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DENİZCİLER DÖKÜMCÜLÜK A.Ş. SUSTAINABILITY REPORT

Reporting Period: 1 January 2024 – 31 December 2024

Publication Date: December 2025

Production Scope: Manufacturing of gray iron and ductile iron cast products through the re-melting and recovery of scrap iron and steel and scrap iron–steel turnings (including water and gas pipe fittings, clamps, automotive and tractor parts, various machinery spare parts, gearbox housings, etc.).

Scope: 24.51.12.50.00 and 24.51.13.50.00 (Production of ductile and gray cast iron parts and patterns)

This report is structured in line with Environmental, Labor & Human Rights, Ethics, and Sustainable Procurement processes, and has been prepared with the inclusion of metric tables, targets, policy annexes, and evidence checklists.

1) MESSAGE FROM TOP MANAGEMENT

General Manager: Cenk Denizci

Executive Responsible for Sustainability: Erhan Özkan

Denizciler Dökümcülük, with its contemporary and modern production technologies, has adopted a sustainable quality approach and a philosophy of continuous improvement as an integral part of its corporate culture. Through a process-based management approach, the Company identifies risks and opportunities in line with customer needs, with the aim of maintaining customer satisfaction at the highest possible level while ensuring the most rational use of resources.

Our Company has embraced environmentally responsible, nature-respecting, and sustainable foundry principles. In fulfilling our compliance obligations, we are committed to using natural resources and all forms of energy in the most efficient and economical manner. We undertake to keep environmental risks at the lowest reasonably achievable level, promote waste reduction and reuse, and fully comply with all applicable environmental legislation and regulatory requirements.

Through our Occupational Health and Safety practices, we strive to provide safe and healthy working environments where our employees—our most valuable asset—feel secure. Denizciler Dökümcülük fully complies with applicable legal requirements, standards, and internal rules, eliminates hazards where possible, minimizes risks, and reinforces its commitment through continuous training at all organizational levels.

Our ultimate objective is to leave a livable and sustainable world for future generations.

2) COMPANY PROFILE AND PRODUCTS

Year of Establishment: 1978

Number of Employees: 252

Production Capacity: 24,496 tons/year of molten metal

Main Products:

Water and gas pipe fittings, clamps, automotive parts, tractor and various machinery spare parts, gearbox housings, and similar cast iron components.

Certifications:

ISO 9001 – Quality Management System

ISO 14001 – Environmental Management System

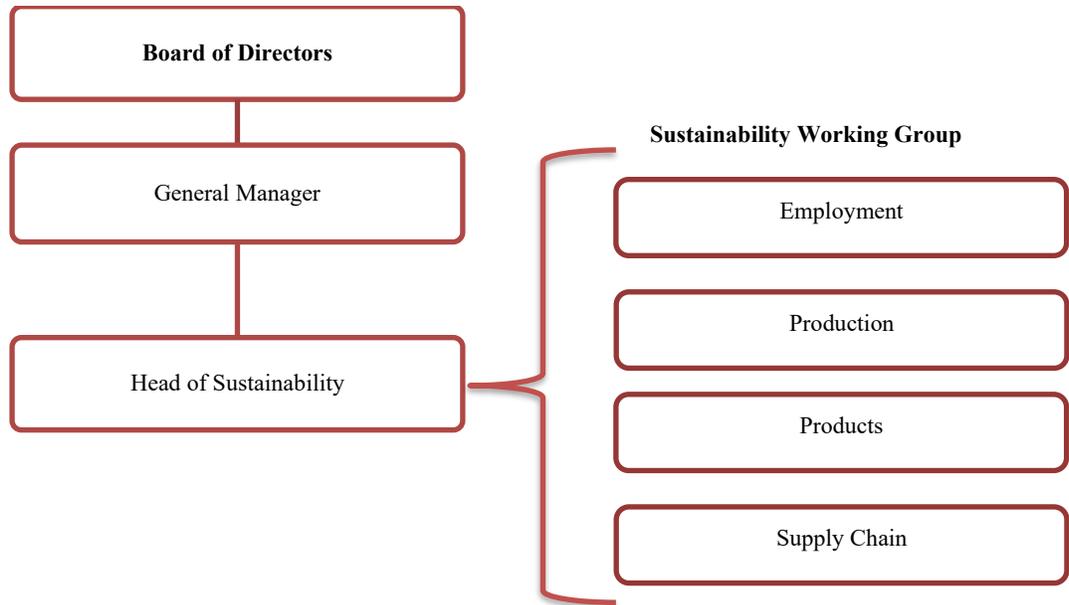
ISO 45001 – Occupational Health and Safety Management System

Denizciler Dökümcülük A.Ş. is a well-established foundry company with decades of experience in the production of grey and ductile iron components. The Company serves a wide range of industries, including infrastructure, automotive, agriculture, and machinery manufacturing, by delivering products that meet high quality, durability, and regulatory standards.

Its production processes are supported by certified management systems, ensuring consistent quality performance, effective environmental management, and a strong occupational health and safety culture across all operations.

3) GOVERNANCE, MATERIALITY AND RISK

3.1 Our Team



Sustainability Topics		
* Energy Management	* Occupational Health and Safety	* Business Ethics (Compliance and Anti-Corruption)
* Emissions Management	* Employment	* Sustainability Growth
* Water Management	* Equal Opportunity and Diversity	* Modernization and Innovation
* Waste Management	* Human Rights	
* Raw and Other Materials Management	* Training and Development	

Sustainability management at Denizciler Dökümcülük A.Ş. is carried out under the supervision of the Board of Directors. The coordination of sustainability-related activities is ensured by the Sustainability Officer, who reports directly to the General Manager.

Key performance indicators related to Environment, Occupational Health and Safety, Human Resources, and Ethics are monitored by relevant departments, reviewed on an annual basis, and regularly reported to top management. This governance structure ensures transparency, accountability, and continuous improvement in sustainability performance.

3.1.1 Material Sustainability

Based on stakeholder expectations, operational priorities, and risk assessments, Denizciler Dökümcülük A.Ş. has identified the following sustainability topics as material:

- Energy Management
- Emissions Management
- Water Management
- Waste Management and Circularity
- Occupational Health and Safety
- Employees and Human Capital
- Human Rights
- Equal Opportunity and Diversity
- Business Ethics and Anti-Corruption
- Sustainable Growth
- Modernization and Innovation
- Raw Materials and Other Materials Management
- Training and Development

These topics form the foundation of the Company’s sustainability strategy and are integrated into business planning, operational controls, and performance monitoring processes.

Material Sustainability Topics

The Company identifies and evaluates risks and opportunities related to internal and external factors, taking into account its strategic objectives as well as the expectations and needs of relevant stakeholders.

Risk and opportunity assessment methodologies, responsibilities, and evaluation criteria are defined within the Risk Management Procedure. Risk assessment tables prepared by process owners are reviewed by top management during annual Management Review meetings and updated where necessary to ensure continuous improvement.

3.2 Our Products

“Our casting products are mainly used in the machinery industry, water and hydraulic pumps, the construction sector, and agricultural machinery.”





3.3 Our Processes

Denizciler Dökümcülük Sanayi ve Ticaret A.Ş. has specified the processes required for its Integrated Management Systems and their applications in a process flowchart, and summary visuals of these processes are given below.





3.4 Risk

The management identifies internal and external issues, risks, and opportunities related to its aims and objectives, taking into account the requests and needs of relevant stakeholders. It then undertakes activities to develop opportunities and prevent or mitigate risks. All these activities are reviewed to achieve continuous improvement. The responsibilities for risks and opportunities within the quality management system, and all assessment methods, are specified in the Risk Management Procedure. According to the procedure, risk/opportunity tables prepared by process owners are submitted to senior management and maintained by the Quality Assurance Engineer. All risks are reviewed annually at the Annual Review meetings and updated if necessary.

4) TARGETS AND MILESTONES (2026–2028)

The sustainability targets defined by Denizciler Dökümcülük A.Ş. have been established by taking into account environmental and social risk analyses, operational priorities, and applicable legal requirements. These targets aim to ensure measurable and continuous improvement across key sustainability performance areas.

Targets are monitored regularly, and progress is reviewed during management review meetings. Where necessary, targets are updated in line with performance trends and strategic priorities.

No	Topic	Indicator	Base Year	2026 Target	2027 Target	2028 Target	Responsible
H1	Energy Efficiency	kWh	2024: 18.808.806	-%5	-%8	-%12	Environmental Engineer.
H2	CO ₂ Intensity	Tons CO ₂ eq	2024: 17.835	17.000	16.500	16.000	Environmental Engineer.
H3	Sand Regeneration	Reg. Ratio %	2024: 1200	+5 puan	+8 puan	+12 puan	Production Units
H4	Hazardous Waste	metric tons	2024: 25,84	-%10	-%20	-%30	Environmental Engineer.
H5	LTIFR	Accident Frequency with Lost Time	2024: 27	-%20	-%35	-%50	OHS Department
H6	Female Employment	%	2024: 11,78	15	18	20	Human Resources
H7	Supplier Assessment	% of Scored Suppliers	2024: 35	25	35	45	Purchasing

* The defined objectives were established taking into account environmental and social risk analyses and legal requirements.

5) POLICIES AND PROCEDURES

5.1. Environmental Policy:

Denizciler Dökümcülük A.Ş. commits to environmentally responsible, nature-respecting, and sustainable foundry practices. The Company aims to achieve high environmental performance and continuous improvement by complying with applicable environmental legislation and implementing internationally recognized environmental management standards.

Key principles include efficient use of natural resources and energy, prevention of pollution, reduction of environmental risks, waste reduction at source, recycling and recovery, legal compliance monitoring, environmental awareness training, emergency preparedness, and continuous environmental performance monitoring.

- Ensuring the most efficient and economical use of natural resources and all types of energy sources, and reducing the consumption of natural resources through water management and energy management programs.
- Reducing potential environmental risks arising during casting operations to the lowest reasonably achievable level, identifying environmental issues, and implementing the necessary preventive measures.
- Preventing waste at the source and/or ensuring source separation, recycling, and reuse in order to reduce and/or enable the reuse of wastes that may arise from our activities, and maximizing the evaluation of recycling and reuse opportunities.
- Establishing legal compliance assessment processes and ensuring compliance with the environmental legislation in force in our country, as well as with the company's environmental policies and procedures.
- Providing Environmental Awareness training to all employees and contractors to ensure the protection of the environment, to enable them to understand the environmental impacts related to their work areas, and to help reduce potential impacts.
- Establishing decision-making mechanisms within the scope of environmental risk assessment studies to prevent the occurrence of environmental incidents and accidents in our areas of operation, and integrating corrective and preventive actions into emergency response plans.
- Implementing and monitoring rehabilitation and environmental integration activities, including restoration plans, in our areas of operation.
- Ensuring effectiveness by establishing continuous review, audit, and environmental monitoring programs within the scope of environmental management in our areas of operation.
- Communicating this policy to our employees, contractors, the public, relevant public authorities, suppliers, and customers.
- The management team and managers of Denizciler Dökümcülük A.Ş. are responsible for ensuring the implementation of this policy, maintaining the continuity of the environmental management system, and enhancing the company's reputation by improving our performance in these matters.
- All employees of Denizciler Dökümcülük A.Ş. are responsible for protecting the environment and for contributing to and improving the environmental management system in line with the principle of continuous improvement.

5.2. Occupational Health and Safety (OHS) Policy:

The Company is committed to providing safe and healthy working conditions for all employees and visitors. Occupational health and safety risks are systematically identified, assessed, and controlled through preventive measures, regular inspections, training programs, and emergency preparedness planning.

Denizciler Dökümcülük A.Ş. conducts all its activities with the awareness of ensuring the Health and Safety of its employees and all parties who may be affected by its operations. Our company recognizes that reliable operations and effective occupational health and safety performance, achieved through Occupational Health and Safety (OHS) practices, together form an integral whole for an efficient organization.

The prerequisite for quality and productivity is a working environment in which our employees feel safe. To achieve this, the company establishes, continuously improves, and sustains an Occupational Health and Safety management system. Our management is committed to creating the healthiest and safest possible workplace through continuous training, ongoing communication between managers and employees, and a principle of action rather than words.

In order to achieve our objectives within the scope of Occupational Health and Safety, including employees, suppliers, and visitors:

- We ensure full compliance with occupational health and safety legislation, other applicable requirements, and established occupational health and safety rules.
- We establish a working environment in which occupational health and safety risks are identified and defined.

- All departments continue their activities with due consideration of occupational health and safety principles.
- Employee training and awareness processes are monitored to create and maintain a safe working environment.
- Based on regular inspections, we continue corrective actions with the aim of continuous improvement of our operations.
- We take corrective and preventive measures to ensure preparedness for occupational health and safety–related accidents and incidents, and to implement the necessary actions when such situations arise.
- We aim to develop every employee as an occupational health and safety responsible and to carry out related improvement processes together with all employees.
- By valuing every employee, we strive to implement occupational health and safety measures and to continuously enhance training processes for ongoing improvement.

5.3. Human Rights and Diversity Policy:

Denizciler Dökümcülük A.Ş. adopts a people-centered, equitable, and inclusive approach. Child labor, forced labor, discrimination, and harassment are strictly prohibited. Equal opportunity, fair remuneration, and respect for diversity are fundamental principles.

Denizciler Dökümcülük’s Human Resources Policy adopts a participatory, equitable, value-creating human resources management approach that embraces continuous improvement and diversity. The purpose of this policy is to preserve the dynamic structure of the organization while fostering a corporate culture in which employees are happy, innovation-oriented, committed to sustainable success, and continuously learning together.

In everything we do and in every step we take, we prioritize a people-centered approach and ethical values, and we regard it as a priority to create a working environment that contributes to economic, social, and environmental sustainability.

Human Resources management is responsible for supporting the achievement of company objectives by creating a dynamic and development-oriented environment that enhances employee performance and integrates individual goals with corporate goals within an effective organizational structure. Human Resources practices are shaped with the aim of creating a motivated employee profile supported by training to encourage the generation of diverse ideas.

In recruitment processes, the objective is to identify the most suitable candidate through competency-based evaluations. In compliance with laws, regulations, and legal requirements, the company acts with a sense of social responsibility by not employing individuals under the age of 18.

The Human Resources management supports practices that promote social balance, such as increasing the representation and participation of women/men in occupations, professions, and sectors traditionally dominated by men/women; ensuring that female employees are represented in decision-making positions at middle and senior management levels; encouraging the return of female employees to work after childbirth; preventing potential career losses; and maintaining work–life balance.

A fair remuneration system is maintained that is aligned with competitive and sectoral conditions, sensitive to the principle of equality, and based on performance systems. In line with the principle of equal pay for work of equal value, all employee rights related to salary scales—established by considering performance results and various criteria—are protected. In accordance with working principles, care is taken not to exceed the working hours stipulated by legal regulations, and overtime compensation is paid in full compliance with applicable legislation.

Practices aimed at employee satisfaction are continuously reviewed and updated in line with legal regulations, focusing on enhancing employee motivation, maintaining work–life balance, improving interdepartmental communication, strengthening employee engagement, and supporting professional development.

5.4. Protection of Personal Data and Information Security Policy

The Company protects the confidentiality, integrity, and availability of personal and corporate data in compliance with the Personal Data Protection Law (KVKK). Information security risks are identified and mitigated through technical and organizational controls, training, audits, and business continuity planning.

Within the scope of the Information Security Management System (ISMS) and the Law on the Protection of Personal Data (KVKK) related to our company;

- To establish a risk management methodology for our company, customers, and suppliers by identifying information assets, determining risks, and implementing control measures in order to comply with the principles of confidentiality, integrity, and availability of information, which are the core requirements of the Information Security Management System.

- To protect the confidentiality of customer information and ensure compliance with applicable standards and legal regulations.
- To allocate the necessary resources and ensure continuity for the required hardware, software, training, and other controls in order to reduce information security risks.
- To provide awareness, training, and encouragement to ensure the participation of and compliance with the ISMS by all personnel and business partners, in line with the requirement for a holistic approach to information security.
- To control, monitor, review, and continuously align and improve the effectiveness of the ISMS through internal and external audits.
- To raise awareness by providing Information Security Management and KVKK training to all personnel.
- To ensure that KVKK-related personnel adopt a conscious approach to information security, fulfill the responsibilities within their scope of duties, and show the utmost diligence in complying with published policies, procedures, instructions, and announcements.

This constitutes our KVKK and ISMS Policy.

6) HSE (Health Safety & Environment)

6.1 Health

Scope: This guideline has been prepared to identify all factors that may affect employees' health and safety by taking into account workplace conditions, machinery and equipment, used raw materials, and hazards arising from human and organizational errors, to determine risks and opportunities, and to define the necessary measures to prevent the identified risks.

Periodic medical examinations are repeated at least once every five years for workplaces classified as low risk, at least once every three years for hazardous workplaces, at least once annually for very hazardous workplaces, and at least once every six months for employees belonging to groups requiring special policy considerations, such as child, young, and pregnant employees. Within the scope of the Regulation on Health and Safety Conditions in the Use of Work Equipment, the process is addressed and the required measurements are carried out in accordance with the document management procedure.

The prerequisite for quality and productivity is a working environment in which our employees feel safe. To achieve this, an Occupational Health and Safety management system is established, continuously improved, and sustained. Our management is committed to creating the healthiest and safest possible workplace through continuous training, ongoing communication between managers and employees, and a principle of action rather than words.

6.2 Training and Drills

Scope: This guideline covers the collection of data required to enable Denizciler Dökümcülük San. ve Tic. A.Ş. management to make prompt and accurate decisions during health-related emergencies, the preparation of action plans, the implementation of measures to protect life and property, and the organization of the activities of damage assessment, emergency response, and rescue teams.

In our facility, health-related emergency drills are conducted once a year. Participants in the drills are recorded in the drill participation list. Following each drill, drill reports are completed and submitted to the relevant departments.



Category 1: Direct Greenhouse Gas Emissions

Category 2: Indirect Greenhouse Gas Emissions from Purchased Energy

Category 3: Indirect Greenhouse Gas Emissions from Transportation and Logistics

Category 4: Indirect Emissions from Purchased Goods, Capital Goods, and Services

Category 5: Indirect Greenhouse Gas Emissions from the Use Phase and End-of-Life of Products

Category 6: Other Indirect Greenhouse Gas Emissions

Methodology: The carbon footprint calculation and reporting activities carried out within our organization have been conducted in accordance with the ISO 14064-1:2018 standard, taking into account the needs of the target users, and have been documented in the 2024 Corporate Carbon Footprint Report.

Scope	Ton CO ₂ eq	Method
1	585,559	Direct Greenhouse Gas Emissions
2	8990,61	Energy-Related Indirect Greenhouse Gas Emissions
3	8259,227	Other Indirect Greenhouse Gas Emissions

6.5 Air Emissions

In order to monitor the environmental impacts of our company's air emissions, periodic emission measurements are carried out at stacks within the scope of production activities by authorized and accredited organizations. Within these measurements, particulate matter (dust) and volatile organic compounds (VOC) parameters are specifically monitored, and the results obtained are compared with the limit values set by the applicable legislation. The measurement results are reported as key performance indicators (KPIs) for the purpose of monitoring and improving environmental performance and are regularly tracked as part of the sustainability management system.

Table: Dust and VOC Emission Measurement Results for Stacks (KPI)

STACK NO	STACK NAME	KPI DUST (kg/hour)	KPI VOC (kg/hour)	MEASUREMENT DATE	DUST MEASUREMENT RESULT (kg/hour)	VOC MEASUREMENT RESULT (kg/hour)
1	Induction Furnace Process Stack	10	10	23.12.2024	0.0424	0.6360
2	Sandblasting Machines / Paint Shop – Large Parts Sandblasting Machine / Vibrating Screen Process Stack	10	10	23.12.2024	0.0333	–
3	Sand Plant, Core Shop, Molding Lines, Cooling Lines – Process Stack No. 3	10	10	31.08.2024	0.01976	–
4	Grinding and Annealing Furnace – Process Stack No. 4	10	10	31.08.2024	0.05950	<LOQ*
5	Vibrating Screen Stack	10	10	23.12.2024	0.0638	–

Note: The measurements were carried out by accredited organizations, and the results were compared with the applicable legal limit values.

Based on the measurement results, all values remained below the legal limit thresholds.

6.6 Water and Wastewater

Scope: Total Water Consumption

- **Water consumption:** 31.672 m³
- **Wastewater volume:** 28.504 m³

6.7 Waste and Circularity

Scope: Total waste quantities

- **Hazardous waste amount:** 26 tons
- **Non-hazardous waste amount:** 6,534 tons
- **Total waste amount:** 6,560 tons

6.8 Greenhouse Gas

Greenhouse Gas Emissions Data Flow and Management Procedure

1. PURPOSE

The purpose of this procedure is to define the data flow activities, control mechanisms, quality assurance processes, and related responsibilities required for obtaining, monitoring, reporting, and verifying greenhouse gas emission data whose accuracy and reliability are assured, in full compliance with the Communiqué on the Monitoring and Reporting of Greenhouse Gas Emissions.

2. SCOPE

This procedure covers the company's data flow activities related to greenhouse gas emissions, the control system, corrective actions, management of data gaps, information technology assurance, quality assurance, definition of responsibilities, outsourced activities, regular internal reviews, certifications, records, and reporting systems. It also includes Ministry approval and external verification processes.

3. RESPONSIBILITIES AND AUTHORITIES

3.1 Senior Management

- Responsible for providing the necessary resources for the monitoring and reporting of greenhouse gas emissions.

3.2 Environmental Engineer

- Prepares the Monitoring Plan, Improvement Report, Emission Report, and Corrective Action Reports.
- Responsible for updating this procedure in case of changes in the Communiqué or relevant legislation.
- Responsible for conducting internal audits for internal verification.
- Responsible for providing training to relevant personnel once a year.
- Responsible for change management and for making notifications to the Ministry.

3.3 Quality Manager

- Ensures the implementation of the quality control system.
- Reports internal audit results and updates quality assurance procedures.

3.4 Purchasing Department

- Responsible for the regular maintenance of primary data records.
- Ensures that stock records are stored and regularly updated.
- Responsible for submitting relevant records to the environmental engineer at the end of each month.

3.5 Accounting Department

- Ensures that invoice records are stored and regularly updated.
- Responsible for submitting relevant records to the environmental engineer at the end of each month.

4. DEFINITIONS

- Source Stream: Carbon-containing materials that cause emissions during consumption or production.
- Emission Source: A separately identifiable part or process of a facility from which greenhouse gas emissions are released.
- Emission Factor: A coefficient used in emission calculations that expresses the amount of greenhouse gas emissions per unit of activity.
- Activity Data: Measurable data related to energy or material consumption and production.
- Data Gap: Inaccurate or missing information arising from a lack of data during monitoring.
- Calibration: The process of checking and adjusting the accuracy and sensitivity of a measuring device or equipment against a known reference standard.
- Greenhouse Gas: Gases present in the atmosphere that increase the Earth's temperature (e.g., CO₂, CH₄) and cause climate change.
- Mass Balance Method: A calculation method based on the principle of conservation of mass within a system.

5. IMPLEMENTATION

5.1 Data Flow Activities

Primary data sources used in the calculation of greenhouse gas emissions include purchasing data, casting reports, sales data, and stock records. The mass balance method specified in Article 23/1 of the Communiqué on the Monitoring and Reporting of Greenhouse Gas Emissions is used for greenhouse gas emission calculations.

Data Flow Diagram:



Step 1: Collection of Incoming Source Stream Data

- Purchased materials arrive at the facility accompanied by delivery notes.
- Incoming materials are weighed on the weighbridge.
- The weight stated on the delivery note is compared with the weighbridge data.
- If the weighing result does not match the delivery note data, the goods are not accepted and the relevant supplier is contacted.
- Acceptance of goods verified by the weighbridge is completed.
- Accepted delivery notes are forwarded to the accounting department.
- Delivery notes are recorded in the ERP system.
- Monthly purchase quantities are extracted from the ERP system and recorded in the Greenhouse Gas file.
- Source streams controlled through purchase records include: Scrap Steel, Ductile Iron Carbon, Pig Iron Carbon, Ferrochrome, Ferromolybdenum, Ferromanganese, Ferrosilicon, and Silicon Carbide.

Step 2: Collection of Outgoing Source Stream Data

- Each product and waste sent outside the factory is weighed on the weighbridge and a delivery note is issued via the ERP system.
- Issued delivery notes are recorded in the ERP system.
- Monthly sales quantities and waste outputs are obtained from the ERP system and recorded in the Greenhouse Gas file.
- Source streams controlled through outbound records include: Products (Cast Iron) and slag.

Step 3: Collection of Production Data

- Production data are extracted from the monthly published casting reports and recorded in the Greenhouse Gas file.

Step 4: Collection of Carbon Content Data

- Analysis certificates related to the carbon content of purchased materials are obtained from supplier companies.
- Analysis certificates are recorded and archived by the quality department.
- The carbon content of Scrap Steel, Ductile Iron Pig Iron, Casting Pig Iron, and Products is selected from Annex-5, Table 5.4 of the Communiqué on Monitoring and Reporting of Greenhouse Gas Emissions.
- The carbon content of slag is obtained from analysis results.

Step 5: Integration of Data into the Report

- Monthly data are submitted to the environmental engineer by the relevant departments.
- The environmental engineer transfers the data to the monthly report file and records them.

Step 6: Data Gap Situation

- In the event of data gaps, missing data are completed using the mass balance method.
- Where the mass balance method is insufficient, one or more of the Average Value Method, Linear Regression, or Multiple Regression methods are applied.

Step 7: Publication of the Report

- The prepared report is published within the factory.

Data Control, Record Retention, and Quality Assurance

- Documents such as Integrated Management System (IMS) records, reports, test results, purchase requests, daily production, and sales reports shall be legible.
- The legibility of handwritten and computer-generated records is checked by those reviewing the records and reports.
- Illegible records are re-prepared.
- Records shall not be altered through erasing, overwriting, coloring, or similar actions.
- Where corrections are required, the incorrect entry is crossed out and initialed by the person making the correction.
- The department staff responsible for filing records indicate the document name on the spine of folders.
- Each employee is responsible for keeping the IMS records they are required to review and file in an orderly, clean, and complete manner within their department.
- Electronic reports and records are stored in designated folders under “Company Folders,” created specifically for each department. Editing rights are assigned to specific authorized personnel, and read-only access is granted to designated users.
- At the end of each year, records and reports from the previous year may be archived.
- Archived quality records are logged by the Quality Assurance Engineer in the “F-KG-010 Archive Record Form.”
- Records are archived in both physical and digital formats. Digitally stored data are backed up automatically on a monthly basis.
- All documents used in monitoring and reporting processes are retained for a minimum of 10 years.

Quality Assurance of Measurement Devices

- The large weighbridge with a capacity of 60 tons is calibrated once every two years.
- The finished product preparation scale with a capacity of 15,000 kg is calibrated once per year.

Management of Changes

- In the event of capacity or process changes in facility operations, the monitoring plan is revised by the Environmental Engineer.
- Changes are notified to the Ministry within 30 days and recorded.

Data Verification and External Audit

- Data are subject to a two-stage verification process:

Internal Verification: Conducted once a year as an internal audit by the Environmental Engineer and the Quality Manager.

External Verification: Conducted by authorized verification bodies.

- All reports are submitted to verification organizations.

Corrections and Corrective Actions

- Corrective actions for identified nonconformities are carried out in accordance with the company's Corrective Action Procedure. In this scope, necessary steps are taken to identify root causes and prevent recurrence.
- The Environmental Engineer is responsible for initiating corrective actions related to nonconformities identified in greenhouse gas monitoring and reporting processes, collecting all necessary information, and preparing the required improvement plan.
- Duties and responsibilities are clearly defined to ensure effective implementation of corrective actions. Completion timelines are set for each action and closely monitored.
- The outcomes and implementation processes of corrective actions are reviewed and evaluated by senior management, which ensures proper completion and effectiveness of improvements.
- Verification of corrective actions related to nonconformities identified in the greenhouse gas monitoring plan is performed by the Technical Director.

Improvement and Continuous Development

- The monitoring plan is regularly reviewed and improved in line with findings from internal audits, Ministry guidance documents, and sectoral requirements.
- Technical and technological developments are regularly monitored, and best practices in the sector are analyzed and integrated into processes.
- The use of higher-tier monitoring methods is preferred where technically feasible and compliant with legislation.
- The effectiveness of monitoring methods used is periodically analyzed; areas requiring improvement are identified and necessary actions are taken.
- Ministry announcements, guidance documents, and sectoral best practices are closely followed, creating opportunities for continuous process improvement.
- Improvement projects and process development activities are systematically recorded. These records are stored in Excel format to create a reference knowledge base for future use.

Activities Performed Through Outsourcing

- There are no activities carried out through outsourced services within the company.

Calculation Method

Calculations are performed using the mass balance method. Source streams are determined through activity data monitoring based on stock changes.

- Formula: $AD \times Ci \times f$
- AD: Activity Data, Ci: Carbon Content, f: 3.664 (CO₂ conversion factor)

6.8 Chemical Management

Scope: A chemical risk analysis has been conducted for all chemicals used in the company's operations, covering the entire product life cycle from supplier to end user.

DENİZCİLER DÖKÜMCÜLÜK SANAYİ VE TİCARET A.Ş.

FİRMA ADI :	DENİZCİLER DÖKÜMCÜLÜK SANAYİ VE TİCARET A.Ş.	HAZIRLAMA TARİHİ :	15.10.2025	
ADRES :	ÇORAKLAR MAH. 5912 SOKAK NO:39 ALIĞAİZMİR	GEÇERLİLİK TARİHİ :	15.10.2027	
TEHLİKE SINFI :	24.51.13 - DEMİR DÖKÜM - ÇOK TEHLİKELİ			

DEĞERLER	FREKANS DEĞERİ		OLASILIK DEĞERİ		RISK DEĞERLENDİRME SONUCU		YAPILMASI GEREKENLER	
	10	Sürekli-Saatte Bir	10	Beklenir	100	Birden çok ölüm	200-R=400	Çok Yüksek Risk
6	Günde bir	6	Olma olasılığı çok yüksek	40	% 10'dan fazla işgöremezlik veya ölüm	200-R=1440	Yüksek Risk	24 saat içinde önlem alınmalı
3	Haftada bir	3	Olma olasılığı var	15	Sakatlık, kırık, uzuv kaybı gibi geri dönüşü olmayan,meslek hastalığı	700-R=2100	Orta Risk	1 hafta içinde önlem alınmalı
2	Ayda bir	1	Olma olasılığı çok az	7	Yaralanma ve iş gücü kaybı kaza	20-R=70	Orta/Düşük Risk	Kararfastrılan uygun bir zamanda önlem alınmalı
1	Yılda birkaç kez	0,5	Olabilir, fakat çok düşük	3	Küçük yaralanma veya işgünü kayıpsız durumlar	R=25	Kabul Edilebilir Risk	Gözetim altında çalışmaya devam edebilir
0,5	Yılda bir veya daha seyrek	0,2	Beklenmez	1	Küçük hasar, yaralanma yok			

RISK DEĞERLENDİRME EKİBİ

İŞYERİN / İŞYERİN VEKİLİ	İŞ GÜVENLİĞİ UZMANI	İŞYERİ HEKİMİ	OPERASYON DİREKTÖRÜ	MAMUL HAZIRLAMA MÜDÜRÜ	İNSAN KAYNAKLARI MÜDÜRÜ	ÇEVRE MÜHENDİSİ	ÇALIŞAN BAŞ TEMSİLCİSİ	ÇALIŞAN TEMSİLCİSİ
ERHAN ÖZKAN	ÖZGÜR BOYLU	DR. GÜLHAN TUNÇ	OSMAN KARABACAK	SÜLEYMAN TAŞKIN	GÜLSÜM YÜKSEL ŞENTÜRK	ŞÜKRÜ KÖMÜRÇÜOĞLU	TUNCAY YILDIRIM	YILMAZ KURT

S.NO	KİMYASAL ADI-TANIMI FİZİKSEL VE KİMYASAL ÖZELLİKLERİ	MARUZİYET SINIR DEĞERİ (TWA 8 SAAT (PPM/ MG/M3)	CAS NO	TEHLİKE SEMBOLÜ VE İŞARETİ	MARUZ KALAN ÇALIŞANLAR, MARUZİYET TÜRÜ, DÜZEYLİ SÜRESİ	TEHLİKELİ BİLEŞENLERE YÖNELİK YAPILAN KİŞİSEL MARUZİYET KİMYASAL ÖLÇÜM SONUÇLARI	TEHLİKENİN TANIMI	GÜVENLİK İFADELERİ	İLK YARDIM ÖNLEMLERİ	ALINMASI GEREKEN ÖNLEMLER	MEVCUT DURUM	RISK VE TEHLİKE	DÜZENLİ OLARAK YAPILAN İZLENİMLER (YER)	RISK SINIFI (YER)	SÜRE	SORUMLU KİŞİ	AÇIKLAMA	DÜZENLİ OLARAK YAPILAN İZLENİMLER (YER)	SÜRE	
																				1
01	KOKUSUZ TATSİZ, AKR BAKIYEMENTE, KOÇULUĞU YÜKSEKTİR, HAZLI BİHNELER VE SENLEŞİR																			
1	HAZLI HAZIRLANANLARLA REAKSİYONA GİREBİLİR																			

6.9 Environmental Drills

Scope: This covers the collection of data required to enable Denizciler Dökümcülük San. ve Tic. A.Ş. management to make prompt and accurate decisions during environment-related emergencies, the preparation of action plans, the implementation of measures to protect life and property, and the organization of damage assessment, emergency response, and rescue team activities.

Environmental drills are conducted once a year at our facility. Participants are recorded in the drill participation list. After each drill, drill reports are completed and submitted to the relevant departments.

 DENİZCILER DOKÜMANTÜK AÇIL DURUM TATBİKAT RAPORU	
Tatbikat Yapılan Birim Talaşlı İmalat (Çevresel Kaza tatbikati)	
Tatbikat tipi <input type="checkbox"/> Deprem <input type="checkbox"/> Yangın <input checked="" type="checkbox"/> Atık Sızıntısı <input type="checkbox"/> Sel ve Su Basması <input type="checkbox"/> Tahliye	
Tatbikatın tarihi 22.02.2024	
Tatbikatın şekli <input checked="" type="checkbox"/> İhbarlı <input type="checkbox"/> İhbarsız <input type="checkbox"/> Kısmi İhbarlı <input type="checkbox"/> Diğer:	
Birimdeki toplanma bölgenin sayısı <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> Diğer:	
Tatbikat başlama saati 12:00 Tatbikat bitiş saati 12:30	
Tatbikat lideri Alper Aydınal	
Gözetmeni (varsa) Şükrü Kömürçüoğlu - Miray İdga	
TATBİKAT SENARYOSU: <p>Talaşlı İmalat Bölümü Mühendisi Ekin Mert Yalçın talaşlı imalat bölümünde CNC makinesinde szanti olduğunu fark etmiştir. Olayı Çevre Mühendisi Şükrü Kömürçüoğlu'na haber vermiştir. Talaşlı imalat atölyesinde bulunan emilici pad ile sorun boyu yağ temizlenmiştir.</p> <p>Tamirlik sonrası kontamine olan emilici pad bir peçete içine koyularak tehlikeli stik geçirdi depodama alınması aktarılmıştır.</p> <p>Olay yerinde Çevre Mühendisi Şükrü Kömürçüoğlu kısa bir eğitim vererek böyle bir sorun olursa nasıl müdahale edileceğini ve nelere dikkat edileceğini bölüm çalışanlarına anlatmıştır.</p>	

Tk Yayın Tarihi: 01.02.2024 Raporun No: R9 Zeytinin Tarihi: F-130-001

Ekiplere Ait Tatbikat Bilgileri (Hayır olarak işaretlediğiniz durumda lütfen gördüğünüz aksaklığı belirtiniz)					
1	Yanık Ekibi görevini tamamladı. <input type="checkbox"/> Evet <input type="checkbox"/> Hayır	2	Arama, Kurtarma ve Tahliye ekibi görevini tamamladı. <input type="checkbox"/> Evet <input type="checkbox"/> Hayır	3	İlk yardım ekibi görevini tamamladı. <input type="checkbox"/> Evet <input type="checkbox"/> Hayır
4	İstisnai ekibi görevini tamamladı. <input type="checkbox"/> Evet <input type="checkbox"/> Hayır	5	Teknik Ekib görevini tamamladı. <input checked="" type="checkbox"/> Evet <input type="checkbox"/> Hayır	6	Diğer: <input type="checkbox"/> Evet <input type="checkbox"/> Hayır
TATBİKATA İLGİLİ GÖRÜLEN EKSKLİKLER VE ÖNERİLER: <ul style="list-style-type: none"> Talaşlı İmalat Bölümünde emilici pad sürüklü bulundurulmalıdır. Emilici pad olmadığında veya yeterli gelmediği durumlarda talaş emilici malzeme olarak kullanılabilir. Bu durumlar için bölüme sürekl ve sağırta bulunmalıdır. 					
Değerlendirme <input type="checkbox"/> Zayıf <input type="checkbox"/> Orta <input checked="" type="checkbox"/> İyi <input type="checkbox"/> Çok İyi					
Hedef <input type="checkbox"/> Zayıf <input type="checkbox"/> Orta <input checked="" type="checkbox"/> İyi <input type="checkbox"/> Çok İyi					
Tatbikata İlişkin Ek Dokümanlar (Fotoğraf, video kaydı vb.) <input checked="" type="checkbox"/> Fotoğraf <input type="checkbox"/> Video Kaydı <input type="checkbox"/> Listeler <input type="checkbox"/> Diğer:					
Tatbikatın Onaylayan Gürkan Marşan		Tatbikatın Yürüten Alper Aydınal		İş Güvenliği Uzmanı & Çevre Müh. Miray İdga & Şükrü Kömürçüoğlu	
Tarih: 22.02.2024		Tarih: 22.02.2024		Tarih: 22.02.2024	
Ekl: Çevresel Kaza (Sızıntı-Döküntü) Tatbikat Fotoğrafları					

Tk Yayın Tarihi: 01.02.2024 Raporun No: R9 Zeytinin Tarihi: F-130-001

Ekl: Çevresel Kaza (Sızıntı-Döküntü) Tatbikat Fotoğrafları



Tk Yayın Tarihi: 01.02.2024 Raporun No: R9 Zeytinin Tarihi: F-130-001

 DENİZCILER DOKÜMANTÜK EMERGENCY DRILL REPORT	
Exercise Unit Machining (Environmental Accident drill)	
Drill type <input type="checkbox"/> Earthquake <input type="checkbox"/> Fire <input checked="" type="checkbox"/> Waste Leakage <input type="checkbox"/> Flood and Flooding <input type="checkbox"/> Evacuation	
History of the exercise 22.02.2024	
Method of application <input checked="" type="checkbox"/> Notice <input type="checkbox"/> Without <input type="checkbox"/> Notice Partial Notice <input type="checkbox"/> Other:	
Number of assembly zones in the unit <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> Other:	
Drill start time 12:00 Drill end time 12:30	
Exercise leader Alper Aydınal	
Observer (if applicable) Şükrü Kömürçüoğlu - Miray İdga	
EXERCISE SCENARIO: <p>Ekin Mert Yalçın Machining Department Engineer noticed that there was a leak in the CNC machine in the machining department. He reported the incident to Environmental Engineer Şükrü Kömürçüoğlu. The leaking boron oil was cleaned with the absorbent pad kept in the machining workshop.</p> <p>After cleaning, the contaminated absorbent pad was placed in a bag and transferred to the hazardous waste temporary storage area.</p> <p>Environmental Engineer Şükrü Kömürçüoğlu gave a short training at the scene and explained to the department employees how to intervene and what to pay attention to in case of such a leak.</p>	

First Publication Date: 01.02.2024 Raporun No: R9 Zeytinin Tarihi: F-085-001

Drill Information of the Teams (If you mark No, please indicate the problem you see.)					
1	The Fire Team completed its task. <input type="checkbox"/> Yes <input type="checkbox"/> No	2	The Search, Rescue and Evacuation team completed its task. <input type="checkbox"/> Yes <input type="checkbox"/> No	3	The First Aid team completed its task. <input type="checkbox"/> Yes <input type="checkbox"/> No
4	The communication team has completed its task. <input type="checkbox"/> Yes <input type="checkbox"/> No	5	The Technical Team has completed its task. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	6	Other: <input type="checkbox"/> Yes <input type="checkbox"/> No
DEFICIENCIES AND SUGGESTIONS REGARDING THE EXERCISE: <ul style="list-style-type: none"> Absorbent pad should be kept in the machining department at all times. In cases where there is no absorbent pad or it is not sufficient, wood shavings can be used as an absorbent material. For these situations, shovels and brooms should be available in the section. 					
Assessment <input type="checkbox"/> Slim <input type="checkbox"/> Middle <input checked="" type="checkbox"/> Good <input type="checkbox"/> Very good					
Goal <input type="checkbox"/> Slim <input type="checkbox"/> Middle <input checked="" type="checkbox"/> Good <input type="checkbox"/> Very good					
Additional Documents Related to the Exercise (Photograph, video recording, etc.) <input checked="" type="checkbox"/> Photograph <input type="checkbox"/> Video Recording <input type="checkbox"/> Lists <input type="checkbox"/> Other:					
Approver of the Exercise Gürkan Marşan		Conducting the Exercise Alper Aydınal		Occupational Safety Specialist & Environmental Eng. Miray İdga & Şükrü Kömürçüoğlu	
Date: 22.02.2024		Date: 22.02.2024		Date: 22.02.2024	

First Publication Date: 01.02.2024 Raporun No: R9 Zeytinin Tarihi: F-085-001

Appendix 1: Environmental Accident (Leak-Spill) Drill Photos



First Publication Date: 01.02.2024 Raporun No: R9 Zeytinin Tarihi: F-085-001

6.10 Environmental KPI's

KPIs	2020	2021	2022	2023	2024
Scrap Recycled (tons)	8.496	10.230	10.896	8.766	7.811
Sand Waste (tons)	2.646,50	7.299,14	8.013,42	3.491,77	6.077,73
Coolant Oil (tons)	1,65	3,27	3,99	4,63	1,79
Hydraulic Oils (tons)	1,60	0,00	2,23	2,58	0,48
Contaminated Wastes (tons)	23,00	15,72	28,25	25,32	21,03
Waste Electronic components (tons)	1,29	0,46	1,44	0,28	0,23
Medical Waste (tons)	0,02	0,01	0,01	0,01	0,00
Florecent Lamp Waste (tons)	0,18	0,21	0,32	0,07	0,10
Water Consumption (m ³)	24.633,00	26.238,00	27.718,00	31.795,00	31.672,00
Total Energy Consumption (kW)	19.962.501	24.567.575	24.957.410	21.370.818	18.808.806
Hazardous Wastes (Mtons)	28,25	20,39	36,98	34,62	25,84
Non- Hazardous Wastes (Mtons)	2.880,22	7.326,40	8.013,42	4.670,69	6.533,91
Total Wastes (Mtons)	2.908,46	7.346,79	8.050,40	4.705,31	6.559,75

Data Sources:

Weighbridge tickets obtained from licensed waste transportation and recovery companies

National Waste Transport Forms (UATF)

Waste declaration system records

Verification and Monitoring:

Waste quantities are regularly monitored, recorded, and reported on an annual basis. The data are controlled within the scope of the environmental management system. The quantities of water recycled and reused are also regularly monitored, recorded, and reported annually.

6.11 Commitment to International Environmental Initiatives

Our company will carry out its environmental and social sustainability approach in line with the United Nations Sustainable Development Goals (SDGs).

7) ETHICS

7.1 Business Ethics and Compliance

Denizciler Dökümcülük adopts a human resources management approach that embraces diversity and human rights and is participatory, equitable, value-creating, and focused on continuous improvement. The purpose of this approach is to preserve the company's dynamic structure while promoting a corporate culture that is innovative, oriented toward sustainable success, and based on learning together.

In all our activities and every step we take, we prioritize a people-centered approach and ethical values, aiming to create a working environment that contributes to economic, social, and environmental sustainability.

Human Resources management is responsible for supporting the achievement of company objectives by increasing employee performance within an effective organizational structure, creating a dynamic and development-oriented environment, and aligning corporate goals with individual goals. Human Resources practices are shaped with the objective of creating a motivated workforce profile supported by training to facilitate multi-dimensional idea generation.

Denizciler commits to upholding human rights, preventing modern slavery, promoting freedom of association and collective bargaining, respecting the rights of minorities and indigenous peoples, protecting land, forest, and water rights, and ensuring ethical practices in security arrangements.

Our company prohibits all forms of modern slavery, forced labor, child labor, human trafficking, discrimination, harassment, or violations of fundamental human rights within its operations and supply chain.

For employees with disabilities or belonging to minority groups, we always assign a designated person responsible for their support. All rights and interests of minorities and indigenous peoples are reserved. We ensure equal working conditions for everyone, regardless of gender, color, ethnic origin, or level of disability.

7.1.2 Ethics, Compliance, and Responsible Business Conduct Policy

1. Purpose

The purpose of this document is to establish a culture of ethical, honest, transparent, and responsible business conduct within the company, and to prevent and manage all ethical risks, including fraud, corruption, bribery, conflicts of interest, competition violations, data privacy breaches, and human rights violations.

2. Scope

This policy applies to all employees, managers, interns, contractors, suppliers, subcontractors, and all third parties acting on behalf of the company.

3. Legal Basis and References

This policy is aligned with the Universal Declaration of Human Rights, ILO Conventions, the United Nations Sustainable Development Goals (SDGs), the OECD Guidelines for Multinational Enterprises, national legislation, and the ISO 37001, ISO 45001, and SA8000 standards.

4. Ethical Principles

Our company operates in line with the principles of integrity, transparency, accountability, impartiality, compliance with laws, and respect for stakeholders.

5. Fraud, Corruption, and Bribery

Our company applies zero tolerance toward fraud, corruption, bribery, embezzlement, forgery, and similar unethical practices. No employee or third party may engage in such behavior.

6. Approval Procedure for Sensitive Transactions

The company implements written approval and recording mechanisms to prevent sensitive transactions—such as gifts, hospitality, representation, entertainment, travel, and similar activities—from leading to bribery, corruption, or conflicts of interest. Any gift-giving or receiving, hospitality, or representation activity involving third parties must be reasonable, proportionate, and directly related to business. Cash or cash-equivalent gifts and any gifts or hospitality offered to public officials are strictly prohibited. Sensitive transactions are subject to prior approval by the relevant unit manager and, where necessary, senior management; unapproved transactions are not permitted. All approvals are recorded in writing, and relevant documents (approval forms, invoices, etc.) are retained in accordance with legislation and internal company rules. Violations of these rules are subject to disciplinary action and, where necessary, legal sanctions.

7. Prevention of Conflicts of Interest

Employees are obliged to avoid situations where personal interests may conflict with the interests of the company. Potential conflicts of interest must be reported to management.

8. Fair Competition and Market Conduct

Our company complies with competition law and does not permit price-fixing, cartel activities, or practices that restrict competition.

9. Data Privacy and Information Security

Personal data and commercial information are protected on the basis of confidentiality and are used only by authorized persons in compliance with applicable legislation.

10. Human Rights and Labor Standards

Our company applies zero tolerance to discrimination and harassment. Child labor, forced labor, and human trafficking are strictly prohibited.

11. Complaint and Whistleblowing Mechanism

All ethical violations may be reported through a confidential, anonymous, and retaliation-protected complaint/whistleblowing mechanism.

12. Confidentiality and Non-Retaliation

Any form of retaliation against individuals who submit reports or participate in investigations is strictly prohibited.

13. Assessment, Investigation, and Sanctions

Ethical violations are investigated impartially. Where necessary, disciplinary sanctions and legal notifications are applied.

14. Senior Management Oversight

The ethics management system is regularly monitored and reviewed by senior management.

15. Training and Awareness

Employees receive regular training on ethics, compliance, and human rights.

16. Record Retention

Ethical reporting and investigation records are retained for a minimum of five years.

17. Entry into Force and Review

This policy enters into force as of its publication date and is reviewed at least once a year.

ANNEX – Ethics Complaint / Whistleblowing Form

Name and Surname (Optional):

Department / Company:

Subject of Notification:

Description of Incident:

Date / Signature:

7.1.3 Workers' and Human Rights – KPI Set

KPI 1 – Pay Ratio

Definition:

This indicator is calculated to monitor pay equity without using individual internal wage data. It is based on the minimum and maximum Social Security Institution (SGK) earnings subject to premiums determined by the government for the relevant year.

Calculation Methodology:

The pay ratio is calculated by dividing the monthly maximum earnings subject to SGK premiums by the monthly minimum earnings subject to SGK premiums.

Official Reference Values Used (2024):

SGK Monthly Minimum Earnings Subject to Premiums: TRY 20,002.50

SGK Monthly Maximum Earnings Subject to Premiums: TRY 150,018.90

Calculated Pay Ratio:

$TRY\ 150,018.90 / TRY\ 20,002.50 = 7.5:1$

Percentage of employees earning below the SGK minimum threshold: 0%

Supporting Document:

SGK earnings subject to premium table (official source)

January 2024 daily earnings amount: $TRY\ 666.75 \times 50\% = TRY\ 333.38$ (*)

For the second half of December 2023: $TRY\ 223.58 \times 16\ days = TRY\ 3,577.28$

For the first half of January 2024: $TRY\ 333.38 \times 14\ days = TRY\ 4,667.32$

For the period 15/12/2023–14/01/2024:

$TRY\ 3,577.28 + TRY\ 4,667.32 = TRY\ 8,244.60$

Assessment:

This approach ensures the confidentiality of personal wage data while enabling the monitoring of the pay structure within a transparent and objective reference framework. The indicator is reviewed annually.

7.1.4 Ethics, Anti-Corruption, and Whistleblowing Management System

1. Purpose

The purpose of this document is to strengthen an ethical, transparent, and responsible business culture within the company, prevent corruption, bribery, fraud, and other ethical violations, and establish an effective complaint, whistleblowing, and control mechanism for such issues.

2. Scope

This policy applies to all employees, managers, interns, contractors, suppliers, subcontractors, and all third parties acting on behalf of the company.

3. Commitment to International Ethical Principles

Our company references the principles of the United Nations Global Compact (UN Global Compact) in matters of ethical business conduct and anti-corruption and conducts its activities in line with these principles.

4. Ethics and Anti-Corruption Commitment

Our company adopts a zero-tolerance approach toward corruption, bribery, fraud, embezzlement, forgery, and conflicts of interest.

5. Corruption Risk Assessment for Third Parties

Prior to engaging with suppliers, contractors, and other third parties, corruption and ethical risk assessments are conducted. Additional control and monitoring mechanisms are applied for high-risk third parties.

6. Audit of Anti-Corruption Controls

Controls implemented within the scope of anti-corruption efforts are periodically reviewed as part of internal audit activities, and necessary improvement actions are taken.

7. Whistleblowing Mechanism

Employees and third parties may report corruption, bribery, and other ethical violations through a confidential, anonymous, and retaliation-protected whistleblowing mechanism.

8. Confidentiality and Non-Retaliation

Reports are handled in accordance with confidentiality principles. Any form of retaliation against individuals who submit reports or participate in investigations is strictly prohibited.

9. Review, Sanctions, and Legal Notification

Identified violations are subject to disciplinary procedures. Where necessary, employment contracts may be terminated and notifications may be made to legal authorities.

10. Training and Awareness

Regular awareness training on ethical conduct, anti-corruption, and the whistleblowing mechanism is provided to employees.

11. Senior Management Oversight

The ethics and anti-corruption management system is regularly monitored and reviewed by senior management.

12. Entry into Force and Review

This document is in force and is reviewed at least once a year.

7.1.5. Measures Toward a Living Wage

Our company adopts a living wage approach in its remuneration practices to support employees in maintaining a decent standard of living. Accordingly, employee wages are assessed to ensure they are not below the statutory minimum wage determined in accordance with applicable legislation, taking into account the minimum and maximum earnings subject to premiums announced by the Social Security Institution. The wage policy aims to meet employees' basic needs and provide a fair and sustainable income level. Remuneration practices are periodically reviewed and updated in line with changes in legislation.

While complying with the principle of wage confidentiality, the company clearly defines and documents its living wage approach through its policies and procedures.

To make the living wage approach measurable and traceable, the company sets quantitative targets. In this context, the fundamental objective is to ensure that all employee wages remain above the statutory minimum wage and that no employee earns below the

SGK minimum earnings subject to premiums. The wage policy is reviewed annually, and necessary improvement actions are planned to maintain and enhance this objective.

Our company reviews and documents its living wage practices on an annual basis. Within this scope, the alignment of remuneration practices with applicable legislation, the statutory minimum wage, and SGK earnings subject to premium thresholds is evaluated. Evaluation results are monitored through internal reports, and improvement actions are planned where deemed necessary. In line with the principle of wage confidentiality, general practices related to the living wage approach are documented without disclosing individual salary information.

7.2 Privacy and Information Security

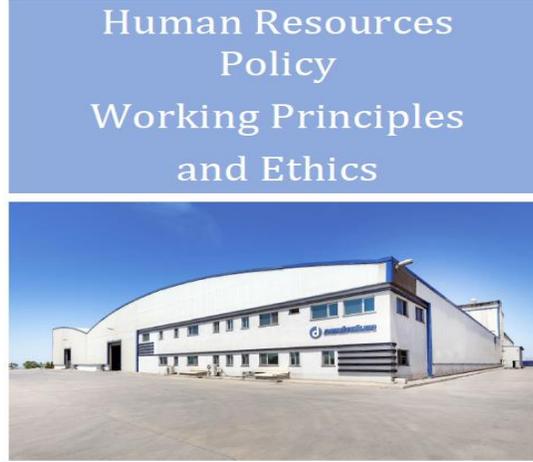
The Law on the Protection of Personal Data aims to demonstrate that information security management is ensured across people, infrastructure, software, hardware, user information, organizational information, third-party information, and financial resources; to secure risk management; to measure the performance of information security management processes; and to regulate relationships with third parties regarding information security. In line with this framework, our company has established its procedures by adhering to the following principles and policies:

- To protect Denizciler Dökümcülük's information assets against all threats that may arise internally or externally, intentionally or unintentionally; to ensure appropriate access to information in line with business processes; to meet legal and regulatory requirements; and to carry out continuous improvement activities.
- To prevent unauthorized or unlawful access, use, modification, disclosure, deletion, transfer, or damage to information assets made available for use, in accordance with the core principles of information security: confidentiality, integrity, and availability.
- To address the security of all information assets not only in electronic form but also in written, printed, verbal, and similar formats.
- To take, implement, and continuously improve the measures required to ensure compliance with the legal requirements of Law No. 6698.
- To commit to carrying out the necessary activities to ensure the privacy and confidentiality of all personal data within the scope of the law.
- To raise awareness by providing Information Security Management and KVKK training to all personnel.
- To ensure that KVKK-related personnel adopt a conscious approach to information security, fulfill their responsibilities, and show the utmost care in complying with published policies, procedures, instructions, and announcements.
- To ensure that all actual or suspected vulnerabilities targeting information security are evaluated within the scope of information security incident management, and that, based on these evaluations, existing controls are updated or new controls are implemented as soon as possible.
- To prepare, maintain, and test business continuity plans.

7.3 Compliance Ethics and Integrity

Denizciler Dökümcülük's Code of Business Ethics, which governs its relationships with customers, employees, suppliers, business partners, competitors, the environment, and society, is structured around four main principles: obligations, integrity, confidentiality, and conflicts of interest.

The Denizciler Human Resources Policy – Working Principles and Code of Ethics, which was updated in January 2024, is available in the languages in which we operate (Turkish and English).



First Publication Date: 31.03.2020 Revision Date: 01.01.2023 Revision Number: R3 EK-İK-002

7.4. Corruption and Bribery Risk Assessment

Our company has established a process for the systematic and periodic assessment of risks within the scope of combating corruption and bribery. Accordingly, corruption and bribery risk assessments are conducted at least once a year, taking into account the nature of company activities, sectoral risks, and stakeholder interactions.

During the risk assessment process, high-risk areas—particularly procurement, supplier relations, interactions with public authorities, sales processes, and collaborations with third parties—are analyzed. Potential risks are identified, prioritized, and the necessary preventive and corrective actions are defined.

The results of the risk assessment are documented in writing, shared with senior management, and responsibilities and implementation timelines are assigned for the identified actions. Assessment outputs are used as inputs for the review of the company's Code of Ethics and Anti-Corruption Policy.

Within this process, awareness and ethics training programs for employees are planned and implemented based on the outcomes of the risk assessment. The corruption and bribery risk assessment process is regularly reviewed in line with a continuous improvement approach.

Risk Scoring Methodology:

The risk score is calculated by multiplying the Probability (P) and Impact (I) values.

$$\text{Risk Score} = P \times I$$

1–6: Low Risk

7–14: Medium Risk

15–25: High Risk

Risk Assessment Table

Risk Area	Risk Description	P	I	Risk Score	Risk Level	Existing Controls	Additional Action	Responsible	Review Frequency
Procurement Processes	Irregularities in scrap and consumables purchases	3	4	12	Medium	Approval procedure, authorization matrix	Supplier ethics commitment	Procurement	Annual
Supplier Relations	Acceptance of gifts or benefits	3	3	9	Medium	Code of Ethics	Ethics training	HR	Annual
Public Relations	Improper payments during permit/inspection processes	2	5	10	Medium	Anti-corruption policy	Dual-signature system	Senior Management	Annual
Third Parties	Indirect bribery via consultants/intermediaries	3	4	12	Medium	Contractual provisions	Third-party risk assessment	Management	Annual

7.5 Sustainable Supply Chain

Environmental Legal and Other Requirements Management Procedure

Purpose:

The purpose of this procedure is to define the methods and activities required to obtain, identify, monitor, update, and keep under control national and local legal requirements, customer requirements, and other voluntary requirements that Denizciler Dökümcülük has committed to comply with, for all activities with which it interacts.

Definitions

- Law: Written legal rules enacted and put into force by the competent authorities in accordance with the procedures and forms stipulated by the Constitution.
- Legislation: Laws, decrees, regulations, etc., in force within a country.
- Regulation: The entirety of regulatory rules and criteria prepared by ministries and public legal entities to ensure the implementation of laws and decrees.
- Communiqué: Notifications prepared to implement laws and regulations.

Responsibilities

- Quality Department: Responsible for monitoring and obtaining legal regulations related to quality, environment, and production.
- Human Resources: Responsible for monitoring and obtaining legal regulations related to Labor Law and Occupational Health and Safety.
- Finance Department: Responsible for monitoring and obtaining legal regulations related to financial affairs.
- Production Department: Responsible for monitoring and obtaining legal regulations related to energy management.
- Purchasing Department: Responsible for monitoring and obtaining legal regulations related to imports.

Scope of Supplier Evaluation

The Purchasing Department prepares the Approved Supplier List (LS-SA-001) based on material types. For the companies included in the approved supplier list, the evaluation scope is as follows:

- Are OHS (KGS) certificates available and/or do they hold approved certifications?
- Do they conduct their activities in accordance with a product life cycle approach?

- Does the product meet the required quality standards? (Quality performance)
- Is the product delivered on time and in compliance with delivery schedules? (Supply chain performance)
- Is the order lot quantity complied with? (Supply chain performance)

Evaluation of New Suppliers

When working with a new supplier, the required technical specifications of the material are first determined and sent to the supplier. Samples meeting the specified requirements are requested. The samples and accompanying technical documentation provided by the supplier are evaluated—and where possible tested—by the Quality Control Department or Department Managers. If found suitable, an order may be placed. If deemed necessary, the supplier may be audited on-site by company auditors.

Calculation of Supplier Quality Scores

The Purchasing Department conducts a performance evaluation as outlined below and prepares the supplier list. The Quality Department informs the Purchasing Manager about the “Incoming Quality Performance.” Supplier evaluations are conducted annually. The Approved Supplier List is updated, and suppliers are informed of their quality scores.

External suppliers performing processing operations on semi-finished products may be subject to audits by the Quality Department outside the general evaluation method, where deemed necessary.

The decision to work with a supplier is made with the approval of the Quality Manager and the Purchasing Manager, taking into account the supplier’s quality level and associated risks.

Supplier Quality Score Calculation

QUALITY SCORE = QS

QS = I + II + III + IV = 100

QS = Certification + Quality + Delivery + Lot Compliance

Evaluation Factors and Maximum Scores

I – Quality System / Certification: 5

II – Quality Compliance: 45

III – On-Time Delivery Performance: 25

IV – Lot Compliance: 25

Maximum Score: 100

Total: 100

I. Certification Criterion

In calculating this score, certifications held by the supplier company—such as ISO 9000 Quality Assurance System Certificate, TSE Certificate, etc.—are taken into account and evaluated by purchasing officers out of 5 points.

Supplier holds ISO 9000 Quality Assurance System Certificate: 5 points

Supplier holds no certification: 0 points

II. Quality Performance

Quality performance is determined proportionally based on the percentage of accepted lots within the total batch of inputs supplied by the supplier.

For example:

Company Name	Total Incoming Lots	Total Accepted Lots	Calculation Method	II. Quality Performance
X	50	40	$(40 / 50) \times 45 = 32$	32

III. Delivery Performance (Shipment)

Delivery performance is evaluated as follows:

Delivery Status	III. Score
On-time delivery	25 points
1–3 days delay	17 points
4 days to 1 week delay	14 points
1–2 weeks delay	11 points
Longer delays	0 points

IV. Quantity Compliance (Shipment Quantity)

Quantity compliance is evaluated as follows:

Delivery Quantity Status	IV. Score
Full quantity delivered	25 points
±20% under/over delivery	10 points
±30% under/over delivery	5 points
Above ±30%	0 points

Total Quality Score Calculation:

$$QS = I + II + III + IV$$

Example – Total Quality Score of the Sample Supplier

Company Name	I	II	III	IV	Total Score	Quality Group
X	5	45	25	25	100	A

Suppliers are classified into groups based on their evaluation results as follows:

QS Range	Group	Evaluation	Description
100–86	A	Very Good	Continuous material procurement is possible.
85–65	B	Good	Has areas open to improvement.
64–50	C	Average	Not preferred unless necessary.
49–10	D	Weak	Engagement subject to management decision.

7.5 Risk-Based Assessment

Risk Management Procedure

Purpose: To identify and assess corporate risks and opportunities arising from Denizciler Dökümcülük’s activities.

Scope: Covers internal and external issues affecting Denizciler Dökümcülük, the expectations of relevant stakeholders, and the assessment of risks and opportunities related to activities, products, and services.

Definitions:

Risk: An uncertain event or condition that, if it occurs, negatively affects at least one of the project objectives in terms of time, cost, scope, or quality.

Opportunity: An event or condition that may have positive effects if it occurs or is utilized.

During the establishment and operation of the Quality and Environmental Management System, risks and opportunities are evaluated by considering potential issues/topics as well as the views of internal and external interested parties. This evaluation aims to:

- Ensure the management system achieves its intended outcomes,
- Assess opportunities to achieve desired effects,
- Identify risks to prevent or reduce undesired effects.

7.6 Environmental Management and Animal Rights

Over the years, Denizciler Dökümcülük has planted more than 800 trees and 10,000 flowers within the factory premises. We value nature and support natural habitats. Our environmental policy covers energy efficiency, water consumption and management, air quality, responsible chemical management, sustainable resource management, and waste reduction.



We prioritize human health, environmental rights, and animal rights in our production and investment programs. In all our activities, we adopt effective environmental management practices and the continuous improvement of environmental performance criteria as a core policy.

We are committed to maintaining high animal welfare standards in our operations. We ensure that all activities involving animals comply with ethical practices, humane treatment, and applicable regulations.

We recognize the importance of soil health and conservation. We implement practices that protect soil quality, prevent erosion, promote sustainable land use, and support soil restoration efforts where appropriate.



8) SOCIAL RESPONSIBILITY

Denziciler Dökümcülük provides support to a large number of students pursuing undergraduate education. In addition to scholarships granted to the children of our employees, the company also undertakes the provision of materials and equipment.

Denziciler Dökümcülük also contributes to meeting the social needs of the areas surrounding our industrial zone and provides material support to the Police and Gendarmerie organizations.

We work toward a Sustainable Future for our youth and employees, placing importance on nature and social well-being.





At Denizciler Dökümcülük, the Human Resources Department organizes internal social activities and events for company employees. The participation of the Board of Directors and all managers in these events is considered important. In addition to strengthening internal communication, these activities aim to increase employee motivation and ensure coordination among departments.

Events such as the New Year's Dinner, Target Achievement Celebration Dinners, International Women's Day on March 8, birthday celebrations, and other special occasions are organized to provide employees with enjoyable opportunities to come together.



Denizciler Dökümcülük has an established Suggestion and Complaint System, Kaizen Projects, and an Incentive and Reward System in place.



Suggestion-Complaint

To ensure that all level of employees at Denizciler Dökümcülük and contractors or suppliers can add value to our Company.



Kaizen System

To create an environment for employees to solve problems



Reward System

To ensure that benefits provided by the suggestion and Kaizen system can be shared with the employees



9) STRATEGY AND MANAGEMENT

Our sustainability strategy is based on the following core principles.



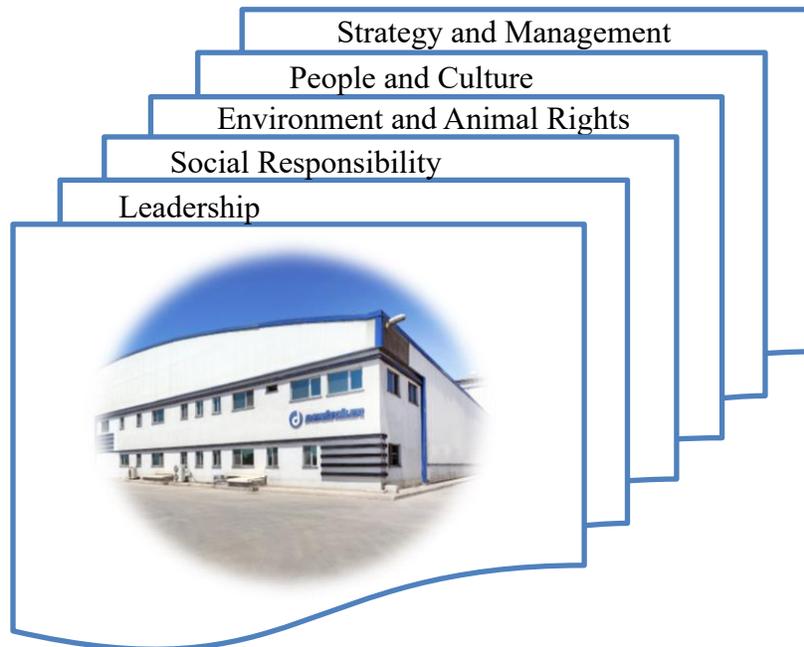
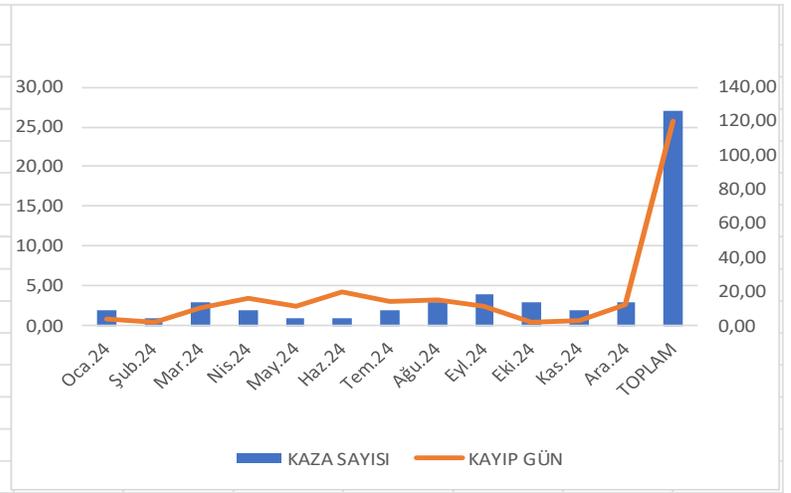
To ensure successful and sustainable production, Denizciler relies on its employees and, in particular, values women’s labor. We believe that gender equality is a strong driver of economic and corporate success.

Year	Female Employees	Male Employees	Percentage of Women in Senior Management	Percentage of Women in Sustainability and Related Committees
2024	35	262	33%	41%

9.1 OHS KPI Set

Indicator	Value
Total number of employees	297
Number of occupational accidents (annual)	27
Number of lost-time occupational accidents	27
Number of lost days	120
Occupational accident frequency rate (if applicable)	3.38
Employees receiving OHS training / %	100%

DÖNEM	KAZA SAYISI	KAYIP GÜN
Oca.24	2,00	4,00
Şub.24	1,00	2,00
Mar.24	3,00	10,00
Nis.24	2,00	16,00
May.24	1,00	11,00
Haz.24	1,00	20,00
Tem.24	2,00	14,00
Ağu.24	3,00	15,00
Eyl.24	4,00	11,00
Eki.24	3,00	2,00
Kas.24	2,00	3,00
Ara.24	3,00	12,00
TOPLAM	27,00	120,00
ORTALAMA	3,38	15,00



9.2 Annual Environmental Metrics

KPIs	2020	2021	2022	2023	2024
Gross Production (tons)	13.299	17.971	19.384	15.575	13.608
Net Production (tons)	8.294	10.836	11.634	9.552	8.429
Scrap Recycled (tons)	8.496	10.230	10.896	8.766	7.811
Sand Waste (tons)	2.646,50	7.299,14	8.013,42	3.491,77	6.077,73
Coolant Oil (tons)	1,65	3,27	3,99	4,63	1,79
Hydraulic Oils (tons)	1,60	0,00	2,23	2,58	0,48
Contaminated Wastes (tons)	23,00	15,72	28,25	25,32	21,03
Waste Electronic components (tons)	1,29	0,46	1,44	0,28	0,23
Medical Waste (tons)	0,02	0,01	0,01	0,01	0,00
Florecent Lamp Waste (tons)	0,18	0,21	0,32	0,07	0,10
Water Consumption (m ³)	24.633,00	26.238,00	27.718,00	31.795,00	31.672,00
Total Energy Consumption (kW)	19.962.501	24.567.575	24.957.410	21.370.818	18.808.806
Hazardous Wastes (Mtons)	28,25	20,39	36,98	34,62	25,84
Non- Hazardous Wastes (Mtons)	2.880,22	7.326,40	8.013,42	4.670,69	6.533,91
Total Wastes (Mtons)	2.908,46	7.346,79	8.050,40	4.705,31	6.559,75
Customer Health and Safety Incidents	0,00	0,00	0,00	0,00	0,00
Product Recalls	0,00	0,00	0,00	0,00	0,00

Data Sources:

Weighbridge tickets obtained from licensed waste transportation and recovery companies

- National Waste Transport Forms (UATF)
- Waste declaration system records
- Electricity bills
- Water bills
- Operational records
- Environmental management system records

Verification and Monitoring

Waste quantities are regularly monitored, recorded, and reported on an annual basis. The data are controlled within the scope of the environmental management system.

The quantities of water recycled and reused are also regularly monitored, recorded, and reported annually.

9.3 Science-Aligned Emission Reduction Action Plan

Scope: Scope 1 and Scope 2

Base Year: 2024

Overall Target: Reduce total greenhouse gas emissions by **5% by 2027**

1. Energy and Emissions Monitoring

Action: Monthly monitoring and annual reporting of electricity and fuel consumption

Scope: Scope 1 – Scope 2

Start: 2025

Target: Improve data accuracy and traceability

2. Furnace and Melting Efficiency

Action: Energy analysis of melting furnaces and reduction of downtime

Scope: Scope 1

Start: 2025

Target: 5% reduction in energy consumption

3. Electricity Consumption Efficiency

Action: Replacement of fluorescent lighting with LED and use of energy-efficient equipment

Scope: Scope 2

Start: 2025

Target: 5% reduction in electricity consumption

4. Raw Material and Scrap Efficiency

Action: Scrap quality control and reduction of yield losses

Scope: Scope 1

Start: 2026

Target: Reduce energy consumption per ton of production

5. Renewable Energy Assessment

Action: Evaluation of green electricity and solar power plant (SPP) feasibility

Scope: Scope 2

Start: 2027

Target: Reduce electricity-related emissions

6. Training and Awareness

Action: Energy efficiency training programs

Scope: Scope 1 – Scope 2

Start: 2026

Target: Reduce behavior-related energy losses

7. Transition to Science-Based Targets

Action: Evaluation of Science Based Targets initiative (SBTi) methodologies

Start: 2027

Target: Define SBTi-aligned targets in the medium term

10) HIGHLIGHTS IN 2024

The casting process is highly energy-intensive. Between 2022 and 2024, we implemented measures in our production operations to promote sustainability, aiming not only to achieve energy savings but also to minimize the use of other resources

To enable a sustainable casting process and to produce the highest-quality castings with minimal resource use and without scrap on the first attempt, we invested in a new DISA molding line. In addition, this machine is equipped with a smaller hydraulic unit that delivers improved energy efficiency.



We invested in a new DISA Monitizer CIM digital tool to continuously optimize process parameters in order to reduce casting defects and scrap.



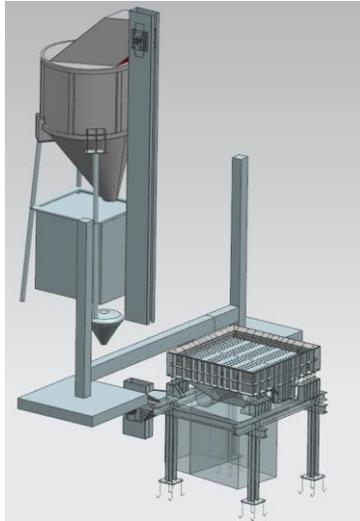
Monitizer|CIM

Using Monitizer® | CIM, individual foundries can collect data across multiple machines, then visualise it to understand their processes and inform improvements.

We installed continuous furnace feeding conveyors to minimize heat loss in the furnaces and achieve energy savings.



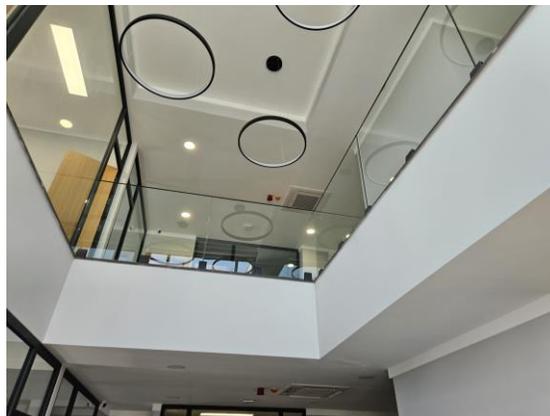
We installed a new shakeout and sand regeneration system to make the sand process circular and sustainable.



We invested in CNC Core Making Machines, CNC Vertical Machining Centers, and CNC Grinding Machines to modernize core production, mold manufacturing, and grinding processes, achieving time and energy savings.



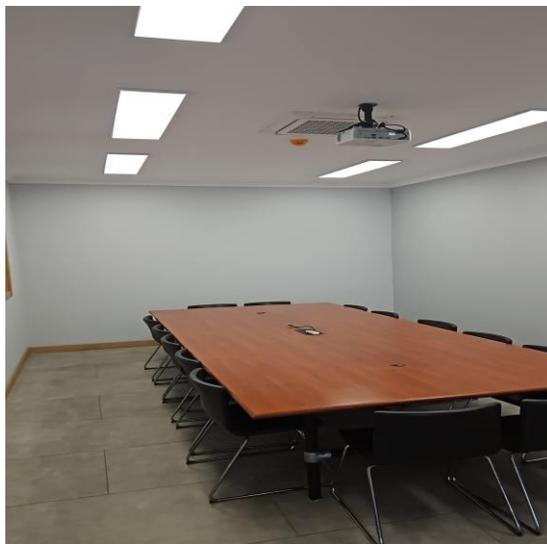
We invested in new offices, buildings, and infrastructure to improve lighting technology and insulation.



We planted trees and invested in landscaping to create a more environmentally friendly facility site.



Thanks to a high level of mobile working and the widespread use of virtual conferences and meetings, we were able to keep the number of commutes and business trips to workplaces under control.



“In 2025, we will continue our efforts in energy management, sustainability, automation, and efficiency through new investments and focus on commissioning new projects.”

11) ANNEXES

Annex A – Policy Documents

- **PO-GM-003** Environmental Policy
- **PO-GM-004** Occupational Health and Safety Policy
- **PO-GM-002** Integrated Quality Policy
- **PO-IT-002** Access Control Policy
- **PO-IT-003** Physical Security Policy
- **PO-IT-001** Data Protection (KVKK) and Information Security Policy

Annex B – Procedure and Record Samples

Environmental, Maintenance, and Operations

- **P-BKM-001** Dust Collection Filter Maintenance Procedure
- **P-BKM-002** Maintenance and Repair Procedure
- **P-ENV-001** Greenhouse Gas Emissions Data Flow and Management Procedure

- **P-ENV-003** Environmental Aspects Identification Procedure
- **P-ENV-004** Greenhouse Gas Emissions Risk Assessment Procedure

Human Resources and OHS

- **P-HR-001** Training Procedure
- **P-HR-002** Human Resources Procedure
- **P-HR-003** Disciplinary Rules Procedure
- **P-HR-004** OHS Risk and Opportunity Management Procedure
- **P-HR-005** Compliance Obligations Procedure
- **P-OHS-001** Working at Height Procedure
- **P-OHS-002** Safe Use of Man Basket (Personnel Lifting Basket) Procedure

Information Technology

- **P-IT-001** Backup and Recovery Procedure
- **P-IT-002** Physical Security Procedure
- **P-IT-003** Training and Awareness Procedure
- **P-IT-004** Access Management Procedure
- **P-IT-005** IT Risk Assessment and Risk Management Procedure

Quality Management

- **P-QM-001** Control of Documents and Records Procedure
- **P-QM-002** Internal Audit Procedure
- **P-QM-003** Control of Monitoring and Measuring Equipment Procedure
- **P-QM-004** Control of Nonconforming Product Procedure
- **P-QM-005** Corrective Action Procedure
- **P-QM-006** Ultrasonic Testing Procedure for Spheroidal Graphite Cast Irons
- **P-QM-007** Risk and Opportunity Management Procedure
- **P-QM-008** Identification and Traceability Procedure
- **P-QM-009** Change Management Procedure
- **P-QM-010** Product Control Procedure
- **P-QM-011** Management Review Procedure

Logistics, Purchasing, Sales, and Production

- **P-LOG-001** Handling and Shipping Procedure
- **P-LOG-002** Product Cleaning Procedure
- **P-MFG-001** Pattern and Sample Production Procedure
- **P-PUR-001** Purchasing Procedure
- **P-SAL-001** Sales and Marketing Procedure
- **P-MFG-002** Production Procedure