	3,066.98
• Category 3 - Fuel and energy related activities	t CO_2e	241,533.66	287,823.46	21,225.85	14,298.24
• Category 4 - Upstream transportation and distribution	t CO_2e	37,678.07	35,711.57	27,457.36	37,058.61
• Category 5 - Waste generated in operations	t CO_2e	130.73	248.92	207.57	1,421.89
• Category 6 - Business travel	t CO_2e	228.74	60.78	0.00	0.00
• Category 7 - Commuting	t CO_2e	78.10	267.77	0.00	361.87
• Category 8 - Upstream leased assets	t CO_2e	0,00	0.00	0.00	0.00
• Category 9 - Downstream transportation and distribution	t CO_2e	429,148.81	128,161.69	1,643.99	6,069.29
• Category 10 - Processing of products sold	t CO_2e	36,498.29	0.00	0.00	0.00
• Category 11 - Use of products sold	t CO_2e	0.00	0.00	0.00	0.00
• Category 12 - End-of-life treatment of sold products	t CO_2e	48,241.10	6,527.55	1,962.71	4,960.32
• Category 13 - Downstream leased assets	t CO_2e	0.00	0.00	116.68	0.00
• Category 14 - Franchises	t CO_2e	0.00	0.00	0.00	0.00
• Category 15 - Investments	t CO_2e	0.00	0.00	0.00	76.87
Scope 1+2+3 Total	**t CO2e**	**4,588,626**	**4,734,682.11**	**686,897**	**610,113.79**

Absolute Gross Greenhouse Gas Emissions					
Explanations of Scopes	**Unit**	**Nuh Yapı Ürünleri**		**Consolidated Group**	
		2024	**2025**	**2024**	**2025**
Scope 1: Direct Emissions	t CO_2e	237,003.60	179,950.53	3,865,292.24	4,122,530.28
Scope 2: Energy Indirect Emissions	t CO_2e	10,243.03	10,784.34	182,024.67	188,432.26
Scope 3: Other Indirect Emissions	**t CO_2e**	**68,643.45**	**65,533.26**	**1,544,096.80**	**1,290,101.49**
• Category 1 - Purchased goods and services	t CO_2e	45,930.55	16,701.77	674,569.66	713,421.26
• Category 2 - Capital goods	t CO_2e	0.00	71.61	662.59	4,871.51
• Category 3 - Fuel and energy related activities	t CO_2e	14,982.62	12,752.86	277,742.13	314,874.56
• Category 4 - Upstream transportation and distribution	t CO_2e	1,208.21	3,817.28	66,343.64	76,587.46
• Category 5 - Waste generated in operations	t CO_2e	0.00	47.88	338.30	1,718.70
• Category 6 - Business travel	t CO_2e	0.00	14.38	228.74	75.16
• Category 7 - Commuting	t CO_2e	85.72	1,487.30	163.82	2,116.93
• Category 8 - Upstream leased assets	t CO_2e	0.00	0.00	0.00	0.00
• Category 9 - Downstream transportation and distribution	t CO_2e	6,204.91	10,294.53	436,997.71	144,525.51
• Category 10 - Processing of products sold	t CO_2e	0.00	0.00	36,498.29	0.00
• Category 11 - Use of products sold	t CO_2e	0.00	0.00	0.00	0.00
• Category 12 - End-of-life treatment of sold products	t CO_2e	231.44	20,308.44	50,435.25	31,796.31
• Category 13 - Downstream leased assets	t CO_2e	0.00	8.97	116.68	8.97
• Category 14 - Franchises	t CO_2e	0.00	0.00	0.00	0.00
• Category 15 - Investments	t CO_2e	0.00	28.24	0.00	105.12
Scope 1+2+3 Total	**t CO2e**	**315,890.08**	**256,268.13**	**5,591,413.71**	**5,601,064.04**

TSRS 2	

29.a.iii.1	Measurement approach, inputs, and assumptions used to measure greenhouse gas emissions
	The greenhouse gas emission calculation was calculated using a financial control approach, including all activities of Nuh Çimento, Nuh Beton, and Nuh Yapı Ürünleri. The greenhouse gas emission calculation results for the relevant period for Nuh Çimento Sanayi A.Ş.'s subsidiary Çim-Nak Taşımacılık Ltd. Şti. are shown within the Nuh Çimento data. This method was chosen to ensure consistency and comparability in the greenhouse gas inventory. Scope 1 greenhouse gas emissions data for Nuh Çimento and Nuh Yapı Ürünleri facilities are calculated using the calculation-based method under the Regulation on Monitoring Greenhouse Gas Emissions (MRV). Scope 1 emissions at Nuh Beton facilities are not covered by MRV; calculations are made voluntarily. Within the scope of the Calculation-Based method, analyses are conducted based on materiality values or the National Greenhouse Gas Inventory is used to calculate emissions from fuels used and processes. Continuous measurement and stock change methods are used for operational data. The Non-Automatic Weighing Instruments Regulation, calibration documents, and instrument uncertainties are used for weighbridges to calculate uncertainty. In the Scope 2 calculations for Nuh Çimento, Nuh Yapı Ürünleri, and Nuh Beton facilities located in the Hereke location, emissions from purchased electricity are calculated using the electricity generation and consumption point emission factors published by the Ministry of Energy and Natural Resources. Invoices were used as operational data. When calculating Scope 3 at Nuh Çimento, Nuh Yapı Ürünleri, and Nuh Beton facilities, a life cycle assessment approach was used, primarily based on operational data (purchase quantities, consumption quantities, etc.). When using emission factors, values from DEFRA, followed by EPA, Ecoinvent, and the national inventory were used with high priority. **When calculating Scope 3 Indirect Greenhouse Gas Emissions;** **1- Purchased goods and services** Ammonia, purchased additive chemicals, consumables and other chemicals, mineral oils, purchased packaging and transportation materials, extraction of raw materials (service purchases) (Method: GHG Protocol – DEFRA Water Supply D18, EPA, ECOINVENT V3.12) **2- Capital goods** Goods received for the purpose of providing services (investments, construction projects, real estate, purchases of construction equipment) (Method: GHG Protocol - EPA) **3- Fuel and energy** Based Products: Data on petcoke, coal, diesel, gasoline, natural gas, electricity (WTT), and electricity losses and thefts were collected. In addition, emissions from the transportation of purchased goods, business travel, and commuting were calculated. (Method: GHG Protocol - DEFRA, National Inventory) **4- Upstream transportation and distribution** 1.Kategoride satın alınan malların nakliyesi kaynaklı emisyonlar Based Products: Limestone, marl, clay, iron ore, iron silicate, gypsum, bauxite, trass, slag, cement additives, refractories, gypsum, packaging, ball bearings, oil, ammonia (Method: GHG Protocol - DEFRA) **5- Waste generated in operations** All Wastes (Hazardous + Non-Hazardous) (Method: GHG Protocol - DEFRA) **6- Business travel** All air, bus, train, and taxi travel, as well as lodging and guesthouse expenses, were included (Method: GHG Protocol - DEFRA E22-27) **7- Employee commuting** All personnel and other guests entering the facility were included. The visitor log was included in the scope (Method: GHG Protocol - DEFRA D77 (Business Travel Land, Average Local Bus, D81 - Defra 2025_Business Travel Land_Average Car_Unknown I49)

	9- Downstream transportation and distribution All Sales (Land + Rail) (Method: GHG Protocol - DEFRA L48, E145) **12- End-of-life treatment of sold products** Based on concrete end of life. (Method: GHG Protocol - DEFRA)
29.a.iii.2	**Why we choose the measurement approach, inputs, and assumptions used to measure greenhouse gas emissions**
	To measure greenhouse gas emissions, activity data is determined primarily using floor scales, silos, storage hall stock levels, invoices, and meters. Measurement methods that provide the least uncertainty and most reliable data are selected. For uncertainty calculations, the Non-Automatic Weighing Instruments Directive, calibration documents and device uncertainties are used in scales.
29.a.iii.3	**Changes made in the measurement approach, inputs and assumptions during the reporting period and the reasons for these changes**
	During the reporting period, input operational data was weighed on commercial ground scales instead of belt-type scales, and more reliable data with less uncertainty was used.
29.a.iv	**Scope 1 and Scope 2 emissions**
29.a.iv.1	**1. Consolidated group**
	Nuh Çimento, Nuh Yapı Ürünleri and Nuh Beton were calculated and consolidated separately..
29.a.iv.2	**Other investees excluded from paragraph 29.a.iv.1. (Affiliates, joint ventures and unconsolidated subsidiaries)**
	Not available.
29.a.v	**Location-based Scope 2 greenhouse gas emissions and contractual instruments related to Scope 2 greenhouse gas emissions**
	In the Scope 2 calculations for Nuh Çimento, Nuh Yapı Ürünleri, and Nuh Beton facilities located in the Hereke location, the Ministry of Energy and Natural Resources' electricity generation and consumption point emission factors are used to calculate emissions from externally purchased electricity. Invoices were used as operational data. During the reporting period, none of our group companies used contract-based vehicles.
29.a.vi.1	**Categories included in Scope 3 greenhouse gas emission measurement**
	While calculating Scope 3 Indirect Greenhouse Gas Emissions of Nuh Çimento Group companies; • Category 1 - Purchased goods and services • Category 2 - Capital goods • Category 3 - Fuel and energy-related activities • Category 4 - Upstream transportation and distribution • Category 5 - Waste generated in operations • Category 6 - Business travel • Category 7 – Employee commuting • Category 9 - Downstream transportation and distribution • Category 12 - End-of-life treatment of sold products emission items are included. • Category 8 - Upstream leased assets - Since there are no leased vehicles, facilities, IT equipment, etc., this is excluded from coverage. • Category 10 - Processing of products sold - It was not included in the scope because its significance level was below 1%. • Category 11 - Use of products sold - Since cement is an intermediate product, there is no reporting requirement. (GHG Protocol wbcsd scope 3)

	• Category 13 - Downstream leased assets - Since there are no leased vehicles, facilities, IT equipment, etc., this is excluded from coverage. • Category 14 - Franchises - This category is not related to the cement industry. (GHG Protocol wbcsd scope 3 page 6,7) • Category 15 - Investments- This category is not related to the cement industry. (GHG Protocol wbcsd scope 3 page 6,7)
TSRS 2	
B56.a	**Scope 3 greenhouse gas emissions inputs in the value chain**
	In the calculation of Scope 3 greenhouse gas emissions, measurements within the value chain and records on SAP and DYS are used as input..
B56.b	**Verified inputs of Scope 3 greenhouse gas emissions**
	95% of our Scope 3 greenhouse gas emissions are measured using verified inputs.
B57	**How we manage Scope 3 greenhouse gas emissions when estimation is not possible**
	Scope 3 is calculated in all our companies.

Cross-industry metric categories

Climate-Related Transition Risks		
29.b	**The amount and percentage of assets vulnerable to climate-related transition risks, or**	-
29.b	**Amount and percentage of business activities vulnerable to climate-related transition risks**	100% (Transition to Lower Emission Technology and Digitalization -Nuh Çimento/Very High) 100% (Transition to Carbon-Based Regulations -Nuh Çimento/High) 100% Availability of Raw Materials and Additives -Nuh Beton/High)

Climate-Related Physical Risks		
29.c	**The amount and percentage of assets vulnerable to climate-related physical risks, or**	Based on the current risk analyses of our group companies' operations, the risks of "Extreme Weather Events" and "Decline in Water Resources" were identified as high effect climate-related financial risks at Nuh Çimento during the reporting period. However, the potential future effects of climate-related risks are regularly monitored, and risk assessment processes will be continually updated.
29.c	**Amount and percentage of business activities against climate-related physical risks**	%100 (Extreme Weather Events - Nuh Çimento/High) %100 (Decline in Water Resources - Nuh Çimento/High)

Climate-Related Opportunities		
TSRS 2		
29.d	**The amount and percentage of assets aligned with climate-related opportunities, or**	-
29.d	**Amount and percentage of business activities aligned with climate-related opportunities**	**CO1** 10% (Transition to Lower Emission Technology (Product) - Nuh Çimento/Very high) 2% (Transition to Lower Emission Technology (Product) - Nuh Beton/Low) 10% (Transition to Lower Emission Technology (Product) - Nuh Yapı Ürünleri/Low) **CO2** 5% (Transition to Lower Emission Technology (CO2 Reduction) - Nuh Çimento/Very high) 0% (Transition to Lower Emission Technology (CO2 Reduction) - Nuh Beton/ Very low) 0% (Transition to Lower Emission Technology (CO2 Reduction) - Nuh Yapı Ürünleri/Not available) **CO3** 10% (Resource Efficiency (Energy) - Nuh Çimento/High) 0% (Resource Efficiency (Energy) - Nuh Beton/Very low) 0% (Resource Efficiency (Energy) - Nuh Yapı Ürünleri/Not available)

Capital Allocation		
TSRS 2		
29.e	**Amount of capital expenditure, financing or investment allocated to climate-related risks and opportunities**	**2025** **Nuh Çimento** Electric vehicle investment: 159,865,093 ₺ Turbine & Generator Investment: 137,709,10 ₺ **Nuh Beton** Purchase of Two Electric Loaders: 27,390,554 ₺ **Nuh Yapı Ürünleri** Electric vehicle investment 14,510,826 TL

Internal Carbon Prices		
29.f.i	**A statement on whether and how the company applies a carbon price in its decision-making process**	We do not apply carbon prices to the decision-making processes in our companies. As Nuh Çimento Group, we plan to use an approximate price, which we call shadow price, when calculating the carbon burden or carbon reduction gain of our projects, since our internal carbon price has not yet been determined and national carbon fees have not been clarified. We informed the company internally in the first half of 2025 that the $30/tCO$_2$ carbon price (Shadow Carbon Price) proposed by SKD, of which we are a member, could be used in project evaluations until our internal carbon price is clarified.
29.f.ii	**The price per metric ton of greenhouse gas emissions used to value the costs of greenhouse gas emissions**	The price per metric ton of greenhouse gas emissions that our companies use to value the costs of greenhouse gas emissions is not available.

Remuneration		
29.g.i	**Whether and how climate considerations are included in executive compensation**	The Nuh Çimento Group's Remuneration Policy for Board Members and Senior Executives includes the following statement: The concrete efforts and contributions of executives and senior executives towards the success of the company and Environmental, Social and Governance (ESG) performance are a distinguishing criterion in bonus payments. There is no remuneration policy directly tied to sustainability and climate-related performance metrics.
29.g.ii	**Percentage of executive compensation recognized in the current period related to climate-related matters**	There is no executive compensation recognized in the current period, specifically in connection with climate-related matters. Due to the KVKK (Turkish Personal Data Protection Law) and confidentiality regulations, there is no climate-specific distinction in the senior executive salaries reflected collectively in the financial statements.

SASB - Construction Materials Sectoral Metrics					
Subject	**Metric**	**Category**	**Unit of Measurement**	**Nuh Çimento**	
				2024	**2025**
Greenhouse Gas Emissions	Gross total Scope 1 emissions	Quantitative	Metric ton (t)	3,584,953	3,925,663.83
	Percentage covered by emissions-limiting regulations	Quantitative	Percentage (%)	0	0
	Negotiation of long- and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and analysis of performance against these targets	Negotiation and Analysis	None	The relevant analysis is given extensively in the Nuh Çimento 2024 Integrated Annual Report on Pages 85-91.	The long- and short-term strategies for managing our emissions reduction targets are outlined on page 32 of this report. Our two-year performance data on emissions can be found on pages 49 and 50, while our analysis for 2025 is included in our climate targets tables
Air Quality	NOx (excluding N2O)	Quantitative	Metric ton (t)	It has not been provided because it is not related to our risks and opportunities regarding the TSRS.	
	SOx	Quantitative	Metric ton (t)		
	Particulate matter (PM10)	Quantitative	Metric ton (t)		
	Dioxins/furans	Quantitative	Metric ton (t)		
	Volatile organic compounds (VOCs)	Quantitative	Metric ton (t)		
	Polycyclic aromatic hydrocarbons (PAHs)	Quantitative	Metric ton (t)		
	Heavy metals	Quantitative	Metric ton (t)		
Energy Management	Total energy consumed	Quantitative	Gigajoule (GJ)	**16,566,018**	**17,721,963**
	Percentage of grid electricity	Quantitative	Percentage (%)	8.3%	8.19%
	Percentage of alternative energy	Quantitative	Percentage (%)	0.8%	0.89%
	Percentage of renewable energy	Quantitative	Percentage (%)	2.6%	2.84%
Water Management	Total water withdrawn	Quantitative	One thousand cubic meters (m^3)	It is included on page 47 of the report.	
	Total water consumed	Quantitative	One thousand cubic meters (m^3)		
	The rate of water withdrawal in regions with *High or Extremely High Groundwater Stress*	Quantitative	Percentage (%)		
	The rate of water consumption in regions with *High or Extremely High Groundwater Stress*	Quantitative	Percentage (%)		
Waste Management	Amount of waste generated	Quantitative	Metric ton (t)	It has not been provided because it is not related to our risks and opportunities regarding the TSRS.	
	Dangerous percentage	Quantitative	Percentage (%)		
	Percentage recycled	Quantitative	Percentage (%)		

SASB - Construction Materials Sectoral Metrics					
Subject	**Metric**	**Category**	**Unit of Measurement**	**Nuh Çimento**	
				2024	**2025**
Product Innovation	The percentage of products eligible for credits in sustainable building design and construction certifications	Quantitative	Percentage (%) of annual sales revenue	**Percentage of green products** Total sales: 46% Domestic sales: 95% (EFR 2024)	**Percentage of green products** Total sales: 40% Domestic sales: 92%
Subject	**Metric**	**Category**	**Unit of Measurement**	**Nuh Çimento**	
				2024	**2025**
Activity Metric	Production by main product group	Quantitative	Metric ton (t)	It is included in the **Nuh Çimento Group in Figures** section.	

SASB - Construction Materials Sectoral Metrics					
Subject	**Metric**	**Category**	**Unit of Measurement**	**Nuh Beton**	
				2024	**2025**
Greenhouse Gas Emissions	Gross total Scope 1 emissions	Quantitative	Metric ton (t)	43,335	16,915.92
	Percentage covered by emissions-limiting regulations	Quantitative	Percentage (%)	0	0
	Negotiation of long- and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and analysis of performance against these targets	Negotiation and Analysis	None	Since there was no reduction target for 2024, the reduction was not realized.	Our two-year performance data can be found on pages 49 and 50 of this report.
Air Quality	NOx (excluding N2O)	Quantitative	Metric ton (t)	It has not been provided because it is not related to our risks and opportunities regarding the TSRS.	
	SOx	Quantitative	Metric ton (t)		
	Particulate matter (PM10)	Quantitative	Metric ton (t)		
	Dioxins/furans	Quantitative	Metric ton (t)		
	Volatile organic compounds (VOCs)	Quantitative	Metric ton (t)		
	Polycyclic aromatic hydrocarbons (PAHs)	Quantitative	Metric ton (t)		
	Heavy metals	Quantitative	Metric ton (t)		
Energy Management	Total energy consumed	Quantitative	Gigajoule (GJ)	**18,938,083**	**16,768.86**
	Percentage of grid electricity	Quantitative	Percentage (%)	100%	100%
	Percentage of alternative energy	Quantitative	Percentage (%)	0%	0%
	Percentage of renewable energy	Quantitative	Percentage (%)	0%	0%
Water Management	Total water withdrawn	Quantitative	One thousand cubic meters (m^3)	It is included on page 47 of the report.	
	Total water consumed	Quantitative	One thousand cubic meters (m^3)		
	The rate of water withdrawal in regions with *High or Extremely High Groundwater Stress*	Quantitative	Percentage (%)		
	The rate of water consumption in regions with *High or Extremely High Groundwater Stress*	Quantitative	Percentage (%)		
Waste Management	Amount of waste generated	Quantitative	Metric ton (t)	It has not been provided because it is not related to our risks and opportunities regarding the TSRS.	
	Dangerous percentage	Quantitative	Percentage (%)		
	Percentage recycled	Quantitative	Percentage (%)		

Subject	Metric	Category	Unit of Measurement	Nuh Beton	
				2024	2025
Product Innovation	The percentage of products eligible for credits in sustainable building design and construction certifications	Quantitative	Percentage (%) of annual sales revenue	Our product is not available with this feature.	Our product is not available with this feature.
Subject	**Metric**	**Category**	**Unit of Measurement**	**Nuh Beton**	
Activity Metric	Production by main product group	Quantitative	Metric ton (t)	It is included in the **Nuh Çimento Group in Figures** section.	

SASB - Construction Materials Sectoral Metrics					
Subject	**Metric**	**Category**	**Unit of Measurement**	**Nuh Yapı Ürünleri**	
				2024	**2025**
Greenhouse Gas Emissions	Gross total Scope 1 emissions	Quantitative	Metric ton (t)	237,004	179,950.53
	Percentage covered by emissions-limiting regulations	Quantitative	Percentage (%)	0	0
	Negotiation of long- and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and analysis of performance against these targets	Negotiation and Analysis	None	Since there was no reduction target for 2024, the reduction was not realized.	Our two-year performance data can be found on pages 49 and 50 of this report.
Air Quality	NOx (excluding N2O)	Quantitative	Metric ton (t)	It has not been provided because it is not related to our risks and opportunities regarding the TSRS.	
	SOx	Quantitative	Metric ton (t)		
	Particulate matter (PM10)	Quantitative	Metric ton (t)		
	Dioxins/furans	Quantitative	Metric ton (t)		
	Volatile organic compounds (VOCs)	Quantitative	Metric ton (t)		
	Polycyclic aromatic hydrocarbons (PAHs)	Quantitative	Metric ton (t)		
	Heavy metals	Quantitative	Metric ton (t)		
Energy Management	Total energy consumed	Quantitative	Gigajoule (GJ)	**83,427.36**	**89,044.99**
	Percentage of grid electricity	Quantitative	Percentage (%)	100%	100%
	Percentage of alternative energy	Quantitative	Percentage (%)	0%	0%
	Percentage of renewable energy	Quantitative	Percentage (%)	0%	0%
Water Management	Total water withdrawn	Quantitative	One thousand cubic meters (m^3)	It is included on page 47 of the report.	
	Total water consumed	Quantitative	One thousand cubic meters (m^3)		
	The rate of water withdrawal in regions with *High or Extremely High Groundwater Stress*	Quantitative	Percentage (%)		
	The rate of water consumption in regions with *High or Extremely High Groundwater Stress*	Quantitative	Percentage (%)		
Waste Management	Amount of waste generated	Quantitative	Metric ton (t)	It has not been provided because it is not related to our risks and opportunities regarding the TSRS.	
	Dangerous percentage	Quantitative	Percentage (%)		
	Percentage recycled	Quantitative	Percentage (%)		

Subject	Metric	Category	Unit of Measurement	Nuh Yapı Ürünleri	
				2024	2025
Product Innovation	The percentage of products eligible for credits in sustainable building design and construction certifications	Quantitative	Percentage (%) of annual sales revenue	Our product is not available with this feature.	Our product is not available with this feature.
Subject	**Metric**	**Category**	**Unit of Measurement**	**Nuh Yapı Ürünleri**	
Activity Metric	Production by main product group	Quantitative	Metric ton (t)	It is included in the **Nuh Çimento Group in Figures** section.	

TSRS 2 Targets

Climate Targets-1 (Nuh Çimento)		
TSRS 2		
28.c - 33	**Target Name/Description**	Net Zero
33.a	**Metric**	CO_2e ton/year
33.b	**Objective of the Target**	Reduction
33.c	**The Part of the Entity to Which the Target Applies**	Nuh Çimento (The affiliated company Çim-Nak Taşımacılık Ltd. Şti. is also included in the scope of the target.)
33.d	**Valid Period**	2050
33.e	**Base Period for Measuring Progress**	2017
33.f	**Milestones**	2025-2030
33.f	**Interim Targets**	By 2030; Scope 1-Cement-like 21% reduction & Clinker 14% reduction
33.g	**Absolute/Intensity**	Absolute
33.h	**Description**	It supports Türkiye's commitments to the Paris Climate Agreement and the 2053 target.
34.a	**Verification**	The scope for 2025 is 1-2-3 verified.
34.b	**Review Processes**	Annual greenhouse gas emissions are calculated and compared with the previous year and the base year of 2017.
34.c	**Progress Metric**	CO_2e ton/year
34.d	**Revisions**	None.
35	**Performance**	Our two-year performance data is included on pages 49 and 50 of this report.

Climate Targets-2 (Nuh Çimento)				
TSRS 2				
28.c - 33	**Target Name/Description**	Reducing Scope 1 emissions		
33.a	**Metric**	Clinker (kg CO_2e/ton Clinker)	Cement (kg CO_2e/ton Cement)	Cement-like (kg CO_2e/ton Cement-like)
33.b	**Objective of the Target**	Reduction	Reduction	Reduction
33.c	**The Part of the Entity to Which the Target Applies**	Nuh Çimento (Çim-Nak Taşımacılık Ltd. Şti. is also included in the scope of the target.)	Nuh Çimento (Çim-Nak Taşımacılık Ltd. Şti. is also included in the scope of the target.)	Nuh Çimento (Çim-Nak Taşımacılık Ltd. Şti. is also included in the scope of the target.)
33.d	**Valid Period**	2025 – (Maximum) 874 Actual: 872 2026: Maximum 872	2025 – (Maximum) 770 Actual: 771 2026: Maximum 771	2025 – (Maximum) 770 Actual: 783 2026: Maximum 785
33.e	**Base Period for Measuring Progress**	2024 - 872	2024 - 769	2024 - 785
33.f	**Milestones**	Not available.	Not available.	Not available.
33.f	**Interim Targets**	2030- 14% Reduction	Not available.	2030- 21% Reduction
33.g	**Absolute/Intensity**	Intensity	Intensity	Intensity
33.h	**Description**	It supports Türkiye's commitments to the Paris Climate Agreement and the 2053 target.	It supports Türkiye's commitments to the Paris Climate Agreement and the 2053 target.	It supports Türkiye's commitments to the Paris Climate Agreement and the 2053 target.
34.a	**Verification**	Data is calculated from our verified gross greenhouse gas emissions.	Data is calculated from our verified gross greenhouse gas emissions.	Data is calculated from our verified gross greenhouse gas emissions.
34.b	**Review Processes**	Annual	Annual	Annual
34.c	**Progress Metric**	(kg CO_2e/ton Clinker)	(kg CO_2e/ton Cement)	(kg CO_2e/ton Cement-like)
34.d	**Revisions**	None.	None.	None.
35	**Performance**	2025 – 872* ** The emission rate achieved was lower than the target.*	2025 – 771* ** Since the calculation was based on cement production volume, the target value was nearly met, with the actual figure exceeding the target by only 1 kg.*	2025 – 783* ** Due to the lack of sales of blast furnace slag and the continued sales of clinker, the relevant indicator exceeded the target value.*
	Due to changes in fuel composition, the addition of new units, and new production policies, the base period has been set as 2024, which is the most appropriate year.			

Climate Targets-3 (Nuh Çimento)				
TSRS 2				
28.c - 33	**Target Name/Description**	Reducing Scope 1+2 emissions		
33.a	**Metric**	Clinker (kg CO_2e/ton Clinker)	Cement (kg CO_2e/ton Cement)	Cement-like (kg CO_2e/ton Cement-like)
33.b	**Objective of the Target**	Reduction	Reduction	Reduction
33.c	**The Part of the Entity to Which the Target Applies**	Nuh Çimento (Çim-Nak Taşımacılık Ltd. Şti. is also included in the scope of the target.)	Nuh Çimento (Çim-Nak Taşımacılık Ltd. Şti. is also included in the scope of the target.)	Nuh Çimento (Çim-Nak Taşımacılık Ltd. Şti. is also included in the scope of the target.)
33.d	**Valid Period**	2025 Target – (Max.) 915 Actual: 912 2026 Maximum: 912	2025 Target – (Max.) 805 Actual: 806 2026 Maximum: 806	2025 Target – (Max.) 805 Actual: 818 2026 Maximum: 820
33.e	**Base Period for Measuring Progress**	2024 - 913	2024 - 805	2024 - 822
33.f	**Milestones**	Not available.	Not available.	Not available.
33.f	**Interim Targets**	2030- 12% reduction	Not available.	2030- 22% reduction
33.g	**Absolute/Intensity**	Intensity	Intensity	Intensity
33.h	**Description**	It supports Türkiye's commitments to the Paris Climate Agreement and the 2053 target.	It supports Türkiye's commitments to the Paris Climate Agreement and the 2053 target.	It supports Türkiye's commitments to the Paris Climate Agreement and the 2053 target.
34.a	**Verification**	Data is calculated from our verified gross greenhouse gas emissions.	Data is calculated from our verified gross greenhouse gas emissions.	Data is calculated from our verified gross greenhouse gas emissions.
34.b	**Review Processes**	Annual	Annual	Annual
34.c	**Progress Metric**	(kg CO_2e/ton Clinker)	(kg CO_2e/ton Cement)	(kg CO_2e/ton Cement-like)
34.d	**Revisions**	None.	None.	None.
35	**Performance**	2025 – 912* ** The emission rate achieved was lower than the target.*	2025 – 806* ** Since the calculation was based on cement production volume, the target value was nearly met, with the actual figure exceeding the target by only 1 kg.*	20218 – 818* ** Due to the lack of sales of blast furnace slag and the continued sales of clinker, the relevant indicator exceeded the target value.*
	Due to changes in fuel composition, the addition of new units, and new production policies, the base period has been set as 2024, which is the most appropriate year.			

Our statements regarding greenhouse gas emission targets		
TSRS 2		
36.a **36.b**	**Greenhouse gas emissions within the target**	Scope 1 and 2 greenhouse gas emissions are within our scope.
36.c	**Type of target**	Along with our short-term carbon intensity targets per ton of product, our 2050 Net Zero Goal is a gross greenhouse gas emission target.
36.d	**Decarbonization approach**	We have set our decarbonisation targets in line with Europe's CEMBUREAU Carbon Net Zero Targets and Carbon Reduction Roadmaps.
36.e	**Planned carbon credit use**	There was no carbon credit usage during the reporting period. In the coming period, a plan will be made based on the Emission Trading System, which is expected to be finalized in the country, and the CBAM data, which will be financially activated.
36.e.i	**Carbon credit share in targets**	Our targets are not based on carbon credits.
36.e.ii	**Verification of carbon credits**	We did not use carbon credits during the reporting period. As of the report's publication date, we have no plans to do so.
36.e.iii	**Type of carbon credit**	We did not use carbon credits during the reporting period. As of the report's publication date, we have no plans to do so.
36.e.iv	**Other Descriptions on carbon credits**	We did not use carbon credits during the reporting period. As of the report's publication date, we have no plans to do so.

APPENDIX

Other Disclosures

Judgments	
TSRS 1	
74	We can summarize the judgments that have the most significant effect on the preparation process of sustainability-related financial Descriptions and the information contained in these Descriptions as follows: 1- The judgments we make when making financial calculations regarding risks and opportunities are available in the relevant Descriptions of the risk-opportunity inventories. 2- Due to Türkiye-EU trade relations, we determined the maturities of our relevant risks with judgment, based on the idea that the emissions trading system to be established in Türkiye will be designed in parallel with the EU ETS system.

Measurement Uncertainty	
TSRS 1	
77	When calculating the financial effects of risks and opportunities, risk-related assumptions were made by qualified managers. The financial equivalents of the risks envisioned in these assumptions may be affected by various uncertainties. The issues with the highest uncertainty that could affect the reported amounts are changes in carbon markets, wars in the world and Türkiye's region, financial crisis, and positive and negative developments related to the climate.
78.a	Our statement, which includes a high level of measurement uncertainty, is a risk item we see due to the lack of clarity regarding carbon prices and the ETS system in Türkiye. The risk here was anticipated to be significant, but due to uncertainties, a figure could not be shared.
78.b	Descriptions regarding amounts for which we see high measurement uncertainty
78.b.i	This uncertainty amount may change depending on the unit price of carbon in the Turkish ETS system, the rate of free allowances, and the plan to be presented regarding the removal of free allowances
78.b.ii	As Nuh Çimento, based on the assumptions we have obtained from the meetings held with the ministries and the Climate Change Presidency, and from the studies carried out under the umbrella of Türk Çimento, we have made assumptions that the ETS system will come into effect in 2027 and that free allocations will be given to the cement sector in the first place. While making the judgment, it was evaluated that the ETS model to be established in Türkiye would operate similarly to the ETS model in Europe.

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NUH ÇİMENTO SANAYİ A.Ş. AND ITS SUBSIDIARIES
INDEPENDENT AUDITOR'S LIMITED ASSURANCE REPORT ON THE INFORMATION PRESENTED IN ACCORDANCE WITH THE TURKISH SUSTAINABILITY REPORTING STANDARDS

To the General Assembly of Nuh
Çimento Sanayi A.Ş.,

We have undertaken a limited assurance engagement on the information ("Sustainability Information") presented in the Sustainability Report of Nuh Çimento Sanayi A.Ş. and its subsidiaries (together referred to as the "Group") for the year ended on 31 December 2025, prepared in accordance with Turkish Sustainability Reporting Standard 1 "General Requirements for Description of Sustainability Related Financial Information" and Turkish Sustainability Reporting Standard 2 "Climate Related Descriptions".

Our assurance engagement does not cover information relating to prior periods or other information associated with the Sustainability Information (including, without limitation, any images, audio files, website links, or embedded videos).

Limited Assurance Conclusion

Based on the procedures we performed and the evidence we obtained, as described in the section "Summary of Work Performed as Basis for Conclusion", nothing has come to our attention that causes us to believe that the Sustainability Information presented in the Group's Sustainability Report for the year ended on 31 December 2025 has not been prepared, in all material respects, in accordance with the Turkish Sustainability Reporting Standards ("TSRS") as issued by the Public Oversight Accounting and Auditing Standards Authority ("KGK") in the Official Gazette dated 29 December 2023 and numbered 32414(M).

We make no assurances regarding any other information associated with the sustainability information (including any images, audio files, website links, or embedded videos).

Structural Constraints in the Preparation of Sustainability Information

Sustainability Information is subject to structural uncertainties arising from gaps in scientific and economic knowledge. Insufficient scientific knowledge regarding the calculation of greenhouse gas emissions contributes to this uncertainty. Additionally, due to a lack of data regarding the likelihood, timing, and impacts of potential future physical and transition-phase climate risks, Sustainability Information contains uncertainties based on climate-related scenarios

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Responsibilities of Management and Those Responsible for Senior Management Regarding Sustainability Information

Group Management is responsible for the following:

Preparing Sustainability Information in accordance with the principles of the Turkish Sustainability Reporting Standards,

Designing, implementing, and maintaining internal controls related to the preparation of Sustainability Information that is free from material misstatements due to error or fraud,

In addition, Group Management is responsible for selecting and implementing appropriate sustainability reporting methods and for making reasonable assumptions and estimates appropriate to the circumstances.

Those responsible for Senior Management are responsible for overseeing the Group's sustainability reporting process.

The Independent Auditor's Responsibilities Regarding the Limited Assurance Review of Sustainability Information

We are responsible for the following:

Planning and performing the assurance engagement to obtain limited assurance regarding whether the Sustainability Information contains material misstatements due to error or fraud,

Reaching an independent conclusion based on the evidence we have obtained and the procedures we have performed, and communicating our conclusion to Group management.

Risk assessment procedures were performed not to provide assurance regarding the effectiveness of the Group's internal control, but to understand the internal control structure and to identify and assess the risks of material misstatements in the Sustainability Information arising from errors or fraud.

Areas of the Sustainability Information that could contain material misstatements were identified, and procedures targeting these areas were designed and implemented. Since fraud may involve issues such as collusive transactions, forgery, the intentional omission of transactions from records, or the deliberate provision of false statements to the auditor, or breaches of internal controls, the risk of failing to detect a material misstatement due to fraud is higher than the risk of failing to detect a material misstatement due to error.

Misstatements may result from error or fraud. Misstatements are considered material if, individually or in the aggregate, they are reasonably expected to influence the economic decisions that users of the Sustainability Information make in reliance on such information.

Because we are responsible for issuing an independent opinion on the Sustainability Information prepared by management, we are not permitted to be involved in the preparation process of the Sustainability Information to ensure that our independence is not compromised.

Implementation of Professional Standards

We conducted a limited assurance engagement in accordance with Assurance Engagement Standard 3000, "Assurance Engagements Other Than Audits or Reviews of Historical Financial Information," and, with respect to greenhouse gas emissions included in the sustainability information, Assurance Engagement Standard 3410, "Assurance Engagements on Greenhouse Gas Statements," as published by the Public Oversight Accounting and Auditing Standards Authority (KGK).

Independence and Quality Control

We have acted in accordance with the independence provisions and other ethical provisions set forth in the Code of Ethics for Independent Auditors (including the Independence Standards) ("Code of Ethics"), published by the KGK and based on the fundamental principles of integrity, impartiality, professional competence and due care, confidentiality, and professional conduct.

Our company implements the provisions of Quality Management Standard I and, in this regard, maintains a comprehensive quality control system, including written policies and procedures regarding compliance with ethical provisions, professional standards, and applicable legal regulations.

Our work was performed by an independent, multidisciplinary team comprising auditors and sustainability and risk experts. We have utilized the work of our expert team to assist in evaluating the reasonableness of the information and assumptions regarding the Group's climate and sustainability-related risks and opportunities. We are solely responsible for the assurance conclusion we provide.

Summary of the Work Conducted as a Basis for the Assurance Conclusion

We must plan and carry out our work to address the areas where we have identified a high likelihood of material misstatements in the Sustainability Information. The procedures we apply are based on our professional judgment. When conducting a limited assurance engagement on the Sustainability Information:

- Face-to-face and online interviews were conducted with the Group's key senior personnel to understand the processes in place for obtaining Sustainability Information for the reporting period.
- The Group's internal documentation was used to evaluate and review sustainability-related information.
- An assessment of the Description and presentation of sustainability-related information was performed.
- Through inquiries, an understanding was gained regarding the Group's control environment and information systems related to the preparation of Sustainability Information. However, the design of specific control activities was not evaluated, evidence regarding their implementation was not obtained, and the effectiveness of their operation was not tested.
- We assessed whether the Group's methods for developing estimates were appropriate and applied consistently. However, our procedures do not include testing the data on which the estimates are based or developing our own estimates to evaluate the Group's estimates.
- We understood the processes related to identifying risks and opportunities deemed financially significant in conjunction with the Group's sustainability reporting processes.

The procedures applied in a limited assurance engagement differ from those in a reasonable assurance engagement in terms of nature and timing, and the scope is narrower. Consequently, the level of assurance obtained in a limited assurance engagement is significantly lower than the level of assurance that would have been obtained had a reasonable assurance engagement been performed.

Istanbul,
February 19, 2026

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