



TSRS COMPLIANT SUSTAINABILITY REPORT

2024

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Message from the Chairman

Dear Stakeholders,

As GSD Holding, we regard sustainability not merely as the reduction of environmental impacts but as the integration of long-term value creation, social benefit generation, and transparent governance into our corporate structure. In line with this vision, we are proud and honored to share our first sustainability report fully aligned with the Türkiye Sustainability Reporting Standards (TSRS) as of 2024.

Globally increasing climate risks, social inequalities, and resource management crises have made it inevitable for the private sector to assume responsibility not only for its economic performance but also for its environmental and social impacts. As GSD Holding, we aim to be an active part of this transformation.

Throughout 2024, while advancing a risk-based sustainability perspective in our financial and maritime investments, we also strengthened our corporate governance principles. As a publicly traded company, transparency, accountability, and ethical values have formed the foundation of our operations. We supported initiatives to reduce our operational carbon footprint as part of our commitment to combating climate change.

Within our corporate structure, through the Sustainability Committee established in 2025, we plan to manage our sustainability strategies with concrete targets and develop a shared value creation model together with our employees, subsidiaries, and business partners. In the coming period, we aim to further enhance our TSRS aligned disclosures, support them with broader datasets, and advance our sustainability performance in line with international best practices.

I would like to extend my sincere gratitude to all our colleagues, business partners, and stakeholders who contributed to this process.

As GSD Holding, we will continue to create value together for a sustainable future.

Sincerely,

M. Turgut Yılmaz

Chairman of the Board and Managing Member
GSD Holding A.Ş.

1. About GSD Holding

GSD Holding A.Ş. was founded in 1986 under the leadership of our Chairman of the Board, Mr. Turgut Yılmaz, initially operating in the ready-made clothing sector. In 1988, the company expanded into foreign trade, and in 1996 adopted its current name. Since 1999, GSD Holding has been publicly traded on Borsa İstanbul (BIST: GSDHO).

As of the reporting period, GSD Holding continues its operations in three main sectors:

- **Maritime**
Through GSD Denizcilik Gayrimenkul İnş. San. ve Tic. A.Ş. Türkiye’s first and only publicly traded maritime company, and its Netherlands based subsidiary GSD Shipping B.V., the Group operates in the dry bulk transportation sector. As of the reporting period, the fleet consists of 9 vessels with a total capacity of 384,094 DWT.

- **Finance**
 - **Banking:** Investment banking services are provided through GSD Yatırım Bankası A.Ş.
 - **Factoring:** Commercial financing solutions are offered through GSD Faktoring A.Ş.
 - **Asset Management:** Asset management activities are carried out through GSD Varlık Yönetim A.Ş.
- **Energy**
The company previously held a 9.60% stake in Silopi Elektrik A.Ş., with an installed capacity of 405 MWe, through which it was active in the energy sector. However, as of January 14, 2025, GSD Holding completed the sale of these shares, thereby concluding its activities in this field.

- **Other Activities**
Through GSD Eğitim Vakfı, GSD Holding contributes to education in Türkiye. The foundation supports the construction of primary schools through donations.
- The core function of GSD Holding is to define the long-term strategic goals of its subsidiaries, support the achievement of these goals, and coordinate their activities. The Group is committed to corporate governance principles in line with international standards and aims to achieve high service quality and sustainable growth.
- The company conducts its collaborations with independent audit firms and other service providers within a framework of transparency, accountability, and a commitment to excellence.

2. About the Report

2.1. Purpose

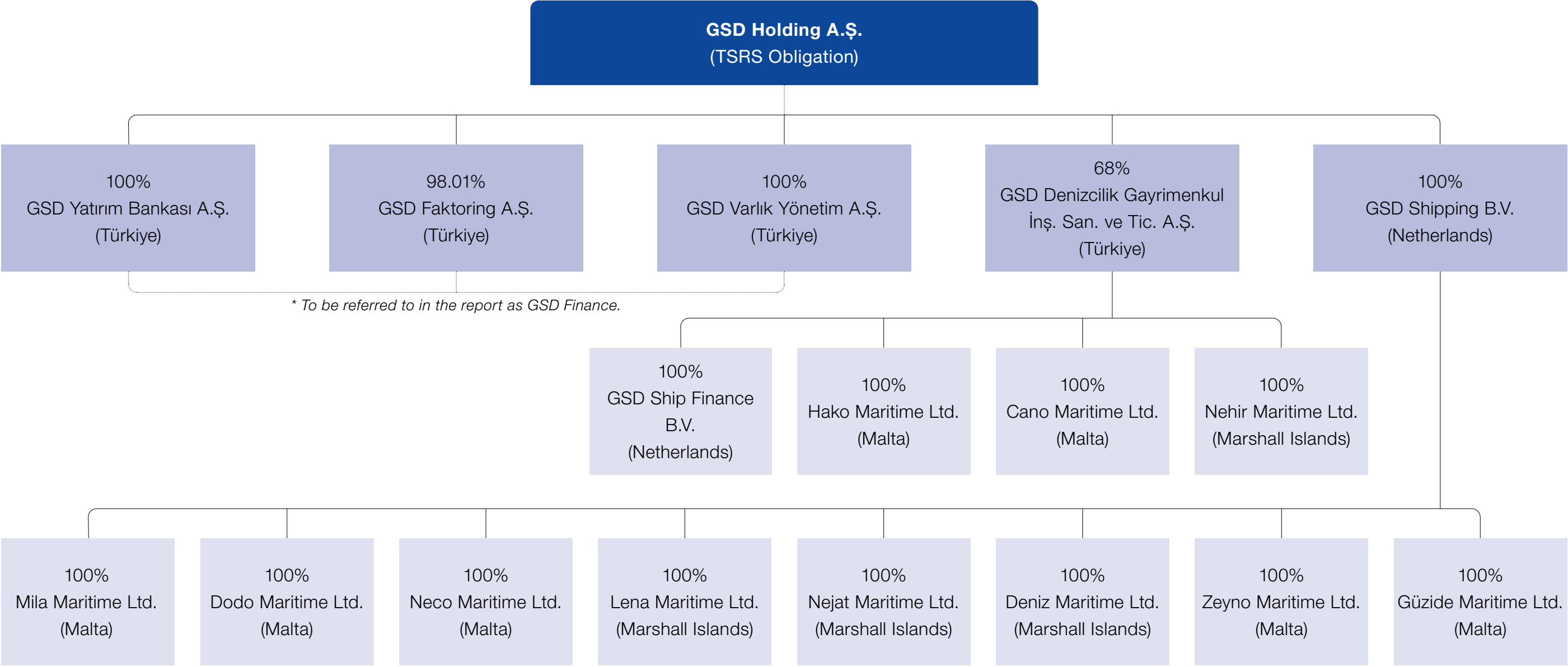
This report aims to present consolidated information on sustainability related risks and opportunities within the scope of the Türkiye Sustainability Reporting Standards (TSRS) specifically, TSRS 1: General Requirements for Disclosure of Sustainability Related Financial Information and TSRS 2: Climate Related Disclosures. The report provides information useful for the primary users of general-purpose financial reports when making decisions regarding the allocation of resources to the company. Prepared in compliance with the Türkiye Sustainability Reporting Standards, the report presents key information on the Group’s environmental, social, and governance (ESG) practices.

2.2. Scope

The report covers the financial reporting period from January 1 to December 31, 2024, and has been prepared in accordance with TSRS 1 and TSRS 2, which are issued by the Public Oversight, Accounting and Auditing Standards Authority (KGK) of Türkiye and based on the international standards developed by the International Sustainability Standards Board (ISSB). Sustainability related risks and opportunities that are not expected to have a material impact on the future financial viability of the companies have been excluded from the scope of this report.

2.3. Parent Company & Subsidiaries

According to TSRS 1 – Conceptual Foundations, Reporting Entity, Paragraph 20 and the directly related TSRS 1, Appendix B – Implementation Guidance, Paragraph B38, entities subject to TSRS reporting obligations are required to disclose information regarding the parent company and its subsidiaries as a single reporting entity. Therefore, for the 2024 reporting year, GSD Holding A.Ş. has prepared this report in alignment with its consolidated financial statements when disclosing information on sustainability and climate-related matters. To better understand this reporting hierarchy, the structure of GSD Group, including the parent company, subsidiaries, and shareholding ratios, is presented below.



The subsidiaries operating under GSD Holding and covered in this report include GSD Yatırım Bankası A.Ş., GSD Faktoring A.Ş., GSD Varlık Yönetim A.Ş., GSD Denizcilik Gayrimenkul İnş. San. ve Tic. A.Ş. and its subsidiaries, as well as GSD Shipping B.V. and its subsidiaries. Collectively, these entities are referred to as the Group throughout the report.

GSD GROUP

- Direct subsidiaries
- Indirect subsidiaries

2.4. Compliance with Türkiye Sustainability Reporting Standards (TSRS)

Türkiye Sustainability Reporting Standards (TSRS), published in the Official Gazette No. 32413 dated December 29, 2023, entered into force to be applied for fiscal periods beginning on or after January 1, 2024. These standards were issued by the Public Oversight, Accounting and Auditing Standards Authority (KGK).

As a company subject to the regulations and supervision of the Capital Markets Board of Türkiye (CMB), GSD Holding A.Ş. is obliged to prepare a sustainability report in accordance with TSRS framework, having exceeded at least two of the specified thresholds (such as financial size and number of employees) in two consecutive reporting periods.

Accordingly, this report has been prepared primarily in line with TSRS 1: General Requirements for Disclosure of Sustainability Related Financial Information and TSRS 2: Climate Related Disclosures, while also utilizing the sectoral implementation guides TSRS 2 – Supplementary Volume 16: Commercial Banks and TSRS 2 – Supplementary Volume 66: Maritime Transport.

The report is presented on a consolidated basis, covering GSD Holding's main business segments, the financial sector (banking, factoring, and asset management) and the maritime sector in which it operates through its subsidiaries.

In line with the relevant provisions of TSRS 1, standards published by the International Sustainability Standards Board (ISSB) and the sector specific metrics and guidance developed by the Sustainability Accounting Standards Board (SASB) have been considered, although not applied directly. However, areas where the SASB Standards and TSRS provisions align particularly in the classification of environmental, social, and governance (ESG) topics, disclosure format, differentiation of metric types, and topic-based reporting approach have been utilized. In addition, thematic areas such as GHG Emissions and Energy Management were referenced.

Among the disclosures and metrics recommended in the aforementioned sectoral guidance, topics such as financial inclusion, environmental and social credit risk management, climate related portfolio risk, corporate governance structure, data security, and workforce diversity have been addressed in this report, and relevant indicators have been provided where measurable.

Furthermore, in accordance with the Sector Based Application Guidance of TSRS 2, necessary assessments have been carried out for the identification, measurement, and disclosure of climate related risks across the various operational areas of GSD Holding's subsidiaries. In these evaluations, sectoral diversity among the subsidiaries was taken into consideration when certain metrics were included within the reporting scope, while others were excluded as they were not directly related to the material sustainability and climate change risks and opportunities disclosed in this report.

This first TSRS compliant report of GSD Holding lays the groundwork for developing the company's sustainability and climate data management infrastructure in the coming periods and establishes a foundation for a more comprehensive, comparable, and transparent sustainability reporting process.

GSD Holding presents this report which demonstrates full, explicit, and unconditional compliance with all provisions of the Türkiye Sustainability Reporting Standards for the consideration of its financial report users.

2.5. Financial Disclosures

This sustainability report has been prepared in alignment with the financial reporting process of GSD Holding A.Ş. for the fiscal period January 1, 2024 – December 31, 2024. The sustainability and climate related disclosures presented in this report are structured consistently with the Group’s consolidated financial statements and accompanying notes for the same reporting period. This approach has been adopted to enable stakeholders to assess both financial and non-financial information in an integrated manner. All monetary values and calculations presented in this report are expressed in Turkish Lira (TRY).

In accordance with the framework of International Sustainability Standards Board (ISSB), which forms the basis of the Türkiye Sustainability Reporting Standards (TSRS), the disclosures in this report consider the potential impacts of sustainability and climate change issues on the company’s financial performance, position, and cash flows. Accordingly, elements such as the effects of climate related physical and transition risks on GSD Holding’s portfolio and business areas, and the contribution of environmental, social, and governance (ESG) factors to the Group’s long term value creation capacity, have been evaluated in relation to their financial implications.

Within this context, GSD Holding has disclosed topics expected under TSRS 1 and TSRS 2 that are directly or indirectly related to financial outcomes, for example, the impact of climate change on credit risk and the effect of energy consumption on operational costs.

Since certain sustainability and climate related metrics disclosed in this report (e.g., emission intensity, total energy consumption ratio) may not be directly comparable with financial statement data, the methodologies and assumptions applied in evaluating these metrics are explicitly explained in the relevant sections.

The Group’s sustainability and climate change strategy is based not only on managing environmental and social impacts but also on ensuring the sustainability of its financial performance. In this regard, the integration of sustainability and climate related risks and opportunities into the financial reporting process aims to provide investors and other stakeholders with a more transparent, decision-useful, and reliable set of information.

The interrelationship between financial statements and sustainability or climate related disclosures is managed in compliance with TSRS and integrated into the Group’s corporate risk management and internal control systems. This holistic approach is regarded as an essential component of both managing future uncertainties and supporting long term strategic planning.

GSD Holding defines short, medium and long term time horizons in an integrated manner within its strategic planning processes to effectively manage sustainability and climate related risks and opportunities and to create long term value. These timeframes are structured based on multi-dimensional financial and operational criteria, including the typical planning cycles of the sectors in which subsidiaries operate, cash flow and investment planning, capital allocation policies, and the expectations of financial report users.

Time Horizons		
Short Term	0-1 year	This period is directly linked to the company’s annual budgeting and financial planning processes, enabling rapid adaptation to regulatory changes and operational needs in the field of sustainability. Moreover, defining short term goals contributes to building a progressive pathway aligned with long term transformation objectives.
Medium Term	1-3 years	This period ensures strong alignment between the organization’s sustainability strategy and its business strategy planning and revision cycles. Medium term planning allows the company to prepare for sectoral transformation processes and to integrate strategic priorities with sustainability goals. This approach supports the preservation of long term competitive advantage and enhances organizational resilience against changing conditions.
Long Term	3+ years	This period is approached with an evolving perspective aligned with climate change, global sustainability commitments, and regulatory frameworks, enabling the Group to develop strategies that enhance long-term resilience by anticipating macro trends. It also marks a transformation phase in which non-financial indicators are increasingly prioritized, and corporate performance is evaluated not only through financial metrics but also through environmental and social dimensions.

2.6. Transition Phase

With the entry into force of Türkiye Sustainability Reporting Standards (TSRS) on January 1, 2024, GSD Holding entered a new era in sustainability reporting. This report represents GSD Holding's first sustainability report prepared in compliance with TSRS, and as such, includes certain key transitional practices and areas for improvement specific to the transition period. During this process, the main disclosure requirements set forth in TSRS 1 and TSRS 2 were taken into account, and the existing data infrastructure was reviewed as an initial step. In particular, methodological approaches related to the identification, measurement, and disclosure of climate related risks and opportunities, as well as disclosures concerning governance and strategy, were systematically structured for the first time within this report.

The following aspects were considered during the transition period:

- All disclosure requirements under TSRS 1 and TSRS 2 were addressed to the greatest possible extent in this first year of implementation; however, limited historical comparability was possible for some metrics and datasets. Explanations regarding these limitations are provided in the relevant sections.
- Since certain sustainability indicators were not periodically monitored in previous years, these indicators are presented only for the year 2024 in this first report.

- To enhance the reliability of non-financial data, internal audit and relevant operational departments jointly initiated control processes for sustainability data.
- Standardization efforts were undertaken during the transition period to facilitate the collection of sustainability data from subsidiaries and their integration into centralized systems.

The mandatory adoption of sustainability reporting under TSRS has enabled GSD Holding to adopt an integrated approach to its corporate reporting processes. Accordingly, sustainability information has been structured to align with the financial statements and to support investors' decision-making processes.

Pursuant to Articles E3, E4, E5, and E6 of TSRS 1 and Articles C3, C4, and C5 of TSRS 2, certain transition exemptions are permitted. The transition exemptions applied by GSD Holding are as follows:

- In its first annual reporting period, the entity is permitted to disclose only information related to climate-related risks and opportunities (as per TSRS 2) and to apply the requirements of TSRS 1 only in so far as they relate to such disclosures. Accordingly, GSD Holding has considered only climate-related risks and opportunities in the preparation of this report. However, information concerning governance, strategy, and risk management covers all sustainability topics, including climate-related matters.

- If, during the annual reporting period immediately preceding the effective date of the standard, an entity measured its greenhouse gas emissions using a methodology other than Greenhouse Gas Protocol: Corporate Accounting and Reporting Standard (2004), it is permitted to continue using that methodology. GSD Holding calculates and reports its greenhouse gas emissions in accordance with the ISO 14064-1 Standard. Therefore, the GHG values presented in this report are based on ISO 14064-1 methodology rather than the GHG Protocol required by TSRS.

- Making use of the transition exemption, this report does not include climate-related financial disclosures for previous years.

- During the first reporting period, GSD Holding has been temporarily exempted from the obligation to disclose all Scope 3 emissions. Within this scope:

- **C4(a):** Flexibility has been applied to facilitate the transition of measurement methodologies.
- **C4(b):** The obligation to disclose financed emissions within financial subsidiaries (investment banking, factoring, and asset management activities) has not been applied in this first reporting period. However, in subsequent periods, data related to Scope 3 and financed emissions will be reported in alignment with international standards.

Under the transition exemption, the provision allowing entities to publish their sustainability and climate-related financial

disclosures after issuing their corresponding financial statements during the first annual reporting period in which the standard is applied, as well as the provision allowing up to nine months from the end of that reporting period for such disclosures, have been applied.

According to the Board Decision No. 34548 dated July 31, 2025, the deadline for publishing TSRS-compliant sustainability reports for the 2024 fiscal year has been extended to October 31, 2025.

A roadmap for improving data collection and reporting processes specific to the transition period has been prepared. This roadmap will be implemented in 2025 and subsequent reporting periods with the objective of enhancing both the scope and quality of sustainability reporting.

2.7. Measurement Uncertainty

The unpredictability of variables considered in hypothetical calculations leads to measurement uncertainty in financial impact analyses. The frequency and scope of such situations cannot be fully estimated based on historical data, while variations in items such as revenue and expense differences, market conditions, insurance costs, and operational expenditures inherently involve a degree of uncertainty.

Therefore, GSD Holding conducts its financial impact analyses within the limits of available data and scenario-based projections and does not disclose a definitive numerical financial impact for this year. In future periods, as data quality improves and the regulatory framework becomes clearer, the aim is to reduce measurement uncertainties and provide more realistic estimates of financial impacts.

2.8. Reporting Boundaries

GSD Holding's first sustainability report prepared in compliance with Türkiye Sustainability Reporting Standards (TSRS) covers the period from January 1, 2024 to December 31, 2024, which coincides with the Company's annual financial reporting period.

In line with the principles set forth in TSRS 1 and TSRS 2, sustainability and climate-related data and disclosures are presented on an annual basis. Developments, performance indicators, strategic priorities, and objectives related to the reporting period have been assessed within this timeframe. The processes of data collection, verification, and reporting were carried out following the completion of the 2024 fiscal year through a coordinated data gathering system involving the relevant departments of the Group. In addition, significant developments that occurred after the reporting period have been included in the notes or explanatory texts where applicable.

GSD Holding is committed to publishing its sustainability report on an annual basis, regularly updating it as a permanent component of its corporate transparency and accountability framework. Accordingly, the scope, metric set, and depth of disclosures will be expanded in future years in line with the company's evolving sustainability and climate change strategy and data management systems.

This sustainability report covers the sustainability activities, strategies, risk management practices, governance structures, and environmental and social performance indicators of GSD Holding, and its subsidiaries under its control. When defining the reporting boundaries, the control-based approach used in financial consolidation was adopted, and all subsidiaries directly or indirectly controlled by GSD Holding were included within this scope.

The legal entities included in the report have been selected based on their business volume, financial contribution, and impact on sustainability matters. Accordingly, the activities of GSD Holding in different sectors primarily finance (banking, factoring, and asset management) and maritime have been integrated into the report, taking into consideration their positions within the value chain.

** As the shares held in Silopi Elektrik A.Ş. were sold as of January 2025, the company has not been included within the scope of this report.*

2.9. Materiality Assessment

As GSD Holding, the principle of materiality serves as the foundation of our sustainability reporting. Within the framework of Türkiye Sustainability Reporting Standards (TSRS 1 and TSRS 2), we identify both the climate-related risks and opportunities that may affect our financial performance and the issues that are of critical importance to our stakeholders.

Within the Group’s main areas of activity, the potential impacts of climate-related risks and opportunities on financial performance are analyzed. Accordingly, risks and opportunities assessed above a specific financial threshold are prioritized in our reporting.

Assessments conducted under different climate scenarios reveal the transition and physical risks that may affect the Group’s operations over the long term. These analyses are used to enhance the resilience of our business model and strengthen our sustainable growth strategies.

In the financial materiality assessment, 1% of shareholders’ equity has been defined as the materiality threshold. Equity was chosen as the basis since it directly reflects the organization’s financial soundness and stakeholder value. The 1% threshold enables the identification of risks and opportunities large enough to generate a meaningful change in the organization’s financial position (for example, an impact of 0.01 TRY per 1 TRY of equity).

Impact Potential	Effect on Equity	Impact (TRY)
Low	0 – 0.1%	0 – 10.232.818
Medium	0.1 – 1%	10.232.818 – 102.328.180
High	>1%	102.328.180

3. Governance

3.1. Sustainability Management Structure

As GSD Holding, the Board of Directors holds the ultimate responsibility for sustainability management. The Chief Executive Officer (CEO) assumes the executive and operational leadership role in this regard. Within the Board, the Early Detection of Risk Committee (EDRC) serves as the key corporate body responsible for overseeing sustainability strategies and monitoring climate-related risk management processes.

The Committee is tasked with evaluating and submitting to the Board the sustainability strategies, policies, and targets aligned with GSD Holding's short, medium, and long-term strategic objectives. In this context, the Board of Directors plays an active role in decision-making processes related to climate change, environmental impacts, and sustainable finance.

The Early Detection of Risk Committee (EDRC) convenes to identify and manage in a timely manner the strategic, operational, and financial sustainability risks that could affect GSD Holding's activities. The Committee regularly presents systematic risk assessment reports to the Board of Directors, which serve as key inputs guiding the Group's overall corporate strategy.

GSD Holding's decarbonization roadmap has been developed under the leadership of the Board of Directors, with the contribution of the sustainability team and relevant subsidiaries. The guidance provided by the EDRC on the following technical matters played a significant role in the preparation of this roadmap:

- Evaluation of carbon footprint data specific to the maritime and finance sectors,
- Analysis of transition and physical risks related to climate change,
- Assessment of energy efficiency, fuel optimization, and renewable energy utilization potential,
- Integration of sustainable finance criteria into the business model.

Through this governance structure, sustainability at GSD Holding has been established not only as an operational function but also as a strategic governance element at the Board level.

3.2. Governance Roles and Responsibilities

3.2.1. Board of Directors

The Board of Directors of GSD Holding is the highest governance body responsible for overseeing the company's sustainability strategy and risk management processes. This responsibility covers not only sustainability-related risks and opportunities but also the comprehensive evaluation of all strategic issues in the fields of environmental, social, and governance (ESG) performance.

The Early Detection of Risk Committee (EDRC), operating under the Board of Directors, serves as the primary corporate body providing strategic guidance to the Board on sustainability matters. The Committee is responsible for identifying, assessing, and reporting all strategic, financial, operational, and climate-related risks and opportunities arising from GSD Holding's various lines of business.

Based on a resolution adopted by the Board of Directors, the Sustainability Committee was established in 2025 to ensure the more effective and coordinated implementation of sustainability initiatives. This Committee actively engages in defining sustainability strategies, monitoring environmental and social performance, implementing relevant policies, and managing stakeholder expectations.

Working in coordination with the EDRC, the Sustainability Committee contributes to the integration of the corporate sustainability approach across all areas of the Group's operations.

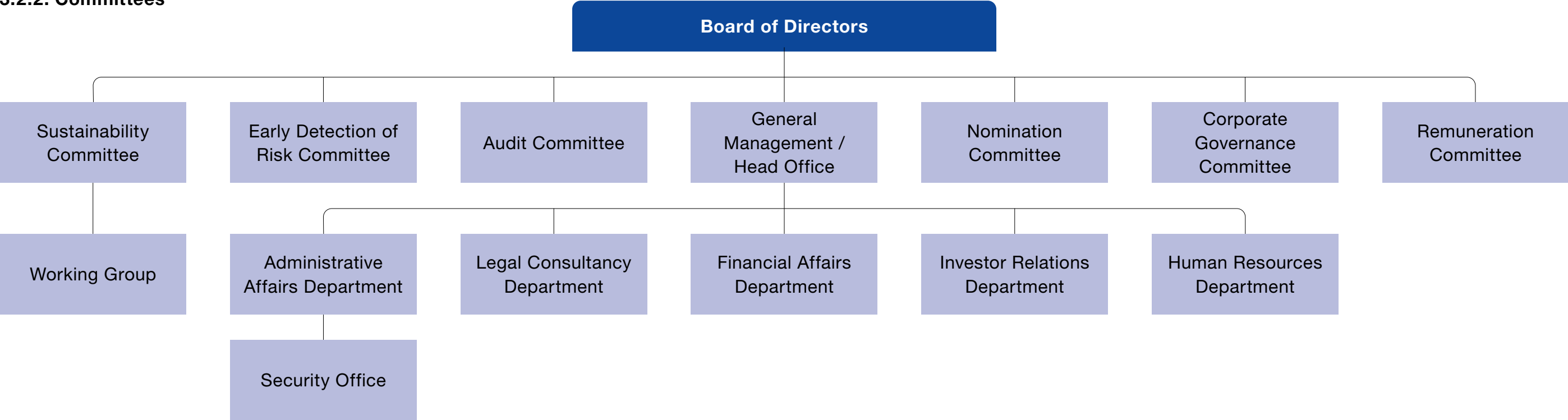
As this is the first reporting year, and since the Sustainability Committee was established at the beginning of 2025, climate-related matters were not included in executive remuneration policies during the 2024 reporting period. In this regard, pursuant to TSRS 2 Article 6(a)(v), there are currently no practices in place regarding whether and how climate-related considerations are incorporated into executive pay.

Furthermore, in accordance with TSRS 2 Article 6(c), no portion of senior executives' remuneration during the reporting period was linked to climate-related performance indicators.

However, as specified in TSRS 1 Article 51, the process of setting and monitoring targets related to sustainability risks and opportunities and overseeing these targets by governance bodies will be carried out by the Sustainability Committee starting from 2025.

In subsequent reporting periods, GSD Holding plans to link sustainability targets with financial performance indicators and to integrate climate-related performance metrics into executive remuneration policies. Accordingly, in future years, the extent to which executives achieve climate-related targets will be regularly monitored and reflected in remuneration processes.

3.2.2. Committees



3.2.2.1. Sustainability Committee

GSD Holding has adopted a corporate governance model structured to integrate its sustainability strategy across all business operations and to embed environmental, social, and governance (ESG) considerations into corporate decision-making processes. Within this framework, sustainability efforts were carried out by the Early Detection of Risk Committee (EDRC) during 2024. The Sustainability Committee, established in 2025 with the approval of the Board of Directors, operates directly under the Board.

Purpose and Scope of the Sustainability Committee

The primary purpose of the Committee is to define the sustainability strategies of GSD Holding and its subsidiaries, establish sustainability-related policies and targets, implement, monitor, and audit these actions, make improvements when necessary, and regularly inform the Board of Directors on progress. Through this structure, sustainability is intended to become a corporate responsibility shared across all stakeholders.

Duties and Responsibilities of the Committee

In line with the governance disclosure requirements of TSRS, the Committee’s mandate includes the following core functions:

- Preparing the Group’s sustainability strategy and roadmap
- Systematically identifying, monitoring, and managing environmental, social, and governance (ESG) risks and opportunities

- Identifying and assessing climate and sustainability related risks and opportunities, and evaluating their potential financial impacts
- Monitoring national and international sustainability developments and assessing stakeholder expectations
- Defining sustainability targets and submitting them for Board approval
- Reviewing, evaluating, and continuously improving policies, practices, management systems, and reporting processes
- Conducting internal awareness and capacity building activities to ensure that sustainability is embraced by all employees
- Establishing, authorizing, and coordinating the working group under the Committee
- Monitoring the implementation of Committee decisions and reporting results to the Board of Directors annually.

Structure and Secretariat of the Committee

- The Committee consists of the following three members:

Position in the Holding	Role in the Committee
Vice Chairman of the Board of Directors	Chairperson
Deputy General Manager of Financial Affairs	Member
Investor Relations Manager	Member / Secretariat

- The organization of Committee meetings, preparation of meeting minutes, and coordination activities are carried out by the Investor Relations Manager.
- The Committee convenes at least once a year and additionally as needed. Decisions are taken by majority vote; in the event of a tie, the Chairperson’s vote counts as two. The Committee may seek assistance from experts or external institutions when deemed necessary.

Working Group Structure and Responsibilities

A Working Group formed under the Committee consists of managers and departmental representatives with expertise in sustainability. The Group operates to implement Committee decisions and provide technical support to the Committee. Its structure is defined as follows:

- **For the Maritime Sector:** Deputy General Manager of Operations and Chartering
- **For the Finance Sector:** Risk Management Manager, Internal Control / Internal Audit Manager
- **For All Operational Areas:** Human Resources Manager
- **Working Group Coordinator:** Investor Relations Manager

The Working Group may obtain information and support from various departments within subsidiaries when necessary. The manager responsible of the group is tasked with preparing meeting minutes, ensuring that outputs are reported to the Committee, and coordinating all related activities.

Relationship with the Board of Directors

Sustainability Committee reports its activities, decisions, and monitoring results to the Board of Directors once a year. Decisions that guide GSD Holding’s sustainability strategy progress under the direct approval of the Board.

Through this governance structure, sustainability has been institutionalized as one of GSD Holding’s strategic priorities. The Board of Directors’ responsibilities regarding sustainability can be summarized under the following categories:

- **Strategic Direction:** Defining sustainability policies, climate change mitigation strategies, and corporate objectives.
- **Oversight and Approval:** Reviewing and approving the sustainability report prepared in accordance with TSRS, along with key environmental and social risk analyses.
- **Transparent Stakeholder Communication:** Ensuring the integrity of corporate transparency, investor relations, and sustainability reporting processes.

To enhance the Board’s understanding of sustainability matters, periodic training and information sessions on TSRS, ESG risk management, and climate scenario analysis are planned for Board members.

3.2.2.2. Early Detection of Risk Committee

Early Detection of Risk Committee (EDRC) conducts studies to identify, assess, and manage risks that may endanger the

existence, development, and continuity of the Company. The Committee ensures that necessary measures are implemented to address identified risks and reviews the risk management systems at least once a year.

At the end of each quarter, the Committee prepares four separate reports on both a solo and consolidated basis, evaluating the Company’s overall risk status. These reports highlight potential threats, propose remedial actions, and are submitted to the Board of Directors and shared with the independent auditor.

Internal Audit

The risk management system established by Early Detection of Risk Committee operates effectively through a division of duties and processes among the General Manager of GSD Holding, the Financial Affairs Department, and the supporting departments of GSD Yatırım Bankası A.Ş., namely the Treasury Department and the Information Technologies Department, from which service support is obtained.

Within the financial sector subsidiaries, which constitute a significant portion of GSD Holding’s consolidated assets, there are established risk management, internal audit, and internal control units in compliance with applicable laws and regulations. Specifically, GSD Yatırım Bankası A.Ş. has dedicated risk management, internal audit, and internal control departments; GSD Faktoring A.Ş. maintains internal control and

risk monitoring functions; and GSD Varlık Yönetim A.Ş. operates with active internal control and risk management units.

3.2.2.3. Asset-Liability Committee (ALCO)

The Asset-Liability Committee (ALCO) of GSD Yatırım Bankası A.Ş. meets regularly every Monday under the chairmanship of the General Manager, with the participation of the Deputy General Manager of Treasury and Fund Management, the Head of the Credit Group, the Head of the Information Technologies Group, the Heads of Marketing Groups, and the Head of the Operations and Financial Reporting Group.

The Committee contributes to strategic decision-making by evaluating general economic and financial developments, bank liquidity, weekly and monthly profit/loss figures, and policy targets, while also taking into account climate related market risks, interest rate, and foreign exchange risks as part of broader environmental financial risk considerations.

Decisions concerning risk management strategies and policies, the determination of position limits, and the setting of quotation rates are addressed in these meetings from an integrated perspective.

Additionally, through the ALCO meetings, sustainability objectives are coordinated across business units, ensuring that environmental impacts are integrated into financial planning.

3.2.2.4. Risk Monitoring Committee

Risk Monitoring Committee was established to monitor and manage risks that may arise from the Bank’s credit portfolio. The Committee convenes under the chairmanship of the General Manager, with the participation of the Credit and Credit Risk Monitoring units.

Within the Committee, intelligence information is shared, and risk scoring is conducted in line with ESG focused assessment criteria, such as the environmental and social performance of portfolio companies, sectoral sustainability risks, and the environmental adequacy of collaterals. Issues and evaluations related to the credit portfolio are addressed transparently through internal processes and reflected in decision making procedures. This comprehensive assessment framework covers both traditional credit risks and risks arising from climate change, environmental regulations, and sustainable finance criteria.

3.2.2.5. ICAAP Committee

ICAAP Committee (Internal Capital Adequacy Assessment Process) was established to ensure the long-term financial resilience of GSD Yatırım Bankası A.Ş.. The Committee meets, at a minimum, annually at the end of year under the chairmanship of the General Manager, with the participation of the Deputy General Manager of Treasury and Fund Management, and the Heads of Credit, Information Technologies, Marketing, Operations and Financial Reporting

Groups, and the Deputy Head of the Risk Management Department.

The main function of the Committee is to anticipate and manage the Bank’s internal capital requirements in accordance with the Internal Capital Adequacy Assessment Process (ICAAP), considering the nature of its activities, the risks it is exposed to, and its strategic objectives. In this context, the Committee determines the scope, methodology, and implementation process of ICAAP, models the required capital buffer based on financial and macroeconomic scenarios, and presents these calculations to the Audit Committee for discussion.

The Committee’s work extends beyond ensuring regulatory compliance; it aims to evaluate the Bank’s resilience against economic cycles, stress scenarios, and external shocks. The potential effects of macroeconomic variables on the Bank’s performance are comprehensively analyzed, and strategic action proposals are developed and presented to senior management based on these analyses.

In this respect, the ICAAP Committee functions not only as a technical evaluation body but also as a high-level governance mechanism that guides corporate capital planning, integrates with strategic risk management, and contributes to long term sustainable growth.

3.3. GSD Holding Organizational Structure and Value Chain

As of 2024, GSD Holding’s organizational structure is focused on the finance and maritime sectors and operates through an integrated business model. The Group’s investments in the financial sector are carried out through GSD Yatırım Bankası A.Ş., GSD Faktoring A.Ş., and GSD Varlık Yönetim A.Ş..

GSD Yatırım Bankası A.Ş. is an investment bank offering a range of products and services in the field of commercial banking, serving corporate and commercial clients. GSD Faktoring A.Ş. provides domestic and international clients with guarantee, collection, and financing services through the assignment of receivables, and contributes to reducing international risks by offering credit intelligence and guarantee services within the scope of export factoring. GSD Varlık Yönetim A.Ş., which commenced operations in September 2024, manages non-performing loans acquired from financial institutions and specializes in debt restructuring, collection management, and solution-oriented debtor relations.

GSD Holding conducts its maritime operations through GSD Denizcilik Gayrimenkul İnş. San. ve Tic. A.Ş. and GSD Shipping B.V. As of 2024, the fleet consists of nine dry bulk vessels (M/V Cano, M/V Dodo, M/V Hako, M/V Deniz, M/V Olivia, M/V Mila, M/V Lena, M/V Nejat, and M/V Nehir), actively operating in the maritime transportation sector.

With its strong financial structure, disciplined risk management approach, and sectoral expertise, GSD Holding aims to create sustainable value for both Turkish economy and its stakeholders. While the subsidiaries within GSD Holding structure maintain their operational autonomy, they operate in line with the Holding’s centralized strategy, risk management, and sustainability policies, in accordance with the principles of corporate governance.

Under the value chain approach, the impact area of GSD Holding extends beyond its own operations to include the entire network of economic and social relationships formed by its subsidiaries and business partners. Financing, service delivery, human resource management, technological infrastructure, customer satisfaction, and social responsibility practices constitute the core elements of this value chain.

3.4. GSD Holding’s Business Model and Value Chain

GSD Holding’s business model is based on a multi-sector investment approach that combines strategic capital allocation with effective risk management to create long term sustainable value. While generating value across its operating sectors, GSD Holding also regards environmental, social, and governance (ESG) responsibilities as an integral part of its business processes.

Core Elements of the Business Model

a) Capital Allocation and Value-Oriented Investment

Operating in the fields of financial services and maritime transport, GSD Holding takes into account strategic alignment, long term value potential, sustainability, and climate impacts when making capital allocation decisions.

b) Strategic Governance and Centralized Policy Framework

Although GSD Holding does not exercise direct operational control over its subsidiaries, it plays a guiding role in terms of strategic decision frameworks, internal control systems, sustainability objectives, ethical principles, and risk management policies.

c) Stakeholder Value and Transparency

Stakeholder engagement, accountability, and sustainable communication form the core pillars of the business model. As a company listed on Borsa Istanbul, GSD Holding adopts a value-creation approach that is not only compliant with regulatory expectations but also oriented toward the interests of investors, customers, and society.

Value Chain Perspective

Within the sustainability reporting framework defined by TSRS 1 and TSRS 2, GSD Holding’s value chain consists of the following key components:

Inputs	Core Activities	Outputs	Impacts and Added Value
- Financial capital (equity) - Qualified human resources - Digital infrastructure and information systems - Stakeholder relations and corporate reputation	- Provision of financial services (banking, factoring, asset management) - International maritime transportation (dry bulk shipping) - Risk management, internal audit, and financial reporting - Corporate governance and ethical management processes	- Generation of financial value (sustainable profitability, strong equity structure) - Stakeholder satisfaction and investor confidence - Improvement of environmental performance (particularly fuel efficiency and emission control in maritime operations) - Contribution to society and social responsibility (educational support and activities of GSD Eğitim Vakfı)	- A transparent financial structure that strengthens confidence in capital markets - Solutions that support the real sector’s access to finance - Maritime transportation policies with a low environmental footprint - Social projects that help reduce inequalities and promote inclusive development

GSD Holding’s value chain has been defined to extend beyond the companies under its direct control, encompassing the entire network of interactions with suppliers, customers, employees, investors, and society. Within the framework of TSRS standards, performance indicators have been structured to cover both internal operations and the impacts generated throughout the value chain.

Reflections of the Value Chain Approach within the Scope of Sustainability

Within the framework of TSRS 1 and TSRS 2, GSD Holding has adopted a value chain approach that goes beyond its own operations, encompassing all subsidiaries as well as both upstream and downstream impact areas.

In this context:

- Human rights, ethical procurement, transparency, and climate risk management principles are implemented throughout the entire value chain.
- Geographically, in addition to operational centers concentrated in Türkiye, Company’s international dry bulk shipping operations conducted through its fleet registered under the flags of Malta and the Marshall Islands via the Netherlands require the assessment of environmental and governance risks on a global scale.

Upstream and Downstream Flow Analysis

Upstream Flow – Procurement and Input Stages

- **Suppliers:** National and international providers of software, financial system infrastructure, ship technical equipment, agency services, and consultancy.

- **Financial Resource Providers:** Domestic and foreign banks, investment funds, and private equity firms.
- **Labor and Service Providers:** Local organizations offering education, human resources, maintenance/repair, legal, audit, and consultancy services.

Downstream Flow – Customer and Impact Stages

- **Financial Services Clients:** National and international corporate and commercial clients, SMEs, and exporters (through GSD Yatırım Bankası A.Ş., GSD Faktoring A.Ş., and GSD Varlık Yönetim A.Ş.).
- **Ship Charterers and Insurance Companies:** Global firms engaged in dry bulk transportation.
- **Investors:** Domestic and foreign investors holding shares traded on Borsa Istanbul (BIST).
- **Society:** Local communities in regions where employment is created, and groups benefiting from social responsibility projects.

3.5. Material Topics and Prioritization

GSD Holding identifies material topics covering all its subsidiaries and analyzes their levels of priority. These priority levels are regularly assessed through impact - likelihood evaluations of key risk areas. The priority degrees of critical risks are determined by considering not only their potential effects on profitability and capital, but also the financial impacts of carbon-related transition regulations and stakeholder expectations across the value chain. Within this scope, the potential financial impacts associated with each priority level are also evaluated, forming a guiding framework for GSD Holding’s processes of risk and opportunity prioritization.

Topic Title	Category	Financial Impact	Stakeholder Expectation	Priority Level
Climate Change and Carbon Management	Environmental	High	High	High
Corporate Governance and Ethics	Governance	Low	High	Medium
Sustainable Finance and Green Products	Economic	High	Medium	High
Maritime Emissions and Energy Efficiency	Environmental	Medium	Medium	Medium
Data Security and Cyber Risks	Social / Governance	Medium	Medium	Medium
Supply Chain Sustainability	Environmental	Medium	High	High
Resilience to Physical Climate Risks	Environmental	High	Medium	High

3.6. Risk Strategy

As GSD Holding, the foundation of our sustainability strategy lies in understanding and effectively managing the environmental, social, and governance (ESG) factors that influence the company’s long term financial stability, operational performance, and cash flows.

Accordingly, the identification, prioritization, and management of sustainability and climate related risks and opportunities are guided by the following key frameworks:

- Türkiye Sustainability Reporting Standards (TSRS)
- Task Force on Climate-related Financial Disclosures (TCFD)

TSRS framework enables the establishment of a direct link between sustainability topics and their financial impacts, providing a comprehensive analytical basis for assessing future financial resilience and risk capacity.

The TCFD principles, on the other hand, ensure a systematic evaluation of the current and anticipated impacts of climate-related risks and opportunities on GSD Holding’s business model and value chain, facilitate scenario analyses, and integrate climate risks into strategic decision-making processes.

Within this scope:

- Across all operating areas (financial services and maritime), sustainability related risks and opportunities that could affect GSD Holding’s financial soundness and reputation are systematically assessed and monitored.
- Identified ESG and climate change related risks and opportunities are analyzed together with their current and future impacts on GSD Holding’s business model, value chain, and geographic operations, as well as in connection with regulatory and market developments.
- Based on these analyses, the company evaluates how these factors shape its strategic direction, resource planning, and decision making mechanisms, and develops a sustainable growth vision by considering short, medium, and long term impacts.
- The risk identification process begins with unit based assessment meetings, internal stakeholder surveys, and external stakeholder analyses. The identified risks are prioritized and included in the risk assessment matrix based on their impact on operations, stakeholder sensitivity, and relationship with climate factors.
- For each risk or opportunity, the FMEA (Failure Modes and Effects Analysis) methodology is applied to calculate probability of occurrence, severity level, and detectability coefficient, forming a risk/opportunity score. Based on this scoring, critical risks are prioritized, and risk mitigation action plans are developed.

3.7. Climate-Related Risks and Opportunities

Within GSD Holding, the management of all corporate risks and opportunities is carried out through a systematic and integrated approach based on clearly defined procedures. For each identified risk and opportunity, probability and impact levels are carefully analyzed, and the resulting risk and opportunity scores are compared against predefined threshold values. Risks and opportunities that meet or exceed these thresholds are prioritized and integrated into the relevant action plans.

In this framework, risks and opportunities related to sustainability and climate change are also included, ensuring that the uncertainties and impacts in these areas are effectively reflected in GSD Holding’s strategic decision making processes. Consequently, all categories of risks and opportunities including environmental, social, and governance (ESG) factors are managed within a consistent and comparable evaluation framework.

In line with sustainability and climate adaptation strategies, the defined goals are structured across short, medium, and long term time horizons. These timeframes serve as a foundation for prioritization and resource allocation processes, enabling effective management of climate related risks and the evaluation of potential opportunities.

The progress of the targets is regularly monitored based on the magnitude of their strategic impact and implementation timeline, ensuring that risks are mitigated and opportunities are maximized within the defined time frame.

At the current stage, climate related risks have no direct impact that would require a material adjustment to the carrying value of the Group’s financial assets or liabilities.

	GSD Yatırım Bankası A.Ş.	GSD Faktoring A.Ş.	GSD Varlık Yönetim A.Ş.	GSD Shipping B.V.	GSD Denizcilik Gayrimenkul İnş. San. ve Tic. A.Ş.
Risk 1 – Liquidity Risk	√	√	√	-	-
Risk 2 – Credit Risk	√	√	√	-	-
Risk 3 – Acute Risk	-	-	-	√	√
Risk 4 – Greenhouse Gas Emissions	-	-	-	√	√
Opportunity 1 – Transition to a Low-Carbon Economy	-	-	√	-	-
Opportunity 2 – Energy-Efficient Fleet Advantage	-	-	-	√	√

Risk 1: Liquidity Risk

Risk Category	Economic & Governance Risk					
Risk Description	Liquidity risk refers to the potential imbalance in cash flow arising from regulatory measures such as carbon pricing mechanisms or green finance criteria that may be introduced under Climate Law. This occurs when a company does not have sufficient cash reserves or inflows to meet its cash outflows fully and on time. With the enforcement of Climate Law, elements such as carbon taxation or quota systems, mandatory expenditures for green transition investments, and the prioritization of sustainability indicators in credit allocation criteria may affect the liquidity structure of businesses. In this context, liquidity risk may arise if GSD Finance is unable to readily convert its asset positions into cash due to market conditions or experiences cash flow irregularities resulting from climate-related regulations. Furthermore, the shallow market structure of certain products and market barriers may lead to potential losses if companies are unable to close or exit positions at appropriate prices, in sufficient quantities, and within a reasonable time frame. Irregularities in cash inflows and outflows and mismatches between cash flow maturities may prevent the company from meeting its funding obligations at a reasonable cost. Liquidity risk may not only increase short-term borrowing costs but also lead to reputational loss.					
Risk Score	Impact: 4		Probability: 2		Detectability: 3	
	24					
Resilience	Scenarios	Description	Operational Status	Mitigation/Planned Actions	Resilience Level	Outcome
	Good (RCP 2.6)	Market liquidity is high, cash management is efficient, and short-term liabilities are met.	There are no operational disruptions; credit requests are being met. Lending and borrowing activities are proceeding in a balanced manner.	• Daily liquidity reporting • Maintaining liquidity through short term instruments • Preferring risk-free positions	Very High	The cash position is strong, and both operational and strategic processes are being carried out securely, with the risk level remaining at a minimum.
	Normal (RCP 4.5)	Short term market fluctuations and temporary cash shortages are being experienced; however, resources are maintained at an adequate level.	Some short-term liabilities are being prioritized, and a partial contraction in operational activities is observed.	• Daily position planning according to cash requirements • Temporary tightening of credit limits • Evaluation of seasonal financing alternatives	High	The risk is felt at a limited level; liquidity constraints can largely be managed through existing cash reserves.
	Adverse (RCP 8.5)	Market liquidity has deteriorated to a level that significantly affects the institution, and short-term liabilities cannot be met. Access to external financing has weakened.	Delays in collections are observed, along with difficulties in payments, credit blockages, and a severe slowdown in operations.	• Implementation of emergency liquidity support plans (accelerating the collection of non-performing loans, seeking new borrowing channels, or selling assets) • Capital increase	Medium - Low	Operational performance has weakened due to the liquidity crisis; however, core activities are being sustained through the measures taken.

Risk Impacts	Short (0–1 year)	Medium (1–3 years)	Long (3+ years)
	Liquidity shortages may reduce the company's ability to generate new funds, cause failure in renewing obligations, and lead to unexpected withdrawals of available funds. Daily payments may be disrupted, operational expenses may not be covered, and debt repayment performance may decline.	Ongoing liquidity stress may restrict lending capacity, delay investment plans, and reduce customer confidence.	Persistent liquidity problems may threaten financial sustainability, weaken the capital structure, and severely limit access to external financing. Legal consequences may also arise.
Current Action Plans	To ensure effective preparedness against liquidity risk, cash management strategies have been established. Liquidity buffers are maintained to cover short term obligations, and potential bottlenecks are identified in advance through daily and weekly cash flow analyses. Care is taken to maintain a portfolio that includes highly liquid assets, while avoiding high risk positions.		
Responsible Departments	Treasury and Fund Management, Marketing Group, and Risk Management Departments		
Additional Action Plans	To further strengthen liquidity management, the development of an early warning tool is planned. This system will monitor deviations in the cash balance in real time and automatically issue notifications if certain thresholds are exceeded. In addition, stress test scenarios will be expanded, and scenario based action plans will be established for use in sudden liquidity needs.		
Monitoring Metrics	- Daily Net Cash Position - Liquidity Coverage Ratio (LCR) - Stress Testing and Scenario Analysis		
Financial Impact	Impact analyses were conducted for the identified risks to assess their potential effect on the financial performance of GSD Group. The results indicated that the financial impact remained below the materiality threshold. However, the underlying elements of this risk will continue to be monitored regularly and reviewed to address any potential future impacts.		
Additional Explanations	Liquidity risk is primarily associated with funding and cash management processes within the financial services segment. According to the FMEA methodology, the probability level has been assessed as “2” (low–medium), indicating that the risk is regularly monitored and that effective control mechanisms are in place against potential market fluctuations. In the short term (0–1 year), the likelihood of a liquidity squeeze is low; in the medium term (1–3 years), it may increase depending on economic volatility; and in the long term (3+ years), there is a risk of rising funding costs due to global regulations. Scenario analyses show that the potential financial impacts remain below the materiality threshold across all scenarios. These impact figures may vary depending on liquidity management strategies and credit portfolio performance. The impact direction is negative, as irregularities in cash flow can increase short-term borrowing costs and reduce the Group's financial flexibility. Risk assessments have been carried out using an FMEA based probability–impact–detectability matrix, and resilience levels have been determined through scenario analyses under different market conditions. Liquidity risk indicators are reported monthly by the Risk Management Department and evaluated in APKO (Audit and Risk Committee) meetings; indicators reaching a critical level are incorporated into the Board of Directors' decision cycle and integrated with appropriate action plans.		

Risk 2: Credit Risk

Risk Category	Economic & Governance Risk					
Risk Description	The failure of loans extended to clients subject to Climate Law to be repaid represents a significant risk that could adversely affect the financial structure in various ways. Unpaid loans can weaken capital adequacy and reduce financial resilience. Uncollectible receivables negatively impact cash flow, potentially leading to liquidity constraints. This situation may also harm the perception of credibility of GSD Finance; high levels of non-performing loans could diminish the company's market reputation. Consequently, increasing credit risk may limit the company's capacity to issue new loans, thereby reducing overall operational efficiency. Credit risk refers to the financial risk that arises when borrowers fail to fulfill their obligations on time. This risk becomes more pronounced in loans extended to clients operating in sectors subject to climate change-related regulations. Within the framework of Türkiye's Green Deal Action Plan, EU-aligned Carbon Border Adjustment Mechanism (CBAM), the Emissions Trading System (ETS), and the forthcoming Climate Law, companies operating in carbon-intensive sectors such as energy, transportation, industry, and agriculture are facing increased financial obligations, reduced competitiveness, and rising compliance costs. This directly affects their loan repayment performance, increasing the risk of non-performing loans in these sectors.					
Risk Score	Impact: 4		Probability: 3		Detectability: 2	
	24					
Resilience	Scenarios	Description	Operational Status	Mitigation/Planned Actions	Resilience Level	Outcome
	Good (RCP 2.6)	Credit repayment rates are high, and the risk of delay is low. The non-performing loan ratio is below the sector average.	Lending processes run smoothly, and there is an increase in new loan applications.	- Regular analysis of the credit portfolio and collateral structure, and measurement of creditworthiness - Active monitoring of risk ratios and early warning indicators - Updating risk profiles through the rating system	Very High	Both operational and financial alignment have been achieved; with strong collection and analysis processes, a high level of resilience is maintained.
	Normal (RCP 4.5)	Delayed payments show an upward trend, and a concentration of risk in certain sectors has been observed.	New loan approvals are carried out more cautiously, with additional collateral requested from high-risk clients.	- Closely monitor segments with a high probability of default - Restructure loans where necessary - Apply limits to high-risk sectors and ensure improvement in collateral quality	High	Thanks to proactive measures, the system continues to function; high risk clients and sectors are being closely monitored.
	Adverse (RCP 8.5)	The ratio of non-performing loans has increased rapidly, and some customer segments are experiencing mass defaults.	Credit allocation has been suspended, new customer or portfolio acquisitions have stopped, and inspections by regulatory authorities have intensified.	- Initiate legal proceedings for non-performing loans and strengthen cooperation with law firms - Increase capital - Support the capital adequacy ratio by reducing other risks to maintain balance - Increase the discount rate in collections	Medium – Low	Crisis management and emergency measures are being used to maintain resilience; however, sustainable lending activities are severely affected.

Risk Impacts	Short (0–1 year)	Medium (1–3 years)	Long (3+ years)
	Unpaid loans, uncollected receivables, and slower collection rates can adversely affect the liquidity structure, potentially causing cash flow problems in the short term. A decrease in interest income and an increase in provisioning rates reduce profitability, while collection and restructuring processes lead to a higher operational workload. If companies operating in sectors subject to climate regulations fail to adapt quickly, this may disrupt their cash flows and result in a decline in loan repayment rates in the short term.	Rising non-performing loan (NPL) ratios may require GSD Finance to increase its risk provisions, potentially weakening its equity structure. This process may reduce the company's lending capacity, limit its ability to participate in portfolio acquisitions, and lead to a contraction in the total loan volume. Additionally, higher ratios of non-performing receivables may increase regulatory scrutiny and the risk of sanctions by supervisory authorities. In the medium term, with the enactment of the Climate Law and the growing influence of EU driven environmental regulations, the financial fragility of carbon-intensive sectors may rise. This could result in sectoral risk concentration and create the need for a restructuring of the credit portfolio.	The persistence of non-performing loan (NPL) risk may damage the Group's reputation and lead to a decline in customer confidence. Continuously high default ratios can reduce its market value in the capital markets and weaken its competitiveness within the industry. Losing strategic flexibility may also cause the Group to fall behind in new product development and long term investments. In the long term, as companies that fail to access sustainable finance or integrate climate strategies are phased out, structural changes in credit portfolios may become necessary. Non-compliant clients may turn into systemic risks. Moreover, as financial institutions increasingly exclude sectors with higher environmental risk, credit policies could undergo a fundamental transformation.
	To proactively manage credit risk, the credit portfolio is monitored regularly. Customer level repayment performance, default history, and sectoral risk concentrations are periodically analyzed, and early warning systems are activated to detect potential deteriorations in advance. In this context, the risk profiles of debtor companies are updated based on financial reports and cash flow indicators. Where necessary, collateral conditions are revised or restructuring proposals are developed. Additionally, through the internal audit and risk management teams, controls related to collection processes are strengthened to identify potential issues before they cause operational disruptions.		
	Credit Allocation, Credit Monitoring, Risk Management, and Finance Departments		
Current Action Plans			
Responsible Departments			
Additional Action Plans	To establish a more systematic framework for managing credit risk, the development of early warning systems, stress tests, and methodological tools is planned. Through this system, payment delays, sectoral shocks, or liquidity risks will be anticipated in advance, and automatic risk classifications will be generated. Additionally, special monitoring lists will be created for high-risk loans, and customized collateral structures and repayment plans will be redesigned for these groups.		
Monitoring Metrics	- Non-Performing Loans Ratio (NPL Ratio) - Collection Success Rate - Number of Payment Delays Exceeding the Limit - Number of Stress Tests and Scenario Analyses		
Financial Impact	Impact analyses have been carried out to assess the potential effects of the identified risks on the financial performance of GSD Group. The results show that the financial impact remains below the materiality threshold. However, the components of this risk will continue to be monitored and reviewed regularly to address potential future impacts.		
Additional Explanations	For credit risk, according to the FMEA methodology, the probability level has been determined as “3” (medium), indicating that sector-based risk may increase with the introduction of climate regulations, yet can be kept under control through the portfolio diversification of GSD Yatırım Bankası A.Ş. and GSD Faktoring A.Ş.. In the short term (0–1 year), a limited credit default risk is expected; in the medium term (1–3 years), a deterioration in payment performance among carbon-intensive sectors is possible; and in the long term (3+ years), a structural adjustment of the portfolio may be required. Scenario analyses indicate that potential financial impacts remain below the materiality threshold in all cases. These impact levels are directly related to the non-performing loan ratio and sectoral risk concentration. The impact direction is negative, as an increase in credit defaults may lower the capital adequacy ratio, raise funding costs, and constrain new lending capacity. The risk assessment was conducted considering loan repayment performance, NPL ratios, and collection history data, supported by stress tests performed by the Internal Audit Unit. Credit risk analyses are reviewed monthly by the Risk Monitoring Committee and the Risk Management Department. Collection performance reports feed directly into Board of Directors' decision-making processes, while financial resilience reports are integrated into the Group's sustainability strategy and capital planning framework.		

Risk 3: Acute Physical Risk

Risk Category	Physical Risks Caused by Climate Change					
Risk Description	Acute physical risks such as severe storms, hurricanes, extreme waves, and heavy rainfall can create both operational and financial vulnerabilities in GSD Holding’s maritime operations. As the impacts of climate change intensify, these events may cause structural damage to vessels, lead to increased maintenance and repair costs, limit chartering opportunities, and ultimately have a negative effect on financial performance.					
Risk Score	Impact: 5		Probability: 1		Detectability: 5	
	25					
Resilience	Scenarios	Description	Operational Status	Mitigation/Planned Actions	Resilience Level	Outcome
	Good (RCP 2.6 – Low Emission) Sea Level Rise: 0.24 m, Temperature Increase: +1.5 °C	Sea level rise remains limited, and acute risks occur at low intensity.	There are no major disruptions in fleet operations, and charter contracts continue steadily.	Regular maintenance and insurance inspections are carried out, and emergency response plans are kept up to date.	High	Operational continuity is maintained, with no significant risks observed regarding charter income or fleet value.
	Normal (RCP 4.5 – Medium Emission) Sea Level Rise: 0.26 m, Temperature Increase: +2.5 °C	Sea level rise has accelerated, with storm surges and flooding events becoming more frequent.	Insurance costs are increasing, and higher risk premiums are being demanded in charter contracts.	Insurance policies are being expanded, high risk regions are being avoided, and contract clauses based on risk sharing principles with charters are being developed.	Medium	Operational risks are rising, fluctuations are observed in contract revenues, and moderate pressure is placed on fleet value.
	Adverse (RCP 6.0 – High Emission) Sea Level Rise: 0.30 m, Temperature Increase: +2.7 °C	Sea level rise and severe weather events have reached a critical level, causing more frequent disruptions in port areas and shipping routes.	Charter contracts are narrowing and rising sea levels are beginning to affect certain ports, negatively impacting trade. Insurance premiums are increasing significantly. Fleet value is declining, and difficulties are emerging in securing long-term charter contracts.	Energy efficient vessels are being prioritized within the fleet, and new investment plans are being developed under a climate-responsive fleet strategy.	Low	Revenue fluctuations, a decline in fleet value, and weakened financial performance are observed. Strategic transformation becomes a necessity.

Risk Impacts	Short (0–1 year)	Medium (1–3 years)	Long (3+ years)
	Severe storms and storm surges may lead to voyage cancellations or delays. Although these do not directly generate additional costs under charter contracts, such risks can increase insurance premiums and cause higher risk margins in new charter agreements.	The rise in climate related risks may lead to certain routes being perceived as more hazardous and to a decline in demand for vessels operating in these regions. Consequently, new charter contracts may be signed at lower rates or for shorter durations. Moreover, the increase in insurance costs can raise overall fleet management expenses.	The growing frequency of climate-related physical risks in the maritime sector can reduce the market value of vessels and diminish the attractiveness of assets. In some regions, operations may become unsustainable, requiring the repositioning of vessels. These conditions can lead to lower long-term charter revenues and weaker investment returns.
Current Action Plans	To enhance resilience against natural disasters, insurance policies covering operational risks of the fleet have been updated, and contractual obligations in critical operational processes have been secured.		
Responsible Departments	Operations and Chartering Department		
Additional Action Plans	Increasing the number of modern and newly built vessels in the fleet will strengthen its resilience against adverse environmental impacts. To further mitigate these risks, it is aimed to periodically update disaster risk analyses.		
Monitoring Metrics	• Number of disaster scenario drills • Number of additional clauses related to disaster risks in charter contracts • Rate of change in insurance premiums • Number of contract terminations or revisions due to disaster-related events		
Financial Impact	For the scenario analysis and assessment of potential disasters arising from acute physical risks, RCP 2.6, RCP 4.5, and RCP 6.0 scenarios developed under the guidance of IPCC were utilized. In evaluating financial impacts, parameters such as vessel charter revenues, increases in insurance premiums, contract cancellations or revisions, changes in fleet value, and operational downtime should be considered. However, in this year’s analyses, the financial impact was not quantified due to the uncertainty of the available data and the wide variability observed across the different scenarios. Accordingly, in line with the provisions of TSRS 1 Article 38 and TSRS 2 Article 19, no quantitative information can be provided, as the effects in question could not be individually identified and the level of measurement uncertainty remains significantly high.		
Additional Explanations	Acute physical risk has a direct impact on the safety of vessels, voyage continuity, and insurance costs, particularly for the fleets operated by GSD Shipping and GSD Denizcilik Gayrimenkul İnş. San. ve Tic. A.Ş.. Although the likelihood has been assessed as “1” (low) according to the FMEA method, under IPCC’s RCP 4.5 and RCP 6.0 scenarios, storm frequency and intensity are expected to increase in the medium and long term, indicating a potential rise in the likelihood score in the future. In the short term (0–1 year), the risk remains low; however, in the medium term (1–3 years), rising sea levels and wave heights may lead to higher insurance costs. In the long term (beyond 3 years), operational sustainability risks may emerge on certain routes. Financial impacts in RCP-based analyses have been assessed through increases in insurance premiums, risk margins reflected in charter contracts, and potential declines in fleet value. As of the 2024 reporting period, no numerical estimations have been made due to data uncertainty, and quantitative analysis is planned for the 2025 insurance renewal cycle. The impact direction is negative; increasing disaster risk, operational disruptions, and rising insurance costs may exert pressure on financial performance, while vessel value depreciation and reduced charter revenues also remain possible. The risk assessment was conducted based on IPCC’s RCP 2.6, 4.5, and 6.0 scenarios, taking into account sea level change, disaster frequency, operational disruptions, and insurance costs. In addition, short, medium, and long term scenario comparisons were performed in line with the TCFD methodology. Energy efficiency criteria are also considered in new vessel investments.		

Risk 4: Greenhouse Gas Emissions

Risk Category	Transition Risk					
Risk Description	Due to the maritime sector’s inclusion in the Emissions Trading System (ETS) and the FuelEU Maritime regulation, there is a risk of increasing financial burdens arising from greenhouse gas emissions generated by maritime operations. Within operational activities, factors that may trigger the realization of this risk include the absence of an EU ETS clause in charter agreements, the disappearance or default of the charterer, vessel malfunction or inability to continue the voyage while in port, or the lack of a charterer for the return voyage. In such cases, the payment obligations may need to be borne by the maritime subsidiaries of GSD Holding.					
Risk Score	Impact: 2		Probability: 2		Detectability: 5	
	20					
Resilience	Scenarios	Description	Operational Status	Mitigation/Planned Actions	Resilience Level	Outcome
	Good (RCP 2.6)	Carbon prices remain below projections.	Due to low carbon prices, no additional operational costs are incurred.	• Monitoring of carbon markets • Continuation of Energy Efficiency Design Index (EEDI) investments • Maintaining readiness of offset mechanisms	High	The risk is under control. Its impact on operations is limited, and investment capacity can be maintained.
	Normal (RCP 4.5)	Carbon prices remain at projected average levels.	Uncertainties have decreased, and the risk is now predictable and manageable.	• Feasibility studies for transitioning to alternative fuel consumption • Maintaining the current status quo	High	Through ongoing regulatory monitoring, the risk remains at a manageable level, and operational continuity is ensured.
	Adverse (RCP 8.5)	Carbon prices exceeding projections.	Rising costs may require a reshaping of operational priorities.	• Fleet downsizing • Use of external offset mechanisms and purchase of carbon credits	Medium	Carbon costs may have a direct impact on operations, requiring aggressive reduction plans and swift actions.

Risk Impacts	Short (0–1 year)	Medium (1–3 years)	Long (3+ years)
	Uncertainties regarding transitional provisions and the lack of clarity in related processes may create operational ambiguities concerning carbon tax implementation.	With the gradual reduction of free allowances, if allocation quantities do not align proportionally with operational emissions, unnecessary costs may arise.	In the event of a complete removal of free allowances, the resulting financial burden could increase operational costs and threaten the sustainability of activities.
Current Action Plans	The monitoring and verification of greenhouse gas emissions from the existing fleet are carried out regularly. Feasibility studies on alternative fuel technologies are ongoing, and suitable solutions are being evaluated. In addition, processes have been structured to ensure that all obligations under EU ETS and FuelEU Maritime regulations are fulfilled timely and completely.		
Responsible Departments	Operations and Chartering Department		
Additional Action Plans	Plans are being developed to replace vessels with low efficiency performance or those that have reached the end of their economic life with new ships compliant with EEDI and EEXI criteria. At the same time, it is aimed to develop collaborations for carbon reduction projects and integrate these initiatives into operational processes to offset emissions.		
Monitoring Metrics	- Carbon allowances under EU ETS (€/ton CO₂) - Total fleet-based emissions (tCO₂)		
Financial Impact	Impact analyses were conducted for the identified risks to assess their potential effects on the financial performance of GSD Group. As a result of these studies, it was determined that the financial impact remains below the materiality threshold. However, the components of this risk will continue to be monitored and regularly reviewed to anticipate and mitigate potential future impacts.		
Additional Explanations	In cases where fuel consumption falls under the responsibility of the charterer, if the charterer withdraws from the contract before completing the voyage or declares bankruptcy, the emission liability is transferred to GSD Holding's maritime subsidiaries. This situation directly increases operational carbon costs. According to the FMEA analysis, the likelihood has been assessed as "2" (low–medium), mainly due to the fact that operational processes are largely delegated to charterers. However, with the expansion of EU ETS scope as of 2026, the likelihood is expected to rise in the medium term. In the short term (0–1 year), emission-related costs are expected to remain limited; in the medium term (1–3 years), costs may increase with the reduction of free allowances; and in the long term (over 3 years), rising carbon prices could place significant pressure on the operational budgets of GSD Holding's maritime subsidiaries. Scenario analyses indicate that the potential financial impacts remain below the materiality threshold in all scenarios. These financial impact values were determined based on the market carbon unit price and the frequency of situations where operational control is transferred to GSD Holding's maritime subsidiaries. The direction of impact is negative: increasing carbon prices elevate operational costs, reduce fleet revenues, and exert pressure on financial performance. The risk assessment was carried out using annual verified emission data under EU ETS and FuelEU Maritime frameworks, with all calculations verified and scenario-modeled based on prevailing market carbon prices.		

Opportunity 1: Transition to a Low-Carbon Economy

Opportunity Category	Transition Opportunity					
Opportunity Description	With the implementation of regulatory mechanisms such as the Climate Law, EU ETS, and the CBAM (Carbon Border Adjustment Mechanism), producer companies that fail to adapt to the low-carbon economy may face financial distress. This situation could create a portfolio growth opportunity for GSD Varlık Yönetim A.Ş. through the acquisition and recovery of non-performing assets.					
Opportunity Score	Impact: 4		Probability: 2		Detectability: 4	
	32					
Resilience	Scenarios	Description	Operational Status	Mitigation/Planned Actions	Resilience Level	Outcome
	Good	Due to rising carbon costs and compliance burdens, many companies may reach the brink of bankruptcy, potentially triggering a chain of insolvencies.	High volume uncollectible debts enter the market, and asset valuations decline significantly.	By turning the pressure arising from the systemic crisis into an advantage, large scale portfolios can be acquired at very low prices, with priority given to liquid assets.	High	Through aggressive acquisition strategies, a high return potential is created, transforming the crisis into a strategic growth opportunity for GSD Varlık Yönetim A.Ş..
	Normal	Due to the impact of new regulations, payment crises increase among companies that fail to comply, and medium-sized firms face growing financial difficulties.	A large number of collateralized but non-performing debts emerge in the market, accelerating asset sales.	By taking advantage of market contraction, distressed assets can be acquired at low prices, and post-restructuring asset recovery can be expedited.	High	As the market tightens, GSD Varlık Yönetim A.Ş. has the opportunity to rapidly expand its portfolio, creating a profitable and controlled growth potential.
	Adverse	The number of companies unable to adapt to regulations remains limited, resulting in isolated bankruptcies in the market.	Only a small number of distressed assets enter the market.	Debts of highly collateralized and cash flow strong companies are acquired at low prices, enabling quick recoveries through rapid restructuring.	Medium	High margin transactions can be executed with low risk. The portfolio grows selectively while keeping operational workload at a minimum.

Impacts	Short (0–1 year)	Medium (1–3 years)	Long (3+ years)
	Companies caught unprepared for the obligations introduced by new regulations may experience credit rating downgrades, increasing the potential for non-performing receivables.	With the financial impact of ETS and CBAM costs, a rise in asset sales and debt restructuring requests may occur, offering an opportunity to expand the asset management portfolio.	As companies unable to adapt to the low-carbon economy are pushed out of the system, GSD Varlık Yönetim A.Ş. may acquire strategic assets that provide stable and recurring returns.
Current Action Plans	Developments in sectors directly affected by carbon tax implementations, market assessments, and regulation-driven risk indicators are regularly monitored. Potential asset movements that may present opportunities are identified in advance.		
Responsible Departments	GSD Varlık Yönetim A.Ş. Senior Management		
Additional Action Plans	Enhancing operational analysis capacity to capitalize on aggressive acquisition opportunities depending on market conditions.		
Monitoring Metrics	- Volume of acquired non-performing assets (million TRY/year) - Collection rate (% recovery / total portfolio)		
Financial Impact	Impact analyses were conducted for the identified opportunities to assess their potential effects on the financial performance of GSD Group. According to the results, the financial impacts were found to be below the defined materiality threshold. However, to ensure the continuity of sustainable performance, the components related to this opportunity are regularly monitored and systematically evaluated against potential future developments.		
Additional Explanations	The impact of new regulations is increasing the financial vulnerability of many companies operating in carbon-intensive sectors, creating a significant growth opportunity for GSD Varlık Yönetim A.Ş.. Although the likelihood has been assessed as “2” (low–medium) according to the FMEA method, the number of companies unable to comply is expected to rise as carbon regulations become fully enforced, leading to a higher likelihood in the medium term. In the short term (0–1 year), the impact is limited; however, in the medium term (1–3 years), the number of financially distressed companies is expected to increase. In the long term (over 3 years), the expansion of green finance instruments is anticipated to strengthen the potential for sustainable portfolio growth. Scenario analyses indicate that potential financial impacts remain below the materiality threshold across all scenarios. These financial returns may vary depending on the volume of asset acquisitions and the success rate of restructurings. The direction of impact is positive, as the transition to a low-carbon economy presents new financial growth areas and investment opportunities for GSD Varlık Yönetim A.Ş.. The opportunity has been assessed based on market trends, sector-specific bankruptcy rates, credit rating data of companies subject to carbon regulations, and regulatory analyses. Scenario analyses were conducted in accordance with the TCFD methodology.		

Opportunity 2: Operational and Environmental Competitive Advantage through an Energy Efficient Fleet

Opportunity Category	Transition Opportunity					
Opportunity Description	A fleet composed of younger, fuel efficient vessels capable of carrying greater loads with lower draft offers a significant advantage in a market environment characterized by increasing environmental impacts and operational cost pressures. These vessels, which operate on conventional fuels readily available at most ports, provide operational flexibility in fuel supply. At the same time, their energy saving systems reduce fuel consumption and emission levels per unit of transport, thereby lowering carbon costs. Moreover, they enhance the company’s ability to effectively respond to transportation demand in geographically sensitive regions prone to physical climate risks.					
Opportunity Score	Impact: 4		Probability: 3		Detectability: 3	
	36					
Resilience	Scenarios	Description	Operational Status	Mitigation/Planned Actions	Resilience Level	Outcome
	Good	International carbon pricing mechanisms become more widespread, and demand for low-carbon transportation services in the shipping sector rises rapidly. Charterers begin to prefer vessels with higher environmental performance.	The existing fleet, composed of energy-efficient and relatively new vessels, strengthens its competitive position without requiring additional investment, as it already meets environmental requirements during the transition period.	The low-emission transport capacity is actively leveraged in marketing strategies that highlight environmental performance.	High	Cost pressures related to carbon prices are reduced, access to environmentally focused transport demand increases, revenue base expands, and differentiation within the green shipping segment is achieved.
	Normal	International carbon pricing mechanisms are implemented gradually. Carbon regulations are phased in over time, yet charterers increasingly take environmental performance into account.	Thanks to the existing fleet structure, no additional investment is required to comply with the regulations. However, as competition intensifies, efficiency and transparency become more critical. Operational advantages continue, but market pressure remains high.	Energy efficiency and vessel performance are continuously monitored. Emission monitoring and reporting systems are enhanced to ensure corporate transparency, while energy-saving practices are expanded to maintain competitive advantage.	Medium	Profitability remains sustainable, and the company keeps pace with the market’s environmental transformation.
	Adverse	Carbon regulations progress slowly or are delayed. Fossil fuel prices rise, but environmental incentives remain limited. There is no significant change in customer demand.	Across the market, environmental performance is not yet a major differentiating factor; however, rising fuel costs are kept under control thanks to the energy-efficient fleet. The number of environmentally focused charterers remains limited.	Operational efficiency policies aimed at minimizing fuel consumption and keeping costs low are maintained. Fleet maintenance and modernization investments are spread over the long term, preserving liquidity.	Medium	The positive differentiation of the modern and efficient fleet remains limited. Returns on efficiency-related investments are slower, and the company remains on standby, prepared for the eventual implementation of environmental regulations.

Impacts	Short (0–1 year)	Medium (1–3 years)	Long (3+ years)
	Transportation operations carried out with fuel-efficient vessels reduce operational costs, while improvements in environmental performance indicators create a competitive advantage in marketing processes targeting low-emission transport demand.	The widespread adoption of energy saving systems across the fleet ensures a lasting reduction in fuel consumption and carbon emissions. This, in turn, limits the cost pressure on charterers in markets where carbon pricing mechanisms are implemented and enhances the competitive potential of our vessels.	The technical structure of the fleet enables long-term compliance with environmental regulations, reducing investment needs during the transition to low carbon shipping and increasing capital efficiency. If regulation-supported incentives and green financing opportunities for low-emission transport services continue to grow, the current fleet structure will secure a sustainable position that provides long-term competitive advantage.
Current Action Plans	The policy of maintaining a low average fleet age continues; vessels exceeding a certain age are phased out to preserve operational continuity and limit maintenance costs. Environmental performance indicators of the fleet are regularly monitored.		
Responsible Departments	Operations and Chartering Department		
Monitoring Metrics	• Average age of vessels in the fleet (years) • Share of vessels equipped with energy-saving systems in the total fleet (%) • Average daily fuel consumption per ton of carrying capacity (tons/day/ton carrying capacity) • CO₂ emission intensity per ton of carrying capacity (g CO₂ / (ton carrying capacity × ton–nautical mile)) • Unit fuel cost per total transport (USD / ton–nautical mile)		
Financial Impact	Impact analyses were conducted for the identified opportunities to assess their potential effects on the financial performance of GSD Group. According to the analysis results, the financial impacts were found to be below the defined materiality threshold. However, to ensure the continuity of sustainable performance, the components related to this opportunity are regularly monitored and systematically evaluated against potential future developments.		
Additional Explanations	This opportunity is based on reducing fuel costs, alleviating carbon pricing pressures, and achieving a competitive advantage in green shipping markets. According to the FMEA method, the likelihood has been assessed as “3” (medium–high), as the rapid strengthening of carbon regulations and increasing demand for green logistics enhance the potential realization of this opportunity. In the short term (0–1 year), operational cost advantages are achieved; in the medium term (1–3 years), demand for transportation services aligned with carbon regulations is expected to increase; and in the long term (beyond 3 years), the competitive advantage is anticipated to become permanent as green financing and carbon-neutral shipping criteria become mandatory. The financial impact of this opportunity has been evaluated based on fuel savings, avoided emission costs, reductions in insurance and maintenance expenses, and additional charter revenues derived from green transport services. The direction of impact is positive the energy efficient fleet structure enhances operational profitability, mitigates carbon risk, and strengthens the Group’s environmental performance. The opportunity assessment was conducted considering vessel based fuel consumption, CO emission intensity, average fleet age, and energy efficiency indicators (EEDI, EEXI, CII). Additionally, market analyses reflected the growing tendency among charterers to prefer low emission vessels.		

3.8. Climate Scenario Analyses

3.8.1. Physical Risk Scenario Analysis (RCP Scenarios)

Based on IPCC’s RCP 2.6, RCP 4.5, and RCP 8.5 scenarios, physical climate risks were assessed for the locations where the company’s facilities operate. The analysis examined both acute and chronic physical risks such as heatwaves, floods, heavy precipitation, and water stress.

RCP 2.6: Represents an optimistic scenario where strong climate policies are implemented, leading to rapid reductions in carbon emissions and limiting global temperature increase to below 1.5–2.0°C by 2100.

RCP 4.5: Reflects a moderate scenario where partial success of current policies achieves a medium level of carbon emission reduction, keeping temperature rise around 2.0–2.4°C by 2100.

RCP 8.5: Represents the worst case scenario, in which no action is taken and carbon emissions continue to rise, resulting in a temperature increase exceeding 4.0°C by 2100.

In the scenario analyses, the terms “short,” “medium,” and “long” correspond to time horizons commonly used in scientific climate projections: short term (up to 2030), medium term (up to 2050), and long term (up to 2100).

3.8.2. Transition Risk Scenario Analysis (SDS & RCP Scenarios)

The direction set by global climate policies and the ongoing regulatory transformation process introduce significant transition risks for the companies within the holding structure. In particular, carbon pricing mechanisms (such as EU Carbon Border Adjustment Mechanism – CBAM and Emissions Trading Systems – ETS) and sustainability reporting obligations (such as Turkish Sustainability Reporting Standards – TSRS and EU Corporate Sustainability Reporting Directive – CSRD) have a direct impact on the operational, financial, and strategic decisions of GSD Holding and its subsidiaries.

Assumption Title	Description	Possible Impacts	Strategic Response / Adaptation Approach
Policy and Regulation Assumption	It is anticipated that Türkiye will adopt a national ETS compatible with EU Green Deal and CBAM by 2030, and that the scope of TSRS and CSRD will expand.	Increased carbon costs and reporting obligations; pressure on carbon intensive sectors.	Monitoring of regulations, integration into the carbon market, and alignment with sustainability reporting requirements.
Carbon Price and Economic Assumption	It is assumed that the carbon price will reach an average of €80–100 /tCO ₂ e by 2030, and that fluctuations in energy prices will affect operational costs.	Short term cost increases; long term financial advantage through carbon efficient investments.	Energy efficiency investments, renewable energy purchasing strategies, and diversification of the carbon credit portfolio.
Technology Development Assumption	It is foreseen that renewable energy and low carbon technologies will become more widespread and affordable.	Need for technology investment; faster transition to low-carbon production.	Acceleration of energy efficiency and renewable energy infrastructure investments; inclusion in transformation programs.
Market and Finance Assumption	It is anticipated that climate-related financial risks will be priced into financial markets, and that ESG related financing instruments will become more widespread.	Differentiation in financial performance; direct advantage for low carbon projects.	Integration of ESG performance into financing processes; development of sustainable finance strategies.
Behavioral and Social Assumption	It is assumed that stakeholders’ demand for transparent and fair reporting will increase.	Impact on brand value and stakeholder preferences.	Strengthening of corporate communication; positioning as a transparent and sustainable brand.
Business Continuity Assumption	It is assumed that operational capacity, financial resilience, and investment priorities will be maintained during the transition period.	Short term operational pressures; goal of maintaining competitive advantage.	Risk-monitoring systems and dynamic scenario analysis will support strategic planning approaches.

Within the scope of this analysis, the potential transition risks that GSD Holding may face in its operating sectors have been evaluated based on the International Energy Agency (IEA) Sustainable Development Scenario (SDS) and IPCC’s RCP 2.6, RCP 4.5, and RCP 8.5 scenarios. Through these scenario analyses, the impacts of carbon regulations, market and technological transformations, and potential implications of regulatory compliance processes have been

comprehensively assessed, providing essential inputs for the strategic management of climate transition risks.

Scenario Assumptions

RCP 2.6: Rapid reduction of carbon emissions through the implementation of optimistic and robust climate policies, limiting the increase in global temperature to below 1.5–2.0°C by 2100.

RCP 4.5: Partial success of existing policies leading to a moderate reduction in carbon emissions, keeping the increase in global temperature at around 2.0–2.4°C by 2100.

RCP 8.5: Worst-case scenario in which no significant action is taken, resulting in continued growth of carbon emissions and a temperature increase exceeding 4.0°C by 2100.

3.8.3. GSD Holding – Risk Analysis with RCP Scenarios

Risk	RCP Scenario	Assumption	Impact	Risk Outlook	Risk Type
Liquidity Risk	RCP 2.6	Rapid emission reduction, strict regulations	Funding costs increase in the short term	Liquidity risk low, market stable	Transition Risk
	RCP 4.5	Moderate emission reduction policies	Credit portfolio fluctuations	Medium-term liquidity risk	Transition Risk
	RCP 8.5	High emissions, strict regulations	Customer defaults, reduced access to finance	High liquidity crisis risk	Physical + Transition Risk
Credit Risk	RCP 2.6	Strict regulations, transition to low-carbon economy	Payment difficulties in some market segments	Increase in non-performing loan ratio	Transition Risk
	RCP 4.5	Moderate emission reduction policies	Cash flow strain, volatile payment performance	Moderate counterparty risk, tighter credit access	Transition Risk
	RCP 8.5	Very high emissions, strict regulations	Sector-wide defaults, increase in bad loans	Portfolios are restructured	Physical + Transition Risk
Acute Physical Risk	RCP 2.6	Sea level +0.24 m, +1.5 °C	Storm risk low, limited insurance cost increase	Operational sustainability maintained	Physical Risk (low)
	RCP 4.5	Sea level +0.26 m, +2.5 °C	Storm and flood risk moderate	Revenue fluctuations, partial value loss	Physical Risk (medium)
	RCP 8.5	Sea level +0.30 m, +2.7 °C	Severe storms at critical levels	Significant revenue loss, pressure on asset values	Physical Risk (high)
Greenhouse Gas Emissions	RCP 2.6	Carbon prices moderate	Additional costs limited, operational sustainability maintained	Emission management capacity preserved	Transition Risk (low)
	RCP 4.5	Carbon prices around average	Costs measurable and manageable	Operational sustainability ensured	Transition Risk (medium)
	RCP 8.5	Very high carbon prices, strict regulations	Fleet investments under pressure, offset dependency increases	Financial pressure rises, budget strain	Transition Risk (critical)

In the climate related scenario analysis, RCP scenarios published by IPCC were used as references. These scenarios represent different climate conditions and provide a broad range of forward looking assessments. The analysis covers both transition risks (such as carbon pricing, regulatory changes, and market dynamics) and physical risks. The scenarios employed are consistent with the most recent international climate agreements and have been selected from the most scientifically reliable sources. Within the assessment process, short, medium, and long term analysis periods which defined in the report were separately evaluated to illustrate the temporal distribution of potential impacts on the company’s operations.

While developing the analyses, the climate policies in effect in the countries where the company operates and the international regulations binding those countries were evaluated together. In parallel with these climate policies, trends in international carbon markets and changes in emission reduction commitments were also considered in the scenario analyses. Macroeconomic trends were assessed based on their impacts on financing costs, credit flows, and market stability; potential fluctuations in economic growth and capital movements were reflected in the scenarios.

National and regional variables were addressed by considering factors such as uncertainties in local climate conditions, infrastructure resilience, and the availability of natural resources. Energy use was modeled directly through carbon emissions, while the effects of energy diversification and resource transition were indirectly included in the scope of analysis. Furthermore, developments in fuel efficiency and low carbon technologies were evaluated to integrate the potential long term effects of technological progress on risks and opportunities into the scenario analysis.

4. Risk and Opportunity Management

GSD Holding considers risk and opportunity management as one of the fundamental components of its strategic governance approach. Viewing uncertainty as a neutral concept, GSD Holding defines risks as the negative outcomes of uncertainty and opportunities as its positive outcomes; these two elements are managed through distinct approaches unless they overlap.

Across all subsidiaries of GSD Holding, climate related risks and opportunities are systematically identified by taking into account the corporate context, sectoral dynamics, and activity specific priorities. In this process, process flow maps and internal control procedures are actively utilized. The analysis, evaluation, and prioritization of risks and opportunities are carried out in alignment with GSD Holding’s integrated management systems. All findings are recorded within the framework of corporate risk management and related procedures and are regularly submitted to senior management for review.

A quantitative scoring method based on probability and impact is applied in the risk and opportunity management process. Probability ratings are determined using both historical data and forward looking projections, while the impact level is evaluated in the context of financial gains and losses.

Each parameter is scored on a scale from 1 (low) to 5 (high). Risks that exceed the threshold value are reviewed by the Early Detection of Risk Committee, which prepares mitigation plans and submits them for the Board of Directors’ evaluation.

The opportunity management approach is structured to support GSD Holding’s vision for growth, innovation, and competitiveness. In this context, opportunities are identified in areas such as new market entries, product and service diversification, digital transformation, and sustainability investments. These opportunities are rated and prioritized using the “Probability × Benefit” formula.

For opportunities exceeding the threshold value, monitoring plans are prepared and evaluated by the relevant governance boards and investment committees, then translated into strategic actions. Through this integrated structure, GSD Holding not only builds resilience against risks but also manages sustainable value creation at the corporate level by identifying opportunities at an early stage.

The total score is calculated using the formula “Risk Score = Probability × Impact.” The same system applies to opportunities as “Opportunity Score = Probability × Benefit.” Each element is evaluated based on both quantitative data and expert judgment.

In this context, the threshold values defined by GSD Holding are as follows:

- Risks exceeding a score of 20 points are defined as “significant and critical” and are subject to mandatory risk mitigation plans, which are monitored at the senior management level.
- Opportunities exceeding a score of 25 points are considered strategic initiatives with high benefit potential; specific monitoring and evaluation plans are prepared for these opportunities and integrated into business strategies.

These threshold values enable the prioritization of risks and opportunities, the differentiation of areas requiring action, and the effective allocation of resources. Within the framework of GSD Holding’s corporate risk management procedures, this system is reviewed at least once a year and updated when necessary.

Impact Assessment	Threshold Value
Risk	≥ 20 (Long Term)
Opportunity	≥ 25

The monitoring and evaluation activities carried out across GSD Holding’s subsidiaries are based on quantitative and qualitative data derived from the performance indicators of integrated management systems, customer and stakeholder feedback, supply chain risk analyses, and product/service compliance criteria. These processes directly contribute to the continuous improvement cycle established in line with sustainability principles.

During Management Review Meetings and within the relevant governance committees, the adequacy and effectiveness of the monitoring systems are regularly assessed. The evaluation results support the updating of existing risk mitigation and opportunity assessment plans, while also informing long term strategic planning. Through this approach, GSD Holding is able to proactively monitor climate related developments and build a flexible, resilient corporate structure that both controls uncertainties and captures transformation opportunities.

5. Targets and Metrics

In line with TSRS standards, GSD Holding is required to publicly disclose comprehensive sustainability metrics consistent with its governance structures, risk management processes, and sustainability objectives.

Under TSRS 2 standard, detailed and measurable information on climate related risks and opportunities has been presented, expanding the scope and depth of GSD Group’s sustainability reporting while enhancing transparency and accountability regarding climate change. Accordingly, the Group’s climate targets have been established based on its own operational structure, risk profile, opportunity areas, and performance metrics, without adopting a sector specific decarbonization approach.

GSD Holding’s sustainability indicators have been determined according to environmental, social, and governance criteria relevant to its business areas. This enables Holding to monitor its performance through tangible data, base strategic and operational decisions on sustainability principles, and set attainable targets that generate environmental and social value.

GSD Holding continuously improves its data collection capacity to more effectively monitor and analyze the impact of sustainability and climate related risks and opportunities across the Group’s business processes. Within the framework of compliance with TSRS 1 and TSRS 2 standards, the company aims to provide more comprehensive quantitative data and support its targets with concrete strategic action plans in the future.

To ensure transparency and reliability, detailed and clear information is provided regarding any changes in the metrics or methodologies included in the reporting scope. This approach ensures continuity, comparability, and consistency in reporting, allowing stakeholders to track the sustainability transformation in a reliable and holistic manner.

In accordance with Article 33 of TSRS 2 standard, GSD Holding clearly defines the quantitative and qualitative targets set to monitor its progress toward achieving its sustainability and climate related strategic objectives, along with their scope, foundations, and monitoring criteria. Since the existing data monitoring infrastructure was structured in 2024, this year has been adopted as the base year. All metrics and targets are monitored and evaluated in comparison with 2024 performance data.

Emission reduction targets are defined with a direct absolute reduction approach, aiming to lower GSD Holding’s total greenhouse gas emissions to a specific level. Meanwhile, targets related to operational efficiency improvements and energy consumption are monitored using both intensity based and absolute values, ensuring a comprehensive evaluation of both performance and overall impact.

As of the current reporting period, Scope 3 greenhouse gas emissions have been temporarily excluded from the reporting boundary. However, in line with GSD Holding’s long term objectives, the monitoring and disclosure of indirect emissions within this scope are planned to begin by 2026. This transition process also includes enhancing the data collection infrastructure and conducting an in depth analysis of supply chain interactions.

All targets and metrics established by GSD Holding have been designed and integrated in full alignment with Paris Climate Agreement, Türkiye’s Nationally Determined Contribution (NDC), European Green Deal, Task Force on Climate-related Financial Disclosures (TCFD), and Turkish Sustainability Reporting Standards (TSRS). This alignment ensures that GSD Holding’s sustainability transformation proceeds in harmony with both national and international policies.

5.1. Environmental Metrics and Targets

As GSD Holding, we place our environmental responsibilities at the core of our strategic priorities across the financial services and maritime sectors in which we operate. Mitigating climate change, improving resource efficiency, reducing emissions, and advancing sustainable finance practices form the foundation of our long term value creation approach.

In line with Turkish Sustainability Reporting Standards (TSRS), we regularly monitor our environmental performance, share it transparently with our stakeholders, and set continuous improvement goals. Under TSRS framework, our short, medium, and long term environmental objectives focus on the following key areas.

Target	Metric	Objective	Related Risk	Scope	Applicable Period	Base Year (2024) Status	Interim Targets	Target Type	Policy Link
Scope 1 Emission Reduction	tCO ₂ e/year	Gross Reduction	Risk 4	All operations	2024–2050	Gross 2,193.21 tCO ₂ e	2030: Gross 2% reduction 2050: Gross 15% reduction	Absolute	Paris Agreement, Türkiye NDC
Scope 2 Emission Reduction	tCO ₂ e/year	Gross Reduction	Risk 4	All operations	2024–2050	Market-Based: Gross 211.87 tCO ₂ e Location-Based: 0.00 tCO ₂ e	2030: Gross 20% reduction 2050: Gross 55% reduction	Absolute	Paris Agreement, Türkiye NDC
Renewable Energy Usage Rate	% Increase	Transition, Gross Reduction	Opportunity 2	All operations	2024–2050	0.00 MW	2030: 50%	Intensity-Based	European Green Deal, TSRS
Number of Energy Efficiency Projects	Number/year	Efficiency	Opportunity 2	All operations	2024–2050	1	2030: 22050: 4	Absolute	European Green Deal

5.2. Governance and Climate Risk Management Metrics and Targets

GSD Holding’s sustainability approach also encompasses an integrated understanding of climate risk management within its corporate governance processes.

The Board of Directors and its affiliated committees are at the core of decision making structures that evaluate climate related risks and opportunities. The Early Detection of Risk Committee (RESK) and the Sustainability Committee jointly oversee GSD Holding’s risk management framework in alignment with TSRS and TCFD standards.

5.3. Climate Related Targets

GSD Holding has adopted the achievement of Net Zero Carbon by 2053 as a key strategic priority. In this context, a sustainability roadmap has been developed to reduce greenhouse gas emissions and enhance climate change adaptation. The targets cover Scope 1 and Scope 2 emissions as defined under the Greenhouse Gas Protocol. Due to a transitional exemption regarding the disclosure of Scope 3 emissions for this reporting period, Scope 3 emissions are not included in this report.

Within the framework of the energy efficiency strategy, a reduction in total energy consumption is planned by 2030. This target is supported through efficiency improvements in energy use and the implementation of measures enabling a transition to renewable energy sources.

GSD Holding’s sustainability targets encompass all operations across the Group, and all business units are integrated into these objectives.

The targets effective as of 2024 are aligned with the long term Net Zero Carbon commitment and are monitored through 2030. Progress is made through short, medium, and long term plans, and sustainability performance is evaluated and reported annually.

GSD Holding’s Net Zero Carbon commitment is fully aligned with Paris Climate Agreement and Türkiye’s Nationally Determined Contribution (NDC). The targets are reported in accordance with TSRS principles and in compliance with both national and international standards.

This report has been prepared within the scope of GSD Holding’s first sustainability reporting period; therefore, there are no historical performance trends or target adjustments available for comparison with previous periods.

The defined climate targets focus on the reduction of gross greenhouse gas emissions; offsetting or carbon removal mechanisms within the scope of the Net Zero commitment have not yet been established.

During the first reporting period, the key metrics related to the targets were established. In subsequent periods, the monitoring of observable performance trends, the revision of targets, and the reporting of progress analyses are planned.

The review of targets is carried out periodically by GSD Holding Sustainability Committee and relevant departments. Sustainability performance indicators, environmental impact analyses, and annual reports are evaluated within this process. Operating under the supervision of the Board of Directors, the Sustainability Committee monitors operational progress and ensures the regular updating and improvement of targets. No third party verification has been conducted for the targets during this reporting period.

To monitor progress toward GSD Holding’s climate targets and evaluate its sustainability performance, the key metrics used are presented below:

• **Greenhouse Gas Emissions (tCO₂e):**
As this report represents the company’s first sustainability reporting period, the measurement approach, data inputs, and assumptions related to the calculation of greenhouse gas emissions have been established for the first time.

Within this scope:

- **Measurement Approach:** Calculations were carried out in accordance with the ISO 14064-1:2018 standard, based on activity data.
- **Data Inputs:** Primary data such as energy and fuel consumption quantities and transportation activities were used.
- **Assumptions:** Due to the limitations of the data collection infrastructure specific to the initial reporting year, some consumption data were included in the calculations based on invoice-derived values. IPCC 2006 and TEİAŞ national emission factors were used in emission calculations.
- **Future Periods:** In subsequent reporting periods, it is planned to digitalize measurement systems and minimize assumptions.

Scope 1 and Scope 2 emissions were calculated and reported on a gross basis for all subsidiaries using the standard calculation based method. Since 2024 marks the first reporting period, there are no comparable data or methodological changes.

Scope 1 emissions include direct emissions from stationary, mobile, and fugitive sources across GSD Group, as well as carbon emissions from vessels within the fleet.

Scope 2 emissions represent indirect, energy related emissions associated with purchased electricity consumption during the year, covering only the companies and branches of GSD Group operating in Türkiye.

Entities not included in either scope are: Silopi Elektrik A.Ş., which was sold in January 2025; GSD Eğitim Vakfı, a non-consolidated subsidiary in the financial statements; and GSD Ship Finance and GSD Shipping BV, which do not conduct activities resulting in direct greenhouse gas emissions.

Scope	Emission (tCO ₂ e)
Scope 1	2.193,21
Scope 2 (Location Based)	211,87
Scope 2 (Market Based)	-
Total	2.405,08

- **Total Energy Consumption (GJ):**
Monitoring of annual consumption data for electricity, natural gas, and other fossil fuels.
- **Renewable Energy Usage Rate (%):**
Determination of the proportion of energy obtained from renewable sources within total energy consumption.

These indicators are regularly reviewed to evaluate the effectiveness of actions taken under GSD Holding’s sustainability strategy and to ensure progress in line with established targets.

6. Events After the Reporting Period

On January 14, 2025, GSD Holding completed the sale of its 9.60% stake in Silopi Elektrik A.Ş., which operates in the energy sector, thereby terminating its activities in this field. For this reason, operations in the energy sector have not been included within the scope of this report.

7. Appendices

7.1. TSRS Content Index

TSRS 1: General Provisions on the Disclosure of Sustainability-Related Financial Information

Core Content	Standard Article Code	Section in Report Where Disclosure Appears
Governance	27-a	3.2. Roles and Responsibilities in Governance
	27-b	
Strategy	29	3.6. Strategy
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	33	3.7. Climate-Related Risks and Opportunities
	34-a	
	34-b	
	35 a-c, 36, 37, 38	
	35-d	
Risk Management	44-a	4. Risk and Opportunity Management
	44-b	
	44-c	
Metrics and Targets	46	5. Targets and Metrics

TSRS 2: Climate Related Disclosures

Core Content	Standard Article Code	Section in Report Where Disclosure Appears
Governance	6 a-b	3.2. Roles and Responsibilities in Governance
	9 a-e	
	10 a-d	
Strategy	13 a-b	3.7. Climate-Related Risks and Opportunities
	14 a-c	
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	21 a-c	
Climate Resilience	22 a-b	3.8. Climate Scenario Analyses
Risk Management	25 a-c	4. Risk and Opportunity Management
Metrics and Targets	28 a-c	5. Targets and Metrics

7.2.Limited Assurance Statement Under TSRS



CONVENIENCE TRANSLATION INTO ENGLISH OF
PRACTITIONER’S LIMITED ASSURANCE REPORT
ORIGINALLY ISSUED IN TURKISH

INDEPENDENT PRACTITIONER’S LIMITED ASSURANCE REPORT ON GSD HOLDİNG A.Ş.
AND ITS SUBSIDIARIES SUSTAINABILITY INFORMATION IN ACCORDANCE WITH
TURKISH SUSTAINABILITY REPORTING STANDARDS

To the General Assembly of GSD Holding A.Ş.

We have undertaken a limited assurance engagement on GSD Holding A.Ş. (the “Company”) and its subsidiaries (collectively referred to as the “Group”), sustainability information for the year ended 31 December 2024 in accordance with Turkish Sustainability Reporting Standards 1 “General Requirements for Disclosure of Sustainability-related Financial Information” and Turkish Sustainability Reporting Standards 2 “Climate Related Disclosures” (“Sustainability Information”).

Our assurance engagement does not extend to information in respect of earlier periods or other information linked to the Sustainability Information (including any images, audio files, document embedded in a website or embedded videos).

Our Limited Assurance Conclusion

Based on the procedures we have performed as described under the ‘Summary of the work we performed as the basis for our assurance conclusion’ and the evidence we have obtained, nothing has come to our attention that causes us to believe that Group’s Sustainability Information for the year ended 31 December 2024 is not prepared, in all material respects, in accordance with Turkish Sustainability Reporting Standards published in the Official Gazette dated 29 December 2023, and numbered 32414(M) and issued by Public Oversight Accounting and Auditing Standards Authority (the “POA”) . We do not express an assurance conclusion on information in respect of earlier periods.

Inherent Limitations in Preparing the Sustainability Information

As discussed in Note 3.7. Climate-Related Risks and Opportunities on pages 20 to 26 the Sustainability Information is subject to inherent uncertainty because of incomplete scientific and economic knowledge. Greenhouse gas emission quantification is subject to inherent uncertainty because of incomplete scientific knowledge. Additionally, the Sustainability Information includes information based on climate-related scenarios that is subject to inherent uncertainty because of incomplete scientific and economic knowledge about the likelihood, timing or effect of possible future physical and transitional climate-related impacts.

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Responsibilities of Management and Those Charged with Governance for the Sustainability Information

Management of Group are responsible for:

- The Group Company management is responsible for the preparation of the sustainability information in accordance with Turkish Sustainability Reporting Standards;
- Designing, implementing and maintaining internal control over information relevant to the preparation of the Sustainability Information that is free from material misstatement, whether due to fraud or error;
- The Group Management is also responsible for the selection and implementation of appropriate sustainability reporting methods, as well as making reasonable assumptions and developing estimates in accordance with the conditions.

Those charged with governance are responsible for overseeing the Group’s Company’s sustainability reporting process.

Practitioner’s Responsibilities for the Limited Assurance on Sustainability Information

We are responsible for:

- Planning and performing the engagement to obtain limited assurance about whether the Sustainability Information is free from material misstatement, whether due to fraud or error;
- Forming an independent conclusion, based on the procedures we have performed and the evidence we have obtained; and
- Reporting our conclusion to the Directors of Group.
- Perform risk assessment procedures, including obtaining an understanding of internal control relevant to the engagement, to identify where material misstatements are likely to arise, whether due to fraud or error, but not for the purpose of providing a conclusion on the effectiveness of the Group’s internal control.
- Design and perform procedures responsive to where material misstatements are likely to arise in the sustainability information. 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.

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Misstatements can arise from fraud or error. Misstatements 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 Sustainability Information.

As we are engaged to form an independent conclusion on the Sustainability Information as prepared by management, we are not permitted to be involved in the preparation of the Sustainability Information as doing so may compromise our independence.

Professional Standards Applied

We performed a limited assurance engagement in accordance with Standard on Assurance Engagements 3000 (Revised) Assurance Engagements other than Audits or Reviews of Historical Financial Information and, in respect of greenhouse gas emissions included in the Sustainability Information, in accordance with Standard on Assurance Engagements 3410 Assurance Engagements on Greenhouse Gas Statements, issued by POA.

Our Independence and Quality Management

We have complied with the independence and other ethical requirements of the Ethical Rules for Independent Auditors (including Independence Standards) (the “Ethical Rules”) issued by the POA, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior. Our firm applies Standard on Quality Management 1 and accordingly maintains a comprehensive system of quality management including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements. Our work was carried out by an independent and multidisciplinary team including assurance practitioners, sustainability and risk experts. We used the work of experts, in particular, to assist with determining the reasonableness of Group’s information and assumptions related to climate and sustainability risks and opportunities. We remain solely responsible for our assurance conclusion.



Summary of the Work we Performed as the Basis for our Assurance Conclusion

We are required to plan and perform our work to address the areas where we have identified that a material misstatement of the Sustainability Information is likely to arise. The procedures we performed were based on our professional judgment. In carrying out our limited assurance engagement on the Sustainability Information, we:

- Inquiries were conducted with the Group’s key senior personnel to understand the processes in place for obtaining the Sustainability Information for the reporting period
- The Group’s internal documentation was used to assess and review the information related to sustainability;
- Considered the presentation and disclosure of the Sustainability Information.
- Through inquiries, obtained an understanding of Group’s control environment, processes and information systems relevant to the preparation of the Sustainability Information, but did not evaluate the design of particular control activities, obtain evidence about their implementation or test their operating effectiveness;
- Evaluated whether Group’s methods for developing estimates are appropriate and had been consistently applied, but our procedures did not include testing the data on which the estimates are based or separately developing our own estimates against which to evaluate Group’s estimates;
- Obtained understanding of process for identifying risks and opportunities that are financially significant, along with the Group’s sustainability reporting process.

The procedures in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

PwC Bağımsız Denetim ve
Serbest Muhasebeci Mali Müşavirlik A.Ş.

Mehmet Cenk Uslu, SMMM
Independent Auditor

Istanbul, 31 October 2025



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