

LimakPort

İskenderun

Sustainability Report 2024

A Gateway to the Future:
LimakPort



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Purpose

We transform İskenderun Port into a modern and integrated logistics hub with our experience in the industry and our strategic investments, and act with the awareness of our environmental, economic and social responsibilities. We strive to contribute to sustainable development goals by providing safe, environmentally friendly and highly efficient port services. Within this scope, we are pleased to present our **2024 Sustainability Report**, a reflection of our determination in the field of sustainability, with you, our valued stakeholders.

The main purpose of this report is to showcase LimakPort's sustainability journey and to transparently share the impacts of our operations. Our strategy, priorities, performance and targets as well as our economic, environmental and social approach are shared in our report.

Unless otherwise stated, the expression “**LimakPort**” refers to **Limak İskenderun Uluslararası Liman İşletmeciliği A.Ş.** throughout the report.

Scope

This report was prepared for the financial year between **1 January 2024 and 31 December 2024** to cover LimakPort's main areas of activity; namely, port operations, dry bulk/general cargo/project cargo handling services, Ro-Ro and Ro-Pax services, terminal and railway connected terminal services, storage, pilotage/tow services and waste collection services. The report covers our financial and non-financial data. Unless otherwise stated, all information given in the report reflects consolidated data on operational activities of **Limak İskenderun Uluslararası Liman İşletmeciliği A.Ş.**

Unless otherwise stated, all financial data given in the report are in Turkish Liras (TRY) or US dollars (USD).

Principles and Standards

This report covers activities in the period between **1 January and 31 December 2024**, and was prepared on the basis of the internationally recognized **GRI (Global Reporting Initiative) Standards**. The principles of “materiality”, “stakeholder engagement”, “sustainability context” and “integrity” defined by GRI were taken as the basis in the reporting process. These principles guided LimakPort in defining its material topics about sustainability and developing its strategic approach.

Within the scope of the material topics we focus on, we directly contribute to **7** of the **United Nations' Sustainable Development Goals (SDGs)**, thus fulfilling our responsibility for the global sustainability agenda.

Comparative performance data for the last three years were offered in the “*Annexes*” section. We published this sustainability report for the first time, and aim to regularly update and share it with the public in the coming periods, ensuring transparent reporting of our progress.



You can find our report on <https://www.limakports.com.tr/en/limakports/sustainability> and contact us on iskenderunport@limakports.com for your opinions and requests.

Message from the General Manager

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Esteemed Stakeholders,

2024 was a year with intensifying economic uncertainties and geopolitical tensions on a global scale but a year in which the resilience, adaptability, and sustainability capacity of the logistics and port industry were tested. Global inflation, tightening monetary policies and fluctuations in energy prices led to shifts in global supply chains and establishment of regional cooperations, and increased the need for new logistics hubs. In this context, Türkiye’s foreign trade policies and regional advantages became even more critical.

As LimakPort İskenderun, located at a strategic point in the Eastern Mediterranean, continued to enhance our effectiveness in this transformation process, provide

sustainable solutions to our customers, and remain an essential chain of international logistics networks. Our rapid recovery and reconstruction process after the major earthquake in our region on 6 February 2023 allowed us to enter 2024 with renewed strength. This year, we achieved the highest annual performance in our history by surpassing our pre-earthquake container volumes.

Our container volume reached 525,360 TEU in 2024 with an increase of 9% compared to 2022, indicating a strong recovery and stable growth. A total of 771 container ships visited our port throughout the year, with an increase of 7% compared to 2022. We achieved the highest monthly container volume in our history with the handling services of 54,278 TEU in December. A high efficiency rate of 72% for full containers as well as our effective service schedules and solution-focused approach were the key factors behind this achievement.

As the closest seaport to Türkiye’s border crossings, our port is a strategic hub for transit trade. Our railway connection offered significant cost and time advantages to our customers, while our modern equipment and field expertise continued to be a strong reason for preference in container stuffing and unstuffing operations. We carried out 21,347 stuffing and 19,273 unstuffing operations in 2024.

In consequence of intensive interactions of our sales and marketing teams with exporter and importer companies, LimakPort reached the highest market share (29%) among Eastern Mediterranean ports in December 2024. LimakPort became one of the largest and state-of-the-art container terminals of Eastern Mediterranean region with an annual handling capacity of 1 million TEU, an expansion area of 1 million m², modern STS and RTG crane infrastructure, a water depth of 15.50 meters, and a breakwater protected against adverse weather conditions.

Our corporate sustainability management is led by the Sustainability Committee established under the Environment and Quality Directorate. We identify, monitor and transparently report our targets in line with the ESG criteria. As the first port to verify its carbon footprint in Türkiye, we maintain our leadership in this field. Feasibility studies were completed for the conversion of diesel-powered cranes and vehicles used in the port to electric by 2026. An emission reduction of 40% is targeted by 2031. Upon commissioning of the solar power plant investment, this rate will reach 70% compared to our current consumption. In 2024, technical preparations and engineering works were carried out for this target.

LimakPort is also committed to quality and management systems. Our port owns ISO 9001, ISO 14001, ISO 45001, ISO 14064 and ISO 10002 management system certifications, and has integrated the requirements of these standards into all operational processes.

Social responsibility and stakeholder orientation are the building blocks of LimakPort’s corporate values. After the earthquake on 6 February, a 250-container Life Village (Yaşam Kent) was set up for our employees who lost their homes in order to meet their accommodation needs quickly. Today, around 90% of our employees are locally employed and directly contribute to the regional economy. As one of the first Customer Services Department established in Turkish port industry, our Customer Services Department continues to make a difference in service quality with its specialized and dynamic team of 30 people.

We will continue to invest in environmentally friendly technologies, increase our operational efficiency, and add value to the society and economy in 2025 and beyond. I sincerely thank all employees, business partners and valued stakeholders who have believed in and contributed to us on this journey.

Sincerely,

Gündüz ARISOY
General Manager

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LimakPort in Brief

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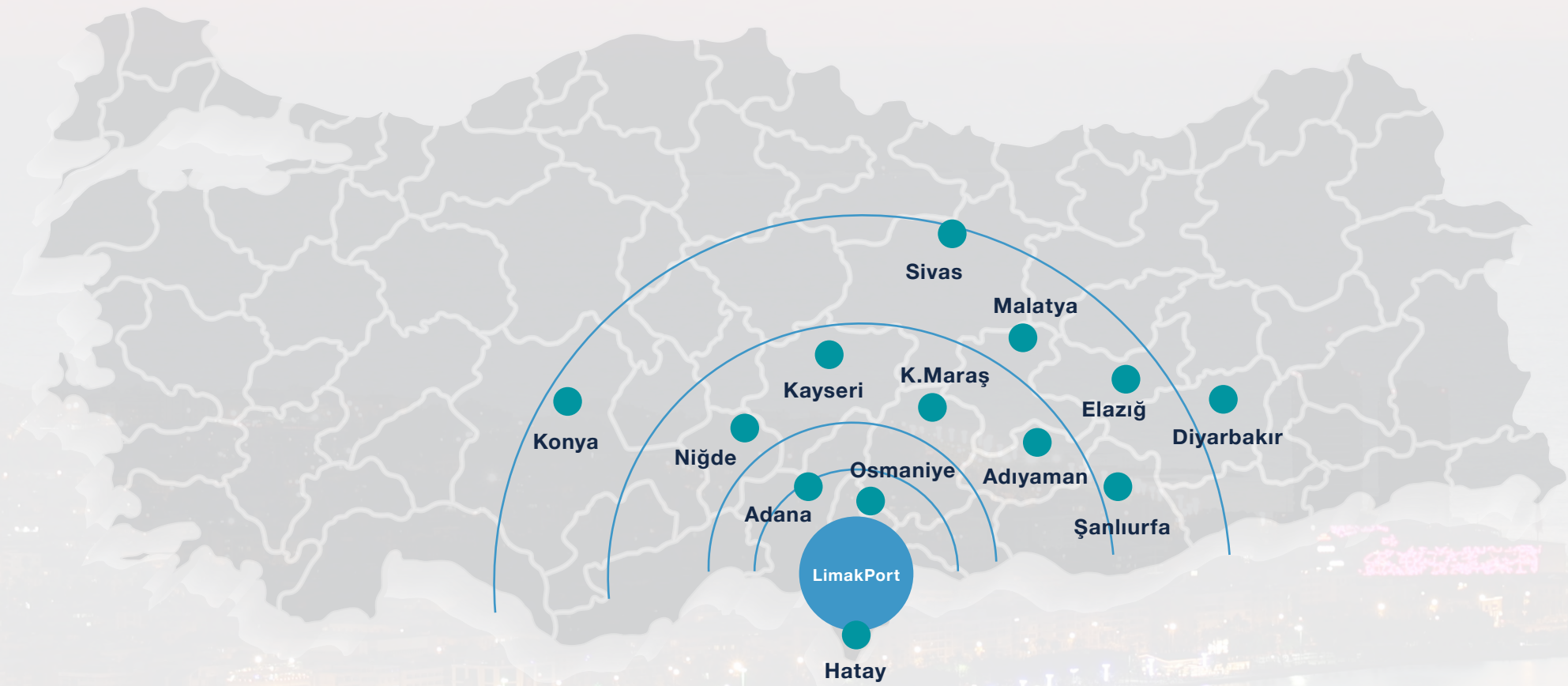
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LimakPort is not only a port where ships dock but also a strategic location where trade, technology and cooperation meet. By opening this gateway, we bring our customers and business partners together with global markets, and build the port of the future with sustainable and innovative solutions.

As LimakPort, we started our activities in 2011, when Limak Holding took over the operating rights of İskenderun Port for 36 years. Today, we are continuing to operate on a port area of 1,000,000 m² with 8 berths, an annual container capacity of 1,000,000 TEU, and a railway connected terminal. In the journey we set off with the motto “**Quality is not a choice, but an obligation for us**”, we are actively working with 151 countries as of this year.

As the gateway of Central Anatolia, Mediterranean, Eastern and Southeastern Anatolia regions to imports and exports, we operate as an indispensable hub for the industrialists and exporters of a large territory. By generating value, we support a fast and secure flow of trade and drive forward the competitive power of our business partners. On the other hand, we assume a critical role in the transit trade in the Middle East and serve as an important player of regional economy. **That is why we are the gateway to the future with our port.**



Container, Dry Bulk, Live Animal Transport, General Cargo & Project Cargo, Ro-Ro/Ro-Pax Services

709

Number of container ships served

7

Number of dry bulk ships served

35

Number of general cargo ships served

36

Number of live animal ships served

8

Number of Ro-Ro/Ro-Pax ships served

In 2024, **our revenue was USD 86,818,868**, and we **handled 5,671,687 tonnes of load**. On the other hand, we provided **services to 795 ships** in total within the scope of Dry Bulk, General Cargo and Project Cargo Services.

LimakPort Technical Features	Unit	
PORT AREA	m²	1,000,000
NUMBER OF BERTHS	#	8
CONTAINER BERTH WATER DEPTH	m	15.5
GENERAL CARGO BERTHS LENGTH	m	732
CONTAINER BERTHS LENGTH	m	920
REEFER PLUGS	#	600
CONTAINER CAPACITY	TEU/year	1,000,000
CONVENTIONAL CARGO CAPACITY (DRY BULK, GENERAL CARGO AND PROJECT CARGO)	tonnes/year	3,247,000
RO-RO CAPACITY	vehicles/year	120,000
RO-PAX CAPACITY	trucks/year	30,000

Our Values

Guided by these values that always illuminate our path, we continue our activities and create sustainable value for the future without straying from our principles.

As LimakPort employees, we are:

- 

Trained, skilled, hardworking
- 

Protecting the prestige of the company all the time
- 

Honest and committed to the company
- 

Open to learning and innovation
- 

Continuously improving
- 

Committed to the decisions and the objectives of the company
- 

Respectful and caring to each other
- 

Respectful to the environment
- 

Carrying the spirit of team working
- 

Fast decision makers within the flexible and horizontal organizational structure
- 

Standing firm on quality
- 

Confident that we shall be successful within every sector we take place.



Our Milestones

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Container

Dry Bulk and General Cargo

Ro-Ro Ropax

Terminal Services

Railway Connected Terminal Services

Storage Services

Pilotage/Tow Services

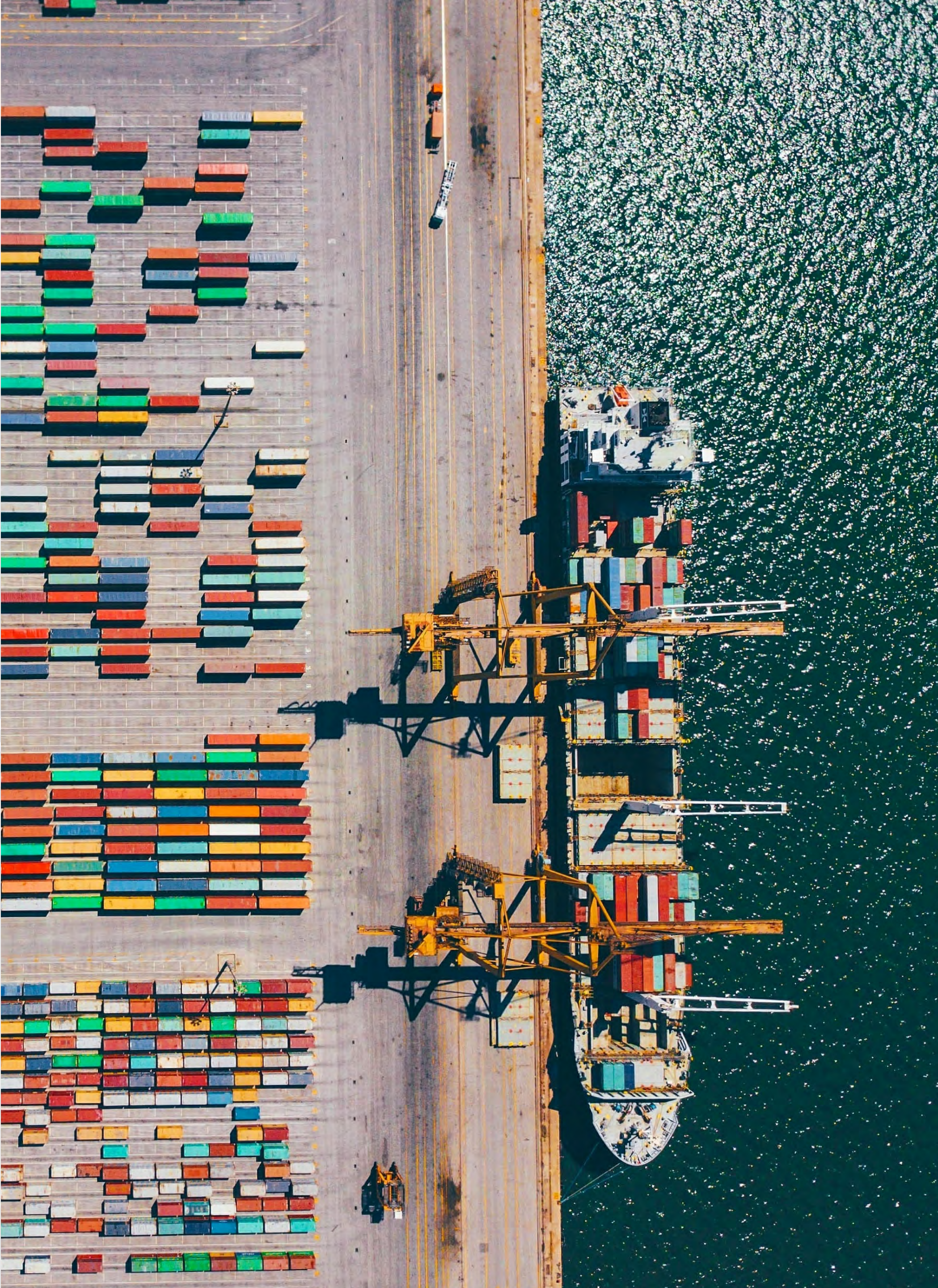
Waste Collection Services

As LimakPort, we provide our customers with comprehensive port operations through the wide variety of service areas we offer. Our container services provide fast and reliable loading and unloading operations with modern infrastructure and equipment, while we deliver efficient solutions for bulk cargo with high capacity.

We demonstrate a specialized approach in transporting heavy loads and specialized equipment with our project cargo management, and guarantee the safe delivery of all materials with our general cargo services. In live animal transportation, we conduct our processes meticulously by prioritizing the health and safety of the animals.

Our pilotage and tow services for Ro-Ro and Ro-Pax loads ensure the safe transport of vehicles and passengers, while we aim for maximum efficiency with minimal risk in our ship loading and unloading operations.

Our terminal storage options ensure that all types of cargo are maintained under suitable conditions, while our waste collection services demonstrate our commitment to sustainability by prioritizing environmental responsibility. With this wide range of services, we aim to go beyond industry standards and enhance customer satisfaction.



Our Value Chain

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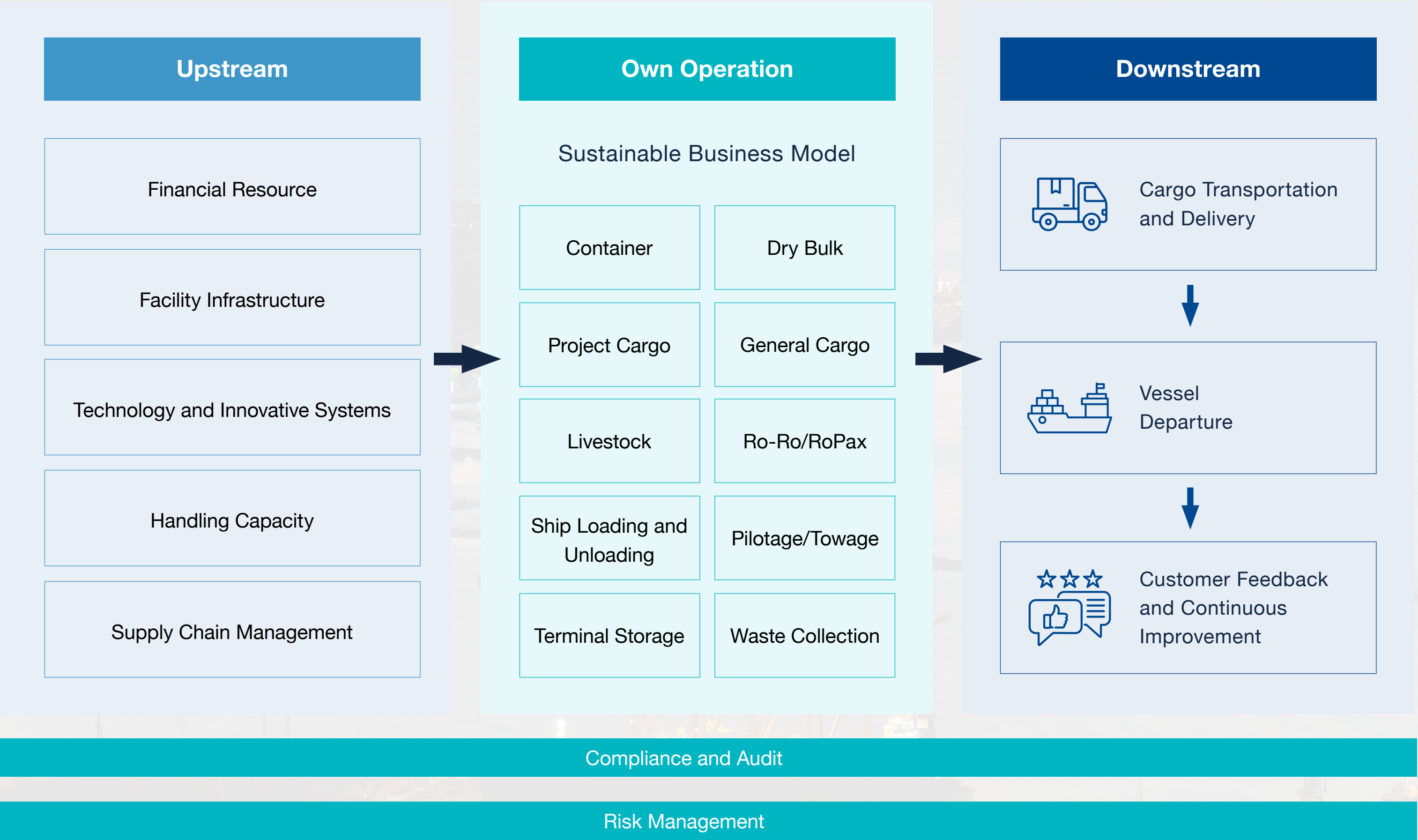
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As LimakPort, we are aware that we are not only a port operator but also a strategic part of the regional and global logistics network. Acting with this responsibility, we adopt an approach that creates impact and adds value at every stage of our operations.

Shaped by an inclusive and sustainable business model, all processes of our value chain, from pre-operations to post-operations, are centered around environmental awareness, digital transformation, customer satisfaction and ethical principles. Our multimodal structure, from container services to general cargo and from Ro-Ro operations to railway connected terminal services, has been designed with enough flexibility to accommodate a wide variety of cargo.

We provide our customers with end-to-end, reliable and efficient solutions while continuing to contribute to our sustainable development goals thanks to our modern infrastructure, intermodal transport capacity, technological equipment and expert team.

In line with this approach, we see every ship, cargo and stakeholder interaction at our port as a value-creation process, and believe that LimakPort’s long-term success is rooted in the integrity of this chain.



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Our Global Presence

We demonstrate a strong global presence with our growing customer portfolio each year.

Countries with the Highest Visit Rates in Our Port Operations

151
Countries Visiting Our Port

5,671,687 tonnes
Total Volume of Loads

3,752
Total Number of Customers

520
Total number of employees

\$ 86,818,868
Turnover / Revenue



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Macroeconomic Outlook

2024 was a year in which multidimensional vulnerabilities deepened in the global economy, while recovery was overshadowed by structural inequalities. As post-pandemic growth momentum remained unsettled, escalating geopolitical tensions on an international scale created uncertainty in the macroeconomic outlook. As stated in the International Money Fund’s (IMF) 2024 World Economic Outlook Report¹, macroeconomic recovery trend started to be observed as of the end of 2024.

In the 2024 Global Risks Report² published by the World Economic Forum, economic slowdown and high inflation ranked among the most concerning threats over the next two years. These risks oblige companies to develop more inclusive and resilient structures, not only operationally but also in terms of social sustainability.

Relevant Material Topics

Supply Chain Management,
Employee Wellbeing

Our Corporate Approach

We achieved a strong recovery in 2024 after the shrinkage in 2023 by carrying out our activities with determination in a period of intensifying macroeconomic uncertainties and pressures on global trade.

We increased our revenue from USD 66.8 million in 2023 to USD 86.8 million in 2024 (by approximately 30%). This increase was a result of our strategic steps towards operational efficiency and service variety, together with the recovery trend in regional and global trade.

We increased the number of countries we export to from 143 to 151 (by 5.6%). This expansion not only extended our reach in international markets but also supported the diversification of our trade networks.

We regularly measure and assess macroeconomic risks, and manage our operations along the axis of sustainable growth by shaping our risks.

As LimakPort, we continue to strengthen our financial and operational stability with an agile structure that is resilient against global fluctuations.

1 <https://www.imf.org/en/Publications/WEO/Issues/2024/04/16/world-economic-outlook-april-2024>
2 https://www3.weforum.org/docs/WEF_The_Global_Risks_Report_2024.pdf

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Geopolitical Issues

In 2024, geopolitical tensions increase the political and economic risk perception at global level, and decisively affected trade flows, energy security and supply chains. According to the 2024 Global Risks Report³ published by the World Economic Forum, interstate geopolitical conflicts rank among the most probable short-term risks over the next two years, deepening the pressure of geopolitical instabilities on the business world.

These developments directly affected maritime transport as well. Due to security issues in the Red Sea, many commercial ships diverted from the Suez Canal to the Cape of Good Hope route, increasing transit times, fuel consumption and logistics costs. The International Chamber of Shipping (ICS)⁴ stated that these changes in routes significantly increased freight rates across the industry and led to higher carbon emissions. Especially the diversion of large-tonnage container ships to alternative routes reshaped port connections between Europe and Asia. All these developments highlighted the need for strategic adaptation, not only in global trade systems but also in port operations and logistics infrastructure.

Our Corporate Approach

In 2024, increasing geopolitical tensions decisively affected global trade routes, and reshaped sectoral dynamics in terms of transit times, logistics costs and security risks.

As LimakPort, we serve as a transshipment port for Middle Eastern transit trade, as well as the gateway of Central Anatolia, Mediterranean, Eastern and Southeastern Anatolia regions to foreign trade. This location allows us to play a critical role in regional and global supply chains.

We include geopolitical risks in our inventory, and shape our operations in accordance with these risks. We see port security as our first priority, and provide a secure and monitorable operation area with our port card system granting access only to authorized personnel, private security team that is on duty 24/7, and electronic monitoring infrastructure consisting of 350 CCTV cameras with 360° coverage.

Relevant Material Topics

Supply Chain Management,
Port Security

3 https://www3.weforum.org/docs/WEF_The_Global_Risks_Report_2024.pdf
4 <https://www.ics-shipping.org/wp-content/uploads/2025/06/ICS-Barometer-2025.pdf>

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Climate Change and Extreme Weather Events

According to the World Economic Forum’s 2024 Global Risks Report⁵, extreme weather events due to climate change rank among the highest global risks in both short and long term. These data clearly reveal that the climate crisis is not only an environmental threat but also a direct element of financial and operational stress for the business world.

As the frequency and severity of climate-related disasters increases, their pressure on supply continuity, infrastructure resilience and logistics networks also intensifies. Due to weather events including extreme temperatures, sudden rainfall and storms, risk management and adaptation capabilities have become critical in sectors directly affected by climate, such as shipping and port operations.

In this context, combating climate change is the responsibility not only of states but also of the private sector. For companies, developing strategies that both enhance physical resilience and accelerate the transition to a low-carbon economy has become an essential component of sustainable survival beyond just a preference. Moreover, global coordination and collective action capacity in fields such as cross-border carbon regulations, sustainable finance and next-generation reporting standards will be the main decisive element of the ability to deliver effective responses to the climate crisis.

Our Corporate Approach

As LimakPort, we regularly monitor climate risks and develop solutions to enhance our resilience by integrating these risks into our corporate inventory. We reinforce the resilience of our infrastructure against events such as extreme heat, storms and floods, as well as utilizing early warning systems to ensure uninterrupted continuity of our operations through effective planning.

We expand our actions to reduce our carbon footprint, and focus on enhancing energy efficiency and adopting low-carbon operational models. We see clean energy transition not only as a global responsibility but also as an area of opportunity that increases competitive power. By increasing both physical and strategic resilience level against climate crisis, we shape our activities in accordance with sustainable development goals.

Relevant Material Topics

Climate Change

⁵ https://www3.weforum.org/docs/WEF_The_Global_Risks_Report_2024.pdf

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Change of Labor Standards and Human Health

As of 2024, the global labor force has been evolving rapidly with the effect of digitalization, AI and green transformation. The World Economic Forum states that the basic skills of 44% of employees will be reshaped by 2027 and 92 million digital jobs will emerge by 2030⁶, while ILO indicates that the global unemployment rate has increased to 5.2%, exceeding the pre-pandemic level. These developments reveal the importance of the labor force’s adaptation to new skills and of training investments. On the other hand, the climate crisis poses risks against occupational health and safety. ILO emphasizes that more than 70% of the labor force is exposed to climate-related health threats⁷. Mental health is another global trend. According to WHO data, mental disorders cause 12 billion lost days and USD 1 trillion economic loss every year⁸. Moreover, approximately 58% of the labor force around the world work in unregistered jobs and lack social security⁹. All these trends show the necessity of providing safe working environments, enhancing employee wellbeing, and developing inclusive workforce policies.

Our Corporate Approach

As LimakPort, we support unionization to improve our employees’ rights and working conditions. In this context, we initiated negotiations for a new term of collective labor agreement with the Dock and Ship Workers’ Union in 2024. We aim to enhance our employees’ quality of life by conducting the collective bargaining process with participatory, transparent and constructive dialogues.

Moreover, we see occupational health and safety as our top material topics, and prioritize protective practices against health risks caused by environmental factors. We value psychological safety as much as physical safety in our working environments, and support sustainable employment with initiatives that improve employee satisfaction and wellbeing.

Relevant Material Topics

Employee Wellbeing

6 <https://www.weforum.org/stories/2024/02/work-and-workplace-trends-to-watch-2024/>
7 https://www.ilo.org/sites/default/files/2024-07/ILO_SafeDay24_Report_r11.pdf
8 <https://www.who.int/news-room/fact-sheets/detail/mental-health-at-work>
9 <https://unstats.un.org/sdgs/report/2024/The-Sustainable-Development-Goals-Report-2024.pdf>

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Technological Transformation

As of 2024, strategic decision-making mechanisms of companies have been centered around digital transformation, radically changing the ways of doing business. Automation and AI applications have both improved efficiency and allowed employees to focus on more value-added areas.

However, these technological developments also brought along information pollution, cyber risks and ethical responsibilities. According to the World Economic Forum’s 2024 Global Risks Report¹⁰, misinformation and disinformation due to uncontrolled spread of technology come to the forefront as the greatest risk across the world in the short term. AI-supported content creation threatens the accuracy of information as well as causing serious uncertainties in topics such as social polarization, election security, and manipulation of public opinion. “Cyber security” ranks 4th in the short term and 8th in the long term in the same report, revealing the critical importance of the security aspect of technological transformation.

Therefore, digitalization is not only a technological investment but also a transformation that should be managed within the framework of data security, transparent algorithms and corporate ethics. The business world is obliged to handle this process as a comprehensive restructuring, both in terms of operations and human resources.

Our Corporate Approach

Digitalization in port operations is critically important, not only for operational efficiency but also for security, sustainability and strategic resilience. As LimakPort, we center our business model around digitalization, and create a difference with our port infrastructure that works in integration with digital technologies.

All operations are carried out in an integrated manner with an advanced Terminal Operation System (TOS). Thanks to this system supported with hand and vehicle terminals, we optimize container movements and ensure error-free and fast processing capability. Weighing systems integrated with the operational system at port entrances and exits also strengthen process transparency and traceability.

In line with our customer-focused digitalization approach, we ensure operational continuity by enhancing digital interaction points with our stakeholders through 24/7 accessible container operation tracking, real-time information flow via the customer portal, and a high-security wireless data communication infrastructure.

Our digitalization process is not limited to generating operational benefits. It also boosts our effectiveness in critical areas such as data-driven decision-making, remote monitoring, resource efficiency and employee safety. In this context, we integrate our human resources into the transformation by providing trainings that strengthen our employees’ adaptation to digital systems. As LimakPort, we see digitalization not only as a technological innovation but also as an indispensable strategic leverage for sustainability, safety and competitive power in port management.

Relevant Material Topics

R&D and Innovation

¹⁰ https://www3.weforum.org/docs/WEF_The_Global_Risks_Report_2024.pdf https://www3.weforum.org/docs/WEF_The_Global_Risks_Report_2024.pdf

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Sectoral Trends

Sustainable Investments/Green Investments

In the shipping sector, green investments refer to capital directed toward projects such as zero- or low-emission technologies on ships, energy efficiency improvements and renewable port infrastructure initiatives. These investments are critical for the decarbonization of international transport. For example, according to an analysis quoted by the IMO¹¹, it is expected that additional investments worth USD 8-28 billion per year will be required for full decarbonization of maritime transport by 2050, as well as USD 28-90 billion per year for a completely carbon-neutral fuel infrastructure. In the banking sector, 36 banks have joined the Poseidon Principles Initiative¹², which accounts for 80% of global ship financing, and continue their commitment to aligning their portfolios with the IMO’s 2050 targets. As another example, a special debt fund called the Green Shipping Fund¹³ with a size of EUR 420 million has been established at the European Union level. This fund finances clean shipping investments by extending loans to new or upgraded ships that achieve 20% lower emissions.

Incentivizing investments brings great opportunities as well as economic and operational challenges in the shipping sector.

In this context, shipping companies assume higher capital costs and technological risk, while governments and international organizations develop mechanisms such as green bonds, carbon pricing and government-backed loan guarantees. Challenges including the high cost of initial investments, technological uncertainties and lack of regulations can be solved by strengthening financing instruments through international cooperation, offering long-term incentive packages for investments, and clearly defining standards (e.g. low-emission criteria). For the shipping sector to achieve its decarbonization target, it is essential to implement and finance green projects with annual investments amounting to billions of dollars.

Relevant Material Topics
Corporate Governance

Our Corporate Approach

We attach great importance to sustainable and green investments. In line with decarbonization targets in the shipping sector, we support projects for port infrastructure based on zero- and low-emission technologies, energy efficiency upgrades and renewable energy resources.

In this context, we make and increase the necessary capital investments to implement low-carbon technologies through international financing tools and green bond framework. We continue our investments in the long term and with determination to align with climate targets despite increasing capital costs and technological risks in the sector.

11 <https://impact.economist.com/ocean/sustainable-ocean-economy/why-a-greener-maritime-future-is-crucial-for-sustainable-development>
12 <https://www.poseidonprinciples.org/finance/signatories/>
13 [http://transport.ec.europa.eu/transport-modes/maritime/ship-financing-portal/green-shipping-fund_en#:~:text=The%20Green%20Shipping%20Fund%20\(GSF,or%20for%20emissions-reducing%20retrofits.](http://transport.ec.europa.eu/transport-modes/maritime/ship-financing-portal/green-shipping-fund_en#:~:text=The%20Green%20Shipping%20Fund%20(GSF,or%20for%20emissions-reducing%20retrofits.)

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Green Port Operations

As of 2024, the concept of “Green Ports” has become a tool of strategic transformation as part of sustainability targets in the global shipping sector. Actors such as the International Maritime Organization (IMO), European Union Commission, Global Maritime Forum and Ministry of Transportation and Infrastructure of Republic of Türkiye develop policies for reducing the carbon footprint and increasing the energy efficiency of ports, and minimizing environmental impacts.

Green Ports aim for the reduction of air, water and soil pollution, increased use of renewable energy, efficient management of waste, and transition to zero-emission transportation by establishing environmentally friendly infrastructures. Data-driven performance monitoring systems and green financing mechanisms became widespread for decarbonization of port operations in projects supported by the World Bank, European Commission and IMO in 2024. In this context, green ports are recognized as structures that contribute not only to environmental sustainability but also to economic sustainability.

The European Union policies published as part of the Green Deal¹⁴ shaped the green port certification processes, while “Getting to Zero Coalition”¹⁵ published as part of the Global Maritime Forum emphasizes that the integration of zero-emission fuels into port infrastructures is critical for climate adaptation capacity of ports.

Relevant Material Topics
Climate Change

Our Corporate Approach

As LimakPort, we focus on environmental sustainability and take concrete steps for reducing our carbon emissions. We are a leader in this field as Türkiye’s first port to verify its carbon footprint under the ISO 14064-1 standard.

We aim to convert all diesel-powered vehicles and equipment to electric by 2031. We monitor our annual conversion rates and systematically track technological developments and environmental impacts.

We digitally manage our operations through terminal operating systems, and provide environmentally friendly and efficient port operations with our integrated security infrastructure and 24/7 monitoring systems. We take firm steps toward being a green port.

14 <https://ticaret.gov.tr/data/60f1200013b876eb28421b23/MUTABAKAT%20YE%C5%9E%C4%B0L.pdf>
15 <https://globalmaritimeforum.org/getting-to-zero-coalition/>

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Onshore Power Supply (OPS) for Carbon-Neutral Ports

Onshore Power Supply (OPS) is a system that allows ships to turn off their engines while docked at port and draw electricity from the onshore power grid. In this way, fossil-fuel-powered auxiliary engines on ships at berth can be turned off, significantly reducing CO₂, NO_x, SO_x and noise emissions. Effective from 1 January 2025, the FuelEU Maritime Regulation obliges all passenger and container ships to use OPS or equivalent zero-emission technologies when calling at ports starting from 2030¹⁶.

According to this regulation, the use of OPS will become mandatory, first at large ports (ports within the scope of Alternative Fuels Infrastructure Regulation) starting from 2030 and at all ports starting from 2035. The OPS is a critical step for air quality and public health in the port basin. Since fuel-derived energy is replaced with electricity, carbon emissions can be completely eliminated when supported by renewable energy from the power grid. Some leading ports have already established their OPS infrastructure. However, there are some challenges in common practices. Technically, compatible plug and voltage standards for different ship types are required, as well as a robust electrical infrastructure. In terms of economy, the high initial cost of OPS equipment and grid connectivity difficulties pose obstacles. These challenges are addressed with increased cooperation among the EU, development banks and port operators, and with grants provided for infrastructure investments.

Our Corporate Approach

As LimakPort, we closely follow the transition process to Onshore Power Supply (OPS) infrastructure, which will become obligatory for container and passenger ships starting from 2030 under the European Union's FuelEU Maritime Regulation. In line with our vision of being a carbon-free port, we aim to integrate systems that enable ships to receive power from the shore while docking into our operational structure.

We are aware of the impact of OPS systems in reducing carbon, NO_x, SO_x and noise emissions. Accordingly, we analyze technical requirements and shape our investment planning on the basis of long-term environmental benefits.

We aim to establish an infrastructure powered by clean energy and integrated with our on-site vehicle conversions within the scope of our electrification targets. We follow relevant funding mechanisms and international collaborations, and see the transition to OPS systems as a responsible and strategic step toward sustainable port operations.

Relevant Material Topics

Climate Change

¹⁶ https://transport.ec.europa.eu/news-events/news/new-eu-rules-aiming-decarbonise-maritime-sector-take-effect-2025-01-10_en#:~:text=10%20January%202025-,New%20EU%20rules%20aiming%20to%20decarbonise%20the%20maritime%20sector%20take,as%20of%201%20January%202025.

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Biodiversity Loss

Biodiversity loss in shipping occurs due to factors such as invasive species from ship operations, chemical pollution, ship noise and habitat destruction. According to the International Maritime Organization (IMO), the introduction of invasive aquatic species to new environments by ships is defined as “one of the key drivers of biodiversity loss”. These invasions create significant harm on ecosystems and have negative economic impacts on sectors such as fisheries and tourism. Maritime transport transfers living organisms such as algae, larvae or small organisms around the world via ballast water and biofouling, leading to the introduction of non-native species into local ecosystems.

The IMO and its partners take significant steps for the protection of marine ecosystems. Established in 2024 under the auspices of the IMO, the Global Industry Alliance (GIA) for Marine Biosafety plans various projects to manage biofouling in ships, including the revision of guidelines to prevent the spread of invasive species and implementation of biofouling management measures at ports. In combination with ship cleaning and new coating materials, these projects contribute to the protection of seas.

Challenges in protecting biodiversity include insufficient international coordination, lack of infrastructure in developing countries, and difficulties in enforcement. Despite the presence of global responses such as effective ballast water management and biofouling control, inconsistencies can occur in implementation. International technical cooperation, training and field support are key for solutions. Moreover, supplementary measures such as making ship designs more environmentally friendly, improving chemical waste management and expanding marine protected areas should be taken.

Relevant Material Topics

Protection of Biodiversity and Ecosystems

Our Corporate Approach

As LimakPort, prevention of biodiversity loss in shipping and prevention of marine ecosystems are our top priorities. We closely follow the standards and practices determined by the International Maritime Organization (IMO) and Global Industry Alliance (GIA) for ballast water management, biofouling control, and prevention of invasive species.

During our port operations, we contribute to the protection of marine species’ health by regularly cleaning hulls and supporting the use of environmentally friendly coating materials. Moreover, we carry out on-site inspections to strengthen the efforts for protecting the biodiversity, and achieve our sustainable maritime transport targets through local and international cooperation.

We expand environmentally friendly and compliant port practices, and continue to improve our technical infrastructure to manage chemical waste that harms marine ecosystems and to prevent the spread of invasive species in our ports. These efforts are the building blocks of our vision of growing as an environmentally friendly and sustainable port.

17 <https://www.imo.org/en/ourwork/environment/pages/biofouling.aspx>

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Green Corridors

Green corridors are special routes designed to encourage the shipping sector for rapid transition to zero-emission fuels. According to the Global Maritime Forum, green corridors are specific trade routes where the feasibility of zero-emission maritime transport is accelerated through public and private collaboration.¹⁸ In these corridors, the supply chain, ships and port infrastructure are planned in an integrated manner, enabling early testing and scaling of clean fuels such as green hydrogen, green ammonia and green methanol. According to analyses in 2024, more than 50 green corridor initiatives have been launched since 2021, and these innovative projects involved around 200 stakeholders and over 30 governments.

The number of green corridors has rapidly increased in recent years. According to GMF’s 2024 report, 18 new corridor initiatives have emerged in the last year alone, and around 40% of these initiatives have advanced through the development stage while 6 have reached the stage of real-world implementation.¹⁹ Green corridors accelerate technology learning through these pilot practices and provide companies with the opportunity to test ambitious zero-emission projects. In terms of economy, they give relevant governments the chance to prepare their trade for the future and take a role in climate leadership. However, they are technically and commercially complex projects. The initiatives can face challenges in establishing fuel infrastructure, creating demand and navigating regulatory uncertainties.

Our Corporate Approach

We acknowledge the critical role of green corridors for the widespread use of zero-emission fuels in shipping. Accordingly, we continue our efforts to adapt our port infrastructure to clean energy transition. We adopt a collaborative approach open to pilot projects to integrate technologies that support the use of renewable fuels such as green hydrogen, ammonia and methanol into our port operations.

Moreover, we closely follow the learning opportunities offered by green corridor initiatives, and act in coordination with our stakeholders to deal with challenges in regulatory frameworks and supply chain processes.

We are committed to be the pioneer of sustainable maritime transport with the climate leadership target, and contribute to carbon-neutral logistics chain by supporting the development of green corridors.

Relevant Material Topics

Climate Change

¹⁸ <https://globalmaritimeforum.org/green-corridors/>
¹⁹ https://downloads.ctfassets.net/gk3lrimlph5v/4mbqkJjNRTksqkNvK9lhtR/4939ac44d1b6029db4499cf6f5ec0f86/Getting_to_Zero_Coalition_Annual_progress_report_on_green_shipping_corridors_2024_edition.pdf

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Sustainability-based Legislation and Compliance Obligations

Legislations on sustainability have been evolving rapidly at the global level, making comprehensive compliance processes obligatory for countries and companies. The Corporate Sustainability Reporting Directive (CSRD) that entered into force in the European Union in 2024 opened the door to a new era of corporate transparency by requiring all large enterprises to disclose sustainability information in a transparent and standardized manner. Türkiye Sustainability Reporting Standards (TSRS) developed in alignment with the International Sustainability Standards Board (ISSB) and published by the Public Oversight, Accounting and Auditing Standards Authority in 2023 determined the sustainability reporting standards for domestic markets.

In addition, the Green Deal and Carbon Border Adjustment Mechanism (CBAM) created in line with the European Union’s commitment to achieve climate neutrality by 2050 require companies in carbon-intensive industries to restructure both their operational and financial models. Türkiye’s 2053 Net Zero Emissions target, combined with sustainable development goals, increases the environmental responsibility and innovation needs of the private sector. In this context, it has become a critical necessity for companies to develop strategic plans to improve their sustainability performance and comply with relevant regulations.

Our Corporate Approach

As LimakPort, we our sustainability targets with a focus on material topics such as the transition to electric vehicles, energy efficiency and zero-emission port infrastructure. We created our Sustainability-Linked Bond Framework (SLB Framework) to monitor and report these targets. In this way, we support the achievement of our targets by using financial instruments in our sustainability journey.

We also shape our sustainability strategies in alignment with international regulations and standards. We aim to both achieve our sustainable development goals and minimize our environmental impact with this approach.

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We provide reliable, fast and efficient port services with our impact area spreading across the region. Operational excellence, strong customer relations, environmental responsibility and investments focused on digital transformation are the pillars of our Company’s value creation philosophy. In line with our corporate governance approach, we balance economic success with social and environmental benefits by adhering to the principles of transparency, accountability and sustainability, thus creating long-term and sustainable value. Evolving and expanding day by day, our Company is not only a port for ships, but also a center where the region’s aspirations for development flourish.

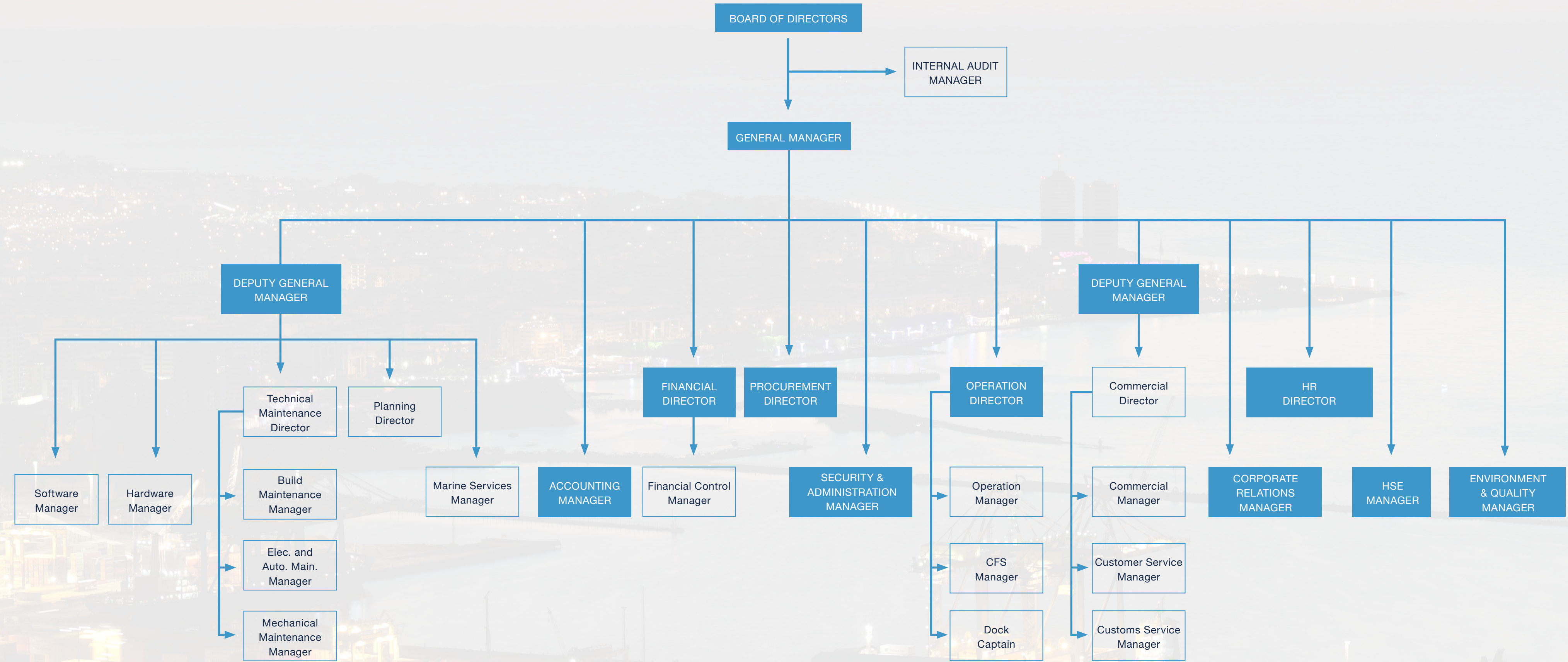
As LimakPort, we structured our governance mechanism in line with the corporate sustainability principles. We shape our strategy in line with the long-term objectives set forth by LimakPort’s Senior Management team to achieve operational excellence. We pursue cost efficiency, productivity and investment priorities from an economic perspective, while in the environmental field, while focusing on emission management, energy efficiency, waste management and regulatory compliance from an environmental perspective.

On the other hand, our strategic framework is built upon employee satisfaction, customer satisfaction, occupational health and safety and transparent communication with stakeholders from a social perspective.

We develop our strategies through an effective process that involves unit managers and is guided by internal expertise, accumulated knowledge and field experience. In the execution of these processes, we establish a holistic structure by taking key elements such as human resources, technological infrastructure, equipment capacity and facility infrastructure into consideration as well as trend analyses, customer expectations, regulatory requirements and sustainability principles. In the implementation of these decisions, we support the process with action plans prepared by our department managers and periodically measure our strategic progress using the established KPIs (Key Performance Indicators). We conduct all these processes with an understanding of accountability and corporate responsibility, supported by internal control and audit mechanisms.



Our Organizational Structure



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Ethics Management

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As LimakPort, we implement the Limak Holding’s [Code of Ethics](#) that covers all companies within Limak Group of Companies, and define all responsibilities of the Company, ethical behaviors expected from employees and the risks that can be encountered within the framework of our policy. Therefore, we holistically address the implementation steps of our business ethics policy covering anti-corruption, business ethics, accuracy in reporting, confidentiality, information security, occupational health and safety, and conflicts of interest. We have **an Ethics Line and an Ethical Committee** for the inspection of practices as well as detection, reporting and evaluation of any non-compliances.

In the event that any non-compliances with the published Business Ethics Rules are detected through the Ethics Line and Ethical Committee, a risk assessment is conducted for the relevant situation so that we can take the necessary action within the Company.

This policy is also available in [the Policies](#) section of our corporate website. We share our Business Ethics Rules with all employees via e-mail at certain intervals. Moreover, we encourage our employees to report any situations where they believe the ethical rules have been violated. Accordingly, we expect the violations to be reported via e-mail or the designated phone number.

As LimakPort, we include employees into the process of implementing these policies, in addition to applying the principle of segregation of duties to minimize ethical violations and prevent potential conflicts of interest and corruption risks. In this context, we define authorities and responsibilities in the circular of signatures, and manage the approval mechanisms through electronic systems, thus ensuring that transactions are carried out in accordance with the principles of independence and transparency.

Anti-Corruption

In our operations, we follow a “zero tolerance” policy for bribery and corruption and meet the highest ethical standards. All group companies and related third parties adhere to the [Anti Corruption Policy](#) prepared in accordance with national and international laws. The policy regulates the business trips and invitations attended by employees in the course of their duties, as well as explaining topics such as company mergers and acquisitions, contracts, role and appointment of intermediaries in business relations with third parties. It also covers social responsibility projects and aids. As LimakPort, we carefully monitor not only our own employees but also the parties we establish business relations with, ensuring that they act in accordance with the relevant policy when necessary.

We periodically review our **Compliance and Anti-Corruption Policy** according to current trends and risks. Therefore, we integrate our anti-corruption policies into our internal audit and risk management processes, updating these processes to address corruption risks. As part of the risk scoring conducted for all units of our Company, we carry out a comprehensive assessment that also takes corruption risk into consideration, and make a detailed analysis of points vulnerable to fraud and error in all operational processes. We aim to develop an anti-corruption and anti-bribery training in the short term to ensure that the entire process is maintained and embraced by all stakeholders of the Company, and plan to require every employee to complete this training once a year in the upcoming periods.

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As LimakPort, we implement effective internal control and internal audit mechanisms to ensure that our operations and activities are conducted in accordance with Company standards and ethical principles. Internal control activities are regularly and periodically reviewed and executed by the Financial Control Unit and the relevant functional departments, while internal audit activities are carried out by our Internal Audit Unit, which directly reports to the Board of Directors. In addition to financial audits, our Internal Audit Unit also conducts audits on corruption risks, social and environmental compliance and information technologies comprehensively. In 2024, we strengthened our compliance performance by expanding the scope of our audits compared to previous years.

While we conducted an average of 5 audits annually in 2022 and 2023, we increased this number by 60% to 8 audits in 2024.

Our Internal Audit Unit carries out effective audit activities in all critical processes of our Company. Our audit scope includes human resources operations, port activities, ERP (Enterprise Resource Planning) user authorizations, technical unit operations, and warehouse and inventory count in addition to accounting and finance processes such as procurement and payment, invoicing and progress payments. Within the scope of annual internal audit plan prepared after identification of risk areas, processes that carry a risk of corruption are prioritized. Therefore, the effectiveness of internal audit activities is evaluated from an independent and impartial perspective. It is aimed to continuously enhance control mechanisms through recommendations on

areas requiring improvement based on the findings of the audits. In this way, effective management of corporate risks is supported, and the Company’s sustainability and corporate governance performance is strengthened.

Our Internal Audit Unit adopts a comprehensive approach to ensure effective management of risks in business processes. Risks identified in areas such as supply chain management, procurement and cash operations are regularly monitored together with their risk scoring.

Accordingly, a proactive strategy for anti-corruption is implemented. Internal audit reports provide tangible

and actionable recommendations on the findings, and follow-up audits are conducted to check whether these recommendations have been implemented. In 2024, various improvement steps were taken to increase the effectiveness of internal audit activities. Within this scope, a corporate regulation was implemented to allow an employee from the Internal Audit Unit to take a role in the Disciplinary Board. One of our targets for the future is to transfer the processes for the follow-up of internal audit findings to digital environment via the QDMS (Quality Document Management System) platform as of 2025, thus increasing the effectiveness of finding follow-up mechanisms and managing improvement activities in a more transparent and traceable manner.



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We have been carrying out our activities without any violations of laws in the last 3 years.

To ensure legal compliance, we control and regularly follow our compliance frameworks in the fields of environment, occupational health and safety, accounting, technical affairs, security, administrative affairs and human resources, etc. related to our areas of activity through the system we established under Integrated Management Systems.

Legislative documents covered by the Integrated Management System include laws, regulations and communiqués, ISO and maritime standards, environmental legislations, resolutions, and international marine agreements that we comply with. National and sectoral regulations constitute the basis of this framework, ensuring that we address and continue our operations as per environmental and social standards. As LimakPort, we have been carrying out our activities without any violations of laws in the last 3 years thanks to this compliance. We aim to maintain this level of performance in the future as well, keeping our number of environmental penalties at zero.

The international standards that we comply with in our corporate governance structure and prioritize port security and environmental standards include:

Regulation	Regulation Name	Disclosure
SOLAS	International Convention for the Safety of Life at Sea	Sets marine security standards and ensures safe operation of ships.
ISPS Code	International Ship and Port Facility Security Code	Covers a series of security measures for increasing port security.
IMO	International Maritime Organization	Sets the regulations and standards related to international maritime transport.
MARPOL	International Convention for the Prevention of Pollution from Ships	A convention signed for preventing marine pollution from ships.
CTU Code	Code of Practice for Packing of Cargo Transport Units	Covers suggestions and regulations for safe packing and handling of cargo transport units.
IMDG Code	International Maritime Dangerous Goods Code	Sets the regulations for maritime transport of dangerous goods.
ILO 152	ILO Convention 152 on Health and Safety in Ports	Covers the rules defined for ensuring the health and security of port workers.
BC Code	Code of Practice for the Safe Loading and Unloading of Bulk Carriers	Covers the procedures necessary for safe loading and unloading of bulk cargoes.
IBC Code	The International Bulk Chemical Code	A code regulating the transport of dangerous chemicals in bulk.

We take into account the requirements that suppliers should fulfill to maintain legal compliance standards. We request documents such as tax certificates, trade registry gazettes, and signature circulars during the preliminary evaluation stage in order to monitor suppliers’ legal compliance performance. We check and evaluate whether the services or materials can be officially procured based on these documents.

We establish a foundation for legal compliance by drafting contracts in compliance with applicable environmental, legal, and commercial laws. Moreover, we take the protocols of the Personal Data Protection Law (PDPL) into account in our data collection and storage processes to ensure data confidentiality. We define contract frameworks with compliance clauses aligned with legal regulations in relation to the sector.

These practices play an important role in ensuring that the suppliers are continuously monitored and sanctions are implemented in cases of adverse situations outside the contract terms. Annual assessment and audit processes are conducted to mitigate legal risks, and help us to review suppliers’ compliance with requirements and legal obligations. As LimakPort, we allocate an annual budget for Legal consultancy, competition law consultancy, and UYAP (National Judiciary Informatics System) legal consultancy services in order to ensure seamless continuity of these legal compliance processes. We continue our efforts to ensure legal compliance and remain aligned with current legislation as necessary.

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Our Risk Management Approach



With our corporate risk management approach, we aim to establish a systematic and sustainable structure that encompasses all our areas of activity. We also aim to identify potential risks in advance and minimize their adverse effects through this five-step process.

At the stage of identifying risks as the first step, we determine potential risks in operational, financial, legal and environmental areas by taking into account management insights, employee notifications, past experiences and industry-specific standards. In the risk management process starting with the analysis of all our activities, we define the scope by considering our corporate structure, areas of operation, legal requirements, stakeholder expectations and environmental conditions. At the stage of defining risks, we determine potential threats in operational, financial and environmental areas, and carry out the process by referring to sources such as performance analyses and employee reports. We assess and prioritize the likelihood and impact of each risk, and develop the necessary measures and actions accordingly.

After developing the necessary strategies to mitigate or eliminate the identified risks, we establish implementation plans with the responsible units and prepare them for integration into our operations.

We analyze the defined risks using qualitative and quantitative methods based on their likelihood and impact levels. The risk matrices and likelihood-impact tables used at this stage help us to manage risks more effectively. In the risk assessment process, we determine the acceptability levels of risks, and identify which risks will be accepted and which require intervention by taking the corporate risk appetite into account. Then, we develop appropriate action plans to eliminate, mitigate or share the risks, and assign a responsible person or unit for each risk.

As LimakPort, we monitor the defined risks in regular management meetings, and update the lists of risks and actions taken according to developments.

We regularly conduct the risk monitoring and review processes, which involves updating the risk profile and dynamically reviewing the system according to changing conditions. In the next process, we regularly convey risk information to senior management and share it with all stakeholders through transparent communication. In this way, our corporate risk management system enhances our operational safety and helps us to make decisions aligned with our strategic objectives through a proactive and data-driven approach.

To ensure the continuity of the risk management system and enable all employees to internalize the identified risks, our risk management process is open and accessible not only to managers but to all personnel. We encourage employees to contribute to this process through training and notification mechanisms; therefore, we manage risks effectively and integrate the process into our decision-making and planning activities.

Sustainability and Climate Risks

As LimakPort, we consider climate change-related risks not only as environmental threats but also as factors that have an impact on operational, financial and strategic levels. Accordingly, we identified sustainability and climate risks by using internationally recognized sources (SASB, TCFD, etc.) in 2024. We included them in our pre-existing risk inventory that also included those related to sustainability.

In this context, we prioritize developing action plans for risks and monitoring these plans in management meetings. It is important for us to treat climate-related risks not only as a technical issue but also as a key factor integrated into all strategic decision-making processes of the organization.

On the other hand, we integrate climate-related risks and opportunities into our governance strategy. We aim to assess climate resilience in new investment decisions, and focus on solutions that reduce carbon footprint. We prioritize establishing transparent and continuous communication with all stakeholders on climate change-related risks and measures taken to address them in this process.

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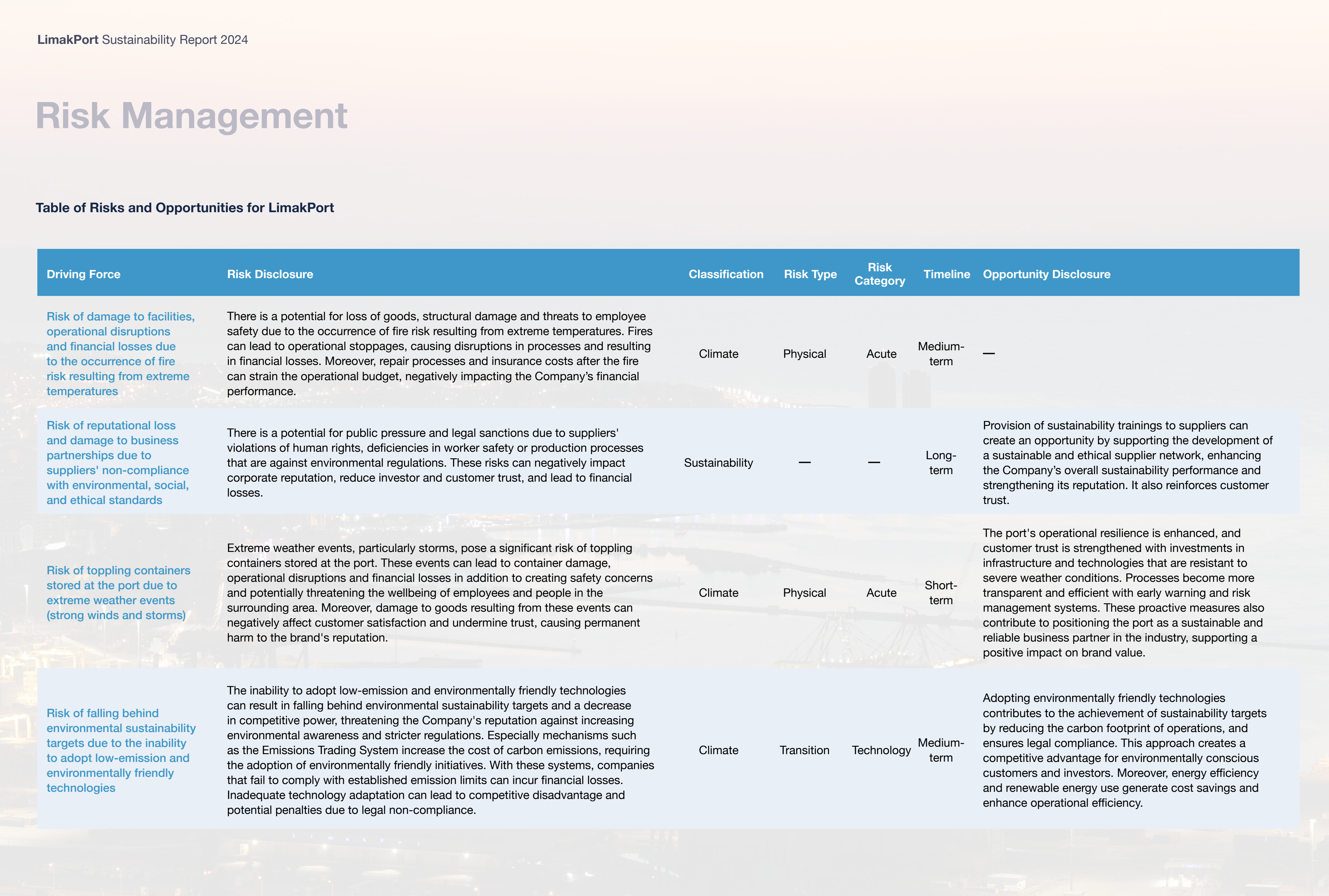
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Table of Risks and Opportunities for LimakPort

Driving Force	Risk Disclosure	Classification	Risk Type	Risk Category	Timeline	Opportunity Disclosure
	Risk of damage to facilities, operational disruptions and financial losses due to the occurrence of fire risk resulting from extreme temperatures	Climate	Physical	Acute	Medium-term	—
	Risk of reputational loss and damage to business partnerships due to suppliers' non-compliance with environmental, social, and ethical standards	Sustainability	—	—	Long-term	Provision of sustainability trainings to suppliers can create an opportunity by supporting the development of a sustainable and ethical supplier network, enhancing the Company's overall sustainability performance and strengthening its reputation. It also reinforces customer trust.
	Risk of toppling containers stored at the port due to extreme weather events (strong winds and storms)	Climate	Physical	Acute	Short-term	The port's operational resilience is enhanced, and customer trust is strengthened with investments in infrastructure and technologies that are resistant to severe weather conditions. Processes become more transparent and efficient with early warning and risk management systems. These proactive measures also contribute to positioning the port as a sustainable and reliable business partner in the industry, supporting a positive impact on brand value.
	Risk of falling behind environmental sustainability targets due to the inability to adopt low-emission and environmentally friendly technologies	Climate	Transition	Technology	Medium-term	Adopting environmentally friendly technologies contributes to the achievement of sustainability targets by reducing the carbon footprint of operations, and ensures legal compliance. This approach creates a competitive advantage for environmentally conscious customers and investors. Moreover, energy efficiency and renewable energy use generate cost savings and enhance operational efficiency.

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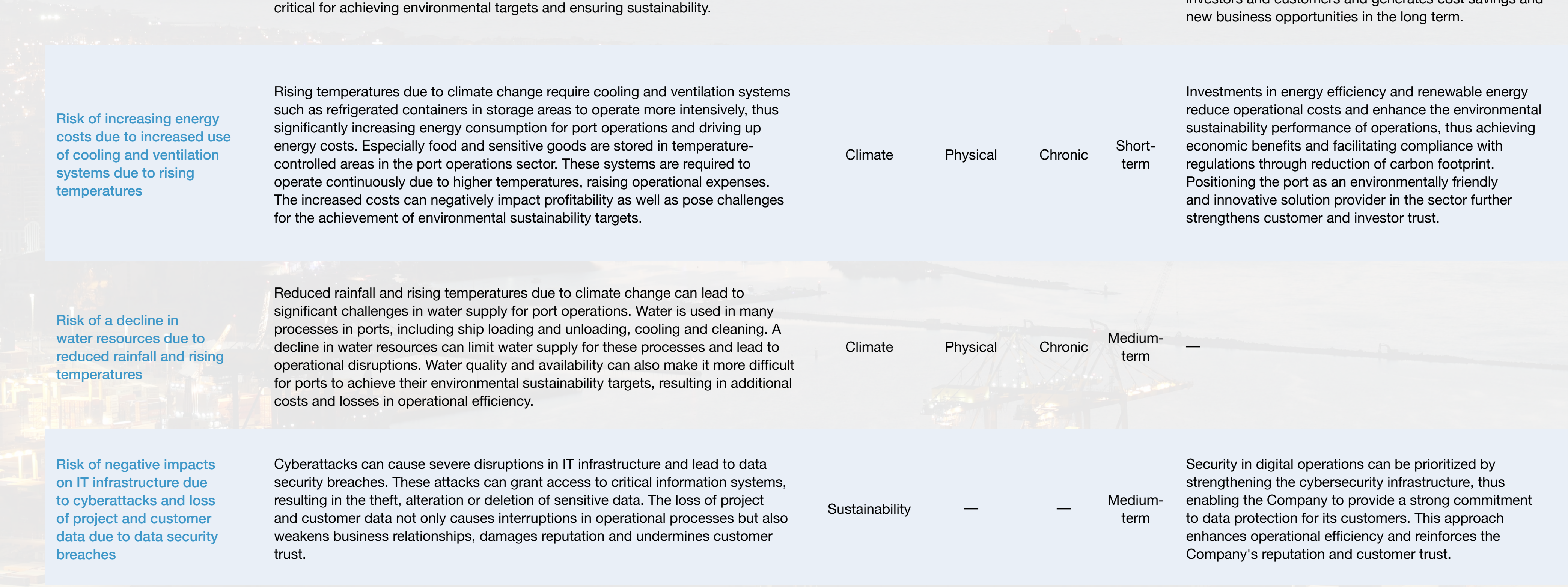
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Driving Force	Risk Disclosure	Classification	Risk Type	Risk Category	Timeline	Opportunity Disclosure
	Risk of increased operational costs as per the obligations brought by the compliance process to Climate Law developed to address climate change	Climate	Transition	Regulatory and Legal	Short-term	The processes of compliance with climate regulations enhance the Company's operational efficiency by providing an opportunity to invest in innovative and low-carbon technologies. This compliance contributes to the minimization of legal risks and strengthens the Company's competitiveness in sustainability. Moreover, improvement of environmental performance increases trust among investors and customers and generates cost savings and new business opportunities in the long term.
	Risk of increasing energy costs due to increased use of cooling and ventilation systems due to rising temperatures					
	Risk of a decline in water resources due to reduced rainfall and rising temperatures	Climate	Physical	Chronic	Short-term	Investments in energy efficiency and renewable energy reduce operational costs and enhance the environmental sustainability performance of operations, thus achieving economic benefits and facilitating compliance with regulations through reduction of carbon footprint. Positioning the port as an environmentally friendly and innovative solution provider in the sector further strengthens customer and investor trust.
	Risk of negative impacts on IT infrastructure due to cyberattacks and loss of project and customer data due to data security breaches	Sustainability	—	—	Medium-term	Security in digital operations can be prioritized by strengthening the cybersecurity infrastructure, thus enabling the Company to provide a strong commitment to data protection for its customers. This approach enhances operational efficiency and reinforces the Company's reputation and customer trust.

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Driving Force	Risk Disclosure	Classification	Risk Type	Risk Category	Timeline	Opportunity Disclosure
	Risk of falling behind, weakening its competitive power and losing its competitive advantages due to competitors' adoption of sustainable and low-emission port regulations and standards	Climate	Transition	Market	Long-term	Early compliance with sustainability and low-emission standards enables the port to maintain and strengthen its competitive advantage. Prestigious certifications such as the Green Port Certificate enhance brand reputation and reinforce customer trust. Proactive compliance helps the reduction of financial risks, supports long-term growth and positions the Company as a leader in the sector.
	Risk of failing to take adequate measures for the disposal of hazardous waste, oil and chemical substances during port operations as well as emissions that cause air and water pollution in compliance with regulations, and leading to negative environmental impacts and legal sanctions	Sustainability	—	—	Medium-term	Full compliance with international regulations while disposing of hazardous waste and chemical substances can minimize environmental impacts and eliminate legal risks. This compliance contributes to the protection of water and air quality, strengthens the Company's environmentally friendly image and supports the achievement of sustainability targets.
	Risk of employee injuries, illnesses or fatalities due to insufficient fulfillment of workplace safety and hygiene standards	Sustainability	—	—	Short-term	Periodical updates of policies and procedures on occupational health, safety and hygiene in consequence of risk assessments reduce the number of accidents, enhance the Company's brand reputation, and keep positive levels of stakeholder perception.

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Driving Force	Risk Disclosure	Classification	Risk Type	Risk Category	Timeline	Opportunity Disclosure
Risk of losing competitive advantage due to failure to invest in next generation technologies such as digital resources, AI and IoT	Insufficient utilization of information systems, technology and digital resources can cause companies to fall behind in competition when combined with a lack of investment in emerging technologies such as artificial intelligence (AI) and Internet of Things (IoT), resulting in slower business processes and reduced efficiency. Companies that fail to utilize technology effectively can encounter customer dissatisfaction by struggling to develop innovative solutions. These conditions cause the Company to lose its market share and weaken its competitive power in the long term, bringing along significant risks for sustainable growth and profitability.	Sustainability	—	—	Long-term	Increasing operational efficiency and analyzing customer preferences through the use of data analytics and business intelligence tools can support better strategic decision-making and help the Company to optimize operational processes.
Risk of encountering social disturbances and damage to the Company's reputation due to negative effects of the Company's operations on local communities	The Company's operations can have negative effects on local communities and lead to social disturbances. These effects can arise from environmental impacts, economic losses or a decline in quality of life. Demands and dissatisfaction of the community can result in actions such as protests, contributing to social disturbances. The Company's operations can be adversely affected in such an environment, and communication channels and community relations can become complex. These disturbances can damage the Company's reputation, undermine customer trust and weaken its market position in the long term.	Sustainability	—	—	Short-term	The Company's reputation is maintained through relationships with civil society and local communities as well as social responsibility projects. This approach contributes to strengthening local support and trust, and provides a solid foundation for sustainable growth and market success in the long term.
Risk of environmental pollution, legal sanctions, fines and loss of reputation due to the improper management of sludge and bilge wastes	Sludge and bilge wastes generated during port operations and shipping activities are pollutants originating from ship engines, loading and unloading processes and other operational activities. As these wastes have the potential to harm the environment, they are strictly regulated by international maritime standards and local environmental regulations. The discharge or improper management of sludge and bilge wastes can cause significant damage to marine ecosystems and serious environmental pollution, violating environmentally sensitive laws and regulations. This situation potentially results in severe fines, environmental compensation or operational shutdowns. Moreover, publicity of these environmental violations can cause damage to the Company's reputation and loss of trust among potential customers.	Sustainability	—	—	Short-term	Effective waste management processes and compliance with regulations can constitute a solid foundation for long-term growth by reinforcing the Company's leadership in the sector. Minimization of environmental pollution and legal risks also enhances customer trust.

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Driving Force	Risk Disclosure	Classification	Risk Type	Risk Category	Timeline	Opportunity Disclosure
	Risk of marine pollution, environmental damage, legal sanctions and loss of reputation due to sinking ships	Sustainability	—	—	Short-term	Reputation management in environmental matters can be enhanced by reporting environmental performance and ship safety practices transparently, implementing established protocols for operational and environmental compliance actions (including in case of sinking ships) and maintaining clear communication with external stakeholders.
	Risk of disruptions in timely and safe docking, loading and unloading of ships, damage to customer's goods, damage to berths, delays in services and accidents due to adverse weather conditions	Climate	Physical	Acute	Short-term	Service continuity and security can be prioritized by increasing operational resilience against adverse weather conditions. This approach highlights the port's capacity to provide safe and reliable services despite weather conditions, creating a competitive advantage in the market.
	Risk of legal compliance and reputation due to receiving inaccurate and incomplete cargo information or incorrect declarations from customers	Sustainability	—	—	Short-term	Using digital platforms and data integration systems to collect and verify customer declarations reduces manual data input errors and accelerates information flow.

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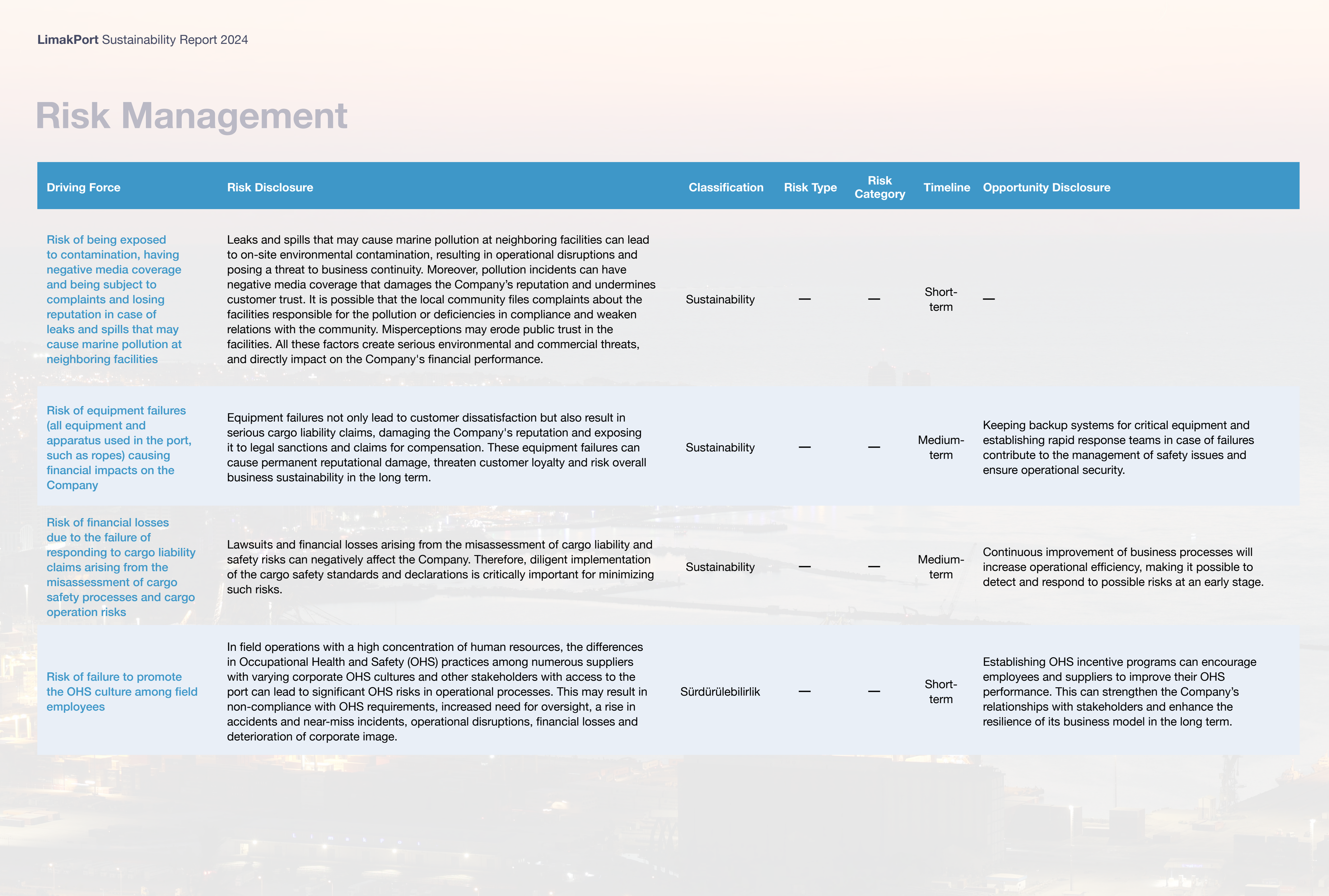
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Driving Force	Risk Disclosure	Classification	Risk Type	Risk Category	Timeline	Opportunity Disclosure
	Risk of being exposed to contamination, having negative media coverage and being subject to complaints and losing reputation in case of leaks and spills that may cause marine pollution at neighboring facilities	Sustainability	—	—	Short-term	—
	Risk of equipment failures (all equipment and apparatus used in the port, such as ropes) causing financial impacts on the Company				Medium-term	Keeping backup systems for critical equipment and establishing rapid response teams in case of failures contribute to the management of safety issues and ensure operational security.
	Risk of financial losses due to the failure of responding to cargo liability claims arising from the misassessment of cargo safety processes and cargo operation risks				Medium-term	Continuous improvement of business processes will increase operational efficiency, making it possible to detect and respond to possible risks at an early stage.
	Risk of failure to promote the OHS culture among field employees				Short-term	Establishing OHS incentive programs can encourage employees and suppliers to improve their OHS performance. This can strengthen the Company's relationships with stakeholders and enhance the resilience of its business model in the long term.

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As LimakPort, we implement international maritime security standards determined by public authorities for port security. We address port security at high standards thanks to procedures and codes designed to detect and prevent security threats that may come from both sea and land. We manage the port security process through the security policy, security committee and designated personnel. We also ensure security measures with physical and electronic precautions such as defining access cards according to the scope of duty.

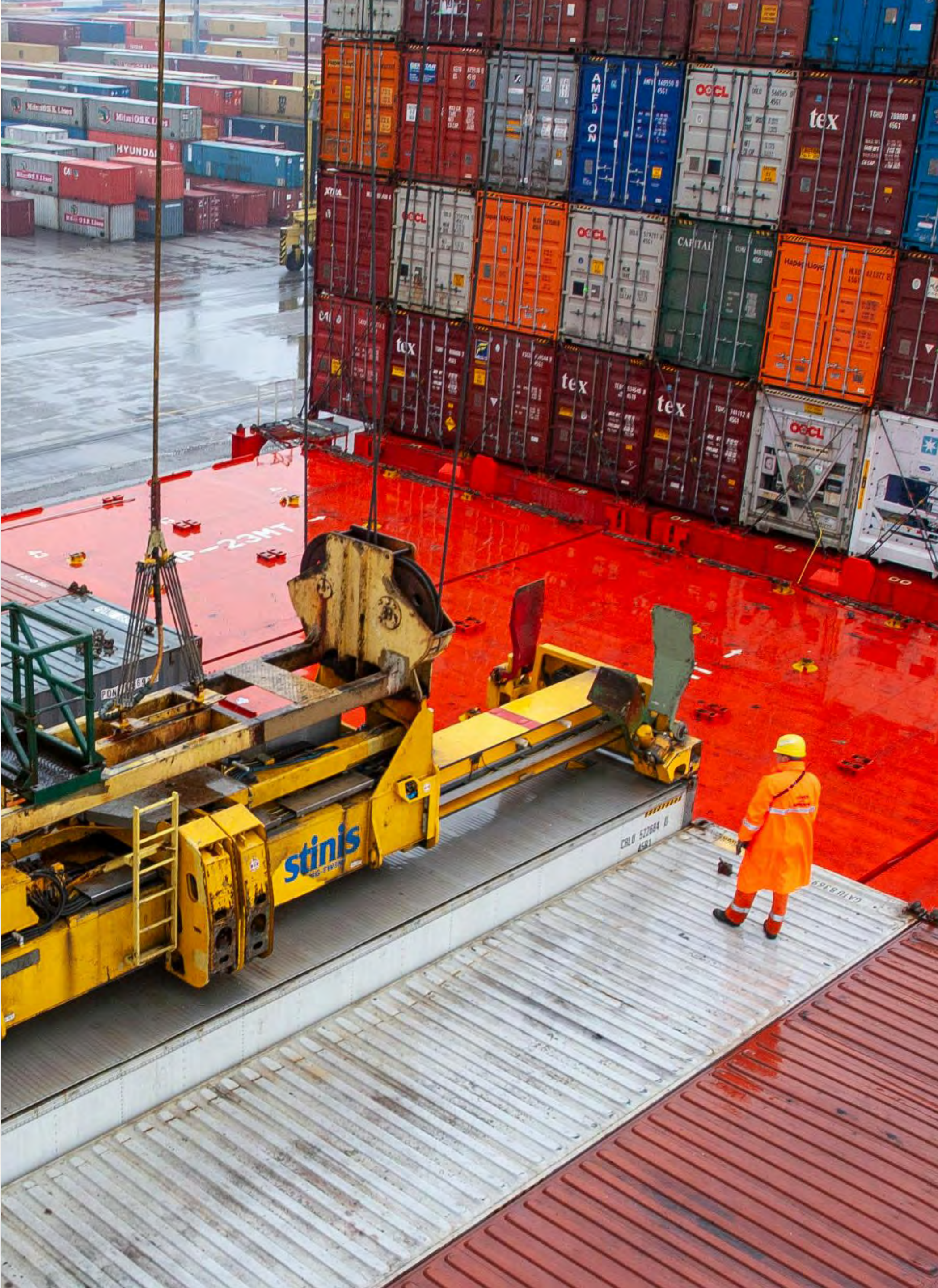
We implement facility security in line with our security procedures, and carry out strict inspections against unlawful activities. We ensure the security of the port facility by planning periodic inspections and drills. We provide our field staff with trainings including ISPS Code (International Ship and Port Facility Security Code) drills, as well as job-specific trainings for employees who are responsible for security. No security breaches occurred at LimakPort during the reporting period covering our operations.

We carry out operational entry-exit and handling processes in compliance with the relevant procedures in order to ensure cargo security within the port. Furthermore, our technological investments to enhance security performance include Smart (Security Management System) handheld terminals and integrated digital programs that enable instant data collection and reporting. We also monitor and control security incidents in real time through surveillance camera systems.

On the other hand, we strengthen our security culture by conducting emergency drills with our employees.

A total of 358 participants attended 5 security trainings we organized in 2024.

Thanks to this integrated approach, we effectively ensure port security and take proactive measures against potential threats.



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At LimakPort, sustainability is beyond being just a responsibility, it is also one of the main indicators of creating the long-term value capacity of our Company. With this approach, we have started to build our sustainability journey upon solid foundations.

We have completed our first sustainability report, embracing an approach that makes sustainability a point to become “**A Gateway to the Future**”. 2024 is a starting point where a corporate framework was created in the area of sustainability, and material topics and main focus areas were determined. In this context:

- **Our material sustainability topics** are defined with a comprehensive external environment analysis and stakeholder opinions, and we determined 16 material topics in total,
- As a result of our materiality analysis, in which we identified the areas we will focus on in our sustainability efforts, we adopted a systematic approach by grouping our 16 material issues under the following focus areas:
 - Governance,
 - Environment,
 - Social,
 - Innovation.

- We have set **short-, medium-, and long-term targets** regarding the material topics we determined.
- We have **created a comprehensive climate and sustainability risk and opportunities inventory** regarding our company operations, and we conducted analysis on it.

To promote a structured, institutionalized and holistically embraced sustainability approach, we developed a **Sustainability Governance Structure to be put into effect by 2025**. This structure will begin its activities to ensure the monitoring of sustainability targets, strengthen integration into internal processes and communication with departments, and provide guidance in relevant areas. You can find details on Sustainability Governance Structure from the [Sustainability Management](#) section.

We are yet at the beginning of our sustainability journey, but we develop through stable steps. We consider integrating sustainability into all our operational processes, effectively managing our environmental and social impact, and communicating more transparently with our stakeholders among our priorities.

This report not only documents the first steps of our journey but also reflects our commitments for the future, because LimakPort is a gateway to the future.

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Sustainability Management

At LimakPort, we define 2024 as a year of strategic transformation in the field of sustainability. To demonstrate our commitment to sustainability, we have taken actions to establish sustainability governance on strong foundations. In order to clearly define and measure our actions, risks, and targets in this area, we have initiated efforts to establish the **Sustainability, Environment and Management Systems Department**, which will operate under the Board of Directors and the General Manager of LimakPort, along with the **Sustainability Committee and Working Groups** reporting to it. In this framework, we aim to create an effective management understanding that will ensure sustainability to be embraced further across our Company.

We aim to structure the governance framework oversight by the Board of Directors to develop policies aligned with the Company’s sustainability targets, to work in coordination with risk management processes, and to monitor sustainability performance. On the other hand, we aim to establish the Audit, Risk and Compliance Committee that will operate under the Board of Directors.

We aim for this Committee and the Sustainability Committee to work in close cooperation and thus effectively identify and manage environmental, social, and governance (ESG) risks. Moreover, we aim to develop projects at the operational level, collect data, and report to the Committee through the Working Groups that will operate under the Sustainability Committee with a focus on ESG. With this structure, we plan to develop a solid sustainability governance both strategically and operationally.

At LimakPort, this structure that we will establish as of 2025 with the aim of making our sustainability strategies an integral building block of our corporate structure will support us in managing our strategic decisions in the field of sustainability more effectively and transparently and in enhancing our Company’s long-term value creation capacity. In addition, it will ensure us to monitor our sustainability performance more systematically, measure the development areas, and implement continuous improvements. So, we aim to strengthen the long-term success of our Company and its responsibility to stakeholders while assessing our environmental and social impacts.

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Our Material Topics

In our first sustainability report, we, as LimakPort, aimed to prioritize the factors that create significant impacts on our stakeholders and the issues related to our own operations. We conducted our first prioritization analysis in order to identify our strategic priorities and determine our focus areas under the sustainability themes.

We shaped this analysis with the contributions of many of our stakeholders, in light of current regulations, national and international standards, mega trends in our sector, and our corporate strategy. We also took into account the impact of developments that shaped the national and global agenda in 2024 on our priorities.

We attached special importance to ensuring that the process had an inclusive perspective. By considering the views and expectations of our stakeholders, we identified our strategic priorities with an approach nourished by different perspectives.

This sustainability report highlights our strategic priorities established based on the results of the analysis and serves as an important guide that will shape our future efforts. The strong participation and collaboration in the process have reinforced our determination to achieve our sustainability targets.

Step 1: Identification of Material Topics

As LimakPort, we examined the reports and outputs published by various organizations, initiatives, and indices (SASB, MSCI, S&P, WEF, UNGC, WBCSD, UN SDGs, etc.) to properly analyze the material topics and the sectoral trends. We conducted a benchmark analysis with good practice examples to determine our focus areas specific to the port management sector. By combining our findings with the LimakPort strategy and our corporate approach, we identified a total of **16 material topics** in the focus areas of environment, social, governance, and innovation.

Step 2: Opinions of Internal and External Stakeholders

In order for 16 material topics to be classified in themselves, we sent online surveys in Turkish and English to our internal and external stakeholders. As a result, we sent our materiality survey to 803 stakeholders in total, including internal and external stakeholders.

• **Internal stakeholders:** Our white-collar and blue-collar employees were asked to evaluate the identified issues in order of importance.

• **External stakeholders:** Key external stakeholders with whom we are in constant communication and who have a high potential impact on our sustainability strategy were identified. The responses collected from 12 different groups, including public institutions, suppliers, customers, non-governmental organizations/associations, universities, Limak Holding, municipalities, certification bodies, law firms, financial institutions, agencies, and other groups, were used as input in the creation of our matrix.

• **Analysis method:** Responses from internal and external stakeholders formed the y-axis of our matrix. Evaluations from LimakPort senior management team provided input for the x-axis.

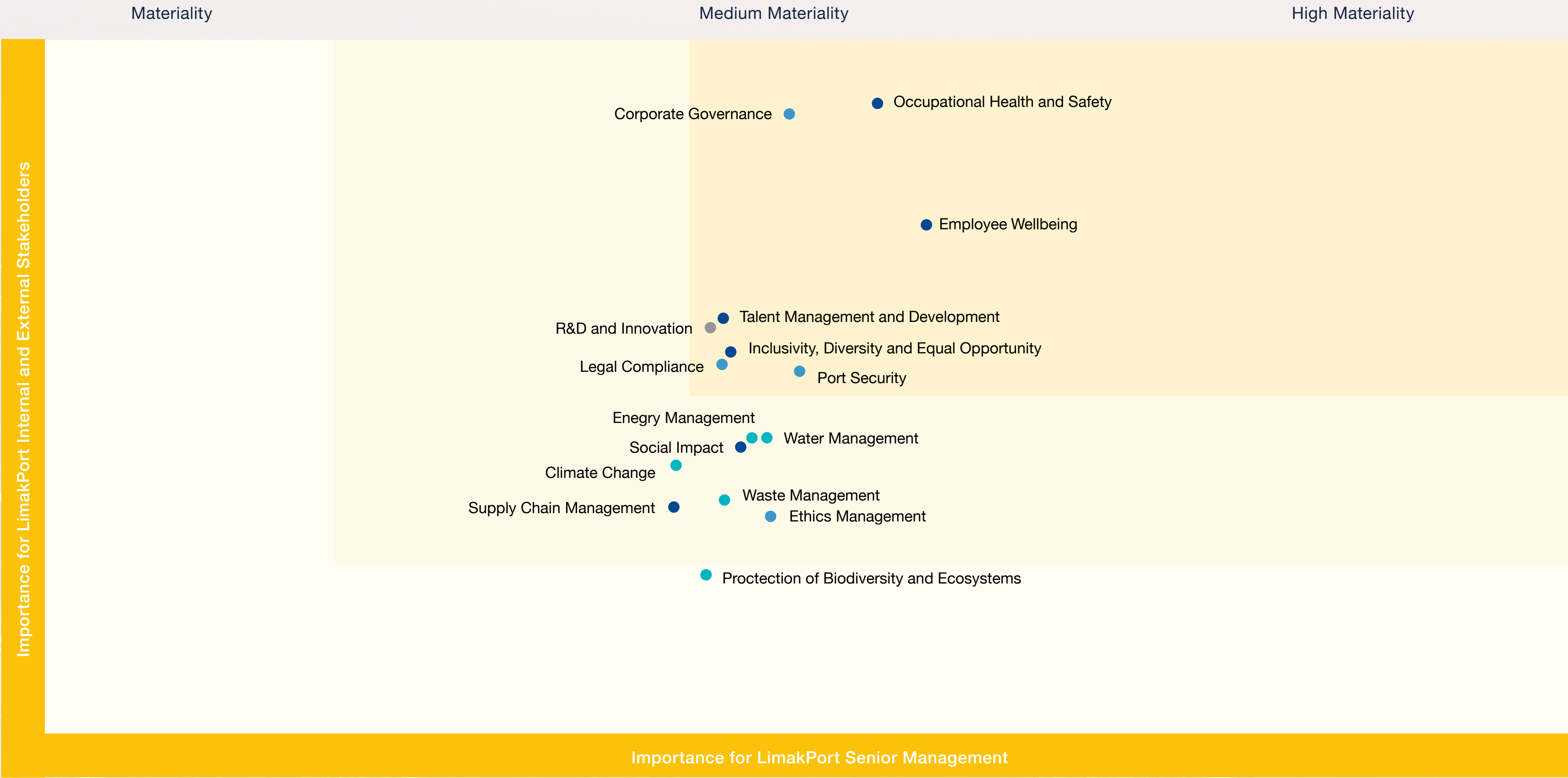
Step 3: Materiality Matrix

By analyzing the scores obtained from internal and external stakeholder surveys, we created our materiality matrix, in which we positioned them on the X and Y axes. Based on the average weight values, we divided our issues into three categories as **High Materiality, Medium Materiality and Materiality**. In addition, we used color codes on the matrix in order to distinguish the topics in the areas of environment, social, innovation, and governance.

Step 4: Senior Management Approval

The prepared materiality matrix was reviewed in detail and approved by LimakPort Board of Directors. In our analysis results, the fact that internal and external stakeholder material topics are largely aligned has been an important indicator of how effectively we are able to convey our targets and vision to our stakeholders. This matrix constitutes the cornerstone of the LimakPort sustainability strategy and guides our future efforts.

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Environment



Social



Governance



Innovation

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Focus Area	Ranking	Material Topic	Explanation
	1	Occupational Health and Safety	It focuses on protecting the health and safety of employees. It aims to identify workplace risks and prevent accidents and occupational diseases. Additionally, it includes legal, technical, and educational measures to ensure safe working conditions.
	2	Corporate Governance	It refers to the Company's corporate governance structure, the management of environmental, social, and governance-focused risks and opportunities, and topics such as transparency, fairness, accountability, risk management perspective, and sustainability risks.
	3	Employee Wellbeing	Practices, standards and human rights policies if any, employee satisfaction surveys if conducted, loyalty scores and similar practices that support employee well-being, happiness and loyalty are evaluated.
	4	Talent Management and Development	Employee-focused management refers to practices that support talent development and aim to increase employee satisfaction. Talent management seeks to develop employees' competencies and support their career growth, while employee satisfaction and loyalty focus on strengthening employees' motivation and commitment to the Company.
	5	R&D and Innovation	This topic refers to digitalization, the integration of processes into business operations, the development of new products, services, and processes, and the improvement of existing processes. It also covers the measures the Company takes against cyber threats, and policies, procedures, and management systems implemented for data protection.
	6	Port Security	It focuses on safety in port operations, as well as practices such as preventive measures and management methods against illegal trade in cooperation with authorized institutions and business partners.
	7	Inclusivity, Diversity and Equal Opportunity	It refers to the Company providing equal opportunities for all employees and creating an inclusive work environment. Gender equality, diversity policies, supportive practices for employees with disabilities, and fair pay policies are evaluated within this scope.
	8	Legal Compliance	It focuses on the Company's compliance with legal regulations, adoption of a transparent and accountable business approach, monitoring compliance with sustainability regulations, informing stakeholders, organizing compliance training, and similar topics.
	9	Water Management	It addresses actions and projects related to managing water use at ports and terminals through proactive and sustainable practices for water conservation and recycling.
	10	Energy Management	It covers actions aimed at energy savings and efficiency, optimizing energy consumption using energy-efficient technologies, and initiatives for the production and use of renewable energy.
	11	Social Impact	It refers to the activities the Company carries out to contribute to social and economic development. Education, health, culture and arts projects, volunteer programs, and partnerships that provide societal benefits are evaluated in this scope.
	12	Waste Management	It refers to circular economy practices where the Company uses natural resources such as water, energy, and raw materials efficiently and promotes recycling of waste. Reducing resource consumption, waste management, pollution reduction practices, and projects are evaluated within this scope.
	13	Ethics Management	It expresses the Company's adherence to ethical principles such as corporate integrity, transparency, anti-corruption, and competitive behavior, reflecting a clear and accountable way of doing business. Actions and policies related to anti-corruption are covered.
	14	Climate Change	It evaluates the practices that focus on preventing, mitigating, and managing negative environmental impacts. It addresses the efforts carried out for the management and reduction of greenhouse gas emissions directly and indirectly caused by the Company's operations.
	15	Supply Chain Management	It refers to the sustainable, ethical, and transparent management of procurement processes. Compliance of suppliers with environmental and social standards, support for local suppliers, and management of supply chain risks are evaluated within this scope.
	16	Protection of Biodiversity and Ecosystems	It expresses the Company's efforts to reduce the impact of its activities on ecosystems. Projects that protect and support the diversity of all species in natural ecosystems are evaluated in this scope.

Interaction with Stakeholders

We do not limit sustainability to environmental and economic performance alone. We consider strong, transparent, and inclusive stakeholder communication as a fundamental component of sustainability. In this context, we systematically identify all internal and external stakeholders directly or indirectly affected by our activities. By maintaining continuous, two-way, and multi-channel communication with these groups, we make our business processes more inclusive and effective. We regularly exchange information with all stakeholders, from our employees to our customers and from public institutions to business partners, using communication methods such as emails, meetings, site visits, digital platforms, stakeholder panels, and formal reporting tools. Through this interaction network, we not only respond to needs but also create a shared transformation ground that contributes to our long-term value creation targets.

Stakeholder Group	Importance for LimakPort	Value Created by LimakPort for Its Stakeholders	Communication Purpose	Communication Method	Communication Frequency
LimakPort Senior Management Team	It is the decision-making body where strategic decisions are made and serves as the key actor in corporate governance and the determination of the long-term vision.	We shape our activities in line with transparency, accountability, and our long-term vision, ensuring the sustainable growth of our Company.	Alignment of strategic objectives and the achievement of sustainable growth.	Emails, Board of Directors meetings, strategy workshops, reportings, field visits	Monthly
White-Collar Employees	It is our most valuable resource, planning and monitoring operational processes and managing digital transformation.	With a continuous improvement approach, we enhance our processes and support digitalization to increase the efficiency of our port services.	Increasing employee loyalty, collecting feedback, and directing efforts toward common targets	Emails, internal communication panels, reporting, meetings, training programs	Continuous
Blue-Collar Employees	It is our core workforce that carries out physical operations in the port area, handling cargo and ensuring safety.	With our occupational health and safety-focused approach, continuous training programs, and inclusive work environment, we strengthen both employee satisfaction and productivity.	Enhancing workplace safety, increasing motivation, and ensuring operational efficiency	Emails, reporting, instant communication tools (walkie-talkie, telephone)	Regular
Public Institutions	It is our key stakeholder guiding operational permits, audit processes, and regulatory compliance.	By fully complying with legal regulations and ensuring transparent reporting and effective coordination, we carry out our port operations safely and sustainably.	Ensuring legal compliance and strengthening sectoral collaborations	Field meetings, notice boards, occupational health and safety trainings	Regular
Suppliers	They are our infrastructure, equipment, maintenance, material and service providers.	With our quality-focused procurement processes, we build long-term relationships and expand our economic impact by prioritizing local suppliers.	Establishing a sustainable supply chain and building mutual trust	Supplier assessment meetings, agreement interviews, emails, digital platforms	Annually / Project-Based
Customers	It is our most essential stakeholder that ensures the continuity of trade and demonstrates the economic impact of port capacity.	We facilitate foreign trade through timely and safe services, digital reservation systems, and customer-focused operational processes.	Increasing customer satisfaction, developing service quality	Customer surveys, call center, emails, visits, digital platforms	Regular / Feedback-Based
Non-Governmental Organizations / Associations	They are the implementer actors whom we collaborate with in the social and environmental impact area.	We work together in social projects in line with our sustainability targets and increase our social impact.	Developing sectoral information share and collaboration opportunities, contributing to environmental sustainability targets	Common projects, workshops, emails, dialog platforms	Quarterly / Project-Based

Interaction with Stakeholders

Stakeholder Group	Importance for LimakPort	Value Created by LimakPort for Its Stakeholders	Communication Purpose	Communication Method	Communication Frequency
Universities	They are our critical academic stakeholders for human resource development and R&D projects.	We add value to the sector through R&D collaborations, internship programs, and information shares, and we support information-based development.	Increasing innovation and information transfer through academic collaborations	Research projects, emails, seminars, conferences	Project-Based / Academic Calendar
Limak Holding	It is our main building block ensuring the strategic power and synergy of our group.	Under the umbrella of the Holding, we act in alignment with our corporate objectives and create value in line with joint investments and sustainability principles.	Creation of shared value, contribution to sustainability targets.	Meetings, common projects, workshops, emails, dialogue platforms	Monthly
Municipalities	They are our public stakeholders with whom we work together in local development, infrastructure arrangements, and social impact management.	With our social responsibility projects and environmental improvement efforts, we act in harmony with the local community.	Ensuring legal compliance and strengthening sectoral collaborations	Official correspondences, meetings, reportings	Quarterly / Annually
Certification Bodies	They are our auditing stakeholders certifying the reliability of our quality, environmental, and occupational health management systems.	We certify our operations with system management in compliance with international standards and validate our sustainability.	Confirming the compliance to legislations and quality standards	Audits, reportings, certification, process meetings	Annually / Certificate Renewal Times
Law Offices	They are our expert stakeholders with whom we collaborate in legal processes and manage our legal risks.	We ensure our corporate security through contract management, regulatory compliance, and legal consultancy processes.	Providing legal consultancy and ensuring compliance with regulations	Official correspondences, meetings, agreement reviews	When needed
Financial Institutions	They are our strategic business partners who support our investments and form the cornerstones of our long-term financial sustainability.	We act in accordance with the principles of responsible investment and secure access to financing through projects that consider environmental and social criteria.	Ensuring financial transparency and strong collaboration	Financial reportings, meetings, digital communication	Quarterly / Annually
Agencies	They are the most important coordination actors in the field for our ship operations.	We increase stakeholder satisfaction with the operational excellence we provide in on-time berthing and departure, cargo planning, and documentation management processes.	Ensuring operational coordination and increasing customer satisfaction	Digital platforms, meetings, emails	Daily/Regular
Media	It is the channel providing transparent information flow.	We provide accurate and transparent information to the public through the media.	Transparent information sharing through the media	Press releases, interviews, media meetings	Regular / Need-Based
Business Partners	Strategic collaborations and project partners	We prioritise creating shared value and long-term cooperation with our business partners.	Strengthening business partnerships and creating shared value	Business development meetings, joint projects, contract negotiations	Regular / Project-Based

Our Sustainability Targets

At LimakPort, we monitor our work in the identified value areas and focus topics on line with short-, medium-, and long-term quantitative and qualitative targets. These targets are regularly monitored by being matched with our material topics, relevant performance indicators (KPIs), and the Sustainable Development Goals (SDGs). Each target is analyzed based on its defined baseline year, and this structure, covering nearly all of our material topics, clearly demonstrates how our sustainability strategy is integrated into our way of doing business.

			Short Term	Medium Term	Long Term	
Material Topic	Relevant KPI	Base Year	2026	2029	2034	Relevant SDG
Climate Change	Emission Quantity (tonne CO ₂ e)	2020	Achieving a 15% reduction in greenhouse gas emissions by 2026	Achieving a 30% reduction in greenhouse gas emissions	Achieving a 60% reduction in greenhouse gas emissions	
Energy Management	Rate of Electric Vehicle Use (%)	2022	Converting 15% of the 36 terminal trucks, 37 forklifts, and 32 passenger vehicles used within the port to electric	Converting 60% of the 36 terminal trucks, 37 forklifts, and 32 passenger vehicles used within the port to electric	Converting all of the 36 terminal trucks, 37 forklifts, and 32 passenger vehicles used within the port to electric	
Energy Management	Percentage of Electricity Consumption Sourced from Renewable Energy (%)	2024	Completing the planning and legal permit processes for SPP	Establishing one SPP and supplying 70% of the electricity consumed from renewable energy, thanks to the SPP	Through the SPP, more than 70% of the electricity consumed is supplied from renewable energy	
Protection of Biodiversity and Ecosystems	The Rate (%) of Conducting Regular Measurement and Intervention Processes Through Seawater and Sedimentation Analysis	2024	Conducting regular measurements to monitor and control the pollution (sediment accumulation) occurring in ship berthing and unberthing areas	Conducting regular measurements to monitor and control the pollution (sediment accumulation)	Conducting regular measurements to monitor and control the pollution (sediment accumulation)	

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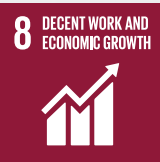
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			Short Term		Medium Term	Long Term	
Material Topic	Relevant KPI	Base Year	2026	2029	2034		Relevant SDG
Inclusivity, Diversity and Equal Opportunity	Female Employee Rate (%)	2024	Protecting the female employee rate	Increasing the proportion of female employees by 5%	Increasing the proportion of female employees by 10%		
Supply Chain Management	Number of Supplier Trainings (#) Supplier Performance Score (#) Number of Suppliers Audited (#) Percentage of Suppliers Audited (%)	2024	The environmental and social assessment of subcontractor companies providing services at the port and the top 50 suppliers with the highest procurement volume	The environmental and social assessment of subcontractor companies providing services at the port and 50% of the suppliers with whom total orders have been placed and active business is conducted	The environmental and social assessment of subcontractor companies providing services at the port and all suppliers with whom total orders have been placed and active business is conducted		
Supply Chain Management	Number of Suppliers (#)	2024	An increase of 2% in the rate of local (regional) suppliers	An increase of 5% in the rate of local (regional) suppliers	Increasing the local supplier rate by 10%		
Employee Wellbeing	Number of Employees Participating in the Survey (#) Survey Participation Rate (%) Employee Engagement/Satisfaction Rate (%)	2023	Maintaining the employee satisfaction rate at 72%	Increasing the employee satisfaction rate by 5%	Increasing the employee satisfaction rate by 10%		
Occupational Health and Safety	Hours of OHS Training per Person (person/hour) Ratio of OHS Training Hour Per Person (%)	2024	Increasing the OHS information trainings provided to all subcontractors offering labor services within the port by 10% compared to the previous year	Increasing the OHS information trainings provided to all subcontractors offering labor services within the port by 10% compared to the previous year	Increasing the OHS information trainings provided to all subcontractors offering labor services within the port by 10% compared to the previous year		
Occupational Health and Safety	Accident Frequency Rate (%)	2024	Decreasing accident frequency by 10%	Reducing the accident frequency by 10% compared to the previous target period	Reducing the accident frequency by 10% compared to the previous target period		
Occupational Health and Safety	Accident Severity Rate (%)	2024	Decreasing accident severity rate by 10%	Reducing the accident severity rate by 10% compared to the previous target period	Reducing the accident severity rate by 10% compared to the previous target period		
Customer Satisfaction	Customer Satisfaction Score (%)	2024	Achieving a customer satisfaction score of 80%	Maintaining a customer satisfaction score of 80%	Maintaining a customer satisfaction score of 80%		

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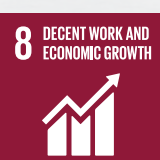
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			Short Term	Medium Term	Long Term	
Material Topic	Relevant KPI	Base Year	2026	2029	2034	Relevant SDG
R&D and Innovation	Environmental-Focused R&D Investment Rate (%)	2024	Investing \$300,000 in environmental-focused R&D activities	Increasing the investment in environmental-focused R&D activities by 5%	Increasing the investment in environmental-focused R&D activities by 10%	
Legal Compliance	Number of Environmental Penalty (#)	2024	Achieving zero environmental penalties	Maintaining zero environmental penalties	Maintaining zero environmental penalties	
Ethics Management	Number of Trainings Provided on Anti-Corruption and Anti-Bribery (#)	2023	Establishing anti-corruption and anti-bribery training	Providing all employees with one anti-corruption and anti-bribery training once a year	Providing all employees with one anti-corruption and anti-bribery training once a year	

Supporting the United Nations Sustainable Development Goals

As LimakPort, monitoring the UN Sustainable Development Goals (SDGs) within the framework of the United Nations Global Compact and contributing to these goals holds an important place in our core strategic framework.

At every stage of our sustainability journey, we aim to increase the value we create for our company and key stakeholders. We follow international standards and developments while setting our sustainability targets. In this context, we focus on areas where we can be most effective in conducting operations contributing to the United Nations Sustainable Development Goals in our strategy development processes. These commitments reinforce our determination for sustainable growth by linking our sustainable value-creation activities to the relevant SDGs. They allow us to contribute significantly to a more equal and resilient future.



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Protection of Biodiversity and Ecosystems

The earthquake centered in Kahramanmaraş on 6 February 2023, had direct and indirect impacts on our area of operations. This situation has caused certain year-on-year deviations particularly in our water consumption, energy consumption, and emissions data. The main reason for the differences in the relevant indicators for 2023 is that this disaster affected our operational processes.

We respectfully commemorate all individuals affected by the disaster.



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Climate Change

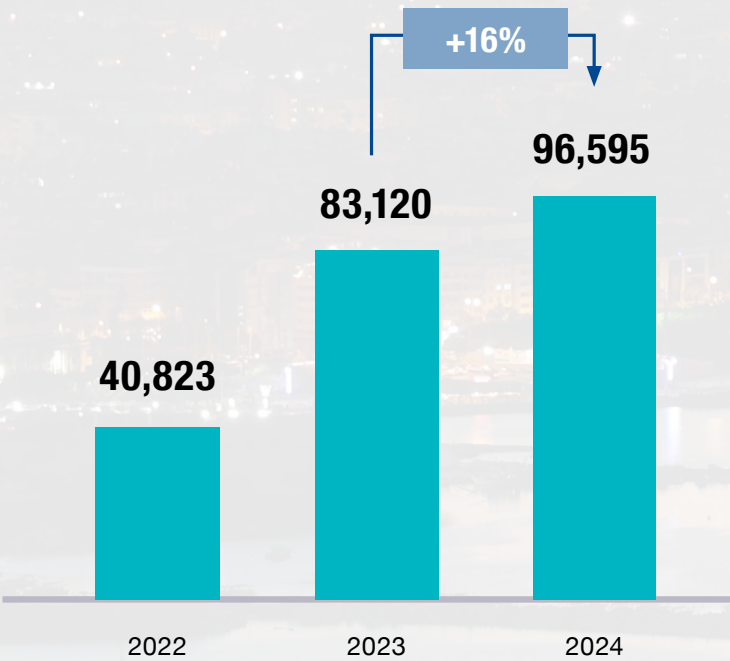
The year 2024 has been one in which rising global temperatures, the frequency of extreme weather events, and the pressure on ecosystems, in short, the effects of climate change have become even more evident. As underlined in the Global Risks Report²⁰ published by the World Economic Forum (WEF) this year, extreme weather events due to climate change rank among the most important risks faced by our planet and the society. So much so that an important threshold was crossed this year in the context of climate change. The report²¹ published by the World Meteorological Organization states that 2024 went down in history as the hottest year ever recorded in 175 years of data.

Rising temperatures, extreme weather events, and the depletion of natural resources are creating new risks by affecting many areas such as society, economic activities, and supply chains. In this context, we reshape our operational processes and sustainability targets. We take determined steps to effectively manage climate risks, reduce emissions, and lower our environmental footprint, while focusing on developing solutions that will add value both to our society and to our business within this awareness.

20 https://www3.weforum.org/docs/WEF_The_Global_Risks_Report_2024.pdf
21 <https://wmo.int/publication-series/state-of-global-climate-2024>
22 <https://thinkhazard.org/en/report/3052-turkey-hatay/EH>

In 2024, we made environmental expenditure exceeding USD 96,000 in the areas of waste management, compliance with environmental standards/regulations, and inspection expenses. Our spending increased by 16% compared to the previous year.

Environmental Expenditure (\$)



On the other hand, as an indicator of our sensitivity to the environment in which we operate, we conducted a total of four separate environmental emergency drills in the areas of chemical spill and fire response, as well as marine pollution response. Through these drills, we both increased our level of preparedness against potential environmental risks and strengthened our capacity for rapid and effective intervention. Moreover, in 2024, we did not receive any environmental penalties.

In addition, we have a General Instruction on Environmental Health and Protection and an Environmental Practices Procedure. We operate in compliance with the limits defined under permits valid between 2023 and 2028 for air emissions, noise control, wastewater discharge, and a Waste Reception Facility license. These permits have been granted to us under the Environmental Permit and License Regulation by the Governorship of Hatay, Provincial Directorate of Environment, Urbanization and Climate Change of the Republic of Türkiye.

The Hatay region, where we conduct our operations, is considered to be under the threat of extreme heat according to current modeling. This means that within the next five years, at least one prolonged exposure to extreme heat and related heat stress is expected²². For this reason, we carry out our operations and business processes by taking extreme heat risks into account and implementing the necessary precautions. We carry out studies to make our operations resilient and sustainable against climate change in the long-term. We measure climate risks and conduct risk mitigating activities to minimize climate risks and build a sustainable future. You can find the details of our climate-related risks in the [Sustainability and Climate Risks](#) section.

Environmental Expenditure Over
\$ 96.000

0
Environmental Penalties

4
Environmental Emergency Drills

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Climate Change

Emission Management

In today’s world, as the effects of climate change become increasingly evident, the management of greenhouse gas emissions stands as one of the most important elements of our sustainability approach. Reducing the greenhouse gas emissions generated by our operational activities is not only one of our fundamental environmental responsibilities but also a cornerstone of our long-term business continuity. Data from the World Meteorological Organization shows that the upward trend in global greenhouse gas emissions continued this year and is now nearly three times higher than pre-industrial levels²³. Furthermore, the same report underlines that, on average, about 90% of the excess heat trapped by greenhouse gases is absorbed by the oceans, highlighting its negative impact on marine ecosystems (such as ocean warming, sea level changes, and the disruption of marine life ecosystems).

As LimakPort, we calculate, monitor, follow and report our greenhouse gas emissions regularly in accordance with the internationally recognized ISO 14064 standard. In this way, we ensure that our emissions are managed in a transparent and verifiable manner. By carrying out our activities in compliance with national and international standards, we are working toward a future with a lower carbon footprint and are developing emission reduction projects.

Within the framework of the **ISO 14064 standard** and in line with up-to-date methodologies:

- **Scope 1** covers greenhouse gases emitted from sources under our Company’s control,
- **Scope 2** covers indirect emissions from purchased electricity,
- **Scope 3** covers indirect emissions throughout the value chain, such as supply chain activities, business travel, transportation, and waste management.

By evaluating not only our operational activities but also our entire value chain from an environmental perspective, we have disclosed our environmental impact with transparency and a holistic approach.

Scope 1 Emissions
4,974.5 tonnes CO₂e

We eliminated Scope 2 emissions equivalent to **4,757.36 CO₂e** with I-REC Certificate

Scope 3 emissions of
495.5 tonnes CO₂e

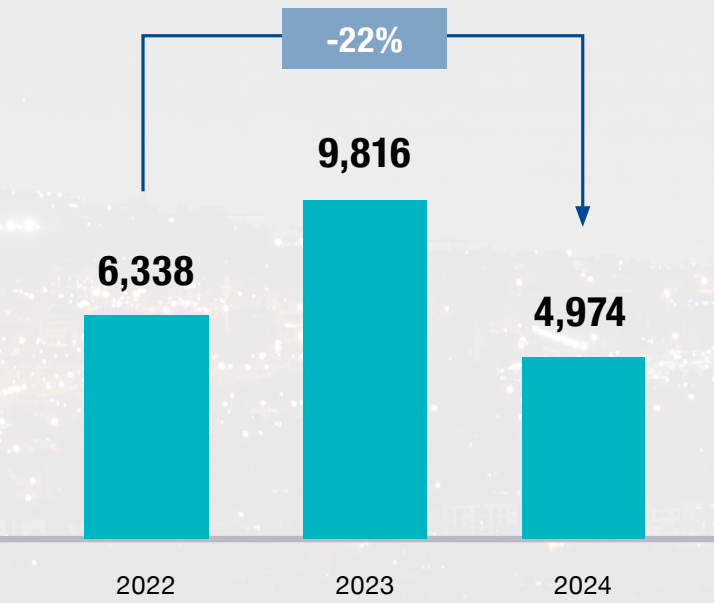
To keep our environmental impacts under control, we obtained our Environmental Permit and License Certificate for Air Emissions under the Environmental Permit and License Regulation from the Governorship of Hatay, Provincial Directorate of Environment, Urbanization and Climate Change of the Republic of Türkiye. This certificate is valid between 18 December 2023 and 18 December 2028. Within this scope, in accordance with legal obligations, we carry out regular emission and imission²⁴ measurements every two years. Through these measurements, we continuously monitor air quality in the field and apply necessary improvements in a timely manner to minimize our environmental impacts.

²³ <https://wmo.int/publication-series/state-of-global-climate-2024>
²⁴ “Imission” is a term used for all gases and particles existing, measured, or inhaled in the atmosphere. It refers to the air pollution in a region. Emission measurements are conducted to determine air quality and pollution levels.

Climate Change

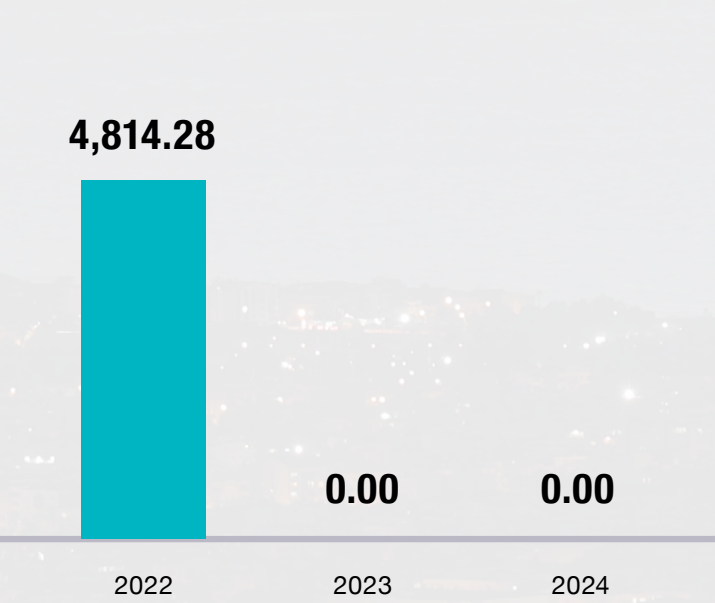
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Scope 1 Emissions (tonnes CO₂e)



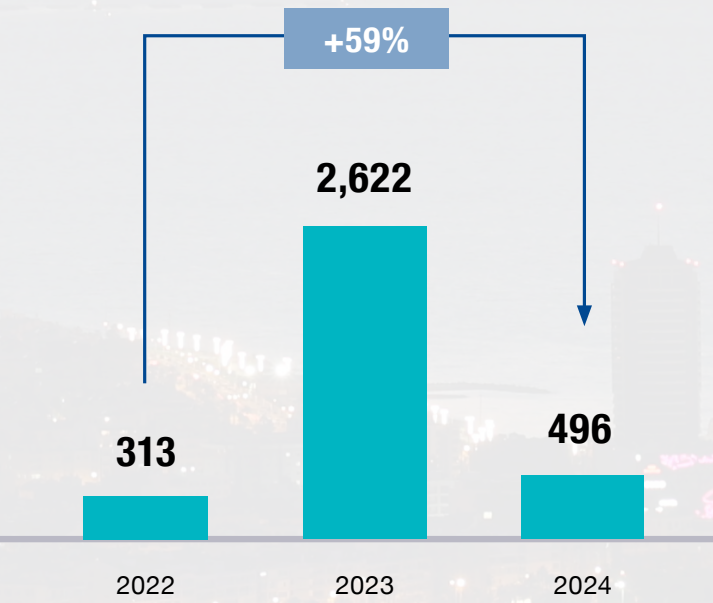
In this context, in 2024, we measured our **Scope 1 emissions as 4,974.5 tonnes of CO₂e**. Compared to 2022, our **Scope 1 emission levels decreased by 22%**. We will continue taking firm steps to decrease this rate in the coming years.

Scope 2 Emissions (tonnes CO₂e)



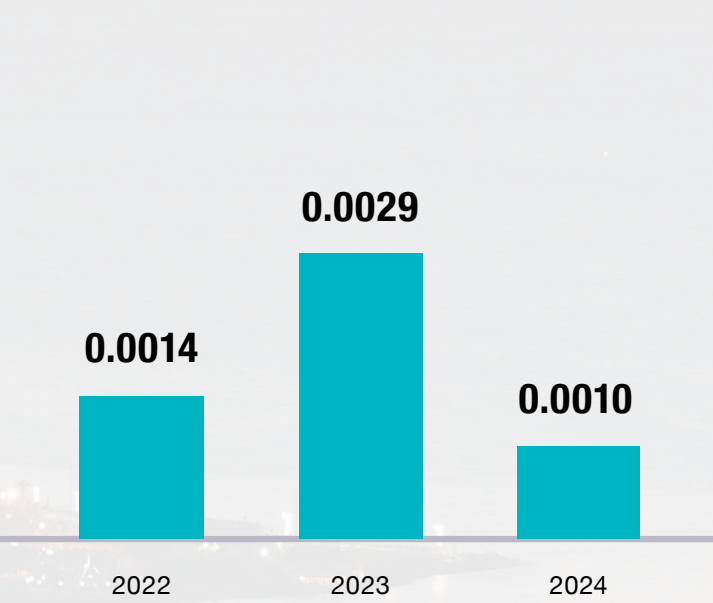
With the YEK-G and **I-REC certificates** we obtained respectively in 2023 and 2024, we generated electricity from clean energy. Thus, **we neutralized all of our Scope 2 emissions equal to 4,757.36 tonnes CO₂**.

Scope 3 Emissions (tonnes CO₂e)



Our Scope 3 emissions were recorded as 495.5 tonnes CO₂e. In 2023, the increase over 50% compared to 2022 was due to the maintenance-repair works continuing in the port following the earthquake.

Greenhouse Gas Emission Intensity (tonnes CO₂e/handled load (tonnes))



In 2024, we measured our Scope 1, Scope 2, and Scope 3 emission density as 0.0010 tonnes CO₂e/handled load (tonnes), but we recorded a decrease by 33% compared to 2022. I-REC certificate we purchased supported us to decrease this rate radically. Our emission calculations play a critical role in realizing our target of reducing our environmental impact and shaping our long-term sustainability strategy.

Our total emission amount in 2024 was 5,470.02 CO₂e.

Emissions	Unit	2022	2023	2024
Scope 1 Emissions	ton CO ₂ e	6,338.06	9,815.82	4,974.49
Scope 2 Emissions	ton CO ₂ e	4,814.28	0.00	0.00
Scope 3 Emissions	ton CO ₂ e	312.59	2,622.03	495.53
Total Emissions	ton CO ₂ e	11,464.94	12,437.85	5,470.02

Compared to 2022, we reduced our Scope 1 emissions by **22%** and our greenhouse gas emission intensity by **33%**.

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Energy Management

The increasing global impacts of climate change and the resulting environmental concerns highlight the need for a profound transformation in energy systems. In this context, sustainable energy transition is considered a critical process that will form the backbone of future energy systems.

Sustainable energy transformation means a fundamental change across all processes, from energy production to distribution and consumption. The aim is to move away from fossil fuels and shift to a system based on renewable energy sources such as solar, wind, hydroelectric, and geothermal. Today, approximately 80% of energy is still derived from fossil fuels²⁵. Therefore, transitioning to clean energy sources is crucial in the fight against the climate crisis.

Effective energy management plays a critical role in achieving our sustainable growth targets. Using resources as efficiently as possible, reducing our environmental impact, and balancing operational costs are among our top priorities. In this regard, we continuously monitor the energy we consume during our operations and assess improvement measures. We aim to develop innovative solutions to increase the use of renewable energy sources and improve energy efficiency.

Moreover, we position energy management, energy efficiency, and clean energy as strategic priorities. In this context, we are conducting the preparation process for our *Energy Management System Policy*. Once the process is completed, we plan to publish it on our website to share it with all stakeholders and third parties.

With the **transition to LED** Indoors-Outdoors, we achieved an energy saving of **599,184 kWh** and a cost saving of **TRY 1,846,978** in total.

Additionally, we aim to conduct awareness training for our employees on Energy Efficiency and Energy Management. Last year, we began converting container handling equipment and lighting fixtures across the port area, both indoors and outdoors, to **LED**. Evaluating the improvement data over two years, we achieved total **energy saving of 599,184 kWh, resulting in a cost saving of TRY 1,846,978**. With this transition, we aim to optimize energy consumption and increase efficiency.

Furthermore, our work on the **ISO 50001 Energy Management System** continues, and we are progressing with the system implementation.

We aim to complete the certification process next year and obtain our certificate.

The determined approach we have adopted in energy management will contribute both to strengthening our environmental responsibility and enhancing our financial performance.

We consider taking actions on energy efficiency and the use of clean energy as a key objective of our sustainable management approach. As part of these targets, **we plan to transform all of the passenger vehicles over 20 we use at the port into electric vehicles**. With the electrical vehicle transition process, we aim to reduce emissions from fuels and to provide both environmental and economic benefits through lower energy costs. This transformation encourages sustainable transportation at the port area and reinforces our investments in renewable energy infrastructure.

We plan to transform all of the passenger vehicles over 20 we use at the port to electric vehicles

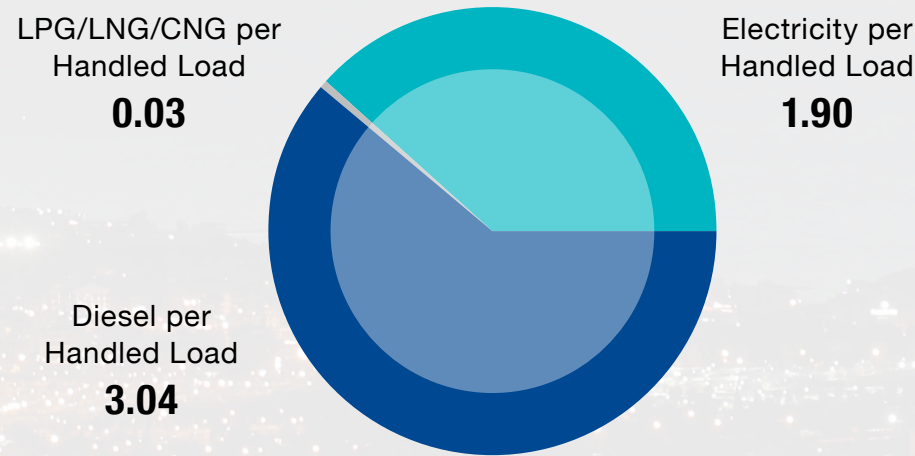


25 <https://climatepromise.undp.org/news-and-stories/what-sustainable-energy-transition-and-why-it-key-tackling-climate-change>

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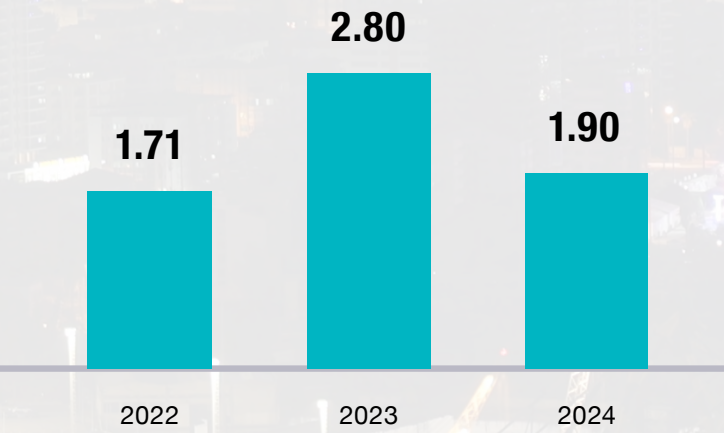
Energy Distribution (kWh/handled load)



When we examine energy consumption in 2024, the highest share is from diesel consumption. The share of diesel consumption in total energy consumption was recorded as 61%.

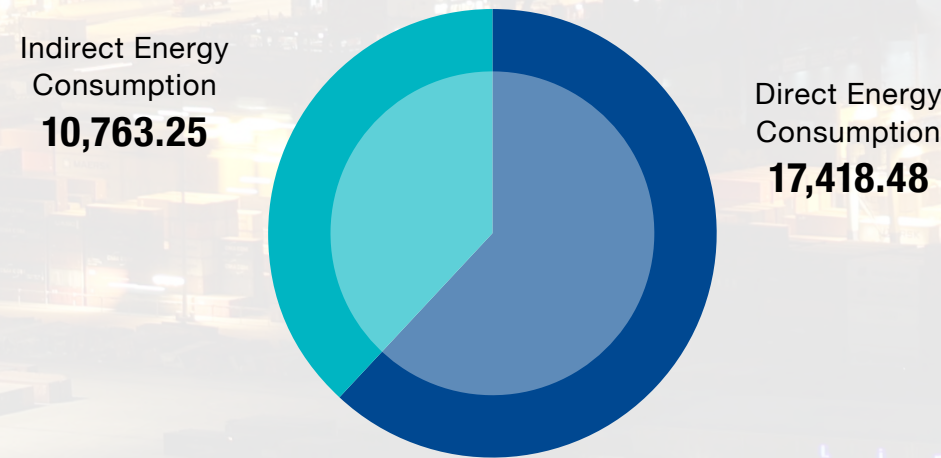
In 2024, electric consumption of 10,763 MWh was 1.90 per handled load. When we consider the electric consumption per handled load, this year, **we supplied all the electricity we consume with I-REC from renewable energy resources** thanks to the purchase of I-REC of 10,764 MWh despite an increase of 11% compared to 2022.

Electricity Consumption per Handled Load (kWh/handled load (tonnes))



This year the total energy consumption is 28,181.73 MWh. Beyond ensuring indirect energy consumption with the purchase of I-REC certificated electricity, we continue our SPP investments to produce energy from renewable energy sources.

Direct & Indirect Energy Consumption in 2024 (MW)



Energy Consumption (MW)	2024
Direct Energy Consumption	17,418.5
Indirect Energy Consumption	10,763.25

Electrical Vehicle Transformation Project

We are taking actions to replace the vehicles and forklifts used in our field operations with more environmentally friendly alternatives. Within this scope, we are carrying out a project that aims to gradually convert vehicles powered by internal combustion engines into electric models.

With this project, which we plan to complete by 2031, we aim both to reduce our carbon footprint and to increase our energy efficiency year by year. We are implementing the transformation process gradually, taking into account operational needs and infrastructure requirements.

Key Achievements

- 21 vehicles and forklifts will be replaced with electric alternatives.
- We anticipate achieving a 40% reduction in carbon emissions.
- We are taking our place in the electrification transformation and developing environmentally friendly practices.

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As part of our energy efficiency efforts, we use 4 regenerative Ship-to-Shore Gantry Cranes (SSG) and 13 Rubber-Tired Gantry Cranes (RTG) in our port area. These cranes recover the energy generated during operations and feed it back into the system, providing significant energy savings.

As of 2024, we achieved a total **energy saving of 831,970.13 kWh** with these cranes and **prevented the generation of approximately 368 tonnes of CO₂ emissions**. This is an important step for us both in terms of contributing to environmental sustainability and reinforcing our efficiency focus on energy management.

As of 2024, with our regenerative cranes, we achieved a total energy saving of 831,970.13 kWh and prevented the generation of approximately 368 tonnes of CO₂ emissions.

Renewable Energy

The current energy system accounts for an average of 75% of total greenhouse gas emissions This is one of the main causes of global climate change²⁶. As the trend of rising temperatures reaches record levels every year, it is of great importance that energy production and consumption processes undergo fundamental change.

Both countries and companies are accelerating their investments in this field. According to data from the International Energy Agency, between 2024 and 2030, the construction of new large solar power plants and the installation of solar panels on rooftops of companies and households are expected to increase. In this context, it is projected that solar power plants will account for 80% of the growth in global renewable energy capacity²⁷.

To reduce our carbon footprint from electricity consumption, we meet a certain portion of our energy needs from renewable sources.

In this framework, through internationally recognized I-REC (International Renewable Energy Certificate) certificates, we certify that we have sourced a total of **10,763,252 kWh** of electricity from renewable energy sources. Thanks to the I-REC certificate we hold, we operate a transparent, traceable, and verifiable method to offset the environmental impacts of the electricity we consume. In this way, **we reduce our Scope 2 emissions to zero**. This practice supports our contribution to a low-carbon energy transition in line with our sustainability targets.

As LimakPort, we aim to reduce our energy dependency by increasing our investments in renewable energy. In line with our renewable energy targets, we are carrying out project design and legal permitting processes for the installation of a **Solar Power Plant (SPP)**. By completing the process in 2026, we anticipate that in the medium term, this facility will enable us to **source 70% of our electricity consumption from renewable energy sources, compared to our 2024 consumption level**.

²⁶ <https://www.wri.org/insights/4-charts-explain-greenhouse-gas-emissions-countries-and-sectors>
²⁷ <https://www.iea.org/energy-system/renewables/solar-pv>

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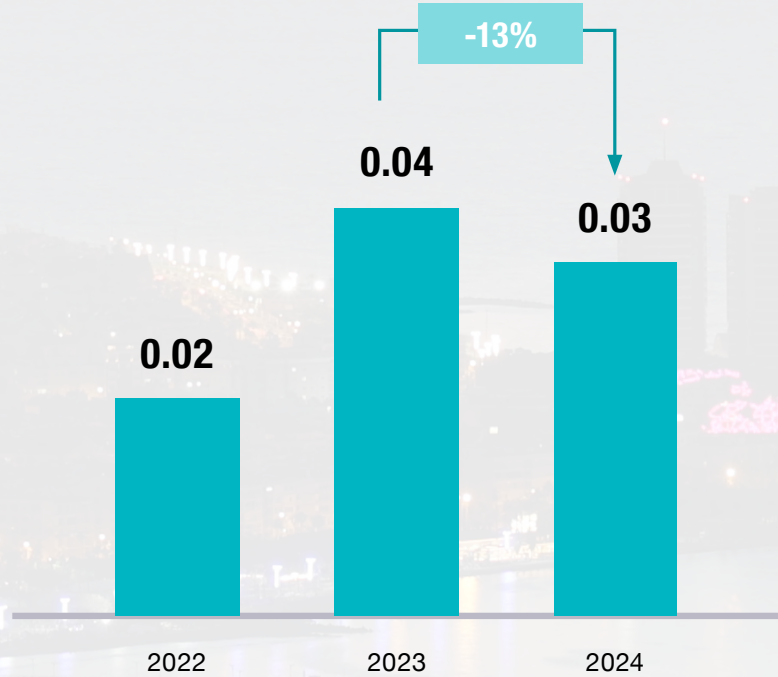
Water Management



Today, global water resources are under significant pressure. As the global population grows rapidly, it is projected that if current water use habits continue, there will be a significant 40% gap between water demand and supply by 2030²⁸. Research shows that by 2050, the Gross Domestic Product (GDP) worth USD 70 trillion will be exposed to high water stress²⁹. Chronic water scarcity, floods, and droughts are considered among the greatest risks in terms of welfare and stability.

As LimakPort, we operate with an awareness of the global water stress and manage water use from a sustainable perspective. With the two wastewater treatment plants located in our port area, we contribute to environmental sustainability. We treat rainwater collected in the ore stockyard at a wastewater treatment plant with a capacity of 4,320 m³/day before discharging it into the sea. In this way, we prevent ore loads from polluting the sea. The wastewater resulting from the dehydration process of bilge waste received from ships is treated at our wastewater treatment plant with a capacity of 100 m³/day before being discharged into the sewer system.

Water Consumption per Handled Load (m³/handled load)



Our total water consumption was recorded as 181,607 m3 this year. On the other hand, as part of this total consumption, we supplied 10,098 m³ of water to ships docking at our port. When we evaluate our water consumption per tonne of load handled, we achieved a 13% decrease compared to the previous year. As of 2023, there was a significant increase in water consumption compared to the previous year.

Among the main reasons for this increase were the firefighting operations carried out to control fires that broke out following the earthquake disaster in 2023. These firefighting activities required the use of large amounts of water on a temporary basis. In addition, increased irrigation to prevent dust formation in the field and ongoing maintenance and repair activities were other important factors affecting total water consumption.

We also use sensor-activated water taps in common areas to reduce resource consumption. This practice prevents unnecessary water consumption, providing both environmental and economic savings.

These investments based on new technology represent an important step in achieving our environmental sustainability targets. While realizing our targets on the efficient use of resources, they also provide concrete contributions.

28 <https://www.worldbank.org/en/topic/waterresourcesmanagement>
29 <https://www.wri.org/research/aqueduct-40-updated-decision-relevant-global-water-risk-indicators>

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Waste Management

Sustainable waste management represents an important process to prevent environmental impacts. Today, it is estimated that the global waste amount increases rapidly, that the waste production of 2.1 billion tonnes in 2023 will reach up to 3.8 billion tonnes by 2050. At the same time, while the direct and indirect costs of waste management continue to rise, it is projected that annual costs will reach up to USD 640 billion by 2050 if urgent measures are not taken³⁰.

In this context, the circular economy model emerges as a critical approach for waste prevention and efficient use of resources. The circular economy aims to extend the life cycle of products as long as possible by focusing on sharing, reuse, repair, refurbishment, and recycling in production and consumption. In this way, even when products reach the end of their life, materials remain in the economy and enable the creation of new value through reuse. Unlike the linear economy model, the circular economy seeks to ensure the sustainability of resources and minimize waste instead of the “take, make, use, dispose” approach.

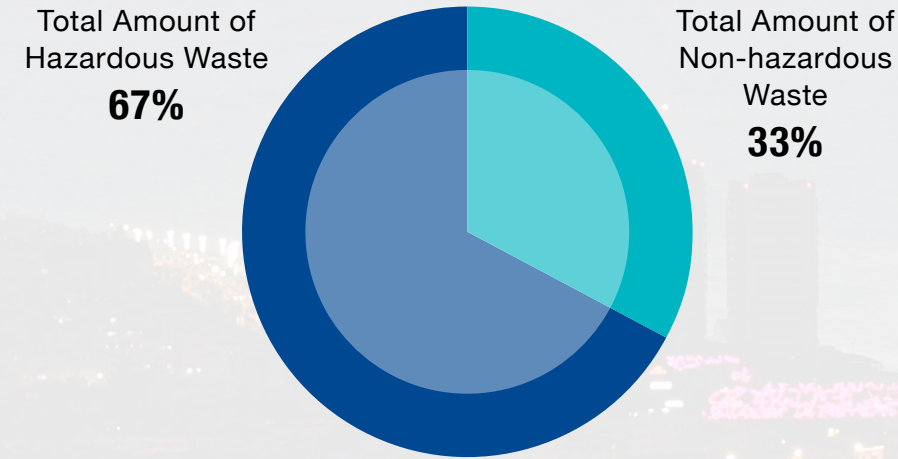
As LimakPort, we act with a sense of responsibility in waste management. In line with our **Waste Management Procedure**, we manage our waste in a responsible and effective manner that is sensitive to the environment and human health. We place importance on segregating our waste and directing it to authorized companies for disposal and recycling processes.

In addition, within the scope of on-the-job trainings and programs we carry out at regular intervals, we provide our employees with training and regular updates on zero waste and waste management. Our waste management approach both reduces our environmental impacts and contributes to our sustainable waste management targets.

In 2024, our total hazardous waste amounted to 1,546 tonnes, while our non-hazardous waste was recorded as 767 tonnes.

Waste	Unit	2024
Total Amount of Hazardous Waste	tonnes	1,546.46
Total Amount of Non-hazardous Waste	tonnes	767.72

Hazardous/Non-hazardous Waste Distribution in 2024 (tonnes)



97% of our hazardous waste consists of sludge and bilge waste. This reveals the hazardous waste profile resulting from our operations. **In the waste facility located at our port, we carefully segregate and collect bilge and sludge waste from ships, managing it without causing harm to the environment.** In 2024, we collected 1,501.32 tonnes of bilge (122.68 tonnes) and sludge (1,378.64 tonnes) waste from ships. We process all of this waste in energy recovery systems designed to minimize environmental impacts. In this way, we both prevent the direct disposal of waste and contribute to the circular economy.



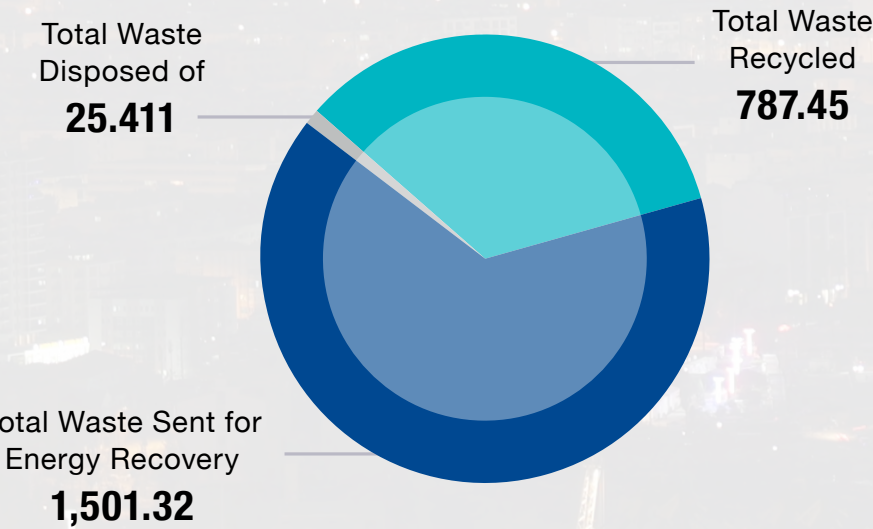
30 <https://www.unep.org/resources/global-waste-management-outlook-2024>

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Waste Management

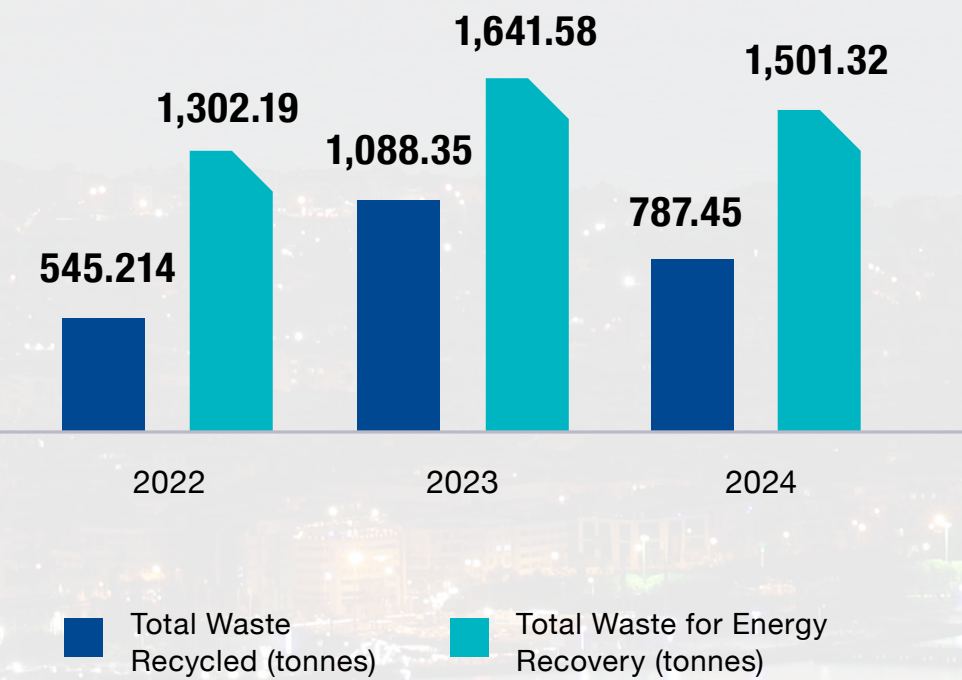
On the other hand, we recycled all of our 767 tonnes of non-hazardous waste generated in 2024. This recovery-oriented approach is one of the fundamental elements of our waste management strategy. It also plays an important role in line with our sustainable environment targets and efficient use of resources.

Waste Distribution in 2024 (tonnes)



In 2024, the amount of waste we disposed of was recorded as 25.41 tonnes. Meanwhile, we recycled 787.45 tonnes of waste. When we evaluate the ratio of recycled waste to total waste, we observe that 34% of the waste was recycled.

Annual Waste Recycling and Energy Recovery (tonnes)



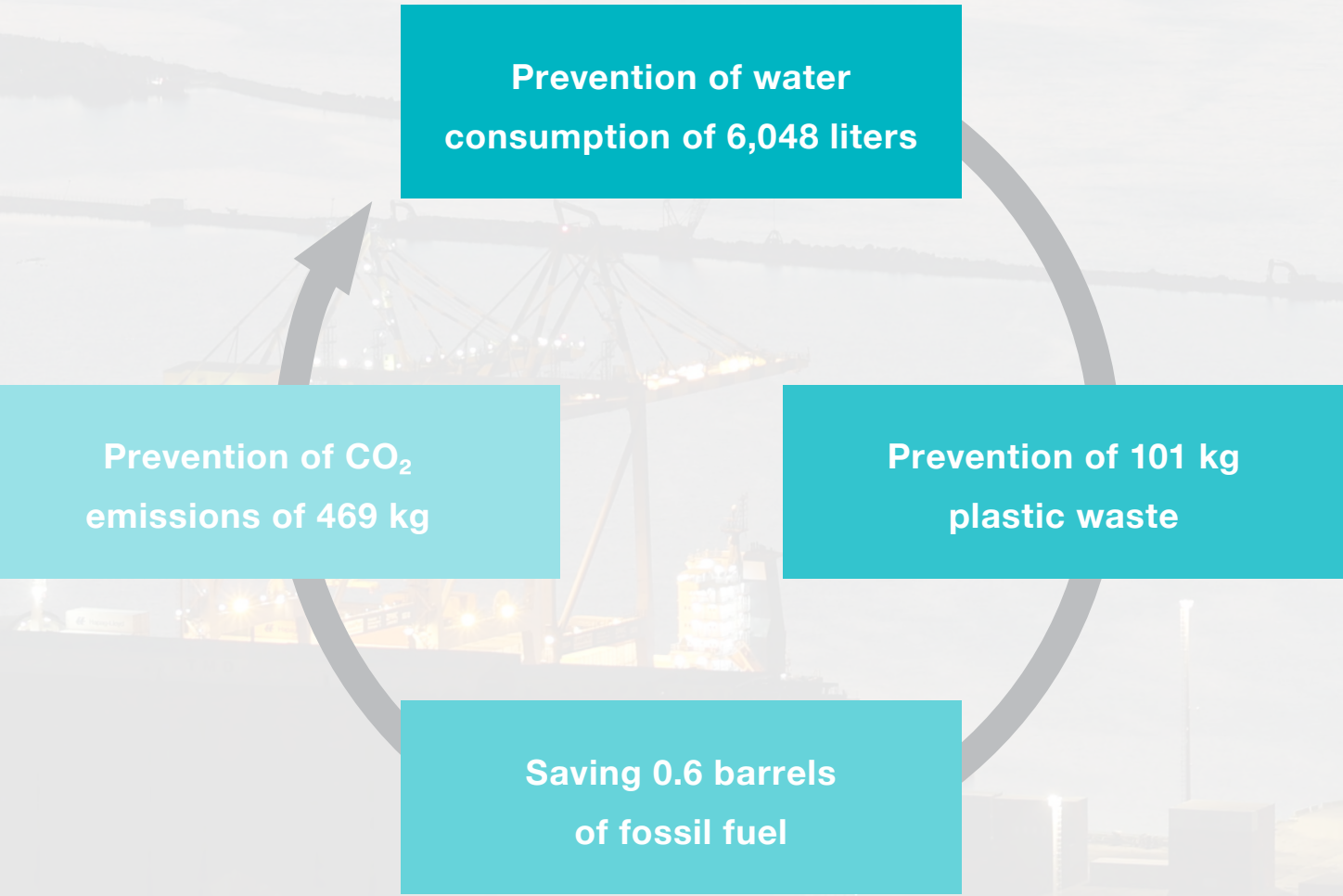
Moreover, compared to 2022, we achieved a 44% improvement in the amount of waste recycled and a 15% improvement in the amount of waste sent for energy recovery. Compared to 2022, we managed to reduce our total waste by 387.7 tonnes.

Pollution Management

Pollution is increasing due to variables such as rapid economic growth, population growth, and inadequate environmental management practices. This situation severely affects people and ecosystems, especially in low- and middle-income countries, and poses health risks. According to World Bank data, the global economy relies on interconnected supply chains sustained by more than 100 billion tonnes of raw materials entering the system each year³¹.

In line with our sustainable resource management approach, we commissioned the **New Technology Closed-Loop Treatment System** at our port area, which aims to reduce environmental impacts. The system, launched with a total of **65 treatment devices**, provides versatile benefits such as saving water and energy, as well as reducing waste generation and pollution.

Annual Environmental Benefit per Treatment Device Instead of Annual Average per Treatment Device



³¹ <https://www.worldbank.org/en/topic/pollution>

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Protection of Biodiversity and Ecosystems

Biodiversity forms the building block of healthy ecosystems ensuring the continuity of life on our planet and plays a critical role in maintaining natural balance. Protecting biodiversity ensures the continuity of vital matters such as fresh air and water, pollination, and climate control.

The report prepared by the **World Wide Fund for Nature (WWF)** reveals that current national commitments and efforts are not sufficient to achieve the established targets and to prevent dangerous thresholds³². In line with the global biodiversity framework’s target of protecting 30% of our planet’s land, waters, and seas by 2030, it is known that effective protected areas need to be significantly expanded. The same report states that today 16% of land and 8% of oceans are under protection. This clearly demonstrates the urgency of actions to be taken in the coming period.

The loss of biodiversity is not only an environmental issue but also a key concern that directly affects human health, livelihoods, and the sustainability of life. In fact, the coastal and marine ecosystems, which can be directly affected by port operations, provide habitats for various species. For this reason, protecting and supporting biodiversity in our areas of operation is among our material focus areas.

In this context, we commit to carrying out regular monitoring and assessment activities to minimize the environmental impacts of our port operations, ensure the protection of habitats, and track our impacts on biodiversity.

As part of our short-term targets, we adopt conducting regular measurement and monitoring studies to minimize the environmental and operational impacts of sedimentation (accumulation of deposits) in vessel berthing and departure areas. In this way, we aim to manage the accumulations occurring on the seabed without disrupting port operations and to keep potential impacts on the ecosystem under control.

Marine Life Protection

Marine pollution is largely caused by the combination of chemicals and waste reaching the seas from land, and cause serious damage to marine ecosystems. Marine pollution negatively affects the health of marine life, biodiversity, water quality and the overall ecosystem balance, as well as impacting economic activities such as port operations, fishing, tourism, and maritime transport on a global scale³³.

Changes in coastline and marine use on a global scale have a significant impact on marine biodiversity. Increased development along the coastline and activities such as aquaculture in the open sea affect the health of marine life. On the other hand, climate change has become an increasingly threatening factor for marine ecosystems. Research shows that oceans have absorbed 93% of the excess heat generated by climate change since the 1970s, leading to rising sea temperatures³⁴.

As a company in the port operations sector, we see the reduction of marine pollution and the protection of marine ecosystems as a fundamental component of our environmental responsibility. Accordingly, we consider our primary targets as minimizing the impact of our activities on the marine environment, effectively managing waste, and developing sustainable port practices.

We did not receive any environmental penalties by fully complying with environmental regulations during 2024. This is a strong indication of our commitment to environmental performance and sustainability targets.

Our 24/7 emergency team is always ready to respond to potential spills for the purpose of protecting life at sea and keeping our seas clean. We also **continuously develop our team’s competence by providing regular trainings and drills on emergency response to marine pollution.**

Moreover, we aim to monitor seawater quality regularly and scientifically within the framework of protecting the marine environment, thus increasing our capacity to take precautions through continuous monitoring of environmental impacts in our operation areas.

32 <https://livingplanet.panda.org/>
33 <https://education.nationalgeographic.org/resource/marine-pollution/>
34 <https://www.nrdc.org/bio/lauren-kubiak/marine-biodiversity-dangerous-decline-finds-new-report>

Innovation and Digitalization

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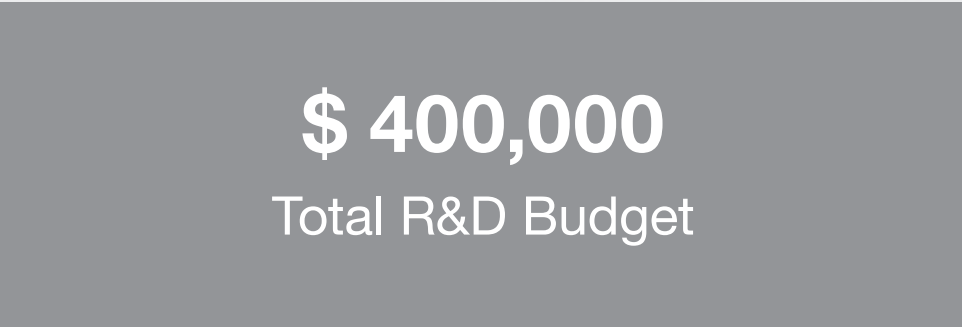
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R&D and Innovation

As LimakPort, we consider and prioritize R&D and innovation activities in our service strategy, and carry out works as needed to achieve these targets. We aim to develop safe, digital and efficient solutions by effectively utilizing existing technologies with our R&D approach.

In the field of port services, we adopt R&D and innovative operational solutions as well as prioritizing automation and safety. The solutions we started to offer in 2024 include RTG terminals, the PreGate automated access control system, and early warning and alert systems against potential threats. RTG systems are used to transport and store containers in our terminal operations, ensuring efficient and safe operations. Another project, the PreGate automation access control system, prioritizes terminal security and enables authorization and access at gate entrances using RFID cards. Therefore, entry and exit records are kept and security protocols are implemented. We also use microcontroller cards to enhance our terminal operations with automation. These cards allow us to strengthen our services with automation systems by using the sensor infrastructure, and to continue our efforts to increase operational efficiency.

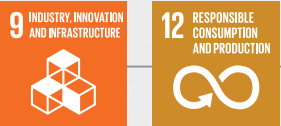
We aim to accelerate workflows and strengthen our operational excellence by creating an integrated system with innovative solutions focused on operational safety.



We aim to invest USD 300,000 in the short term in environment-focused R&D activities as well as increasing this amount by 5% in the medium term by 10% in the long term for the purpose of ensure the continuity of innovative activities in the future.

In addition to automation, we also incorporate digitalization and artificial intelligence into our operations. Thanks to AI-supported applications, our employees save significant time in data analysis, forecasting, documentation and decision support processes, and improve our operational quality. We aim to continuously improve our competitiveness and service quality by integrating these technological innovations into our operational processes.

Terminal Truck



We continue our efforts to implement the Terminal Truck project in 2026. With this project, we plan to monitor and manage our vehicles in real time in order to maximize on-site transportation efficiency, allowing us to assign vehicles to the nearest job and minimize empty travel times. We seek to coordinate quay operations using a dual-cycle method, increase loaded travel times, and to optimize unloading and loading processes through dynamic assignment by serving multiple ships simultaneously. Therefore, we plan to ensure the traceability of our equipment, significantly increase operational efficiency, and save on fuel.

Investment Cost: USD 250,000

Key Achievements:

- We anticipate an 8% improvement in field internal transport vehicle movements.
- We expect to gain approximately 3 vehicles on a daily basis, taking the dynamic variability of the port into account.
- We aim for a 25% improvement in field internal transport vehicle movements by 2027.

Cyber Security and Information Security

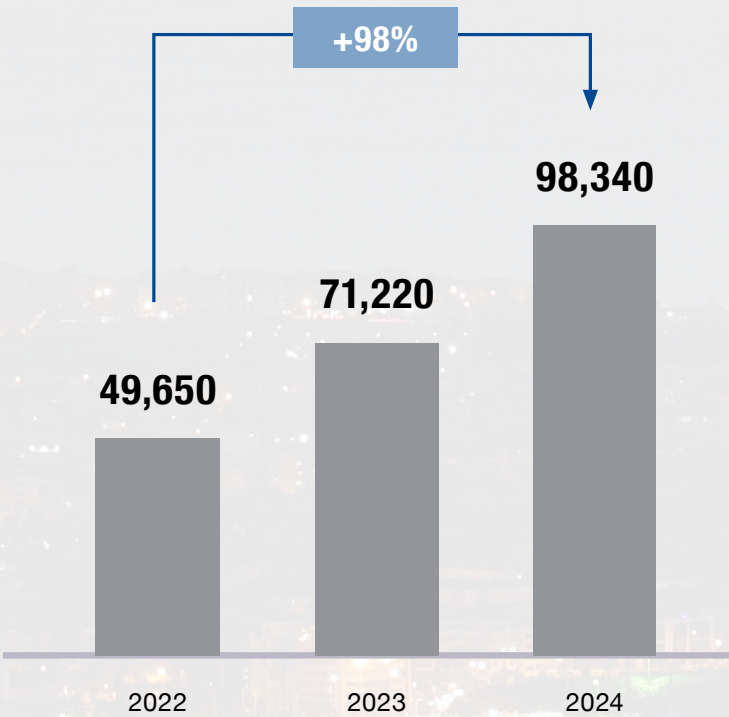
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We strengthen our service and operational areas with our projects and innovative solutions prioritizing cybersecurity and information security.

Accordingly, we increased our information security budget by 98% from 2022 to 2024. First, we strengthened access to critical infrastructure by implementing infrastructure investments such as CCTV and card access systems. We also continue our efforts to make our employees active and effective in this area by organizing PDPL trainings and cybersecurity awareness reminders to increase our personnel’s awareness and ensure compliance with regulations.

Information security is one of the areas we attach importance to in our operations. We send consent forms along with all the information we store, and also actively monitor outgoing data elements from our database. Thanks to the DLP (Data Loss Prevention) software we use, the system automatically sends an email notification when defined rules are violated, and screenshots of the violation are recorded. We also ensure the security of our network through antivirus and firewall software to prevent possible attacks to our database from outside.

Total Information Security Budget (TRY)



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The earthquake centered in Kahramanmaraş on 6 February 2023, had direct and indirect impacts on our area of operations, causing certain deviations in our employee trainings and occupational health and safety performance indicators on an annual basis. The differences in the relevant indicators for 2023 are due to the impacts of this disaster on our operational processes.

We respectfully commemorate all individuals affected by the disaster.



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Employee Wellbeing

As LimakPort, we see our human resources not only as part of our operational strength but also as the pillars of our corporate culture and key actors in our strategic vision. We prioritize increasing the wellbeing, happiness and loyalty of our employees in all our activities. We strive to build a participatory and development-oriented corporate culture shaped by ethical values.

Within the framework of our *Integrated Management System Policy*, our fundamental commitments include increasing employee satisfaction, ensuring the highest level of occupational health and safety, adopting unconditional adherence to human rights as a core principle, and upholding the principles of diversity and equal opportunity. We believe that “**quality is not a choice, but an obligation for us**” and accordingly, we see employee wellbeing as an integral part of our sustainability in all processes.

A Work Culture Based on Ethics and Respect for Human Rights

We provide a fair, safe and dignified working environment to all employees by adopting respect for human rights as a fundamental principle in our business life. We adhere to the *Code of Business Ethics* of Limak Group of Companies, and shape our practices accordingly:

- We never allow the employment of individuals under 18.
- We do not accept the forced or compulsory labor of any individual during the recruitment process or employment term.
- Our zero-tolerance policy against child labor is implemented not only within our Company but also extends to all suppliers we cooperate with.
- We verify the legal compliance of our suppliers by requesting documents such as tax certificates, trade registry gazettes and Social Security Institution (SSI) records. We regularly monitor situations that pose a risk of child labor through SSI checks. Contractors found out to be engaged in child labor are prohibited from accessing the port area in order to prevent the recurrence of such cases. We continue our efforts to increase contractor responsibilities in coordination with our Human Resources and Procurement departments.

Our Employee Satisfaction and Loyalty Practices

Key elements that enable sustainable success include employee satisfaction and loyalty to our Company. We managed to maintain our employee satisfaction rate at 72% as of 2023. For the upcoming period, we aim to increase this rate by 5% until 2029 and by 10% until 2034.

We strive to continuously improve the workplace environment and foster a participatory management approach through regular surveys for collecting our employees’ opinions and suggestions.

We place great importance on establishing open communications based on trust with our employees. Accordingly, LimakPort’s human resources strategies were guided by the results from the satisfaction and loyalty surveys conducted by Limak Holding in 2023.

We regularly monitor needs and expectations specific to our port through one-on-one meetings with managers, feedback meetings, and requests submitted through the Human Resources department. With this approach, we develop sustainable practices to increase loyalty to our Company and continuously improve wellbeing.

Our Equitable and Inclusive Human Resourced Policy

We conduct all our human resources processes, such as recruitment, remuneration, career development and performance evaluation, based on the Limak Group’s *Human Resources Policy* and on the principles of equality and merit. We create an environment where every employee can freely realize their potential in accordance with our gender equality policy.

Respecting personal space, taking ideas and suggestions into consideration, ensuring psychological safety and increasing employee engagement lie at the center of our management approach. We are aware that each colleague makes valuable contributions to our corporate development.

Employee Wellbeing

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We support our employees in maintaining a healthy work-life balance by implementing appropriate work schedules for effective utilization of their legal leaves, and managing this process with understanding. Our supportive approach during the maternity leave process facilitates our employees in balancing both their family and work roles, and strengthens their trust and loyalty to LimakPort.

Our Benefits, Social Supports and Practices Enhancing the Quality of Life

We provide not only an economically but also socially strong support system to all our employees. We design our benefits to enhance their quality of life, and implement all benefits equally without discriminating between blue-collar or white-collar employees.

Our main benefits include Supplementary Health Insurance (SHI) and Private Health Insurance (PHI); meals and transportation; company car, phone and computer depending on the position; holiday bonuses; meals and cash assistance in case of the death of a family member (spouse, children, parents, siblings mother-in-law/father-in-law); educational incentive assistance for school children (limited to two children); family assistance; and senior employee incentive bonus.

Our special leave rights include marriage leave; paternity leave; relocation leave; bereavement leave; breastfeeding leave; and educational leave. We continue to support our employees in important periods of their lives.

Respect for Union Rights and Our Liberal Approach

We respect our employees’ rights of unionization and collective bargaining. Thanks to the union program we implement at our port, our employees can join a union if they wish. 73.5% of our employees are covered by collective labor agreements. This high coverage rate is very important in terms of protecting employee rights, ensuring transparent communication and guaranteeing corporate justice.

Creating a work environment that supports freedom of expression and values all opinions is not only a principle for us but also a prerequisite for growing together.

We believe that sustainable success within LimakPort can be achieved not only through systems and processes but also through our employees who embrace, develop and sustain these processes. Therefore, we see all team members as long-term partners. Investing in their development, addressing their needs and recognizing their achievements are integral parts of our corporate culture.



Inclusivity, Diversity and Equal Opportunity

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As LimakPort, we see inclusivity, diversity and equal opportunity as fundamental components of not only our human resources policies but also our corporate values, strategic vision and sustainability approach. For us, differences are a source of richness and inclusivity culture is the key to the achievement of permanent success.

We act with a **zero tolerance policy** against violence, violation of sexual inviolability, all attitudes and behaviors that undermine human dignity.

We work diligently to ensure that no individual characteristics such as gender, age, marital status, ethnic origin, religion, language, disability, pregnancy or potential pregnancy leads to discrimination in the processes of employment, career development, compensation or performance evaluation. Similarly, we maintain a strong position in disciplinary practices against any behavior such as physical or psychological pressure, insults, or mistreatment that could undermine human dignity. We also take ethical principles as the basis **with our zero tolerance policy**.

We adopt an inclusive, respectful and equitable language In our corporate communications, and create an environment where every individual can freely express their competencies. We adhere to the principle of merit in all our processes, and contribute to gender balance through recruitment decisions that support the employment of women among equally qualified male and female candidates.

Regarding the career development of our female employees, we actively encourage stronger representation, especially in middle and senior management positions. We continue to provide post-maternity support during the process of their return to work. We develop systematic approaches to maintain work-life balance within our Company, support the equitable sharing of family responsibilities from a gender equality perspective, and ensure that all employees can reach their full potential.

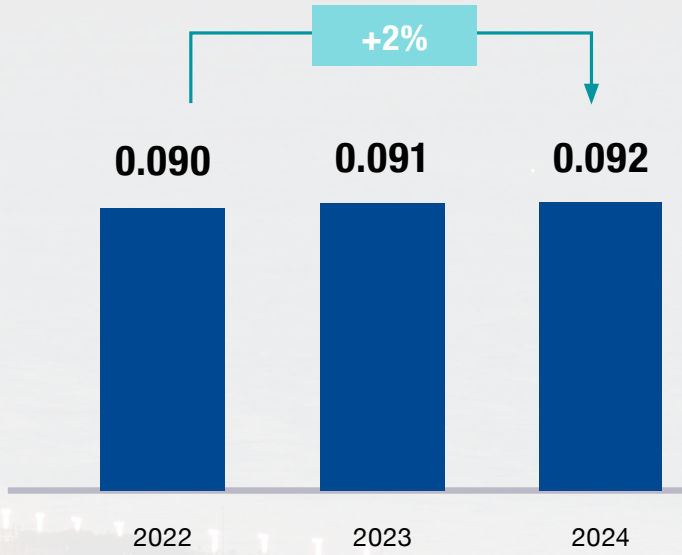
Our Diversity Indicators at Corporate Level

As of 2024, 9.2% of our total workforce consists of women as an indicator of our inclusive workforce. The proportion of women reached 27.2% in white-collar positions and 1.4% in blue-collar positions. We aim to increase the proportion of white-collar female employees steadily every year. We implement equitable policies, as a result of which we achieved an increase of 2% in total proportion of female employees compared to 2022.

Gender Diversity	2022	2023	2024
Proportion of Female Employees	9.0%	9.1%	9.2%
Proportion of Female White-Collar Employees	26.01%	27.06%	27.22%
Proportion of Female Blue-Collar Employees	1.08%	1.05%	1.38%
Proportion of Female Employees in Managerial and Higher Positions	14.29%	13.04%	12.50%

We see our human resources as the most valuable asset of our Company, and build an inclusive work environment that promotes diversity and is based on equal opportunities. Accordingly, we find it particularly important to support women’s participation in the workforce and increase their representation within our Company.

Proportion of Female Employees (%)



We aim to maintain our female employee ratio by 2026, and undertake to increase this proportion by 5% until 2029 and by 10% until 2034. We will continue to provide equal opportunities in recruitment, training and career development processes.

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Inclusivity, Diversity and Equal Opportunity

Equal Opportunity and Inclusion of Employees with Disabilities

We develop inclusive employment policies beyond our legal obligations in order to support the active participation of individuals with disabilities in the workforce. Our employees with disabilities enjoy a fair, supportive and accessible work environment like all employees. We designed both our physical infrastructure and social approaches to eliminate barriers and ensure fair employee experience.

In 2024, we have a total of 14 employees with disabilities in full compliance with legal requirements. The gender distribution of this group consisted of 4 female and 10 male employees. We continuously improve areas such as physical accessibility, role alignment and integration into the work environment to ensure that individuals with disabilities can effectively participate in corporate life.

Our Fair and Equal Compensation System

LimakPort’s compensation policy is based on the principle of equal pay for equal work. We implement a fair and transparent remuneration system in parallel to market conditions, taking grade structures and position-based competencies into consideration. Salary scales are determined with the approval of the Board of Directors. We offer equal conditions for the same positions without any discrimination based on gender or other factors. Therefore, we strengthen both employee motivation and internal fairness perception.



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Talent Management and Development



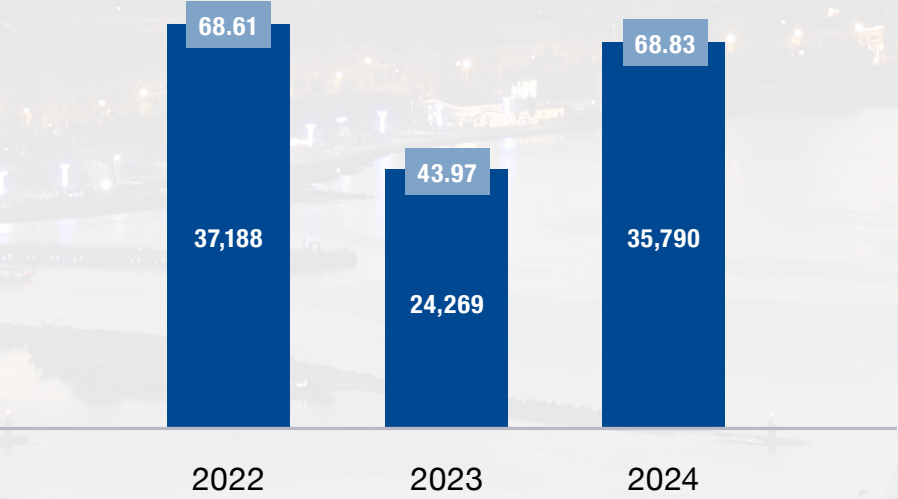
As LimakPort, we place great importance on our employees’ development, not only in terms of their current competencies but also as tomorrow’s potential leaders, problem solvers and inspiring colleagues. We see our human resources as the main drivers of our corporate strategies and as a transformative force. With this approach, we design our *Code of Business Ethics* with a holistic vision encompassing the entire career journey of our employees.

All human resources processes starting with recruitment and covering promotion, rotation, performance evaluation, training and career development are carried out based on the principles of equality, transparency and merit. We structure our business relationships not only based on contracts but also on trust and mutual development. We regard investments in our employees’ development areas as one of our corporate priorities.

In 2024, **we provided 35,790 hours of trainings** to our employees under the systematic development programs we implemented.

A significant portion of these trainings focused on supporting individual competencies and enhancing the efficiency of business processes. As of 2024, the average **hours of training per employee was 68.83 hours (69 hours for female employees and 68.80 hours for male employees).**

Total and Average Training Hours Provided to Employees



■ Total Hours of Training Provided to Employees
■ Average Hours of Training per Employee

Our training and development practices have a strong structure, not only quantitatively but also qualitatively. In 2024, we provided 492 hours of training in total, focusing on environment and sustainability.

These trainings included specialized programs such as **ISO 14064-1 Carbon Footprint, Basic Environmental Training, ISO 10002 Customer Satisfaction Management System Training, OPRC-1 and ISO 50001 Energy Management Systems Training.** We aim to strengthen our organizational capacity and to enhance our employees’ environmental awareness with these trainings.

Our training investments significantly increased in 2024, and training and development expenditures reached TRY 1,945,143.8 in total. The average investment amount per employee rose to TRY 3,741 with almost sixfold increase compared to the previous year.

In addition to the budget allocated for training activities, the average hours of training per employee also improved. The average training duration per employee reached 68.83 hours in 2024, exceeding 68.61 hours recorded in 2022. Therefore, we showed our ability to prioritize our employees’ development again after the major disaster in 2023 and to restore our corporate training capacity to levels beyond previous years.

Talent Management and Development

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Employee Trainings	Unit	2022	2023	2024
Average Hours of Training per Employee	Hour	68.61	43.96	68.82
Female	Hour	69	44	69
Male	Hour	68.574	43.962	68.80
Total Hours of Training Provided to Employees	Person*Hour	37,188	24,269	35,790
Female	Person*Hour	3,381	2,200	3,312
Male	Person*Hour	33,807	22,069	32,478
Total Training and Development Expenditure	₺	585,975	350,658	1,945,143.8
Average Training and Development Expenditure per Employee	₺	1,081	635	3,741

Promotions	Unit	2022	2023	2024
Total Number of Employees Promoted	#	62	47	79
Female	#	1	4	5
Male	#	61	43	74

Career development and promotion processes are among the key elements that strengthen employee loyalty. In 2024, 79 a total of employees (5 female and 74 male employees) received promotions. Each promotion decision is made based on objective criteria such as competencies, performance and alignment with our corporate values.

Our employees’ length of service in the Company is also a strong indicator of their commitment to our corporate culture. As of 2024, 47% of our employees have been working the company for over 5 years (5th year included), showing a high level of employee loyalty as well as the importance, we place on employee satisfaction.



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Occupational Health and Safety



Click or scan the code to watch the **LimakPort Occupational Health and Safety Film**.

As LimakPort, we see occupational health and safety as an integral part of employee wellbeing and sustainable operational success. Providing healthy, safe and decent working conditions is among our top priorities. Accordingly, we develop our OHS practices not only focusing on legal compliance but also adhering to the principles of continuous improvement and risk prevention.

Our OHS policy is comprehensively implemented from on-site practices to control mechanisms, and from training programs to risk assessments, and transparently shared with all stakeholders (employees, contractors and visitors). We are strictly committed to the following principles as per our **OHS policy**, which is publicly disclosed on our website:

- Taking proactive measures to ensure occupational health and safety and minimize environmental impacts,
- Providing comprehensive briefings and awareness training to all our employees, contractors and visitors both before and during the works,
- Reviewing risks annually beyond legislative requirements, updating them in line with on-site observations, and systematizing immediate response procedures.

Our Systematic OHS Practices and Risk Management

Our OHS department provides uninterrupted service in three-shift system. There is an occupational safety specialist assigned to each shift. We carry out all on-site activities under a work permit system, ensuring that every new operation is incorporated into the existing risk analysis or reassessed to take preventive measures against potential hazards. We not only update our risk analyses annually but also dynamically revise them in response to workplace accidents, “near-miss” incidents, and employee feedback.

Our Training and Awareness Activities

We place great importance on training and awareness processes for a widespread occupational health and safety culture at corporate level. We provide regular trainings on topics such as orientation, emergency management, safety when working at height, fire safety and use of personal protective equipment (PPE). In 2024, we provided 6,288 person-hours of OHS training in total, which were not limited to our employees but also covered all contractor personnel and visitors entering the site. Moreover, “Toolbox” on-the-job trainings are regularly provided in three-shift system, while visitors are subject to briefing sessions before they enter the port area.

In 2024, we increased our average hours of OHS training per employee to 12.09 hours as another key indicator of measuring the effectiveness of our trainings.

Training data from 2024 reveal a more strongly widespread OHS awareness among our employees and an ever-evolving preventive safety culture based on the principle of continuous improvement across the organization.

In parallel, we focus on expanding the scope of OHS trainings for contractor companies providing labor services in the port for the upcoming period. Accordingly, our target from a sustainable supply chain management perspective is to increase the average OHS training hours per contractor personnel by 10% compared to the previous year.

We aim to transform this momentum into a holistic safety culture in the upcoming period, in a way that involves not only our employees but also all stakeholders including contractor companies.

Our Investments for Enhancing Operational Safety

We invest in equipment and infrastructure to continuously improve our OHS performance.

- In this context:
- Horizontal lifelines were integrated into SSG and RTG machines to ensure safety when working at height.
 - A twist lock unlocking station is used as a portable safe waiting area designed to protect personnel from risks such as vehicle traffic or falling loads during ship operations.
 - The use of unsafe platforms was eliminated and the risk of falls from height was reduced with forklift man baskets.
 - Eyewash and safety showers were installed on berths to increase preparedness for potential emergencies as part of hazardous material compliance requirements.

Accidents and Performance Indicators

As LimakPort, we handle our occupational health and safety performance not only within the framework of regulatory compliance but also with continuous monitoring, analysis and improvement understanding. A total of 52 workplace accidents occurred during the year, indicating a slight increase compared to 47 accidents recorded in the previous year.

According to the breakdown of these accidents, 11 involved our employees, while 41 involved contractor personnel, once again showing the need for careful monitoring of contractor-related risks. On the other hand, no fatal workplace accidents occurred during the year.

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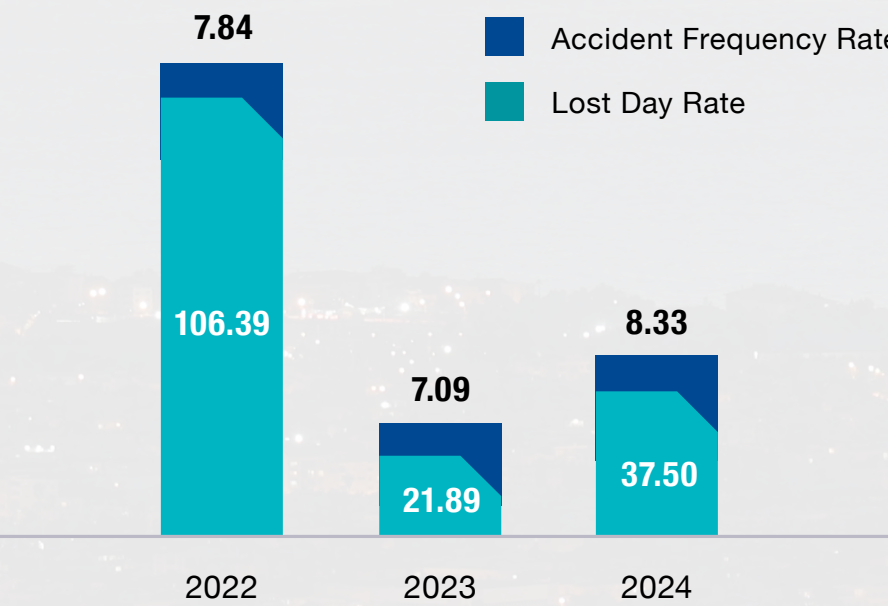
The absence of fatalities among our employees and contractor personnel confirms the effectiveness of our preventive measures in the field.

The number of lost days due to workplace accidents was recorded as 234 in 2024, indicating a remarkable improvement compared to 692 lost days in 2022. We observe that not only the number of accidents but also their severity levels are under control now, thanks to enhanced reporting systems, preventive practices and effective intervention processes. These results show that our occupational health and safety culture has evolved to address not only visible risks but also potential impacts.

Our accident frequency, which is one of the key OHS performance indicators we monitor throughout the year, was calculated as 8.33% in 2024. Although it represents a slight increase compared to 7.84% recorded in 2022, the improvements achieved in supplementary indicators such as accident severity and lost day rate show that we manage on-site risks more effectively.

Furthermore, when evaluating the lost day rate due to accidents, we see that our performance in 2024 shows a clear trend of improvement. This improvement reflects the tangible impacts of our proactive approaches such as reducing the severity of injuries, enhancing our rapid response capacity and strengthening our preparedness level for emergencies.

Accident Frequency and Lost Day Rates (%)



Accident frequency and lost day rate are not only quantitative performance indicators but also qualitative indicators that reflect the maturity level of our corporate safety culture, effectiveness of our risk management system and sustainability of safety awareness in the field. With this awareness, we aim to reduce accident frequency and severity rate by 10% in each target period compared to the previous one in order to enhance our occupational health and safety performance.

Audits and Performance Monitoring

Our OHS practices are regularly audited by third parties. Annual insurance audits, TSE Integrated Management Systems audits and semi-annual TYUB inspections as well as unannounced interim controls are carried out to evaluate the effectiveness of our processes.

Our OHS Metrics	2022	2023	2024
Number of lost days due to accidents	692	145	234
Number of accidents	51	47	52
Our Employees at LimakPort	5	3	11
Our Contractors	46	44	41
Accident Frequency Rate	7.84%	7.09%	8.33%
Lost Day Rate	106.39%	21.89%	37.50%

We successfully achieved our target of “0 minor or major non-conformities” in the audits conducted in 2024. These audits are conducted through document review, on-site observations, equipment usage and assessment of OHS impacts on operations.

We directly implement equipment revisions and process improvements based on suggestions from the field within the scope of our target of reducing the frequency and severity rates of workplace accidents by 10% compared to the previous year as part of our OHS performance targets. In 2024, our workplace accident frequency rate was 8.33%.

Health Services and Emergency Response

We have a 24/7 infirmary in the port area. Our workplace doctor and medical officer directly contribute to the coordination of OHS processes. Moreover, a patient transport vehicle provided by an external service provider rapidly responses to urgent health needs with the support of emergency medical technicians (EMTs) and drivers on duty. All employees and contractors without discrimination receive first aid, wound care and medical assessments in the infirmary, and are referred to hospitals when necessary.

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We view customer satisfaction not only as a result of our service, but also as one of the fundamental elements that determine our operational efficiency and sustainability. We implement our policies on quality, environment, occupational health and safety, energy efficiency, and customer satisfaction with a holistic approach within the framework of our Integrated Management System.

The foundation of our relationship with our customers is based on providing fast, reliable, and accessible service. We listen carefully to your requests, prioritize your needs, and implement solutions that meet your expectations as quickly as possible. We are creating new service areas based on our customers’ suggestions.

In response to the high demand from our customers in the provinces of İskenderun, Gaziantep, and Kahramanmaraş in our region, we have completed our plans to launch our warehouse service. Developed with a customer-focused approach, this project aims to enhance our service quality and contribution to regional trade, while minimizing logistics costs for our customers in the hinterland, thereby providing them with a significant competitive advantage.

In this regard, we have initiated the necessary permit processes to convert six of the warehouses currently in use within our port area into warehouses with a total area of 9,053.1 m², comprising 5,603.1 m² of covered space and 3,450 m² of open space.

We are making this additional service capacity we provide for our customers faster and easier to access by supporting it with digital solutions. For example, we manage all container tracking and service requests through a digital platform, and we automate port operations using a QR code entry system. Additionally, we plan to implement the **“Truck Appointment”** project, which will enable scheduled port entry for vehicles in the coming period, and live support applications.

To enhance customer experience, we prioritize accessibility in service request and information processes. We respond to requests received via email within a maximum of half an hour and remain directly accessible by phone. We can meet customer requests at any time of the day thanks to our personnel on duty. We receive direct feedback through our regular **“Listen to the Customer”** meetings and convert the data obtained into action plans. Additionally, with the authority granted to our customer representatives, we can initiate rapid resolution and compensation processes in certain situations.

Our customer trust rate, measured at over **80%** in 2024, reflects the high level of trust our business partners have in us.

Our operations unit works directly under General Management. We have teams specializing in services such as ship operations, container stuffing and unstuffing (CFS), door-to-door operations, export procedures, reconciliation and invoicing. Each team focuses on its own processes to provide our customers with faster and more effective solutions.

We provide our customers with speed and convenience by moving our service processes to a digital environment. Many processes that were previously carried out on paper are now conducted entirely through online systems. Our customers can create service requests, select containers, make payments, and schedule appointments all through a single digital platform.

We place great importance on our customers’ opinions and feedback. Customer satisfaction is one of the most important indicators we use to measure our service quality. In 2024, we significantly reduced the number of customer complaints compared to 2022, bringing it down to 33, and achieved a resolution rate of 96.97%.

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We track complaints in categories such as field operations, CFS warehouses, customer service, gate-weighing operations, and marketing.

We aim to sustain our customer satisfaction score, which is currently over 80%, above this level. To maintain this rate, we continuously improve customer experience through regular surveys, complaint management processes, and operational improvements.

By establishing a structure that is open to feedback, we view each of our customers as a partner in our sustainable development. We not only listen to requests but also adopt a solution-focused service culture by taking action. We manage customer satisfaction in line with our ethical, environmental, and operational standards, working to provide better service at every step.

Our Customer Experience and Satisfaction Metrics	2022	2023	2024
Total Number of Our Customers	2,496	4,167	3,752
Number of Our Local Customers	2,464	4,123	3,700
Number of Our Foreign Customers	32	44	52
Number of Complaints from Our Customers	80	61	33

96.97%

Customer Complaint Resolution Rate

81%

Customer Trust Rate

0

Number of complaints received regarding breaches of customer confidentiality

0

Number of leaks, thefts or losses detected in customer data



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We consider our supply chain not only as a flow of goods and services but as a holistic area of sustainability together with its environmental and social impacts. We adopt an ethical, transparent and responsible approach in our relationships with suppliers, and manage our collaborations based on the criteria of environmental sensitivity, social compliance and operational safety.

All suppliers are subject to a preliminary assessment before starting a cooperation with us. In this process, we request various documents (especially ISO certifications verifying their environmental compliance) and expect them to comply with relevant occupational health and safety (OHS) procedures.

We monitor and assess our suppliers not only at the beginning but throughout all stages of their business processes. We conduct supplier scoring based on feedback from our OHS and environmental units in the post-sale period, and develop performance-based recommendations for improvement.

As of 2024, we assessed 1,835 suppliers in total for their environmental and social impacts within the scope of both preliminary assessment (ISO certifications, workforce structure and activity history) and post-sale field assessment (compliance with legal requirements,

occupational health and safety practices, management of environmental impacts, waste management and potential sanctions), resulting in a coverage rate of 100% in this area. We took steps towards improving relationships with certain suppliers that were previously identified as having high negative impacts, as well as having to terminate our business relationship with one supplier. This decision demonstrates our commitment to the principle of sustainability in our supply chain.

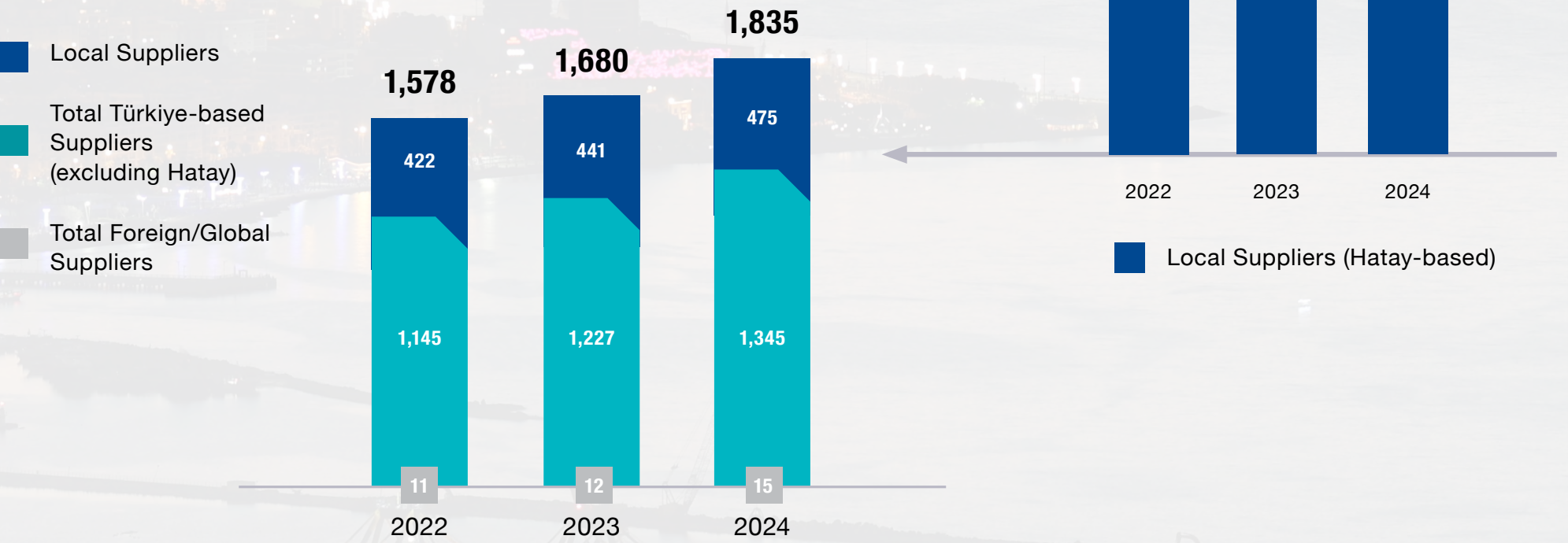
We prioritize domestic and local suppliers to contribute to regional development. Our business partnerships with suppliers across Türkiye, especially those located near our area of activity, are considered as key components of our sustainable supply chain.

As of 2024, the number of Hatay-based suppliers reached 475 with an increase of around 13% compared to 2022, and the total number of local (Türkiye-based) suppliers including national companies based outside Hatay amounted to 1,820. This structure shows that nearly all of our supplier portfolio consists of domestic companies.

In 2024, the share of payments to local suppliers within total supply expenditure is around 50%. Total payments to local (Hatay-based) suppliers in the last three years reached TRY 680 million.

These strong partnerships with our domestic and local suppliers not only support our operational continuity and economic inclusion but also contribute to our target of reducing our environmental footprint. They also strengthen our social responsibility approach within the supply chain.

Total Number of Suppliers by Supplier Category



Suppliers	2022	2023	2024
Total number of suppliers	1,578	1,680	1,835
Number of Local Suppliers	422	441	475
Total Number of Türkiye-based Suppliers (excluding Hatay)	1,145	1,227	1,345
Total Number of Foreign/Global Suppliers	11	12	15
Total Number of New Suppliers	92	105	148
Number of Suppliers Assessed for Environmental and Social Impacts*	100%	100%	100%

* We assess our suppliers for compliance with environmental and social criteria at every stage of our cooperation. In the first stage, we conduct a preliminary assessment process covering elements such as ISO certifications, environmental and social certificates, workforce structure and activity history. As our business cooperation continues, we monitor our suppliers' on-site activities through post-sales field assessments in areas such as compliance with legal requirements, occupational health and safety practices, management of environmental impacts, waste management and potential sanctions.

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We take the potential impacts of climate change into consideration when shaping our supply chain strategies. Since extreme weather events such as storms and heavy rainfall can directly affect our port operations, we especially prioritize preparedness for these risks.

Operations are suspended safely, ships more securely, and our employees are protected thanks to our procedures designed for storms. Within this scope, we utilize technical solutions such as the Short-Tension System, which provides equal load distribution on ship mooring ropes.

To ensure our suppliers comply with occupational health and safety (OHS) standards, we conduct audits based on our internal procedures as well as the safety requirements of our business partners. Regular controls are carried out to ensure that our suppliers are not listed on national or international sanction lists. In case of non-compliance, we do not initiate the collaboration or terminate existing business relations.

We see our suppliers as our business partners. It is important for us to manage the environmental, social and governance impacts of our supply chain by focusing on sustainability focus. For 2026, we prioritize the environmental and social assessment of subcontractors providing services at the port and top 50 suppliers that we make the most procurements.

In this context, we aim to audit 50% of the suppliers we actively work with by 2029, and all suppliers by 2034 in terms of their environmental and social impacts.

We prioritize local suppliers for regional development

We aim to increase our local supplier rate by 2% until 2026, 5% until 2029, and 10% until 2034 in order to contribute to the local economy and strengthen the regional supply chain.

For the purpose of enhancing occupational health and safety awareness in our supply chain, we aim to increase OHS informational trainings provided to all subcontractors that are engaged in labor services within the port by at least 10% each year compared to the previous period, thus improving both our operational safety and our suppliers’ the sustainability at the same time.

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With the awareness that our responsibility to society is not limited to creating economic value, we adopt the fundamental principles of enhancing social welfare in regions where we operate and acting in harmony with the environment and society. We continue to contribute to society through education, environment, culture and arts, volunteering and public-private partnerships.

- Implementation of Hatay Marine Litter Provincial Action Plan (HDÇEP)
- Our Contribution to Türkiye’s Engineer Girls Mentorship Program
- Social Contribution Projects by way of Employee Volunteering
- Odor Management and Environmental Response Practices
- Port Noise Management and Technical Assessment Process
- Environmental Monitoring and Notifications to Authorized Institutions
- Follow-up of Community Complaints and Corporate Transparency

We conduct our relations with settlements closest to our port based on trust and responsibility. We work to minimize the social and environmental impacts of our activities with an understanding of continuous improvement.

In the upcoming period, we aim to implement more comprehensive projects including practices such as social impact assessments, community surveys and local development programs.



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Social Performance Indicators

Number of Employees	Unit	2022	2023	2024
Total Number of Employees	#	542	552	520
Female	#	49	50	48
Male	#	493	502	472
Number of White-Collar Employees	#	173	170	158
Female	#	45	46	43
Male	#	128	124	115
Number of Blue-Collar Employees	#	369	382	362
Female	#	4	4	5
Male	#	365	378	357
Number of Full-Time Employees	#	542	552	520
Female	#	49	50	48
Male	#	493	502	472
Number of Employees Under Collective Bargaining Agreement	#	351	354	382
Female	#	4	4	4
Male	#	347	350	378
Number of Disabled Employees	#	16	15	14
Female	#	4	4	4
Male	#	12	11	10

Numbers of Employees by Years	Unit	2022	2023	2024
Number of People Working in the Company for 0-5 Years	#	287	290	243
Female	#	36	33	30
Male	#	251	257	213
Number of People Working in the Company for 5-10 Years (Inclusive)	#	227	189	189
Female	#	12	13	11
Male	#	215	176	178
Number of Employees in the Company for Over 10 Years	#	28	73	88
Female	#	1	4	7
Male	#	27	69	81

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Number of Employees by Age Breakdown	Unit	2022	2023	2024
Under 30 Years Old	#	161	154	121
Female	#	29	26	22
Male	#	132	128	99
30-50 Years Old (Inclusive)	#	353	368	368
Female	#	20	24	26
Male	#	333	344	342
Over 50 Years Old	#	28	30	31
Female	#	0	0	0
Male	#	28	30	31
Manager And Above (Total Number of Executives) - Under 30 Years Old	#	0	0	0
Female	#	0	0	0
Male	#	0	0	0
Manager and Above (Total Number of Executives) - 30-50 Years Old (Inclusive)	#	20	22	20
Female	#	3	3	3
Male	#	17	19	17
Manager and Above (Total Number of Executives) - Over 50 Years Old	#	1	1	4
Female	#	0	0	0
Male	#	1	1	4

New Hires	Unit	2022	2023	2024
Total Number of New Hires	#	124	75	23
Female	#	16	8	4
Male	#	108	67	19
Under 30 Years Old	#	69	43	17
Female	#	13	5	4
Male	#	56	38	13
30-50 Years Old (Inclusive)	#	50	31	4
Female	#	3	3	0
Male	#	47	28	4
Over 50 Years Old*	#	5	1	2
Female	#	0	0	0
Male	#	5	1	2
Number of Interns Recruited in One Year	#	0	1	0
Female	#	0	1	0
Male	#	0	0	0

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Employee Turnover Rate		Unit	2022	2023	2024
Total Number of Employees Who Left Work		#	44	65	55
	Female	#	9	7	6
	Male	#	35	58	49
Number of Employees Who Left Work - Under 30 Years Old		#	20	23	9
	Female	#	6	4	2
	Male	#	14	19	7
Number of Employees Who Left Work - 30-50 Years Old (Inclusive)		#	20	39	39
	Female	#	3	3	3
	Male	#	17	36	36
Number of Employees Who Left Work - Over 50 Years Old		#	4	3	7
	Female	#	0	0	1
	Male	#	4	3	6
Number of Employees Who Left Work Voluntarily		#	41	38	28
	Female	#	7	3	4
	Male	#	34	35	24
Employee Turnover Rate		%	0.081	0.118	0.106
Voluntary Employee Turnover Rate		%	0.076	0.069	0.054
Female Employee Turnover Rate		%	0.017	0.013	0.012

Gender Diversity		Unit	2022	2023	2024
Proportion of Female Employees in Total Labor Force		%	0.090	0.091	0.092
Proportion of Female White-Collar Employees		%	0.260	0.271	0.272
Proportion of Female White-Collar Employees in Total Labor Force		%	8.30	8.33	8.27
Proportion of Female Blue-Collar Employees		%	1.08	1.05	1.38
Proportion of Female Blue-Collar Employees in Total Labor Force		%	0.74	0.72	0.96
Proportion of Female in Managerial and Higher Positions		%	14.29	13.04	12.50

Employee Wellbeing		Unit	2022	2023	2024
Number of Employees on Parental Leave		#	1	2	3
	Female	#	1	2	3
	Male	#	0	0	0
Number of Employees Returning to Work After Parental Leave		#	1	2	3
	Female	#	1	2	3
	Male	#	0	0	0

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Employee Trainings	Unit	2022	2023	2024
Average Hours of Training per Employee	Hour	68.61	43.97	68.83
Female	Hour	69	44	69
Male	Hour	68.57	43.96	68.81
Total Hours of Training Provided to Employees	Person*Hour	37,188	24,269	35,790
Female	Person*Hour	3,381	2,200	3,312
Male	Person*Hour	33,807	22,069	32,478
Total Training and Development Expenditure	₺	₺585,975.23	₺350,657.88	₺1,945,143.80
Average Training and Development Expenditure per Employee	₺	₺1,081	₺635	₺3,741
Total Hours of Training on Environment/Sustainability	Person*Hour	219	0	492
Average Hours of Training per Employee on Environment/Sustainability	Hour	0.404	-	0.946
Average Hours of Training per Employee on Diversity and Inclusion	Hour	0	0	0
Total Hours of Training in Environmental Management	Person*Hour	106	0	17
Average Hours of Training per Employee on Environmental Management	Hour	0.196	-	0.033

OHS Metrics	Unit	2022	2023	2024
Number of Lost Days Due to Accidents	days	692	145	234
Number of Accidents	#	51	47	52
LimakPort Employees	#	5	3	11
Contractors	#	46	44	41
Number of Fatal Accidents	#	0	0	0
LimakPort Employees	#	0	0	0
Contractors	#	0	0	0
Accident Frequency Rate	%	7.84	7.09	8.33
Proportion of Fatal Accidents	%	0	0	0
Lost Day Rate	%	106.39	21.89	37.5

OHS Basic Training Metrics*	Unit	2022	2023	2024
Number of Employees Receiving Training	#	544	0	522
Hours of Training Provided	#	12	12	12
Total Hours of Training Provided	Person*Hour	6,528	0	6,264

* The number of employees trained in 2024 appears higher than our number of employees in the same period, because former employees are also included in the training data.

OHS Orientation Training Metrics	Unit	2022	2023	2024
Number of Employees Receiving Training	#	124	75	23
Hours of Training Provided	#	1	1	1
Total Hours of Training Provided	Person*Hour	124	75	23

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Suppliers	Unit	2022	2023	2024
Total Number of Suppliers	#	1,578	1,680	1,835
Total Number of Local Suppliers	#	422	441	475
Total Number of Türkiye-Based Suppliers (Excluding Hatay)	#	1,145	1,227	1,345
Total Number of Foreign/Global Suppliers	#	11	12	15
Total Number of New Suppliers	#	92	105	148
Percentage of Local Suppliers	%	27	26	26
Total Payments to Local Suppliers	TL	₺104,787,552.35	₺249,895,218.38	₺326,018,631.41
Total Payments to Suppliers	TL	₺278,280,436.36	₺483,487,823.38	₺655,869,238.28
Proportion of Payments to Local Suppliers	%	0.377	0.517	0.497
Number of suppliers assessed for environmental and social impacts	#	1,578	1,680	1,835
Percentage of suppliers assessed for environmental and social impacts*	%	100	100	100
Number of suppliers identified as having significant actual and potential negative environmental and social impacts	#	10	4	1
Percentage of suppliers identified as having significant actual and potential negative environmental and social impacts with which improvements were agreed upon as a result of assessment	%	10	4	1
Percentage of suppliers identified as having significant actual and potential negative environmental and social impacts with which relationships were terminated as a result of assessment	%	0	0	1

* We assess our suppliers for compliance with environmental and social criteria at every stage of our cooperation. * In the first stage, we conduct a preliminary assessment process covering elements such as ISO certifications, environmental and social certificates, workforce structure and activity history. As our business cooperation continues, we monitor our suppliers’ on-site activities through post-sales field assessments in areas such as compliance with legal requirements, occupational health and safety practices, management of environmental impacts, waste management and potential sanctions.

Environmental Performance Indicators

Metrics	Unit	2022	2023	2024
Handled Load	tonne	7,927,074	4,272,088	5,671,687

Environmental Investments	Unit	2022	2023	2024
Total Investments and Expenditure	USD	71,839.41	86,230.99	96,595.33

Penalties and Sanctions Under Environmental Legislation	Unit	2022	2023	2024
Number of Environmental Penalties and Sanctions	#	0	0	0
Amount of Environmental Penalties and Sanctions	TRY	0	0	0

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Energy Management

Non-Renewable Energy Consumption	Unit	2022	2023	2024
Electricity	kWh	13,559,679	11,972,519	10,763,252
Electricity Per Handled Load	kWh/tonne	1.71	2.80	1.90
Diesel (Forklift + Tractor + Generator + Terminal Equipment)	kWh	23,190,450	36,047,700	17,223,975
Diesel (Forklift + Tractor + Generator + Terminal Equipment) Per Handled Load	kWh/tonne	2.93	8.44	3.04
LPG/LNG/CNG	kWh	152,716	140,410	194,502
LPG/LNG/CNG Per Handled Load	kWh/tonne	0.02	0.03	0.03
Total Non-Renewable Energy Consumption	kWh	36,902,845	48,160,629	28,181,728
Non-Renewable Energy Consumption per Handled Load	kWh/tonne	4.66	11.27	4.97

Energy Consumption (MWh)	Unit	2022	2023	2024
Direct Energy Consumption	MWh	23,343	36,188	17,418
Indirect Energy Consumption	MWh	13,560	11,973	10,763
Total Energy Consumption	MWh	36,903	48,161	28,182

Emissions

Emissions	Unit	2022	2023	2024
Scope 1 Emissions	tonne CO ₂ e	6,338.1	9,815.8	4,974.5
Scope 2 Emissions*	tonne CO ₂ e	4,814.28	0	0
Scope 3 Emissions	tonne CO ₂ e	312.6	2,622	495.5
Total Emissions	tonne CO ₂ e	11,464.94	12,437.85	5,470.02
Greenhouse Gas Emission Intensity	tonne CO ₂ e / tonne	0.0014	0.0029	0.0010

* YEK-G certificate was obtained in 2023, I-REC certificate was obtained in 2024.

Greenhouse Gas Emission Reduction	Unit	2022	2023	2024
Greenhouse Gas Emission Reduction	tonne CO ₂ e	-	-972.92	-6,967.83
Greenhouse Gas Emission Reduction per Handled Load	tonne CO ₂ e/ tonne	-	0.0015	-0.0019

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Water Management

Water Consumption	Unit	2022	2023	2024
Mains Water Consumption	m³	127,330	156,803	181,607
Total Fresh Water Consumption	m³	127,330	156,803	181,607
Water Consumption per Handled Load	m³/ tonne	0.02	0.04	0.03
Waste Water Discharge	Unit	2022	2023	2024
Discharged Wastewater	m³	440	429	427.9

Waste Management

Hazardous/Non-hazardous Waste	Unit	2022	2023	2024
Total Hazardous Waste	tonne	1,455.73	1,710.11	1,546.46
Hazardous Waste per Handled Load	tonne / tonne	0.0002	0.0004	0.0003
Total Non-Hazardous Waste	tonne	470.77	1,067.14	767.72
Non-Hazardous Waste per Handled Load	tonne / tonne	0.00006	0.00025	0.000135
Total Waste	tonne	1,926.5	2,777.247	2,314.181
Total Waste per Handled Load	tonne / tonne	0.00024	0.00065	0.00041

Waste by Disposal Method	Unit	2022	2023	2024
Total Waste Disposed*	tonne	79.1	47.32	25.41
Total Waste Recycled**	tonne	545.214	1,088.35	787.45
Total Waste Sent for Energy Recovery	tonne	1,302.19	1,641.58	1,501.32

* Including all hazardous waste except sludge, bilge and recyclable materials.
** Including engine oil, hydraulic oil and vegetable waste oil.

Quality and Integrated Management Systems



Memberships



İMEAK Chamber of Shipping



YASED - International Investors Association



Port Operators Association of Türkiye (TÜRKLİM)



İstanbul Minerals & Metals Exporters' Associations



İskenderun Journalists Association



Railway Transport Association



General Secretariat of the Service Exporters' Association (HİB)



İskenderun Chamber of Commerce and Industry

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GRI Content Index

GRI Content Index

Statement of Use:	Limak Port has prepared its report covering the period of January 1, 2024 - December 31, 2024 in accordance with the Global Reporting Initiative (GRI) Standards
GRI Used:	GRI 1: Foundation 2021
Applicable GRI Sector Standard(s):	-

GRI STANDARD	INDICATOR	DISCLOSURES
GRI 2: General Disclosures 2021	2-1 Organizational details	About the Report, page 3-5
	2-2 Entities included in the organization's sustainability reporting	About the Report, page 3-5
	2-3 Reporting period, frequency, and contact point	About the Report, page 3-5
	2-4 Restatements of information	-
	2-5 External assurance	LimakPort has not received external assurance for its 2024 Sustainability Report.
	2-6 Activities, value chain, and other business relationships	About the Report, page 3-5
	2-7 Employees	Employee Wellbeing, page 64-65
	2-8 Workers who are not employees	Supply Chain Management, page 74
	2-9 Governance structure and composition	Corporate Governance at LimakPort, page 25-37
	2-10 Nomination and selection of the highest governance body	Corporate Governance at LimakPort, page 25-37
	2-11 Chair of the highest governance body	Corporate Governance at LimakPort, page 25-37
	2-12 Role of the highest governance body in overseeing the management of impacts	Corporate Governance at LimakPort, page 25-37
	2-13 Delegation of responsibility for managing impacts	Corporate Governance at LimakPort, page 25-37
	2-14 Role of the highest governance body in sustainability reporting	Sustainability Management, page 40
	2-15 Conflicts of interest	Corporate Governance at LimakPort, page 25-37
	2-16 Communication of critical concerns	Corporate Governance at LimakPort, page 25-37
	2-17 Collective knowledge of the highest governance body	Corporate Governance at LimakPort, page 25-37
	2-18 Evaluation of the performance of the highest governance body	Corporate Governance at LimakPort, page 25-37
	2-19 Remuneration policies	Not disclosed due to privacy restrictions.
	2-20 Process to determine remuneration	Not disclosed due to privacy restrictions.
	2-21 Annual total compensation ratio	Not disclosed due to privacy restrictions.
	2-22 Statement on sustainable development strategy	Our Journey to Sustainability, page 39
	2-23 Policy commitments	Ethics Management, page 27 Occupational Health and Safety, page 70-71 Inclusivity, Diversity and Equal Opportunity, page 66-67 Employee Wellbeing, page 64-65 Energy Management, page 53-55

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GRI STANDARD	INDICATOR	DISCLOSURES
GRI 2: General Disclosures 2021	2-24 Embedding policy commitments	Occupational Health and Safety, page 70-71 Inclusivity, Diversity and Equal Opportunity, page 66-67
	2-25 Processes to remediate negative impacts	Ethics Management, page 27
	2-26 Mechanisms for seeking advice and raising concerns	Ethics Management, page 27
	2-27 Compliance with laws and regulations	Internal Audit and Internal Control, page 28 Legal Compliance, page 29 Ethics Management, page 27
	2-28 Membership associations	Memberships, page 85
	2-29 Approach to stakeholder engagement	Interaction with Stakeholders, page 44-45
	2-30 Collective bargaining agreements	Employee Wellbeing, page 64-65
MATERIAL TOPICS		
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Our Material Topics, page 41-43
	3-2 List of material topics	Our Material Topics, page 41-43
	3-3 Management of material topics	Our Material Topics, page 41-43
OCCUPATIONAL HEALTH AND SAFETY		
GRI 3: Material Topics 2021	3-3 Management of material topics	Our Material Topics, page 41-43
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Occupational Health and Safety, page 70-71
	403-2 Hazard identification, risk assessment, and incident investigation	Occupational Health and Safety, page 70-71 Social Performance Indicators, page 78-82
	403-4 Worker participation, consultation, and communication on occupational health and safety	Occupational Health and Safety, page 70-71
	403-5 Worker training on occupational health and safety	Occupational Health and Safety, page 70-71 Social Performance Indicators, page 78-82
	403-6 Promotion of worker health	Occupational Health and Safety, page 70-71
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Occupational Health and Safety, page 70-71
	403-9 Work-related injuries	Occupational Health and Safety, page 70-71 Social Performance Indicators, page 78-82
CORPORATE GOVERNANCE		
GRI 3: Material Topics 2021	3-3 Management of material topics	Our Material Topics, page 41-43

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EMPLOYEE WELLBEING		
GRI 3: Material Topics 2021	3-3 Management of material topics	Our Material Topics, page 41-43
GRI 401: Employment 2016	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Employee Wellbeing, page 64-65
	401-3 Parental leave	Employee Wellbeing, page 64-65
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	Employee Wellbeing, page 64-65
GRI 408: Child Labour 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	Employee Wellbeing, page 64-65
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	Employee Wellbeing, page 64-65
TALENT MANAGEMENT AND DEVELOPMENT		
GRI 3: Material Topics 2021	3-3 Management of material topics	Our Material Topics, page 41-43
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Talent Management and Development, page 68-69 Social Performance Indicators, page 78-82
	404-2 Programs for upgrading employee skills and transition assistance programs	Talent Management and Development, page 68-69
	404-3 Percentage of employees receiving regular performance and career development reviews	Talent Management and Development, page 68-69
R&D AND INNOVATION		
GRI 3: Material Topics 2021	3-3 Management of material topics	Our Material Topics, page 41-43
PORT SECURITY		
GRI 3: Material Topics 2021	3-3 Management of material topics	Our Material Topics, page 41-43
INCLUSIVITY, DIVERSITY AND EQUAL OPPORTUNITY		
GRI 3: Material Topics 2021	3-3 Management of material topics	Our Material Topics, page 41-43
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Inclusivity, Diversity and Equal Opportunity, page 66-67
	405-2 Ratio of basic salary and remuneration of women to men	Inclusivity, Diversity and Equal Opportunity, page 66-67
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	Inclusivity, Diversity and Equal Opportunity, page 66-67
GRI 202: Market Presence 2016	202-1 Ratios of standard entry level wage by gender compared to local minimum wage	Inclusivity, Diversity and Equal Opportunity, page 66-67
LEGAL COMPLIANCE		
GRI 3: Material Topics 2021	3-3 Management of material topics	Our Material Topics, page 41-43

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WATER MANAGEMENT		
GRI 3: Material Topics 2021	3-3 Management of material topics	Our Material Topics, page 41-43
GRI 303: Water and Effluents	303-2 Management of water discharge-related impacts	Water Management, page 56 Environmental Performance Indicators, page 82-84
	303-3 Water discharge	Water Management, page 56 Environmental Performance Indicators, page 82-84
	303-4 Water withdrawal	Water Management, page 56 Environmental Performance Indicators, page 82-84
	303-5 Water consumption	Water Management, page 56 Environmental Performance Indicators, page 82-84
ENERGY MANAGEMENT		
GRI 3: Material Topics 2021	3-3 Management of material topics	Our Material Topics, page 41-43
GRI 302: Energy 2016	302-1 Energy consumption within the organization	Energy Management, page 53-55 Environmental Performance Indicators, page 82-84
	302-4 Reduction of energy consumption	Energy Management, page 53-55
	302-5 Reductions in energy requirements of products and services	Energy Management, page 53-55
SOCIAL IMPACT		
GRI 3: Material Topics 2021	3-3 Management of material topics	Our Material Topics, page 41-43
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	Our Social Impact, page 76 Supply Chain Management, page 74-75
	413-2 Operations with significant actual and potential negative impacts on local communities	Our Social Impact, page 76
WASTE MANAGEMENT		
GRI 3: Material Topics 2021	3-3 Management of material topics	Our Material Topics, page 41-43
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	Waste Management, page 57-58
	306-2 Management of significant waste-related impacts	Waste Management, page 57-58
	306-3 Waste generated	Waste Management, page 57-58 Environmental Performance Indicators, page 82-84
	306-4 Waste diverted from disposal	Waste Management, page 57-58 Environmental Performance Indicators, page 82-84
	306-5 Waste directed to disposal	Waste Management, page 57-58 Environmental Performance Indicators, page 82-84

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GRI STANDARD	INDICATOR	DISCLOSURES
ETHICS MANAGEMENT		
GRI 3: Material Topics 2021	3-3 Management of material topics	Our Material Topics, page 41-43
GRI 205: Anti-Corruption 2016	205-1 Operations assessed for risks related to corruption	Ethics Management, page 27 Risk Management, page 30-36
	205-2 Communication and training about anti-corruption policies and procedures	Ethics Management, page 27
CLIMATE CHANGE		
GRI 3: Material Topics 2021	3-3 Management of material topics	Our Material Topics, page 41-43
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Emission Management, page 51 Environmental Performance Indicators, page 82-84
	305-2 Energy indirect (Scope 2) GHG emissions	Emission Management, page 51 Environmental Performance Indicators, page 82-84
	305-3 Other indirect (Scope 3) GHG emissions	Emission Management, page 51 Environmental Performance Indicators, page 82-84
	305-4 GHG emissions intensity	Emission Management, page 51 Environmental Performance Indicators, page 82-84
	305-5 Reduction of GHG emissions	Emission Management, page 51 Environmental Performance Indicators, page 82-84
SUPPLY CHAIN MANAGEMENT		
GRI 3: Material Topics 2021	3-3 Management of material topics	Our Material Topics, page 41-43
GRI 308: Supplier Environmental Assessment 2016	308-2 Negative environmental impacts in the supply chain and actions taken	Supply Chain Management, page 74-75 Social Performance Indicators, page 78-82
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	Supply Chain Management, page 74-75 Social Performance Indicators, page 78-82
PROTECTION OF BIODIVERSITY AND ECOSYSTEMS		
GRI 3: Material Topics 2021	3-3 Management of material topics	Our Material Topics, page 41-43
GRI 304: Biodiversity 2016	304-2 Significant impacts of activities, products and services on biodiversity	Protection of Biodiversity and Ecosystems, page 59

LimakPort

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Sustainability Report 2024

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