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the Year Ended 31 December 2024 and the
Independent Auditor's Report

As Enerjisa, we are working with all our energy to create a better future for everyone.

Despite all conditions, we continue to achieve our goals with our strong balance sheet and robust risk management. Thanks to our resilient business model and the dedication of all of our employees we deliver on our promises to our stakeholders and maintain our financial stability.

In line with our sustainable growth objective, we focus on projects and partnerships that will benefit society. While leading Türkiye's energy transition, we move rapidly toward a better future with our agile and resilient structure.

We are investing into the grids of tomorrow for a better future

We are making energy more accessible with our grid investments, and are working towards a better future. Driven by our strong financial performance stemming from our operational excellence, we are moving on this path confidently and sustainably.



We are benefitting from the power of the sun for a better future

With our investments into photovoltaic projects, we are building a sustainable future. We have increased the capacity of our commissioned solar power plant (SPP) projects by 3.5 times compared to the previous year, reaching a total installed capacity of 102.4 MWp by the end of 2024. As part of our energy efficiency solutions, we have implemented over 50 projects with the potential to achieve approximately 80,000 MWh of annual energy savings. Through all these services, we continue to lead the energy transition in Türkiye for a better future.



We believe in the potential of the youth for a better future

We believe that a better future lies with the youth. At our Enerjisa Enerji Technology and Impact Center, which stands out with its digitally equipped and interactive Energy Tunnel, we are unlocking the potential of our youth. Through innovation and entrepreneurship training, we support them in turning their dreams into reality while providing them experience with innovative applications and the digital transformation within the energy sector.

750

STUDENTS REACHED
WITH SABANCI YOUTH
CAMPAIGN



We continue our investments in e-mobility for a better future

With Eşarj, we have established a widespread fast-charging network with over 2,500 charging plugs across Türkiye. Through our fast-charging technologies and innovative solutions, we make life easier for electric vehicle users with a customer-centric approach. We continue our work towards a more sustainable mobility and a better future.

2,563

CHARGING PLUGS IN

1,508

LOCATIONS



2024

2024 at a Glance

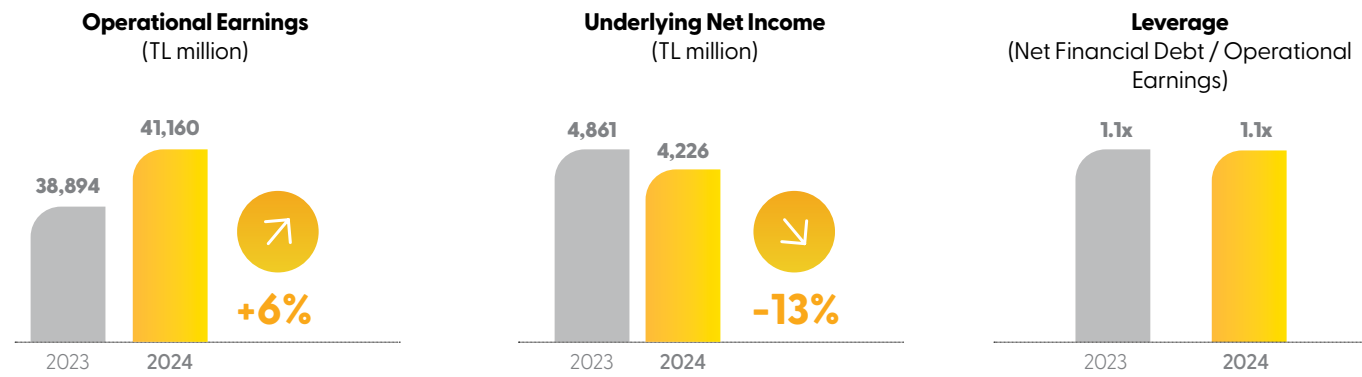
- Enerjisa successfully continued its growth path in 2024 and delivered on all the targets of the 2024 guidance, posting adjusted Operational Earnings of TL 41.2 billion and adjusted underlying net income of TL 4.2 billion for the 2024 financial year.
- New dividend policy of at least 80% pay-out of Underlying Net Income to maintain attractive shareholder remuneration under Inflation Accounting (IAS29) and accordingly, gross dividend of TL 2.87 per share will be proposed during the General Assembly for the 2024 financial year.
- Investment pace was maintained and a total of TL 15.5 billion was invested in 2024.
- Net Financial Debt Factor to Operational Earnings ratio was successfully maintained at a very low level of 1.1x despite the high interest rate environment.
- Received an ESG grade of 85/100 from Refinitiv, ranking 6th out of 315 in global ranking of electric utilities & IPP Companies that contributed to the platform.
- Enerjisa raised its Carbon Disclosure Project (CDP) Climate Change score to A and maintained its CDP Water Security score at A, sustaining its place on the CDP Global A List.

Note: All financial figures in this report are given under inflation accounting unless otherwise stated.

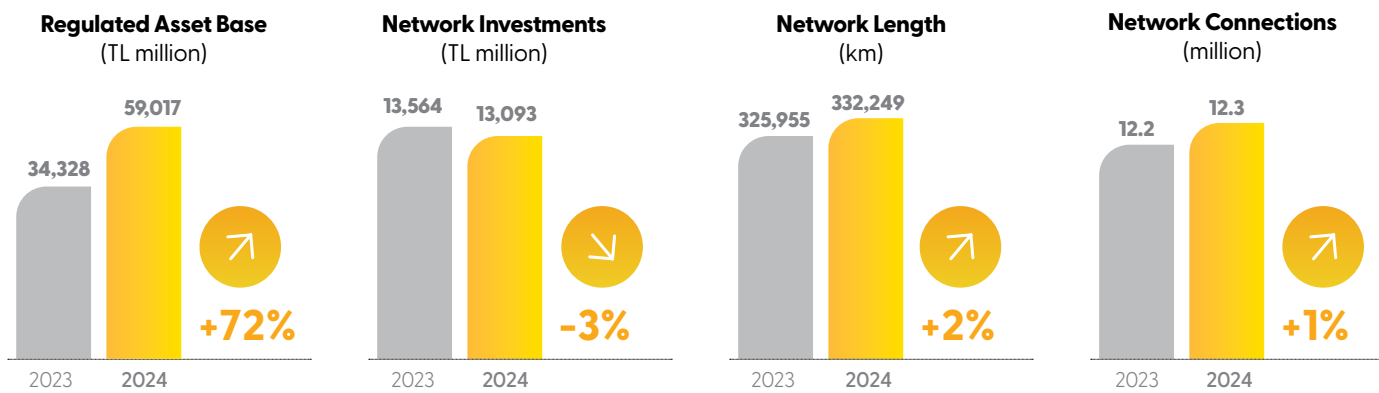


KEY OPERATIONAL AND FINANCIAL INDICATORS

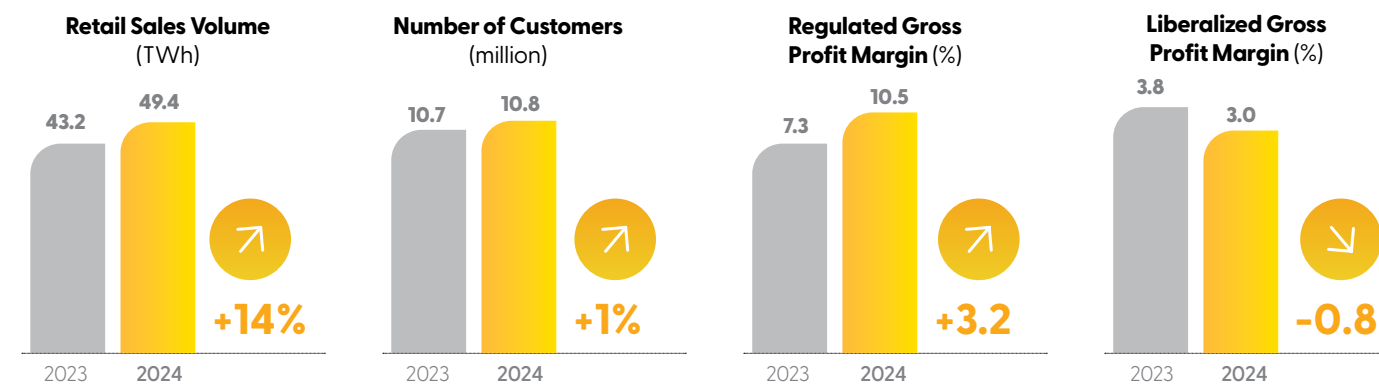
Key Financial Indicators



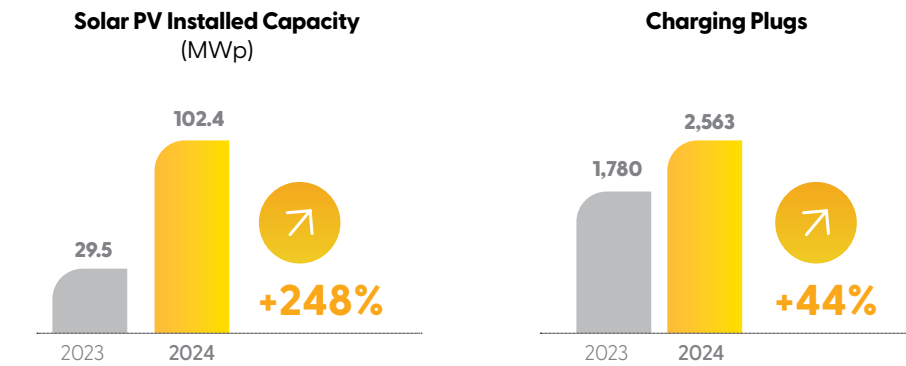
Distribution Operational Indicators



Retail Sales Operational Indicators



Customer Solutions Operational Indicators



	2023	2024
Consolidated		
Operational Earnings* (TL million)	38,894	41,160
Underlying Net Income (TL million)	4,861	4,226
Free Cash Flow (after interest & tax) (TL million)	-21,528	-12,612
Economic Net Debt (TL million)	51,952	55,771
Leverage (Net Financial Debt/Operational Earnings)	1.1x	1.1x
Distribution		
Operational Earnings (TL million)	31,389	33,844
Regulated Asset Base (TL million)	34,328	59,017
Network Investments (TL million)	13,564	13,093
Network Connections (million)	12.2	12.3
Network Length (km)	325,955	332,249
Retail Sales		
Retail Sales Operational Earnings (TL million)	6,100	4,575
Retail Sales Volume (TWh)	43.2	49.4
Number of Customers (million)	10.7	10.8
Regulated Gross Profit Margin (%)	7.3%	10.5%
Liberalized Gross Profit Margin (%)	3.8%	3.0%
Customer Solutions		
Customer Solutions Operational Earnings (TL million)	1,691	2,998
Solar Power - Installed Capacity (MWp)	29.5	102.4
Combined Heat and Power (MW)	3.8	3.8
Charging Plugs	1,780	2,563
Charging Locations	1,003	1,508

* Operational Earnings refers to EBITDA plus CAPEX reimbursements excluding exceptional items.

Note: Unless otherwise stated all figures are stated under inflation accounting



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ABOUT ENERJISA

Enerjisa Enerji is Türkiye's leading energy transition company.

10.8
million
CUSTOMERS

Enerjisa Enerji operates as Türkiye's leading company in electricity distribution, retail sales and customer solutions. Reaching a population of 22.1 million with more than 10 thousand employees, the Company serves 10.8 million customers within 14 provinces across 3 distribution regions.

Incorporated in 1996, Enerjisa Enerji is the leading player of Türkiye's developing electricity market with its grid investments, innovative solutions, efficiency- and technology-focused business models catering to its customers and the sector as well as its competitive strategies.

Enerjisa Enerji devises its long-term strategy with a sustainable approach. The Company aims to grow profitably and create value for its shareholders

by expanding its high-quality grid in its distribution regions, and continuing to extend its retail operations across the entire country.

Enerjisa Enerji provides its customers with numerous environmentally friendly and sustainable energy solutions, such as solar power plants, energy efficiency applications, cogeneration applications, electric vehicle-charging stations, and green energy certification, under the umbrella of "Energy of My Business."

In Türkiye's largest private sector initial public offering (IPO) as of February 8, 2018, 20% of Enerjisa Enerji (remaining equity is equally owned by Sabancı Holding and E.ON) shares were offered to the public via listing on Borsa Istanbul. Attesting to keen investor interest during the book-building process, the shares were 4.8x oversubscribed. Enerjisa Enerji was included in FTSE All-World Index as of June 2018.

Following the successful public offering in 2018, Enerjisa Enerji focused on sustainability to develop a holistic approach regarding economic, environmental, and social factors, with the target of creating long-term value. Within this framework, Enerjisa Enerji became a signatory to the United Nations Global Compact Initiative (UN Global Compact), the world's largest voluntary corporate sustainability initiative, and the United Nations Women's Empowerment Principles

(WEPs) in 2019. In addition, the Company has committed to complying with the principles of Transparency International, evidencing its ambition to adhere to high ethical standards.

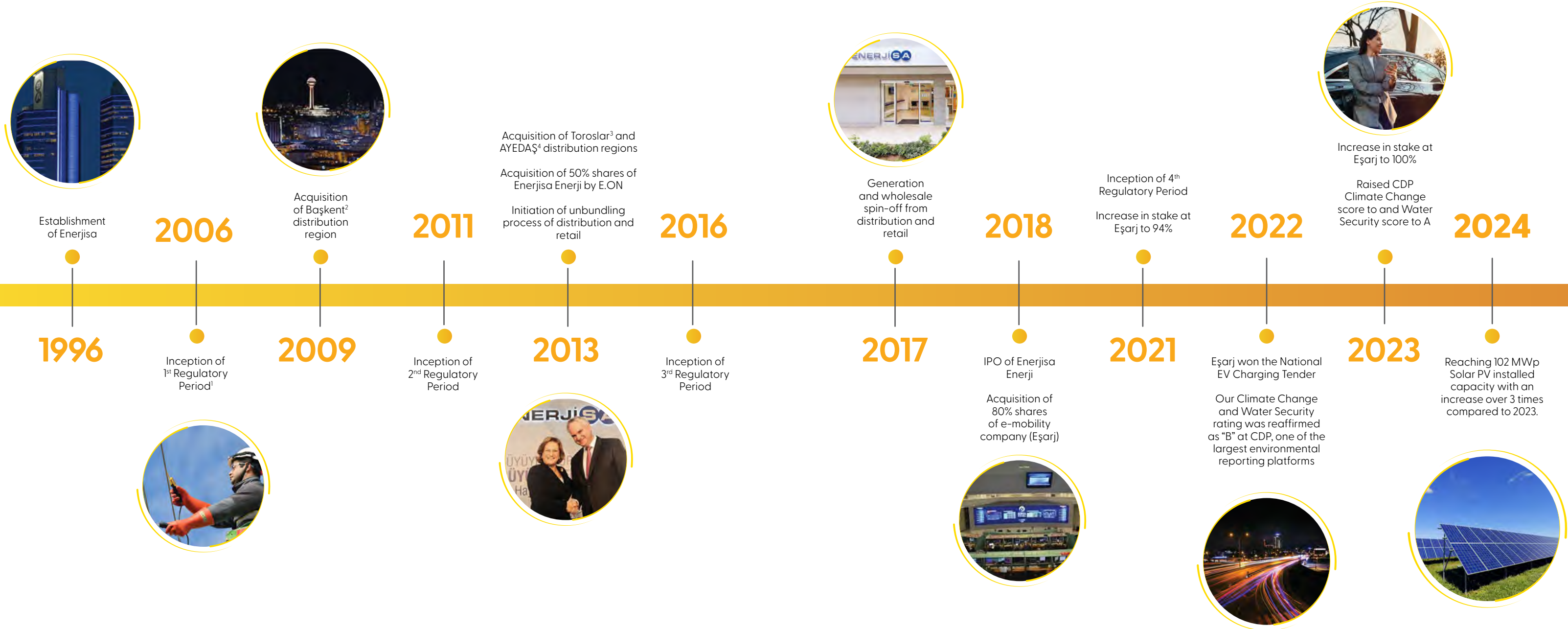
Enerjisa Enerji's Corporate Governance Rating increased to 96.76 out of 100 (9.68 out of 10) in 2024. Enerjisa Enerji thus improved its position in the BIST Corporate Governance Index among institutions with the highest corporate governance ratings. Since 2019, the Company has been featuring in the BIST Sustainability 25 Index, which is comprised of companies traded on Borsa Istanbul with exemplary corporate sustainability practices.

Enerjisa Enerji integrates Environmental, Social and Governance (ESG) factors into its strategy. The Company attaches utmost importance to sustaining its existence as a transparent, ethical and principled company based on its corporate governance structure, and within this framework to reporting ESG data. The Company resorted to independent audit opinion for major ESG indicators for the first time in 2021. Raising its SAHA Corporate Governance Rating to 96.76/100 in 2024, Enerjisa Enerji also continued to enhance its ESG performance in other assessments carried out by indices and assessment platforms in 2023.



ABOUT ENERJISA

HISTORY



¹Regulatory Period: Period of time at which the related tariff will be in effect, as approved by the Energy Market Regulatory Authority

²Başkent Elektrik Dağıtım A.Ş.

³Toroslar Elektrik Dağıtım A.Ş.

⁴Istanbul Anadolu Yakası Elektrik Dağıtım A.Ş.

ABOUT ENERJİSA

Enerjisa Enerji centrally manages and monitors all its distribution and retail sales activities in three regions.



Bilge İrem Boztaş Customer Technical Services Specialist (Toroşlar Distribution)

The motto "A Better Future" represents to me a journey that begins with a focus on people, contributing to society, the environment, and humanity, and passing these values down through generations. For a more sustainable world, we start with our future—children—by promoting energy savings and smart world awareness, contributing not only as a company but also on an individual level. As a leader in the distribution sector, Enerjisa supports every sustainable project, prioritizing people, and embarking on efficiency journeys that set an example for our country.

As the Commercial Losses Team, we work to prevent every bit of lost energy in alignment with the "A Better Future" motto. By leveraging smart technology, we prevent energy waste and public resource losses. We monitor energy end-to-end using sustainable and efficient technological devices. Through our own measurement systems, we ensure the proper distribution of energy and also prevent losses from undelivered energy. Ultimately, we constantly seek innovation and conduct engineering efforts to enhance efficiency in the cycle of life.

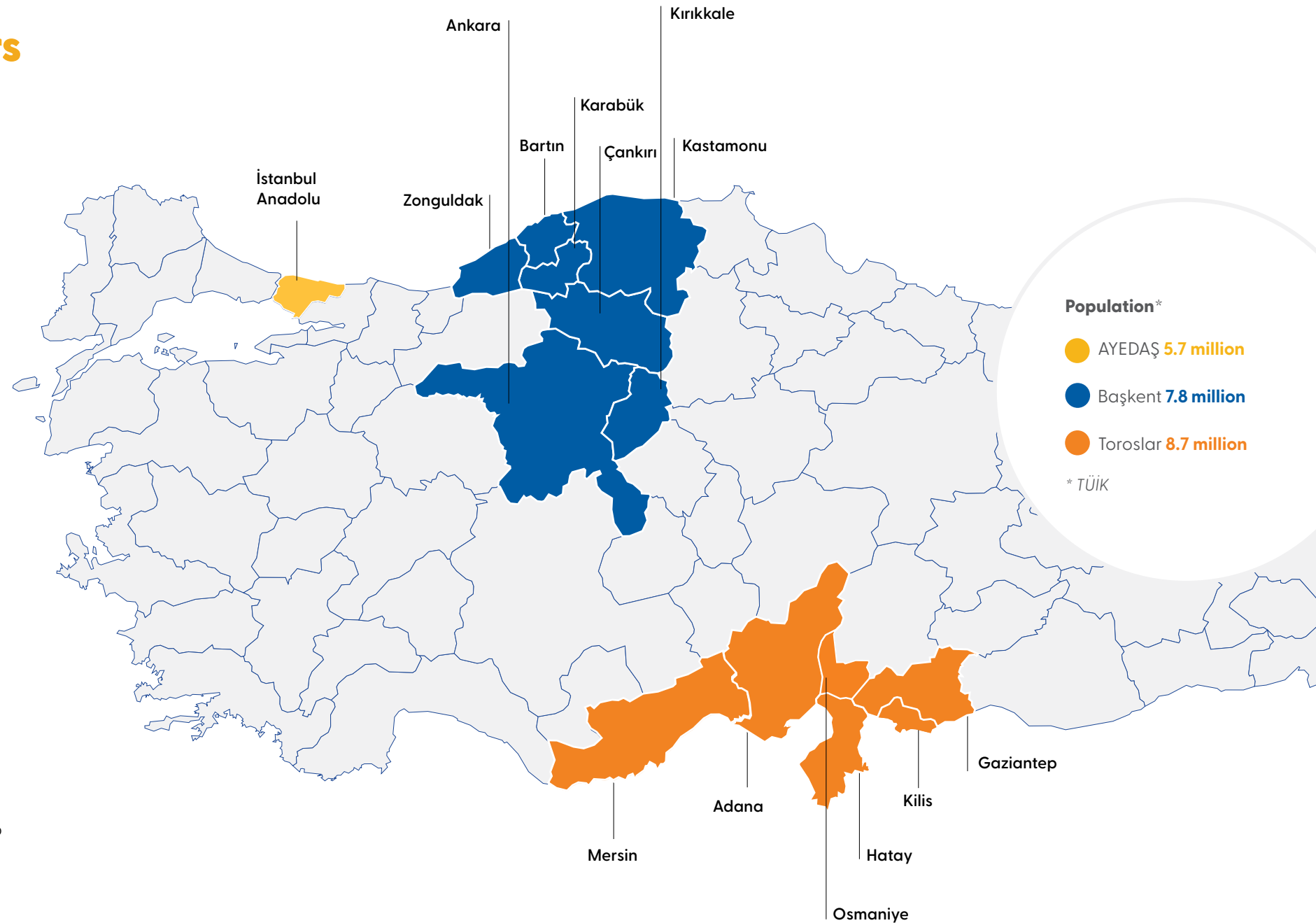
Türkiye's largest electricity distribution and retail sales company Enerjisa Enerji has approximately 12.3 million distribution network connections, and 10.9 million customers, accounting for approximately 21% of the retail electricity market as of December 31st, 2024.

Enerjisa Enerji carries out electricity distribution and retail sales operations through:

- Başkent Elektrik Dağıtım A.Ş. (Başkent EDAŞ) and Enerjisa Başkent Elektrik Perakende Satış A.Ş. (Başkent EPSAŞ) operating in the Başkent Region, which covers the provinces of Ankara, Zonguldak, Kastamonu, Kırıkkale, Karabük, Bartın and Çankırı.
- İstanbul Anadolu Yakası Elektrik Dağıtım A.Ş. (AYEDAŞ) and Enerjisa İstanbul Anadolu Yakası Elektrik Perakende Satış A.Ş. (AYESAŞ) operating in the AYEDAŞ Region, which covers districts on the Anatolian side of İstanbul.

- Toroşlar Elektrik Dağıtım A.Ş. (Toroşlar EDAŞ) and Enerjisa Toroşlar Elektrik Perakende Satış A.Ş. (Toroşlar EPSAŞ) operating in the Toroşlar Region, which covers the provinces of Adana, Gaziantep, Mersin, Hatay, Osmaniye and Kilis.

The regions at which Enerjisa Enerji operates as the incumbent supplier include the capital city Ankara, the Anatolian side of İstanbul, which is the largest city in Türkiye on a population basis, and major industrial and commercial cities with high population density, such as Adana, Gaziantep and Mersin. Enerjisa also offers electricity to eligible customers through the entire country.



ABOUT ENERJISA

Enerjisa Enerji meets the rapid growth in electricity demand, and creates value for its customers, business partners, shareholders and all stakeholders.



Soner Aptiş
Electricity Distribution Senior
Technical Officer (Başkent
Distribution)

"A Better Future" means, for me, the importance of the energy sector in ensuring a sustainable life and future for our country and the world. I believe that every contribution I make to my company and region carries a sense of hope for future generations.

At the forefront of 2024's events was a power outage in February that affected approximately 15,000 households. As a team, we worked under cold weather and challenging conditions for 8 hours to restore electricity. This incident showcased the best example of teamwork and solidarity.

One of the initiatives that makes me say, "I'm glad to work at Enerjisa," is the Youth Campaign. This project supports the development of innovative ideas. Additionally, with the Republic Campaign, I feel our company's respect for nature and the environment even more deeply. Enerjisa's approach provides hope for a better future.

Türkiye's economic growth and urbanization, digital transformation in all areas of life, and a young and dynamic population, signify substantial growth potential for electricity demand. Electricity today constitutes a vital need, much like air and water. Enerjisa Enerji meets the rapid growth in electricity demand with an efficient approach that focuses on people and technology, and creates sustainable value for all stakeholders.

Deriving its power from people and predicating its operations on the values of sincerity, passion, courage, sustained development and inclusion, Türkiye's agile and innovative energy company Enerjisa Enerji continues to generate sustainable energy solutions that touch human lives.

DISTRIBUTION

Electricity distribution activities are carried out by Başkent EDAŞ, AYEDAŞ and Toroslar EDAŞ. The operations of electricity distribution companies are restricted to the regions defined in their licenses.

Distribution is the delivery of electricity to end users via power lines with voltage level below 36 kV. Türkiye's distribution network is divided into 21 distribution regions, as defined by the "Electricity Privatization Strategy Document." Since the privatization got completed through 2009 to 2013, these regions have been operated by private distribution companies.



Each regional distribution network operator is responsible for;

- Operating the distribution network in its region,
- Making the required maintenance, repair, environment, security, renewal and expansion investments,
- Performing the maintenance and reading of electricity meters,
- Preparing demand projections and investment plans,
- Monitoring theft-loss rates,
- Supplying electricity to cover technical and commercial losses,

- Taking the necessary technical and operational measures to reduce theft-loss rates,
- Ensuring the lighting of public areas.

Enerjisa Enerji manages and monitors all its network operations in its three distribution regions, while planning and realizing its distribution network-related operations. As part of grid management processes, Enerjisa also engages in activities related to network expansion and renovation increasing the operational efficiency of the network

as well as research and development efforts. These activities enable Enerjisa to standardize network management processes in all three regions; devise centralized procedures determine key performance indicators such as compliance with the EMRA's technical, commercial and supply security standards, as well as outage and theft-loss targets; plan system improvements control and monitor local networks and conduct customer-related operations.

ABOUT ENERJISA

Enerjisa Enerji develops customer-focused alternative energy efficiency solutions.

102.4
MWp
SOLAR POWER
PLANT INSTALLED
CAPACITY

RETAIL SALES

Retail electricity sales activities are carried out by Başkent EPSAŞ, AYESAŞ and Toroslar EPSAŞ.

Retail electricity sales companies sell electricity exclusively to regulated consumers within the company's distribution regions as the incumbent retail companies, and to eligible consumers in their respective regions and in other parts of Türkiye without regional limitations.

In both segments, Enerjisa Enerji is the leader in Türkiye's retail electricity market in terms of both customer numbers and sales volume. Enerjisa Enerji, as the incumbent retail company sells electricity to regulated customers through regulated national tariffs in 14 provinces, and to eligible consumers across Türkiye. It also offers innovative products and services to 10.7 million customers, ranging from households to small or large enterprises. With its extensive field teams, the Company provides services through 35 customer service centres and 67 transaction centres, as well as via remote and on digital channels.

CUSTOMER SOLUTIONS

Enerjisa Enerji is dedicated to meeting customer needs with sustainable and innovative solutions. To that end, Enerjisa Müşteri Çözümleri A.Ş. was established in 2017 to manage Customer Solutions, our third business line next to Distribution and Retail.

Since October 2020, Enerjisa Enerji has been offering end-to-end solutions aimed at enhancing the energy efficiency and reducing the carbon emissions of its corporate customers, under the umbrella of "The Energy of My Business" (İşimin Enerjisi).

Enerjisa Customer Solutions Product Portfolio

Renewable Energy Solutions

- Solar Power Plants (SPP)
- Wind Power Plants (WPP)
- Energy Storage Solutions

Energy Efficiency Solutions

- Lighting Conversion Projects
- Process Efficiency Projects
- Cogeneration (CHP) and Trigenation (CCHP) Solutions

Green Energy Solutions

- International Renewable Energy Certificate (I-REC)
- Carbon Reduction Certificate

E-mobility

- Eşarj

Renewable Energy Solutions

Committed to assume an active role in the combat against climate change, Enerjisa Enerji offers reliable solutions that are tailored to specific customer requirements through innovative business and financial models in the field of solar power plants (SPP), where it deploys its financial and technical know-how. As of the end of 2024, total installed capacity of the solar power plants reached 102.4 MWp.

Energy Efficiency Solutions

Enerjisa Enerji develops customer-focused alternative energy efficiency solutions. The Company offers energy efficiency applications by the energy performance contract (ESCO/EPC) model, particularly in the fields of waste heat recovery, heating, ventilation and air conditioning (HVAC), pressurized systems, electric engines and lighting.

Green Energy Solutions

The concept of Green Energy refers to renewable energy sources such as solar, wind, and water, unlike fossil fuels such as coal, oil, and natural gas. Adopting an environmentally friendly approach for companies is of great importance to contribute to the stability of our planet and to remain competitive in the constantly changing global market.

Enerjisa Enerji's customers may reduce or neutralize their greenhouse gas emissions resulting from electricity consumption with two types of certificates. Enerjisa Enerji provides I-REC Certificates and Carbon Reduction Certificates to its customers under green energy solutions.

E-mobility: Eşarj

Enerjisa Enerji encourages widespread use of highly efficient electric vehicles in order to contribute to a low-carbon ecosystem. To that end, the company actively explores opportunities in innovative business areas such as electric vehicle charging stations, electricity storage systems, smart home technologies, and systems that help consumers generate their own electricity.

Enerjisa Enerji became the controlling shareholder of Eşarj Elektrikli Araçlar Şarj Sistemleri A.Ş. (Eşarj) by acquiring 80% of the shares of Eşarj in 2018. Through this acquisition, Enerjisa Enerji plays an innovative and pioneering



role in the electric vehicle ecosystem and is pivotal in the transformation of the sector, alongside its leadership in distribution and sales in the electricity sector. In December 2021, Enerjisa acquired an additional 14% minority stake in Eşarj to increase its stake from 80% to 94%, and in 2023, it fully acquired all remaining shares.

Eşarj operates Türkiye's first and fastest electric vehicle station network with 2,563 charging points at 1,508 public

locations across all 81 provinces of Türkiye by the end of 2024. Since July 2020, the Company has increased its contribution to reducing carbon emissions by certifying the electricity used for charging at all its public stations with the International Renewable Energy Certificates (I-REC) and the Renewable Energy Resource Guarantee System (YEK-G) Certificate obtained from domestic markets, in tandem with an expanding network.

ABOUT ENERJISA

“For a Better Future” platform is aiming to contribute to **the economic efficiency of Türkiye.**

A better future for everyone

Enerjisa Enerji continues to initiate investments and develop products that will facilitate the lives of its customers. The Company works diligently to create a greener and smarter world and a better future for more people across Türkiye with the projects it develops.

Enerjisa Enerji announced its “For a Better Future” platform in July 2023, aiming to contribute to the economic efficiency of Türkiye. The first solid outcome of the platform is the “Türkiye Productivity Survey Report,” which explores perceptions of businesses, acceptance, and practices related to productivity enhancement. The goal is to map Türkiye’s productivity landscape and pave the way for new initiatives. These efforts, guided by an Advisory Board comprising of experts, aim to provide insights into practical applications under the project.

Following the earthquakes that occurred on February 6, the Platform’s Advisory Board intensified efforts to address economic challenges in the regions that were heavily affected. Collaborating with UNDP Türkiye and regional Chambers of Commerce, Enerjisa Enerji partnered with the RRDC (Regional Reconstruction and Development Centres) project to rebuild and develop areas affected by the earthquake in 11 provinces.

RRDC efforts contributed to the recovery of a resilient, thriving region by providing individuals, communities and organizations in the earthquake zone with the information, tools and support they may need, and supporting them to overcome the economic hardship they face.

Within the scope of the project, Enerjisa Enerji provided financial support to 20 enterprises and cooperatives, enabling small businesses affected by the earthquake to create an economy and contribute to employment. In addition to the financial support provided to the enterprises, support for workspace, training, cooperation and access to financing was also provided, and efforts were made for the economic, social and cultural redevelopment and reconstruction of civil society by taking responsibility for preparing the region for a better future.

In March 2024, the Productivity Scorecard was launched. This study, carried out in cooperation with the Chambers and Commodity Exchanges of Türkiye, enables businesses to see their current productivity status and provides free online training opportunities for potential areas of improvement.

The Strategic Road Mapping Workshop, organized to create the platform’s roadmap for the future, was held in Ankara with the participation of the Advisory Board. The workshop identified strategic steps that will support Turkish businesses to develop their competencies, overcome the obstacles they face and use technology effectively. These steps will serve as a guide for the platform’s work over the next three years.

At the end of 2024, the first focus area of the platform was determined as “Data.” At the year-end meeting held with the participation of Advisory Board members, projects and solutions were presented to strengthen data-driven decision-making processes of businesses. Thus, an important step was taken to increase economic efficiency and spread the impact of the platform to wider areas.

The “For a Better Future” platform aligned with Enerjisa Enerji’s vision of contributing to a smarter and greener world, will continue to develop long-term projects along with its impact-focused sustainability approach.





PURPOSE, VISION, MISSION AND VALUES

PURPOSE

To connect people and industries to energy; and to provide a safer, cleaner and better energy future in Türkiye for generations to come.

VISION

Everyone should live in a sustainable energy world.

MISSION

To accelerate sustainable energy transformation by building the required infrastructure and services of tomorrow.



CAPITAL AND SHAREHOLDER STRUCTURE

Enerjisa Enerji sustains its operations and investments with the strength it derives from its prominent shareholders; E.ON and Sabancı Holding.



Being one of the largest electricity downstream companies in the world, E.ON focuses on two main business areas in Europe, namely distribution networks and customer solutions.

- 47.3 million customers, ~74,600 employees
- EUR 9.4 billion adjusted EBITDA, EUR 42 billion regulated asset base



Sabancı Holding is an investment holding company engaged in a wide variety of business activities through its subsidiaries and affiliates, mainly in the banking, financial services, energy and climate technologies, material technologies, mobility solutions and digital sectors. As of the end of 2024, Sabancı Group companies supply their products and services around the globe with more than 60 thousand employees in 17 countries worldwide.

Sabancı Holding's multinational business partners include leading global companies such as Ageas, Bridgestone, Carrefour, E.ON, Heidelberg Materials, and Skoda. As of year-end 2024, Sabancı Holding and its 11 listed subsidiaries' shares constitute around 6% of the total market capitalization of Borsa Istanbul.

Shareholder Name	Capital/Voting Right	
	December 31, 2024	
	(TL)	(%)
Hacı Ömer Sabancı Holding A.Ş.	472,427,587.56	40
E.ON International Participations N.V.	472,427,587.56	40
Other (Free Float)	236,213,792.00	20
TOTAL	1,181,068,967.12	100



INFORMATION ON STOCK

As of year-end 2024, Enerjisa Enerji had a market capitalization of TL 69.6 billion.

Enerjisa Enerji shares are traded under the “ENJSA” ticker symbol on Borsa Istanbul (BIST) Stock Market since February 8, 2018. ENJSA was included in FTSE All-World Index in June 2018; BIST Sustainability Index in October 2019; and BIST Corporate Governance Index in December 2019.

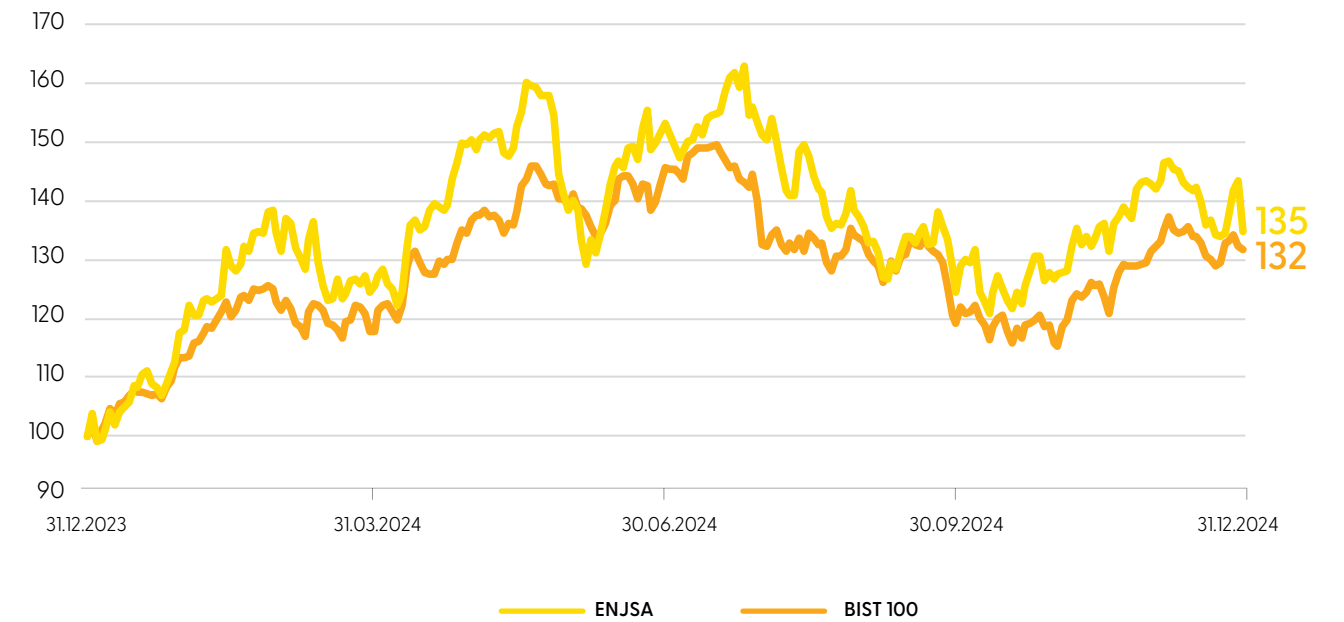
Stock Information

Stock Exchange	Borsa Istanbul
BIST Ticker	ENJSA
Bloomberg Ticker	ENJSA TI
IPO Date	08.02.2018
Nominal Value of Total Shares	TL 1,181,068,967.12
Free Float	20%
Market Capitalization (31.12.2024)	TL 69.6 billion
Year-End Closing Price (31.12.2024)	TL 58.9/Share

Enerjisa Enerji’s share price delivered a 35% nominal return in 2024. The average daily transaction volume during the year was TL 5.6 million in nominal terms. Additionally, our Board of Directors will propose a TL 2.87/share dividend payment during our 2024 Annual General Assembly.

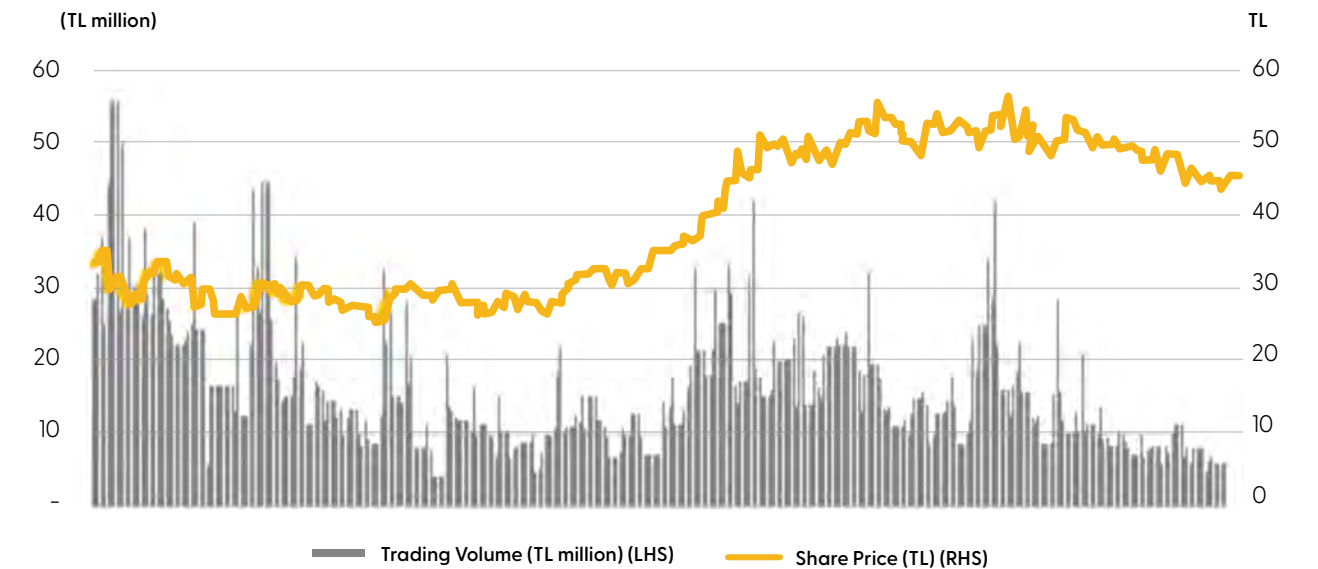
As of year-end 2024, Enerjisa Enerji had a market capitalization of TL 69.6 billion. Foreign investors’ share in the free float as of year-end 2024 was 21%, compared to 37% foreign ownership for BIST.

Relative Share Performance (%)



Share Price and Trading Volume

Date range: 01.01.2024-31.12.2024





AWARDS

In 2024, Enerjisa Enerji received many awards for its successful projects and expert team.

2024 AWARDS

TITAN BUSINESS AWARDS

Enerjisa Mobile Application - Gold Award in Business Website Category

BRANDON HALL - TECHNOLOGY EXCELLENCE AWARDS

Enerjisa Mobile Application - Bronze Award in Best Advance in Business Strategy and Technology Innovation Category

THE ONE AWARDS INTEGRATED MARKETING AWARDS

The Most Reputable Brand of the Year in the Energy Sector

FAST COMPANY TÜRKİYE

Sustainability Leaders 50 - Murat Pinar

ATD Best 2024 AWARDS

"Best Companies" List

AWARDS FOR ORGANIZATIONS THAT ADD VALUE TO SUSTAINABLE DEVELOPMENT GOALS

SENTRUM Project - Gold Award in the Social Investment Category
A Better Future Platform - Bronze Award in the Social Investment Category
A Better Future Platform - Collaboration Special Award

BEST EMPLOYERS 2023 - Kincentric

Türkiye's Best Workplaces Award

BLINDLOOK EYEBRAND AWARDS 2024

"Eye Brand" was selected.

BRANDVERSE AWARDS

SENTRUM Project - Bronze Award in the Sustainable City and Living Spaces Category

INTERNATIONAL ARCHITECTURE & DESIGN AWARDS 2024

Enerjisa Mobile Application - Innovation for Customer Value

GLOBEE AWARDS GOLD WINNER

Enerjisa Mobil Uygulama - Innovation for Customer Value

THE STEVIE AWARDS FOR SALES & CUSTOMER SERVICE

Enerjisa Mobile Application - Innovation in Customer Service

FAST COMPANY - BEST WORKPLACES FOR INNOVATORS 2024

FORTUNE 500 TÜRKİYE
2023 Survey - 13th Place

DATAEXPERT - BMI BUSINESS SCHOOL

The 50 Most Effective CHROs - Yakup Aydılek

BUSINESS LIFE

The 50 Most Effective CEOs - Murat Pinar
The 50 Most Influential CFOs - Dr. Philipp Ulbrich
The 50 Most Effective CHROs - Yakup Aydılek
50 Most Effective CCOs - Göktürk Demirel

BEST BUSINESS AWARDS

Green Excellence Award

STEVIE BEST EMPLOYERS AWARDS - 2 Gold Awards

Söğütözü Office

STEVIE INTERNATIONAL BUSINESS AWARDS

Söğütözü Customer Service Centre - Bronze Award

KAIZEN AWARD

Ayedaş

A.C.E (ACHIEVEMENT IN CUSTOMER EXCELLENCE) AWARD

Ayedaş

GARTNER EYE ON INNOVATION FOR POWER & UTILITIES

OPERA Digital Twin Project - 1 out of 128 projects in the EMEA Region.

THE HAMMERS AWARDS - 5 Awards

Karataş Sustainable Fishery Project - Golden Hammer for Best Team in Climate Crisis Category
I Protect My Energy Project - Golden Hammer in the Best Corporate Social Responsibility Management Team Category
SENTRUM Project - Bronze Hammer in the Best Team Supporting a Sustainable World Category
Söğütözü Customer Service Centre - Bronze Hammer in the Best Store Experience Team Category
February 6 Earthquake Communication Studies - Bronze Hammer in the Best Crisis Management and Risk Communication Team Category

CAPITAL BUSINESS WORLD'S FAVORITE COMPANIES

"The Most Admired Company in the Energy Sector."

STEVIE AWARDS 2024

A Better Future Platform - Bronze Award in the Corporate Social Responsibility Program of the Year Category

TEPE A.S. TRUST PARTNERS PROJECT

"Most Trusted Business Partner"

UIPATH AI25 AWARDS

RPA Doc. Understanding and E-Archive & E-Invoice Recording process won an award.

SABANCI 15TH GOLDEN COLLAR AWARDS

She-nergy Project - Sabancı of the New Generation Category

TITAN BUSINESS AWARDS - 3 Awards

Customer 360 Project - Gold Award in the Operations Management Solution Category
Gold Award in the Business Management Platform Category
Platinum Award in the Service Management Solution Category

FAST COMPANY CORPORATE STARTUP DAY 2024 - 2 Awards

Select AI Project - Best Intrapreneurship Award
Startup Friendly Institution Award

GLOBEE BUSINESS AWARDS

She-nergy Project - Gold Award for Achievement in Diversity and Inclusion

STEVIES FOR WOMEN IN BUSINESS

She-nergy Project - Bronze Award in the category of Achievement in the Development and Promotion of Women

FAST COMPANY - 50 MOST INNOVATIVE COMPANIES

FORTUNE TÜRKİYE

List of 50 Technology Leaders - Mehmet Fırat

PRIVATE SECTOR VOLUNTEERS ASSOCIATION - 17TH HEARTFELT AWARDS

Karataş Sustainable Fishery Project - Most Successful Volunteering Project Award in the Environment Category
SENTRUM Project - Award in the Most Effective Institutions Collaboration Category

LACP 2023 VISION AWARDS - ANNUAL REPORT COMPETITION - 5 Awards

Gold Award in the Energy Sector Category
Silver Award in the Most Creative Report Category
Technical Achievement Award
Ranked 17th out of 50 Reports in the EMEA Region and among the Top 20 Reports in Türkiye.

ISTANBUL MARKETING AWARDS 2024

Söğütözü Customer Service Centre | Energy Tunnel - Physical Customer Experience Award in the Product & Experience & Sales Category
Söğütözü Customer Service Centre | Energy Tunnel - Physical Customer Experience Award in the Product & Experience & Sales Category - Initiative for Climate Award in the Corporate Communications & Sustainability Category

Enerjisa Sports Clubs - Total 2 Cups, 118 Medals

MAY 19 COMMEMORATION OF ATATÜRK AND YOUTH SPORTS DAY INTERNATIONAL MASTERS LONG COURSE SWIMMING CHAMPIONSHIPS - YELLOW FINS SWIMMING TEAM
16 Gold, 43 Silver, 29 Bronze Medals

21ST AQUACHALLENGE SWIMMING CHAMPIONSHIPS - YELLOW FINS SWIMMING TEAM
1 Gold, 1 Silver Medal

YESEMEK ULTRA TRAIL - YELLOW THUNDERS RUNNING TEAM
1 Gold, 1 Silver Medal

5TH INTERNATIONAL ESKİŞEHİR HALF MARATHON - YELLOW THUNDERS RUNNING TEAM
3rd place in the Fastest and Most Crowded Companies Category

2ND RUNKARA INTERNATIONAL HALF MARATHON - YELLOW THUNDERS RUNNING TEAM
1st Place Cup in the Corporate Category

NOVEMBER 10 ATATÜRK REMEMBRANCE DAY INTERNATIONAL MASTERS SWIMMING CHAMPIONSHIPS - YELLOW FINS SWIMMING TEAM
3 Gold, 5 Silver, 18 Bronze Medals





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MESSAGE FROM THE CHAIRMAN OF THE BOARD

We aim to take even bigger steps in expanding our electricity grid and offering energy efficiency and e-mobility solutions to contribute to both Türkiye's energy transformation and global energy goals.

Dear Stakeholders,

As we present our 2024 Annual Report, it is my pleasure to share with you the achievements of our company during this period and our goals for the future. This report clearly reflects our commitment to sustainability, digitalization, and customer orientation. These three fundamental principles are the core values that shape the future of our company.

As Enerjisa Enerji, we have experienced a challenging year that has impacted our country, our sector, and our company. During this time, we not only reshaped our operations but also repeatedly demonstrated our responsibility as a critical infrastructure company.

The ongoing global climate crisis, geopolitical developments, and energy transformation, bring dynamics that directly affect our company. The increasing energy demand has made the need for energy infrastructure, renewable energy sources, and efficiency solutions even more critical. In this context, as Enerjisa Enerji, we continue to resolutely

pursue our mission of being a pioneer in the sector through the projects we undertake and the investments we make.

In this regard, we have not only strengthened our energy infrastructure but also reinforced our leadership in the sector through e-mobility, renewable energy, and efficiency solutions. Thanks to our investments in digitalization and innovation, we have increased our operational efficiency and continuously improved the customer experience. In this success, the greatest contribution comes from our most valuable resource, our human capital – the thousands of members of the Enerjisa family.

The year 2025 brings greater opportunities and goals for us in the energy sector transformation process. As highlighted in the Renewable Energy Roadmap for 2035 announced by the Ministry of Energy in the last quarter of 2024, an investment of approximately 28 billion dollars in transmission and distribution of Türkiye's energy systems is targeted by 2035. In this direction, Enerjisa Enerji will continue to accelerate

its investments for a more sustainable future. We aim to take even bigger steps in expanding our electricity grid and offering, energy efficiency, and e-mobility solutions to contribute to both Türkiye's energy transformation and global energy goals.

In the past year, the Board of Directors of Enerjisa Enerji fulfilled its duties and responsibilities within the scope of relevant regulations and procedures. During the Board of Directors meetings held in the 2024 fiscal year, financial and operational performance was reviewed, and necessary recommendations were shared with senior management. Agenda items communicated by the company management throughout the process were carefully discussed and decisions were made. The Board Committees regularly convened to review the work done in the fields of corporate governance, sustainability, risk, finance, and human resources. The recommendations from these committees were shared with the Board of Directors and considered by us.



As the Board of Directors, we congratulate the senior management, all committees, employees, and suppliers of Enerjisa Enerji for their successes in 2024. We will continue our efforts to build a greener, more efficient, and more sustainable world, strengthening our collaboration with stakeholders in the upcoming period.

We thank you, our valued stakeholders, for your trust in us and look forward to achieving great successes together in 2025.

Sincerely,

Kıvanç Zaimler
Chairman of the Board



BOARD OF DIRECTORS



Kıvanç Zaimler
Chairman

Kıvanç Zaimler studied at Istanbul Technical University and Berlin Technical University. From 1992 to 2008, he held various managerial positions in different fields in the private sector.

He joined Enerjisa in 2008 and held roles in natural gas trading and as General Manager of distribution and retail companies before becoming CEO. In 2018, he led Enerjisa's IPO, one of the largest in that period.

Since July 2018, Mr. Zaimler serves as President of the Energy Group at Sabancı Holding. He chairs the Board of Directors at Enerjisa Enerji and serves as Vice Chairman at Enerjisa Üretim. Additionally, he leads Sabancı Climate Technologies, established in June 2022 for Sabancı Holding's international energy and climate tech investments, and Sabancı Renewables, established in the USA. In addition to his duties in the energy business, Mr. Zaimler has held leadership roles in Sabancı Holding's technology ventures. He previously chaired SabancıDx, the global digital technology company, and currently serves as Vice Chairman.

Mr. Zaimler is also actively engaged with a number of nongovernmental organizations, serving as Vice President of World Energy Council Türkiye, Board Member at Sabancı University Istanbul International Energy and Climate Centre (IICEC), SHURA Energy Transition Centre Advisory Council Member, and Vice Chairman of the Board at Association of Electricity Distribution System Operators (ELDER), following his Chairman role at ELDER.



Attila Kiss
Vice Chairman

Attila Kiss received his degrees in economics in Szolnok and Budapest, Hungary, followed by a postgraduate Diploma in Management Studies at Chilterns University, UK. He holds qualification as Certified Accountant. He started his professional career in 1996 at OCE Hungaria in Budapest as management accountant.

In 1999, he joined the predecessor company of the E.ON Group, Bayernwerk Hungária, member of VIAG Group in Budapest. After holding various managerial positions, Attila joined E.ON Energie in Munich in 2006 holding responsibility for distribution business in CEE. Returning back to Budapest, Hungary, from 2010 he served as the Director of Energy Controlling followed by Managing Director of the customer service company of E.ON Hungaria Group. In 2015 he was appointed as Member of the Board of Directors of E.ON Hungaria responsible for power and gas distribution. Between 2018-2022 he acted as Chairman and CEO of E.ON Hungária.

Following this he moved to Germany, took over the group level SAP transformation for Enterprise Asset Management. Since January 2024, Attila Kiss serves as the Senior Vice President of Energy Networks Europe, responsible within the E.ON Group for power and gas distribution in Sweden, Poland, Slovakia, Czech, Hungary, Romania, Croatia and shareholder representative for E.ON in Türkiye.



Yeşim Özlale Önen
Board Member

Yeşim Özlale Önen earned her Bachelor's degree in Psychology from Middle East Technical University in 1997 and her Master's degree in Clinical Psychology in 1999.

She began her professional career as a Consultant at Davranış Bilimleri Enstitüsü in 1999 and continued her career as a Senior Consultant at Deloitte between 2003-2005. She served as a Project Manager at DDI Türkiye between 2005-2007.

Önen joined Sabancı Holding in 2007 as Group Human Resources Manager and worked at Sabancı Group until 2011. In 2011, she was appointed as the Senior Client Partner at Korn Ferry. As of 15 March 2023, Önen has been appointed as Human Capital & Sustainability Group President at Sabancı Holding and Board of Directors' Member for Enerjisa Enerji. She is also in the board of directors for Enerjisa Üretim and Kordsa.



Thorsten Lott
Board Member

Thorsten Lott received his degree in Business Administration at the Georg August University of Göttingen. He joined VEBA Group in 1999 as Business Controller for sales and trading activities in Hanover.

After the merger of VEBA and VIAG, Mr. Lott moved to the newly founded E.ON Energie AG in Munich, where he held different financial leadership positions in the areas of Risk Management, Controlling and Derivative Accounting. In 2007, Thorsten Lott joined E.ON Kernkraft in order to facilitate the development of international nuclear new build projects. After holding different financial leadership positions within the nuclear sphere, he assumed controlling responsibility for nuclear activities in E.ON Group (Germany and Sweden) as well as for all hydro generation activities (Sweden, Germany, Italy, Spain) through the newly founded E.ON Generation.

Mr. Lott was appointed as Head of Finance for all nuclear activities in 2015. Since 2017 he is Member of the Board (CFO) of PreussenElektra, which is responsible for the management of all remaining nuclear activities within E.ON Group.

BOARD OF DIRECTORS



Orhun Köstem
Board Member

Orhun Köstem joined Anadolu Group in 1994, where he held several management roles until 2008. He was appointed as the CFO of Efes Breweries International in 2008. A year later, in 2009, he transitioned to the role of Corporate Finance Coordinator within the Anadolu Group.

From 2010 to 2018, Mr. Köstem furthered his career at Coca-Cola İçecek, serving as the CFO between 2010 and 2016 and then as the Regional Director for the Middle East and Pakistan. He was the CFO of Anadolu Efes between 2019 and 2021.

Since July 1, 2021, Mr. Köstem has been the Group CFO of Sabancı Holding. In addition to his primary role, he holds significant positions across various organizations: Chairman of CarrefourSA, Vice Chairman of Sabancı İklim Teknolojileri, Board of Trustees of Sabancı University, and Member of the Board of Directors at Akbank, Kordsa, Enerjisa Enerji, and Enerjisa Üretim.

He was one of the co-authors of the book "Opening the Window to Capital Markets: From A to Z Initial Public Offerings and Investor Relations," published in 2009. His expertise has been recognized for many years by various national and international platforms; while listing among "Türkiye's Most Influential 50 CFOs" by BMI Business School and DataExpert in 2016, 2019, 2020, and 2021, he also received accolades as Türkiye's Best CFO in Thomson Reuters Extel's Investor Relations Awards in 2011 and 2013, and was named "Best CFO" in the Consumer Sector in Emerging EMEA by Institutional Investor (II) in 2020. He was also distinguished by the Best CFO among industrials in the Emerging EMEA region for three consecutive years from 2022 to 2024 by II (renamed as Extel as of 2024). In addition, he was recognised as Best CFO among BIST30 companies by Turkish IR Society (TUYİD) in 2022 and 2023.

Mr. Köstem, featured in the C-Suite Series – Fortune CFO 2022 list, is a member of the CFA Society Istanbul and the CFO Network of the World Business Council for Sustainable Development (WBCSD), reflecting his commitment to excellence in finance and sustainable development.

In 1991, Orhun Köstem completed his undergraduate studies in Mechanical Engineering at Middle East Technical University (METU), where he also obtained his MBA. Furthering his education, he acquired a master's degree in Finance and Corporate Law from Bilgi University.



Guntram Würzburg
Board Member

Guntram Würzburg studied Law at University of Göttingen. He holds a PhD in Law and took part in several Executive Programs of Harvard Business School and MIT, Boston.

He started his career with PreussenElektra AG, Hannover as an in-house counsel for Energy, Antitrust and Corporate Law. He joined the Legal Department of E.ON AG in 2001 and held several positions as General Counsel in different E.ON group companies thereafter. In 2003, he worked in the US as in-house counsel for Regulatory Affairs at LG&E. From 2004 to 2006 he changed to the real-estate business for German based Vitera (today's Vonovia) as Head of Legal and HR Director, before he then took over as General Counsel and later HR Director for E.ON Ruhrgas AG. This role he continued for the successor companies E.ON Energy Trading SE and E.ON Global Commodities SE until December 2013. He became the Head of Corporate Audit for the E.ON Group in 2014. From January 2017 until July 2022 he served as General Counsel and Chief Compliance Officer with E.ON SE.

Guntram Würzburg took over as CEO of E.ON Hungária in July 2022. He is also a member of the Board of Directors at Enerjisa Enerji and Enerjisa Üretim, two of the leading energy companies of Türkiye. He derives the energy and motivation needed for everyday challenges from his family, skiing and listening to jazz music.



Kamuran Uçar
Independent Board Member

Upon graduating from Middle East Technical University with a Master's degree in Chemical Engineering in 1996, Ms. Uçar started her career at TÜBİTAK Defence Industries Research and Development.

Ms. Uçar subsequently embarked on a career at Unilever in 1999, where she served consecutively as Product Manager for Omo; and as Vice President of Household Cleaning and Laundry Products divisions responsible for Africa, the Middle East and Türkiye, while also leading the divisions' teams in South Africa, Türkiye and Dubai. During this period, she also served as Board Member for Unilever Global Home Care business. Between 2016 and 2018, Ms. Uçar continued to serve as Vice President in Household and Personal Care at Unilever for Türkiye, Russia, the Middle East, North Africa, Central Asia and the Caucasus regions, in addition to being Board Member at Unilever Türkiye. During this period, she took part in Global Executive Projects in the Sustainability and Diversity Development Group of the Company. In 2019, she was appointed General Manager of the Unilever Iran, Caucasus and Central Asia Region, and continued her duty as Board Member for Unilever Türkiye, Iran, Caucasus, and Central Asia.

As of January 2022, Kamuran Uçar left her position at Unilever in order to start her own business in the field of healthcare and sustainability technologies. Ms. Uçar currently serves as Founder & CEO of her own company. She is also Member of the Advisory Board of the Advertisers Association, Arya Women Investors Group, Dream Partner of Young Guru Academy, a non-governmental organization; she also works as an Investor and Mentor in various start-ups.



Mehtap Anık Zorbozan
Independent Board Member

Mehtap Anık Zorbozan completed the AFS exchange program in California in 1988 and later graduated from the Department of Industrial Engineering at Istanbul Technical University. She began her career in 1992 as Management Trainee at Borusan Holding A.Ş.

After serving at managerial positions in various companies within the Borusan Group and undertaking numerous projects at the group level in production, distribution, and logistics companies, she was appointed Assistant General Manager of Finance at Borusan Holding in 2006. Concurrently, she also held the position of Assistant General Manager of Finance at Borusan Investment, a publicly traded company. During this period, she served on the Board of Directors of various companies within the group.

She was involved in the joint venture and establishment of Borusan EnBW Energy, a company formed between Borusan Holding and the German energy company EnBW AG, and later served as Assistant General Manager responsible for Finance, Legal, and Procurement there. She held this position from 2009 until 2017. In 2017, she was appointed as the Member of the Executive Board responsible for Finance at Borusan Mannesmann Boru, a subsidiary of Borusan Holding and the German steel giant Mannesmann Salzgitter, another publicly traded company within the group. In addition to overseeing the finance departments at the industrial company, she also assumed responsibilities for Foreign Trade, Management Information Systems, Legal Affairs, and International Trade. During the same period, she served on the Board of Directors of subsidiary production facilities in the United States and Italy, as well as various companies established for commercial purposes in Europe. She retired from her position at the end of 2021. She has been a member of Enerjisa Enerji Board of Directors since April 2024.

BOARD OF DIRECTORS COMMITTEES



Chairperson
Kamuran Uçar
Independent Board Member

Members
Guntram Würzburg
Board Member

Yeşim Özlale Önen
Board Member

Harun Turan
Not Board Member

Activities of the Corporate Governance Committee are discussed in the Corporate Governance Section.

[Corporate Governance Committee Charter](#)



Chairperson
Mehtap Anık Zorbozan
Independent Board Member

Member
Kamuran Uçar
Independent Board Member

Activities of the Audit Committee are discussed in the Corporate Governance Section.

[Audit Committee Charter](#)



Chairperson
Mehtap Anık Zorbozan
Independent Board Member

Members
Kamuran Uçar
Independent Board Member

Nusret Orhun Köstem
Board Member

Thorsten Lott
Board Member

Activities of the Early Risk Detection Committee are discussed in the Corporate Governance Section.

[Early Risk Detection Committee Charter](#)

EXECUTIVE MANAGEMENT



Murat Pinar
CEO

Murat Pinar, having graduated from Karadeniz Technical University as an Electrician and Electronics Engineer and holds an MBA degree from London School of Commerce & University of Wales.

He started his professional career in Siemens where he worked as transmission engineer, transmission product manager and application and integration manager during the years 1998-2006. Later, he undertook the task management responsibility for the field operations and Program Director roles at Nokia Siemens Networks Company in 13 different countries including Eastern Europe, Central Asia and Türkiye, Azerbaijan and Georgia. Murat Pinar, joined Enerjisa in 2015 and undertook different executive positions within Enerjisa Distribution Companies. He led the integration, growth and development phases of Enerjisa Distribution Companies especially leading operational excellence, business development and investment processes through contributing to restructuring of the market dynamics.

Mr. Pinar was appointed as the General Manager of Enerjisa Distribution Companies in 2015 and as the President of Enerjisa Enerji Distribution Business Unit in 2016. He serves as the Enerjisa Enerji CEO since November 1, 2019. Mr. Pinar also serves as Board Member of ELDER (Association of Electricity Distribution Companies), Board Member of Eşarj, Chairman of E-MOD (The Association of Emobility Operators) and Chairman of EUROGIA.



Philipp Ulbrich
CFO

Philipp Ulbrich holds a Master's degree in Business Administration and a PhD in Accounting / Controlling from Eichstätt-Ingolstadt University, Germany.

He worked for E.ON since 2006 in various international positions, amongst them as Head of Finance for the French activities between 2009 and 2013, as Head of the Global Venture team between 2016 and 2019 and as program leader for the group-wide Working Capital Optimization (2014 to 2015) and the ERP-transformation to S4HANA between late 2019 and early 2021.

In his most recent position before joining Enerjisa Enerji as CFO in June 2023, he was responsible for Finance across E.ON's Digital activities for two years.

EXECUTIVE MANAGEMENT



Ersin Esentürk
General Manager of
Retail Sales Companies

Ersin Esentürk completed his bachelor's degree in Metallurgical and Materials Engineering at Middle East Technical University and his master's degree in Business Administration at Indiana University of Pennsylvania.

Since 2020, Ersin Esentürk has been serving as the General Manager of Enerjisa Retail Sales Companies. Starting his career in 2000 at Dışbank, he held various roles in sales and business development at Toyota Turkey Marketing and Sales Inc. and General Motors - Opel. Joining Enerjisa in 2009, he played a significant role in leading sales functions in individual and corporate channels, contributing to customer experience and energy industry development in the retail business unit. Managing an electricity sales operation reaching 9 million customers in 14 provinces within Enerjisa, he also played a crucial role in the establishment and sustainability of investments in renewable energy and energy efficiency.

Mr. Esentürk is a board member of the Women in Technology Association, contributing to sustainable development by ensuring equal opportunities in science and technology. He leads important projects contributing to sustainable development and equal opportunities.



Oğuzhan Özsürekcı
General Manager of
Distribution Companies

Oğuzhan Özsürekcı completed his undergraduate degree in Electrical and Electronics Engineering at Middle East Technical University and obtained his master's degree in Electrical and Electronics Engineering at Gazi University. He started his career at Barmek Holding in 2002. In 2003, then he joined Başkent Electricity Distribution Inc. as an engineer. Between the years 2003-2013, he held various managerial positions at Başkent Electricity Distribution Inc. In the years 2013-2019, he successfully served as the Director of Customer Operations and Director of Field Operations and since November 2019, he has been serving as the Group Director of Field Operations at Enerjisa Distribution Companies. Following his role as the General Manager of Distribution Companies at Enerjisa since 2022, he leads the Distribution team that aims to provide quality and continuous energy to more than 22 million people in 14 different cities.



Ebru Taşcıoğlu
Head of Sustainability and
Corporate Capabilities

Ebru Taşcıoğlu completed her undergraduate education at the Faculty of Educational Sciences, Ankara University. Between 1999 and 2010, she held various human resources positions in different fields in the private sector. Taşcıoğlu joined Enerjisa in 2010, where she held managerial roles in labour relations and human resources in Enerjisa Distribution and Enerjisa Retail Sales Companies. Before assuming her current role, she served as the Director of Human Resources and Administrative Affairs at Enerjisa Retail and Enerjisa Distribution Companies. Since September 2021, she has continued her work as the Head of the Sustainability and Corporate Competencies Department, overseeing sustainability, communication, customer relations, occupational health, safety, environmental activities, and reporting. She has completed the INSEAD Diversity Program and the Yale School of Management's Board Program for Women. In 2024, she also completed the "Inclusive Leadership Training Program for Sustainable Companies," organized by the Percent 30 Club, hosted by Sabancı University Corporate Governance Forum in collaboration with the International Finance Corporation (IFC). Since 2022, she has served as the Chair of Enerjisa's Sustainability Executive Committee and the Diversity, Equity, and Inclusion Committee and is responsible for Diversity and Inclusion at Enerjisa. Taşcıoğlu represents Enerjisa in the "Percent 30 Club," an initiative working to increase the proportion of female employees on company boards.



Mehmet Fırat
Head of IT and Digital Business
Management

Mehmet Fırat, who graduated from METU-Mathematics department in 2001, completed the postgraduate program in Information Systems Management in the UK in 2002. In 2019, he completed the Artificial Intelligence Program at Oxford University and in 2023, he completed the Chief Digital Officer Program at Northwestern University.

Starting his career at Havelan, Fırat worked as a consultant, project manager, and program manager in SAP projects. In 2009, he started working as a Project Manager at Başkent Electricity Distribution Company. After working as the Group Manager of the Project Management Office and the Director of Information Technologies at Enerjisa, he has been serving as the Head of Information Technologies and Digital Business Management for the past 5 years.

In addition to his current executive roles, he is also active in management boards. He serves as the Vice Chairman of the Board of Directors of Zack AI, a Sabancı subsidiary working on artificial intelligence, and he is a board member of Eşarj, a leading company in electric vehicle charging stations.

In addition, he has active roles in associations in technology and energy areas. He is the Founding Member and Energy Work Group Chairman at the Artificial Intelligence and Technology Association (YZTD), works as board member in Energy Digitalization Association (EDIDER) and he is the member of Blockchain Türkiye.



Yakup Aydilek
Head of People & Culture

Yakup Aydilek graduated from the Business Administration Department at METU (Middle East Technical University) in 2005 and completed his master's degree at Pantheon-Sorbonne University in 2024. Aydilek started his career at Deloitte in 2005, where he worked as a Senior Auditor from 2005 to 2009 and as a Financial Controller at CAF from 2009 to 2010. In 2010, Yakup Aydilek joined the Enerjisa Enerji family, where he played a role in critical projects such as the privatization processes of Enerjisa Enerji, the acquisition of new electricity distribution regions, system transitions, and operational excellence efforts. Spending 14 out of his 19 years of professional life at Enerjisa Enerji Aydilek has taken on leadership roles in various functions and teams within the Retail business unit. Since 2021, he has been serving as the Head of the Human and Culture Department. Aydilek is a Board Member of GYİAD (Young Managers and Business People Association), where he co-chairs the Digital Working Group and works on pioneering policies and strategies for the development of the industry and society. He is also a Member of the Audit Board of the YenidenBiz Association, where, as the Head of the Technology Committee, he actively supports the reemployment of women who have taken a break from their careers, promoting diversity, flexibility, and efficiency in the workplace. Additionally, in 2024, he completed the "Inclusive Leadership Training Program for Sustainable Companies," organized by the Percent 30 Club, hosted by Sabancı University Corporate Governance Forum in collaboration with the International Finance Corporation (IFC).

**Top Row Left to Right:**

Ersin Esentürk (General Manager of Retail Sales Companies)

Yakup Aydilek (Head of People and Culture)

Mehmet Fırat (Head of IT and Digital Business Management)

Oğuzhan Özsürekcı (General Manager of Distribution Companies)

Bottom Row Left to Right:

Murat Pınar (CEO)

Ebru Taşcıoğlu (Head of Sustainability and Corporate Capabilities)

Philipp Ulbrich (CFO)



MESSAGE FROM THE CEO

With the “For A Better Future” platform that we are realizing together with our stakeholders, we are working together with a focus on efficiency for a sustainable, egalitarian, smart and green world.

For Enerjisa Enerji, 2024 was a year full of significant achievements in line with our mission to lead the energy transformation in Türkiye. We have been able to take strong steps towards the future of a sustainable energy world while strengthening our businesses and operations.

In our electricity distribution and retail sales business, we continue to set the standards in the sector as we provide electricity to more than 22 million people in three distribution regions covering 14 cities of our country. Thanks to our investments into the electricity grid, we ensured uninterrupted energy supply and network quality, adhering to our responsibility to operate Türkiye's most critical infrastructure. While meeting our financial targets for 2024, we have delivered on our commitment to sustainability. Setting current industry trends allowed us to prepare our networks for a safe transition to the future energy world.

We also continued with our efforts to be a strong partner for our electricity customers throughout our supply areas as well as for all eligible customers in the entire country. Our main target here was to ensure a stable supply while coping with the imbalances in the market. We strongly believe that from 2025 onwards this imbalance will start to be removed step by step to allow for a commercially appropriate market system.

By successfully managing all global and regional dynamics, we achieved a year-over-year increase in the Operational Earnings, outpacing inflation. This success is the result of focusing on operational excellence in all our divisions. We have continuously optimized business processes and increased customer experience amongst all our services that we provide.

At Enerjisa Enerji, we put people and culture at the centre of our transformation. Accordingly, in 2024, we took important steps on our way to the Enerjisa 2030 vision- that will improve how we do business and operating a corporate culture that matches the requirements of the future. In this journey, we proceed with an approach that unlocks the potential of our employees and integrate their contributions with our strategic goals. Our updated 2030 strategy is not only limited to finding solutions to the current macroeconomic challenges, but also supports the realization of the strategies of each of our business units by uniting around a common vision of Enerjisa's future.

All of our actions and programs are closely connected with our overarching goal of a sustainable future. With our “For A Better Future” platform, which we have implemented together with our stakeholders, we are working together with a focus on efficiency for a sustainable, equal, smart, and green world. Within the scope of its

activities in 2024, we took part as the only private stakeholder in the RRDC (Regional Reconstruction and Development Centres) project, which was implemented in cooperation with UNDP (United Nations Development Programme), Needs Map and Adana and Gaziantep Chambers of Commerce to support economic and social development and rebuild communities in earthquake-affected regions. As Enerjisa Enerji, we provided financial support to 20 enterprises and cooperations within the scope of the project. We provided financing, enabling small businesses, that have been affected by the earthquake, to continue their business and support to increase employment rates back to normal levels. In cooperation with the Chambers and Commodity Exchanges of Türkiye, we launched the Efficiency Scorecard application, enabling businesses to see their current productivity status and offering free online training opportunities for potential areas of improvement. At the end of 2024, we finalized the first focus area of the platform responsible for 'Data' and took important steps to increase economic efficiency. That will strengthen the data-based decision-making processes of businesses that are part of the scorecard application.



MESSAGE FROM THE CEO

We continue to expand the use of digital technologies that play a major role in the transformation of our sector.

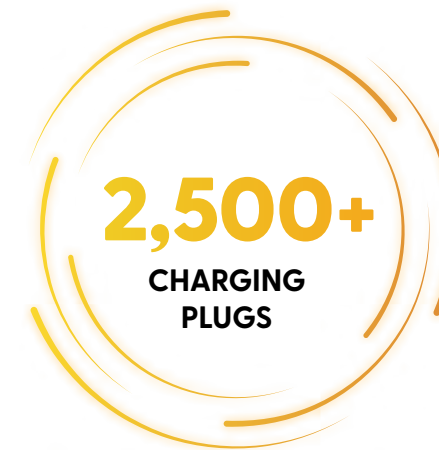
‘Sustainable Energy Based Tourism Application Centre (SENTRUM)’ is an exemplary model for sustainable tourism. With the project, we launched the historic Birgi Village of Izmir as the second centre of the green destination model, supporting local development and harmonizing energy efficiency and renewable energy practices with the natural and cultural values of the region. Birgi is not only a focal point for regional development, but also a symbol of our sustainability vision. In this context, we are working with the United Nations Development Programme and other business partners to strengthen our responsibility to society, aiming to expand tourism to all four seasons and personalize visitors’ experiences.

One of the most important trends that will shape the near future of the energy sector remains digitalization, with an increasing focus on the opportunities arising from artificial intelligence. We continue to expand the use of digital

technologies that play a major role in the transformation of our sector. With our in-house digital competencies program, we support our employees in the areas of robotic process automation, data visualization and reporting. We have built our artificial intelligence strategy on increasing the efficiency of operations in our company and diversifying and transforming our capabilities in our processes and services. In addition, we have implemented our first AI-manifesto in order to make artificial intelligence service approach based on our ethical, reliable and responsible principles while implementing respective applications. In order to ensure operational excellence and business continuity, we closely monitor current technologies and applications in our information technology infrastructure and make the necessary investments to develop innovative solutions. While implementing new technologies into our systems, we take the necessary measures to prevent

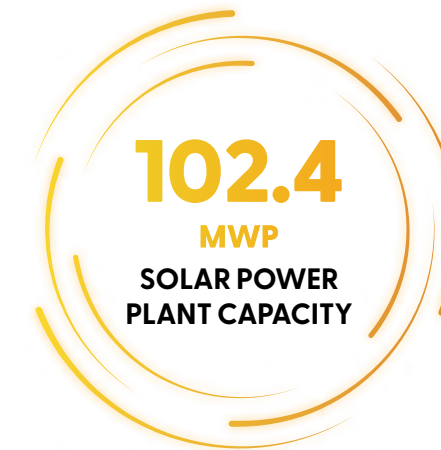
possible risks that may occur in our critical technology infrastructure. We work together to successfully realize all these processes and become a leader in our sector.

At Enerjisa Enerji, we are taking decisive steps forward with the strategic priorities we have identified in order to maintain our leading position in the energy sector and pioneer the energy needs of the future. Firstly, we increase our investments in our regulated asset base, seize growth opportunities and expand our network in our distribution regions. This not only enables us to provide higher quality service to our existing customers, but also contributes to our sustainable growth targets by expanding the scope of our operations. One of our strategic priorities is to facilitate a secure energy transition and to operate a resilient infrastructure ready for the expansion of renewable energy sources and the rise of e-mobility solutions. In this context, we are already realizing energy networks that can



respond to the needs of tomorrow where we see changing demand patterns evolving from an increasing number of electric cars connected to our networks.

By expanding our e-mobility services, we not only build sustainable mobility infrastructure, but also contribute to the economy by reducing energy imports. By expanding our e-mobility services with our Eşarj subsidiary, we continue to be a leader in sustainable transport infrastructure with over 2,500 charging plugs in 81 provinces of Türkiye. In Enerjisa Enerji Customer Solutions, we continued to offer a sustainable growth model with energy performance contracts (EPSs). We increased the capacity of the solar power plant (SPP) projects by 3.5 times more compared to the previous year, and reached a total installed capacity of 102.4 MWp by the end of 2024. Within the scope of our energy



efficiency solutions, we have realized the potential to save approximately 80,000 MWh of annual energy demand through more than 50 projects. With all these services, we continue to lead the energy transformation for a better future in Türkiye.

Our strategic priorities shape both the present and the future of the energy sector and as Enerjisa Enerji, we will continue to pioneer its transformation. I would like to thank all our stakeholders and employees for their support in building the energy world of the future together.

Murat Pınar
Enerjisa Enerji
CEO



MESSAGE FROM THE CFO

Despite navigating the challenges of a high-inflationary environment, we effectively maintained our investment momentum reaching a total of TL 15 billion in 2024.

Dear shareholders,

The first full fiscal year being the CFO of Enerjisa Enerji is now completed. Reflecting on this time, the company again navigated in an incredibly challenging economic landscape. The macroeconomic circumstances in Türkiye and ongoing global uncertainties in 2024 dominated not only the broader economic performance in the country but also the energy sector specifically. Enerjisa Enerji's position as the leader of the energy transition once again remained of utmost importance. While our electricity networks provide secure energy access to millions of households and businesses, we continue to be a reliable business partner in Türkiye's energy transformation with the products and solutions we offer. As Enerjisa Enerji, we have not only played a pioneering role in Türkiye's energy transformation with the infrastructure investments we have realized, but we have also continued to ensure reliable access to electricity for our country and our people.

Beyond ensuring operational excellence during these turbulent times, we pursued opportunities to strengthen our existing businesses while venturing into new areas of growth. Our commitment to create value for our customers and for our shareholders has been pivotal in sustaining our profitability. In that respect, 2024 has also been a year of transition for us. The application of inflation accounting standards placed particular pressure on different areas of the company. However, despite the uncertainties, we proved to be successful not only operationally but also in fulfilling our financial promises. Our efforts included providing greater transparency into both our business model and our financial performance, fostering a deeper understanding and increased interest amongst the investor community. That helped us both to remain an attractive story at the stock market and to be a valuable partner for national and international lenders.

Despite navigating the challenges of a high-inflationary environment, we effectively maintained our investment momentum reaching a total of TL 15 billion in 2024. We manage investments in our distribution business with full discretion in order to take the dynamic macro environment into account and generate the best possible value for our shareholders and partners. That is why we fully exploited the flexibility in our Distribution business to increase our investment level in 2023 to the maximum and brought it back to a regular level in 2024. However, in the long term we target to increase our investments on an annual basis to seize the opportunities of growth driven by the energy transition. Not only upcoming modernization measures in the grid, but also the connection of additional capacities in the renewables sector and from additional customer connections will remain the drivers of a growing asset base. With our past investments and the high inflationary



adjustment our Regulated Asset Base has achieved a remarkable level of TL 59 billion by end of 2024. As we are growing the assets above inflation, also our Operational Earnings have been benefitting from that growth leading to a level of TL 41.2 billion in 2024 respectively.

2024 was challenging for our Retail business as well, due to volatile market conditions and regulatory changes. Insufficient tariff increases had a significant impact on maintaining a sustainable financial balance. A transparent and balanced regulatory framework will ensure uninterrupted and quality access to energy. In the new tariff period starting from 2026, we expect regulatory steps and incentive mechanisms to be shaped in harmony with the industry to accelerate Türkiye's energy transformation and strengthen grid investments and retail operations. As Enerjisa Enerji, we will continue to fulfil our responsibility to ensure the sustainability of our country's energy infrastructure and provide the best service to our customers.



MESSAGE FROM THE CFO

We will stay **focused on** providing reliable energy distribution, growing our retail sales, and **offering sustainable energy solutions.**

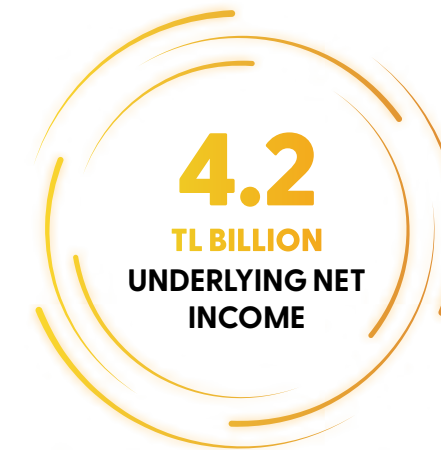
I am extremely pleased with our performance despite these difficult market conditions. We managed to fully meet the targets we set at the beginning of the year. We have consistently demonstrated that a resilient business model, such as the one we operate, was and will remain the pillar to be the best partner for serving 22 million people and also for delivering value to our shareholders.

From a CFO's perspective, securing unrestricted access to affordable and flexible financing will continue to be a critical challenge in 2025. The sustainability of future investment plans is heavily reliant on the availability of domestic and international capital at competitive rates. The continuation of supportive financial policies and a gradual relaxation of financing

constraints for corporations are important factors in that respect. If interest rates will continue to decrease over the year, we see good chances that our underlying earnings will benefit from that trend, as 2024 was heavily impacted by a continuation of high interest expenses. Only in 2024 we were required to finance TL 23 bn for our heavy investment program and the need to re-finance our existing debt.

This especially impacted bottom line earnings and will only gradually reverse from this year onwards. Though, by applying our attractive dividend policy to pay out at least 80% of our Underlying Net Income, we will be able to deliver a slight increase of the dividend. According to the results of the business year 2024 we are proposing a dividend per share to the General Assembly of TL 2.87.

For 2025, we remain dedicated to supporting Türkiye's energy transition through increased investments aimed at fostering a sustainable future. For 2025 that means we are targeting investments in a range of TL 21 - 24 bn. Despite navigating a highly dynamic macro environment, our focus remains on achieving intensified profitable growth across all business areas, exceeding inflation and staying aligned with our long-term guidance. Short term we will also grow our earnings as we target for Operational Earnings of TL 52 to 57 bn and Underlying Net Income in a range of TL 5 to 6 bn. Especially, as our Underlying Net Income is the basis for paying out dividends, investors can expect a growing dividend for fiscal year 2025 as well.



Guided by our strategic priorities, we will stay focused on providing reliable energy distribution, growing our retail sales, and offering sustainable energy solutions. At the same time, we aim to improve our working culture, reduce operational costs, and make scalable, profitable investments. With the support of our Board of Directors and stakeholders, our management team is dedicated to ensuring sustainable and profitable growth for the future.

At the heart of our success lies the strength of our exceptional human resources and cutting-edge technological capabilities. With over 10,000 devoted team members and an unwavering focus on digital transformation, we are well-prepared

to navigate the complexities of the energy landscape with resilience and adaptability.

As we look ahead, I want to express my deepest gratitude to our shareholders, customers, business partners, and colleagues for their enduring trust and dedication. Being part of this extraordinary team is a privilege, and I am truly inspired by the opportunity to contribute to our shared journey towards a brighter, more sustainable future.

Dr. Philipp Ulbrich
Enerjisa Enerji
CFO



Strategy

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TURKISH ELECTRICITY MARKET

59%

THE SHARE OF POWER PLANTS GENERATING ELECTRICITY FROM RENEWABLE ENERGY SOURCES WITHIN INSTALLED CAPACITY

In Türkiye, total installed electricity capacity increased from 64 GW in 2013 to 116 GW in 2024 with the implementation of effective regulations and new legislation.

GENERATION CAPACITY

The Turkish electricity market underwent major changes over the past 23 years, leading to generated substantial growth in the field. Total installed electricity capacity increased from 64 GW in 2013 to 116.0 in 2024 on the back of developments that include the introduction of renewable technologies, liberalization of markets and privatization, in tandem with the implementation of effective regulations and new legislation. This increase in total installed capacity also paved the way for rapid growth in other industries, becoming one of the important drivers of Türkiye's strong GDP performance over the past 23 years.

RENEWABLE ENERGY INSTALLED CAPACITY

Türkiye is undergoing a successful energy transformation process, one that upholds supply security in electricity generation and a reduction of foreign dependency as its main goals. In line with the country's energy policies, the growth recorded in installed capacity continued in 2024.

In 2024, approximately 0.3 GW of hydroelectric power, 0.8 GW of wind power plants and 3.9 GW of solar power plants were commissioned.

The share of power plants generating electricity from renewable energy sources within installed capacity increased from 33% in 2005 to 59% in 2024.

The Renewable Energy Support Mechanism (YEKDEM/FIT) and Renewable Energy Resource Area (YEKA) models—which played a significant role in the increase of Türkiye's renewable energy capacity and contributed to the growth of the share of renewable energy power plants in Türkiye's total installed capacity—continues to be implemented.

SUPPLY & DEMAND BALANCE AND PROCUREMENT COSTS

The total gross electricity demand in Türkiye in 2024 was 349 TWh. In 2024, there is a growth in residential and commercial demand that is positively different from the long-term average.

In 2024, the fact that Europe has experienced a colder winter compared to 2023, fluctuations in gas occupancy rates and wind generation have had an impact on gas prices. The end of

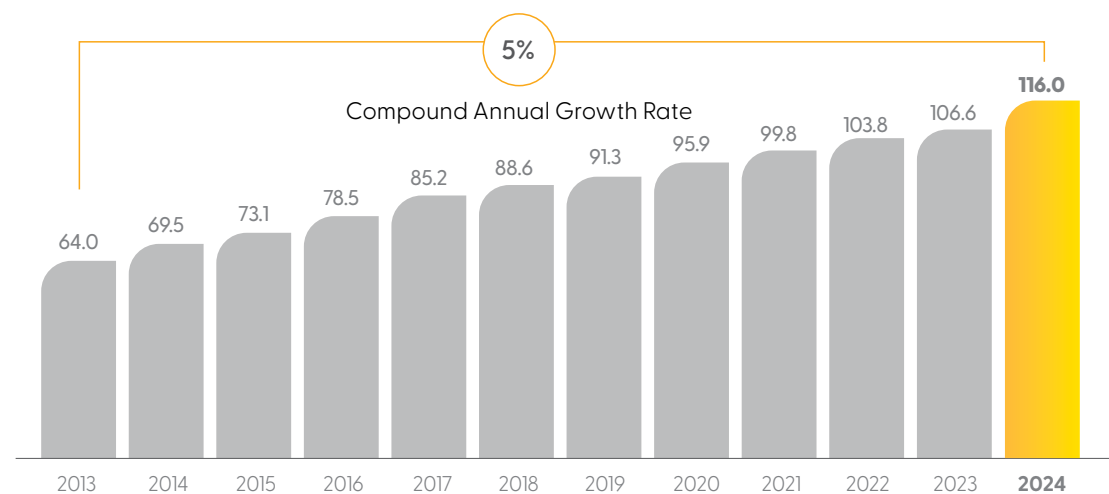
the Russian gas agreement transferred through Ukraine at the end of 2024 and the uncertainty of the new agreement terms keep the issue of supply security on the agenda for Europe. Due to the tensions in the Middle East and the political problems experienced, anxiety has dominated the energy markets throughout the year.

Compared to the previous year, the indicative natural gas price (ICE-TTF) decreased by 18% and the coal price (ICE-API2) decreased by 13% in 2024.

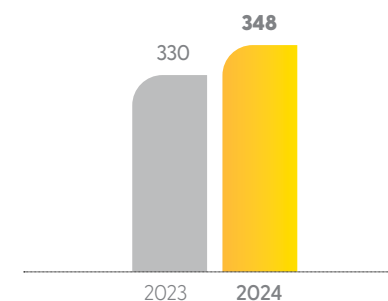
The Market Clearing Price (PTF) increased by 2% compared to 2023 and became an average of 2,236 TL/MWh for 2024.

The maximum price limit of the Day-Ahead Market and Balancing Power Market was 2,700 TL/MWh in the first half of the year. The maximum price limit, which was updated as 3,000 TL/MWh in July, remained unchanged until the end of the year.

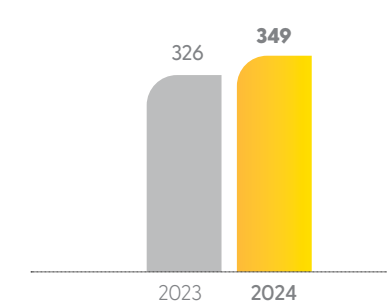
Total Installed Electricity Generation Capacity (GW)



Gross Electricity Demand (TWh)



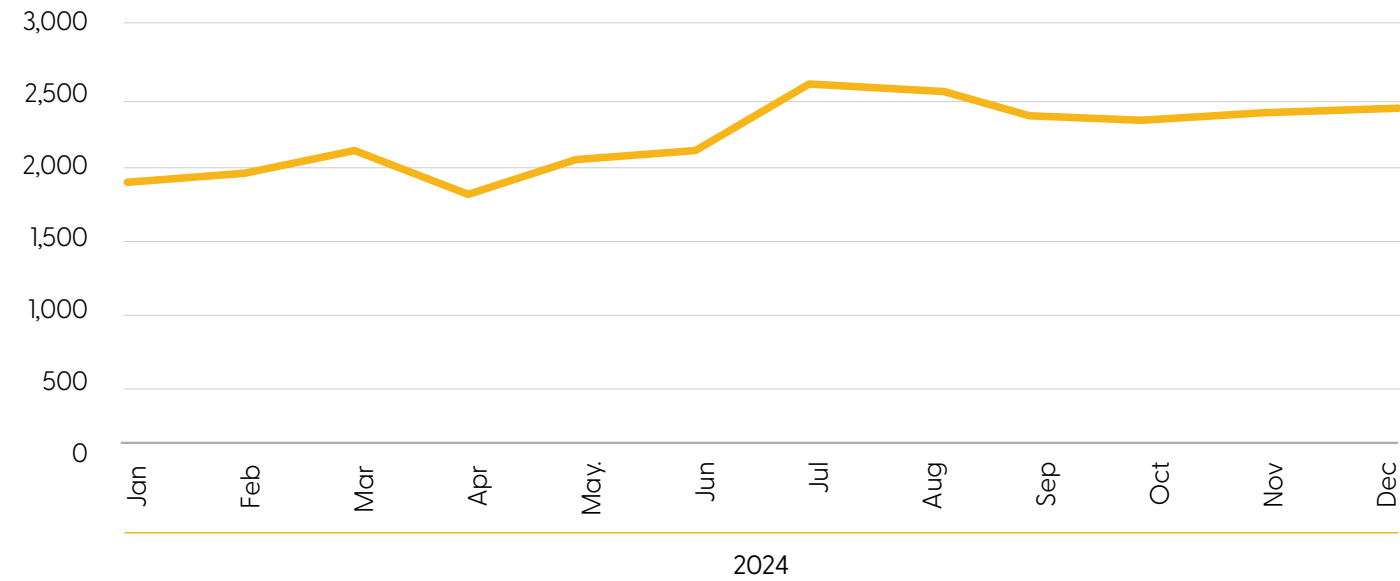
Gross Electricity Generation (TWh)



TURKISH ELECTRICITY MARKET

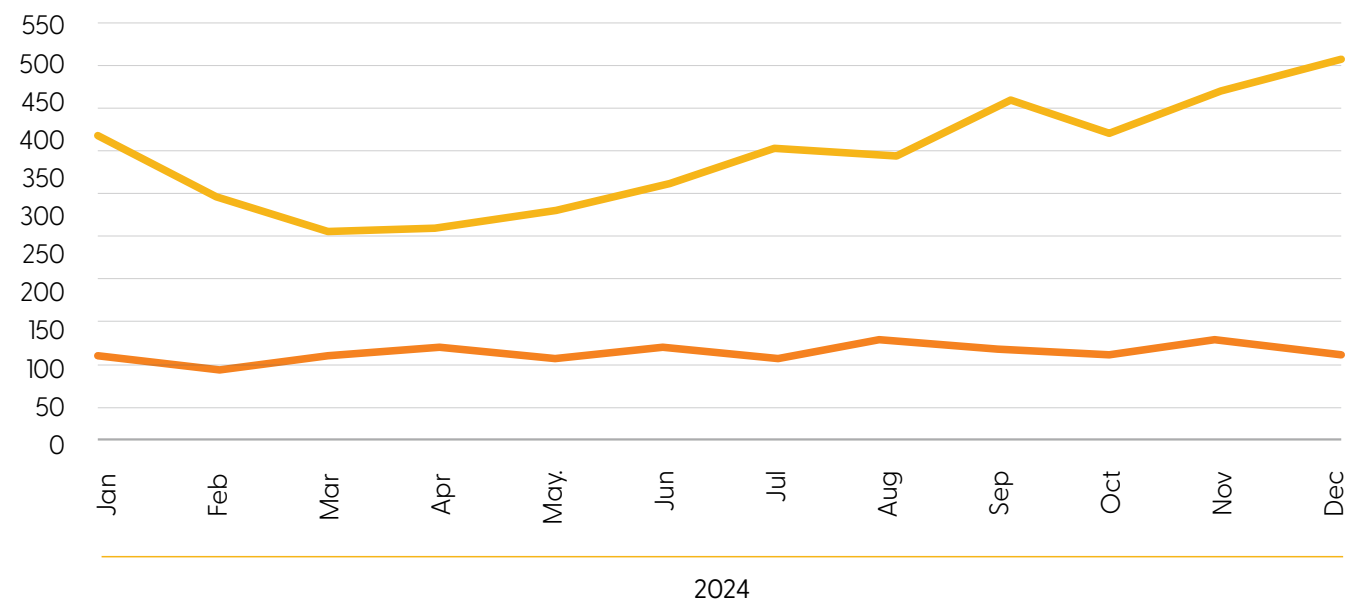
Market Clearing Price

— Market Clearing Price (TL/MWh)



Commodity Prices

— Natural Gas (USD/thousand Sm³) — Coal (USD/ton)



MACROECONOMIC DEVELOPMENTS

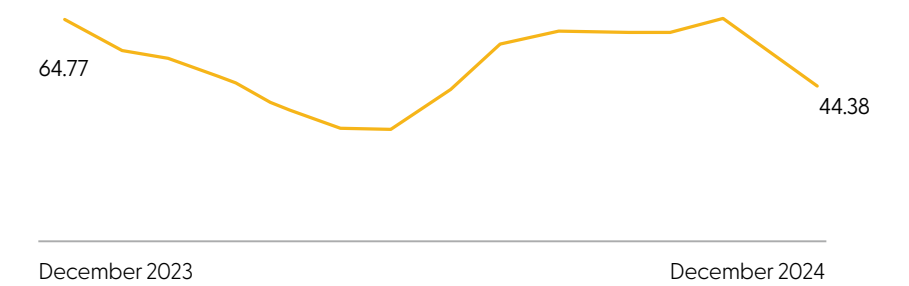
Growth: Gross Domestic Product (GDP) increased by 5.7%, 2.5%, and 2.1% in the first three quarters of 2024, respectively, compared to the same quarters of the previous year. While the share of the industrial sector in GDP declined by 2.2% in the first three quarters, most of the growth stemmed from the construction, finance and insurance, and agriculture sectors. In parallel with the rising GDP, electricity consumption increased from 241 TWh in the January-November 2023 period to 255 TWh in the same period of 2024, marking a 6% rise. According to the results of Türkiye's National Energy Plan studies, electricity consumption is expected to reach 380.2 TWh in 2025, 455.3 TWh in 2030, and 510.5 TWh in 2035.

Inflation: Inflation decreased from 64.77% at the end of 2023 to 44.38% by the end of 2024. This decrease was driven by the base effect, the tight monetary policies of the Central Bank of the Republic of Türkiye (CBRT), and exchange rate stability. Additionally, the more stable trajectory of global commodity prices compared to 2023 and improvements in supply chains also contributed to the decline in inflation.

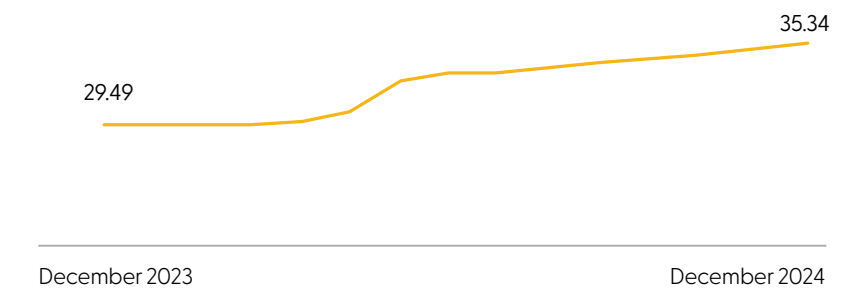
Interest Rate: At the end of 2023, the policy interest rate, which stood at 42.5%, was raised to 45% in January 2024 and 50% in March 2024 as part of the tight monetary policies of the Central Bank of the Republic of Türkiye (CBRT). Throughout the year, the policy rate remained at this level until the December meeting of the CBRT's Monetary Policy Committee, where it was reduced to 47.5%.

Exchange Rate: In 2024, the U.S. dollar exchange rate recorded an annual increase of 20%, closing the year at TL 35.34.

Inflation (%)



FX Rate Development (USD/TL)



Source: CBRT



TURKISH ELECTRICITY MARKET

REGULATIONS AND DEVELOPMENTS IN THE ELECTRICITY MARKET IN 2024

- The Unlicensed Electricity Generation Regulation, which was published in the Official Gazette on May 14, 2024, introduced regulations on nine articles and added a provisional article. Within this scope, the connection agreement period was set at one year, the validity of the zoning compliance letter was extended until the facility acceptance stage, the EIA process must be completed during project approval, and partial acceptances were made possible for projects under 10 MW. Additionally, flexibility was introduced for increases in mechanical installed capacity, and accepted facilities were granted the ability to change locations due to force majeure conditions.
- BOTAŞ kept the power plant tariff fixed at 12,000 TL/kSm³ from October 2023 until the end of 2024. As of August 1, 2024, it implemented a 33% increase for industrial subscribers, equalizing the tier 1 and tier 2 prices, and set the industrial tariff at 11,380 TL/kSm³. Additionally, it raised the residential tariff, which had been 4,081 TL/kSm³ since September 2022, by 38%, increasing the price to 5,631 TL/kSm³. These adjustments will remain in effect until the end of the year.
- The Ministry of Energy and Natural Resources, through its 2024-2028 Strategic Plan, aims to increase the share of domestic resources in electricity generation to 63% and expand solar and wind capacity to 33,100 MW and 19,300 MW, respectively. Additionally, the plan includes commissioning 4,800 MW of nuclear capacity and increasing daily oil and natural gas production to 210,000 barrels and 42.5 million cubic meters, respectively. Net-zero carbon transition, energy efficiency, green energy projects, and the development of domestic technologies are among the key priorities. The plan, structured around 7 objectives and 30 targets, aims to reduce external dependency and establish a sustainable energy infrastructure.
- The Ministry of Energy and Natural Resources has initiated the tender process for five wind energy projects with a total connection capacity of 1,200 MW through the YEKA RES-2024 announcement, published in the Official Gazette. Applications will be accepted on January 21, 2025, with a ceiling price set at 5.50 USD cents/kWh and a floor price of 3.50 USD cents/kWh. The ministry aims to increase installed renewable energy capacity to 120,000 MW by 2035 by holding at least 2,000 MW of YEKA tenders annually.
- In 2024, Minister of Energy and Natural Resources Alparslan Bayraktar took steps to enhance energy cooperation with Arab League states. Emphasizing that Türkiye's efforts to ensure energy supply security, reduce external dependency, and achieve climate goals will continue, Bayraktar highlighted the significance of Arab countries in the global energy market. He stressed the importance of cooperation in electricity, natural gas, and oil transmission networks and brought forward discussions on transforming the Development Road Project with Iraq into energy projects and exploring collaboration opportunities with Arab League states on critical minerals.
- TEİAŞ announced that the transmission system usage and system operation tariffs were revised by EPDK's Board Decision No. 12718, dated June 27, 2024, and became effective as of July 1, 2024. The new tariffs were published in the Official Gazette No. 32587 on June 29, 2024, and entered into force. The TEİAŞ transmission system usage and system operation tariffs, which were increased by 19% on January 1, 2024, received an additional 51% increase with the new tariffs published in the Official Gazette on September 29, 2024, which took effect on July 1, 2024.
- EÜAŞ has been supplying electricity to incumbent retail companies since August 2023. According to data published on EPIAŞ's transparency platform, it supplied a total of 92.4 TWh of electricity during the January–November 2024 period.
- For 2024, security deposit unit charges were increased by 62% across all subscriber groups. The unit charges were set as follows: TL 136.2 for residential subscribers, TL 183.7 for agricultural activities and lighting, TL 387.1 for industrial, public, and private service sectors, TL 68 for martyr families and veteran combatants.
- With the EPDK decision dated March 21, 2024, it was ruled that households eligible for monthly or regular social assistance will not be required to pay a security deposit for a new retail sales contract. Additionally, eligible individuals who do not have an electricity subscription in their name will receive a refund of the security deposit from their terminated contract, updated to the current value. This refund can be made in a single payment or in instalments until December 31, 2024.
- With the regulation published by EPDK on July 25, 2024, Organized Industrial Zone (OIZ) legal entities are now required to procure energy from the same supplier for all main meters. OIZs are expected to switch to a single supplier for energy procurement starting from September 1, 2024.
- On August 29, 2024, a decision amending the Decree on State Aid for Investments was published. Within this scope, it was stated that: Excess support payments made to investors will be reclaimed with late payment interest. Investments in photovoltaic solar panel production will be supported under certain conditions. The list of machinery and equipment not eligible for customs duty exemption has been revised.
- On July 29, 2024, the Presidency Investment Office published the Türkiye International Direct Investment Strategy. The strategy is primarily focused on attracting international investments to Türkiye. It serves as a roadmap for potential projects, with a particular emphasis on digital transformation, renewable energy, and energy efficiency.
- On September 5, 2024, the Medium-Term Program (2025–2027) was published. The program highlighted key themes such as Structural Transformation in Industry, Acceleration of Green Transition, New Generation Work Models, and Administered and Guided Prices. It outlined various support programs, including those related to green energy, and discussed initiatives aimed at green transition. Additionally, it was stated that regulated prices will be managed in alignment with inflation targets



TURKISH ELECTRICITY MARKET

- With the Board Decision issued by EPDK on November 9, 2024, the fifth implementation period for the income/tariff regulations applicable to electricity distribution companies and incumbent retail companies was set to be in effect from January 1, 2026, to December 31, 2030.
- With the Board Decision issued by EPDK on November 16, 2024, an amendment was made to the Communiqué on the Regulation of the Last Resort Supply Tariff (SKTT). Effective February 1, 2025, the SKTT limits were updated as follows: 5,000 kWh/year for the residential consumer group, 100 million kWh/year for temporary housing centres, drinking water supply and distribution facilities belonging to village legal entities, other consumers within the residential consumer group, and the agricultural activities consumer group. 15,000 kWh/year for all other consumer groups.
- On November 15, 2024, the Ministry of Energy and Natural Resources announced on its official website the publication of the 2023 National Energy Balance Tables. In 2023, the total primary energy supply amounted to 158.4 million toe (tons of oil equivalent), marking a 0.4% increase compared to 157.8 million toe in 2022. The domestic share of primary energy supply was recorded at 31%.
- On December 17, 2024, a total of nine regulations were published, including the Aggregator Regulation, which establishes the general framework for aggregator activities. This regulation aims to bring together distributed generation plants and enable consumers to participate in the electricity market as demand-side players, thereby managing grid imbalances more efficiently and reducing costs. Additionally, amendments were made to the Balancing and Settlement (DUY), Licensing, Ancillary Services, and Storage Activities regulations.
- With the Communiqué published by the Ministry of Energy and Natural Resources in the Official Gazette on December 26, 2024, administrative fines to be applied under Article 10 of Law No. 5627 on Energy Efficiency were increased by 43.93%, in line with the revaluation rate for 2024.
- According to the Board decisions published in the Official Gazette on December 29, 2024: Under Article 20 of the Licensing Regulation, the minimum capital requirement for entities applying for a license was set at: TL 28 million for a supply license, TL 50 million for an aggregator license. The fee for obtaining an Aggregator License was set at TL 10 million. For pre-license applications under electricity generation facilities with storage, the security deposit for the electricity storage unit was set at TL 70,000 per MWh, with a maximum security deposit of TL 45 million per project.
- With the decision of the Energy Market Regulatory Authority (EPDK) dated December 26, 2024, it was decided to update the security deposit amounts effective from January 1, 2025. The updated unit charges for the relevant subscriber groups are as follows: TL 569.4 for Industry, Public, and Private Service Sectors, and others, TL 200.3 for Residential subscribers, TL 100 for Martyr Families and Veteran Combatants, TL 270.2 for Agricultural Activities, Lighting, and others.

END USER SALES TARIFF

To cover the operation and maintenance costs of the existing electricity system and encourage investments in new and advanced generation and network infrastructure, the electricity bill components sent to the end consumer are given below:

Energy Consumption Charge: Consists of retail energy sales tariffs and distribution tariffs.

- **Retail Energy Sales Tariff:** This includes energy supply costs, the net profit margin determined as 2.38% over the supply cost for the fourth

tariff application period, and other costs related to the provision of retail sales services.

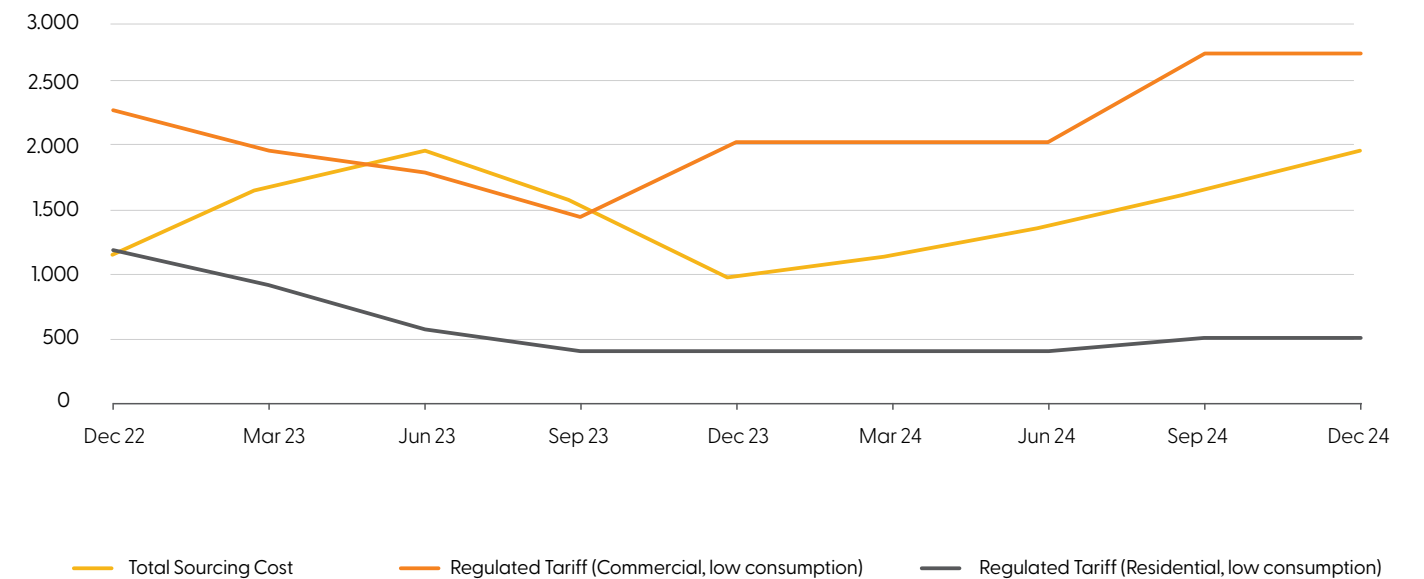
- **Distribution Tariff:** This component includes the costs of operating, maintaining, expanding and improving both distribution and transmission networks.

Other Fees: Consists of items such as power fee, power excess fee and reactive energy fee. These fees can vary based on the connection status, consumption quantity and purpose of use.

Taxes: Includes taxes such as VAT and Electricity Consumption Tax. The Energy Fund Fee and Turkish Radio and Television Corporation (TRT) share application were abolished as of 2022. Effective July 7, 2023, the VAT rate in the Residential and Agricultural Irrigation consumer groups increased from 8% to 10%; in other consumer groups, it increased from 18% to 20%.

These retail sales tariffs are determined by the EMRA.

Regulatory Electricity Tariffs (TL/kWh)



STRATEGIC PRIORITIES

Enerjisa Enerji continues to expand its high-quality grids at its distribution regions to provide their customers with uninterrupted energy.

As the leading energy company in Türkiye, Enerjisa focuses on electricity distribution, retail sales, and customer solutions, in addition to rendering public services. Building the needed energy infrastructure in Türkiye based on adherence to sustainability and customer requirements, the Company upholds excellence in its customer interactions and investment activities.

Enerjisa Enerji continues to expand its high-quality grids at its distribution regions to broaden its retail sales operations across the whole country and to deliver innovative and energy efficient solutions to its customers. Aiming for profitable growth and value creation for its shareholders, the Company is recognizing of its responsibility to society, and demonstrates commitment to acting as a role model in the industry.

Enerjisa Enerji develops its long-term strategies with a sustainable and holistic approach, into which it integrates Environmental, Social and Governance (ESG) factors.

Enerjisa Enerji builds its positioning and outlook based on its core capabilities, including its value proposition to its stakeholders, as well as the external trends changing the way people will need and use energy in the future. Closely monitoring external developments, the Company continuously reviews its strategy, which it predicates on global mega trends to impact the energy sector in the decades to come.

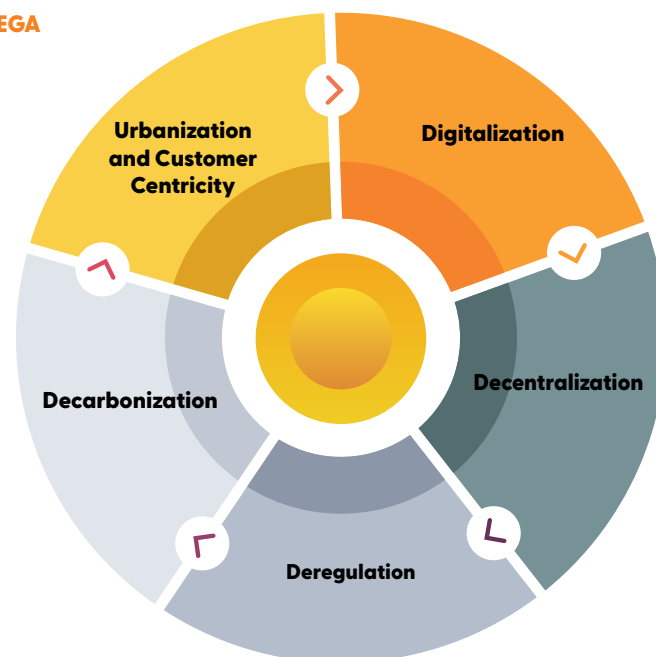
The five global mega trends that are the cornerstones of the Company's strategy and future perspective are, Digitalization, Decarbonization, Deregulation, Decentralization, Urbanization, and Customer Centricity.

Enerjisa Enerji visualizes a new energy world where the customer, acting both as energy consumer and producer, plays a more central role within the energy cycle, and utilizes only those energy sources generated from the renewable resources. In this new energy world, described in greater detail below, citizens and companies interact with energy in a more

digital, decentralized, and deregulated manner. Enerjisa Enerji is committed to asserting itself as the accelerator of this new energy transformation, in order to leave behind a sustainable world for generations to come.

Enerjisa Enerji supports legislative changes and explores new opportunities in the sector. Hence, the Company prepares itself for these fundamental changes in question, and with its sustainable energy solutions, assumes a pioneering role for the New Energy World.

GLOBAL MEGA TRENDS



THE NEW ENERGY WORLD

The New Energy World is the world we will be living in once we possess fully sustainable energy systems, smart infrastructure, and digitally interconnected technologies, where energy is produced in a cyclical manner.

In this world, customers are at the centre of the energy system, rather than being the final point in the distribution network. Customers can produce energy themselves decentrally; share it within their communities; or store it for their own future needs through advanced storage capabilities. With the developed grid infrastructure of the New Energy World, customers can also choose to sell back the energy to the grid, thus reigning in their energy costs.

The New Energy World will alter our mode of interaction with energy, not only on an individual basis, but also as we use

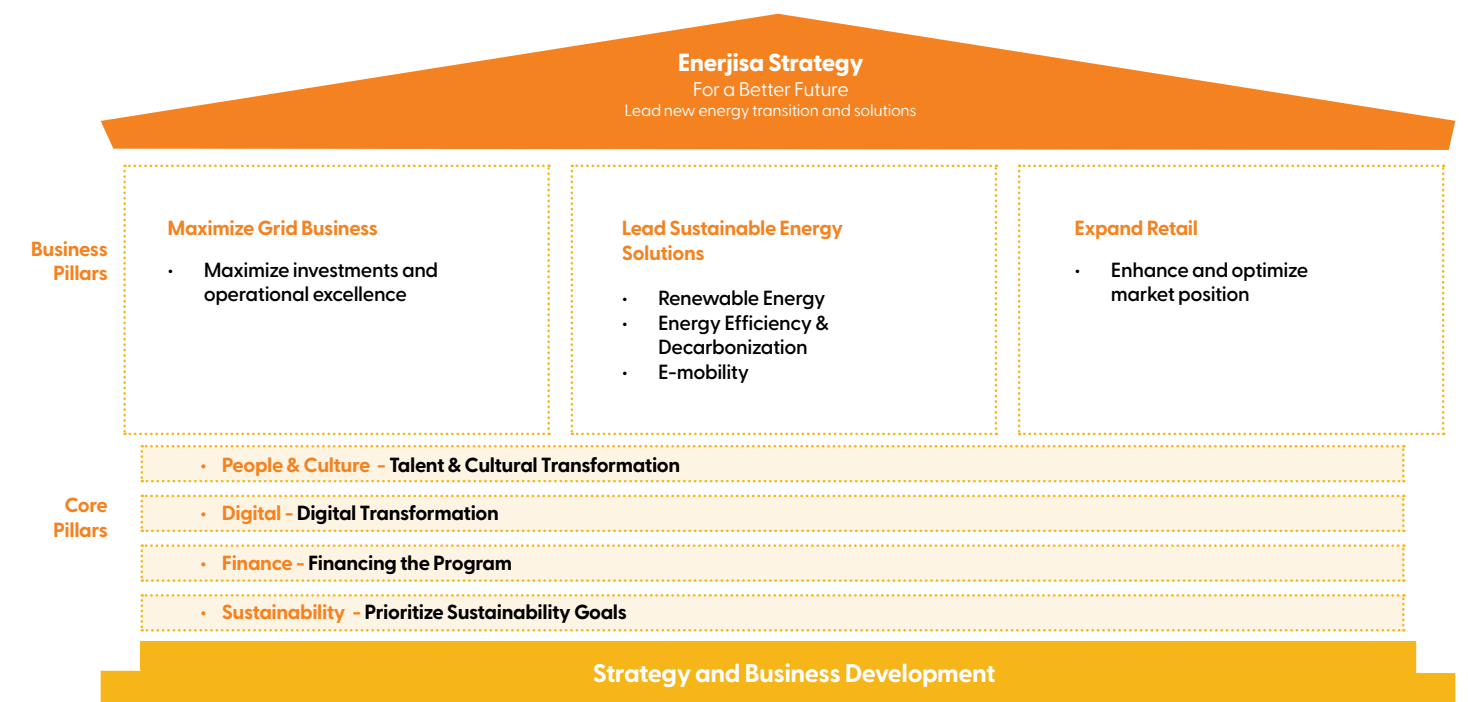
energy within and between our homes. Energy will be flexibly managed, and interlinked with our appliances, cars, and storage units, to digitally optimize our use and energy loads.

This transformation will pick up impetus once a greater number of individual consumers and companies assume an active stance in distancing themselves from the conventional energy world.

In its essence, the New Energy World is a world that provides us with a cleaner, smarter, more sustainable, and digital mode of living, and enables us to meet our energy needs, wherever and whenever they may arise. On the other hand, electricity grid is at the heart of this transformation which connects all trends together for more flexible and robust energy transition.

NEW ENERJISA STRATEGY HOUSE

To reach its targets and prepare for the future, Enerjisa Enerji has developed a strategic plan towards the vision of a better future for all. Our strategy is built on three key business pillars, and our core pillars. Supported by exemplary people and culture practices, enabled by state-of-the-art digital capabilities, defined by robust financials and motivated by ESG goals; the strategy seeks to position Enerjisa Enerji as the leader of the energy transition and new energy solutions while assuring maximum performance in our distribution, retail and customer solutions business lines:





STRATEGIC PRIORITIES

Enerjisa Enerji aims to position as the leader of the energy transition in Türkiye while **assuring maximum performance** in its distribution, retail sales and customer solutions business lines.

1. MAXIMIZE GRID BUSINESS

- **Maximize value creation in the electricity distribution business**

With strong growth fundamentals and a favourable position in an expanding market, Enerjisa Enerji will leverage its experience to continue growing in the distribution business line:

- Expand the grid network in its distribution regions by seizing growth opportunities while maximizing investment in the regulated asset base;
- Improve the quality of the grid and operations, focusing on operational excellence and digitalization;
- Prepare the network of tomorrow to facilitate a secure energy transition, building a resilient infrastructure ready for the growth of renewable energy sources and the rise of e-mobility;
- Ensure that execution and the relevant period's regulations are consistent by engaging with regulatory bodies to create the long-lasting framework required for operational continuity;
- Increase grid resiliency in the face of climate change, environmental crises and natural disasters.

2. LEAD SUSTAINABLE ENERGY SOLUTIONS

- **Deliver the energy services of tomorrow towards a better future for all**

Enerjisa Enerji leads the new energy solutions domain and energy transition aiming for sustainability through its offerings:

- Leverage broad customer base for market access, and be prepared to address changing customer demands and new macro trends by expanding the product portfolio;
- Attain growth in the sustainable energy solutions market with unique business models affording a competitive edge, creating value for customers in the distributed generation, energy efficiency and decarbonization domains;
- Expand e-mobility solutions and services as the trailblazer in the market and build the sustainable transportation infrastructure crucial to the energy transition, helping reduce the current account deficit deepened by energy imports;
- Hone in on organic and inorganic opportunities in the growth areas of the future such as smart cities, renewable energy, energy efficiency, decarbonization, e-mobility, energy storage and innovative grid solutions, to develop new capabilities with cutting edge technologies;
- Capitalize on a reliable partnership approach "For a Better Future," consistent with the needs and expectations of key stakeholders, namely the state, local governments, the general public, customers, business partners, shareholders, contractors, investors and employees.

3. EXPAND RETAIL

- **Expanding market coverage with a "customer first" approach**

Adapting to the macro conditions and the mega trends that influence its sector, Enerjisa Enerji continuously advances its retail business line with extensive expertise and a sustainability mindset:

- Ensure robust performance by optimizing market coverage and proactive financial management relevant to the economic context, showcasing vigorous adaptability;
- Develop organizational and operational capabilities characterized by excellence in service quality, efficiency and agility;
- Build the Enerjisa Enerji brand as the most distinguished energy company, delivering best-in-class customer experience with top customer satisfaction;
- Enhance capabilities in accordance with Enerjisa Enerji's competencies, diversifying the product portfolio in areas such as energy management and strengthening alternative revenue streams;
- Work with all regulatory authorities to assure consistency between execution and the regulatory framework of the relevant period and that the best services are delivered to the public; be the "benchmark" stakeholder to regulatory agencies.

4. ENHANCE THE CORE PILLARS

- **People & Culture:** Get ready for the future of work by transforming the culture while recruiting and retaining the best talents
- **Digital:** Enable sector-leading services, the network of tomorrow and value added products & solutions through holistic digital transformation, adapting to the newest technological advances
- **Finance:** Power the program with robust financial management and desirable financing
- **ESG:** Prioritize sustainability, social responsibility and ethical governance in our strategy

INNOVATION

Enerjisa Enerji invests in innovation to discover new opportunities through a systematic approach.

INNOVATION

Enerjisa Enerji, with a commitment to leading the New Energy World, invests in innovation to discover new opportunities through a systematic approach. Our innovation activities not only develop an innovation culture within the company, but also focus on the entrepreneurship ecosystem outside the company while establishing strong collaborations.

OPEN INNOVATION

Enerjisa Enerji conducts various collaborations in the area of open innovation with technology startups, companies, technology development zones and universities.

Collaborations with Technology Startups:

The company employs mainly two different models to collaborate with technology startups to attract innovative ideas:

1. Developing new products or services that can be utilised in our operational areas by leveraging the in-depth knowledge and agility of these startups.
2. Incorporating existing products and services from the startups to our portfolio and offering them to our customers, thereby building a channel between the product and consumer.

OPEN INNOVATION PROGRAM: İVME

Enerjisa Enerji launched the Open Innovation Program İVME to support startups producing innovative solutions for the energy sector. The program aims to help innovative startups with commercial potential and sustainable revenue models grow within the energy ecosystem.

In 2024, under the theme "End-to-End Value-Creating Solutions with Efficiency, Sustainability, and Next-Generation Technologies in the Energy Sector," selected startups entered an intensive acceleration phase. Entrepreneurs received technical mentoring, business model development training, commercialization strategies, and investor presentation support.

At the İVME Investment Day held in May, startups successfully presented to a jury consisting of the Innovation Committee and industry experts. Startups evaluated positively gained the opportunity to continue their activities within Enerjisa Enerji's ecosystem.

Graduated startups from the 2024 İVME Program:

Lumian: An IoT-based platform providing real-time energy data analysis and machine-learning-supported solutions. Its hardware-agnostic structure supports energy-saving and decarbonization goals.

Werer Energy: Delivers portable energy storage systems offering uninterrupted and sustainable energy solutions with a focus on mobility and efficiency.

These startups contribute to sustainable growth and efficiency targets by bringing innovative solutions to the energy sector. The İVME Program will continue to support startups shaping the future energy ecosystem.

Global Collaborations

Enerjisa Enerji focuses on accelerating digitalization processes with new technologies by offering innovative products and services to individual and corporate customers. In this context, the company runs joint projects with global companies in similar industries, particularly in Europe and North America, and collaborates with international accelerator programs hosting startups.

Enerjisa Enerji renewed its collaboration with the global innovation platform Plug and Play in Silicon Valley for a second year, aiming to accelerate knowledge and experience exchange within its ecosystem and create opportunities for field projects, partnerships, and investments. In 2024, over 180 startups were reviewed, more than 30 introductory meetings were held, and concept validation studies were conducted with two startups, detailed as follows:

- POC with EVE: A comprehensive strategy was created for converting 50 internal combustion vehicles into electric vehicles. The strategy optimized required range, vehicle models, charging infrastructure speed, and locations, while providing solutions to reduce energy and fuel costs. Feasibility analyses were completed, considering the impact of seasonal variations on vehicle ranges for operational sustainability.
- POC with CultureAMP: Insights and tools were provided to understand employee needs using human science and technology. The study aimed to support informed decision-making and foster a positive cultural transformation within the organization. Tangible recommendations were developed to measure and enhance Enerjisa's priorities in employee engagement and cultural transformation.

Local Collaborations

In 2024, partnerships were established with Bilkent Cyberpark, OSTİM Teknopark, Teknopark İzmir, Boğaziçi Ventures, KWORKS, and Üretken Akademi. Presentations of selected startup solutions were reviewed, and mentorship sessions were held. Another collaboration continues with the Entrepreneurial Institutions Platform, aiming to share best practices, create sub-communities for incubating startups, and connect innovation managers with successful internal entrepreneurship projects.

University Collaborations

Since 2017, Enerjisa Enerji has been a key partner of İTÜ Arı Teknokent's incubation centre, İTÜ Çekirdek. To date, 19 startups supported by Enerjisa Enerji have received approximately \$105 million in investments from local and global investors, with their combined valuation exceeding \$650 million. Enerjisa Enerji actively tracks the growth of startups such as Sutech, Eyes of Solar, and Energyment. At the 2024 Big Bang event held on December 18-19, two selected startups received grant support of 300,000 TL. Supported startups included Bluearf and MIOTE, one of Nar Program's corporate entrepreneurship initiatives.



INNOVATION

Enerjisa Enerji has continued to gather innovative ideas through its internal entrepreneurship and innovation program, Nar, for ten years now.

**CORPORATE ENTREPRENEURSHIP AND INNOVATION PROGRAM: NAR**

Valuing employee participation in its innovation approach, Enerjisa Enerji has been gathering innovative ideas through the Nar corporate entrepreneurship and innovation program for nine years. Each year, the program provides a platform for employees to produce and implement innovative ideas based on a designated theme. Employees undergo practical and theoretical entrepreneurship and design thinking training during the acceleration phase.

Under 2024's theme of "Development of Innovative, End-to-End Products, Services, or Business Models Capable of Driving Improvement and Commercialization", 89 idea submissions were received from employees. Among the applications for the acceleration phase of Nar's 10th term, which was held online, five ideas were accepted. The teams behind these ideas completed their entrepreneurship training and coaching sessions digitally. The five teams, deemed suitable to continue, presented their ideas online to the final jury, composed of Innovation Committee members, during the Investment Day event held in May.



The ideas that were evaluated positively during the Nar Investment Day were deemed suitable to continue their activities within Enerjisa.

Approved projects under the Nar Program:

- EN-TAKİP: A system for automated inventory tracking using RFID infrastructure across logistics, customer operations, occupational health, safety, and network operations.
- CarbZer0: An online energy management assistant that dynamically tracks carbon emissions per product using IoT devices.

- VoVO: Software that optimizes charge/discharge decisions for large-scale energy storage facilities using machine learning to generate financial gains.

VENTURE CAPITAL FUND INVESTMENTS

Enerjisa Enerji evaluates venture capital fund investments to play an active role as an investor in the entrepreneurial ecosystem, gain access to new technologies, business models, and products, and enhance knowledge of venture investment processes. In this

context, the company invested in Revo Capital Fund II, which has reached €90 million in size, with investors including the International Finance Corporation, European Bank for Reconstruction and Development, European Investment Fund, and German Development Finance Institution. Through this investment, Enerjisa Enerji aims to create business development opportunities for startups and strengthen Türkiye's technology startup ecosystem. Exit transactions in 2024 include investments such as Yazara and DefensX.



Financial Developments

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CONSOLIDATED FINANCIALS

Enerjisa Enerji A.Ş. Underlying Net Income was realised as TL 4,226 million in 2024.

CONSOLIDATED OPERATIONAL EARNINGS

Consolidated Operational Earnings (TLm)	2023	2024
Operating profit	21,507	27,599
Adjustment of depreciation and amortization	4,805	4,747
Adjustments related to operational fx losses	1,682	261
Adjustments related to interest income related to tariff receivables	-1,816	-4,502
EBITDA	26,178	28,105
Capex reimbursements	12,266	12,996
EBITDA + Capex reimbursements	38,444	41,101
Non-recurring (income) / expense	450	59
Operational Earnings	38,894	41,160

CONSOLIDATED UNDERLYING NET INCOME

Consolidated Underlying Net Income (TLm)	2023	2024
Operating profit before finance income/(expense)	21,507	27,599
Financial Income/(Expense)	-10,945	-20,262
Monetary Gain / (Loss)	-2,956	-4,594
Profit before tax	7,606	2,743
Taxation	-1,084	-7,596
Net Income	6,522	-4,853
Non-recurring (income) / expense	-1,518	38
Tax Rate Change	-2,134	-
Impact of asset revaluation	1,991	9,041
Underlying Net Income	4,861	4,226

UNDERLYING NET INCOME

Enerjisa Enerji A.Ş. Underlying Net Income decreased by 13% in real terms from TL 4,861 million in 2023 to TL 4,226 million in 2024. Below operational earnings line, the main effects in real terms were as follows:

- TL 9,510 million higher net loan and bond interest expenses.
- TL 1,421 million lower operational FX losses.
- TL 2,901 million higher other financial income.
- TL 1,638 million higher monetary loss as part of inflation accounting.

CONSOLIDATED FINANCIALS

Enerjisa Enerji's operational earnings for 2024 were realized as TL 41,160 million.

CONSOLIDATED FREE CASH FLOW AFTER INTEREST AND TAX

Consolidated Free Cash Flow after Interest and Tax (TLm)	2023	2024
Cash Flows from Operating Activities (before interest and tax)	14,831	25,082
CAPEX	-24,357	-18,698
Free cash flow (before interest and tax)	-9,526	6,384
Tax payments	-4,546	-1,116
Interest received	3,431	3,307
Interest paid	-10,887	-21,187
Free cash flow (after interest and tax)	-21,528	-12,612

CONSOLIDATED FREE CASH FLOW AFTER INTEREST AND TAX

Free Cash Flow after Interest and Tax increased from TL -21,528 million in 2023 to TL -12,612 million in 2024 due to lower tariff burden at Retail partially netted off with higher tariff burden at Distribution, higher interest payments and lower tax payments driven by higher funding need and financing costs.



DISTRIBUTION FINANCIALS

DISTRIBUTION INCOME STATEMENT

Distribution Income Statement (TLm)	1 January 31 December 2023	1 January 31 December 2024
Sales Revenue	92,999	80,015
Financial income	21,175	19,750
Distribution revenue	25,219	28,903
Pass-through transmission revenue	12,604	11,511
Lighting sales revenue	8,719	5,659
Investment revenue	25,039	14,000
Other	243	192
Cost of Sales	-65,382	-49,769
Energy purchases (Lighting, T&L)	-11,199	-8,392
Investment costs	-25,039	-15,028
Pass-through transmission cost	-12,604	-11,511
Other	-16,540	-14,838
Gross Profit	27,617	30,246
OPEX	-9,152	-8,880
Other Income/(Expense)	-907	1,255
Operating Profit Before Finance Income/(Expense)	17,558	22,621
Adjustment of depreciation and amortization	1,776	1,616
Adjustments related to operational fx gains and losses	1,542	249
Adjustments related to interest income related to tariff receivables	-1,828	-3,845
EBITDA	19,048	20,641
CAPEX Reimbursements	12,267	12,996
EBITDA+CAPEX Reimbursements	31,315	33,637
Non-recurring (income)/expense	74	207
Operational Earnings	31,389	33,844

DISTRIBUTION OPERATIONAL EARNINGS

Distribution Operational Earnings (TLm)	2023	2024
Financial Income	21,175	19,750
Capex reimbursements	12,267	12,996
Efficiency & Quality	-3,087	2,072
Other	1,034	-974
Operational Earnings	31,389	33,844

DISTRIBUTION OPERATIONAL EARNINGS

Distribution business unit's operational earnings accounted for 82% of Enerjisa Enerji's operational earnings in 2024. The main differences in the operational earnings of the Distribution business unit in 2024 compared to 2023 are mainly due to:

- **Financial Income:** Financial income decreased by 7% annually reaching TL 19,750 million.
- **CAPEX Reimbursements:** Capex reimbursements increased by 6% from TL 12,267 million in 2023 to TL 12,996 million in 2024.
- **Efficiency & Quality Earnings:** Total Efficiency & Quality item was realized as TL 2,072 million mainly due to the improvement in outperformance and quality bonuses (2023: TL -3,087 million)
- **Other Items:** Other items were realized as TL -974 million (2023: TL 1,034 million).

DISTRIBUTION FREE CASH FLOW BEFORE INTEREST AND TAX

Distribution Free Cash Flow Before Interest and Tax (TLm)	2023	2024
Operational Earnings	31,389	33,844
TAS 29 impacts	-7,089	-4,293
Financial income not yet cash-effective	-13,828	-13,165
Capex outperformance	-152	1,028
Net working capital and other	12,988	2,492
Operating Cash Flow (before interest & tax)	23,308	19,906
TAS 29 impacts	-4,912	-2,146
Actual allowed Capex	-19,584	-13,093
Capex outperformance	152	-1,028
VAT paid	-3,425	-2,812
Unpaid and previous year Capex	4,685	1,490
Cash-effective Capex	-23,084	-17,589
Free Cash Flow (before interest & tax)	224	2,317

RETAIL SALES FINANCIALS

The contribution of the Retail Sales business unit in operational earnings has been 11% in 2024.

RETAIL SALES INCOME STATEMENT

Retail Sales Income Statement (TLm)	1 January 31 December 2023	1 January 31 December 2024
Sales Revenue (net)	148,158	101,873
<i>Regulated</i>	90,143	49,546
<i>Liberalized</i>	58,015	52,327
Cost of Sales (-)	-140,262	-95,172
<i>Regulated</i>	-83,663	-44,334
<i>Liberalized</i>	-56,599	-50,838
Gross Profit	7,896	6,701
OPEX	-3,958	-3,935
Other Income/(Expense)	1,279	2,258
Operating Profit Before Finance Income/(Expense)	5,217	5,024
Adjustment of depreciation and amortization	353	342
Adjustments related to operational fx gains and losses	141	12
Adjustments related to interest income related to tariff receivables	12	-656
EBITDA	5,723	4,722
Non-recurring (income) / expense	377	-147
Operational Earnings	6,100	4,575

RETAIL SALES OPERATIONAL EARNINGS

Retail Sales Operational Earnings (TLm)	2023	2024
Regulated gross profit	6,654	5,211
Liberalized gross profit	2,264	1,607
Opex	-3,604	-3,593
Bad debt related income and expense	301	1,334
Other	485	16
Operational Earnings	6,100	4,575

RETAIL SALES OPERATIONAL EARNINGS

The contribution of the Retail Sales business unit in operational earnings was 11% in 2024. The gross profit of the regulated market has decreased by 22% on an annual basis from TL 6,654 billion in 2023 to TL 5,211 billion in 2024, due to the weighted average cost of energy supply increasing at a rate lower than inflation and the reduced impact of

support mechanisms to keep the tariff low, along with a higher volume of energy supply at a lower price from EÜAŞ. Meanwhile, liberalized gross profit decreased in real terms by TL 657 million to TL 1,607 million again due to lower real margins driven by the cost of energy supply increasing at a rate lower than inflation.

In contrast to the difficult market conditions in terms of margins, Enerjisa Enerji was able to increase its electricity volumes sold in both markets. Regulated segment sales increased by 7% from 30.4 TWh in 2023 to 32.5 TWh in 2024. Meanwhile, liberalized segment's sales were realized as 16.9 TWh in 2024 compared to 12.8 TWh in 2023 (32% yoy growth).

RETAIL SALES KPIs

Retail Sales	2023	2024
Sales Volume (TWh)	43.2	49.4
Regulated (TWh)	30.4	32.5
Liberalized (TWh)	12.8	16.9
Corporate	12.8	16.6
Residential & SME	0.1	0.3
Gross Profit Margin (%)	6.1%	6.7%
Regulated (%)	7.3%	10.5%
Liberalized (%)	3.8%	3.0%
Other		
Customer number (m)	10.7	10.8
Churn rates (%)	0.1%	0.1%

Retail Sales Free Cash Flow Before Interest and Tax (TLm)

Operational Earnings	6,100	4,575
IAS 29 impacts	-1,237	-704
Price equalization effects	-12,508	3,065
Net deposit additions	463	228
Delta NWC	3,656	260
Operating Cash Flow (before interest & tax)	-3,526	7,424
IAS 29 impacts	-90	-38
Capex	-315	-260
Free Cash Flow (before interest & tax)	-3,931	7,126

CUSTOMER SOLUTIONS FINANCIALS

The operational earnings of Customer Solutions business **increased in real terms by TL 1,307 million to TL 2,998 million.**

CUSTOMER SOLUTIONS INCOME STATEMENT

Customer Solutions Income Statement (TLm)	1 January 31 December 2023	1 January 31 December 2024
Sales Revenue (net)	2,359	8,657
Cost of Sales (-)	-976	-2,865
Gross Profit	1,383	5,792
OPEX	-632	-552
Other Income/(Expense)	862	-2,378
Operating profit before finance income/(expense)	1,613	2,862
Adjustment of depreciation and amortization	78	136
EBITDA	1,691	2,998
Non-recurring (income) / expense	0	0
Operational earnings	1,691	2,998

CUSTOMER SOLUTIONS OPERATIONAL EARNINGS

Customer Solutions Operational Earnings (TLm)	2023	2024
Revenue	2,359	8,657
Cost of Sales	-898	-2,729
Gross Profit (exc. depreciation)	1,461	5,928
OPEX	-632	-552
Other	862	-2,378
Operational Earnings	1,691	2,998

CUSTOMER SOLUTIONS OPERATIONAL EARNINGS

The operational earnings of Customer Solutions business increased in real terms by TL 1,307 million to TL 2,998 million (2023: TL 1,691 million), driven by increased demand for solar power projects, where we install solar panels for our industrial and commercial customers, providing them with access to green energy.

CUSTOMER SOLUTIONS KPIS

Customer Solutions		
Installed Capacity		
Solar PV Installed Capacity (MWp)	29.5	102.4
Combined Heat and Power (MW)	3.8	3.8
E-mobility		
Charging plugs	1,780	2,563
Charging locations	1,003	1,508
Customer Solutions Free Cash Flow Before Interest and Tax		
Operational Earnings	1,691	2,998
IAS 29 impacts	-2,072	-466
Delta NWC	-4,418	-5,238
Operating Cash Flow (before interest & tax)	-4,799	-2,706
IAS 29 impacts	68	-140
Capex	-832	-228
Free Cash Flow (before interest & tax)	-5,563	-3,704



FINANCING

Enerjisa Enerji issued bonds totalling TL 17.8 billion in 2024.

Enerjisa Enerji aims to pursue its financial activities by managing interest, liquidity and exchange rate risks in concert with its operating revenues and long-term strategies.

In addition to cash flows obtained from operations, Enerjisa Enerji continued to use external financing to fund its Distribution and Customer Solutions investment expenditures and working capital needs in 2024.

As a result of various additional resolutions of the Central Bank and the Banking Regulation and Supervision Agency, the availability of liquidity from banks was considerably limited in 2024. Throughout the period of limited liquidity, financing needs continued to be met through cash flows from operations, bank loans and bonds. Additionally, two new long-term agreements were signed with the European Bank for Reconstruction and Development (EBRD) on January 30, 2024 to utilize a USD 100 million equivalent Turkish Lira loan and, with the Industrial Development Bank of Türkiye (TSKB) on October 17, 2024 to utilize a USD 100 million equivalent Turkish Lira loan. With these new loans, it is planned to meet the financing needs of Toroslar Distribution Region which is mainly affected by the February 6th earthquake.

With a view to leveraging all possible financing sources in this environment of limited liquidity, Enerjisa Enerji applied for green bond shelf registration of TL 20 billion on November 14, 2024. In addition, Enerjisa also applied for conventional shelf registration of TL 80 billion on November 18, 2024. The Company declared, within the scope of the Green Finance Framework, that the funds to be secured through green financing (such as loans and bond issuances) would be used for green projects; and provided relevant information on its Impact and allocation report, which is published both in the company website and the Public Disclosure Platform (KAP) on October 24, 2024. Enerjisa Enerji also prepared a Sustainability-Linked Financing Framework and published it on its website in December 2024, together with the relevant Second Party Opinion.

The Company issued bonds totalling TL 17.8 billion throughout the year to meet some of its 2024 financing needs. As of the end of December 2024, the company has a total bond issuance amounting to 32.3 billion TL in circulation, with details provided in the table next page.

A TL 4.8 billion bond issuance was realized in February 2025 which is also the highest volume issuance realized in real sector in Türkiye.

On June 26, 2024, JCR Eurasia Rating updated the long-term national credit rating of Enerjisa Enerji A.Ş. as “AA (TR)” with a “stable” outlook and affirmed long-term international local/foreign currency credit ratings as “BBB+”. In addition, on November 18, 2024, the Fitch Rating Agency revised the long-term national credit rating of Enerjisa Enerji A.Ş. as “A (TUR)”, and the outlook for the Company’s ratings as “stable”.

Enerjisa Enerji’s debt portfolio does not incorporate any currency risk. As of end of December 2024, 97% of the bank loans and bonds on the Company’s balance sheet are denominated directly in the Turkish Lira. The remaining 3% consists of a foreign currency loan, which is hedged against foreign currency risk with derivative products.

In addition to bank loans and bonds, there is EUR 24 million in Turkish Electricity Distribution Corporation (TEDAŞ) debt as of the end of December 2024, which is classified as “other financial debt” in the balance sheet (debt within the scope of the loan agreements made by TEDAŞ with the European Investment Bank and World Bank, and transferred to the Company upon transfer of operating rights). This amount is fully hedged against foreign currency risk with derivative products.

List of Outstanding Bonds as of 2024 Year-end

Issuer	Type	Issuance Amount (million)	Currency	Date	Maturity	Interest Rate	Issuance Type
Enerjisa Enerji A.Ş.	Bond	1,375	TL	3.03.2023	12.03.2025	33.0%	Qualified Investors
Enerjisa Enerji A.Ş.	Bond	950	TL	6.04.2023	4.04.2025	35.0%	Qualified Investors
Enerjisa Enerji A.Ş.	Bond	1,183	TL	21.06.2023	4.07.2025	42.5%	Qualified Investors
Enerjisa Enerji A.Ş.	Bond	3,100	TL	17.07.2023	17.07.2025	42.5%	Qualified Investors
Enerjisa Enerji A.Ş.	Bond	2,260	TL	9.08.2023	8.08.2025	39.0%	Qualified Investors
Enerjisa Enerji A.Ş.	Bond	1,000	TL	20.09.2023	25.09.2025	48.0%	Qualified Investors
Enerjisa Enerji A.Ş.	Bond	2,600	TL	2.10.2023	8.10.2025	49.5%	Qualified Investors
Enerjisa Enerji A.Ş.	Bond	2,000	TL	25.10.2023	17.01.2025	48.0%	Qualified Investors
Enerjisa Enerji A.Ş.	Bond	2,000	TL	3.01.2024	2.01.2026	TLREF + 4.75%	Qualified Investors
Enerjisa Enerji A.Ş.	Bond	3,500	TL	8.02.2024	5.02.2026	TLREF + 4.25%	Qualified Investors
Enerjisa Enerji A.Ş.	Bill	1,100	TL	8.04.2024	7.04.2025	52.5%	Qualified Investors
Enerjisa Enerji A.Ş.	Bill	1,600	TL	6.05.2024	5.05.2025	52.0%	Qualified Investors
Enerjisa Enerji A.Ş.	Bill	1,000	TL	14.05.2024	13.05.2025	50.2%	Qualified Investors
Enerjisa Enerji A.Ş.	Bond	3,255	TL	26.07.2024	24.07.2026	TLREF + 1%	Qualified Investors
Enerjisa Enerji A.Ş.	Bond	1,000	TL	30.07.2024	24.07.2026	TLREF + 1%	Qualified Investors
Enerjisa Enerji A.Ş.	Bond	2,200	TL	21.10.2024	19.10.2026	TLREF + 1%	Qualified Investors
Enerjisa Enerji A.Ş.	Bond	1,500	TL	14.11.2024	12.11.2026	TLREF + 1%	Qualified Investors
Enerjisa Enerji A.Ş.	Bond	670	TL	14.11.2024	12.11.2026	TLREF + 1%	Qualified Investors
Total		32,293	TL				

³ TLREF - Turkish Lira Overnight Reference Rate

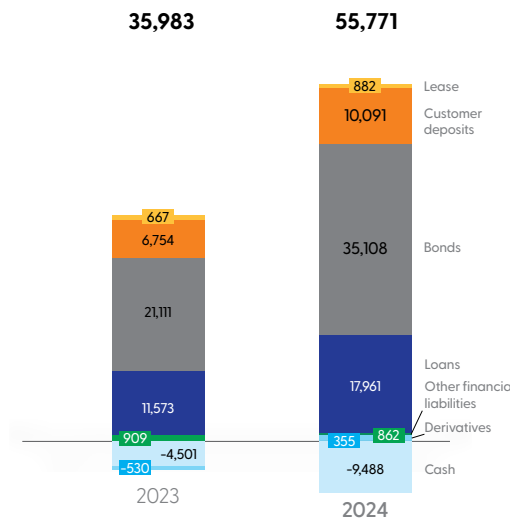
ECONOMIC NET DEBT DEVELOPMENT

Economic Net Debt increased by 55%, from TL 36.0 billion in December 2023 to TL 55.8 billion in 2024. Net Financial Debt/Operational Earnings* remained stable as 1.1x in December 2023 and in December 2024.

Economic Net Debt Development (Without TAS 29 Impact)		(TLm)
Economic Net Debt (Dec 31, 2023)		35,983
Free cash flow (bIT)		-6,329
Net interest payments		15,799
Tax payments		1,072
Change in deposits		3,337
Dividend payments		3,295
Other		2,614
Economic Net Debt (Dec 31, 2024)		55,771

* With TAS 29 impact

Economic Net Debt Composition (TLm)



2025 OUTLOOK

Enerjisa Enerji targets to grow its earnings in 2025 beyond current inflation assumptions.

2025 Outlook

In 2024, Enerjisa Enerji successfully met all of its targets as communicated to the market in our financial outlook. Our strategic focus, operational efficiency, and commitment to sustainability enabled us to achieve these milestones, demonstrating our resilience in a challenging market environment. Moving into 2025, we remain confident in our ability to execute on our ambitious plan to be the leading energy transition company of Türkiye. With a clear strategy, robust performance, and adaptability, we are committed to achieving our new goals for 2025 and further strengthening our position in the market. The targets for all of our metrics reveal our ambitious growth plan to create additional value for our shareholders. Especially our ability to increase the dividend payout remain one of our core commitments.

Guidance	2024 Targets	2024 Actuals	2025 Targets
Operational Earnings	TL 40-45 billion	TL 41.2 billion ✓	TL 52-57 billion
Underlying Net Income	TL 3.5-4.5 billion	TL 4.2 billion ✓	TL 5.0-6.0 billion
Investments	TL 15-17 billion	TL 15.5 billion ✓	TL 21-24 billion
Regulated Asset Base (RAB)	TL 55-60 billion	TL 59.0 billion ✓	TL 80-90 billion
Dividend Payment	80% of the Underlying Net Income	2.87TL/Share* ✓	80% of the Underlying Net Income

* The stated amount will be proposed during the 2024 Annual General Assembly.



Operational Developments

- 94 Distribution
- 110 Retail Sales
- 130 Customer Solutions

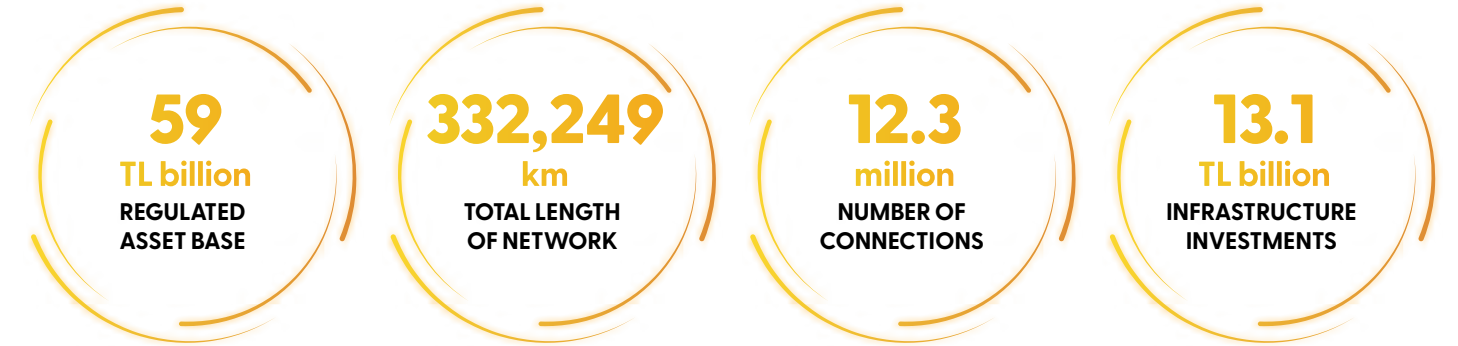
DISTRIBUTION

The essence of Enerjisa Enerji's distribution activities consists of people, solution, and innovation-oriented efforts. **The Company takes a pioneering role in the distribution sector with its operations aimed at improving the service quality.**

Enerjisa Enerji carries out its electricity distribution activities in 3 distribution regions, namely Başkent, AYEDAŞ and Toroslar. In these 3 regions spanning 14 provinces, the Company serves a population of 22 million accounting for approximately 26% of the grid connections in Türkiye.

The essence of Enerjisa Enerji's distribution activities consists of people, solution, and innovation-oriented efforts. The Company takes a pioneering role in the distribution sector with its operations aimed at improving the service quality.

As the sector leader, Enerjisa Enerji is one of the top companies in Türkiye in terms of openness for development. The company leads the New Energy World, which is shaped by mega trends, by adapting the most innovative technological applications in the world and in Türkiye to its own system and arranging its processes accordingly.



DISTRIBUTION ACTIVITIES

Distribution is defined as the delivery of electricity to the end user through power lines with a voltage level below 36 kV. Pursuant to "Electric Power Sector Reform and Privatization Strategy Document," the electricity distribution grid in Türkiye is divided into 21 distribution regions. Following the completion of privatizations between 2009 and 2013, all distribution regions started to be operated by private companies.

Each of the regional distribution grid operators is obliged to fulfil the following responsibilities in their region:

- Operation of the distribution grid,
- Making the necessary investments in maintenance, repair, environment, security, renovation and expansion,

- Maintaining and reading electricity meters,
- Preparing demand forecasts and investment plans,
- Monitoring electricity theft-loss rates,
- Purchasing electricity to cover technical and commercial losses,
- Taking necessary technical and operational measures to reduce theft-loss rates,
- Providing illumination in public areas.

Enerjisa Enerji centrally manages and monitors all of its operations in the 3 distribution regions within its operation area, and plans and conducts its operations related to distribution grids.

As part of the distribution grid management processes, the Company also engages in expansion and modernization of the distribution grid, increasing the distribution grid's operational efficiency as well as research and development activities. These activities enable the Company in all 3 regions to;

- Standardize distribution grid management processes,
- Create centralized procedures,
- Determine the important performance indicators such as compliance with the technical and commercial standards of the EMRA, supply reliability standards and interruption, theft-loss targets,
- Plan system improvements,
- Control and monitor local distribution grids,
- Carry out customer-related activities.



DISTRIBUTION

In 2024, the Company distributed 53.95 TWh gross electricity through 332,249 km distribution lines.

DISTRIBUTION COMPANIES

Enerjisa Enerji carries out its electricity distribution activities in 14 provinces across 3 regions through Başkent Elektrik Dağıtım A.Ş. (Başkent EDAŞ), İstanbul Anadolu Yakası Elektrik Dağıtım A.Ş. (AYEDAŞ) and Toroslar Elektrik Dağıtım A.Ş. (Toroslar EDAŞ). In 2024, the Company distributed 53.95 TWh gross electricity through a 332,249 km long distribution grid.

BAŞKENT ELEKTRİK DAĞITIM A.Ş.

Başkent EDAŞ builds, maintains and operates electricity distribution grids in provinces within the Başkent Electricity Distribution Region. The Company provides access to electricity distribution for 7.8 million people within the distribution region which covers Ankara, Bartın, Çankırı, Karabük, Kastamonu, Kırıkkale and Zonguldak provinces. In 2024, Başkent EDAŞ distributed a gross total of 17.88 TWh electricity via 140,921 km long distribution network.

Enerjisa Enerji was awarded the tender for the privatization of 100% of the shares of Başkent Elektrik Dağıtım A.Ş. through block sale method on July 1, 2008 for USD 1,225 million. The transfer of the shares was completed on January 28, 2009. Under the Transfer

of Operating Rights (TOR) agreement signed with Türkiye Elektrik Dağıtım A.Ş. (TEDAŞ) on March 31, 2006, Başkent EDAŞ is entitled to distribute electricity in a total of 7 cities - Ankara, Bartın, Çankırı, Karabük, Kastamonu, Kırıkkale and Zonguldak - for a period of 30 years, until September 1, 2036.

İSTANBUL ANADOLU YAKASI ELEKTRİK DAĞITIM A.Ş.

AYEDAŞ builds, maintains and operates electricity distribution grids in sub-provinces within İstanbul Anadolu Yakası Electricity Distribution Region. Providing electricity distribution service to approximately 5.7 million people residing at the Anatolian Side of İstanbul, AYEDAŞ distributed a gross total of 14.01 TWh electricity via 34,821 km long distribution network of in 2024.

Enerjisa Enerji was awarded the tender for the privatization of 100% of the shares of AYEDAŞ through block sale method for USD 1,227 million. The transfer of the shares was completed on July 31, 2013. Under the Transfer of Operating Rights (TOR) agreement signed with TEDAŞ on July 24, 2006, AYEDAŞ is entitled to distribute electricity on the Anatolian side of İstanbul until December 31, 2042.

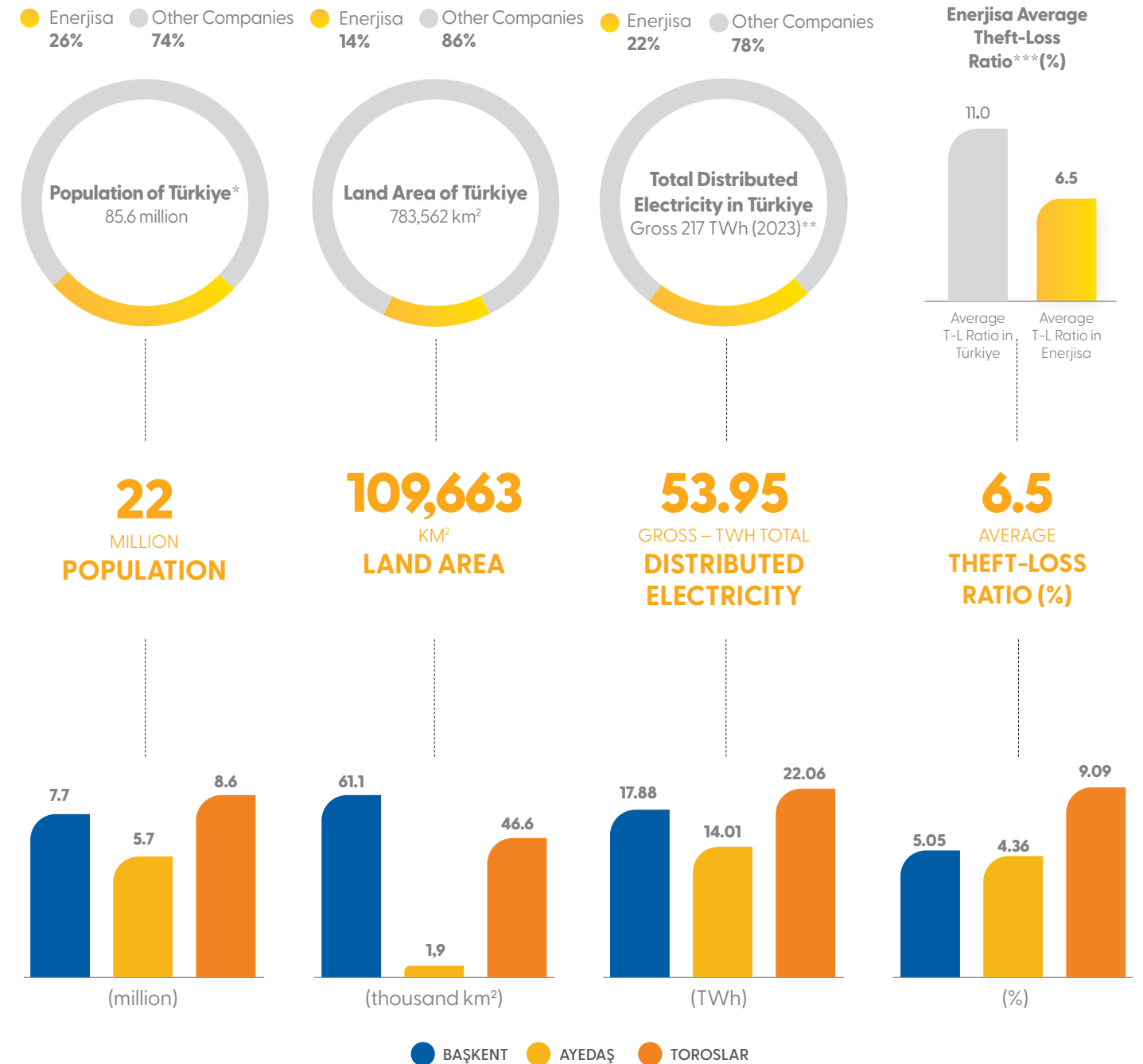
TOROSLAR ELEKTRİK DAĞITIM A.Ş.

Toroslar EDAŞ builds, maintains and operates electricity distribution grids in provinces within its distribution region. The Company provides electricity distribution to 8.7 million people within Toroslar Electricity Distribution Region which covers Adana, Gaziantep, Hatay, Kilis, Mersin and Osmaniye provinces. In 2024, Toroslar distributed a gross total of 22.06 TWh electricity via 156,505 km long distribution network.

Enerjisa Enerji was awarded the tender for the privatization of 100% of the shares of Toroslar through block sale method for USD 1,725 million. The transfer of the shares was completed on September 30, 2013. Under the TOR agreement signed with TEDAŞ on July 24, 2006, Toroslar is entitled to distribute electricity in Adana, Gaziantep, Hatay, Kilis, Mersin and Osmaniye until December 31, 2042.

	License Start Date	License End Date
Başkent	1 September 2006	1 September 2036
AYEDAŞ	1 September 2006	31 December 2042
Toroslar	1 September 2006	31 December 2042

DISTRIBUTION COMPANIES IN FIGURES



* TURKSTAT

** EMRA 2023 Report

*** Türkiye theft and lost figure is based on 2023 EMRA sector Report. 2024 Enerjisa data is calculated based on the Company's legal reporting figures.

DISTRIBUTION

In 2024, Enerjisa Enerji's investments into its distribution grid reached approximately TL 13.1 billion.

INVESTMENTS

Long-term and steady investments should be sustained to ensure continuity in the service quality and supply security of the electricity distribution grid. However, investments in the distribution grid remained relatively limited before the privatization of the distribution companies in Türkiye. Following the privatization, investments increased and were executed in line with the needs.

Nevertheless, the nationwide increase in the number of electricity grid users as well as the energy demand is expected to continue in the long-term. The current momentum in investments needs to be sustained in order to reach the quality criteria of the developed countries in grid service quality. Moreover, the mega trends in the energy sector and the electrification trend in the energy demand is estimated to increase the investment requirement in the distribution grid. Considering these factors, the increase in investments is expected to continue.

Electricity distribution investments are subject to regulations and the investment amounts are determined by the EMRA for regulatory periods of 5 years. Investment plans and realizations of these investments are inspected by public institutions (Energy Market Regulatory Authority (EMRA), Ministry of Energy and Natural Resources (MoENR), Turkish Electricity Distribution Corporation (TEDAŞ)).

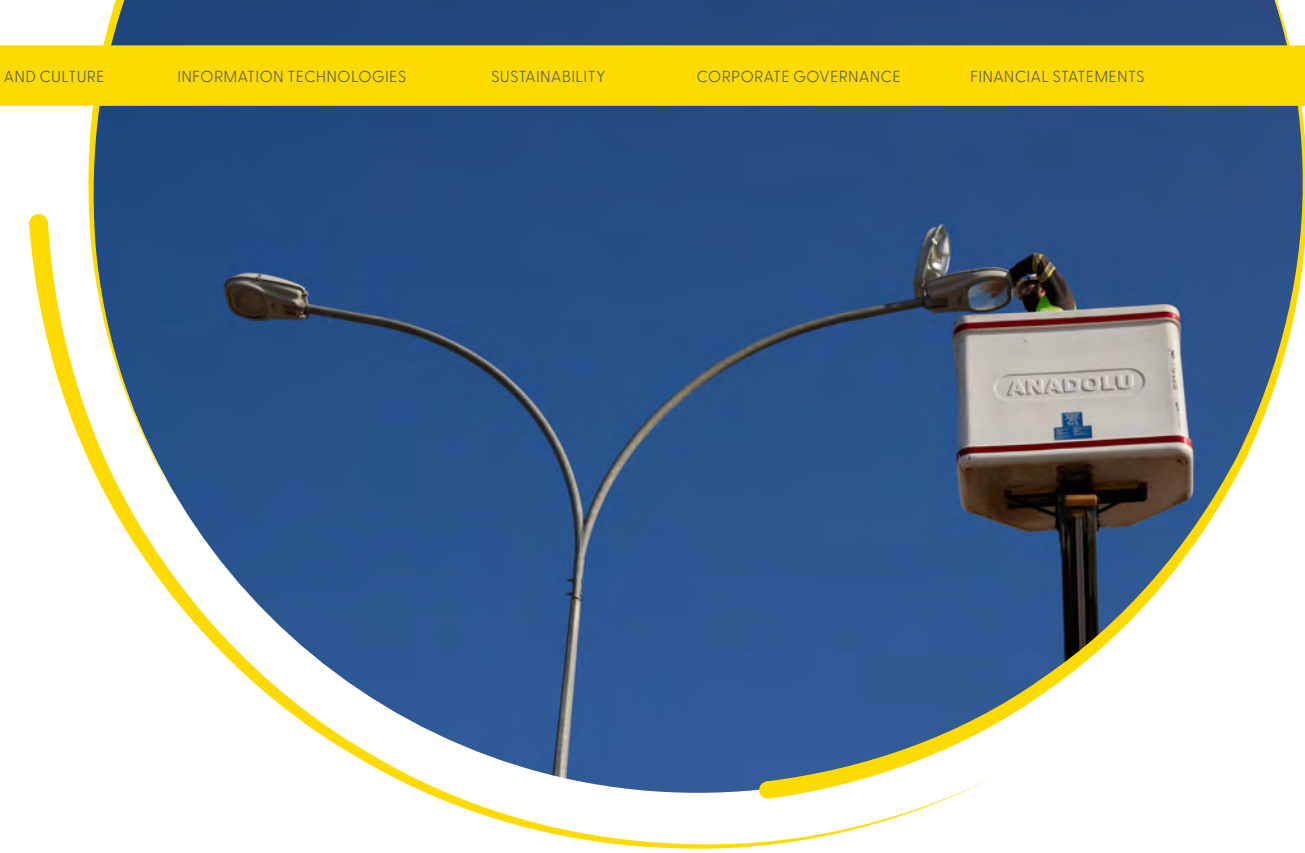
Distribution companies are responsible for assessing the energy demand, lighting grid requirements, investment requirements to renovate the grid and improve the grid topology; as well as developing and implementing investment plans. In these assessments, the quality indicators and other indicators regarding the current status and operation of the grid, needs identified through field surveys, energy demand and demands of users, local authorities, public institutions and organizations are taken into consideration.

Furthermore, monitoring the investment budget, preparing the investment reports submitted to the EMRA with the 5-year investment budget and justification reports, and developing a master plan that include 5-year and 10-year plans are also among the duties of the distribution companies.

4th Regulatory Period

For the 4th regulatory period that started in 2021, EMRA continued to incentivize investments in the sector via increasing the CAPEX allowance.

In the fourth regulatory period, total initial allowed CAPEX of Enerjisa Enerji Distribution Companies for 2021-2025 is set at TL 13.5 billion based on 487.38 CPI (Oct 2020). Accordingly, initial CAPEX allowance increased by 72% in real terms compared to the third regulatory period.

**Developments in 2024**

Enerjisa Enerji sustained strong growth in 2024. The Company continued to meet the energy demand in its distribution regions with its high operational capacity and sound financial structure and carried on with its investments in lighting, grid modernisation improvement and similar investments, as well as its investments in technology and digitalisation to

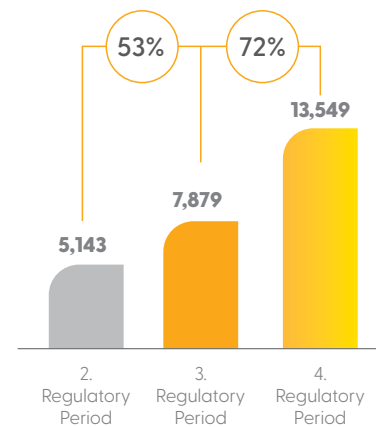
support the operation of the distribution grid. In 2024, Enerjisa Enerji's investments reached approximately TL 13.4 billion.

Enerjisa Enerji updates its investment plans throughout the year in line with changes in field needs and financing costs. Starting in 2023 and continuing throughout 2024, disasters caused by the earthquake in the Toroslar region and adverse weather conditions in the Başkent region had an impact on

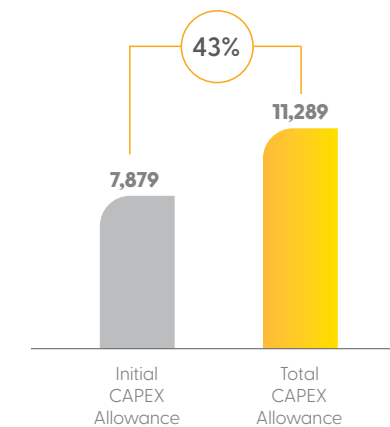
operational processes. Despite these challenges, the Company maintained its momentum in investment activities thanks to agile investment and procurement planning in all three Distribution Companies. 2024 planning took into account the impact of the disasters in the Toroslar and Başkent regions.

As a result of the investments made, the regulated asset base reached TL 59.0 billion as of the end of 2024.

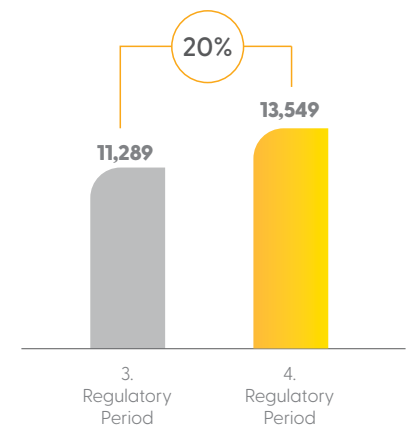
Comparison of Initial CAPEX Allowance
(TL million - Oct 2020 CPI (487.38))



3rd Regulatory Period CAPEX Allowance
(TL million - Oct 2020 CPI (487.38))



Comparison of Total CAPEX Allowance*
(TL million - Oct 2020 CPI (487.38))

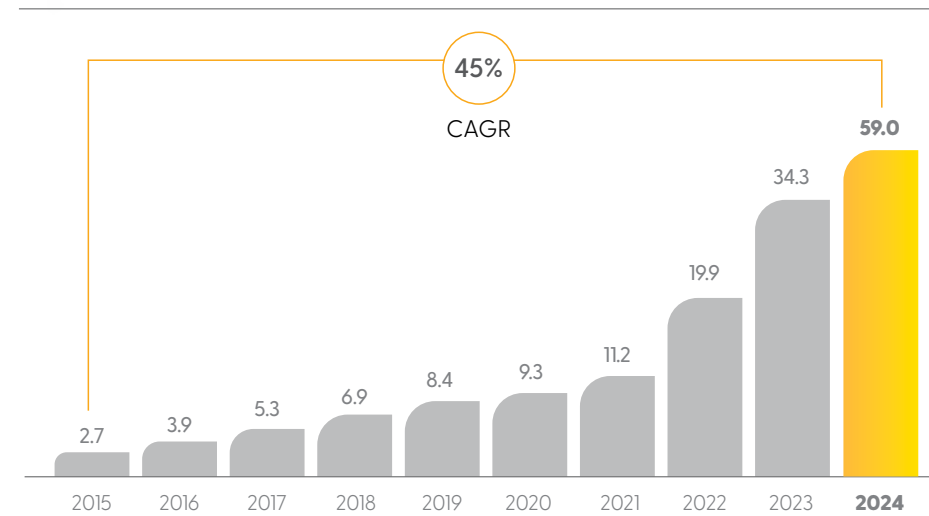


*There is no additional CAPEX allowance for the 4th regulatory period yet.

DISTRIBUTION

As a result of the investments made, the Regulated Asset Base reached TL 59.0 billion as of the end of 2024.

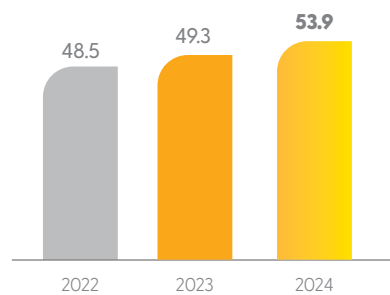
REGULATED ASSET BASE (TL BILLION)



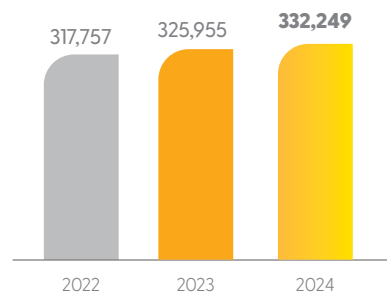
AYEDAŞ 18% Toroslar 42% Başkent 40%

GRID DEVELOPMENT

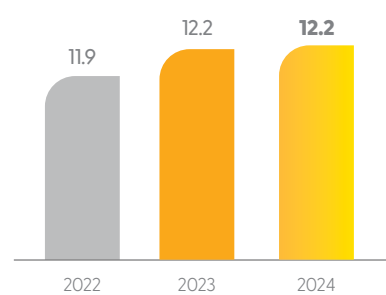
Total Distributed Gross Electricity (TWh)



Total Length of Network (km)



Number of Connections (million)



EFFICIENCY AND QUALITY PARAMETERS

In the Turkish electricity sector, there is a legislative structure that supports efficiency, service quality and the reduction of theft-loss rate for distribution companies. In this context, the prominent efficiency and quality parameters are as follows:

CAPEX Outperformance: By the end of a tariff year, if a distribution company realizes its mandated investments at a cost less than the unit prices determined by the EMRA, then it will have its revenues based on CAPEX realization calculated with the unit prices set by the EMRA. In this case, the Company retains the difference.

OPEX Outperformance: As per current regulatory framework, the fixed and variable OPEX component is not subject to adjustment based on realizations and it is possible to

achieve OPEX outperformance through efficient processes, cost management and digitalization. In case of outperformance, the Company retains the difference.

Theft-Loss Outperformance: Except for those consumers connected directly to the transmission network, all eligible and ineligible customers pay the theft-loss tariff. Distribution companies are obliged to procure energy to compensate for energy theft-loss. The theft-loss tariff is determined at the national level, and the revenue imbalances between the distribution regions are corrected through the price equalization mechanism. In this way, the cost burden calculated based on the theft-loss target does not fall on the consumers in a specific region alone but is distributed across all consumers in the country. If the performance of distribution companies is below the target, the Company retains the difference, and if it is above the target, it bears the cost.

Quality Parameters: EMRA applies quality parameters to the revenue requirement (excluding non-controllable OPEX and including scheduled maintenance) to incentivize the performance of companies with regard to continuity of supply, technical quality, customer satisfaction, transparency, corporate governance and occupational health and safety.

Additional Income: Additional income is retained by distribution companies based on predetermined ratios and the rest is deducted from revenue cap. The following revenues are retained by distribution companies as additional income:

- 55% of detected and invoiced theft usage accrual,
- 50% of actual theft usage accruals after legal proceedings,
- Maintenance and repair service revenues (75%), advertisement and rent revenues (50%), consultancy revenues (75%), AMR (75%), litigative income (50%) etc.



DISTRIBUTION

Enerjisa Enerji places a high priority on diversifying customer communication channels to meet present needs.

CUSTOMER EXPERIENCE AND CALL CENTRE

CUSTOMER EXPERIENCE

Maximising customer experience is a top priority for Enerjisa Enerji. The Company consistently engages in a wide array of activities, with the goal of fostering a customer-oriented approach across all operational units and elevating the quality of services provided to customers. To enhance the customer experience, Enerjisa Enerji's Distribution Companies have introduced innovative applications and embark on new investments in this domain.

Enerjisa Enerji places a high priority on diversifying customer communication channels to meet today's needs. The Company actively works to promptly address customer requests and complaints through these channels, aiming to provide the most suitable solutions to its customers.

Communication Channels

Enerjisa Enerji customers may submit their applications and complaints to the Company through various channels such as petitions, e-mail, phone, website, mobile application (Mobil 186), registered e-mail (REM), social media platforms (Twitter, Facebook, Instagram, LinkedIn), corporate Sikayetvar.com account, WhatsApp Support Line, and Chatbot.

Information shared through these channels is logged and subsequently passed on to the operational units. The response received from the operational units is shared with the customer through the preferred communication channel of the latter. In accordance with the Personal Data Protection

Law (PDPL), customers approve the clarification text through the distribution websites, WhatsApp Support Line, Chatbot application and mobile application channels. Additionally, data masking is applied on Call Centre screens.



CUSTOMER COMMUNICATION CHANNELS

	Call Centre	Mobile App	Social Media	Petition	E-mail	Website	WhatsApp Support Line	Chatbot
Meter Reading	√	√	√	√	√	√	√	√
Meter Operations	√	√	√	√	√	√	√	√
Disconnect/ Reconnect	√	√	√	√	√	√	√	√
Failure Related Outages	√	√	√	√	√	√	√	√
Damage Claim	√			√	√	√	√	√
Lighting Failure	√	√	√	√	√	√	√	√
Electricity Theft	√			√	√	√	√	√
New Connection	√	√	√	√	√	√	√	√

CALL CENTRE

Putting customer satisfaction at the core of its high-quality service principle, Enerjisa Enerji manages the sector's largest call operations with a team of approximately 800 staff in the distribution business line. The Call Centre, accessible at 186, provides uninterrupted 24/7 communication between the Company and its customers.

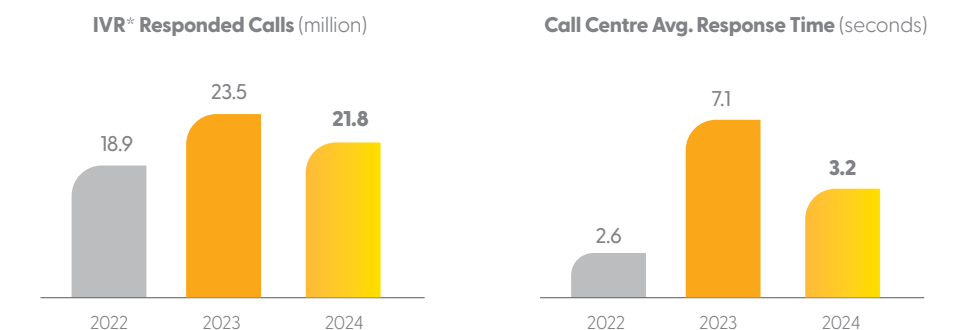
Customer complaints and Call Centre performance are treated among crucial quality parameters by Energy Market Regulatory Authority (EMRA). In this context, a better performance compared to the predetermined target provides a financial return over the revenue requirement of distribution tariffs.

Enerjisa Enerji meticulously analyses all customer requests and complaints, and works to improve its operational processes in this area.

Based on continuous channel- and process-based measurements, the Company makes a detailed analysis of issues where there is a scope for improvement, and takes the necessary remedial measures to boost customer satisfaction.

Enerjisa Enerji Distribution Companies received around 21.8 million calls through the Call Centre in 2024. The response rate for these calls was 98.9% with a service level score of 95.4%, and an average call response time of 3.2 seconds.

RESPONDED CALLS AND RESPONSE TIMES



* IVR: Interactive Voice Response

DISTRIBUTION

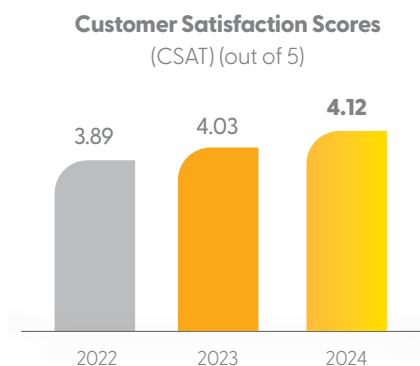
Enerjisa Enerji carries out customer satisfaction surveys on a regular basis to evaluate and enhance customer experience at the communication channels.

Customer Satisfaction

Enerjisa Enerji manages customer satisfaction and communication with customers in line with its internal policies and international standards. The Company delivers services at global standards within the scope of the ISO 10002 Customer Satisfaction Management System, which is internalized by all employees. To this end, Enerjisa Enerji provided training to more than 5,000 employees on customer orientation and customer satisfaction in 2024.

Enerjisa Enerji carries out customer satisfaction surveys on a regular basis to evaluate and enhance customer experience at the communication channels.

Customer Satisfaction Scores (CSAT) for 2021,2022,2023 and 2024 are provided below:



Recognizing communication as an important priority towards bolstering customer satisfaction, Enerjisa Enerji communicates with its customers through diversified channels. The Company, while raising the diversity of the communication channels to address customer needs on the one hand, constantly improves them on the other to ensure prompt problem and complaint resolution.

Developments in 2024

In 2024, Enerjisa Enerji's Distribution Companies executed the following projects to raise customer satisfaction within the scope of digitalisation.

From IVR to Digital

During peak times at the 186 call centre, customers with a high likelihood of waiting are redirected to digital channels.

186 Campus

The 186 Campus offers a living space where call centre customer representatives can benefit from innovative and digital solutions, as well as monitor training and quality processes.

Digital Announcement Management

Real-time and planned power outages are managed digitally through a program based on address selection, replacing manual processes. It ensures

a fast and error-free announcement process using professionally recorded voices.

Digital Application Form

The Digital Application Form was introduced to replace printed request forms used in physical channels, aiming to enhance customer satisfaction. Additionally, it has served as a good practice example within the scope of project sustainability. As of February 28, 2024, approximately 50,000 applications have been recorded digitally instead of using physical forms through the Digital Application Form.

WhatsApp - Chatbot Integration

With this project, customers who contact us via our WhatsApp lines will now be greeted by our ChatVolt bot. ChatVolt will provide fast and practical solutions to our customers on all matters. Through our new WhatsApp ChatVolt bot, customers can easily: Check for power outages and planned interruptions, Submit requests for faults and lighting malfunctions (using detailed address, installation information, or location sharing via WhatsApp), Access detailed information about their applications submitted through all channels. Additionally, ChatVolt will guide our customers with carefully prepared informational and directional content for other request categories.



Customer Relations and Experience Group Management Dashboard

Thanks to our dashboard created with the Power BI system, our Customer Experience, Customer Relations and Digital Channels and Call Centre reporting can now be monitored more easily and effectively. From the Customer Experience Dashboard screens, it is possible to compare our regional scores for AYEDAŞ, Başkent EDAŞ and Toroslar EDAŞ, as well as the scores in the province-district breakdown and of our operational and digital channels. In addition, the Customer Relations and Digital

Channels dashboards show the number of customer applications and its answer success rate by year and region, employee performances and the digital channel usage rates, while the Call Centre dashboard shows call centre statistics.

Kaizen Award: At the Quality Circles Sharing Conference, held annually by the Turkish Quality Association, our Ayedaş Zen Kaizen team won the Kaizen Award with its Digital Channel Utilization Project.

The websites of Enerjisa's Distribution Companies, which provide fast and immediate solutions according to customers' needs based on analyses conducted with a focus on customer satisfaction, are the most preferred digital solution among all other digital channels of Başkent EDAŞ, AYEDAŞ and Toroslar EDAŞ with 5.1 million visitors and more than 700,000 applications per year.

The A.C.E Award: Achievement in Customer Excellence Awards for outstanding customer satisfaction have been organized by Şikayetvar since 2015. This award recognizes and honors the brands in Türkiye that achieve the highest levels of customer satisfaction.

During a prestigious ceremony attended by top executives shaping the business world, national and international brands that excel in customer experience management across 60 different categories are awarded.

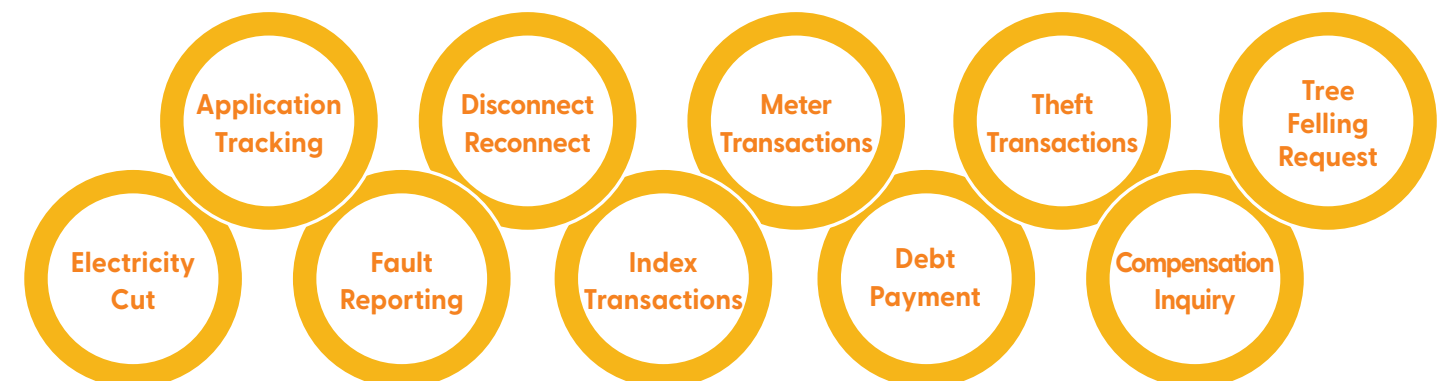
The Customer Experience Index is created based on more than 1.5 million customer satisfaction surveys conducted by Şikayetvar throughout the year. Award winners are determined according to the calculations based on this index.

The evaluation is conducted based on the following criteria:

- Response speed
- Complaint rate
- Resolution speed
- Satisfaction level
- Thank-you rate
- Churn avoidance rate (brand preference retention)

We are proud to receive the Silver Award and will continue our commitment to excellence in customer satisfaction.

ONLINE TRANSACTIONS





DISTRIBUTION

Enerjisa Enerji implements a technology-focused and effective network management with the goal of providing uninterrupted electricity.

TECHNOLOGY AND GRID MANAGEMENT

One of Enerjisa Enerji's primary objectives is to provide an uninterrupted and accessible energy supply with the solutions it develops by closely monitoring technological developments. The Company implements a technology-focused and effective network management with the goal of providing uninterrupted electricity. Enerjisa Enerji's Distribution Companies use the following systems in their operations:

- The Outage Management System (OMS) is used for outage management. In addition, customer notices received from the CRM system are conveyed directly in the OMS.
- SCADA (Supervisory Control and Data Acquisition), which is an industrial automation control system that remotely monitors supply continuity, is used to collect outage

data. The total number of sensors in the SCADA system, which was 1,299,239 at the end of 2023, reached 1,352,318 by the end of 2024.

- In addition, outage information is received from the Lighting and Customer Automatic Metre Reading System (AMRS). The AMRS installations have continued for remote readings of metres in distribution regions. The total number of installations within the scope of AMRS increased from 102,498 as of the end of 2023 to 134,005 by the end of 2024. (It is expected to increase by another 6,000 units by the end of the year.)
- Our current electricity network is processed in the GIS application, and customers affected by outages can be identified through GIS.

In line with the outage information received from all of these systems, the location of the outage is estimated through the use of various algorithms,

which, in turn, reduces outage response times. Enerjisa Enerji Distribution Companies use industrial tablets to record the procedures performed in the field during power outages. All system integrations ensure the correct calculation of the start and end times of outages in operating regions, as well as the number of affected subscribers.

Grid Quality Metrics

With the new tariff period, which started as of 2021, 'The Procedures and Principles Regarding the Consideration of Planned Maintenance Expenditures of the Electricity Distribution Companies in Tariff Calculations' entered into effect. In this context, a new framework was defined for planned maintenance to improve the continuity of supply and support the increase in customer satisfaction; a new OPEX allowance was introduced for planned maintenance. With this practice, the maintenance work of distribution companies has been stepped up with

an increase in the number of power cuts applied for maintenance purposes when compared with the previous years. Intensive maintenance work is aimed at reducing the incidence of failure in the grid and reducing the frequency of outages in upcoming years.

Despite the various adversities mentioned below, there has been an improvement in the SAIDI and SAIFI indices in 2024 compared to the previous year.

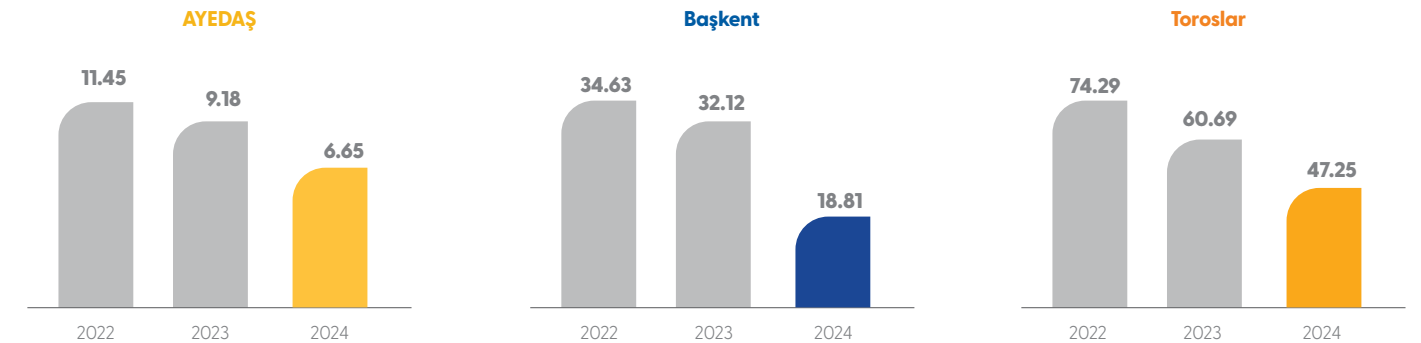
- In the Başkent Region, disasters resulting from adverse weather conditions such as storms, heavy snowfall and similar events that occurred in the Ankara, Kırıkkale, Çankırı, and Kastamonu provinces in April 2024.

Enerjisa Enerji carries out projects and investments to facilitate adaptation to the potential impacts of climate change as part of its sustainability strategy. For example, the overhead lines in distribution networks are more

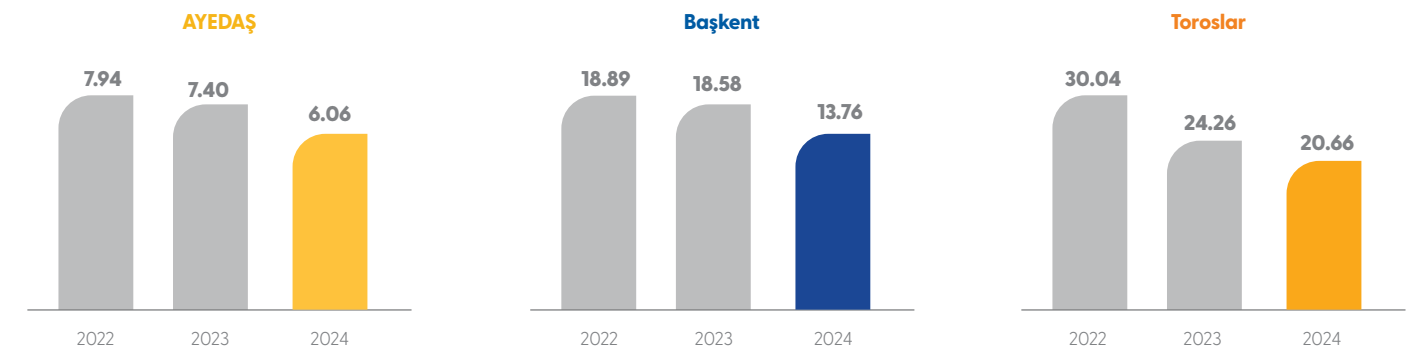
exposed to the impacts of natural disasters than underground cables. The ratio of underground cables increased from 19% in 2015 to 28.5% in 2024 in the Enerjisa distribution regions, mitigating the impact of external factors on the distribution network.

The System Average Interruption Duration Index (SAIDI) and System Average Frequency Index (SAIFI) are used to monitor grid quality in terms of continuity of supply.

SYSTEM AVERAGE INTERRUPTION DURATION INDEX (SAIDI) (HOURS) (Calculated based on the first 10 months of data reported to EMRA.)



SYSTEM AVERAGE FREQUENCY INDEX (SAIFI) (NUMBER OF POWER OUTAGES) (Calculated based on the first 10 months of data reported to EMRA.)





DISTRIBUTION

Enerjisa Enerji provides added value in many fields with its energy, technology, and network management projects.

Technology and Grid Management Projects

Enerjisa Enerji presses ahead with its grid investments to provide an uninterrupted supply of power and makes extensive use of technology.

Projects	Scope	Impact Area
The Tablet User Experience Project	The four-phase project aims to facilitate the use of tablets by field operators to reduce erroneous data entry and resolve problems they may encounter.	Stakeholder Management Customer Experience Digitalisation Quality Occupational Health and Safety (OHS)
Communication Device Follow-Up Project	By ensuring the integration of OSOS, which are distribution assets, into the grid connection model, it is aimed to accelerate fault point detection and save workforce by increasing the ability of supply continuity remote monitoring systems to accurately detect the interruption point.	Stakeholder Management Asset Management Quality
Establishing the OGSS-KYS System	Purpose of the Project: Verifying TSUIS (outage notifications that are within the scope of remote reading in the field and received from certain points with the help of devices) notifications received from communication devices in the field and including them in the Outage Management System, integrating the received CRM (failure notifications from customers) notifications, using the outage prediction algorithm for these failures coming from the field, to ensure that it is created according to notifications and reported to users and public institutions (EPDK, TEDAŞ, EPIAŞ). Additionally, it is aimed to reconcile meter outage data to increase the outage accuracy rate.	Stakeholder Management Quality
Hazardous Situation Management System	Stablishing a new system for hazardous situation management	Customer Experience Occupational Health and Safety (OHS) Quality
Maintenance Captain Project	With this project; The aim is to be able to control the maintenance carried out on the network inventories from the maintenance captains' tablets, to follow them in detail in the newly developed web application with GIS infrastructure, to develop new SAP reporting screens and to take before and after photos on the tablets.	Stakeholder Management Digitalisation Quality
Disaster and Emergency Communication Radio System Project	Following the earthquake that occurred in 11 provinces on 06.02.2023, there were interruptions in communication and data traffic due to physical damage and loads on GSM infrastructures. This situation partially disrupted the electricity distribution field coordination. The collapse of communication at the exact moment when it is important for crisis disaster situations poses a significant risk for field operations. Within the scope of the project, vehicle radios will be installed in all AOB and Maintenance vehicles. Solar panel trailer type communication stations and radio transmitter stations were supplied.	Communication Digitalization Quality Safety (OHS)
SCADA Infrastructure and Adaptation Projects	With these projects, infrastructure and extension works were carried out in the centres within the scope in question and the relevant centres were added to the SCADA system. By replacing the relays that had completed their technological life, the feeders were made remotely monitorable and controllable.	Stakeholder Management Digitalization Quality OHS
BAŞKENT SCADA System Renewal Project	The software, hardware and all licenses that constitute the architecture of the current SCADA system, whose technological lifespan has expired (10 years), will be supplied and installed. Approximately three thousand stations that are monitored and controlled by the system will be transferred to the new system and tested. Data flow to other applications such as OMS, CBS, TFI has been provided for the system to be installed.	Stakeholder Management Digitalization
Peak SCADA Projects	With the project, low voltage (LV) transformer information will be obtained from transformer centres where Pole Top Transformers are located. Necessary infrastructure and extension works have been carried out in the centres to obtain this information. The received LV information has been transferred to the Internet of Things Platform.	Stakeholder Management Digitalization Quality OHS
Maintenance and Contractor Teams Integration Project to Video Confirmation System	The necessary infrastructure and development work has been carried out for the existing video confirmation system for the contractor and maintenance teams.	Communication Digitalization Quality Safety (OHS)

Projects	Scope	Impact Area
Unmanned Aerial Vehicle Supply	With this project, operational efficiency is ensured by the use of unmanned aerial vehicles, in fault search, maintenance and disaster processes in the network and the risk of work accidents that may occur during direct line and connection controls is minimized.	Digitalization OHS
Digitalization and Renewal of Relay Team Computers	When occurred a fault in the grid, relay teams use their computers to disconnect faulty lines and equipment from the network within the time specified in the relay coordination time setting. Thus, customers in areas where there is no fault are not affected by these outages. Grid reliability is increased by renewing relay teams' computers and increasing their numbers.	Stakeholder Management Customer Experience Digitalization Quality
Digital Inventory Management System and Analysis	The aim of the project is to render grid management more secure. With the Modelling and simulation software, protection and coordination functions are transferred to the digital environment. The software allows the examination of voltage and current frequency anomalies through digital modelling with the power quality and harmonic analysis modules. Thanks to the protection module, relay coordination analysis can be performed. With GIS integration, GIS data can be used by modelling the network without the need for manual network drawing.	Digitalization Quality
Digital Inventory Management System and Analysis (Modelling and Simulation Software) - GIS Integration	GIS data and error reports will be automatically obtained through the created interface, and protection analysis studies will be able to be performed in software. Both up-to-date data will be obtained and time will be saved.	Digitalization Quality
Overhead Line Fault Indicator Mechanisms	Overhead Line Fault Indicator Mechanisms are devices which locate the fault occurring on the line, thanks to the light signal they emit. These devices contribute to customer satisfaction by shortening the time for the team to locate the fault, thus shortening the outage time.	Customer Experience OHS
Recloser Devices	Recloser devices enable automatic reclosing in case of temporary faults occurring in the grid. In this way, the duration of the power outage can be reduced to 30 seconds without intervention from the team. Thus, long outage durations will be minimized and the SAIDI and the SAIFI values will be reduced.	Stakeholder Management Customer Experience
Rotorecord (Automatic Retrieval of Fault Records from Protection Relays)	When a fault occurs in the grid, protection relays keep fault records. These records are examined by relay/protection engineers and necessary actions and improvements are taken to the field. Before the project, records were taken manually from the field by relay teams. Thanks to the project, it is shot automatically remotely, without the need for teams to go to the field.	Digitalization Customer Experience Stakeholder Management OHS
Faulty Opening (at the same time) and Faulty Opening (at the wrong location) Reporting	In case of faults in the grid, faulty opening (at the same time) and faulty opening (at the wrong location) feeder trips fed from the same source are reported. The feeder opening data detected with this report are examined by relay/protection engineers and the necessary actions and improvements are taken to the field. Thanks to this automatic report, faulty opening (at the same time) and faulty opening (at the wrong location) occurring in the field will be prevented.	Digitalization Customer Experience Stakeholder Management OHS
The TEİAŞ Feeder Monitoring and Improvement Project	The project is aimed at monitoring output feeder data (current, voltage, power etc.) and the location information of circuit breakers and disconnectors and the like at the TEİAŞ substations with the application software, and to integrate these data into the SCADA and Inavitas systems. In addition, demand tracking of the TEİAŞ substations and TEİAŞ feeder openings can be monitored instantly through the Inavitas system.	Stakeholder Management Digitalization Quality OHS
Reactive Power Compensation Systems Project	The aim of the project is to ensure that the reactive energy supplied to or withdrawn from the system remains within the limits specified in the Electricity Grid Regulation and to prevent possible reactive penalty exceedances, which are defined as violations in the penalty conditions section of the System Usage Agreements signed with TEİAŞ. Thanks to the project, user and inventory protection can be provided with closed system automation software designed with OHS measures in mind, and SCADA integration can be easily achieved. In addition, inventories (capacitor banks and shunt reactors) suitable for changing network conditions are quickly adapted, and in case of changes in the supply type that may occur in the system, a rapid evaluation and compensation can be made under remote load, via SCADA, with an OLTC (on-load tap changer) suitable for the power value needed. facilities can be maneuvered.	Stakeholder Management Digitalization Quality OHS
Grid Management System (GMS)- Technical Quality Management Project	It is aimed to carry out technical quality management in a timely, proactive and higher quality manner with user-friendly design, reporting ability, workforce gain, time saving, system stabilization, ability to respond to regulatory needs.	Stakeholder Management Customer Experience Digitalization Quality
Grid Management System (GMS)	Grid Management System, designed to collect and monitor all grid processes on a single system, includes pages covering Transformer/Feeder/DM/IM/TM Load Monitoring, Demand & Reactive Power Analysis, TEİAŞ Trip Monitoring, Alarm Management and other grid processes. With user-friendly screens and targeted analysis & reporting, workforce gains and time savings will be achieved; dependency on TEİAŞ and other licensed software will be reduced.	Stakeholder Management Customer Experience Digitalization Quality
Crane Remote Control Start-Stop System	In crane operations in the field, the operator must get in and out of the vehicle every time he needs to stop the vehicle. In this case, stopping the vehicle can be avoided. With this system, the vehicle can be controlled remotely and the vehicle can be started and stopped by start-stop when necessary, without leaving the vehicle.	OHS Sustainability Operational Efficiency
Safe Transportation Process Standardization	To guide lifting and carrying operations. These activities aim to ensure application standardization. 1) Increasing occupational safety and environmental awareness in operations. 2) Elimination of uncertainties regarding the work machines and equipment to be used in operations. 3) Ending differences in carrying out operations between different regions or personnel and ensuring standards	OHS Operational Efficiency

RETAIL SALES

In the retail energy sales sector, Enerjisa Enerji is the **industry leader** in terms of sales volume and number of customers.

Enerjisa Enerji has a 22% market share in the retail electricity sales sector in terms of the number of customers as of year-end 2024.

Enerjisa Enerji retail companies operate in three regions as the incumbent retail companies in the regulated electricity market, under the supply license issued by the Energy Market Regulatory Authority (EMRA).

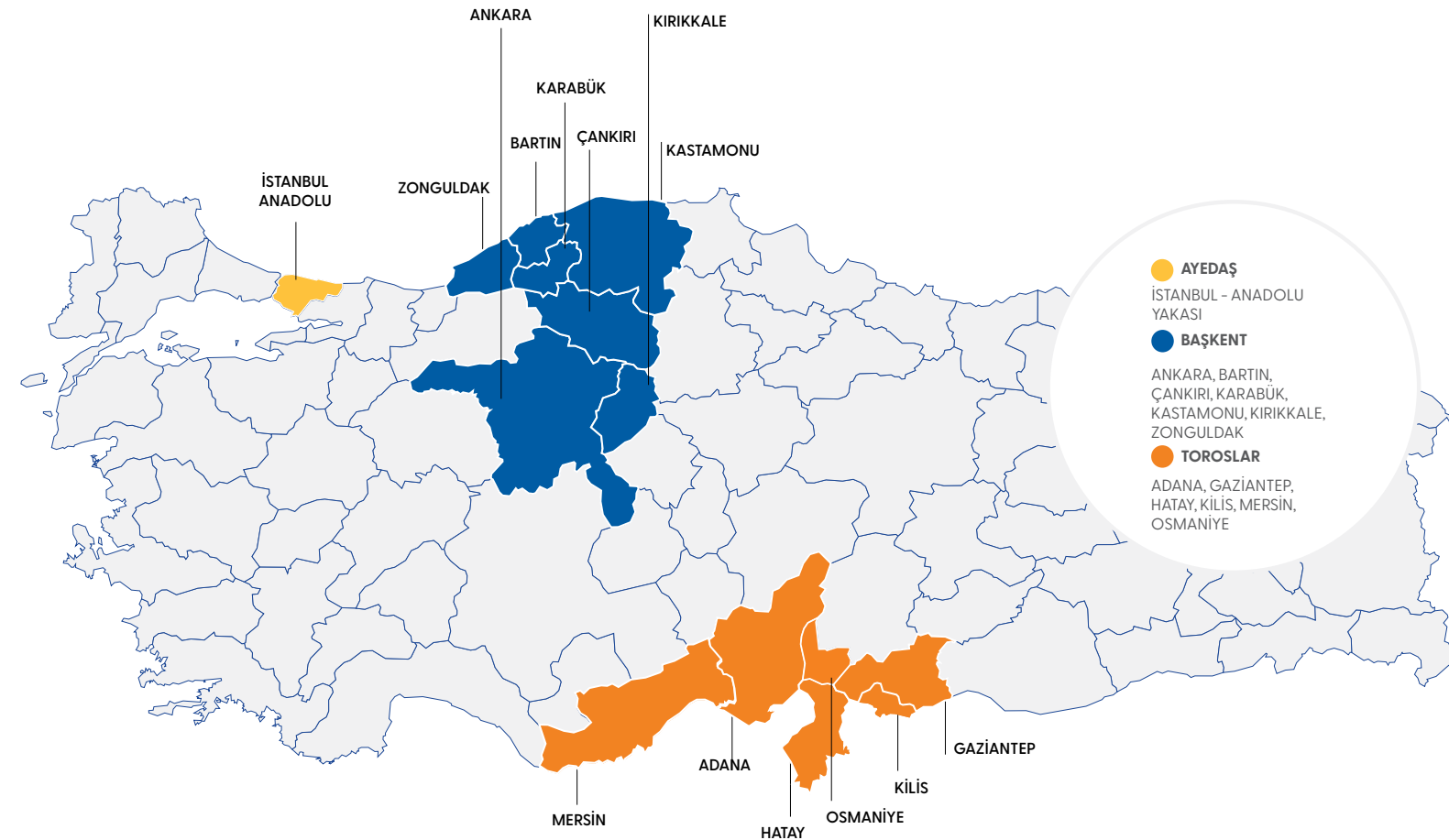
As incumbent retail companies, these companies provide electricity retail sales services to customers below the eligible consumer limit as well as consumers above the eligible limit but who have not chosen a different supplier, in the Company's distribution regions. Furthermore, these companies may sell electricity to eligible customers in their own regions as well as other parts of Türkiye with no regional restrictions.

Enerjisa Enerji develops its products and services with a focus on sustainability and provides cutting-edge technology to its consumers. The Company implements a wide range of innovations aimed at increasing customer satisfaction through customer-oriented digitalization projects.

The customer-oriented business approach adopted by Enerjisa Enerji is directly reflected in its wide range of service channels and after-sales service network. Providing services to approximately 10.7 million customers and a population of 22 million through the physical, digital and remote channels, Enerjisa Enerji strives to meet the needs of its customers, create value in electricity supply and provide aftersales support.

The main service channels used by Enerjisa Enerji are as follows:

- **Physical Channels:** Customers services are provided through physical channels including 35 Enerjisa Customer Service Centres, 67 Enerjisa Transaction Centres and 1 Mobile Service Vehicle.
- **Digital Channels:** Customer transactions are executed through digital service channels, which were redesigned to meet the needs of customers. Digital channels include the Online Service Centre, the internet, mobile platforms and e-Government.
- **Remote Channels:** 24/7 uninterrupted services are provided remotely through the Call Centre, while the tele sales services have also been actively provided.



RETAIL SALES COMPANIES

Enerjisa Enerji carries out regulated electricity retail activities in 14 provinces across three regions through Enerjisa Başkent Elektrik Perakende Satış A.Ş., Enerjisa İstanbul Anadolu Yakası Elektrik Perakende Satış A.Ş. and Enerjisa Toroslar Elektrik Perakende Satış A.Ş.

BAŞKENT ELEKTRİK PERAKENDE SATIŞ A.Ş.

Enerjisa Başkent Elektrik Perakende Satış A.Ş. was established and started its operations in 2014. Enerjisa Başkent Elektrik Perakende Satış A.Ş., serves approximately 4.1 million predominantly residential and commercial customers in the Başkent Region (Ankara, Bartın, Çankırı, Karabük, Kastamonu, Kırıkkale and Zonguldak), where the Company is the incumbent electricity supplier. These

companies are the incumbent electricity retail companies in their own regions in the regulated market. However, they also sell electricity in the rest of the country in the liberalized market.

İSTANBUL ANADOLU YAKASI ELEKTRİK PERAKENDE SATIŞ A.Ş.

Under the privatization program, the transfer of Enerjisa İstanbul Anadolu Yakası Elektrik Perakende Satış A.Ş. shares to Enerjisa Enerji were completed on July 31, 2013, with the signing of share transfer agreement. Enerjisa İstanbul Anadolu Yakası Elektrik Perakende Satış A.Ş. provides services to approximately 2.7 million predominantly residential and commercial customers on the Anatolian Side of İstanbul, where the Company is the incumbent electricity supplier.

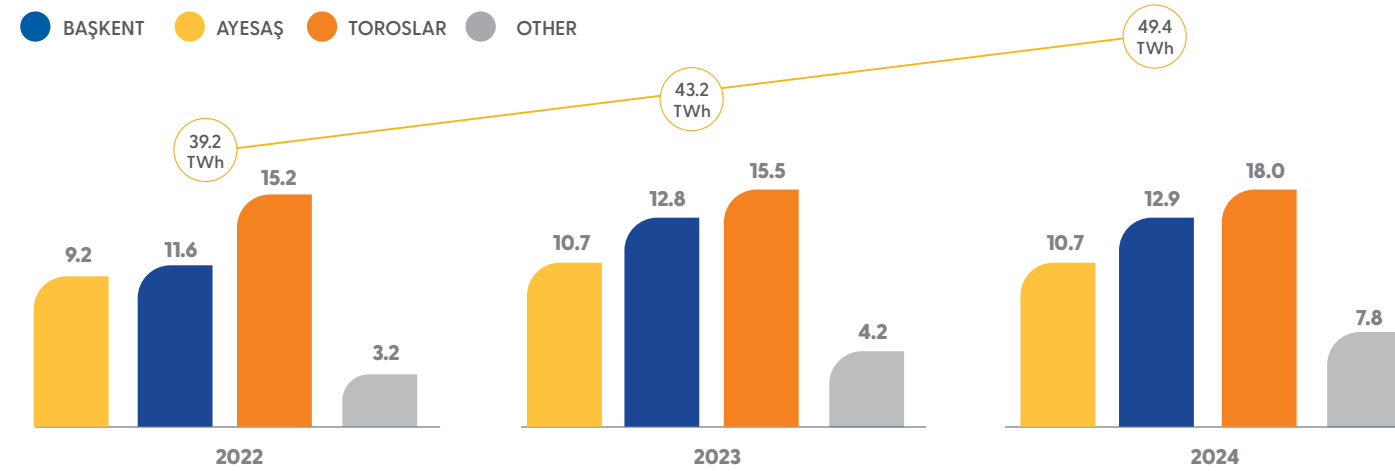
TOROSLAR ELEKTRİK PERAKENDE SATIŞ A.Ş.

The transfer of Enerjisa Toroslar Elektrik Perakende Satış A.Ş. shares to Enerjisa Enerji under the privatization program was completed on September 30, 2013, with the signing of the share transfer agreement. Enerjisa Toroslar Elektrik Perakende Satış A.Ş. serves approximately 4 million predominantly residential and commercial customers in the Toroslar Region (Adana, Gaziantep, Hatay, Kilis, Mersin and Osmaniye) where the Company is the incumbent electricity supplier.

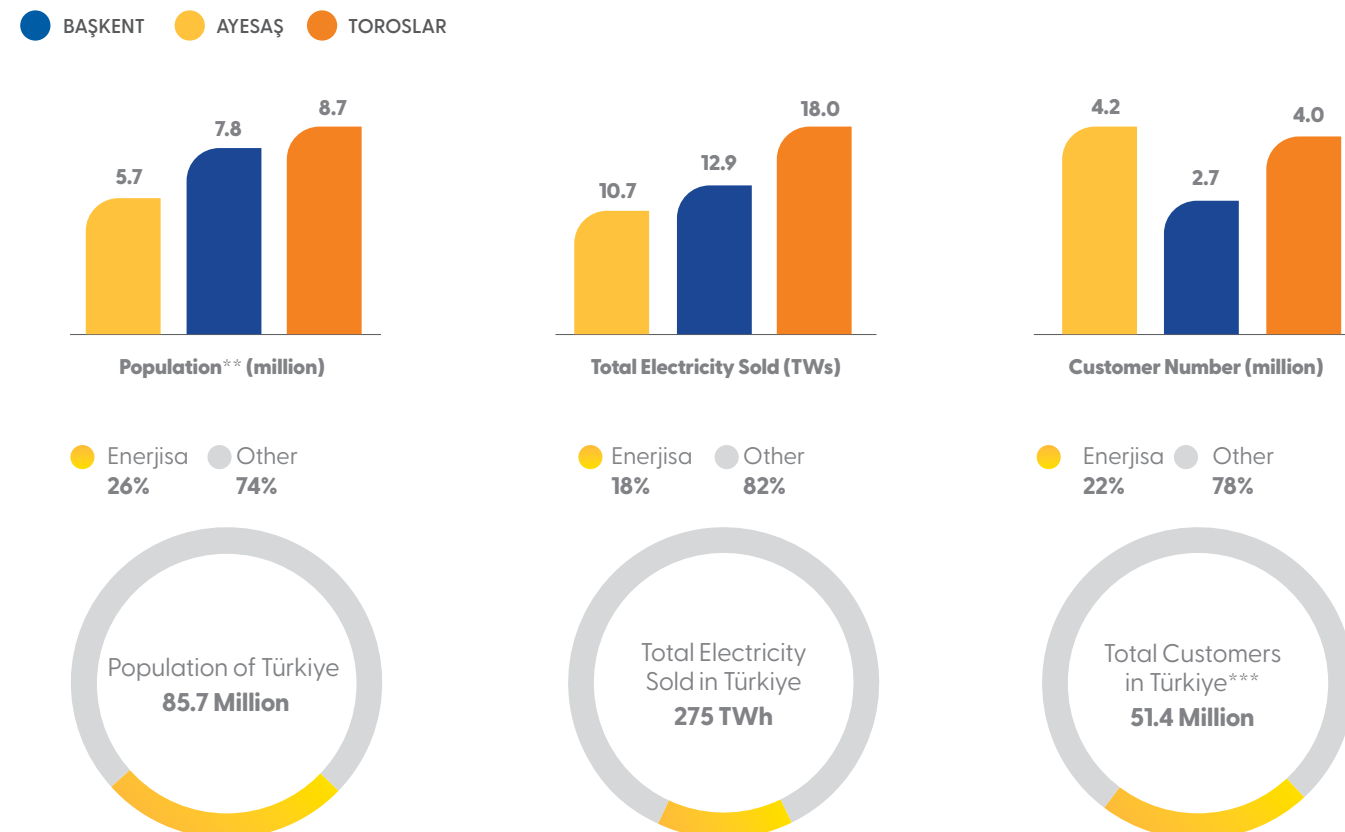
Within the scope of its retail sales activities, Enerjisa Enerji continued to develop its products and services with a focus on sustainability and to realize customer-oriented digitalization projects in 2024 as well.

RETAIL SALES

RETAIL SALES COMPANIES IN NUMBERS SALES VOLUME BY REGIONS* (TWh)



RETAIL SALES COMPANIES IN NUMBERS ENERJISA ENERJİ – 2024



* Sales volume includes the liberalised and nonliberalised sales in the three regions where the sales company has the status of the assigned supplier and the liberalised market sales in the other regions.
 ** TÜRKSTAT
 *** EPIAŞ transparency platform

CONSUMER LIMITS AND APPLIED TARIFFS IN THE ELECTRICITY MARKET

Consumption Volume (kWh/year)* and Customer Type	Eligible Consumer Right Exercise Status	Tariff Applied	Supplier
0-750 kWh/year	Noneligible Consumers No right to choose a supplier	National (Regulated) Tariff (Compulsory)	Incumbent Electricity Retail Company
Residential ≥ 750 kWh/year and <5,000 kWh/year Agricultural Activities ≥ 750 kWh/year and <100 million kWh/year	Eligible Consumer The right to choose a supplier has not been exercised.	National Tariff	Incumbent Electricity Retail Company
Other (Public, Exclusive Services Sector, Industrial, Lighting) ≥ 750 kWh/year and <15,000 kWh/year	Eligible Consumer The right to choose a supplier has been exercised.	Eligible Consumer Tariff	Incumbent Electricity Retail Company or Other Suppliers
Residential ≥ 5,000 kWh/year Agricultural Activities ≥ 100 million kWh/year	Eligible Consumer The right to choose a supplier has not been exercised.	Last Resource Tariff Energy Costs (including FIT) x 1.05 for residential & 1,0938 for other groups	Incumbent Electricity Retail Company
Other (Public, Exclusive Services Sector, Industrial, Lighting) ≥15,000 kWh/year	Eligible Consumer The right to choose a supplier has been exercised.	Eligible Consumer Tariff	Incumbent Electricity Retail Company or Other Suppliers

Free consumer limit as of 01.01.2025 and Last Resort Supply Tariff limit as of 01.02.2025

RETAIL SALES

DEFINED STRATEGY BASED ON CUSTOMER SEGMENTS

MASS

Residential*

(Regulated + Liberalized)

- Regulated or those who continue to purchase electricity at the regulated tariff due to their tariff structure, even though exceeding the eligibility limit,
- Wide customer base and diverse customer needs,
- Service and support need through different channels.

SME

(Regulated + Liberalized)

- Due to the tariff structure, a shift to liberalized SME who are above the eligibility limit,
- Wide customer base and diverse customer needs,
- Service and support need through different channels.

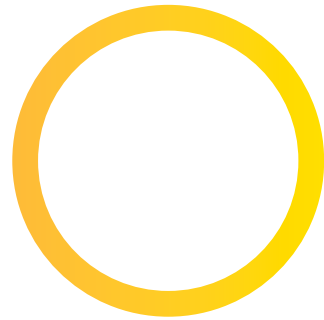
CORPORATE

(Regulated + Liberalized)

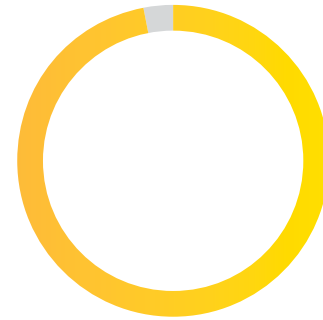
- Commercial or industrial customers above eligibility limit and with high consumption,
- Customer oriented solution and customized service need.

* Households (detached buildings, apartments, sites), common areas and non-commercial (associations, foundations, places of worship, etc.)

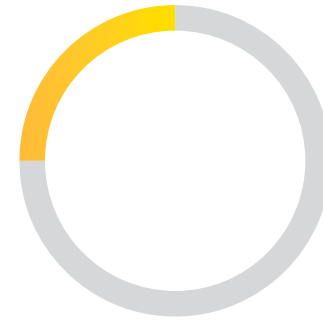
● Liberalized 0% ● Regulated 100%



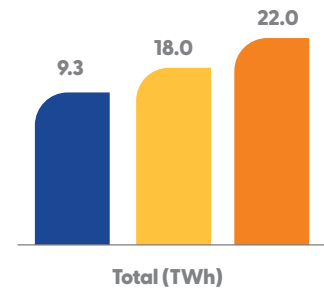
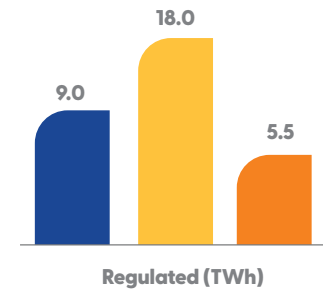
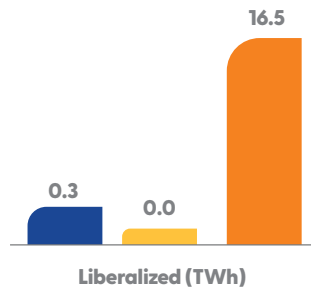
● Liberalized 3% ● Regulated 97%



● Liberalized 75% ● Regulated 25%



● SME ● RESIDENTIAL ● CORPORATE



RETAIL SALES

Enerjisa Enerji structures its products and services in two groups, electrical and non-electrical, and manages this structure in accordance with the different expectations and needs of individual and corporate customer segments.

PRODUCTS, TARIFFS AND SERVICES

Enerjisa Enerji structures its products and services in two groups, electrical and non-electrical, and manages this structure in accordance with the different expectations and needs of individual and corporate customer segments.

Enerjisa Enerji's individual customer segment consists of residences and small-scale businesses. The company prepares periodic campaigns for this segment and offers the most advantageous offers to its customers, taking into account the developments in the sector.

Enerjisa Enerji aims to offer solutions that touch different points in the lives of its customers with non-electrical products. Various advantages are provided to customers in different sectors.

Enerjisa Enerji's approach in the corporate segment is to offer commercial products with fixed and variable prices to meet the expectations and needs of its corporate customers. In addition to electricity sales, end-to-end solutions to increase the energy efficiency of corporate customers and reduce carbon emissions, and detailed information is provided under the "Customer Solutions" section.

	Customer Type			
	Mass		Corporate	
Electricity Tariffs	Residential	SME	Commercial and Industrial Medium-Sized Customers	Commercial and Industrial Large and Special Customers
National Tariff	✓	✓	✓	✓
Fixed Tariff	✓	✓	✓	✓
Standard Tariff		✓		
National Tariff Indexed Tariff		✓	✓	✓
Dinamic Tariff	✓	✓	✓	✓
Green Energy Tariff			✓	✓

PRODUCTS AND TARIFFS

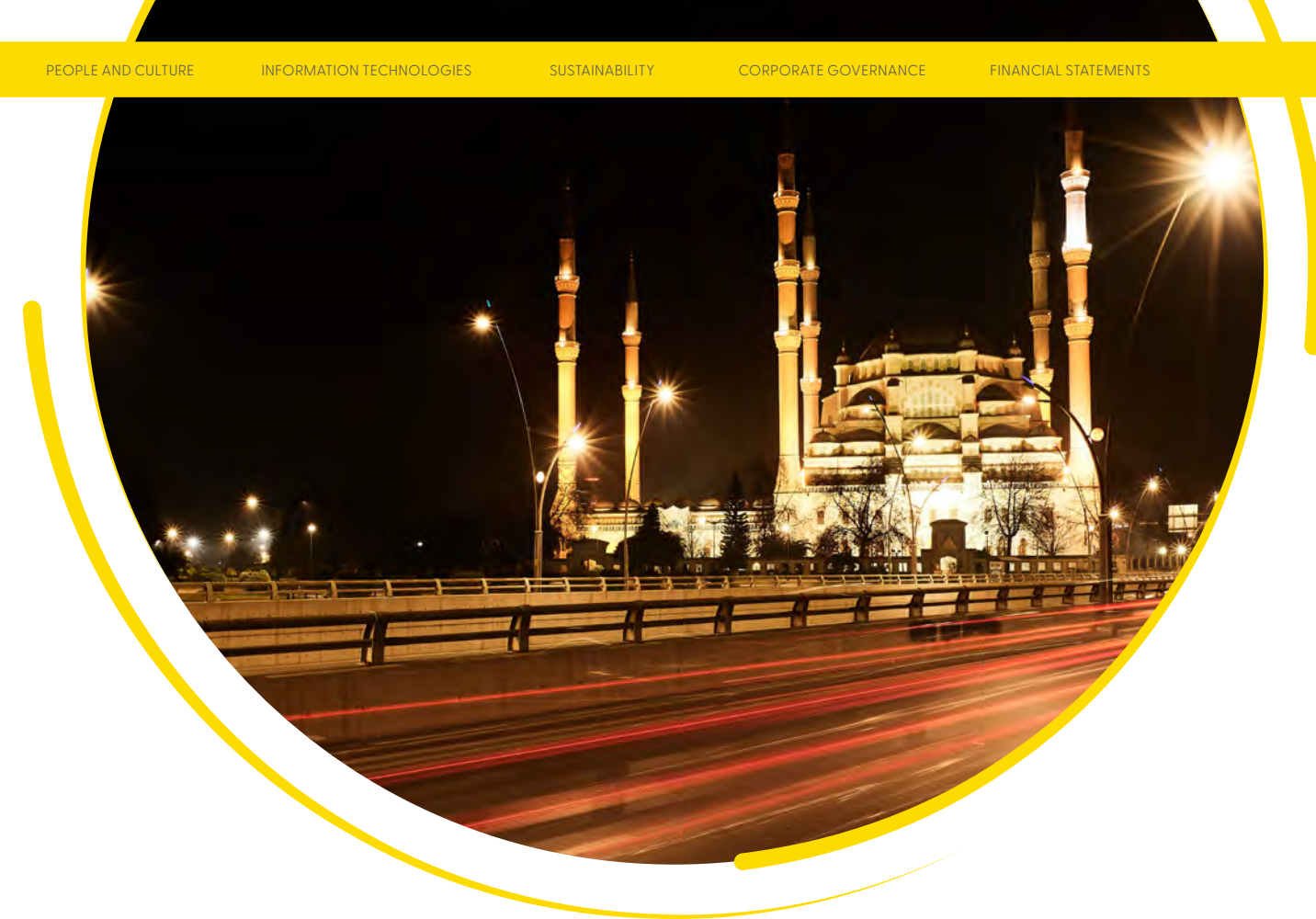
The products and tariffs offered by Enerjisa Enerji with different commercial options, including dynamic, fixed, prepaid and post-paid options, are shown below.

- **National Tariff:** This refers to the tariff announced by the EMRA quarterly, which is applicable to eligible consumers who do not exercise their eligibility rights or end-users whose consumption is below the eligible consumer limit.
- **Standard Tariff:** The price set for retail customers is variable with defined conditions and requires no commitment.
- **National Tariff Indexed Tariff:** This is a product offered at a discount over national tariff prices. When national tariff prices decrease or increase, electricity supply continues by applying a fixed discount rate.
- **Fixed Tariff:** It is a product with a fixed unit price that is not affected by the costs in the energy market and changes that may occur in the national tariff during the contract period. More advantageous price options are offered with different prepayment terms.
- **Dinamic Tariff:** This product is indexed to the cost of energy supply. The unit price varies according to changes in market costs throughout the contract period. More cost-effective pricing options are provided with different prepayment terms.
- **Green Energy Products:** Green energy is a type of energy produced from renewable energy sources, certified by internationally recognized accredited organizations and transparently reported. Enerjisa Enerji customers can reduce or neutralize greenhouse gas emissions resulting from their electricity consumption with two types of certificates.

• **Renewable (Green) Energy Certificate:** A market-based instrument that represents the property rights of the environmental, social and other non-power attributes of renewable electricity production. It refers to the Renewable Energy Certificate showing that 1 MWh of electricity is produced from a renewable energy source and delivered to the electricity grid.

• **Carbon Reduction Certificate:** It is a type of loan that belongs to a real or legal person (belonging to a business/power plant producing from renewable energy), is standardized, tradable and is expressed in metric tons of CO₂.

In addition, corporate segment customers are also offered options to create their own tariffs by combining different tariffs in order to manage their financial risks.



RETAIL SALES

In 2024, important steps were taken to maximize customers' experiences in digital channels and to continue the increase in usage of the channels.

SERVICE CHANNELS

Enerjisa Enerji diversifies its channel and service structure for an excellent customer experience, while also producing projects that will ensure the most efficient use of resources.

Physical Channels

Adopting a customer-oriented approach in its services, Enerjisa Enerji aspires to provide its consumers with the best experience through physical channels. These channels, which handled approximately 1.2 million transactions in 2024, and the services they offer are listed below:

In addition to the mentioned physical channels, as assigned incumbent electricity retail companies, customer-oriented sales activities are carried out

for corporate customers with a total of 15 corporate dealers in 13 different provinces in order to sell electricity to eligible consumers in other regions of Türkiye in addition to the regions where the Company operates. Corporate customers are visited at their own locations through energy professionals who are experts in their fields, and solutions tailored to their needs and preferences are provided.

Digital Channels

In 2024, Enerjisa Enerji continued its efforts to elevate its digital channels, focusing on customer satisfaction, digital transformation, and sustainability. This year, as in previous years, was not only about meeting our customers' energy needs but also marked a period in which we implemented projects aimed at promoting environmental sustainability

and reaching everyone. Enerjisa's vision for digitalization continues to guide the steps to be taken in the future to meet our customers' expectations.

Throughout 2024, significant progress was made to enhance the convenience of conducting transactions on digital channels and to strengthen our digitalization strategies. Our customers can perform a wide range of transactions, such as creating memberships, initiating or cancelling subscriptions, making payments, scheduling appointments, viewing bills, tracking consumption, and submitting applications, 24/7 via online.enerjisa.com.tr, the Enerjisa Mobile app, and the e-Government platform, without needing to visit physical locations. In this context, our digital platforms were visited by 6.4 million users in 2024, providing service through a total of 19 million online sessions and 98 million page views.

Key services such as initiating and cancelling subscriptions were carried out quickly and easily from the comfort of our customers' homes, totalling 438,632 transactions. Over 1 million payments were made through our digital channels. Additionally, 166,120 appointments were scheduled via our digital channels to enable faster service at physical locations. Through these platforms, our customers submitted 144,017 requests and inquiries related to their subscriptions or specific needs.

Customer Service Centre	Enerjisa Transaction Centre
<p>Enerjisa Enerji serves its customers with 35 Customer Service Centres (CSC) in 3 regions. The transactions carried out in the Customer Service Centres are as follows:</p> <ul style="list-style-type: none"> Application transactions Subscription and termination transactions Billing transactions Information update transactions Permission/request management transactions Tariff change transactions Security deposit refund/inquiry request transactions <p>Furthermore, the Company serves its customers at Enerjisa Transaction Centres in the Başkent and Toroslar Regions and with 1 mobile service vehicle (Mobile CSCs) at remote locations where there are no Customer Service Centres.</p>	<p>Enerjisa Enerji serves its customers with 67 Enerjisa Transaction Centres (ETC) in 3 regions.</p> <p>Most transactions carried out in customer service centres can also be carried out by contracted Enerjisa Transaction Centres.</p>

Online Services Centre & Enerjisa Mobile

The following operations are carried out through the Online Service Centre and Enerjisa Mobile:

- Subscription
- Termination of Subscription
- Online membership
- Monitoring energy consumption transactions
 - Monitoring energy consumption trend
 - Consumption comparison graphs
 - Tracking annual consumption data
- Billing viewing and payment transactions
- Tariff change transactions
- Application transactions
- Permission request management transactions
- Information update transactions
- Appointment transactions
- Eligible consumer application
- Carbon footprint calculation

e- Government

Enerjisa Enerji customers may perform the following transactions through the e-Government portal:

- Subscription
- Termination of Subscription
- Debt information inquiries
- Payment information inquiries
- Payment transactions
- Services specific to legal entities:**
 - Debt information inquiries
 - Payment information inquiries
- Services specific to heirs:**
 - Subscription cancellation
 - Debt information inquiries
 - Payment information inquiries

REMOTE CHANNELS

Call Centre

Call Centre With around 200 staff, Enerjisa Enerji's Call Centre represents an important channel for the Company. Managing a wide range of customer traffic, this channel offers the following services:

- Contract Transactions
- Billing Transactions
- Payment Transactions
- Eligible Customer Transactions
- Information Update
- Appointment Transactions
- Technical Support
- Operations Support Transactions

The Call Centre received a total of approximately 3,4 million calls in 2024, 36% of which were handled by the voice response system, with 99.90% of the 2.1 million queued-up calls answered. The average response time of the Call Centre was 3 seconds. Billing transactions were the most frequent application subject with 46%, while subscription transactions took the second place with 17%.

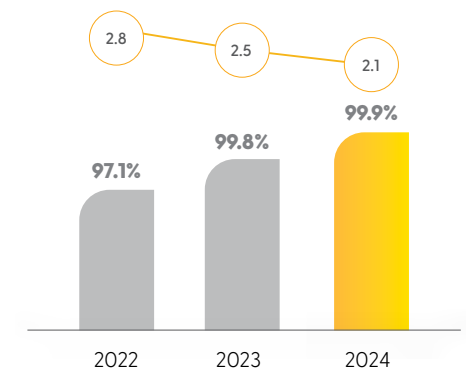
In addition to calling our customers who gave low scores in the Customer Satisfaction Surveys, it is aimed to ensure the continuity of the quality service

provided by calling our customers who gave high scores in 2024. Customers who made repeated calls to the Call Centre during the day were called back, and their dissatisfaction and deficiencies in the processes were identified and improved. While customers waiting in the call centre queue who hung up were contacted back, our response rate, already over 99%, was brought closer to 100%, ensuring contact with all our customers.

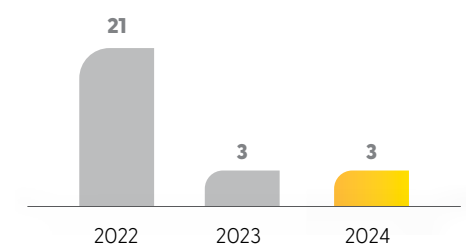
In addition to the subscription/ unsubscription and appointment transactions currently provided via IVR, the effects of congestion have been tried to be eliminated by transmitting process information via SMS. In addition to these developments, if customers calling the Call Centre have a receivable, it is instantly detected by the voice response system and the calls are resolved in IVR without connecting to a customer representative.

Also, customers who do not have E-archive approval can receive their invoices via E-Mail / Instead of paper invoices. It is possible to give approval on IVR to receive it via SMS.

Number of Queued-up Calls (million) and Response Rate (%)



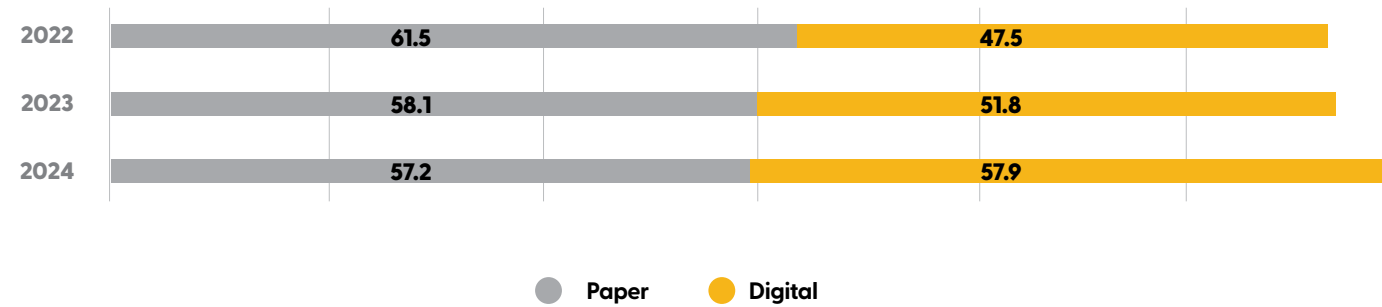
Call Response Speed (seconds)



RETAIL SALES

Enerjisa Enerji aims to enable customers to access their invoices instantly by switching to digital invoices and, accordingly, contribute to the protection of the environment by using less paper.

NUMBER OF PAPER & DIGITAL BILLS (MILLION)



Sales Volume

The total sales volume reached 49.4 TWs in 2024, compared to 43.2 TWs in 2023. In 2024, there was an increase in energy demand in the segments that Enerjisa Enerji focused on as part of its profitable growth strategy.

Billing

In 2024, the total invoice volume reached approximately 115 million. Depending on customers' preferences, 52.7 million invoices were sent as e-archives, and 5.2 million invoices were sent as e-invoices.

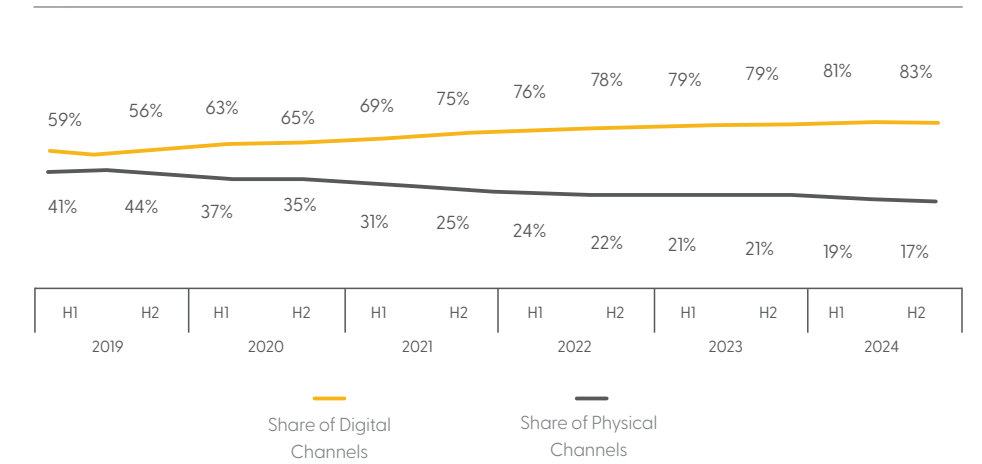
Enerjisa Enerji aims to enable customers to access their invoices instantly by switching to digital invoices and, accordingly, contribute to the protection of the environment by using less paper. With the increase in the digital invoice ratio in the total invoice over the years, we have saved 1,507 trees and avoided the use of 84 tonnes of paper in 2024.

Payments

Due to the digitalization trend and the impact of digital solutions offered to customers, the share of digital channels in bill payments has been increasing since 2019. With the effect of technological developments and the increasing digitalization trend, the volume increase in our digital payment channels has become permanent, as transactions are made easier and faster.

The share of digital payments in terms of units has increased to over 83% by the end of 2024.

PROGRESSION OF SHARE OF DIGITAL AND PHYSICAL CHANNELS: 2019-2024



RETAIL SALES

Since its establishment, Enerjisa Enerji has always prioritized customer satisfaction and service quality in its investments and strategies.

CUSTOMER SOLUTION CENTRE & CUSTOMER EXPERIENCE

CUSTOMER SOLUTION CENTRE

After reviewing customer applications, Enerjisa Enerji Customer Solution Centre produces solutions in cooperation with the relevant department and transmits the explanation about the solution to the Solution Centre through the system. The Solution Centre organizes this explanation and presents it to the customer in a format that the customer can forward through the channel customer prefers.

In 2024, the "Legal Case" project was launched with the aim of streamlining the process of obtaining legal unit opinions when necessary during the review of customer applications. This allows for presenting and receiving feedback within the same system, without losing the application reference number, to prepare and deliver a customer response seamlessly.

Another initiative, the "Digital Assistant" project, also went live in 2024. This project enables the receipt of customer applications via an interactive voice response (IVR) system, their analysis through robotic processes, and the delivery of responses back to customers via the same IVR system.

With both projects, it is aimed to develop, improve and digitalize the various stages of the application receiving and responding operation carried out by the Solution Centre.

In 2024, the Solution Centre received 268 thousand applications to be monitored and to be responded to. Of these applications, 99.25% were responded to within the targeted time frame. On average, the applications were completed in 2.3 business days.

CUSTOMER EXPERIENCE

The importance of "Customer Experience" as a concept is increasing at a pace in parallel with changing customer needs and behaviours. Since its establishment, Enerjisa Enerji has always prioritized customer satisfaction and service quality in its investments and strategies.

Placing its customers at the heart of its business model, Enerjisa Enerji develops exclusive services and products compatible with the digitalized world. The Company aims to provide the best service in energy supply by continuously improving these products and services.

Enerjisa Enerji has integrated customer satisfaction management into its internal policies and implements the ISO 10002 Customer Satisfaction Management System. Employees are trained under ISO 10002 standards to respond to customer expectations in the most efficient and effective way possible.

Customer Experience teams of Enerjisa Enerji work in cooperation with internal stakeholders and customers to improve the interactions between customers and the Company. Before every improvement, the Company first receives feedback from its customer service employees and takes opinions of its customers by using research methods such as surveys and focus group studies, which can clearly reveal customer expectations. Relevant actions are planned according to the feedbacks.

Enerjisa Enerji manages customer experience through five key journeys, each with its own scope:

- **Sales Journey:** Within this journey, Enerjisa Enerji develops journey maps covering the entire sales process, including pre-sales preparations across all sales channels, providing information via different platforms, portfolio registration, and issuing invoices for free consumers. The company also plans actions to enhance service quality during the sales process and improve the overall procedure. Measuring customer satisfaction at every step of the journey, sharing the results with relevant teams, and working to improve these metrics are among the core responsibilities of the Customer Experience teams.



- **Relocation Journey:** This journey focuses on mapping the customer's experience during subscription processes and planning actions to improve processes based on customer needs and expectations. Cross-functional teams collaborate on projects to implement experience-enhancing actions. Customer satisfaction results are monitored at all stages of the journey and shared with relevant functions.
- **Application and Request Management Journey:** This journey involves creating maps of the steps required to handle customer requests and complaints, including their submission, tracking, resolution, and communication of the outcome back to the customer. Improvement actions for these steps are planned and executed in collaboration with cross-functional teams. Periodic and ad-hoc market research activities, as well as the management and responsibility of satisfaction measurement systems, are also included in this journey.
- **From Meter to Payment Journey:** In this journey, Enerjisa Enerji conducts various analyses and studies, starting from the moment customers' electricity meters are read up to the point of achieving customer satisfaction. The steps include invoice generation, payment reminders,

payment processes, and mapping customer experiences for situations such as non-payment, contract termination, and legal proceedings. Identifying actions to enhance the customer experience and improving satisfaction metrics are key focus areas of this journey.

- **Corporate Customer Experience Journey:** This journey encompasses the creation of journey maps for both electricity and non-electricity services in collaboration with cross-functional teams. The company aims to establish the necessary infrastructure to measure corporate customers' experiences, map their journeys, identify areas for improvement, and implement enhancement initiatives.

Enerjisa Enerji implements experience and process designs in every project which touches the customer. As part of its attempts to improve the customer experience the Company concentrated on digitalization and segment-based service strategies in 2024, and these efforts had a positive impact on customer satisfaction. In this regard, Enerjisa Enerji's customer experience vision has served as a guiding principle in projects aimed at transferring all transactions performed by our individual and corporate customers in physical channels to digital platforms and improving the user experience on these digital channels.

CUSTOMER SATISFACTION MEASUREMENT

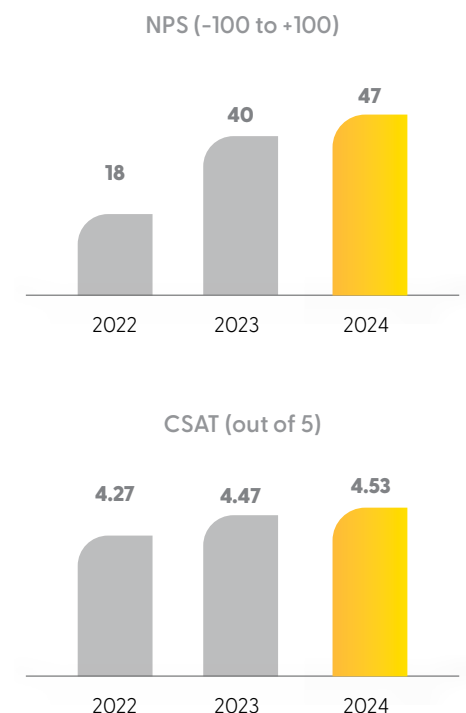
Customer satisfaction is measured regularly at Enerjisa Enerji. The results of the monthly quantitative Customer Satisfaction Score (CSAT) and the Net Promoter Score (NPS) are shared with all stakeholders by the Customer Experience Committee, which consists of the senior management.

In 2018, Enerjisa Enerji implemented an end-to-end customer satisfaction model. Satisfaction is measured based on customer journeys, and in 2024, real-time customer satisfaction tracking was conducted across 47 customer touchpoints.

In 2024, the customer experience measurement system collected feedback from over 660,000 customers annually. Based on these measurements, the results were analyzed, priority issues were identified and turned into projects, and improvements were made in processes involving customer interactions.

The Net Promoter Score (NPS) is measured by an independent research company, reaching over 24,000 customers annually.

Thanks to initiatives launched to enhance customer experience, both the Customer Satisfaction Survey and NPS satisfaction levels have shown an upward trend in 2024. The NPS score increased by 17% compared to the previous year, reaching 47 in 2024.



RETAIL SALES

Enerjisa Enerji remains committed to addressing not only today's challenges but also the needs of the future.

CUSTOMER-ORIENTED PROJECTS

Our digital channels achieved significant success in award programs throughout 2024. Prestigious recognitions such as the **Stevie® Awards, **TITAN Business Awards, **Brandon Hall Excellence Awards and **Globee® Awards reflect the acknowledgment of our efforts in digitalization and sustainability. Our customer-centric digital solutions have received positive feedback in areas ranging from accessibility to ease of use. These accolades reaffirm the value of Enerjisa's innovative applications developed to provide better services to our customers.

As Enerjisa Enerji, we remain committed to addressing not only today's challenges but also the needs of the future. Guided by our vision of digitalization, we will continue developing sustainable, eco-friendly solutions that make life easier for our customers and effectively meet their needs. In the coming years, we aim to further enhance our digital channels and create greater impact in the energy sector.

Awards Received in 2024:

- **Stevie® Awards for Sales & Customer Service**- Award for Innovation in Customer Service - All Other Industries Bronze Stevie® Award
- **TITAN Business Awards**- Business Website – Energy – Gold
- **Brandon Hall Excellence**- Future of Work Awards – Bronze
- **The Globee®**- Awards for Customer Excellence - GOLD GLOBEE® WINNER
- **BlindLook Eyebrand Award**
- **Gartner Eye on Innovation** - Power & Utilities – EMEA - Gold

Customer 360 Project

With the Customer 360 Project, all detailed information, applications, and requests of our customers were consolidated into a single interface. The implementation of this project has accelerated operational processes and increased customer satisfaction. The ability to quickly access customer information, perform detailed analyses of applications and account summaries, and manage sales data has streamlined many processes, significantly enhancing the first-contact resolution rate. The system, featuring user-friendly interfaces accessible via both mobile and web platforms, has contributed to operational excellence by saving time and reducing costs. The project's success was recognized with three prestigious awards at the TITAN Business Awards, which celebrate

innovation, leadership, and achievements. It was honoured with two Gold awards in the categories of Operational Management Solution and Business Management Platform, and a Platinum award in the category of Service Management Solutions, further cementing its excellence.

Söğütözü, Osmaniye, and Çukurova Customer Service Centres

A groundbreaking Customer Service Centre concept has been introduced, combining environmental consciousness, agility, intelligence, and interactivity. These centres feature an energy museum that sparks curiosity and exploration, offering visitors the opportunity to experience the synergy between technology and nature while taking them on an exciting journey through the world of energy.

The first examples of this innovative concept were launched at the Söğütözü and Osmaniye Customer Service Centres, followed by the Çukurova Customer Service Centre as the next iteration, offering enhanced services to customers.

With this new concept, the digitalization of Customer Service Centres has been encouraged to reduce paper waste, protect nature, and contribute to a sustainable world. Digital screens located within and around the centres provide customers with a modern and engaging experience.



Digital Assistant Project

For customers requesting a callback for their applications, robotic calls are made to ensure timely follow-up, enhancing customer satisfaction while avoiding quality compensation claims. This service has been operational since July and continues to deliver quick and efficient responses.

“Sen Koru” Project

In 2024, Enerjisa Enerji reinforced its environmental awareness and sustainability vision through the innovative “Sen Koru” project. This initiative allows Enerjisa Mobile users to calculate their carbon footprint and evaluate their environmental impact more consciously. Through “Sen Koru,” customers can track their carbon footprint by entering their daily activities into the system. This encourages them to better understand their environmental impact and adopt a more sustainable lifestyle.

The primary goal of the project is not only to help users measure their carbon footprint but also to provide them with a roadmap for taking practical steps to reduce it. This feature, offered through Enerjisa Mobile, promotes an environmentally conscious lifestyle while increasing individuals' motivation to contribute to a sustainable future. By raising awareness about the importance of carbon footprints, “Sen Koru” has empowered our customers to reshape their energy consumption habits in an eco-friendly manner.

Throughout 2024, the strong interest and active participation of our customers in this project led to a total of 3 million tons of carbon footprints being calculated via Enerjisa Mobile. This allowed our customers to evaluate the environmental impact of their behaviours with tangible data.

The “Sen Koru” project once again highlights Enerjisa's values as an innovative and responsible energy company. This sustainability-driven initiative addresses not only today's challenges but also aims to create a more livable world for future generations.

BlindLook Collaboration

Through our partnership with BlindLook, our digital channels have been made compatible with voice simulation technology, ensuring accessibility for our visually impaired customers. This collaboration allows easy access to Enerjisa's digital services. The BlindLook Eyebrand Award received in 2024 is a significant recognition of our efforts to become a more accessible brand through our digital channels.

RETAIL SALES

With the innovations made for a simpler and more user-friendly customer experience, transactions via Enerjisa Mobile App and the Online Service Centre have become easier than ever.

Voice Approval for Sales via IVR

For remote execution of Free Consumer agreements with individual segment customers, a process was implemented to obtain, store, and monitor customer approvals via IVR. This enhanced process not only supports digitalization and improves customer satisfaction but also makes a meaningful contribution to sustainability.

Opera - HyperAutomation Project

The OPERA (RPA) project leverages text mining techniques such as natural language processing, statistical analysis, and machine learning to manage 30% of customer complaints more efficiently. This project won first place in the EMEA region at the Gartner Eye on Innovation Awards, held for the first time for the Power & Utilities sector, among 128 participants.

360-Degree Digitalization

Aiming for full digitalization of business processes, the Enerjisa Mobile App was completely renewed. With the innovations made for a simpler and more user-friendly customer experience, transactions via Enerjisa Mobile App and the Online Service Centre have become easier than ever.

The Jet Kiosk application, designed to streamline subscription processes, reduced subscription times from 6 minutes to 3 minutes.

The Digital Ticket application, aimed at reducing paper use, was adopted by 1.2 million customers. This environmentally conscious initiative resulted in significant paper savings, showcasing Enerjisa's commitment to sustainability.

EPIAŞ & Auto Portfolio Project

For customers in our portfolio, a system was designed to monitor usage points based on different references, from the start of the contract until its expiration. EPIAŞ, contract, and system data for these usage points are automatically and synchronously checked at short intervals, enabling instant resolution of discrepancies. This approach has ensured operational excellence while eliminating potential customer dissatisfaction caused by errors, such as incorrect billing due to data inconsistencies.

Mobile Wallet

Enerjisa Mobile Wallet, which was completed in 2024 and is a first in our sector, is a payment method offered for Enerjisa electricity bill payment transactions. With the approach

of offering more innovations and opportunities to our customers every day, we have added another innovation to our mobile application. Enerjisa electricity bills can be paid with the balance loaded into Enerjisa Mobile Wallet, shopping can be done from contracted stores, Money Points can be earned from the shopping made and these Money Points can be used in bill payments.

Enerjik Flow

It is designed to shorten the transaction and waiting times in the entire end-to-end process and to ensure the highest level of customer satisfaction in the main steps of the customer journey in our physical channels; appointment, ticket purchase and subscription processes.

The changes we have made in the applications provide our customers with exemplary experiences that are a first in the sector.

In addition to the innovations and developments in all service steps; With the subscription agreement we reduced from 25 pages to 1 page, it has brought about a 50% decrease in the average waiting time in physical channels and a significant increase in customer satisfaction scores in parallel.



RETAIL SALES

The **total volume** of electricity supplied from renewable energy sources in 2024 reached **1,700,000 MWh**.

ENERGY MANAGEMENT

ENERGY MANAGEMENT AT ENERJISA ENERJİ

Enerjisa Enerji effectively manages the energy supply process, which is critical for financial sustainability. The company leads the market with its flexible product supply model, strong risk management policy, exemplary information technology infrastructure in the sector, and expert human resources.

The purpose of energy management at Enerjisa Enerji is to successfully carry out the entire energy supply process for the Company's retail sales portfolio (regulated and liberalised) and contribute to sustainable and predictable profitability by effectively managing the risks related to this process.

Enerjisa Enerji supplies the electricity needed for regulated market sales, primarily through Elektrik Üretim A.Ş. (EÜAŞ), while the remaining part of the capacity is offered by EÜAŞ from the day-ahead market. The company

meets the electrical energy needs for its liberalised consumer portfolio from the over-the-counter market, the day-ahead and intraday markets.

Enerjisa Enerji continued its efforts in 2024 to increase the number of active suppliers and product diversity, develop competitive supply strategies and create value by performing effective portfolio management.

SUPPLY OF GREEN ENERGY

Although Enerjisa Enerji supplies green energy to its customers, it also uses green energy in its headquarters buildings, customer service centres and distribution facilities.

Aiming to contribute to environmental sustainability, the Company began supplying and selling green energy certified by internationally accredited organisations in 2019.

Enerjisa Enerji has carried out work to supply its energy needs from power plants produced from renewable resources throughout 2024. The company has significantly increased its renewable portfolio volume and signed bilateral agreements for direct electricity supply from power plants produced from renewable energy sources. Through these agreements, the total volume of electricity supplied from renewable energy sources in 2024 reached 1,700,000 MWh.

In addition to the renewable energy supply, throughout 2024, Enerjisa Enerji sold 2,090,000 MWh of green energy certificates to customers in the free portfolio. Through these certificates, the Company has certified that it procures the energy it consumes in its facilities from renewable sources.

Enerjisa Enerji aims to provide some of the electricity that it will supply to its customers in the free market portfolio from renewable sources in 2025.



RISK MANAGEMENT

Enerjisa Enerji develops strategies to effectively manage risks arising from prices, consumption rates, counterparties, and regulations encountered during the supply process. These strategies and the risk management infrastructure aim to ensure sustainable profitability and preserve the value created through sales activities. Accordingly, the company manages its energy portfolios under control to withstand volatile market conditions through market monitoring and analytical risk models.

In 2024, actions taken to address the volatility in energy prices caused by exchange rate fluctuations became the primary focus of risk management. Within this framework, value at risk was managed through forward energy and currency contracts. Particularly during the first quarter, when predictability regarding exchange rates was limited, sensitivity analysis scenarios and active portfolio management principles enabled effective management of this challenging period.



CUSTOMER SOLUTIONS

Enerjisa Enerji attaches importance to meeting customer needs with sustainable and innovative solutions.

CUSTOMER SOLUTIONS

Enerjisa Customer Solutions Inc. was established in 2017 to deliver innovative and sustainable solutions that address our customers' needs and to carry out customer solutions operations.

In this context, since October 2020, Enerjisa Enerji has been offering end-to-end solutions to its corporate customers to source their energy consumption with the production from renewable energy sources and reduce carbon emissions by increasing energy efficiency under the roof of "The Energy of My Business" (İşimin Enerjisi).

Participants from both domestic and international regions were welcomed at various events, including the ICCI (International Energy and Environment Fair and Conference), Solarex (Istanbul International Solar Energy Technologies & Energy Storage Fair), the EIF 18th World Energy Congress and Fair, the TÜRKÇİMENTO 17th International Technical Seminar and Exhibition, the German-Turkish Chamber of Commerce and Industry (AHK Türkiye) Energy Efficiency Day, the Turkish Wind Energy Conference (TÜREK), and the IV Eurasian Cogeneration Conference. These events provided opportunities to showcase performance- and efficiency-focused products, such as renewable energy and energy efficiency applications.

Additionally, details about the solutions we offer under the "Energy for My Business" initiative were shared with participants and industry stakeholders at Türkiye's first Floating Solar Power Plant Summit. At the Future of Energy and Storage Congress, we presented our activities and projects in the field of energy storage.

Expanding beyond these activities, we also participated in youth gatherings at various universities and Retail Experience events to introduce Enerjisa and our work to young talents. These efforts aimed to attract new talent to both our company and the sector by sharing our experiences and activities.

THE ENERJISA CUSTOMER SOLUTIONS PRODUCT PORTFOLIO

Renewable Energy Solutions	Energy Efficiency Applications	Green Energy	Cogeneration and Trigeneration Solutions	E-mobility
<ul style="list-style-type: none"> · Solar Power Plants (SPP) · Wind Power Plants (WPP) · Energy Storage Solutions 	<ul style="list-style-type: none"> · Lighting Conversion Projects · Process Efficiency Projects 	<ul style="list-style-type: none"> · Renewable Energy Certificate · Carbon Reduction Certificate 	<ul style="list-style-type: none"> · Cogeneration Systems · Trigeneration Systems · Biomass Power Plants 	<ul style="list-style-type: none"> · Electric Vehicle Charging Stations and Systems

The Enerjisa Customer Solutions Dealers

Enerjisa Enerji sells solar renewable energy and energy efficiency applications in every region of Türkiye. In this context, energy solutions are offered to corporate customers through 7 dealers (Izmir, Diyarbakir, Konya, Istanbul, Nevşehir, Ankara) in 6 different cities.



RENEWABLE ENERGY SOLUTIONS

The use of renewable energy resources supports the effort to combat climate crisis both in Türkiye and around the world. Enerjisa Enerji contributes to the selection of renewable energy sources in order to take an active role in this struggle.

Solar Power Plants (SPP)

Enerjisa Enerji offers reliable solutions that considers specific requirements of its customers through innovative business and financial models in the field of solar power plants, where it deploys its financial and technical know-how.

Enerjisa Enerji Solar Power Plant (SPP) solutions, which can be applied to all industrial, commercial and public organizations and institutions, aim substantially to reduce investment burden of its customers.

Enerjisa Enerji's SPP activities consist of undertaking all financial costs for the power plant investment, carrying out the analysis and project stages, carrying out turnkey installation and acceptance procedures, and providing maintenance-repair services during the contract period.

In this context, in addition to administrative processes such as the permit and connection procedures, the Company provides professional engineering support, maintenance and repair services and performance, guarantee for the product during the contract period. It offers end-to-end integrated solutions including energy storage, electrical vehicle charging in accordance with requirements.

By the end of 2024, the total installed capacity of our solar power plants had reached 102.4 MWp. In 2024, work was actively carried out on 15 different projects with a total capacity of 116.9 MWp. Projects with a capacity of 72.9 MWp were commissioned, while installations for projects with a capacity of 23.3 MWp were completed, with administrative processes still ongoing.

In 2024, a 10.69 MWp Land SPP Construction and Maintenance Agreement was signed with Anadolu Efes for their Konya Çumra factory site. The land-based solar power plant is expected to reduce approximately 10,780 tons of CO₂ emissions annually.

CUSTOMER SOLUTIONS

Enerjisa Enerji provides the necessary solutions for energy transition in Türkiye under a single platform.

As part of sustainability goals and a social responsibility project, a 27 kWp rooftop solar power plant was installed and commissioned on the roof of the Karataş Fisheries Cooperative. With the start of electricity production from renewable energy, this project is expected to prevent 23 tons of CO₂ emissions annually.

Wind Power Plants (WPP)

As a solution partner in the field of wind energy, Enerjisa Enerji assumes investment and performance risks by creating a business model specific to the needs and goals of businesses. This ensures that businesses get the most benefit from wind energy.

Like any large-scale investment, WPP investments require a well-designed financial plan and cost-effective financial resources. Through our Energy Performance Contract (EPC) model, Enerjisa Enerji utilizes its financial strength to spare customers from the search for WPP investment financing. Thus, in the business model that we have collaboratively created, which considers the needs of our customers, long-term cooperation is offered, allowing them to fully benefit from the advantages of WPP installation.

WPP projects are executed by taking into consideration various factors, such as turbine type and placement, which are determined after detailed wind analyses, foundation selection suitable for the site, construction of on-site access roads, detailed logistics studies

for the transportation of equipment like blades and nacelles to the site and routes of electrical transmission lines. The most optimal solutions are provided with our energy performance-oriented approach during the project design and analysis phases. In 2024, we continue presenting our initial proposals for our WPP Solutions.

Energy Storage Solutions

The preliminary licenses for a total of five electricity production facilities with storage in the provinces of Ankara, Eskişehir and Çankırı, having a combined installed power of 287 MWp / 205 MWe / 256 MWh, as applied for by Enerjisa Müşteri Çözümleri A.Ş., have been approved by the Energy Market Regulatory Authority. Announcements regarding the mentioned applications and approvals were shared through the Public Disclosure Platform on December 26, 2022, August 10, 2023, and January 8, 2024, respectively.

Permission processes for obtaining licenses for five projects have been initiated and are being carried out within the legal deadlines.

ENERGY EFFICIENCY APPLICATIONS

Enerjisa Enerji develops customer-oriented alternative energy efficiency solutions. The Company offers energy efficiency applications with the energy performance contract model, particularly in the fields of waste heat recovery, heating, ventilation and air conditioning (HVAC), energy recovery from

biomass and biogas, pressurized systems, electric engines and lighting.

With this model Enerjisa Enerji performs energy audits of the facilities, offers solutions, designs and implements them. At the same time, by financing entire or a part of the investment, Enerjisa Enerji creates a payment model based on the anticipated savings within this model and guarantees the performance of the replaced equipment or the equipment modified to be efficient. Thus, a performance-guaranteed saving is achieved.

- **Lighting Conversion Projects:** Enerjisa Enerji aims to increase the energy efficiency of its customers through LED conversion projects. Within the scope of EPC model, the Company implemented the LED conversion of 48.634 fixtures with 46 projects as of the end of 2024. The projects carried out delivered a total of 12,763 MWh in energy savings, reducing CO₂ emissions by 7,083 tons.
- **Process Efficiency Projects:** Enerjisa Enerji signed a project with Brisa, a Sabancı Group company, in 2024 to efficiently use heat pumps in the system and add new chillers to the system for efficiency in space air conditioning at the company's Izmit facility. The project aims to save 6,754 MWh of electricity annually. The electricity to be saved thanks to the system is equivalent to the annual electricity consumption of approximately 2,200 households. This project aims to prevent approximately 3,005 tons of CO₂ emissions annually. The project is planned to be commissioned at the end of the first quarter of 2025.



COGENERATION AND TRIGENERATION SOLUTIONS

The efficiency offered by the Cogeneration (CHP-Combined heat and power) and Trigeneration (CCHP-Combined cooling, heat and power) systems, which are installed as turnkey projects, significantly reduces total energy costs. Carbon emissions are reduced as a result of the reduction in primary energy consumption. Enerjisa Enerji offers turnkey services for both systems, and presents financial solutions which will ease the investment burden on customers.

In this context, these solutions are provided with the Cogeneration and Trigeneration plants with a total installed capacity of 3.8 MWe at Sabancı University, Hilton Adana and Hilton Ankara locations. The efficiency achieved with these plants will prevent more than 30,000 tons of CO₂ emissions over the course of 10 years.

ENERGY MONITORING

Enerjisa Enerji becomes a 360-degree solution partner in the energy field by gathering customer requirements under one roof. Energy Monitoring & Management Platform (Platform) enables customers to monitor their businesses in real time at all stages from energy generation to consumption with Internet of Things (IoT) infrastructure and transform their data into information with advanced Artificial Intelligence (AI) methods.

Customers manage the energy consumed in their businesses that are located at one or more points via Platform. Consumptions can be monitored on a device basis, comparative reporting can be made between locations, and the control of energy expenses can be managed with preferences that can be customized according to location.

Enerjisa Enerji manages the entire process related to the Platform from beginning to end by analysing customers' requirements beginning with exploration visit to businesses, providing necessary equipment and software support and carrying out the installation and commissioning processes. The Company provides periodic maintenance and repair services for both equipment and software and stands by its customers throughout the entire contract period.

CUSTOMER SOLUTIONS

By the end of 2024, Eşarj has established itself as Türkiye's fastest electric vehicle charging station network, with more than 2,500 charging plugs, of which more than 1,900 are fast charging plugs, across more than 1,500 locations.

E-MOBILITY: EŞARJ

Enerjisa Enerji is committed to promoting the widespread use of electric and energy-efficient vehicles to contribute to a low-carbon ecosystem. To achieve this goal, the company actively explores innovative business opportunities, including electric vehicle charging stations, energy storage systems, smart home technologies, and systems that enable consumers to generate their own electricity.

In this context, Enerjisa Müşteri Çözümleri A.Ş. acquired 80% of Eşarj Elektrikli Araçlar Şarj Sistemleri A.Ş. (Eşarj) in 2018, becoming its majority shareholder. In December 2021, the company increased its stake from 80% to 94% by purchasing a 14% minority share, and by 2023, Eşarj became fully incorporated into Enerjisa.

Eşarj has developed a national charging station network and operating system, providing a wide range of charging solutions to customers nationwide. Eşarj's objectives include improving Türkiye's infrastructure quality, accelerating the transition to ultra-fast charging stations, and enhancing its contribution to green transformation through solar and battery-integrated systems.

By the end of 2024, Eşarj will operate 2,563 charging plugs across 1,508 locations, maintaining its position as Türkiye's first and fastest electric vehicle charging network. Additionally, all public charging stations utilize electricity certified by the Renewable Energy Resource Guarantee System (YEK-G), further supporting carbon emission reductions.

E-mobility Market:

As in other parts of the world, e-mobility market in Türkiye, which has revolutionized the automotive, fuel, and infrastructure industries, continues to grow rapidly. Before the COP26 United Nations Climate Summit in Glasgow, Türkiye committed to creating a carbon-neutral ecosystem by 2053. Another pledge was to ensure that all new cars and vans sold by 2040 would be zero-emission vehicles.

In line with these national goals, Türkiye's e-mobility market is expected to advance from an early development stage to a more mature market structure. By the end of 2024, the number of electric vehicles in Türkiye is projected to exceed 175,000, with exponential growth anticipated in

the coming years. The Energy Market Regulatory Authority forecasts more than 1.3 million electric vehicles on the roads by 2030.

Numerous domestic and international brands manufacture and sell 100% electric passenger cars, buses, minibuses, trucks, tractors, and boats in Türkiye. Future projections from these brands emphasize the importance of a robust and rapidly developing charging station infrastructure as a critical component of this transformation.

Eşarj's Goals:

- To provide customer-centric charging solutions nationwide through a national station network and operating system.
- To contribute to infrastructure development from technical, administrative, and regulatory perspectives.
- To supply a diverse range of charging units suitable for all needs.
- To install charging units at locations requested by customers and investors.

Eşarj's Vision:

- To lead Türkiye's transition to sustainable mobility by providing a widespread, reliable, and innovative EV charging network.
- To promote a cleaner and better future for everyone.

Eşarj's Mission:

- To offer innovative and eco-friendly electric vehicle charging solutions for a sustainable future.
- To continuously invest in technology and development, emphasizing renewable energy.
- To provide not just a service but also a reliable partnership for customers.
- As an Enerjisa brand, to accelerate Türkiye's EV transition and contribute energy to the future

Eşarj's Revenue Streams:

- Providing charging services to electric vehicle users at publicly operated Eşarj stations.
- Testing, training, commissioning, and installing home-type charging stations for individuals and businesses.
- Offering after-sales maintenance, repair, and technical support for both home and public/commercial charging stations.
- Developing software solutions and platforms to provide services to various industry players.

Key Developments in 2024:

Automotive Partnerships: Eşarj has partnered with brands like Peugeot, Opel, Mercedes, BMW, KIA, Tesla, BYD, MG, Suvmarket, and Volvo to provide charging credits. Customers received charging balances valid for 1, 2, or 3 years at public Eşarj stations, with packages worth up to 40,000 TL per vehicle. These partnerships significantly contributed to increasing Eşarj memberships and charging revenues.



Through its collaboration with BYD, one of the world's leading electric car manufacturers, Eşarj provided installations at dealer parking lots and tailored solutions such as wallboxes and charging credits for BYD customers. Public charging station installations for Toyota, Hyundai, and Brisa dealers are also ongoing.

Fuel Partnerships: Eşarj expanded its collaboration with Aytemiz in 2024 by adding new stations at additional fuel stations, bringing the total to 41 locations with 61 stations. Similarly, its partnership with Kadoil, initiated in 2024, resulted in 28 stations across 27 locations. Additionally, an agreement was signed with Termopet for further collaborations.

CUSTOMER SOLUTIONS

Eşarj aims to deliver customer-focused charging solutions nationwide through its extensive station network and operating system.



CarrefourSA Partnership: Eşarj strengthened its partnership with CarrefourSA by installing charging stations in supermarket parking lots. By the end of 2024, the number of collaboration locations reached 42, with a total of 60 stations.

Brisa Partnership: Eşarj increased the number of stations under its collaboration with Brisa to 74 nationwide, adding 12 new locations in 2024. Three existing stations were upgraded to high-power charging stations.

Retail Partnerships: Eşarj signed agreements with Medical Park Group for installations in 31 hospitals across Türkiye. Fast-charging station installations started during the year and 5 station installations were completed in 4 locations. MMT Hospitals added six stations across three locations under a master agreement. Collaboration

with the Bilkent Group resulted in installations for 27 stations across three major cities. Additionally, five Çetinkaya Group locations now host a total of 19 stations.

Fleet Partnerships: To increase usage of the Eşarj network, the fleet model was updated, and new agreements were made with 38 companies. Through the Fleet Portal project, firms such as Astra Zeneca, MINT, Bob Vale, Turkcell, and TEB Arval are expected to contribute significantly to charging revenues from their expanding fleets.

Apsiyon Partnership: Eşarj signed an intermediary agreement with Apsiyon to support limited-use AC installations in residential and housing projects. Special tariff offers are extended to customers through the Apsiyon channel, aiming to increase Eşarj's presence in such projects.

E-Kasko and Eşarj Collaboration: Eşarj members who purchase E-Kasko insurance from Aksigorta are eligible for a promo code providing a 10% discount on Eşarj services, valid until December 31, 2024.

Republic Day Campaign: Between October 26-29, 2024, Eşarj offered all customers a 29% discount on charging services at all locations, contributing to increased charging revenue.

Activation and Upsell Campaigns: Eşarj reactivated nearly 10,000 inactive customers (those who had not used the service for over two months) through targeted campaigns, generating an additional 4 million TL in revenue.

Upsell campaigns targeted active customers (those who charged at least once in the last two months) to increase their transaction amounts. These

campaigns attracted approximately 3,000 active users and generated nearly 1 million TL in additional revenue.

Decharge Point: Eşarj launched its first "Decharge Point" in Aydın Söke, offering a comfortable space for drivers to relax and spend quality time while their vehicles charge. Equipped with amenities such as TV, internet access, a coffee machine, and a children's play area, the facility is the first of its kind in the industry. Work is ongoing to open a second Decharge Point at another location.

Mobile Application Enhancements: Eşarj improved its mobile app to enhance customer loyalty and satisfaction, introducing features like coupon and campaign systems for loyalty discounts. The "Travel Planning" feature allows users to plan routes before their trips, while

the "AutoCharge" feature enables customers to start charging simply by plugging in the cable without additional steps. Post-charge surveys are also provided through the app for real-time feedback to improve the customer experience.

Customer Support: Eşarj provides 24/7 Turkish and English call centre support, including WhatsApp assistance and video call services, pioneering these features in Türkiye's EV charging industry.



People and Culture

140 Culture at Enerjisa

146 Talent Acquisition

150 Talent Management

CULTURE AT ENERJISA

Pioneering and Driving Energy Transition For a Better Future!

In line with our 2030 strategy and targets, Enerjisa Enerji adopts a governance model that will support the most effective and transparent operation of business units and central roles that provide common services, with a focus on profitable growth, providing flexible solutions to the differentiated needs of business units and functions, leading digital transformation, encouraging innovation, becoming the employer of choice and creating a targeted corporate culture. At Enerjisa Enerji, we are preparing our company today to lead the business life of the future with our People and Culture strategy.



With the power of our culture, Enerjisa is moving forward into a better future!

At Enerjisa Enerji, people are at the heart of our business and stand out as the most essential driving force for sustainable transformation.



Launched in 2023 as one of the priorities of People and Culture, the Culture Transformation Journey aims to ensure that all Enerjisa employees experience a common culture and climate. In this process, it is aimed to improve the current perception of culture, minimize differences and create a happier and more engaged employee profile. In this context, the dimensions of the culture desired to be experienced at Enerjisa were reconsidered and finalized.

Following the establishment of the ideal culture, a Culture Survey was conducted on a digital platform to assess employees' current cultural experiences, and 83% of employees expressed having experienced the ideal culture. In line with these results, six workshops were held, three online and three in person, to gain a thorough understanding of the cultural climate. A comprehensive roadmap to achieving the ideal culture was developed by engaging all title groups directly.

The developed roadmap was put into action in 2024, and visible leadership practices began to be applied under the direction of the company's senior management. Cultural Ambassadors were chosen to fully support this process of enriching the culture we live in. In addition, Culture Talks began to be hosted at Enerjisa Enerji, with Enerjisa Leaders and staff participating in live broadcasts. These activities will continue uninterrupted to further Enerjisa's cultural journey.

Culture at Enerjisa:

Common Purpose and Vision

At Enerjisa, we believe in acting in line with a common goal and vision at every step. This is not only a goal, but also a strong bond that brings all our employees together.

Valuing People

Touching the lives of our employees is our top priority. We design all our projects and processes in a way that makes



people feel the value we attach to them. This approach is one of our main characteristics that distinguish us from others.

Open Communication

Our communication culture is based on trust and sincerity. Creating an environment where everyone can listen to each other comfortably and share their ideas freely is one of the elements that make the working experience at Enerjisa unique.

Autonomy

We trust our employees to perform their jobs. We provide an environment where they can take initiative based on their knowledge and experience, and plan their resources to get things done. This encourages individual responsibility and increases productivity.

Creative Work Environment & Agility

Creating work environments that support creativity is a cornerstone of Enerjisa's culture. By flexibly adapting our ways of working according to needs, we encourage innovative solutions and quickly adapt to change.

Participatory & Collaborative Approach

We create an environment where every idea is valuable. By encouraging sharing and collaboration, we build a culture where all our employees can contribute. We believe in the power of acting together and embrace different perspectives.

At Enerjisa, culture is not just a concept; it is an understanding that is lived every day and constantly evolving with the contribution of everyone. This culture is the fundamental force that makes the success of both individuals and our company possible.

CULTURE AT ENERJISA

We strive for all our employees to experience a richer and more inclusive culture.



Erkan Dağışan
Electricity Distribution Technical Officer (Ayedaş Distribution)

For me, 'A Better Future' signifies achieving sustainability through green energy and renewable energy sources. In 2024, investments in renewable energy plants and sustainability-focused projects became tangible examples of this vision.

Through the SCADA system, I contribute to ensuring a secure and sustainable energy supply. In cases of outages, we minimize customer impact by activating alternative energy sources. Additionally, we monitor energy quality and conduct improvement efforts for the grid.

One of the features that makes me glad to work at Enerjisa is the Ikon application. It allows us to efficiently manage processes like payroll, leave, and various employee support programs while enhancing our skills through training opportunities.

Life at Enerjisa

With the strength we derive from our culture, we implement innovative practices that improve the employee experience and strive for all our employees to experience a richer and more inclusive culture.

Remote Working

Launched in 2019, the remote working practice continued to be successfully implemented in 2024 by expanding its scope for employee groups according to different needs. In order to support remote working, various facilities such as ergonomics support, provision of necessary inventory and communication packages were offered.

Flexible Benefits and Leave Practices

In addition, with the Flexible Benefits System implemented since 2021, employees can update their benefits as they wish according to their personal needs. In 2024, 64% of white-collar employees participated in the program.

At Enerjisa Enerji, there has long been a practice of annual leave in excess of the legal period. In addition to the existing practices such as breastfeeding leave, military leave, marriage leave, bereavement leave, and circumcision leave, new Enerjisa employees are

granted 5 days of welcome leave, and all employees receive 1 day of birthday leave per year. Paternity, adoption, and foster family leaves have been updated by adding 5 days to the legal period.

Recognition - Appreciation Application:

Rewarding Platform is used to support recognition and appreciation opportunities that arise as a result of the employee's contribution to the formation, functioning and positive development of the corporate culture and way of doing business. Through various applications developed with "Sana Değer," individual efforts and development of employees are recognized and appreciated, employees can appreciate each other on their special and important days.

Rewards and Benefits

Enerjisa Enerji predicates rewards and benefits on the principles of fairness, transparency, competitiveness, and rewarding high performance. In all its processes, the Company considers the wage market, the sector in which it operates, Sabancı Holding practices, and macroeconomic indicators.

Enerjisa Enerji aims to ensure a constructive and competitive work environment by implementing a competitive and fair wage policy through regular market analyses, for the purpose of attracting the necessary talent and maintaining a high degree of loyalty among current employees.

Enerjisa Enerji obtains the reports, surveys or statistics on remuneration from third party compensation consultants. Position levels at Enerjisa are determined on the basis of an external job evaluation methodology widely used by globally recognized corporations. Enerjisa participates in annual wage surveys to designate its base pay policy. For all grades, external consultants provide grade-based reference pay data based on the market, peer group, sector, etc. The Company sets blue collar wages in accordance with the Collective Labor Agreement.

Meeting Culture

Starting in 2022, the Meeting Culture Manifesto was published, enabling employees to better manage their time, with this manifesto, the practice of working hours without meetings continued in 2024.

Good Life Applications

While striving for a brighter future, Enerjisa Enerji prioritizes people and is concerned about the physical and mental well-being of its employees.

The Avita Employee Support Program carried on in 2024 by delivering professional assistance in the fields of psychology, medicine, finance, and law to our employees and their families. This program's objective is to reduce associated issues and offer proactive assistance in resolving issues that impact employees. 727 requests were submitted via the Avita Employee Support Program in 2024.

All employees have access to the healthy life application, which supports their healthy lifestyles by providing live lectures from specialists on subjects including mindfulness, exercise (fitness), pilates, yoga, and nutrition. This program, which their families can use as well, is actively used by over 1,400 employees. The majority of workers who responded to the feedback surveys said they were happy with the wellness initiatives.

In addition to these practices, our Enerjisa Sports and Esports clubs, which continue to work actively within Enerjisa Enerji and strengthen the bond between Enerjisa employees, also continue their activities.

Enerjisa Sports and Esports Clubs were established in 2022 to make it possible to have fun at work and to support the employer brand. The clubs, which include swimming, running, basketball and Esports branches and represent the Company in external tournaments, continued in 2024 with the participation of 69 Enerjisa employees active in swimming, running and basketball teams and more than 1,000 employees in Esports Clubs. Sports and Esports Club teams, which were formed following evaluation processes with expert coaches, crowned their success with medals in tournaments. A total of 118 medals were won in swimming, running, basketball and Esports.

CULTURE AT ENERJISA

By placing people at our center, we prioritize digital solutions that simplify the lives of our employees and transform all our processes accordingly.



Gökçen Aydın
Internal Audit Manager
(Shared Functions)

I believe that building a better future for everyone must begin within the organization itself. As the Internal Audit team, we evaluate the effectiveness of risk management, internal control, and governance processes, offering process improvement recommendations that contribute to institutional goals. With our risk and audit perspective, we conduct assurance and consulting activities independently and objectively.

In 2024, the project that impacted me the most was the "Karatay Sustainability: Supporting Fisheries" initiative, launched to raise awareness of corporate social responsibility and create a sustainable world. Beyond its contribution to the fishing economy, I find it valuable that this project supports women's employment and takes steps toward protecting our seas, delivering multiple benefits through the participation of numerous stakeholders.



DIGITALIZATION

HR Digitalization Project (HR Connect):

The HR Connect project, which aims to improve the end-to-end employee experience, accelerated digitalization efforts in People and Culture processes such as talent acquisition, reward management, labour relations, training and development. Scheduled to be completed in early 2025, the project has made processes faster and more efficient for our employees, candidates and People & Culture teams.

Digital HR Platform (İKON):

Since 2018, Enerjisa Enerji has been ensuring that more than 10 thousand employees living in different geographies are informed about developments within the Company at the same time via the Digital HR Platform İKON. With the improvements made in İKON, it is now possible for employees to instantly access the personal information they will need in their daily lives. The İKON application includes features such as

Chatbot, payroll viewing, Company seniority certificate viewing, requesting an advance payment, requesting visa documents, annual leave, training selection and evaluation, publishing internal announcements, and the recognition and appreciation platform.

Agile Work: Agile teams continued to be formed and 59 agile teams completed their transformation.

Productization with Value-Creating HR

Enerjisa Enerji aims to position its People and Culture (P&C) function as a structure that creates value in cooperation with business units, while at the same time transforming it into a revenue generating structure. In line with this vision, Enerjisa Enerji implemented the "HR as a Service" (HRaaS) approach, productizing and commercializing its P&C applications and solutions.

With this transformation, the Company has positioned P&C as a structure that makes strategic contributions to business units, creates value and generates revenue at the same time, going beyond being a unit that only provides services to employees.

AA+ (Administrative Affairs Plus)

Administrative Affairs Application: The application, which was developed in 2022 with the need for a digital structure that will play a role in carrying out the work of Administrative Affairs employees with minimum errors and reducing operational effort, and the management of these business lines from a single centre in multiple locations, and the fact that Administrative Affairs functions consist of a large number of comprehensive business lines such as fleet, security, cafeteria, facility management, building rental, communication, management of subcontracted employees, continued to be actively used in 2024.

ISO 9001 Quality Certification Process

Within the scope of the ISO 9001 Quality Management System in Enerjisa Retail and Distribution Business Units, third party audits were conducted in 2024 by an internationally accredited independent organization, ensuring the continuity of the certification and the effectiveness and sustainability of the management system. The absence of any minor or major findings in the audits, along with the emphasis on positive feedback, reinforces the effectiveness of our quality management system and strengthens our customer-oriented approach.

In 2024, Enerjisa Customer Solutions Company also started the ISO 9001 Quality Management System certification process to enhance customer satisfaction and service quality. This initiative adopts a continuous improvement culture by managing the company's processes in accordance with international standards and optimizing the processes.



Document Management System

At Enerjisa, the Quality Document Management System (QDMS) is used to effectively support quality management processes, allowing all employees to easily access important documents such as vision, mission, policies, procedures, etc. In this context, in 2024, the document folders of all processes were reviewed,

and the folder structures were updated to ensure their relevance. Task tracking is carried out within the relevant processes through the corrective action, action, and audit modules in the system. With a continuous improvement approach, system improvements were made in 2024, and version transition was enabled with a user-friendly interface.

TALENT ACQUISITION

Enerjisa Enerji places the principle of diversity and inclusion at the core of all its processes.

Enerjisa Enerji, comprising over 10 thousand employees across four generations in 14 provinces, views each one as "Talent" and operates with the vision of becoming the most preferred employer in the energy sector, ranking among the top 15 companies across all industries, and adapting to the Future of Work.

At Enerjisa Enerji, recruitment is carried out in accordance with the company's Human Rights Policy and Diversity and Inclusion Policy, ensuring equal opportunity while focusing on identifying and placing the most suitable candidate based on the company culture, organizational goals, job-specific competencies, knowledge and experience.

Enerjisa Enerji places the principle of diversity and inclusion at the core of all its processes. Throughout all P&C processes, Enerjisa Enerji upholds a fair approach regardless of language, religion, nationality, race, ethnicity, age, gender, sexual orientation, marital status, health condition, disability status, political opinion, union membership, or similar factors.

Enerjisa Enerji conducts all its activities in compliance with applicable legal regulations and Enerjisa Code of Business Ethics.

Participation in Management

Enerjisa Enerji values employee feedback and provides an environment where employees feel appreciated. In alignment with its cultural pillar,

"Collaborative and Participatory Approach," the company encourages employee participation in decision-making processes at every opportunity.

Employee participation in management is achieved through periodic meetings held within the Company, annual goalsetting and performance meetings, live broadcasts, involvement in decision making mechanisms, committees, and projects within the framework of authority and responsibilities. Additionally, employees can share their requests, suggestions, and opinions through various platforms such as intranet, mobile applications (IKON), I have an Idea portal (Bir Fikrim Var), feedback mechanisms, and surveys. The results obtained through these platforms are analysed, and action plans are created for necessary changes.

Enerjisa Enerji recognizes and evaluates employees who contribute to the Suggestion System based on acknowledgment and appreciation systems, and rewards them when necessary. The participation of high-potential employees in management decisions is particularly encouraged. Employees are informed about developments within the Company through various communication channels. Annual management meetings are held to provide employees with information about the overall situation of the Company.

I Have an Idea (Bir Fikrim Var)

With a culture of continuous improvement, we collected and evaluated employees' ideas through the "Bir Fikrim Var" portal and the Suggestion System for processes and practices within the company, receiving a total of 888 suggestions in 2024. 73% of the received suggestions passed the preliminary evaluation and were thoroughly assessed in the relevant categories. Of these suggestions, 53% were submitted by white-collar employees, while 47% were submitted by blue-collar employees. Enerjisa Enerji recognizes and appreciates employees who participate in the Suggestion System through its recognition and appreciation programs and rewards them when necessary. As Enerjisa, by considering the ideas of our employees, we not only aim to improve our existing systems but also strive to enhance our competitive strength in the industry by offering innovative solutions.

Orientation Program

Since 2020, Enerjisa Enerji has leveraged an end-to-end digital recruitment and orientation platform, incorporating data analytics into its hiring processes. In 2023, the Meta/Or Project was launched to introduce new employees to the Enerjisa universe via the metaverse. Newcomers receive orientation training, connect with employees from different locations to strengthen synergy, and explore key operational sites like the SCADA Centre, Solar Power Plant, Mobile Charging Station, and Customer Service Centre through Virtual Reality Glasses. Excellence in Recruitment Project,

implemented in 2024, aimed to enhance the candidate experience by reviewing and refining all recruitment processes, ensuring consistency across business units, and integrating innovative applications such as artificial intelligence into the processes.

Young Talent, Recruitment & Internship Programs

Our young talent recruitment and internship programs, aimed at attracting the talents of the future in various business sectors, have continued successfully in 2024. In Retail-X program within the retail business line, 44% women participants were achieved; in ITalent program within the IT function, 50%; in Enter Program within the distribution business line, 55%; and in Finance and Legal X program, 75%.

ENTER

ENTER is a structured program for fourth grade and graduate students enrolled in the departments of Electrical Engineering, Electrical-Electronics Engineering, Political Science and International Relations, Political Science and Public Administration, Mathematics, Statistics, Business Administration, Economics and Industrial Engineering of universities located in our Enerjisa Distribution regions. The eighth ENTER Program, held in 2024, aims to contribute to the employment of young talents and create a skilled workforce. The program, which lasts for nine months, includes rotations in the Electric Distribution Path, Functional

Units Path, and Data Management Path, allowing participants to gain insight into all the functions of the energy distribution sector. Participants also have the chance to discover their areas of interest through mentorship support from talent coaches.

ITALENT

ITalent is a long-term internship program targeting fourth-year university students and graduate students who wish to work in the energy sector, bringing together digital talents and helping them adapt to the technology world. The program is designed to nurture young professionals aspiring to build a career in information technology and digitalization, developing them as experts in their fields while they continue their education, and supporting gender equality for women in the technology sector. As part of this program, young talents gain career experience in various functions within Information Technology and Digitalization, while also having the opportunity to participate in training modules enriched with various tools to support their personal and professional development.

73%
EMPLOYEE
SATISFACTION
SCORE





TALENT ACQUISITION

One of Enerjisa Enerji's strategic priorities is a high-performance culture based on continuous learning, agility, passion, perseverance, and a sense of responsibility.

FINANCE & LEGAL X

Finance and Legal X is a Management Trainee program designed for future professionals interested in the fields of finance and corporate legal. Participants actively engage in Enerjisa's strategic projects and explore various aspects of the business world through rotations in different functions within Finance Department. This program aims to provide participants with a strong start to their careers

while also contributing to Enerjisa's sustainability and digitalization goals. As Türkiye's leading company in the energy sector, Enerjisa Enerji offers participants the opportunity to experience the dynamics of the energy sector in the best possible way with its innovative and agile structure.

RETAIL-X

Retail-X is a Young Talent Program aimed at attracting fresh graduates with a maximum of two years of professional work experience who are interested in working in electricity retail sales companies. Through this program, Enerjisa Enerji aims to strengthen its strategic position in the retail world by recruiting and developing new talents.

The third edition of the program, held in 2024, includes skill-building training, mentorship and coaching processes, and rotation opportunities in different functions, in addition to providing hands-on experience in professional work life within a long-term learning environment.

SPARK

SPARK summer internship program aims to spark the career journeys of third- or fourth-year students from universities' Engineering, Economic and Administrative Sciences, or Social Sciences faculties and introduce them to the Electricity Distribution sector. The program, which lasts for twenty days, consists of personal development, technical training, coaching support, project work, technical visits, and project presentations.

SEED

Focusing on strategic growth areas, the SEED program aims to strengthen the talent pool of young professionals by integrating them into the Sabancı Group. The program provides opportunities for competency development, career progression, and preparation for the future of work.

Internal Job Posting

Enerjisa Enerji supports rotation and creates opportunities for Enerjisa employees to work in new positions they aspire to during their learning journeys.

To provide equal opportunities to all employees and support talent and skill development, white-collar job postings have been open to all existing employees since 2022. In 2024, 27% of open positions were filled with applications from Enerjisa employees through internal postings.

Career Management

In 2022, the Career Architecture project was launched within the Information Technologies and Digital Business Management teams to create a technical competency-based career architecture that supports the right organizational structure and career paths, aimed at attracting and retaining qualified talent. The project achieved an 84% satisfaction rate. In 2023, efforts began to expand the project across Enerjisa Enerji.

With the start of the expansion of the project, the positions of over 2,000 employees were reviewed, more than 50 manager workshops were held, and field visits with project consultants were conducted to observe operations on-site. The project, which continues with the identification of business disciplines and deep expertise paths, is expected to be completed by 2025.

Employee Engagement and Satisfaction

Employee engagement and satisfaction are measured annually at Enerjisa Enerji. According to the 2024 survey results, the employee satisfaction score is 73%, and the employee engagement rate is 64%.

Enerjisa Enerji carefully evaluates feedback from employees. Based on this feedback, the company strives to improve working conditions, increase employee satisfaction and engagement, and reduce employee turnover. In addition to the external evaluations conducted annually, satisfaction is also measured in real-time through surveys about various P&C practices via the IKON application.

Enerjisa Enerji uses different mechanisms, such as one-on-one meetings and focus group discussions, in addition to surveys, to gather employee complaints, opinions, and suggestions.

Freedom of Expression and Right to Organize

Enerjisa Enerji respects employees' freedom of expression and does not tolerate any behaviour that would hinder this freedom. Additionally, the company supports the right to unionize within the framework of relevant legislation.

A Collective Labor Agreement (CLA) valid for two years (March 1, 2024 – February 28, 2026) was signed between Enerjisa Enerji's distribution companies and the TES-İŞ Union (Union of Energy, Water, and Gas Workers of Türkiye). Under this agreement, the wages and working conditions of 6.292 blue-collar employees have been determined in accordance with the provisions of the CLA.

As of July 2024, 69,357 (25.82%) of the 268,640 energy sector employees in Türkiye were members of TES-İŞ, making it the union with the highest number of members in the energy sector.

Performance Culture

Enerjisa Enerji implements a Performance Management System aligned with the company's strategies, commitments, and goals. It supports collaboration, fosters open and ongoing feedback dialogues, and prioritizes employee development. Employees included in the performance system experience a transparent, agile, and flexible process that is user-friendly and accessible via both web and mobile applications.

Through its People and Culture (P&C) practices that nurture a high-performance culture, Enerjisa Enerji aims to:

- Create a meaningful work environment that stands out with a positive organizational climate, communication, and culture.
- Develop leaders and good management practices.
- Offer equal opportunities in all HR processes to all potential and current employees, regardless of differences.
- Provide educational and development opportunities that enable growth and progress.
- Strengthen its employer brand to attract and retain talent.
- Achieve operational excellence that maximizes stakeholder engagement and satisfaction.



TALENT MANAGEMENT

For a better future, we view all our employees as talents and **design comprehensive training and development programs** to support their growth.



Enerjisa Enerji considers continuous development as one of its most important values, learns from past experiences to always be better, develops with a vision of the future and pioneers change.

The Company aims to recruit and develop qualified young people and experienced professionals through talent management practices that support its high-performance culture and vision of adaptation to the future of work.

Enerjisa Enerji believes that organizational success is based on individual achievements. Accordingly, the Company uses different talent management systems to identify and evaluate the performance and competencies of employees.

In order to ensure the sustainability of its organization, Enerjisa Enerji creates short- and medium-term succession plans for all critical positions in parallel with the potential evaluation studies conducted every year and monitors the career and development of its employees accordingly. In 2024, 88% of all appointments at the manager level and above were made from internal candidates.

The Company supports its employees with leadership, individual and professional development programs and tools. Accordingly, the number of training hours per person in 2024 was 34.48.

Details on the hours of training provided in appendix. Enerjisa Enerji helps employees lead the Company in the fastest and most effective way through programs developed to train effective leaders.

SABANCI HOLDING & ENERJISA DEVELOPMENT PROGRAMS

SABANCI HOLDING

Leadership Development Purposed Programs	Period and 2024 Participants
X-CELERATE	1,5 year, 3 participants
HR JOURNEY	1 year, 3 participants
Young Talent Development Purposed Programs	Period and 2024 Participants
SEED	1 year, 3 participants
Professional Development Purposed Programs	Period and 2024 Participants
GENAI Development Program	6 months, 5 participants

ENERJISA

Leadership Development Purposed Programs	Period and 2024 Participants
I WE ALL	1 year, 7 participants
LEAP	1 year, 28 participants
STEP	1 year, 173 participants
JUMP	1 year, 425 participants
Individual Development Purposed Programs	Period and 2024 Participants
YODA Mentorship – Reverse Mentorship	1 year, 290 participants
GATE: Self Awareness Journey	1 year, 352 participants
INSIDER	1 year, 690 participants
Language Training	1 year, 956 participants
Young Talent Development Purposed Programs	Period and 2024 Participants
YOUNG ENERGY	1,5 year, 20 participants
Finance & Legal X	1,5 years, 4 participants
ENTER	9 months, 18 participants
ITalent	9 months, 12 participants
RETAIL-X	1 year, 36 participants
SPARK	1 months, 170 participants
She-nergy	1 months, 667 participants
Professional Development Purposed Programs	Period and 2024 Participants
Retail Academy	1 year, 635 participants
KOZA Development Program	1,5 year, 59 participants
Patika Development Program	1 year, 699 participants
Polaris Program, Kaizen and Problem Solving Methods	1 year, 43 participants
DEEP	1 year, 2218 participants
Blue Collar Training	1 year, 8824 participants

TALENT MANAGEMENT

The Yoda Reverse Mentorship Program aims to enable different generations to learn from each other, providing the opportunity for the new generation of employees to mentor the senior management of Enerjisa Enerji.

LEADERSHIP DEVELOPMENT PROGRAMS

I WE ALL

The program implemented for Enerjisa Management Team and completed in 2024 consists of 3 modules including individual development, team development and the latest trends and developments in the Energy World.

LEAP

This program has been designed to enhance the ability of the director-level management team to lead business practices in the new world, by examining the Enerjisa cultural components, leadership model, and contemporary leadership trends.

STEP

STEP is a development program that aims to strengthen the leadership competencies of managers and group managers. The program offers a flexible, social and individual leadership development perspective by combining learning techniques such as remote learning, onsite training and simulations to practice.



JUMP

This was designed to ensure the employees who undertake team and process executive roles increase their efficiency in their current roles and develop their executive skills using the mixed learning method. A flexible, social and individual development world is presented to the employees with this program by combining learning techniques such as remote learning and simulations.

YOUNG ENERGY

Young Energy is designed to support and accelerate the development of high-potential young Enerjisa employees who are at the beginning of their careers. The aim of the program, which lasts approximately one and a half years; It prepares participants for future positions by supporting them to remove obstacles to their potential and performance. In the program, which started in the middle of 2023 and completed in 2024 includes 4 modules, trainings are planned to improve the

leadership, technical and professional competencies of the participants. In the program, participants will receive mentoring from our leaders, as well as experience how a project can be managed with agile methodology.

X-CELERATE

This was designed to enrich transformative/connected/inspiring/inclusive leadership styles for the leaders in different senior management levels. In the X-CELERATE Program many different learning methods take place, such as virtual class training, individual coaching sessions, company experience-sharing visits and business simulation applications.



INDIVIDUAL DEVELOPMENT PURPOSED PROGRAMS

YODA Mentorship-Reverse Mentorship

YODA Mentoring is our development tool that aims to provide support to Enerjisa employees who are willing to spend time for their professional and personal development and who are open to receiving feedback, by bringing them together with mentors who will guide them in this regard.

Yoda Reverse Mentoring program aims to ensure different generations learn from each other and allows a younger generation of employees to mentor senior management at Enerjisa Enerji. The reverse mentors will have the benefit of experience gained at senior management level and can explain the dynamics and expectations of their own generation. The employees receiving mentorship understand the dynamics of the new generation and they can benefit from the advice in both their private and business life.

EnAkademi

This e-learning platform aims to provide employees with online development tools to receive the training needed to reach career goals and to follow obligatory training. In EnAkademi, employees can plan and manage their own career development by selecting tools from a wide catalogue consisting of e-training, class training, simulations, videos, articles and development action recommendations to develop both their abilities and technical knowledge.

GATE: Self Awareness Journey

GATE is a development program designed with the personal development plan of specialist and assistant specialist based on Enerjisa competencies. It includes remote learning contents, webinars and onsite training. The program offers participants the opportunity to develop in Enerjisa competencies and future business trends.



INSIDER

Enerjisa aims to promote a culture of learning from each other within the company by enabling its employees to share their knowledge and experience with one another. Through the program, participants come together in need-based training sessions prepared by internal trainers who are experts in their fields. This allows them to foster the culture of learning from each other while focusing on technical skills and competency development. Starting in 2024, the program has not only created corporate value but also expanded externally, supporting various social responsibility programs with internal trainers, thus contributing to societal benefit.

Language Training

Enerjisa supports the development of employees who request foreign language assistance by using multiple tools such as digital platforms, speaking classes, and group lessons. In this context, foreign language support was provided to 956 participants in 2024.

Master's and Doctoral Support

This is our practice of covering 50% of the tuition fees for master's/Ph.D. programs that Enerjisa employees apply to for their professional/personal development, taking into account the support limit determined for the relevant year.

TALENT MANAGEMENT

Enerjisa Enerji offers fair and equal opportunities to all its employees, candidates, and business partners within its business processes and values.



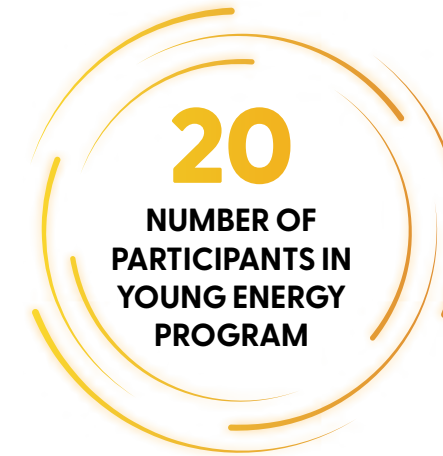
**PROFESSIONAL DEVELOPMENT
PURPOSED PROGRAMS**

Enerjisa Retail Academy

In order to develop the professional, technical, and leadership competencies of all employees in the Retail Business Unit, support strategic objectives, and prepare them for the future business world, all previous training programs (Sales School, Corporate Sales Academy, Energy Management Academy, and Operations Academy) have been consolidated under the Enerjisa Retail Academy. Designed using next-generation learning methods, the academy allows participants to lead their learning and development journey with a credit system, guiding their development by making choices from the available courses that align with their needs and areas of interest.

KOZA Development Program

The KOZA Development Program, which began in 2019, is designed to include training consisting of the needs of three different attendee profiles, with the purpose of supporting the development of sales teams and strengthening their experiences. In the program, which takes 1.5 years and consists of training to support technical and ability development and inspiring people, there is a project module where its Participants will share their related development/improvement recommendation with senior management with regard to business processes.



Technology Development Academy

The Technology Development Academy is designed with the purpose of ensuring that technology teams follow current trends and develop themselves in the areas needed. It is renewed every period within the scope of current needs and priorities and prepares employees with up-to-date technology awareness. The program's target is to maximise the potential of information teams and improve their performance in accordance with the vision and strategy of Enerjisa Enerji.

Patika Development Program

The Patika Development Program was created to help employees at the responsible, supervisor, technician, and authorized levels develop the skills they frequently need in their work. In 2023, based on focus group discussions and manager feedback, participants were asked to choose between Time Management or Excel training. Those who chose Excel took a Level Assessment Exam, and in 2024, they continued their training in online classes tailored to their level. In addition to classroom training in 2024, participants were also supported through webinars on Stakeholder Communication Management and Sustainable Motivation. For 2025, based on performance evaluation results, focus group discussions, and manager

feedback, Patika'25 has been designed. The target group will choose between courses on Data Management and Reporting or Personal Development. After the training, their development journey will continue with webinars on "Gender Equality" and "The Power of Hello."

Admission Training with VR

As a first in the distribution sector, the VR Glasses Project was launched with the aim of teaching facility acceptance processes to employees in a virtual reality environment. As part of this project, 100 engineers assigned to facility acceptances received VR Acceptance Training, enabling the possibility of remote acceptance by leveraging technology.

Engineer Training Institute

It is a development program designed to enhance the technical knowledge and skills of candidates and new engineers in Enerjisa's distribution companies, delivered digitally through EnAkademi. The training consists of two sessions with eight modules, covering the introduction of materials used in the field, field applications, and how to perform calculations. In the new phase, the training program is being transformed into a personalized platform tailored to the individual and the position, and design work is ongoing.

Mobile Training Facility

With Mobile Training Facility, visits were organized to 17 universities and 10 vocational high schools in the provinces where we carry out distribution activities. Over 2,600 students were reached, and technical practices in the distribution sector were explained. This initiative not only introduced the sector to the students but also provided them with valuable technical knowledge.

Polaris Program

To spread the culture of continuous improvement and integrate employees as part of the system, Kaizen and Six Sigma Projects have been brought together under the Polaris Program. Launched in 2023, this program collected 111 project ideas through Ikon. Based on company priorities, 13 Kaizen projects and 10 Six Sigma Green Belt projects were selected by process owners. Green Belt training was provided to the Six Sigma project team leaders, and Yellow Belt training was given to team members. Kaizen project team members continue to receive training on Kaizen and Problem-Solving Techniques. Both Six Sigma and Kaizen project teams continue their projects through weekly meetings.

TALENT MANAGEMENT

Enerjisa Enerji, within the framework of its Sustainability Approach, values the impact it creates for society and **defines diversity, equality, and inclusion as an important focus area.**

4,765

NUMBER OF BLUE COLLAR EMPLOYEES WHO COMPLETED THE CERTIFICATION PROCESSES

Since 2019, Kaizen projects implemented as part of continuous improvement have been carried out across 15 different processes within the company. In 2024, our ZEN Kaizen project team won the Kaizen Award at the Quality Circles Sharing Conference organized by the Turkish Quality Association for the project "Increasing Digital Application Rates."

DEEP

It is a program designed and implemented to increase the digital awareness of all our employees in the rapidly changing world of technology, and to provide information on what

can be done with the technologies that are currently impacting or could impact our lives in the future. Additionally, a key goal of the program is to explain how these technologies can be used and leveraged. The three main topics emphasized in the program are the speed of technological change, commercialized products, and the management of the risks associated with them.

Trainings for Blue Collar Workers

In 2024, 4,765 employees completed the certification processes required by law and obligations (such as EKAT, License, Safe Work at Heights, Safe Driving, UAV-1 Professional Competence Certificate, etc.) as part of Enerjisa Enerji's electrical distribution activities. A one-day Safe Work on Site Level 1 training was provided to 313 fault repair operators working in Network Operations to teach safe working methods and proper workmanship techniques while performing field activities in the distribution network. Additionally, a two-day Safe Work on Site Level 2 training was given to 1,609 fault repair operators. For Customer Operations, one-day training on Leak Awareness, MTH Basics, and Meter Processes was provided to 1,406 customer operations operators, while 274 customer operations

operators received two-day training on Meter Connections and Leak Awareness.

As part of the Planned Maintenance Procedures announced by the Energy Market Regulatory Authority (EMRA) in 2021 under the 4th Implementation Period, two-day Level 1 Maintenance Training was provided to 82 employees and two-day Level 2 Maintenance Training to 190 employees, aiming to enhance the technical knowledge of maintenance teams and improve maintenance efficiency.

Diversity, Equality, and Inclusion

Enerjisa Enerji, within the framework of its Sustainability Approach, values the impact it creates for society and defines diversity, equality, and inclusion as key focus areas. In line with its published Diversity, Equality, and Inclusion policy, Enerjisa Enerji is committed to fostering a diverse, equal-opportunity, and inclusive work environment. The company believes that equality and inclusion are fundamental human rights and observes that diversity enriches and enhances decision-making processes while increasing stakeholder engagement.

All of the company's activities are conducted in compliance with applicable laws and Enerjisa Enerji's Business Ethics Rules (Enetik 2.0). Through the Business Ethics Rules, Human Rights Policy, Human Resources Policy, Diversity and Inclusion Policies, and Zero Tolerance for Violence Policy, Enerjisa Enerji informs its employees and third parties about its operational principles. Efforts are made to reflect this approach across all areas, from employee experience to customer experience.

Enerjisa Enerji ensures equal opportunity in all its processes and works to prevent discrimination. No discrimination is allowed based on language, religion, nationality, race, ethnicity, age, gender, sexual orientation, marital status, health, disability, political views, union membership, or similar reasons. Enerjisa Enerji Diversity, Equality, and Inclusion Committee ensures that any actions that could lead to discrimination or mistreatment are reported by employees in accordance with confidentiality principles, and necessary actions are taken.

The Enerjisa Enerji Diversity, Equality, and Inclusion Committee, established in 2022, has developed the relevant strategy, with action owners being assigned and monitored. The Head of Sustainability and Corporate Competencies is responsible for diversity, equality, and inclusion initiatives and serves as the Committee Chair. The decisions and actions approved by this Committee are reported to the Sustainability Executive Committee by the Committee Chair.

Our Head of Sustainability and Corporate Competencies and our Head of People and Culture participated and successfully completed the "Inclusive Leadership for Corporate Sustainability" training, organized in collaboration with Sabancı University

Corporate Governance Forum, the 30% Club, IFC and ILLAC. They served as the committee chair and vice-chair in this initiative.

The diversity, equality, and inclusion platform "Sensiz Olmaz" (Not Without You) is structured under the clusters of "Equality is Essential," "Youth is Essential," and "Inclusion is Essential" to provide equal opportunities in the workplace. Topics such as gender equality, youth,

and accessible practices are prioritized, and efforts are ongoing to support society at large. The effectiveness of these initiatives is regularly monitored.

Enerjisa incorporates its employees into voluntary working groups to bring diverse perspectives and skill sets into its Diversity, Equality, and Inclusion efforts. These groups report to the Diversity, Equality, and Inclusion Committee.



TALENT MANAGEMENT

Since 2019, Enerjisa volunteers have been actively mentoring under the Million Women Mentor Program.



Equality is Essential!

In 2019, Enerjisa Enerji became a signatory of the WEPs (Women's Empowerment Principles), one of the significant global private sector initiatives aimed at ensuring women can increasingly participate in economic life across all sectors and at all levels. In 2023, to deepen and strengthen the WEPs Principles and practices, Enerjisa Enerji was selected as one of 10 companies for the "From Words to Action" WEPs Project, led by the UN Women Unit. In collaboration with UN Women consultants, the company developed an action plan related to the Women's Empowerment Principles.

She-nergy is a program specifically designed for female engineering candidates, with the aim of introducing electrical distribution sector opportunities to Electrical and Electronics Engineering students across Türkiye. However, thanks to its open events, it appeals to a wide audience.

The second edition of the She-nergy program in 2024 has reached a total of 1,426,136 individuals so far. The 2024 opening webinar hosted leading figures in the sector and inspired 573 university students. The Tea Talk event and the 3-month project process offered participants an opportunity to learn about Enerjisa Distribution Companies and the electricity distribution sector in-depth.



During the project process, 80 participants developed innovative projects and had the chance to work one-on-one with project coaches from Enerjisa Distribution employees, enhancing their technical skills and gaining industry experience. In the grand finale held on December 18, the winning project team was awarded the grand prize.

Enerjisa Enerji takes a strong stance against gender-based violence and harassment, which has been increasing every year, and strives to raise awareness and provide support. Through its "Zero Tolerance for Violence" policy, the company shares this stance with all its stakeholders.

Since 2019, Enerjisa has participated in the "Business Against Domestic Violence" (BADV) Project, led by the Sabancı University Corporate Governance Forum with the support of UNFPA and the Sabancı Foundation. In 2022, Enerjisa became a strategic member of the "Business Against Domestic Violence Network," which was established with the aim of enhancing communication among member companies, increasing inspiration and experience sharing, spreading best practices, and growing stronger by adding new companies.

Gender Equality workshops for managers; awareness programs, trainings, and virtual meetings on Gender Equality for all employees have been carried out. Comprehensive webinars aimed at breaking gender-based stereotypes have been organized to raise awareness throughout the company. As part of the Human Rights training provided to all employees, workers are made aware of their rights when faced with gender-based discrimination and harassment in the workplace. Informative sessions on "Fundamental Concepts of Violence" were also conducted for the Diversity, Equality, and Inclusion Committee.

As Enerjisa Enerji, we take pride not only in raising awareness in the fight against gender-based violence but also in leading societal change through concrete actions.

In 2024, we established a comprehensive roadmap to combat gender-based violence and harassment in our offices and work sites. In this process, we prepared a Gender-Based Violence and Harassment Risk Assessment Report to evaluate the current situation in our business processes and work environments, identify risks, and develop solutions. Through workshops and training sessions, we increased our employees' awareness, strengthened leadership support with senior management sessions, and designated voluntary "Güven Elçileri" whom employees can approach with confidence. After completing their training, the ambassadors began their duties to raise awareness and provide support when needed. Investigation Teams received specialized training and adopted the correct and effective approaches to handling violence cases. Support and intervention mechanisms have been strengthened. With these actions, we aim to create a safer and more equal future not only in our workplaces but also in our communities.

Inspired by the She-nergy project, the "Young Women Building Their Future" program was developed and integrated into our distribution companies, in collaboration with Sabancı Foundation. The target audience consists of female graduates and candidates from Vocational High Schools and Vocational Colleges in the Electrical/Electronics departments. The program took place in February 2024 in Toroslar/Adana with 12 participants. As part of the project, Enerjisa provides mentorship and training support to empower women and help them integrate into the workforce.

Additionally, Enerjisa supports organizations working on women's empowerment and collaborates on their projects. The company is a main supporter of the "Million Women Mentors" Program, led by TurkishWIN, a global sisterhood platform. The program aims to bring young women (aged 15-25) studying or working in STEM (Science, Technology, Engineering, and Mathematics) fields together with industry leaders through a digital platform. Since 2019, Enerjisa volunteers have actively participated in the program as mentors. Enerjisa also provides educational support to the Women in Technology Association (Teknolojide Kadın Derneği), where they specialize in empowering and training women who are underrepresented and lack motivation to build careers in technology. Furthermore, Enerjisa is a corporate member of the Green-Collar Women Association (Yeşil Yakalı Kadınlar Derneği), which focuses on promoting clean energy transitions, increasing female employment, and helping young graduates in STEM fields become acquainted with and oriented toward new green technologies. Enerjisa supports the association's initiatives and hosted the association's "Ankara" year-end meeting, where the company provided information about its activities and discussed its gender equality efforts.

TALENT MANAGEMENT

As part of the “Sensiz Olmaz” Diversity, Equality, and Inclusion Platform, our volunteer working groups continue to work towards providing equal opportunities for everyone in the workplace.



Özge İnci Çandır Analysis and Project Planning Process Leader (Renewable Energy)

By working in the Renewable Energy Department, I contribute to Enerjisa's sustainability goals for the future. Participating in projects involving solar, wind, and storage power plants to expand the use of clean energy sources gives me immense pride. These efforts help reduce dependence on fossil fuels and build an environmentally friendly energy infrastructure, playing a critical role in creating a cleaner energy future.

Enerjisa's objectives prioritize increasing renewable energy resources and reducing carbon emissions, emphasizing environmental sustainability. The motto “A Better Future” reflects the importance of considering not only today's but also tomorrow's energy needs, using natural resources efficiently and responsibly. Through its reference projects in this field, Enerjisa demonstrates its commitment to supporting the vision of “A Better Future.”

Enerjisa's internal trainers have advanced our strong knowledge-sharing network by conducting voluntary training sessions with YenidenBiz Association, an organization that helps skilled women re-enter the workforce after taking breaks for various reasons. Enerjisa has embraced this mission by offering training sessions led by our internal trainers for the members and volunteers of the association. These trainings not only provided knowledge transfer but also helped participants gain the confidence, courage, and vision needed to re-enter professional life. Our internal trainers share their expertise and inspire the strong women of YenidenBiz, preparing them for professional life. In 2024, creative drama, Excel usage, digital technology trends, and productive AI courses were held for the association's members and volunteers.

As part of the “Sensiz Olmaz” Diversity, Equality, and Inclusion Platform, our volunteer working groups continue to work towards providing equal opportunities for everyone in the workplace. The “Equality is Essential” Working Group experienced the gender equality-focused board game “EşiTCE” during two-day training sessions in Ankara and Istanbul, raising awareness while receiving facilitator training to spread this experience within Enerjisa. Enerjisa volunteers continue to raise

awareness about gender equality by meeting with employees at our offices and field sites and spreading the message of gender equality through the fun board game.

The Inclusion Project Team in the Distribution Business Unit organized a “Living Library” event, allowing participants to share different perspectives and experiences. In this event, participants had one-on-one conversations with individuals from diverse gender, cultural, identity, and experiential backgrounds, offering them the opportunity to challenge societal prejudices and develop a broader sense of empathy. The “Living Library” provided participants with a deeper understanding of diversity and inclusion by listening to different life experiences firsthand.

Focusing on inclusion, Blind CV and Board Game projects were developed. With Blind CV, the goal was to eliminate gender-based and racial biases, ensuring a fairer evaluation process based solely on candidates' professional qualifications and experiences. The Board Game project was designed to emphasize the importance of gender equality, inclusivity, and diversity, aiming to spread these values throughout society.

The Inclusion Team plans to continue its efforts in 2024 to bring more female engineering candidates into the sector and foster an equal and inclusive work culture.

Every year, Enerjisa participates in the UN Women-led activism campaign between November 25 (International Day for the Elimination of Violence Against Women) and December 10 (Human Rights Day). Through this campaign, awareness about combating violence is raised both among employees and stakeholders. In 2024, as part of the activism campaign, Enerjisa aimed to raise awareness among its customers by including information about support helplines in the bill messages printed on electricity bills throughout November. These messages provided contact numbers for relevant ministries in case of experiencing or witnessing violence. Additionally, a webinar discussing inspiring corporate practices in gender equality and combating violence against women was held, where 250 university students participated. Enerjisa's basketball teams in Ankara and Istanbul also took part in the 16 Days of Activism – End Violence Against Women campaign this year, highlighting the daily anxiety that women experience. Awareness was raised by using campaign visuals at Customer Service Centres.

To increase female representation, the company has set a goal to boost the percentage of women in its workforce. This target has been added to the function-based goal cards and will be tracked throughout 2024 with necessary actions taken. On behalf of Enerjisa, two managers are participating in the ‘Target: Gender Equality’ program led by the UN Global Compact, receiving training on successfully setting and implementing gender-based performance goals.



In 2024, 9 female employees returning from maternity leave were provided with internal mentorship support to ease their reintegration and adaptation process, enabling them to join the mentorship program.

To assist its employees with kids, Enerjisa Enerji has set up nursery discounts at the neighborhoods of each of its facilities. We also have four breastfeeding rooms at our headquarters in Başkent Kule, Hanimeli, Maltepe, and Toroslar to help new mothers who are nursing.

Youth is Essential!

In 2024, Enerjisa has achieved the following female participation rates in various talent acquisition programs targeting different job functions:

- Retail-X (Retail): 44%
- Italent (Technology): 50%
- Enter Program (Distribution): 55%
- Finance and Legal X: 75%

Enerjisa Meets Young Talents

At Enerjisa, we believe in the importance of connecting with young people and inspiring them. We meet with students through face-to-face and virtual platforms at high school, university, and various NGO events. By sharing information about the energy sector and career opportunities, we aim to contribute to their personal development. Through various talent programs, high-potential young people with different skills have been brought into the company.

In 2024, Enerjisa Enerji participated in more than 40 campus events across Türkiye and had the chance to communicate one-on-one with students and introduced Enerjisa Enerji by answering their questions.

TALENT MANAGEMENT

The Retail-Xperience meetings offer a unique opportunity to experience innovative approaches in the energy sector and explore future opportunities.



During the 46th Istanbul Marathon, nearly 200 Enerjisa Volunteers participated, running to raise donations through the NGOs chosen by the young participants.

As part of the Vocational High School Coaches Program, led by the Private Sector Volunteers Association, Enerjisa volunteers provide group coaching to 10th and 11th-grade vocational high school students. The coaches meet with the same group of 106 students at least 12 times over two years, addressing various personal development topics in each session. This initiative aims to support students' socialization and development while also serving as role models to impact their lives positively.

To promote learning between different generations, Enerjisa has launched the "Yoda Reverse Mentoring Program," offering younger employees the opportunity to mentor Enerjisa's senior management. In this program, 33 young Enerjisa employees have started mentoring directors and management team members.

Retail-Xperience Meetings

The Retail-Xperience meetings were launched to support and inspire young talents in their career journeys. These meetings offer a unique opportunity to experience innovative approaches in the energy sector and explore future opportunities. Through these gatherings,

we aim to discover new horizons in the business world alongside the younger generation.

The goal of these meetings is to comprehensively introduce students to the energy sector and share insights about professional life. By discussing projects and the company vision under the theme "On the Road to the Future," we aim to help young people discover their potential. The meetings for university students include training sessions on energy efficiency and renewable energy, career talks with leaders, as well as visits to the Energy Tunnel and Customer Service Centre.

Through the Retail-Xperience meetings, Enerjisa offers not only an introduction to our company but also a chance to experience innovative approaches in the energy sector and explore future opportunities. These gatherings allow the younger generation to discover new horizons in the world of energy.

Inclusion is Essential!

Enerjisa's "Engel Tanımayanlar Olmazsa Olmaz" working group continues to focus on accessibility. The group works across various platforms to increase awareness and knowledge levels, and they also engage in company visits to learn from best practices.



One of the notable achievements of Enerjisa is the Energy Experience Tunnel located at the Söğütözü MHM, which offers visitors an interactive experience. This tunnel, a first in the sector, focuses on sustainability and technology while continuing its mission of educating customers about a better future. In collaboration with the award-winning app DANIŞ, designed for visually impaired individuals, the project group made the Energy Experience Tunnel accessible. Through this app, visually impaired visitors can explore the energy sector freely and experience the tunnel.

As part of the "Engel Tanımayanlar Olmazsa Olmaz" initiative, Enerjisa has been running the EnBiz project in its distribution companies since 2016. This project, which focuses on diversity and inclusion, spans both social responsibility and recruitment processes. In 2023, the project was restructured into three main categories: Communication, Career, and Equal Access. The Communication activities have continued effectively in 2024, with participation in the Careers Beyond Barriers event organized by 3İK, where EnBiz's efforts to increase the participation of disabled individuals in the workforce were shared.

Through the EnBiz project, Enerjisa not only creates new career opportunities for individuals with disabilities but also strongly demonstrates its commitment to

building a more inclusive workforce. The company continues to offer widespread education and development opportunities, positioning diversity and inclusion as an integral part of its corporate culture.

Efforts to ensure physical and digital accessibility continue both for employees and customers. The Equal Access Project includes behaviour training and sign language courses for all Customer Service Centre employees to eliminate communication barriers for individuals with speech and hearing impairments. Additionally, work is ongoing to make all service points physically accessible.

Enerjisa also implements a voice billing system, allowing customers to receive their bills audibly through the call centre. Bills and contracts are provided in Braille and visually impaired customers can complete all their electricity transactions through digital channels using 100% voice simulation technology.

One of Enerjisa's longest-running social responsibility projects, "Küsmesin Yıldızlar," a theatre play, has been made accessible through audio description and sign language in collaboration with the Audio Description Association. This project is available to the public and aims to ensure that everyone has access to cultural experiences.

TALENT MANAGEMENT

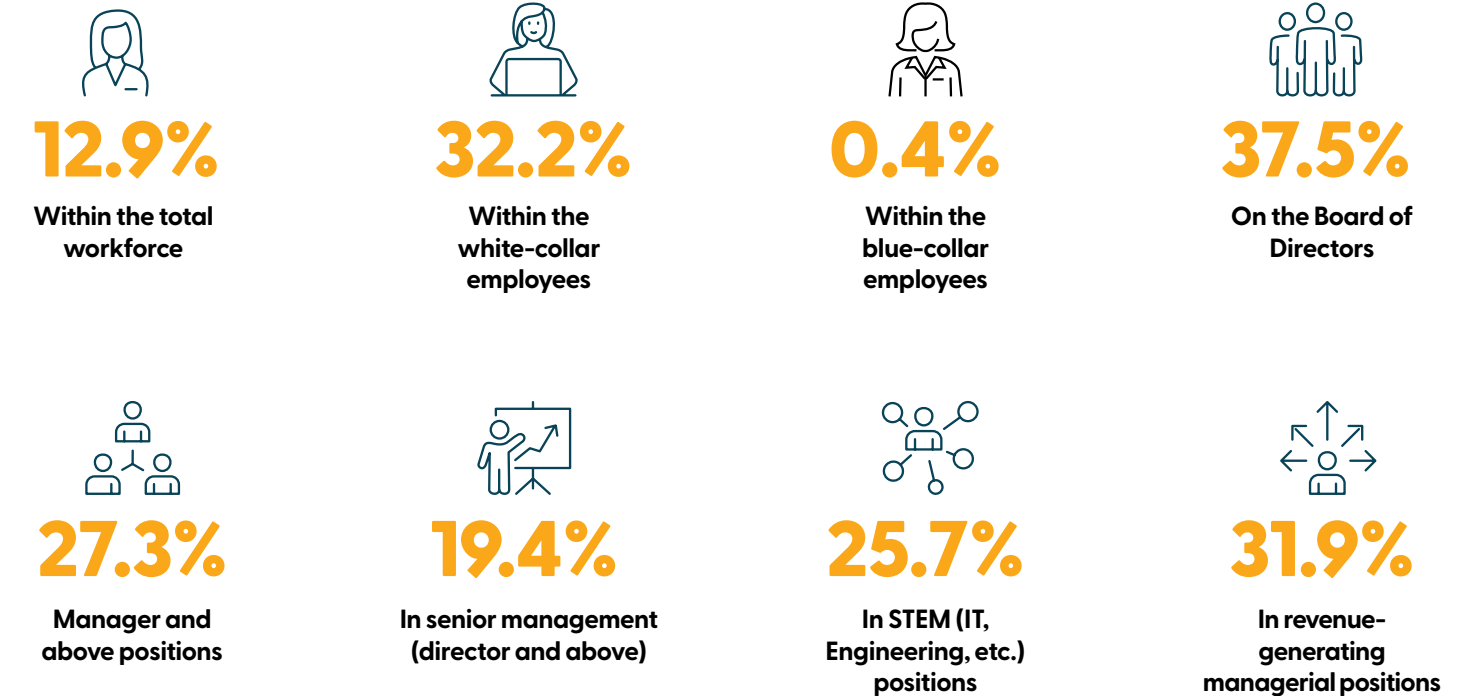
Enerjisa Enerji provides fair and equal opportunities to all employees, candidates, and business partners in its business processes and value chain.

From recruitment to all processes, gender equality is a priority for Enerjisa. The company's diversity approach goes beyond gender, as it also supports age diversity and encourages learning from the different generations within the workforce.

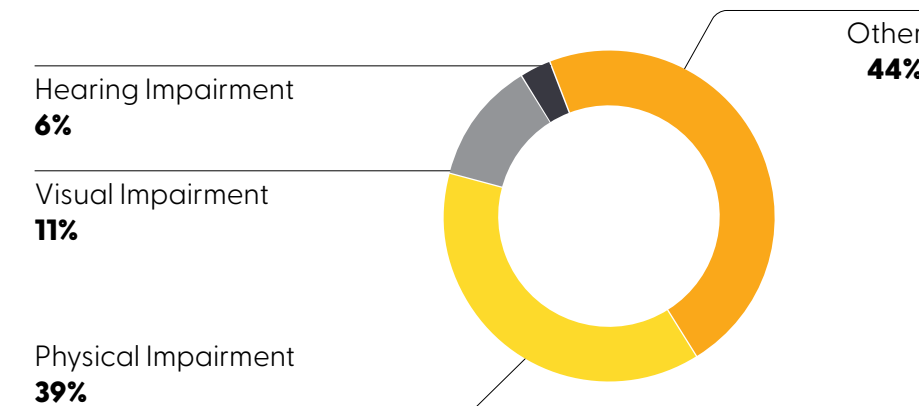
- In 2024, 61% of the newly hired employees were under the age of 30, while 30% were between the ages of 30 and 49.
- 19% of employees are under 30, while 77% are in the 30-49 age range.
- 29% of employees have been working for 5 to 10 years, while 31% have been with Enerjisa Enerji for over 10 years.
- The participation of people with disabilities in social and economic life is supported under equal conditions. As of 2024, the total number of disabled employees, which is 3121, exceeds the legal obligation.

Enerjisa Enerji, which published its Diversity and Inclusion Policy, offers fair and equal opportunities to all its employees, candidates, and business partners within its business processes and values. For this purpose, every white-collar job posting is open for application by all employees. Additionally, it acts with an awareness of its impact and responsibilities in creating a positive effect on society based on human rights.

WOMEN EMPLOYMENT STATISTICS - 2024



EMPLOYEE DISTRIBUTION BY DISABILITY - 2024



In 2024, the employee turnover rate for female employees* at Enerjisa Enerji was 1.0%, while the turnover rate for male employees** was 10.5%. These rates are below the industry and Türkiye averages according to similar analysis studies conducted by globally recognized corporate companies.

*Female employee turnover rate: Number of female employees who voluntarily left / Total number of employees
 **Male employee turnover rate: Number of male employees who voluntarily left / Total number of employees



Information Technologies

168 Data Security
172 Digitalization

DATA SECURITY

Enerjisa Enerji considers all the information that it collects and processes through all kinds of methods and that belongs to itself and its stakeholders as critical assets and takes utmost care and importance for its protection.

The amount of data that we are processing, transmitting and storing is growing exponentially along with digitalization processes. As part of our responsibility to provide a public service, we take every precaution necessary to ensure the highest level of confidentiality and security regarding customer data within the framework of applicable legislation. To that end, we implement the measures and actions stipulated in our corporate policies and procedures.

INFORMATION SECURITY MANAGEMENT POLICY

Enerjisa Enerji considers all the information that it collects and processes through all kinds of methods and that belongs to itself and its stakeholders as critical assets and takes utmost care and importance for its protection.

Accordingly, with reference to the ISO/IEC 27001 Information Security Management System standard, the Corporate Information Security Management System is effectively implemented within Enerjisa Enerji.

The main purpose of corporate information security is to ensure the confidentiality, integrity and availability of any information collected and processed by Enerjisa Enerji. Due to the nature of Enerjisa

Enerji's corporate activities, the main goal of corporate information security is to prevent material and intangible losses that may occur and affect Enerjisa and its stakeholders, to early identify these losses if they occur and to minimize their possible effects by designing, operating, monitoring processes and taking precautions by continuously improving them.

Regardless of their positions or duties, all Enerjisa Enerji employees and related third parties comply with Enerjisa Enerji's practices, policies and procedures regarding information security. Violation of corporate information security policies and procedures may result in disciplinary action and criminal sanctions within the scope of the relevant legislation.

The manager of each unit is primarily responsible for taking all necessary measures in their areas of responsibility and controlling business activities in order to ensure compliance with corporate information security policies and procedures.

Enerjisa Enerji commits that it will meet the applicable requirements regarding information security institutionally, will ensure compliance with all kinds of legislations, laws, communiqués and similar regulations that Enerjisa Enerji is obliged to comply with, and will continuously improve its Information Security Management System.

INFORMATION SECURITY MANAGEMENT APPROACH

Scope

Design, implementation and maintenance of our information security management approach is determined based on the Information Security Management Policy and the internationally accepted ISO 27001 standard. Our Information Security Management Approach encompasses the following: Enerjisa Enerji A.Ş., our electricity distribution companies (Istanbul Anadolu Yakası Elektrik Dağıtım A.Ş., Başkent Elektrik Dağıtım A.Ş., Toroslar Elektrik Dağıtım A.Ş.), incumbent retail companies (Enerjisa İstanbul Anadolu Yakası Elektrik Perakende Satış A.Ş., Enerjisa Başkent Elektrik Perakende Satış A.Ş., Enerjisa Toroslar Elektrik Perakende Satış A.Ş.) and Enerjisa Müşteri Çözümleri A.Ş.

Data Security

In order to meet business needs and ensure compliance with laws and regulations, technical and administrative measures related to information security and operational processes are carried out by the Cyber Security Group Directorate under the Information Technologies and Digital Business Management Department. We ensure that the necessary support is provided and make the necessary assignments to fulfil information security requirements.

We take the necessary measures to ensure the highest level of confidentiality and security for customer data within the framework of the relevant rules and regulations and to this end, we implement the measures and actions specified in Company policies.

Since data is a critical asset, confidentiality, integrity and availability of data is of great importance to us. We conduct the necessary technical and administrative controls at every point where data is obtained, processed, transmitted and stored. We process data only for business needs and ensure that it can only be accessed by authorized staff, considering the level of confidentiality of the data.

The copyrights for the information and materials on our website belong to us. All copyrights, registered trademarks, patents, intellectual and other property rights related to the information and materials on our website, other than those belonging to third parties, are reserved by us.

In all operational processes, we implement the information security management system with a defined risk management approach and in compliance with information security policies, procedures, instructions and other issues including standards, frameworks and guidelines based on international and sectoral good practices. We share the relevant documentation within our Document Management System and make it available to all our employees. The purpose of information security documentation is to manage information security risks and ensure that data is adequately protected. While using the information assets they are responsible for, all employees are responsible for the implementation of the Information Security Management Policy and related procedures in the operation of business processes throughout their employment at our Company and even when they quit their job.



Personal Data Protection Law (PDPL)

As the Data Controller, for the continuity of our activities and services, we process personal data obtained verbally, in writing or electronically through channels such as the head office, regional offices, customers, dealers, website or call centre with the processing conditions listed in Article 5 of the Personal Data Protection Law (PDPL).

Personal data processed by business units for the purpose of carrying out their routine operational activities are securely stored in the electronic systems and physical environments we use.

Data owners are informed with clarification texts about the mentioned data processing activities through our various channels on the purposes of processing, the security measures taken, the rights of the data owner and the application channels. In order ensure a lawful data processing, this clarification

must be made to the data owner before the data is processed and if it is not within the scope of the exception in accordance with the PDPL, explicit consent must be obtained.

The security of personal data is among our top priorities. Therefore, we prepare and update policies and procedures for the protection of personal data and take necessary and suitable technical and administrative security measures in compliance with relevant legislation to protect personal data against unauthorized access, damage, loss or disclosure.

Third parties are prevented from accessing the information entered by our customers through the website. In order to protect the confidentiality of our customers' personal information, our system and access infrastructure is maintained at the most reliable manner and the necessary measures are taken.

DATA SECURITY

Throughout the year, **simulations/practices of phishing attacks** are made at regular intervals by **Cyber Security Group Directorate**, and the results are evaluated.

Personal data whose purpose of use and legal storage period have expired, are deleted, destroyed, or anonymized in accordance with Article 7 of the PDPL.

When required, we receive support services from different organisations and ensure that these organisations act in accordance with our privacy standards and terms. We make sure that the data processors with whom we work value information security and act with the awareness of mutual responsibility, and we also guarantee this contractually.

The applications of persons whose personal data are processed regarding their rights listed in Article 11 of the PDPL are answered within the legal period by examining the system records and customer documents.

Incident Response

We have a Cyber Incident Response Team within the Cyber Security Group Directorate. All kinds of software, hardware and human-induced situations that disrupt the normal operations of our business processes and negatively affect some or all information or industrial control systems are defined as information security incidents. We examine situations such as malware, phishing attacks,

unauthorized access, cyber-attacks and data exfiltration (data leak) as part of the information security incident management process. The application, system and access components of our Company are continuously monitored using monitoring and detection tools that are deemed to be successful by the information security industry. We ensure that incidents encountered within the scope of monitoring are evaluated, relevant actions are taken and the issues are resolved properly.

Our Cyber Security Group Directorate follows technological developments and vulnerabilities around the world through cyber intelligence services. Penetration tests are performed by independent teams once a year and the safety of the applications and services of our company are ensured by implementing a secure development life cycle. In addition, vulnerability scans, source code analysis and maturity assessments are performed. The deficiencies that are identified as a result of these evaluations are examined, monitored and the relevant actions are undertaken with the guides of the Cyber Security Group Directorate.

In case of emergence of an information security incident or a vulnerability that may cause an incident, our employees

including outsourced employees/ external consultants are informed about what channels to make their notifications through. Reminders are also made at regular intervals. The process document for the actions to be taken after notifications is periodically reviewed and implemented.

In addition, the Information Security Awareness Commitment document signed with the third parties (suppliers, vendors etc.) includes an article stating that that the suppliers should contact us in case of an information security incident.

Information Security Awareness

Şirketimizde verinin ve veri güvenliğinin As data and data security are of great importance to us, we conduct training sessions in order to increase information security awareness. The completion rate for the training is monitored by senior management in order to raise awareness within the Company and to exhibit an integrated approach within the organization.

Throughout the year, simulations/ practices of phishing attacks are made at regular intervals by Cyber Security Group Directorate, the results are evaluated and reported to senior management. We prepare Cyber



Security Newsletters that are sent to all employees every two weeks and share global and domestic cyber security news. We also share e-learning training videos about information security with all employees every two weeks. At the end of each quarter throughout the year, we share the statistics of current attacks in our country and around the world with all Company employees via informative emails. We implement clean table - clean screen policies and remind our employees of our policies with posters in physical locations.

All personnel are required to sign the information security commitment which states that information security issues are the common responsibility of all personnel.

Licenses and Certificates

- We and our distribution and retail companies hold the ISO 27001 Information Security Management System certificate, which is given as a result of the audits carried out by accredited institutions.
- Our distribution and retail companies hold the ISO 20000 Information Technology Service Management System certificate, which is given as a result of audits carried out by accredited institutions.
- Our retail companies hold the ISO 22301 Business Continuity Management System certificate.

In addition, compliance with the Electricity Licensing Regulation, Industrial Control Systems (ICS) Information Security Regulation, Electricity Distribution and Sales Call Centre Service Quality Standards, ICS Security Analysis and Testing Procedures and Principles, Cyber Security Competency Model in the Energy Sector which are subject to the EMRA and compliance with the Information and Communication Security Guidelines of the Digital Transformation Office of the Presidency of the Republic of Türkiye is periodically checked by Cyber Security Group Directorate.

Information Security at Third Parties

When working with third-party companies, we include confidentiality clauses in the contracts to ensure the continuity and quality of the services provided by us. If there is a need for data sharing due to business requirements, we share only the necessary data. We have approval processes for the safe transfer of data and ensure that only data required for the job is transferred.

In order to protect such data, we take security measures in accordance with international standards in our systems and applications. Critical suppliers are evaluated within the scope of information security according to the criteria determined in line with the annual plan. Actions to remedy the deficiencies observed in the evaluation results are followed by the Cyber Security Group Directorate Trainings.

Training

In 2024, we assigned PDPL training to our employees through EnAkademi, and 837 employees completed 1,112.6 hours of online training. In 2024, the Information Security Interactive Training and exam was assigned through EnAkademi, and 3,846 people completed a total of 5,128 hours of online training. In the online and in-class training, Information Security sessions were organised for new recruits, and 174 people received a total of 174 hours of training.





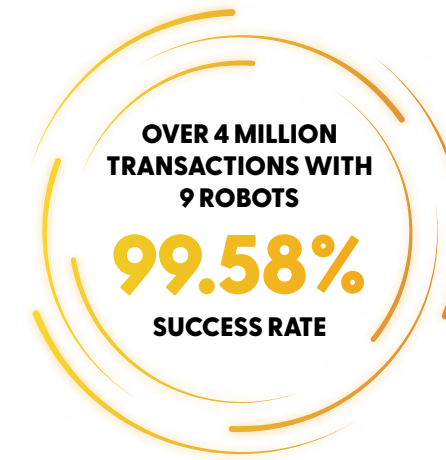
DIGITALIZATION

While supplying energy to our customers, **we are adding value to the world, humanity, and our own activities** by harnessing the power of technology.

DIGITAL TRANSFORMATION MODEL – E-TERNAL

While supplying energy to our customers, we are adding value to the world, humanity, and our own activities by utilizing the power of technology. To strengthen sustainability holistically through digitalization, we developed the digital transformation model E-TERNAL in 2020. “Ternal” symbolizes our commitment to improving our world, our people, and our business, while the letter “E” represents electronics, energy, and Enerjisa.

By defining our roadmap for technology adoption and transformation across the company, we are implementing projects that align with our corporate strategies. In 2024, we added a productive artificial intelligence approach to our previously defined priorities of “Digital Transformation” and “Technology Compatibility.” We recognize the importance of developing digital skills to align with business needs, quickly adapt to emerging technologies, ensure operational excellence, support innovation, and embrace continuous improvement within the organization. Therefore, we designed a program called “DEEP” aimed at making the skills and knowledge necessary for all our employees to benefit from current



technologies more accessible. As part of this program, webinars covering Artificial Intelligence, Cybersecurity, and Technological Developments were held with participation from over 1000 employees throughout the company. Additionally, 15 elective trainings in areas such as Productive Artificial Intelligence, Data Visualization, and Data Analytics have been designed, and training continues for over 800 employees who selected these courses within the company.

For the next five years, work has begun on over 360 new digital projects. Additionally, 73 projects within the distribution and retail business units were completed in 2024.

To enhance analytical competencies and ensure continuity in analytical projects while supporting our employees involved in these projects, we established the Analytic Circle Community. Together with this community, we have aimed to develop our analytical knowledge through comprehensive trainings and pursue new analytical projects that will advance our company. In 2024, we held both online platforms and face-to-face meetings with the community.

In 2024, as part of the Analytic Circle, we conducted our Enerjisa AI Mediathon event, where we imagined the future of Enerjisa and materialized our dreams using productive AI tools. Our event, filled with creative ideas, featured 11 entries produced using productive AI tools and 23 participants, illuminating our future.

In the energy sector, where highly intensive and repetitive tasks are common, we continue to work on broadening the implementation of Robotic Process Automation (RPA) across all possible processes in our company. In 2024, we applied RPA technology in many business units such as Law, System Operations, Finance/Accounting, and Customer Relations in over 60 processes. As of 2024, the number of robots in our company has increased to 9. We achieved a success rate of 99.58% for over 4 million transactions. Our Hyperautomation – Invoice Dispute project won the first-place award in Gartner’s “Gartner Eye on Innovation Awards for Power and Utilities 2024.” This project enabled the categorization of “Invoice Dispute” requests received by Enerjisa using an AI model, closing all dispute requests end-to-end with RPA. Consequently, 86% of customer applications were answered with a 99% accuracy rate, resulting in increased customer satisfaction and improved process efficiency. Another RPA project, the Document Understanding Project, earned UIPath’s 2024 AI25 Awards. Through the Document Understanding & RPA E-Invoice E-Archive Project, we analyse all e-archives and e-invoices received by Enerjisa Electricity Distribution companies using AI. These invoices are classified, with robots registering them in the SAP system for a total of 70 different classifications.

Developments in 2024

As we continue to implement our governance plan developed with a holistic approach throughout 2024, we progressed on our digital transformation journey with inputs from all business units. We are applying our sustainability framework to our digital transformation model and tracking how our projects impact society, the environment, and our business.

Since the inception of our E-TERNAL Digital Transformation Model, we have contributed with 371 projects under the impact-oriented business model heading, 15 projects under the societal impact heading, 15 projects under the planetary impact heading, and 175 projects supporting the foundations of our performance.

Moreover, we have realized numerous new digital projects particularly focusing on customers, operations, technology, and market needs. Some of the highlighted projects are detailed below.

Employee Focus: To support a digital, data-driven, and agile organization, we are contributing to processes through machine learning, artificial intelligence, and data analytics projects. By completing projects in Human and Culture processes, we have supported the end-to-end digitalization of these processes. In 2024, we launched our dedicated AI platform, EnGPT, where our employees can receive assistance from AI in various areas of expertise. In addition to specialized assistants for regulations, compliance, and legal matters, general-purpose assistants are also available on our platform. Additionally, we aimed to facilitate our employees’ meetings and make them more efficient and effective by offering another assistant, EnGPT Meeting Assistant, which helps with summarizing meetings and determining action items. We continue to enrich our EnGPT platform by adding AI assistants tailored to needs, creating a rich AI platform for our employees to use.

DIGITALIZATION

We aim to provide a more efficient, secure, and customer-centric service by maximizing customer experience, digitizing our business processes, and leveraging technology.

Standing by the Customer: With the Mobile Application & Online Service Centre (OHM) project, we aimed to maximize user experience, increase digital channel usage, and enhance customer satisfaction and loyalty. Additionally, we aimed to provide an optimal experience through digital channels for all transactions conducted through traditional channels that our customers frequently use (subscription, invoice payment, outage reporting, scheduling appointments at the nearest service centre, etc.), ensuring customers feel the same familiarity in the digital channel as they do in traditional channels. With the Çukurova MHM (Customer Service Centre) Self-Service Digital project, we aimed to allow our customers to access our Online Service Centre through tablets positioned within the MHM, enabling them to explore our channel and carry out transactions.

Through the WhatsApp Bot Project, we have improved our WhatsApp chatbot application, which is one of our digital customer channels, to comprehensively address customer requests and needs, thereby increasing satisfaction in this customer channel.

With the 186 Campus project, we have transitioned call centre training and quality processes to a mobile application, providing rapid access to information and timely feedback. Existing modules on the Call Centre portal have also been migrated to the mobile application, allowing ease of access regardless of location.

With our Call Centre Voice Assistant (VoiceBot) project, we are working to complete subscription, evacuation, outage, and appointment-related calls in our Distribution and Retail companies using an interactive, productive, AI-powered humanoid assistant. This project aims to create accurate, swift, and effective solutions while maintaining a high service level during exceptional situations and increasing customer satisfaction.

Enriched Sales: The D2D (Door-to-Door) Out-of-Region Sales Project is designed to increase the efficiency of our out-of-region sales and use our workforce more effectively. Our field personnel can perform transactions from their tablets for sales activities outside our region.

We have launched a separate CRM (Customer Relationship Management) Project for our Customer Solutions unit. The project integrates customer management, visits, offers, contract management, billing/collection, feasibility, and data collection processes and activities with other systems.

In the Out-of-Region Individual Sales Processes, the GB (Security Deposit) Automation project aims to automatically calculate security deposits for our individual segment customers' out-of-region sales, enabling real-time completion of sales transactions.

Supply Continuity: We continue to make improvements in our Outage Management System to ensure supply continuity in the field and minimize electricity outages.

With the North Star Project, we have developed an application that interactively displays points affected by disasters, updated energy statuses of these points, fed by data from remote areas and personnel before and during disasters. This application provides critical information for management reports. This project also enables rapid decision-making and action mechanisms for identifying energy-deprived inventories during disasters and reporting them to relevant authorities. This ensures timely action is taken to provide energy to affected areas as quickly as possible.

The Internet of Things (IoT) Project aims to minimize license and vendor dependencies by providing end-to-end encrypted, open-source solutions into the distribution company's digital inventory, enabling real-time monitoring, analysis, storage, visualization, and sharing with other systems that require it. The IoT project is designed to ensure that these appropriately collected data are analysed to contribute to decision-making and business development, particularly in the areas of network operations, investment, and energy management.

The E-Central application was developed to monitor renewable energy systems from a central platform, track production, monitor outages, and create work orders in the field.

Maintenance: To enhance the efficiency of our maintenance-repair operations, which play a crucial role in ensuring the continuity of service, we are continuing with our digitalization projects aimed at minimizing occupational health and safety risks and tracking and reporting field operations.

The Maintenance Captain Project involved the development of a mobile maintenance captain system used in the maintenance process, leading to the completion of operational improvements in the maintenance workflow. Enhancements made in the MCBS (Mobile Geographic Information Systems) and ERP systems have enabled more effective and efficient management of the maintenance process.

Asset Management: We continue to implement projects centred on Geographic Information Systems (GIS) to ensure optimal management of field assets and improve data quality.

In the scope of our digitalization framework, one of the projects we implemented is the Android GENII project, which aims to enhance the integration quality of future digitalization projects in our network, improve supply continuity, and customer satisfaction while ensuring that field operations are performed with the most current and rapid technologies.

The Earthquake and Natural Disaster Project aimed to inspect the Turkish electricity distribution network against earthquakes and other natural disaster scenarios, conduct potential performance analyses post-earthquake, and develop emergency action plans.



Through the Document Management System Application Project, we established a digital archive for tender documents, ensuring quick and complete access to documents whenever needed, increasing work efficiency through system integrations, retaining documents ready for requested audits, and facilitating access.

The Communication Device Tracking Project successfully updated the electrical addresses of customer, lighting, and transformer OSOS (Automatic Meter Reading System) devices based on their initial installation, dismantling, and demolition processes, and this information is displayed in the network connection model.

Safety First: Occupational Health and Safety (OHS) is one of our top priorities. Through the digitalization projects we implemented with an OHS focus, we aim to minimize risks that could lead to workplace accidents and ensure that employees perform their field operations under the highest safety measures.

With the Kuzgun-Electric Security Systems project, we aim to monitor Electronic Security Systems within Enerjisa Distribution Companies through a Central Management Software, conduct control operations according to authority limitations, create an integrated structure, and ensure that existing systems are updated/revised for effective management of breakdowns and maintenance processes.



DIGITALIZATION

On our digitalization journey, we are leveraging the power of data to achieve operational excellence and to provide our customers with faster and more effective service.

Data-Oriented Operations: We continue to implement many analytical projects to strengthen our data-driven operational capacity. To enhance data quality, we have conducted numerous data optimization and infrastructure activities to date.

Through the OGSS Data Synchronization Project, we have ensured the accuracy and synchronization of data related to outages, enhancing data reliability. Additionally, with the Digitalization of New Connection Field Processes Project, we transitioned new connection processes that were previously manual and paper-based into a digital platform, streamlining processes and facilitating customer operations and new connection activities.

Energy Market: We are continuously adapting our energy management forecasting and market operations to align with the sector's future through our digitalization investments. Through the Projects on Price Forecasting Models and Visualization, Long-Term Demand Forecasting, and Automation of Reconciliation Reports, we aim to enhance the efficiency of our market operations.

Digital Finance: Our aim is to increase efficiency and create value by managing financial processes with advanced digital technologies within the context of digital finance. In this regard, we are targeting to implement a structure that considers financial

risks in our digitized processes. With the completion of the projects, we have automated processes, minimized error rates, enabled faster reporting infrastructure, improved supervision of risk controls, and achieved resource efficiency.

Our e-Books, e-Invoice, and e-Archive focused projects not only register documents digitally but also digitize previously manual document processes, ensuring quality documentation. We utilized RPA technology in the processes of Automatic Recording of E-Invoices, Receivables Management, and Collection Management. Through these inter-system integration projects, we ensure both time savings and operational efficiency.

M2C Journey: We continue to implement digitalization projects aimed at improving operational efficiency and ensuring effective resource utilization. In the upcoming periods, we aim to support our operational excellence target with Hyperautomation projects and RPA integrations while addressing our customers' requests and needs more swiftly and efficiently.

As part of our efforts to strengthen operational business processes, we launched the "OPERA" project, aiming to respond to customer applications with AI-powered robots. This project has significantly improved application evaluation period and was recognized as the top project among 128 initiatives in the EMEA region, earning the prestigious "Gartner 2024 Eye on Innovation Awards for Power & Utilities."

The End-to-End SSB (Industry Registration Certificate) Automation project has been designed to allow customers to fill in necessary information related to the certificate online, with automation and reporting processes carried out via the system.

Customised Solutions: It is increasingly critical that data be processed, monitored, and take its place in decision support processes at the right time within operational processes. In this regard, we launched the "E-Central" Project under Enerjisa's "Energy of My Business" Model to meet the need for real-time tracking and reporting of assets and operations. E-Central aims to enable centralized monitoring, reporting, and management of energy efficiency systems installed.

With our Mobile Wallet & Payment Platform, we offer our customers new payment solutions that facilitate payment of bills, prepayment, payment with points, money transfers, and other related transactions. The

Single Page PSS (Retail Sales Contract) project aims to deliver PSS and its annexes through SMS and email to customers from physical channels, ensuring a single-page printout can be obtained, signed by customers, and archived.

Technological Infrastructure: We increase our annual investments in technology infrastructures to ensure compliance with the latest technologies and improve our processes, providing quicker and more effective responses to our customers. Through our SAP S/4HANA project at Enerjisa Customer Solutions, we transferred all processes and integrations from the existing R/3 system to the HANA system within 3.5 months. This project has redesigned our business processes while reducing system load and enhancing performance.

As part of our SAS Modernization project, we transitioned from the SPDS system to the Vertica database, compatible with the latest technologies. This upgrade led to a 95% reduction in disk capacity. Additionally, the modernization project includes an upgrade from SAS EG 9.4 to the most current version, SAS VIYA. This upgrade added recording and monitoring capabilities, allowing us to utilize a more controlled system. Processes within the system have been optimized, leading to a 40% improvement in performance.

We also executed one of our infrastructure updates for our BW system, transitioning seamlessly from the BW on HANA 7.50 system to the BW/4HANA system, achieving significant performance gains in data processing, accelerating operational processes through new reporting and management tools, and establishing infrastructure that will enable future transitions to cloud-based systems.

With the New Database Transition Project, we have improved application performance and completed the transfer of all SAP applications to the HANA database and non-SAP applications to suitable open-source databases as part of budget optimization.

Infrastructure improvements in databases and server environments have resulted in performance enhancements ranging from 2 to 50 times. This enhancement positively influenced user experience and processing times.

We continue investments in cloud technology, and the platform has been actively utilized. Our largest mobile application, Enerjisa Mobil, has also gone live. Furthermore, our first Kubernetes platform has been established through this application.

Thanks to the studies conducted on our SAP systems, optimizations have been made regarding test data sizes, resulting in storage savings.

A new infrastructure has been established to renew the platforms (middleware) that facilitate communication between our systems. Critical processes from our previous platform have been migrated to faster, newer platforms. Particularly, new methods employed for transactions performed via SAP systems have significantly reduced development times.

The New Field Mobile-AOB project has been implemented to ensure the swift response of Android applications used in field processes through redesigning with new infrastructure.





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SUSTAINABILITY GOVERNANCE AND PERFORMANCE

Sustainability is at the core of our business and integrated into our entire organization.

Enerjisa Enerji believes that sustainably managed companies are better equipped to address customer needs, utilise resources more effectively, and adapt more flexibly to mega trends, as well as to manage risks and opportunities more efficiently. Furthermore, reflecting stakeholder expectations, the disclosure of non-financial Key Performance Indicators (KPIs) and targets has become more important.

Enerjisa Enerji views sustainability as an important element of its equity story and a critical tool for effective strategic management. The Company integrates sustainability in all its processes, and strives to raise its compliance with global environmental, social and governance norms and standards. In addition, the Company continues to invest in raising social awareness for ESG issues.

As a pioneer for the energy sector in the Corporate Governance and Risk Management, Occupational Health and Safety (OHS) and Environmental Management areas, Enerjisa Enerji stays abreast of global sector and ESG trends, stakeholder expectations and new developments to further improve its ESG performance, and aims to lead the energy sector in this area, both in Türkiye and the world. Accordingly, Enerjisa Enerji conducts activities within a sustainability strategy aligned with this goal.

SUSTAINABILITY FRAMEWORK

Our Sustainability Strategy

We are aware that decarbonization, urbanization, customer centricity, deregulation, decentralization, and digitalization are the five sectoral trends that disrupt our way of doing business. Therefore, we are developing innovative, impactful, and sustainable products and services not only to better face the ongoing challenges but also to lead the energy sector transformation while working for accessible and uninterrupted energy.

As a leading electricity distribution, retail, customer solutions and e-mobility company in Türkiye, we take over responsibility for delivering prosperity to people and the future. Our purpose is shaping and connecting the new energy world as a role model and continue being a provider of public service to millions.

Our Approach to Sustainability

Sustainability is at the core of our business and integrated into our entire organization. Placing sustainability at the forefront of its operations, the Company focuses on the impact of its products and services, and methodically researches avenues for the industry-wide transition to a low-carbon energy sector. Additionally, we advocate for equality among all individuals and uphold the right to life and developmental potential for every living being, today and in the future.

With the ultimate aim of becoming an impact-oriented business, we prioritized our environmental, social and governance impacts, and updated our Environmental, Social and Governance (ESG) targets. We defined our company's short, medium and long-term ESG targets by associating them with the Sustainable Development Goals in line with our strategy. Our road map to achieving these targets is aligned with this strategy and in accordance with the United Nations Sustainable Development Goals (SDG).

We established a systematic governance structure for sustainability, including thematic working groups, and disclosed comprehensive policies on our sustainability topics. We adhere to these policies while working towards our goals, and we monitor, measure and report our results and progress in a transparent manner.

Not only is Enerjisa Enerji at the centre of the energy transformation, but the Company is also an important part of our country's decarbonization road map.

Enerjisa Enerji's Role and Commitment to Decarbonization

We, as the leading power company in Türkiye, reach to over 22 million people in 14 provinces by distribution and retail. We play a central role in energy transition nationwide with our energy solutions.

SUSTAINABILITY FRAMEWORK



SUSTAINABILITY GOVERNANCE AND PERFORMANCE

Our responsibility towards the environment is a fundamental component of our strategy.

We position ourselves as a driver of societal decarbonization, through our power grid operations, services and products that enable a cleaner, smarter and more sustainable way of living.

Within the scope of our strategy and sustainability framework, we attach significance to setting rational targets, improving all our business processes and taking action along the Decarbonization Journey.

To tackle climate change and ensure a better future for everyone, we acknowledge the Intergovernmental Panel on Climate Change (IPCC)'s Call to Action1 for limiting the global warming to 1.5°C and in step with society's progress towards the goal of UN Paris Agreement on climate change, we commit to aligning our business with a Net Zero Pathway by 2050.

Until 2030 we commit to reduce our Scope 1 and 2 emissions by 30% and our emission intensity of sold electricity related to our scope 3 emissions by 40% compared to the baseline year of 2021.

In addition to our emission targets, we acknowledge that gender equality is an accelerator of climate action. The full, equal and meaningful participation of women in the clean energy transition would be instrumental to a greener and more sustainable future.

Baseline Year

We have improved and expanded our reporting scope and methodology for 2021 emission data, therefore we have

chosen 2021 as the baseline year for the absolute emission reduction and emission intensity reduction targets in order to reflect the impacts of our decarbonization initiatives more accurately. The emission baseline year provides a benchmark to compare any variations in emissions output throughout a reporting period and the targets.

Enablers and Foundations of Our Performance

To enable our purpose and achieve our targets, we put people and culture and digital transformation at the centre of our business. We are dedicated to continuously investing in them as they are essential resources and tools to create value in our impact areas.

We believe that strong corporate governance, compliance, integrated risk management and internal control mechanisms, and effective stakeholder engagement are the backbones for sustaining our performance. We focus on engaging with our stakeholders regarding our impact and performance.

Sustainability Governance Structure

Since 2019, Enerjisa Enerji's governance structure has underpinned the development of a strategic and holistic approach to economic, environmental and social factors that is designed to create long-term value. The Board of Directors is pivotal in defining the Company's sustainability strategy, identifying ESG material issues, risks, and opportunities, and establishing appropriate ESG policies.

The Sustainability and Corporate Capabilities function, created in 2021, maintains a strategic and integrated approach to corporate sustainability, maximizing stakeholder value. Under the Sustainability and Core Capabilities Function, Enerjisa has a dedicated Sustainability Department, Environment Departments, and Occupational Health and Safety Departments (HSE). The HSE Departments working under the distribution and sales business units of Enerjisa have access to the CEO through the Head of Distribution Business Unit and the Head of Sustainability and Corporate Capabilities Function.

The Executive Management (CEO/ CFO) oversees ESG-related actions in all processes, and reports to the Board of Directors regarding critical initiatives, developments, key performance indicators and commitments.

Upper management is also directly involved with the voluntary ESG-related committees, the Sustainability Executive Committee, and Thematic Sustainability Working Groups. To support the Board of Directors, Enerjisa has established several key committees, such as The Audit Committee, Early Risk Detection Committee, and Corporate Governance Committee all of which are Board of Directors' Committees. All of the Board of Directors' Committees are authorized to make decision to buy services from consultancy firms, external auditors, or other experts to ensure that committees carry out their responsibilities

Sustainability Executive Committee is chaired by the Head of Sustainability and Corporate Capabilities and comprises all unit heads; this committee directly reports to senior management, including the CEO and CFO. Its primary role is to shape and advance the corporate sustainability strategy, ensuring adherence to best practices and monitoring the Company's ESG impacts. The committee meets at least four times a year to review performance, deliberate on strategic initiatives, and provide advisory decisions to guide the Company's sustainability efforts. As part of the sustainability calendar, CEO & CFO briefings and Sustainability Executive Committee meetings ensure that review and approval processes by senior management are consistently conducted. Key responsibilities include advising on sustainability

strategies and organizational structure, monitoring ESG impacts, assisting in decision-making processes, designing sustainability roadmaps and targets, defining performance metrics, fostering a sustainability culture, and ensuring company-wide participation in ESG discussions. The committee can invite relevant managers, engage external consultants, and establish sub-committees for specific tasks. Meetings are conducted to clarify and follow up on decisions, with reports submitted to the Board of Directors to bolster sustainability initiatives. In 2024, the committee met five times to address key sustainability issues, initiatives, and various written circulations.

Established in 2022, the Enerjisa Diversity, Equity, and Inclusion Committee operates to determine and implement our Company's DEI strategies. Our Committee

encourages our employees to report any actions that may be subject to discrimination and maltreatment in line with the principles of confidentiality and ensures that necessary actions are taken. The Chairperson of the Committee serves as the Head of the Sustainability and Corporate Capabilities, and the approved decisions and actions are regularly reported to the Sustainability Executive Committee. The committee met five times in 2024.

Our committees carry out their responsibilities systematically, actively monitoring ESG-related issues and submitting pertinent reports to the Board of Directors. The committees include representatives from relevant business units, ensuring company-wide participation in ESG-related discussions and decisions.

Board of Directors Committees

- Corporate Governance Committee
- Early Risk Detection Committee
- Audit Committee
- Sustainability Executive Committee

Other Committees

- Executive Committee
- Finance Committee

ESG-Related Committees and Working Groups

Thematic Sustainability Working Groups

- TCFD (Task Force on Climate-related Financial Disclosures) Working Group
- IRS (International Reporting Standards) Working Group
- Biodiversity Working Group
- EU Taxonomy Working Group
- Scope 3 Working Group
- Circularity Working Group
- Diversity, Equity and Inclusion Committee
- Ethics Committee
- Health and Safety Committee
- R&D and Innovation Committee
- Social Management and Monitoring Committee
- Customer Experience Committee
- Regulation Committee
- Revenue Assurance Committee
- Crisis Committee
- Human Resources Committee
- Personal Data Protection Committee



SUSTAINABILITY GOVERNANCE AND PERFORMANCE

We strive to operate as a **transparent, ethical and principled** company in line with our corporate governance structure.

ESG Performance

While carrying out activities to successfully integrate sustainability, Enerjisa Enerji strives to operate as a transparent, ethical and principled company in line with its corporate governance structure. Reporting ESG data within this framework, the Company received assurance for important ESG indicators in 2024.

In 2024, we raised our Carbon Disclosure Project (CDP) Climate Change score to A and kept our CDP Water Security score as A, securing our place in CDP Global A List.

2024 ESG Performance

CDP Climate Change	Reporting Date: 2024
	Rating Scoring Range: D-, D, C-, C, B-, B, A-, A
	Enerjisa Enerji Rating: A
CDP Water Security	Reporting Date: 2024
	Rating Scoring Range: D-, D, C-, C, B-, B, A-, A
	Enerjisa Enerji Rating: A
FTSE Russell	Reporting Date: June 2024
	Rating Scoring Range: 0 - 5
	Enerjisa Enerji Rating: 4
	Sector Ranking*: 91 st percentile in Utilities sector
Corporate Governance Rating	Reporting Date: December 2023
	Rating Scoring Range: 0-100
	Enerjisa Enerji Rating: 96.32
Refinitiv	Reporting Date: March 2024
	Enerjisa Enerji Rating: Overall 85/100 (Environment: 81, Social: 88, Governance: 90)
	Sector Ranking: 5 th out of 317 Electric Utilities & IPP Companies
Bloomberg Gender Equality Index	Reporting Date: September 2022
	Rating Scoring Range: 0-100
	Enerjisa Enerji Rating: 79,41***
Sustainalytics**	Reporting Date: April 2024
	Rating Scoring Range: ESG Risk Rating Overall Score Range (Negligible/Low/Medium/High/Severe)
	Enerjisa Enerji Rating: Low Risk
	Enerjisa Risk Score: 16.8
	Sector Ranking: Among the top 7% of 271 electricity distribution sector companies.

* The FTSE overall ESG rating is represented as a percentile where "1" indicates that a company is in the bottom 1% and "100" indicates a company is in the top 1%.

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*** Enerjisa Enerji has become one of the 12 companies from Türkiye included in the Bloomberg Gender Equality Index, which includes 484 companies from 11 different sectors and 45 countries. 2023 results has not been announced yet.



IMPACT FOR PLANET

We have adopted a proactive, **environmentally responsible and respectful approach** across all our operations, in accordance with the relevant legislation and the principle of voluntarism.



Özkan Öztürk
Customer Services Team
Manager (Zonguldak)

The motto "A Better Future" reflects goals and visions centred on sustainability, environmental awareness, societal contribution, and innovative energy solutions. This motto emphasizes that Enerjisa not only provides energy but also aims to add value to the future by using energy resources efficiently and investing in clean energy technologies. In an era where the significance and necessity of addressing climate change, energy efficiency, and renewable energy sources grow every day, the motto highlights Enerjisa's commitment to reducing environmental impacts and making energy access more sustainable for society.

Broadly speaking, "A Better Future" represents a vision that considers not only individuals but also our planet, aiming to create a more livable world for all.

Human-caused environmental problems, e.g., climate change, environmental pollution, consumption of natural resources, and loss of biodiversity, are increasingly impacting the world. The COVID-19 pandemic, which started at the end of 2019, further highlighted the importance of healthy, safe and environmentally friendly operations. The pandemic presented clear evidence that our natural resources are limited, and that business continuity is unachievable in a world where the climate and biodiversity are not protected. Consequently, it underscores the necessity of balancing conservation and consumption in the course of any economic developments.

Enerjisa Enerji is aware that adverse impacts to the environment and economy will be irreversible unless we tackle climate change, manage our limited resources correctly, and take the measures necessary to preserve ecosystems and biodiversity.

Subsequently, the Company has adopted a proactive, environmentally responsible and respectful approach across all its operations, in accordance with the relevant legislation and the principle of voluntarism.

- As part of its Environmental Management System, Enerjisa Enerji manages risks accurately, seizes appropriate opportunities, and consistently improves its environmental performance with a particular focus on mitigating the adverse environmental impacts of its operations. Accordingly, the Company assumes responsibilities

beyond the requirements decreed by the legislation in its relations with contractors and suppliers. In addition, Enerjisa Enerji encourages its stakeholders to adopt environmental best practices, and closely monitors their environmental performance in line with the Company's environmental sustainability goals.

- As Türkiye's leading electricity distribution, retail sales, e-mobility and customer solutions business, Enerjisa Enerji plays a central role in the country's nationwide energy transformation and decarbonization by means of its efficiency solutions.
- Enerjisa Enerji acts as a driver of social decarbonization through its electricity grid operations, and services and products that enable a cleaner, smarter, more sustainable and digitally driven manner of living.
- Enerjisa Enerji sets rational targets within the scope of its strategy and sustainability framework, including improving all business processes and taking appropriate action along the Decarbonization Journey.
- To tackle climate change and ensure a better future for everyone, we acknowledge the Intergovernmental Panel on Climate Change (IPCC)'s Call to Action¹ for limiting the global warming to 1.5°C and in step with society's progress towards the goal of UN Paris Agreement on climate change, we commit to aligning our business with a Net Zero Pathway by 2050. Until 2030 we commit to reduce our Scope 1 and 2 emissions by 30% and our emission intensity of sold electricity related to our scope 3 emissions by 40% compared to the baseline year of 2021.

Our 2025 target for absolute Scope 1 and 2 emissions reduction is 10% and emission intensity target of Scope 3 related sold electricity is 25% reduction.

- Acknowledging that gender equality is an accelerator of climate action, the Company believes that full, equal and meaningful participation by women in the clean energy transition is a driving force for a greener and more sustainable future.

Environmental Policy & Management System

Enerjisa Enerji adopted its Environmental Policy to monitor and minimize all direct and indirect environmental impacts of its operations. The Company conducts innovative activities and implements various practices to manage its environmental impacts.

Operating under the Distribution Business Unit, the Occupational Health, Safety and Environment Department is responsible for environmental issues and reports to the Head of the Distribution Business Unit, working under the CEO. Operating under the Retail and ECS Business Units, the Occupational Health, Safety and Environment Department reports to the Head of Sustainability and Corporate Competencies Department, working under the CEO; operating under the E-Mobility Business Unit, the Occupational Health, Safety and Environment Department reports to the General Manager, working under the CEO.

In 2024, as part of the Company's ISO 14001 Environmental Management System and environmental sustainability compliance activities, Enerjisa Enerji set goals in pollution prevention; circular waste management; environmental impact management in line with the life cycle principle; and resource efficiency (recovery of electricity, fuel, network assets), and achieved improvements to reach these goals.

The ISO 14001 Environmental Management System is implemented at all Enerjisa Enerji locations. In 2024, external audits were conducted by a globally accredited independent organization to ensure



the effectiveness and continuity of the management system. In 2023, the ISO 50001 Energy Management System, the ISO 14001 Environmental Management System and ISO 45001 Occupational Health and Safety Management Systems were integrated into Enerjisa Enerji Distribution Business Units. In 2024, all preparations have been completed for the ISO 50001 Energy Management System, ISO 14001 Environmental Management System and ISO 45001 Occupational Health and Safety Management Systems for our EHS business unit to be ready for new certification and the external audits process will be followed in 2025.

To improve its environmental performance, Enerjisa Enerji continued collaborations with non-governmental organizations in 2023, participating in the TÜSIAD

Environment and Climate Change Working Group and the Circular Economy Sub-Working Group. Also in 2024, the Company maintained its contribution to the Environmental Working Group of the Electricity Distribution Services Association (ELDER). Established in 2021, the Environmental Working Group of ELDER, aims to promote collaboration and consistency across the environmental management practices of electricity distribution companies.

In 2024, Enerjisa Enerji did not face any penalties from the Ministry of Environment, Urbanization and Climate Change or any other local authority as per Environmental Law No. 2872.

Enerjisa Enerji Environmental Policy is available on the Investor Relations website.



IMPACT FOR PLANET

With its pioneering practices in energy efficiency and emissions management, Enerjisa Enerji is working towards a sustainable future.

Energy Efficiency

In awareness of the significant role that the Company plays in addressing climate change, Enerjisa Enerji aims to minimize the direct and indirect impacts of its operations. Thus, the Company regularly monitors its energy consumption, makes efficiency-oriented investments, and mitigates the environmental impacts of its operations.

Enerjisa Enerji carries out all operations as per its Energy Management Policy and, in line with this policy, strives to create added value through its activities.

Continuous monitoring and assessment of energy performance across all business units ensure that our energy efficiency strategies are not only effective but also adaptable to changing circumstances. Reliable data collection and analysis

enable us to calculate reductions in energy consumption and maintain a sustainable decrease in energy usage over time.

As pledged in our policies, we monitor our actions directed towards the efficient use of energy in a systematic and quantifiable manner, and contribute to the protection of natural resources and the environment. Through our effective energy management efforts, we are tackling climate change, the foremost global environmental problem.

Enerjisa Enerji Energy Management Policy is available on the Investor Relations website.

Emissions

Enerjisa Enerji monitors its emissions under Scope 1-2-3. The Company constantly reviews and improves the reporting methodologies in order to meet its stakeholders' expectations of transparency and consistency.

The Scope 1, 2 and 3 data of Enerjisa Enerji were verified for 2023 and disclosed in the 2023 Sustainability Report. The calculations for 2024 emissions are ongoing and will be disclosed in the Company's 2024 Sustainability Report.

The Company carries out innovative activities and puts into operation various practices to manage the environmental impacts:

Scope	Practices to Reduce Emissions	Impacts of the Practices
Scope 1	<p>These emissions include direct GHG emissions associated with the resources owned or controlled by the Company such as fuel consumption, company vehicles and fugitive emissions, etc.</p> <p>Fleet Vehicles/Fuel Consumption Enerjisa Enerji has included hybrid and electric vehicles in its administrative vehicle fleet instead of diesel vehicles and aims to continue this.</p> <p>With the completion of the driver tracking system for the fleet vehicles of the distribution business unit, the requirements of the vehicles in the fleet will be tracked; thus, the number of vehicles and, accordingly, fuel consumption will be reduced.</p>	<p>Fleet Vehicles/Fuel Consumption Retail business unit: In 2024, 55 electric/hybrid vehicles were included in the fleet, and the share of electric and electric/hybrid vehicles in the administrative vehicles fleet increased from 43.6% in 2022 to 44% in 2024.</p> <p>Distribution Business Unit: 107 electric/hybrid vehicles (104 electric, 3 hybrid) were added to the fleet in 2024, bringing the total number of electric and hybrid vehicles to 351.</p>
Scope 2	<p>Scope 2 emissions include indirect consumption due to electricity, heat or steam purchased and consumed, and emissions due to theft-loss</p> <p>Enerjisa Enerji has the goal to reduce its Scope 2 emissions by purchasing energy from the renewable resources for its energy consumption.</p> <p>The electricity consumption is closely monitored in order to boost efficiency through root-cause analysis and rehabilitation projects.</p>	<p>In 2023, 100% of the energy use outside the Distribution business unit, 98.49% of the energy use of the Distribution business unit and 98.68% of the energy use of Enerjisa total was covered by green energy supply. In 2024, 100% of the energy use outside the Distribution business unit was covered by green energy supply. 2024 consolidated data will be given in the 2024 Sustainability report</p> <p>In 2020, a pilot project was initiated in the distribution business line (98 buildings) to monitor electricity consumption in real time via the AMRS system.</p> <p>After expanding the project to other regions in 2024, the number of buildings, in which electricity consumption is monitored in real time via the AMRS system, reached 153.</p>
Scope 3	<p>These emissions include indirect emissions associated with the resources that are not owned and cannot be directly controlled by the Company, such as, business travels, procured goods and services, activities associated with fuel and energy, etc.</p>	<p>In December 2020, the very first bilateral agreements (Power Purchase Agreements - PPA) were signed to supply electricity directly from the power plants that generate electricity from renewable energy resources.</p> <p>Solutions for Customers (Indirect Impacts)</p> <p>Sustainable Waste Management: Enerjisa's Material Quality Control and Recycling Test Centres target important environmental materials such as distribution transformers, switchgears and circuit breakers for recycling.</p> <p>Green Energy Solutions: With 2 types of certificates, it is aimed to provide greenhouse gas emissions from the electricity consumption of the customers from emission free green sources.</p> <p>Lighting Conversion Solutions: In 2024 and before, a LED conversion project consisting of 48,634 luminaires was initiated with the Energy Performance Contract (EPC).</p> <p>Process Efficiency Projects: The first compressor replacement project in 2024 was implemented with the EPS model with Brisa, one of the Sabancı Group companies.</p> <p>CHP and CCHP Solutions: Cogeneration and trigeneration facilities with total installed capacity of 3.8 MWe is in operation..</p> <p>Renewable Energy Solutions: In 2024, 72.9 MWp SPP was put into operation and the total installed capacity reached 102.5 MWp.</p> <p>Enerjisa Enerji Digital Channels Thanks to the digital and remote application channels developed for the retail business unit, the need for customers to visit physical channels are expected to be reduced.</p> <p>Digital Application System in New Connection Annually, 45 operation centres under the three distribution companies of Enerjisa Enerji receive over 100,000 connection application with the documents specified in the regulations. Thanks to the update commissioned in August 2021, applications for new connections can be submitted online and 24/7 via ybp.eedas.com.tr.</p>

IMPACT FOR PLANET

Enerjisa Enerji, with a zero waste goal in waste management, ensures the efficient use of resources by adopting circular economy principles.

Circularity Approach and Waste Management

To improve our circularity performance, we will act in line with circular pillars to minimize waste, maximizing the lifespan of goods through promoting reusing, refurbishing and recycling.

We focus on sustainable use of resources across all operations in collaboration with our value chain partners, as our ambition is not only to deliver electricity efficiently, but also contribute to a more sustainable and circular future.

Circularity holds immense importance, offering numerous economic, environmental, and social benefits. At Enerjisa, we recognize the critical role that waste management plays in shaping sustainable outcomes. Our commitment to aligning waste management practices with both national and international standards aims to reduce negative impacts while fostering a sustainable future. By focusing on preventing waste generation at its source and recycling what is produced, we acknowledge the significant implications of waste management on economic development, environmental preservation, and human rights. Collaborating with licensed local companies creates employment opportunities and contributes to local economic growth. Our Material Recovery unit is dedicated to recycling materials that have substantial environmental impacts. Collaborating with licensed local companies creates employment opportunities and contributes to local economic growth.

In terms of waste management, Enerjisa Enerji operates in compliance with the relevant legislation, and OHS and Environmental Policy, as well as international standards. The Company has defined the methods for prevention and reduction at the source as collection, transportation, storage and recycling and/or final disposal of domestic, industrial, and hazardous and non-hazardous wastes from its activities, in accordance with the waste hierarchy.

Enerjisa Enerji improves its Waste Management System, which was designed in compliance with ISO 14001, in line with the relevant legislation, as well as the announced sustainability goals. The Company carries out all material usage and waste management with the purpose of mitigating environmental impacts and contributing wastes to the circular economy through the life cycle approach. Enerjisa is driven by the ambition to adopt circular economy principles and pursue waste management from a sustainable perspective. Rather than relying on traditional methods, we actively participate in the Zero Waste Movement, undertaking activities to reduce waste, separate it at its source, and raise awareness about waste management across our locations. By the end of 2030, our goal is to establish a Zero Waste system in all our locations and complete the Basic Level Zero Waste certification process. The sustainable use of natural resources is supported in 14 provinces where distribution companies operate by implementing a zero-waste management

system in the headquarters and operations buildings. Thus far, we have successfully implemented a zero-waste management system as Retail Business Unit in our Head Office, two Regional Directorates, and seventeen Customer Service Centre buildings across 14 provinces, with twenty locations already awarded the Basic Level Zero Waste Certificate. To further promote the "Zero Waste" approach, we continue to provide training and engage in waste minimization activities across all business units

At Enerjisa Enerji, the following methods are used for waste management.

Hazardous Waste Management: Hazardous wastes are stored in accordance with the legislation and disposed of by licensed recycling companies. Enerjisa Enerji built eight Logistics Services Centres Hazardous Wastes Temporary Storage Areas in various cities, in compliance with the legislation, for wastes generated by the Company's distribution operations. Hence, Enerjisa Enerji separates wastes at the source, stores recyclable/recoverable wastes, and delivers wastes to authorized waste disposal companies.

Enerjisa Enerji holds Hazardous Waste Temporary Storage Permits for all its sites and annually renews the Dangerous Goods and Hazardous Waste Compulsory Liability Insurances that are legally required for all storage areas in which hazardous wastes are temporarily stored. In 2024, a total of 3,660.8 tonnes of hazardous waste was generated at the Company's facilities, of which 3,565.5 tonnes were sent to recycling facilities.

Non-Hazardous Waste Management: Non-hazardous wastes are also separated at the source, stored if recyclable/recoverable, and delivered to authorized waste disposal companies. In 2024, a total of 74,314.8 tonnes of non-hazardous waste was generated at the Company's facilities, of which 74,309.8 tonnes were sent to recycling facilities.

- **Grid Wastes:** Enerjisa Enerji places utmost importance on enabling the contribution of operational wastes into the circular economy. The Company enables the adequate collection of network wastes from distribution activities, the re-use of these wastes if and to the extent possible, the storage of these wastes in line with the legislation, and the disposal of wastes by licensed recycling companies in order to reduce resource utilization and to control environmental impacts through the life cycle mentality. Accordingly, Enerjisa Enerji passes its grid wastes through the Material Quality Control and Recycle Test Centre processes to recycle them if and to the maximum extent possible.

- **Domestic and Recyclable Wastes:** Domestic and recyclable wastes are delivered to the related municipalities and the authorized companies of these municipalities' licensed waste management facilities.
- **Biodegradable Wastes:** Biodegradable wastes are recycled into compost at the HQs of AYEDAŞ, Toroslar Edaş and the operation centres of Erenköy, as well as the Marmara Region and Black Sea Region directorates. The compost is used as fertilizer in gardening activities. In 2024, as a result of the cooperation with Wastespresso, eco-friendly cups were started to be produced from our coffee waste generated in Enerjisa Ataşehir Head Office and Ayedaş Headquarter. In Ayedaş Office, disposable cups were removed and these upcycled multi-use cups have started to be used. Wastespresso micro waste management study indirectly prevented 602.96 kg CO₂e greenhouse gas emissions to the atmosphere from 572.75 kg of coffee waste produced by Enerjisa Ataşehir Head Office and Ayedaş Office in 2024.

- **Vegetable Oils:** Vegetable oil waste from the catering services of contractor activities are delivered to licensed companies to be disposed of as per the Waste Oil Control Regulation.
- **Medical Wastes:** Medical wastes generated at workplace healthcare units are managed in accordance with the Regulation on Medical Wastes and disposed of properly by the licensed company.
- **Zero Waste Practices:** Enerjisa Enerji aims to transition into a circular economic model with a zero waste approach. In addition to the Başkent EDAŞ Headquarter building of Enerjisa Enerji Distribution Business Unit, the number of buildings entitled to receive the basic level Zero Waste Certificate given by the Ministry of Environment, Urbanisation and Climate Change has reached 37, with 9 operational buildings in 14 provinces where zero waste management systems were

established in 2024. In 2024, zero waste management systems were installed for one Head Office, two Regional Directorate and seventeen Customer Service Centre buildings of the Enerjisa Enerji Retail Business Unit across 14 provinces. With the addition of these locations, the number of Enerjisa Enerji Retail Business buildings entitled to receive basic level Zero Waste Certificate reached 20.

We consider waste management to be a major environmental and material issue and, accordingly, we minimize our environmental impacts and contribute to the circular economy where feasible. Wastes are separated at their sources and transferred for recycling. Additionally, we sustain steadfast efforts to raise our employees' awareness regarding waste management.



IMPACT FOR PLANET

Enerjisa Enerji, with comprehensive action plans and projects for the conservation of biodiversity, protects natural habitats, **takes special measures for bird migration routes, and supports the sustainability of ecosystems.**

Other developments regarding Waste Management at Enerjisa Enerji are as follows:

Practices	
Reducing On-Site Consumption	<p>Water dispensers with treatment systems were begun to be used instead of plastic carboys in 170 locations operating under the Distribution Business Units. Thus, consumption of 550,000 plastic carboys was prevented per annum.</p> <p>By preventing the use of raw materials for PET plastic carboys -taking into account the life cycle, from the source to waste disposal- it can be observed that emissions and wasting the water and energy resources are prevented.</p> <p>Activities were initiated to end the use of disposable plastics at the Company buildings. In-house awareness-raising activities continue in order to prevent disposable plastic, paper and other similar wastes.</p>
Separation	<p>Waste separation practices were adapted to the Zero Waste Management System at all locations. Therefore, plastic, paper, metal, glass, biodegradable and non-recyclable wastes are collected separately.</p> <p>Distribution transformers, cells and circuit breakers in the Material Quality Control and Recycling Test Centres of the Company, which are among materials with significant environmental aspects, were recycled at targeted percentages. In 2024, a total of 917 distribution transformers, 322 switchgears and 155 circuit breakers were reused. This work contributed to environmental sustainability by reducing the need for natural resources through the recovery of materials in line with the principles of the circular economy. Hence, the environmental impacts were reduced at the production phases of these materials according to the principle of life cycle.</p>
Recycling/ Disposal	<p>Papers from certified industrial productions (Forest Certification) are used in all printers. Wastepaper is separated for recycling and delivered to the contracted local authorities to be recycled.</p> <p>The waste management plans are requested from the suppliers in accordance with their operations. Thus, the separated wastes are coordinated to be recycled or disposed in compliance with the legislation.</p> <p>After the second half of 2023, all Customer Services within the Retail Business Unit will reduce resource consumption and non-recyclable waste by switching from cardboard cups to glass cups. A transition plan is being prepared for the headquarters.</p> <p>To reduce paper use across all business units, we switched to double-sided printing on printers, thus benefiting the environment while contributing to forest preservation, and reducing carbon emissions and the consumption of natural resources.</p>
Circular Economy	<p>Activities are conducted according to a waste hierarchy in compliance with the latest regulations per Environmental Legislation and circular economy principles. A circular economy road map was created within the scope of the ongoing Net Zero Project.</p>

Biodiversity

Enerjisa Enerji demonstrates its commitment to minimizing the environmental impact of its operations and contributing to sustainability goals by prioritizing the protection of biodiversity. During all our activities, we continue to work to protect natural habitats, prevent the destruction of forest areas and preserve the integrity of ecosystems. In this context, the environmental impact of its activities has been assessed through ecosystem risk assessment reports prepared by experts, and actions have been taken accordingly. In cooperation with the European Bank for Reconstruction and Development (EBRD), Enerjisa Enerji developed a comprehensive Biodiversity Action Plan for three distribution companies. This plan provides a framework, based on scientific and technical studies, in accordance with the EBRD's Guidelines for the Conservation of Biodiversity and the Sustainable Management of Living Natural Resources, to protect natural habitats and ensure the sustainability of ecosystems.

Efforts to mitigate the impact of distribution companies' activities on biodiversity are supported by action plans, Ecosystem Risk Assessment, and Bird Protection Plan. The Ecosystem Risk Assessment analyses existing biodiversity elements and natural habitats in the operation areas to identify potential environmental impacts and develop strategies to mitigate them.

The electricity grid operated by Ayedaş, Toroslar, and Başkent electricity distribution companies intersects with key migratory bird routes, creating a special responsibility for wildlife protection. The ornithological studies carried out within this scope have examined in detail the two major bird migratory routes of international importance in Türkiye (Western Palearctic and African-Eurasian migratory routes) and the intersection points of these migratory routes with the electricity grid.

The purpose of the Enerjisa Enerji Biodiversity Conservation Action Plan is to comply with international obligations arising from the European Convention for the Conservation of Wildlife and Habitats (BERN), the Rio Convention on Biological Diversity, and the provisions of the Convention on the Protection of Wetlands (RAMSAR), to which Türkiye became a party in 1994, and the EU Habitat and Bird Directives, along with legal requirements arising from national legislation.

Actions identified under the Framework Biodiversity Conservation Action Plan are as follows:

- The diversity and characteristics of ecosystems in distribution areas have been defined and, within this framework, biodiversity inventory and protection measures have been included in the action plan.
- The vulnerability, rarity and conservation status of living species have been identified.



IMPACT FOR PLANET

As our objective is to minimize our impacts, we consider biodiversity a strategic priority both in our day-to-day and business decisions.

- Biodiversity Impact Assessment was prepared specific to geographical conditions of three distribution regions to monitor and manage mitigation activities, assessing the potential impacts of electricity distribution on ecosystems and related habitats. Additionally, Biodiversity Procedure has been developed to ensure the protection and sustainable management of biodiversity in areas affected by our activities.
- Enerjisa Enerji takes all necessary measures to protect existing biodiversity across all its activities and complies with relevant legal regulations. The Company monitors and analyses environmental risks in its fields of activity and makes plans to minimize its impact. All Company facilities are evaluated for potential impacts.

Enerjisa Enerji has conducted the following projects for the protection of biodiversity.

- **The High Voltage Aerial Line Insulator Project** aims to address the dangers faced by winged fauna, particularly migratory birds, that may face the risk of electrocution when landing, nesting, or entering between two conductors on distribution networks. Such interactions can result in accidents causing the death of many birds. At the end of 2017, insulators were installed on certain power lines as part of the High Voltage Line Insulator Project. Toroslar EDAŞ continued its

efforts against bird strikes in 2024, especially during migration, in regions including Adana, Gaziantep, Hatay, Kilis, Mersin, and Osmaniye. Hosting millions of migratory birds annually, Hatay, Adana, and Mersin, where global bird migration routes intersect, Toroslar EDAŞ maintained its collaboration with the Nature Association to protect all the birds sharing the sky with its overhead lines. Through this cooperation, insulation materials were installed for more than 27,000 meters of conductors and approximately 8,500 insulators on lines that could cause bird strikes, particularly in areas with intense migration, in 2024.

- **Bird Spikes:** In 2024, approximately 11,500 bird spikes were installed on electricity poles, transformers and power lines in order to prevent birds from being damaged by contact with power lines in the electricity distribution infrastructure. Enerjisa Customer Solutions, as a partner in the field of Solar Power Plants (SPP), offers a business model tailored to companies, ensuring they achieve energy savings. At the same time, the company places great importance on preserving biodiversity in SPP areas established across Türkiye, minimizing potential negative impacts on natural ecosystems. The company conducts inspections on the sites with flora and fauna experts and identifies appropriate integrated methods for weed control.

Enerjisa remains steadfast in its commitment to minimizing the environmental impact of its investments that traverse sensitive, protected, or developmental areas concerning biodiversity and natural ecosystems. Our efforts are conducted in alignment with national and international legislation and our dedication to maintaining a balance between biodiversity conservation and the sustainable utilization of natural resources. In general Enerjisa Enerji's biodiversity conservation strategy and ambition is as follows.

Strategy and Ambition Statement

Enerjisa Enerji is committed to contributing to the United Nations Sustainable Development Goals (SDGs), including those related to the conservation of biodiversity. We recognize that we have impacts and dependencies on biodiversity across our operations and value chains, which can have financial, business and operational consequences for our company. As our objective is to minimize our impacts, we consider biodiversity a strategic priority both in our day-to-day and business decisions. Being aware of the challenges such as data limitations and the lack of simplified biodiversity metrics, Enerjisa Enerji recognizes the importance of taking early actions and we aim to contribute to the Global Goal of halting and reversing biodiversity loss.

We will realize this aim by developing a robust baseline, detailing the specific impacts and dependencies on biodiversity for each Business Unit of Enerjisa Enerji, then re-evaluating and enriching our Biodiversity Action Plans accordingly. We aim to implement these in collaboration with our shareholders, industry partners, NGO's and all other stakeholders.



Water Management and Consumption

The global decline in available water resources poses a risk to all humanity. Moreover, water resource risks are expected to rise in conjunction with anticipated population and economic growth, and the impact of climate change. Türkiye is not a water-rich country and due to its growing population, developing economy and urban expansion, is on the way to becoming "water-poor."

Enerjisa continuously assesses the current and potential positive and negative impacts of our water usage on the economy, environment, and human rights, tailoring our water management strategies accordingly. Our operations do not discharge industrial pollutants, and domestic wastewater is responsibly released into municipal sewerage systems.

In all Enerjisa subsidiaries, comprehensive strategies have been developed to ensure effective water management. Efforts are focused on reducing water consumption within operational areas and minimizing the impact on local water resources. Initiatives have been launched to curtail water use and harvest rainwater, thereby mitigating water scarcity risks. Water-saving taps and devices are employed to enhance efficiency, with

targets set to reduce consumption, and regular monitoring conducted across facilities. Additionally, there is a strong emphasis on the efficient use of natural resources, enhancing recycling efforts, and systematically reviewing water and climate-related risks and opportunities. Priorities include setting targets for reducing water consumption, monitoring usage levels, implementing measures to protect water resources, and preventing pollution across all operational areas.

Any domestic wastewater generated is not discharged to a natural receiving environment, but directly into the city sewerage system (except groundwater used for garden irrigation purposes).

Enerjisa Enerji Distribution Companies published the Instructions for Chemical Leakage-Spill and Pollution Prevention Plan. Additionally, employees of these companies were informed regarding the required rules and process controls for preventing environmental pollution in municipal water, surface water and groundwater resources while conducting electric distribution activities outside their own buildings.

As the direct use of water in Enerjisa Enerji's operations is limited to domestic purposes, the water-related risks are low in terms of a direct impact on operations. However, water-related risks may affect the payment capacity of customers whose operations require high water consumption; additionally, the hydrological factors may affect energy prices. These risks are followed by the relevant business units and necessary precautions are taken.

Enerjisa Enerji Water Policy is available on the Investor Relations website.

In 2024, a water consumption goal was set as part of 14001 Management. The goal was to reduce the amount of water (taken from the municipality) consumed per m² in buildings by 3.50 % compared to the previous year. Appropriate programs are determined and water-conservation activities are conducted.

IMPACT FOR PLANET

Enerjisa Enerji, being aware of the importance of water, is reducing consumption, conserving water resources, and **working towards sustainable water use with effective water management strategies.**

**265
TONS**
RAIN WATER
COLLECTED

The Administrative Affairs Units in both the distribution and retail business lines are responsible for monitoring and reducing water consumption. In 2024, the Company's total water consumption data will be included in the Enerjisa Enerji 2024 Sustainability Report.

Activities to reduce water consumption are as follows:

Enerjisa has established water consumption targets for 2023 and is intensifying efforts to decrease water use. All Business Units are monitoring and striving to reduce water consumption in alignment with the targets set under ISO

14001 Management. In pursuit of water savings, aerators have been installed at the ends of all taps, effectively reducing water consumption. A rainwater harvesting project has been executed at the Zonguldak and Sincan customer service centres, where approximately 57 tonnes of rainwater have been collected at these sites. The harvested rainwater has been repurposed for cleaning and toilet flushing. The retail business unit has also replaced all washbasin faucets with new sensor-operated, cost-efficient models.

The wastewater generated during the treatment process of water dispensers in the Distribution Business Units is used in cleaning purposes to contribute to the protection of natural resources. In 2024, 208 tonnes of water was used in areas such as irrigation and cleaning due to rainwater collection systems.

In 2023, Enerjisa achieved significant outcomes in its water consumption management, successfully reducing total water consumption from 102.589 in 2022 to 97.251. This reduction represents a decrease of 5.338 units. The Company also surpassed its 2023 target for per capita water consumption reduction,

achieving a 7.78% decrease against the initial target of 1%. Looking ahead to 2024, Enerjisa plans to shift its focus from a per capita basis to a per square meter basis for measuring water consumption, with a new goal of reducing usage by 3.5%, following a recalibration from a per capita basis due to variations in employee numbers and remote working conditions. The Company's commitment to monitoring and optimizing water use effectively is reflected in these significant achievements. When the new method (per square meter) was reviewed, we calculated our water consumption reduction in 2023 as 9.6% compared to 2022.

Water consumption and reduction data for 2024 will be shared in the 2024 Sustainability Report.

Air Quality

Enerjisa Enerji does not engage in electricity generation activities; therefore the Company's direct impact area on air quality is limited. Moreover, the Company monitors emissions and aims to reduce those that affect air quality. In addition, Enerjisa Enerji operates in compliance

with the Regulation on Control of Industrial Air Pollution regarding emissions from its generators, machinery and vehicle fleet.

Excluding extraordinary conditions, the Company's operations do not include any polluting gas emissions, other than burning fossil fuels for heating and

transportation. Enerjisa Enerji conducts various activities to improve the existing monitoring scope in order to follow up and report indirect GHG emissions, i.e., air polluting gases.



IMPACT FOR SOCIETY**Operating in a dynamic industry that is being transformed by global mega trends, we aim to prepare for the future by focusing on our employees and society.****Merve Varlı**
Customer Experience Manager

The motto "A Better Future" represents, for me, the responsibility of not only meeting today's needs but also building a sustainable world for tomorrow. In 2024, Enerjisa Enerji invested in renewable energy projects, focusing on reducing carbon emissions and expanding sustainable energy sources. One of the key initiatives was increasing investments in the Eşarj charging station network to support the transition to electric vehicles, leading the establishment of over 1,500 stations across Türkiye.

As Eşarj, we focus on reducing carbon emissions and promoting the use of clean energy by strengthening the electric vehicle charging infrastructure throughout Türkiye, reinforcing our pioneering role in the industry. As part of the Customer Experience team, we aim to provide reliable, fast, and innovative solutions to make it easier for our users to be part of this transformation.

We empower people to create prosperity and an inclusive society; we encourage a talented and diverse workforce in a safe working environment; and we act responsibly to create a wider positive impact on communities.

Operating in a dynamic industry that is being transformed by global mega trends, we aim to prepare for the future by focusing on our employees and society. Inclusion, diversity, accountability, ethics and transparency are key to establishing a preferred workplace, and contributing to the prosperity and well-being of society and our community.

Health, Safety and Well-Being

We value the health and well-being of our employees and act as a role model in occupational health and safety. We are committed to the Zero Accident Journey and aim to prevent fatalities, as well as critical and high potential near-miss accidents.

Corporate Social Responsibilities and Community Investments

We provide voluntary contributions to the prosperity of society in addition to direct financial support with our community investments. We conduct corporate responsibility projects that have a strong community impact; and we carry out activities directed towards education, energy conservation, and the environment and society within our CSR efforts.

Talent Management

We invest in engaging and retaining talent and aim to support the individual and professional development of our employees; and we are committed to quantifying the impact of our talent management programs.

Diversity, Equity and Inclusion

At Enerjisa Enerji, we strongly believe in the importance of diversity, equality and inclusion in building a strong workforce and creating a fairer society. We are committed to creating a working environment where everyone can benefit equally from all opportunities and we put this principle at the centre of our business processes. We offer equal opportunities to everyone regardless of age, gender, language, religion, nationality, race, ethnic origin, sexual orientation, marital status, health status, disability, political opinion or union membership; in addition to our internal activities, we develop practices aimed at removing obstacles in the lives of disabled individuals for our customers in line with our "Equal Access for All" approach.

At Enerjisa Enerji, we believe that diversity, equality and inclusion are not a choice but a humanitarian imperative, and we continue our efforts with the determination to strengthen these values in every field for a fairer and more accessible world for all.

¹For more information, please see the People and Culture section of this Report.

²For more information about Diversity, Equity and Inclusion activities, please see the People & Culture section of this Report.



IMPACT FOR SOCIETY

We take a wide range of precautions to manage the potential risks that employees and contractors may encounter in their roles.

Occupational Health and Safety

Our employees and contractors are exposed to significant health and safety risks in the course of electricity distribution activities and the installation of alternative energy solutions and e-mobility. We consider occupational health and safety (OHS) as one of our key values and while planning our site activities, we identify the possible risks in advance and consequently take a wide range of precautions to manage the potential risks that employees and contractors may encounter in their roles. Additionally, Key Performance Indicators (KPI) on OHS are periodically presented to the senior management.

We monitor OHS performance through the monthly OHS-E Report, which also includes Critical Accident and Safety Improvement Plan target realizations; these two KPIs are incorporated in the senior management's performance assessment.

The OHS policy sets out the senior management's commitment to occupational health and safety. This policy was announced to the entire organization and our stakeholders, and is available for review. The OHS policy emphasizes the importance of proactively preventing accidents and diseases, complying with legal obligations, and continuous improvement.

Enerjisa Enerji's Health and Safety Policy is available on the Investor Relations website.

The Occupational Health and Safety Management System

We believe that managing OHS in accordance with international standards is vital. The ISO 45001 Occupational Health and Safety Management System covers all the locations and facilities of our distribution and retail sales companies. The management system preparation processes have been completed in our ECS companies and the certification process will begin in 2025. In accordance with the principle of continuous improvement, audits performed within the scope of the Management System demonstrate that our Occupational Health and Safety Management System achieved a transformation focused on preventive actions through a more efficient and integrated approach based on risk and opportunity. The annual interim audits in 2024 showed that activities were conducted in accordance with the OHS Management System and that the commitments specified for continuous improvement were fulfilled.

We conduct risk assessments for potential new projects, non-routine operations and changes in existing operations. Prior to commencing new operations, we ensure compliance with OHS standards. During risk assessment processes, we implement the Fine-Kinney method, with hazards determined according to the probability of occurrence, severity and frequency. We classify the identified risks and undertake precautionary measures to mitigate any risk exceeding an acceptable level.

We draw up emergency plans for each region and conduct annual emergency drills. We identify actions necessary to eliminate any issues of non-compliance found in the annual drills and monitor their implementation.

We establish monthly and annual targets to promote higher OHS awareness. With the aim of improving OHS performance and identifying risk areas more effectively, we ensure the collaboration and participation of our employees and stakeholders. We expect our employees and contractors to participate and provide their feedback during risk assessment and incident investigations.

We also provide employees with the opportunity to be involved in relevant decision-making processes regarding OHS issues via OHS committees that include employee representatives. We take into consideration the views of union representatives, and field workers in the selection of Personal Protective Equipment, and we ensure their participation in the material selection process.

We invest in OHS training to disseminate our OHS culture and we organize workshops and meetings to raise awareness among employees, business partners and contractors across all regions in which we operate. We deploy all existing communication channels to notify contractors regarding work-related accidents and near misses in all units, and utilise the Contractor Communication Portal to maintain contact with contractors in Distribution Companies.



Zero Tolerance Policy Towards Violence

In 2022, we issued the Zero Tolerance Policy Towards Violence. The purpose of the policy is to set principles and enforcement processes establishing a work environment at Enerjisa Enerji that is egalitarian, safe, and does not tolerate violence of any kind. Accordingly, we endeavour to raise awareness regarding violence, and to provide support and assistance mechanisms through which employees who have been subjected to violence can communicate in a secure and confidential manner. Additionally, we operate an enforcement mechanism by means of effective examination and auditing processes.

Enerjisa Enerji's Zero Tolerance Policy Towards Violence Policy is available on the Investor Relations website.

OHS Training

We strive to develop and maintain an internalized OHS culture and a safe workplace for all our employees. We conduct regular training and improvement activities to reduce OHS risks for employees and contractors and to ensure a healthy workplace in terms of OHS management. Training on safe working conditions is an integral element of OHS management and strengthens both our OHS culture and employees' professional skills.

We provided 181,295 hours of OHS training for 11,757 employees in 2024, corresponding to 15.4 hours of OHS training per employee.

*OHS: Occupational Health & Safety



In 2024, Technical Trainings provided to our employees. Additionally, we provided a three-day practical training program on Working Safely at Heights to 147 field workers, and a refresher course on Working Safely at Height Reminder Training to 1,312 employees based on their job descriptions. Safe driving training was provided to 595 employees, and G-class driver's licenses were issued to 130 employees.

As well, in 2024, we implemented a number of projects targeted towards raising employee awareness of occupational health and safety, encouraging ownership in this matter, and actively contributing to the development of the Company's OHS culture.

OHS Week

Further emphasizing the priority that we accord to OHS awareness, we conducted informative messaging from 4 to 10 May, OHS Week, to raise OHS awareness across the entire organization. Additionally, business unit managers shared related video messages during the week.

Training for Contractors

We adhere to the legislation regarding the processes required for programming OHS trainings for the employees of contractor companies, ensuring this process through field audits, document controls and regular meetings. In 2024, contractor companies provided basic OHS training for 7,675 employees.

Field Audits

We established instructions and procedures for performed work to ensure that employees conduct their activities safely. In this context, we provided training in accordance with rules and procedures, and ensured compliance with these practices in the field through field inspections. Improving the OHS culture of our business partners and contractors is one of our core responsibilities. In this context, our relevant business units conduct one-on-one visits to contractors and request safety improvement plans. In 2024, we realized approximately 38,286 field inspections for our employees and approximately 20,260 OHS field inspections contractor company employees.



IMPACT FOR SOCIETY

Focusing on root cause analysis to prevent work accidents and to provide a safe working environment, developing innovative projects benefitting from technology, and continuously improving the Health & Safety culture.

Projects to Improve OHS Performance

We consider the prevention of occupational accidents to be a crucial aspect of maintaining a safe working environment. In pursuit of this goal, we prioritize root cause analysis in incident investigations. Across the Company, we implement innovative initiatives and practices that leverage technology to prevent accidents, particularly in high-risk processes.

In 2024, unfortunately 2 of our employees (1 Enerjisa, 1 Contractor) passed away as a result of work accidents. The accident investigations of these accidents have been comprehensively handled and the necessary steps have been taken to prevent them from happening again.

In the same year, we implemented the following improvement measures targeted towards preventing potential accidents and enhancing the safety culture within the organization. Various webinars have been organized on topics such as earthquake, emergencies, occupational health, environment, zero waste, etc.

Unsafe Acts Project: In the 2019 Model-Based Critical Behaviour Analysis study, we endeavoured to determine the causes of critical unsafe behaviours and examined the resulting outputs. A seminar series, building on the insights gained from this study and aimed at understanding the underlying causes

of unsafe behaviours, was conducted throughout Distribution Companies in 2022. As a furtherance of the project, the identification of unsafe behaviours was initiated in 2023. Within the scope of this project, the project team carried out studies to create an inventory to identify unsafe behaviour items, conflicts and tensions that may occur in the processes, and the attitudes of employees in 2024. This project aims to make improvements that will have a positive impact on the safety culture in distribution companies.

ISO 39001 Road Traffic Safety Management System Establishment:

To introduce a systematic approach to Traffic Safety, the installation of the ISO 39001 Road and Traffic Safety Management System in Distribution Companies commenced in 2022. In 2023, a gap analysis was conducted within the scope of Road Traffic Safety to enhance good practices in our companies' current operations and to identify those practices requiring reinforcement. Based on the findings, a road map has been developed. In this context, the certification process was completed by carrying out internal and external audits during the management system establishment process in 2024. In addition, in order to bring a systematic approach to traffic accident investigations, Traffic Accidents Root Cause Analysis Trainings were provided to our employees who carry out the traffic accident investigation process.

Working Near Low Voltage Project: In our distribution companies, research has been initiated on how to work near low voltage by taking into account national and international practices and standards in working near voltage, and preliminary studies have been initiated to determine the method by receiving consultancy services in this context. In this context, field visits were carried out and workshops were held with our Central System Operation and OHS departments on how to work near voltage, specific to the network types we use.

Employee OHS-E Meeting Guide: An OHS-E employee meeting guide has been prepared to convey occupational accidents, near-miss incidents and their investigation results to field employees at employee meetings, to inform employees about changes in instructions and to make OHS sharing more efficient. Meeting methods and procedures are explained in this guide. Thus, it is aimed to increase the effectiveness and efficiency of OHS-E meetings.

OHS Communication Gap Analysis: Within the scope of employee meetings, efforts are being made to improve the physical conditions of the halls and areas where meetings are held in order to make the meetings more efficient and to make the information conveyed more understandable by the employees.

Weekly Incident Notifications: In 2022, the Weekly Incident Bulletin, accessible to all employees, began to include investigation results for accidents and near misses in Distribution Companies. In addition to incident investigation reports, the Bulletin incorporates Critical Accidents and High Potential (HiPo) Incident Notifications from the previous week. This ensures that employees have access to timely information during ongoing incident investigations. An additional aim is to compile a comprehensive document by the year-end that includes all Critical Accidents and HiPo Incidents.

Instruction-Procedure Simplification: The project's objective is to simplify and thus better facilitate the transfer of instructions and procedures pertaining to critical risk activities in Distribution Companies.

Effective OHS Communication Workshops: Two-day practical workshops were organized to enhance the skills of those engineers and team managers responsible for employee meetings in establishing effective OHS communication. Participants gave presentations, gaining practical experience, and received feedback. During sessions featuring professional actors, participants practiced various methods for conveying OHS information effectively. In 2024, these sessions continued.

Lessons Learned from Accidents Workshops for Contractors: Workshops for Distribution Companies' contractors continued in 2024. Tailored specifically for contractor employees, the "Lessons Learned from Accidents" workshops presented serious accidents that had occurred during contractor operations and the subsequent actions and responses. The goal of these workshops is to disseminate the Occupational Health and Safety (OHS) approach and experience of Distribution Companies to contractor companies.

Occupational Health Webinars: Webinars on health issues were organized for employees and conducted by expert medical officials. In 2023, webinars on health issues were started to be organized for our employees by doctors who are experts in their field. In 2024, these webinars continued. Health webinars titled "World Mental Health Day," "Digital Balance and Psychological Resilience," "We Threw Away Vaccines, So How Can We Prevent Diseases?", "Parents Managing Exam Anxiety" were organized to inform employees about health issues.

Community Health and Safety Campaigns: Information guides were published on our social media accounts in order to make the public aware of the dangers and risks arising from our electricity networks in our fields of activity and to increase the level of awareness by raising public awareness.

Occupational Health and Safety Performance Indicators
We monitor OHS performance in line with critical accident targets. In addition, we ensure the participation of the entire organization in OHS audits and contractor management by monitoring SIP (OHS Improvement Plan) targets at the directorate level.

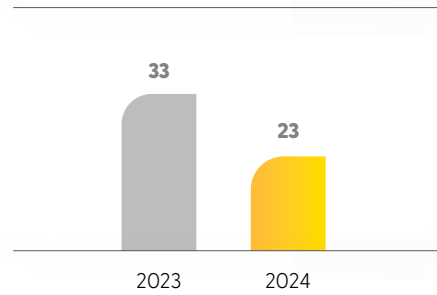
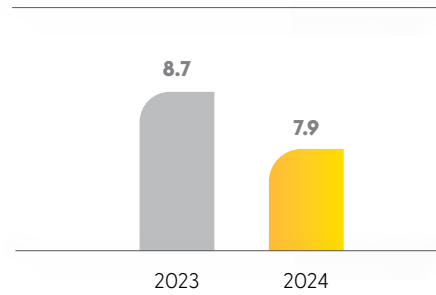
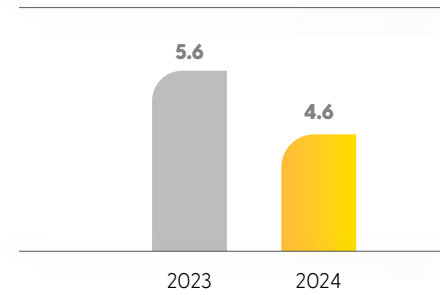


IMPACT FOR SOCIETY

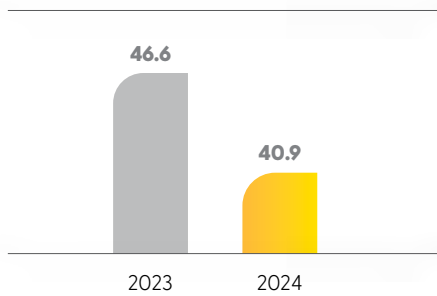
Across the Company, we implement innovative initiatives and practices that leverage technology to prevent accidents, particularly in high-risk processes.

We monitor our OHS performance based on the following metrics. The data includes all employees and contractors.

Number of Critical Accidents

Total Recordable Incident Frequency (TRIF)²Recordable Incident Frequency (Excluding flat slip, trip and fall accidents) (TRIF' W/O STF)¹

Total Working Hours (million)



¹Total Recordable Injury Frequency W/O Slip, Trip and Fall Accidents: (Accidents resulting in fatality, lost workdays, medical treatment; excluding flat slip, trip and fall accidents) x 1,000,000 / Total working hours

²Total Recordable Incident Frequency: (Accidents resulting in fatality, lost workdays, medical treatment) x 1,000,000 / Total working hours

* The numbers are consolidated for the Enerjisa Enerji employees and contractors.



IMPACT FOR SOCIETY

We are striving to increase our positive impact on society by focusing on corporate responsibility projects that have a significant effect.

Corporate Social Responsibility and Community Investment

At Enerjisa Enerji, in addition to offering direct financial support to enhance societal well-being via our social investments, we cultivate collaborations with reputable institutions and organizations that are authorities in their respective fields. We actively encourage our employees to engage in voluntary work, and we are striving to increase our positive impact on society by focusing on corporate responsibility projects that have a significant effect.

In 2024, we continued corporate social responsibility and community investment activities focusing on education, energy conservation, and the environment and society.

I Protect My Energy

Energy conservation is one of the most important topics in the energy sector in Türkiye. As Enerjisa Enerji, we aim to increase societal awareness on energy efficiency, especially among primary school students, to create a positive impact on society. Through the protocol signed with the Ministry of National Education of the Republic of Türkiye, we have been implementing the "I Protect My Energy" project since 2010, aiming to raise awareness about energy efficiency in children. Since the project's inception, over 360,000 students in 750 schools across 15 provinces have received training on energy conservation, with more than 450 of our employees volunteering in the project to date.

In 2024, the 14th year of the project, we continued with children's theatre performances. Through our organized events and the play *Küsmesin Yıldızlar*, we reached 10,000 children in 2024 alone, helping them become informed about energy conservation.

"I Protect My Energy," one of Türkiye's longest-running Corporate Social Responsibility Projects, has been expanding its impact through the "Energy Guardians Program," launched last year in collaboration with the social enterprise Science Virus. In 2024, the program continued its mission. The program connects university volunteers with students aged 7-11 to raise awareness about the efficient use of energy, build sustainability consciousness, and foster global awareness. Young people who wish to contribute to the common good, by recognizing their own impact on the world and the world's impact on them, come together through this program.

Young participants in the Energy Guardians Program undergo training to specialize in topics such as Energy & Sustainability, Storytelling, and Learning Through Play. After the trainer training, these young Energy Guardians voluntarily deliver educational modules on "Energy Conservation," "Sustainability," and "Global Awareness" to children aged 7-11 in their local communities, taking action to protect energy as part of the Energy Guardians Community. The SROI study, which helps to measure the true value of an investment by combining financial and social impacts, determined

that every 1 TL spent on the "Protect My Energy" project creates a social value of 3.17 TL.

Centre for Tourism Practices Based on Sustainable Energy (SENTRUM)

With our Centre for Tourism Practices Based on Sustainable Energy project, SENTRUM, we aim to transform an underdeveloped destination, promote sustainable tourism, and support local economic development. We strive to create a positive impact on society, the environment, and the economy through sustainable tourism while contributing to the well-being of the local community.

We launched our SENTRUM project in Küçükköy, Ayvalık in 2021 in order to contribute to sustainable tourism. And today, we are setting out for the sustainable transformation journey of Birgi, Izmir in collaboration with Turkish Ministry of Culture and Tourism, Türkiye Tourism Promotion and Development Agency (TGA), Enerjisa Enerji and United Nations Development Programme (UNDP). In this journey, we will be sustaining our efforts to create sustainable green destinations by getting stronger with the support of Sabancı University, HiltonSA Hotels, Sabancı Foundation, and local stakeholders.

The main objective of the project is to align globally recognized destination standards with the unique needs of destinations in order to make significant contributions to community-based socio-economic development in small-scale destinations in Türkiye.



The specific objectives of the project are as follows:

- Supporting social, environmental, and economic transformation in the field of sustainable tourism,
- Raising awareness about energy efficiency and the use of renewable energy sources, contributing to community-based socio-economic development,
- Creating a scalable and replicable sustainable green destination.

1) Ayvalık, Küçükköy

Solar power plants and energy efficiency applications were implemented in two public buildings in Küçükköy, Ayvalık. A private enterprise was also supported in terms of improvements in energy practices. Trainings was provided to 140 people, including high school students, local women, and business owners, on topics such as energy efficiency, sustainable tourism, waste management, climate change, and gender equality. Throughout all the activities, gender equality was prioritized, aiming to increase women's participation in the processes, enhance their knowledge, and empower them.

A Gender Equality Action Plan was developed to guide the work. Through these efforts, contributions were made to several Sustainable Development Goals (SDGs) targeted for 2030, particularly SDG 7 (Affordable and Clean Energy), SDG 8 (Decent Work and Economic Growth), and SDG 12 (Responsible Consumption and Production). Küçükköy Necmi Komili Primary and Secondary School became one of the first in Türkiye to achieve 'Net Zero Energy Building' status. After taking steps towards sustainable tourism in Küçükköy, a total investment of 550,000 USD was made over an 18-month implementation period to raise awareness and invest in renewable energy sources. This resulted in significant energy savings by preventing the annual use of 15,000 kg of coal and avoiding 90,000 kg/year of carbon emissions.

2) İzmir, Birgi

In Birgi, we aim to align globally accepted standards with the unique needs of destinations and support sustainable tourism in small-scale destinations in Türkiye, contributing to community-based socio-economic development.

Among the activities to be carried out in Birgi are leading a destination transformation compatible with GSTC criteria, conducting current situation analyses to identify needs in areas such as gender equality, climate risk assessment, employability of women and youth, and the provision of internship opportunities for tourism vocational high school and university students. Other activities include creating sustainable tourism routes and improving existing ones, ensuring energy efficiency transformations in selected public buildings, conducting energy audits for local tourism businesses and public buildings, and determining the steps to reduce energy consumption. Additionally, we will organize capacity-building training programs for local stakeholders and tourism businesses to reduce excessive water and energy consumption and minimize the use of single-use products.

IMPACT FOR SOCIETY

While preserving cultural heritage and supporting sustainable tourism in Birgi, we focus on strengthening the marine ecosystem and fishing communities in Karataş.



The Transformation Activities Carried Out in Birgi

- A situational analysis was conducted to identify tourism resource values and marketable cultural and natural assets in Birgi.
- Energy audits were conducted for local tourism businesses and public buildings.
- Focus group discussions were organized with local tourism businesses and women from Birgi, with a total of 91 participants.
- Trainings on various topics such as 'Creative Drama Workshops', 'Energy Efficiency', 'Next Generation Customer-Centric Sales', 'Content and Content Creation' and 'Behavioural Finance' were provided to local tourism businesses, women from Birgi, and high school students. A total of 291 people participated and received certificates.
- Video shoots were conducted for the recipes of local delicacies for the 'Birgi Sustainable Flavors' booklet, narrated by Şerife Aksoy and local Birgi women. Content work for the booklet was also initiated.
- Workshops on vinegar (mustard, bread) and pickle-making were organized for local women and tourism businesses in collaboration with Şerife Aksoy. A total of 60 participants received certificates, and videos of the workshops were recorded for those who couldn't attend.
- A building allocated by Ödemiş Municipality in Birgi was redesigned under the SENTRUM project and

equipped with furniture and equipment for the use of local women and children.

- Sustainable tourism routes were created for Birgi, with five signposts installed, and a digital, multilingual, and updated signage design process was initiated for worn-out signs.
- A 'Marketing and Branding Strategy' was created for Birgi.
- A 'Gender Equality Action Plan' was prepared, and activities were updated in line with this plan.
- Training on the 'GSTC Certification Process' and 'Sustainable Tourism' was provided to 11 pension operators in Birgi.

Support to Sustainable Fishing Project

The Karataş Sustainable Fisheries Support Project, implemented in cooperation with Enerjisa Enerji, Karataş Municipality and Karataş Fisheries Cooperative, is a comprehensive initiative that aims to create a sustainable economic model and increase the welfare of the people of the region by protecting the rich marine ecosystem of the Mediterranean. While Karataş is notable for having one of the largest fishing fleets in Türkiye, it is also one of the regions where plastic pollution and environmental threats are intense. Fishing, the district's biggest source of livelihood, faces problems such as ghost nets, plastic waste, global warming and invasive species. This situation threatens both the marine ecosystem and the livelihoods of the people of the region.

This project is designed to reduce marine pollution, promote the use of renewable energy, strengthen gender equality and increase the sustainability of the fishing sector. Directly serving nine of the United Nations Sustainable Development Goals, the project aims to simultaneously achieve several environmental, economic and social goals.

Main activities within the scope of the Project:

Collection and Recycling of Ghost Nets and Plastic Waste

In the waste collection centre established within the cooperative, ghost nets and plastic waste taken from the sea are collected and recycled. This activity aims to both prevent marine pollution and create additional sources of income for the cooperative. While the products produced from waste create an economic model, employment and economic independence of women in particular are supported.

Solar Power Plant Installation

A large portion of the energy needs are met by renewable sources with the solar power plant installed on the roof of the cooperative's icehouse. A great contribution to the environment has been made by preventing approximately 23 tons of carbon emissions annually, and the savings in energy costs have been returned to the fishing ecosystem.

Trainings Provided to Fishermen and Local People

With the trainings organized for fishermen and local people, awareness was increased on issues such as marine biodiversity, sustainable fishing, energy efficiency and plastic waste management. At the same time, issues such as gender equality, health and quality of life were addressed and the social and economic empowerment of the local people was ensured.

Workshops to Strengthen Women's Employment

To support women's economic independence, advanced recycling workshops have been established and trainings have been conducted. A revenue model has been created for women with products such as bags, accessories, and similar items made from

waste nets, increasing their visibility in the local economy. It was identified that women were working in ergonomically unsuitable conditions, and in collaboration with İzmir University of Economics, ergonomic net knitting looms were designed and promoted in the region.

Project Impacts and Sustainability Model

Over 20 tons of ghost nets and plastic waste collected in one year within the scope of the project have made a significant contribution to the prevention of marine pollution. While the use of environmentally friendly energy has been increased thanks to the solar power plant, the activities of the cooperative have been strengthened with annual energy savings. The awareness level of fishermen and the local people has been increased with training, and a sustainable fishing model has been created. Prioritizing the increase in women's economic independence, this project serves gender equality by offering long-term income models for women. The role of women in the regional economy has been strengthened thanks to the cataloging and marketing of products produced from waste.

Long-Term Goals and Inspiration

Karataş Sustainable Fishing Support Project is not only limited to regional development and environmental protection goals, but also makes a significant contribution to the Mediterranean ecosystem and Türkiye sustainability goals. The project's self-sustainability provides a model that will serve as an example for other regions facing similar environmental and social problems. The project, which has won many prestigious awards in one year, has managed to become one of Türkiye's pioneering projects in the field of sustainability by combining the goals of marine protection, economic development and social equality in the same pot.



IMPACT FOR SOCIETY

As Enerjisa Enerji, we know that quality education is essential for a Better Future and we believe that the transformation in education starts with teachers.

Hatay Container City

Throughout 2024, various educational, social and solidarity activities were organized in Hatay Container City. The study centre opened in the summer period offered students from 1st to 5th grades the opportunity to reinforce their lessons and prepare for the new academic year. With the closing of the schools, "Report Card Festival" activities were organized simultaneously in İskenderun and Hatay container cities. Preference counselling and career information seminars were held for students taking the university entrance exam, accompanied by a guidance counsellor. Before the new academic year, 90 children had a colourful and fun day with the "Hello to School" event.

Various programs were carried out for the empowerment and integration of women into society. In the activities organized in cooperation with the Foundation for Supporting Women's Work (KEDV), hands-on workshops such as soap making were held. In addition, digital literacy trainings addressed topics such as digital skills, e-government use, social media management, digital parenting, and raised the awareness of participants.

Within the scope of social solidarity and cooperation, a webinar on "Relationship Conflict Management and Supportive Parenting" was organized with Sabancı University, while topics such as microcredit, grant projects, cooperatives and training programs were discussed

in meetings with KEDV. Needs and demand analysis studies were planned to better understand the demands of container city residents and to find solutions. Preparations are underway for the implementation of regular trainings, workshops and courses in the coming periods. These activities aim to empower container city residents in the areas of education, social support, professional development and solidarity.

'Teachers Are Worth It' Project

As Enerjisa Enerji, we know that quality education is essential for a Better Future and we believe that the transformation in education starts with teachers. With this belief, we launched the "Teachers are Worth It" project in September with the opening of schools with the Teachers' Network, which is run by the Education Reform Initiative operating under Sabancı University, with the aim of making both our teachers and educational environments more productive by supporting teachers' well-being. Throughout the project, we aim to increase the productivity of teachers through meetings, practices and workshops that support their individual well-being, and to develop and spread innovative educational approaches across Türkiye.

We Inspired the Communicators of the Future

As Enerjisa Enerji, within the framework of our mission to create social benefit, we brought communication faculty students from universities in Adana, Gaziantep and Zonguldak, where we operate,

together with Brand Week 2024, one of the most prestigious events in the world of communication. This initiative offered young communicators the opportunity to closely observe the best practices of the sector, to be inspired by leading names in the field and to expand their professional networks. Our students also took an important step for their careers by participating in the Corporate Communication Association's certificate program. The Brand Week event not only contributed to the career development of young talents, but also once again emphasized our commitment to investing in education and young people. As Enerjisa Enerji, we will continue to touch every segment of society with value-oriented projects and support the communication experts of the future.

Leading 100s in Technology Project

We contributed to the technical training of university students in the Leading 100s in Technology Project, which was launched on the initiative of the Women in Technology Association and aims to support young people in science and technology. With the mentoring meetings we organized under the guidance of our volunteer managers, we accompanied the development journeys of young talents. In the new period, we will continue to stand by and support our young people with the continuation of the project.

Enerjisa Vocational High School Meetings

We came together with Enerjisa Istanbul Vocational and Technical Anatolian High School students and held inspiring meetings about the business world. While providing insights to the professionals of the future about what awaits them, we had the opportunity to share our knowledge and experience. We will continue to support and inspire the talents of the future by continuing our meetings with students with a broad perspective ranging from technical fields to the business world.

Başkent Edaş Sports Club

At Enerjisa, we place corporate social responsibility and well-being goals at the core of our operations, and support educational and sports lives of our athletes via our club-family-school collaboration. Competed in several leagues in various age categories (between ages of 12-18) with 135 athletes managed by two coaches, Başkent EDAŞ Sports Club, which has been offering young talents the opportunity for personal development and to reveal their potential since 2019, became champions in the U14, U15 and U16 leagues and achieved the third place in the U17 and U18 leagues in 2024. Supporting the physical and mental development of young talents, we prepare these talents for the future, for them to become healthy and good individuals in a team spirit, and provide them with the opportunity to realize their potential.

Employee Volunteer Programs

We support our employees' voluntary participation in social responsibility projects and efforts to contribute to social welfare in every way. We believe that the activities in which our employees participate voluntarily not only increase their own morale and loyalty, but also strengthen their sense of belonging to the Company.

As part of the Sabancı Youth Mobilization, which we aim to transform the brain drain into brain power initiated by Sabancı Holding, we have launched the sixth Sabancı Technology and Impact Centre with volunteers from Enerjisa at the Söğütözü Customer Services Centre. Within the scope of the project, the innovation and entrepreneurship potentials of university students from different cities are revealed in the trainings given by volunteers at the Customer Services Centre.

In the project, where a total of 750 students from 88 different universities were brought together and a large-scale learning and development journey was undertaken, 7 different sessions were organized in 2024 and striking information was presented to participants from different universities on various topics such as the foundations

of entrepreneurship, trends in the energy sector and digital transformation solutions. The project, which will continue to expand in 2025, aims to increase young people's awareness of career opportunities in this field by focusing on digital transformation and innovative applications in the energy sector.

Since 2023, we have been using the Abilitypool digital platform to manage our volunteering projects and report all volunteering activities and employee volunteering hours on a single platform. We open our own "Energetic Hearts" projects to our employees, and our employees can also apply individually to various civil society projects run by different associations through the platform. With this application, our employees can individually participate in projects of various Civil Society Organizations in Türkiye in line with their talents and interests and increase their volunteering hours.

We carry out many volunteer projects on this platform, such as the workshop of beds, cushions and toys made of waste netting for stray animals, and the FIRST LEGO League, where our volunteers and the Science Heroes Association serve as jury members.



BUSINESS FOR IMPACT

Our goal is to connect and create a New Energy World, setting an example for millions of people while delivering a vital public service.

We aspire to contribute to the growth of our business by offering sustainable products and services through a responsible value chain approach and innovation.

As one of Türkiye's leading companies in electricity distribution, retail sales and customer solutions, we play a pivotal role as a catalyst for social development and prosperity. We recognize our obligation to provide essential services in this field: Our goal is to connect and create a New Energy World, setting an example for millions of people while delivering a vital public service. In that regard, we have placed sustainability at the core of our business.

At Enerjisa, our focus is ensuring continuity in energy supply, preparing infrastructure for electrification, and expanding renewable energy capacity to align with national and international climate goals. We reduce carbon emissions, promote sustainable energy consumption, and recognize energy access as a fundamental right. Our commitment to R&D and cutting-

edge technologies, such as AI and IoT, supports this mission. We enhance operational excellence and customer satisfaction through initiatives like the E-TERNAL digital model. At the same time, our investments in smart grids, EV infrastructure, and renewables position us at the forefront of Türkiye's green transformation.

We acknowledge that a sustainable society relies on a robust and adaptable energy ecosystem. Therefore, we focus on providing sustainable products and services, while aiming to meet our customers' demands and expectations with tailored solutions.

Innovation is an indispensable element of our sustainability strategy, and we continue to invest in initiatives that accelerate the transition to a resource-based, flexible and low-carbon economy.

Sustainable Products and Services

We are committed to developing sustainable products and services that move towards a resilient and growing energy ecosystem. Accordingly, we

established Enerjisa Müşteri Çözümleri A.Ş. in 2017 to engage in customer solutions activities; since October 2020, we have offered end-to-end solutions to enhance energy efficiency and reduce the carbon emissions of corporate customers under the roof of "The Energy of My Business (İşimin Enerjisi)." Additionally, in our distribution business, we designate distribution investments that support the transition to a low-carbon energy system.

Customer Centricity

The importance of "customer centricity" is growing in tandem with evolving customer needs and behaviours. A customer-oriented approach requires an intense focus on the needs and demands of our customers. Placing customer satisfaction at the heart of our business model, we offer the best services, create new applications and consistently make new investments.

Responsible Supply Chain

We continue grid investments across three distribution regions in order to provide uninterrupted and high-quality electricity service to our customers. In carrying out various infrastructure projects as part of these investments, we require flexible supply chain management.

Research & Development, Innovation And Digital Transformation

By advancing smart grid technologies and infrastructure, we are playing a crucial role in supporting the transition to cleaner transportation and enabling efficient power distribution for electric vehicles. We invest in innovation to lead the New Energy World and explore new opportunities through a systematic innovation approach. Our innovation activities foster a culture of innovation within the Company in addition to focusing on the entrepreneurship ecosystem outside the Company and establishing strong collaborations.

Data Security

The amount of data that we process, transmit and store grows exponentially alongside digitalization processes. As part of our responsibility to provide a public service, we take every precaution necessary to ensure the highest level of confidentiality and security regarding customer information within the framework of the applicable legislation. To achieve this, we implement measures and actions set by our corporate policies and procedures.

Supply Chain Management

To ensure the provision of uninterrupted and high-quality electricity service to our customers, we are actively engaged in network maintenance and investments in three distribution regions, as well as renewable energy power plant installations and energy efficiency projects in line with Türkiye's medium-term plans. These efforts contribute to the ongoing transformation process in Türkiye; thus the significance of

sustainable and responsible supply chain management cannot be overstated in successfully realizing these investments and projects.

We work with more than three thousand suppliers, procuring various services including infrastructure installation, distribution grid construction, repair and maintenance, renewable energy power plant installation and energy efficiency projects, and building construction and renovation, along with the procurement of other goods and services to ensure the sustainable development of our products. Around 400 of these suppliers across all our business units are critical Tier-1 suppliers¹. The entire supplier network of the electricity distribution business line is composed of local suppliers.

¹The main product groups are defined in the Supplier/Contractor Performance Evaluation Procedure. Suppliers belonging to main product groups are defined as critical suppliers and niche suppliers.



BUSINESS FOR IMPACT

We invest in innovation to lead the New Energy World.



Our comprehensive logistics operations encompass 117 Operation Centre Warehouses and 17 Logistics Service Centres, covering a total area of 299,642 square metres. The management of our logistics operations involves a fleet of 145 vehicles, including mobile cranes, forklifts, panel vans and pickup trucks. Material management for both investment activities and maintenance/repair works is efficiently handled through our Logistics Service Centres.

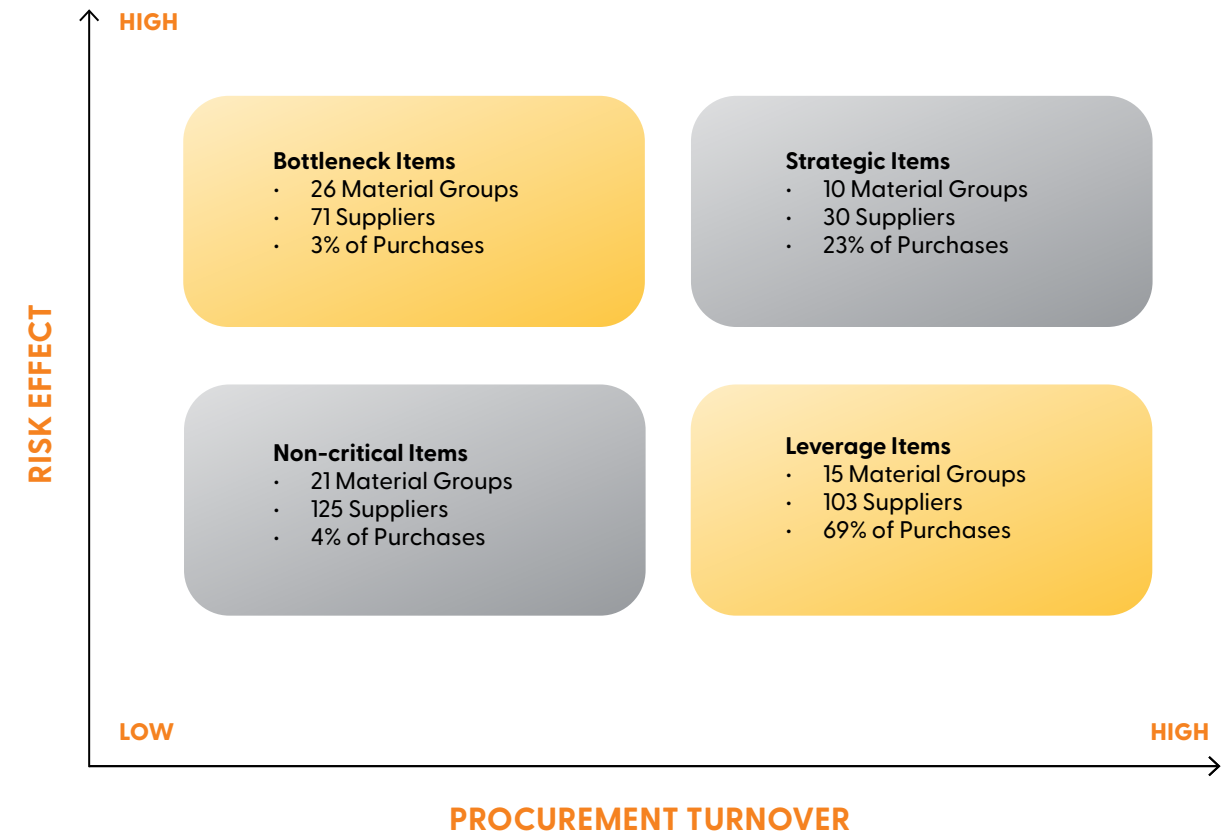
We categorize planned material purchases and suppliers based on market complexity, supply risk, potential bottlenecks in internal and external markets, and suppliers' impact on our profitability using the Kraljic Matrix. This matrix allows us to define the most appropriate purchasing, planning and inventory strategies for each materials purchasing category or supplier.

While applying the Kraljic Matrix to planned materials purchases, we not only identified risks in the domestic and global markets for the 2024 period, but

also formulated strategies to mitigate these risks. Supply continuity risks, including those related to disasters, energy, political processes, and the effects of climate change identified at the beginning of 2024, were incorporated into the supply plans using the Kraljic Matrix. Strategies were developed to ensure supply security against these risks.

In alignment with the Company's 2024 targets, the supply of electricity network materials required for investment, maintenance, and repair processes has been ensured without interruption. These materials were used for expansion, development, continuity and emergency needs during disasters. The procurement and supply continuity strategies were regularly updated throughout the year in response to changing investment and operation plans. The frequency and severity of disasters are increasing due to global changes in climate and natural conditions. In Distribution Companies' electricity network material stocks are maintained at a predetermined level for potential disaster situations.

KRALJIC MATRIX



Kraljic Matrix: The Kraljic Matrix, also known as the Kraljic model, is applied in the planned material management of our supply chain. The matrix is utilised to assess the complexity and risk of the supply market, as well as the significance of suppliers in terms of their impact on the company's profitability. This tool enables the Company to define the most appropriate purchasing, planning and inventory strategies for each materials purchasing category or supplier.

BUSINESS FOR IMPACT

As the sustainability of our supply chain is critical, we support our suppliers and business partners in various ways.

Our Sustainability Approach in the Supply Chain

In our supply chain management processes, we follow the principles outlined in the “Enerjisa Enerji Code of Conduct” and “People Guidelines.” We act carefully and diligently in the selection of suppliers, distributors, authorized dealers, service providers and consultants. We take all required measures and follow up on the outcomes to ensure that our business partners comply with the applicable legislation, the Code of Conduct, and principles governing business ethics and anti-corruption, as well as OHS rules and respect for human rights.

We secure confidentiality commitments in all of the Company’s business relations using contractual means in line with our Code of Conduct. During the selection stage, we also ensure that the natural persons and legal entities with whom we work are not included in national and international sanction lists, and are not connected with any terrorist organization, terrorist actions, or tax fraud or money laundering activities, as well as compliance violations such as child labor and forced labor.

In 2024, on-site visits were conducted with suppliers to discuss their efforts in sustainability and carbon emissions. While the reports and studies in this

regard are still in the early stages within the sector, these visits have contributed to raising awareness among suppliers on the critical importance of sustainability and carbon emissions, topics that will be pivotal in the future. We evaluate our suppliers in terms of sustainability. We also subject them to selection processes with our sustainability question sets in certain categories when selecting suppliers.

Enerjisa Customer Solutions has developed a supply chain management system in line with environmental, social and governance (ESG) criteria in light of the OECD, ILO and UN Guiding Principles on Business and Human Rights. The system includes risk mapping, preventive measures, complaint and notification mechanism, audit and reporting, and corrective action processes. Thanks to this system, while minimizing the environmental impacts of our suppliers, working conditions in line with human rights and business ethics are encouraged. ECS aims to ensure that suppliers comply with our sustainability goals and become partners in development processes with its collaborative approach.

We expect our suppliers to meet the fundamental standards required for successful Environmental, Social and Governance performance, including

respect for human rights. Thus, we require our suppliers to sign the “Enerjisa Enerji Supplier Business Rules” and the “Enerjisa Enerji Supplier Compliance Declaration,” to be adopted Enerjisa’s code of conduct in their own supply chain and to comply with “Human Rights Policy” and “OHS and Environmental Policies.”

We pay our consultants only for duly executed and legitimate services. We require our business partners and companies from/to which we purchase/sell goods and services to comply with the “Anti-Bribery and Anti-Corruption Policy,” as well as our current policies regarding business partner selection, procurement procedures and instructions, and other relevant legal regulations.

Furthermore, we implement a “Third-Party Relations Policy,” which specifies the fundamental principles that apply to the parties with whom we work and their working conditions in all our business dealings. We terminate contracts with individuals and organizations that do not comply with these policies.

Initiatives to Support the Ecosystem

As the sustainability of our supply chain is critical, we support our suppliers and business partners in various ways. Some of the support mechanisms are as follows:

Training: We provide training to suppliers that are of critical importance to our activities in areas ranging from changes in legislation to technical issues related to procurement. Furthermore, we hold Q&A sessions with suppliers prior to calls for tenders, in order to minimize uncertainties that they may experience due to any changes in the regulation (EMRA Procurement Regulation) or the Company’s policies during the procurement process.

With its new Supply Chain Management System, ECS introduces its new criteria, which it takes as a reference in the field of sustainability, to its suppliers and organizes awareness activities. In accordance with the new system, it is planned to assign training to its suppliers in the supply chain within the scope of corrective and improvement activities.

Sustainability of the Supply Chain: For all planned materials, supply continuity risks identified at the beginning of 2024, including those related to disasters, political processes, risks in the field of energy, and the effects of climate change, were incorporated into the supply plans using the Kraljic Matrix. Strategies were then developed to ensure supply security against these risks. We aim to leverage the dynamic

nature of the market by comprehensively assessing the entire supply chain; in this context, we shortened contract terms and introduced price differentials to promptly reflect commodity price changes in contracts with certain suppliers facing bottlenecks in commodity supply.

We continue to leverage framework contracts, enabling us to cultivate longer-term relationships with a broader spectrum of suppliers. We also utilise framework sub-contracts to promptly obtain prices aligned with market conditions. In addition, suppliers are

expected to sign Third-Party Code of Conduct and Declaration of Compliance documents. Through this declaration, suppliers are expected to comply with all relevant legal regulations, the stipulations outlined in contracts, specifications and similar documents governing the business relationship with Enerjisa Enerji, as well as internationally applicable regulations.

Of our 2024 purchases, 99.71% are contracted purchases. In all these purchases, the Third-Party Code of Conduct and Declaration of have been signed.



BUSINESS FOR IMPACT

Third-Party Code of Conduct and Statement of Compliance

Basic Principles

This document has been prepared to inform and guide our Business Partners regarding our expectation that they adhere to the highest ethical standards while conducting business.

In all agreements we sign, we provide information to our Business Partners in the Declaration of Compliance form, indicating where to report situations that constitute a violation or suspected violation, based on reasonable suspicion within the scope of this Code of Conduct and Declaration of Compliance. This includes situations that may create a conflict of interest with Enerjisa Enerji.

Anti-Bribery and Anti-Corruption

We are against all types of corruption. We do not take or give bribes under any circumstances to influence any official transaction or decision, or to assist the Company in taking or maintaining business; we do not act in any way that could cause corruption. In this regard, we act in accordance with all applicable law and the "Enerjisa Enerji Anti-Bribery and Anti-Corruption Policy." We know that violation of Enerjisa Enerji Anti-Bribery and Anticorruption Policy is illegal, as are taking and giving bribes, and that such actions will lead to extremely serious sanctions, including imprisonment, and we act accordingly. We expect our suppliers to act in accordance with these rules.

Our Business Partners avoid any conduct that may lead to corruption. Our Business Partners undertake and guarantee that their employees, subcontractors or agents will not take advantage of, bribe, make illegal donations or other illegal payments to, or accept benefits from, public officials or other third parties. These rules also apply to facilitating actions and payments [payments made to secure or expedite a routine

transaction or process (obtaining permits and licenses, obtaining documents, etc.)) with government agencies.

All transactions must be recorded in legal books and records in an accurate, transparent and adequately disclosed manner.

Environment, Health and Safety

Ensuring a secure, healthy and safe environment for our employees and stakeholders, and protecting the environment are key priorities. We act in accordance with Health and Safety legislation, the Enerjisa Enerji Health and Safety Policy, the ISO 14001 Environmental Management System Standard and the relevant legal regulations on the environment.

We expect our Business Partners to prioritize the protection of health, safety and the environment in the workplace, and to establish and maintain a work environment in line with this basic principle.

Our Business Partners ensure that their employees receive complete training on occupational safety. They provide their employees with the necessary work-related personal protective equipment and ensure that their employees regularly undergo occupational health inspections.

We expect our Business Partners to take measures to protect the environment, establish and maintain an appropriate environmental management system, and encourage the development and dissemination of environmentally friendly technologies to reduce environmental impacts and hazards and further protect the environment in their daily operations.

Labor and Human Rights

We are against forced labour, gender discrimination, child labour, exploitation of children and all other abusive or exploitative behaviour related to workers.

We expect our Business Partners to act in accordance with Enerjisa Enerji Human Rights Policy, to protect human rights, to stand against forced labour, to prevent discrimination and harassment, to comply with legal working hours for employees, to provide a working environment that complies with legal regulations and global standards, to not employ child labour, to respect the rights of employees to organize or elect their own representatives without fear of reprisal, to be able to make requests, complaints and suggestions without fear

of reprisals, to ensure that employees receive their wages in full and on time in accordance with the legislation, and to treat their employees and partners with dignity and respect.

Our Business Partners must conduct their activities by avoiding child labour, forced labour and work abuse. In addition, in accordance with ILO Conventions and Recommendations, the Universal Declaration of Human Rights and the UN Global Compact, we expect our Business Partners and those with whom our Business Partners have business relationships to zero tolerate slavery and human trafficking.

We expect our Business Partners to provide a work environment free from violence, harassment, and other unsafe and offensive conditions resulting from internal and external threats.

We expect and support our business partners to monitor their own supply chains in line with Enerjisa's code of conduct and to improve their processes. We expect our business partners to report any non-conformances they detect in their supply chains and any notifications they receive to Enerjisa as soon as possible.

Our expectations regarding Human Rights in the supply chain are included in our Supplier Agreements, and our suppliers undertake to provide a supply process in line with our expectations.

Compliance with International Sanctions and Trade Controls

To the extent applicable to our business, we comply with, and expect our Business Partners to comply with, all rules and restrictions, including import and export control rules, economic sanctions regulations, and embargoes imposed by various governments, international organizations and financial institutions around the world.

Business Partners Compliance Code of Conduct

We select our Business Partners based on technical competencies, product and service quality, pricing, corporate reputation and financial soundness. We act in accordance with Enerjisa Enerji's Third-Party Relations Policy, which defines the basic principles and principles regarding our working conditions with the parties we will work with within the scope of all business processes; we expect our Business Partners to act in accordance with the aforementioned Policy and to take great care to prevent damage to Enerjisa Enerji's corporate reputation.

We expect our Business Partners to pay attention to the minimum rules of courtesy and respect in communication with customers and third parties on behalf of Enerjisa Enerji, and to use the communication language appropriate to the Company's corporate identity.



STAKEHOLDER ENGAGEMENT

We value our relations with all stakeholders who are directly or indirectly affected by our activities.

We value our relations with all stakeholders who are directly or indirectly affected by our activities. As we work with an extensive value chain, we communicate with the stakeholders in this ecosystem on the basis of trust and in an open and transparent manner. Within this framework, we identify all stakeholders within our impact area and the impacts of our activities on these stakeholders.

The ultimate responsible of stakeholder engagement is Head of Sustainability and Corporate Capabilities (CSO). We adopted the AA1000 Accountability Stakeholder Engagement Standard to identify our stakeholders.

We employ various communication tools to collect opinions and feedback and to effectively address expectations from our employees and internal and external stakeholders, including customers, shareholders, non-governmental organizations, international organizations, analysts, financial institutions, subsidiaries, universities,

media, business partners, suppliers, government agencies, regulatory bodies, and local governments. We utilize several communication tools to receive feedback from our stakeholders and to effectively address their expectations. We communicate with our internal and external stakeholders on a regular basis via the mechanisms specified in Annex III.

Employees and Labour Organizations: For the purpose of fostering a positive corporate environment, communication and culture across the entire organization, we provide a safe working environment to our employees and support their development. Within this framework, we focus on issues such as developing our employees' leadership skills, supporting employees' development through various training programs, and ensuring equal opportunities to all employees. We conduct annual employee engagement surveys to assess employee engagement and satisfaction, and to ensure that the best possible and fair working conditions

are provided. Additionally, we respect labour unions and our employees' collective bargaining rights, as stated in the Human Rights.

Customers: We believe that access to energy is an undisputable human right. We strive to deliver the best possible service in power supply by constantly improving our products and services. We provide electricity to a population of around 22 million with a customer-centric approach. We offer our customers tailored product and services in compliance with the ISO 10002 Customer Satisfaction Management System Standard.

Contractors and Suppliers: We purchase goods and services from more than three thousand different suppliers, of which around 128 are categorized as first-tier critical suppliers. The entire supplier network in our distribution business line is composed of local suppliers. Attaching importance to the quality and sustainability of the supply chain, we support the development of our suppliers and business partners.

ENERJISA ENERJİ STAKEHOLDERS

STAKEHOLDER ENGAGEMENT

We actively participate in non-governmental organizations and initiatives to promote actions that move our industry forward and broaden the private sector's sustainability vision at the highest levels.

Public Institutions and Regulatory Authorities:

Public institutions and regulatory bodies are critical stakeholders that may directly affect us. We are aware of the necessity of a regulatory framework which promotes investments, efficiency and quality for a reliable and cost-effective grid infrastructure in Türkiye. We regularly interact with public institutions and regulatory bodies, and conduct our relations with public institutions on the basis of integrity, honesty, equality and independence; independent of any political view and in a manner consistent with our corporate identity.

Local Governments and Mukhtars:

Within the scope of our annual Local Governments Communication Plan, we regularly visit the offices of governors, district governors, mayors and local community leaders, i.e., mukhtars (elected village or neighbourhood leaders) in our regions. We learn about the expectations of local governments through face-to-face interviews. The requests and feedback we receive provide us with the opportunity to improve our work processes. Communication continues continuously via the WhatsApp line special for mukhtars.

Non-Governmental Organizations (NGOs):

As the sector leader, we are actively involved with NGOs and initiatives that advance the sector and extend our sustainability vision. We actively participate in non-governmental organizations and initiatives to promote actions that move our industry forward and broaden the private sector's sustainability vision at the highest levels. Our Board of Directors Chairperson is also the Vice President of the World Energy Council. In addition, he serves as a Board member for the Sabancı University İstanbul International Centre for Energy and Climate (IICEC), which conducts energy policy research and brings together prominent global authorities on energy and climate at Sabancı University. Additionally, he is the Vice President of the Association of Distribution System Operators (ELDER) and a member of the Advisory Council of the SHURA Energy Transition Centre.

In its commitment to enhancing environmental performance, Enerjisa Enerji continued various collaborations with non-governmental organizations in 2024. The Company actively participated in the TÜSİAD Environment and Climate Change Working Group and Circular Economy Sub-Working Group and, also in 2023, we continued our contribution to the Environmental Working Group of the Electricity Distribution Services Association (ELDER). The Environmental Working Group of ELDER, established in 2021, aims to promote collaboration and consistency in the environmental management practices of electricity distribution companies. Additionally, Enerjisa Enerji is a participant in the Business World Plastics Initiative initiated by TÜSİAD, and an ongoing collaborator with the Business World and Sustainable Development Association (SKD Türkiye).

Our CEO has been serving as the Chairperson of EUROGIA2020, a EUREKA Cluster for low-carbon energy technologies; EUROGIA2020 is a market- and industry-driven initiative that works across the entire energy value chain, from renewable energy and efficiency

to reducing energy consumption and carbon emissions from fossil fuels. In addition to his position on the ELDER Board of Directors, our CEO serves as the Chairman of the Board for the E-mobility Operators Association (E-MOD). Moreover, members of Enerjisa Enerji's executive team are actively engaged as board or steering committee members at various organizations, including The Blockchain Türkiye Platform, the Artificial Intelligence and Technology Association, the Energy Digitalization Association, the Association of Young Executives and Business People, and the Women in Technology Association and Yeniden Biz Association.

At Enerjisa Enerji, we focus on diversity, equality and inclusion in all our processes. We take an active role in NGOs and platforms working on diversity, equality and inclusion in order to raise social awareness and consciousness on these issues. As a founding member company of the Sabancı University Business Against Domestic Violence (BADV) project, we actively participated in the network's initiatives in 2023. A recipient of support from the Sabancı Foundation and UNFPA, the project was hosted by TÜSİAD and conducted by the Sabancı University Corporate Governance Forum, serving as a collaborative effort to

address domestic violence. We support and take an active role in projects to empower women through organizations such as TurkishWIN and the Women in Technology Association and Yeniden Biz Association. The full list of member organizations is provided in the Annexes.

Corporate Stakeholder Engagement Plan

We prepared a Corporate Stakeholder Engagement Plan within the scope of the loan agreement signed with the European Bank for Reconstruction and Development (EBRD) in 2019 and in accordance with the conditions

of EBRD Requirement 10 (EBRD PR10): "Information Disclosure and Stakeholder Engagement"; and we update the Plan every year. The Corporate Stakeholder Engagement Plan establishes a framework for stakeholder engagement, public consultation, stakeholder identification and grievance mechanisms that we plan to execute at the corporate level, as well as their implementation processes.

The Corporate Stakeholder Engagement Plan will be disclosed on the Enerjisa investor relations website.





SUSTAINABILITY PRINCIPLES COMPLIANCE REPORT

					Explanation	Report Information on Publicly Disclosed Information (Page number, menu name on the website)
	Yes	Partial	No	Not Applicable		
Sustainability Compliance Report						
A. GENERAL PRINCIPLES						
A1.1. The prioritised environmental, social and corporate governance (ESG) issues, risks and opportunities have been determined by the Company's Board of Directors.	X				There is a Sustainability Executive Committee includes the executives of the relevant business units. The committee meets regularly and evaluates ESG priority issues, risks and opportunities. Within this framework, it determines the Company's short-, medium- and long-term strategies and action plans, makes the necessary revisions in its current policies, and creates new policies and procedures. Additionally, ESG issues are discussed in the Corporate Governance Committee and Early Detection of Risk Committee set under the Board of Directors and the Board of Directors is informed.	"https://www.enerjisa.com.tr/en/sustainability https://www.enerjisa.com.tr/en/sustainability/enerjisaenerji2023sustainabilityreport.pdf (Pg.30-35,119-130)"
A1.1. The ESG policies (Environmental Policy, Energy Policy, Human Rights and Employee Policy etc.) have been created and disclosed to the public by the Company's Board of Directors.	X				ESG Policies are published on the website.	https://www.enerjisa.com.tr/en/corporate-governance/policies
A1.2. The short and long-term targets set within the scope of ESG policies have been disclosed to the public.	X				Enerjisa Enerji undertakes sustainability perspective in all its core business areas and adapts its corporate strategy to this. In addition, while positioning itself in the energy world of the future, it created its short, medium and long-term targets and disclosed them through the Sustainability Report.	"https://www.enerjisa.com.tr/en/sustainability/enerjisaenerji2023sustainabilityreport.pdf (Pg. 46-47)"
A2. Implementation/Monitoring						
A2.1. The responsible committees and/or business units for the implementation of ESG policies and the senior officials related to ESG issues in the Company and their duties have been identified and disclosed to the public.	X				There is a Sustainability Executive Committee which includes executives of the relevant business units.	"https://www.enerjisa.com.tr/en/corporate-governance/committees https://www.enerjisa.com.tr/en/corporate-governance/committees/enerjisaenerji2023sustainabilityreport.pdf" (Pg.181)"
A2.1. The activities carried out within the scope of policies by the responsible committee and/or unit have been reported to the Board of Directors at least once a year.	X				Sustainability Executive Committee assigned with Sustainability Principles Compliance activities reports to the Board of Directors.	"https://www.enerjisa.com.tr/en/sustainability/enerjisaenerji2023sustainabilityreport.pdf (Pg.181)"
A2.2. In line with the ESG targets, the implementation and action plans have been formed and disclosed to the public.	X				ESG targets, materiality matrix and implementation-action plans are disclosed in Sustainability Report. The implementation and action plans are detailed under individual section they are executed.	"https://www.enerjisa.com.tr/en/sustainability/enerjisaenerji2023sustainabilityreport.pdf (Pg.46,47,30,48-130)"
A2.3. The Key ESG Performance Indicators (KPI) and the level of reaching these indicators have been disclosed to the public on yearly basis.	X				ESG performance indicators covering the last three years retrospectively, are explained in Sustainability and/or Annual Reports.	"https://www.enerjisa.com.tr/en/sustainability/enerjisaenerji2023sustainabilityreport.pdf (Pg.146-153) https://www.enerjisa.com.tr/en/sustainability/enerjisaenerji2023annualreport.pdf (Pg.280-283)"

					Explanation	Report Information on Publicly Disclosed Information (Page number, menu name on the website)
	Yes	Partial	No	Not Applicable		
A2.4. The activities for improving the sustainability performance of the business processes or products and services have been disclosed to the public.	X				Enerjisa Enerji explains the activities taken to improve sustainability performance for business processes or products and services in its Annual and/or Sustainability Reports.	"https://www.enerjisa.com.tr/en/sustainability/enerjisaenerji2023sustainabilityreport.pdf https://www.enerjisa.com.tr/en/sustainability/enerjisaenerji2023annualreport.pdf"
A3. Reporting						
A3.1. The information about the sustainability performance, targets and actions have been given in annual reports of the Company in an understandable, accurate and sufficient manner.	X				Enerjisa Enerji discloses its sustainability performance and actions to the public once a year in its Sustainability Report. The Sustainability section in the Annual Report also includes sustainability activities.	"https://www.enerjisa.com.tr/en/sustainability/enerjisaenerji2023annualreport.pdf (Pg.178-225) https://www.enerjisa.com.tr/en/sustainability/sustainability-reports/"
A3.2. The information about activities which are related to the United Nations (UN) 2030 Sustainable Development Goals have been disclosed to the public.	X				Enerjisa Enerji links its activities with the UN Sustainable Development Goals for 2030 in its Sustainability Report.	"https://www.enerjisa.com.tr/en/sustainability/enerjisaenerji2023sustainabilityreport.pdf (Pg.46, 47)"
A3.3. The lawsuits filed and/or concluded against the Company about ESG issues which are material in terms of ESG policies and/or will significantly affect the Company's activities, have been disclosed to the public.	X				Necessary disclosures on this issue are made in the Sustainability Report.	"https://www.enerjisa.com.tr/en/sustainability/enerjisaenerji2023surdurulebilirlikraporu.pdf (Pg.118, 152)"
A4. Verification						
A4.1. The Company's Key ESG Performance metrics have been verified by an independent third party and publicly disclosed.	X				In 2023, a verification study has been made by independent third party and disclosed in the 2023 Sustainability Report.	"https://www.enerjisa.com.tr/en/sustainability/enerjisaenerji2023sustainabilityreport.pdf (Pg.132-134)"
B. ENVIRONMENTAL PRINCIPLES						
B1. The policies and practices, action plans, environmental management systems (known by the ISO 14001 standard) and programs have been disclosed.	X				Enerjisa Enerji discloses its policies and practices, action plans, environmental management systems (ISO 14001 standard) and programs in the field of environmental management on its website and/or Annual and/or Sustainability Reports.	"https://www.enerjisa.com.tr/en/sustainability/enerjisaenerji2023annualreport.pdf https://www.enerjisa.com.tr/en/sustainability/enerjisaenerji2023sustainabilityreport.pdf https://www.enerjisa.com.tr/en/corporate-governance/policies/"
B2. The environmental reports prepared to provide information on environmental management have been disclosed to the public which is including the scope, reporting period, reporting date and limitations about the reporting conditions.	X				These issues are addressed in the Limited Assurance Report within Sustainability Reports.	"https://www.enerjisa.com.tr/en/sustainability/enerjisaenerji2023sustainabilityreport.pdf (Pg.132-142)"
B4. The environmental targets within the scope of performance incentive systems which included in the rewarding criteria have been disclosed to the public on the basis of stakeholders (such as members of the Board of Directors, managers and employees).	X				Necessary disclosures on this issue are made in the CDP Reports.	"https://www.enerjisa.com.tr/en/sustainability/cdpclimatechangeandwatersecurity2024.pdf"



SUSTAINABILITY PRINCIPLES COMPLIANCE REPORT

					Explanation	Report Information on Publicly Disclosed Information (Page number, menu name on the website)
	Yes	Partial	No	Not Applicable		
B5. How the prioritised environmental issues have been integrated into business objectives and strategies has been disclosed.	X				Enerjisa Enerji aims to develop a strategic and holistic approach related to economic, environmental and social factors and create long-term value by focusing on sustainability. Progress in this area is explained in detail in the Sustainability Reports.	https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3198/enerjisaenerji2023sustainabilityreport.pdf
B7. The way of how environmental issues has been managed and integrated into business objectives and strategies throughout the Company's value chain, including the operational process, suppliers and customers has been disclosed.	X				Enerjisa Enerji expects its suppliers to comply with highest ESG standards and to have processes in place to achieve this. In this context, it asks its suppliers to sign the Enerjisa Supplier Code of Conduct and Compliance Statement and to comply with both the Enerjisa Enerji Anti-Bribery and Anti-Corruption Policy and the OHS and Environmental Policies. In addition, Enerjisa Enerji offers end-to-end solutions to its customers to increase energy efficiency and reduce carbon emissions under the umbrella of 'The Energy of My Business'.	" https://www.enerjisainvestorrelations.com/en/corporate-governance/policies https://www.enerjisainvestorrelations.com/en/sustainability/cdp-reports "
B8. Whether the Company have been involved to environmental related organizations and non-governmental organizations' policy making processes and collaborations with these organizations has been disclosed.	X				Collaborations with associations, collaborations involving Board members and senior management are announced.	" https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3198/enerjisaenerji2023sustainabilityreport.pdf (Pg. 28, 29)"
B9. In the light of environmental indicators (Greenhouse gas emissions (Scope-1 (Direct), Scope-2 (Energy indirect), Scope-3 (Other indirect), air quality, energy management, water and wastewater management, waste management, biodiversity impacts)), information on environmental impacts is periodically disclosed to the public in a comparable manner.	X				Enerjisa Enerji includes these indicators in its Sustainability Reports.	" https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3198/enerjisaenerji2023sustainabilityreport.pdf (Pg.146)"
B10. Details of the standard, protocol, methodology, and baseline year used to collect and calculate data has been disclosed.	X				References, such as the calculation of greenhouse gas emissions according to the GHG Protocol with reference to the IPCC AR5 report, are included in the Sustainability Reports.	" https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3198/enerjisaenerji2023sustainabilityreport.pdf (Pg. 141)"
B11. The increase or decrease in Company's environmental indicators as of the reporting year has been comparatively disclosed with previous years.	X				Enerjisa Enerji includes these indicators in its Sustainability Reports. All ESG performance indicators for the year 2023 will be disclosed in the 2023 Sustainability Report.	" https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3198/enerjisaenerji2023sustainabilityreport.pdf (Pg.146)"
B12. The short and long-term targets for reducing the environmental impacts have been determined and the progress compared to previous years' targets has been disclosed.	X				The short-, medium- and long-term targets are determined and disclosed in the 2022 Sustainability Report.	" https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3198/enerjisaenerji2023sustainabilityreport.pdf (Pg.46)"

					Explanation	Report Information on Publicly Disclosed Information (Page number, menu name on the website)
	Yes	Partial	No	Not Applicable		
B13. A strategy to combat the climate crisis has been created and the planned actions have been publicly disclosed.	X				Enerjisa discloses the actions planned within its climate strategy to the public in the Sustainability Report and CDP Reports.	" https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3198/enerjisaenerji2023sustainabilityreport.pdf (Pg.80-84) https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3134/cdpclimatechangeandwatersecurity2024.pdf "
B14. The programs/procedures to prevent or minimize the potential negative impact of products and/or services on the environment have been established and disclosed.	X				In order to expand its renewable portfolio volume, Enerjisa Enerji signed bilateral agreements to supply electricity directly from power plants that generate energy from renewable energy resources. The company offers its customers carbon reduction and renewable energy certificates in its product portfolio. In addition, it offers end-to-end solutions to increase energy efficiency and reduce carbon emissions under the "The Energy of My Business" framework.	" https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3198/enerjisaenerji2023sustainabilityreport.pdf (Pg.52-55)"
B14. The actions to reduce greenhouse gas emissions of third parties (suppliers, subcontractors, dealers, etc.) have been carried out and disclosed.	X				Enerjisa Enerji expects its suppliers to comply with highest ESG standards and to have processes in place to achieve this. In this context, it asks its suppliers to sign the Enerjisa Supplier Code of Conduct and Compliance Statement and to comply with both the Enerjisa Enerji Anti-Bribery and Anti-Corruption Policy and the OHS and Environment and Water Policies.	" https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3198/enerjisaenerji2023sustainabilityreport.pdf (Pg.52-55) https://www.enerjisainvestorrelations.com/en/corporate-governance/policies "
B15. The environmental benefits/gains and cost savings of initiatives/projects that aims reducing environmental impacts have been disclosed.	X				Enerjisa Enerji takes many actions to reduce its environmental impacts. In order to reduce environmental impacts in its activities, it conducts optimization studies on issues such as resource use and energy consumption, offers its customers products that reduce environmental impacts and develops projects within this scope. In addition, Enerjisa Enerji develops products, processes and services with its R&D and Innovation units, to reduce environmental impacts. The details are provided in the Annual and / or Sustainability Reports. Costs-benefits analysis is performed for projects, and the process to report financial gains and effects is continuing.	" https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3134/cdpclimatechangeandwatersecurity2024.pdf (Pg.211-213) https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3198/enerjisaenerji2023sustainabilityreport.pdf https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3033/enerjisaenerji2023annualreport.pdf "
B16. The data related to energy consumption (natural gas, diesel, gasoline, LPG, coal, electricity, heating, cooling, etc.) has been disclosed as Scope-1 and Scope-2.	X				Scope 1 and Scope 2 GHG emissions are regularly calculated within the scope of sustainability efforts, which are verified by an independent third party and publicly disclosed.	" https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3198/enerjisaenerji2023sustainabilityreport.pdf (Pg.146)"
B17. The information related to production of electricity, heat, steam and cooling as of the reporting year has been disclosed.				X	"Electricity production, heat, steam and cooling are not within the scope of Enerjisa Enerji's operations"	



SUSTAINABILITY PRINCIPLES COMPLIANCE REPORT

					Explanation	Report Information on Publicly Disclosed Information (Page number, menu name on the website)
	Yes	Partial	No	Not Applicable		
B18. The studies related to increase the use of renewable energy and transition to zero/ low carbon electricity have been conducted and disclosed.	X				Enerjisa Enerji gives importance to providing its customers with sustainable and innovative solutions. In this context, end-to-end solutions aimed at increasing the energy efficiency of corporate customers and reducing their carbon emissions were restructured under "The Energy of My Business" roof in October 2020. This portfolio includes many environmentally friendly and sustainable energy solutions, ranging from solar power plants installation services, energy efficiency applications, cogeneration/trigeneration applications and electric vehicle charging station management to green energy certifications. Enerjisa Enerji also works to reduce carbon emissions and increase energy efficiency in its own consumption. In addition, 98.68% of the electricity consumption in all Enerjisa facilities was met from green energy supply. Data related to these issues are disclosed in or Sustainability Reports.	"https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3198/enerjisaenerji2023sustainabilityreport.pdf (Pg.12, 52-55)"
B19. The renewable energy production and usage data has been publicly disclosed.	X				"Information on renewable energy supply is disclosed in the Sustainability Report. Enerjisa Enerji is not involved directly in production activities."	"https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3198/enerjisaenerji2023sustainabilityreport.pdf (Pg.12, 146)"
B20. The Company conducted projects about energy efficiency and the amount of reduction on energy consumption and emission achieved through these projects have been disclosed.	X				Energy consumption savings and emission reduction amounts are disclosed in the Sustainability Report.	"https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3198/enerjisaenerji2023sustainabilityreport.pdf (Pg.12, 84)"
B21. The water consumption, the amount, procedures and sources of recycled and discharged water from underground or above ground (if any), have been disclosed.	X				Water consumption and water use data, sources and procedures are disclosed in the CDP Water Security, Sustainability Reports and in the Water Policy.	"https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3198/enerjisaenerji2023sustainabilityreport.pdf (Pg.12, 84)"
B21. The water consumption, the amount, procedures and sources of recycled and discharged water from underground or above ground (if any), have been disclosed.	X				Water consumption and water use data, sources and procedures are disclosed in the CDP Water Security, Sustainability Reports and in the Water Policy.	"https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3198/enerjisaenerji2023sustainabilityreport.pdf (Pg.147)" https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/2875/cdpwatersecurity2023.pdf https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/2700/waterpolicy.pdf"
B22. The information related to whether Company's operations or activities are included in any carbon pricing system (Emissions Trading System, CAP&Trade or Carbon Tax).			X		Enerjisa's operations and activities are not included in any carbon pricing system (Emission Trading System, CAP&Trade or Carbon Tax).	

					Explanation	Report Information on Publicly Disclosed Information (Page number, menu name on the website)
	Yes	Partial	No	Not Applicable		
B23. The information related to accumulated or purchased carbon credits within the reporting period has been disclosed.				X		
B24. If carbon pricing is applied within the Company, the details have been disclosed.	X				Carbon pricing applications are explained in the CDP report.	"https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3134/cdpclimatechangeandwatersecurity2024.pdf (Pg.129-132)"
B25. The platforms where the Company discloses its environmental information have been disclosed.	X				CDP Report of Enerjisa is publicly disclosed. In addition, environmental information is disclosed through LSEG Refinitiv, FTSE Russel ESG and Sustainalitics platforms, and in the Annual and Sustainability Reports.	"https://www.enerjisainvestorrelations.com/en/sustainability/cdp-reports/" https://www.enerjisainvestorrelations.com/en/sustainability/esg-performance/" https://www.enerjisainvestorrelations.com/en/financial-information/financial-results--reports--annual-reports/" https://www.enerjisainvestorrelations.com/en/sustainability/sustainability-reports"
C. SOCIAL PRINCIPLES						
C1. Human Rights and Employee Rights						
C1.1. The Institutional Human Rights and Employee Rights Policy has been established in the light of the Universal Declaration of Human Rights, ILO Conventions ratified by Turkey and other relevant legislation. The policy and the officials that responsible for the implementation of it have been determined and disclosed.	X				Enerjisa Enerji's Human Rights and Human Resources, Zero Tolerance Policy Towards Violence and Anti-Retaliation Policies address these issues.	https://www.enerjisainvestorrelations.com/en/corporate-governance/policies
C1.2. Considering the effects of supply and value chain, fair workforce, improvement of labour standards, women's employment and inclusion issues (gender, race, religion, language, marital status, ethnic identity, sexual orientation, gender identity, family responsibilities, union activities, political opinion, disability, social and cultural differences, etc., such as non-discrimination) are included in its policy on employee rights.	X				Enerjisa Enerji explains its approach in consideration with supply chain and value chain effects of these issues in its Human Rights, Human Resources and Diversity and Inclusion, Zero Tolerance Policy Towards Violence and Third-Party Relations Policies.	https://www.enerjisainvestorrelations.com/en/corporate-governance/policies/
C1.3. The measures taken for the minority rights/equality of opportunity or the ones who are sensitive about certain economic, environmental, social factors (low income groups, women, etc.) along the supply chain have been disclosed.	X				Enerjisa Enerji explains its approach to equal opportunities and discrimination in its Human Rights, Human Resources, and Diversity and Inclusion Policies and discloses the measures taken in Sustainability Reports.	"https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3198/enerjisaenerji2023sustainabilityreport.pdf (Pg.106-112)" https://www.enerjisainvestorrelations.com/en/corporate-governance/policies"
C1.4. The developments regarding preventive and corrective practices against discrimination, inequality, human rights violations, forced and child labour have been disclosed.	X				Enerjisa Enerji includes its procedures on these issues in its Human Rights Policy.	https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/40/humanrightspolicy.pdf



SUSTAINABILITY PRINCIPLES COMPLIANCE REPORT

					Explanation	Report Information on Publicly Disclosed Information (Page number, menu name on the website)
	Yes	Partial	No	Not Applicable		
C15. Investments in employees (education, development policies), compensation, fringe benefits, right to unionize, work/life balance solutions and talent management are included in the employee rights policy.	X				Enerjisa Enerji publishes its policies and practices concerning employee rights and talent management on the company's website.	https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/401/humanrightspolicy.pdf https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/410/compensationpolicy.pdf https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/402/humanresourcespolicy.pdf
C15. The mechanism for employee complaints and resolution of disputes have been established and related solution processes have been determined.	X				Mechanisms for employee complaints and conflicts are disclosed in the Sustainability Report.	" https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3198/enerjisaenerji2023sustainabilityreport.pdf (Pg.99, 114, 159)"
C15. The activities carried out within the reporting period which related to ensure employee satisfaction have been disclosed.	X				Enerji Enerji's activities on employee satisfaction are disclosed in the Sustainability Report. The activities for the year 2024 will be disclosed in the 2024 Annual Report and 2024 Sustainability Report.	https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3198/enerjisaenerji2023sustainabilityreport.pdf (Pg.97-102) https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3033/enerjisaenerji2023annualreport.pdf (Pg.148-150)
C16. The occupational health and safety policies have been established and disclosed.	X				Enerjisa Enerji published its Health and Safety Policy on its website.	https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/403/healthsafetypolicy.pdf
C16. The measures taken for protecting health, preventing occupational accidents and related statistics have been disclosed.	X				Proactively managing OHS risks is a priority for Enerjisa Enerji at the senior management level. Details concerning the Occupational Health and Safety Policy are available on the website. The measures taken and accident statistics are included in the Sustainability Reports.	https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3198/enerjisaenerji2023sustainabilityreport.pdf (Pg.147) https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/403/healthsafetypolicy.pdf
C17. The personal data protection and data security policies have been established and disclosed.	X				Enerjisa Enerji discloses its Data Security Policy and Information Security Management Approach on its website.	https://www.enerjisa.com.tr/en/about-enerjisa-company-profile/policies https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/400/informationsecuritymanagementapproach.pdf
C18. The ethics policy have been established and disclosed.	X				Enerjisa Enerji has a Code of Conduct, which has been shared with all stakeholders both internally and on the website.	https://www.enerjisainvestorrelations.com/en/corporate-governance/code-of-ethics/ https://www.enerjisainvestorrelations.com/medium/Content/File/2614/enerjisacodeofconduct.pdf
C19. The studies related to social investment, social responsibility, financial inclusivity and access to finance have been explained.	X				Enerjisa Enerjisa discloses its CSR and community investments in the Sustainability Report.	https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3198/enerjisaenerji2023sustainabilityreport.pdf (Pg.12, 92-96, 112)
C1.10. The informative meetings and training programs related to ESG policies and practices have been organized for employees.	X				Enerjisa Enerji provides training on Occupational Health and Safety and Environment, Ethics, Risk Management, Customer Satisfaction within the scope of ESG. Details are provided in the Sustainability Reports.	https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3198/enerjisaenerji2023sustainabilityreport.pdf

					Explanation	Report Information on Publicly Disclosed Information (Page number, menu name on the website)
	Yes	Partial	No	Not Applicable		
C2. Stakeholders, International Standards and Initiatives						
C2.1. The customer satisfaction policy regarding the management and resolution of customer complaints has been prepared and disclosed.	X				Customer Satisfaction is a primary focus of Enerjisa Enerji's corporate strategy. Customer Satisfaction Policy is published on the website.	https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/2721/customerstatisfactionpolicy.pdf
C2.2. The information about the communication with stakeholders (which stakeholder, subject and frequency) have been disclosed.	X				Stakeholders' views were considered within the scope of the materiality analysis. The Corporate Stakeholder Participation Plan can be accessed on the website. Details on stakeholder communication are included in the Sustainability Report.	https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3198/enerjisaenerji2023sustainabilityreport.pdf (Pg. 28-30) https://www.enerjisainvestorrelations.com/en/sustainability/corporate-stakeholder-engagement/
C2.3. The international reporting standards that adopted in reporting have been explained.	X				Enerjisa Enerji details its reporting standards (GRI) in its Sustainability Report.	https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3198/enerjisaenerji2023sustainabilityreport.pdf (Pg. 8, 154-165)
C2.4. The principles adopted regarding sustainability, the signatory or member international organizations, committees and principles have been disclosed.	X				Enerjisa Enerji is a signatory of the UN Global Compact, the UN Women's Empowerment Principles (WEPs) and IPG Business Plastics Initiative. This information is included in the Sustainability Reports.	https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3198/enerjisaenerji2023sustainabilityreport.pdf (Pg.10, 23, 36, 38, 110, 144-145)
C2.5. The improvements have been made and studies have been carried out in order to be included in the Borsa Istanbul sustainability indices and/or international index providers.	X				"Enerjisa Enerji is included in the Borsa Istanbul Sustainability Index since 2019, and continues to follow the standards and requirements of international indices to ensure compliance.	https://www.enerjisainvestorrelations.com/en/stock--debt-instruments/stock-information/index-info/
D. CORPORATE GOVERNANCE PRINCIPLES						
D1. The opinions of stakeholders have been sought in the determination of measures and strategies related to sustainability field.	X				Stakeholders' views were considered within the scope of the materiality analysis.	https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3198/enerjisaenerji2023sustainabilityreport.pdf (Pg.28, 30, 38)
D2. The social responsibility projects, awareness activities and trainings have been carried out to raise awareness about sustainability and its importance.	X				Enerjisa Enerji discloses this information in its Annual, Sustainability Reports and on its website.	https://www.enerjisa.com.tr/en/sustainability/impact-for-society/corporate-responsibility https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/3198/enerjisaenerji2023sustainabilityreport.pdf (Pg.93-96)



Corporate Governance

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CORPORATE GOVERNANCE COMPLIANCE REPORT

Corporate Governance Compliance Report	Company Compliance Status					Explanation
	Yes	Partial	No	Exempted	Not Applicable	
1.1. FACILITATING THE EXERCISE OF SHAREHOLDER RIGHTS						
1.1.2- Up-to-date information and disclosures which may affect the exercise of shareholder rights are available to investors at the corporate website.	X					
1.2. RIGHT TO OBTAIN AND REVIEW INFORMATION						
1.2.1 - Management did not enter into any transaction that would complicate the conduct of special audit.	X					
1.3. GENERAL ASSEMBLY						
1.3.2 - The company ensures the clarity of the General Assembly agenda, and that an item on the agenda does not cover multiple topics.	X					
1.3.7- Insiders with privileged information have informed the board of directors about transactions conducted on their behalf within the scope of the company's activities in order for these transactions to be presented at the General Shareholders' Meeting.					X	No transaction under this item occurred in 2024.
1.3.8 - Members of the board of directors who are concerned with specific agenda items, auditors, and other related persons, as well as the officers who are responsible for the preparation of the financial statements were present at the General Shareholders' Meeting.		X				Independent auditors, Chairman of the Board, some of the Independent Board Members, some of the Board Members, CEO and the relevant managers physically attended to the AGM.
1.3.10 - The agenda of the General Shareholders' Meeting included a separate item detailing the amounts and beneficiaries of all donations and contributions.	X					All donations and grants are presented to the General Assembly and made in accordance with the Donation and Grants Policy. The total amount of the donations was disclosed. Details of the recipients are planned to be disclosed in the upcoming AGM in 2024.
1.3.11 - The General Shareholders' Meeting was held open to the public, including the stakeholders, without having the right to speak.			X			There is no article in the articles of association that regulates the participation of stakeholders in the General Assembly. However, the General Assembly Meeting minutes are made available to all stakeholders via the Public Disclosure Platform and the Company's corporate website.
1.4. VOTING RIGHTS						
1.4.1 - There is no restriction preventing shareholders from exercising their shareholder rights.	X					
1.4.2 - The company does not have shares that carry privileged voting rights.	X					
1.4.3 - The company withholds from exercising its voting rights at the General Shareholders' Meeting of any company with which it has cross-ownership, in case such cross-ownership provides management control.					X	There are no companies in which Enerjisa has cross-ownerships.
1.5. MINORITY RIGHTS						
1.5.1 - The company pays maximum diligence to the exercise of minority rights.	X					
1.5.2 - The Articles of Association extend the use of minority rights to those who own less than one twentieth of the outstanding shares, and expand the scope of the minority rights.			X			Minority rights are determined in accordance with the relevant legislation, and there is no specific provision for the extension of minority rights in the Articles of Association. At the same time, attention is paid to the use of minority rights within the scope of TCC and CMB regulations.
1.6. DIVIDEND RIGHT						
1.6.1 - The dividend policy approved by the General Shareholders' Meeting is posted on the company website.	X					
1.6.2 - The dividend distribution policy comprises the minimum information to ensure that the shareholders can have an opinion on the procedure and principles of dividend distributions in the future.	X					
1.6.3 - The reasons for retaining earnings, and their allocations, are stated in the relevant agenda item.					X	This was not stated as Enerjisa distributed dividend.
1.6.4 - The board reviewed whether the dividend policy balances the benefits of the shareholders and those of the company.	X					

Corporate Governance Compliance Report	Company Compliance Status					Explanation
	Yes	Partial	No	Exempted	Not Applicable	
1.7. TRANSFER OF SHARES						
1.7.1 - There are no restrictions preventing shares from being transferred.	X					
2.1. CORPORATE WEBSITE						
2.1.1 - The company website includes all elements listed in Corporate Governance Principle 2.1.1.	X					
2.1.2 - The shareholding structure (names, privileges, number and ratio of shares, and beneficial owners of more than 5% of the issued share capital) is updated on the website at least every 6 months.	X					
2.1.4 - The company website is prepared in other selected foreign languages, in a way to present exactly the same information with the Turkish content.	X					
2.2. ANNUAL REPORT						
2.2.1 - The board of directors ensures that the annual report represents a true and complete view of the company's activities.	X					
2.2.2 - The annual report includes all elements listed in Corporate Governance Principle 2.2.2.	X					
3.1. CORPORATION'S POLICY ON STAKEHOLDERS						
3.1.1 - The rights of the stakeholders are protected pursuant to the relevant regulations, contracts and within the framework of bona fides principles.	X					
3.1.3 - Policies or procedures addressing stakeholders' rights are published on the company's website.	X					
3.1.4 - A whistleblowing programme is in place for reporting legal and ethical issues.	X					
3.1.5 - The company addresses conflicts of interest among stakeholders in a balanced manner.	X					
3.2. SUPPORTING THE PARTICIPATION OF THE STAKEHOLDERS IN THE CORPORATION'S MANAGEMENT						
3.2.1 - The Articles of Association, or the internal regulations (terms of reference/manuals), regulate the participation of employees in management.	X					
3.2.2 - Surveys/other research techniques, consultation, interviews, observation method etc. were conducted to obtain opinions from stakeholders on decisions that significantly affect them.	X					
3.3. HUMAN RESOURCES POLICY						
3.3.1 - The company has adopted an employment policy ensuring equal opportunities, and a succession plan for all key managerial positions.	X					
3.3.2 - Recruitment criteria are documented.	X					
3.3.3 - The company has a policy on human resources development, and organises trainings for employees.	X					
3.3.4 - Meetings have been organised to inform employees on the financial status of the company, remuneration, career planning, education and health.	X					
3.3.5 - Employees, or their representatives, were notified of decisions impacting them. The opinion of the related trade unions was also taken.	X					
3.3.6 - Job descriptions and performance criteria have been prepared for all employees, announced to them and taken into account to determine employee remuneration.	X					
3.3.7 - Measures (procedures, trainings, raising awareness, goals, monitoring, complaint mechanisms) have been taken to prevent discrimination, and to protect employees against any physical, mental, and emotional mistreatment.	X					
3.3.8 - The company ensures freedom of association and supports the right for collective bargaining.	X					
3.3.9 - A safe working environment for employees is maintained.	X					



CORPORATE GOVERNANCE COMPLIANCE REPORT

Corporate Governance Compliance Report	Company Compliance Status					Explanation
	Yes	Partial	No	Exempted	Not Applicable	
3.4. RELATIONS WITH CUSTOMERS AND SUPPLIERS						
3.4.1 - The company measured its customer satisfaction, and operated to ensure full customer satisfaction.	X					
3.4.2 - Customers are notified of any delays in handling their requests.	X					
3.4.3 - The company complied with the quality standards with respect to its products and services.	X					
3.4.4 - The company has in place adequate controls to protect the confidentiality of sensitive information and business secrets of its customers and suppliers.	X					
3.5. ETHICAL RULES AND SOCIAL RESPONSIBILITY						
3.5.1 - The board of the corporation has adopted a code of ethics, disclosed on the corporate website.	X					
3.5.2 - The company has been mindful of its social responsibility and has adopted measures to prevent corruption and bribery.	X					
4.1. ROLE OF THE BOARD OF DIRECTORS						
4.1.1 - The board of directors has ensured strategy and risks do not threaten the long-term interests of the company, and that effective risk management is in place.	X					
4.1.2 - The agenda and minutes of board meetings indicate that the board of directors discussed and approved strategy, ensured resources were adequately allocated, and monitored company and management performance.	X					
4.2. ACTIVITIES OF THE BOARD OF DIRECTORS						
4.2.1 - The board of directors documented its meetings and reported its activities to the shareholders.	X					
4.2.2 - Duties and authorities of the members of the board of directors are disclosed in the annual report.	X					
4.2.3 - The board has ensured the company has an internal control framework adequate for its activities, size and complexity.	X					
4.2.4 - Information on the functioning and effectiveness of the internal control system is provided in the annual report.	X					
4.2.5 - The roles of the Chairman and Chief Executive Officer are separated and defined.	X					
4.2.7 - The board of directors ensures that the Investor Relations department and the corporate governance committee work effectively. The board works closely with them when communicating and settling disputes with shareholders.	X					
4.2.8 - The company has subscribed to a Directors and Officers liability insurance covering more than 25% of the capital.	X					A directors and officers liability insurance with a limit of 20 million USD has been provided for the individual liability of the managers and members of the Board of Directors regarding their faults during their duties. The amount of the insurance covers 25% of the Company's paid in capital as of 31.12.2024.
4.3. STRUCTURE OF THE BOARD OF DIRECTORS						
4.3.9 - The board of directors has approved the policy on its own composition, setting a minimal target of 25% for female directors. The board annually evaluates its composition and nominates directors so as to be compliant with the policy.	X					The Board of Directors has 8 members. 3 members are women, making up 37.5% of the Board of Directors. 2 of the women members are Independent Board Members.
4.3.10 - At least one member of the audit committee has 5 years of experience in audit/accounting and finance.	X					
4.4. BOARD MEETING PROCEDURES						
4.4.1 - Each board member attend the majority of the board meetings in person or via an electronic board meeting system	X					
4.4.2 - The board has formally approved a minimum time by which information and documents relevant to the agenda items should be supplied to all board members.	X					

Corporate Governance Compliance Report	Company Compliance Status					Explanation
	Yes	Partial	No	Exempted	Not Applicable	
4.4.3 - The opinions of board members that could not attend the meeting, but did submit their opinion in written format, were presented to other members.	X					
4.4.4 - Each member of the board has one vote.	X					
4.4.5 - The board has a charter/written internal rules defining the meeting procedures of the board.	X					
4.4.6 - Board minutes document that all items on the agenda are discussed, and board resolutions include director's dissenting opinions if any.	X					
4.4.7 - There are limits to external commitments of board members. Shareholders are informed of board members' external commitments at the General Shareholders' Meeting.		X				Board Member's assignments in different companies are limited on the basis of not creating conflict of interest during their term of office. An additional restriction is not deemed necessary as the business and sectoral experience of BoD Members makes a vital contribution to the BoD. Members of the Board of Directors do not have an assignment outside the company that will create a conflict of interest. The biographies of the Board of Directors members have been made available to shareholders in the annual report and on the Investor Relations website.
4.5. BOARD COMMITTEES						
4.5.5 - Board members serve in only one of the Board's committees.		X				Care is taken to ensure that committee memberships are determined based on the experience and areas of expertise of the independent members; however, due to the limited number of independent Board members and the obligations outlined in capital markets legislation, members may be assigned to multiple committees.
4.5.6 - Committees have invited persons to the meetings as deemed necessary to obtain their views.	X					
4.5.7 - If external consultancy services are used, the independence of the provider is stated in the annual report.					X	No external consultancy service is used for Board Committees.
4.5.8 - Minutes of all committee meetings are kept and reported to board members.	X					
4.6. FINANCIAL RIGHTS						
4.6.1 - The board of directors has conducted a board performance evaluation to review whether it has discharged all its responsibilities effectively.	X					
4.6.4 - The company did not extend any loans to its board directors or executives, nor extended their lending period or enhanced the amount of those loans, or improve conditions thereon, and did not extend loans under a personal credit title by third parties or provided guarantees such as surety in favour of them.	X					
4.6.5 - The individual remuneration of board members and executives is disclosed in the annual report.		X				In disclosure of the remuneration and benefits provided to the Members of the Board of Directors and senior executives, a balance is targeted between the benefits of these persons that must be protected in terms of the Personal Data Protection Law and the transparency requirement of the shareholders and stakeholders in accordance with the Corporate Governance Communiqué. Remuneration Policy was prepared and presented to the shareholders and stakeholders as a separate item during the 2019 Ordinary General Assembly meeting. In addition, remuneration for the Members of the Board of Directors is submitted to the approval of the shareholders at the General Assembly meeting every year. Consolidated payments made to senior executives and Board of Directors are publicly disclosed in financial statement footnotes. Disclosure of remuneration in person, which is considered commercial secret for competitiveness, will be determined in line with the general practices in the country.



CORPORATE GOVERNANCE INFORMATION FORM

1. SHAREHOLDERS	
1.1. Facilitating the Exercise of Shareholders Rights	
The number of investor meetings (conference, seminar/etc.) organised by the company during the year	Enerjisa participated to 1 conference and in total had 50 meetings with existing and potential investors.
1.2. Right to Obtain and Examine Information	
The number of special audit request(s)	0
The number of special audit requests that were accepted at the General Shareholders' Meeting	0
1.3. General Assembly	
Link to the PDP announcement that demonstrates the information requested by Principle 1.3.1. (a-d)	https://www.kap.org.tr/en/Bildirim/1257546
Whether the company provides materials for the General Shareholders' Meeting in English and Turkish at the same time	All documents were presented in English simultaneously except the list of attendees. Since the list of attendees was taken from the system in Turkish, it was presented in Turkish.
The links to the PDP announcements associated with the transactions that are not approved by the majority of independent directors or by unanimous votes of present board members in the context of Principle 1.3.9	Such transactions do not exist.
The links to the PDP announcements associated with related party transactions in the context of Article 9 of the Communique on Corporate Governance (II-17.1)	No transactions in the scope of Article 9.
The links to the PDP announcements associated with common and continuous transactions in the context of Article 10 of the Communique on Corporate Governance (II-17.1)	https://www.kap.org.tr/en/Bildirim/1118284
The name of the section on the corporate website that demonstrates the donation policy of the company	Under the Corporate Governance - Policies section of the Investor Relations website https://www.enerjisainvestorrelations.com/en/corporate-governance/policies/
The relevant link to the PDP with minute of the General Shareholders' Meeting where the donation policy has been approved	https://www.kap.org.tr/en/Bildirim/1267664
The number of the provisions of the articles of association that discuss the participation of stakeholders to the General Shareholders' Meeting	N/A
Identified stakeholder groups that participated in the General Shareholders' Meeting, if any	https://www.kap.org.tr/en/Bildirim/1267664
1.4. Voting Rights	
Whether the shares of the company have differential voting rights	No
In case that there are voting privileges, indicate the owner and percentage of the voting majority of shares.	N/A
The percentage of ownership of the largest shareholder	40%
1.5. Minority Rights	
Whether the scope of minority rights enlarged (in terms of content or the ratio) in the articles of the association	No
If yes, specify the relevant provision of the articles of association.	N/A
1.6. Dividend Right	
The name of the section on the corporate website that describes the dividend distribution policy	Under the Corporate Governance - Policies section of the Investor Relations website https://www.enerjisainvestorrelations.com/en/corporate-governance/policies/
Minutes of the relevant agenda item in case the board of directors proposed to the general assembly not to distribute dividends, the reason for such proposal and information as to use of the dividend	Not proposed
PDP link to the related general shareholder meeting minutes in case the board of directors proposed to the general assembly not to distribute dividends	Not proposed

General Assembly Meetings									
General Meeting Date	The number of information requests received by the company regarding the clarification of the agenda of the General Shareholders' Meeting	Shareholder participation rate to the General Shareholders' Meeting	Percentage of shares directly present at the GSM	Percentage of shares represented by proxy	Specify the name of the page of the corporate website that contains the General Shareholders' Meeting minutes, and also indicates for each resolution the voting levels for or against	Specify the name of the page of the corporate website that contains all questions asked in the general assembly meeting and all responses to them	The number of the relevant item or paragraph of General Shareholders' Meeting minutes in relation to related party transactions	The number of declarations by insiders received by the board of directors	The link to the related PDP general shareholder meeting notification
04/04/2024	0	83.78%	0.00%	83.77%	Corporate Governance section of the IR web site.	https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/2957/enerjisa2023meetingminutesofordinarygeneralassembly.pdf	N/A	0	https://www.kap.org.tr/en/Bildirim/1282653

2. DISCLOSURE AND TRANSPARENCY	
2.1. Corporate Website	
Specify the name of the sections of the website providing the information requested by the Principle 2.1.1.	Under the tabs on the Investor Relations website.
If applicable, specify the name of the sections of the website providing the list of shareholders (ultimate beneficiaries) who directly or indirectly own more than 5% of the shares.	https://www.enerjisainvestorrelations.com/en/corporate/shareholder-structure
List of languages for which the website is available	Turkish and English
2.2. Annual Report	
The page numbers and/or name of the sections in the Annual Report that demonstrate the information requested by principle 2.2.2.	
a) The page numbers and/or name of the sections in the Annual Report that demonstrate the information on the duties of the members of the board of directors and executives conducted out of the company and declarations on independence of board members	SECTION NAME: DUTIES OF THE MEMBERS OF THE BOARD OF DIRECTORS AND EXECUTIVES CONDUCTED OUT OF THE COMPANY & SECTION NAME: DECLARATIONS OF INDEPENDENCE
b) The page numbers and/or name of the sections in the Annual Report that demonstrate the information on committees formed within the board structure	SECTION NAME: RISKS AND THE EVALUATION OF THE MANAGEMENT BODY/ COMMITTEES
c) The page numbers and/or name of the sections in the Annual Report that demonstrate the information on the number of board meetings in a year and the attendance of the members to these meetings	SECTION NAME: RISKS AND THE EVALUATION OF THE MANAGEMENT BODY/BOARD OF DIRECTORS MEETINGS
c) The page numbers and/or name of the sections in the Annual Report that demonstrate the information on amendments in the legislation which may significantly affect the activities of the corporation	SECTION NAME: COMPANY'S OPERATIONS AND RELATED MAJOR DEVELOPMENTS
d) The page numbers and/or name of the sections in the Annual Report that demonstrate the information on significant lawsuits filed against the corporation and the possible results thereof	SECTION NAME: COMPANY'S OPERATIONS AND RELATED MAJOR DEVELOPMENTS
e) The page numbers and/or name of the sections in the Annual Report that demonstrate the information on the conflicts of interest of the corporation among the institutions that it purchases services on matters such as investment consulting and rating and the measures taken by the corporation in order to avoid from these conflicts of interest	SECTION NAME: COMPANY'S OPERATIONS AND RELATED MAJOR DEVELOPMENTS
f) The page numbers and/or name of the sections in the Annual Report that demonstrate the information on the cross ownership subsidiaries that the direct contribution to the capital exceeds 5%	SECTION NAME: COMPANY'S OPERATIONS AND RELATED MAJOR DEVELOPMENTS
g) The page numbers and/or name of the sections in the Annual Report that demonstrate the information on social rights and professional training of the employees and activities of corporate social responsibility in respect of the corporate activities that arises social and environmental results	SECTION NAME: COMPANY'S OPERATIONS AND RELATED MAJOR DEVELOPMENTS

CORPORATE GOVERNANCE INFORMATION FORM

3. STAKEHOLDERS	
3.1. Corporation's Policy on Stakeholders	
The name of the section on the corporate website that demonstrates the employee remedy or severance policy	Under the Corporate Governance - Policies section of the Investor Relations website https://www.enerjisainvestorrelations.com/en/corporate-governance/policies/
The number of definitive convictions the company was subject to in relation to breach of employee rights	26
The position of the person responsible for the alert mechanism (i.e. whistleblowing mechanism)	Head of Internal Audit
The contact detail of the company alert mechanism	https://www.enerjisa.com.tr/en/about-enerjisa/company-profile/working-principlesethical-statement
3.2. Supporting the Participation of the Stakeholders in the Corporation's Management	
Name of the section on the corporate website that demonstrates the internal regulation addressing the participation of employees on management bodies	Human Resources Policy, under the Corporate Governance - Policies section of the Investor Relations website https://www.enerjisainvestorrelations.com/en/corporate-governance/policies/
Corporate bodies where employees are actually represented	https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/402/humanresourcespolicy.pdf
3.3. Human Resources Policy	
The role of the board on developing and ensuring that the company has a succession plan for the key management positions	Human Resources Policy; https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/402/humanresourcespolicy.pdf Corporate Governance Committee Charter; https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/918/corporategovernancecommitteecharter.pdf
The name of the section on the corporate website that demonstrates the human resource policy covering equal opportunities and hiring principles. Also provide a summary of relevant parts of the human resource policy.	Human Resources Policy and Diversity and Inclusion Policy under the Corporate Governance - Policies section of the Investor Relations website https://www.enerjisainvestorrelations.com/en/corporate-governance/policies/
Whether the company provides an employee stock ownership programme	There isn't an employee stock ownership programme
The name of the section on the corporate website that demonstrates the human resource policy covering discrimination and mistreatments and the measures to prevent them. Also provide a summary of relevant parts of the human resource policy.	Human Resources Policy, Anti-Retaliation Policy and Diversity and Inclusion Policy under the Corporate Governance - Policies section of the Investor Relations website https://www.enerjisainvestorrelations.com/en/corporate-governance/policies/
The number of definitive convictions the company is subject to in relation to health and safety measures	8
3.5. Ethical Rules and Social Responsibility	
The name of the section on the corporate website that demonstrates the code of ethics	https://www.enerjisainvestorrelations.com/en/corporate-governance/code-of-ethics
The name of the section on the company website that demonstrates the corporate social responsibility report. If such a report does not exist, provide the information about any measures taken on environmental, social and corporate governance issues.	https://www.enerjisainvestorrelations.com/en/sustainability/sustainability-reports-menu
Any measures combating any kind of corruption including embezzlement and bribery	Anti-Bribery and Anti-Corruption Policy under the Corporate Governance - Policies section of the Investor Relations website https://www.enerjisainvestorrelations.com/en/corporate-governance/policies/

4. BOARD OF DIRECTORS-I	
4.2. Activity of the Board of Directors	
Date of the last board evaluation conducted	28.11.2024
Whether the board evaluation was externally facilitated	No
Whether all board members released from their duties at the GSM	Yes
Name(s) of the board member(s) with specific delegated duties and authorities, and descriptions of such duties	N/A
Number of reports presented by internal auditors to the audit committee or any relevant committee to the board	29 process audit reports and 115 ethics investigations
Specify the name of the section or page number of the annual report that provides the summary of the review of the effectiveness of internal controls	SECTION NAME: COMPANY'S OPERATIONS AND RELATED MAJOR DEVELOPMENTS
Name of the Chairman	Kıvanç Zaimler
Name of the CEO	Murat Pınar
If the CEO and Chair functions are combined: provide the link to the relevant PDP announcement providing the rationale for such combined roles	Not combined.
Link to the PDP notification stating that any damage that may be caused by the members of the board of directors during the discharge of their duties is insured for an amount exceeding 25% of the company's capital	https://www.kap.org.tr/en/Bildirim/1370206
The name of the section on the corporate website that demonstrates current diversity policy targeting women directors	Diversity and Inclusion Policy under the Corporate Governance - Policies section of the Investor Relations website https://www.enerjisainvestorrelations.com/en/corporate-governance/policies/
The number and ratio of female directors within the Board of Directors	3 female directors - 37.5%

Composition of Board of Directors				
Name, Surname of Board Member	Whether Executive Director or Not	Whether Independent Director or Not	The First Election Date to Board	Link to PDP Notification that Includes the Independency Declaration
KIVANÇ ZAIMLER	Non-executive	Not independent director	01/07/2018	
ATTILA KISS	Non-executive	Not independent director	01/03/2024	
YEŞİM ÖZLALE ÖNEN	Non-executive	Not independent director	15/03/2023	
THORSTEN LOTT	Non-executive	Not independent director	01/01/2022	
NUSRET ORHUN KÖSTEM	Non-executive	Not independent director	01/04/2022	
GUNTRAM WÜRZBERG	Non-executive	Not independent director	01/04/2022	
MEHTAP ANIK ZORBOZAN	Non-executive	Independent director	29/03/2018	https://www.kap.org.tr/en/Bildirim/1267664
KAMURAN UÇAR	Non-executive	Independent director	01/04/2022	https://www.kap.org.tr/en/Bildirim/1015064

CORPORATE GOVERNANCE INFORMATION FORM

4. BOARD OF DIRECTORS-II	
4.4. Meeting Procedures of the Board of Directors	
Number of physical or electronic board meetings in the reporting period	5
Director average attendance rate at board meetings	95%
Whether the board uses an electronic portal to support its work or not	No
Number of minimum days ahead of the board meeting to provide information to directors, as per the board charter	7
The name of the section on the corporate website that demonstrates information about the board charte	Article 10 - Articles of Association (https://www.enerjisainvestorrelations.com/en/corporate/articles-of-association)
Number of maximum external commitments for board members as per the policy covering the number of external duties held by directors	N/A
4.5. Board Committees	
Page numbers or section names of the annual report where information about the board committees are presented	SECTION NAME: RISKS AND THE EVALUATION OF THE MANAGEMENT BODY/COMMITTEES
Link(s) to the PDP announcement(s) with the board committee charters	Under Committee Charter tab in Investor Relations website (https://www.enerjisainvestorrelations.com/en/corporate-governance/committee-charters), https://www.kap.org.tr/en/Bildirim/1004425 , https://www.kap.org.tr/en/Bildirim/1015065 , https://www.kap.org.tr/en/Bildirim/1072715

Composition of Board Committees-I				
Names of the Board Committees	Name of Committees Defined as "Other" in the First Column	Name-Surname of Committee Members	Whether Committee Chair or Not	Whether Board Member or Not
Audit Committee		Mehtap Anık Zorbozan	Yes	Board member
Audit Committee		Kamuran Uçar	No	Board member
Committee of Early Detection of Risk		Mehtap Anık Zorbozan	Yes	Board member
Committee of Early Detection of Risk		Kamuran Uçar	No	Board member
Committee of Early Detection of Risk		Nusret Orhun Köstem	No	Board member
Committee of Early Detection of Risk		Thorsten Lott	No	Board member
Corporate Governance Committee		Kamuran Uçar	Yes	Board member
Corporate Governance Committee		Guntram Würzberg	No	Board member
Corporate Governance Committee		Yeşim Özlale Önen	No	Board member
Corporate Governance Committee		Harun Turan	No	Not board member

4. BOARD OF DIRECTORS-III	
4.5. Board Committees-II	
Specify where the activities of the audit committee are presented in your annual report or website (Page number or section name in the annual report/website)	SECTION NAME: RISKS AND THE EVALUATION OF THE MANAGEMENT BODY/COMMITTEES
Specify where the activities of the corporate governance committee are presented in your annual report or website (Page number or section name in the annual report/website)	SECTION NAME: RISKS AND THE EVALUATION OF THE MANAGEMENT BODY/COMMITTEES
Specify where the activities of the nomination committee are presented in your annual report or website (Page number or section name in the annual report/website)	SECTION NAME: RISKS AND THE EVALUATION OF THE MANAGEMENT BODY/COMMITTEES
Specify where the activities of the early detection of risk committee are presented in your annual report or website (Page number or section name in the annual report/website)	SECTION NAME: RISKS AND THE EVALUATION OF THE MANAGEMENT BODY/COMMITTEES
Specify where the activities of the remuneration committee are presented in your annual report or website (Page number or section name in the annual report/website)	SECTION NAME: RISKS AND THE EVALUATION OF THE MANAGEMENT BODY/COMMITTEES
4.6. Financial Rights	
Specify where the operational and financial targets and their achievement are presented in your annual report (Page number or section name in the annual report)	SECTION NAME: COMPANY'S OPERATIONS AND RELATED MAJOR DEVELOPMENTS
Specify the section of website where remuneration policy for executive and non-executive directors are presented.	Remuneration Policy is Under Corporate Governance - Policies section of the Investor Relations website https://www.enerjisainvestorrelations.com/en/corporate-governance/policies/
Specify where the individual remuneration for board members and senior executives are presented in your annual report (Page number or section name in the annual report)	SECTION NAME: FINANCIAL RIGHTS GRANTED TO THE MEMBERS OF THE MANAGEMENT BODY AND THE SENIOR-LEVEL EXECUTIVE OFFICERS

Composition of Board Committees-II					
Names of the Board Committees	Name of Committees Defined as "Other" in the First Column	The Percentage of Non-executive Directors	The Percentage of Independent Directors in the Committee	The Number of Meetings Held in Person	The Number of Reports on Its Activities Submitted to the Board
Audit Committee		100%	100%	4	4
Committee of Early Detection of Risk		100%	50%	5	5
Corporate Governance Committee		75%	25%	4	4

ANNUAL GENERAL MEETING

2024 ORDINARY GENERAL MEETING OF SHAREHOLDERS

The Company will hold its Ordinary General Meeting of Shareholders on 24 March 2025 for the fiscal year 2024.

The invitations to the General Meeting of Shareholders are made by the Board of Directors in accordance with the Turkish Commercial Code, the Capital Markets Law and the Articles of Association of the Company. The meeting minutes were announced to the public on the Company website and the Public Disclosure Platform (KAP).

The decision to hold a General Meeting is announced to the public through the Public Disclosure Platform and the Electronic General Assembly System (E-GKS). General Assembly announcements are made in accordance with legal regulations at www.enerjisainvestorrelations.com 21 days before the General Assembly at the latest to address the highest possible number of shareholders

2024 DIVIDEND

Pursuant to the review of the audited Consolidated Financial Statements for the year 2024 prepared in accordance with the Turkish Financial Reporting Standards, Distribution of a cash dividend in an amount of TL 2.87 per TL 1 nominal share, with a payout ratio of 80.21% based on an underlying net income (net income excluding any exceptional items) of TL 4,225,991,691.35 will be proposed to general assembly.

ENERJISA ENERJİ A.Ş. AGENDA FOR THE 2024 ORDINARY GENERAL ASSEMBLY MEETING TO BE HELD ON MARCH 24, 2025, AT 11:00

- 1) Opening and formation of the Meeting Council,
- 2) Reading and discussion of the 2024 Activity Report of the Board of Directors,
- 3) Reading the 2024 Independent Auditor's Reports,
- 4) Reading, discussion and approval of the 2024 Financial Statements,
- 5) Release of the members of the Board of Directors with regard to the 2024 activities,
- 6) Discussion and approval of the amendment to be made on the Dividend Policy,
- 7) Determination of the usage of the 2024 profit, dividend and dividend per share to be distributed,
- 8) Determination of the salaries, attendance fees, bonus, premium and similar rights to be paid to the members of the Board of Directors,
- 9) Election of the auditor,
- 10) Approval of the granting authority to the Board of Directors to decide on the distribution of dividend advances for the fiscal year 2025 in compliance with the Company's Articles of Association and the Capital Markets Board's Communiqué II-19.1 on Dividend Distribution,
- 11) Informing the General Assembly regarding the donations and grants made by the Company in 2024,
- 12) Determination of an upper limit for donations to be made in 2025,
- 13) Granting permission to the members of the Board of Directors for the activities under the Articles 395 and 396 of the Turkish Commercial Code,
- 14) Wishes and requests.

LEGAL DEVELOPMENTS

INFORMATION ON THE MAIN DEVELOPMENTS DURING THE RELATED FISCAL PERIOD

Establishment of a Company in the Vehicle Rental Sector

As published in the Trade Registry Gazette, "Enerjisa Araç Filo Hizmetleri Anonim Şirketi," owned with 100% share, by Enerjisa Enerji A.Ş., has been established on May 14, 2024. Enerjisa Araç Filo Hizmetleri Anonim Şirketi will provide and develop all kinds of services and related activities in the operational vehicle rental sector, including fleet services for customers.

Energy Market Regulatory Board Decision to Revoke Board Decision

It has been decided that the Board Decision No. 11931-24 dated 22.06.2023 regarding the granting of a pre-license with storage based on solar energy source for the part of the application of Enerjisa Müşteri Çözümleri A.Ş., a subsidiary of our Company, which was approved by the Energy Market Regulatory Authority for a total power of 217MWp/155MWe and disclosed to the public with our Material Event Disclosure dated 10.08.2023, and which is planned to be established in Çankırı Province, Eldivan District with a power of 21MWp/15MWe, shall be revoked and the license application made by the Company with the number TLP-01339774 shall be rejected by EMRA.

The appeal process regarding the relevant revocation decision will be carried out and any important developments regarding the issue will be announced.

MAJOR LEGISLATIVE CHANGES IN THE DISTRIBUTION BUSINESS SEGMENT:

Eligible Consumer Limit: With the Energy Market Regulatory Board (hereinafter also referred to as "EMRA" or "Board") or decision dated 28.12.2023 and numbered 12295 published in the Official Gazette dated December 30, 2023 and numbered 32415, it was decided to apply the eligible consumer limit as 950 kWh for 2024 (The eligible consumer limit was set as 1000 kWh in 2023).

Elektrik Üretim A.Ş. Tariffs: The active electricity energy wholesale tariff applied to the sales made by EÜAŞ to distribution companies within the scope of technical and non-technical lost energy is determined by EMRA Board decisions in quarterly periods within the scope of Article 17 of the Electricity Market Law No. 6446, and with the EMRA Board Decision dated 17.08.2023 and numbered 12031 published in the Official Gazette dated 18.08.2023 and numbered 32283, it was decided to apply 100.0000 kr/kWh as of 18.08.2023. As of 18.08.2023, the active electricity energy wholesale tariff to be applied for sales made to distribution companies within the scope of general lighting has been determined as 380.0000 kr/kWh.

Electricity Tariffs: The Energy Market Regulatory Authority publishes the Final Tariff Table and the general lighting unit cost tariffs for consumers receiving energy (low voltage - single term) by the incumbent supply companies in quarterly periods, and the electricity tariff tables to be valid as of 01.01.2024 were determined by the EMRA Board Decision dated 28.12.2023 and numbered 12318 published in the Official Gazette dated December 30, 2023 and numbered 32415 2nd Repeated Edition. As of 01.01.2024, the General Lighting Unit Price is applied as 473.1539 kr/kWh.

The Energy Market Regulatory Authority's (EMRA) Board Decision No. 12719 dated 27.06.2024: In accordance with the Decision published in the Official Gazette dated 29.06.2024 and numbered 32587, effective as of 01.07.2024:

- For distribution system users by distribution companies,
- For non-eligible consumers (= Eligible Consumer Limit 2024: 950 kWh) and i) consumers who are eligible but have not selected their supplier, ii) low-consumption consumers as defined in the Communiqué on Regulating the Last Resort Supply Tariff by assigned supply companies,
- For consumers who have chosen the Green Tariff by the assigned supply company,

the tariff tables to be applied have been approved. The most recent amendment to the tariff tables was made by the Board Decision No. 12318 dated 28.12.2023, published in the Official Gazette No. 32415 (2nd Repeated Issue) on 30.12.2023, effective as of 01.01.2024.

Considering the final tariff tables effective as of 01.07.2024, the single-term general lighting tariff has increased by approximately 10% from 473.1539 kr/kWh to 522.7352 kr/kWh. The distribution fee for consumer tariffs based on activity type, covering the Industrial, Public and Private Services Sector, and Other, Residential, and Agricultural Activities subscriber groups, has increased by approximately 59%.

Cutting- Connecting Fee for the year 2024: The Board Decision dated 28.12.2023 and numbered 12302-2 published in the 2nd Repeated Official Gazette dated December 30, 2023 and numbered 32415 determined the cutting and connection fees to be valid as of 01.01.2024. TL 72.6 for Low Voltage (was TL 44.8 in 2023); TL 543.6 for Medium Voltage (was TL 335.6 in 2023).

Meter Control Fees for the year 2024: With the Board Decision dated 28.12.2023 and numbered 12302-3 published in the 2nd Repeated Official Gazette dated December 30, 2023 and numbered 32415, the meter control fees to be valid as of 01.01.2024 have been determined. The fee for directly connected single-phase active or three-phase active and/or reactive meters is TL 100.6 (it was TL 62.1 in 2023). For active and/or reactive meters with current transformer and/or voltage transformer, it is TL 127.5 (it was TL 78.7 in 2023).

Payment Notice and Second Notice Release Fees for the year 2024: With the Board Decision dated 28.12.2023 and numbered 12302-4 published in the 2nd Repeated Official Gazette dated December 30, 2023 and numbered 32415, as of 01.01.2024, the fees for the payment notification and second notification release services received by the authorized supply companies from the distribution companies have been determined as follows:

	Fee (TL/Transaction)	
	Low Voltage	Medium Voltage
Payment Notice Release Fee	0.215 (it was 0.133 in 2023)	2.15 (it was 1.33 in 2023)
Second Notification Fee	4.31 (it was 2.66 in 2023)	43.22 (it was 26.68 in 2023)
Fee To Be Applied in Case of Leaving a Second Notification Together with The Payment Notification	TL 0	

Network Operator Application Fee for the year 2024: With the Board Decision dated 28.12.2023 and numbered 12302-5 published in the 2nd Repeated Official Gazette dated 30 December 2023 and numbered 32415, the application fee to be collected by the grid operator pursuant to subparagraph (a) of paragraph 2 of Article 36 of the Unlicensed Electricity Generation Regulation, which will be valid as of 01.01.2024, has been determined as follows:

Power Range	Fee (TL/Year)
0-50 kW (Included)	0
50 – 250 kW (Included)	1,716.5
250 kW – 5 MW (Included)	3,433.0
Above 5 MW	6,865.9

Network Operator Annual Operating Fee for the year 2024: Pursuant to the Board Decision dated 28.12.2023 and numbered 12302-7 published in the 2nd Repeated Official Gazette dated 30 December 2023 and numbered 32415, the annual operating fee to be collected by the relevant network operator pursuant to subparagraph (b) of paragraph 2 of Article 36 of the Unlicensed Electricity Generation Regulation to be effective as of 01.01.2024 has been determined as follows:

Power Range	Fee (TL/Year)
0-50 kW (Included)	0
50-250 kW (Included)	4,800.3
250 kW – 5 MW (Included)	9,599.8
Above 5 MW	19,199.2

Transaction Fees for the year 2024: Pursuant to the Board Decision dated 28.12.2023 and numbered 12302-8 published in the 2nd Repeated Official Gazette dated 30 December 2023 and numbered 32415, the transaction fee to be collected by the relevant network operator and the responsible supply companies pursuant to subparagraph (c) of paragraph 2 of Article 36 of the Unlicensed Electricity Generation Regulation, which will be valid as of 01.01.2024, has been determined as follows:

Type of Transaction	Fee (TL)
Share Transfer	0
Other Transactions	2,183.7

LEGAL DEVELOPMENTS

Project Approval and Acceptance Fees to Solar Energy Based Generation Facilities with Roof and Facade Applications of 50 kW and Below for the year 2024:

With the Board Decision dated 28.12.2023 and numbered 12302-9 published in the 2nd Repeated Official Gazette dated December 30, 2023 and numbered 32415, the Project Approval and Acceptance Fee for Solar Energy Based Generation Facilities with Roof and Facade Application of 50 kW and Below, which will be valid as of 01.01.2024, has been determined as zero.

OSOS Additional Data Request Fee for the year 2024: Pursuant to the Board Decision dated 28.12.2023 and numbered

12302-10 published in the 2nd Repeated Official Gazette dated December 30, 2023 and numbered 32415 and Article 4 of the Board Decision numbered 6520, the fee to be charged in case additional data is requested within the scope of the Automatic Meter Reading System has been determined as TL 31.9 per meter/month as of 01.01.2024 (it was TL 19.7 in 2023).

Connection Fees for the year 2024: As of 01.01.2024 with the Board Decision dated 28.12.2023 and numbered 12302-11 published in the 2nd Repeated Official Gazette dated December 30, 2023 and numbered 32415, following was decided:

- Calculating the unit price by considering the length of each overhead and underground lines separately in case both overhead and underground cables are used in the connection line,
- When calculating the connection fee for lines above 100 kW, the price of 445.75 TL/meter up to 100 kW shall be calculated by adding the price calculated by multiplying each kW above 100 kW by 1.80 TL/m,
- Not to impose any charges under any other name other than TL/meter-based charges to the consumer receiving connection service.
- Taking the power in Article 3/1 of the Distribution Connection Agreement as the basis for the connection fee.

Fees for the year 2024	
Connection Fee	TL/meter
Low Voltage	
0-15 kW (Included)	
Underground	241.17
Overhead Line	112.12
15- 50 kW (Included)	
Underground	326.45
Overhead Line	190.28
50-100 kW (Included)	
Underground	445.77
Overhead Line	237.03
Above 100 kW	
Underground	445.77 + 1.80 x (Power-100)
Medium Voltage	
Underground	1139.63
Overhead Line	304.65

Project Approval and Acceptance Fees for Unlicensed Electricity Generation Facilities Based on Solar Energy for the year 2024: With the Board Decision dated 28.12.2023 and numbered 12302-12 published in the 2nd Repeated Official Gazette dated 30 December 2023 and numbered 32415, it has been decided that the fees for project approval and acceptance procedures to be carried out by electricity distribution companies for unlicensed solar energy-based electricity generation facilities will be applied as follows as of 01.01.2024:

Project Approval and Acceptance Fees for Unlicensed Electricity Generation ("GES") Facilities Based on Solar Energy			
Project Approval Fee of GES Facilities within the Scope of Unlicensed Electricity Generation Regulation ("LÜY")	Fee TL (Excluding VAT)	Acceptance Fees of GES Facilities within the Scope of Unlicensed Electricity Generation Regulation	Fee TL (Excluding VAT)
50 kWe and below Electrical Project Approval of GES Production Facilities within the scope of LÜY	0	Acceptance of 50 kWe and below GES Production Facilities within the scope of LÜY	0
50 kWe - 100 kWe (including 100 kWe) Electrical Project Approval of GES Production Facilities within the scope of LÜY	1120.9	50 kWe - 100 kWe (including 100 kWe) Acceptance Fee for GES Generation Facilities within the scope of LÜY	2133.1
100 kWe - 300 kWe (including 300 kWe) Electrical Project Approval of GES Generation Facilities within the Scope of LÜY	4265.9	100 kWe - 300 kWe (including 300 kWe) Acceptance Fee for GES Generation Facilities within the Scope of LÜY	6163.2
300 kWe - 500 kWe (including 500 kWe) Electrical Project Approval of GES Production Facilities within the Scope of LÜY	9126.9	300 kWe - 500 kWe (including 500 kWe) Acceptance Fee for GES Generation Facilities within the Scope of LÜY	9312.4
500 kWe - 700 kWe (including 700 kWe) Electrical Project Approval of GES Production Facilities within the Scope of LÜY	15052.3	500 kWe - 700 kWe (including 700 kWe) Acceptance Fee for GES Generation Facilities within the Scope of LÜY	16489.4
700 kWe - 1 MWe (excluding 1 MWe) Electrical Project Approval of GES Production Facilities within the Scope of LÜY	20755.8	700 kWe - 1 MWe (except 1 MWe) Acceptance Fee for GES Generation Facilities within the Scope of LÜY	20977.4
Electricity Project Approval for each MWe of GES Production Facilities above 1 MWe within the scope of LÜY; For GES production facilities above 1 MWe within the scope of LÜY, an additional project approval service fee of 50% of the service fee in the 700 kWe - 1 MWe index is charged for each MWe.	10378.9	Acceptance Fee for each MWe of SPP Production Facilities above 1 MWe within the scope of LÜY; For GES production facilities above 1 MWe within the scope of LÜY, an additional acceptance fee of 50% of the service fee in the 700 kWe - 1 MWe index is charged for each MWe.	10489.7

Technical Quality Measurement Service Fees for the year 2024: With the Board Decision dated 28.12.2023 and numbered 12302-12 published in the 2nd Repeated Official Gazette dated December 30, 2023 and numbered 32415, the technical quality measurement service fee has been determined as follows as of 01.01.2024.

Technical Quality Measurement Service Fees		
Instrument Class	Bedel (TL)	
	Low Voltage	Medium Voltage
S Class	328.0 (it was 202.5 in 2023)	865.2 (it was 540.3 in 2023)
A Class	504.7 (it was 311.6 in 2023)	1346.4 (it was 831.2 in 2023)

LEGAL DEVELOPMENTS

Amendment to the Procedures and Principles Regarding the Implementation of Distribution Activity Quality Factor for the 4th Tariff Implementation Period:

With the Board Decision dated 28.12.2023 and numbered 12296 published in the 2nd Repeated Official Gazette dated 30 December 2023 and numbered 32415, 'Procedures and Principles Amending the Procedures and Principles Regarding the Implementation of Distribution Activity Quality Factor for the 4th Tariff Implementation Period' was adopted. The same Procedures and Principles were amended by the Board Decision dated 22.02.2024 and numbered 12444 published in the Official Gazette dated 24 February 2024 and numbered 32470.

In summary, according to the principles set out in the Quality Regulation on Distribution and Retail Sales Activities in the Electricity Market, a punitive provision has been added that the average undistributed energy indicator score will be considered as -2.5 as of the 2nd year of the implementation period of the distribution companies that do not fulfil the obligation to fully and accurately record the Undistributed Energy Table (Table 3) and Average Undistributed Energy Indicator (Table 4) tables for the year 't-1' and to submit and report the tables and the data based on the formation of the records in these tables.

In case of inaccurate data in the calculation of the continuity of supply performance score, an 'inaccurate data coefficient' has been added as a penalization mechanism.

In the event that the data for the year 't-1' fulfils the obligation to provide accurate data, but in the data for any of the years 't-2', 't-3' and 't-4', it is determined that the obligation to provide accurate data at a level that will affect the supply continuity quality indicators and/or the distribution company's annual and/or long-term compensation payment obligation is violated, the supply continuity performance score will be given as-5.

In the event that 95% of the connection opinions are not formed within maximum 7 (seven) business days, the distribution company-specific performance indicator score will be taken into account gradually in a negative direction. A penalizing mechanism has been determined in the event that the data based on the scores for the calculation of the connection demand fulfilment index performance score are not submitted correctly.

A penalizing mechanism has been determined in case the data for the calculation of the Occupational Health and Safety Performance Score is not submitted correctly. The formulas for determining the performance score have been changed.

The implementation year of the parameters based on the legislative amendment is specific to the last two years (connection performance score) and the last 3 years (other performance scores) of the implementation period.

Due to the earthquakes on 6 February 2023, new metrics were determined for the performance score calculations (continuity of supply, occupational health and safety, technical quality, connection) between 06/02/2023 and 08/05/2023 with the Board Decision.

Change in Methodology for the Establishment of Distribution Assets by Users:

With the Board Decision dated 18.01.2024 and numbered 12357 published in the Official Gazette dated 24.01.2024 and numbered 32439, the calculation method of the approximate contractual cost of distribution assets in the 'Methodology for the Establishment of Distribution Assets by Users' ('Methodology') has been amended. The Methodology sets out the rules on the method of reimbursement of distribution assets constructed by the users under Article 21 of the Regulation on Connection and System Usage.

With the amendment, the price paid for the facilities with similar characteristics, which is taken as a basis in the calculation of the approximate cost of the asset to be paid to the user and which was realized in the previous year in accordance with the procurement procedures (provided that at least 3 tenders were made), will be equalized according to the December CPI index in the year of the tender (CPI Index for December at the end of the year of the tender / CPI Index for the month of the tender) and will be included in the calculation. Before the amendment, the lowest of the prices determined in the tenders held on different dates during the year was selected, but with the amendment, the prices determined in the tenders during the year are synchronized with the year-end CPI index.

Another calculation parameter, the value to be obtained by making a 20% discount from TEDAŞ (Region II unit prices updated with current year prices), has not been changed, and the lowest price between the reduced TEDAŞ unit prices and the tender unit prices described above will continue to be used in the payment.

Regulation Amending the General Lighting Regulation:

With the amendment published in the Official Gazette dated 02.03.2024 and entered into force as of 1.1.2024; the periods in the Provisional Article 7 of the General Lighting Regulation were postponed to a later date; The deadline set in the regulation for the general lighting meters to be included in the Automatic Meter Reading System ('AMRS') has been extended from 31.12.2023 to 31.12.2024; and the deadline in the provision regarding the non-payment of general lighting fees to distribution companies due to the fact that general lighting meters cannot be monitored instantly and/or online by TEDAŞ as of 1.1.2024 has been extended to 1.1.2025.

With the amendment made, the obstacle to receive general lighting payments from the budget determined in the provisional Article 6 of the Electricity Market Law, including the January / 2024 period, has been eliminated.

Regulations Regarding the Advance Payment Notifications specified in Article 132/Ç of the Electricity Market Balancing and Settlement Regulation:

In 2023, the Board Decision dated 09.02.2023 and numbered 11629, the Board Decision dated 04.05.2023 and numbered 11827, the Board Decision dated 11.05.2023 and numbered 11846, the Board Decision dated 22.06.2023 and numbered 11928, the Board Decision dated 28.09.2023 and numbered 12095, and the Board Decision dated 28.09.2023 and numbered 12095 which was cancelled to be applied until 31.12.2024; the Board Decision dated 28.09.2023 and numbered 12095 were taken in 2023 regarding the payment dates and interest applications of the amounts included in the advance payment notifications specified in Article 132/Ç of the DUY, which were obliged to be paid due to the earthquake that occurred on 6 February 2023.

In the decision of the Energy Market Regulatory Board dated 28.03.2024 and numbered 12532 published in the Official Gazette dated 29 March 2024 and numbered 32504; due to the continuing effects of the Kahramanmaraş-based earthquakes dated 6 February 2023, pursuant to Article 140 of the Electricity Market Balancing and Settlement Regulation (Regulation), until 30 September 2024;

In order for Akedaş Elektrik Dağıtım A.Ş., Dicle Elektrik Dağıtım A.Ş., Fırat Elektrik Dağıtım A.Ş., Toroslar Elektrik Dağıtım A.Ş. and the incumbent supply companies operating in the said distribution regions;

- The categories of the incumbent supply companies within the scope of subparagraphs (a), (b), (c) and (ç) of the second paragraph of Article 17 of the Regulation,
 - Supply companies in which Organized Industrial Zones are directly or indirectly shareholders,
- the amounts included in the advance payment notifications specified in the first paragraph of Article 132/Ç of the Regulation,

which are obliged to be paid for the related invoice period, shall be postponed until the invoice due date for the relevant invoice period, and default interest shall not be applied to the market operator and market participant during the period of postponement of advance payments. The decision enters into force on 1 April 2024.

The abovementioned date "September 30, 2024" is postponed to March 31, 2025 with the decision of the EMRA Board dated 26.09.2024 and numbered 12899, which was published in the Official Gazette dated September 28, 2024 and numbered 12899 and entered into force on October 1, 2024.

Determination of Interest Rates to be Applied in Rediscount and Advance Transactions: The Central Bank of the Republic of Turkey has changed the discount interest rates to be applied in rediscount transactions and the interest rates to be applied in advance transactions against bills with a maximum of 3 months to maturity on the dates and at the rates indicated below. The amendments entered into force on the date of publication.

Communiqué	Rediscount Rate (Annual - %)	Advance Rate (Annual - %)
Central Bank of the Republic of Turkey Communiqué published in the Official Gazette dated April 1, 2024 and numbered 32386	50.75%	51.75%

LEGAL DEVELOPMENTS

Consumption amounts specified in Articles 5 and 6 of the Communiqué on the Regulation of the Last Source Supply Tariff and the coefficient rate determined by the Board: With the Board Decision published in the Official Gazette dated October 28, 2023 and numbered 32353, the consumption amounts in Articles 5 and 6 of the Communiqué on the Regulation of the Last Source Supply Tariff and the coefficient determined by the Board were determined for 2024.

- The consumption amount specified in the third paragraph* of Article 5 of the Communiqué on the Regulation of the End-Source Supply Tariff is applied as 100 million kWh/year for residential and agricultural activities consumer groups and 1 million kWh/year for other consumer groups for 2024.

Consumer Group	Consumption Amount (kWh/year)	
	2023	2024
Household	100 million	100 million
Agricultural Activities	100 million	100 million
Public and Private Sector Services Sector and Other	1 million	1 million
Industry	1 million	1 million
Lighting	1 million	1 million

- The KBK in the fifth paragraph of Article 6 of the Communiqué on the Regulation of the End-Source Supply Tariff continued to be applied as 1.0938, as of January 1, 2024 (it was also applied as 1.0938 in 2023).

Tax Procedure Law General Communiqué (Sequence No: 554): In accordance with the Tax Procedural Law General Communiqué No. 554 published in the Official Gazette No. 32380 dated 25 November 2023 and paragraph (B) of Article 298 bis of the Tax Procedure Law No. 213, the revaluation rate is the average price increase rate in the Domestic Producer Price Index of the Turkish Statistical Institute in October of the year to be revalued (including October) compared to the same period of the previous year. This rate must be announced in the Official Gazette by the Ministry of Treasury and Finance. In accordance with this provision, the revaluation rate has been determined as 58.46% (fifty-eight point forty-six) for 2023. On the other hand, it has been notified that the previously published Communiqués on this subject are also in force.

Communiqué on Administrative Fines to be Imposed in 2024 Pursuant to Article 16 of the Electricity Market Law: With the Communiqué published in the Official Gazette dated December 27, 2023 and numbered 32412, the administrative fines regulated in Article 16 of the Electricity Market Law ("Law") were increased by 58.46%, which was determined as the revaluation rate for 2023, and redetermined as follows. The Communiqué entered into force on 01/01/2024.

RELEVANT ARTICLE	ADMINISTRATIVE FINES ANTICIPATED IN LAW (TL)	ADMINISTRATIVE FINES IMPLEMENTED IN 2023 (TL)	ADMINISTRATIVE FINES TO BE IMPLEMENTED IN 2024 (TL)
In cases of request for information or on-site inspection by the Board; if it is determined that the requested information is provided inaccurately, incompletely or misleadingly, or if no information is provided at all, or if the opportunity for on-site inspection is not provided, it shall be warned to provide accurate information or to provide the opportunity for inspection within fifteen days. The administrative fine to be imposed on those who continue to violate despite the written warning	500,000	3,607,749	5,716,839
Paragraph (a) of the First Paragraph of Article 16	500,000	3,607,749	5,716,839
In the event that it is determined that there is a violation of the Law, secondary legislation or license provisions, Board decisions and instructions, it shall be warned to eliminate the violation within thirty days or not to repeat it, depending on the nature of the violation, and the administrative fine to be imposed on those who continue or repeat the violations despite the written warning	500,000	3,607,749	5,716,839
Paragraph (b) of the First Paragraph of Article 16	500,000	3,607,749	5,716,839
Administrative fine to be imposed without the need for warning in case of violation of the provisions of the Law, secondary legislation or license in a way that cannot be corrected after the violation has been made	900,000	6,493,959	10,290,327
Paragraph (c) of the First Paragraph of Article 16	500,000	3,607,749	5,716,839
Administrative fine to be imposed in case of submitting untrue documents or misleading information about the conditions required for the issuance of a license, or failing to notify the Board of changes in license conditions that will affect the issuance of a license during the license application or license execution	500	2,864	4,538
Paragraph (ç) of the First Paragraph of Article 16	800,000	5,772,413	9,146,965
In case of violation of the prohibition of affiliate relationship during the license period, the affiliate relationship shall be warned to be corrected within thirty days. Administrative fine to be imposed on those who continue to violate despite the written warning	900,000	6,493,959	10,290,327
Paragraph (d) of the First Paragraph of Article 16	900,000	6,493,959	10,290,327
In the event that it is determined that there is activity outside the scope of the license in the market, it shall be warned to stop the out-of-scope activity or adverse activity within fifteen days. Administrative fines to be imposed on those who continue their violations despite the written warning	1,000,000	7,215,524	11,433,719
Paragraph (e) of the First Paragraph of Article 16	1,000,000	7,215,524	11,433,719
Except for the inspections of electricity distribution companies, a period of time is given for the elimination of deficiencies related to unlit, out-of-place luminaires and/or poles detected within the scope of general lighting. An administrative fine of five hundred Turkish liras shall be imposed by the Board for each pole or luminaire determined by the determination that the deficiencies are not eliminated within the specified periods, following the notification of the Ministry to the Board. The periods to be given for the elimination of the identified deficiencies and the principles of determining the deficiencies shall be determined by regulation. Administrative fines imposed pursuant to this Law shall be paid within one month following the notification. Eighth Paragraph of Article 16	500	2,864	4,538

LEGAL DEVELOPMENTS

Minimum Wage Determination

Commission Decision: With the Decision of the Ministry of Labor and Social Security dated 27.12.2023 and numbered 2023/2 published in the Official Gazette dated 30 December 2023 and numbered 32415, pursuant to Article 39 of the Labor Law No. 4857 and Article 522 of the Presidential Decree No. 1 on the Organization of the Presidency, it is decided;

- To determine a single minimum wage at the national level
- To determine the minimum wage of the worker for one day of normal work as: TL 666.75 between 01/01/2024 - 31.12.2024,
- To propose to redefine the scope of the support and the procedures and principles in order to maintain the minimum wage support as TL 700 from January to December 2024

by the Minimum Wage Determination Commission, which is responsible for determining the minimum wage of all kinds of workers working with an employment contract and whether or not covered by this Law.

Electricity Market Measurement Systems

Regulation: Regulation on Electricity Market Measurement Systems published on December 28, 2023 and entered into force on January 1, 2024 has following transition provisions:

- The user mobile application to be established by EPIAŞ (June 1, 2024) and the distribution company to provide data to this application as of July 1, 2024.
- (ii) National smart meter system ("MASS") transition period implementations (the distribution company shall install the central communication software by April 1, 2025; ensure integration for the transfer and processing of meter data by August 1, 2025; the meters to be supplied by the distribution company as of June 1, 2025 shall comply with the interoperability principle).

The National Smart Meter System (MASS) consists of the following hardware and software components, and these components should work in harmony without the need for any revision:

- Smart meters
- Modem
- Central communication software
- Data concentrator
- User mobile app

The duties and responsibilities of the distribution company regarding the Smart Meter System Infrastructure are as follows:

- Inclusion of meters connected to the distribution system in the scope of MASS (until 1/8/2025),
- Installation, operation and maintenance of the equipment, infrastructure and smart meters necessary for establishing communication; and
- Replacement of existing meters with smart meters.

The User Mobile Application to be established by EPIAŞ until 1/6/2024 is operated by EPIAŞ in order to enable users to view and analyse some of their information and is based on the principle that the distribution company is responsible for the accuracy of the data it will provide until 1/7/2024.

The following features will be available in the user mobile application:

- Ability to view daily, monthly, yearly consumption and/or production data (by time period)
- Ability to alert the user in case of unexpected overconsumption, consumption when not in use
- Informing the user even if the limit value set is exceeded
- Displaying the interruption list of the current and previous year interruption data affected by the users, the total interruption duration and total number of interruptions based on the continuity of supply compensation on a yearly basis, the start and end time of each interruption, the interruption duration, long-term and annual interruption compensation information
- Advance notification of notifiable outages
- Ability to view meter data related to technical quality events
- Reporting complaints and malfunctions

The procedures and principles regarding the sharing of data in the user mobile application with public institutions and organizations will be determined by the Authority.

Electricity meters are divided into 2 categories as Smart Meter EKO and Smart Meter PRO by the Regulation. According to the order of priority, the meters that should be within the scope of Smart Meter EKO are determined as follows:

- Newly installed meters and meters that need to be replaced due to expiration of the stamp period.
- Meters that must be installed at the output of each distribution transformer.
- Meters that need to be replaced due to malfunction.
- Meters replaced due to suspicion of illegal electricity use.

The meters that should be within the scope of Smart Meter PRO are determined as follows:

- Meters that measure the electricity drawn from the distribution system by the consumption units of licensed generation facilities.
- Meters that measure the electrical energy supplied by licensed generation facilities to the distribution system.
- Meters that measure the electrical energy exchanged between two distribution systems.
- Meters that measure the electrical energy supplied and withdrawn from the electricity storage unit within the electricity storage facility with storage, the electricity storage unit integrated to the generation facility and the stand-alone electricity storage facilities.
- Existing meters for places of use whose consumption in the previous year or consumption during the year is over 10 MWh.
- Meters to be used for measuring the electricity consumption of charging stations with a separate electricity subscription and at least one DC 50 kW and above charging unit and charging stations with an annual consumption of over 10 MWh.
- Unlicensed generation facilities with an installed capacity of over 10 kW.

Distribution companies shall record the data related to continuity of supply on the meters in such a way that there will be no data loss within the framework of the procedures defined in the Quality Regulation on Distribution and Retail Sales Activities in the Electricity Market and the procedures defined in the Procedures and Principles Regarding the Technical Quality of the Electricity Distribution System.

For meters that are not within the scope of remote communication, interruption and technical quality records on the meter will be read at least every 6 months by electricity distribution companies and recorded in their related systems.

The Procedures and Principles on the Scope of Automatic Meter Reading Systems and Determination of Meter Values and the Communiqué on Meters to be Used in the Electricity Market have been repealed.

The dates foreseen for the MASS Transition Period are as follows:

- Meters purchased according to TEDAŞ - MLZ/2017-062.A coded Electronic Electricity Meters Technical Specification can be installed until 1/1/2025.
- Communication units purchased according to TEDAŞ - MLZ/2019-064.A coded Communication Unit Technical Specification can be installed until 1/1/2025.
- Meters and modems compatible with the Automatic Meter Reading System can be installed until 1/1/2025 in places where Smart Meter PRO must be installed.
- Existing meters in the places of use with previous year consumption or consumption over 10 MWh within the year shall be replaced with Smart Meter PRO or Automatic Meter Reading System compatible meters and modems until 1/1/2025, starting with the ones with high consumption and not less than twenty percent on distribution company basis.

The Regulation Amending the Electricity Market Measurement Systems Regulation:

With the Regulation Amending the Electricity Market Measurement Systems Regulation published in the Official Gazette dated 7 June 2024 and numbered 32569, and dated 25.09.2024 numbered 32673 Official Gazette the periods set for the establishment of the "User Mobile Application" by EPIAŞ and the submission of data by distribution companies in the provisional article 2 of the Electricity Market Measurement Systems Regulation published in the Official Gazette dated 28/12/2023 and numbered 32413 have been changed prospectively.

- The User Mobile Application shall be established by EPIAŞ until 1/9/2024 (Before the amendment, this period was determined as 1/6/2024). It is operated by EPIAŞ in order to enable users to view and analyse some of their information and is based on the principle that the distribution company is responsible for the accuracy of the data that it will provide until 1/10/2024 (Before the amendment, this period was determined as 1/7/2024).
- The User Mobile Application shall be established by EPIAŞ by 1/3/2025. (Previously, this deadline was set as 1/6/2024 before the change and later as 1/9/2024.) It will be operated by EPIAŞ to enable users to view and analyse certain information. The distribution company will be responsible for ensuring the accuracy of the data it provides by 1/4/2025 (Previously, this deadline was set as 1/7/2024 before the change and later as 1/10/2024).

Regulation Amending the Regulation on Unlicensed Electricity Generation in the Electricity Market: With the Amendment Regulation published in the Official Gazette dated 14.05.2024 and numbered 32546, the following regulations have been made in the Unlicensed Electricity Generation Regulation:

Temporary subscriptions

- Except for temporary subscriptions of consumption facilities under construction, no generation facility can be established by real or legal persons within the scope of this Regulation for consumption facilities within the scope of temporary connection. However, the consumptions within the scope of temporary subscriptions may be included in the offsetting with the operating generation facilities belonging to the same real or legal person and located in the same subscriber group.

Connection agreement application

- It has been regulated that those who have been notified of the letter of invitation to the connection agreement will be given a period of one year from the date of notification of the letter of invitation to the connection agreement. (Previously, the period was 180 days). The one-year period is also applied for the existing letters of invitation to the connection agreement in terms of their remaining duration. However, if this period is less than one hundred and eighty days, the remaining period is applied as one hundred and eighty days.
- It is obligatory for the holders of the invitation letter to the connection agreement to have the generation facility and the connection line project, if any, approved by the Ministry or the institutions and/or legal entities authorised by the Ministry within the said period.
- It has been regulated that the mechanical installed capacity increase requested for generation facilities that are entitled to receive an invitation letter for the connection agreement before 12/5/2019 cannot exceed twenty percent of the electrical installed capacity; the mechanical installed capacity requested for generation facilities that are entitled to receive an invitation letter for the connection agreement after 12/5/2019 cannot exceed twice the electrical installed capacity.

LEGAL DEVELOPMENTS

Partial provisional acceptance and obtaining environmental impact assessment and zoning permits / Failure to sign the system usage agreement

- Partial acceptance can be made not less than 10 MWe each time. However, if the power other than the accepted part is not accepted within the period, the connection agreement is updated based on the accepted part.
- It is obligatory to be completed acceptance procedures for the ones which environmental impact assessment, zoning and other permits and approvals got as of the date of signature of the connection agreement,
 - o For all generation facilities using the distribution transformer of the relevant grid operator within one year,
 - o Not using the distribution transformer of the relevant network operator,
 - For generation facilities based on hydraulic resources within three years,
 - For generation facilities based on other resources within two years.

In the case that the system usage agreement is not signed by the parties within one month following the date when the facility commences commercial activity in the generation facilities whose acceptance is completed and commissioned, the energy generated by the relevant grid operator until the disconnection of the generation facility from the grid is deemed to have been generated and given to the system by the incumbent supply company and taken into consideration as a free contribution to Support Mechanism for Renewable Energy Sources. The system usage fee to be incurred for the amount of energy considered as free contribution to Support Mechanism for Renewable Energy Sources is paid to the relevant grid operator through the incumbent supply company and no invoice is notified to the unlicensed generation facility owners for the energy considered as free contribution to Support Mechanism for Renewable Energy Sources.

Law No. 7551 on Amendments to the Mining Law and Certain Laws: Law No. 7501 on Amendments to the Mining Law and Certain Laws published in the Official Gazette dated 11 May 2024 and numbered 32543 is as follows:

- The following paragraph was added to Article 9 titled 'Distribution activities' of the Electricity Market Law No. 6446 "(16) In places where a state of emergency is declared or considered as a disaster zone affecting general life, temporary electricity energy demands may be met within the framework of the procedures and principles determined by the Board decision in order to ensure uninterrupted electricity services."

In the recital of the article, it is stated that, considering that our country is located on the earthquake zone to a large extent, in order to ensure the uninterrupted delivery of electrical energy to the users, it is aimed not to seek the occupancy permit and other information and documents required by the legislation for electrical energy requests, if the existing electricity distribution network is sufficient for temporary connection requests in places that are accepted as a state of emergency decision or a disaster zone affecting general life. In addition, it is stated that it is aimed to provide electrical energy immediately to the new places of use of persons whose buildings have been destroyed or whose buildings have become unusable after disasters such as earthquakes and floods, and to temporarily not to request the information and documents required under the legislation, but to complete the aforementioned obligations later.

Presidential Decree No. 8485: By the Presidential Decree No. 8485 published in the Official Gazette dated 21 May 2024 and numbered 32552, it has been decided that the legal interest rate set forth in Article 1 of the Law No. 3095 on

Legal Interest and Default Interest shall be applied as 24% per annum effective from 1/6/2024 in accordance with Article 1 of the aforementioned Law. The legal interest rate had been applied as 9% per annum since 1 January 2006.

Presidential Decree No. 8484: By the Presidential Decree No. 8484 published in the Official Gazette No. 32552 dated 21 May 2024 and numbered 32552, it has been decided that the default interest rate in the first paragraph of Article 51 of the Law No. 6183 on the Procedure for Collection of Public Receivables shall be determined as 4.5% to be applied separately for each month in accordance with the aforementioned article of the Law No. 6183. The default interest rate had been applied as 3.5% for each month since 14.11.2023.

Constitutional Court Decision on Electricity Market Law: With the Constitutional Court Decision dated 7.12.2023, numbered 2018/117 and Decision numbered 2023/212, published in the Official Gazette dated 4 June 2024 and numbered 32566, and the Decree Law on Amendments to Certain Laws and Decree Laws in Order to Comply with the Amendments Made to the Constitution numbered 703, and the Electricity Market Law numbered 6446, titled "EÜAŞ's rights and obligations," were unanimously decided to enter into force twelve months after the decision was published in the Official Gazette, on the grounds that it cannot be regulated by a Statutory Decree. The issues that were annulled regarding distribution companies are as follows:

- EÜAŞ sells electrical energy to authorized supply companies at the wholesale tariff for consumers whose tariffs are subject to regulation.
- Distribution companies procure their energy needs for general lighting and technical and non-technical losses from EÜAŞ.

The Regulation Amending the Electricity Market Connection and System Utilisation Regulation: With the Regulation Amending the Electricity Market Connection and System Usage Regulation published in the Official Gazette dated 25 June 2024 and numbered 32583, the phrase 'two' in the second paragraph of Article 25 titled 'Payment Procedure' of the Electricity Market Connection and System Usage Regulation published in the Official Gazette dated 28/1/2014 and numbered 28896 has been amended as '1,3'. The Regulation enters into force on the date of publication.

'(2) The user pays the amount stated in the notification to TEİAŞ or the distribution company within fifteen days following the day on which the payment notification is notified. For the period of delay in payment, the default increase calculated according to Article 51 of the Law on Procedure for Collection of Public Receivables dated 21/7/1953 and numbered 6183 shall be applied. This rate is applied as two* 1,3 times for transmission system users.'

**This rate was determined as two times with the Regulation Amending the Electricity Market Connection and System Usage Regulation published in the Official Gazette dated 29 July 2023 and numbered 32263.*

National Artificial Intelligence Strategy 2024-2025 Action Plan: The Presidential Circular No. 2021/18 regarding the "National Artificial Intelligence Strategy 2021-2025," prepared in cooperation with the Presidential Digital Transformation Office and the Ministry of Industry and Technology and with the active participation of all relevant stakeholders, was published in the Official Gazette No. 31574 dated 20/08/2021 and entered into force on the same date. The Action Plan for the 2021-2025 period has been updated as the 2024-2025 Action Plan, taking into account the recent developments in the field of Artificial Intelligence and the needs of the country, in line with the 12th Development Plan.

On July 24, 2024, it was announced that the National Artificial Intelligence Strategy 2024-2025 Action Plan was published on the Presidential Digital Transformation Office website.

The Strategy was designed around the following 6 strategic priorities with the vision "producing value on a global scale with an agile and sustainable artificial intelligence ecosystem for a prosperous Türkiye." Also 24 objectives and 119 measures were determined within the scope of these strategic priorities.

1. Training AI Experts and Increasing Employment in the Field
2. Supporting Research, Entrepreneurship and Innovation
3. Expanding Access to Quality Data and Technical Infrastructure
4. Making Regulations to Accelerate Socioeconomic Adaptation
5. Strengthening International Collaborations
6. Accelerating Structural and Workforce Transformation

Presidential Circular No. 2024/9 on Türkiye's International Direct Investment Strategy (2024-2028): The important headings specified in the Circular No. 2024/9 on "Türkiye International Direct Investment Strategy (2024-2028)" published in the Official Gazette dated July 29, 2024 and numbered 32616 are as follows:

- International direct investments, which play an important role in the economic growth and development of our country, are complementary elements of industrial, trade and fiscal policies, and Türkiye, which continuously improves the investment environment through dynamic reform processes, has become one of the countries that attracts the highest number of investments in its region by offering an attractive investment environment to international investors,
- In the new period, Türkiye's role as a production and distribution base in its region is expected to strengthen,

- The "Türkiye International Direct Investment Strategy (2024-2028)" prepared under the coordination of the Investment Office of the Presidency of the Republic of Türkiye in line with all national policy documents, especially the 12th Development Plan (2024-2028), and by analysing the opportunities offered to investors, will be published at www.invest.gov.tr,
- The Strategy Document, which supports green and digital transformation, will be monitored by the Coordination Board for the Improvement of the Investment Environment,
- All public institutions and organizations within the scope of the Strategy should fulfil their duties and responsibilities with sensitivity.

National Cyber Security Strategy and Action Plan (2024-2028): With the Action Plan published in the Official Gazette dated 7 September 2024 and numbered 32655, it was stated that the intensive use of information and communication technologies in all sectors such as communication, transportation, energy, banking, finance and health, and the key role it plays in sustainable growth and development have made cyber security an integral part of national security. It has been reported that the "National Cyber Security Strategy and Action Plan (2024 2028)," which determines the goals, strategies and actions of the upcoming period in order to further improve the leading position of our country in the field of cyber security and the gains achieved in the studies carried out so far, has been prepared in cooperation with the public, private sector, non-governmental organizations and universities under the coordination of the Ministry of Transport and Infrastructure.

The National Cyber Security Strategy (2024-2028) will be published on the official website of the Ministry of Transport and Infrastructure (www.uab.gov.tr) and the National Cyber Security Action Plan (2024-2028), which was prepared in line with the aforementioned Strategy, will be shared with the institutions that are responsible for the activities determined and will cooperate in the realization of these activities.

LEGAL DEVELOPMENTS

The Medium-Term Program (2025-2027):

The Medium-Term Program, approved by the Presidential Decree No. 8906 published in the Official Gazette No. 32653 dated September 5, 2024, has been published on the official website of the Presidency of Strategy and Budget. The highlights of the Program are as follows:

Accelerating green transformation:

By implementing policies to accelerate the green transformation process for sustainable growth, compliance with international regulations will be strengthened, and the use of renewable energy resources and energy efficiency will be increased.

- Preparations for a legislation addressing climate change related practices in a holistic manner will be finalized and put into practice.
- Preparatory work for the Second Nationally Determined Contribution (NDC), which includes greenhouse gas emission mitigation and climate change adaptation targets and commitments, and the 2053 Long Term Climate Change Strategy will be finalized.
- A carbon pricing mechanism, that aims to reduce greenhouse gas emissions, will be established to maintain competitiveness during the green transformation process, minimize the impacts of Carbon Border Adjustment Mechanism (CBAM), and support the transition to a low-carbon economy.
- The impacts of the European Green Deal (EGD) and CBAM on various sectors will be assessed, and low-carbon sectoral roadmaps will be finalized for sectors that will be affected by EU regulations.
- To promote electric vehicles, charging station network will be improved and the use of domestic electric vehicles will be encouraged.
- Taxes that qualify as carbon taxes will be reviewed. The economic and social impacts of carbon pricing instruments, including a complementary carbon tax, on the development and investment environment will be analysed.

Supporting the transition to digital transformation:

By accelerating the digital transformation process and supporting the capacity and capabilities of companies, especially SMEs, in adopting digital technologies, the sustainability of growth will be ensured.

- Necessary legal regulatory work will be conducted to harmonize regulations with the European Union Artificial Intelligence Act.
- A dedicated legal regulation regarding cybersecurity, as well as the necessary secondary regulations, will be made in compliance with EU acquis.
- A Cybersecurity Strategy and Action Plan will be prepared and implemented.
- A national policy framework, including data ownership, data sharing responsibilities, and technical methods, will be prepared to accelerate the transition to the data economy. The data governance legal framework and governance infrastructure will be established in line with this policy framework.
- A National Data Strategy and Action Plan will be prepared and implemented.

New generation working styles and sectoral transformations under the heading of employment:

Labor market reforms will be implemented to increase employment and skill matching while ensuring balanced and employment-supporting growth.

- In line with new generation working models such as remote, part-time and temporary work and platform work, it is aimed to make regulations that take into account the needs of the labor market, equal opportunities for women and men and work-life balance.
- Amendments to the Labor Law and secondary legislation are planned.
- Analysing the reflections of green and digital transformation on labor markets were shared as topics.

Regulation on the Procedures and Principles Regarding the Transfer of Personal Data Abroad:

The regulation, which was published in the Official Gazette on July 10, 2024, and entered into force on the same day, is summarized below.

- **The transfer of personal data abroad** is defined as "the transfer of personal data within the scope of Law No. 6698 ('the Law') by a data controller or data processor to a data controller or data processor abroad, or making it accessible to them in another way."
- **Data Transferor:** The data controller or data processor who transfers personal data abroad.
- **Data Recipient:** The data controller or data processor abroad who receives personal data from the data transferor.

In cases where the conditions specified in Articles 5 and 6 of the Law regarding the processing of personal data and special categories of personal data are met, the data controller or data processor may transfer personal data abroad based on the following conditions:

- 1. Adequacy Decision:** Personal data can be transferred abroad upon the adequacy decision of the Personal Data Protection Board (for countries, sectors, or international organizations). The Board considers other conditions as well as reciprocity as stipulated in the Personal Data Protection Law and may set preconditions. The adequacy decision is reassessed every four years. The Board may review its decision at any time without being bound by the four-year period.
- 2. Transfer Based on Appropriate Safeguards:** If one of the data processing conditions set forth in the Law (Articles 5 and 6) exists, and provided that the data subject has the opportunity to exercise their rights and access effective legal remedies in the country of destination, the data can be transferred abroad if one of the following appropriate safeguards is provided by the transferor:
 - Existence of a non-international agreement (to be made between public institutions and organizations in Turkey and public institutions and organizations or international organizations abroad) and the Board's approval.

- Binding corporate rules (for companies within a group of undertakings engaged in joint economic activities).
- Existence of a standard contract (announced by the Board. No modifications can be made. The Turkish version is the original text. It is signed by the parties to the transfer. It must be physically submitted to the Institution or notified via a registered email address (KEP) or other methods determined by the Board within 5 business days after signatures are completed. If modifications are made to the standard contract announced by the Board, or if the standard contract does not have valid signatures from one or both parties, the Board will conduct an investigation in accordance with the provision regulating sanctions).
- A written commitment approved by the Board (to be executed between the parties to the transfer).

- 3. Incidental Transfers:** If the above conditions are not met, personal data may be transferred abroad only if one of the exceptional transfer cases listed below is present. Transfers that are irregular, occur once or a few times, are not continuous, and are not part of the regular flow of business activities are considered incidental.

- The data subject's explicit consent to the transfer after being informed about potential risks.
- The transfer is necessary for the performance of a contract between the data subject and the data controller or for taking pre-contractual measures at the request of the data subject.
- The transfer is necessary for the establishment or performance of a contract made for the benefit of the data subject between the data controller and another natural or legal person.
- The transfer is necessary for a superior public interest.

- The transfer is necessary for the establishment, exercise, or protection of a right.
- The transfer is necessary for the protection of the life or physical integrity of the data subject or another person who is unable to express their consent due to actual impossibility or whose consent cannot be legally recognized.
- The transfer is made from a publicly available registry to which access is granted under the relevant legislation, provided that the conditions required for accessing the registry are met and the transfer is requested by a person with a legitimate interest.

Public Announcement Regarding Standard Contracts and Binding Corporate Rules by the Personal Data Protection Authority:

In Article 9, titled "Transfer of personal data abroad" of Law No. 6698 on the Protection of Personal Data, an amendment was made by Article 34 of the Law on Amendments to the Code of Criminal Procedure and Certain Laws No. 7499. Within the scope of the amendment, "standard contracts" and "binding corporate rules" are envisaged as methods that data controllers and data processors can apply to ensure appropriate safeguards for the transfer of personal data abroad.

With the decision of the Personal Data Protection Board dated 4/6/2024 and numbered 2024/959, it was decided to approve the standard contract texts to be used for the transfer of personal data abroad, the application forms for binding corporate rules, and the guidance documents containing the fundamental issues that must be included in the binding corporate rules.

Decision of the Public Oversight, Accounting, and Auditing Standards Board dated 2/9/2024 and numbered 75935942-050.01.04- [01/25684]:

Subject: Board Decision on the Mandatory Assurance Audits for Sustainability Reports With the Decision published in the Official

Gazette dated September 5, 2024, and numbered 32653, a regulation was made regarding the mandatory assurance audits for sustainability reports.

- It was stated that sustainability reports prepared in accordance with the Turkish Sustainability Reporting Standards will be subject to assurance audits starting from the first year of their preparation, for accounting periods starting on or after 01/01/2024.
- With the amendment made in Article 84(a) of TSRS 1 General Provisions on the Disclosure of Sustainability-Related Financial Information, the expression "financial reports" has been updated to "sustainability-related financial disclosures."

Regulation on Fluorinated Greenhouse Gases: Published in the Official Gazette dated October 15, 2024, the Regulation, which entered into force on the date of its publication except for some articles, aims to regulate the procedures and principles regarding the management of fluorinated greenhouse gases and other fluorinated substances in order to control the emission of fluorinated greenhouse gases within the scope of the Montreal Protocol on Substances that Deplete the Ozone Layer, to which Türkiye is a party. The Regulation covers the following matters:

- Principles on the labelling, data collection, leakage controls, reporting, placing on the market, import, export and use, quota distribution, recovery, recycling, reclamation and disposal of fluorinated greenhouse gases and other fluorinated substances, including those in products and equipment,
- Issues and regulations on the training and certification of natural and legal persons who intervene in equipment containing fluorinated greenhouse gases or whose operation relies on these gases.



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Article 5 of the Regulation titled "Definitions" contains the following definitions:

Electrical switchgear: Switching, measuring, protection and electrical energy conversion devices intended for use in connection with the generation, transmission, distribution and conversion of electrical energy, and the interconnection, equipment and supporting structures of these tools and equipment,

Amount of fluorinated greenhouse gases in electrical switchgear: The amount of fluorinated greenhouse gases in a single compartment or any other part of electrical switchgear equipment that is separated from other parts,

Database of Activity Reports (FARAVET): Electronic database containing annual reports submitted by enterprises importing, exporting or using, distributing, recovering, recycling, reclaiming, reclaiming or disposing of fluorinated greenhouse gases or other fluorinated substances in products or equipment or in bulk, quota allocation and license module,

Fluorinated greenhouse gases: Hydrofluorocarbons, perfluorocarbons, sulphur hexafluoride or mixtures containing at least one of these substances or other fluorinated greenhouse gases listed in Annex 1,

Central Database of Equipment Operators (EKOMVET): The electronic database containing the logbooks of the equipment specified in the first paragraph of Article 7,

Electrical switchgear containing 6 kg or more of fluorinated greenhouse gases in a single compartment or in any part separated from other parts shall be entered into EKOMVET by natural and legal persons who are the operators. (Art. 7)

Electrical switchgear equipment shall be labelled in accordance with the procedures and principles set out in the Regulation on Classification, Labelling and Packaging of Substances and Mixtures published in the Official Gazette dated 11/12/2013 and bis numbered 28848 (Art. 11)

Electrical switchgear equipment containing 6 kg or more of fluorinated greenhouse gases in a single compartment or in any part separated from other parts must be subject to equipment leakage checks every 6 years. (Art. 12) If the tested leakage rate of electrical switchgear equipment is less than 0.1% per year and labelled by the manufacturer with the statement "the tested leakage rate is less than 0.1% per year" or if it has pressure or density monitoring equipment or if it contains less than 6 kilograms of fluorinated greenhouse gases, it is not subject to leakage control.

The natural person who performs the installation, commissioning, maintenance or technical service or decommissioning of electrical switchgear equipment must have a Vocational Qualification Certificate for performing these activities (Art. 16). The natural person who recovers fluorinated greenhouse gases from electrical switchgear equipment, recycling and/or reclamation of these fluorinated greenhouse gases must have a Vocational Qualification Certificate for performing this activity.

Communiqué Amending the General Communiqué on Tax Procedure Law (Sequence No: 459) (Sequence No: 572): Communiqué published in the Official Gazette dated 18.10.2024 and numbered 32696 amended the General Communiqué on Tax Procedure Law (Serial No: 459).

With the amendment, non-taxpayers are obliged to make their collections and payments exceeding TRY 7,000 for their purchases from those who are within the scope of the obligation to certify in accordance with the Communiqué through intermediary financial institutions.

Law dated 24.10.202 and numbered 7529 on the Amendment of the Law on the Protection of Consumers and Certain Laws: The Law Amending the Law on the Protection of Consumers and Certain Laws was published in the Official Gazette dated 30.10.2024 and numbered 32707. The "direct sales" provisions in Articles 5, 6 and 7 of the Law will enter into force on July 30, 2025; the subparagraph added to paragraph A of the repeated Article 298 of the Tax Procedure Law, which regulates the inflation adjustment in the "construction in progress"

account, will enter into force on 01.01.2024 (the date of the beginning of the special accounting period in 2024 for taxpayers who have designated a special accounting period), and the other provisions will enter into force on the date of publication of the Law.

The important amendments are as follows:

1. Subparagraph A of repeated Article 298 of the Tax Procedure Law (Effective Date 01.01.2024) (Art. 12)

- **Inflation Adjustment Differences:** Inflation adjustment differences in the construction in progress account will be monitored in a special fund account in the liabilities of the balance sheet and these amounts will not be taken into account in determining the period earnings.
- **Inclusion Process:** When the investment is completed and capitalized, it will be included in the income for the period in equal instalments for four years over the related economic asset.
- **Revaluation Rate:** These amounts, which are monitored in the special fund account and are not taken into account in determining the period earnings, will be increased by the revaluation rate every year, but will not be subject to inflation adjustment again.
- **Conditions for Not Benefiting from the Right:** In cases such as quitting the business during the investment period or transferring the amounts in the fund account to another account, the portion of these funds not included in the earnings will be added to the corporate income of that period.

Public Oversight Accounting and Auditing Standards Authority Board Decision [75935942-050.01.04-[01/26802]:

With the decision published in the Official Gazette dated 26.10.2024 and numbered 32704, it has been decided that the entities applying the Turkish Financial Reporting Standards or the Financial Reporting Standard for Large and Medium-Sized Enterprises shall present additional footnote disclosures in the financial statements regarding the Net Monetary Position Gains (Losses) item arising from the inflation adjustment of the financial statements and reported in the statement of profit or loss.

V. Implementation Period: With the Electricity Market Board Decision dated 07.11.2024 and numbered 12987 published in the Official Gazette dated 09.11.2024 and numbered 32717, the fifth implementation period in which the parameters based on the income / tariff regulations of the distribution companies and authorized supply companies operating in the electricity market will be valid has been determined as 01/01/2026 (included) - 31/12/2030 (included).

Communiqué Amending the Communiqué on the Regulation of the End-Source Supply Tariff:

1. End-source supply tariff for high consumption consumers (Art. 6 f.3) (Effective Date: 1.1.2025)

The end-source supply tariff for high consumption consumers cannot be lower than the approved retail tariff for non-eligible consumers. With the amendment, it is clearly stated that the "single-time" retail tariff will be accepted as the measure. As of January 1, 2022, since the "tiered tariff*" has been determined, it is stipulated that the end-source supply tariff for high-consumption consumers will be determined based on the higher of the tiered tariff.

*Tiered tariff
Residential (LV): 8 kWh(per day)
Public Private Services Sector and Other (LV) : 30 kWh (per day)

2. Renewable Energy Resources Support Mechanism ("YEKDEM") calculation used in the calculation of the end-source supply tariff for high consumption consumers (Art. 6 f. 6) (Effective Date: 16.11.2024)

$$YEKDEM_d = \frac{\sum_{i=1}^n g_i \times YEKDEM_i}{\sum_{i=1}^n g_i}$$

YEKDEMi YEKDEM unit price estimated by the Board,

gi denotes the application of a cap.

n d number of calendar months included in the invoice period.

Prior to the amendment of the Communiqué, the YEKDEM price determined by EPIAŞ was taken into consideration, whereas with the new Communiqué, the Board will stipulate the YEKDEM price and a cap will be calculated according to the changes in the relevant month(s).

3. Predicted and realized FIT Difference (Art. 6 f. 7) (Effective Date: 16.11.2024)

Differences arising from the foreseen and realized YEKDEM price shall be taken into account in the tariff arrangements of the end-source supplier.

4. Procedure for Informing on the End-Source Supply Tariff (Art. 8 f. 3) (Effective Date: 16.11.2024)

Consumers included in the high-consumption consumer group will be informed by distribution and authorized supply companies via permanent data storage or in writing. Prior to the amendment, notification was required to be made via text message or e-mail.

Consumer Group	Consumption Amount (kWh/year)
Residential	100 million
Agricultural Activities	100 million
Public and Private Services Sector and Other	1 million
Industry	1 million
Lighting	1 million

5. Collusion in the Implementation of the High Consumption Consumer Group (Art. 8 f. 5) (Effective Date: 16.11.2024)

The energy consumed by the consumer at a place of use pursuant to a contract concluded on his/her behalf is taken into account when determining the status of being included in the high consumption consumer group. With the amendment made, it has been regulated that in consumer or consumer group changes affecting the end-source supply, license holder legal entities are authorized to request the necessary information and documents in order to prevent collusive transactions.

End Source Supply Tariff - 07.11. 2024 - Energy Market Regulatory Authority Decision No. 12989: Pursuant to the third paragraph* of Article 5 of the Communiqué on the Regulation of the Last Source Supply Tariff, the consumption amounts determined for the year 2024 (with the Board Decision dated 26.10.2023 and numbered 12158) will continue to be applied until 31.01.2025.

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As of 01.02.2025, the following consumption amounts will be applied for the year 2025:

Consumer Group		Consumption Amount (kWh/year)
Residential	Dwelling Public institutions and organizations, local administrations and detached buildings used as dwellings, apartment buildings and independent sections within apartment buildings, housing cooperatives and housing estates and common areas of these places such as heating, elevator, hydrophore, staircase automatics, caretaker's apartment, etc., which are measured with separate meters, and other 5 thousand	5 thousand
	Temporary accommodation centres established by the Republic of Turkey Ministry of Interior AFAD, facilities used for the supply and distribution of drinking water belonging to village legal entities 100 million	100 million
Agricultural Activities		100 million
Public and Private Services Sector and Other		15 thousand
Industry		15 thousand
Lighting		15 thousand

2024 Revaluation Rate: With the Tax Procedure Law General Communiqué (Sequence No: 574) published in the Official Gazette dated 27.11.2024 and numbered 32735, the revaluation rate was determined as 43,93% (forty-three comma ninety-three) for the year 2024 in accordance with paragraph (B) of the repeated Article 298 of the Tax Procedure Law No. 213.

Guidelines on Competition Violations in Labor Markets: With the announcement published on the official website of the Competition Authority on 03.12.2024, it was announced that the Guidelines on Competition Violations in Labor Markets was approved with the decision of the Competition Board dated 21.11.2024 and numbered 24-49/1087-RM (4).

The Guidelines aim to set out the following basic principles,

- The place and importance of the conduct between undertakings in labor markets within the framework of Law No. 4054,
- What are the types of violations that may occur in labor markets within the framework of Article 4 of Law No. 4054, how such violations are/ will be evaluated by the Competition Board and what are the issues to be considered by third parties regarding the relevant violations,

- The criteria under which the ancillary restraint assessment for agreements between competitors in labor markets is/will be made,
- To what extent Articles 5, 6 and 7 of Law No. 4054 can be applied to agreements and actions in labor markets

Labor, which is an input for the provision of goods or services, is one of the parameters of competition between undertakings. Different types of agreements restricting competition between undertakings in labor markets are identified in the Guidelines as follows:

- Wage Fixing Agreements
- Employee Non-Solicitation Agreements
- Information Exchange
- Side Restrictions

In determining whether the transaction results in a substantial lessening of competition in the labor market, including but not limited to; (i) the shares of the parties to the transaction in the relevant labor market and the level of concentration of the market, (ii) the similarity of the qualifications of the employees employed by the parties to the transaction, (iii) barriers to entry into the relevant product market, (iv) the organization of labor suppliers in

the relevant labor market, (v) the costs of changing workplaces, (vi) the ability of competitors of the parties to the transaction to increase capacity utilization or make new investments, (vii) potential competitive pressure, (viii) whether the transaction increases the opportunities for cooperation between competitors operating in the relevant labor market, (ix) whether the transaction carries the possibility of a lethal takeover.

Communiqué (Serial No: 3) Amending the General Communiqué on the Implementation of the National Vehicle Recognition System (Serial No: 1): the Revenue Administration of the Ministry of Treasury and Finance entered into force after being published in the Official Gazette dated December 7, 2024. Within the scope of the National Vehicle Identification System (UTTS), which was established in order to ensure equal competition in the fuel market and to effectively combat the informal economy, the deadline for the obligation to have the necessary equipment installed in the vehicles and stations by registering to the system for the vehicles acquired through leasing or included in the business and used in the business has been extended until January 31, 2025. According to the Communiqué, vehicle owners will be able to start using the vehicle identification unit (TTB) and other equipment that they are

obliged to install and use until 31/1/2025 by having them installed or assembled until 30/4/2025 at the latest, provided that they make the necessary application and registration procedures at utts.gov.tr until the said date. Since the hardware prices will be updated at the end of the year based on the D-PPI increase rate, those who register to the system via "utts.gov.tr" until December 31, 2024 will be able to benefit from the prices valid for 2024. As of July 1, 2025, new vehicles that will be put on the road must be placed on the market with TTB by their importers or manufacturers.

Competition Authority Communiqué No: 2025/1: 07.12. With the Communiqué No. 2025/1 published in the Official Gazette dated 2024 and numbered 32745, the lower limit of the administrative fine regulated in the first paragraph of Article 16 of the Law No. 4054 on the Protection of Competition was determined as TL 241.043 to be valid from 1/1/2025 to 31/12/2025, based on the increase of 43.93% which is the revaluation rate for 2024 determined in the General Communiqué on Tax Procedure Law (Serial No: 574) published in the Official Gazette dated 27/11/2024 and numbered 32735.

Law Amending the Village Law and Certain Laws: With the Law No. 7534 published in the Official Gazette dated 12.12.2024 and numbered 32750, the following laws were amended in order to prevent possible problems by taking into account the decisions of the judicial authorities:

Amendment to Law No. 7221 on Geographical Information Systems and Amendments to Certain Laws:

- With the 10th paragraph added to the article titled "Collection, production, sharing of geographical data and financial and penal provisions" of Law No. 7221 with Article 17 of Law No. 7534, it is aimed to exempt the legal entities granted distribution licenses by EMRA within the scope of the provisions of the Electricity Market Law No. 6446 from the permission obligation of the Ministry of Environment, Urbanization and Climate Change to collect, produce, share or sell geographical data within the scope of the National

Geographical Data Responsibility Matrix of Turkey within the scope of distribution activities, provided that they are registered to the National Geographical Information Platform.

It is envisaged that the sale of geographical data by legal entities granted distribution licenses for commercial purposes outside the scope of the distribution license and revenue-generating sharing will be excluded from the scope of the exemption.

In the justification of the Article, it is stated that it is aimed to ensure that the costs that may arise from the distribution activities of the legal entities granted distribution licenses are reflected to the citizens at the minimum level by providing exemption to the distribution activities.

Amendment to Zoning Law No. 3194:

- Article 6 of Law No. 7534 added the provision that "technical infrastructure and transformer areas planned for public service and other public and public service areas," which are allocated as Regulatory Sharing Share under Article 18 titled "Preparation of Parcelization Plans" of the Zoning Law No. 3194, cannot be used for other purposes.
- Article 9 of Law No. 7534 added an Additional Article 11 to Law No. 194, and listed among the powers of the Ministry of Environment, Urbanization and Climate Change to make, have made and approve surveys, maps, all types and scales of environmental layout, master and implementation zoning plans, land and land arrangements and amendments related to energy and telecommunication facilities ex officio, and to issue licenses and occupancy permits ex officio in case no licenses are issued by the authorized administrations within two months from the date of application.

Regulation Amending the Regulation on Certification and Support of Renewable Energy Sources: The Amending Regulation published in the Official Gazette dated 17.12.2024 and numbered 32755 will enter into force on 01.01.2025 and the summary of the amendments is as follows:

- The definitions of "exempt generation amount," "YEK Support Mechanism (YEKDEM)," "YEKDEM participant," "YEK price" have been revised within the scope of aggregation license.
- With the amendment made in Article 4 of the Regulation, aggregators are also included in the YEK support mechanism. Accordingly, YEK Support Mechanism is the mechanism that "covers the price to be determined pursuant to the Presidential Decree No. 7189, not exceeding the market clearing price in the electricity market or the Schedule I annexed to the YEK Law, which will be utilized by persons generating electricity from renewable energy resources within the scope of LÜY through the responsible supply company or aggregator in whose region they are located, depending on their interest."
- With the amendment made to Article 5 f.3 of the Regulation regulating the applications for registration to YEKDEM, the responsible supply companies are obliged to purchase the surplus electricity supplied to the system by real or legal persons who have established generation facilities based on renewable energy resources within the scope of unlicensed generation in their region and are not included in any aggregator portfolio.
- With f.5 added to the same article, it is regulated that aggregators will be registered to YEKDEM for the billing periods in which they have unlicensed electricity generation facilities in their portfolios, without the need for any application.
- Article 8 f.3 regulating the beneficiaries of YEKDEM has been amended. Accordingly, real or legal persons whose electricity energy produced from renewable energy sources within the scope of LÜY is within the scope of exempted generation amount, as of the date their generation facilities are fully or partially put into operation;

- a) The authorized supply companies in their region for ten years,
- b) As of the end of the ten-year period, they benefit from YEKDEM through the aggregator or the incumbent supply companies in their region.

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Regulation Amending the Electricity Market Balancing and Settlement Regulation:

The summary of the amendments made by the Amending Regulation published in the Official Gazette dated 17.12.2024 and numbered 32755 is as follows:

- Definitions of “Balancing zone,” “Minimum stable generation level,” “Aggregator” and “Aggregation” were added to the Regulation.
- The article regulating the responsibilities of TEİAŞ as the system operator was amended and (f) Determination of balancing and bidding zones and trade boundaries (k) Submission of the list of substations within the balancing zone to the market operator in the required format was added.
- With the subparagraph added to Article 15 regulating the responsibilities of legal entities holding distribution licenses, distribution companies were given the duty to upload the meter data of the unlicensed generation facilities registered in the aggregation portfolio in bulk.
- Legal entities holding aggregator licenses and legal entities whose aggregation activities are included in the supply license shall not be a member or party of the group responsible for the balance (Art.20 f.4).
- With the amendment made to Art.21 f.2, the following were added to the units of supply and withdrawal for settlement:

ğ) The community formed on the basis of balancing region, which can be brought together on the basis of resource from the unlicensed electricity generation facility or facilities that have completed the ten-year purchase guarantee and brought together on the basis of resource.

h) The community established on the basis of balancing zone for the participation of licensed generation facilities without balancing units in the balancing power market and/or ancillary services within the scope of aggregation activity.

i) Provided that the criteria determined by TEİAŞ are met, the community formed on the basis of balancing region for the participation of consumption facilities in the balancing power market and/or ancillary services within the scope of aggregation activity.

- With the amendment made to Art. 26 regulating the legal entity registration application of market participants, it is regulated that market participants that obtain supply or aggregator licenses shall apply for legal entity registration to the Market Operator within 15 business days following the effective date of their licenses.
- Art. 28 f.1. and f.5 regulating the documents to be submitted by market participants when registering the settlement-based supply and withdrawal units for which they are responsible to the Market Operator have been amended within the scope of aggregation activities.
- The following sentences have been added to the second paragraph of Article 30/A regulating the supplier switching processes for the settlement-based export-draw units of eligible consumers:

“The request for addition to the portfolio made by another supplier for the eligible consumer included in the portfolio of an aggregator, which also provides supply service to the consumers included in its portfolio within the scope of demand response service, shall be rejected by the Market Operator, provided that TEİAŞ has not been notified by the aggregator to exit from its portfolio for demand response service within the scope of the fourth paragraph of Article 32/C in the same billing period for this consumer. The request for addition to the portfolio made by another supplier for a consumer participating in the balancing power market in the portfolio of an aggregator shall be rejected by the Market Operator, provided that no exit notification has been made by TEİAŞ for the aggregator’s participation in the balancing power market within the scope of the fourth paragraph of Article 32/C in the same

billing period for this consumer. A request for addition to the portfolio made for an eligible consumer by an aggregator that does not provide supply service to consumers in its portfolio within the scope of demand response service shall be rejected by the Market Operator if the relevant consumer is included in the aggregator’s portfolio within the scope of demand response service.”

Provisional Article 39 titled “Imbalance rate application” has been added to the Regulation. Pursuant to the added Article, the imbalance rate in the fifth paragraph of Article III for the groups responsible for the balance formed by the legal entities holding distribution licenses and the responsible supply companies in their regions by coming together shall be applied as 100% until 1/1/2027.

Decision of the Energy Market Regulatory Authority dated 12.12.2024 and numbered 13065 (Free Consumer Limit): Pursuant to the EMRA decision published in the Official Gazette dated 17.12.2024 and numbered 32755, the eligible consumer limit for 2025 will be applied as 750 kWh in accordance with the relevant articles of the Law on the Organization and Duties of the Energy Market Regulatory Board and the Electricity Market Consumer Services Regulation.

Amendments to Secondary Legislation on Aggregator License: On December 17, 2024, the following regulations were published in the Official Gazette.

- Regulation Amending the Electricity Market Balancing and Settlement Regulation
- Regulation Amending the Electricity Market License Regulation
- Regulation Amending the Electricity Market Ancillary Services Regulation
- Regulation Amending the Regulation on Storage Activities in the Electricity Market
- Regulation Amending the Regulation on Unlicensed Electricity Generation in the Electricity Market
- Regulation on Aggregation Activities in the Electricity Market

- Regulation Amending the Regulation on Renewable Energy Resource Guarantee Certificate in the Electricity Market
- Regulation Amending the Electricity Network Regulation
- Regulation Amending the Regulation on Certification and Support of Renewable Energy Resources

Law Amending the Electricity Market Law, Certain Laws and Decree Law No. 375 (Law No: 7429 Law Date: 22/12/2022): The Law was published in the Official Gazette dated December 28, 2022 and numbered 32057 and entered into force on the date of publication. The Law includes the following regulations regarding “Aggregation.”

Law No. 6446 on Electricity Market added “aggregation” and “aggregation activity” to the Electricity Market Law No. 6446. A new license called “aggregator” has been defined. Aggregation activity may be carried out by legal entities holding an aggregator license or a supply license. Aggregation means the management of users’ generation and/or consumption programs, ancillary service supply processes and the processes for the purchase and sale of electricity and/or capacity through an agreement. Grid users cannot authorize legal entities holding supply licenses with which they have an agreement to supply energy as aggregators.

Regulation on Aggregation in the Electricity Market: The Regulation aims to determine the activities that aggregators may carry out in the electricity market and the transactions to be carried out within the scope of the aggregation activity, and will enter into force on January 1, 2025.

The Regulation includes definitions of “aggregator” and “aggregation.” Aggregation may be carried out by obtaining a separate license or by the supply license holder, provided that it is included in the supply license. In the ancillary services and balancing power market, the “balancing zone” will be

announced by TEİAŞ until January 1, 2025. The balancing zone may be changed by TEİAŞ with 2 months prior notice. Aggregators will be able to enter into “aggregation service agreements” with licensed producers, eligible consumers, legal entities with storage facilities and unlicensed producers who have completed their ten-year purchase guarantee, which are not subject to Board approval, in order to participate in the processes related to electricity / capacity purchase and ancillary services.

The aggregator will enter into “aggregation agreements” with grid users; “market participation agreements” with EPIAŞ for organized electricity market activities; and “ancillary service agreements” with the grid operator.

The aggregator shall not enter into aggregation service agreements with the grid users included in its portfolio to supply electricity and shall not engage in wholesale activities within the scope of aggregation activities. The aggregator may supply electricity to eligible consumers in its portfolio; it is essential that the aggregator supplies electricity for the consumers, but otherwise the consumers’ existing agreements will continue. The aggregator will be responsible for conducting market transactions, including collateral and imbalance within its portfolio.

The aggregator will be able to monitor the instantaneous generation / consumption data of the grid users in its portfolio by contacting the grid operator.

The aggregator will inform the consumers in its portfolio via the PMS whether it will supply electricity or not. Disputes regarding imbalance costs between the aggregator and the supplier and the consumer will be resolved in accordance with the provisions of private law.

The aggregator will be able to include storage facilities, licensed generation facilities with an installed capacity below 100 MW, and unlicensed generation

facilities that have completed their 10-year purchase guarantee. Balancing units and/or ancillary service units will be determined according to the aggregator’s request and Teiaş’s criteria.

The total electrical installed capacity of the licensed and unlicensed electricity generation facilities in the aggregator’s portfolio can be maximum 2000 MW, of which a maximum of 500 MW can be unlicensed generators. If the 2000 MW limit (licensed and unlicensed together or licensed generation alone) is exceeded, an exit from the portfolio will be required to be valid in the next billing period. In case no exit from the portfolio is made, EPIAŞ will perform the exit process starting from the last licensed generator included in the portfolio. For unlicensed producers, the relevant aggregator will perform portfolio exit transactions based on the notification of EPIAŞ. Unless otherwise determined by the Board, there is no maximum limit for the aggregator portfolio in terms of consumption and storage facilities.

The aggregator may enter into bilateral agreements to balance its portfolio and may conduct transactions in organized electricity markets. The aggregator is responsible for balancing and settlement. The aggregator may participate in the ancillary services market. The aggregator is obliged to provide communication and control infrastructure (meters) for remote monitoring. The aggregator applies to the relevant grid operator for such investments to be made in generation and consumption facilities. Within 10 business days following the application, the necessary actions are taken under the supervision of the relevant grid operator. The costs to be incurred within this scope shall be borne by the aggregator. Preparations for remote monitoring control or communication infrastructure will be completed by TEİAŞ until May 1, 2025.

LEGAL DEVELOPMENTS

Regulation Amending the Electricity

Market License Regulation: The summary of the amendments made by the Amending Regulation published in the Official Gazette dated 17.12.2024 and numbered 32755 is as follows:

1. Amendments to Article 33 regulating the rights and obligations of the distribution license holder:

- With the subparagraph (bb) added to Art. 33 f.2, the distribution company is obliged to provide the legal entities engaged in aggregation activities, if requested by the aggregator in order for the aggregator to fulfill its obligations under the relevant legislation; to provide the necessary convenience for the installation of equipment such as meters and energy analyzers, provided that it is after the user's connection point to the system, and to provide the meter data of the users in its portfolio or for whom the aggregator has obtained consent within the scope of the Law No. 6698 on the Protection of Personal Data.
- The following paragraphs (8) and (9) have been added to the same article

“(8) The units of management and support services (accounting, finance, legal, human resources and similar services) required by distribution companies in order to continue their activities shall be established by them or these services may be procured through service procurement within the scope of Article 48 of this Regulation. However, distribution companies may not procure these services from the relevant parent company and the companies under the control of this company, except for other electricity distribution companies with the same shareholding structure.”

“(9) The distribution company shall provide services by using a different physical environment and information systems infrastructure than the incumbent supply companies.”

- Provisional Article 4 titled “Procurement of services within the scope of legal unbundling” has been repealed within the scope of the amendments made to Article 33.

2. Amendments to the scope of the aggregation license:

- Definitions of “Aggregator,” “Aggregation” and “Aggregation service agreement” were added to the Regulation.
- “Aggregation” was added to Article 6 regulating activities subject to licenses and “Aggregator license” was added to Article 8 regulating licenses.
- The seventh paragraph of Article 10 regulating the matters to be included in the preliminary license and license has been amended and it has been regulated that the aggregation license shall include provisions regarding the stand-alone electricity storage facility or facilities, if any, and the preliminary license or generation license shall include provisions regarding the electricity storage unit integrated to the generation facility, if any, and the electricity storage unit in the electricity generation facility with storage.

With the ninth paragraph added to the same article, the supply license will also include the issue regarding aggregation activities, if any.

- The minimum capital requirement for license applications has been revised in Article 20 f.4 (b).
- It has been regulated those legal entities holding a supply license or aggregator license will submit a license amendment application to the Authority if they wish to establish a stand-alone electricity storage facility, and TEIAS will be asked for an opinion on the subject. Regarding this issue, f.19, f.20 and f.23 have been added to Article 24.
- With f.13 added to Art.34, legal entities holding a supply license whose aggregation activity is included in their license are prohibited from engaging in aggregation activity on behalf of the grid users with whom they have an agreement to supply electricity.
- Article 34/A regulating the rights and obligations of the aggregation license holder has been added.
- Applications for aggregation licenses and amendment applications regarding the inclusion of aggregation activities in the supply license will be received as of 01.01.2025.

3. Inheritance exemption for share transfers

Article 57 f.2 stipulated that the acquisition of shares representing ten percent or more of the capital for legal entities holding licenses for tariff-regulated activities, and shares representing five percent or more of the capital for publicly traded companies, and share transfers resulting in a change of control in the shareholding structure were subject to the approval of the Board. With the amendment, inheritance transactions are exempted from the aforementioned share transfers.

New Monetary Limit for Application to the Consumer Arbitration Committee (“CAC”):

On 20.12.2024 dated 32758 numbered and published in the Official Gazette dated 20.12.2024, the Communiqué on the Increase of the Monetary Limits in Article 68 of the Law No. 6502 on the Protection of Consumers and Article 6 of the Regulation on Consumer Arbitration Committees (“Communiqué”) was published. Pursuant to the Communiqué, the application limit to the CAC has been increased by 43.93% revaluation rate determined in the General Communiqué No. 574 of the Tax Procedural Law.

Accordingly, Provincial or District Consumer Arbitration Committees are authorized for disputes with a value below 149,000 (one hundred forty-nine thousand) Turkish Liras for applications to be made for the year 2025.

Regulation Amending the Electricity Market Measurement Systems Regulation:

The amendments made by the Amending Regulation published in the Official Gazette dated 21.12.2024 and numbered 32759 are as follows.

Liabilities Deferred to 01.01.2026:

Provisional Article 3;

- With the amendment made in paragraph 1, the deadline for installing the meters purchased according to TEDAŞ MLZ/2017-062.A coded Electronic Electricity Meters Technical Specification has been postponed to 01.01.2026.

- With the amendment made in paragraph 2, the deadline for installing the communication units purchased according to TEDAŞ – MLZ/2019-064.A coded Communication Unit Technical Specification has been postponed to 01.01.2026.
- With the amendment made in paragraph 3, the deadline for installing meters and modems compatible with the Automatic Meter Reading System in places where Smart Meter PRO must be installed has been postponed to 01.01.2026.
- With the amendment made in paragraph 6, the deadline for the obligation of distribution companies to install Central Communication Software in accordance with the specifications published by TEDAŞ within the scope of MASS has been postponed to 01.01.2026.
- With the amendment made in paragraph 7, the deadline for the obligation of distribution companies to ensure integration with the Central Communication Software for the transfer and processing of data of all meters that can be read remotely has been postponed to 01.01.2026.
- With the amendment made in paragraph 8, it is stated that smart meters, modems, central communication software and data concentrators to be supplied by distribution companies as of 1/1/2026 must comply with the principle of interoperability.

Newly Added Clauses 9, 10 and 11:

- With the 9th Paragraph added to the Provisional Article 3, within the scope of subparagraph (d) of the second paragraph of Article 13, the obligation to replace the existing meters in the places of use with consumption in the previous year or consumption within the year over 10 MWh with meters and modems compatible with the Smart Meter PRO or Automatic Meter Reading System until 1/1/2026, starting from the high-consumption ones and not less than 40% on the basis of distribution company.
- With the 10th Paragraph added to the Provisional Article 3, provided that they are provided in accordance with the Technical Specifications for Electronic Electricity Meters coded TEDAŞ – MLZ/2017-062.A, electronic meters resulting from smart meter transformation within the scope of the fourth paragraph of Article 13 and at least two years before the expiration of the stamp period can be installed until 1/1/2028 instead of the same type of meters that need to be replaced due to malfunction, and it is regulated that the meters within this scope cannot be used in places where meters will be installed for the first time after 1/1/2026.
- With the 11th paragraph added to the Provisional Article 3, it is stated that the period for the replacement of the meters without remote communication

feature in the places of use in the 3rd paragraph of Article 13* by the relevant network operator within the following month will be applied as the following 3 months until 1/1/2026.

*(3) In case the consumers who are eligible consumers and whose consumption in the previous year or consumption within the year is over 10 MWh, exercise their right to choose a supplier after the effective date of this Regulation, the meters at the place of use must be Smart Meter PRO. In these places of use, meters without remote communication feature shall be replaced by the relevant network operator within the following month.

- The expression “less” in the second paragraph of Article 15 of the Regulation has been amended as “more”. For meters that are not within the scope of remote communication, the interruption and technical quality records on the meter are read by the electricity distribution companies in maximum 6-month periods and recorded in their related systems.

2025 License Fees: According to the Board Decision No. 13107 dated 19.12.2024, published in the Official Gazette No. 32762 dated 24.12.2024, the fees for pre-license and license issuance, annual license, license renewal, pre-license and license modification, and pre-license and license copies to be applied in 2025 have been determined.

The annual license fee that distribution companies are required to pay in 2025 for their 2024 activities is as follows:

License Type	Fee Criterion	Fee (Kr.)
Distribution License	Per kWh distributed (including lost and illegal energy distributed to users connected to the system)	0,015

LEGAL DEVELOPMENTS

2025 Renewable Energy Source Guarantee System Unit Fees: According to the Board Decision No. 13102 dated 19.12.2024, published in the Official Gazette No. 32762 dated 24.12.2024, the unit fees applicable in the Renewable Energy Source Guarantee System and Market for 2025 (excluding VAT) are as follows:

Fee Name	Unit Price	
Unit transaction fee	0.50 TL/MWh	100 million
Annual participation fee	2,000 TL	100 million

Unit prices will be effective starting from 01.01.2025.

2025 Forward Electricity Market Unit Fees: According to the Board Decision No. 13102 dated 19.12.2024, published in the Official Gazette No. 32762 dated 24.12.2024, the unit fees applicable in the Forward Electricity Market for 2025 (excluding VAT) are determined as follows:

Fee Name	Unit Price
Unit transaction fee	3.00 TL/MWh
Annual participation fee	12,500 TL
Rejected objection fee	1,000 TL per unit

Amendment to the Board Decision on the Instruction for the Use of the Energy Market Notification System: With the Energy Market Regulatory Authority's Decision No. 13115 dated 19.12.2024, changes were made to the Board Decision regarding the Instruction for the Use of the Energy Market Notification System (Appendix-1 Electricity Market Notification Obligations Table).

The changes include:

- The expression "7 business days" has been updated to "7 calendar days."
- The name of "EPTB-10 Semi-Annual Revenue Notification" has been revised as "EPTB-10 Loss Energy Notification."

Central Bank of the Republic of Turkey – Discount Interest Rate for Rediscount Transactions: According to the communiqué published in the Official Gazette dated 28 December 2024, the discount interest rate for rediscount transactions based on bills with a maturity of up to 3 months has been set at an annual rate of 48.25%, while the interest rate for advance transactions has been set at 49.25%. The communiqué came into effect on the date of its publication. On 28.12.2024, these rates were revised to 50.75% and 51.75%, respectively.

Procedures and Principles Amending the Procedures and Principles Regarding the Offsetting Transactions of Production and Consumption Facilities Located in Different Distribution or Incumbent Supply Company Regions: The phrase "the first ten days of the relevant billing period" in subparagraph (a) of the first paragraph of Article 6 of the Procedures and Principles Regarding Offsetting Transactions of Generation and Consumption Facilities Located in Different Distribution or Incumbent Supply Company Regions published in the Official Gazette dated 24/6/2023 and numbered 32231 has been amended as "the relevant billing period".

In the third paragraph of Article 11 of the same Procedures and Principles, the phrase "f" is the lowest relevant tariff price within the relevant group of the relevant VKN in the billing period" is replaced with "Provided that it does not exceed the monthly weighted average market clearing price for the residential subscriber group, if the high tier, Medium Voltage and Low Voltage tariff groups are included together in those connected from LV, the lowest relevant tariff price from the active energy prices of the LV high tier and other tariff groups within the group for surplus electricity energy; for other subscriber groups, the tariff price of

the relevant tier for the surplus generation corresponding to the lower tier, if any, and for the remaining amount, the lowest relevant tariff price from the active energy prices of the LV high tier and other tariff groups within the group for the surplus electricity energy price," and the sixth paragraph has been amended as follows.

Energy Market Regulatory Authority's Decision No. 13166 dated 26.12.2024: 28 According to Decision No. 13166 published in the Official Gazette No. 32766 dated 28 December 2024, as per the fifth paragraph of Article 6 of the Communiqué on the Regulation of Last Resort Supply Tariffs, the coefficient (KBK) determined by the Board to be used in the calculation of the last resort supply tariff for high-consumption consumers will be applied as follows starting from 01.01.2025:

- For the residential consumer group: 1.05
- For other consumer groups: 1.0938

The Energy Market Regulatory Authority's Decision No. 13150 dated 26.12.2024: 28 According to Decision No. 13150 of EMRA published in the Official Gazette dated 28 December 2024 and issue No. 32766, the system usage and system operation revenue cap for TEİAŞ for the year 2025 has been determined.

Energy Market Regulatory Authority Decision No. 13149 Dated 26/12/2024: to EPDK Decision No. 13149, published in the Official Gazette dated December 28, 2024, and numbered 32766, the active electricity energy price for sales by EÜAŞ to distribution companies as of 01/01/2025 has been set as follows:

- 175.00 kuruş/kWh for technical and non-technical loss energy.
- 380.00 kuruş/kWh for general lighting.

Energy Market Regulatory Authority Decision No. 13130-2 Dated 26/12/2024: According to EPDK Decision No. 13130-2, published in the Official Gazette dated December 28, 2024, and numbered 32766, the Procedures and Principles Regarding Applications for Pre-License and License Transactions have been accepted and published along with their annexes.

Energy Market Regulatory Authority Decision No. 13156-13 Dated 26/12/2024: It has been decided that the technical quality measurement service fees will be applied as follows starting from 01/01/2025:

Technical Quality Measurement Service Fees	2025
Device Class	Fee (TL)
	LV
S Class	482.5
A Class	742.4

Energy Market Regulatory Authority Decision No. 13156-12 Dated 26/12/2024: It has been decided that the fees for project approval and acceptance processes for unlicensed solar energy-based electricity generation facilities within the scope of the Regulation on Unlicensed Electricity Generation will be applied as follows starting from 01/01/2025:

Solar Energy-Based Unlicensed Electricity Generation Facilities	Project Approval and Acceptance Fees	Solar Energy-Based Unlicensed Electricity Generation Facilities	Approval and Acceptance Fees
Approval Scope	Fee (TL)	Acceptance Scope	Fee (TL)
50 kWe and below (LÜY Scope)	0	50 kWe and below (LÜY Scope)	0
50 kWe - 100 kWe (inclusive) (LÜY Scope)	1,648.8	50 kWe - 100 kWe (inclusive) (LÜY Scope)	3,137.6
100 kWe - 300 kWe (inclusive) (LÜY Scope)	5,279.3	100 kWe - 300 kWe (inclusive) (LÜY Scope)	9,249.6
300 kWe - 500 kWe (inclusive) (LÜY Scope)	14,314.8	300 kWe - 500 kWe (inclusive) (LÜY Scope)	19,896.3
500 kWe - 700 kWe (inclusive) (LÜY Scope)	22,785.2	500 kWe - 700 kWe (inclusive) (LÜY Scope)	23,194.5
700 kWe - 1 MWe (exclusive) (LÜY Scope)	35,117.1	700 kWe - 1 MWe (exclusive) (LÜY Scope)	38,111.7
1 MWe and above (LÜY Scope)	35,117.1 + (Installed Capacity in kWe - 1000) × 41.31	1 MWe and above (LÜY Scope)	38,111.7 + (Installed Capacity in kWe - 1000) × 44.84



LEGAL DEVELOPMENTS

The EPDK has published a fact sheet on its website answering the following questions for public awareness:

- Who is a Free Consumer? What Does the Concept of Last Resort Supply Mean for Free Consumers?
- What is the Last Resort Supply Tariff? How Does It Differ from the National Tariff?
- Which Charges on Our Bills Change Under the Last Resort Supply Tariff?
- What Changes Are Envisioned in the Last Resort Supply Tariff Regulation by EPDK for 2025?
- What Percentage of Residential Subscribers Are Affected by This Regulation?

- Will All Electricity Subscribers' Bills Increase Due to This Regulation?
- From What Date Will an Electricity Subscriber Be Included in the Last Resort Supply Tariff (SKTT)?
- Is It Possible for an Electricity Subscriber to Exit the SKTT?
- How Will Agricultural Consumers Be Affected by This Regulation?
- Will Mosques, Places of Worship, Cemevis, and Associations Be Affected by This Regulation?
- How Can Electricity Subscribers Verify the Accuracy of Their Bills?

- Do Free Consumers (Electricity Subscribers Under SKTT) Have an Obligation to Make a Bilateral Agreement? Is It Possible to Procure Electricity Without a Bilateral Agreement?

For more information, visit: EPDK SKTT Information Page

Energy Market Regulatory Authority Decision No. 13156-1 Dated 26/12/2024 Security-Deposit:

It has been decided that security deposits will be applied as follows starting from 1/1/2025:

Security Deposit	2025
Consumer Groups	Unit Fee (TL/kW)
Industry, Public and Private Services Sectors, and Others	569.4
Residential	200.3
Martyr Families and Veterans	100.0
Agricultural Activities, Lighting, and Others	270.2

Energy Market Regulatory Authority Decision No. 13156-2 Dated 26/12/2024 – Disconnection and Reconnection Fees: In accordance with Article 2 of the Procedures and Principles Regarding Disconnection and Reconnection Fees, it has been decided that the fees will be applied as follows starting from 1/1/2025:

Disconnection and Reconnection Fees	2025
Voltage Level	Fee (TL)
LV	106.8
MV	799.6

Energy Market Regulatory Authority Decision No. 13156-3 Dated 26/12/2024 – Meter Inspection Fees: In accordance with Article 5 of the Procedures and Principles Regarding Meter Inspection Fees, it has been decided that the fees will be applied as follows starting from 1/1/2025:

Meter Inspection Fees	2025
Meter Type	Fee (TL)
Direct-connected single-phase active or three-phase active and/or reactive meters	148.0
Current transformer and/or voltage transformer-connected active and/or reactive meters	187.5

Energy Market Regulatory Authority Decision No. 13156-4 Dated 26/12/2024 – Payment Notification and Second Notification Fees: It has been decided that the fees for payment notifications and second notification services provided by distribution companies to authorized supply companies will be applied as follows starting from 1/1/2025:

Payment Notification and Second Notification Fees	2025	
	Fee (TL)	
	LV	MV
Payment Notification	0.316	3.16
Second Notification	6.34	63.57
Payment Notification with Second Notification	0	

Energy Market Regulatory Authority Decision No. 13156-5 Dated 26/12/2024 – License-Exempt Application Fee: In accordance with Article 36, Paragraph 2(a) of the Regulation on License-Exempt Electricity Generation, it has been decided that the application fees to be collected by the relevant network operator for 2025 will be applied as follows:

License-Exempt Application Fee	2025
Power Range	Fee (TL/Year)
0-50 kW (inclusive)	0
50-250 kW (inclusive)	2,524.8
250 kW-5 MW (inclusive)	5,049.7
Above 5 MW	10,099.2

Energy Market Regulatory Authority Decision No. 13156-6 Dated 26/12/2024 – GTS Annual Operating Fee: In accordance with Article 36, Paragraph 2(b) of the Regulation on License-Exempt Electricity Generation, it has been decided that the annual operating fees to be collected by authorized supply companies for 2025 will be applied as follows:

GTS Annual Operating Fee	2025
Power Range	Fee (TL/Year)
0-50 kW (inclusive)	0
50-250 kW (inclusive)	5,049.7
250 kW-5 MW (inclusive)	10,099.2
Above 5 MW	20,198.0

LEGAL DEVELOPMENTS

Energy Market Regulatory Authority Decision No. 13156-7 Dated 26/12/2024 – Network Operator Annual Operating Fee: In accordance with Article 36, Paragraph 2(b) of the Regulation on License-Exempt Electricity Generation, it has been decided that the annual operating fees to be collected by the relevant network operator for 2025 will be applied as follows:

Network Operator Annual Operating Fee	2025
Power Range	Fee (TL/Year)
0-50 kW (inclusive)	0
50-250 kW (inclusive)	7,060.5
250 kW-5 MW (inclusive)	14,120.6
Above 5 MW	28,240.6

Energy Market Regulatory Authority Decision No. 13156-8 Dated 26/12/2024 – Transaction Fees: In accordance with Article 36, Paragraph 2(c) of the Regulation on License-Exempt Electricity Generation, it has been decided that the transaction fees to be collected by the relevant network operator and authorized supply companies for 2025 will be applied as follows:

Transaction Fees	2025
Transaction Type	Fee (TL)
Share Transfer	0
Other Transactions	3,212.1

Energy Market Regulatory Authority Decision No. 13156-9 Dated 26/12/2024 – Project Approval and Acceptance Fees: In accordance with the Regulation on License-Exempt Electricity Generation, it has been decided that the fees for project approval and acceptance processes for rooftop and façade solar energy systems with a capacity of 50 kW or less will be applied as follows starting from 1/1/2025:

Project Approval and Acceptance Fees for Rooftop and Façade Solar Energy Systems with a Capacity of 50 kW or Less	2025
Process Type	Fee (TL)
Project Approval	0
Project Acceptance	0

Energy Market Regulatory Authority Decision No. 13156-10 Dated 26/12/2024 – Additional Data Request for AMR: It has been decided that the fee to be charged for additional data requests within the scope of the Automatic Meter Reading System (AMR) will be applied as follows starting from 1/1/2025:

Additional Data Request Fee for AMR	2025
Per Meter/Month	Fee (TL)
	46.9

Energy Market Regulatory Authority Decision No. 13156-11 Dated 26/12/2024 – Connection Lines: In the meeting of the Energy Market Regulatory Authority dated 26/12/2024, the following decisions were made:

- When both overhead and underground cables are used in the connection line, the unit price will be calculated by separately considering the lengths of the overhead and underground lines.
- For connection fees of lines above 100 kW, the fee will be calculated by adding the result of multiplying every kW over 100 kW by 3.87 TL/m to the base fee of 957.59 TL/meter applicable for up to 100 kW.
- Consumers receiving connection services from the distribution company will not be charged any fees other than those specified below on a TL/meter basis under any name.
- The connection power defined in Article 3, Paragraph 1 of the Connection Agreement to the Distribution System and specified in the relevant regulations will be taken as the basis for the connection fee.
- Consumer distribution connection fees will be applied as follows starting from 1/1/2025:

Low Voltage (LV) Connection Fee	2025	Unit Fee (TL/meter)
0-15 kW (inclusive)	Underground	518.09
	Overhead	359.88
15-50 kW (inclusive)	Underground	701.32
	Overhead	468.79
50-100 kW (inclusive)	Underground	957.59
	Overhead	535.07
Above 100 kW	Underground	$957.59 + 3.87 \times (\text{Power}-100)$

Medium Voltage (MV) Connection Fee	2025	Unit Fee (TL/meter)
0-15 kW (inclusive)		2,040.53
15-50 kW (inclusive)		975.32

LEGAL DEVELOPMENTS

Communique on the Default Interest Rate and Minimum Compensation Amount for Collection Costs Applicable to Late Payments in the Procurement of Goods and Services: According to the Notification on the Default Interest Rate and Minimum Compensation Amount for Collection Costs Applicable to Late Payments in the Procurement of Goods and Services, published in the Official Gazette dated January 2, 2024, and numbered 32770, and effective as of January 1, 2025, the default interest rate to be applied for late payments in the procurement of goods and services where no rate is stipulated in the contract or the related provisions are invalid, is determined at 53.2% annually. The minimum compensation amount for collection costs that can be requested is set at 1,475.00 TL in accordance with Article 1530, Paragraph 7 of the Turkish Commercial Code.

Energy Market Regulatory Authority's Decision No. 13179 Dated 31.12.2024 – Renewable Energy Support Mechanism (YEKDEM) Cost: According to the EPDK Decision No. 13179, published in the Official Gazette dated December 31, 2024, and numbered 32769 (5th Repeated Issue), the projected YEKDEM (Renewable Energy Resources Support Mechanism) cost per unit of energy supplied for the year 2025, as outlined in Article 14, Paragraph 2 of the Regulation on the Certification and Support of Renewable Energy Resources, has been approved as follows:

Month	Projected YEKDEM Cost for 2025 (TL/MWh)
January	223.14
February	289.39
March	353.65
April	580.92
May	435.68
June	460.71
July	265.22
August	271.96
September	345.59
October	476.43
November	393.59
December	444.24

Regulation on Administrative Fines to Be Imposed for Restrictive Agreements, Concerted Practices, Decisions, and Abuse of Dominant Position: The Regulation on Administrative Fines to Be Imposed for Restrictive Agreements, Concerted Practices, Decisions, and Abuse of Dominant Position ("Regulation") was published in the Official Gazette dated December 27, 2024, and numbered 32765, and entered into force on the same date. Simultaneously, the Regulation on Administrative Fines to Be Imposed for Restrictive Agreements, Concerted Practices, Decisions, and Abuse of Dominant Position, published in the Official Gazette dated February 5, 2009, and numbered 27142 ("Repealed Regulation"),

was abolished. In its announcement, the Competition Board ("Board") emphasized the need for new regulations to ensure fairer penalties, particularly considering developments in digital markets, in line with evolving practices and case law.

Base Fine: Under the Repealed Regulation, the base fine rates for cartels and other violations were differentiated. For cartel violations, the base fine ranged between 2-4% of the undertaking's annual gross income, while for other violations, it ranged between 0.5-3%. The new Regulation eliminates this distinction, and the base fine rate for each violation will now be determined freely by the Board.

According to the new Regulation, when determining the base fine rate, the Board will consider the damage caused or likely to be caused by the violation and whether the violation is an obvious or severe infringement. The base fine rate will be adjusted depending on the duration of the violation, increasing from 1/5 to 1 times the starting penalty rate, provided the violation lasts at least one year. Aggravating or mitigating factors will then adjust the base fine as per the specified rates in the Regulation.

Increase Based on Violation Duration: Under the Repealed Regulation, the duration of the violation was a reason for increasing the base fine. If the violation lasted between 1 and 5 years, the fine increased by half, and if it lasted more than 5 years, it increased by double. In the new Regulation, the duration of the violation remains a reason for increasing the fine, with the following updated rates:

- Violations lasting over 1 year but less than 2 years: 20% increase
- Violations lasting over 2 years but less than 3 years: 40% increase
- Violations lasting over 3 years but less than 4 years: 60% increase
- Violations lasting over 4 years but less than 5 years: 80% increase
- Violations lasting over 5 years: 100% increase

Aggravating and Mitigating Factors: Changes have been made to aggravating and mitigating factors in the new Regulation. For mitigating factors, lower and upper limits for reductions have been removed. For aggravating factors, the lower limit has been eliminated.

Mitigating Factors:

- Providing information or documents to facilitate on-site inspections.
- Being under pressure from other undertakings to engage in the violation.
- Limited participation in the violation.
- A low share of the violation-related activities in total revenue.
- The existence of overseas sales revenue.

For the first time, "limited participation in the violation" and "the existence of overseas sales revenue" have been included as mitigating factors.

Aggravating Factors:

- If the violation of Article 4 (horizontal agreements) and/or Article 6 (abuse of dominant position) of the Law is repeated by the same undertaking or association of undertakings after the Board identifies such violations, the base fine rate may be increased by up to 1 times.
- Continuing the violation after the notification of the investigation decision, having a decisive influence in the violation, or breaching the confidentiality obligation under Article 12(3) of the Settlement Regulation may result in the base fine rate being increased by up to 1 times.
- If the aggravating factors specified in the first and second paragraphs are present simultaneously, the increases determined under each paragraph will be combined and applied to the base fine rate.

Penalties for Managers: Under the Repealed Regulation, managers and employees with a decisive influence in cartels were fined 3-5% of the penalty imposed on the undertaking. For those who cooperated actively, no penalty or reduced penalties were applied under the Active Cooperation Regulation. For other violations, managers and employees with a decisive influence could be fined up to 5% of the penalty imposed on the undertaking. Cooperation with the Authority could result in no penalty or reduced penalties depending on the timing, effectiveness, and nature of the cooperation.

Decisive Influence: Refers to an indispensable role in causing and/or maintaining the violation.

- Managers and employees with a decisive influence in the violation will now be fined up to 5% of the penalty imposed on the undertaking or association of undertakings.
- The distinction between cartel and other violations has been removed, and the same penalty rate will apply to all managers and employees with a decisive influence.

Regulation Amending the Fee Regulation for Inspection and Stamping of Measuring Instruments:

The Regulation Amending the Fee Regulation for Inspection and Stamping of Measuring Instruments, published in the Official Gazette dated December 27, 2024, and effective as of January 1, 2025, specifies the fees to be collected for initial, periodic, and stock inspections of measuring instruments, as well as the fees for inspections of repair and adjustment stations for electricity, water, and gas meters.

Communique on Administrative Fines to Be Applied in 2025 Pursuant to Article 16 of the Electricity Market Law:

With the notification published in the Official Gazette on December 26, 2024, the administrative fines stipulated in Article 16 of the Electricity Market Law have been increased based on the revaluation rate. The notification came into effect on 01/01/2025.

LEGAL DEVELOPMENTS

RELATED ARTICLE OF THE LAW	ADMINISTRATIVE FINE AMOUNT PRESCRIBED IN THE LAW (TL)	ADMINISTRATIVE FINE AMOUNT TO BE APPLIED IN 2025 (TL)
If it is determined that incorrect, incomplete, or misleading information is provided, no information is provided, or on-site inspection is not allowed during the Board's requests for information or on-site inspections, a warning is issued to provide correct information or allow inspection within fifteen days. If the violation continues despite the written warning, an administrative fine will be imposed Article 16, Paragraph 1 (a)	500,000	8,228,246
If it is determined that actions are contrary to the law, secondary legislation, license provisions, Board decisions, or instructions, a warning is issued to correct the violation within thirty days or not to repeat it. If the violation continues or is repeated despite the written warning, an administrative fine will be imposed Article 16, Paragraph 1 (b)	500,000	8,228,246
If a violation of the law, secondary legislation, or license provisions occurs in a manner that does not allow for correction due to its nature, an administrative fine will be imposed without the need for a warning. Article 16, Paragraph 1 (c)	500,000	8,228,246
If false documents are submitted, misleading information is provided, or changes affecting license conditions are not reported to the Board during the license application or the license term, an administrative fine will be imposed. Article 16, Paragraph 1 (ç)	800,000	13,165,226
If actions are contrary to the prohibition of affiliate relationships during the license term, a warning is issued to correct the affiliate relationship within thirty days. If the violation continues despite the written warning, an administrative fine will be imposed. Article 16, Paragraph 1 (d)	900,000	14,810,867
If it is determined that activities outside the scope of the license are conducted in the market, a warning is issued to stop out-of-scope activities or adverse activities within fifteen days. If the violation continues despite the written warning, an administrative fine will be imposed. Article 16, Paragraph 1 (e)	1,000,000	16,456,551
Outside of inspections of electricity distribution companies, if deficiencies are identified in non-functioning or missing luminaires and/or poles under general lighting, a time limit is provided for correction. If deficiencies are not corrected within the specified time, the Ministry will report to the Board, which will impose a fine of five hundred Turkish lira for each pole or luminaire identified. The time limits for correcting deficiencies and the rules for identifying deficiencies will be determined by regulation. Administrative fines imposed under this Law must be paid within one month of notification Article 16, Paragraph 8	500	6,531

Regulation Amending the General Lighting Regulation: With the amendment published in the Official Gazette dated 31.12.2024 and coming into force on the same date:

- The time periods specified in Provisional Article 7 of the General Lighting Regulation have been postponed. The deadline for including general lighting meters in the Automatic Meter Reading System ("AMR") has been extended from 31.12.2024 to 31.12.2025.

- Additionally, the final date regarding the non-payment of general lighting costs to distribution companies due to the inability of TEDAŞ to monitor general lighting meters instantly and/or online as of 1.1.2025 has been extended to 1.1.2026.

With this amendment, the obstacle to obtaining general lighting payments from the budget specified in Provisional Article 6 of the Electricity Market Law, including the January 2025 period, has been removed.

Administrative Fine Amounts Under the Personal Data Protection Law No. 6698:

The administrative fines stipulated in Article 18 of the Personal Data Protection Law No. 6698 have been increased annually as of the beginning of each calendar year, in accordance with Article 17, Paragraph 7 of the Misdemeanors Law No. 5326, and pursuant to the provisions of Article 298 (repeated) of the Tax Procedure Law No. 213. These fines have been updated based on the revaluation rates determined and announced for the years 2017-2025.

Article	Violation-Causing Article	Description	2024 PENALTY AMOUNTS 68.46%	2025 PENALTY AMOUNTS 43.93%
18/a	10	Failure to fulfil the obligation of providing information	47,303	68,083
18/b	12	Failure to fulfil obligations related to data security	141,934	204,285
18/c	15	Failure to implement Board decisions	236,557	340,476
18/d	16	Acting contrary to the obligation of registering and notifying the Data Controllers' Registry	189,245	272,380

Note: Administrative fines are adjusted annually in accordance with the revaluation rates as per Article 17, Paragraph 7 of the Misdemeanors Law.



LEGAL DEVELOPMENTS

Personal Data Protection Authority - Guide on Transferring Personal Data Abroad:

The Guide on Transferring Personal Data Abroad has been prepared to provide guidance to data controllers regarding the implementation of personal data transfers under Article 9, titled "Transfer of Personal Data Abroad," of the Personal Data Protection Law No. 6698.

Communique on Administrative Fines to Be Applied in 2025 Pursuant to the Turkish Commercial Code No. 6102:

The administrative fines stipulated in Articles 33, 38, 51, and 562 of the Turkish Commercial Code No. 6102 have been recalculated and updated by increasing them by 43.93% as determined in the Tax Procedure Law General Communiqué (No. 574) published in the Official Gazette dated 27/11/2024 and numbered 32735 for the revaluation rate of 2024.

TEDAŞ-MLZ/2024-081 Marked Communication (Head-End) Software Technical Specification:

The TEDAŞ-MLZ/2024-081 marked Communication (Head-End) Software Technical Specification has come into force, and its use will be mandatory as of 01/01/2026. The mentioned technical specification has been made available for the stakeholders of the electricity distribution sector in the Information Center/Specifications/Strategy Development Department section at www.tedas.gov.tr.

MAJOR LEGISLATIVE CHANGES IN THE RETAIL BUSINESS SEGMENT:

Communiqué on the Default Interest Rate to be applied for Late Payments in the Supply of Goods and Services and the Minimum Expense Amount that can be Claimed for the Collection Costs of Receivables: Pursuant to the Communiqué published by the Central Bank of the Republic of Turkey in the Official Gazette dated 02.01.2024 and numbered 32417, pursuant to Article 1530 of the Turkish Commercial Code No. 6102, effective from 01.01.2024, the default interest rate for late payments made to the creditor in the supply of goods and services between commercial enterprises has been determined as 48.00 percent per

annum in cases where it is not stipulated in the contract or the relevant provisions are invalid, and the minimum amount of expenses to be claimed for the collection of receivables as TL 1310.

Energy Market Regulatory Board Decision dated 01.02.2024 and numbered 12404:

With the Board Decision No. 12404 published in the Official Gazette dated 02.02.2024 and numbered 32448, it was decided to adopt the "Procedures and Principles Regarding the Procedures to be Established in Case of Incorrect Measurement Recording or Non-Recording of Measurement in the Meters Located in the Transmission System and Intervention in the Meter / Measurement Circuit." With the Procedures and Principles, it is aimed to determine the methods to be used in determining the user's meter data and the time of intervention in cases where it is determined that the main meter or the main and backup meters cannot be read remotely or are read incorrectly, do not record or make incorrect measurements as a result of control and testing, the seal is broken or any intervention is made to the meters or the measurement circuit in a way that prevents the meters from measuring correctly. The Procedures and Principles cover the meters that measure the electric energy transferred to or withdrawn from the transmission system.

In case it is determined that the data of the main meter for settlement cannot be read automatically remotely or that the remote reading system reads incorrectly, the data of the main meter will be obtained by on-site reading.

The measurement differences arising from the meter not measuring or measuring incorrectly and the transmission charges calculated on the basis of the transmission tariffs for the relevant period shall be invoiced or refunded to the user at once within 10 business days after the detection of the problem and no default interest shall be applied in these transactions. Measurement differences will be sent to EPIAŞ within 10 business days from the detection of the problem for Retrospective Correction Item transactions.

The period during which the data determined retrospectively within the scope of the Procedures and Principles will be used shall not exceed the Retrospective Adjustment Item objection period specified in the Electricity Market Balancing and Settlement Regulation in terms of settlement calculations carried out by EPIAŞ, and the statute of limitations in the relevant legislation in terms of calculations regarding transmission costs and system usage violations.

In addition to these, the published Procedures and Principles also regulate issues such as incorrect data recording or non-recording of data by the meter(s) subject to settlement, measurement of the meter outside the sensitivity class, intervention of the meter and/or meter circuit by the user, and determination of the retroactive correction date.

The Procedures and Principles enter into force on the date of publication.

Decision of the Energy Market Regulatory Board dated 14.03.2024 and numbered 12495:

With the Board Decision No. 12495 published in the Official Gazette dated 16.03.2024 and numbered 32491, it was decided to adopt the "Procedures and Principles Amending the Collateral Procedures and Principles."

With the amendment, the obligation to electronically submit the letters of guarantee required to be submitted by the market participants regarding the day-ahead market, intraday market, balancing power market and financial settlement transactions within the scope of the Electricity Market Balancing and Settlement Regulation has been introduced, and it has been regulated that the foreign exchange buying rate announced by the Central Bank of the Republic of Turkey at 15:30 one business day before the calculation day will be taken as the basis for the electronic letters of guarantee to be submitted in foreign currency.

The deadline for the replacement of existing letters of guarantee with electronic letters of guarantee has been set as 01.01.2025, and the letters of guarantee that are not replaced by this date will not be taken into account in collateral calculations.

In addition, the amendment allows the collaterals provided to be partially or completely replaced with other securities accepted as collateral in the Procedures and Principles; in case there is an interim injunction decision issued by the legal authorities regarding the collaterals provided by the market participant or in case of detection of situations that eliminate the ability of the securities provided as collateral to be collateral, such securities will not be taken into account in the total collateral calculation.

Finally, with the amendment, the records of all eligible consumers registered in the Market Management System on behalf of the market participant will be deleted, effective from the first business day when the participant's collateral level does not meet the additional collateral amount required to be submitted as of 11:00, and for the eligible consumers in the portfolio of the sanctioned market participant, the amount of energy received as imbalance due to the withdrawals of the relevant eligible consumers by the market participant supplying energy to the incumbent supply company and the relevant Organized Industrial Zone with a distribution license will be evaluated at the market clearing price for the settlement periods determined by the Market Operator for the settlement periods, including the second business day following the notification made to the relevant parties from the date of the drop to the portfolio.

Board Decision of the Energy Market Regulatory Authority dated 28.03.2024 and numbered 12532:

With the Board Decision No. 12532 published in the Official Gazette dated 29.03.2024 and numbered 32504, due to the ongoing effects of the Kahramanmaraş-centred earthquakes dated February 6, 2023, pursuant to Article 140 of the Electricity Market Balancing and Settlement Regulation (Regulation), until September 30, 2024;

Akedaş Elektrik Dağıtım A.Ş., Dicle Elektrik Dağıtım A.Ş., Fırat Elektrik Dağıtım A.Ş., Toroslar Elektrik Dağıtım A.Ş. and the incumbent supply companies operating in the said distribution regions;

The categories of the incumbent supply companies within the scope of subparagraphs (a), (b), (c) and (ç) of the second paragraph of Article 17 of the Regulation,

It has been decided that the amounts included in the advance payment notifications specified in the first paragraph of Article 132/Ç of the Regulation, which are obliged to be paid for the supply companies in which the Organized Industrial Zones are directly or indirectly shareholders, shall be postponed until the invoice due date for the relevant invoice period, no default interest shall be applied to the market operator and market participant during the period of postponement of advance payments, and the Decision shall enter into force on April 1, 2024.

Determination of Interest Rates Applicable to Rediscount and Advance Transactions:

With the Official Gazette dated 01.04.2024 and numbered 32507, the discount interest rate to be applied in rediscount transactions was determined by the Central Bank of Turkey as 50.75 percent per annum and the interest rate to be applied in advance transactions as 51.75 percent per annum, and these rates entered into force as of 01.04.2024.

Regulation on the Payment of Lighting Expenses of Cemevis:

Published in the Official Gazette No. 32523 dated 20.04.2024, the Regulation on the Payment of the Lighting Expenses of Cemevis, which was issued on the basis of "ANNEX ARTICLE 6" of the Electricity Market Law No. 6446 dated 14.03.2013 and Article 292/A of the Presidential Decree No. 1 on the Organization of the Presidency, aims to determine the principles and procedures to be applied in the payment of the lighting expenses of Cemevis from the budget of the Ministry of Culture and Tourism.

Energy Market Regulatory Board's Board Decision dated 25.04.2024 and numbered 12583:

With the Board Decision numbered 12583 published in the Official Gazette dated 28.04.2024 and numbered 32530, it has been decided to determine the Turkish Average Wholesale Electricity Price for 2023 as 222.96 kr/kWh within the scope of the Law No. 5346 on the Use of Renewable Energy Resources for Electricity Generation.

Energy Market Regulatory Board's Board Decision dated 02.05.2024 and numbered 12608:

With the Board Decision numbered 12608 published in the Official Gazette dated 07.05.2024 and numbered 32539, it has been decided to revise the Method Statement for Calculation and Implementation of Transmission System Usage and System Operation Tariffs approved by the Board Decision dated 28.12.2023 and numbered 12316.

In the Method Statement, which has started to be legally implemented as of the effective date of TEİAŞ Transmission License and started its seventh implementation period as of 2024; 15 tariff regions to be applied in the seventh implementation period have been determined based on the Regional Connectable Capacity Report prepared by TEİAŞ within the scope of the Electricity Market Law No. 6446. The system utilization and system operation tariffs based on the transmission fees to be charged to the interconnection users, separately for all interconnection lines, can be determined separately by TEİAŞ with the opinion of the Ministry of Energy and Natural Resources and in this case, the relevant fees are submitted to EMRA for approval.

7501 Law Amending the Mining Law and Certain Laws:

The significant amendments of the 7501 Law Amending the Mining Law and Certain Laws published in the Official Gazette dated 11.05.2024 and numbered 32543 are as follows;

Regarding the Law on the Usage of Renewable Energy Resources for The Purpose of Generating Electricity No. 5346

With the amendments to the second and third sentences of the second paragraph of the second paragraph of Article 4 titled "Determination, protection and usage of resource areas," it is aimed to determine the method and other elements that can be competed in YEKA competitions held by open auction method by the Ministry of Energy and Natural Resources in the relevant competition specifications. Thus, a more dynamic structure is aimed by eliminating the factors that delay investments depending on the changing conditions of the day.

LEGAL DEVELOPMENTS

With the amendment made in the second paragraph of Article 6 titled "YEK Support Mechanism," the contribution fee determined for the transition of unlicensed electricity generation facilities that have completed their ten-year period to licensed generation activities has been changed and associated with the YEK Support Mechanism prices. In this way, it is aimed to ensure that the generation facilities that will complete their ten-year period and switch to licensed generation activities will generate income in line with other facilities that are included in the YEK Support Mechanism or that obtain generation licenses as a result of YEKA competitions and carry out licensed generation activities.

- **Regarding the Electricity Market Law No. 6446**

Provisional Article 32 titled "Right to terminate licenses and pre-licenses" has been added. With this paragraph, legal entities that have been granted the right to connection capacity and have generation licenses, preliminary licenses or license applications will be given the right to cancel the relevant contracts, licenses, preliminary licenses or preliminary license/license applications by applying to the Ministry of Energy and Natural Resources and the Energy Market Regulatory Authority upon their request. Thus, it is aimed to release the connection capacities granted to facilities that cannot be installed.

- **Regarding the Energy Efficiency Law No. 5627**

Article 3 titled "Definitions", subparagraph b has been amended and subparagraphs "ü" and "v" have been added to the paragraph. "b) Applicant: Real or legal persons who wish to benefit from energy efficiency supports," "ü) Carbon intensity: The amount of carbon dioxide emissions emitted per unit of product and/or area or similar, "v) Specific energy consumption: The amount of energy consumed per unit of product and/or area or similar," Article 8 titled "Supports" has been revised in line with the support for energy efficiency implementation projects, reduction of energy intensity, research and development projects.

Regulation Amending the Regulation on Unlicensed Electricity Generation in the Electricity Market: Significant amendments in the Regulation Amending the Regulation on Unlicensed Electricity Generation in the Electricity Market published in the Official Gazette dated 14.05.2024 and numbered 32546 are as follows:

In Article 7, it is regulated that real or legal persons cannot establish a generation facility within the scope of this Regulation for consumption facilities within the scope of temporary connection, except for temporary subscriptions of consumption facilities under construction, but the consumption within the scope of temporary subscriptions can be included in offsetting with the generation facilities in operation belonging to the same real or legal person and in the same subscriber group.

Article 10 regulates states that no document return will be made for applications received electronically,

Article 16 regulates that in case the technical interaction permits for applications based on wind energy is negative, the applicant shall be given the right to apply to the relevant grid operator for site change or revision within sixty days.

Article 17 regulates that those who have been notified of a letter of invitation to the connection agreement will be given one year from the date of notification of the letter of invitation to the connection agreement. It is obligatory for the holders of the letter of invitation to the connection agreement to have the generation facility and the connection line project, if any, approved by the Ministry or the institutions and/or legal entities authorized by the Ministry within this period.

It has been regulated that the mechanical installed capacity increase requested for generation facilities that are entitled to receive a letter of invitation to the connection agreement before 12/5/2019 cannot exceed twenty percent of the electrical installed capacity, and the mechanical installed capacity requested for generation facilities that are entitled to receive a letter of invitation to the

connection agreement after 12/5/2019 cannot exceed twice the electrical installed capacity.

Article 19 regulates that the environmental impact assessment, zoning and other permits and approvals required for the generation facilities to be connected to the grid to start investment and the acceptance procedures, from the date of signature of the connection agreement, without prejudice to the provision of the seventh paragraph of Article 30;

- One year for all generation facilities using the distribution transformer of the relevant grid operator,
- Not using the distribution transformer of the relevant network operator,
 - Three years for production facilities based on hydraulic resources,
 - Two years for generation facilities based on other resources.

c) For generation facilities to be connected to the transmission network, the period stipulated for generation facilities with the same qualifications within the framework of the Electricity Market License Regulation published in the Official Gazette dated 2/11/2013 and numbered 28809.

In addition, it is regulated that partial acceptance can also be made, but not less than 10 MWe each time. However, if the power other than the accepted part is not accepted within the period, the connection agreement shall be updated based on the accepted part.

In the case that the system utilization agreement is not signed by the parties within one month following the date of the start of commercial operation of the facility in the generation facilities whose acceptance is completed and commissioned, the energy produced by the relevant grid operator until the disconnection of the generation facility from the grid is considered to be produced by the designated supply company and given to the system and taken into consideration as a free contribution to YEKDEM. The system usage fee to be incurred for the amount of energy considered as free contribution to YEKDEM within the scope of this paragraph shall be paid to the relevant grid operator through the responsible supply company and no invoice shall be notified to the unlicensed generation facility owners for the energy considered as free contribution to YEKDEM.

Article 37 regulates that in the event that a legal entity that owns an unlicensed generation facility wishes to merge under its own legal entity or under another legal entity, together with all its assets and liabilities, the relevant grid operator shall notify the merger or demerger information to the responsible supply company.

Provisional Article 10 regulates that the one-year period under Article 17 shall also apply to the call letters for existing connection agreements in terms of their remaining duration. However, if this period is less than one hundred and eighty days, the remaining period will be applied as one hundred and eighty days.

Presidential Decree No. 8484: With the Presidential Decree No. 8484 published in the Official Gazette dated 21.05.2024 and numbered 32552, it has been decided to determine the rate of late payment increase in the first paragraph of Article 51

of the Law No. 6183 on the Procedure for Collection of Public Receivables as 4.5% to be applied separately for each month. Prior to the amendment, this rate was applied as 4%.

Presidential Decree No. 8485: With the Presidential Decree No. 8485 published in the Official Gazette dated 21.05.2024 and numbered 32552, it has been decided to apply the legal interest rate regulated in Article 1 of the Law No. 3095 on Legal Interest and Default Interest as 24% per annum, effective from 01.06.2024.

Prior to the amendment, this rate was stipulated as 9% per annum effective from 01.01.2006.

General Communiqué on Collection (Serial: C Sequence No: 8): According to the Communiqué published by the Ministry of Treasury and Finance in the Official Gazette dated 21.05.2024 and numbered

32552, the deferral interest rate, which is applied as 36% per annum within the scope of the authority granted to the Ministry by Article 48 of the Law No. 6183 on the Procedure for Collection of Public Receivables, has been determined as 48% per annum as of the publication date of the Communiqué.

Energy Market Regulatory Board's Board Decision dated 30.05.2024 and numbered 12667: With the Board Decision No. 12667 published in the Official Gazette dated 01.06.2024 and numbered 32563, it has been decided to revise the YEKDEM cost foreseen per unit energy amount supplied for May 2024 and beyond within the scope of Articles 13/4 and 14/2 of the Regulation on Certification and Support of Renewable Energy Resources as follows;

Months	2024 Foreseen YEKDEM Cost (TL/MWh)
May	472.39
June	517.14
July	385.20
August	368.02
September	411.89
October	469.49
November	421.17
December	421.16

LEGAL DEVELOPMENTS

Energy Market Regulatory Board's Board Decision dated 30.05.2024 and numbered 12665: Within the scope of the Board Decision No. 12665 published in the Official Gazette dated 01.06.2024 and numbered 32563 and the Communiqué on Regulation of Market Operating Income published in the Official Gazette dated 02.12.2015 and numbered 29570 it has been decided;

- a) To add an additional amount of 486.849.672-TL to the market operating income ceiling of EPIAŞ for the year 2024 approved by the Board Decision dated 21.12.2023 and numbered 12280 as additional market operating income ceiling,
- b) Unit fees to be updated and implemented by EPIAŞ as of 01.06.2024 in order to meet the updated revenue ceiling in the markets operated by EPIAŞ.

Constitutional Court Decision dated 07.12.2023, numbered 2018/117E., 2023/212 K.: In the Decision published in the Official Gazette dated 04.06.2024 and numbered 32566; annulment of certain legislative amendments made by the Decree Law No. 703 dated 02.07.2018 on the Amendment of Certain Laws and Decree Laws in order to Ensure Compliance with the Amendments to the Constitution ("Decree Law No. 703") was requested. In this context;

- Paragraphs (7), (8), (9), (10), (11), (12), (13) and (14) added to Article 26 of the Electricity Market Law No. 6446 regulating the rights and obligations of EÜAŞ by the Decree Law No. 703 are annulled by a majority vote on the grounds that they do not aim compliance with the amendments made to the Constitution and are contrary to the abrogated Article 91 of the Constitution. "Rights and obligations of EUAS ARTICLE 26 – ... (9) (Annex: 2/7/2018-DL-703/9 art.) EUAS sells electricity from wholesale tariffs to authorized supply companies for consumers whose tariffs are subject to regulation.

(10) (Annex: 2/7/2018-DL-703/9 art.) Prices, terms and conditions regarding the sale of electrical energy to assigned supply companies for consumers whose tariffs are not subject to regulation by EÜAŞ are determined freely between the parties.

(11) (Annex: 2/7/2018-DL-703/9 art.) The suppliers authorized by the Board as the last welding supplier are obliged to procure from EUAS the ratio of the electrical energy provided for the customers within the scope of the last resource supplier to be determined by the Board every year.

(13) (Annex: 2/7/2018-DL-703/9 art.) In the event that EUAS cannot meet the amount of electrical energy specified in the ninth, eleventh and twelfth paragraphs within the scope of the existing contracts, it shall procure it from the companies operating domestic coal-fired electricity generation plants. Other procedures and principles including the amount, duration and price determination related to the said supply shall be determined by the Ministry. ..."

It has been unanimously decided that the annulment provisions shall enter into force 12 (twelve) months after the publication of the Decision in the Official Gazette.

Regulation Amending the Electricity Market Connection and System Utilization Regulation: With the Amending Regulation published in the Official Gazette dated 25.06.2024 and numbered 32583, the phrase "two" in the second paragraph of Article 25 of the Electricity Market Connection and System Utilization Regulation published in the Official Gazette dated 28/1/2014 and numbered 28896 has been amended as "1,3".

"(Amended: OG-29/7/2023-32263) The user pays the amount in the notification to TEİAŞ or the distribution company within fifteen days following the day of notification of the payment notification. For the period of delay in payment, the late payment surcharge calculated according to Article 51 of the Law on Procedure for Collection of Public

Receivables dated 21/7/1953 and numbered 6183 shall be applied. This rate shall be applied two "1.3" times for transmission system users."

The amendment entered into force as of the date of publication.

Energy Market Regulatory Board's Board Decision dated 27.06.2024 and numbered 12716: With the Board Decision No. 12716 published in the Official Gazette dated 29.06.2024 and numbered 32587, the fifth paragraph of the provisional Article 1 of the Procedures and Principles for Determining Minimum and Maximum Price Limits in the Day-Ahead Market and Balancing Power Market has been amended.

"(5) From the effective date of this paragraph until a new decision is taken by the Board; minimum price limits are applied as 0 TL/MWh and maximum price limits are applied as 2.700 3.000 TL/MWh in the relevant markets. During this implementation period, the provisions of the second paragraph of Article 4 of these Procedures and Principles shall not apply."

The amendment entered into force on 1/7/2024.

Energy Market Regulatory Board's Board Decision dated 27.06.2024 and numbered 12719: With the Board Decision No. 12719 published in the Official Gazette dated 29.06.2024 and numbered 32587, with the Board Decision No. 12719 published in the Official Gazette dated 29.06.2024 and numbered 32587, it was decided that the distribution system users by the distribution companies and the non-eligible consumers by the authorized supply companies and the low-consumption consumers defined within the scope of the Communiqué on Regulation of the Last Source Supply Tariff published in the Official Gazette dated 20.01.2018 and numbered 30307.2018 dated 20.01.2018 and numbered 30307 published in the Official Gazette dated 20.01.2018 and numbered 30307, it was decided to approve the tariff tables to be applied as of 01.07.2024 to the low consumption consumers defined within the scope of the Communiqué on the Regulation of the End Source Supply Tariff and the tariff table to be applied as of 01.07.2024 to the consumers who have chosen the Green Tariff by the authorized supply companies.

The activity-based tariff table published by the Enerji Market Regulatory Board is as follows:

Activity Based Tariffs Approved by EMRA and Applicable as of July 1, 2024											
	1/7/2024	Activity Based Consumer Tariffs (kr/kWh)					Total Tariffs Excluding Power Fee (kr/kWh)				
Transmission System Users	Transmission System Users Receiving Energy from the Incumbent Supply Company	Retail Single Time Energy Fee	Retail Daytime Energy Fee	Retail Peak Energy Fee	Retail Night Energy Fee	Distribution Fee	Single Time	Daytime	Peak	Night	
	Consumer		312.4942	316.4941	507.6545	162.2084	0.0000	312.4942	316.4941	507.6545	162.2084
Distribution System Users	Distribution System Users	Retail Single Time Energy Fee	Retail Daytime Energy Fee	Retail Peak Energy Fee	Retail Night Energy Fee	Distribution Fee	Single Time	Daytime	Peak	Night	
	Medium Voltage						Medium Voltage				
	Double Term						Double Term				
	Industry	274.2853	278.1487	462.8456	129.0797	60.2673	334.5526	338.4160	523.1129	189.3470	
	Public and Private Services Sector and Other	306.6641	310.2889	517.9165	145.0883	93.9251	400.5892	404.2140	611.8416	239.0134	
	Residence	151.8262	155.3345	283.1156	53.1505	93.0324	244.8586	248.3669	376.1480	146.1829	
	Agricultural Activities	200.9917	203.5594	350.1303	86.4353	77.3544	278.3461	280.9138	427.4847	163.7897	
	Lighting	311.4197				90.1476	401.5673				
	Single Term	Single Term									
	Industry	284.7019	288.7020	479.8624	134.4163	66.5704	351.2723	355.2724	546.4328	200.9867	
	Public and Private Services Sector and Other	306.0686	309.6935	517.3211	144.4918	117.1606	423.2292	426.8541	634.4817	261.6524	
	Residence	145.9788	149.4873	277.2666	47.3019	114.8713	260.8501	264.3586	392.1379	162.1732	
	Agricultural Activities	198.2802	200.8482	347.4192	83.7224	96.3144	294.5946	297.1626	443.7336	180.0368	
	Lighting	311.8006				112.4522	424.2528				
	Low Voltage	Low Voltage									
Single Term	Single Term										
Industry	267.5627	271.3632	453.0836	124.6970	102.9981	370.5608	374.3613	556.0817	227.6951		
Public and Private Services Sector and Other (30 kWh/day and below)	246.3661	310.4593	518.0865	145.2583	139.5844	385.9505	450.0437	657.6709	284.8427		
Public and Private Services Sector and Other (Above 30 kWh/day)	306.8350	310.4593	518.0865	145.2583	139.5844	446.4194	450.0437	657.6709	284.8427		
Residence (8 kWh/day and below)	49.4065	142.6273	270.4077	40.4418	136.5179	185.9244	279.1452	406.9256	176.9597		
Residence (Above 8 kWh/day)	139.1181	142.6273	270.4077	40.4418	136.5179	275.6360	279.1452	406.9256	176.9597		
Martyr Families and War Veterans	6.1590				82.8453	89.0043					
Agricultural Activities	195.0087	201.7331	344.1485	80.4509	114.6937	309.7024	316.4268	458.8422	195.1446		
Lighting	314.2697				133.6912	447.9609					
General Lighting	389.0440				133.6912	522.7352					

LEGAL DEVELOPMENTS

The green tariff table published by the Board Decision is as follows:

Green Tariff Excluding Taxes, Funds and Shares to be applied as of July 1, 2024, approved by EMRA						
Transmission System Users						
Green Energy Fee kr/kWh						
314.2697						
Distribution System Users						
Consumers Receiving Energy from the Incumbent Supply Company						
	Green Energy Fee	Distribution Fee	Capacity		Green Energy + Distribution	Reactive Energy
			Power Fee	Power Overrun Fee		
	kr/kWh	kr/kWh	kr/Month/kW	kr/Month/kW	kr/kWh	kr/kWh
Medium Voltage						
Double Term						
Industry	314.2697	60.2673	2,002.8284	4,005.6568	374.5370	196.6895
Public and Private Services Sector and Other	314.2697	93.9251	3,224.5379	6,449.0758	408.1948	196.6895
Residence	314.2697	93.0324	3,144.6224	6,289.2448	407.3021	
Agricultural Activities	314.2697	77.3544	3,111.8866	6,223.7732	391.6241	196.6895
Lighting	314.2697	90.1476	3,205.1390	6,410.2780	404.4173	
Single Term						
Industry	314.2697	66.5704			380.8401	196.6895
Public and Private Services Sector and Other	314.2697	117.1606			431.4303	196.6895
Residence	314.2697	114.8713			429.1410	
Agricultural Activities	314.2697	96.3144			410.5841	196.6895
Lighting	314.2697	112.4522			426.7219	
Low Voltage						
Single Term						
Industry	314.2697	102.9981			417.2678	196.6895
Public and Private Services Sector and Other	314.2697	139.5844			453.8541	196.6895
Residence	314.2697	136.5179			450.7876	
Agricultural Activities	314.2697	114.6937			428.9634	196.6895
Lighting	314.2697	133.6912			447.9609	

Regulation Amending the Electricity Market License Regulation: With the Regulation Amending the Electricity Market License Regulation published in the Official Gazette dated 17.08.2024 and numbered 32635, the following sentences were added to the first paragraph of Article 57 of the Electricity Market License Regulation to come before the last sentence,

"However, changes in the shareholding structure planned to be made other than subparagraphs (a), (b), (ç), (d), (f), (j) and (k) are subject to Board approval each time. In this context, in the event of a change in the shareholding structure without the approval of the Board, the pre-license in question shall be cancelled within the framework of the third paragraph of Article 6 of the Law."

Energy Market Regulatory Board's Board Decision dated 19.09.2024 and numbered 12891: With the Board Decision No. 12891 published in the Official Gazette dated 21.09.2024 and numbered 32669, regarding the transmission surcharge to be applied in 2025, effective from 01.01.2025, pursuant to subparagraph (h) of the seventh paragraph of the seventh paragraph of Article 5 of the Law No. 4628 on the Organization and Duties of the Energy Market Regulatory Authority, subparagraph (e) of paragraph (A) of the first paragraph of Article 10 and the third paragraph of Article 7 of the Electricity Market Tariffs Regulation, the transmission surcharge to be applied in 2025 has been determined as 0.5% (five per thousand) of the transmission tariff of the Turkish Electricity Transmission Corporation. Transmission surcharges are calculated monthly by the Turkish Electricity Transmission Joint Stock Company and deposited to the Energy Market Regulatory Authority account until the 25th of the following month.

Energy Market Regulatory Board's Board Decision dated 26.09.2024 and numbered 12899: With the Board Decision No. 12899 published in the Official Gazette dated 28.09.2024 and numbered 32676, due to the ongoing effects of the Kahramanmaraş-centred earthquakes dated February 6, 2023, pursuant to Article 140 of the Electricity Market Balancing and Settlement Regulation, until 31.03.2025; Akedaş Elektrik Dağıtım A.Ş., Dicle Elektrik Dağıtım A.Ş., Fırat Elektrik Dağıtım A.Ş., Toroslar Elektrik Dağıtım A.Ş. and the authorized supply companies operating in the said distribution regions;

The categories of the incumbent supply companies within the scope of subparagraphs (a), (b), (c) and (ç) of the second paragraph of Article 17 of the Regulation,

Supply companies in which Organized Industrial Zones are directly or indirectly shareholders, It has been decided that the amounts included in the advance payment notifications specified in the first paragraph of Article 132/Ç of the Regulation, which are obliged to be paid for the related invoice period, shall be postponed until the invoice due date for the relevant invoice period, and no default interest shall be applied to the market operator and market participant during the period of postponement of advance payments. The decision entered into force on 01.10.2024.

Personal Data Protection Law: With the Law No. 7499 on the Amendment of the Code of Criminal Procedure and Certain Laws ("Law") published in the Official Gazette dated March 12, 2024 and numbered 32487, amendments were made to the Law No. 6698 on the Protection of Personal Data Law ("PPDL"), especially in the areas of special categories of personal data and transfer abroad. With the amendments made in Article 9 regulating the transfer abroad, in the presence of the conditions in Articles 5 and 6 of the Law on the processing of personal data and sensitive personal data, by the data controller and the data processor,

- Adequacy decision:** If there is an adequacy decision to be made by the Personal Data Protection Board in terms of country, sector, international organizations, it can be transferred in accordance with this decision, in the absence of an adequacy decision, transfer based on appropriate safeguards will be in question.
- Transfer based on appropriate safeguards:** Provided that one of the conditions for data processing set forth in Art. 5 and Art. 6 of the PPDL exists, and provided that the data subject has the opportunity to exercise his/her rights and to apply for effective remedies in the country of transfer, the data may be transferred abroad if one of the appropriate safeguards is provided by the transfer parties. These cases are:

a) The existence of an agreement that does not constitute an international contract between public institutions and organizations or international organizations abroad and public institutions and organizations or professional organizations in the nature of public institutions in Turkey and the Board's permission for the data transfer,

b) The companies within the group of undertakings engaged in common economic activity and binding corporate rules approved by the Board for these companies,
c) Existence of a standard contract announced by the Board,
d) The existence of a written commitment in accordance with the specified conditions and the Board's authorization of the data transfer.

- Incidental transfer: In cases where the specified conditions cannot be met, it may be transferred abroad only in the presence of one of the following situations, provided that it is incidental. Data transfers that are not regular, occur only once or a few times, are not continuous and are not in the ordinary course of business are incidental.
 - The data subject gives explicit consent to the transfer, provided that he/she is informed about the possible risks.
 - The transfer is mandatory for the performance of a contract between the data subject and the data controller or for the implementation of pre-contractual measures taken upon the request of the data subject.
 - The transfer is necessary for the establishment or performance of a contract between the data controller and another natural or legal person for the benefit of the data subject.
 - The transfer is mandatory for a superior public interest.
 - The transfer of personal data is mandatory for the establishment, exercise or protection of a right.
 - The transfer of personal data is mandatory for the protection of the life or physical integrity of the person or another person who is unable to disclose his consent due to actual impossibility or whose consent is not legally valid.
 - Transfer from a registry open to the public or persons with legitimate interests, provided that the conditions required to access the registry in the relevant legislation are met and the person with a legitimate interest requests it.

Following the aforementioned legislative amendment, the Regulation on the Procedures and Principles Regarding the Transfer of Personal Data Abroad was published in the Official Gazette dated July 10, 2024 and numbered 32598, setting out the details regarding the data transfer abroad, and the Standard Contract Texts were published by the Personal Data Protection Board on the same day.

LEGAL DEVELOPMENTS

Regulation Amending the Electricity

Market License Regulation: With the Regulation Amending the Electricity Market License Regulation published in the Official Gazette dated October 10, 2024 and numbered 32688, Article 57 of the Electricity Market License Regulation has been amended as below. The Regulation entered into force as of the date of publication. “However, direct share changes planned to be made in other subparagraphs except for subparagraphs (a), (b), (ç), (d), (f), (j) and (k) and indirect shareholding structure changes of 10% and above are subject to the approval of the Board each time.”

Amendment to the Methodology on Technical Requirements for Bids Submitted in the Intraday Market:

With the announcement made on EPIAŞ’s official website on 14.10.2024, it was announced that the following amendments and new articles were added to the Method on Technical Requirements of Bids Submitted in the Intraday Market with the General Manager’s Approval dated October 14, 2024 and numbered 13171 and that the said amendments will enter into force on November 15, 2024.

“Bid matching rate

ARTICLE 3- (1) Bid matching rate (BMR) is the value calculated by dividing the number of bids submitted, updated, deactivated and canceled by a market participant from the opening of the relevant contract until the contract closing time by the number of matches realized by the same market participant in the relevant contract. (2) In the intraday market, BMR, offer matching rate is applied as 1.000 on contract basis. When the said ratio is exceeded, no new bid submission or update operation can be performed for the relevant contract. If the bids submitted before such blocking process are matched, operations can be performed bids can be submitted and updated until the BMR value is 1.000 again. (3) Decimal values are rounded down in the calculation of BMR. Offer matching rate. (4) Detailed information on the number of bid submissions and updates is available on the Market Operator’s corporate website and in the user guide published in the MMS.

Timeframe for submitting and updating bids

ARTICLE 4- (1) Bid submission and update time interval (BUI) is the minimum time interval between each bid submission, update, deactivate and cancellation operations. (2) In the intraday market, the BUI bid submission and update time interval is applied as 100 milliseconds. New offer submission or update Operations mentioned in the first paragraph cannot be performed within a shorter period of time than the said time interval. (3) In the event that bid submission and updates operations are carried out in a way to damage the operation of the system, the relevant participants shall be notified to the Authority.

Number of bid updates

ARTICLE 4/A - (1) Bid update count (BUT) is the sum of the number of bids submitted, updated, inactive and canceled by a market participant on a contract basis. (2) BUT is calculated every day starting from 00:00 until 23:59:59 and reset at the end of each day. (3) In the intraday market, the upper limit of BUT is applied as 10.000. (4) For any contract, until the BUT reaches 10,000, the BUI is applied as 100 milliseconds, and when it reaches 10,000, the BUI is applied as 5 seconds until the end of the relevant day.”

Change in Collateral Calculation Method:

With the announcement made on EPIAŞ’s official website on 14.10.2024, it has been announced that the following paragraph numbered nine has been added to Article 8 titled Risk Collateral in the Collateral Calculation Method with the General Manager’s Approval dated October 14, 2024 and numbered 13171 and that the said amendment will enter into force on November 15, 2024.

“Risk collateral

ARTICLE 8- In case the projected imbalance amount calculated under this article is negative; if the projected imbalance amount is equal to or greater than 35 percent of the sum of the sales amounts of the relevant day and the total consumption value determined on

a daily basis and to which the regional seasonality coefficient is applied in the direction of increase and/or decrease, the daily risk amount calculated for the relevant day under subparagraph (ç) of the second paragraph shall be increased by fifty percent.”

Energy Market Regulatory Authority’s Board Decision dated 07.11.2024 and numbered 12987:

With the Board Decision No. 12987 published in the Official Gazette dated 09.11.2024 and numbered 32716, it was decided to determine the fifth implementation period as 1/1/2026 (inclusive) - 31/12/2030 (inclusive) for the parameters to be valid for the income/ tariff regulations of the distribution companies operating in the electricity market and the authorized supply companies.

Energy Market Regulatory Authority’s Board Decision dated 07.11.2024 and numbered 12993:

With the Board Decision No. 12993 published in the Official Gazette dated 09.11.2024 and numbered 32716, regarding the requests for approval of the share transfers planned to be made within the scope of subparagraph (i) and in case of the arrival of a new indirect partner with a change of 10% or more within the scope of subparagraph (c) of the first paragraph of Article 57 of the Electricity Market License Regulation (“Regulation”);

- Within the scope of the share transfer in question, the paid-in capital of the pre-license holder legal entity shall be increased by 25% of the total investment amount related to the main source within 6 (six) months from the date of notification of the Board Decision regarding the approval, in addition to the existing paid-in capital and regardless of the share transfer rate, and the relevant information and documents shall be submitted to the Authority,
- In the calculation of the amount of paid-in capital within the scope of Article 1, the following amounts shall be taken as basis as unit investment amounts on the basis of resources related to the main source,

Main Resource Type	Unit Investment Amounts (TL/MWm)
Wind	35,000,000
Sun	18,000,000
Hydraulics	35,000,000
Geothermal	50,000,000
Biomass	50,000,000
Natural Gas/ LPG	18,000,000
Fuel oil/Naphtha	18,000,000
Coal	35,000,000
Others	50,000,000

- To document that the amounts determined within the framework of the above-mentioned capital increase in relation to the applications made within this scope are provided by using foreign resources,
- In the event that the share transfer subject to the approval is realized, if the capital increase obligation in question is not realized within the specified period, the approval in question shall be deemed invalid and the preliminary license and/or preliminary licenses in question shall be cancelled within the scope of the first paragraph of Article 57 of the Regulation,
- The increased paid-in capital amount shall not be reduced below the specified amount until the generation license is obtained, otherwise, action shall be taken within the scope of Article 4,
- Within the scope of subparagraph (g) of the first paragraph of Article 57 of the Regulation, it has been decided to take action within the scope of this Board decision for the share transfers to be made to foreigners within the framework of the changes to be made in the shareholding structure of the legal entities holding pre-license.

Communiqué Amending the Communiqué on the Regulation of the Last Resort Supply Tariff:

With the Communiqué Amending the Communiqué on the Regulation of the Last Resort Supply Tariff published in the Official Gazette dated November 16, 2024 and numbered 32724, the third and sixth paragraphs of Article 6 of the Communiqué have been amended as follows and the following seventh paragraph has been added to the same article; and it has been regulated that the said amendment will enter into force as of 01.01.2025 and the third paragraph of Article 8 of the Communiqué has been amended and an addition has been made to the fifth paragraph; and the amendments in Article 8 will enter into force on 16.11.2024, the date of publication of the Communiqué in the Official Gazette.

“Last resort supply tariff for high consumption consumers ARTICLE 6

(3) The last resort supply tariff for high consumption consumers cannot be lower than the approved single-time retail sales tariff for consumers who do not qualify as eligible consumers in the relevant period. In consumer groups where tiered tariffs are applied, the higher tiered tariff is taken as basis for this comparison.

(6) YEKDEMd value is calculated according to equation (2) below:

$$YEKDEM_d = \frac{\sum_{i=1}^n g_i \times YEKDEM_i}{\sum_{i=1}^n g_i} \quad (2)$$

YEKDEMi: indicates the estimated YEKDEM unit price predicted by the Board for the month i within the d billing period
 gi: indicates the number of days in the d invoice period calculated according to the curtailment application in the month in which the YEKDEMi price is valid
 n: indicates the number of calendar months included in billing period d,”

(7) Differences arising from the forecasted and actual YEKDEM price shall be taken into account in the tariff arrangements of the last resort supplier.

“Other provisions regarding the application of the last resort supply tariff ARTICLE 8 -

(3) The end-source supply tariff determined for high consumption consumers shall start to be applied as of the first day of the third calendar month following the calendar month in which the consumption amount determining this consumer group is reached in the previous calendar year or in the current year for the consumers included in the high consumption consumer group for the first time. Among the consumers who are included in the high consumption consumer group for the first time, those connected to the transmission voltage level shall be informed by the authorized supply companies by obtaining the necessary information from TEİAŞ, and those connected at the distribution voltage level shall be informed by the distribution companies via permanent data storage or in writing by sending a text message and/or e-mail within 15 days from the date it is understood that the consumer has reached the high consumption amount. For the consumers who were previously included in this scope and who are again included in the high consumption consumer group, the said price shall be applied immediately and a notification shall be sent via permanent data storage device or writing within 15 days.

(5) While determining the status of being included in the high consumption consumer group, the energy consumed by the consumer at a place of use pursuant to the contract made on his/her behalf shall be taken into consideration. “In consumer or consumer group changes affecting last resort supply, license holder legal entities are authorized to request the necessary information and documents in order to prevent collusive transactions.”

LEGAL DEVELOPMENTS

Energy Market Regulatory Authority's Board Decision dated 07.11.2024 and numbered 12989:

With the Board Decision No. 12989 published in the Official Gazette dated 16.11.2024 and numbered 32724, it has been decided to approve the issues regarding the consumption amount and the coefficient determined by the Board in Articles 5 and 6 of the Communiqué on the Regulation of the Last Resort Supply Tariff as set out below and to send it to the Presidency to be published in the Official Gazette.

ARTICLE 1- The consumption amount in the third paragraph of Article 5 of the Communiqué on the Regulation of the Last Resort Supply Tariff is 5 thousand kWh/year for the year 2025 as of 1/2/2025 for public institutions and organizations, local administrations and detached buildings, apartment buildings and independent sections within apartment buildings, housing cooperatives and housing estates used as dwellings, and heating, elevator, hydrophore, stair automatics, caretaker's apartment and similar common use places of these places measured by separate meters for the year 2025, which are within the scope of the residential consumer group; It is applied as 100 million kWh/year for temporary shelter centres established by the T.C. Ministry of Interior Disaster and Emergency Management Presidency, facilities used for drinking water supply and distribution of village legal entities and other consumers and agricultural activities consumer group; 15 thousand kWh/year for the remaining consumer groups.

ARTICLE 2- The consumption amount determined by Article 1 of the Board Decision dated 26/10/2023 and numbered 12158 shall continue to be applied until 31/1/2025.

ARTICLE 3- The KBK in the fifth paragraph of Article 6 of the Communiqué on the Regulation of the Last Source Supply Tariff shall continue to be applied as 1.0938 as of 1/1/2025.

ARTICLE 4- This Decision shall enter into force on 1/1/2025.

ARTICLE 5- This Decision shall be executed by the President of the Energy Market Regulatory Authority.

General Communiqué on Tax Procedure Law (Sequence No: 574):

With the Communiqué published by the Revenue Administration in the Official Gazette dated 27.11.2024 and numbered 32735, the revaluation rate for the year 2024 was determined as 43.93%.

Regulation on Aggregation Activity in the Electricity Market: The Regulation on Aggregation Activities in the Electricity Market ("Regulation") was published in the Official Gazette dated December 17, 2024 and numbered 32755 and entered into force on 01.01.2025.

Briefly, the matters regulated by the Regulation are as follows:

The Regulation aims to regulate the procedures and principles regarding the activities that aggregators may carry out in the electricity market and the transactions to be carried out within the scope of aggregation activities.

The Regulation covers the procedures and principles regarding the determination of the participation of aggregators in the organized wholesale electricity market and bilateral agreement activities within the scope of the relevant legislation, and the duties, authorities and responsibilities of the parties regarding the transactions to be carried out within the scope of aggregation activities in the electricity market.

The Regulation defines aggregator as "a legal entity holding an aggregator license or a supply license, provided that it is included in the license, which has signed an agreement with one or more network users to carry out aggregation activities in the electricity market on behalf of such network users," aggregation as "the market activity carried out by the aggregator within the scope of combining and operating the production and/or consumption of one or more network users" and aggregation service agreement, "The commercial agreement between aggregators and legal entities holding generation licenses, eligible consumers, legal entities holding self-contained storage facilities and real persons or legal entities operating within the scope of the Regulation on Unlicensed Electricity Generation in the Electricity Market, subject to the provisions of private law, for the

aggregators to buy and sell electrical energy and/or capacity on behalf of such network users and to participate in the procurement processes related to ancillary services and not subject to the approval of the Board."

Aggregation activities in the electricity market may be carried out by legal entities holding an aggregator license or a supply license, provided that it is included in the license.

It is regulated that if the aggregator portfolio includes electricity generation facilities, the total installed capacity of licensed and unlicensed electricity generation facilities in operation can be maximum 2000 MW. It is regulated the share of the total installed capacity of unlicensed electricity generation facilities in the aggregator portfolio within the upper limit cannot exceed 500 MW.

Regulation Amending the Electricity Market License Regulation: The Regulation Amending the Electricity Market License Regulation ("Regulation") was published in the Official Gazette dated December 17, 2024 and numbered 32755 and entered into force on the date of publication. Briefly, the following regulations have been introduced by the Regulation:

The definitions of "Aggregator," "Aggregation" and "Aggregation service agreement" have been added. Aggregation was added to the list of activities subject to licenses and aggregation license was added to the license types.

It is regulated that the minimum capital required for aggregation license applications will be determined by a Board decision.

It is regulated that the issues regarding the capital adequacy to be provided by legal entities holding distribution licenses and incumbent supply companies during their licenses period will be determined by a Board decision.

It is regulated that legal entities holding supply licenses, other than incumbent supply companies, may engage in aggregation activities in the electricity market, provided that it is included in their license.

It is regulated that the incumbent supply company will provide services using a different physical environment and information systems infrastructure than the distribution companies.

The direct or indirect acquisition by a natural or legal person of shares representing ten percent or more of the capital for legal entities holding licenses whose tariffs are subject to regulation, and shares representing five percent or more of the capital for publicly traded companies, and share transfers or other transactions that result in a change of control in the shareholding structure of the legal entity, regardless of the above-mentioned capital share changes, were subject to the approval of the Board. With the amendment, share transfers in the context of inheritance transactions have been excluded.

Rights and obligations of the aggregator license holder have been regulated.

It is regulated that the aggregator cannot engage in wholesale activities, related to the aggregation activity within the scope of the aggregator license or the supply license, provided that it is included in the license. However, it is regulated that the purchases and sales made in order to balance its portfolio will not be considered within this scope.

It is regulated that applications for aggregator licenses to be made to the Authority regarding aggregation activities in the electricity market and amendment applications regarding the inclusion of aggregation activities in the supply license will be received as of 1/1/2025.

Regulation Amending the Electricity Market Balancing and Settlement Regulation: The Regulation Amending the Electricity Market Balancing and Settlement Regulation ("Regulation") was published in the Official Gazette dated December 17, 2024 and numbered 32755 and entered into force on 01.01.2025.

The Regulation added the definitions of "Balancing zone," "Minimum stable generation level," "Aggregator" and "Aggregation." Aggregator license holder was added to the market participants. Registration of legal entities holding aggregator licenses in the futures electricity market was regulated. It is regulated that legal entities holding aggregator licenses and legal entities whose aggregation activity is included in the supply license cannot be a member of the group responsible for balance or a party of the group.

The following additions have been made to the settlement-based export-draw units:

- The aggregation of unlicensed electricity generation facilities that have completed their ten-year purchase guarantee and that can be aggregated on a resource basis from the unlicensed electricity generation facility or facilities that can be aggregated on a resource basis and formed on a balancing zone basis.
- The community formed on a balancing zone basis for the participation of licensed generation facilities without balancing units in the balancing power market and/or ancillary services within the scope of aggregation activities.
- The community formed on the basis of balancing region for the participation of consumption facilities in the balancing power market and/or ancillary services within the scope of aggregation activity by bringing them together, provided that the criteria determined by TEİAŞ are met.

The following communities have been added to the generation facilities that are exempt from the obligation to be a balancing unit and can be a balancing unit if requested by the relevant market participant and approved by the System Operator:

- A community of licensed electricity generation facilities requested by the aggregator on a balancing zone basis and capable of independently receiving and/or shedding load,
- A community of unlicensed electricity generation facilities that are requested by the aggregator on a balancing zone basis and can independently take and/or shed load,
- A community of consumption facilities requested by the aggregator on the basis of balancing zone and which can independently take and/or shed load.

Registration processes and default status within the scope of aggregation activity have been regulated.

The imbalance rate in the fifth paragraph of Article III for the groups responsible for the balance formed by the legal entities holding distribution licenses and the responsible supply companies in their regions by coming together is regulated to be applied as 100% until 1/1/2027.

Regulation Amending the Electricity Market Ancillary Services Regulation: The Regulation Amending the Electricity Market Ancillary Services Regulation ("Regulation") was published in the Official Gazette dated December 17, 2024 and numbered 32755. Some provisions of the Regulation entered into force on the date of publication and some provisions will enter into force on 01.03.2025.

In the Regulation, regulations on the definitions related to aggregation activities have been added. Regulations have been made on ancillary service units and registration rules. Calculation methodologies for remuneration have been regulated.

Regulation Amending the Regulation on Storage Activities in the Electricity Market: The Regulation Amending the Regulation on Storage Activities in the Electricity Market was published in the Official Gazette dated December 17, 2024 and numbered 32755 and has entered into force on 01.01.2025.

It is regulated that the amount of energy to be supplied to the system on the basis of the settlement period by electricity generation facilities with storage and generation facilities with an integrated electricity storage unit cannot exceed the amount of generation that can be made with the total electrical installed capacity of the units that have been provisionally accepted based on the main source.

It is regulated that one or more independent electricity storage facilities can be established within the scope of the same supply or aggregator license, provided that they have a supply or aggregator license and their installed capacity is not less than 2 MW.

Regulation Amending the Regulation on Unlicensed Electricity Generation in the Electricity Market: The Regulation Amending the Regulation on Unlicensed Electricity Generation in the Electricity Market ("Regulation") was published in the Official Gazette dated 17 December 2024 and numbered 32755 and entered into force on the date of publication.

LEGAL DEVELOPMENTS

Within the scope of the Regulation, in the event that the illegal consumption of electrical energy belonging to the subscription related to the consumption facility or facilities associated with the production facility under the real or legal persons who have a call letter to the connection agreement and who have signed a connection agreement is detected, the energy produced for the relevant period and the following six invoice periods is subject to the contractual power at the time of detection of the consumption facility where illegal electrical energy is detected, it is accepted that the energy corresponding to the ratio of the total contract power of all associated consumption facilities to the total contract power is produced by the authorized supply company and given to the system, and no payment is made by the market operator and the assigned supply company for the energy corresponding to this ratio for the period specified in this paragraph, and the energy given to the system within this scope will be taken into account as a free contribution to YEKDEM.

The Regulation regulates the participation of unlicensed electricity generation facilities in aggregation activities.

Regulation Amending the Regulation on Renewable Energy Resource Guarantee Certificate in the Electricity Market: The Regulation Amending the Regulation on Renewable Energy Source Guarantee Certificate in the Electricity Market ("Regulation") was published in the Official Gazette dated December 17, 2024 and numbered 32755 and entered into force on 01.01.2025.

In general, with the Amendment Regulation, the rights and obligations of aggregators within the scope of the Regulation have been regulated in the relevant articles.

Regulation Amending the Electricity Network Regulation: The Regulation Amending the Electricity Grid Regulation ("Regulation") was published in the Official Gazette dated December 17, 2024 and numbered 32755 and entered into force on the date of publication.

The definitions of "demand response," "minimum stable generation level (MSUD)," "low frequency mode with limited frequency sensitivity" and "high frequency mode with limited frequency sensitivity" were added to the Regulation. Additions have been made regarding aggregation activities and technical issues have also been amended.

Regulation Amending the Regulation on the Certification and Support of Renewable Energy Sources: The Regulation Amending the Regulation on Certification and Support of Renewable Energy Resources ("Regulation") was published in the Official Gazette dated December 17, 2024 and numbered 32755 and entered into force on 01.01.2025.

Amendments were made to the definitions of the Regulation within the scope of aggregation license. Aggregators were included in the RES support mechanism.

Authorized supply companies are obliged to purchase the surplus electricity supplied to the system by real or legal persons who have established generation facilities based on renewable energy resources within the scope of unlicensed generation in their region and are not included in any aggregator portfolio.

Real or legal persons whose electricity energy produced from renewable energy sources within the scope of Regulation on Unlicensed Electricity Generation in the Electricity Market is within the scope of exempted generation amount, from the date of full or partial commissioning of the generation facilities;

a) The authorized supply companies in whose region they are located for ten years, b) As of the end of the ten-year period, it is regulated that they will benefit from YEKDEM through the aggregator or the responsible supply companies in their region.

In the event that the Board or a judicial decision decides to make a payment to the owner of an unlicensed electricity generation facility, the procedure to be established has been regulated.

Energy Market Regulatory Authority's Board Decision dated 12.12.2024 and numbered 13065: With the Board Decision No. 13065 published in the Official Gazette dated 17.12.2024 and numbered 32755, the eligible consumer limit for 2025 was set as 750 kWh. The decision entered into force as of 01.01.2025.

Energy Market Regulatory Authority's Board Decision dated 21.11.2024 and numbered 13025: With the Board Decision dated 17.12.2024 and numbered 32755 published in the Official Gazette dated 17.12.2024 and numbered 32755, the Decision on the Determination of the Value of KÜPSM and the Coefficients to be used in KÜPSM and KÜPST Calculations pursuant to Article 110 of the Electricity Market Balancing and Settlement Regulation was adopted.

Energy Market Regulatory Authority's Board Decision dated 19.12.2024 and numbered 13101-1: With the Board Decision dated 19.12.2024 and numbered 13101-1 published in the Official Gazette dated 19.12.2024 and numbered 32762, the Fees and Commissions to be Applied to Meet the Electricity Market Operating Revenue Ceiling of EPIAŞ and the Method Statement Regarding the Implementation were accepted and entered into force on the date of publication.

Energy Market Regulatory Authority's Board Decision dated 19.12.2024 and numbered 13102: With the Board Decision dated 19.12.2024 and numbered 13102 published in the Official Gazette dated 24.12.2024 and numbered 32762, the unit fees to be valid in the Electricity Futures Market and Renewable Energy Resource Guarantee System and Market in 2025 have been determined as follows;

• **2025 Unit Prices to be Valid in the Electricity Futures Market:**

Fee Name	Unit Price
Unit transaction fee	3.00 TL/MWh
Annual participation fee	12,500 TL
Unaccepted objection fee	1,000 TL/ piece

• **2025 Unit Fees to be Valid in the Renewable Energy Resource Guarantee System and Market:**

Fee Name	Unit Fee
Unit transaction fee	0.50 TL/MWh
Annual participation fee	2,000 TL

The fees set out in the Decision do not include VAT.

The Decree will enter into force on the date of its publication, effective as of 1/1/2025.

Energy Market Regulatory Authority's Board Decision dated 19.12.2024 and numbered 13107: With the Board Decision dated 19.12.2024 and numbered 13107 published in the Official Gazette dated 24.12.2024 and numbered 32762, the fees for obtaining preliminary license and license, annual license, license renewal, preliminary license and license amendment, preliminary license and license copy issue fees to be applied in the Electricity Market in 2025 were determined.

Energy Market Regulatory Board's Board Decision dated 19.12.2024 and numbered 13115: With the Board Decision No. 13115 published in the Official Gazette dated 24.12.2024 and numbered 32762, the Board Decision on the Amendment of the Board Decision on the Instructions for the Use of the Energy Market Notification System was adopted.

Communiqué on Administrative Fines to be Imposed in 2025 Pursuant to Article 16 of the Electricity Market Law No. 6446: With the Communiqué published in the Official Gazette dated 26.12.2024 and numbered 32764, the administrative fines to be applied according to Article 16 of the Electricity Market Law No. 6446 were increased by 43.93%, which was determined as the revaluation rate for the year 2024, and the administrative fine amounts to be applied in 2025 were determined as follows and entered into force on 01.01.2025.

RELEVANT PROVISION OF ARTICLE 16 OF LAW NO. 6446	ADMINISTRATIVE FINES TO BE IMPOSED IN 2025 (TL)
Subparagraph (a) of the first paragraph of Article 16	8,228,246
Subparagraph (b) of the first paragraph of Article 16	8,228,246
Subparagraph (c) of the first paragraph of Article 16	8,228,246
Subparagraph (ç) of the first paragraph of Article 16	13,165,226
Subparagraph (d) of the first paragraph of Article 16	14,810,867
Subparagraph (e) of the first paragraph of Article 16	16,456,551
Paragraph eight of Article 16	6,531

Determination of Interest Rates to be Applied in Rediscount and Advance Transactions: With the Official Gazette dated 28.12.2024 and numbered 32766, the discount interest rate to be applied by the Central Bank of Turkey for rediscount transactions against bills with a maximum of 3 months to maturity was determined as 48.25 percent per annum and the interest rate to be applied in advance transactions was determined as 49.25 percent per annum, and these rates entered into force on the date of publication.

Board Decision of the Energy Market Regulatory Authority dated 26.12.2024 and numbered 13130-1: With the Board Decision No. 13130-1 published in the Official Gazette dated 28.12.2024 and numbered 32766, it was decided to repeal the Procedures and Principles Regarding Applications for Pre-License and License Transactions approved by the Board Decision dated 27.06.2019 and numbered 8674.

LEGAL DEVELOPMENTS

Board Decision of the Energy Market Regulatory Authority dated 26.12.2024 and numbered 13130-2: With the Board Decision No. 13130-2 published in the Official Gazette dated 28.12.2024 and numbered 32766, the "Procedures and Principles Regarding Applications for Pre-License and License Transactions" was adopted and entered into force on the date of publication.

Energy Market Regulatory Authority's Board Decision dated 26.12.2024 and numbered 13151: With the Board Decision numbered 13151 published in the Official Gazette dated 28.12.2024 and numbered 32766, it has been decided to approve the transmission system usage and system operation tariffs of TEİAŞ to be effective as of 1/1/2025, within the framework of the

Method Statement for Calculation and Implementation of Transmission System System Utilization and System Operation Tariffs for producers and consumers in Annex-1 of the same Board Decision, on the basis of 15 regions in Annex-2 of the same Board Decision, as follows;

Tariff Area	Production		Consumption			
	System Usage		System Operation		System Operation	
	(TL/MW-Year)	(TL/MWh)	(TL/MWh)	(TL/MW-Year)	(TL/MWh)	(TL/MWh)
1	100,485.59	82.90	45.38	234,754.76	64.89	33.93
2	126,142.79	82.90	45.38	201,884.56	64.89	33.93
3	117,971.68	82.90	45.38	215,561.12	64.89	33.93
4	122,443.30	82.90	45.38	207,019.82	64.89	33.93
5	130,361.57	82.90	45.38	198,528.65	64.89	33.93
6	130,937.15	82.90	45.38	209,481.44	64.89	33.93
7	147,346.12	82.90	45.38	182,931.47	64.89	33.93
8	147,764.06	82.90	45.38	190,577.33	64.89	33.93
9	153,221.53	82.90	45.38	185,691.17	64.89	33.93
10	195,066.74	82.90	45.38	153,416.73	64.89	33.93
11	199,458.41	82.90	45.38	158,802.84	64.89	33.93
12	196,472.65	82.90	45.38	155,091.08	64.89	33.93
13	191,683.21	82.90	45.38	166,845.65	64.89	33.93
14	210,873.44	82.90	45.38	141,791.61	64.89	33.93
15	221,310.82	82.90	45.38	137,317.71	64.89	33.93

Energy Market Regulatory Authority's Decision No. 13166 dated 26.12.2024: According to Decision No. 13166 published in the Official Gazette No. 32766 dated 28 December 2024, as per the fifth paragraph of Article 6 of the Communiqué on the Regulation of Last Resort Supply Tariffs, the coefficient (KBK) determined by the Board to be used in the calculation of the last resort supply tariff for high-consumption consumers will be applied as follows starting from 01.01.2025: For the residential consumer group: 1.05 For other consumer groups: 1.0938

Energy Market Regulatory Board's Board Decision dated 26.12.2024 and numbered 13128: With the Board Decision No. 13128 published in the Official Gazette dated 29.12.2024 and numbered 32767, it has been decided the minimum capital amount for legal entities that will apply for Supply License and Aggregation License is determined as follows "TL 28,000,000 (twenty-eight million)" for the Supply License, "TL 50,000,000 (fifty million)" for Aggregator License.

Energy Market Regulatory Authority's Board Decision dated 26.12.2024 and numbered 13129: With the Board Decision No. 13128 published in the Official Gazette dated 29.12.2024 and numbered 32767, the fees for obtaining a license, annual license, license amendment, and license copy issue to be applied in 2025 to enter into force on 01.01.2025, and the annual license fee to be paid in 2026 for the aggregation activity in 2025 have been determined as follows. With the Decision, it has been regulated that the amount equal to the cost of obtaining the aggregator license will be taken as the license amendment fee within the scope of the license amendment applications made to the Authority by the legal entities holding the Supply License to carry out aggregation activities in the electricity market.

License acquisition, license amendment and license copy issue fees for the aggregator license to be applied in 2025;

License Type	Fee Type	Fee (TL)
Aggregator License	License Purchase	10,000,000
Aggregator License	License Amendment Fee	73,450
Aggregator License	License Copy Issue Fee	15,280

Annual license fee to be paid in 2026 for aggregation activity in 2025;

License Type	Fee Criteria	Fee (Kr.)
Aggregator License	Kr. per kWh sold within the scope of aggregation activity, except for sales related to licensed and unlicensed generation facilities included in the Aggregator License Portfolio.	0.015

LEGAL DEVELOPMENTS

Energy Market Regulatory Authority's Board Decision dated 26.12.2024 and numbered 13131-2: With the Board Decision No. 13131-2 published in the Official Gazette dated 29.12.2024 and numbered 32767, the Construction Periods to be taken as Reference in Determining the Pre-License Periods and Facility Completion Date were determined.

Energy Market Regulatory Authority's Board Decision dated 26.12.2024 and numbered 13131-1: With the Board Decision No. 13131-1 published in the Official Gazette dated 29.12.2024 and numbered 32767, it has been decided to repeal the Construction Periods to be taken as Reference in Determining the Pre-License Periods and Facility Completion Date, which entered into force with the Board Decision dated 27/10/2022 and numbered 11329-2.

Energy Market Regulatory Authority's Board Decision dated 26.12.2024 and numbered 13134: With the Board Decision No. 13134 published in the Official Gazette dated 29.12.2024 and numbered 32767, it has been decided to take the amounts in the Decision as the total unit investment amounts on the basis of resources as the basis for the calculation of the capital obligation to be provided in the prelicense and generation license applications for generation activity in the electricity

market and the capital obligation to be provided in the event that a stand-alone electricity storage facility is included in the supply or aggregator license and to determine the collateral amounts to be submitted to the Authority within this scope. In addition, it was decided to repeal the Board Decision dated 27/10/2022 and numbered 11328.

Energy Market Regulatory Authority's Board Decision dated 26.12.2024 and numbered 13135: With the Board Decision No. 13135 published in the Official Gazette dated 29.12.2024 and numbered 32767, the Procedures and Principles Amending the Procedures and Principles Regarding the Offsetting Transactions of Generation and Consumption Facilities Located in Different Distribution or Incumbent Supply Company Regions have been published, and with the amendment made;

- In the third paragraph of Article 11 of the Procedures and Principles, titled "Calculation of the amounts subject to offsetting," the phrase "the lowest relevant tariff price within the relevant group of the relevant VKN in the 'f' billing period" has been amended as follows:
- "Provided that it does not exceed the monthly weighted average market clearing price for the residential subscriber group, for those connected from LV high tier, if the Medium Voltage

and Low Voltage tariff groups are included together, the lowest relevant tariff price from the active energy prices of the LV high tier and other tariff groups within the group for the surplus electrical energy price; for other subscriber groups, the tariff price determined for the relevant tier for the surplus generation corresponding to the lower tier, if any, on the basis of the associated facility, and for the remaining amount, the lowest relevant tariff price from the active energy prices of the LV high tier and other tariff groups within the group for the surplus electricity energy price." and the sentence in the sixth paragraph "In case of different tier tariff prices, the low tier tariff price shall be applied first unless otherwise determined by the Board" has been repealed.

- The Decision entered into force on the date of its publication.

Energy Market Regulatory Authority's Board Decision dated 26.12.2024 and numbered 13156-1: With the Board Decision No. 13156-1 published in the Official Gazette dated 31.12.2024 and numbered 32767 (5th Repeated), it has been decided to apply the guarantee fees as follows as of 1/1/2025 in accordance with the fourth paragraph of Article 26 of the Electricity Market Consumer Services Regulation.

Guarantee Fees	
2025	
Consumer Groups	Unit Price (TL/kW)
Industry and Public and Private Services and Other	569.4
Residential	200.3
Martyrs' Families and Combat Veterans	100.0
Agricultural Activities, Lighting and Other	270.2

Energy Market Regulatory Authority's Board Decision dated 26.12.2024 and numbered 13156-2: With the Board Decision No. 13156-2 published in the Official Gazette dated 31.12.2024 and numbered 32767 (5th Repeated), pursuant to Article 2 of the Procedures and Principles Regarding the Disconnection and Connection Fees adopted by the Board Decision dated 24.12.2020 and numbered 9869, it has been decided to apply the disconnection and connection fees as follows as of 01.01.2025.

Cut-Connection Fees	
2025	
Voltage Level	Fee (TL)
LV	106.8
MV	799.6

Energy Market Regulatory Authority's Board Decision dated 26.12.2024 and numbered 13156-3: With the Board Decision No. 13156-3 published in the Official Gazette dated 31.12.2024 and numbered 32767 (5th Repeated) and pursuant to Article 5 of the Procedures and Principles Regarding Meter Control Fees adopted by the Board Decision dated 07.04.2016 and numbered 6199, it has been decided to apply the meter control fees as of 01.01.2025 as follows.

Meter Control Fees	
2025	
Meter Type	Fee (TL)
Direct connected single phase active or three phase active and/or reactive meters	148.0
Active and/or reactive meters with current transformer and/or voltage transformer	187.5

Energy Market Regulatory Authority's Board Decision dated 26.12.2024 and numbered 13156-4: With the Board Decision No. 13156-4 published in the Official Gazette dated 31.12.2024 and numbered 32767 (5th Repeated), it has been decided that the fees for payment notification and second notification release services received by the authorized supply companies from the distribution companies pursuant to Article 2 of the Board Decision dated 24/12/2020 and numbered 9871 shall be applied as follows as of 1/1/2025.

Payment Notice and Second Notice Release Fees		
2025	Fee (TL/Transaction)	
	LV	HV
Payment Notice Release Fee	0.316	3.16
Second Notification Release Fee	6.34	63.57
Fee to be applied in case of leaving a second notification with the payment notification	0	

Energy Market Regulatory Authority's Board Decision dated 26.12.2024 and numbered 13156-6: With the Board Decision numbered 13156-6 published in the Official Gazette dated 31.12.2024 and numbered 32767 (5th Repeated), it has been decided that the annual operating fee to be collected by the authorized supply companies pursuant to subparagraph (b) of the second paragraph of Article 36 of the Regulation on Unlicensed Electricity Generation in the Electricity Market will be applied as follows for 2025.

Authorized Supply Companies Annual Operating Fee	
2025	
Power Range	Fee (TL/Year)
0-50 kW (included)	0
50-250 kW (included)	5,049.7
250 kW-5 MW (included)	10,099.2
Over 5 MW	20,198.0



LEGAL DEVELOPMENTS

Energy Market Regulatory Authority's Board Decision dated 26.12.2024 and numbered 13156-8: With the Board Decision No. 13156-8 published in the Official Gazette dated 31.12.2024 and numbered 32767 (5th Repeated), it has been decided that the transaction fee to be collected by the relevant network operator and authorized supply companies pursuant to subparagraph (c) of the second paragraph of Article 36 of the Unlicensed Electricity Generation Regulation in the Electricity Market will be applied as follows for 2025.

Transaction Fees	
2025	
Transaction Type	Price (TL)
Share Transfer	0
Other Transactions	3,212.1

Energy Market Regulatory Authority's Board Decision dated 26.12.2024 and numbered 13156-10: With the Board Decision No. 13156-10 published in the Official Gazette dated 31.12.2024 and numbered 32767 (5th Repeated), pursuant to Article 4 of the Board Decision dated 05.10.2016 and numbered 6520, it has been decided that the fee to be charged in case additional data is requested within the scope of the Automatic Meter Reading System will be applied as follows as of 01.01.2025.

OSOS Additional Data Request Fee	
2025	
Meter/ Month	Price (TL)
Meter/ Month	46.9

Energy Market Regulatory Authority's Board Decision dated 26.12.2024 and numbered 13179: With the Board Decision No. 13179 published in the Official Gazette dated 31.12.2024 and numbered 32767 (5th Repeated), it has been decided to approve the YEKDEM projected cost per unit energy amount supplied for 2025 within the scope of the second paragraph of Article 14 of the Regulation on Certification and Support of Renewable Energy Resources as follows.

Months	2025 Projected YEKDEM Cost (TL/MWh)
January	223.14
February	289.39
March	353.65
April	580.92
May	435.68
June	460.71
July	265.22
August	271.96
September	345.01
October	476.43
November	393.59
December	444.24

MAJOR LEGISLATIVE CHANGES IN THE ELECTRIC VEHICLE CHARGING SEGMENT:

Regulation Amending the Workplace Opening and Operation Licences Regulation: Pursuant to the Presidential Decree No. 9016 published in the Official Gazette dated 10.10.2024 and numbered 32688, the Regulation Amending the Regulation on Business Opening and Working Licences entered into force. In this context, the date of compliance with the obligations regarding electric vehicle charging stations in the Regulation has been extended to 31.07.2025.

Regulation Amending the Charging Service Regulation: The deadline for the submission of the document to the Energy Market Regulatory Authority for the charging stations to be added to the charging network by the charging network operators in accordance with the provisions of the Regulation on Workplace Opening and Operation Licences has been extended until 31.07.2025 with the Regulation Amending the Charging Service Regulation published in the Official Gazette dated 23.10.2024 and numbered 32701

Determination of Charging Network Operator Licence Fees: Within the scope of the Energy Market Regulatory Authority (EMRA) Decision dated 19.12.2024 and numbered 13108 published in the Official Gazette dated 24.12.2024 and numbered 32762 and published in the Official Gazette dated 24.12.2024 and numbered 32762, the fees for obtaining, amending and issuing a copy of the licence to be applied as of 01.01.2025 regarding the 'Charging Network Operator Licence' have been determined as follows:

Licence Type	Fee Type	Fee (TL)
Charging Network Operator Licence	Licence Acquisition Fee	1,525,330.00
Charging Network Operator Licence	Licence Amendment Fee	71,220.00
Charging Network Operator Licence	Licence Copy Issuance Fee	15,280.00

Determination of Fees Applicable in the Renewable Energy Resource Guarantee System and Market: Within the scope of the Energy Market Regulatory Authority (EMRA) Decision dated 19.12.2024 and numbered 13102 published in the Official Gazette dated 24.12.2024 and numbered 32762, the unit fees to be valid in the Renewable Energy Resource Guarantee System and Market on 01.01.2025 have been determined as follows. Fees do not include Value Added Tax.

Fee Name	Price
Transaction Fee (Per Unit)	TL 0.50 /MWh
Annual Participation Fee	TL 2,000



LEGAL DEVELOPMENTS

Communiqué on Administrative Fines to be Imposed in 2024 Pursuant to Article 16 of the Electricity Market Law: With the Communiqué published in the Official Gazette dated 26.12.2024 and numbered 32764, the administrative fines regulated in Article 16 of the Electricity Market Law ("Law") were increased by 43.93%, which was determined as the revaluation rate for 2024, and redetermined as follows. The Communiqué entered into force on 01/01/2025.

	ADMINISTRATIVE FINES IMPLEMENTED IN 2024	ADMINISTRATIVE FINES TO BE IMPLEMENTED IN 2025
RELEVANT ARTICLE	(TL)	(TL)
In cases of request for information or on-site inspection by the Board; if it is determined that the requested information is provided inaccurately, incompletely or misleadingly, or if no information is provided at all, or if the opportunity for on-site inspection is not provided, it shall be warned to provide accurate information or to provide the opportunity for inspection within fifteen days. The administrative fine to be imposed on those who continue to violate despite the written warning Paragraph (a) of the First Paragraph of Article 16	5,716,839	8,228,246
In the event that it is determined that there is a violation of the Law, secondary legislation or license provisions, Board decisions and instructions, it shall be warned to eliminate the violation within thirty days or not to repeat it, depending on the nature of the violation, and the administrative fine to be imposed on those who continue or repeat the violations despite the written warning Article 16/1, (b)	5,716,839	8,228,246
Administrative fine to be imposed without the need for warning in case of violation of the provisions of the Law, secondary legislation or license in a way that cannot be corrected after the violation has been made Article 16/1, (c)	5,716,839	8,228,246
Administrative fine to be imposed in case of submitting untrue documents or misleading information about the conditions required for the issuance of a license, or failing to notify the Board of changes in license conditions that will affect the issuance of a license during the license application or license execution Article 16/1, (ç)	9,146,965	13,165,226
In case of violation of the prohibition of affiliate relationship during the license period, the affiliate relationship shall be warned to be corrected within thirty days. Administrative fine to be imposed on those who continue to violate despite the written warning Article 16/1, (d)	10,290,327	14,810,867
In the event that it is determined that there is activity outside the scope of the license in the market, it shall be warned to stop the out-of-scope activity or adverse activity within fifteen days. Administrative fines to be imposed on those who continue their violations despite the written warning Article 16/1, (e)	11,433,719	16,456,551
Except for the inspections of electricity distribution companies, a period of time is given for the elimination of deficiencies related to unlit, out-of-place luminaires and/or poles detected within the scope of general lighting. An administrative fine of five hundred Turkish liras shall be imposed by the Board for each pole or luminaire determined by the determination that the deficiencies are not eliminated within the specified periods, following the notification of the Ministry to the Board. The periods to be given for the elimination of the identified deficiencies and the principles of determining the deficiencies shall be determined by regulation. Administrative fines imposed pursuant to this Law shall be paid within one month following the notification. Article 16/8	4,538	6,531

EVENTS THAT OCCURRED AFTER THE BALANCE SHEET DATE:

The Energy Market Regulatory Authority (EMRA) has approved the pre-license application for solar energy-based storage power plant facility in Ankara province with installed capacity of 70 MWp / 50 MWe, submitted by Enerjisa Müşteri Çözümleri A.Ş., a subsidiary of our Company.

Enerjisa Enerji has issued a TL bond on 03.01.2024, amounting to TL 2,000,000,000 (full digit), with 730 days term, interest with TLREF+4.75% rate, redemption date of 02.01.2026, and with TRSENSA12613 code.

Enerjisa Enerji has issued a TL bond on 08.02.2024, amounting to TL 3,500,000,000 (full digit), with 728 days term, interest with TLREF+4.25% rate, redemption date of 05.02.2026, and with TRSENSA22612 code.

Policies

Anti-Bribery and Anti-Corruption Policy

<https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/1413/antibriberyandanticorruptionpolicy.pdf>

Anti-Retaliation Policy

<https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/411/antiretaliationpolicy.pdf>

Compensation Policy

<https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/410/compensationpolicy.pdf>

Compliance Policy

<https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/409/compliancepolicy.pdf>

Customer Satisfaction Policy

<https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/2721/customersatisfactionpolicy.pdf>

Disclosure Policy

<https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/408/disclosurepolicy.pdf>

Diversity and Inclusion Policy

<https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/407/diversityandinclusionpolicy.pdf>

Dividend Policy

<https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/406/dividendpolicy2021.pdf>

Donation and Grants

<https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/405/donationandgrantspolicy2021.pdf>

Energy Management Policy

<https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/2677/energymanagementpolicy.pdf>

Environmental Policy

<https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/1248/environmentalpolicy.pdf>

Health and Safety Policy

<https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/403/healthsafetypolicy.pdf>

Human Resources Policy

<https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/402/humanresourcespolicy.pdf>

Human Rights Policy

<https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/401/humanrightspolicy.pdf>

Information Security Management Approach

<https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/400/informationsecuritymanagementapproach.pdf>

Quality Policy

<https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/2720/qualitypolicy.pdf>

Remuneration Policy

<https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/399/remunerationpolicy.pdf>

Third-Party Relations Policy

<https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/2446/thirdpartyrelationspolicy.pdf>

Water Policy

<https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/397/waterpolicy.pdf>

Zero Tolerance Policy Towards Violence

<https://www.enerjisainvestorrelations.com/medium/ReportAndPresentation/File/396/zerotolerancepolicytowardsviolence.pdf>



RISK MANAGEMENT

Enerjisa Risk Management Approach

Enerjisa Enerji aims to ensure sustainable and predictable profitability by effectively managing risks in the energy markets and protecting the value created as a result of sales and distribution activities with its risk management policies.

Setting risk management as an integral part of sound management, Enerjisa Enerji's Risk Management Framework aims to identify risks and opportunities that may impact the Company's financial, operational and strategic plans. The framework enables the assessment, classification and mitigation of these risks through various methodologies. The ultimate aim of this framework is to provide transparency to management functions and to support decision-making processes through regular reporting.

Enerjisa Enerji acts by the principle of assigning responsibility to the business units in risk identification and risk management as recommended by quality standards in this field such as the Committee of Sponsoring Organisations of the Treadway Commission (COSO) and ISO 31000. In this context, risk coordinators were appointed in the business units to act as a bridge between the departments and the central risk management function.

Risk management workshops are held annually with the risk coordinators and business unit process owners to raise risk management awareness. In these workshops, the important topics of the previous year, the annual risk management calendar and risk analysis, consolidation and reporting methodology are discussed.

Risk Governance Structure

Enerjisa Enerji utilises both mandatory committees in accordance with legislation and non-mandatory committees to ensure effective and

functional risk management. Established under the CFO organisation, the Central Group Risk Management function is responsible for scoring risks, monitoring and improving risk management processes and periodically reporting risks along with their impacts and improvement actions. The findings and risk management objectives, compiled by the central risk management function, are first presented to the Risk Management Committee, formed of senior executives from all business units and chaired by the CFO.

In the next stage, these findings are presented to the Early Detection of Risk Committee, which is formed of the members of the Board of Directors. The Early Detection of Risk Committee is responsible for advising the Board of Directors of risks and opportunities that may affect the existence and strategies of the Company, related mitigation actions, early detection processes and measures, as well as monitoring the effectiveness of the risk management processes. The Early Detection of Risk Committee is chaired by an independent board member. Following the board review, agreed actions are monitored by the CFO and the Early Detection of Risk Committee.

Risk Management Procedure

The risks and opportunities to which Enerjisa Enerji is exposed are identified with a detailed assessment study. This study is elaborated with two approaches: qualitative and quantitative risk reporting methodology.

1. Qualitative Risk Reporting

Methodology: Risks whose direct financial impacts cannot be quantified but which have the potential to have a negative impact on the Company's strategic and operational activities are prioritised through the scales, which are defined according to their impact levels and probabilities, and reported with risk heat-maps. These studies form the basis

of the Risks and Opportunities Report submitted to the senior management and the Early Detection of Risk Committee.

2. Quantitative Risk And Opportunity

Methodology: For each risk and opportunity, the best-case, base-case and worst-case scenarios are collected from the business units. The probabilities of realisation of these risks and opportunities are determined, simulated using numerical analysis methodologies and grouped according to their expected values. During the consolidation of the impacts of risks and opportunities, correlations are taken into account and any fluctuations that may affect the Company's net profit are reported.

Basic Categories of Risk and Opportunities

Enerjisa Enerji establishes risk management systems and prepares action plans to minimise the occurrence of financial and non-financial risks and their effects to maximise the value it creates for its stakeholders.

Financial and non-financial risks are mapped by identifying their effects on the sector and operations. The risk mapping process consists of three stages: identification, assessment and classification. These cover the regular reporting and decision-making processes, while also facilitating transparency.

Financial Risks and Opportunities

The nature of electricity distribution and retail sales activities exposes the sector players to various risks and opportunities in the value chain. At Enerjisa Enerji, risks and opportunities are categorised and monitored according to their sources. These risks are followed up and prioritised depending on their possible impact levels and recorded with risk-mitigating practices. Following the sensitivity analysis, quantifiable risks and their financial implications are reported.

MAIN RISKS AND OPPORTUNITY AREAS	HOW THEY ARE MANAGED
Regulation Risks and Opportunities	<p>Electricity distribution and retail sales activities are regulated businesses that are carried out under the supervision of the EMRA and are governed according to the principles determined by the Electricity Market Law and secondary legislation. Enerjisa Enerji applies the National Tariff determined by the EMRA to its regulated customers. The National Tariff consists of the tariffs applied to the users of the transmission and distribution system. The EMRA determines the items of the National Tariff for each tariff period.</p> <p>Revenue requirement and/or price ceilings for regulated activities is determined by the EMRA and reflected to the end consumer through the National Tariff mechanism by taking into account all the costs and services for the execution of the relevant activity in the fourth regulatory period, which will apply between January 1, 2021–December 31, 2025, as in the previous regulatory periods.</p> <p>Since the majority of the Company's revenues are derived from electricity distribution activities and retail sales to regulated customers at a tariff set by the EMRA, changes in any component of this tariff may lead to a significant deviation in Enerjisa Enerji's plans.</p> <p>In addition, regulations issued by the EMRA include organisational and operational requirements and limitations regarding retail sales and distribution activities. These requirements and limitations are audited by regulatory authorities (primarily the EMRA), and any findings of non-compliance may adversely affect Enerjisa Enerji's financial and operational plans.</p> <p>Enerjisa Enerji conducts regular and constructive reviews with industry participants and regulatory bodies in order to manage regulatory risks and opportunities. The Company also engages in rational and fact-based negotiations with other market participants and regulatory bodies as the market leader through systematic projects and transparent reporting. As a result of the meetings conducted and in-house activities, work and initiatives are carried out that will positively contribute to all sector stakeholders, including consumers, and legislative measures to support the sustainability of the sector.</p>
Market Risks and Opportunities	<p>Enerjisa Enerji is exposed to interest rate fluctuations in financial markets as a result of its financial debt, and to exchange rate fluctuations due to the Renewable Energy Resources Support Mechanism (FIT).</p> <p>Enerjisa Enerji is also affected by volatility in over-the-counter market pricing and trading volumes in the commodity markets due to retail sales activities, as well as volatility in prices of other products due to material procurement in distribution activities (procurement is conducted in TL terms, but prices are correlated with prices in the commodity markets).</p> <p>Enerjisa Enerji uses systematic approaches in order to estimate market parameters such as price, inflation, interest rates, exchange rates and demand in the most realistic way. Existing and expected exposure is checked on a regular basis and maintained at an optimum level with hedging transactions. Derivative transactions and the effectiveness of these transactions are periodically discussed within the Finance Committee and the Commodity Risk Committee.</p>
Credit Risks and Opportunities	<p>Enerjisa retail companies are exposed to credit risks due to sales in the regulated and liberalized markets.</p> <p>Enerjisa Distribution Companies, on the other hand, are exposed to credit risks due to the system usage receivables to be collected from retail companies that provide retail sales services using the distribution network. In addition, invoicing for theft/illegal electricity use also poses a credit risk in collection processes.</p> <p>Enerjisa Enerji manages its credit risk by obtaining security deposits from regulated customers, letters of guarantee or other types of guarantees from liberalized customers. Timely invoicing, efficient receivables management and monitoring the credit ratings of large customers enables Enerjisa Enerji minimise its credit risk.</p> <p>In addition to carrying out reporting and follow-up activities aimed at reducing the credit risk arising from financial transactions, the Company works only with the counterparties that have a credit rating of no more than two notches below the sovereign rating. In addition, steps are taken to ensure the diversification of banks in the portfolio of financial derivative instruments and deposits.</p>
Liquidity Risk	<p>Enerjisa Enerji is exposed to liquidity risk due to network investments in the distribution business or temporary funding needs driven by collection performance in the retail business. Although the Company believes this funding need can be covered by external debt capital providers, there is a risk that market conditions could limit conventional liquidity sources.</p> <p>Enerjisa Enerji manages liquidity risk by extending the average tenor of its debt portfolio and developing alternative debt capital sources such as corporate bonds. In addition, the Company regularly forecasts its short- and medium-term cash needs in order to anticipate the liquidity need in a timely manner and to take appropriate action.</p>
Operational Risks	<p>All processes in Enerjisa Enerji's value chain are exposed to operational risks arising from internal and external factors. The areas affected by these risks are grouped under the categories of Information Technologies and Occupational Health and Safety (which mostly pertains to the distribution business), Environment, Human Resources and Reputation and are examined in detail with mitigation plans.</p> <p>Relevant procedures and policies are established for all operational risks and published in Enerjisa Enerji's quality management systems. Committees are appointed to review realisations and manage risk mitigation activities.</p>

RISK MANAGEMENT

Non-Financial Risks and Opportunities

MAIN RISK AND OPPORTUNITY AREAS	DEFINITION OF RISK	HOW THEY ARE MANAGED
Occupational Health and Safety (OHS) Risks and Opportunities	Electricity distribution involves a high level of OHS risks. Accidents, which may occur during the construction, maintenance and repair of power lines, pose significant risks to the safety of employees and subcontractors as well as the reputation of the Company.	Enerjisa Enerji works to the goal of zero critical injuries and accidents. Related risks are managed within the scope of the ISO 45001:2018 standard. The OHS issue is under the oversight of senior management. Risks faced by the Company and contractors are proactively managed. Within the framework of the Safety Improvement Plan, targets are defined, risks are managed and preventive measures are planned. The Fine-Kinney method is used to classify risks. Enerjisa Enerji organises training programs in order to reduce its risks and provide a healthy workplace for its employees and contractors.
	Severe weather conditions, floods and fire resulting from climate change may disrupt customer services and the electricity distribution infrastructure. As a result of this situation, Enerjisa Enerji might be subject to fines, depending on the number of customers without energy and for how long the energy flow is interrupted.	Enerjisa Enerji prepared its Biodiversity Conservation Action Plan in 2020. Within the scope of the CDP Climate Change, the issue of climate change is evaluated from the perspective of risks and opportunities. In the CDP-related study carried out in 2021, a report was prepared under the heading of carbon emissions and climate change, which includes the definitions of risks and opportunities, the financial effects of risks and opportunities, methods of combating risk and the costs of these methods.
Risks and Opportunities Related to Climate Crisis and the Environment	Global warming may lead to droughts, which may also affect energy prices. In addition, developments such as the global and regional regulatory environment and Türkiye's ratification of the Paris Agreement are important for the Company to take the necessary measures to combat climate change.	The spilling of transformer oil during the operation, maintenance or storage, and causing water and soil pollution poses a risk.
	Because of operating in a highly regulated market of Enerjisa Enerji, there is a risk of facing fines or sanctions if it does not meet relevant regulatory requirements.	In addition, the study to quantify climate change risks was completed. The study uses climate change-related acute inventory losses and damages, disruptions to service and penalties for quality standard violations stipulated by the legislation as inputs. The Company regularly monitors and reports its environmental performance and carbon emissions. The Company takes part in various initiatives on climate change and energy efficiency, meets with the NGOs and regulatory authorities and develops R&D projects. Enerjisa Enerji offers solutions to customers to help them reduce their carbon emissions.
	In line with the Paris Climate Agreement and Türkiye's net zero emission targets, Enerjisa Enerji may be subject to carbon tax.	
	As a result of risks related to climate change, such as drought, Enerjisa Enerji customers' activities may be affected negatively. They may have difficulty paying their electricity bills, and this may result in a decrease in Enerjisa Enerji's earnings.	
	An increasing population, urbanisation and rising mean temperatures increase the demand for electricity in Türkiye. Increasing demand for products and services results in increasing revenues and more low carbon products and services are developed.	
	As a result of connecting renewable energy systems and charging stations to the grid, grid development investments are increasing.	
Risks and Opportunities Related to Digitalisation and Customer Privacy	In line with green financing mechanisms, diversification of funding resources is increasing.	Insurance is taken out for damage due to severe weather conditions caused by climate change and lack of payment of bills.
	Increasing complexity in protecting customer data and IT systems poses risks, especially for those companies with databases holding the data of millions of customers. Additionally, data security breaches may occur due to cyber-attacks with increased digitalisation of grids and processes.	Enerjisa Enerji takes all necessary precautions to ensure confidentiality and security of customer information and personal data at the highest level within the framework of the legislation in force. Within that scope, the measures and actions determined in accordance with corporate policies are implemented within the Company. A holder of the ISO 27001 Information Security Management System certificate, Enerjisa Enerji fully complies with the Personal Data Protection Law (PDPL) and provides training to its employees on PDPL and information security, under the supervision of the Personal Data Protection Committee. There is a Cyber Incident Response Team under the Cyber Security Group Management to manage cyber-attack risks and the Company has insurance against cyber-attacks.

Developments in 2024

Risk management departments should keep track of realized/unrealized risks and analyse them effectively and efficiently. As a result of this analysis, changes in the mitigating actions that need to be taken or the methodologies that need to be updated are identified and an improvement in the detection of risks is achieved. In parallel with this, Group Risk Management takes the Risk Reporting Performance Measurement (Backtesting) studies one step further with digitization projects. Improvements have been made to the input and reporting screens in the qualitative backtesting module within Periscope. These enhancements have been designed to enable users to enter data into the system more easily and accurately, aiming to prevent incorrect or incomplete data entries. Additionally, the adjustments made to the reporting screen have made the tracking and analysis of data entries more efficient

In 2024, as part of the work carried out with the Sustainability team, Environmental, Social, and Governance (ESG) risks for the entire company were thoroughly assessed and marked in the Periscope system to facilitate easy reporting. Similarly, in collaboration with the Distribution and Retail Compliance teams, the company's compliance risks were identified and marked in the system to integrate them into management processes. Through comprehensive work carried out with the Internal Control Team, processes for EMÇ and Eşarj companies were established within the year 2024, and risks related to these processes were identified in detail. Appropriate action plans have been defined to prevent or mitigate the identified risks.

CODE OF BUSINESS ETHICS AND COMPLIANCE MANAGEMENT

In 2020, the Enerjisa Enerji Compliance Management Unit was structured to define and prevent compliance risks, carry out the necessary awareness-raising and training activities, monitor violations, execute an effective compliance management system and report compliance management performance regularly. Accordingly, mandatory online Compliance trainings have been designed to expand and sustain the compliance culture. In 2024, customized trainings have also been planned and organized taking into account the needs of the relevant business units. Special awareness raising activities were carried out for business units deemed important for the dissemination and development of a culture of compliance. Within the scope of these activities, case studies designed based on ethical dilemmas that the relevant business units may face in real life in accordance with their roles and responsibilities were conducted.

Regular communication activities were conducted in 2024 to increase compliance awareness, and compliance messages were shared with all employees within the Company on special days and weeks. On December 9, World Anti-Corruption Day, Enerjisa Enerji drew attention to the importance we attach to a culture of integrity, accountability and compliance in our business processes; during the International Fraud Awareness Week, which is celebrated every November, we reminded that it is the duty of all Enerjisa Enerji employees to fight against fraud by giving examples of the most common cases of fraud; and on October 16, World Ethics Day, a special communication work was carried out to remind our managers of their special roles and responsibilities in compliance issues. On June 12, World Day for the Elimination of Child Labor, Enerjisa Enerji once again emphasized its zero-tolerance approach to all forms of child labor in its own operations and those of its stakeholders and suppliers. On December 10, Human Rights Day, we once again emphasized our commitment to human rights as equal, universal and inviolable for all, and shared with all our employees the work we have done as part of the 16-day activism campaign to combat violence against women.

Enerjisa Enerji initiated the process for ISO 37301:2021 Compliance Management System Certification for effective compliance management. As part of the process, the Enerjisa Compliance Policy was prepared and approved by the Board of Directors. ISO Internal audits of the related departments as per requirements of the standard were completed within Distribution, Retail Sales and Group companies by the Compliance Function. As of March 10, 2023, the Compliance Management System Certificate process has been completed. In 2024, the follow-up audit conducted by KPMG Germany was successfully completed and the ISO 37301:2021 Compliance Management System certificate was renewed.

The Compliance Policy can be accessed on the Investor Relations website.

Business Ethics

The Enerjisa Code of Conduct (Enetik 2.0) provides that the Company's activities are carried out in an honest, transparent, fair and reliable framework. Enetik 2.0 is developed by the Compliance Management Unit in consultation with the relevant teams and within the scope of continuous improvement in line with changing needs and emerging new compliance risks reviewed once a year and updated if required.

Every Enerjisa Enerji employee is committed to the framework that defines the fundamentals of the Company's way of doing business. The Enerjisa Code of Conduct addresses various issues such as human rights, protecting the environment, anti-bribery and anti-corruption, compliance with sector-related and general legal regulations, establishing sustainable relations pursuant to the rules of competition, protection of personal data and confidentiality, protection of corporate data and assets, principles related to the use of printed and mass media as well as social media, relations with public institutions and political organizations, conflicts of interest, accepting and giving gifts and donations, working outside of the Company, and Health and Safety.

All employees are responsible for acting in compliance with the Code of Conduct, while the Compliance Management Department is responsible for the awareness and guidance activities. All Compliance Management Department employees completed the Corporate Ethics and Compliance Management training provided by the Ethics and Reputation Society and obtained the Ethics and Compliance Managers Certificate.

Compliance Management Unit provide compliance consultancy to Company employees with a proactive approach. The Compliance Management Unit replies to guidance and opinion requests from employees regarding actions and processes that may violate the Code of Conduct, carries out activities to raise awareness of related issues and conducts training for the Company at the executive level. The Compliance Management Unit also monitors compliance rules and possible compliance risks through the risk matrix prepared in accordance with the scope of the Compliance Management system's risks.

The follow-up and investigation of violations of the Code of Conduct are monitored by the Internal Audit Department, and the Compliance Function supports the reviews and investigations of the Internal Audit Department regarding any violations of business ethics. The Corporate Compliance Officer takes charge as a member of the Ethics Committee within this process.

Informing and Training Employees

The Enerjisa Code of Conduct and compliance policies are disclosed to all employees via email. The Code of Conduct is constantly and easily accessible on the Company website in the Document Management System, which is available to all employees, and under the İKON application, the mobile application for employees.

Enerjisa Enerji provides training for employees to understand and adopt the Code of Conduct. Mandatory compliance trainings include Human Rights Training, Third Party Relations Training, Competition Compliance Training, Anti-Bribery and Anti-Corruption Training, Personal Data Protection Law Training, Speak Up Culture Training and Conflict of Interest Training. In 2024, mandatory compliance trainings continued to be provided online according to the needs of business units and employees. Culture of Speaking Up and Prevention of Retaliation Training was prepared with artificial intelligence support in 2024 and shared with our employees.

On the other hand, in order to increase the quality of our compliance trainings, we design and offer face-to-face trainings to both our employees at Headquarters and our employees in the field on a risk-based and business unit basis, in addition to our mandatory online trainings. At our Headquarters in Istanbul and Ankara, we provided face-to-face trainings on third party compliance risks for procurement teams. Similarly, we provided face-to-face awareness trainings specifically for Enerjisa employees working at Customer Service Centres in Ankara, Karadeniz Ereğlisi and Zonguldak. In our distribution regions, we organized training activities in Osmaniye, Hatay and Adana in accordance with the needs and operational requirements of business units.

Business Ethics Violation Notifications

All Enerjisa Enerji employees and stakeholders can anonymously report any non-compliance or violations of the Code of Conduct by calling the Enerjisa Enetik Hot-Line at 0 (216) 579 09 14, by sending an e-mail to enetik@enerjisa.com or a letter to Enerjisa Enerji Internal Audit Presidency, Nidakule Batı 1/1 Ataşehir 34746, İstanbul. An additional reporting channel has also been created for employees to easily submit ethical violation notifications via the in-house application İKON, which they

can also use on their mobile devices. In addition to these reporting channels, all stakeholders have the opportunity to direct their notifications to the Sabancı Holding ethics line.

The internal Audit Department reviews these reported notifications and investigates them if required. On the other hand, as a requirement and as a result of the importance Enerjisa Enerji attaches to the culture of speaking up, it is possible to report ethical violations anonymously, and reports made anonymously are examined with the same sensitivity and confidentiality and investigated when necessary. Moreover, the Internal Audit Department is also in charge of maintaining confidentiality and anonymity of all reporting channels. The notices are scrutinised and reported to senior management and, if required, to the Disciplinary Board. The Audit Committee is informed about the notices reported to the Disciplinary Board.

Employees who honestly and in good faith report a violation and/or suspected violation and/or request information shall not be subject to any retaliation (including but not limited to discrimination, suspension, loss of rights, demotion, blocked promotions, threats or harassment) as per the Company's Anti-Retaliation Policy.

In 2024, the Company received 115 notifications via different channels, such as the ethics line, shareholder requests, business units and human and culture departments, and resolved all of them.

Information on risks related to the violation of the Code of Conduct, including anti-bribery and anti-corruption, are collected from the related units during the qualitative risk assessment activities carried out twice a year and are reported to the Early Risk Detection Committee or Enerjisa Risk Management Committee. At the beginning

of each year, risk realisations due to the violations are evaluated, and the reported expectations, probability and impacts of risk realisations are reviewed in the back-testing, during which the performance of the risk reports of the previous year is measured.

Anti-Bribery and Anti-Corruption

The prevention of bribery and corruption is governed by the Enerjisa Code of Conduct and Anti-Bribery and Anti-Corruption Policy, in particular, which are binding for all employees and stakeholders. The Company is against all forms of bribery and corruption. It is unacceptable to receive or offer bribes, regardless of their purpose. All practices and sanctions related to the violations of the Code of Conduct also apply to bribery and corruption.

The Board of Directors is responsible for the implementation and revision of the Anti-Bribery and Anti-Corruption Policy. The Policy covers all Company employees, including the Board of Directors of the Company, companies contracted for goods and services and their employees, all persons and organizations that are assigned to serve on behalf of the Company (business partners), including suppliers, consultants, advocates, external auditors, et cetera.

The Policy is uploaded to the Document Management System and is accessible by all Enerjisa Enerji employees. Furthermore, business partners are also requested to sign the Enerjisa Third-Party Business Ethics Rules and Compliance Declaration, which includes Enerjisa Enerji's commitment to comply with the Anti-Bribery and Anti-Corruption Policy.

CODE OF BUSINESS ETHICS AND COMPLIANCE MANAGEMENT

The Compliance Management Unit is in charge of developing the Enerjisa Code of Conduct and the Anti-Bribery and Anti-Corruption Policy, providing training to employees and responding to requests for an opinion. The Ethics and Investigation Department works in coordination with Compliance Management to raise awareness about compliance with business ethics in general, as well as all internal procedures and policies, including the Company's Anti-Bribery and Anti-Corruption Policy. The Ethics and Investigation Department regularly informs the Board of Directors, Audit Committee and Head of Compliance and Corporate Legal Department regarding the nature and intensity distribution of violations of ethical rules and shares its opinions and suggestions about the actions taken or to be taken.

Informing and Training Employees

The Anti-Bribery and Anti-Corruption Policy has been disclosed to Company employees. The up-to-date policy, which is continuously and easily accessible in the Document Management System available to all employees, is also available on the Company's website.

Notifying Other Stakeholders

Enerjisa Enerji uses the best anti-bribery and corruption practices in the selection of its suppliers and business partners. The company is in constant communication with its suppliers and business partners to prevent possible future violations regarding corruption. If a possible violation is identified, the required sanctions are imposed immediately in accordance with the signed contracts.

Anti-Bribery and Anti-Corruption Notifications

In the notifications reported in 2023, bribery and corruption cases were detected and investigated; necessary process improvements, legal actions, and disciplinary measures regarding these notifications have been implemented.

There are no lawsuits, administrative or judicial investigations or any judicial or administrative sanctions against the Company related to bribery and corruption.

Enerjisa Enerji places utmost significance on stakeholder dialogue and collaboration with NGOs regarding anti-bribery and anti-corruption. Since 2020, the Company has been a corporate member of the Turkish Ethics and Reputation Society. In 2021, Enerjisa Enerji committed to complying with the principles of Transparency International to underscore its determination to satisfy higher ethical standards.

Donations and Grants

As per The Enerjisa Donations and Grants Policy no donation shall be made to any political parties, political candidates, managers of political offices or representatives of public administration for political purposes. In line with the related policy, it was stipulated that donations and grants shall be made to public institutions and organizations, nongovernmental organizations and other private natural persons and legal entities only for social, cultural, educational, environmental protection and similar purposes related to sustainability. Enerjisa compliance teams were added to the Donation and Grant approval processes in 2023, and donations and grants are also examined from a compliance perspective.

Third-Party Relations

Enerjisa Enerji has the goal to establish sustainable relations with all third parties with which the Company has business relations as part of its activities in accordance with the fundamental principles outlined in the Enerjisa Code of Conduct. Thus, the Enerjisa Third-Party Relations Policy was developed in 2021 and approved by the Board of Directors of Enerjisa Enerji.

The purpose of this policy is to define the fundamental principles regarding the conditions that govern Enerjisa Enerji's

work with third parties and the parties to be worked with as part of all business processes of Enerjisa Enerji A.Ş. and its subsidiaries. As part of the policy, 'Third-Party' refers to the persons, organisations and communities with which the Company establishes any kind of business relations, such as suppliers, dealers, authorized dealers, service providers and consultants.

Some amendments were made to the said policy in 2022; a wide definitions section was added to the Policy, the countries/regions that are subject to sanctions were determined and a risk-based preliminary assessment stage for third parties was defined.

Sales and/or other business activities from countries, regions and companies (particularly regarding solar panels and products containing critical metals and minerals) that appear risky in terms of compliance have been added as criteria that require third-party control.

Enerjisa Müşteri Çözümleri A.Ş., a subsidiary of Enerjisa Enerji, has developed a supply chain management system for solar panel suppliers that meet the criteria in light of the OECD, ILO and UN Guiding Principles on Labor and Human Rights, taking into account environmental, social and governance (ESG) principles.

The system includes risk mapping, preventive measures, complaint and notification mechanism, auditing and reporting, and corrective actions.

Thanks to this system, working conditions that comply with human rights and business ethics are encouraged while minimizing the environmental impact of our suppliers. Enerjisa Müşteri Çözümleri A.Ş.'s collaborative approach aims to ensure that suppliers comply with our sustainability goals and become partners in development processes.

In addition to this, commitments have been added that the criteria of the United Nations and other international organisations will be considered and followed, especially in the prevention of child labour and forced labour on Human Rights.

The Compliance Unit prepared an interactive video training on the Company's Third-Party Relations Policy in 2023 and assigned it to employees across the Company.

The updated Third-Party Relations Policy can be accessed on the Investor Relations website.

Another policy that reveals Enerjisa's approach to Third Party Relations is the Human Rights Policy. The Human Rights Policy covers all Enerjisa employees, management team, business partners in our sphere of influence and other parties in our supply chain. Enerjisa Enerji is a member of the UN Global Compact as of 07.10.2019 and supports its ten principles in the areas of human rights, labor standards, environment and anti-corruption and demonstrates this support through its Human Rights Policy. We expect our business partners to adhere to business principles consistent with ours.

In 2024, Enerjisa's Human Rights Policy was extensively revised. Accordingly; our expectation from our suppliers to share the policy with their suppliers and to implement the standards herein has been clearly expressed, arrangements have been made in accordance with International documents against issues such as child labor, forced labor, human trafficking, debt bondage, gender discrimination, child abuse, discrimination and harassment, The provisions on minimum working age and young workers are in line with the International Labor Organization (ILO) Convention No. 138, and the provisions on working hours are in line with the Working Hours (Industry) Convention 1919 (No. 1).

Related Party Transactions

Every year, the Board of Directors resolves to specify the principles related to the transactions to be carried out by Enerjisa Enerji with related parties pursuant to the Capital Markets Legislation.

Accordingly, it is decided in the assessment regarding all assets, services and liability transfer transactions, including common and recurring transactions between the Company and the related parties, including in the financial plans (budget) approved by the Board of Directors that;

- Transaction conditions should be determined in line with previous years, as well as market conditions;
- Transactions should be carried out in line with the financial planning of the Company unless there is a significant change in the conditions of the transactions during the year, and
- Approval of the Board of Directors should be requested in the event of a change in the conditions of the transactions or the related parties and before the transaction is held with the new conditions (significant price or quantity deviations, significant change in the nature of the purchased service or product).

Furthermore, an annual assessment is made whether the ratio of common and recurring related party purchase (sales) transactions to the amount of cost of sales (revenue) according to the past year's financial statements exceeds 10% as per the Corporate Governance Communiqué (II-17.1). If the ratio exceeds 10%, a report is prepared by the Board of Directors regarding the terms of the transactions and their comparison with the market conditions, and the entire report or the outcome is disclosed on the Public Disclosure Platform. Enerjisa Enerji did not make any PDP announcement on the subject since the transactions made in 2023 did not exceed the said threshold.

Mitigation of Conflict of Interest Situations

Enerjisa Code of Conduct sets a compliance framework for all employees to avoid conflicts of interest while making business decisions. Enerjisa sets out principles and rules to prevent employees and managers of all subsidiaries and all stakeholders of Enerjisa from putting their personal or corporate interests ahead of the interests of Enerjisa in their business decisions. Enerjisa Conflict of Interest Policy was adopted by the Board of Directors and put into effect on 12.02.2024 and disclosed to the public via Enerjisa website and investor relations website. This Policy covers all employees of Enerjisa, including the Company's Board of Directors, all subsidiaries of Enerjisa and all business partners, including suppliers, dealers, authorized dealers, service providers, consultants and external auditors, as well as individuals, institutions and communities with whom any kind of business relationship is established.

Cases in which the personal interests of one or more employees and/or their family members and the interests of the Company have positive or adverse impacts on each other are identified as a conflict of interest.

The opinion of the Compliance Manager shall be considered in actions taken on such cases. To prevent such events, relationships and situations involving potential or real conflicts of interest shall be avoided. In supplier selection processes, any actions that may benefit the Company employees, their relatives and/or third parties shall be avoided.

INTERNAL AUDIT

The Enerjisa Enerji Internal Audit Department reports directly to the Audit Committee, composed of Board members as per the principle of independence. Internal Audit activities have the purpose of expressing opinions to the Board of Directors on the activities of the Company and its affiliates in line with the laws and other related legislation, as well as internal strategies, policies and procedures and on the effectiveness and adequacy of internal audits, besides risk management systems and compliance management. The goal of these activities and structuring is to improve work processes and create added value for the organization through the presented opinions and suggestions related to taking preventive measures, protecting company assets and increasing operational efficiency. In line with this goal, internal audit activities are carried out in compliance with the approved Audit Committee charter and the Internal Audit charter.

The annual risk-based internal audit plan, which is prepared by taking into account the Company's risk assessment results that are updated every year and the opinions of the relevant executives,

is submitted for the approval of the Audit Committee and the Board of Directors. Every year, the audit activities are carried out in accordance with the international audit standards and the requirements of COSO as part of the approved audit plan. Full compliance to the International Audit Standards was certified again in 2023, with the independent quality assurance audit conducted by KPMG.

Internal Audit also covers the assessment and analysis of the ethics notifications received regarding employees and other stakeholders (shareholders, customers, suppliers and public institutions). Besides the audit activities, consultancy services are also provided in line with the vision and mission of the Company as part of the demands of senior management and pursuant to the "reliable business partner" principle.

In 2023, Continuous Audit and Continuous Monitoring activities were implemented effectively; hence, all units were supported to develop effective control practices. Furthermore, findings and improvement suggestions based on data analytics methods that were not included in the audit plan were shared with the business units.

The primary goal of the Internal Control System, which is one of the key components of effective and sustainable governance, is to ensure the continuous effectiveness and efficiency of the control environment, applied controls, and information and communication channels, thereby supporting senior management in fulfilling their oversight responsibilities.

To achieve this goal, Process Management, Risk Management, Control Activities, and Business Continuity structures at Enerjisa Enerji have been end-to-end modelled in the Periscope software to be managed effectively and efficiently. Within the scope of this work, transparent, reliable, and up-to-date information flow regarding business processes, their interdependencies, ownership, risks, and controls has been established. Process, risk, and control management are conducted in a digital environment, allowing the central monitoring of the effectiveness and efficiency of controls related to risks. In this context, over 1,000 workflows, nearly 800 operational risks, and more than 1,100 control activities, 13% of which are automated, have been defined.

Online training courses prepared to ensure the understanding and adoption of the Periscope system by employees have been assigned to all white-collar employees through the EnAkademi platform.

INTERNAL CONTROL

In 2023, efforts were undertaken by top management to evaluate the effectiveness and efficiency of preventive, detective, and corrective controls in place to control the risks of the Company and its subsidiaries through three main processes, which were approved. Areas for improvement and identified action plans were reported within the scope of this work.

Additionally, in 2023, a project was carried out within Enerjisa Enerji to extract the end-to-end process universe, identify risks and controls, and define them in the Periscope system for Enerjisa Customer Solutions and Eşarj subsidiaries. The work related to Eşarj is expected to be completed in the first quarter of 2024.

To standardize critical approval mechanisms in company processes and reduce potential risks, the "Authorization Delegation Matrix Project" has been initiated, aiming to ensure compliance with the Human and Culture system infrastructure and signature circulars. The project involves the central management of the Company's approval processes from a single system, increasing and standardizing automation levels. The system integration of the project is planned to be completed in 2024.

Internal Control closely follows the latest technological developments and strives to implement them. In this context, the Company conducted two pilot projects with two different suppliers to integrate Process Mining solutions into company governance competencies, aiming to model, analyse, and optimize business processes. The results of the project were evaluated, and this technological solution, which allows rapid end-to-end process analyses by processing process data, enables companies to create action plans to increase process automations. Process Mining competencies are planned to be integrated into the Company in 2024 based on top management decisions.

Continuous improvements are made to the Periscope System to manage Process Management, Risk Management, Internal Control, and Business Continuity activities in line with current requirements. In this context, in 2023, an opportunity module was added to the Periscope system, providing systematic tracking capability for opportunities related to processes.

In rapidly changing and complex environments, the Internal Control team needs to have regularly updated knowledge and skills to effectively carry out internal control processes. In this regard, the Internal Control team successfully completed the COSO Internal Control Certificate program offered by the Turkish Institute of Internal Auditors to enhance their competencies.

BUSINESS CONTINUITY MANAGEMENT PRACTICES

Enerjisa Enerji carries out electricity distribution, retail sales and customer solutions activities in 26 provinces and at 44 sites. Business continuity has critical importance in providing uninterrupted and sustainable energy services with this wide operation network. In this context, Business Continuity Management System (BCMS) practices have been implemented since 2015 to create an organization that is resilient to possible interruptions and crises within Enerjisa Enerji A.Ş. and its subsidiaries.

The Group Risk Department, which is part of the CFO organization, monitors the global BCMS, prepares all documents and implements the standards with this approach.

The Group Risk Department is also responsible for monitoring the crisis management processes and guiding the Crisis Management Team in the event of a crisis, comprehensive interruption and/or disaster, which may affect Enerjisa Enerji in general.

The Enerjisa Enerji BCMS documentation has been prepared in accordance with the ISO 22301:2019 BCMS standards and updated every year with the contributions of all relevant stakeholders in the process. The ISO 22301 BCMS certificates of Enerjisa retail sales companies were renewed in 2024 following the successful completion of the annual monitoring audits conducted at the head office and with the participation of the business continuity departments in Ankara, İstanbul and Adana. Although the certification was obtained solely for retail sales companies, the BCMS infrastructure and documentation quality is maintained at the same level in all Enerjisa business units, including distribution companies and Enerjisa Enerji A.Ş.

Critical Processes and Departments

Critical Departments are the units with at least one process that must be activated within the month following a crisis to ensure business continuity. The relevant processes of these critical departments are considered “critical processes,” and the owners of these processes comprise the members of the Business Rescue Teams. Business Rescue Teams are responsible for putting the process back on track after any interruption.

Coordination

To raise awareness about business continuity, update documents, and enhance collaboration with units responsible for emergency/ crisis situations, Business Continuity Information workshops continued with the participation of relevant units. Separate meetings were organized to increase coordination with units involved in business continuity processes.

Drills and Exercises

Two methods are followed to evaluate the extent to which the scenarios and forecasts prepared within the scope of the BCMS will succeed in real-life scenarios.

Scenario-Based Desktop Exercise: As addressed in the ISO 22301:2019 certification audit held every year; a desktop exercise is conducted about the scenario and a final report of this exercise is submitted to the auditors and is shared with process stakeholders.

Disaster Recovery Test: Every year, disaster recovery tests are carried out by the decision of the IT Senior Management and under the leadership of the IT Business Continuity team. Unlike previous years, tests were conducted over a more extended period rather than within 24 hours, based on feedback from business units and IT teams. The Group Risk Management is responsible for participating in the test activity as an observer and for archiving the final test reports. During the course of the ISO 22301:2019 certification audit, these final reports are shared with the audit company.

Critical IT applications with criticality level 1 and 2 used at Enerjisa Enerji are recovered and raised in an isolated environment in the Disaster Recovery Centre, together with all business owners, without affecting the production environments during the exercise. The Recovery Time Objective, Recovery Point Objective and Maximum Tolerable Period of Disruption are measured as defined in the Business Continuity Management standards. The data obtained in the exercise are synchronized with the data in the IT and Group Risk Management documents.

Developments in 2024

In 2024, efforts to increase the awareness of the Enerjisa Business Continuity Management structure within the organization and to enhance collaboration with relevant units continued. Benchmarking studies were conducted with some companies of similar size and structure to improve Business Continuity practices.

A tabletop simulation exercise was conducted for the Crisis Management Team, focusing on a potential social reaction scenario. Additionally, a call test was performed for the satellite phones held by the Crisis Management Team and some relevant managers.

The Periscope application, which is used for risk and internal control processes, is also used for the Business Continuity Management process. Business impact analysis details regarding critical processes are monitored via Periscope and updates are made on this application. In 2024, the training content related to business continuity practices in the Periscope application was updated.

Necessary updates were made to the business continuity plan documents for Enerjisa Distribution and Enerjisa Retail, and these documents were published in QDMS in the first quarter of 2024. The updated business impact analysis was used in these revision efforts, and input from relevant managers was also gathered. Additionally, a study was conducted to define business continuity scenarios and critical processes for Enerjisa Customer Solutions and Eşarj.

As part of IT business continuity efforts, the EE-P-773 System and Service Life Cycle document has been published. Annual Disaster Recovery Tests have been completed. Follow-ups were carried out for backup procedures of applications and restoration tests from backups. Additionally, work and improvements have been made to review the service catalog within IT and the service life cycle framework.

CORPORATE GOVERNANCE RATING

Enerjisa Enerji has demonstrated the transparency, accountability and sustainability of its management with its corporate governance rating. SAHA Kurumsal Yönetim ve Kredi Derecelendirme Hizmetleri A.Ş. (SAHA), which is authorized to perform ratings in accordance with the Corporate Governance Principles of the Capital Markets Board of Türkiye (CMB), completed and announced its first Corporate Governance Rating Report for Enerjisa Enerji in 2019.

Enerjisa Enerji's first Corporate Governance Rating score was determined as 94.53 on December 19, 2019. With the second report announced on December 21, 2020, the Corporate Governance Rating score increased to 94.56. In the third report announced on December 21, 2021, it increased to 95.09. In the fourth report announced on December 21, 2022, it increased to 95.50. In the fifth report announced on December 21, 2023, it increased to 96.32. Finally in the sixth report announced on December 20, 2024, the Corporate Governance Rating score of the Company increased to 96.76.

Subcategories	Weight	2023 Rating	2024 Rating
Shareholders	25%	95.16	95.16
Public Disclosure and Transparency	25%	98.79	98.79
Shareholders	15%	99.51	99.51
Board of Directors	35%	94.02	95.27
Total	100%	96.32	96.76

AFFILIATION REPORT VIEW

Legal transactions carried out with the controlling companies and their affiliated companies for the benefit of the controlling companies or a subsidiary company with the guidance of the controlling companies, according to the conditions and conditions known to us, and all measures taken or avoided for the benefit of the controlling companies or a company affiliated to them in the operating year 2024 were evaluated in the report. We hereby declare that our company did not suffer a loss due to a transaction occurred according to the known situation and conditions related to the activity year 2024.

DUTIES OF THE MEMBERS OF THE BOARD OF DIRECTORS AND EXECUTIVES CONDUCTED OUT OF THE COMPANY

Duties of the members of the Board of Directors and Executives conducted out of the Company is reported at the Public Disclosure Platform under the "Company Management" section.

<https://www.kap.org.tr/en/sirket-bilgileri/genel/3494-enerjisa-enerji-a-s>

CORPORATE GOVERNANCE AND SUSTAINABILITY REPORTS

The Corporate Governance Principles Compliance Report and Corporate Governance Information Form for the accounting period of 2024, prepared in accordance with the Capital Markets Board's Decision dated 10.01.2019 and numbered 2/49 and approved by the Enerjisa Enerji Board of Directors Decision on 26.02.2025, were published on the Public Disclosure Platform on 26.02.2025. These reports can be found under KAP web site under Companies/BIST Companies/Enerjisa/Corporate Governance and Corporate Governance Principles Compliance Report sections.

The Sustainability Compliance Report, which shows the compliance with the principles in the CMB Sustainability Principles Compliance Framework, was also announced on the Public Disclosure Platform on 26.02.2025.



STATEMENTS OF INDEPENDENCE

STATEMENT OF INDEPENDENCE

I hereby declare that I am a candidate to serve as an “independent member” on the Board of Directors of ENERJISA ENERJİ A.Ş. (“Company”) under related regulations, Articles of Association of the Company and the criteria stated in the Corporate Governance Principles as set forth by the Capital Markets Board (“CMB”)’s Communiqué on Corporate Governance. In this regard, I declare and confirm that:

- In the last five years, I myself, my spouse or my up to the second degree blood or affinity relatives are not or have not been; employed by as a key management personnel with significant duties and responsibilities; have not had ordinary or privileged shareholding exceeding 5% either jointly or solely by myself; or have not been involved in any material business dealings with the Company, its subsidiaries and affiliates, or shareholders with management control of the Company or having material effect over the Company and all entities controlled by those shareholders,
- In the last five years, I have not been employed by as an executive having significant duties and responsibilities or have not been a member of the board or have not been a shareholder (with 5% stake or more) of an entity which has had a contractual relationship with the Company for purchase or sale of goods or services such as audit (including tax audit, legal audit, and internal audit) credit rating or consulting services during the terms in which the goods or services were provided,
- I have relevant skills, knowledge and expertise in order to duly fulfil my duties as an independent board member,
- I do not work/will not be working full-time at public institutions and organisations, except for the faculty membership provided that it is in compliance with the relevant legislation,
- I am residing in Türkiye in accordance with the Income Tax Law No. 193 dated 31/12/1960,
- I am capable to contribute positively to the operations of the Company, to maintain my objectivity in conflicts of interests between the Company and the shareholders, to have strong ethical standards, professional reputation and experience to freely take decisions by considering the rights of the stakeholders,
- I will dedicate enough time to follow up the activities of the Company and for the duly fulfilment of my responsibilities,
- I have not served as a member of the Board of the Company for more than six years within last ten years,
- I am not registered in the name of any legal entity elected as a Board member,
- I am not/will not be an independent board member in more than three of the corporations controlled by the Company or its controlling shareholders, and in more than five corporations listed on Borsa Istanbul in total.

I hereby acknowledge to the General Assembly, the Board of Directors, the shareholders and all other stakeholders of the Company that the above statements are true and correct to the best of my knowledge.

KAMURAN UÇAR

STATEMENT OF INDEPENDENCE

I hereby declare that I am a candidate to serve as an “independent member” on the Board of Directors of ENERJISA ENERJİ A.Ş. (“Company”) under related regulations, Articles of Association of the Company and the criteria stated in the Corporate Governance Principles as set forth by the Capital Markets Board (“CMB”)’s Communiqué on Corporate Governance. In this regard, I declare and confirm that:

- In the last five years, I myself, my spouse or my up to the second degree blood or affinity relatives are not or have not been; employed by as a key management personnel with significant duties and responsibilities; have not had ordinary or privileged shareholding exceeding 5% either jointly or solely by myself; or have not been involved in any material business dealings with the Company, its subsidiaries and affiliates, or shareholders with management control of the Company or having material effect over the Company and all entities controlled by those shareholders,
- In the last five years, I have not been employed by as an executive having significant duties and responsibilities or have not been a member of the board or have not been a shareholder (with 5% stake or more) of an entity which has had a contractual relationship with the Company for purchase or sale of goods or services such as audit (including tax audit, legal audit, and internal audit) credit rating or consulting services during the terms in which the goods or services were provided,
- I have relevant skills, knowledge and expertise in order to duly fulfil my duties as an independent board member,
- I do not work/will not be working full-time at public institutions and organisations, except for the faculty membership provided that it is in compliance with the relevant legislation,
- I am residing in Türkiye in accordance with the Income Tax Law No. 193 dated 31/12/1960,
- I am capable to contribute positively to the operations of the Company, to maintain my objectivity in conflicts of interests between the Company and the shareholders, to have strong ethical standards, professional reputation and experience to freely take decisions by considering the rights of the stakeholders,
- I will dedicate enough time to follow up the activities of the Company and for the duly fulfilment of my responsibilities,
- I have not served as a member of the Board of the Company for more than six years within last ten years,
- I am not registered in the name of any legal entity elected as a Board member,
- I am not/will not be an independent board member in more than three of the corporations controlled by the Company or its controlling shareholders, and in more than five corporations listed on Borsa Istanbul in total.

I hereby acknowledge to the General Assembly, the Board of Directors, the shareholders and all other stakeholders of the Company that the above statements are true and correct to the best of my knowledge.

MEHTAP ANIK ZORBOZAN



Financial Statements

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Consolidated Financial
Statements for the Year Ended
31 December 2024 and the
Independent Auditor's Report

ANNEX

Annex I: Stakeholder Management

Stakeholder Group	Stakeholder Category	Stakeholder Communication Platform and Methods	Communication Frequency	Objectives and Success Self-Evaluation Criteria
Analysts	External	Meetings, conferences, telephone calls, quarterly investor teleconferences, activities to inform analysts, podcasts, webcasts, Investor Relations website	Continuous	<ul style="list-style-type: none"> · Increasing transparency · Informing the market about the Company · Company valuation reports · Improving the Company's reputation · Financial sustainability
The Press	External	E-mail campaigns, sponsorships and sectoral events, regular and irregular press releases, press conferences, interviews	Year-round	<ul style="list-style-type: none"> · Accurately informing the public · Improving the Company's reputation and brand value · Building strong relations with members of the press
Credit Rating Agencies	External	Meetings, teleconferences and telephone calls, e-mail	Annually	<ul style="list-style-type: none"> · Increasing transparency · Ensuring a fair value for the Company's equity · Improving the Company's reputation · Financial sustainability
Financial Institutions	External	Meetings, teleconferences and phone calls, e-mail	Continuous	<ul style="list-style-type: none"> · Increasing transparency · Improving the Company's reputation · Financial sustainability · Managing sustainability risks
Shareholders	External	Board of Directors meetings, committee meetings, quarterly investor teleconferences, General Assembly Meetings, Investor Relations website	Continuous	<ul style="list-style-type: none"> · Adopting a target-based management approach · Transparently sharing the environmental performance · Compliance with Corporate Governance Principles · Financial sustainability · Improving stakeholder engagement
Public Institutions and Regulatory Bodies	External	Meetings, teleconferences and phone calls, e-mail	Continuous	<ul style="list-style-type: none"> · Increasing transparency in customer communication · Financial sustainability
People Affected by the Project (land owners/ users/ local communities)	External	Face to face meetings, e-mail, phone calls, SMS, Mobile App, communication through the website	Continuous	<ul style="list-style-type: none"> · Managing social risks of the projects and mitigating adverse impacts · Accurately informing those affected by the projects · Enhancing stakeholder engagement · Enhancing stakeholder engagement
Directly affected relevant specialists (electrical technicians/ electrical engineers)	External	Face to face meetings, phone calls, SMS, Mobile App, e-mail, communication through the website and other Enerjisa channels, authorization training for electricians	Continuous	<ul style="list-style-type: none"> · Supporting capacity building and improvement of knowledge (project design, changing legislation, etc.) · Engagement of and cooperation with authorized electrical technicians and electrical engineers
Customers	External	Customer Service Centres, Enerjisa Operation Centres, alternative sales channels, call centres, digital channels (mobile application, website), customer representatives, social media channels, SMS and customer satisfaction surveys	Continuous	<ul style="list-style-type: none"> · Developing customer-oriented solutions · Increasing customer satisfaction · Providing a continuous electricity from renewable energy resources · Providing data security · Expanding smart technologies

Stakeholder Group	Stakeholder Category	Stakeholder Communication Platform and Methods	Communication Frequency	Objectives and Success Self-Evaluation Criteria
Labor Unions	External	Face-to-face meetings, telephone calls, SMS	Continuous	<ul style="list-style-type: none"> · Collaboration for the protection and continuity of labor peace and welfare. · Managing OHS risks, strengthening OHS culture and taking action for Zero Accident Journey
NGOs	External	Conferences, management meetings, focus group activities, volunteer activities	Continuous	<ul style="list-style-type: none"> · Support and collaboration in line with our strategy, leader representation
Suppliers and Business Partners	External	Joint projects	Continuous	<ul style="list-style-type: none"> · Establishing alternative supply infrastructures for uninterrupted energy in distribution regions · Providing customer satisfaction and uninterrupted energy supply
International Organizations and Initiatives	External	Joint projects	Continuous	<ul style="list-style-type: none"> · Leadership and awareness raising on energy efficiency · Following and leading international reports, trends and developments · Collaboration for common goals
Universities	External	Joint projects	Min four times a year	<ul style="list-style-type: none"> · Collaboration with stakeholders · Attracting qualified talent · Investment in R&D
Investors	External	Informative meetings, meetings, teleconferences, quarterly investor teleconferences, podcasts, webcasts, General Assembly Meetings, Investor Relations website, online surveys	Continuous	<ul style="list-style-type: none"> · Managing sustainability risks · Adopting a target-based management approach · Transparently ESG performance · Compliance with Corporate Governance Principles · Financial sustainability
Local administrations/ Mukhtars	External	WhatsApp Mukhtar Support Line, regular meetings with mukhtars	Continuous	<ul style="list-style-type: none"> · Building stakeholder dialogue · Transparency in customer communication
Employees	Internal	iKON, mobile applications, intranet, employee engagement focus groups, team leaders' information meetings, CEO briefing meetings, management meetings, human resources meetings, Trend Talks	Continuous	<ul style="list-style-type: none"> · Attracting qualified talent · Broadening the knowledge and skills of employees, primarily blue-collar employees · Increasing employee loyalty · Investing in smart technologies · Diversity, equity and inclusion, Equal opportunities · Increasing OHS investments
Subsidiaries	Internal	Meetings, Board meetings	Continuous	<ul style="list-style-type: none"> · Promoting leadership in the use of new technologies · Managing sustainability risks · Financial sustainability

ANNEX

Annex II: Member Organizations

- 1 German - Turkish Chamber of Commerce and Industry (AHK Türkiye)
- 2 United Nations Women's Empowerment Principles (WEPs)
- 3 Association of Global Compact Signatories
- 4 The Blockchain Turkey Platform (BCTR)
- 5 Borsa İstanbul A.Ş.
- 6 World Economic Forum (WEF)
- 7 World Energy Council Türkiye
- 8 Association of Electricity Distribution System Operators (ELDER)
- 9 Emobility Operators Association (E-MOD)
- 10 Digitalization in Energy and Cyber Security Association
- 11 Energy Traders Association (ETD)
- 12 Energy Experts Association
- 13 Energy Efficiency and Management Association (EYODER)
- 14 Integrated Reporting Network Turkey (ERTA)
- 15 Ethics and Reputation Society (TEİD)
- 16 EUROGIA 2020
- 17 Business Against Domestic Violence Network
- 18 Association Of Young Executives And Business People (GYİAD)
- 19 Energy Investors Association (GÜYAD)

- 20 İstanbul Chamber of Commerce (İTO)
- 21 Business Plastic Initiative (İPG)
- 22 Business Council for Sustainable Development Türkiye (BCSD Türkiye)
- 23 Corporate Communication Professionals Association (KİD)
- 24 Central Securities Depository & Trade Repository of Türkiye (MKK)
- 25 Customer Experience Management and Technologies Association (MDYD)
- 26 Corporate Volunteers Association (ÖSGD)
- 27 Woman in Technology Association (WTECH)
- 28 The Institute of Internal Auditing-Türkiye (TİDE)
- 29 Turkish Quality Association (KALDER)
- 30 Turkish Cogeneration and Clean Energy Technologies Association
- 31 Corporate Governance Association of Türkiye (TKYD)
- 32 Turkish Industry and Business Association (TÜSİAD)
- 33 Transparency International (TI-Türkiye)
- 34 Unstereotyped Alliance Türkiye
- 35 Artificial Intelligence and Technology Association (YZTD)
- 36 Turkish Investor Relations Society (TÜYİD)
- 37 YenidenBiz Association
- 38 Board Directors Association (YUD)
- 39 30 Percent Club



ANNEX

Annex III- Environmental Performance Indicators

Total Waste Amount (ton)	2022	2023	2024
Hazardous waste	5,122	4,852	3,660.8
Recycled hazardous waste	5,122	4,852	3,565.5
Non-hazardous waste	6,279	10,427	74,314.8
Recycled non-hazardous waste	6,279	10,427	74,309.8
Total waste	11,401	15,279	77,970.6

Annex-IV: Occupational Health and Safety Indicators

OHS	2022			2023			2024		
	Enerjisa	Contractors	Consolidated	Enerjisa	Contractors	Consolidated	Enerjisa	Contractors	Consolidated
Number of critical accidents	19	7	26	21	12	33	15	8	23
TRIF (w/o STF)	4.6	4.2	4.5	5.5	5.8	5.6	5	4.9	4.6
TRIF	9.1	6	8.1	9.8	6.8	8.7	8.7	6.2	7.9
The number of fatalities due to work-related injury	1	0	1	0	0	0	1	1	2
Occupational diseases	0	0	0	0	0	0	0	0	0
Total working hours (million)	27.9	15.4	43.2	29.4	17.2	46.6	27.1	13.8	40.9

	2022	2023	2024
OHS Investments (TL million)	115.4	153.2	143.7
OHS Trainings (hour per employee)	14.1	14.7	15.4

Annex V: Social Performance Indicators

	2022		2023		2024	
Employees per Category	Female	Male	Female	Male	Female	Male
Total number of employees	1,253	10,420	1,351	10,232	1,343	9,041
White-collar employees	1,202	2,661	1,321	2,823	1,316	2,776
Blue-collar employees	51	7,759	30	7,409	27	6,265
Employees covered by collective bargaining agreements*	51	7,759	30	7,409	27	6,265
Total	11,673		11,583		10,384	

	2022		2023		2024	
Employees by Employment Types	Full-Time	Part-Time	Full-Time	Part-Time	Full-Time	Part-Time
White-collar employees	3,863	0	4,144	0	4,092	0
Blue-collar employees	7,810	0	7,439	0	6,292	0
Employees with disabilities*	337	341	312		312	
Total	11,673		11,583		10,384	

	2022		2023		2024	
Employees by Age	Female	Male	Female	Male	Female	Male
<30 years old	304	2,601	315	2,298	273	1,729
31-50 years old	930	7,517	1,014	7,579	1,039	6,915
>50 years old	19	302	22	355	31	397
Total	11,673		11,583		10,384	

	2022		2023		2024	
Parental Leave	Female	Male	Female	Male	Female	Male
Employees entitled to parental leave	92	713	52	676	36	682
Employees who returned to work following parental leave	90	713	48	674	33	681

* Not included in the total amount.

ANNEX

Annex V: Social Performance Indicators

	2022		2023		2024	
	Female	Male	Female	Male	Female	Male
Employees Who Left Work by Gender and Age						
<30 years old	25	164	29	186	29	234
31–50 years old	80	326	51	399	74	792
>50 years old	2	37	1	76	2	66
Total	107	527	81	661	105	1,092
Voluntary employee turnover	2.9%		3.4%		10.9%	

	2022		2023		2024	
	Female	Male	Female	Male	Female	Male
New Employee Hires by Gender and Age						
<30 years old	141	522	109	344	58	89
31–50 years old	87	267	70	149	35	68
>50 years old	0	4	0	1	0	1
Total	228	793	179	494	93	158

TRAINING	2022	2023	2024
Total number of employees who received training	11,497	12,458	11,769
Total training hours	483,375	405,710	405,833
Total education expenditure (TL million)	45.3	99.3	120.0

Training hour (according to employee type)	2022	2023	2024
Employees in senior management and above	743	976	1,082
Employees in middle management	9,080	9,178	9,043
Employees in junior management	23,237	28,207	25,553
Employees in specialist and below	116,363	128,837	107,611
Blue collar	333,961	238,522	262,542

Training hour (by gender)	2022	2023	2024
Female	42,716	51,731	45,710
Male	440,659	353,979	360,123

Training hour (according to training type)	2022	2023	2024
Professional Development	68,143	45,038	33,544
Technical Development	211,186	128,902	166,211
Individual Development	25,052	44,981	47,923
Leadership Development	13,058	20,242	23,911
Occupational Health and Safety	164,730	166,547	134,242

Average training hours per person	2022	2023	2024
Total per person	41.30	34.92	34.48

	2022		2023		2024	
	Female	Male	Female	Male	Female	Male
Employees in Management by Gender and Age						
<30 years old	5	7	5	9	5	6
31–49 years old	176	455	191	476	209	479
>50 years old	4	41	4	43	4	60
Board members	2	6	3	5	3	5

	2022		2023		2024		Female Ratio
	Female	Male	Female	Male	Female	Male	
Employees in All Management Positions							
Employees in junior management	127	313	134	337	142	335	29.8%
Employees in middle management	53	162	60	162	68	171	28.5%
Employees in senior management	4	21	5	23	6	23	20.7%
Executives	1	7	1	6	1	6	14.3%
Total	185	503	200	528	218	545	28.6%

	2022		2023		2024		Female Ratio
	Female	Male	Female	Male	Female	Male	
Revenue Generating Roles							
Managers in revenue generating functions	20	63	38	98	44	94	31.9%
Employees in STEM (IT, engineering, etc.) roles	152	461	183	507	177	512	25.7%

	2022	2023	2024
	Contactors by Service Type		
Number of contractors	9,079	8,167	6,083
Administrative affairs	1,007	1,142	1,069
Construction works	4,324	4,562	2,574
Fault repair and maintenance	2,848	1,452	1,335
Call Centre	900	1,011	1,015



ENERJISA ENERJİ A.Ş. AND ITS SUBSIDIARIES

Consolidated Financial Statements for
the Year Ended 31 December 2024 and the
Independent Auditor's Report

**(CONVENIENCE TRANSLATION OF
INDEPENDENT AUDITOR'S REPORT ORIGINALLY ISSUED IN TURKISH)**

INDEPENDENT AUDITOR'S REPORT

To the General Assembly of Enerjisa Enerji A.Ş.

A) Report on the Audit of the Consolidated Financial Statements

1) Opinion

We have audited the consolidated financial statements of Enerjisa Enerji A.Ş. ("the Company") and its subsidiaries (the "Group"), which comprise the consolidated statement of financial position as at 31 December 2024, and the consolidated statement of profit or loss and other comprehensive income, consolidated statement of changes in total net position and consolidated statement of cash flows for the year then ended, and notes to the consolidated financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying consolidated financial statements present fairly, in all material respects, the consolidated financial position of the Group as at 31 December 2024, and its consolidated financial performance and its consolidated cash flows for the year then ended in accordance with Turkish Financial Reporting Standards (TFRS).

2) Basis for Opinion

We conducted our audit in accordance with the standards on auditing issued by Capital Markets Board and the Standards on Independent Auditing which is a part of Turkish Auditing Standards published by the Public Oversight Accounting and Auditing Standards Authority ("POA"). Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Consolidated Financial Statements section of our report. We are independent of the Group in accordance with the Code of Ethics for Independent Auditors ("Code of Ethics") published by the POA, together with the ethical requirements that are relevant to our audit of the consolidated financial statements, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the Code of Ethics. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

3) Other Matters

The consolidated financial statements of the Group for the year ended 31 December 2023 were audited by another auditor who expressed an unqualified opinion on those statements on 8 March 2024.

4) Key Audit Matters

Key audit matters are those matters that, in our professional judgement, were of most significance in our audit of the consolidated financial statements of the current period. These matters were addressed in the context of our audit of the consolidated financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

Key Audit Matter	How the Matter was Addressed in the Audit
<p>Service Concession Arrangements" recognized within the scope of TFRS Interpretation 12 ("TFRIC"):</p> <p>The Group has applied the financial asset model for its subsidiaries in the distribution segment within the scope of TFRS Interpretation 12 "Concession Service Agreements" ("TFRS Interpretation 12") and recognized the "financial asset" related to the concession agreements in the consolidated financial statements, taking into account the terms of the service concession agreements with the government.</p> <p>The Group recognizes the income calculated according to the effective interest method over the financial assets related to concession agreements as "Interest income from service concession agreements". As of 31 December 2024, the Group has financial assets related to concession contracts amounting to TL 43,189,075 thousand in the consolidated statement of financial position and interest income from service concession contracts amounting to TL 19,750,220 thousand in the consolidated income statement between 1 January - 31 December 2024. Due to the complexity of the elements and legislation to be recognized under TFRS Interpretation 12 and the assumptions applied (which mainly include estimates of inflation rates and reasonable rate of return), this matter has therefore been identified as a key audit matter.</p> <p>Details of financial assets related to concession contracts carried within the scope of TFRS Interpretation 12 are disclosed in Note 2.9 and Note 10 to the consolidated financial statements.</p>	<p>During our audit, we performed the following procedures in relation to the "Service Concession Arrangements":</p> <ul style="list-style-type: none"> • Controls applied by the Group for the "Service Concession Agreement" were determined, these controls' designs and applications are understood, • Assessment of the compliance of the relevant calculation model with the Energy Market Regulatory Authority ("EMRA") legislation, • Checking information's on the calculation model with tariff's published by "EMRA", • Checking the mathematical accuracy of the relevant calculation model, • Checking management analyses of the sensitivity of the assumptions used to market conditions, • Testing the investments made in current period by sampling method, • Checking financial assets' maturities related to concession agreements, • Checking calculation details of expected credit losses due to concession agreements, <p>In addition to the procedures mentioned above, financial assets and interest income accounted within the scope of "Service Concession Agreement", adequacy of the disclosures in Note 10 has been evaluated within the scope of the relevant TFRSs.</p>

4) Key Audit Matters (cont'd)

Key Audit Matter	How the matter was addressed in the audit
<p>TAS 29 Financial Reporting Application in High Inflation Economies</p> <p>TAS 29, Financial Reporting in High Inflation Economies (“TAS 29”) standard has been applied in the Group's consolidated financial statements for the year ending 31 December 2024.</p> <p>In accordance with TAS 29, the consolidated financial statements and financial information of prior periods have been restated to reflect the changes in the purchasing power of the Turkish Lira and presented in terms of the purchasing power of the Turkish Lira at the reporting date. The application of TAS 29 has a significant effect on the consolidated financial statements, both on a widespread and consistent basis. Accordingly, we determined the application of TAS 29 as a key audit matter.</p> <p>The Group's accounting policies related to Financial Reporting in Hyperinflationary Economies are disclosed in Note 2.1.</p>	<p>During our audit, we performed the following audit procedures related to the application of TAS 29:</p> <ul style="list-style-type: none"> -Checking whether the distinction between monetary and non-monetary items made by management is made in accordance with TAS 29, -Testing the completeness and mathematical accuracy of the lists subject to calculation, -Evaluating the calculation methods used by management and testing their consistency, -Checking the general price index rates used in the calculations with the coefficients obtained from the Consumer Price Index in Turkey published by the Turkish Statistical Institute, <p>The adequacy of the explanations in the notes of the consolidated financial statements regarding the application of TAS 29 has been checked in accordance with TFRS.</p>

4) Key Audit Matters (cont'd)

Key Audit Matter	How the matter was addressed in the audit
<p>Goodwill Impairment Test</p> <p>As at 31 December 2024, there is goodwill amounting to 2,857,080 thousand TL in the consolidated statement of financial position as a result of previous acquisitions. The accounting policies and estimates of the Group related to the goodwill impairment tests in accordance with TAS 36 “Impairment of Assets” were disclosed in Note 2.9 and Note 2.10 in the consolidated financial statements. We focused on this matter in our audit due to the following reasons:</p> <ul style="list-style-type: none"> • Recognized goodwill is material to the Group’s consolidated financial statements as of 31 December 2024, • The use of significant management estimates and assumptions in the goodwill impairment test as disclosed in Note 2.10 and the fact that these estimates and assumptions may be affected by future sectoral and economic changes. 	<p>The audit procedures we have performed for goodwill impairment test are summarized below:</p> <ul style="list-style-type: none"> • We tested the calculations in the goodwill impairment test for mathematical accuracy. • We evaluated the estimations used in goodwill impairment test with the assistance of our valuation experts considering the independent data sources and current market conditions. • We evaluated the realization of prospective cash flow and investment expenditures projections used in the goodwill impairment test in meetings held with senior management. • We checked the compatibility of the financial statements of the base year on goodwill impairment tests with the audited financial statements. • The consistency of projections made in previous years has been compared with this year's consolidated financial statements. • The sensitivity disclosures made in relation to goodwill impairment test have been tested for mathematical accuracy and proper disclosure. • The compliance of related disclosures on the goodwill impairment testing to TFRS were evaluated



4) Key Audit Matters (cont'd)

Key Audit Matter	How the matter was addressed in the audit
<p>Revenue recognition of retail companies</p> <p>As an incumbent supply company, the Company has been authorized to sell electricity to non-eligible consumers (regulated consumers) in the distribution area, customers who have the qualification to be an eligible customer but do not use this right and to eligible customers (as a supplier of last resort) over the regulated retail sales tariff determined by the Energy Market Regulatory Authority ("EMRA"). Along with that, retail companies supply electricity to eligible customers through bilateral agreement based on free market conditions.</p> <p>The electricity sales tariffs of incumbent supply companies is determined based on the revenues from regulated consumers and the costs necessary for them to carry out their activities related to energy sales. In this context, the depreciation expenses related to investment expenditures necessary for the operation, operating costs such as billing and customer services, retail sales services, and all costs and services incurred to sustain the operation, including the amounts determined based on the gross profit margin calculated considering the risks faced, are taken into account. Therefore, the Group calculates and recognizes the revenue amount in its consolidated financial statements prepared in accordance with TFRS, based on its costs and by considering the gross profit margin set by the applicable regulations.</p> <p>Given the complexity of such transactions, we determined this matter significant to our audit and therefore considered as key audit matter.</p>	<p>The audit procedures we have performed for revenue recognition of retail companies are summarized below:</p> <p>We reviewed the customer classification used by the Company to calculate its revenue, the EMRA regulation, and the accuracy of the calculations outlined in this regulation. We also examined the calculations of the bills issued, their accuracy, and periodicity. Additionally, key controls in the information technology systems from which the data used in these calculations are sourced were designed, implemented, and tested for effectiveness, and sample tests were conducted by us. The overall consistency of the inputs subject to the calculations and the parameters used in the calculation was also evaluated by us.</p> <p>To assess the compliance of the applied calculation with both the regulation and TFRS, particular attention was given to the accounting adjustment entries related to the revenue recognition. The sources used for these entries and the consistency of the adjustment entries with prior years were also verified.</p> <p>In addition to the procedures mentioned above, the adequacy and TFRS compliance of the disclosures included in Note 19 of the financial statements were also evaluated.</p>



4) Key Audit Matters (cont'd)

Key Audit Matter	How the matter was addressed in the audit
<p>Recoverability of deferred tax assets</p> <p>The Group recognized a material amount of deferred tax assets in the consolidated statement of financial position as of 31 December 2024. The recoverable amount of the deferred tax assets was estimated based on the Group management's current assumptions and future business plans.</p> <p>Due to the significance of the deferred tax assets recognized in the consolidated statement of financial position for the respective periods, the recoverability of these assets has been identified as a key audit matter.</p> <p>The details regarding the accounting policies and estimates applied by the Group in the calculation of deferred tax are disclosed in Note 2.9 and Note 2.10.</p>	<p>The audit procedures we have performed for recoverability of deferred tax are summarized below:</p> <ul style="list-style-type: none"> Prospective cash and profit projections have been obtained from the Group management and checked the calculations for mathematical accuracy. Significant estimates used in the aforementioned projections and the reasonableness of these estimations was evaluated in meetings with Group management. The macroeconomic data used in the projections were evaluated for reasonableness by comparing them with details obtained from external sources. <p>In addition to the procedures mentioned above, the adequacy of the disclosures related to the amounts recognized as deferred tax, disclosures in Note 25 has been evaluated within the scope of the relevant TFRSs.</p>

5) Responsibilities of Management and Those Charged with Governance for the Consolidated Financial Statements

The Group management is responsible for the preparation and fair presentation of the consolidated financial statements in accordance with TFRS, and for such internal control as management determines is necessary to enable the preparation of consolidated financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the consolidated financial statements, management is responsible for assessing the Group's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Group or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Group's financial reporting process.

6) Auditor's Responsibilities for the Audit of the Consolidated Financial Statements

Responsibilities of independent auditors in an independent audit are as follows:

Our objectives are to obtain reasonable assurance about whether the consolidated financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with the standards on auditing issued by Capital Markets Board and SIA will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these consolidated financial statements.

As part of an audit in accordance with the standards on auditing issued by Capital Markets Board and SIA, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the consolidated financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Group's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.

6) Auditor's Responsibilities for the Audit of the Consolidated Financial Statements (cont'd)

- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Group to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the consolidated financial statements, including the disclosures, and whether the consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
- Obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Group to express an opinion on the consolidated financial statements. We are responsible for the direction, supervision and performance of the Group audit. We remain solely responsible for our audit opinion.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the consolidated financial statements of the current period and are therefore the key audit matters. We describe, these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.



ENERJISA ENERJİ A.Ş. AND ITS SUBSIDIARIES

B) Report on Other Legal and Regulatory Requirements

In accordance with paragraph four of the article 398 of the Turkish Commercial Code No. 6102 (“TCC”), the auditor’s report on the system and the committee of early detection of risk has been submitted to the Board of Directors of the Company on 26 February 2025.

In accordance with paragraph four of the article 402 of TCC, nothing has come to our attention that may cause us to believe that the Group’s set of accounts and financial statements prepared for the period 1 January-31 December 2024 does not comply with TCC and the provisions of the Company’s articles of association in relation to financial reporting.

In accordance with paragraph four of the Article 402 of TCC, the Board of Directors provided us all the required information and documentation with respect to our audit.

The engagement partner on the audit resulting in this independent auditor’s report is Emrehan Demirel.

DRT BAĞIMSIZ DENETİM VE SERBEST MUHASEBECİ MALİ MÜŞAVİRLİK A.Ş.
Member of **DELOITTE TOUCHE TOHMATSU LIMITED**

Emrehan Demirel
Partner

Ankara, 26 February 2025

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ENERJISA ENERJİ A.Ş. AND ITS SUBSIDIARIES

CONSOLIDATED STATEMENT OF FINANCIAL POSITION AS AT 31 DECEMBER 2024

(Amounts expressed in thousands of Turkish Lira ("TL") in terms of purchasing power of the TL at 31 December 2024 unless otherwise indicated. Currencies other than TL are also expressed in thousands unless otherwise indicated.)

ASSETS	Notes	Audited / current period 31 December 2024	Audited / prior period 31 December 2023
Current Assets		51,389,505	58,741,938
Cash and Cash Equivalents	29	9,487,867	6,498,842
Financial Assets from			
Service Concession Arrangements	10	8,670,918	8,604,215
Trade Receivables	6	20,452,278	22,426,444
<i>Due from Related Parties</i>	5	158,296	152,334
<i>Due from Third Parties</i>		20,293,982	22,274,110
Other Receivables	7	6,222,320	7,912,888
<i>Due from Third Parties</i>		6,222,320	7,912,888
Derivative Financial Instruments	27	9,595	823,203
Inventory	8	3,853,783	5,698,047
Prepaid Expenses	9	1,200,498	2,045,808
Assets Related with Current Taxes	25	32,244	1,366,480
Other Current Assets	17	1,460,002	3,366,011
Non-Current Assets		128,362,873	131,977,231
Trade Receivables	6	5,622,657	1,188,032
<i>Due from Related parties</i>	5	66,595	109,751
<i>Due from Third parties</i>		5,556,062	1,078,281
Other Receivables	7	6,260,848	3,407,904
<i>Due from Third Parties</i>		6,260,848	3,407,904
Derivative Financial Instruments	27	-	6,844
Financial Assets from			
Service Concession Arrangements	10	34,518,157	37,247,894
Right of Use Assets	11	1,140,517	1,284,219
Property, Plant and Equipment	12	9,954,888	9,513,832
Intangible Assets	13	46,325,085	48,778,009
<i>Goodwill</i>		2,857,080	2,857,080
<i>Other Intangible Assets</i>		43,468,005	45,920,929
Prepaid Expenses	9	156,561	146,760
Deferred Tax Assets	25	24,363,023	30,363,907
Other Non-Current Assets	17	21,137	39,830
TOTAL ASSETS		179,752,378	190,719,169

The accompanying notes form an integral part of these consolidated financial statements.

ENERJISA ENERJİ A.Ş. AND ITS SUBSIDIARIES

CONSOLIDATED STATEMENT OF FINANCIAL POSITION AS AT 31 DECEMBER 2024

(Amounts expressed in thousands of Turkish Lira ("TL") in terms of purchasing power of the TL at 31 December 2024 unless otherwise indicated. Currencies other than TL are also expressed in thousands unless otherwise indicated.)

LIABILITIES	Notes	Audited / current period 31 December 2024	Audited / prior period 31 December 2023
Current Liabilities		67,578,894	69,307,578
Short-Term Financial Liabilities	26	6,079,993	10,451,822
Short-Term Portion of Long Term Financial Liabilities	26	23,836,390	18,669,039
Other Financial Liabilities	26	165,390	202,019
Trade Payables	6	19,849,637	23,402,737
<i>Due to Related Parties</i>	5	292,519	213,639
<i>Due to Third Parties</i>		19,557,118	23,189,098
Payables for Employee Benefits	16	1,242,294	966,461
Other Payables	7	13,114,140	12,980,145
<i>Due to Related Parties</i>	5	-	29,886
<i>Due to Third Parties</i>		13,114,140	12,950,259
Derivative Financial Instruments	27	364,449	65,235
Deferred Income	9	53,701	45,631
Income Tax Liability	25	266,844	52,815
Short-Term Provisions		1,573,437	1,583,783
<i>Provisions for Employment Benefits</i>	16	667,178	646,642
<i>Other Short-Term Provisions</i>	14	906,259	937,141
Other Short-Term Liabilities	17	1,032,619	887,891
Non-Current Liabilities		37,717,456	37,997,525
Long-Term Financial Liabilities	26	24,034,685	19,031,179
Other Financial Liabilities	26	696,231	1,110,896
Deferred Income	9	9,351	4,479,513
Long-Term Provisions		1,980,474	1,948,028
<i>Provisions for Employment Benefits</i>	16	1,980,474	1,948,028
Deferred Tax Liabilities	25	10,996,715	11,427,909
TOTAL LIABILITIES		105,296,350	107,305,103

The accompanying notes form an integral part of these consolidated financial statements.

ENERJISA ENERJİ A.Ş. AND ITS SUBSIDIARIES

CONSOLIDATED STATEMENT OF FINANCIAL POSITION AS AT 31 DECEMBER 2024

(Amounts expressed in thousands of Turkish Lira ("TL") in terms of purchasing power of the TL at 31 December 2024 unless otherwise indicated. Currencies other than TL are also expressed in thousands unless otherwise indicated.)

	Notes	Audited / current period 31 December 2024	Audited / prior period 31 December 2023
LIABILITIES			
Equity		74,456,028	83,414,066
Registered Share Capital	18	1,181,069	1,181,069
Adjustments to Share Capital	18	13,488,262	13,488,262
Share Premium	18	29,681,065	31,353,365
Total Share Capital		44,350,396	46,022,696
Other Funds		23,080	23,080
Accumulated Other Comprehensive Income / (Expense) to be Reclassified to Profit or Loss in Subsequent Periods		(29,582)	68,383
<i>Hedge Reserves</i>		(29,582)	68,383
Restricted Profit Reserves	18	3,447,044	3,560,121
Retained Earnings		31,517,873	27,217,726
Profit / (Loss) for the Period		(4,852,783)	6,522,060
TOTAL LIABILITIES AND EQUITY		179,752,378	190,719,169

The accompanying notes form an integral part of these consolidated financial statements.

ENERJISA ENERJİ A.Ş. AND ITS SUBSIDIARIES

CONSOLIDATED STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME FOR THE YEAR ENDED 31 DECEMBER 2024

(Amounts expressed in thousands of Turkish Lira ("TL") in terms of purchasing power of the TL at 31 December 2024 unless otherwise indicated. Currencies other than TL are also expressed in thousands unless otherwise indicated.)

	Notes	Audited / current period 1 January - 31 December 2024	Audited/ prior period 1 January - 31 December 2023
Revenue	19	190,584,779	243,515,934
Cost of Sales (-)	20	(147,860,380)	(206,620,691)
GROSS PROFIT		42,724,399	36,895,243
General Administrative Expenses (-)	21	(16,219,046)	(16,605,300)
Other Income from Operating Activities	22	7,710,069	10,539,249
Other Expenses from Operating Activities (-)	22	(6,616,816)	(9,322,566)
OPERATING PROFIT BEFORE FINANCE INCOME / (EXPENSE)		27,598,606	21,506,626
Finance Income	23	2,835,231	2,835,297
Finance Expense (-)	23	(23,097,064)	(13,780,194)
Monetary Gain / (Loss)	24	(4,593,936)	(2,955,175)
PROFIT BEFORE TAX		2,742,837	7,606,554
Tax Income / (Expense)		(7,595,620)	(1,084,494)
Current Tax Income / (Expense)	25	(1,992,031)	(540,085)
Deferred Tax Income / (Expense)	25	(5,603,589)	(544,409)
PROFIT / (LOSS) FOR THE PERIOD		(4,852,783)	6,522,060
OTHER COMPREHENSIVE INCOME AND EXPENSE			
Other Comprehensive Income / (Expense) to be Reclassified to Profit or Loss in Subsequent Periods		(97,965)	(2,314,475)
<i>Gains / (Losses) on Hedges</i>		(131,864)	(3,043,594)
<i>Income Tax Relating to Other Comprehensive Income</i>	25	33,899	729,119
TOTAL COMPREHENSIVE INCOME / LOSS		(4,950,748)	4,207,585
Gain / (Loss) Per Share (kr)			
Gain / (Loss) Per Share (kr)	18	(4.11)	5.52

The accompanying notes form an integral part of these consolidated financial statements.

CONSOLIDATED STATEMENT OF CHANGES IN EQUITY FOR THE YEAR ENDED 31 DECEMBER 2024

(Amounts expressed in thousands of Turkish Lira ("TL") in terms of purchasing power of the TL at 31 December 2024 unless otherwise indicated. Currencies other than TL are also expressed in thousands unless otherwise indicated.)

	Share Capital	Adjustment to Share Capital	Share premium	Restricted Profit Reserves	Other Funds	Hedge Reserves	Retained Earnings	Profit / (Loss) for the Period	Total Equity
Balance as at 1 January 2023	1,181,069	13,488,262	32,163,507	3,367,145	23,080	2,382,858	2,551,860	29,791,925	84,949,706
Transfers (*)	-	-	(810,142)	192,976	-	-	30,409,091	(29,791,925)	-
Dividend	-	-	-	-	-	-	(5,743,225)	-	(5,743,225)
Total comprehensive income	-	-	-	-	-	(2,314,475)	-	6,522,060	4,207,585
Balance as at 31 December 2023	1,181,069	13,488,262	31,353,365	3,560,121	23,080	68,383	27,217,726	6,522,060	83,414,066
Balance as at 1 January 2024	1,181,069	13,488,262	31,353,365	3,560,121	23,080	68,383	27,217,726	6,522,060	83,414,066
Transfers (*)	-	-	(1,672,300)	(113,077)	-	-	8,307,437	(6,522,060)	-
Dividend (**)	-	-	-	-	-	-	(4,007,290)	-	(4,007,290)
Total comprehensive loss	-	-	-	-	-	(97,965)	-	(4,852,783)	(4,950,748)
Balance as at 31 December 2024	1,181,069	13,488,262	29,681,065	3,447,044	23,080	(29,582)	31,517,873	(4,852,783)	74,456,028

(*) During the Ordinary General Assembly held on 4 April 2024, share premiums amounting to TL 1,672,300 has been transferred to retained earnings and subject to dividend distribution (31 December 2023: TL 810,142).

(**) During the Ordinary General Assembly held on 4 April 2024, it has been resolved to distribute the dividend at the amount of TL 4,007,290 (As of Board of Directors decision date: TL 3,295,182) derived from the Group's distributable earnings in 2023. Dividends were paid out in cash as of 6 May 2024. Dividend paid by the Group per share with a TL 1 (full digit) nominal value is gross TL 2.79 (full digit) (2023: TL 2.30 (full digit)).

The accompanying notes form an integral part of these consolidated financial statements.

ENERJISA ENERJİ A.Ş. AND ITS SUBSIDIARIES

CONSOLIDATED STATEMENT OF CASH FLOWS FOR THE YEAR ENDED 31 DECEMBER 2024

(Amounts expressed in thousands of Turkish Lira ("TL") in terms of purchasing power of the TL at 31 December 2024 unless otherwise indicated. Currencies other than TL are also expressed in thousands unless otherwise indicated.)

	Notes	Audited / current period 1 January - 31 December 2024	Audited / prior period 1 January - 31 December 2023
Cash Flows from Operating Activities		24,622,769	9,341,492
Profit / (loss) for the period		(4,852,783)	6,522,060
Profit / (loss) for the period		(4,852,783)	6,522,060
Adjustments to reconcile net profit for the period		14,114,291	(2,563,311)
Adjustments related to the depreciation and amortization	11, 12, 13	4,746,512	4,805,363
Adjustments related to the depreciation of right of use assets	11	737,219	974,609
Adjustments related to the depreciation of property, plant and equipment	12	1,073,610	917,631
Adjustments related to the amortization of intangible assets	13	2,935,683	2,913,123
Adjustments related to impairment loss		2,554,367	3,986,722
Adjustments related to doubtful provision expenses	6, 10	2,554,367	3,986,722
Adjustments related to provisions		2,537,863	2,383,242
Adjustments related to provisions for employee benefits	16	2,242,673	1,869,792
Adjustments related to legal case provisions	14	211,594	513,450
Adjustments related to other provisions	14	83,596	-
Adjustments related to interest (income) and expenses, net		19,784,418	10,720,564
Adjustments related to interest income	23	(2,835,231)	(2,835,297)
Adjustments related to interest expense	23	22,619,649	13,555,861
Adjustments related to unrealized foreign exchange loss		(78,714)	835,308
Adjustments related to tax expense	25	7,595,620	1,084,494
Adjustments related to change in fair value losses / (gains)		777,931	(779,667)
Other adjustments to reconcile profit / (loss)	29	(24,251,896)	(22,990,572)
Adjustments related to interest (income) / expense from tariff receivables	22	(4,501,676)	(1,815,713)
Adjustments related to financial income from service concession arrangements	10, 19	(19,750,220)	(21,174,859)
Monetary (gains) / losses		448,190	(2,608,765)
Changes in operating assets and liabilities		(5,417,016)	(6,949,689)
(Increase) / decrease in trade receivables		(9,346,074)	(17,038,879)
(Increase) / decrease in inventories		92,813	(2,982,066)
(Increase) / decrease in other receivables and assets		(3,602,746)	(6,557,718)
Increase / (decrease) in trade payables		3,537,372	13,646,924
Increase / (decrease) in other payables and expense accruals		3,901,619	5,982,050
Cash generated from/(used in) operating activities		3,844,492	(2,990,940)
Payments related with provisions for employee benefits	16	(1,266,422)	(931,110)
Tax payments		(1,115,961)	(4,546,124)
Interest received / (paid)		656,695	(943,091)
Other cash in-flows	29	22,503,965	18,752,757
Capital expenditures reimbursements related to service concession arrangements	10	12,996,100	12,265,746
WACC reimbursements related to service concession arrangements	10	7,557,674	7,346,397
Prior tariff adjustments related to service concession arrangements	10	1,027,815	(1,431,140)
Collections from doubtful trade receivable	6	922,376	571,754
Cash Flows from Investing Activities		(16,048,264)	(20,926,191)
Cash used for purchase of tangible and intangible assets		(2,037,822)	(3,038,056)
Interest received		2,649,960	3,430,767
Other cash out-flows	29	(16,660,402)	(21,318,902)
Capital expenditures related to service concession arrangements		(16,660,402)	(21,318,902)
Cash Flows from Financing Activities		(3,587,883)	5,997,613
Cash in-flows from borrowings	26	43,925,393	52,467,628
Cash out-flows for borrowings	26	(21,618,112)	(30,119,159)
Repayment of of lease liabilities	26	(700,929)	(664,450)
Interest paid		(21,186,945)	(9,943,181)
Dividend paid		(4,007,290)	(5,743,225)
Increase / (decrease) in cash and cash equivalents		4,986,622	(5,587,086)
Inflation impact on cash and cash equivalents		(1,997,597)	(7,828,408)
Cash and cash equivalents at the beginning of the period		6,498,842	19,914,336
Cash and cash equivalents at the end of the period		9,487,867	6,498,842

The accompanying notes form an integral part of these consolidated financial statements.

ENERJISA ENERJİ A.Ş. AND ITS SUBSIDIARIES

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2024

(Amounts expressed in thousands of Turkish Lira ("TL") in terms of purchasing power of the TL at 31 December 2024 unless otherwise indicated. Currencies other than TL are also expressed in thousands unless otherwise indicated.)

NOTE 1 - ORGANIZATION AND NATURE OF OPERATIONS OF THE GROUP

Enerjisa Enerji A.Ş. (the "Company") and its subsidiaries will be referred as the "Group" for consolidated financial statements. The Company is established on 26 December 2011 as a joint venture between Hacı Ömer Sabancı Holding A.Ş. ("Sabancı") and Verbund International GmbH ("Verbund International"). On 4 December 2012, Verbund and DD Turkey Holdings S.A.R.L., E.ON SE ("E.ON") signed a Share Purchase Agreement for the sales and transfer of all Verbund shares in the Company to E.ON and the transfer is finalized on 24 April 2013.

On 27 April 2023, DD Turkey Holdings S.A.R.L. ("DD Turkey") has 40% shares in the Company, have signed a share transfer agreement regarding the transfer of shares to E.ON International Participations N.V (EIP), which is also an E.ON group company and incorporated in the Netherlands. Accordingly, Company shares, which are held by DD Turkey, are transferred to EIP, another E.ON group company, which has the same controlling structure, without any change in control. Above mentioned transaction is part of a corporate internal restructuring due to sole technical reasons within E.ON group. Following the transfer of shares, E.ON group still holds 40% of Company shares. Thus, there is no change in Company's ultimate shareholding structure.

The Company is registered to the Capital Markets Board ("CMB") and its shares are publicly traded in Borsa İstanbul A.Ş. ("BIST") with ticker "ENJSA.E" since 8 February 2018. The Company is registered in Türkiye and the address of the headquarters is as follows:

Barbaros Mahallesi, Begonya Sokak, Nida Kule Ataşehir Batı Sit. No: 1/1, Ataşehir / İstanbul, Türkiye.

The Company served as the parent company for generation, trading, sale, distribution and retail service of electricity business lines until 25 August 2017. On 28 April 2017 as the first stage of the reorganization, the Company merged with Enerjisa Elektrik Dağıtım A.Ş. ("EEDAŞ") by taking over its all assets and liabilities along with its subsidiaries (distribution and retail service companies). On 25 August 2017 as the second stage of the reorganization, the Company transferred three subsidiaries (electricity generation, wholesale trading and natural gas trading) by spin-off method with the carrying amounts to a newly established company called Enerjisa Üretim Santralleri A.Ş. ("EÜSAŞ"). On 25 September 2017, the Company has sold its subsidiary which operates in solar energy generation to the generation company that is owned by EÜSAŞ. As a result of these transactions, the Company's main activities under the new structure are customer-focused electricity distribution and retail service. In addition to electricity distribution and retail services, the Company is also involved in customer solutions, renewable energy and energy efficiency solutions businesses and the operation of the charging network for electric vehicles and the supply of charging station equipment.

Subsidiaries consolidated in the consolidated financial statements as of 31 December 2024 and their activities are as follows:

Başkent Elektrik Dağıtım A.Ş. ("BAŞKENT EDAŞ")	Distribution of electricity
İstanbul Anadolu Yakası Elektrik Dağıtım A.Ş. ("AYEDAŞ")	Distribution of electricity
Toroslar Elektrik Dağıtım A.Ş. ("TOROSLAR EDAŞ")	Distribution of electricity
Enerjisa Başkent Elektrik Perakende Satış A.Ş. ("EPS")	Retail service of electricity
Enerjisa İstanbul Anadolu Yakası Elektrik Perakende Satış A.Ş. ("AYESAŞ")	Retail service of electricity
Enerjisa Toroslar Elektrik Perakende Satış A.Ş. ("TOROSLAR EPSAŞ")	Retail service of electricity
Enerjisa Müşteri Çözümleri A.Ş. ("EMÇ")	Renewable energy and energy efficiency solutions
E-şarj Elektrikli Araçlar Şarj Sistemleri A.Ş. ("E-şarj")	Electric vehicles and charging stations services
Enerjisa Araç Filo Hizmetleri A.Ş.	Operational car rental and fleet services

ENERJISA ENERJİ A.Ş. AND ITS SUBSIDIARIES

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2024

(Amounts expressed in thousands of Turkish Lira ("TL") in terms of purchasing power of the TL at 31 December 2024 unless otherwise indicated. Currencies other than TL are also expressed in thousands unless otherwise indicated.)

NOTE 1 - ORGANIZATION AND NATURE OF OPERATIONS OF THE GROUP (Continued)

The Group's operations are carried out only in Türkiye.

The Group has 10,384 employees as of 31 December 2024 (31 December 2023: 11,583).

The consolidated financial statements were authorized for issue by the Board of Directors of the Company on 26 February 2025. The General Assembly and certain regulatory bodies have the power to amend the consolidated financial statements after the issue.

BASKENT EDAS and EPS

100% shares of BAŞKENT EDAŞ has been acquired by EEDAŞ as of 28 January 2009 by privatization bid for the consideration of USD 1,225 million. BAŞKENT EDAŞ currently operates in 7 provinces including Ankara, Kırıkkale, Kastamonu, Zonguldak, Bartın, Çankırı and Karabük and holds the licence that gives the right for distribution of electricity in these provinces for 30 years starting from the date of Transfer of Operation Rights ("TOR") agreement signed with Türkiye Elektrik Dağıtım A.Ş. ("TEDAŞ") on 31 March 2006.

As of 1 January 2013, BAŞKENT EDAŞ is obliged to carry out the distribution and the retail sales activities under separate legal entities in accordance with Electricity Market Law. On 12 September 2012, EPS was established with the same shareholder structure and as of 31 December 2012, BAŞKENT EDAŞ has transferred some of its assets and liabilities to EPS, due to the fact that, legal unbundling and the unbundling related transactions have been registered as of 31 December 2012. Starting from 1 January 2013, BAŞKENT EDAŞ has undertaken only the distribution activities. In addition, with the new regulation applied by Energy Market Regulatory Authority ("EMRA"), BAŞKENT EDAŞ started retail sales only for illumination customers starting from 1 April 2013.

AYEDAŞ and AYESAŞ

AYEDAŞ has been acquired by EEDAŞ as of 31 July 2013 by privatization bid for the consideration of USD 1,227 million. AYEDAŞ currently operates in Anatolian Side of İstanbul and holds the license that gives the right for distribution of electricity in this province until 31 December 2042 starting from the date of TOR agreement signed with TEDAŞ on 24 July 2006.

As of 1 January 2013, AYEDAŞ is obliged to carry out the distribution and the retail sales activities under separate legal entities in accordance with Electricity Market Law. On 13 December 2012, AYESAŞ was established with the same shareholder structure and as of 31 December 2012, AYEDAŞ has transferred some of its assets and liabilities to AYESAŞ due to the legal unbundling. The aforementioned unbundling transactions have been registered as of 31 December 2012 and AYESAŞ started retail sales operations on 1 January 2013 according to the Retail Sales License obtained due to unbundling. Starting from 1 January 2013, AYEDAŞ has undertaken only distribution activities. In addition, with the new regulation applied by EMRA, AYEDAŞ started retail sales only for illumination customers starting from 1 April 2013.

TOROSLAR EDAS and TOROSLAR EPSAS

TOROSLAR EDAŞ has been acquired by EEDAŞ as of 30 September 2013 by privatization bid for the consideration of USD 1,725 million. TOROSLAR EDAŞ currently operates in Adana, Gaziantep, Hatay, Kilis, Mersin and Osmaniye and holds the license that gives the right for distribution of electricity in these provinces until 31 December 2042 starting from the date of TOR agreement signed with TEDAŞ on 24 July 2006.

ENERJISA ENERJİ A.Ş. AND ITS SUBSIDIARIES

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2024

(Amounts expressed in thousands of Turkish Lira ("TL") in terms of purchasing power of the TL at 31 December 2024 unless otherwise indicated. Currencies other than TL are also expressed in thousands unless otherwise indicated.)

NOTE 1 - ORGANIZATION AND NATURE OF OPERATIONS OF THE GROUP (Continued)

TOROSLAR EDAS and TOROSLAR EPSAŞ (Continued)

As of 1 January 2013, TOROSLAR EDAS is obliged to carry out the distribution and the retail sales activities under separate legal entities in accordance with Electricity Market Law. On 13 December 2012, TOROSLAR EPSAŞ was established with the same shareholder structure and as of 31 December 2012, TOROSLAR EDAS has transferred some of its assets and liabilities to TOROSLAR EPSAŞ due to the legal unbundling. The aforementioned unbundling transactions have been registered as of 31 December 2012 and TOROSLAR EPSAŞ started retail sales operations on 1 January 2013 according to the Retail Sales License obtained due to unbundling. Starting from 1 January 2013, TOROSLAR EDAS has undertaken only distribution activities. In addition, with the new regulation applied by EMRA, TOROSLAR EDAS started retail sales only for illumination customers starting from 1 April 2013.

EMRA has set a unique pricing mechanism for all of the electricity distribution companies in Türkiye. In accordance with this pricing mechanism, EMRA determines the regional tariffs for distribution companies in Türkiye. EMRA has announced new tariffs for the period between 2011 and 2015 in December 2010; for the period between 2016 and 2020 in December 2015; and for the period between 2021 and 2025 in December 2020.

Toroslar EDAS, which operates in Adana, Gaziantep, Hatay, Kilis, Mersin and Osmaniye provinces, was directly affected by the earthquakes that occurred in Kahramanmaraş province on 6 February 2023. In accordance with the decision taken by EMRA, regions directly affected by the disaster are supported by the price equalization mechanism via making assumptions on energy volumes and revenues. It was decided that the earthquake disaster is considered among the extraordinary circumstances regulated in Article 16 of the Electricity Market Tariff Regulation published in the Official Gazette dated 19 June 2020 and numbered 31160, and in this context, the necessary expenses to be incurred by distribution companies due to the effects of earthquakes are generally accepted as uncontrollable operating expenses within the scope of the fourth paragraph of Article 8 of the Communiqué on the Regulation of Distribution Tariff published in the Official Gazette dated 19 November 2020 and numbered 31309, provided that the relevant conditions are met. Negotiations with EMRA regarding the relevant processes are ongoing. The Company's operational activities are secured by the relevant regulations.

Enerjisa Müşteri Çözümleri A.Ş.

Enerjisa Müşteri Çözümleri A.Ş. was established on 29 December 2017, in order to conduct activities in customer solutions, renewable energy and energy efficiency solutions.

E-şarj

Enerjisa Müşteri Çözümleri A.Ş., acquired 80% of the shares of E-şarj on 26 April 2018 and 14% shares on 3 December 2021.

Enerjisa Müşteri Çözümleri A.Ş. has acquired remaining 6% of the shares of E-şarj Elektrikli Araçlar Şarj Sistemleri A.Ş. based on Board of Directors decision dated 27 July 2023. Following transaction, Enerjisa Müşteri Çözümleri A.Ş. has become 100% shareholder of E-şarj.

E-şarj is mainly involved in the operation of charging network for electric vehicles and supply of charging stations equipment.

Enerjisa Araç Filo Hizmetleri A.Ş.

Enerjisa Araç Filo Hizmetleri A.Ş. was established on 14 May 2024 to provide comprehensive services for customers in the operational vehicle rental and fleet services sector.

ENERJISA ENERJİ A.Ş. AND ITS SUBSIDIARIES

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2024

(Amounts expressed in thousands of Turkish Lira ("TL") in terms of purchasing power of the TL at 31 December 2024 unless otherwise indicated. Currencies other than TL are also expressed in thousands unless otherwise indicated.)

NOTE 2 - BASIS OF PRESENTATION OF CONSOLIDATED FINANCIAL STATEMENTS

2.1 Basis of Presentation

The accompanying consolidated financial statements are prepared in accordance with the requirements of Capital Markets Board ("CMB") Communiqué Serial II, no: 14.1 "Basis of Financial Reporting in Capital Markets", which was published in the Official Gazette No: 28676 on 13 June 2013. The accompanying consolidated financial statements have been prepared in accordance with Turkish Financial Reporting Standards ("TFRS") and interpretations regarding these standards that have been put into effect by Public Oversight Accounting and Auditing Standards Authority of Türkiye ("POA") under Article 5 of the Communiqué. TFRS is updated through communiqués to be in line with the changes in International Financial Reporting Standards ("IFRS").

Financial reporting in hyperinflationary economy

The consolidated financial statements and related amounts for prior periods have been restated for changes in general purchasing power of the functional currency and, as a result, are expressed in terms of the current measuring unit at the end of the reporting period in accordance with TAS 29 "Financial Reporting in Hyperinflationary Economies" standard.

TAS 29 applies to the financial statements, including the consolidated financial statements, of each entity whose functional currency is the currency of a hyperinflationary economy. If an economy is subject to hyperinflation, TAS 29 requires an entity whose functional currency is the currency of a hyperinflationary economy to present its financial statements in terms of the measuring unit current at the end of the reporting period.

As at the reporting date, entities operating in Türkiye are required to apply TAS 29 "Financial Reporting in Hyperinflationary Economies" for the reporting periods ending on or after 31 December 2023, as the cumulative change in the general purchasing power of the last three years based on the Consumer Price Index ("CPI") is more than 100%. POA made an announcement on 23 November 2023 regarding the scope and application of TAS 29. It stated that the financial statements of the entities applying Turkish Financial Reporting Standards for the annual reporting period ending on or after 31 December 2023 should be presented in accordance with the related accounting principles in TAS 29, adjusted for the effects of inflation.

In accordance with the CMB's decision dated 28 December 2023 and numbered 81/1820, issuers and capital market institutions subject to financial reporting regulations applying Turkish Accounting/Financial Reporting Standards are required to apply inflation accounting by applying the provisions of TAS 29 to their annual financial statements for the accounting periods ending on 31 December 2023. The Group has applied IAS 29 "Financial Reporting in Hyperinflationary Economies" Standard in its consolidated financial statements prepared in accordance with International Financial Reporting Standards ("IFRS") as of and for the year end 31 December 2022. Therefore, the Group's first application date of TMS 29 has been determined as 1 January 2021.

As of 1 January 2021, retained earnings were amounting TL 3,297,321 before the adjustments made in accordance with TAS 29. As of 1 January 2021, restated amount of retained earnings after the adjustments made in accordance with TAS 29 is TL 5,284,102 with the purchasing power of 31 December 2024.

In this framework, while preparing the consolidated financial statements dated 31 December 2024, inflation adjustment has been made in accordance with TAS 29.

ENERJISA ENERJİ A.Ş. AND ITS SUBSIDIARIES

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS
FOR THE YEAR ENDED 31 DECEMBER 2024

(Amounts expressed in thousands of Turkish Lira ("TL") in terms of purchasing power of the TL at 31 December 2024 unless otherwise indicated. Currencies other than TL are also expressed in thousands unless otherwise indicated.)

NOTE 2 - BASIS OF PRESENTATION OF CONSOLIDATED FINANCIAL STATEMENTS
(Continued)

2.1 Basis of Presentation (Continued)

Financial reporting in hyperinflationary economy (continued)

The table below shows the inflation rates for the relevant years calculated by taking into account the Consumer Price Indices published by the Turkish Statistical Institute ("TURKSTAT"):

Date	Index	Adjustment Coefficient	Three -years compound inflation rates
31 December 2024	2,684.55	1.00000	291%
31 December 2023	1,859.38	1.44379	268%
31 December 2022	1,128.45	2.37897	156%

The main lines of TAS 29 indexation transactions are as follows:

- As of the balance sheet date, all items other than those stated in terms of current purchasing power are restated by using the relevant price index coefficients. Prior year amounts are also restated in the same way.
- Monetary assets and liabilities are expressed in terms of the purchasing power at the balance sheet date and are therefore not subject to restatement. Monetary items are cash and items to be received or paid in cash.
- Fixed assets, subsidiaries and similar assets are indexed to their acquisition values, which do not exceed their market values. Depreciation has been adjusted in a similar manner. Amounts included in shareholders' equity have been restated by applying general price indices for the periods in which they were contributed to or arose within the Company.
- All items in the income statement, except for the effects of non-monetary items in the balance sheet on the income statement, have been restated by applying the multiples calculated over the periods when the income and expense accounts were initially recognized in the financial statements.
- The gain or loss arising on the net monetary position as a result of general inflation is the difference between the adjustments to non-monetary assets, equity items and income statement accounts. This gain or loss on the net monetary position is included in net profit.

The impact of the application of TAS 29 Inflation Accounting is summarized below:

Restatement of the Statement of Financial Position

Amounts in the statement of financial position that are not expressed in terms of the measuring unit current at the end of the reporting period are restated. Accordingly, monetary items are not restated because they are expressed in the currency of the reporting period. Non-monetary items are required to be restated unless they are expressed in terms of the currency in effect at the end of the reporting period. The gain or loss on the net monetary position arising on restatement of non-monetary items is recognized in profit or loss and presented separately in the statement of comprehensive income.

ENERJISA ENERJİ A.Ş. AND ITS SUBSIDIARIES

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS
FOR THE YEAR ENDED 31 DECEMBER 2024

(Amounts expressed in thousands of Turkish Lira ("TL") in terms of purchasing power of the TL at 31 December 2024 unless otherwise indicated. Currencies other than TL are also expressed in thousands unless otherwise indicated.)

NOTE 2 - BASIS OF PRESENTATION OF CONSOLIDATED FINANCIAL STATEMENTS
(Continued)

2.1 Basis of Presentation (Continued)

Financial reporting in hyperinflationary economy (continued)

Restatement of the Statement of Profit or Loss

All items in the statement of profit or loss are expressed in terms of the measuring unit current at the end of the reporting period. Therefore, all amounts have been restated by applying changes in the monthly general price index.

Restatement of Statement of Cash Flows

All items in the statement of cash flows are expressed in terms of the measuring unit current at the end of the reporting period.

Consolidated Financial Statements

The financial statements of a subsidiary whose functional currency is the currency of a hyperinflationary economy are restated by applying the general price index before they are included in the consolidated financial statements prepared by the parent company. If the subsidiary is a foreign subsidiary, its restated financial statements are translated at the closing rate. When consolidating financial statements with different reporting period ends, all monetary and non-monetary items are restated in accordance with the measuring unit current at the date of the consolidated financial statements.

Comparative Figures

Relevant figures for the previous reporting period are restated by applying the general price index so that the comparative financial statements are presented in the measuring unit applicable at the end of the reporting period. Information disclosed for prior periods is also expressed in terms of the measuring unit current at the end of the reporting period.

2.2 Functional and Presentation of Currency

The individual financial statements of each Group entity are prepared in the currency of the primary economic environment in which the entity operates (its functional currency). For the purpose of the consolidated financial statements, the results and financial position of each entity are expressed in Turkish Lira ("TL"), which is the functional currency of the Group, and the presentation currency for the consolidated financial statements.

In preparing the financial statements of the individual entities, transactions in foreign currencies (currencies other than TL) are recorded at the rates of exchange prevailing on the dates of the transactions. At each balance sheet date, monetary items denominated in foreign currencies are converted at the rates prevailing on the balance sheet date. Non-monetary items carried at fair value that are denominated in foreign currencies are retranslated at the rates prevailing on the date when the fair value was determined. Non-monetary items that are measured in terms of historical cost in a foreign currency are not retranslated. Gains and losses arising on settlement and translation of foreign currency items are included in the consolidated statement of profit or loss and other comprehensive income.

ENERJISA ENERJİ A.Ş. AND ITS SUBSIDIARIES

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2024

(Amounts expressed in thousands of Turkish Lira ("TL") in terms of purchasing power of the TL at 31 December 2024 unless otherwise indicated. Currencies other than TL are also expressed in thousands unless otherwise indicated.)

NOTE 2 - BASIS OF PRESENTATION OF CONSOLIDATED FINANCIAL STATEMENTS (Continued)

2.3 Comparative Information and Reclassification of Prior Period Consolidated Financial Statements

In order to allow for the determination of the financial situation and performance trends, the Group's consolidated financial statements have been presented comparatively with the prior period.

If the presentation or classification of the current period financial statements is changed, in order to maintain consistency, comparative information is also adjusted or reclassified in line with the related changes.

The Group does not have any material reclassifications and adjustments in the consolidated financial statements as at 31 December 2024.

2.4 Changes in Accounting Policies

The significant changes that were made on accounting policies applied retrospectively and the financial statements of preceding period are restated. No changes have been applied to the accounting policies of the Group in the current period.

2.5 Changes and Misstatements in Accounting Estimates

If changes in accounting estimates are related to only one period, the changes are applied prospectively in the current period in which changes are made. If changes in accounting estimates are related to future periods, the changes are applied prospectively both in the current period in which changes are made and also in future periods. The accounting misstatements which are identified are applied retrospectively and consolidated financial statements of preceding period are restated. No changes have been applied to the accounting estimates of the Group in the current period.

2.6 Going Concern

The Group prepares consolidated financial statements in accordance with the going concern assumption and does not anticipate a significant risk.

The business models of electricity distribution companies operating in Türkiye are to make distribution infrastructure investments and reimburse the investments within 10 years together with a weighted average cost of capital (WACC) regulated by the Energy Market Regulatory Authority (EMRA). Therefore, a short-term financing need is inherent in the business model. The over or under invoicing made by the Group is calculated at the end of each year and adjusted by the EMRA through tariffs after two years. These amounts are classified as long-term receivables in the balance sheet. At the same time, deposits received from customers by retail companies are classified as other short term payables since they are treated as payable on demand. However, the cash outflows of those amounts expected to occur in the long term. As of 31 December 2024, current liabilities exceeds the current assets amounting to TL 16,189,389 in the consolidated financial position of the Group. Group ensures the any possible short term cash need with its strong operational cash inflow and effective financing management.

ENERJISA ENERJİ A.Ş. AND ITS SUBSIDIARIES

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2024

(Amounts expressed in thousands of Turkish Lira ("TL") in terms of purchasing power of the TL at 31 December 2024 unless otherwise indicated. Currencies other than TL are also expressed in thousands unless otherwise indicated.)

NOTE 2 - BASIS OF PRESENTATION OF CONSOLIDATED FINANCIAL STATEMENTS (Continued)

2.7 Basis of Consolidation

The details of the Company's subsidiaries at 31 December 2024 and 31 December 2023 are as follows:

	Place of incorporation and operation	Proportion of ownership interest and voting power held by the Group (%)		Principal activity
		31 December 2024	31 December 2023	
		Başkent Elektrik Dağıtım A.Ş.	Ankara	
Enerjisa Başkent Elektrik Perakende Satış A.Ş.	Ankara	100	100	Electricity Retail Services
İstanbul Anadolu Yakası Elektrik Dağıtım A.Ş.	İstanbul	100	100	Electricity Distribution Services
Enerjisa İstanbul Anadolu Yakası Elektrik Perakende Satış A.Ş.	İstanbul	100	100	Electricity Retail Services
Toroslar Elektrik Dağıtım A.Ş.	Adana	100	100	Electricity Distribution Services
Enerjisa Toroslar Elektrik Perakende Satış A.Ş.	Adana	100	100	Electricity Retail Services
Enerjisa Müşteri Çözümleri A.Ş.	İstanbul	100	100	Renewable Energy and Energy Efficiency Solutions
E-şarj Elektrikli Araçlar Şarj Sistemleri A.Ş.	İstanbul	100	100	Electric Vehicles and Charging Stations Services
Enerjisa Araç Filo Hizmetleri A.Ş.	Ankara	100	-	Operational Car Rental and Fleet Services

The consolidated financial statements incorporate the financial statements of the Company and entities controlled by the Company and its subsidiaries. Control is achieved when the Company:

- Has power over the investee;
- Is exposed, or has rights, to variable returns from its involvement with the investee; and
- Has the ability to use its power to affect its returns.

The Company reassesses whether or not it controls an investee if facts and circumstances indicate that there are changes to one or more of the three elements of control listed above.

When the Company has less than a majority of the voting rights of an investee, it has power over the investee when the voting rights are sufficient to give it the practical ability to direct the relevant activities of the investee unilaterally. The Company considers all relevant facts and circumstances in assessing whether or not the Company's voting rights in an investee are sufficient to give it power, including:

- The size of the Company's holding of voting rights relative to the size and dispersion of holdings of the other vote holders;
- Potential voting rights held by the Company, other vote holders or other parties;
- Rights arising from other contractual arrangements and;
- Any additional facts and circumstances that indicate that the Company has, or does not have, the current ability to direct the relevant activities at the time that decisions need to be made, including voting patterns at previous shareholders' meetings.

Consolidation of a subsidiary begins when the Company obtains control over the subsidiary and ceases when the Company loses control of the subsidiary. Specifically, income and expenses of a subsidiary acquired or disposed of during the year are included in the consolidated statement of profit or loss and other comprehensive income from the date the Company gains control until the date when the Company ceases to control the subsidiary.

ENERJISA ENERJİ A.Ş. AND ITS SUBSIDIARIES

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NOTE 2 - BASIS OF PRESENTATION OF CONSOLIDATED FINANCIAL STATEMENTS (Continued)

2.7 Basis of Consolidation (Continued)

Profit or loss and each component of other comprehensive income are attributed to the owners of the Company and to the non-controlling interests. Total comprehensive income of subsidiaries is attributed to the owners of the Company and to the non-controlling interests even if this results in the non-controlling interests having a deficit balance.

When necessary, adjustments are made to the financial statements of subsidiaries to bring their accounting policies into line with the Group's accounting policies.

All intragroup assets and liabilities, equity, income, expenses and cash flows relating to transactions between members of the Group are eliminated in full on consolidation.

2.8 New and Amended Turkish Financial Reporting Standards

a) Amendments that are mandatorily effective from 2024

Amendments to TAS 1	<i>Classification of Liabilities as Current or Non-Current</i>
Amendments to TFRS 16	<i>Lease Liability in a Sale and Leaseback</i>
Amendments to TAS 1	<i>Non-current Liabilities with Covenants</i>
Amendments to TAS 7 and TFRS 7	<i>Supplier Finance Arrangements</i>
TSRS 1	<i>General Requirements for Disclosure of Sustainability-related Financial Information</i>
TSRS 2	<i>Climate-related Disclosures</i>

Amendments to TAS 1 *Classification of Liabilities as Current or Non-Current*

The amendments aim to promote consistency in applying the requirements by helping companies determine whether, in the statement of financial position, debt and other liabilities with an uncertain settlement date should be classified as current (due or potentially due to be settled within one year) or non-current.

Amendments to TFRS 16 *Lease Liability in a Sale and Leaseback*

Amendments to TFRS 16 clarify how a seller-lessee subsequently measures sale and leaseback transactions that satisfy the requirements in TFRS 15 to be accounted for as a sale.

Amendments to TAS 1 *Non-current Liabilities with Covenants*

Amendments to TAS 1 clarify how conditions with which an entity must comply within twelve months after the reporting period affect the classification of a liability.

Amendments to TAS 7 and TFRS 7 *Supplier Finance Arrangements*

The amendments add disclosure requirements, and 'signposts' within existing disclosure requirements, that ask entities to provide qualitative and quantitative information about supplier finance arrangements.

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NOTE 2 - BASIS OF PRESENTATION OF CONSOLIDATED FINANCIAL STATEMENTS (Continued)

2.8 New and Amended Turkish Financial Reporting Standards (Continued)

a) Amendments that are mandatorily effective from 2024 (continued)

TSRS 1 *General Requirements for Disclosure of Sustainability-related Financial Information*

TSRS 1 sets out overall requirements for sustainability-related financial disclosures with the objective to require an entity to disclose information about its sustainability-related risks and opportunities that is useful to primary users of general purpose financial reports in making decisions relating to providing resources to the entity. The application of this standard is mandatory for annual reporting periods beginning on or after 1 January 2024 for the entities that meet the criteria specified in POA's announcement dated 5 January 2024 and numbered 2024-5 and for banks regardless of the criteria. Other entities may voluntarily report in accordance with TSRS.

TSRS 2 *Climate-related Disclosures*

TSRS 2 sets out the requirements for identifying, measuring and disclosing information about climate-related risks and opportunities that is useful to primary users of general purpose financial reports in making decisions relating to providing resources to the entity. The application of this standard is mandatory for annual reporting periods beginning on or after 1 January 2024 for the entities that meet the criteria specified in POA's announcement dated 5 January 2024 and numbered 2024-5 and for banks regardless of the criteria. Other entities may voluntarily report in accordance with TSRS.

b) New and revised TFRSs in issue but not yet effective

The Group has not yet adopted the following standards and amendments and interpretations to the existing standards:

TFRS 17	<i>Insurance Contracts</i>
Amendments to TFRS 17	<i>Initial Application of TFRS 17 and TFRS 9 — Comparative Information (Amendment to TFRS 17)</i>
Amendments to TAS 21	<i>Lack of Exchangeability</i>

TFRS 17 *Insurance Contracts*

TFRS 17 requires insurance liabilities to be measured at a current fulfillment value and provides a more uniform measurement and presentation approach for all insurance contracts. These requirements are designed to achieve the goal of a consistent, principle-based accounting for insurance contracts. TFRS 17 has been deferred for insurance, reinsurance and pension companies for a further year and will replace TFRS 4 *Insurance Contracts* on 1 January 2025.

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NOTE 2 - BASIS OF PRESENTATION OF CONSOLIDATED FINANCIAL STATEMENTS (Continued)

2.8 New and Amended Turkish Financial Reporting Standards (Continued)

b) New and revised TFRSs in issue but not yet effective (continued)

Amendments to TAS 21 Lack of Exchangeability

The amendments contain guidance to specify when a currency is exchangeable and how to determine the exchange rate when it is not. Amendments are effective from annual reporting periods beginning on or after 1 January 2025.

The Group evaluates the effects of these standards, amendments and improvements on the consolidated financial statements.

2.9 Summary of Significant Accounting Policies

Business combinations

The acquisition of subsidiaries and businesses are accounted for using the acquisition method. The consideration transferred in a business combination is measured at fair value, which is calculated as the sum of the acquisition-date fair values of the assets transferred by the Group, liabilities incurred by the Group to the former owners of the acquiree and the equity interests issued by the Group in exchange for control of the acquiree. Acquisition-related costs are generally recognized in profit or loss as incurred.

At the acquisition date, the identifiable assets acquired and the liabilities assumed are recognized at their fair value.

Goodwill is measured as the excess of the sum of the consideration transferred, the amount of any non-controlling interests in the acquiree, and the fair value of the acquirer's previously held equity interest in the acquiree (if any) over the net of the acquisition-date amounts of the identifiable assets acquired and the liabilities assumed. If, after reassessment, the net of the acquisition-date amounts of the identifiable assets acquired and liabilities assumed exceeds the sum of the consideration transferred, the amount of any non-controlling interests in the acquiree and the fair value of the acquirer's previously held interest in the acquiree (if any), the excess is recognized immediately in profit or loss as a bargain purchase gain.

When the consideration transferred by the Group in a business combination includes assets or liabilities resulting from a contingent consideration arrangement, the contingent consideration is measured at its acquisition-date fair value and included as part of the consideration transferred in a business combination. Changes in the fair value of the contingent consideration that qualify as measurement period adjustments are adjusted retrospectively, with corresponding adjustments against goodwill. Measurement period adjustments are adjustments that arise from additional information obtained during the 'measurement period' (which cannot exceed one year from the acquisition date) about facts and circumstances that existed at the acquisition date.

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NOTE 2 - BASIS OF PRESENTATION OF CONSOLIDATED FINANCIAL STATEMENTS (Continued)

2.9 Summary of Significant Accounting Policies (Continued)

Business combinations (continued)

The subsequent accounting for changes in the fair value of the contingent consideration that do not qualify as measurement period adjustments depends on how the contingent consideration is classified. Contingent consideration that is classified as equity is not re-measured at subsequent reporting dates and its subsequent settlement is accounted for within equity. When the contingent consideration classified as asset or liability is in the nature of financial instruments and within the context of TFRS 9 *Financial Instruments*, it is re-measured at fair value and; gain or loss due to changes are recognized in profit or loss or other comprehensive income. Those are not within the context of TFRS 9 are re-measured in accordance with TAS 37 *Provisions, Contingent Liabilities and Contingent Assets*.

Goodwill

Goodwill arising on an acquisition of a business is carried at indexed cost as established at the date of acquisition of the business less accumulated impairment losses, if any.

For the purposes of impairment testing, goodwill is allocated to each of the Group's cash-generating units (or groups of cash-generating units) that is expected to benefit from the synergies of the combination.

A cash-generating unit to which goodwill has been allocated is tested for impairment annually (Note: 2.10), or more frequently when there is indication that the unit may be impaired. If the recoverable amount of the cash-generating unit is less than its carrying amount, the impairment loss is allocated first to reduce the carrying amount of any goodwill allocated to the unit and then to the other assets of the unit pro rata based on the carrying amount of each asset in the unit. Any impairment loss for goodwill is recognized directly in profit or loss in the consolidated statement of comprehensive income. An impairment loss recognized for goodwill is not reversed in subsequent periods.

On disposal of the relevant cash-generating unit, the attributable amount of goodwill is included in the determination of the profit or loss on disposal.

Related parties

A related party is a person or entity that is related to the entity that is preparing its financial statements

- a) A person or a close member of that person's family is related to a reporting entity if that person:
 - i. has control or joint control over the reporting entity;
 - ii. has significant influence over the reporting entity; or
 - iii. is a member of the key management personnel of the reporting entity or of a parent of the reporting entity.

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NOTE 2 - BASIS OF PRESENTATION OF CONSOLIDATED FINANCIAL STATEMENTS (Continued)

2.9 Summary of Significant Accounting Policies (Continued)

Related parties (continued)

- (b) An entity is related to a reporting entity if any of the following conditions applies:
- The entity and the reporting entity are members of the same group (which means that each parent, subsidiary and fellow subsidiary is related to the others).
 - One entity is an associate or joint venture of the other entity (or an associate or joint venture of a member of a group of which the other entity is a member).
 - Both entities are joint ventures of the same third party.
 - One entity is a joint venture of a third entity and the other entity is an associate of the third entity.
 - The entity is a post-employment benefit plan for the benefit of employees of either the reporting entity or an entity related to the reporting entity. If the reporting entity is itself such a plan, the sponsoring employers are also related to the reporting entity.
 - The entity is controlled or jointly controlled by a person identified in (a).
 - A person identified in (a) (i) has significant influence over the entity or is a member of the key management personnel of the entity (or of a parent of the entity).

A related party transaction is a transfer of resources, services or obligations between a reporting entity and a related party, regardless of whether a price is charged.

Revenue recognition

Distribution part of the revenue is composed of distribution, meter reading services, transmission and theft and loss components. Distribution and meter reading service components are considered within the content of service concession arrangements due to the regulations of EMRA. Additionally, according to the Electricity Market Law, the Electricity Market Tariffs Communiqué and other related regulations, the Group's distribution, transmission and meter reading services are subject to revenue caps which cover operating expenses and investment requirements related to distribution and meter reading services. Moreover, transmission revenue is a complete pass-through of transmission costs as charged by Türkiye Elektrik İletim A.Ş. ("TEİAŞ"). These regulations guarantee revenue to the Group during the transition period regardless of the consumption level. The under billings or overbillings made by the Group are adjusted by EMRA in the tariffs to be effective in two years.

Revenue recognition principles other than the assets classified as due from service concession arrangements under TFRIC 12 are as follows:

Revenue (excluding the distribution business) is recognized upon delivery of electricity to customers or upon fulfilment of services. Delivery is deemed complete when the risk and rewards associated with ownership has been transferred to the buyer as contractually agreed, compensation has been contractually established and collection of the resulting receivable is probable.

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NOTE 2 - BASIS OF PRESENTATION OF CONSOLIDATED FINANCIAL STATEMENTS (Continued)

2.9 Summary of Significant Accounting Policies (Continued)

Revenue recognition (continued)

Gross profit to be gained from the regulatory portfolio of the Group is determined by EMRA and the revenue of the companies related to the regulated portfolio is computed in accordance with the provisions of "Regulation of Retail Energy Sales Prices" issued by EMRA on 17 November 2020 by considering revenue requirements to cover the operational expenses and the doubtful receivable expenses are reflected in the consolidated financial statements with the requirement of TFRS 15.

Revenue from the sale and delivery of electricity is measured at the fair value of the consideration received or receivable. The estimated value of the electricity supplied but not invoiced to the customers is considered for the measurement of revenue.

Revenue is recognized on an accrual basis at the time the electricity is distributed, at the invoiced values. Net sales represent the invoiced value of electricity distributed excluding sales commission and sales taxes.

The Group's Customer Solutions company provides decentralized generation, renewable energy solutions and energy efficiency services to customers. These services are considered as performance obligations spread over time. Revenue related to these services is recognized in accordance with TFRS 15 depending on the stage of completion of the contract.

Principal and agent assessment

When another party is involved in providing goods or services to a customer, the Group determines whether the nature of its promise is a performance obligation to provide the specified goods or services itself or to arrange for the other party to provide those goods or services. The Group is a principal if it controls a promised good or service before the Group transfers the good or service to a customer. When a Group that is a principal satisfies a performance obligation, it recognizes as revenue the gross amount of consideration which it expects to be entitled to in exchange for those goods or services. The Group is an agent if its performance obligation is to arrange for the provision of goods or services by another party and in such a position, the Group does not recognize the revenue of the consideration at gross amount.

Financial income from service concession arrangements

Financial income is accrued on a time basis, by reference to the principal outstanding and at the effective interest rate applicable, which is the rate that exactly discounts estimated future cash receipts through the expected life of the financial asset to that asset's net carrying amount.

Financial income related to service concession arrangements is recognized in accordance with Service Concession Arrangements ("TFRIC 12"). Financial income from service concession arrangement is recognized on a time-proportion basis using the effective interest method.

Group recognizes the revenue calculated by the internal rate of return as "Financial Income from Service Concession Arrangements" in profit or loss and other comprehensive income statement. Main revenue source of distribution companies are financial income from the investments for improvement and maintenance of network. Therefore, Group evaluates that the financial income from service concession arrangements drives from the main business activity of the distribution companies and accordingly it is recognized as a part of revenue.

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NOTE 2 - BASIS OF PRESENTATION OF CONSOLIDATED FINANCIAL STATEMENTS (Continued)

2.9 Summary of Significant Accounting Policies (Continued)

Service concession arrangements

Service concession arrangements are defined within scope of TFRIC 12 as those whereby a government or other body grants contracts for the supply of public services – operations such as roads, energy distribution, prisons or hospitals – to private operators. The Group's electricity distribution and meter reading service businesses are in the scope of service concession agreements.

Considering the Group's terms in the service concession arrangements, a financial asset model where the Group recognizes TFRIC 12 as a financial asset to the extent that it has an unconditional contractual right to receive cash or another financial asset from or at the direction of the grantor has been applied, since the right to receive cash for the distribution and meter reading services are constituted through actual billing to subscribers where the distribution and meter reading service components of the billing are already specified or determinable through the regulated by EMRA.

The Group recognizes the revenue on an effective interest method as "Financial Income from Service Concession Arrangements" in profit or loss and other comprehensive income and "Financial Assets from Service Concession Arrangements" on the consolidated statement of financial position.

Inventories

Inventories mainly include electricity equipment and materials related to the Group's electricity distribution business. Inventories are stated at the lower of indexed cost or net realizable value. The cost of inventories is determined on a weighted average basis. Additional costs, incurred to bring the inventories to the intended usable condition or position, are included in determination of cost.

Property, plant and equipment

Property, plant and equipment are carried at indexed cost less indexed accumulated depreciation and any accumulated impairment losses.

Properties in the course of construction for production, supply or administrative purposes, or for purposes not yet determined, are carried at cost, less any recognized impairment loss. Cost includes professional fees such properties are classified to the appropriate categories of property, plant and equipment when completed and ready for intended use. Depreciation of these assets, on the same basis as other property assets, commences when the assets are ready for their intended use.

Depreciation is recognized so as to write off the indexed cost or valuation of assets, other than freehold land and properties under construction, less their residual values over their estimated useful lives, using the straight-line method. The estimated useful lives, residual values and depreciation method are reviewed at the end of each reporting period, with the effect of any changes in estimate accounted for on a prospective basis.

Assets held under finance leases are depreciated over their expected useful lives on the same basis as owned assets. However, when there is no reasonable certainty that ownership will be obtained by the end of the lease term, assets are depreciated over the shorter of the lease term and their useful lives.

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NOTE 2 - BASIS OF PRESENTATION OF CONSOLIDATED FINANCIAL STATEMENTS (Continued)

2.9 Summary of Significant Accounting Policies (Continued)

Property, plant and equipment (continued)

An item of property, plant and equipment is derecognized from statement of financial position (balance sheet) upon disposal or when no future economic benefits are expected to arise from the continued use of the asset. Any gain or loss arising on the disposal or retirement of an item of property, plant and equipment is determined as the difference between the sales proceeds and the carrying amount of the asset and is recognized in profit or loss.

Intangible assets

Customer contracts and relations and transfer of operational rights

Customer contracts and relations and TOR are reported at indexed cost less accumulated amortization and accumulated impairment losses. Amortization is charged on a straight-line basis over their estimated useful lives. The useful lives of customer contracts and relations range between 25-30 years.

Computer software

Acquired computer software licenses are capitalized on the basis of the indexed costs incurred to acquire and bring to use the specific software. These indexed costs are amortized over their estimated useful lives (3-5 years).

Leasing transactions

Group as a lessee

Initially the Group assesses whether the contract is, or contains lease. A contract is, or contains, a lease if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration.

To assess whether a contract conveys the right to control the use of an identified asset for a period of time, the Group shall assess whether, throughout the period of use, the customer has both of the following:

- The contract includes an identified asset (identification of an asset in a clear or implicitly specified form in the contract),
- A capacity portion of an asset is an identified asset if it is physically distinct and represents substantially all of the capacity of the asset (the asset is not an identified asset if the vendor has a fundamental right to substitute the asset for the duration of its use and obtain an economic benefit from it),
- The Group has the right to obtain almost all of the economic benefits that will be derived from the use of the identified asset,
- The right to direct the use of the identified asset. The Group has the right to direct the use of an identified asset throughout the period of use only if either:

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NOTE 2 - BASIS OF PRESENTATION OF CONSOLIDATED FINANCIAL STATEMENTS (Continued)

2.9 Summary of Significant Accounting Policies (Continued)

Leasing transactions (continued)

- a) the Group has the right to direct how and for what purpose the asset is used throughout the period of use
- b) the Group has the right to direct use of asset if either:
 - i. the Group has the right to operate (or to have the right to direct others to operate) the asset over its useful life and the lessor does not have the rights to change the terms to operate or;
 - ii. the Group designed the asset (or the specific features) in a way that predetermines how and for what purpose it is used

The Group recognizes right of use asset and lease liability at the start date of lease after evaluation of aforementioned criterias.

Right of use asset

The Group recognises right-of-use assets at the commencement date of the lease (i.e., the date the underlying asset is available for use). Right-of-use assets are measured at indexed cost, less any indexed accumulated depreciation and impairment losses, and adjusted for any remeasurement of lease liabilities.

The cost of right-of-use assets includes:

- a. The amount of lease liabilities recognized,
- b. Lease payments made at or before the commencement date less any lease incentives received, and
- c. Initial direct costs incurred by the Group.

Unless the Group is reasonably certain to obtain ownership of the leased asset at the end of the lease term, the recognised right-of-use assets are depreciated on a straight-line basis over the shorter of its estimated useful life and the lease term.

Right-of-use assets are subject to impairment.

Lease liabilities

The Group measures its rent obligation at the present value of unpaid lease payments on the date that the lease commences.

Lease payments included in the measurement of the lease obligation on the date that the lease actually commences consists of the following payments to be made for the right of use of the underlying asset during the lease period and not paid on the actual lease date:

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NOTE 2 - BASIS OF PRESENTATION OF CONSOLIDATED FINANCIAL STATEMENTS (Continued)

2.9 Summary of Significant Accounting Policies (Continued)

Leasing transactions (continued)

Lease Liabilities (continued)

- a. Fixed payments,
- b. Variable lease payments based on an index or rate, the first measurement made using an index or rate on the actual date of the lease,
- c. Amounts expected to be paid by the Group under residual value commitments,
- d. The use price of this option if the Group is reasonably certain that it will use it, and
- e. The penalty payments for termination of the lease if the lease shows that the Group will use an option to terminate the lease.

Variable lease payments that do not depend on an index or rate are recognized as an expense in the period in which the event or condition that triggered the payment occurred.

After the effective date of the lease, the Group measures the lease obligation as follows:

- a. Increase the carrying amount to reflect the interest on the lease obligation; and
- b. Decreases the carrying amount to reflect the lease payments made.

In addition, in the event of a change in the lease term, in essence a change in fixed lease payments or a change in the assessment of the option to buy the underlying asset, the value of the lease obligations is remeasured.

Impairment of non-financial assets

Assets that have an indefinite useful life, for example goodwill, are not subject to amortization and are tested annually for impairment. Assets that are subject to amortization are reviewed for impairment whenever events or changes in circumstances indicate that the carrying amount may not be recoverable. An impairment loss is recognized for the amount by which the asset's carrying amount exceeds its recoverable amount. The recoverable amount is the higher of an asset's fair value less costs to sell and value in use. For the purposes of assessing impairment, assets are grouped at the lowest levels for which there are separately identifiable cash flows (cash-generating units). Non-financial assets other than goodwill that suffered impairment are reviewed for possible reversal of the impairment at each reporting date.

Borrowing cost

Borrowing costs directly attributable to the acquisition, construction or production of qualifying assets, which are assets that necessarily take a substantial period of time to get ready for their intended use or sale, are added to the cost of those assets, until such time as the assets are substantially ready for their intended use or sale. Investment income earned on the temporary investment of specific borrowings pending their expenditure on qualifying assets is deducted from the borrowing costs eligible for capitalization. There were no capitalized borrowing costs in 2023 and 2024.

All other borrowing costs are recognized in statement of profit or loss and other comprehensive income in the period in which they are incurred.

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NOTE 2 - BASIS OF PRESENTATION OF CONSOLIDATED FINANCIAL STATEMENTS (Continued)

2.9 Summary of Significant Accounting Policies (Continued)

Financial instruments

Financial assets - Classification and measurement

The Group classified its financial assets in three categories as financial assets carried at amortized cost, financial assets carried at fair value through profit or loss, financial assets carried at fair value through other comprehensive income. Classification is performed in accordance with the business model determined based on the purpose of benefits from financial assets and expected cash flows. Management performs the classification of financial assets at the acquisition date.

(a) Financial assets carried at amortised cost

Assets that are held for collection of contractual cash flows where those cash flows represent solely payments of principal and interest, whose payments are fixed or predetermined, which are not actively traded and which are not derivative instruments are measured at amortized cost. They are included in current assets, except for maturities more than 12 months after the balance sheet date. Those with maturities more than 12 months are classified as non-current assets. The Group's financial assets carried at amortized cost comprise "trade receivables", "other receivables", "financial assets" (TFRIC 12), "cash and cash equivalents" and "financial investments to be held to maturity" in the statement of financial position.

Impairment

The Group has applied simplified approach and used impairment matrix for the calculation of impairment for its receivables on its consolidated financial statements, since they do not comprise of any significant finance component. In accordance with this method, if any provision provided to the trade receivables as a result of a specific events, the Group measures expected credit loss from these receivables by the life-time expected credit loss. The calculation of expected credit loss is performed based on the experience of the Group and its expectation based on the macroeconomic indications.

In the retail business, part of the doubtful trade receivables expenses are compensated by EMRA through retail service revenue. The compensation amount calculated by multiplying the average of company risk and country risk with the net invoiced sales revenue of the retail company and the amount is included in the uncontrollable operating expenses.

In the distribution business, distribution companies receive reimbursements for overdue receivables from EMRA two years after the date when doubtful receivable has become due, provided that a legal action has been initiated against the counter-party with respect to receivables. Therefore, uncollected receivables are returned to distribution companies after a two-year period.

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NOTE 2 - BASIS OF PRESENTATION OF CONSOLIDATED FINANCIAL STATEMENTS (Continued)

2.9 Summary of Significant Accounting Policies (Continued)

Financial instruments (continued)

Financial assets - Classification and measurement (continued)

(b) Financial assets carried at fair value

Assets that are held by the management for collection of contractual cash flows and for selling the financial assets are measured at their fair value. If the management do not plan to dispose these assets in 12 months after the balance sheet date, they are classified as non-current assets. The Group make a choice for the equity instruments during the initial recognition and elect profit or loss or other comprehensive income for the presentation of fair value gain and loss:

i) *Financial assets carried at fair value through profit or loss*

Financial assets carried at fair value through profit or loss comprise of "derivative instruments" in the statement of financial position. Derivative instruments are recognized as asset when the fair value of the instrument is positive, as liability when the fair value of the instrument is negative. The Group's financial instruments at fair value through profit or loss consist of forward exchange contracts.

ii) *Financial assets carried at fair value through other comprehensive income*

Financial assets carried at fair value through other comprehensive income comprise of "derivative instruments" in the statement of financial position. Gains or losses on a financial asset carried at fair value through other comprehensive income is recognized in other comprehensive income under the scope of hedge accounting. The Group's financial instruments at fair value through other comprehensive income consist of forward exchange contracts to mitigate the foreign exchange rate risk arising from foreign currency costs, which are part of energy procurement costs, within the scope of feed-in-tariff ("FIT") mechanism, foreign currency denominated energy purchases and investments.

Offsetting

Financial assets and liabilities are offset and the net amount reported in the consolidated balance sheet when there is a legally enforceable right to set off the recognized amounts and there is an intention to settle on a net basis, or realize the asset and settle the liability simultaneously.

Provisions, contingent liabilities, contingent assets

Provisions are recognized when the Group has a present obligation as a result of a past event, and it is probable that the Group will be required to settle that obligation, and a reliable estimate can be made of the amount of the obligation.

When some or all of the economic benefits required to settle a provision are expected to be recovered from a third party, the receivable is recognized as an asset if it is virtually certain that reimbursement will be received and the amount of the receivable can be measured reliably.

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NOTE 2 - BASIS OF PRESENTATION OF CONSOLIDATED FINANCIAL STATEMENTS (Continued)

2.9 Summary of Significant Accounting Policies (Continued)

Provisions, contingent liabilities, contingent assets (continued)

Contingent liabilities are assessed continuously to determine probability of outflow of economically beneficial assets. For contingent liabilities, when an outflow of resources embodying economic benefits are probable, provision is recognized for this contingent liability in the period when the probability has changed, except for cases where a reliable estimate cannot be made.

Possible assets that arise from past events and whose existence not wholly within the control of the Group and that will be confirmed only by the occurrence or non-occurrence of one or more uncertain future events are recognized as contingent assets. When an inflow of resources embodying economic benefits is probable, the Group discloses contingent assets in the notes.

When the outflow of economic benefits from the Group is probable but the amount cannot be measured reliably, the Group discloses this fact in the notes.

Earnings per share

Earnings per share disclosed in the consolidated statement of profit or loss and other comprehensive income are determined by dividing net earnings by the weighted average number of shares that have been outstanding during the related period.

In Türkiye, companies can increase their share capital by making a pro-rata distribution of shares ("bonus shares") to existing shareholders from retained earnings on equity items. Such kind of bonus shares are taken into consideration in the computation of earnings per share as issued share certificates. For the purpose of earnings per share computations, the weighted average number of shares outstanding during the period has been adjusted in respect of bonus shares issues without a corresponding change in resources, by giving them retroactive effect for the year in which they were issued and each earlier year.

Segment reporting

The Group has electricity distribution, retail and customer solutions operating segments, which includes the information used from management to evaluate performance and taking decision for resource allocation. These segments are managed separately because it is influenced by different economic situations and business positions in terms of risk and return.

Operating segments are reported in a manner consistent with the reporting provided to the board of directors. Board of directors are responsible for the decisions related to the allocation of resources to the segments and assessment of performance of segments.

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NOTE 2 - BASIS OF PRESENTATION OF CONSOLIDATED FINANCIAL STATEMENTS (Continued)

2.9 Summary of Significant Accounting Policies (Continued)

Government grants

Electricity distribution companies within the Group have the right to benefit from VAT exemption for machinery equipment purchases from domestic suppliers in the scope of renewal of existing investments with the investment incentive certificate which had been obtained from the Ministry of Economy on 15 January 2016.

Taxation and deferred income taxes

Turkish Tax Legislation does not permit a parent company and its subsidiary to file a consolidated tax return. Therefore, provisions for taxes, as reflected in the accompanying consolidated financial statements, have been calculated on a separate-entity basis.

Income tax expense represents the sum of current tax and deferred tax expenses.

Current tax expense

The tax currently payable is based on taxable profit for the year. Taxable profit differs from profit as reported in the comprehensive income statement because it excludes items of income or expense that are taxable or deductible in other years and it further excludes items that are never taxable or deductible. The Group's liability for current tax is calculated using tax rates that have been enacted by the balance sheet date.

Deferred tax

Deferred tax is recognized in accordance with the balance sheet method on temporary differences between the carrying amounts of assets and liabilities in the financial statements and the corresponding tax bases which is used in the computation of taxable profit with using tax rates that have been enacted or substantively enacted in accordance with the balance sheet method.

Deferred tax liabilities are generally recognized for all taxable temporary differences and deferred tax assets are recognized to the extent that it is probable that taxable profits will be available against which deductible temporary differences can be utilized. Such deferred tax assets and liabilities are not recognized if the temporary difference arises from goodwill or from the initial recognition (other than in a business combination) of other assets and liabilities in a transaction that affects neither the taxable profit nor the accounting profit.

The carrying amount of deferred tax assets is reviewed at each balance sheet date and reduced to the extent that it is no longer probable that sufficient taxable profits will be available to allow all or part of the asset to be recovered.

Deferred tax assets and liabilities are measured at the tax rates that are expected to apply in the period in which the liability is settled or the asset realized, based on tax rates (and tax laws) that have been enacted or substantively enacted by the balance sheet date. The measurement of deferred tax liabilities and assets reflects the tax consequences that would follow from the manner in which the Group expects, at the reporting date, to recover or settle the carrying amount of its assets and liabilities.

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NOTE 2 - BASIS OF PRESENTATION OF CONSOLIDATED FINANCIAL STATEMENTS (Continued)

2.9 Summary of Significant Accounting Policies (Continued)

Taxation and deferred income taxes (continued)

Deferred tax (continued)

Deferred tax assets and liabilities are offset when there is a legally enforceable right to set off current tax assets against current tax liabilities and when they relate to income taxes levied by the same taxation authority and the Group intends to settle its current tax assets and liabilities on a net basis.

Current and deferred taxes are recognized as in profit or loss, except when they relate to items that are recognized in other comprehensive income or directly in equity.

Subsequent events

Subsequent events; even if they occur after any announcement related with profit or public announcement of other chosen financial information, covers any event between the balance sheet date and the publication date of the balance sheet.

In the case that events requiring an adjustment to the financial statements occur subsequent to the date of statement of financial position, the Group makes the necessary corrections on the consolidated financial statements.

Employment benefits

Termination and retirement benefits

Under Turkish law and union agreements, lump sum payments are made to employees retiring or involuntarily leaving the Group. Such payments are considered as being part of defined retirement benefit plan as per TAS 19 (revised) "Employee Benefits" ("TAS 19").

The retirement benefit obligation recognized in the statement of the financial position represents the present value of the defined benefit obligation. Actuarial gains and losses have no material impact in the consolidated financial statements and are recognized in the statement of profit or loss and other comprehensive income.

Vacation rights and bonus provisions

The liabilities related to unused vacation rights and bonus payments from current year's performance are accrued when they are entitled.

Defined contribution plans

The Group pays contributions to the Social Security Institution of Türkiye on a mandatory basis. The Group has no further payment obligations once the contributions have been paid. The contributions are recognized as employee benefit expense when they are due.

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NOTE 2 - BASIS OF PRESENTATION OF CONSOLIDATED FINANCIAL STATEMENTS (Continued)

2.9 Summary of Significant Accounting Policies (Continued)

Statement of cash flow

In statement of cash flows, cash flows are classified according to operating, investing and financing activities.

Cash flows from operating activities represent the cash flows generated from the Group's activities.

Cash flows related to investing activities represent the cash flows that are used in or provided from the investing activities of the Group (tangible and intangible assets, investments related to service concession arrangements and financial investments).

The disclosure of cash flows from investing activities provides users with information on the extent of expenditure that has been incurred in order to generate the future cash flows and profits of the business. Group is responsible to provide electricity distribution services and operate the electricity network during the license period. In order to maintain the network service, the Group has to make these physical investments and incur related expenditure to generate future cash flows. Therefore, capital expenditures related to service concession arrangement has been classified under cash flows from investing activities at consolidated statement of cash flow.

Cash flows arising from financing activities represent the cash proceeds from the financing activities of the Group and the repayments of these funds.

Share capital and dividends

Common shares are classified as equity.

Dividends on common shares are recognized in equity in the period in which they are approved and declared. Dividend income from investments is recognized when the shareholder's right to receive payment has been established (provided that it is probable that the economic benefits will flow to the Group and the amount of income can be measured reliably).

2.10 Significant Accounting Estimates and Assumptions

Critical Accounting Judgments and Key Sources of Estimation Uncertainty

Critical judgments in applying the Group's accounting policies

Use of Estimates

The preparation of consolidated financial statements in conformity with TAS requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the consolidated financial statements and the reported amounts of revenue and expenses during the period. Actual results could differ from those estimates.

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NOTE 2 - BASIS OF PRESENTATION OF CONSOLIDATED FINANCIAL STATEMENTS
(Continued)

2.10 Significant Accounting Estimates and Assumptions (Continued)

Critical Accounting Judgments and Key Sources of Estimation Uncertainty (Continued)

Critical judgments in applying the Group's accounting policies (continued)*Impairment test of Goodwill*

Pursuant to TAS 36 *Impairment of Assets*, the Group tested goodwill as of 31 December 2024 in accordance with the accounting policy stated at Note: 2.9. The goodwill impairment test is carried out for Retail ("CGU"). As of 31 December 2024, the following assumptions were used to determine the recoverable amount of Retail CGU:

<u>CGU:</u>	<u>Retail</u>			2028 and after
Base used for the recoverable amount:	Value in use			
Source:	Forecasted cash flows			
	2025	2026	2027	
WACC (TL):	35.9%	24.8%	19.1%	16.5%
Terminal growth rate:	4.4%			

The net present value of Retail CGU was calculated by discounting the TL, which is the functional currency of the Group, free cash flows. The Group compared the recoverable amount calculated based on the aforementioned assumptions to the total value of Retail CGU and no impairment was identified.

1% increase of weighted average cost of capital decreases the recoverable amount of Retail CGU by 6%,
1% decrease of weighted average cost of capital increases the recoverable amount of Retail CGU by 8%.
1% increase of terminal growth rate cost of capital increases the recoverable amount of Retail CGU by 5%,
1% decrease of terminal growth rate decreases the recoverable amount of Retail CGU by 9%. No impairment is identified based on the sensitivity analysis.

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NOTE 2 - BASIS OF PRESENTATION OF CONSOLIDATED FINANCIAL STATEMENTS
(Continued)

2.11 Significant Accounting Estimates and Assumptions (Continued)

Critical Accounting Judgments and Key Sources of Estimation Uncertainty (Continued)

Key sources of estimation uncertainty

The key assumptions concerning the future, and other key sources of estimation uncertainty at the consolidated balance sheet date, that have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next financial year, is discussed below:

Service concession arrangements

The Group determines the financial assets and financial income from service concession arrangements balances recognized under service concession arrangements based on the cash flows derived from the tariffs announced by EMRA. The distribution revenue requirements of the Group during the second (2011 - 2015), third (2016 - 2020) and fourth tariff periods (2021 - 2025) were determined by EMRA considering the projected expenses and related tariffs which were published in 2010, 2015 and 2020. These tariffs are revised yearly due to inflation. In determination of the aforementioned projected cash inflows in the upcoming periods the Group management made estimates related to the CPI rate and the WACC ("Weighted Average Capital Cost") rate determined in the latest tariff period continued to be used until the end of the license period.

Revenue recognition

Invoices of the subscribers other than residential and commercial groups are issued monthly at the end of each month by the Group whereas the invoices of the residential subscribers are issued continuously during each month due to the high number of subscribers in this group. Commercial group subscribers are also issued continuously during the month due to the high number of customers in this group although the subscribers with high consumption level are billed at the end of the month. As a result, the total electricity supplied to the residential and commercial subscribers during each month cannot be invoiced and income accruals are recognized as revenue at period-ends for these customer groups based on the actual billing performance.

Deferred tax

Deferred tax assets are recognized to the extent that it is probable that taxable profits will be available against which deductible temporary differences can be utilized in the upcoming years. Deferred tax assets are recognized for unused tax losses and deductible temporary differences to the extent that it is possible that future taxable profits will be available against which they can be used. Group calculated deferred tax assets for the unused tax losses which are carried in the legal books to the extent that it is possible that future taxable profits will be available against which they can be used and for the temporary differences created by adjustments made to inflation accounting in accordance with the Communiqué No. 32415 (2nd. Repetition) dated 30 December 2023 of the Tax Procedure Law. Deferred tax assets are recognized when it is probable that tax benefits will be available in future periods. Therefore, the recognition of the deferred tax assets are based on the expectations of the future financial performance of the Group. Assessments are performed based on the future financial plans and tax planning strategies which can be implemented when necessary. The carrying amount of deferred tax assets is reviewed at each balance sheet date and reduced to the extent that it is no longer probable that sufficient taxable profits will be available to allow all or part of the asset to be recovered (Note 25).

ENERJISA ENERJİ A.Ş. AND ITS SUBSIDIARIES

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NOTE 3 – SHARES IN OTHER PARTIES

Subsidiaries

Name of Subsidiary	Principal activity	Place of incorporation and operation	Proportion of ownership (%)	
			31 December 2024	31 December 2023
BAŞKENT EDAŞ	Electricity Distribution Services	Ankara	100	100
EPS	Electricity Retail Services	Ankara	100	100
AYEDAŞ	Electricity Distribution Services	İstanbul	100	100
AYESAŞ	Electricity Retail Services	İstanbul	100	100
TOROSLAR EDAŞ	Electricity Distribution Services	Adana	100	100
TOROSLAR EPSAŞ	Electricity Retail Services	Adana	100	100
Enerjisa Müşteri Çözümleri A.Ş.	Renewable Energy and Energy Efficiency Solutions	İstanbul	100	100
E-şarj	Electric Vehicles and Charging Stations Services	İstanbul	100	100
Enerjisa Araç Filo Hizmetleri A.Ş.	Operational Car Rental and Fleet Services	Ankara	100	-

Principal Activity	Place of incorporation and operation	Number of subsidiaries owned by the Group	
		31 December 2024	31 December 2023
Electricity Distribution Services	Ankara, İstanbul, Adana	3	3
Electricity Retail Services	Ankara, İstanbul, Adana	3	3
Customer Solutions and Distributed Generation Services	İstanbul	1	1
Electric Vehicles and Charging Stations Services	İstanbul	1	1
Operational Car Rental and Fleet Services	Ankara	1	-

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NOTE 4 - SEGMENT REPORTING

The business activities of the Group are managed and organized according to the services provided in the electricity market. The Group has three main operating segments: electricity distribution, retail and customer solutions. The principal activity of distribution segment is the transmission of electricity over lines to the end users through distribution networks, by also providing infrastructure investments due to the regulated tariffs announced by EMRA; whereas the retail segment conduct retail sales of electricity to the customers. The main activity of the customer solutions segment is to provide renewable energy and energy efficiency solutions to customers. E-şarj Elektrikli Araçlar Şarj Sistemleri A.Ş.'s activities are also disclosed under customer solutions segment. The Group performs segment reporting according to TFRS 8 in order to provide unbiased and transparent information to the investor. The Group management follows the performance of the business segments with operating profit and net profit for the period, as well as financial and non-financial indicators.

The following table contains information on the Group's sales and profit from its operations for the years ended 31 December 2024 and 31 December 2023.

1 January - 31 December 2024	Distribution	Retail	Customer Solutions	Unallocated (*)	Eliminations	Total
Revenue	80,015,373	101,873,171	8,656,907	571,094	(531,766)	190,584,779
Cost of sales (-)	(49,768,857)	(95,172,232)	(2,864,836)	(54,455)	-	(147,860,380)
Gross profit / (loss)	30,246,516	6,700,939	5,792,071	516,639	(531,766)	42,724,399
General administrative expenses (-)	(8,879,848)	(3,935,210)	(551,940)	(3,399,692)	547,644	(16,219,046)
Other income / (expense) from operating activities - net	1,255,387	2,258,796	(2,378,335)	(26,717)	(15,878)	1,093,253
Operating profit / (loss)	22,622,055	5,024,525	2,861,796	(2,909,770)	-	27,598,606
Financial income	250,542	6,361,684	47,779	8,634,777	(12,459,551)	2,835,231
Financial expense (-)	(19,796,696)	(2,201,713)	(2,812,262)	(10,745,944)	12,459,551	(23,097,064)
Monetary gains / (losses)	(3,267,074)	(3,994,560)	191,948	2,475,750	-	(4,593,936)
Profit / (loss) before taxation on income	(191,173)	5,189,936	289,261	(2,545,187)	-	2,742,837
Current tax expense (-)	-	(2,046,432)	54,401	-	-	(1,992,031)
Deferred tax income / (expense)	(5,752,428)	42,906	(163,985)	269,918	-	(5,603,589)
Net profit / (loss) for the period	(5,943,601)	3,186,410	179,677	(2,275,269)	-	(4,852,783)

(*) TL 2,577,762 of TL 4,746,512 depreciation and amortization expenses represents amortization expenses of intangible assets (Note 13), which is presented as unallocated under general administrative expenses. The majority of financial expenses under unallocated part mainly represent costs of loans utilized for the acquisitions of distribution and retail business and financial incomes under unallocated part mainly represents the interest income from intercompany loans given to distribution and retail business. The Group management follows the performances of the operating segments excluding acquisitions related loans, therefore the amounts have not been distributed to the segments.

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NOTE 4 - SEGMENT REPORTING (Continued)

1 January - 31 December 2023	Distribution	Retail	Customer Solutions	Unallocated (*)	Eliminations	Total
Revenue	92,999,045	148,157,561	2,359,407	541,628	(541,707)	243,515,934
Cost of sales (-)	(65,382,405)	(140,262,668)	(975,618)	-	-	(206,620,691)
Gross profit / (loss)	27,616,640	7,894,893	1,383,789	541,628	(541,707)	36,895,243
General administrative expenses (-)	(9,152,491)	(3,958,385)	(631,793)	(3,418,082)	555,451	(16,605,300)
Other income / (expense) from operating activities - net	(905,918)	1,279,138	862,569	(5,362)	(13,744)	1,216,683
Operating profit / (loss)	17,558,231	5,215,646	1,614,565	(2,881,816)	-	21,506,626
Financial income	573,067	6,465,466	469,651	2,714,802	(7,387,689)	2,835,297
Financial expense (-)	(12,921,647)	(3,121,710)	(1,531,833)	(3,592,693)	7,387,689	(13,780,194)
Monetary gains / (losses)	(4,161,825)	(1,885,830)	163,002	2,929,478	-	(2,955,175)
Profit / (loss) before taxation on income	1,047,826	6,673,572	715,385	(830,229)	-	7,606,554
Current tax expense (-)	-	(159,137)	(60,495)	(320,453)	-	(540,085)
Deferred tax income / (expense)	3,450,348	(2,084,736)	(151,520)	(1,758,501)	-	(544,409)
Net profit / (loss) for the period	4,498,174	4,429,699	503,370	(2,909,183)	-	6,522,060

(*) TL 2,570,718 of TL 4,805,363 depreciation and amortization expenses, represents amortization expenses of intangible assets (Note 13), which is presented as unallocated under general administrative expenses. The majority of financial expenses under unallocated part mainly represent costs of loans utilized for the acquisitions of distribution and retail business and financial incomes under unallocated part mainly represents the interest income from intercompany loans given to distribution and retail business. The Group management follows the performances of the operating segments excluding acquisitions related loans, therefore the amounts have not been distributed to the segments.

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NOTE 4 - SEGMENT REPORTING (Continued)

The information below includes information about the Group's financial position of its business segments related to the years ended 31 December 2024 and 31 December 2023.

As at 31 December 2024	Distribution	Retail	Customer Solutions	Unallocated (*)	Eliminations	Total
Segment assets						
Cash and cash equivalents	2,261,558	6,806,519	384,822	34,968	-	9,487,867
Trade receivables	9,183,168	16,484,031	6,175,180	103,901	(5,871,345)	26,074,935
Inventories	2,216,511	-	1,637,272	-	-	3,853,783
Derivative instruments	-	2,786	6,809	-	-	9,595
Financial assets	43,200,316	-	-	(11,241)	-	43,189,075
Right of use assets	954,378	155,270	570	30,299	-	1,140,517
Property, plant and equipment	7,995,817	322,809	1,247,894	388,368	-	9,954,888
Intangible assets	289,733	399,510	445,058	45,190,784	-	46,325,085
Deferred tax assets	22,419,793	1,255,936	98,581	588,713	-	24,363,023
Other receivables and assets	10,203,627	9,820,134	1,422,756	34,227,784	(40,320,691)	15,353,610
Total assets	98,724,901	35,246,995	11,418,942	80,553,576	(46,192,036)	179,752,378
Segment liabilities						
Financial liabilities	17,544,904	2,871,787	7,891,324	41,342,655	(15,699,602)	53,951,068
Other financial liabilities	861,621	-	-	-	-	861,621
Trade payables	10,167,144	15,064,499	266,616	222,723	(5,871,345)	19,849,637
Derivative instruments	326,200	9,293	28,956	-	-	364,449
Deferred tax liabilities	-	-	419,773	10,576,942	-	10,996,715
Other payables and liabilities	28,838,822	13,477,729	1,052,208	525,190	(24,621,089)	19,272,860
Total liabilities	57,738,691	31,423,308	9,658,877	52,667,510	(46,192,036)	105,296,350

(*) The majority of intangible assets under unallocated part represents customer contracts, transfer of operating rights and goodwill (Note 13).

(*) As of 31 December 2024, the Group has recorded an impairment provision of TL 11,241 for its financial assets from service concession arrangements in accordance with TFRS 9 Financial Instruments.

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NOTE 4 - SEGMENT REPORTING (Continued)

As at 31 December 2023	Distribution	Retail	Customer Solutions	Unallocated (*)	Eliminations	Total
Segment assets						
Cash and cash equivalents	1,620,783	3,533,517	1,340,977	3,565	-	6,498,842
Trade receivables	9,357,207	17,733,951	1,501,779	107,929	(5,086,390)	23,614,476
Inventories	3,783,851	-	1,914,196	-	-	5,698,047
Derivative instruments	289,749	339,704	200,594	-	-	830,047
Financial assets	45,861,547	-	-	(9,438)	-	45,852,109
Right of use assets	976,732	266,031	823	40,633	-	1,284,219
Property, plant and equipment	8,281,890	311,844	899,200	20,898	-	9,513,832
Intangible assets	268,617	382,098	375,508	47,751,786	-	48,778,009
Deferred tax assets	28,179,145	1,172,208	50,309	962,245	-	30,363,907
Other receivables and assets	9,943,040	10,777,254	1,673,594	34,478,196	(38,586,403)	18,285,681
Total assets	108,562,561	34,516,607	7,956,980	83,355,814	(43,672,793)	190,719,169
Segment liabilities						
Financial liabilities	16,820,411	6,578,484	4,458,429	37,341,746	(17,047,030)	48,152,040
Other financial liabilities	1,312,915	-	-	-	-	1,312,915
Trade payables	15,028,870	13,212,575	170,218	77,464	(5,086,390)	23,402,737
Derivative instruments	64,819	416	-	-	-	65,235
Deferred tax liabilities	-	-	205,351	11,222,558	-	11,427,909
Other payables and liabilities	29,076,221	13,586,919	1,542,590	277,910	(21,539,373)	22,944,267
Total liabilities	62,303,236	33,378,394	6,376,588	48,919,678	(43,672,793)	107,305,103

(*) The majority of intangible assets under unallocated part represents customer contracts, transfer of operating rights and goodwill (Note 13).

(*) As of 31 December 2023, the Group has recorded an impairment provision of TL 9,438 for its financial assets from service concession arrangements in accordance with TFRS 9 Financial Instruments.

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NOTE 4 - SEGMENT REPORTING (Continued)

The information below includes depreciation and amortisation expenses and capital expenditures for the Group's business segments related to the years ended 31 December 2024 and 31 December 2023.

1 January - 31 December 2024	Distribution	Retail	Customer Solutions	Unallocated	Eliminations	Total
Depreciation and amortization expenses	(1,615,220)	(342,012)	(135,790)	(2,653,490)	-	(4,746,512)
Purchase of tangible and intangible assets	(928,991)	(297,407)	(368,730)	(442,694)	-	(2,037,822)
Capital expenditures related to service concession arrangements	(16,660,402)	-	-	-	-	(16,660,402)
1 January - 31 December 2023	Distribution	Retail	Customer Solutions	Unallocated	Eliminations	Total
Depreciation and amortization expenses	(1,777,746)	(353,010)	(77,368)	(2,597,239)	-	(4,805,363)
Purchase of tangible and intangible assets	(1,765,150)	(453,689)	(800,521)	(18,696)	-	(3,038,056)
Capital expenditures related to service concession arrangements	(21,318,902)	-	-	-	-	(21,318,902)

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NOTE 5 - RELATED PARTY TRANSACTIONS

The immediate parents and ultimate controlling parties of the Group are Sabancı (incorporated in Türkiye) and E.ON (incorporated in Germany). Transactions between the Company and its subsidiaries have been eliminated on consolidation and are not disclosed in this note.

Transactions with related parties are classified according to the following groups and include all related party disclosures:

- (1) Sabancı Holding and E.ON group companies
- (2) Shareholder

Details of transactions between the Group and other related parties are disclosed below:

	31 December 2024	31 December 2023
Related party bank balances – Akbank T.A.Ş. (1)		
Demand deposits	2,488,507	1,434,290
Time deposits	-	1,332,453
	<u>2,488,507</u>	<u>2,766,743</u>

Loans provided by related parties	Original currency	Maturity	31 December 2024	
			Current liabilities	Non-current liabilities
Akbank T.A.Ş. (1)	TL	31 December 2031	158,543	1,846,154
			<u>158,543</u>	<u>1,846,154</u>

As of 31 December 2024 the interest rate of the TLREF loan from related parties is TLREF + 2.60%. There is no loan from related parties as of 31 December 2023.

As of 31 December 2024 there is no collateral given for the borrowings.

Related party derivative instruments – Akbank T.A.Ş. (1)

	31 December 2024				
	Contract Amount (USD)	Contract Amount (EUR)	Contract Amount (TL) (*)	Assets	Liabilities
Forward exchanges	14,164	26,328	1,466,901	-	(312,816)
	<u>14,164</u>	<u>26,328</u>	<u>1,466,901</u>	<u>-</u>	<u>(312,816)</u>

	31 December 2023				
	Contract Amount (USD)	Contract Amount (EUR)	Contract Amount (TL) (*)	Assets	Liabilities
Forward exchanges	78,435	38,765	3,571,712	595,329	(22,522)
	<u>78,435</u>	<u>38,765</u>	<u>3,571,712</u>	<u>595,329</u>	<u>(22,522)</u>

(*) Contract amounts are presented in nominal values.

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NOTE 5 - RELATED PARTY TRANSACTIONS (Continued)

Balances with Related Parties	31 December 2024			
	Receivables		Payables	
	Current Trade	Non-current Trade	Current Trade	Other
Akbank T.A.Ş. (1)	40,003	-	-	-
Aksigorta A.Ş. (1)	-	-	179,630	-
Avivasa Emeklilik ve Hayat A.Ş. (1)	4,336	-	-	-
Brisa Bridgestone Sabancı Lastik San. ve Tic. A.Ş. (1)	68,392	24,515	-	-
Carrefoursa A.Ş. (1)	1,442	-	-	-
Çimsa Çimento Sanayi A.Ş. (1)	29,904	33,094	-	-
Enerjisa Üretim Santralleri A.Ş. (1)	287	-	88,405	-
Hacı Ömer Sabancı Holding A.Ş. (2)	3,582	-	2,493	-
Sabancı Dijital Teknolojileri A.Ş. (1)	-	-	21,382	-
Teknosa İç ve Dış Ticaret A.Ş. (1)	3,189	217	-	-
Temsa Global San. ve Tic. A.Ş. (1)	5,537	8,769	-	-
Other Sabancı Holding Companies (1)	1,624	-	609	-
	<u>158,296</u>	<u>66,595</u>	<u>292,519</u>	<u>-</u>

Balances with Related Parties	31 December 2023			
	Receivables		Payables	
	Current Trade	Non-current Trade	Current Trade	Other
Akbank T.A.Ş. (1)	39,092	-	-	-
Aksigorta A.Ş. (1)	-	-	79,264	29,886
Brisa Bridgestone Sabancı Lastik San. ve Tic. A.Ş. (1)	69,484	22,692	-	-
Carrefoursa A.Ş. (1)	17,863	-	640	-
Çimsa Çimento Sanayi A.Ş. (1)	12,199	72,204	-	-
Enerjisa Üretim Santralleri A.Ş. (1)	462	-	104,958	-
Hacı Ömer Sabancı Holding A.Ş. (2)	2,785	-	14,556	-
Sabancı Dijital Teknolojileri A.Ş. (1)	-	-	13,458	-
Kordsa Teknik Tekstil A.Ş. (1)	-	-	175	-
Teknosa İç ve Dış Ticaret A.Ş. (1)	3,094	690	-	-
Temsa Global San. ve Tic. A.Ş. (1)	5,375	14,165	-	-
Other Sabancı Holding Companies (1)	1,980	-	588	-
	<u>152,334</u>	<u>109,751</u>	<u>213,639</u>	<u>29,886</u>

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NOTE 5 - RELATED PARTY TRANSACTIONS (Continued)

Key Management Compensation

Key management includes Chairman and members of the Board of Directors, General Manager, Heads of Units and Directors. The compensation paid or payable to key management is shown below:

	1 January - 31 December 2024	1 January - 31 December 2023
Short-term key management benefits	372,088	382,178
Long-term key management benefits	11,051	11,402
	<u>383,139</u>	<u>393,580</u>

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NOTE 5 - RELATED PARTY TRANSACTIONS (Continued)

Transactions with Related Parties	1 January - 31 December 2024						
	Electricity sales	Electricity purchases	Interest income	Interest expense	General administrative expenses	Other income	
Akbank T.A.Ş. (1)	414,950	-	67,210	48,971	-	-	
Akçansa Çimento Sanayi ve Ticaret A.Ş. (1)	504	-	-	-	-	-	
Aksigorta A.Ş. (1)	253	-	-	-	696,240	24	
Avivasa Emeklilik ve Hayat A.Ş. (1)	45,631	-	-	-	-	10	
Brisa Bridgestone Sabancı Lastik San. ve Tic. A.Ş. (1) (*)	2,157	-	-	-	-	70,511	
Carrefoursa A.Ş. (1) (*)	3,745	-	-	-	14,960	15,889	
Çimsa Çimento Sanayi A.Ş. (1) (*)	13,307	-	-	-	-	24,516	
Enerjisa Üretim Santralleri A.Ş. (1)	531,472	1,649,938	-	-	-	37,945	
Hacı Ömer Sabancı Holding A.Ş. (2)	28,838	-	-	-	-	-	
Sabancı Dijital Teknolojileri A.Ş. (1)	-	-	-	-	170,546	-	
Teknosa İç ve Dış Ticaret A.Ş. (1) (*)	33,661	-	-	-	2,475	1,344	
Temsa Global San. ve Tic. A.Ş. (1) (*)	-	-	-	-	-	4,142	
Other Sabancı Holding Companies (1)	2,296	-	-	-	-	1,983	
	<u>1,076,814</u>	<u>1,649,938</u>	<u>67,210</u>	<u>48,971</u>	<u>884,221</u>	<u>156,364</u>	

(*) Other revenues from related companies consist of revenues related to the services for renewable energy solutions and energy efficiency projects provided by Enerjisa Müşteri Çözümleri A.Ş..

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NOTE 5 - RELATED PARTY TRANSACTIONS (Continued)

	1 January - 31 December 2023						
Transactions with Related Parties	Electricity sales	Electricity purchases	Interest income	Interest expense	General administrative expenses	Other income	
Akbank T.A.Ş. (1)	519,915	-	56,949	1,268,606	-	-	
Akçansa Çimento Sanayi ve Ticaret A.Ş. (1)	565	-	-	-	-	-	
Aksigorta A.Ş. (1)	271	-	-	-	527,934	39	
Avivasa Emeklilik ve Hayat A.Ş. (1)	28	-	-	-	-	-	
Brisa Bridgestone Sabancı Lastik San. ve Tic. A.Ş. (1)	2,752	-	-	-	-	85,534	
Carrefoursa A.Ş. (1)	351,523	-	-	-	899	15,056	
Çimsa Çimento Sanayi A.Ş. (1)	17,203	-	-	-	-	114,528	
Enerjisa Üretim Santralleri A.Ş. (1)	7,825	5,792,744	-	-	-	27,718	
Hacı Ömer Sabancı Holding A.Ş. (2)	39,816	-	-	-	-	-	
Sabancı Dijital Teknolojileri A.Ş. (1)	-	-	-	-	142,829	-	
Teknosa İç ve Dış Ticaret A.Ş. (1)	42,133	-	-	-	-	2,361	
Temsa Global San. ve Tic. A.Ş. (1)	-	-	-	-	-	7,620	
Tursa Sabancı Turizm ve Yatırım İşletmeleri A.Ş. (1)	-	-	-	-	-	1,025	
Other Sabancı Holding Companies (1)	323	-	-	-	-	-	
	<u>982,354</u>	<u>5,792,744</u>	<u>56,949</u>	<u>1,268,606</u>	<u>671,662</u>	<u>253,881</u>	

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NOTE 6 - TRADE RECEIVABLES AND PAYABLES

6.1 Trade Receivables

	31 December 2024	31 December 2023
Current Trade Receivables		
Trade receivables (*)	27,448,331	30,520,501
Due from related parties (Note 5)	158,296	152,334
Allowance for doubtful receivables (-)	(7,154,349)	(8,246,391)
	<u>20,452,278</u>	<u>22,426,444</u>
Non-Current Trade Receivables		
Trade receivables	5,556,062	1,078,281
Due from related parties (Note 5)	66,595	109,751
	<u>5,622,657</u>	<u>1,188,032</u>

(*) EMRA determines regulated margin and revenue requirements for regulated sales based on demand, energy supply costs and consumption forecasts. However, the actual demand and supply costs may show some differences from forecasts. These differences are recognized in trade receivables.

As of 31 December 2024, trade receivables amounting TL 21,263,057 (31 December 2023: TL 17,919,801) were neither past due nor impaired. Interest is charged at 3.5% for the period of 1 January 2024 – 20 May 2024 and for the period of 21 May 2024 – 31 December 2024 4.5% per month on the overdue receivable balances (1 January 2023 – 14 November 2023 2.5% and for the period of 15 November 2023 – 31 December 2023 3.5%).

As of 31 December 2024, trade receivables amounting TL 4,811,878 (31 December 2023: TL 5,694,675) were past due but not impaired. The aging analysis of trade receivables past due but not impaired as of 31 December 2024 and 31 December 2023 is as follows:

	31 December 2024	31 December 2023
Up to 1 month	2,616,853	2,740,481
1 to 3 months	892,011	1,190,466
Over 3 months	1,303,014	1,763,728
	<u>4,811,878</u>	<u>5,694,675</u>

The Group recognizes the impairment of trade receivables, weighting the lifetime expected credit losses by default (Probability of Default) for all trade receivables excluding distribution segment on each customer basis and including non-overdue receivables.

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NOTE 6 - TRADE RECEIVABLES AND PAYABLES (Continued)

6.1 Trade Receivables (Continued)

Movement of allowance for the doubtful trade receivables are as follows:

	1 January - 31 December 2024	1 January - 31 December 2023
Opening balance	(8,246,391)	(9,931,817)
Charge for the period	(2,549,664)	(3,980,522)
Amounts collected during the period	922,376	571,754
Write offs	14,910	57,935
Inflation effect	2,704,420	5,036,259
Closing balance	<u>(7,154,349)</u>	<u>(8,246,391)</u>

The Group received guarantee letters amounting to TL 9,025,855 (31 December 2023: TL 11,104,935) and deposits amounting to TL 12,115,370 (31 December 2023: TL 11,691,370) as collateral for its electricity receivables. All trade receivables with recognized provisions are secured by guarantee letters and deposits received.

6.2 Trade Payables

	31 December 2024	31 December 2023
Current Trade Payables	<u>19,557,118</u>	<u>23,189,098</u>
Trade payables	292,519	213,639
Due to related parties (Note 5)	<u>19,849,637</u>	<u>23,402,737</u>

Trade payables mainly arise from the Group's electricity purchases from Türkiye Elektrik Üretim A.Ş. ("EÜAŞ") and Enerji Piyasaları İşletme A.Ş. ("EPİAŞ") and payables related to transmission costs invoiced by Türkiye Elektrik İletim A.Ş. ("TEİAŞ"). The average maturity of the payables related to electricity purchases is 55 days.

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NOTE 7 - OTHER RECEIVABLES AND PAYABLES

7.1 Other Receivables

	31 December 2024	31 December 2023
Other Current Receivables	<u>5,258,350</u>	<u>6,974,767</u>
Income accruals (*)	31,354	27,461
Deposits and guarantees given	96	82
Receivables from personnel	(194,133)	(280,287)
Allowance for other doubtful receivables (-) (**)	1,126,653	1,190,865
Other sundry receivables (***)	<u>6,222,320</u>	<u>7,912,888</u>
Other Non-Current Receivables	<u>2,057,454</u>	<u>1,973,595</u>
Deposits and guarantees given (****)	2,793,901	-
Income accruals (*)	1,409,493	1,434,309
Other sundry receivables (*****)	<u>6,260,848</u>	<u>3,407,904</u>

(*) According to the Electricity Market Law, the Electricity Market Tariffs Communiqué and other related regulations the Group's distribution, transmission and meter reading services are subject to revenue caps. Realized revenue is determined in a way to cover operating expenses and investment requirements related to distribution, transmission and meter reading. Moreover, transmission revenue is a complete pass-through of transmission costs as charged by Türkiye Elektrik İletim A.Ş. These regulations guarantee revenue to the Group regardless of the consumption level. The under billings or overbillings made by the Group are calculated at every year end and are adjusted through the tariffs to be effective in two years by EMRA. The effects of the under billings, which means the actual revenue is below the revenue cap set by EMRA, are accounted as income accruals at the Group's accompanying consolidated financial statements.

(**) As of 31 December 2024, TL 191,027 of the amount arises from provision related to general lighting receivables which are disputed.

(***) As of 31 December 2024, TL 660,880 of the amount arises from receivables from tax office and general lighting receivables amounting to TL 191,027 of amount arises from general lighting receivables which are disputed and provision has been provided.

(****) The balance represents subscription fees refunded to the subscribers, subscribed before 31 March 2006 for EPS and 24 July 2006 for AYESAŞ and TOROSLAR EPSAŞ (Note 1) when they leave the system. The balances were paid to the subscribers based on their indexed amounts as required by EMRA periodically. According to the TOR Agreement signed with TEDAŞ, retail companies (EPS, AYESAŞ and TOROSLAR EPSAŞ) are obliged to keep deposits refunded with their fair values and the net balance of deposits received and paid will be paid back to TEDAŞ at the end of the license periods.

(*****) The Group management has assessed that the severance payment provision can be taken with the revenue requirement and has imposed an accrued income for the severance payment provision calculated.

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NOTE 7 - OTHER RECEIVABLES AND PAYABLES (Continued)

7.1 Other Receivables (Continued)

Movement of allowance for other doubtful receivables is as follows:

	1 January - 31 December 2024	1 January - 31 December 2023
Opening balance	(280,287)	(7,430)
Charge for the period	-	(275,778)
Inflation effect	86,154	2,921
Closing balance	<u>(194,133)</u>	<u>(280,287)</u>

7.2 Other Payables

	31 December 2024	31 December 2023
Other Current Payables		
Due to related parties (Note 5)	-	29,886
Deposits received (*)	12,115,370	11,691,373
Lighting payables	6,000	21,657
Other payables (**)	992,770	1,237,229
	<u>13,114,140</u>	<u>12,980,145</u>

(*) The Group receives deposits from the customers subscribed after 31 March 2006 for EPS and 24 July 2006 for AYESAŞ and TOROSLAR EPSAŞ (Note 1) upon their subscription on behalf of TEDAŞ and these deposits are initially recorded at their fair values as the subscription fee charged to customers represents the fees announced by EMRA. According to the TOR Agreements signed with TEDAŞ, retail companies (EPS, AYESAŞ and TOROSLAR EPSAŞ) are obliged to carry the deposits received by their revalued amounts and the net balance of deposits received and paid will be paid back to TEDAŞ at the end of the license period.

(**) Other payables mainly consist of liabilities related to customer penalties.

NOTE 8 – INVENTORIES

	31 December 2024	31 December 2023
Spare parts and equipments	2,214,484	3,780,773
Trade goods	224,471	527,437
Other inventories	1,414,828	1,389,837
	<u>3,853,783</u>	<u>5,698,047</u>

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NOTE 9 - PREPAID EXPENSES AND DEFERRED INCOME

9.1 Prepaid Expenses

	31 December 2024	31 December 2023
Short-term prepaid expenses		
Inventory advances given	634,323	1,227,300
Prepaid expenses	482,100	517,969
Other advances given	50,850	236,032
Personnel advances	33,225	64,507
	<u>1,200,498</u>	<u>2,045,808</u>

	31 December 2024	31 December 2023
Long-term prepaid expenses		
Prepaid expenses	156,561	146,760
	<u>156,561</u>	<u>146,760</u>

9.2 Deferred Income

	31 December 2024	31 December 2023
Short Term Deferred Income		
Deferred income	44,643	29,004
Advances received	9,058	16,627
	<u>53,701</u>	<u>45,631</u>

	31 December 2024	31 December 2023
Long Term Deferred Income		
Deferred income (*)	9,351	4,479,513
	<u>9,351</u>	<u>4,479,513</u>

(*) According to the Electricity Market Law, the Electricity Market Tariffs Communiqué and other related regulations the Group's distribution, transmission and meter reading services are subject to revenue caps. Realized revenue is determined in a way to cover operating expenses and investment requirements related to distribution, transmission and meter reading. Moreover, transmission revenue is a complete pass-through of transmission costs as charged by Türkiye Elektrik İletim A.Ş. These regulations guarantee revenue to the Group regardless of the consumption level. The under billings or overbillings made by the Group are calculated at every year end and are adjusted through the tariffs to be effective in two years by EMRA. The effects of the overbillings, which means the actual revenue is above the revenue cap set by EMRA, are accounted as deferred income at the Group's accompanying consolidated financial statements.

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NOTE 10 - FINANCIAL ASSETS FROM SERVICE CONCESSION ARRANGEMENTS

	Financial assets	
	31 December 2024	31 December 2023
Within one year	8,670,918	8,604,215
1-3 years	14,155,096	20,819,354
More than 3 years	20,363,061	16,428,540
	<u>43,189,075</u>	<u>45,852,109</u>
Current financial assets from service concession arrangements	8,670,918	8,604,215
Non-current financial assets from service concession arrangements	34,518,157	37,247,894
	<u>43,189,075</u>	<u>45,852,109</u>
	1 January -	1 January -
	31 December 2024	31 December 2023
Opening balance	45,852,109	35,999,954
Investments (*)	15,028,125	25,038,788
Collections	(20,553,774)	(19,612,143)
<i>CAPEX reimbursements (**)</i>	<i>(12,996,100)</i>	<i>(12,265,746)</i>
<i>WACC reimbursements</i>	<i>(7,557,674)</i>	<i>(7,346,397)</i>
Tariff corrections (***)	(1,027,815)	1,431,140
Financial income from service concession arrangements (Note 19)	19,750,220	21,174,859
(Recognition) / Reversal of impairment for financial assets	(4,703)	(6,200)
Inflation effect	(15,855,087)	(18,174,289)
Closing balance	<u>43,189,075</u>	<u>45,852,109</u>

(*) Investments amounting to TL 13,092,712 consists of the main balance arising from the presentation before TAS 29 and TL 1,935,413 consists of the monetary loss gain arising from the purchasing power indexation after TAS 29 as at 31 December 2024 (2023: TL 13,563,795 main balance arising from the presentation before TAS 29, TL 11,474,993 purchasing power indexation after TAS 29).

(**) TL 11,322,383 of the capex reimbursement amount consists of the main balance arising from the presentation before TAS 29 and TL 1,673,717 consists of the monetary loss gain arising from the purchasing power indexation presentation after TAS 29 as at 31 December 2024 (2023: TL 6,175,433 main balance arising from the presentation before TAS 29, TL 6,090,313 purchasing power indexation amount after TAS 29).

(***) The related amount arises from the adjustment of the provisionally recorded unit price profit/loss amount for 2023 upon realization in the current period.

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NOTE 11 - RIGHT OF USE ASSETS

	Buildings	Motor vehicles	Total
Cost			
Opening balance as of 1 January 2024	1,208,957	3,240,546	4,449,503
Additions	114,703	553,698	668,401
Variable lease payment adjustments and changes in lease conditions	(74,884)	-	(74,884)
Closing balance as of 31 December 2024	<u>1,248,776</u>	<u>3,794,244</u>	<u>5,043,020</u>
Accumulated Depreciation			
Opening balance as of 1 January 2024	(686,127)	(2,479,157)	(3,165,284)
Charge for the period	(195,866)	(541,353)	(737,219)
Closing balance as of 31 December 2024	<u>(881,993)</u>	<u>(3,020,510)</u>	<u>(3,902,503)</u>
Carrying value as of 31 December 2024	<u>366,783</u>	<u>773,734</u>	<u>1,140,517</u>
	Buildings	Motor vehicles	Total
Cost			
Opening balance as of 1 January 2023	810,001	2,741,434	3,551,435
Additions	376,577	500,118	876,695
Variable lease payment adjustments and changes in lease conditions	22,379	-	22,379
Disposals	-	(1,006)	(1,006)
Closing balance as of 31 December 2023	<u>1,208,957</u>	<u>3,240,546</u>	<u>4,449,503</u>
Accumulated Depreciation			
Opening balance as of 1 January 2023	(515,052)	(1,676,196)	(2,191,248)
Charge for the period	(171,075)	(803,534)	(974,609)
Disposals	-	573	573
Closing balance as of 31 December 2023	<u>(686,127)</u>	<u>(2,479,157)</u>	<u>(3,165,284)</u>
Carrying value as of 31 December 2023	<u>522,830</u>	<u>761,389</u>	<u>1,284,219</u>

Depreciation expenses of TL 737,219 are accounted in general administrative expenses (31 December 2023: TL 974,609).

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NOTE 12 - PROPERTY, PLANT AND EQUIPMENTS

	Plant, machinery and equipment	Leasehold improvements	Motor vehicles	Furniture and fixtures	Construction in progress	Total
Cost						
Opening balance as of 1 January 2024	6,834,989	136,952	159,023	3,724,372	2,969,946	13,825,282
Additions	542,707	37,506	419,029	758,167	197,535	1,954,944
Transfers to financial assets	-	-	-	-	(253,923)	(253,923)
Transfers from construction in progress	-	23,909	-	-	(210,264)	(186,355)
Closing balance as of 31 December 2024	7,377,696	198,367	578,052	4,482,539	2,703,294	15,339,948
Accumulated Depreciation						
Opening balance as of 1 January 2024	(2,447,070)	(26,089)	(156,361)	(1,681,930)	-	(4,311,450)
Charge for the period	(517,060)	(25,227)	(49,705)	(481,618)	-	(1,073,610)
Closing balance as of 31 December 2024	(2,964,130)	(51,316)	(206,066)	(2,163,548)	-	(5,385,060)
Carrying value as of 31 December 2024	4,413,566	147,051	371,986	2,318,991	2,703,294	9,954,888
Cost						
Opening balance as of 1 January 2023	6,132,992	-	156,921	2,629,299	2,963,579	11,882,791
Additions	701,997	136,952	2,102	1,095,073	670,519	2,606,643
Transfers to financial assets	-	-	-	-	(489,696)	(489,696)
Transfers from construction in progress	-	-	-	-	(174,456)	(174,456)
Closing balance as of 31 December 2023	6,834,989	136,952	159,023	3,724,372	2,969,946	13,825,282
Accumulated Depreciation						
Opening balance as of 1 January 2023	(1,931,872)	-	(155,604)	(1,306,343)	-	(3,393,819)
Charge for the period	(515,198)	(26,089)	(757)	(375,587)	-	(917,631)
Closing balance as of 31 December 2023	(2,447,070)	(26,089)	(156,361)	(1,681,930)	-	(4,311,450)
Carrying value as of 31 December 2023	4,387,919	110,863	2,662	2,042,442	2,969,946	9,513,832

Useful Life

Plant, machinery and equipment

5-25 years

Motor vehicles

3 years

Furniture and fixtures

5 years

Depreciation expense of TL 894,242 and TL 179,368 are accounted in general administrative expenses and cost of sales, respectively (31 December 2023: general administrative expenses: TL 846,399 and cost of sales: TL 71,232).

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NOTE 13 - INTANGIBLE ASSETS

	Customer contracts and related relationships	Transfer of operating rights	Goodwill	Computer software	Other intangible assets	Total
Cost						
Opening balance as of 1 January 2024	54,356,569	19,999,202	2,857,080	2,200,477	362,581	79,775,909
Additions	-	-	-	290,444	5,960	296,404
Transfers from constructions in progress	-	-	-	186,355	-	186,355
Closing balance as of 31 December 2024	54,356,569	19,999,202	2,857,080	2,677,276	368,541	80,258,668
Accumulated Amortization						
Opening balance as of 1 January 2024	(22,087,623)	(7,361,713)	-	(1,497,349)	(51,215)	(30,997,900)
Charge for the period	(1,890,162)	(687,600)	-	(356,848)	(1,073)	(2,935,683)
Closing balance as of 31 December 2024	(23,977,785)	(8,049,313)	-	(1,854,197)	(52,288)	(33,933,583)
Carrying value as of 31 December 2024	30,378,784	11,949,889	2,857,080	823,079	316,253	46,325,085
Cost						
Opening balance as of 1 January 2023	54,356,569	19,999,202	2,857,080	1,758,350	220,791	79,191,992
Additions	-	-	-	267,671	141,790	409,461
Transfers from constructions in progress	-	-	-	174,456	-	174,456
Closing balance as of 31 December 2023	54,356,569	19,999,202	2,857,080	2,200,477	362,581	79,775,909
Accumulated Amortization						
Opening balance as of 1 January 2023	(20,202,625)	(6,675,993)	-	(1,162,643)	(43,516)	(28,084,777)
Charge for the period	(1,884,998)	(685,720)	-	(334,706)	(7,699)	(2,913,123)
Closing balance as of 31 December 2023	(22,087,623)	(7,361,713)	-	(1,497,349)	(51,215)	(30,997,900)
Carrying value as of 31 December 2023	32,268,946	12,637,489	2,857,080	703,128	311,366	48,778,009

Amortization expense of TL 2,931,647 and TL 4,036 are accounted in general administrative expenses and cost of sales, respectively (31 December 2023: general administrative expenses: TL 2,907,177 and cost of sales: TL 5,946).

Customer contracts and related relationships and transfer of operating rights are recognized separately during the business combination according to TFRS 3.

On 31 March 2006 BAŞKENT EDAŞ and on 24 July 2006, AYEDAŞ and TOROSLAR EDAŞ signed TOR Agreement with TEDAŞ. In accordance with the TOR agreement, TEDAŞ transferred the operating rights of the distribution system, the distribution facilities, and the other movables and immovable which are crucial for the operation of the distribution facilities to BAŞKENT EDAŞ until the end of 2036 and to AYEDAŞ and TOROSLAR EDAŞ until the end of 2042. Based on the future cash flows fair value of the TOR agreements are determined. The residual value of TOR after the portion recognized as financial asset which calculated based on TFRIC 12 (Note 10) is recognized as intangible asset based on TFRS 3.

In recognition of customer contracts and related relationships; relationships with the different customer groups are identified and a fair value for retail customers is estimated by Group management at the acquisition dates.

Customer contracts and related relationships and TOR amortization is calculated on a straight-line basis in a range between 25 - 30 years and charged to operating expenses.

As of 31 December 2024, there is no impairment on goodwill (31 December 2023: None).

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NOTE 14 - PROVISIONS

	31 December 2024	31 December 2023
Current Provisions		
Legal claims (*)	833,429	937,141
Other provisions (**)	72,830	-
	<u>906,259</u>	<u>937,141</u>

(*) Legal claims are set for the probable cash outflows related to the legal disputes. As of 31 December 2024, the provision amount for the legal claims are determined according to the assessment made by the Group management, considering the probability of legal cases that will be finalized against the Group.

(**) The related amount consists of provisions for penalties and late payment penalties related to VAT and corporate tax corrections.

Movements of provisions are as follows:

	Other provisions	Legal claims	Total
Opening balance as of 1 January 2024	-	937,141	937,141
Additional provisions recognized	83,596	258,507	342,103
Reversal of provisions	-	(46,913)	(46,913)
Inflation effect	(10,766)	(315,306)	(326,072)
Closing balance as of 31 December 2024	<u>72,830</u>	<u>833,429</u>	<u>906,259</u>

	Other provisions	Legal claims	Total
Opening balance as of 1 January 2023	-	882,466	882,466
Additional provisions recognized	-	532,872	532,872
Reversal of provisions	-	(19,422)	(19,422)
Inflation effect	-	(458,775)	(458,775)
Closing balance as of 31 December 2023	<u>-</u>	<u>937,141</u>	<u>937,141</u>

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NOTE 15 - COMMITMENT AND CONTINGENCIES

31 December 2024	TL Equivalent (*)	TL	USD	EUR
A. Total amount of Collateral Pledge Mortgage (CPM) given on behalf of the legal entity	15,322	15,322	-	-
- Collateral	15,322	15,322	-	-
B. Total amount of CPM given against the subsidiaries included in full consolidation	22,270,287	22,053,348	5,821	315
- Collateral	22,270,287	22,053,348	5,821	315
Total	<u>22,285,609</u>	<u>22,068,670</u>	<u>5,821</u>	<u>315</u>

31 December 2023	TL Equivalent (*)	TL	USD	EUR
A. Total amount of Collateral Pledge Mortgage (CPM) given on behalf of the legal entity	12,518	12,518	-	-
- Collateral	12,518	12,518	-	-
B. Total amount of CPM given against the subsidiaries included in full consolidation	18,420,942	17,219,197	39,663	1,048
- Collateral	18,420,942	17,219,197	39,663	1,048
Total	<u>18,433,460</u>	<u>17,231,715</u>	<u>39,663</u>	<u>1,048</u>

(*) TL equivalent amounts are presented in nominal values.

Mandatory investments

As the regulated incumbent electricity distribution operator, the distribution companies have an obligation to make any required expansion investments to the grid infrastructure in order to ensure the security of supply to all customers of the respective region. Such expansion investments are mostly a result of new customer or transmission connection requests as well as new street lighting projects initiated by municipalities that also fall under the regulated activities of Distribution companies.

Energy sales agreements

Distribution and retail companies signed Energy Sales Agreements with EÜAŞ in order to obtain their energy needs during the year. These energy sales agreements have been established based on regulated prices. During the year, the Group is obliged to purchase the energy quantity stated in these agreements. At the current operating conditions and market structure, the Group's energy needs are higher than the contracted quantities and the Group makes purchases regularly from EPIAŞ. As a result, the Group management does not expect any liability related to the Energy Sales Agreements arising from not fulfilling the requirements of Energy Sales Agreements.

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NOTE 16 - EMPLOYMENT BENEFITS

<u>Payables Related to Employee benefits</u>	31 December 2024	31 December 2023
Social security premiums payable	648,986	649,105
Payable to personnel	593,308	317,356
	<u>1,242,294</u>	<u>966,461</u>
<u>Short-term Provisions Related to Employee Benefits</u>	31 December 2024	31 December 2022
Bonus provisions	667,178	646,642
	<u>667,178</u>	<u>646,642</u>
<u>Long-term Provisions Related to Employee Benefits</u>	31 December 2024	31 December 2022
Provisions for unused vacation	458,884	397,595
Provision for employment termination benefits	1,521,590	1,550,433
	<u>1,980,474</u>	<u>1,948,028</u>

The movement of bonus and unused vacation provisions are as follows:

	Bonus provisions	Unused vacation provision	Total
Opening balance as of 1 January 2024	646,642	397,595	1,044,237
Additional provisions recognized	744,030	291,441	1,035,471
Payments	(353,489)	(80,815)	(434,304)
Reversal of provisions	(138,825)	-	(138,825)
Inflation effect	(231,180)	(149,337)	(380,517)
Closing balance as of 31 December 2024	<u>667,178</u>	<u>458,884</u>	<u>1,126,062</u>
	Bonus provisions	Unused vacation provision	Total
Opening balance as of 1 January 2023	322,079	357,847	679,926
Additional provisions recognized	816,419	230,681	1,047,100
Payments	(239,556)	-	(239,556)
Inflation effect	(252,300)	(190,933)	(443,233)
Closing balance as of 31 December 2023	<u>646,642</u>	<u>397,595</u>	<u>1,044,237</u>

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NOTE 16 - EMPLOYMENT BENEFITS (Continued)

Under Turkish Labor Law, the Group is required to pay termination benefits to each employee who has completed certain years of service and whose employment is terminated without due cause, who is called up for military service, dies or retires after completing 25 years of service and reaches the retirement age (58 for women and 60 for men).

The amount payable consists of one month's salary limited to a maximum of TL 41,828.42 (full digit) (31 December 2023: TL 23,489.83 (full digit, nominal)) for each period of service at 31 December 2023.

The provision has been calculated by estimating the present value of the future probable obligation of the Group arising from the retirement of employees. TAS 19 *Employee Benefits* requires actuarial valuation methods to be developed to estimate the enterprise's obligation under defined benefit plans. Accordingly, the following actuarial assumptions were used in the calculation of the total liability.

The principal assumption is that the maximum liability for each year of service will increase parallel with inflation. Thus, the discount rate applied represents the expected real rate after adjusting for the anticipated effects of future inflation. Consequently, in the accompanying consolidated financial statements as at 31 December 2024, the provision has been calculated by estimating the present value of the future probable obligation of the Group arising from the retirement of the employees. The provisions at the respective balance sheet dates have been calculated assuming an annual inflation rate of 24.51% and a discount rate of 27.90%, resulting in a real discount rate of approximately 2.72% (31 December 2023: inflation rate of 24.61% and a discount rate of 28.00%, resulting in a real discount rate of approximately 2.72%) Ceiling amount of TL 46,655.43 (full digit) which is in effect since 1 January 2025 is used in the calculation of Groups' provision for retirement pay liability (1 January 2024: TL 35,058.58 (full digit, nominal)).

Group management has assessed that the severance payment provisions of electricity distribution companies within the Group can be taken with the revenue requirement according to the changed tariff structure at third tariff period and has accounted accrued income for the severance payment provisions calculated for those companies as of 31 December 2024 and 31 December 2023.

The movement for retirement payment provisions is as follows:

	1 January - 31 December 2024	1 January - 31 December 2023
Opening balance	1,550,433	2,385,696
Service cost	1,026,546	392,713
Interest cost	319,481	429,979
Retirement payments	(832,118)	(691,554)
Inflation effect	(542,752)	(966,401)
Closing balance	<u>1,521,590</u>	<u>1,550,433</u>

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NOTE 17 - OTHER ASSETS AND LIABILITIES

17.1 Other Current Assets

	31 December 2024	31 December 2023
Deferred VAT	1,275,893	3,265,052
VAT recoverable	7,738	-
Other	176,371	100,959
	<u>1,460,002</u>	<u>3,366,011</u>

17.2 Other Non-current Assets

	31 December 2024	31 December 2023
Other	21,137	39,830
	<u>21,137</u>	<u>39,830</u>

17.3 Other Current Liabilities

	31 December 2024	31 December 2023
Taxes and funds payable	1,031,245	869,544
Other	1,374	18,347
	<u>1,032,619</u>	<u>887,891</u>

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NOTE 18 - SHARE CAPITAL, RESERVES AND OTHER EQUITY ITEMS

18.1 Share Capital

Shareholders	31 December 2024		31 December 2023	
	Share (%)	TL	Share (%)	TL
Hacı Ömer Sabancı Holding A.Ş.	40	472,427.6	40	472,427.6
E.ON International Participations N.V. (E.ON)	40	472,427.6	40	472,427.6
Other	20	236,213.8	20	236,213.8
	<u>100</u>	<u>1,181,069</u>	<u>100</u>	<u>1,181,069</u>
Adjustment to share capital		13,488,262		13,488,262
Share premium (*)		29,681,065		31,353,365
Total share capital		<u>44,350,396</u>		<u>46,022,696</u>

(*) Share premium, refers to the amount of registered capital as a capital reserve in the statutory capital after the merger and separation processes according to the legislation.

With the decision of the Board of Directors on 20 April 2017, Enerjisa Enerji A.Ş. merged with Enerjisa Elektrik Dağıtım A.Ş. ("EEDAŞ") and the subsidiaries of EEDAŞ together with all their assets and liabilities with the takeover method. In addition, on 25 August 2017, the Group's electricity generation and wholesale business areas were separated and structured under another company. As a result of these transactions, necessary corrections are made in the registered share capital and the statutory capital after merger and split has been reached.

During the Ordinary General Assembly held on 4 April 2024, share premiums amounting to TL 1,672,300 has been transferred to retained earnings and subject to dividend distribution (31 December 2023: TL 810,142).

As at 31 December 2024, the capital of the Company comprising 118,106,897 thousand (31 December 2023: 118,106,897 thousand) registered ordinary shares of TL 0.01 each (31 December 2023: TL 0.01 each).

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NOTE 18 - SHARE CAPITAL, RESERVES AND OTHER EQUITY ITEMS (Continued)

18.2 Earnings / (Loss) Per Share

Earnings per share for each class of share disclosed in the consolidated statements of profit or loss and other comprehensive income is determined by dividing the profit for the period attributable to ordinary equity holders of the parent entity by the weighted average number of shares that have been outstanding during the year.

	1 January - 31 December 2024	1 January - 31 December 2023
(Loss) / profit for the period	(4,852,783)	6,522,060
Weighted average shares	118,106,896,712	118,106,896,712
(Loss) /earning per share (kr)	(4.11)	5.52

18.3 Restricted Profit Reserves

	31 December 2024	31 December 2023
Restricted Profit Reserves	3,447,044	3,560,121
	<u>3,447,044</u>	<u>3,560,121</u>

The Company reserves 5% of the historical statutory profit as first legal reserve, until the total reserve reaches 20% of the historical paid in share capital. The other legal reserve is appropriated at the rate of 10% per annum of all cash dividend distributions after the payment of dividends to the shareholders at a rate of 5%. According to Turkish Commercial Law, if they do not exceed the capital or issued capital general legal reserves can be used to offset prior year losses or recapitalize the business in case of distress.

18.4 Additional Information for Capital, Legal Reserves and Other Equity Items

A comparison of the Group's equity items restated for inflation in the consolidated financial statements as of 31 December 2024 and the restated amounts in the financial statements prepared in accordance with Law No. 6762 and other legislation are as follows:

31 December 2024	Inflation adjusted amounts in the financial statements prepared in accordance with Law No. 6762 and other legislation	Inflation adjusted amounts in the financial statements prepared in accordance with TAS/IFRS	Differences recognized in retained earnings
Adjustments to Share Capital	19,722,282	13,488,262	6,234,020
Share Premium	29,884,964	29,681,065	203,899
Restricted Profit Reserves	5,297,170	3,447,044	1,850,126

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NOTE 19 – REVENUE

The Group fulfills its performance obligations by transferring goods and services both over time and at a specific point in time. This is consistent with the revenue information disclosed for each reportable segment under TFRS 8 (Note 4).

	1 January - 31 December 2024	1 January - 31 December 2023
Revenue from electricity sales and services provided	161,945,981	219,738,730
<i>Retail sales revenue</i>	98,464,257	145,263,673
<i>Regulated revenue</i>	46,136,806	87,249,160
<i>Liberalised revenue</i>	52,327,451	58,014,513
<i>Retail service revenue</i>	3,408,914	2,893,888
<i>Distribution lighting sales revenue</i>	5,659,211	8,719,196
<i>Distribution service revenue</i>	28,902,667	25,218,658
<i>Investment expenses</i>	14,000,310	25,038,788
<i>Transmission revenue</i>	11,510,622	12,604,527
Financial income from service concession arrangements (Note 10, 29)	19,750,220	21,174,859
Other revenue (*)	8,888,578	2,602,345
	<u>190,584,779</u>	<u>243,515,934</u>

(*) Other revenue amounting to TL 8.656.907 consists of revenue from Customer Solutions segment (December 31, 2023: TL 2.359.407).

NOTE 20 - COST OF SALES

	1 January - 31 December 2024	1 January - 31 December 2023
Electricity purchases	(103,564,293)	(151,461,758)
<i>Retail energy purchases</i>	(95,172,232)	(140,262,668)
<i>Distribution related energy purchases (*)</i>	(8,392,061)	(11,199,090)
Investment costs	(15,028,125)	(25,038,788)
System usage fee (**)	(11,510,622)	(12,604,527)
Payroll and employee benefit expenses	(7,794,706)	(7,224,217)
Material expenses	(2,739,924)	(4,432,213)
Repair and maintenance expenses	(1,410,817)	(2,310,571)
Fleet management expenses	(1,261,858)	(1,408,715)
Insurance expenses	(867,218)	(360,967)
Depreciation and amortization expenses (Note 12, 13)	(183,404)	(77,178)
Other	(3,499,413)	(1,701,757)
	<u>(147,860,380)</u>	<u>(206,620,691)</u>

(*) Includes theft / loss and lighting related electricity purchases.

(**) Includes system usage costs reflected as transmission revenue.

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NOTE 21 - GENERAL ADMINISTRATIVE EXPENSES

	1 January - 31 December 2024	1 January - 31 December 2023
General administrative expenses (-)	(16,219,046)	(16,605,300)
	<u>(16,219,046)</u>	<u>(16,605,300)</u>

Details of general administrative expenses are as follows:

	1 January - 31 December 2024	1 January - 31 December 2023
Payroll and employee benefit expenses	(7,465,232)	(6,578,812)
Depreciation and amortization expenses (Note 11, 12, 13)	(4,563,108)	(4,728,185)
Legal and lawsuit provision expenses	(852,322)	(1,268,047)
Duties, taxes and levies	(661,468)	(971,629)
Outsourcing expenses	(621,288)	(594,356)
Information technologies expenses	(496,125)	(524,253)
Consulting expenses	(274,211)	(281,800)
Advertisement and promotion expenses	(229,693)	(343,289)
Travel expenses	(166,216)	(246,105)
Post, telephone and communication expenses	(129,027)	(150,261)
Call center expenses	(103,811)	(80,933)
Invoice expenses	(89,992)	(161,232)
Fleet management expenses	(88,587)	(69,570)
Rent expenses	(65,574)	(42,710)
Repair and maintenance expenses	(32,941)	(97,763)
Insurance expenses	(23,722)	(25,559)
Material expenses	(8,204)	(1,509)
Other expenses	(347,525)	(439,287)
	<u>(16,219,046)</u>	<u>(16,605,300)</u>

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NOTE 22 - OTHER INCOME AND EXPENSES FROM OPERATING ACTIVITIES

22.1 Other Income From Operating Activities

	1 January - 31 December 2024	1 January - 31 December 2023
Interest income related to tariff receivables - net (Note 29) (*)	4,501,676	1,815,713
Late payment interest income from electricity receivables	1,786,356	1,592,157
Power theft penalties	567,903	645,301
Income from doubtful receivables - net (Note 6)	131,641	-
Rent and advertisement income	79,833	75,790
Lawsuit income	585	38
Income from operational hedge transactions - net	-	4,807,010
Other income (***)	642,075	1,603,240
	<u>7,710,069</u>	<u>10,539,249</u>

22.2 Other Expenses From Operating Activities

	1 January - 31 December 2024	1 January - 31 December 2023
Rediscount expense for trade receivables	(2,357,300)	(531,110)
Provision for doubtful receivables - net (Note 6)	(1,758,929)	(3,408,768)
Expense from operational hedge transactions - net	(1,257,351)	-
Late payment interest expense	(424,602)	(2,289,225)
Customer penalty expenses	(292,037)	(539,907)
Foreign exchange losses from operating activities - net	(261,318)	(1,681,748)
Donations	(76,481)	(242,529)
Penalty expenses	(8,266)	(5,387)
Impairment provision on financial assets (Note 10) (**)	(4,703)	(6,200)
Other expenses	(175,829)	(617,692)
	<u>(6,616,816)</u>	<u>(9,322,566)</u>

(*) Interest income / (expense) related to tariff receivables are the interest income / (expense) for the receivables arising from the difference between revenue requirement and revenue recognition on cash basis of the Group.

(**) As of 31 December 2024, the Group has been recorded additional impairment provision of TL 4,703 for its financial assets from service concession arrangements in accordance with the amendments in TFRS 9 Financial Instruments Standard (31 December 2023: TL 6,200).

(***) TL 122,663 of the amount arises from the late payment interest incomes of the adjustments made by EMRA within the scope of the resource-based support mechanism made for the year 2023 (31 December 2023: TL 1,053,760).

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NOTE 23 - FINANCE INCOME AND EXPENSES

23.1 Finance Income

	1 January - 31 December 2024	1 January - 31 December 2023
Interest income	2,835,231	2,835,297
	<u>2,835,231</u>	<u>2,835,297</u>

23.2 Finance Expenses

	1 January - 31 December 2024	1 January - 31 December 2023
Interest expenses of borrowings	(22,278,327)	(13,000,991)
Foreign exchange gains / (losses) - net	(477,415)	(224,333)
Bank commission expenses	(341,322)	(554,870)
	<u>(23,097,064)</u>	<u>(13,780,194)</u>

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NOTE 24 - NET MONETARY POSITION GAINS AND LOSSES

Net Monetary Position Gains / (Losses) reported in the consolidated statement of profit or loss arise from the following non-monetary financial statement items:

<u>Non-monetary items</u>	<u>31 December 2024</u>
Inventory	112,417
Prepaid Expenses	214,578
Right of Use Assets	420,813
Property, Plant and Equipment	3,031,889
Intangible Assets	14,892,242
<i>Goodwill</i>	878,202
<i>Other Intangible Assets</i>	14,014,040
Other Current Payables	(3,108,666)
Deferred Tax Assets	8,902,383
Deferred Tax Liabilities	(3,079,062)
Registered Share Capital	(4,509,020)
Share Premium	(9,340,145)
Other Funds	(7,095)
Restricted Profit Reserves	(1,101,574)
Retained Earnings	(9,952,108)
Statement of Financial Position Items	(3,523,348)
Revenue	(22,745,782)
Cost of Sales	17,707,297
General Administrative Expenses	1,384,782
Other Income from Operating Activities	(768,836)
Other Expenses from Operating Activities	876,748
Finance Income	(349,455)
Finance Expense	2,585,124
Current Tax Expense	239,534
Profit or Loss Statement Items	(1,070,588)
Net Monetary Position (Losses) / Gains	(4,593,936)

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NOTE 25 - TAX ASSETS AND LIABILITIES

	31 December 2024	31 December 2023
<u>Current assets related with current taxes</u>		
Prepaid taxes and funds	32,244	1,366,480
	<u>32,244</u>	<u>1,366,480</u>
	31 December 2024	31 December 2023
<u>Current tax liability</u>		
Current corporate tax provision	1,992,031	540,085
Less: Prepaid taxes and funds	(1,705,269)	(252,810)
Inflation effect	(19,918)	(234,460)
	<u>266,844</u>	<u>52,815</u>
	1 January - 31 December 2024	1 January - 31 December 2023
<u>Tax expense recognized in profit or loss</u>		
Current tax expense	(1,992,031)	(540,085)
Deferred tax expense relating to the origination and reversal of temporary differences, net	(5,603,589)	(544,409)
Total tax expense	<u>(7,595,620)</u>	<u>(1,084,494)</u>

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NOTE 25 - TAX ASSETS AND LIABILITIES (Continued)

Corporate tax

The Group is subject to Turkish corporate taxes. A provision is made in the accompanying financial statements for the estimated charge based on the Group's results for the period.

Corporate tax is applied on taxable corporate income, which is calculated from the statutory accounting profit by adding back non-deductible expenses, and by deducting the tax-exempt earnings, other exempt income and other deductions (losses of previous periods, investment incentives utilized).

With the Law No. 7456 published in the Official Gazette dated 15 July 2023, the first paragraph of Article 32 of the Corporate Tax Law was amended and the corporate tax rate was increased to 25% for corporate earnings for the year 2023 and the following taxation periods.

Valid rate of corporate tax as of 31 December 2024 is 25% (31 December 2023: 25%).

In Türkiye, temporary tax is calculated and accrued on a quarterly basis. The companies apply 25% tax rate over their quarterly profits (25% for the year 2023) when calculating their temporary tax payables; which they are obliged to declare via Advance Corporate Tax Declaration by the end of the 14th, and pay by the end of the 17th of the 2 months following the related period. Quarterly Advance Corporate Tax payments made within a year are deducted from the Corporate Income Tax calculated for the same fiscal year. Following the netting-off, if there is still remaining Advance Corporate Tax balance, it can be deducted from any other financial debt owed to the State or can be received in the form of a cash refund.

Losses are allowed to be carried 5 years maximum to be deducted from the taxable profit of the following years. Tax carry back is not allowed.

In Türkiye, there is no procedure for a final and definitive agreement on tax assessments. Companies file their tax returns between 1-25 April following the close of the accounting year to which they relate. Tax authorities may, examine such returns and the underlying accounting records and may revise assessments within five years.

Income withholding tax

In addition to corporate taxes, companies should also calculate income withholding taxes and funds surcharge on any dividends distributed, except for companies receiving dividends who are Turkish residents and Turkish branches of foreign companies. With the Presidential Decree No. 9286 published in the Official Gazette dated 22 December 2024 and numbered 32760, the income withholding tax rate was increased from 10% to 15% (31 December 2023: 10%). Undistributed dividends incorporated in share capital are not subject to income withholding tax.

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NOTE 25 - TAX ASSETS AND LIABILITIES (Continued)

Deferred tax

The Group recognizes deferred tax assets and liabilities on the temporary timing differences between the legal books and the financial statements prepared in accordance with TFRS. Such differences generally arise from timing differences of some revenue and expense balances in legal books and financial statements prepared in accordance with TFRS and are explained below.

As of 31 December 2024, 25% tax rate is used in the deferred tax calculation (31 December 2023: 25%).

	31 December 2024	31 December 2023
Deferred tax (asset)	(24,363,023)	(30,363,907)
Deferred tax liability	10,996,715	11,427,909
Deferred tax (asset) / liability, net	<u>(13,366,308)</u>	<u>(18,935,998)</u>

Movement of deferred tax (assets) / liabilities is as follows:

	1 January - 31 December 2024	1 January - 31 December 2023
Opening balance	(18,935,998)	(18,751,288)
Charged to statement of profit or loss	5,603,589	544,409
Charged to other comprehensive income / expense	(33,899)	(729,119)
Closing balance	<u>(13,366,308)</u>	<u>(18,935,998)</u>

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NOTE 25 - TAX ASSETS AND LIABILITIES (Continued)

Deferred tax (continued)

	31 December 2024	31 December 2023
Deferred tax (assets) / liabilities		
Differences arising from customer contracts and transfer of operational rights	10,582,166	11,226,607
Carrying amount differences of property, plant and equipment, intangible assets and concession arrangement difference	(20,436,884)	(24,946,469)
Carrying amount differences of right of use assets and lease liabilities	29,763	30,335
Provision for employment termination benefits	(33,401)	(35,740)
Provision for doubtful receivables	(90,745)	(157,719)
Provision for lawsuits	(203,296)	(230,882)
Provision for unused vacation	(114,721)	(97,568)
Effect of revenue cap adjustments	918,105	(458,566)
Carry forward tax losses	(2,649,900)	(3,123,392)
Income / (expense) accruals	1,070,671	766,038
Deposit revaluation	(1,612,783)	(1,454,245)
Derivative financial instruments	(80,781)	181,457
Other	(744,502)	(635,854)
	<u>(13,366,308)</u>	<u>(18,935,998)</u>

	1 January - 31 December 2024	1 January - 31 December 2023
Tax Reconciliation:		
Profit from operations before tax	2,742,837	7,606,554
	25%	25%
Tax at the domestic income tax rate of 25% (2023: 25%)	685,709	1,901,639
Tax effects of:		
- revenue that is exempt from taxation	(76)	(31,656)
- expenses that are not deductible in determining taxable profit	154,767	149,818
- effect of deferred tax rate change	-	(2,134,922)
- inflation effect	11,393,623	12,856,483
- deferred tax effect of temporary differences arising from inflation accounting in accordance with tax procedure law (*)	(4,626,824)	(11,582,220)
- other	(11,579)	(74,648)
Income tax (income) / expense recognised in profit or loss	<u>7,595,620</u>	<u>1,084,494</u>

(*) In accordance with the Tax Procedure Law dated 30 December 2023 and numbered 32415 (2nd Repeated), it consists of the deferred tax effect of temporary differences arising from the adjustments made in relation to inflation accounting.

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NOTE 25 - TAX ASSETS AND LIABILITIES (Continued)

Deferred tax (continued)

Deferred tax assets may only be recognized to the extent it is probable that sufficient taxable profit will be available in the future. In case of a probable tax advantage, deferred income tax asset is calculated for unused carry forward tax losses.

At 31 December 2024, the Group recognized deferred tax assets amounting to TL 2,649,900 for unused carry forward tax losses amounting to TL 10,599,601 since it was considered as probable that there would be sufficient taxable income in the subsequent periods to utilise such assets based on the forecasts made (31 December 2023: TL 3,123,392 and TL 12,493,569 respectively).

The expiration dates of previous years' losses on which deferred tax asset was recognized are as follows:

	31 December 2024	31 December 2023
Expiring in 2024	-	782,552
Expiring in 2025	511,910	739,089
Expiring in 2026	485,674	701,070
Expiring in 2027	607,237	876,638
Expiring in 2028	2,981,540	9,394,220
Expiring in 2029	6,013,240	-
	<u>10,599,601</u>	<u>12,493,569</u>

The expiration dates of previous years' losses on which deferred tax asset was not recognized are as follows:

	31 December 2024	31 December 2023
Expiring in 2024	-	2,623
Expiring in 2025	1,805	2,606
	<u>1,805</u>	<u>5,229</u>

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NOTE 26 - FINANCIAL INSTRUMENTS

26.1 Financial liabilities

	31 December 2024	31 December 2023
Short-term borrowings	6,079,993	10,451,822
Short-term portion of long term lease liabilities	325,151	420,489
Short-term portion of long term bonds issued	20,982,749	15,367,242
Short-term portion of long-term borrowings	<u>2,528,490</u>	<u>2,881,308</u>
	29,916,383	29,120,861
Long-term borrowings	9,352,392	3,376,002
Long-term lease liabilities	557,327	542,827
Long-term bonds issued	<u>14,124,966</u>	<u>15,112,350</u>
	24,034,685	19,031,179
Total financial liabilities	<u>53,951,068</u>	<u>48,152,040</u>

The borrowings and bonds issued are repayable as follows:

	31 December 2024	31 December 2023
To be paid within 1 year	29,591,232	28,700,372
To be paid between 1-2 years	17,283,203	16,643,430
To be paid between 2-3 years	2,164,973	899,631
To be paid between 3-4 years	1,870,006	613,932
To be paid between 4-5 years	925,741	331,359
	1,233,435	-
	<u>53,068,590</u>	<u>47,188,724</u>

As of 31 December 2024 and 31 December 2023, the Group has not given any collateral for the loans obtained.

As of 31 December 2024 and 31 December 2023, the movement of loans and bonds are as follows:

	Borrowings and Bonds issued
Opening balance as of 1 January 2024	47,188,724
Additions	43,901,469
Payments	(21,618,112)
Change in interest accruals	1,114,586
Inflation impact	(17,518,077)
Closing balance as of 31 December 2024	<u>53,068,590</u>
	Borrowings and Bonds issued
Opening balance as of 1 January 2023	44,382,820
Additions	52,467,628
Payments	(29,817,699)
Change in interest accruals	3,245,171
Inflation impact	(23,089,196)
Closing balance as of 31 December 2023	<u>47,188,724</u>

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NOTE 26 - FINANCIAL INSTRUMENTS (Continued)

26.1 Financial Liabilities (Continued)

As of 31 December 2024 and 31 December 2023, details of short and long term financial borrowings in terms of interest and currencies are as follows:

Currency	Weighted average effective interest rate	31 December 2024	
		Current	Non-current
TL		8,608,483	9,352,392
Overnight	52.00%	540,000	-
Fixed rate	49.05%	6,163,846	888,196
TLREF indexed	TLREF + 1.00%-3.50%	1,904,637	8,464,196
		<u>8,608,483</u>	<u>9,352,392</u>

Currency	Weighted average effective interest rate	31 December 2023	
		Current	Non-current
TL		13,333,130	3,376,002
Overnight	48.30%	206,462	-
Fixed rate	44.97%	10,688,368	1,919,402
TLREF indexed	TLREF + 1.70%-15.14%	2,438,300	1,456,600
		<u>13,333,130</u>	<u>3,376,002</u>

As of 31 December 2024 and 31 December 2023, details of bonds issued are as follows:

Currency	Weighted average effective interest rate	31 December 2024	
		Current	Non-current
TL		20,982,749	14,124,966
Fixed rate	44.73%	19,622,341	-
TLREF indexed	TLREF+1.00%-16.00%	1,360,408	14,124,966
		<u>20,982,749</u>	<u>14,124,966</u>

Currency	Weighted average effective interest rate	31 December 2023	
		Current	Non-current
TL		15,367,242	15,112,350
Fixed rate	41.42%	12,023,129	15,112,350
TLREF indexed	TLREF+16.00%	3,344,113	-
		<u>15,367,242</u>	<u>15,112,350</u>

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NOTE 26 - FINANCIAL INSTRUMENTS (Continued)

26.1 Financial Liabilities (Continued)

The fair values of the financial liabilities with fixed interests are presented by calculating their discounted cash flows using the market interest rate effective at the reporting date. The fair value of financial liabilities with variable interest rates are considered to be equivalent to the carrying amount due to the expectation that the floating interest rate will change accordingly with the market interest rates. Fair values of the borrowings are higher than their carrying amounts amounting to TL 211,770 as of 31 December 2024 (31 December 2023: TL 997,436 higher).

As of 31 December 2024 and 31 December 2023, Group has fulfilled its financial debt covenants arising from its borrowings.

As of 31 December 2024 and 31 December 2023, details of lease liabilities are as follows:

	31 December 2024	31 December 2023
Short-term portion of long term lease liabilities		
Buildings	56,751	91,590
Vehicles	268,400	328,899
	<u>325,151</u>	<u>420,489</u>

	31 December 2024	31 December 2023
Long-term lease liabilities		
Buildings	162,827	279,497
Vehicles	394,500	263,330
	<u>557,327</u>	<u>542,827</u>

The lease liabilities are repayable as follows:

	31 December 2024	31 December 2023
To be paid within 1 year	325,151	420,489
To be paid between 1-2 years	283,626	322,564
To be paid between 2-3 years	206,761	98,677
To be paid between 3-4 years	39,607	75,093
To be paid between 4-5 years	4,659	35,422
To be paid after 5 years and over	22,674	11,071
	<u>882,478</u>	<u>963,316</u>

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NOTE 26 - FINANCIAL INSTRUMENTS (Continued)

26.1 Financial Liabilities (Continued)

As of 31 December 2024 and 31 December 2023, the movement of lease liabilities is as follows:

	Buildings	Vehicles	Total
Opening balance as of 1 January 2024	371,087	592,229	963,316
Additions	21,485	576,957	598,442
Interest expense	79,495	238,623	318,118
Variable lease payment adjustments and changes in lease conditions	31,453	-	31,453
Payments	(175,414)	(525,515)	(700,929)
Inflation impact	(108,528)	(219,394)	(327,922)
Closing balance as of 31 December 2024	219,578	662,900	882,478
	Buildings	Vehicles	Total
Opening balance as of 1 January 2023	222,424	821,240	1,043,664
Additions	334,034	366,322	700,356
Interest expense	92,045	223,058	315,103
Variable lease payment adjustments and changes in lease conditions	64,273	(1,243)	63,030
Payments	(196,617)	(467,833)	(664,450)
Inflation impact	(145,072)	(349,315)	(494,387)
Closing balance as of 31 December 2023	371,087	592,229	963,316

26.2 Other Financial Liabilities

	31 December 2024	31 December 2023
Other current financial liabilities	165,390	202,019
Other non-current financial liabilities	696,231	1,110,896
	861,621	1,312,915

The other financial liabilities are repayable as follows:

	31 December 2024	31 December 2023
To be paid within 1 year	165,390	202,019
To be paid between 1-2 years	175,540	210,855
To be paid between 2-3 years	170,329	199,289
To be paid between 3-4 years	155,229	212,295
To be paid between 4-5 years	120,586	204,175
To be paid after 5 years and over	74,547	284,282
	861,621	1,312,915

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NOTE 26 - FINANCIAL INSTRUMENTS (Continued)

26.2 Other Financial Liabilities (Continued)

As of 31 December 2024 and 31 December 2023, details of short and long term other financial liabilities in terms of currencies are as follows:

Currency	Weighted average effective interest rate	31 December 2024	
		Current	Non-current
EUR	4.70%	165,390	696,231
		165,390	696,231
Currency	Weighted average effective interest rate	31 December 2023	
		Current	Non-current
EUR	4.70%	202,019	1,110,896
		202,019	1,110,896

After the acquisition of distribution regions, payment obligations of TEDAŞ denominated in EUR, which are in scope of loan agreements with European Investment Bank and World Bank have been transferred to the Group. Other financial liabilities are composed of EUR payment obligations of distribution companies to TEDAŞ in this scope.

As of 31 December 2024 and 31 December 2023, the movement of other financial liabilities is as follows:

	Other Financial Liabilities
Opening balance as of 1 January 2024	1,312,915
Additions	23,924
Foreign exchange movements	(78,714)
Inflation impact	(396,504)
Closing balance as of 31 December 2024	861,621

	Other Financial Liabilities
Opening balance as of 1 January 2023	1,407,816
Payment	(301,460)
Foreign exchange movements	887,713
Inflation impact	(681,154)
Closing balance as of 31 December 2023	1,312,915

Net debt position of the Group as of 31 December 2024 and 31 December 2023 are disclosed in Note 28.1.

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NOTE 27 - DERIVATIVE INSTRUMENTS

The Group utilizes forward exchange contracts in order to mitigate foreign exchange rate risk arising from FIT cost, electricity purchases, unit price investments, equipment purchases to be used in energy efficiency and distributed energy solutions projects and foreign currency denominated other financial liabilities. The details and fair values of the agreements as of 31 December 2024 and 31 December 2023 are as follows:

	31 December 2024				
	Contract Amount (USD)	Contract Amount (EUR)	Contract Amount (TL) (*)	Assets	Liabilities
Forward exchanges	48,475	27,106	2,705,984	9,595	(364,449)
	<u>48,475</u>	<u>27,106</u>	<u>2,705,984</u>	<u>9,595</u>	<u>(364,449)</u>

	31 December 2023				
	Contract Amount (USD)	Contract Amount (EUR)	Contract Amount (TL) (*)	Assets	Liabilities
Forward exchanges	158,358	44,065	6,097,143	830,047	(65,235)
	<u>158,358</u>	<u>44,065</u>	<u>6,097,143</u>	<u>830,047</u>	<u>(65,235)</u>

(*) Contract amounts are presented in nominal values.

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NOTE 28 - FINANCIAL RISK MANAGEMENT OBJECTIVES AND POLICIES

28.1 Capital Risk Management

The Group's objectives when managing capital are to safeguard the Group's ability to continue as a going concern in order to provide returns for shareholders and benefits for other stakeholders and to maintain an optimal capital structure to reduce the cost of capital.

The capital structure of the Group consists of debt, cash and cash equivalents and equity attributable to equity holders of the parent, comprising issued capital and reserves.

The Group management considers the cost of capital and the risks associated with each class of capital. The management of the Group aims to balance its overall capital structure through new share issues, and by issue of new debt or the redemption of existing debt.

	31 December 2024	31 December 2023
Total borrowings (Note 26)	54,812,689	49,464,955
Less: cash and cash equivalents (Note 29)	(9,487,867)	(6,498,842)
Less: derivative instruments (Note 27)	354,854	(764,812)
Net debt	45,679,676	42,201,301
Total equity	74,456,028	83,414,066
Total capital	120,135,704	125,615,367
Net debt / Total capital ratio (%)	38	34

28.2 Financial Risk Factors

The Group's activities expose it to a variety of financial risks: market risk, credit risk and liquidity risk. The Group's overall risk management programme focuses on the unpredictability of financial markets and seeks to minimize potential adverse effects on the Group's financial performance.

Risk management is carried out by the finance department. The finance department identifies and evaluates financial risks in close co-operation with the Group's operating units.

28.2.1 Credit risk management

Credit risk refers to the risk that counterparty will default on its contractual obligations resulting in a financial loss to the Group. The Group's credit risks mainly arise from trade receivables. The Group manages this risk by the guarantees received from customers. Trade receivables, are evaluated based on the Group's policies and procedures and as a result presented net of doubtful provision in the consolidated financial statements. In accordance with the requirements of TFRS 9 introducing a new impairment model based on expected credit losses, the Group has modified impairment calculation method for trade receivables. The Group recognizes the impairment of trade receivables, weighting the lifetime expected credit losses by default (Probability of Default) for all trade receivables excluding distribution segment on each customer basis and including non-overdue receivables.

Trade receivables consist of a large number of customers, spread across diverse industries within several different provinces. Credit risk of the financial instruments is as the follows:



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NOTE 28 - FINANCIAL RISK MANAGEMENT OBJECTIVES AND POLICIES (Continued)

28.2 Financial Risk Factors (Continued)

28.2.1 Credit risk management (continued)

Credit risk exposure based on financial instrument categories

	Receivables						Financial assets excluding cash	Derivatives
	Trade receivables		Other receivables		Bank deposits	Financial assets excluding cash		
	Related party	Other	Current	Non-current				
31 December 2024								
Maximum net credit risk as of the balance sheet date (*)	224,891	25,850,044	6,222,320	6,260,848	9,487,867	43,189,075	9,595	
The part of maximum risk under guarantee	-	21,141,225	-	-	-	-	-	
A. Net book value of financial assets that are neither past due nor impaired (**)	224,891	21,038,166	6,222,320	6,260,848	9,487,867	43,189,075	9,595	
B. Net book value of financial assets that are due but not impaired (**)	-	4,811,878	-	-	-	-	-	
C. Net book value of impaired assets	-	-	-	-	-	-	-	
- Past due (gross book value)	-	6,585,135	194,133	-	-	-	-	
- Impairment (-)	-	(6,585,135)	(194,133)	-	-	-	-	
- Not due (gross book value)	-	569,214	-	-	-	-	-	
- Impairment (-)	-	(569,214)	-	-	-	-	-	
D. Credit risk factors off balance sheet	-	-	-	-	-	-	-	

Maturity of Expected Credit Loss

	Not due	Overdue Up to 1 months	Overdue 1-3 months	Overdue more than 3 months	Total
31 December 2024					
Balance at period end	14,119,775	1,797,701	741,508	1,938,159	18,597,143
Credit loss rate (%)	2%	8%	17%	62%	9%
Expected credit losses	(230,852)	(141,125)	(122,518)	(1,210,881)	(1,705,376)

(*) The factors such as collaterals received, that increase the credit reliability, have not been taken into consideration in determination of the amount.

(**) Amounts excluding the distribution segment are subject to impairment within the scope of TFRS 9. The maturity of expected credit losses except distribution segment is given in the above table. Unlawful and illegal usage receivables amounting to TL 494,797 and general lighting receivables amounting to TL 980,254, which are not insured within the amount related to the distribution segment are guaranteed by the Ministry of Energy, Ministry of Finance and Iller Bank in line with the Electricity Market Law, Electricity Market Tariff Regulation and other relevant regulatory arrangements.

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NOTE 28 - FINANCIAL RISK MANAGEMENT OBJECTIVES AND POLICIES (Continued)

28.2 Financial Risk Factors (Continued)

28.2.1 Credit risk management (continued)

Credit risk exposure based on financial instrument categories (Continued)

	Receivables						Financial assets excluding cash	Derivatives
	Trade receivables		Other receivables		Bank deposits	Financial assets excluding cash		
	Related party	Other	Current	Non-current				
31 December 2023								
Maximum net credit risk as of the balance sheet date (*)	262,085	23,332,391	7,912,888	3,407,904	6,498,842	45,852,109	830,047	
The part of maximum risk under guarantee	-	22,796,308	-	-	-	-	-	
A. Net book value of financial assets that are neither past due nor impaired (**)	262,085	17,657,716	7,912,888	3,407,904	6,498,842	45,852,109	830,047	
B. Net book value of financial assets that are due but not impaired (**)	-	5,694,675	-	-	-	-	-	
C. Net book value of impaired assets	-	-	-	-	-	-	-	
- Past due (gross book value)	-	7,602,889	280,287	-	-	-	-	
- Impairment (-)	-	(7,602,889)	(280,287)	-	-	-	-	
- Not due (gross book value)	-	643,502	-	-	-	-	-	
- Impairment (-)	-	(643,502)	-	-	-	-	-	
D. Credit risk factors off balance sheet	-	-	-	-	-	-	-	

Maturity of Expected Credit Loss

	Not due	Overdue Up to 1 months	Overdue 1-3 months	Overdue more than 3 months	Total
31 December 2023					
Balance at period end	16,496,385	1,662,973	968,715	2,862,527	21,990,600
Credit loss rate (%)	2%	9%	24%	58%	10%
Expected credit losses	(275,291)	(142,405)	(228,136)	(1,656,242)	(2,302,074)

(*) The factors such as collaterals received, that increase the credit reliability, have not been taken into consideration in determination of the amount.

(**) Amounts excluding the distribution segment are subject to impairment within the scope of TFRS 9. The maturity of expected credit losses is given in the above table. Unlawful and illegal usage receivables amounting to TL 564,685 and general lighting receivables amounting to TL 1,202,314, which are not insured within the amount related to the distribution segment are guaranteed by the Ministry of Energy, Ministry of Finance and Iller Bank in line with the Electricity Market Law, Electricity Market Tariff Regulation and other relevant regulatory arrangements.

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NOTE 28 - FINANCIAL RISK MANAGEMENT OBJECTIVES AND POLICIES (Continued)

28.2 Financial Risk Factors (Continued)

28.2.2 Liquidity risk management

The Group aims to maintain an appropriate liquidity risk management framework for the Group's short and long-term funding and liquidity management requirements.

The following tables detail the Group's remaining contractual maturity for its non-derivative financial liabilities. The tables have been drawn up based on the undiscounted cash flows of financial liabilities based on the earliest date on which the Group can be required to pay. The table includes both interest and principal cash flows.

The maturities of the financial liabilities determined with respect to the contracts including the expected interest payments as of 31 December 2024 and 31 December 2023 are as follows:

31 December 2024							
Maturity analysis of non-derivative financial liabilities	Carrying value	Total cash outflow according to contract (I+II+III+IV+V)					
		Payable on demand (I)	Less than 3 months (II)	3-12 months (III)	1-5 years (IV)	More than 5 years (V)	
Non-derivative financial liabilities							
Financial liabilities	53,951,068	99,884,488	-	12,715,460	42,514,544	43,384,110	1,270,374
Trade payables	19,849,637	19,849,637	-	19,849,637	-	-	-
Other payables	13,114,140	13,114,140	12,115,370	998,770	-	-	-
Other financial liabilities	861,621	861,621	-	33,846	131,544	621,684	74,547
Total liabilities	87,776,466	133,709,886	12,115,370	33,597,713	42,646,088	44,005,794	1,344,921
31 December 2023							
Maturity analysis of non-derivative financial liabilities	Carrying value	Total cash outflow according to contract (I+II+III+IV+V)					
		Payable on demand (I)	Less than 3 months (II)	3-12 months (III)	1-5 years (IV)	More than 5 years (V)	
Non-derivative financial liabilities							
Financial liabilities	48,152,040	93,996,201	-	18,114,481	23,445,408	52,436,312	-
Trade payables	23,402,737	23,402,738	-	23,402,738	-	-	-
Other payables	12,980,145	12,980,145	11,690,386	1,289,759	-	-	-
Other financial liabilities	1,312,915	1,312,916	-	39,715	162,303	826,615	284,283
Total liabilities	85,847,837	131,692,000	11,690,386	42,846,693	23,607,711	53,262,927	284,283

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NOTE 28 - FINANCIAL RISK MANAGEMENT OBJECTIVES AND POLICIES (Continued)

28.2 Financial Risk Factors (Continued)

28.2.3 Market risk management

28.2.3.1 Foreign currency risk management

The Group undertakes certain transactions denominated in foreign currencies. Hence, exposures to exchange rate fluctuations arise. Exchange rate exposures are managed by adjusting the unit price / tariff of the energy sold.

The carrying amount of the Group's foreign currency denominated monetary assets and monetary liabilities at the reporting date is disclosed below.

	31 December 2024		
	Total TL equivalent	USD TL equivalent	EUR TL equivalent
Cash and cash equivalents	553,617	191,325	362,292
Trade receivables	205,155	205,155	-
Total assets	758,772	396,480	362,292
Other financial liabilities	(861,621)	-	(861,621)
Trade payables	(1,593,330)	(1,505,151)	(88,179)
Total liabilities	(2,454,951)	(1,505,151)	(949,800)
Net foreign currency asset position of off-balance sheet derivative	1,289,974	294,203	995,771
Net foreign currency asset / (liability) position	(406,205)	(814,468)	408,263
Cash flow hedging (*)	1,416,010	1,416,010	-

(*) Cash flow hedging includes forward exchange contracts in order to mitigate foreign exchange rate risk arising from FIT cost and USD denominated energy purchases which are probable in the future. Since it will arise with the realization of highly probable FIT cost and USD denominated energy purchases in the future, relevant trade payables amounts are not included in this table. The total of those forward exchange contracts amounting to TL 1,416,010 is included at cash flow hedging in the foreign currency position table.

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NOTE 28 - FINANCIAL RISK MANAGEMENT OBJECTIVES AND POLICIES (Continued)

28.2 Financial Risk Factors (Continued)

28.2.3 Market risk management (continued)

28.2.3.1 Foreign currency risk management (continued)

	31 December 2023 (*)		
	Total	USD	EUR
	TL equivalent	TL equivalent	TL equivalent
Cash and cash equivalents	2,642,141	2,013,259	628,882
Trade receivables	132,735	132,735	-
Total assets	2,774,876	2,145,994	628,882
Other financial liabilities	(1,312,915)	-	(1,312,915)
Trade payables	(3,425,506)	(3,286,048)	(139,458)
Total liabilities	(4,738,421)	(3,286,048)	(1,452,373)
Net foreign currency asset position of off-balance sheet derivative	4,618,306	2,770,271	1,848,035
Net foreign currency asset / (liability) position	2,654,761	1,630,217	1,024,544
Cash flow hedging (**)	4,184,674	3,960,341	224,333

(*) All the amounts are expressed in thousands of TL in terms of purchasing power of the TL at 31 December 2024.

(**) Cash flow hedging includes forward exchange contracts in order to mitigate foreign exchange rate risk arising from FIT cost and USD denominated energy purchases which are probable in the future. Since it will arise with the realization of highly probable FIT cost and USD denominated energy purchases in the future, relevant trade payables amounts are not included in this table. The total of those forward exchange contracts amounting to TL 4,184,674 is included at cash flow hedging in the foreign currency position table.

The Group is exposed to foreign exchange risk arising from various currency exposures, primarily with respect to the USD and EUR.

The following table details the Group's sensitivity to a 10% increase and decrease in the TL against the relevant foreign currencies. 10% is the sensitivity rate used when reporting foreign currency risk internally to key management personnel and represents management's assessment of the possible change in foreign currency rates. The sensitivity analysis includes only outstanding foreign currency denominated monetary items and adjusts their translation at the period end for a 10% change in foreign currency rates. A positive number indicates an increase in profit or loss before taxation on income where the TL strengthens against the relevant currency.

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NOTE 28 - FINANCIAL RISK MANAGEMENT OBJECTIVES AND POLICIES (Continued)

28.2 Financial Risk Factors (Continued)

28.2.3 Market risk management (continued)

28.2.3.1 Foreign currency risk management (continued)

	1 January - 31 December 2024			
	Profit / Loss		Other Comprehensive Income and Expense	
	Appreciation of foreign currency	Depreciation of foreign currency	Appreciation of foreign currency	Depreciation of foreign currency
Change in USD against TL by 10%				
USD net assets / liabilities	(110,867)	110,867	-	-
Hedged items (-)	29,420	(29,420)	141,601	(141,601)
USD net effect	(81,447)	81,447	141,601	(141,601)
Change in EUR against TL by 10%				
EUR net assets / liabilities	(58,751)	58,751	-	-
Hedged items (-)	99,577	(99,577)	-	-
EUR net effect	40,826	(40,826)	-	-
	1 January - 31 December 2023 (*)			
	Profit / Loss		Other Comprehensive Income and Expense	
	Appreciation of foreign currency	Depreciation of foreign currency	Appreciation of foreign currency	Depreciation of foreign currency
Change in USD against TL by 10%				
USD net assets / liabilities	(114,005)	114,005	-	-
Hedged items (-)	277,027	(277,027)	396,034	(396,034)
USD net effect	163,022	(163,022)	396,034	(396,034)
Change in EUR against TL by 10%				
EUR net assets / liabilities	(82,349)	82,349	-	-
Hedged items (-)	184,804	(184,804)	22,433	(22,433)
EUR net effect	102,454	(102,454)	22,433	(22,433)

(*) All the amounts are expressed in thousands of TL in terms of purchasing power of the TL at 31 December 2024.

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NOTE 28 - FINANCIAL RISK MANAGEMENT OBJECTIVES AND POLICIES (Continued)

28.2 Financial Risk Factors (Continued)

28.2.3 Market risk management (continued)

28.2.3.2 Interest rate risk management

As of 31 December 2024, the Group has TLREF indexed loans and bonds with floating interest rate risk. Interest rate risk arising from those loans are managed through perpetually monitoring and analyzing market interest rates and carrying out sensitivity analysis for interest rate changes in order to monitor possible cost changes within the scope of risk management activities.

Fair value of financial instruments

The fair value of other financial assets and financial liabilities are determined in accordance with generally accepted pricing models.

Categories of financial instruments and fair values

Fair value is the amount at which a financial instrument could be exchanged in a current transaction between willing parties, other than in a forced sale or liquidation, and is best evidenced by a quoted market price, if one exists.

The carrying amounts of foreign currency denominated monetary assets which are translated at year end exchange rates are considered to approximate their fair values.

The carrying values of cash and cash equivalents are estimated to be at their fair values since they have short term maturities and have little impairment risk.

The carrying value of trade receivables and other receivables which are both discounted and provided provision for doubtful receivables are estimated to be at their fair values.

The fair values of the financial liabilities with fixed interests are presented by calculating their discounted cash flows using the market interest rate effective at the reporting date. The fair value of financial liabilities with variable interest rates are considered to be equivalent to the carrying amount due to the expectation that the floating interest rate will change accordingly with the market interest rates. Fair values of the borrowings are lower than their carrying amounts amounting to TL 211,770 as of 31 December 2024 (31 December 2023: TL 997,436 higher).

Discounted values of trade payables and other payables are assumed to approximate their respective carrying values.

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NOTE 28 - FINANCIAL RISK MANAGEMENT OBJECTIVES AND POLICIES (Continued)

28.2 Financial Risk Factors (Continued)

28.2.3 Market risk management (continued)

28.2.3.2 Interest rate risk management (continued)

Assets and liabilities subject to valuation and fair value of financial instruments

Fair value is the amount at which a financial instrument could be exchanged in a current transaction between willing parties, other than in a forced sale or liquidation, and is best evidenced by a quoted market price, if one exists.

The classification of the Group's financial assets and liabilities at fair value is as follows:

- Quoted prices (unadjusted) in active markets for identical assets or liabilities (Level 1).
- Inputs other than quoted prices included within level 1 that are observable for the asset or liability, either directly (that is, as prices) or indirectly (that is, derived from prices) (Level 2).
- Inputs for the asset or liability that are not based on observable market data (that is, unobservable inputs) (Level 3).

In the consolidated balance sheet, derivative financial instrument is recognized at fair value. The fair value of derivative financial instrument is determined by using valuation technique, which can be regarded as Level 2.

The following table gives information about how the fair values of financial instruments subject to valuation are determined.

Financial assets / (Financial liabilities)	Fair value / revalued amount		Fair value hierarchy
	31 December 2024	31 December 2023	
Derivative financial instruments	(354,854)	764,812	Level 2

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NOTE 29 - EXPLANATORY NOTES TO THE STATEMENT OF CASH FLOWS

	31 December 2024	31 December 2023
Cash at banks	9,487,867	6,498,842
<i>Demand deposits</i>	3,659,870	2,350,206
<i>Time deposits</i>	5,827,997	4,148,636
	<u>9,487,867</u>	<u>6,498,842</u>

As at 31 December 2024, TL 1,042,123 of the Group's demand deposits are blocked at different banks (31 December 2023: TL 976,636). These blocked deposits are related to the collections made through bank branches which are made available for use by banks 1 or 2 days after the collection depending on the agreements with related banks and related to the conditions of some loan agreements.

As at 31 December 2024 time deposits consist of short term TL 5,673,424, USD 3,395 and EUR 950 balances (31 December 2023: TL 2,816,182 and USD 31,350) with maturities between 2 - 21 days (31 December 2023: 4 - 33 days). Foreign currency term deposits are expressed in their nominal values. The weighted average effective interest rates of TL, USD and EUR time deposits are 49.70, %, 1.50% and 1.00% respectively as at 31 December 2024 (31 December 2023: weighted average effective interest rate 43.29% and 3.00%, respectively).

Details of "Other adjustments to reconcile profit / (loss)" that presented on cash flow statement as follows:

	1 January - 31 December 2024	1 January - 31 December 2023
Adjustments related to interest income from tariff receivables (Note 22)	(4,501,676)	(1,815,713)
Adjustments related to financial income from service concession arrangements (Note 10, 19)	(19,750,220)	(21,174,859)
	<u>(24,251,896)</u>	<u>(22,990,572)</u>

Details of "Other cash in-flows generated from operating activities" that presented on cash flow statement as follows:

	1 January - 31 December 2024	1 January - 31 December 2023
Net collections from financial assets related to service concession arrangements	21,581,589	18,181,003
<i>Capital expenditures reimbursements (Note 10)</i>	12,996,100	12,265,746
<i>WACC reimbursements (Note 10)</i>	7,557,674	7,346,397
<i>Tariff corrections (Note 10)</i>	1,027,815	(1,431,140)
Collections from doubtful trade receivable (Note 6)	922,376	571,754
	<u>22,503,965</u>	<u>18,752,757</u>

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NOTE 29 - EXPLANATORY NOTES TO THE STATEMENT OF CASH FLOWS (Continued)

Details of "Other cash-out flows from investing activities" that presented on cash flow statement as follows:

	1 January - 31 December 2024	1 January - 31 December 2023
Capital expenditures related to service concession arrangements	(16,660,402)	(21,318,902)
	<u>(16,660,402)</u>	<u>(21,318,902)</u>

NOTE 30 – FEES FOR SERVICES RECEIVED FROM INDEPENDENT AUDITOR / INDEPENDENT AUDIT COMPANY

The Group's explanation regarding the fees for the services rendered by the independent audit firm, which is prepared based on the POA's Board Decision published in the Official Gazette on 30 March 2021, and the preparation principles of which are based on the letter of POA dated 19 August 2021 are as follows:

	1 January - 31 December 2024	1 January - 31 December 2023
Audit services	5,089	3,706
Other assurance services	91	74
	<u>5,180</u>	<u>3,780</u>

Fees are determined by including all subsidiaries' statutory audit and other related service fees.

NOTE 31 - EVENTS AFTER THE REPORTING DATE

- The Group has obtained a loan on 31 January 2025, amounting to TL 750,000,000 (full digit) with 1,095 days term with interest payments every 3 months and redemption date of 31 January 2028.
- The Group has made a bond issuance on 10 February 2025, amounting to TL 4,800,000,000 (full digit), with 730 days term, coupon payments every 3 months, redemption date of 10 February 2027, and with TRSENSA22711 ISIN code.
- The Group has made a bond issuance on 11 February 2025, amounting to TL 700,000,000 (full digit), with 729 days term, coupon payments every 3 months, redemption date of 10 February 2027, and with TRSENSA22729 ISIN code.
- EMRA made amendments to the Communiqué on the Regulation of the Last Resort Supply Tariff (LRST) through a Board Decision on 16 November 2024. Effective 1 February 2025, the LRST limits have been updated as follows: 5,000 kWh/year for the residential consumer group, 100 million kWh/year for temporary shelter centers, water supply facilities under village legal entities, and other consumers within the residential group as well as for agricultural activities, 15,000 kWh/year for other consumer groups. With the Board Decision published in the Official Gazette dated 26 December 2024, it has been resolved that the ratio determined by the Board, used in the calculation of the Last Resort Supply Tariff, will be applied as 1.05 for the residential consumer group and 1.0938 for other consumer groups, effective as of 1 January 2025.

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NOTE 31 - EVENTS AFTER THE REPORTING DATE (Continued)

- Electricity Markets Consumer Services Regulation was published in the Official Gazette dated 14 January 2025. The content of the registration includes that no deposits will be received from residential consumers who regularly pay their bills for the last 24 months and with no change in supplier and consumer group in case of transfer or if a new Retail Sales Agreement is offered in a different location.

