



KAMUYU AYDINLATMA PLATFORMU

LİMAK DOĞU ANADOLU ÇİMENTO SANAYİ VE TİCARET A.Ş. Sustainability Compliance Report 2025 - Annual Notification

Summary

Sustainability Compliance Report



**MERKEZİ KAYIT
İSTANBUL**

Türkiye Sermaye Piyasası - Merkezi
Saklanması ve Veri Depolama Kuruluşu

Related Companies

Related Funds

| | Company Compliance Status | | | | Explanation | Report Information on Publicly Disclosed Information (Page number, menu name on the website) |
|--|---------------------------|---------|----|----------------|---|--|
| | Yes | Partial | No | Not Applicable | | |
| Sustainability Compliance Report | | | | | | |
| A. GENERAL PRINCIPLES | | | | | | |
| A1. Strategy, Policy and Goals | | | | | | |
| A1.1. The prioritised environmental, social and corporate governance (ESG) issues, risks and opportunities have been determined by the Company's Board of Directors. | X | | | | The Board of Directors ("BoD") of Limak Doğu Anadolu Çimento ("LDAÇ") and LDAÇ Early Detection of Risk Committee regularly review and update the environmental, social and governance ("ESG") issues, practices, risks, and opportunities. | https://www.limakdoguanadolucimento.com/investor-relations/corporate-governance/policies Limak Çement 2024 Sustainability Report pp. 37-47: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf |
| A1.1. The ESG policies (Environmental Policy, Energy Policy, Human Rights and Employee Policy etc.) have been created and disclosed to the public by the Company's Board of Directors. | X | | | | The ESG policies that form the basis of LDAÇ's management practices are published on the corporate website of LDAÇ. Furthermore, we manage our sustainability processes within the scope of the principles publicly disclosed in the 2024 Sustainability Report ("24 Sustainability Report") prepared by our main shareholder, Limak Çimento Sanayi ve Ticaret A.Ş. ("Limak Çimento"), for the Limak Çimento group. | https://www.limakdoguanadolucimento.com/investor-relations/corporate-governance/policies https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf |
| A1.2. The short and long-term targets set within the scope of ESG policies have been disclosed to the public. | X | | | | The long and short-term targets determined within the scope of LDAÇ's ESG policies have been publicly disclosed in the ESG policies approved by the BoD and available on the LDAÇ corporate website, and additionally, the 24 Sustainability Report of our majority shareholder Limak Çimento, whose sustainability practices we benefit from, has been made publicly available. | https://www.limakdoguanadolucimento.com/investor-relations/corporate-governance/policies Limak Cement 2024 Sustainability Report pp. 65-70: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf |
| A2. Implementation/Monitoring | | | | | | |
| | | | | | The LDAÇ's BoD holds the highest position within the sustainability organization. The Early Detection of Risk Committee, reporting to the BoD, is responsible for closely monitoring | |

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| <p>A2.1. The responsible committees and/or business units for the implementation of ESG policies and the senior officials related to ESG issues in the Company and their duties have been identified and disclosed to the public.</p> | <p>X</p> | | <p>risks related to LDAÇ — particularly sustainability-related risks — and identifying matters that should be addressed by the BoD . Sustainability practices, risks, opportunities, and investment plans from both internal and external sources are communicated to the Early Detection of Risk Committee by the Sustainability Committee of our majority shareholder, Limak Çimento. LDAÇ 's long-term and interim sustainability targets are regularly monitored by the BoD , and risks and opportunities arising from climate change are carefully assessed .</p> | <p>https://www.limakdoguanadolucimento.com/files/28c_Riskin%20Erken%20Saptanması%20Komitesi%20Çalışma%20Esasları-en.pdf Limak Cement 2024 Sustainability Report pp. 56-58: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf</p> |
| <p>A2.1. The activities carried out within the scope of policies by the responsible committee and/or unit have been reported to the Board of Directors at least once a year.</p> | <p>X</p> | | <p>In accordance with the Working Principles of LDAÇ's Audit Committee, Corporate Governance Committee, and Early Detection of Risk Committee, committee meetings are reported to the BoD. Additionally, the Early Detection of Risk Committee, which operates under the BoD, closely monitors risks facing LDAÇ, particularly those related to sustainability, and reports them to the BoD.</p> | <p>https://www.limakdoguanadolucimento.com/investor-relations/corporate-governance/committees Limak Çimento 2024 Sustainability Report p. 57: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf</p> |
| <p>A2.2. In line with the ESG targets, the implementation and action plans have been formed and disclosed to the public.</p> | <p>X</p> | | <p>Our objectives to enhance our performance through independent assurance, strong corporate governance, ESG principles, and the SBTi initiatives — thereby fulfilling our environmental responsibilities in accordance with international standards and strengthening our position in the sector — have been publicly disclosed in detail in our majority shareholder Limak Çimento's '24 Sustainability Report and the CDP Report.</p> | <p>Limak Çimento 2024 Sustainability report pp. 65-70: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf</p> |
| <p>A2.3. The Key ESG Performance Indicators (KPI) and the level of reaching these indicators have been disclosed to the public on yearly basis.</p> | <p>X</p> | | <p>LDAÇ has set sustainability targets for 2030 and 2050, and progress toward achieving these targets is monitored on an annual basis. Action plans have been established for each target and announced to the public in the '24 Sustainability Report of our majority</p> | <p>Limak Çimento 2024 Sustainability Report pp. 65-70: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf</p> |

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| | | | shareholder, Limak Çimento. | |
| A2.4. The activities for improving the sustainability performance of the business processes or products and services have been disclosed to the public. | X | | Sustainability performance, targets, and forward-looking projections are disclosed in the '24 Sustainability Report, while LDAÇ's research and development ("R &D") innovation investments, activities, and achievements are publicly communicated through the '24 Sustainability Report and LDAÇ's official platforms. Furthermore, LDAÇ voluntarily participates in the CDP Climate Change and Water Security programs on a regular annual basis. | https://www.limakdoguanadolucimento.com/files/ldac-3c-2025-yatirimci-sunumu.pdf Limak Cement 2024 Sustainability Report p. 103: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf |
| A3. Reporting | | | | |
| A3.1. The information about the sustainability performance, targets and actions have been given in annual reports of the Company an understandable, accurate and sufficient manner. | X | | LDAÇ's sustainability strategy, focus areas, prioritized topics, and sustainability targets along with their monitoring mechanisms and implementation practices have been publicly disclosed in the '24 Sustainability Report. Furthermore, LDAÇ's Sustainability Compliance Report has been included in the BoD Activity Report for 2025. | Limak Çimento 2024 Sustainability Report pp. 65-70: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf https://www.limakdoguanadolucimento.com/investor-relations/financial-reports/annual-reports |
| A3.2. The information about activities which are related to the United Nations (UN) 2030 Sustainable Development Goals have been disclosed to the public. | X | | Yes. As stated in the '24 Sustainability Report, LDAÇ continues its activities aimed at building a sustainable future in social, environmental, and economic areas by acting in accordance with the "Women's Empowerment Principles" and the "United Nations Global Compact," to which its parent company, Limak Holding A.Ş., is a signatory, as well as the Sustainable Development Goals, GRI Standards, and WEF-IBC Stakeholder Capitalism Metrics. | Limak Çimento 2024 Sustainability Report pp. 3, 65-70: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf |
| A3.3. The lawsuits filed and/or concluded against the Company about ESG issues which are material in terms of ESG policies and/or will significantly affect the Company's activities, have been disclosed to the public. | X | | In Article 7 of LDAÇ Board of Directors' Activity Report for the period 01.01.2025 - 31.12.2025, it has been publicly disclosed that there are no lawsuits filed and/or concluded against the Company that are significant in terms of ESG policies and/or that could materially affect the Company's activities. | https://www.limakdoguanadolucimento.com/investor-relations/financial-reports/annual-reports |
| A4. Verification | | | | |
| | | | Yes. '24 Sustainability Report has received a | |

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| A4.1. The Company's Key ESG Performance metrics have been verified by an independent third party and publicly disclosed. | X | | | | limited assurance statement from QSI. | Limak Çimento 2024 Sustainability Report p. 192: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf |
| B. ENVIRONMENTAL PRINCIPLES | | | | | | |
| B1. The policies and practices, action plans, environmental management systems (known by the ISO 14001 standard) and programs have been disclosed. | X | | | | Yes. LDAÇ plants are pioneers in integrated management system certification processes on a sectoral basis. The first cement plant in Türkiye to hold the Integrated Management Systems GOLD certificate, as well as the industry's first ISO 45001 Occupational Health and Safety Management System certification, are within LDAÇ. Furthermore, in the last quarter of 2017, under the motto 'Managing not by objectives, but through objectives', all documentation related to ISO 9001, ISO 14001, ISO 45001, ISO 50001, and EN 197-1 standards were consolidated and brought together under a single portal accessible to all relevant personnel. | https://www.limakdoguanadolucimento.com/corporate/integrated-management-systems Limak Cement 2024 Sustainability Report pp. 11, 72-85,104: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf |
| B2. The environmental reports prepared to provide information on environmental management have been disclosed to the public which is including the scope, reporting period, reporting date and limitations about the reporting conditions. | X | | | | Yes, this has been disclosed in the '24 Sustainability Report of our main shareholder, Limak Çimento. With regard to the environmental reports prepared for providing information on environmental management, the scope of the report, the reporting period, the date, and the limitations concerning reporting conditions have been publicly disclosed in the '24 Sustainability Report. | Limak Cement 2024 Sustainability Report p. 3 https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf |
| B4. The environmental targets within the scope of performance incentive systems which included in the rewarding criteria have been disclosed to the public on the basis of stakeholders (such as members of the Board of Directors, managers and employees). | | | x | | | |
| B5. How the prioritised environmental issues have been integrated into business objectives and strategies has been disclosed. | X | | | | Yes, similarly, as publicly disclosed in the '24 Sustainability Report of our main shareholder, Limak Çimento, targets have been established within the scope of strategic sustainability focus areas determined in line with the prioritization analysis. The integration of environmental issues into business objectives and strategies, particularly climate-related matters, is communicated to the public through CDP reports. | Limak Çimento 2024 Sustainability Report pp. 60-70: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf |

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| <p>B7. The way of how environmental issues has been managed and integrated into business objectives and strategies throughout the Company's value chain, including the operational process, suppliers and customers has been disclosed.</p> | X | | <p>Yes, the collaborations that LDAÇ undertakes with stakeholders in its value chain on environmental matters and how it integrates these into its strategy have been publicly disclosed in the '24 Sustainability Report of our main shareholder, Limak Çimento.</p> | <p>Limak Çimento 2024 Sustainability Report pp. 34-37: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf</p> |
| <p>B8. Whether the Company have been involved to environmental related organizations and non-governmental organizations' policy making processes and collaborations with these organizations has been disclosed.</p> | X | | <p>LDAÇ actively participates in policy-making processes through its memberships in various institutions and organizations in the sector as well as in non-governmental organizations. These activities and related memberships are similarly disclosed to the public in detail within the scope of the '24 Sustainability Report and CDP reports of our main shareholder, Limak Çimento.</p> | <p>Limak Çimento 2024 Sustainability Report pp. 15, 19, 23, 85: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf</p> |
| <p>B9. In the light of environmental indicators (Greenhouse gas emissions (Scope-1 (Direct), Scope-2 (Energy indirect), Scope-3 (Other indirect), air quality, energy management, water and wastewater management, waste management, biodiversity impacts)), information on environmental impacts is periodically disclosed to the public in a comparable manner.</p> | X | | <p>All emissions are calculated in accordance with internationally recognized methodologies and disclosed to the public. Similarly, air quality, energy, water, waste, and biodiversity impacts are measured and monitored within the framework of internationally accepted standards, and all data obtained for the Limak Çimento group is shared through the '24 Sustainability Report and CDP reports of our main shareholder, Limak Çimento.</p> | <p>Limak Çimento '24 Sustainability Report pp. 149-155 https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf</p> |
| <p>B10. Details of the standard, protocol, methodology, and baseline year used to collect and calculate data has been disclosed.</p> | X | | <p>The methodologies related to LDAÇ's key performance measurements are registered as ISO 14064, ISO 14046, and MRV approved, and have independent third-party verification.</p> | <p>https://www.limakdoguanadolucimento.com/corporate/integrated-management-systems https://limakcimento.com/en/sustainability/reports/cdp</p> |
| <p>B11. The increase or decrease in Company's environmental indicators as of the reporting year has been comparatively disclosed with previous years.</p> | X | | <p>The values of environmental indicators have been publicly disclosed in the '24 Sustainability Report prepared by our main shareholder, Limak Çimento, for the Limak Çimento group, with comparisons to previous years.</p> | <p>Limak Çimento 2024 Sustainability Report pp. 149-155: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf</p> |
| | | | <p>The short-term and long-term targets set to reduce environmental impacts, along with the progress made against the targets</p> | |

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| <p>B12. The short and long-term targets for reducing the environmental impacts have been determined and the progress compared to previous years' targets has been disclosed.</p> | <p>X</p> | | <p>established in current and previous years, have been publicly disclosed in the '24 Sustainability Report prepared by our main shareholder, Limak Çimento, for the Limak Çimento group .</p> | <p>Limak Çimento 2024 Sustainability Report pp. 65-70: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf</p> |
| <p>B13. A strategy to combat the climate crisis has been created and the planned actions have been publicly disclosed.</p> | <p>X</p> | | <p>Yes. As one of the pioneering companies in the sector, we take on the necessary responsibilities in the fight against climate crisis, both in bringing new technologies to our country and in the preparation of legal frameworks, and we implement our decarbonization roadmap by taking into consideration both our company LDAÇ and all of our stakeholders. Please refer to the '24 Sustainability Report prepared by our parent Limak Çimento.</p> | <p>Limak Çimento 2024 Sustainability Report pp. 73-79 https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf</p> |
| <p>B14. The programs/procedures to prevent or minimize the potential negative impact of products and/or services on the environment have been established and disclosed.</p> | <p>X</p> | | <p>LDAÇ facilities have the ISO 14001 Integrated Management System in place, and within the scope of the Environmental Policy, practices and related policies have been established and publicly disclosed to prevent the potential negative environmental impact of products and services.</p> | <p>https://www.limakdoguanadolucimento.com/corporate/integrated-management-systems Limak Cement 2024 Sustainability Report pp. 99-102 https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf</p> |
| <p>B14. The actions to reduce greenhouse gas emissions of third parties (suppliers, subcontractors, dealers, etc.) have been carried out and disclosed.</p> | <p>X</p> | | <p>LDAÇ measures Scope 3 emissions encompassing its value chain, identifies reduction actions, and publicly discloses them in the '24 Sustainability Report.</p> | <p>Limak Çimento 2024 Sustainability Report pp. 149-150,175: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf</p> |
| <p>B15. The environmental benefits/gains and cost savings of initiatives/projects that aims reducing environmental impacts have been disclosed.</p> | <p>X</p> | | <p>The environmental benefits provided by R&D activities' initiatives and projects aimed at reducing environmental impacts have been comprehensively disclosed to the public in the '24 Sustainability Report prepared by our parent company Limak Çimento.</p> | <p>Limak Çimento 2024 Sustainability Report pp. 103, 156: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf https://www.limakcimento.com/en/sustainability/reports/cdp</p> |
| <p>B16. The data related to energy consumption (natural gas, diesel, gasoline, LPG, coal, electricity, heating, cooling, etc.) has been disclosed as Scope-1 and Scope-2.</p> | <p>X</p> | | <p>LDAÇ parent Limak Çimento group measures Scope 1-2 emissions, identifies reduction actions, and publicly discloses them in the Limak Çimento '24 Sustainability Report prepared for the Limak Çimento group .</p> | <p>Limak Çimento 2024 Sustainability Report pp. 152-153 https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf https://limakcimento.com/en/sustainability/bulletins</p> |
| | | | <p>The electricity generated from</p> | |

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| B17. The information related to production of electricity, heat, steam and cooling as of the reporting year has been disclosed. | | x | | renewable energy in the reporting year is made available to the relevant stakeholders by being published in ESG Bulletin Issue II on the corporate website of our main shareholder, Limak Çimento. | https://limakcimento.com/assets/images/bulten/2026-esg-bulletin-bulten_1769774311.pdf |
| B18. The studies related to increase the use of renewable energy and transition to zero/low carbon electricity have been conducted and disclosed. | X | | | LDAÇ's activities related to renewable energy use have been publicly disclosed under the material event disclosure template on the Public Disclosure Platform. (KAP) | https://www.kap.org.tr/en/Bildirim/1550918 Limak Cement 2024 Sustainability Report pp. 77 https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf https://limakcimento.com/en/sustainability/reports/cdp https://limakcimento.com/en/sustainability/bulletins |
| B19. The renewable energy production and usage data has been publicly disclosed. | X | | | Limak Çimento group data is shared with the public in ESG Bulletin Issue II published on the Limak Çimento corporate website. | Limak Çimento 2024 Sustainability Report p. 77: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf https://limakcimento.com/en/sustainability/reports/cdp https://limakcimento.com/en/sustainability/bulletins |
| B20. The Company conducted projects about energy efficiency and the amount of reduction on energy consumption and emission achieved through these projects have been disclosed. | X | | | LDAÇ's parent Limak Çimento group's data is shared with the public in ESG Bulletin Issue II published on the Limak Çimento corporate website. | Limak Çimento 2024 Sustainability Report p. 80: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf https://limakcimento.com/en/sustainability/reports/cdp https://limakcimento.com/en/sustainability/bulletins |
| B21. The water consumption, the amount, procedures and sources of recycled and discharged water from underground or above ground (if any), have been disclosed. | X | | | As stated in our parent group Limak Çimento's '24 Sustainability Report, water footprint inventory studies have been initiated at all our facilities within the framework of the ISO 14046 Water Footprint Standard for Limak Çimento group data. In this context, it has been publicly disclosed that efforts are being carried out to optimize our water consumption by tracking data related to green, blue, and grey water. | Limak Çimento 2024 Sustainability Report pp. 153-154: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf https://limakcimento.com/en/sustainability/reports/cdp https://limakcimento.com/en/sustainability/bulletins |
| B22. The information related to whether Company's operations or activities are included in any carbon pricing system (Emissions Trading System, Cap & Trade or Carbon Tax). | | | X | The Early Detection of Risk Committee is preparing for the risks and opportunities that will arise from the implementation of the Emissions Trading System ("ETS"). In addition, intensive efforts are being carried out on this matter in collaboration with the civil society organizations of which LDAÇ is a member. Within the scope of our current operational scope, LDAÇ is not yet subject to any mandatory carbon pricing mechanisms. | |
| B23. The information related to accumulated or purchased carbon credits within the reporting period has been disclosed. | | | X | While an ETS has not yet been implemented in Türkiye, preparations are underway for its anticipated introduction. Furthermore, with the commencement of the transitional | |

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| | | | period of the Carbon Border Adjustment Mechanism ("CBAM"), the required forms and reporting processes are being prepared. | |
| B24. If carbon pricing is applied within the Company, the details have been disclosed. | | X | While the ETS has not yet been implemented in Türkiye, preparations are underway for its anticipated introduction. Furthermore, with the commencement of the transitional period of the CBAM, the required forms and reporting processes are being prepared. | |
| B25. The platforms where the Company discloses its environmental information have been disclosed. | X | | Environmental disclosures are integrated in our main shareholder Limak Çimento's '24 Sustainability Report, CDP report, and sustainability bulletins. | https://www.limakdoguanadolucimento.com/sustainability Limak Cement 2024 Sustainability Report pp. 153-154: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf https://limakcimento.com/en/sustainability/reports/cdp https://limakcimento.com/en/sustainability/bulletins |
| C. SOCIAL PRINCIPLES | | | | |
| C1. Human Rights and Employee Rights | | | | |
| C1.1. The Institutional Human Rights and Employee Rights Policy has been established in the ligh of the Universal Declaration of Human Rights, ILO Conventions ratified by Turkey and other relevant legislation. The policy and the officals that responsible for the implementation of it have been determined and disclosed. | X | | As stated in the '24 Sustainability Report of our main shareholder, Limak Çimento, LDAÇ adopts international norms as the fundamental reference for its policies, particularly the core conventions of the International Labour Organization (ILO), the OECD Guidelines for Multinational Enterprises, the United Nations Global Compact, and the UN Women's Empowerment Principles (WEPs). It maintains zero tolerance for all forms of child labor as defined under ILO Convention No. 182, and firmly rejects forced labor, debt bondage, commercial sexual exploitation, and employment in illegal activities. It also does not accept under any circumstances the employment of children in work that may harm their health, safety, or development. | Limak Çimento 2024 Sustainability Report p. 108: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf |
| | | | LDAÇ expects all stakeholders in its value chain, including suppliers and business partners, to comply with the same high standards, and reflects this expectation in its contracts through explicit provisions. It regularly monitors and reports on | |

C1.2. Considering the effects of supply and value chain, fair workforce, improvement of labor standards, women's employment and inclusion issues (gender, race, religion, language, marital status, ethnic identity, sexual orientation, gender identity, family responsibilities, union activities, political opinion, disability, social and cultural differences, etc., such as non-discrimination) are included in its policy on employee rights.

X

human rights performance and manages it in accordance with the principles of transparency and accountability. As LDAÇ, we are committed not only to fulfilling legal requirements but also to developing pioneering and exemplary practices in the field of human rights. We regard respect for human rights as our fundamental responsibility and provide fair, inclusive, and discrimination-free work environments. In all human resources practices, from the recruitment process to remuneration, from access to training opportunities to promotion, separation, and retirement processes, we do not permit any element of discrimination based on religion, language, race, ethnicity, social status, birth, disability status, gender, sexual orientation, or union membership. We create inclusive work environments where every individual has equal opportunities and adopt as a fundamental principle the approach of treating all our employees in accordance with the principles of equality, justice, and inclusivity. This understanding is stated in our policies and in the '24 Sustainability Report of our parent company, Limak Çimento.

<https://www.limakdoguanadolucimento.com/investor-relations/corporate-governance/policies> Limak Cement 2024 Sustainability Report p. 108: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf

C1.3. The measures taken for the minority rights/equality of opportunity or the ones who are sensitive about certain economic, environmental, social factors (low income groups, women, etc.) along the supply chain have been disclosed.

X

LDAÇ publicly discloses the measures and practices taken throughout its value chain regarding the consideration of groups sensitive to certain economic, environmental, and social factors (in terms of low-income groups, women, and/or minority rights and equal opportunity). In this context, commitments and practices related to efforts carried out in line with the approach of inclusivity and equal opportunity are shared with stakeholders through

Limak Çimento 2024 Sustainability Report p. 108: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf

| | | | | relevant reports and corporate communication channels. | |
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| C1.4. The developments regarding preventive and corrective practices against discrimination, inequality, human rights violations, forced and child labor have been disclosed. | X | | | LDAÇ adopts international norms as the fundamental reference for its policies, particularly the core conventions of the International Labour Organization (ILO), the OECD Guidelines for Multinational Enterprises, the United Nations Global Compact, and the UN Women's Empowerment Principles (WEPs). It maintains zero tolerance for all forms of child labor as defined under ILO Convention No. 182, and firmly rejects forced labor, debt bondage, commercial sexual exploitation, and employment in illegal activities. LDAÇ does not accept under any circumstances the employment of children in work that may harm their health, safety, or development. This understanding is stated in the '24 Sustainability Report of our parent company, Limak Çimento. | Limak Çimento 2024 Sustainability Report p. 108: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf |
| C1.5. Investments in employees (education, development policies), compensation, fringe benefits, right to unionize, work/life balance solutions and talent management are included in the employee rights policy. | X | | | All investments made in human capital and talent management practices are detailed in the Sustainability Reports and ESG Bulletins of our parent group Limak Çimento. | Limak Çimento 2024 Sustainability Report pp. 108-119: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf https://limakcimento.com/en/sustainability/bulletins |
| C1.5. The mechanism for employee complaints and resolution of disputes have been established and related solution processes have been determined. | X | | | LDAÇ establishes mechanisms in line with its business ethics and compliance approach that enable employees to submit complaints, reports, and disputes in a safe and fair manner. Within the scope of these processes designed in accordance with ethical principles, applications are evaluated confidentially, examined impartially, and appropriate actions are taken. Thus, processes related to the resolution of disputes are defined through corporate procedures and operated effectively. This understanding is stated in the '24 Sustainability Report of our parent company, Limak Çimento. | https://www.limakdoguanadolucimento.com/investor-relations/corporate-governance/policies Limak Cement 2024 Sustainability Report p. 33: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf |

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| <p>C1.5. The activities carried out within the reporting period which related to ensure employee satisfaction have been disclosed.</p> | <p>X</p> | | <p>All investments in human capital and talent management practices are disclosed in the Sustainability Reports and ESG Bulletins. Furthermore, as part of our efforts to enhancing employee experience, the progress and outcomes of the Great Place to Work certification process is also shared with relevant stakeholders .</p> | <p>Limak Çimento 2024 Sustainability Report pp. 108-119: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf https://limakcimento.com/en/sustainability/bulletins</p> |
| <p>C1.6. The occupational health and safety policies have been established and disclosed.</p> | <p>X</p> | | <p>All Occupational Health and Safety (OHS) policies, activities, and targets adopted by LDAÇ are publicly disclosed in the Company's corporate web site and in the Sustainability Reports and ESG Bulletins of our parent company Limak Çimento.</p> | <p>https://www.limakdoguanadolucimento.com/files/PolicyonOccupationalHealthandSafety.pdf Limak Cement 2024 Sustainability Report pp. 134-137: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf https://limakcimento.com/en/sustainability/bulletins</p> |
| <p>C1.6. The measures taken for protecting health, preventing occupational accidents and related statistics have been disclosed.</p> | <p>X</p> | | <p>All Occupational Health and Safety (OHS) policies, activities, and targets adopted by LDAÇ are publicly disclosed in the Company's corporate web site and in the Sustainability Reports and ESG Bulletins of our parent company Limak Çimento.</p> | <p>https://www.limakdoguanadolucimento.com/files/PolicyonOccupationalHealthandSafety.pdf Limak Cement 2024 Sustainability Report pp. 134-137: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf https://limakcimento.com/en/sustainability/bulletins</p> |
| <p>C1.7. The personal data protection and data security policies have been established and disclosed.</p> | <p>X</p> | | <p>LDAÇ has established robust corporate policies and practices concerning personal data protection and information security. Its information security approach is built on the principles of confidentiality, integrity, and availability, utilizing advanced infrastructure and up-to-date policies to safeguard against unauthorized access, data loss, and cyber threats. Server-based backups and database copies are taken at regular intervals, and stored in separate physical environments for a minimum of one month. In addition, critical systems are hosted within a Data Center; Disaster Recovery Plans are implemented to mitigate potential risks, and the establishment of an additional Disaster Recovery Center (DRC) at a separate location remains on the agenda. As a result of these practices, there have</p> | <p>Limak Çimento 2024 Sustainability Report p. 106: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf https://limakcimento.com/en/sustainability/bulletins</p> |

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| | | | <p>been no data security breaches in the past four years. Furthermore, LDAÇ's commitment to information security is validated by the ISO 27001 Information Security Management System certification. This understanding is stated in the '24 Sustainability Report of our parent company, Limak Çimento.</p> | |
| C1.8. The ethics policy have been established and disclosed. | X | | <p>Guided by our Code of Business Ethics, Limak Doğu Anadolu Çimento (LDAÇ) adopts the policies and procedures of the Limak Group of Companies as core references, and integrates ethical conduct standards as an inseparable part of all its business processes. This approach ensures not only full compliance with our legal obligations but also embeds ethical alignment as a fundamental element of our corporate culture, reflected in all our stakeholder relationships.</p> | <p>https://www.limakdoguanadolucimento.com/investor-relations/corporate-governance/policies Limak Cement 2024 Sustainability Report p. 33: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf</p> |
| C1.9. The studies related to social investment, social responsibility, finansal inclusivity and access to finance have been explained. | X | | <p>Under the governance model structured in line with its sustainability strategy, the Company aims to contribute to social well-being through initiatives in social investment, corporate social responsibility, financial inclusion, and access to finance. The outcomes of these initiatives are disclosed annually to our stakeholders via our parent group Limak Çimento's Sustainability Report and ESG Bulletins.</p> | <p>Limak Çimento 2024 Sustainability Report pp. 138-142: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf https://limakcimento.com/en/sustainability/bulletins</p> |
| C1.10. The informative meetings and training programs related to ESG policies and practices have been organized for employees. | X | | <p>To enhance all departments' ownership of the core sustainability strategy and ensure their effective contribution, dedicated focus groups have been established under the leadership of the Sustainability Governance Committee, referencing the company's value creation points across Environmental, Social, and Governance (ESG) areas. Furthermore, to foster organization-wide awareness and competency,</p> | <p>Limak Çimento 2024 Sustainability Report p. 122: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf https://limakcimento.com/en/sustainability/bulletins</p> |

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| | | | sustainability-themed trainings have been developed and launched under the LCGA framework. | |
| C2. Stakeholders, International Standards and Initiatives | | | | |
| C2.1. The customer satisfaction policy regarding the management and resolution of customer complaints has been prepared and disclosed. | X | | As a member of Limak Çimento group , the Company continues its operations in line with the ISO 10002 Customer Satisfaction Management System and the ISO 9001 Quality Management System. The relevant management system certifications are publicly available to stakeholders on our corporate website and the corporate website of our parent company, Limak Çimento. The customer management approach is shaped by long-term collaborations based on customer satisfaction and trust, with proactive, fast, and solution-oriented communication prioritized across all touchpoints – from the order placement and shipment to after-sales technical support. Within this framework, customer feedback is regularly monitored through the Customer Satisfaction Surveys and Complaint Systems, and is used as an input for continuous improvement initiatives. | https://www.limakdoguanadolucimento.com/corporate/integrated-management-systems Limak Çimento 2024 Sustainability Report p. 105: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf https://limakcimento.com/en/sustainability/bulletins |
| C2.2. The information about the communication with stakeholders (which stakeholder, subject and frequency) have been disclosed. | X | | The company carries out its activities through mutual communication and collaboration with its stakeholders. Stakeholder engagement channels and the stakeholder prioritization approach are shared annually in the Sustainability Report. | Limak Çimento 2024 Sustainability Report pp. 59-64: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf https://limakcimento.com/en/sustainability/bulletins |
| | | | The '24 Sustainability Report of our parent company Limak Cement has been prepared in accordance with the GRI Standards and the World Economic Forum Stakeholder Capitalism Metrics. Throughout the preparation process, the Türkiye Sustainability Reporting Standards (TSRS) S1 and S2 provisions have also been taken into consideration. The reporting principles | |

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| C2.3. The international reporting standards that adopted in reporting have been explained. | X | | | and contractual commitments under the UN Women’s Empowerment Principles (WEPs) and the UN Global Compact (UNCG) — to which our parent company Limak Holding is a signatory — have also been integrated into our practices. Furthermore, the activities carried out in line with our material topics have been assessed in relation to the United Nations Sustainable Development Goals (UN SDGs). | Limak Çimento 2024 Sustainability Report p. 3: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf https://limakcimento.com/en/sustainability/bulletins |
| C2.4. The principles adopted regarding sustainability,the signatory or member international organizations, committees and principles have been disclosed. | X | | | The '24 Sustainability Report of our parent company Limak Cement has been prepared in accordance with the GRI Standards and the World Economic Forum Stakeholder Capitalism Metrics. Throughout the preparation process, the Türkiye Sustainability Reporting Standards (TSRS) S1 and S2 provisions have also been taken into consideration. The reporting principles and contractual commitments under the UN Women’s Empowerment Principles (WEPs) and the UN Global Compact (UNCG) — to which our parent company Limak Holding is a signatory — have also been integrated into our practices. Furthermore, the activities carried out in line with our material topics have been assessed in relation to the United Nations Sustainable Development Goals (UN SDGs). | Limak Çimento 2024 Sustainability Report p. 3: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf https://limakcimento.com/en/sustainability/bulletins |
| C2.5. The improvements have been made and studies have been carried out in order to be included in the Borsa Istanbul sustainability indices and/or international index providers. | | | X | | |
| D. CORPORATE GOVERNANCE PRINCIPLES | | | | | |
| | | | | Within the scope of its sustainability strategy, the Company implements the necessary mechanisms to strengthen communication with its stakeholders, and systematically takes stakeholder feedback into consideration when determining sustainability-related measures and strategies. In this regard, a materiality assessment has been | |

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| <p>D1. The opinions of stakeholders have been sought in the determination of measures and strategies related to sustainability field.</p> | <p>X</p> | | <p>conducted in line with current reporting standards and global trends; the findings derived from input collected from stakeholders were analyzed by the Sustainability Committee of our parent group Limak Çimento and integrated into the Company's processes . As a result of the assessment, 14 material topics aligned with the Company's corporate strategy were identified, and these topics continue to serve as key inputs for the sustainability strategy and corporate activities.</p> | <p>Limak Çimento 2024 Sustainability Report p. 64: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf https://limakcimento.com/en/sustainability/bulletins</p> |
| <p>D2. The social responsibility projects, awareness activities and trainings have been carried out to raise awareness about sustainability and its importance.</p> | <p>X</p> | | <p>Under the governance model structured in line with its sustainability strategy, the Company aims to contribute to social well-being by carrying out initiatives in social investment, corporate social responsibility, financial inclusion, and access to finance. The outcomes of these initiatives are shared with stakeholders annually through our parent company Limak Cement's Sustainability Reports and ESG Bulletins.</p> | <p>Limak Çimento 2024 Sustainability Report pp. 138-142: https://limakcimento.com/assets/images/dosya/sustainability-report-2024_1764770980.pdf https://limakcimento.com/en/sustainability/bulletins</p> |