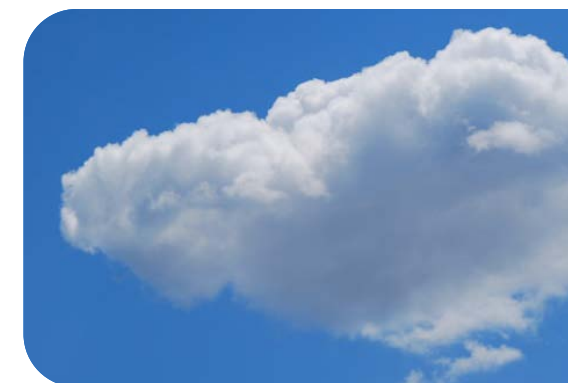
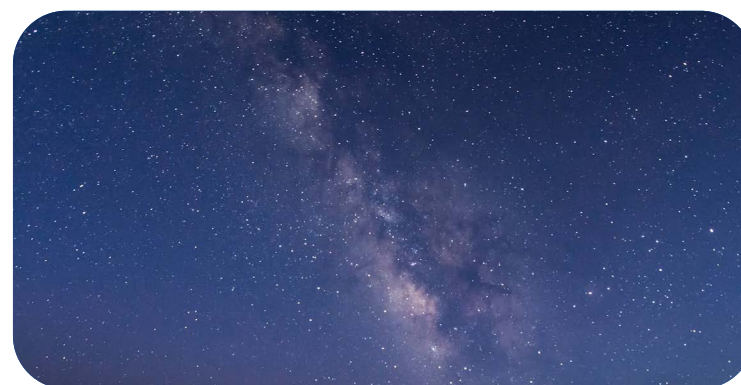
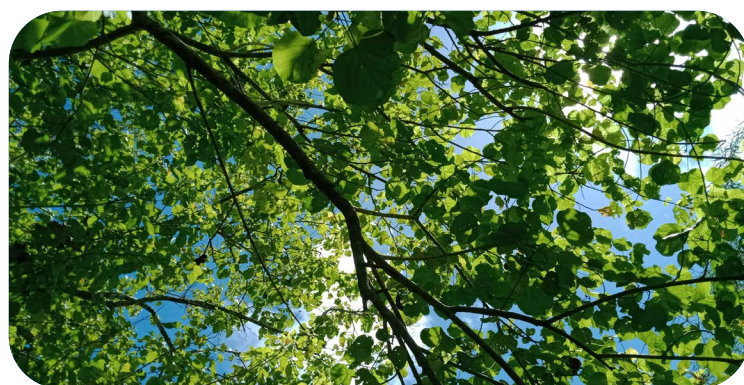


SUSTAINABILITY



IMPACT



REPORT



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ABOUT THE REPORT

ABOUT THE REPORT

Semtrio is a sustainability consultancy that provides best-in-class services in environmental and corporate sustainability, guiding businesses with tailored climate solutions that create lasting impact.

We are proud to share our recent performance, including our sustainability strategies, our achievements, and our goals with you in our second sustainability report.

As a member of the Global Reporting Initiative (GRI) Community, our sustainability report has been prepared in accordance with the GRI Standards for the period of January 1, 2023 - December 31, 2024.

This report also includes our progress in the 4 pillars (Human Rights, Labor, Environment, and Anti-Corruption) of the world's largest global sustainability initiative, the UN Global Compact, of which we have been a signatory since 2021.

At Semtrio, we appreciate feedback and suggestions regarding this report and our sustainability efforts in general.

You can share your thoughts at the following email address:

sustainability@semtrio.com



Message From the CEO



At Semtrio, we consider sustainability reports to be roadmaps for action, guiding businesses as they integrate sustainability into their operations and adapt to an evolving economy. Our second sustainability report reflects our commitment to collaborating with businesses through this transformation.

Sustainability and Economic Growth Are No Longer Separate Conversations

The economic landscape is rapidly changing, driven by evolving market dynamics and expectations from investors and consumers. As businesses navigate these changes, sustainability is no longer a peripheral concern—it is integral to corporate resilience and growth.

Companies that proactively embed sustainability into their strategies not only mitigate risks but also unlock new opportunities for growth and innovation.

In the face of these challenges, sustainability must not be seen as a trade-off. At Semtrio, we know that sustainability and financial success are not competing priorities. The question is not if companies should take action but how they can transition while growing their businesses in the years to come.

Even in the absence of strict regulatory mandates, the benefits of sustainable transformation are clear. Companies that embrace sustainability enhance

their competitive positioning, attract investment, and future-proof their operations against evolving market conditions.

A Multi-Faceted Approach to Sustainability

At Semtrio, we recognize that sustainability journeys are not linear, and businesses require tailored solutions at every stage. To address this complexity, we have restructured our services around two key pillars that provide both strategic direction and actionable pathways.

Through the ESG Excellence Pathway, we help companies build strong ESG foundations with expert advisory, reporting, and ratings services.

Simultaneously, the Net Zero Transition Journey guides companies toward climate resilience with our carbon accounting, strategy development, target-setting, disclosure and Second-Party Opinion services.

By leveraging our holistic, end-to-end solutions, businesses can seamlessly integrate sustainability into their decision-making processes, comply with global regulatory frameworks, and enhance their market credibility.

With this structured yet dynamic approach, sustainability is no longer an isolated function—it is embedded in business strategy, supply chains, and value creation, driving long-term success.

Message From the CEO

Transforming Vision into Impact

We measure our success by the impact we create. In 2024, we saw meaningful progress in leadership diversity, with a significant increase in women's representation at executive and management levels. This shift aligns with our broader sustainability mission—ensuring inclusivity and resilience in every aspect of business.

34 of the 42 companies we have worked with have secured a place on the CDP Global A-List, a recognition of their leadership in sustainability transparency and climate action.

We are a signatory of the United Nations Global Compact and endorse its Ten Principles on human rights, labor, environment, and anti-corruption, and we integrate these principles into our governance practices.

We are also proud to be Türkiye's only EcoVadis training partner, helping businesses navigate the EcoVadis evaluation process while applying our firsthand experience as an EcoVadis Gold Medal recipient.

Our expertise is trusted by some of Türkiye's biggest businesses—8 of the 10 largest brands rely on Semtrio for their sustainability strategies. We were selected by the Turkish Ministry of Trade as one of the few Responsible Program advisories authorized to help companies secure

financial support for sustainability investments under the European Green Deal.

We led the development of the first-ever Climate Transition Plan in the aviation industry for Turkish Airlines, setting a new standard for the sector. We have supported \$2.8 billion in sustainable financing through 12 SPO reports, demonstrating our proficiency in facilitating large-scale climate investments.

Building Knowledge, Building the Future

Beyond measurable impact, we recognize that true transformation requires growth across our whole community. That's why we invest heavily in education and knowledge-sharing, ensuring that sustainability is embedded not just in strategies but in mindsets.

We launched a 10-part Masterclass series on performance-driven sustainability reporting, which will continue in 2025. We have provided extensive training, both online and in-person, working with CDP, KalDer, ERTA, and B Lab Europe to deliver webinars, corporate training, and industry-specific regulatory workshops that help businesses navigate evolving regulatory landscapes with confidence.

Our commitment to knowledge-building extends beyond corporate training. We actively engage with the next generation of sustainability leaders at university events, sharing our insights and

fostering collaboration between industry and academia.

With a high percentage of young professionals and a progressive leadership pipeline, we are fostering expertise at every career stage.

Semtrio Looks Ahead

The transition to net zero is complex, but it is not optional. The businesses that act today will be one step ahead in the future. That is why, at Semtrio, our mission remains clear: helping businesses move from commitment to action, from risk to opportunity, and from compliance to leadership.

This mission-aligned work is made possible by the trust of our clients, the collaboration of our partners, and the dedication of our team. I would like to express my gratitude for your commitment to driving meaningful change and being a part of this journey.

İlker Turan
CEO

ABOUT SEMTRIO

SEMTRIO: BE PRESENT, THINK FORWARD

80%

Employee Satisfaction

A thriving workplace where people feel valued and empowered.



31

Talented Professionals

A close-knit team driving sustainable impact together.



68%

Women Workforce

Championing diversity and inclusion at every level.



180

Hours of Training

Continuous learning fuels our growth and innovation.



100%

Regular Performance & Career Reviews

Every team member receives consistent feedback and support.



A. About Semtrio

Semtrio offers sustainability consultancy on a global scale, aligning corporate strategies with sustainability targets and turning climate risks into opportunities in the net-zero transition.

Semtrio — Your Climate Strategy Partner

We turn ambitions into real-world climate action through the ESG Excellence Pathway and the Net Zero Transition Journey. Our ESG Excellence Pathway enables businesses to form strong ESG foundations through reporting, ratings, and strategic advisory, ensuring compliance with evolving global standards. Meanwhile, the Net Zero Transition Journey delivers science-based decarbonization strategies, target-setting, and carbon accounting, building capacity for companies to achieve measurable climate impact.

Transform Vision into Impact with Semtrio

As a CDP Accredited Partner, EcoVadis Training Partner and Gold Medal recipient, and one of Türkiye's highest-rated B Corps, we help businesses navigate the sustainability landscape with precision and confidence. By integrating data-driven insights, regulatory expertise, and cutting-edge climate solutions, we help organizations seamlessly transition toward a resilient, net-zero future.



B. Milestones

2016

Semtrio was founded.



2019

Established UK-based Co₂nsensus.

Climate Positive Business.



2021

UN Global Compact Participant

Launched CO₂Mission in partnership with Turkish Airlines



2023

Guided VakıfBank to become Türkiye's first SBTi-approved bank

Completed the first Climate Transition Plan for Turkish Airlines

TNFD Forum Member



2017

Joined the Boğaziçi Technopark ecosystem.



2020

Certified Body for the C2C Platform

Auditor for the Alliance for Water Stewardship

Certified B Corporation

GRI Community Member



2025

2022

CDP Accredited Solutions Provider

Recognized by B Corp in the Best for the World: Workers category



2024

80% Global A-List rate for CDP projects

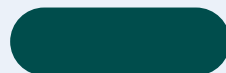
Approved EcoVadis Training Partner

EcoVadis Gold Medal Recipient with top 5% Sustainability Performance

Responsible® Accredited Partner

Issued Second Party Opinions which facilitated \$2.8 billion in sustainable financing





C. Our Vision, Mission and Values

Vision & Mission

Mission

We deliver top-of-the-line sustainability services across diverse sectors to align corporate strategies with environmental stewardship.

Vision

To inspire a ripple effect of positive change by equipping businesses and the broader community with the knowledge, tools, and strategies needed for a sustainable future.

Values

Future-Ready Mindset

By closely monitoring regulations and global dynamics, we provide forward-looking insights that extend beyond current projects, helping businesses anticipate change and navigate sustainability challenges with confidence.

Transformative Impact

We turn sustainability ambitions into measurable, lasting results. Our solutions go beyond compliance, driving real change in businesses, industries, and communities.

Data-Driven Transparency

Our science-based approach ensures informed decision-making through accurate reporting, regulatory alignment, and full accountability in sustainability disclosures.

Strategic Excellence

We provide insight-driven strategies aligned with climate targets and global standards, enabling businesses to optimize their ESG performance and seamlessly integrate sustainability into their core strategies.

Collaborative Action

We foster strong partnerships and engage with stakeholders to co-create tailored strategies that align with each client's unique goals, accelerating progress toward a net-zero future.



D. Our Management Strategy

We are headquartered in Istanbul, having adopted a bootstrapped growth model. Our management approach is shaped by long-term strategic planning and thorough risk and opportunity assessments. We prioritize ethical, transparent, and accountable governance—supported by open and direct communication across all levels of the organization.

Transparency and accountability are not just values we uphold; they are essential to strengthening financial performance and brand equity. To that end, we maintain a continuous and meaningful dialogue with our employees and stakeholders, using a wide range of communication tools to ensure clarity, trust, and alignment.

Building on this foundation, we operate in line with international standards of corporate governance, customer satisfaction, sustainability, and social responsibility. These principles guide our every step and allow us to remain adaptable in a rapidly changing world. We are proud to be part of a global network of future-focused companies, those leading the climate agenda in their sectors and shaping vibrant cultures through bold, original ideas. These partnerships empower us to grow with purpose and resilience.

Looking ahead, we remain committed to evolving our management strategy in line with the dynamic global landscape. By staying agile, impact-driven, and connected to our

stakeholders, we aim to lead with purpose, create lasting value, and contribute meaningfully to a more sustainable and resilient future.

E. Partner Companies

In the Peerless Ventures ecosystem, companies are called “frontiers” because they are at the forefront of innovation in sustainability and lead transformation across industries to improve our impact on the planet.

Through this ecosystem, Semtrio is connected to a powerful network of experts—each frontier specializes in a key climate-centered field, combining our diverse strengths to address unique challenges and create meaningful change.

The Peerless Ventures frontiers offer holistic, end-to-end services—integrating strategic climate communication, creative design, cutting-edge climate-tech software, and carbon management solutions—to help businesses navigate the evolving sustainability landscape.

We collaborate with other Peerless Ventures frontiers to create tailored solutions that align with each client’s unique sustainability goals and drive meaningful climate impact.

THE PEERLESS VENTURES FRONTIERS



THE ARCHITECT

Climateware is a climate-tech company that offers practical and scalable solutions that help businesses of all sizes manage their carbon footprints and build climate resilience. Carboneck is Climateware's best-in-class digital carbon management platform, which enables organizations to calculate, analyze, and report their emissions with precision. Using Carboneck, organizations can ensure regulatory compliance, demonstrate climate leadership, and accelerate their net zero journey.



THE COMMUNICATOR

springfox specializes in uniting creativity with clarity to craft evidence-based, research-driven sustainability communication. With the mission of delivering clear and trustworthy climate communication, springfox supports companies in engaging in impactful dialogues about their sustainability activities.



THE PROJECT DEVELOPER

Net Zero Climate Investments is an impact-focused emission reduction project developer and climate strategy consultant, driving real change to scale the impact of climate action. This frontier helps businesses navigate the complexities of decarbonization with customized end-to-end climate solutions, specializing in community-based projects and nature-based solutions.

OUR SUSTAINABILITY JOURNEY

OUR SUSTAINABILITY JOURNEY

Sustainability is not a destination—it's a continuous journey. With innovation, collaboration, and a deep respect for our planet, we work towards a future where progress and responsibility go hand in hand. Together, we turn commitment into action, forging a path toward lasting impact.

A. Sustainable Governance

As Semtrio, we believe that sustainable governance lies at the heart of building a better future — for our business, for our stakeholders, and for the world we want to be part of. We see governance as a strategic approach that shapes our decisions, guides our values, and drives us to create a lasting positive impact.

Since the very beginning of our sustainability journey in 2016, we have been working to embed sustainability principles into every area of our business. Today, sustainability is not just a service we offer to our clients — it is how we operate, how we lead, and how we shape our future.

To stay resilient in an ever-changing world shaped by environmental, social, economic, and technological developments, we closely monitor emerging risks and opportunities. We continuously strengthen our governance structure to ensure that we manage these dynamics responsibly and effectively.

Our Sustainability & ESG Department, reporting directly to our CEO, is one of the main pillars of this structure. This department brings together sustainability consultants, team leaders, and project managers, operating in two main areas: data calculation and sustainability reporting. This enables us to turn sustainability into measurable, actionable, and accountable results across all our operations.

At the same time, we know that good governance requires inclusive platforms where different perspectives come together, responsibilities are shared, and progress is monitored transparently. That is why we have established several dedicated committees to manage key environmental, social, and governance (ESG) topics across our organization.

Each of these committees plays a vital role in our sustainable governance approach and is structured to bring together expertise from different teams within Semtrio. These committees and their responsibilities are outlined below:



Environmental Committee

Through our Environmental Committee, we shape our environmental strategy, set targets, monitor performance, and lead awareness and

training activities. We evaluate environmental risks and opportunities, and work on reducing our environmental footprint.

Our Environmental Committee includes our CEO, Climate Solutions Director, and Project Managers from both our Sustainability Solutions and Climate Solutions teams. We come together to ensure that environmental issues are addressed through collaboration, data-driven insights, and proactive management.



Board of Ethics

Our Board of Ethics is responsible for promoting ethical conduct, investigating any violation of our ethical rules, and ensuring alignment with our risk management practices. We provide regular training programs to raise awareness and build an ethical culture across our organization.

The Board of Ethics is composed of our CEO, Climate Solutions Director, and Human Resources Executive. We review the Board's activities annually, taking into account stakeholder feedback, monitoring results, and changes in regulations or standards.



Whistleblowing Committee

With our Whistleblowing Committee, we protect transparency and integrity at every level of our business. This committee ensures that all employees and external stakeholders can safely report any concern or misconduct in full confidentiality, without fear of retaliation or discrimination.

This committee consists of our CEO, Sustainability Director, Human Resources Executives, and our Legal Advisor — working together to evaluate reports and take necessary actions in line with our internal procedures.



Labor and Human Rights Committee

We are committed to creating a fair, inclusive, and respectful workplace. Our Labor and Human Rights Committee develops and reviews policies in line with international standards and local regulations. We monitor progress through KPIs, track awareness levels, and actively listen to the feedback of our employees and stakeholders.

This committee brings together our CEO, Climate Solutions Director, Human Resources Executive, Project Managers from our Sustainability Solutions and Climate Solutions teams, and Employee Representatives — ensuring that diverse perspectives shape our human rights practices.



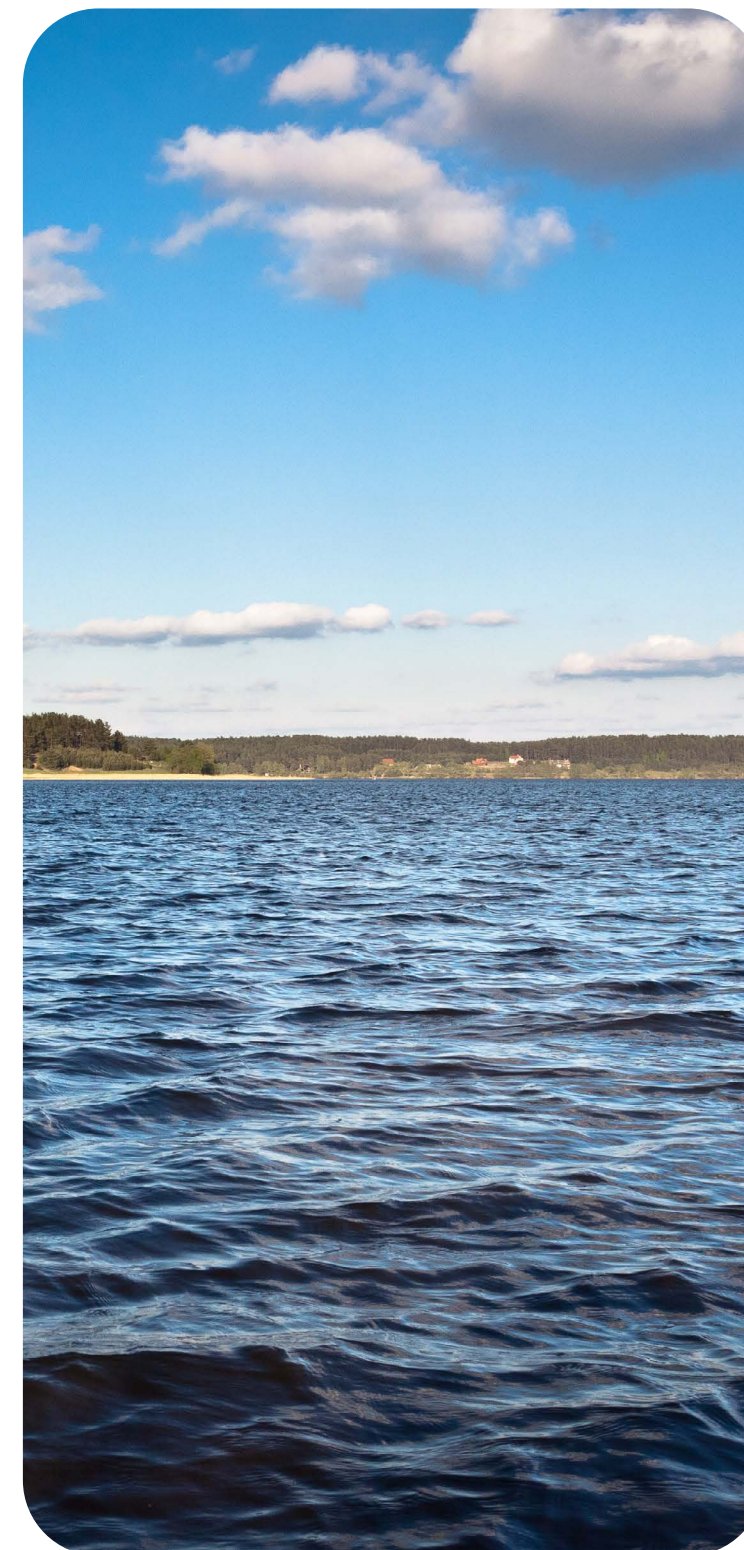
Sustainable Trade Committee

We take responsibility for promoting sustainable trade practices not only within our own operations but also across our entire value chain. Our Sustainable Trade Committee ensures compliance with our Supplier Code of Conduct, manages supplier risk assessments, and supports responsible sourcing practices.

This committee includes our CEO, Climate Solutions Director, Project Managers from both sustainability teams, and representatives from our Accounting Department, Purchasing & Administrative Affairs, and Sales & Business Development teams. Together, we work to ensure that sustainability is embedded in every part of our supply chain.

Through this comprehensive governance framework, we aim to transform sustainability from a strategic vision into a daily practice. We know that sustainable governance is not a destination, it is an ongoing commitment that requires accountability, collaboration, and continuous improvement.

At Semtrio, we are dedicated to strengthening this structure every day to create value for our business, for all our stakeholders, for society, and for the planet.



B. Our Value Creation Model

We create value by embedding environmental and social responsibility into business strategy, helping organizations strengthen their climate resilience and drive sustainable growth. In the reporting period, our service offerings were diversified to drive greater impact by supporting businesses in adapting to new sustainability challenges and opportunities. **By maximizing our resources and operational capacity, we continue to lead the sector and develop innovative sustainability solutions.**

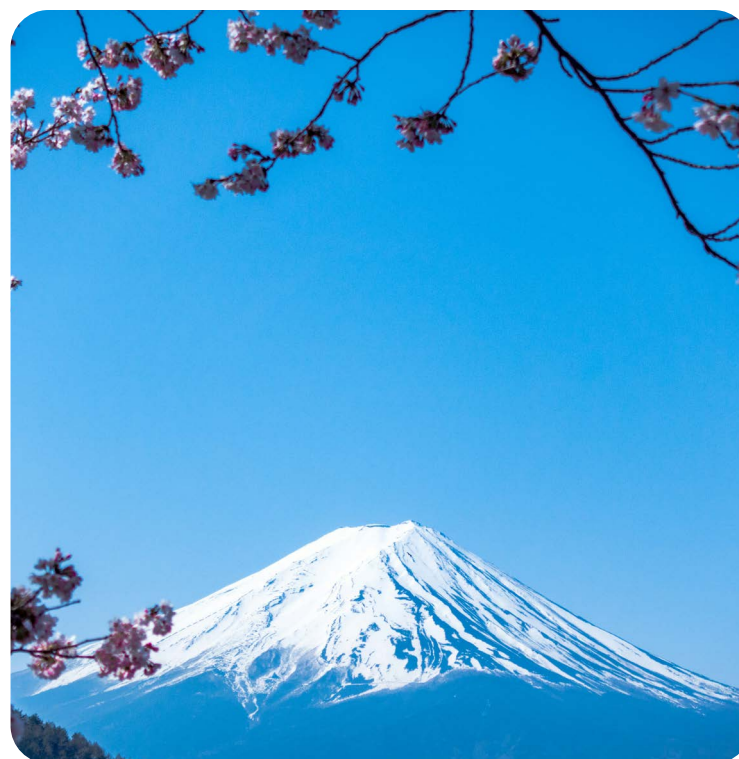
At Semtrio, our approach is built on two key frameworks: the ESG Excellence Pathway and the Net Zero Transition Journey. The ESG Excellence Pathway helps businesses strengthen their ESG foundations through reporting, rating, and strategic advisory services.

This route enables organizations to enhance transparency, meet stakeholder expectations, and stay ahead in an evolving regulatory landscape.

The Net Zero Transition Journey provides a structured path toward decarbonization, guiding businesses through carbon accounting, target-setting, and long-term climate resilience strategies.

With these two frameworks, we turn sustainability into a driver of competitive advantage and innovation, rather than an obligation.

Beyond service delivery, we equip organizations with the knowledge and tools to navigate evolving regulations, mitigate risks, and optimize resources. **Our approach ensures sustainability is embedded in decision-making, creating lasting value and resilience in a low-carbon economy.**



Value Created by Semtrio:



Data-Driven
Strategic Planning



Operational Efficiency
& Cost Optimization



Strengthened Investor
& Stakeholder Trust



Improved ESG Ratings
& Market Recognition



Future-Ready
Business Models



Actionable Sustainability
Roadmaps

We empower organizations of all kinds with the tools to lead, innovate, and drive real change, delivering solutions that create sustainable transformation.

C. Our Commitments

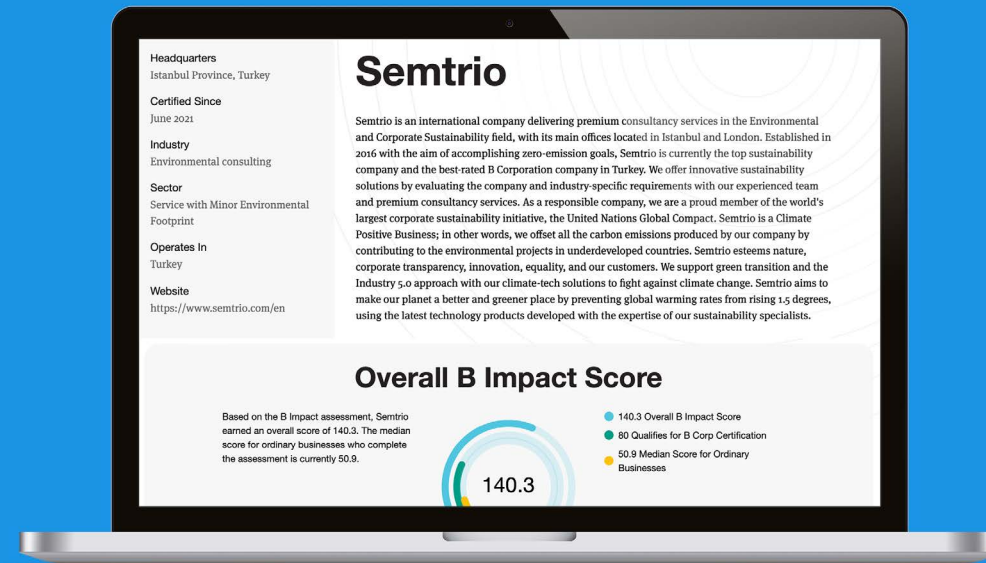
As a Certified B Corporation since 2021, we are proud to be part of a global movement of companies using business as a force for good.

B Corps integrate purpose into their operations, driving systemic change by balancing profit with positive impact for people and the planet.

At Semtrio, we initially achieved a B Impact Assessment score of 128, highlighting our alignment with high standards of environmental and social performance.



In 2025, we successfully completed our re-certification with a score of 140.3 — a 12-point increase that reflects our drive for continuous improvement and our ambition to lead by example.



Being part of a global community of over 2,500 purpose-driven companies strengthens our collaborative efforts and inspires us to lead sustainability transformation in Türkiye.

In 2021, we formalized this commitment by signing the B Corp Declaration of Interdependence, pledging to create long-term value for all stakeholders and contribute to an inclusive, equitable, and regenerative economy.

We are also proud participants in the B Corp Climate Collective's Net Zero 2030 initiative, aligning ourselves with companies dedicated to reaching net-zero emissions by 2030.

We take responsibility for our carbon footprint by reducing emissions at source and offsetting unavoidable emissions through internationally verified carbon offset projects — enabling us to operate as a Carbon Neutral company.

1. The B Corp Way

The B Corp Way is an initiative developed by the team leading the European Certified B Corporation movement, aimed at providing large enterprises and multinational companies operating in Europe with access to tailored B Corp consultancy services.

As an active participant in this initiative, we are proud to offer three dedicated services designed to support businesses on their B Corp journey and help them align with the movement's values and standards.

 [Click here for our B Corp Way Service Steps](#)

Our B Corp Way services include:

1.1. Carbon B Radical:

Our Carbon Management service offers a holistic approach designed to support companies in measuring, managing, and reducing their greenhouse gas emissions over the medium and long term. We provide end-to-end guidance by developing tailored carbon management strategies that address the specific needs and goals of each client.



1.2. Radical Transformation:

We specialize in providing tailored advisory services on sustainable management and strategy, supporting our clients in developing customized impact models that align with their unique priorities, goals, and operational context.

ESG Management:

We prioritize the sustainable growth of our partner brands by establishing a balanced system between factors such as production, profitability, consumption, and benefit. In addition to financial transactions, our ESG assessments provide a comprehensive evaluation of our clients' ESG performance by synthesizing qualitative and quantitative data.

Disclosure Management:

The appropriate method of disclosure for a company presents company's performance in a triple bottom line format. We identify how an organization will contribute, or plans to contribute, to the improvement or deterioration of economic, environmental, and social conditions at a local, regional, or global level in the future. We conduct analyses that have a significant impact on stakeholders, including shareholders, the public, suppliers, employees, customers and the executive level.

Creating Impact:

We offer consultancy throughout the process of identifying, analyzing, reporting, and integrating issues into the management system, and provide

support with the goal to create long-term value by identifying strategies that will further advance the company's financial success.

1.3. SDGs and the B:

We collaborate with our clients to align their sustainability efforts with the United Nations Sustainable Development Goals (SDGs), translating global frameworks into actionable business practices. Using tools like the SDG Action Manager, we assess current performance, map project outputs to relevant SDG targets, and co-create new project ideas that contribute to sustainable economic, social, and environmental development. Our approach ensures that sustainability strategies are measurable, monitored, and continuously improved through well-defined KPIs.

2. UN Global Compact

As a participant of the United Nations Global Compact (UNGC) since 2021, we are committed to fostering a responsible and sustainable business culture that respects human rights, upholds ethical values, and protects the environment.

Being part of the world's largest corporate sustainability initiative, alongside more than 9,500 companies globally, reinforces our dedication to driving positive change for both people and the planet.

The Ten Principles of the UN Global Compact — covering human rights, labor practices, environmental responsibility, and anti-corruption

— guide us in integrating sustainability into the very core of our strategies and daily operations. The Ten Principles of the UNGC are outlined as follows:

2.1. Human Rights:

- Support and respect recognized human rights.
- Refrain from complicity in human rights abuses.

2.2. Labor:


- Support workers' freedom of association and collective bargaining.
- Abolish the use of forced and compulsory labor.
- Eliminate all forms of child labor.
- Eliminate discrimination in recruitment and placement.

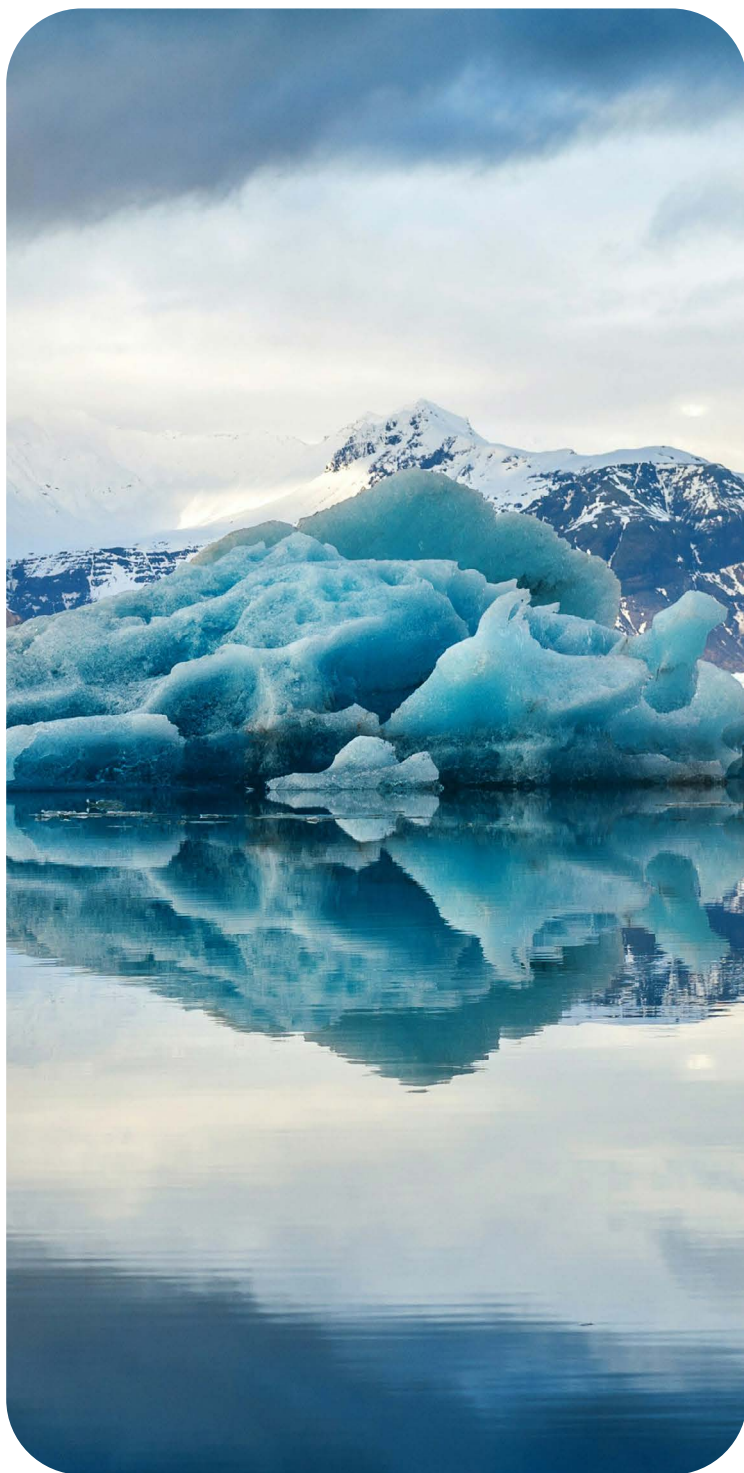
2.3. Environment:

- Support precautionary approaches to environmental challenges.
- Support all activities and organizations that promote environmental responsibility.
- Support the development and diffusion of environmentally friendly technologies.

2.4. Anti-Corruption:

- Combat corruption in all its forms, including bribery and extortion.

 [Click on the principles to see our compliance with the Ten Principles of the UN Global Compact.](#)



3. Climate Positive Business

As a Climate Positive Business, we at Semtrio are proud to go beyond simply offsetting our carbon emissions — we actively remove more carbon from the atmosphere than we generate, effectively neutralizing and exceeding our organizational carbon footprint.

Driven by our ambition to lead by example and inspire positive change within our industry, we are dedicated to combating climate change, starting with our own operations. Across our entire value chain, we consistently take action to minimize our environmental impact and reduce our carbon emissions.

Through our collaboration with Co₂nsensus, we offset the emissions generated by both our employees and our operations, while supporting environmental projects that play a vital role in driving social and economic development in less developed regions. These projects not only enable us to neutralize our emissions but also allow us to create meaningful environmental and social value.

 [For more detailed information about Climate Positive Business, please click here.](#)

4. SBTi Partnership

The Science Based Targets initiative (SBTi) is a globally recognized partnership established by CDP, the United Nations Global Compact (UNGC), the World Resources Institute (WRI), and the World Wide Fund for Nature (WWF). The initiative guides companies in setting near-term and long-term emission reduction targets that are scientifically validated and aligned with limiting global warming to 1,5°C, in line with the goals of the Paris Agreement.

As an official partner of the SBTi, we provide specialized consultancy services to support organizations in defining, developing, and implementing science-based decarbonization strategies. Our expertise helps companies not only set ambitious climate targets but also integrate these goals into their core business strategies to accelerate their transition to a low-carbon future.

Through our partnership with SBTi, we enable businesses to take credible climate action, demonstrate environmental leadership, and contribute to global net-zero efforts by aligning their emissions reduction targets with the latest climate science.

 [For more detailed information about our SBTi services, please click here.](#)

5. GRI Community Member

Transparency lies at the core of our sustainability approach. As an active member of the Global Reporting Initiative (GRI) Community since 2016, we are committed to preparing sustainability reports that are fully aligned with the GRI Standards, ensuring credibility, accountability, and global alignment in all our reporting practices.

In addition to the GRI Standards, we integrate key performance indicators (KPIs) from the SASB framework, enabling us to deliver reporting solutions that meet internationally recognized best practices for transparency, consistency, and comparability.

Our engagement within the GRI Community — a global network of over 500 organizations — allows us not only to stay informed about the latest trends and evolving reporting standards, but also to contribute directly to the development and advancement of the GRI Standards themselves. At Semtrio, we take pride in leveraging this collective knowledge and expertise to deliver high-quality, impact-oriented sustainability reports that create value for our clients and their stakeholders.

 [For more detailed information about GRI reporting services, please click here.](#)

6. ISO 27001 Information Security Management Certification

We recognize the importance of data security in responsible business practices. Our Information Security Management System is certified to ISO 27001 standards, reflecting our commitment to safeguarding the confidentiality, integrity, and availability of information across all our operations.

7. CDP Accredited Provider

We are proud to be the first and only company in Türkiye to be accredited by CDP in two critical categories: Climate Change, and SBTi. This achievement reflects not only our deep expertise in sustainability consulting but also our commitment to supporting companies in aligning with global best practices in environmental disclosure and performance management.

Our strategic partnership with CDP — the world's leading environmental disclosure platform — enables us to provide organizations with internationally recognized guidance throughout their sustainability journey. Leveraging this accreditation, we deliver tailored consultancy services that support companies in enhancing their environmental transparency, improving their CDP scores, and effectively managing climate-related risks and opportunities.

Strengthening our consulting capabilities with CDP accreditation allows us to offer strategic roadmaps

that help businesses integrate sustainability into their core operations, accelerate their transformation processes, and contribute to a low-carbon economy.

 [For more detailed information about CDP, please click here.](#)

8. EcoVadis Approved Training Partner

EcoVadis provides one of the world's most trusted sustainability ratings, assessing companies across four key themes: Environment, Labor & Human Rights, Ethics, and Sustainable Procurement.

The EcoVadis assessment framework is built on internationally recognized standards such as the Global Reporting Initiative (GRI) and the UN Global Compact, ensuring a comprehensive evaluation of both company and supply chain sustainability performance.

As an EcoVadis Accredited Partner, we empower companies to enhance their sustainability practices and strengthen their performance in line with global benchmarks. Leveraging our expertise, we provide strategic guidance throughout the EcoVadis assessment process, enabling organizations to identify improvement areas, close performance gaps, and increase their visibility in sustainable supply chains.

In 2024, our own commitment to sustainability was recognized globally, placing us among the top 5% of companies worldwide and earning us the prestigious EcoVadis Gold Medal. This achievement not only reflects our dedication to continuous improvement but also strengthens our ability to create shared value for our clients.

At Semtrio, we proudly transfer this knowledge and experience to the organizations we work with — supporting them in transforming sustainability challenges into opportunities for growth, resilience, and positive impact.

 [For more detailed information about EcoVadis services, please click here.](#)

7 Foundational Principles of EcoVadis



Evidence Based



Assessment by International Sustainability Experts



Industry, Location and Size Matter



Traceability and Transparency



Diversification of Sources



Excellence Through Continuous Improvement



Technology is a Must

D. Sustainable Collaborations

Today's world offers limitless opportunities for growth and development — yet our planet's resources remain limited. At Semtrio, we combine technology, innovation and our commitment to sustainability to create solutions that support a better future.

We know that meaningful and lasting impact is only possible through collaboration. That's why we work together with leading organizations that share our vision and values, joining forces to accelerate the sustainability transformation.

Below are some of the partnerships that help us expand our impact and drive change:

Mono App:

We are pleased to announce our strategic partnership with Mono App, a next-generation digital marketing platform that offers an innovative alternative to traditional SMS communication through mobile notifications. Through this collaboration, users can earn MonoPoints by engaging with notifications from their favorite brands, which can be redeemed for purchases or donated to meaningful causes. This approach not only enhances the digital marketing experience but also creates opportunities for positive social and environmental impact. Our partnership with Mono App enables us to contribute to renewable energy investments and support the economic and social development of disadvantaged communities around the world. As the urgency of

addressing climate change continues to grow, we believe that enabling individuals to take meaningful action is more important than ever.

By working together, we aim to empower individuals to offset their carbon footprint and actively participate in the transition towards a more sustainable future. Together with Mono App, we are proud to be driving innovative solutions that promote responsible consumption, climate action, and inclusive development.

KONTEK:

We are pleased to announce our strategic partnership with KONTEK, one of the leading companies in the renewable energy sector, to promote climate action and support the transition to a low-carbon future. As part of this collaboration, we have launched the Green One Step project — a practical and reliable tool designed to help both individuals and businesses calculate their carbon footprint and take action accordingly. Through this initiative, KONTEK provides renewable energy solutions via the platform yesilbiradim.com, empowering users to take concrete steps towards reducing their environmental impact. In a world where approximately 80% of global energy consumption still relies on fossil fuels, we believe that accelerating the adoption of renewable energy is critical. Together with KONTEK, we aim to encourage individuals and organizations to take meaningful action and be part of the solution for a more sustainable and climate-resilient future.



TAYSAD:

Our collaboration with TAYSAD brings the automotive industry one step closer to achieving zero-carbon goals within the Industry 5.0 transformation.

As the leading representative of Türkiye's automotive supply industry with 477 members, TAYSAD is taking a significant step toward a sustainable future by transitioning to Industry 5.0 under the guidance of our carbon management platform, Co₂nnectorPro. This partnership plays a strategic role in supporting the industry's efforts to reduce carbon emissions and embrace next-generation manufacturing practices.

ERTA:

Together with ERTA, we organized a comprehensive training program focused on corporate carbon footprint calculation and implementation based on the ISO 14064-1:2018 standard. This collaboration aimed to enhance institutional knowledge and capacity around greenhouse gas (GHG) accounting and management. The training covered key technical principles of the ISO 14064 standard, including GHG monitoring, reporting, verification, and reduction strategies, as well as materiality analysis and inventory quality management.

By combining theoretical content with practical application, the program helped participants gain a clear understanding of how to accurately define organizational and operational boundaries, select appropriate emission factors, and assess the significance of different emission sources.

Through this partnership, we continue to empower institutions with the tools and know-how to build reliable GHG inventories and take meaningful steps in their climate action journey.

KALDER:

As part of a collaboration launched in 2024, Semtrio and KalDer Bursa Branch have organized a series of training programs for KalDer members in the field of sustainability.

These programs have focused on key topics such as climate change, the European Green Deal, the Carbon Border Adjustment Mechanism (CBAM), and green transformation in industry, aiming to enhance awareness and build capacity among participants.

Additionally, within the scope of this partnership, Semtrio offers KalDer Bursa members preferential pricing on its services. This enables members to receive professional support on their sustainability journey while benefiting from cost advantages. KalDer Bursa, a well-established non-governmental organization committed to promoting a culture of quality and excellence, represents members from a wide range of sectors. Through this collaboration, Semtrio continues to expand its impact by sharing its expertise in sustainability with a broader audience and contributing to positive corporate social outcomes.

E. Materiality Analysis

At Semtrio, we are committed to building a sustainable future through strategic action and long-term thinking. As part of this commitment, we carried out a comprehensive Materiality Analysis to better understand the environmental, social, and governance (ESG) issues that matter most to our business and the world around us.

To guide this process, we reviewed internationally recognized standards and frameworks, including the Global Reporting Initiative (GRI), the Sustainability Accounting Standards Board (SASB), MSCI ESG Ratings, EcoVadis, and Refinitiv ESG scoring methodologies. We also examined the priorities of leading companies in our sector, allowing us to benchmark our approach against global best practices and stay aligned with evolving stakeholder and regulatory expectations.

Rather than relying solely on external input, we focused on an in-depth internal assessment to identify the sustainability topics most relevant to our operations. We evaluated each topic from a double materiality perspective—looking both at how these issues impact Semtrio and how our activities, in turn, affect society and the environment.

Through this lens, we prioritized key sustainability topics and grouped them into three levels: High Materiality, Material, and Low Materiality. This structured approach enabled us to align our strategic priorities with areas of highest impact and opportunity, ensuring that our sustainability

efforts are focused, measurable, and forward-looking.

This analysis has provided greater strategic clarity and further strengthened the integration of ESG considerations across all aspects of our business. It not only strengthens our internal decision-making, but also lays the foundation for transparent, GRI-aligned sustainability reporting. By focusing on what truly matters, we continue to drive meaningful progress toward our sustainability goals—today and into the future.

High Materiality
Business Continuity
Client Satisfaction and Complaint Mechanism
Technology and Innovation
Career Management
Material
Data Security
Business Ethics and Transparency
Climate Change
Excellence in Work Conditions
Diversity, Equity, and Inclusion (DEI)
Low Materiality
Client and Project Selection
Responsible and Sustainable Supply Chain Management
Water and Waste Management
Health, Safety and Well-Being



GOVERNANCE

GOVERNANCE

A. Business Ethics and Transparency

At Semtrio, we uphold ethical conduct and transparency as fundamental principles guiding our business practices. Our **Business Ethics Policy** applies to every member of the organization—regardless of their title or role—and is designed to protect employees’ legal rights while fostering an inclusive and respectful work environment. **Discrimination, bribery, corruption, or any unethical behavior is not tolerated under any circumstances.**

Our commitment is aligned with **Principle 10 of the UN Global Compact** we combat all forms of bribery, extortion, and corruption across all business activities. From the moment an employee joins our team, they are introduced to our **Code of Conduct and Ethics Policy**. We make sure everyone understands their responsibilities, the potential risks, and the consequences of non-compliance.

Awareness and training are key tools in building this ethical foundation. In 2024, 100% of our team received ethics training, a rate we plan to improve through continuous learning initiatives.

Semtrio’s approach to business is shaped by honesty, fairness, transparency, and responsibility. We embrace diversity and inclusivity, promote



safe and cooperative work environments, and encourage behavior aligned with our shared values.

These values are embedded in every interaction with team members, clients, partners, and society.

In line with our Code of Conduct, employees are also expected to represent Semtrio appropriately on digital platforms and social media. All communications—whether internal or external—should reflect our ethical values and respect confidentiality. Personal posts must not disclose sensitive information, harm our company’s reputation, or mislead stakeholders.

Employees are also accountable for protecting both tangible and intangible company assets—from intellectual property to financial and brand value.

Any employee communicating on behalf of Semtrio is expected to do so truthfully and responsibly, reinforcing our ethical stance and corporate reputation.

As a certified **B Corp**, we actively use the B Impact Assessment framework to strengthen our ethical standards and continually improve. Our ethical expectations extend to our stakeholders, and we maintain clear communication of these standards through our Code of Conduct and Ethics Policy.



1. Anti-Corruption

Semtrio has a strict zero-tolerance policy against bribery and corruption. Offering, accepting, or facilitating any form of bribery is explicitly prohibited.

Our policies also cover practices such as gift-giving and hospitality. While symbolic gestures are allowed within defined limits—\$50 for employees, \$100 for senior management (these limits have been established from the perspective of the Global Fight Against Bribery and Corruption)—they must never influence decision-making or undermine objectivity. All such actions must be disclosed and approved by management.

We require employees in critical roles such as procurement, sales, and accounting to receive specialized training to mitigate risks of unethical conduct. To strengthen oversight, internal audits focusing on ethical compliance are regularly conducted, particularly in procurement and buyer functions. These audits are supervised by the Board of Ethics to ensure that all transactions and processes comply with Business Ethics Policy.

Controls such as the four-eyes principle and separation of duties are systematically applied to increase transparency and reduce risks.

Any findings from these audits are reviewed and, where necessary, corrective actions are taken to improve internal safeguards.

Any suspicion of bribery or corruption activates our Board of Ethics, and investigations follow a transparent and prompt disciplinary process.

The Board, composed of the CEO, Climate Solutions Director, and Human Resources Executive, ensures that all cases are addressed with impartiality, integrity, and in alignment with our ethical standards.

We also remain vigilant against fraud, money laundering, and transactions of unknown origin. Financial operations are strictly monitored, and we prohibit business relationships with individuals or entities linked to illegal activity.

We ensure that all employees report suspicious activity, which is then handled with high-level scrutiny and confidentiality.

Conflict of interest is another critical focus. Employees must avoid situations where personal relationships might compromise their professional duties.

All potential conflicts must be reported to the Board of Ethics and are dealt with under strict ethical and legal standards. In our consulting processes, we regularly assess assignments to ensure independence and neutrality, and we mandate conflict of interest declarations across projects.

We also comply with all competition laws and actively work against anti-competitive practices. Fair competition is not just a legal obligation but a core part of our mission to build a transparent and trustworthy sector. Price manipulation, collusion, or

any behavior that undermines market integrity is not tolerated.

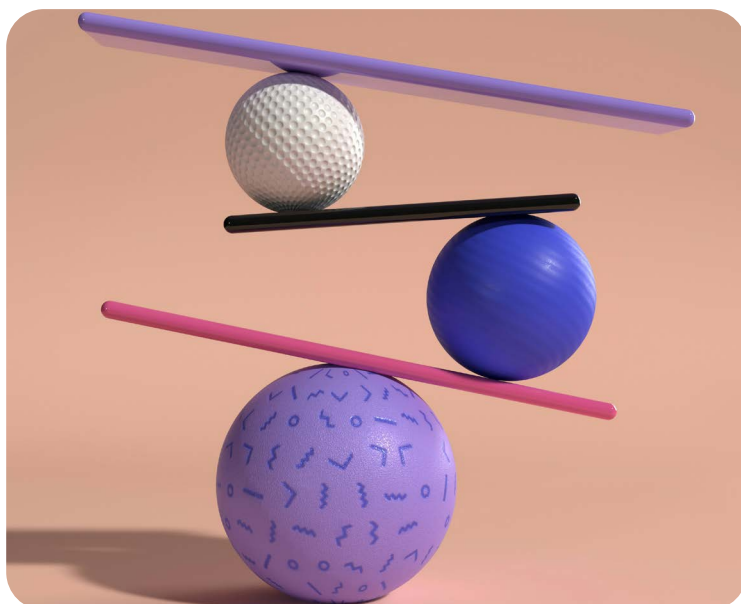
Semtrio ensures transparency in sponsorships and donations.

All contributions are reviewed to ensure they are ethical, lawful, and socially beneficial.

All interactions with public officials must be conducted transparently and with organizational knowledge.

To ensure proactive integrity management, Semtrio conducts periodic reviews of corruption-related risks across all critical business functions.

These assessments help us identify high-risk areas—such as procurement, client acquisition, and financial operations—and inform the development of targeted mitigation measures. Based on the outcomes, corrective actions such as additional internal control or training enhancements are implemented. Risk assessment findings are reviewed annually by the Board of Ethics and integrated into company-wide compliance updates.



2. Compliance

Our commitment to compliance is demonstrated through robust policies and adherence to both national and international standards. We align our operations with key global frameworks, including:

- UN Global Compact
- ISO 27001 – Information Security Management System
- ILO Declaration on Fundamental Principles and Rights at Work
- UN Universal Declaration of Human Rights
- UN Sustainable Development Goals
- UN Convention Against Corruption

Our information security practices are certified under ISO 27001. Sensitive company and client data are protected through advanced security protocols, access controls, and regular audits. Employees are trained to safeguard internal and external information and maintain confidentiality.

Semtrio ensures compliance with personal data protection laws (e.g., KVKK and GDPR). We implement transparent data governance policies, limit access to project-specific data, and carry out regular data security training and audits.

3. Notice of Violation

To protect our workplace from unethical conduct, Semtrio enforces a robust whistleblowing policy that ensures every employee's voice is heard safely and confidentially. Employees can report concerns anonymously through designated whistleblower channels, without fear of retaliation. Our open-door policy and regular feedback mechanisms ensure a culture of openness and accountability.

Whistleblower reports are investigated by the Whistleblowing and Disciplinary Boards, which act independently and objectively. All findings are compiled into detailed internal reports. If a violation is confirmed, appropriate corrective and preventive actions are taken to reinforce company policy and culture.

In 2024, there were zero reported and confirmed cases of bribery, and no whistleblower reports were filed.

Nonetheless, our procedures remain active and are reviewed annually or when needed to align with new regulations, risks, and organizational changes.

Our Whistleblowing Committee—consisting of the CEO, Sustainability Director, HR Executives, and legal counsel—is responsible for evaluating complaints, ensuring confidentiality, and protecting whistleblowers from any form of retaliation. They also conduct follow-ups and monitor performance indicators for improvement.

Anyone can report concerns through our Ethics Hotline at **+90 216 807 02 48** or by email at **ethics@semtrio.com**. These channels are open not only to employees but also to suppliers and other stakeholders in our value chain.

We provide regular training to raise awareness about reporting mechanisms and ethical behavior. Topics covered include bribery, corruption, fraud, human rights, discrimination, occupational safety, information security breaches, and more. Each investigation is documented, handled with care, and escalated to authorities when necessary.

Our whistleblowing procedure includes the collection of evidence, witness testimony, and internal review. Final reports are shared with relevant parties, and necessary actions are implemented to prevent future occurrences.

The entire process is designed to be objective, legally compliant, and confidential.

Employees and stakeholders can report unethical, illegal, or inappropriate behavior related to, but not limited to, the following areas:

Unethical practices
Bribery and corruption
Money flows of unknown origin / money laundering
Conflicts of interest
Personal data breaches
Information security violations
Anti-competitive practices
Fraud and financial misconduct
Threats and intimidation
Forgery and falsification of documents
Child labor
Harassment, repression, and mobbing
Discrimination
Inhumane or abusive treatment
Human trafficking
Obstruction of freedom of association
Wages, working hours, and labor conditions
Occupational health and safety risks or violations
Stakeholder concerns regarding legal or ethical breaches

Risk Analysis and Continuous Improvement

At Semtrio, we perform regular risk assessments in critical operational areas to identify and mitigate potential ethical and compliance threats. These risk analyses help us take a proactive stance and reinforce our corporate resilience.

Key areas evaluated include:

1. Bribery and Misconduct in Client Relations

Risk:	The potential for unethical practices during client engagement could undermine legal obligations and stakeholder trust.
Actions:	We have implemented recurring anti-bribery awareness training, more frequent internal audits, and established open grievance channels for third parties.

2. Unfair Competition

Risk:	Violations of competition laws may lead to reputational damage, legal penalties, or financial loss.
Actions:	We have expanded the scope and frequency of competition law training, ensured inclusion of all employee groups, and introduced regular evaluation of training outcomes.

3. Misuse of Customer Data

Risk:	Improper handling of personal data could breach regulations like KVKK and GDPR, affecting client confidence.
Actions:	We maintain strong data governance, limit system access, and conduct ongoing information security training to build awareness.

4. Conflict of Interest in Consultancy Assignments

Risk:	Personal interests interfering with business integrity may lower service quality and damage client trust.
Actions:	We routinely review compliance with independence principles, require systematic conflict of interest declarations, and operate ethical violation reporting mechanisms.

5. Irregularities in Procurement and External Services

Risk:	Non-transparent invoicing or unethical conduct during procurement may result in legal and reputational consequences.
Actions:	Invoicing procedures undergo dual checks, external audits are performed regularly, and supplier selection is governed by clearly defined ethical standards.

These risk-driven measures are tracked through performance indicators and reviewed annually to ensure effective risk mitigation and ethical governance.

At Semtrio, we view ethical governance and regulatory compliance as strategic pillars that support sustainable value creation and long-term resilience.

We recognize that long-term success is built on trust, transparency, and accountability—both within our organization and across our stakeholder network. By embedding robust ethical standards, zero-tolerance anti-corruption policies, and a proactive compliance culture into every level of our operations, we aim to safeguard our reputation and uphold the values we stand for. Through continuous training, vigilant oversight, and an open feedback culture, we remain committed to strengthening our governance framework and contributing to a more responsible and sustainable business environment.



B. Technology and Innovation



Semtrio's Perspective on Technology and Innovation in Sustainability

At Semtrio, we recognize technology as a pivotal force in advancing climate leadership. We are committed to harnessing digital solutions to empower businesses with the right tools for the net-zero transition.

We combine digital solutions with our strategic approach to ensure that sustainability efforts are both efficient and effective. Understanding the unique needs, operations, risks, and opportunities of each company, we create tailored roadmaps and analyze the status quo to develop effective strategies and implement feasible solutions. By offering a comprehensive perspective, we ensure that our net-zero roadmap solutions are not only accurate but also able to be seamlessly integrated into business operations.

Beyond internal improvements, we help companies navigate external regulations and stakeholder expectations, ensuring they define clear strategies and advance with confidence. This proactive stance mitigates risks associated with regulatory changes and helps businesses maintain better control over their processes and stay ahead in a rapidly changing world. At Semtrio, we champion this forward-thinking approach,

believing that those who go beyond compliance to take proactive measurements today will be leading the charge tomorrow.



Global Regulatory Landscape & Recent Developments

As technology and sustainability converge, regulatory frameworks worldwide are evolving to require greater transparency, accountability, and action in carbon management. Key developments from 2023 and 2024 include:

- IFRS Sustainability Standards (IFRS S1 & S2) introduced global disclosure requirements for climate-related financial risks, establishing a universal baseline for corporate sustainability reporting.
- The European Union's Corporate Sustainability Reporting Directive (CSRD) has extended ESG reporting obligations beyond large corporations to include SMEs, enforcing stricter Scope 3 transparency and data reporting.
- SBTi's net-zero standard updates include strengthening Scope 3 emissions tracking and requiring businesses to set near-term decarbonization targets aligned with global climate goals.

- Due to the Carbon Border Adjustment Mechanism (CBAM), businesses importing goods into the EU must report embedded carbon emissions by 2026, driving demand for automated carbon footprint tracking and supply chain transparency.
- Global Reporting Initiative (GRI) is aligning with ISSB standards to ensure cross-border compatibility, while the TCFD's recommendations have been integrated into IFRS S2, pushing for deeper risk assessment and emissions accountability.





Semtrio's Innovative Response

In response to the evolving regulatory landscape, Semtrio has positioned itself as a leader in sustainability transformation, ensuring businesses remain compliant while advancing their net-zero goals.

Ambition to Action:

Accurate and timely emissions data is the foundation of effective decision-making. We streamline carbon accounting and reporting, reducing time spent on carbon management to enable businesses to focus on proactive decarbonization and real progress toward net zero.

Scalable & Accessible Solutions:

Sustainability shouldn't be a constraint—it should be a catalyst for innovation. That's why our solutions are designed for scalability, flexibility, and ease of integration, enabling organizations to embed sustainability into their operations seamlessly.

Driving Change Across the Supply Chain:

We help businesses foster collaboration, transparency, and accountability across their supply chains—ensuring that sustainability commitments translate into measurable action at every level. By engaging suppliers, partners, and stakeholders, we empower organizations to drive systemic change and achieve real, global emissions reductions.



The Evolution of Our Climate-Tech Solutions

Our sustainability efforts began with consultants—the pioneers who mapped the terrain of net zero with expertise and dedication. They provided invaluable insights and expertise, but their reliance on manual processes and bespoke solutions posed significant challenges.

As we realized our consultants were facing these challenges, we collaborated with Climateware to develop SaaS solutions that offer scalability and efficiency. These platforms automated the labor-intensive aspects of greenhouse gas (GHG) accounting, making sustainability efforts more accessible to a wider range of businesses. However, their one-size-fits-all approach often fell short in addressing unique business needs.

Recognizing these limitations, we embarked on a journey in partnership with Climateware to develop a more holistic, customizable solution—a platform capable of providing end-to-end carbon management services to transform corporate net-zero aspirations into achievable processes: Carbondeck.



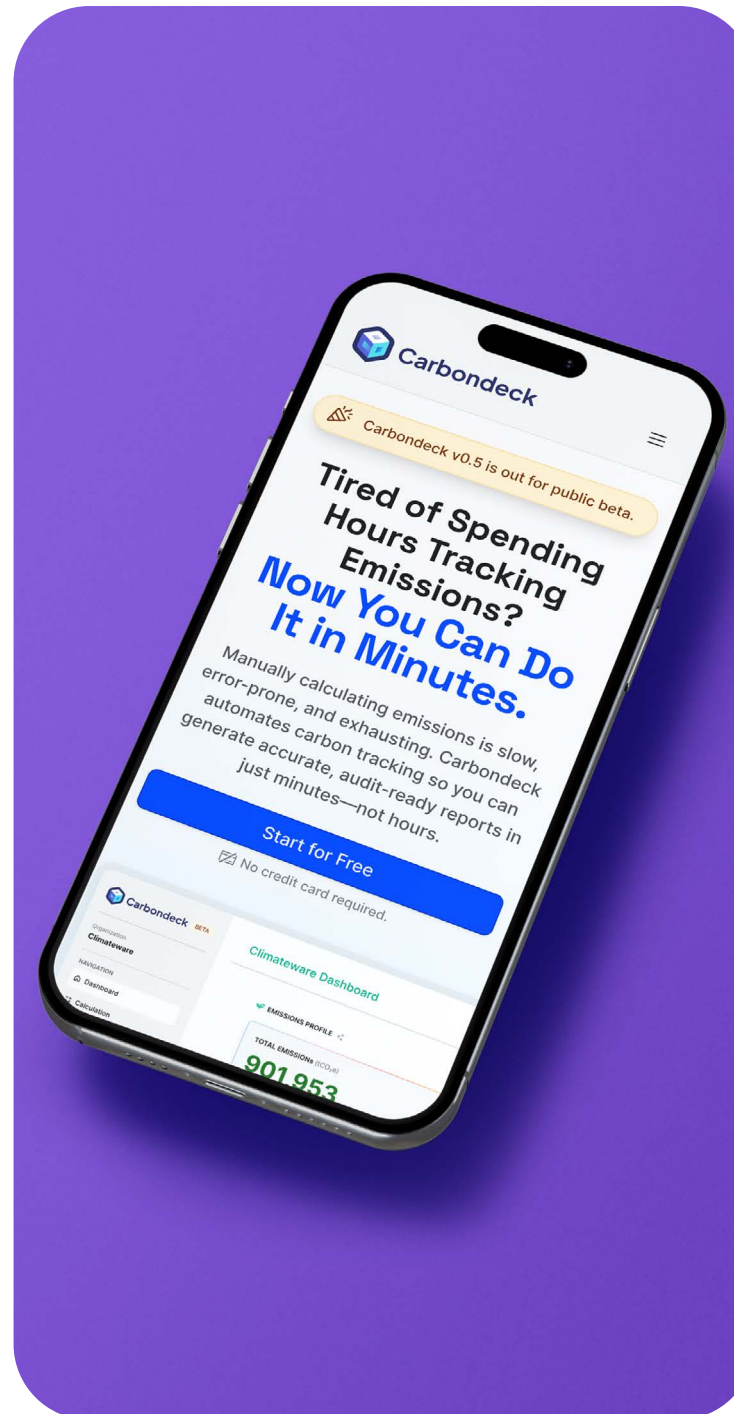
Carbondeck

Carbondeck is designed by Climateware to incorporate the strengths of its predecessors, ushering in a new era of digital carbon management. As businesses worldwide navigate increasing climate regulations and sustainability challenges, Carbondeck serves as a comprehensive platform that simplifies compliance, enhances reporting accuracy, and empowers companies to take proactive steps toward carbon reduction.

At its core, Carbondeck delivers comprehensive carbon accounting, automating Scope 1, 2, and 3 calculations to eliminate manual errors and accelerate sustainability reporting.

Designed for efficiency and adaptability, Carbondeck integrates supply chain and financial systems, enabling transparent and efficient data flow with bulk data upload options. The platform also features a marketplace for customized solutions. Built with enterprise-grade security and scalability, Carbondeck supports organizations of all sizes, from SMEs to multinational corporations, ensuring data privacy and compliance at scale.

More than just a carbon accounting tool, Carbondeck is a climate intelligence hub that streamlines the multi-step carbon management process on one platform. By leveraging automation and regulatory alignment, it makes sustainability accessible, measurable, and actionable—helping businesses transition from compliance to meaningful impact.



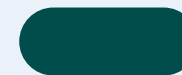
How Technology is Shaping the Future of Sustainability

The transition to a low-carbon economy is not just about meeting today's regulatory requirements—it is about future-proofing businesses in an era of rapid technological and environmental change. As climate disclosure frameworks and stakeholder expectations evolve, companies that integrate digital sustainability solutions early on will be better positioned to navigate the complexities of global markets.

The next phase of climate technologies will be characterized by greater automation, interoperability, and predictive capabilities.

Businesses that establish strong data infrastructures today will gain deeper insights into their emissions patterns, enabling proactive rather than reactive sustainability strategies. Companies embedding sustainability into their core operations through integrated platforms will be able to optimize efficiency, drive innovation, and mitigate financial and reputational risks associated with climate non-compliance.

Organizations that align their sustainability strategies with cutting-edge digital solutions will be more agile in adapting to future requirements. By leveraging technology, businesses can set themselves up for long-term resilience and leadership in the sustainable economy of tomorrow.



C. Data Security

Data security is a fundamental responsibility embedded in the way we operate as an organization. In an increasingly complex digital environment, the protection of sensitive information—including customer data, employee records, intellectual property, and business-critical documentation—is both a strategic imperative and an ethical obligation.

To meet this responsibility effectively, we approach information security systematically, through internationally recognized frameworks and measurable commitments. We operate in accordance with the **ISO 27001**-certified Information Security Management System (ISMS), which defines the standard for securing financial data, confidential business assets, and personal information. Within this framework, all information assets are categorized based on confidentiality, integrity, and availability. This structured classification system provides a foundation for identifying vulnerabilities, recognizing potential threats, measuring their frequency, and determining security requirements. As a result, risks can be assessed and managed effectively, and improvement opportunities can be systematically pursued.

Our ISMS policy outlines a comprehensive structure for information security, including the following principles.

Our information security policy is built on the following principles:



Risk Management

We define operational rules to manage risks and ensure they remain within acceptable levels through continuous monitoring and alignment with emerging technologies.



Legal & Regulatory Compliance:

We comply with all relevant laws, court orders, regulatory requirements, contractual obligations, and stakeholder responsibilities—locally and internationally.



Sustainability & Efficiency

We ensure long-term resilience of our security infrastructure while maintaining cost-effectiveness.



Culture & Awareness

We promote security awareness across the organization to enhance our reputation and foster collective responsibility.

Information security is deeply integrated into our organizational culture. It is a collective obligation shared across all levels of the organization. All employees are made aware that information security is a multi-dimensional subject that requires the integration of technology, policy, education, and behavior. To embed this awareness early on, we incorporate information security briefings and confidentiality agreements into employment contracts and onboarding programs.

In practice, we enforce strict data handling procedures. Customer data is accessible only to authorized personnel, and no sensitive information that may pose operational, reputational, or competitive risk is ever transferred externally through email or other unsecure communication tools. Our internal controls prevent unauthorized disclosure, and strict access rights are assigned based on operational necessity.

To reinforce this approach, our organization ensures the following measures are in place:

- ✓ All employees receive training on the secure handling of both internal and external information, along with confidentiality and data protection requirements.
- ✓ Information security awareness is maintained through continuous training, including regular refreshers on emerging threats.



- ✓ Employees report any suspicious activity or potential security breach to their manager or the IT Security Team immediately. Early detection minimizes the risk of damage.
- ✓ Safe internet and email usage is promoted, with a focus on phishing and digital fraud awareness.
- ✓ In remote work or BYOD (Bring Your Own Device) settings, employees are responsible for securing personal devices and following all protocols for protecting company data.

Our vigilant and preventive approach has proven effective. The organization recorded zero confirmed information security incidents during both 2023 and 2024. This is the result of a culture of vigilance, active participation, and strict compliance with policies and controls.

Our commitment to data security also includes specific operational requirements, such as:

- ✓ Conducting comprehensive risk analyses regarding unauthorized access, incident response, and document control processes.
- ✓ Ensuring that employees using third-party IT systems—such as those of customers, suppliers, or distributors—review and comply with the relevant external security policies. In cases where this is not possible, staff are expected to act in good faith and in line with the general provisions of our internal policies.

Should a security incident occur, our incident notification policy outlines a clear and structured

response process. Any employee who notices or suspects a breach is required to notify the IT Security Team using any available communication channel, including email. The ISMS team convenes immediately to evaluate the situation and take corrective action.

The incident is formally documented using an incident form or Decision Form (DF) and monitored until resolution. Our Incident Response Plan (IRP) also includes post-incident evaluation and communication with affected stakeholders when applicable, to ensure transparency and continuous improvement.

To further strengthen this process, we have implemented a secure and confidential whistleblower mechanism that enables employees and stakeholders to report suspected data breaches, misconduct, or unethical behavior without fear of retaliation. This mechanism supports our commitment to transparency, integrity, and proactive risk management.

**Reports can be submitted
through our ethics hotline at
+90 216 807 02 48 or via
email at ethics@semtrio.com**

All reports are treated with strict confidentiality and reviewed by the disciplinary committee or relevant security team, depending on the nature of the issue.

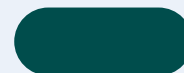
This mechanism complements our broader monitoring and auditing efforts by ensuring potential risks are addressed not only through systems and controls, but also through proactive reporting. Monitoring and auditing form the backbone of our security operations. All user activities, exceptions, errors, and information security events are logged in our systems.

Access to log files is strictly limited and defined in an authorized access list. To ensure legal compliance, all logs—including those required under Law No. 5651—are retained in a secure log analyzer system. Time synchronization is maintained via a centralized time server, ensuring accurate and traceable records.

Our document control practices are equally robust. All documented information is listed in a centralized document master list and retained for the legally mandated duration.

At the end of this period, records are securely destroyed using appropriate methods based on their storage format. Paper documents are shredded or rendered unreadable before recycling. Digital files are permanently deleted, and, where necessary, physical storage devices such as HDDs are physically destroyed.

Access to our information systems is strictly regulated. Only authorized personnel may access the organization's systems.



Unless explicitly authorized by senior management, systems are not to be transferred or used by customers, visitors, or unauthorized employees.

Within internal platforms such as SharePoint, access restrictions are enforced to ensure that only individuals assigned to a specific project can view related documentation or data.

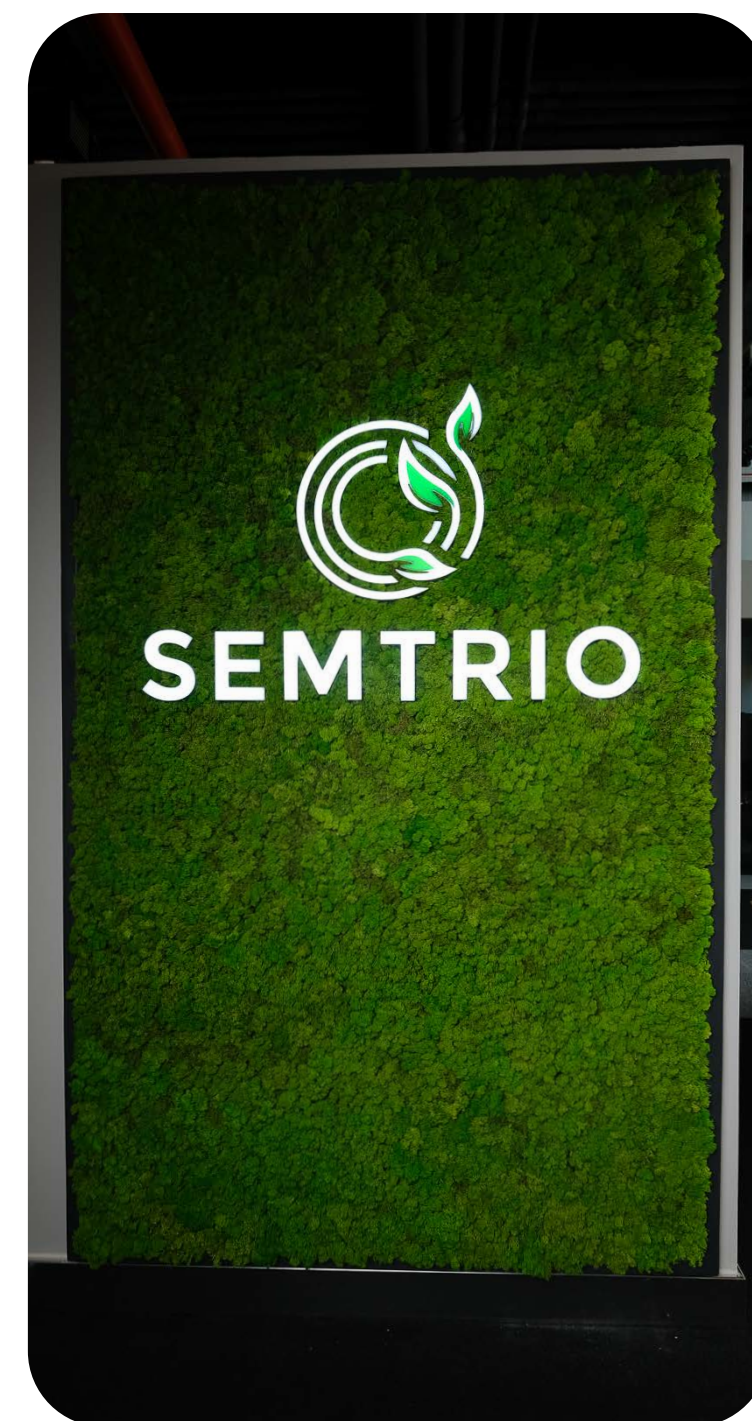
Our legal and ethical obligations around data protection are reinforced contractually. Confidentiality clauses are incorporated into KVKK (Personal Data Protection Law) forms and customer agreements.

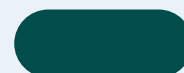
Customers are provided with clear information on the type of data collected, its intended use, storage duration, and the parties with whom it may be shared.

These details are outlined in customer agreements and consent is obtained in compliance with the Personal Data Protection Law (KVKK). Upon hiring, employees are also required to sign a dedicated data security agreement outlining their individual responsibilities and the consequences of non-compliance.

Ultimately, information security is a matter of integrity. The principle of “Personal Data Protection and Confidentiality” is not merely a guideline but a commitment embedded in every stage of data collection, processing, and storage. Transparent data management, legal compliance, and clearly defined confidentiality boundaries are considered essential ethical duties.

By combining technical safeguards, regulatory compliance, detailed procedures, and a company-wide culture of responsibility, we maintain the highest standards of information security. **Our commitment to protecting the data entrusted to us is unwavering—and central to our operational excellence.**



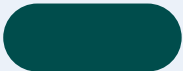


D. Business Continuity

At Semtrio, business continuity is a strategic priority built into our everyday work, helping us stay prepared and operate smoothly under all conditions. Recognizing the critical nature of continuity, especially in the consulting sector where project delivery and client trust are paramount, we approach it as a fundamental pillar of our organizational resilience and service excellence.

A key component of this strategy is the implementation and certification of the **ISO 27001 Information Security Management System (ISMS)**. This system ensures that we manage information in an ethical, secure, and transparent manner. By doing so, we align closely with the principles of our **B Corp certification**, which underscores our commitment to accountability, integrity, and sustainable value creation across all business functions.

Semtrio operates in a field where clients depend on uninterrupted service delivery, and our focus on business continuity enables us to consistently deliver high-quality projects while maintaining strong customer satisfaction. Looking forward, we will continue to invest in our infrastructure, information systems, and human capital to ensure that Semtrio remains a reliable partner in times of change, challenge, or disruption. Business continuity is not just about preventing interruptions, it is about building a resilient, agile, trustworthy organization capable of delivering long-term value in a dynamic world.



Internal and External Expectations

Our goal is to achieve corporate excellence by delivering fast, efficient, and high-quality service, while also offering reliable products through continuous development of our

technological and physical infrastructure. We aim to strengthen our organization's reputation by enhancing information security and fully meeting the expectations of all relevant parties

regarding business continuity. To support this, we actively assess and evaluate the needs and expectations of those we serve.

Internal Expectations	Impact
Experienced, Dedicated Employee Staff Availability and Stability of the Workforce	Employees start their roles after meeting specific qualifications and educational requirements. At the same time, low employee turnover contributes positively to overall engagement, fostering stronger participation in the management system.
Management Stability and Organizational Structure	The stability of leadership, combined with active involvement from all employees, strengthens both the organizational structure and the effectiveness of the management system.
Organization Culture and Informatics Existence of Infrastructure	While the organization has not faced any major information security incidents, fostering a strong culture of information security will enhance the overall workplace environment and support the protection of customer data and ownership. Moreover, the presence of robust IT infrastructure, along with reliable software and hardware that meet customer expectations and operational needs, plays a key role in establishing, maintaining, and continuously improving the Information Security Management System.
Campus Structure	The organization's location within Technopark, a secure technopark facility, enhances physical security and supports the safe delivery of its services.
Monitoring Compliance with Laws and Contracts	Regulatory obligations that the organization is required to help mitigate risk. The development of infrastructure and facilities in line with Laws 5651 and 6698, along with consistent oversight to ensure compliance with legal and regulatory standards, further supports this risk reduction. Non-compliance with customers or legal requirements could lead to serious negative consequences. However, the organization's strong culture of adherence to contractual obligations minimizes this risk. This culture is clearly reflected in the long-standing presence of the Information Security Management team, demonstrating a sustained commitment to compliance and security.

External Expectations	Impact
Infrastructure Services	Both our region and the tTechnopark offer the essential infrastructure needed to support the company's operations and growth.
Expectations of Legal and Regulatory Bodies	In both current and future areas of work and research, meeting the standards set by various governmental bodies is essential. The organization recognizes and complies with the general legal requirements related to its operations. Some of these obligations are enforced through formal contracts, and intellectual property rights are carefully respected. Efforts have also been made to align with the Personal Data Protection Law No. 6698 (KVKK), ensuring proper handling of personal data. Additionally, compliance with Law No. 5651 ensures that internet access records are properly maintained. The responsibility for maintaining ongoing operational records required by the Ministry falls under the management of Technopark.
Customer Expectations	Customer expectations are effectively managed through well-defined contracts. The organization benefits from a strong culture of honoring agreements, which reinforces trust and ensures consistent, reliable service delivery.



Human Resources Management

At Semtrio, we recognize that our employees are our greatest strength. We are fully aware that sustaining employee loyalty is crucial not only for operational efficiency but also for the long-term success of our organization. With this in mind, we prioritize **open, transparent, and consistent communication with all members of our team**. We view this ongoing dialogue as a key element in building trust and reinforcing our values across the company.

In all matters relating to our workforce, we are firmly committed to upholding the **principles of equality, diversity, and inclusion**. These principles are not just theoretical ideals but foundational aspects of how we engage with, support, and empower every employee. We believe that a fair and respectful work environment, where differences are embraced and everyone feels a sense of belonging, is essential for creating a productive and positive organizational culture.

Professional development is another core focus of our human resources strategy. We strive to support each employee in achieving their full potential by encouraging continuous learning and skills growth. By maintaining high standards of employee well-being, we aim to provide an environment where people are motivated, supported, and equipped to succeed.

At the heart of our approach lies effective **human resources management**. Through strategic

planning and consistent practices, we aim to create a work environment that is both supportive and conducive to growth. Our goal is to ensure that all employees feel recognized, respected, and aligned with the broader mission of the organization.

Ultimately, we believe that a thriving workplace is built on mutual respect, shared purpose, and strong human relationships. These values guide all of our HR-related decisions and shape the culture we continue to nurture at Semtrio.



Organization and Digital Project Management

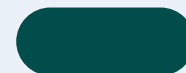
At Semtrio, we recognize that efficient organizational structure and robust digital project management are fundamental to delivering high-quality services and ensuring customer satisfaction. Our commitment to digital transformation is closely aligned with our sustainability goals and our aim to operate transparently, efficiently, and securely.

A key component of our digital infrastructure is the **CRM (Customer Relationship Management)** system, used by the customer management team to track sales, document client interactions,

and streamline communication. This digital tool allows for the generation of **monthly reports and detailed analyses** on a variety of metrics such as sectoral trends, customer retention rates, and resource efficiency. By leveraging these insights, the team can make informed decisions that contribute to both operational performance and long-term strategic goals.

Digital project management is further supported by our **Information Security Management System**, certified under **ISO 27001**. This internationally recognized standard underlines our commitment to the ethical and secure handling of information. By integrating this system into our workflows, we ensure that all digital processes are not only efficient but also aligned with the best practices of information security. **The absence of major information security incidents to date** reflects the strength of our internal culture and our proactive approach to risk management.

Our efforts in digital project management are closely monitored and reviewed through continuous evaluation and reporting mechanisms, ensuring alignment with internal performance standards and external stakeholder expectations. Together, these practices reinforce our ability to operate with resilience, transparency, and a strong client focus.



E. Client Satisfaction and Complaint Mechanism

At Semtrio, we view client satisfaction not merely as a feedback metric, but as a strategic tool to evaluate the quality and impact of our services. In line with this understanding, we have integrated **customer satisfaction measurement** into our core business processes since 2021, and we continue to monitor it regularly as part of our commitment to excellence.

Our customer management team plays a central role in this process, ensuring that satisfaction levels are consistently tracked, and that service quality remains high. After the completion of each project, **satisfaction evaluation surveys** are sent to the relevant stakeholders who were directly involved in overseeing the process. The responses from these surveys are reviewed monthly by the customer management team, and any areas of concern are proactively addressed.

If negative feedback is received, it is promptly escalated to the management team, and the specific concerns raised by the client are carefully reviewed. **Thanks to our agile approach and commitment to continuous improvement, most issues are resolved within 48 hours, ensuring swift and effective response and maintaining trust throughout the relationship.**

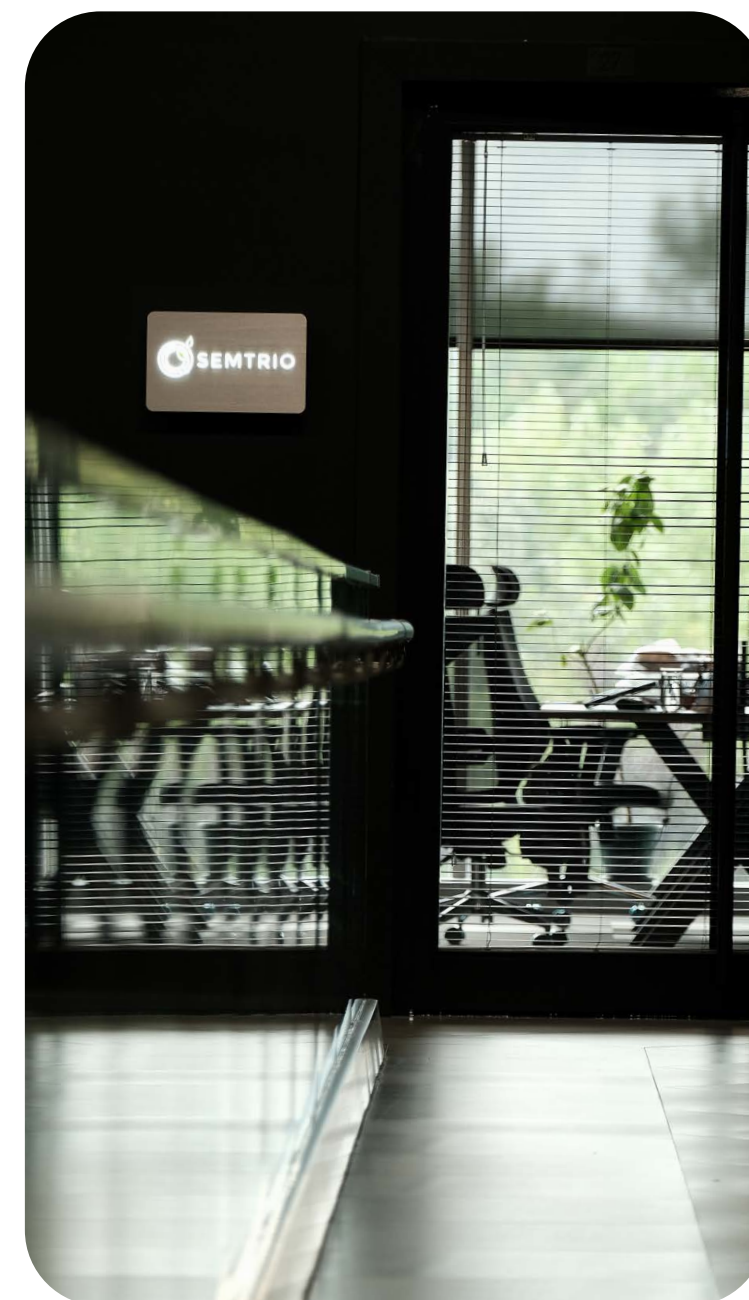
We believe that identifying the problem is the first and most essential step toward finding a solution. For this reason, we have created a dedicated **complaint form**, encouraging clients to clearly express their concerns in writing. This helps us

systematically track issues, follow up on them, and develop long-term solutions.

Open and accessible communication has always been a cornerstone of Semtrio's business philosophy, both internally and externally. Clients can easily reach out to us via phone or email, which reflects our approachable, humble, and solution-oriented attitude. This openness not only facilitates quicker problem-solving but also strengthens long-term client relationships.

As of 2024, our commitment to quality and responsiveness has been reflected in an 88% satisfaction rate in satisfaction evaluation surveys.

This figure not only illustrates our current success but also symbolizes our dedication to maintaining a consistent and sustainable standard of excellence in all our client engagements.



F. Client and Project Selection

At Semtrio, our approach to client and project selection is guided by our commitment to sustainability, ethical responsibility, and long-term partnership. In line with our **Sustainable Procurement Policy** and our **Supplier & Customer Code of Conduct**, we apply a comprehensive evaluation process to ensure that our clients, suppliers, and business partners share our values and sustainability goals.

We prioritize collaboration with organizations that:



Align with our core principles, such as respect for human rights, fair labor practices, environmental stewardship, and ethical business conduct.



Demonstrate environmental and social awareness, with structured sustainability strategies, certifications (e.g., ISO 14001, ISO 45001, B-Corp), and ongoing performance improvements.



Comply with international standards including the UN Global Compact, ILO Conventions, and the UN Sustainable Development Goals.



Promote diversity and inclusion within their operations, including initiatives that support women-owned businesses, minority-led organizations, and underrepresented communities.



Have no record of or association with issues for which we have zero tolerance, such as child labor, harassment, discrimination, forced labor, or irreversible environmental damage.

All potential customers and partners go through an evaluation process under our Sustainable Procurement and Responsible Purchasing framework. Projects are only initiated after confirming alignment with our policies and standards. We maintain the right to suspend or terminate relationships in the case of violations that contradict our sustainability principles.

Moreover, Semtrio actively monitors clients' environmental and social practices through internal tools and third-party assessments. We also provide preferential service terms and discounts to clients who demonstrate exceptional sustainability performance and commit to continuous improvement.

In 2024, we realized our goal of integrating the Semtrio Supplier & Customer Code of Conduct into 100% of our business agreements and aim to increase on-site audits.



G. Responsible and Sustainable Supply Chain Management

As we pursue our sustainable growth strategy, we actively collaborate with both internal and external stakeholders in managing sustainability and its key components. Our goal is to raise awareness around sustainability and reinforce our efforts through environmentally conscious practices. This vision is operationalized through clear policies and principles that guide how we engage with suppliers.

In line with Semtrio's **Sustainable Procurement Policy** and our **Supplier & Customer Code of Conduct**, sustainability is not merely a selection criterion but a foundational principle in how we manage our supplier relationships. We aim to establish long-term, fair, and transparent partnerships with companies that uphold high standards in environmental, social, and governance performance.

To ensure our internal teams are fully equipped to apply these standards consistently, we invest heavily in training and capacity building. We aim to provide training on sustainable procurement to the members of Semtrio's procurement team and relevant departments, ensuring up-to-date knowledge of environmental and social criteria in purchasing decisions. These criteria are integral parts of the supplier evaluation and selection processes.

In support of this framework, Semtrio also provides clients with comprehensive Sustainable Procurement Training. This program highlights the

economic, environmental, and social dimensions of procurement, covering topics such as ethical sourcing, diversity, equity, and inclusion in the workforce, ISO 20400 compliance, and sustainable performance metrics like carbon reduction and labor rights alignment. It also emphasizes transparency, traceability, and supplier collaboration.

We are committed to extending sustainability expectations across our supplier base. As per our Sustainable Procurement Policy, we aim to provide human rights and labor rights training to 100% of our suppliers by 2026, while continuing to build internal awareness through regular staff development initiatives.

To complement these efforts, we have established robust monitoring mechanisms, including regular reviews of Service Level Agreements (SLAs), confidentiality clauses, and supplier risk in accordance with Semtrio's Sustainable Procurement Policy. Supplier selection and monitoring are conducted through a rigorous, criteria-based system. To qualify as a potential supplier, a company must achieve a minimum score of 50 out of 100 in our **Supplier Evaluation Form**.

The supplier evaluation form is a standardized ESG questionnaire that covers labor practices, environmental performance, health & safety, and ethical conduct. The minimum passing score is 50/100, and results determine follow-up

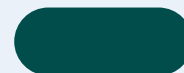
actions such as improvement plans or contract suspension.

Our Supply Chain Risk Assessment Matrix evaluates suppliers based on severity and likelihood of adverse ESG impacts. Factors include country risk, sector exposure, and previous audit results. Based on this, Semtrio categorizes suppliers into low, medium, and high risk tiers and tailors mitigation strategies accordingly.

Semtrio conducts announced and unannounced on-site audits based on predefined ESG checklists. Audit reports identify non-conformances and corrective actions. A follow-up audit ensures closure of major findings.

Suppliers in use are reviewed annually. Those scoring below 70 must submit an improvement plan, while scores below 50 results in termination of collaboration. SLA compliance accounts for 50 of the total 100 points. In tandem with these systems, we identify and mitigate risk through targeted supply chain analysis. Our **"Supply Risk Analysis Report"** categorizes supplier risks and provides corresponding mitigation strategies to maintain business continuity and reinforce project success.

We emphasize inclusive procurement by prioritizing women-owned businesses, minority-led enterprises, and companies promoting workforce diversity, as outlined in our Sustainable



Procurement Policy. Suppliers are classified based on ownership (women-led, minority-owned) in our internal database. We proactively engage such businesses during supplier sourcing and aim to publish inclusivity metrics annually. We also favor local sourcing to strengthen regional economies and reduce logistics-related emissions.

We hold our suppliers to the highest standards of **ethical and responsible conduct**. In accordance with our Code of Conduct, we enforce zero tolerance for violations such as child labor, forced labor, discrimination, harassment, or environmental harm.

In such cases, Semtrio reserves the right to suspend or terminate business relationships until corrective action is taken.

Suppliers are contractually required to accept ESG provisions, including a termination clause in cases of non-compliance. These are embedded into all contractual templates, and Semtrio has implemented a standard legal process to enforce these clauses through its Legal and Compliance Team.

We expect suppliers to:

- Uphold international human rights and labor standards (ILO, UN SDGs)
- Guarantee ethical work environments and fair wages

- Promote diversity, equal opportunity, and non-discrimination
- Ensure occupational health and safety through training and risk assessments
- Prevent corruption, bribery, money laundering, and data misuse

We support these standards with strong enforcement tools and transparent reporting. A confidential Ethics Hotline and **whistleblower mechanism** is available to all stakeholders, allowing anonymous reporting without retaliation.

Our environmental expectations extend beyond compliance, instead focusing on long-term transformation. **We support suppliers in reducing Scope 3 emissions, adopting zero waste principles, managing resources responsibly, and complying with environmental regulations.**

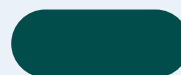
Suppliers are encouraged to implement environmental management systems, use eco-labeled products, minimize waste, switch to renewable energy, and adopt circular production models. Special attention is given to forest and biodiversity protection in resource-intensive sectors like paper and packaging.

Sustainable procurement KPIs are integrated into annual performance reviews of procurement team members, including supplier ESG compliance rate, inclusiveness of sourced vendors, and training completion rates.

We have adopted internal purchasing guidelines requiring all stationery, printing materials, and office equipment to meet FSC or equivalent certifications. All procurement requests are filtered through this internal checklist.

In line with this commitment, we prioritize working with brands that demonstrate strong sustainability practices, particularly in our office procurement processes. **By 2025, we aim to source at least 90% of our office equipment and supplies from FSC-certified providers, promoting responsible forest management.**

We offer preferential pricing to customers and partners with strong sustainability credentials, including those certified under ISO 14001, ISO 45001, B Corp.



To strengthen our practices, we have set clear performance indicators and achieved key milestones in 2024.

All targeted suppliers signed the Supplier Code of Conduct and operate under contracts with ESG clauses. **100% were assessed through CSR evaluations,** and **10% received on-site audits. All internal buyers received sustainability training.**

Additionally, **72% of our suppliers were local, and 2% were women-owned.** No audited suppliers were engaged in corrective action as of 2024.

In 2025, we aim to build on these results.

Our targets include 100% adherence to ESG requirements, full CSR assessment coverage, **increasing on-site audit participation to 25%,** and **engaging at least 10% of audited suppliers in corrective or capacity-building initiatives.**

We also plan to **expand training and enhance supplier diversity,** with a focus on women-owned and local businesses.

All of these practices are anchored in our broader goal of systemic, collaborative transformation. By aligning with both our Sustainable Procurement

Policy and Code of Conduct, we aim to lead a value chain built on ethics, transparency, and shared long-term goals.



**NET ZERO
WORLD**

NET ZERO WORLD

Our primary objective is to contribute to sustainable development by helping limit global warming to below 1.5°C. We understand that decarbonization is essential for ensuring a livable future. With this awareness, we offer strategic guidance to our clients using the **Science-Based Targets (SBT)** framework, supporting them in setting and achieving meaningful climate goals.

At Semtrio, we create innovative products and services designed to help our customers measure and minimize their environmental footprints, guided by an inclusive approach that considers both our stakeholders and the natural world. Aware of our responsibility as a service provider, we strive to lead by example. We regularly monitor and calculate our own greenhouse gas emissions, maintaining a strong focus on our impact in the context of the global climate crisis. Key areas such as emissions, energy use, water consumption, and waste management are central to how we assess our corporate performance, and these issues are actively addressed at the highest levels of our organization.



A. Climate Change

The accelerating climate crisis and the growing scarcity of natural resources have placed environmental responsibility at the center of global

priorities. At Semtrio, we see sustainability not as a trend, but as a fundamental responsibility and a catalyst for innovation across industries. Our solutions, rooted in science and technology, create value across sectoral value chains while safeguarding the natural capital upon which we all depend.

Guided by our Net Zero 2030 ambition, Semtrio's sustainability journey is grounded in data transparency, emissions accountability, and technological leadership. In 2024, we continued to measure and disclose our environmental impacts using **Carbondeck**, our proprietary carbon management platform aligned with international standards.

Emission (ton CO ₂ e)	2023	2024
Scope 1	7.60	7.29
Scope 2	3.03	4.94
Scope 3	36.85	29.96

Energy Consumption (kWh)	2023	2024
Total energy consumption	8.166	12.263

These insights guide the evolution of our emissions reduction strategy and form the basis of our broader energy transformation roadmap.

In 2024, we achieved an 18.7% reduction in Scope 3 emissions compared to the previous year, driven by a combination of digitalization efforts, minimized business travel, and operational efficiency improvements.

We monitor emissions across all Semtrio operations, including on-site client activities, hybrid working models, and outsourced services, ensuring full value chain transparency.

Looking ahead, we aim to further reduce Scope 3 emissions by increasing our reliance on local suppliers and service providers. This localized procurement strategy is expected to lower transportation-related emissions while strengthening our commitment to responsible sourcing.

Embedding Sustainability in Culture

While delivering sustainability and green tech solutions across industries, we continue to strengthen our internal capabilities. As outlined in our Environmental Policy, we focus on operational energy efficiency by:

- Upgrading to energy-efficient LED lighting,
- Installing advanced insulation systems,

- Replacing outdated equipment with high-efficiency alternatives,
- Deploying smart water fixtures such as sensor faucets,
- Implementing low-impact HVAC technologies.

We also recognize the importance of sustainable mobility. For this reason, we reduce travel-related emissions by encouraging shared transport options and prioritizing virtual meetings over physical visits.

All these efforts are reviewed regularly by our Environmental Sustainability Committee, established as part of the governance framework defined in our Environmental Policy, to ensure continuous alignment with legal regulations, stakeholder expectations, and global best practices.

Semtrio recognizes that organizational culture plays a critical role in achieving environmental goals. As part of our internal strategy, we provide employees with structured environmental training.

The training explores both global and local aspects of climate change, alongside the evolution of environmental thinking. Interactive sessions encourage employees to adopt environmentally friendly behaviors in daily life, such as reducing plastic use, supporting local food systems, and choosing low-emission transportation.

Building on this foundation, Semtrio also provides tailored workshops for its consultants to deepen their understanding of the environmental impacts embedded in sustainability projects. These sessions incorporate real-life best practices from Semtrio's client portfolio—ranging from low-carbon transition strategies and energy efficiency initiatives to circular economy and sustainable procurement projects. By showcasing how environmental targets are translated into measurable actions across industries, these trainings empower consultants to apply this knowledge in their advisory work. This not only enhances the environmental literacy of our team but also ensures that our consultancy services contribute meaningfully to positive environmental outcomes for our clients.

Enabling Clients Through Knowledge & Technology

We extend the reach of our sustainability goals through partnerships with clients across diverse industries. Each project begins with customized training sessions, tailored to sectoral needs, ensuring that every stakeholder starts with a shared understanding of sustainability fundamentals. This approach reflects our belief, stated clearly in our Environmental Policy, that education is a key enabler of systemic change.

We work with businesses across various industries, especially in the finance and real sectors, to accelerate their transition to a low-carbon economy.

Our consultancy efforts are complemented by Carboneck, our proprietary software that helps organizations measure, monitor, and optimize their environmental performance.

This integrated approach enables companies to not only meet compliance requirements but also to identify opportunities emerging from the climate crisis and strengthen long-term resilience.

To complement our climate consultancy work, we also offer ESG assessments that evaluate companies' performance across environmental, social, and governance indicators.

This helps our clients strengthen stakeholder trust, improve transparency, and align more effectively with global sustainability standards.

We believe that meaningful environmental change requires shared responsibility among businesses, governments, and communities. Semtrio is committed to playing its part, not only by improving our own operations, but by helping others transition to a more sustainable, balanced, and resilient future. **With our Environmental Policy as our guide, we are committed to creating measurable impact today, while empowering others to build a resilient, low-carbon tomorrow.**

1. Carbon Footprint

We are committed to reducing the greenhouse gas emissions generated by our operations. All calculations are performed using internationally recognized methodologies to ensure precision and alignment with global standards. These methods guide our emission reduction targets and enable us to implement impactful, data-driven actions.

Our approach includes low-emission operational practices such as:

- Operating in a shared office space with communal resources,
- Providing electric vehicle (EV) charging stations,
- Using company shuttles from central pickup points to reduce individual commutes,
- Maintaining a remote work model to limit daily travel-related emissions,
- Conducting most client meetings virtually.

We use **ENERGY STAR®** certified computers, monitors, and devices to reduce energy use across our digital infrastructure. These energy-efficient tools support lower consumption without compromising performance.

Additionally, our IT and office equipment are regularly repaired, refurbished, and shared across teams, aligning with circular economic principles. An internal platform facilitates the exchange of office materials like monitors, helping reduce waste and avoid unnecessary purchases. To further limit material use, we rely on a fully digital filing system. Printing is only permitted with prior

approval, reinforcing mindful consumption and minimizing paper use.

Our Environmental Policy outlines our climate strategy priorities, such as the intended future use of renewable energy, process optimization, and verified offsetting practices. We regularly train our employees on emission reduction techniques, carbon literacy, and climate action tools, encouraging responsible behaviors across daily operations.

We also work closely with suppliers and business partners to ensure they adopt similarly responsible practices. By integrating our sustainability expectations into supplier relationships, we promote a shared commitment to climate-conscious operations across our value chain.

We prioritize products with ECOLABEL certifications in all stationery and kitchen supply purchases, ensuring low-impact consumption across their lifecycle. Our coffee is also sourced from certified sustainable producers, supporting ethical and environmentally conscious supply chains.

Carbon Offsetting & Net Zero Strategy

Since our founding, we have proudly maintained carbon neutrality by offsetting emissions from all operational activities, including travel, site visits (both by land and air), and remote work-related impacts.

Our carbon offsetting strategy is managed through Co₂nsensus, and is closely aligned with our Net Zero 2030 goals, reflecting our broader climate responsibility as a certified B Corp.

Our offset portfolio includes projects that deliver real, verifiable, and measurable contributions to sustainable development. We only invest in offsets listed under internationally recognized platforms such as the **Gold Standard Registry**, which guarantees quality, and the **Verra Registry**, which ensures transparency and traceability of each supported project.

Beyond simply offsetting, we take a proactive approach toward emissions reduction. We have partnered with the Net-Zero Company to:

- Implement an internal carbon pricing mechanism,
- Facilitate carbon credit trading, and
- Define clear, actionable steps toward achieving full net-zero status.

This partnership strengthens our roadmap with added market-based tools and accountability, embedding climate action into our operational and strategic decision-making processes.

B. Water and Waste Management

At Semtrio, we view water as a critical natural resource, deeply intertwined with climate change, public health, and ecosystem resilience. Recognizing the urgency of water scarcity and pollution, we have taken concrete steps to monitor and reduce our water usage.

In 2024, our per capita water consumption decreased by 16% compared to the previous year, falling from 173.28 m³/person to 145.92 m³/person. This reduction was made possible through targeted efficiency measures, including the use of sensor faucets and routine monitoring via Carboneck, our integrated sustainability performance platform.

Water Consumption (m ³ /person)	2023	2024
Water consumption per capita	173.28	145.92

In line with our Environmental Policy, we provide employees with regular training on water-saving practices and set measurable annual goals to ensure continuous improvement. We also align our actions with international frameworks such as the Alliance for Water Stewardship (AWS), reinforcing our commitment to responsible water use.

Building on our approach to water conservation, we place equal emphasis on waste management,

another critical environmental concern. Our efforts are grounded in the principles of our Zero Waste 2030 roadmap, which aims to eliminate waste at the source and promote circular practices.

In 2024, we reduced our non-hazardous waste from 939 kg to 791 kg. Recovered waste totaled 680 kg. These figures are monitored through Carboneck, ensuring consistent reporting and alignment with our environmental goals.

Waste Amount (kg)	2023	2024
Total weight of hazardous waste	0	0
Total weight of non-hazardous waste	939	791
Total weight of waste recovered	807	680

Our waste management system is guided by the principles outlined in our Environmental Policy, which include:

- Installing recycling stations throughout office areas
- Promoting centralized waste collection by removing individual desk bins

- Monitoring waste separation and disposal processes
- Educating employees on the safe handling of both hazardous and non-hazardous waste

The policy also extends to remote working arrangements, ensuring that employees maintain the same level of environmental responsibility regardless of location.

In line with our commitment to circularity, we extend the lifespan of IT equipment, reduce reliance on single-use materials, and ensure that obsolete electronic devices are recycled through certified partners.

Waste collection is closely monitored in collaboration with BUDOTEK, the facility where we operate, to ensure proper separation and adherence to established procedures.

These efforts are supported through green purchasing practices. Employees are encouraged to make environmentally conscious procurement decisions, with a focus on minimizing supply chain impacts. **As outlined in the Environmental Policy, we promote the use of bio-based and eco-friendly materials and apply responsible sourcing standards across all purchasing activities.**

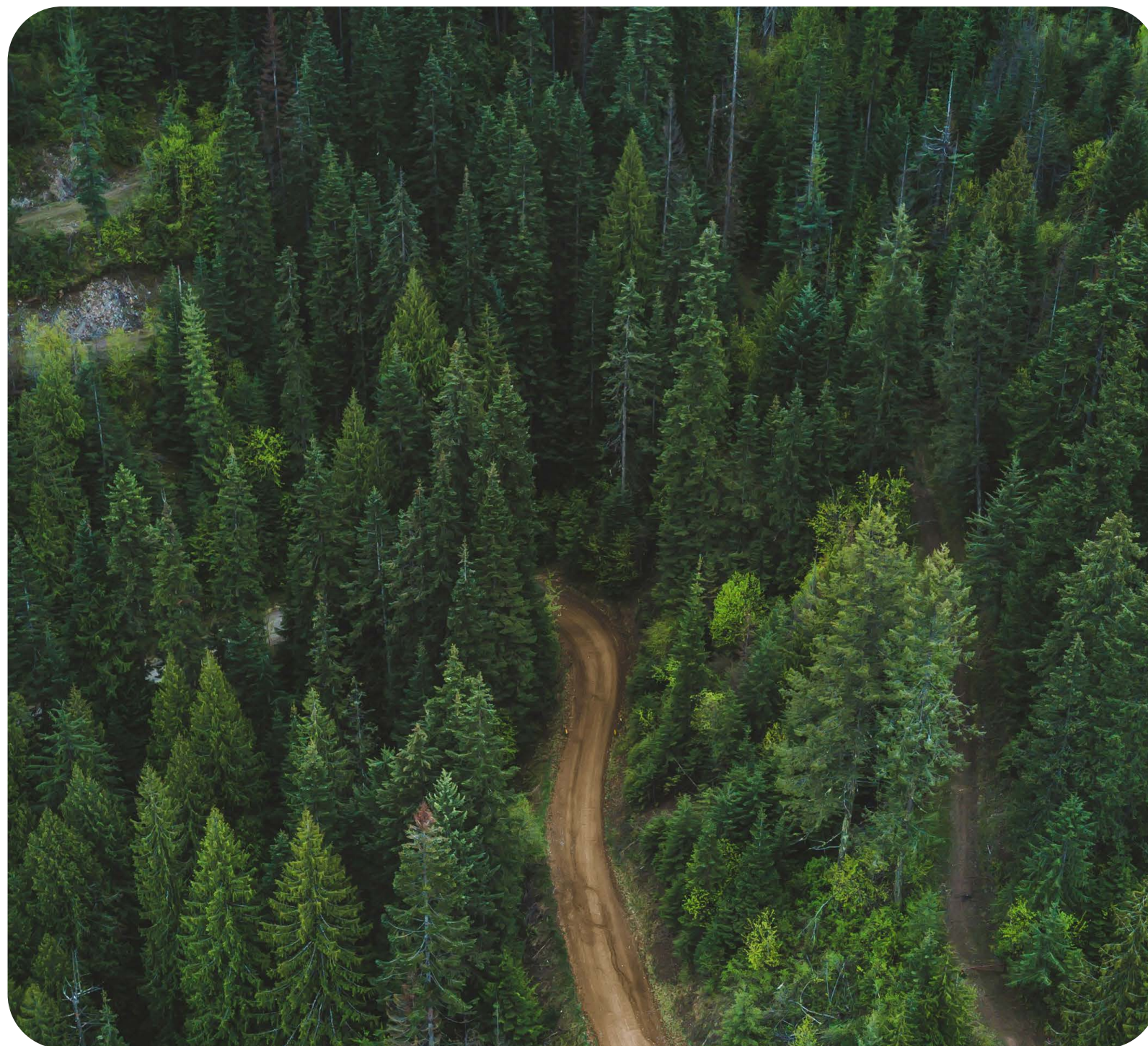
In parallel with our waste reduction efforts, we have implemented process optimization strategies aimed at minimizing material consumption at the source.

In recent years, we significantly decreased our office paper usage through the digitization of internal documentation, client deliverables, and contract management workflows. Transitioning to cloud-based platforms has notably reduced the reliance on printed materials.

As a concrete example, all business cards for our management team have been converted to digital formats, eliminating the need for printed versions and aligning with our commitment to dematerialization.

We also adopted a lean procurement policy that prevents overstocking and encourages on-demand purchasing, particularly for office supplies and promotional items.

Through these comprehensive waste management practices, we aim to reduce our environmental footprint, empower employees with practical knowledge, and support the transition toward a more circular and responsible business model.



COMMUNITY

COMMUNITY



A. Health, Safety and Well-Being

At Semtrio, ensuring the health, safety, and well-being of our employees is a core commitment. A safe and supportive work environment not only enhances productivity but also fosters job satisfaction and long-term engagement. That's why we take a proactive approach—through risk assessments, emergency response plans, and continuous training programs—to prevent workplace hazards before they occur. Measures are taken against possible work accidents and near misses, and continuous improvements are made through root cause analysis. Additionally, we have initiated plans to develop a comprehensive Emergency Action Plan to enhance our preparedness for potential critical situations across all work environments.

Our Labor and Human Rights Policy underscores this commitment, ensuring that every employee's physical and psychological well-being is protected. Through occupational health and safety risk analysis, we assess all operational environments—including office spaces, remote work setups, and fieldwork locations. Rights are protected within the legal framework, and safety and security rights are respected. As of 2023 and 2024, employee health and safety risk assessments have been conducted for 100% of our operational sites. This framework extends not only to employees but also to external

contractors and visitors, ensuring a secure and inclusive workplace for all.

Identifying and Addressing Workplace Risks

Employees face various health and safety risks, depending on their work setting. We take a preventive and solutions-driven approach, focusing on key risk areas:

- **Musculoskeletal Disorders (WRMSDs):**
Office-based roles often involve prolonged sitting, static postures, and inadequate workstation setups, leading to discomfort and potential injury. To combat this, we provide ergonomic chairs, height-adjustable desks, and workstation guidance, helping employees maintain proper posture and movement habits.
- **Mental Health and Work-Related Stress:**
The fast-paced work environment, high demands, and long hours can contribute to stress and burnout. We prioritize mental well-being by offering training in stress management, time management, and effective leadership, while also encouraging a healthy work-life balance.
- **Air Quality and Indoor Environment Risks:**
Poor ventilation, airborne pollutants, and humidity imbalances can impact respiratory health and overall comfort. Our offices are equipped with advanced air circulation systems and undergo routine air quality monitoring to ensure a safe working environment.

- **Screen-Related Risks:**
Staring at screens for extended periods can cause eye strain, headaches, and fatigue. Employees are encouraged to adjust screen brightness, take regular breaks, and practice eye relaxation techniques to reduce strain.
- **Kitchen Safety:**
Workplace kitchens can pose risks such as foodborne illnesses, burns, and injuries from kitchen tools. We maintain strict hygiene standards and conduct regular safety checks to prevent accidents.
- **Remote Work Challenges:**
Working from home presents its own risks, including poor ergonomic setups and social isolation. We support remote employees by providing workstation guidance and encouraging virtual engagement and team collaboration.
- **Fieldwork & Travel Hazards:**
Employees who travel for work might face traffic accidents and on-the-road safety risks. To mitigate this, we provide comprehensive travel safety guidelines, emergency response protocols, and support systems.

Through these preventive measures, we ensure a safe and healthy work environment. During the reporting period, no injuries or occupational diseases have been identified or caused.

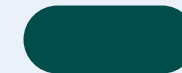


A Culture of Open Communication

A safe workplace is built through collaboration. At Semtrio, we actively engage employees in shaping their own work environment through regular communication and feedback channels.

- Weekly team check-ins and monthly department-wide meetings create an open space for discussing concerns and improvements.
- Employees can anonymously report feedback and concerns using the Retro Tool, ensuring that every voice is heard.
- Quarterly employee satisfaction surveys help us identify trends and implement real-time improvements. Action points are addressed promptly, while longer-term challenges become strategic goals for continuous improvement. As of 2024, a new section regarding employee stress levels and their sources has been added to these surveys, allowing for more targeted interventions to support mental well-being. In 2024, overall employee satisfaction was monitored through quarterly surveys, with results outlined below:

Survey Period	Overall Satisfaction Rate (%)
Q1	79.49%
Q2	81.73%
Q3	80.12%



We also have two employee representatives who serve as key links between management and staff. This representation model strengthens mutual understanding and supports a healthy culture of social dialogue. Currently, 100% of our workforce across all locations is represented in formal joint management-worker health and safety committees, ensuring that all employees have a voice in shaping the practices that protect their well-being.

A Culture of Health and Well-Being

Our dedication to employee well-being goes beyond safety policies—it extends to healthcare, continuous learning, and professional development.

- Every employee is covered under private health insurance, ensuring access to quality medical care whenever needed.
- From day one, well-being is a priority, starting with onboarding sessions that emphasize workplace health and safety.
- Employees undergo health screenings during recruitment and at regular intervals to monitor their overall health.
- We believe in continuous education; all employees receive regular training sessions on occupational health and safety, health and safety risks, and emergency preparedness, ensuring ongoing awareness and readiness across the organization. These programs equip our workforce with the knowledge and tools to maintain a safe and supportive environment.

At Semtrio, we also promote responsible behaviors and social well-being.

- Prohibited substances and betting endanger people's health and the overall well-being of society. As a result, Semtrio prioritizes employees risk awareness programs. Our main goals are societal health and individual well-being, and addressing these hazards is part of our social responsibility.
- Employees who do not use tobacco products are rewarded with five extra days of leave, promoting a healthier lifestyle.
- A sense of community and belonging is essential for well-being. We organize workshops, tournaments, team dinners, and special celebrations, fostering stronger workplace connections. In 2024, we organized a golf outing, an adventure park visit and a year-end dinner. These gatherings offered meaningful opportunities for our colleagues to connect, unwind and enjoy shared experiences that support a positive work environment and overall well-being.

At Semtrio, we believe that a thriving workplace starts with a safe and healthy team.

By continuously evolving our health and well-being strategies, we empower our employees to do their best work in an environment where they feel secure, valued, and supported.

Safety is not just a policy; it is a mindset. By fostering a culture of care, responsibility, and continuous improvement, we ensure that every employee can grow, contribute, and succeed while driving the long-term success of Semtrio.



B. Excellence in Work Conditions

At Semtrio, we uphold the principle that professional excellence is inseparable from a culture of respect and integrity. We believe that the quality of our work environment directly influences our performance, drives our development, and fosters collective success. Thus, our human capital is the cornerstone of our operations and our most important asset.

Our approach is rooted in international human rights principles, national labor laws, and a simple idea: when people feel valued, they do their best work. With clear policies, open communication, and flexibility built into our culture, we aim to be the kind of company where people want to stay and grow.

1. Employment

At Semtrio, we aim to be the “**employer of choice**” for both experienced professionals and young talent, offering meaningful work, professional development, and a culture built on fairness and inclusion.

We ensure our Labor and Human Rights Policy full compliance with national Labor Law No. 4857, alongside adherence to international standards such as the Universal Declaration of Human Rights, ILO Conventions, and the Declaration on Fundamental Principles and Rights at Work.

Our commitment to human rights goes beyond compliance. We integrate these principles into every aspect of our operations.

Moreover, 100 percent of all operational sites have been subject to human rights reviews or human rights impact assessments, ensuring full alignment with our ethical and legal responsibilities.

Accordingly, we maintain a zero-tolerance policy toward child labor, forced labor, discrimination, and harassment in any form. We verify age and identity during recruitment and never engage in or support practices that violate human dignity. No one is pressured to work overtime or kept in a job against their will. Freedom, safety, and respect are non-negotiables.

A tolerant work culture is maintained, ensuring that no employee or business partner is exposed to an oppressive, stressful, or tense work atmosphere. Reasonable and measurable



targets and performance expectations are set and acted upon. Mobbing and harassment whether verbal, physical, psychological, or through abuse of authority has no place at Semtrio. Complaints are investigated seriously and promptly. Victims are supported. Perpetrators are held accountable. We maintain a culture of fairness and integrity, where privacy is respected and every individual is treated with dignity.

Inclusion is more than a policy; it is how we build better teams. Our recruitment and promotion within the company are carried out based on professional experience and abilities. We

actively encourage young professionals to take on leadership roles and contribute to decision-making. Their ideas help us stay innovative, diverse, and future-ready. With Gen Y and Z soon making up most of the workforce, we are building an organization that reflects their energy and perspective.

In line with this demographic trend, 65% of our workforce in 2024 is under the age of 30, while 35% falls within the 30 to 50 age range. Currently, we do not have employees over the age of 50. This age profile reflects a young and dynamic organization, which we support

through targeted learning opportunities and career development initiatives tailored to early-career professionals.

Although we do not employ part-time staff, we support the development of young talent through our structured internship program, offering students meaningful learning experiences and exposure to real-world challenges.

We are committed to maintaining a fair and transparent hiring process that promotes diversity and ensures unbiased access to career opportunities. At Semtrio, all recruitment decisions are based on objective evaluation criteria aligned with role requirements and candidate competencies. Job announcements are openly published, and selection procedures are designed to minimize unconscious bias.

Throughout the process, consistent interview formats and predefined assessment standards help safeguard impartiality. By aligning our hiring practices with our values of fairness and equal opportunity, we ensure that every candidate—whether internal or external—is evaluated solely on their potential and suitability.

Our onboarding process is structured, personalized, and designed for maximum efficiency. Every new hire spends the first two months in the office to better adapt to our culture and workflows before transitioning into a hybrid working model. Hybrid schedules are shared in advance at the beginning of each month to support individual planning. From the very first day, each newcomer is matched with a team member through our Buddy System—ensuring a smooth introduction to company practices, culture, and day-to-day dynamics.

Following the general orientation, a technical onboarding session is conducted within the employee's department to provide deeper insight into role-specific processes and expectations.

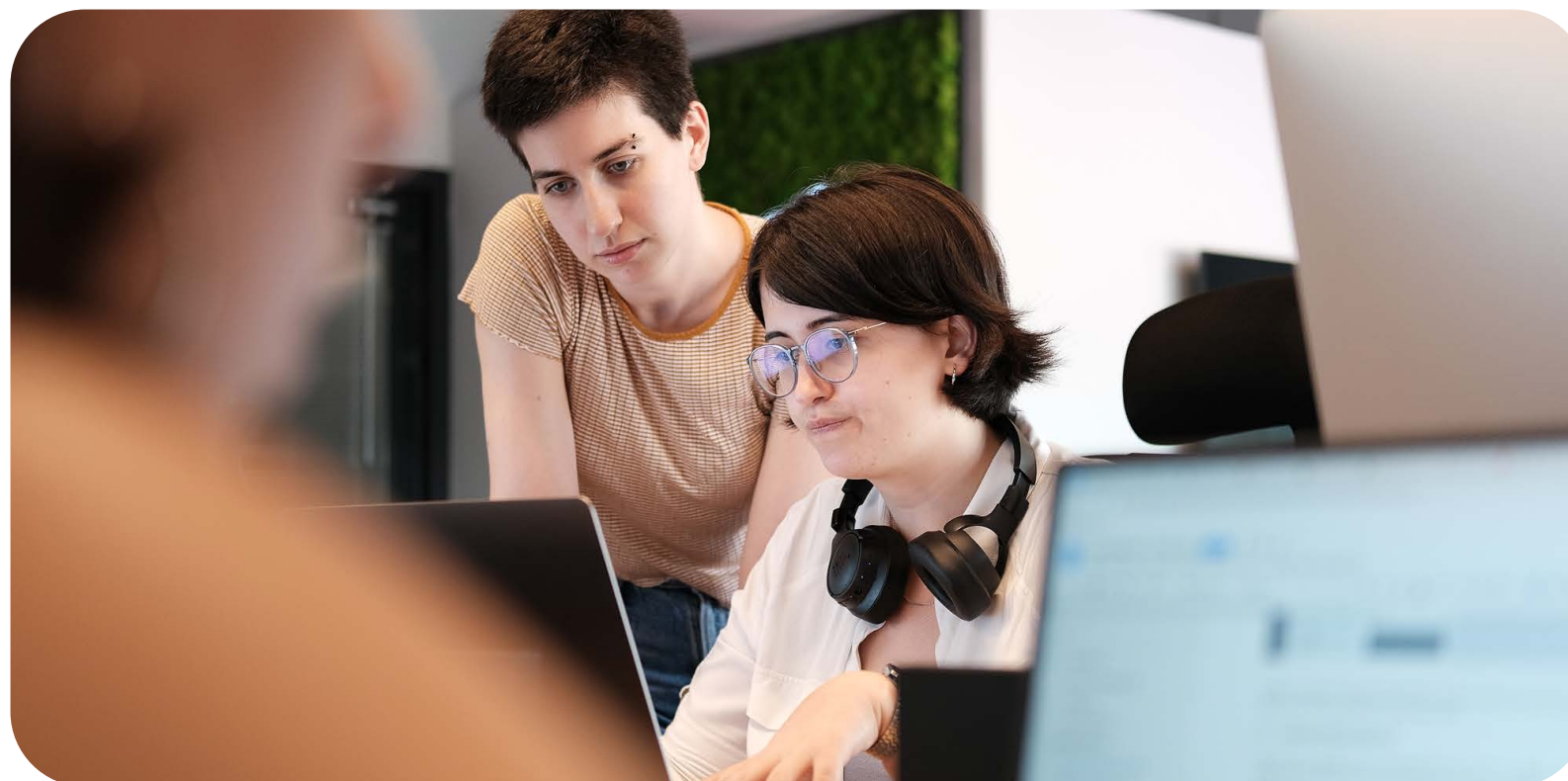
To support continuous learning, all relevant onboarding materials and internal policies are accessible at any time via the Human Resources folder on SharePoint. This allows employees to revisit resources and actively engage in their own learning journey throughout the orientation period and beyond.

As new hires settle into their roles and routines, we also recognize the importance of supporting our employees' evolving needs outside of the workplace. Acknowledging the diverse

responsibilities our employees carry outside of work, we support flexible working arrangements as part of our employee-centered approach.

We recognize that personal commitments—such as family, health, and individual well-being—are integral to a fulfilling life. Therefore, we offer flexibility in working hours, enabling our team members to manage these responsibilities without compromising productivity or professional growth.

At Semtrio, work-life balance is not treated as an added benefit, it is a fundamental part of our organizational culture.



2. Benefits Provided

Our benefits are part of how we show respect for the people who make Semtrio what it is. Our wage and benefits policy is designed to be fair, motivating, and sustainable. It is informed by market research, sector trends, and real employee needs, supported by up-to-date data.

Wage determination, annual salary increases, performance bonuses, R&D rewards, high season bonuses, and various supports such as meal, car, mobile phone, maternity, and private health insurance are all planned within the framework of our compensation policy. These policies apply to all employees except partners.

All compensation and benefits are managed through Kolay IK, our HR platform. It keeps everything accessible, transparent, and efficient—employees can view entitlements, make requests, and track approvals without delay.

In line with our commitment to equitable remuneration, Semtrio operates on a strict “equal pay for equal contribution” principle that is entirely gender-neutral.

To verify that practice, we track the Average Unadjusted Gender Pay Gap every year. Over the past three reporting periods our indicator has remained close to parity 102% in 2024 confirming

that women and men performing comparable work receive essentially the same compensation. Beyond internal parity, we also benchmark total remuneration against reputable external references.

Each year our HR team compares salary bands with national inflation data, cost-of-living analyses, and industry pay studies (including independent sources such as research by the Anker Institute).

Our benefits include:

Private Health Insurance

For all employees



Birthday Leave

We grant a full day off so that our employees can spend their birthday, one of the most special days, as they wish.



Non-Smoker Leave

As part of our commitment to promoting a healthier lifestyle, we offer an additional five days of annual leave to non-smoking employees. Through this policy, we aim to encourage and support our employees in their efforts to quit smoking.



Academic Leave

We support our employees to advance their academic development through undergraduate, graduate, and doctoral studies, and we offer academic leave that they can use whenever they want.



Office Campus Facilities



Our office is located in Boğaziçi University Technopark (BÜDOTEK), offering the advantages of being part of one of Türkiye's most prestigious academic environments. The area provides access to healthy dining options, including choices suitable for our vegan and vegetarian employees. A gym, green areas, and walking tracks within the Technopark also support employee well-being by encouraging physical activity and relaxation during breaks.

We fully comply with all legal requirements regarding paid leave and go beyond the minimum standards to provide our employees with comprehensive time-off support that reflects life's many circumstances.

We offer **fully paid maternity leave of 8 weeks before and 8 weeks after childbirth**, in line with legal standards. Where medically approved, employees may work up to three weeks before the expected delivery date, allowing the unused portion to be added to their postnatal leave period—extending their recovery and bonding time.

During pregnancy, women employees are given paid leave for periodic check-ups. To support adoptive families, we grant **8 weeks of paid leave** to employees adopting a child under the age of three, starting from the date the child joins the household.

We also support new mothers by offering **1.5 hours of daily paid breastfeeding leave**, scheduled at the employee's discretion. This time is counted within the official workday and may not be accumulated or used collectively.

As a token of celebration and support, Semtrio presents a gold gift to employees upon the birth of a child, recognizing this meaningful life event.

In addition, we provide **paid leave for personal and family-related needs**, including:

- **Medical appointments:** Up to 3 days per year for hospital visits that do not require a formal medical report.
- **Paternity leave:** 5 working days.
- **Bereavement leave:** 3 working days for the loss of a spouse, parent, child, or sibling, extendable upon management's discretion.
- **Marriage leave:** 3 working days.
- **Relocation leave:** 1 working day in the case of a change in permanent residence.
- **Emergency or disaster leave:** 2 working days for events such as home damage, natural disasters, or fire.
- **Accident leave:** 2 working days for incidents involving a spouse or first-degree relative.

These leave policies reflect our commitment to employee well-being, acknowledging that personal responsibilities and unexpected life

events require flexibility, empathy, and institutional support.

The standard workweek is 40 hours. If employees need to work beyond regular hours due to business needs or time constraints, overtime is compensated as required by law. In such cases, employees are paid at a rate of 1.5 times their hourly wage, in full compliance with labor legislation. We actively encourage our employees to take breaks, use their leave, and maintain a healthy work-life balance.

3. Employer-Employee Relations

We believe that strong teams are built on trust—and trust begins with open and consistent communication. To foster this environment, each sub-team holds weekly meetings to review progress, address challenges, and set priorities. Additionally, the entire department comes together once a month to ensure alignment across teams.

Ahead of these meetings, employees are encouraged to submit anonymous feedback through our Retro Tool. This platform allows individuals to share concerns, celebrate wins, or voice anything else on their minds. On a quarterly basis, we conduct company-wide engagement and satisfaction surveys. The insights gathered from these surveys are used to identify clear areas for improvement. **Actionable topics are addressed by the following month, while broader issues that require more time are integrated into our longer-term goals.**

These surveys also help us monitor interpersonal dynamics in the workplace, including early signs of discomfort or inappropriate behavior. **While**

feedback remains anonymous, recurring themes are reviewed by the HR and ethics teams to identify any emerging risks related to workplace conduct or harassment.

Performance management is another integral part of our communication culture. Annual performance targets are established for each employee, and progress is reviewed through mid-year and year-end evaluations. These reviews are designed to be two-way conversations, providing space for employees to offer feedback, ask questions, and actively participate in defining success.

In addition, we track project-based workloads and task completions through an integrated digital platform, which enables regular monitoring of working hours.

This system supports the early detection of potential overtime trends and ensures that workloads remain fair and manageable across the team. Periodic audits and project evaluations allow project managers to proactively adjust timelines or redistribute tasks to maintain a healthy work-life balance for all employees.

At the end of the year, performance evaluations and one-on-one interviews are conducted, where employees are informed of expectations, accomplishments, and future targets. During these sessions, employees are also given the opportunity to share their views and

provide comments.

Furthermore, any decisions that may affect employees' roles or working conditions are communicated transparently within two weeks.

This commitment to timely and honest communication helps ensure that every team member feels valued, informed, and empowered.

We maintain an open-door policy—both literally and culturally. Employees can raise concerns or suggestions directly with leadership or anonymously through our digital platform. We also support employee representation: elected representatives meet regularly with management to share feedback and identify areas for improvement. **These meetings ensure shared accountability and keep our culture grounded in transparency.**

Above all, we respect every employee's right to organize and engage in collective bargaining. Whether it's through one-on-one conversations, surveys, team retrospectives, or structured representative meetings—every voice at Semtrio matters.



C. Career Management

At Semtrio, career development is a strategic and evolving journey that begins on day one.

Each new team member receives a personalized career plan tailored to their strengths, aspirations, and long-term potential. While these plans align with organizational goals, they are purposefully designed around individual ambitions.

We see career growth not as a rigid ladder, but as a dynamic and meaningful progression.

To support this vision, every new hire begins with a two-month onboarding program, combining structured orientation and focused training. **This is followed by our “Buddy” system, where newcomers are paired with experienced colleagues to ease their transition into Semtrio's culture, workflows, and tools.** These early initiatives play a key role in fostering engagement and laying the foundation for future success.

In the professional, scientific, and technical sectors, thriving requires more than subject-matter expertise—it demands adaptability, continuous learning, and the flexibility to evolve across roles.

Our cross-functional training programs go beyond formal job descriptions, helping employees broaden their skill sets and prepare for internal mobility. This approach enables us to remain agile in the face of shifting business needs while ensuring individual growth is never compromised. Project assignments are also approached with a developmental mindset, where each consultant is assigned to roles that align not only with their existing capabilities but also with areas where they can grow, gain new experience, and advance in their career journey.

At Semtrio, career development is an ongoing, feedback-driven process. We conduct quarterly performance interviews that allow for timely reflection, goal alignment, and developmental support. These sessions balance recognition of achievements with constructive feedback, fostering a culture of continuous improvement.

In addition, our annual performance reviews offer a holistic view of each employee's journey, using transparent and fair evaluation methods, with measurable objectives set collaboratively.

In 2024, 100 percent of the total workforce across all locations received regular performance and career development reviews, underscoring our commitment to inclusive and comprehensive talent management.

Our learning strategy supports both individual advancement and organizational resilience. In 2023–2024, we launched several key initiatives addressing high-priority areas:

- ✓ Sustainable Procurement Training
- ✓ Business Ethics Training
- ✓ Human and Employee Rights Training (7 modules):
 - Introduction to Business and Human Rights
 - Employee Health and Safety
 - Health and Safety Risks
 - Diversity, Inclusion, and Equity
 - Discrimination, Misconduct, and Mobbing
 - Policies and Procedures
 - Reporting and Support Mechanisms
- ✓ Environmental Awareness Training
- ✓ Information Security Training

We actively support internal mobility across various dimensions through structured performance management and individualized development plans. To promote vertical mobility, soft and technical qualifications are discussed during quarterly performance reviews, and follow-up is ensured through regular check-ins. Where needed, tailored training support is also provided. Similarly, depending on the employee's strengths and interests, horizontal mobility may be offered within the company during specific periods. Aptitudes such as verbal and numerical reasoning are evaluated to support mobility decisions throughout the employment lifecycle.

At the same time, all promotion and professional development decisions are guided by clear anti-discrimination principles. Human Resources and line managers receive regular

guidance on equal-opportunity practices, ensuring that every assessment is merit-based and free from bias related to gender, age, disability, ethnicity, or any other personal attribute. Semtrio provides equal access to training budgets and development programs across departments, so that every employee—regardless of role or background—can progress on the basis of demonstrated competencies and career aspirations.

In this regard, we offer targeted leadership, coaching, and mentoring programs, alongside company-wide sessions on practical skills such as effective communication, AI tools, and

everyday digital applications. These learning opportunities not only support career growth but also enhance daily performance and well-being.

In addition, our employees benefited from workshops provided by the Springfox design team and participated in finance training programs aimed at strengthening financial literacy and business acumen across teams.



Beyond formal training, we maintain an open-door approach to learning. Employees are encouraged to request additional courses, certifications, or webinars that align with their professional goals, and we respond promptly to support their growth.

Across these programs, a total of 120 training hours were completed in 2023 and 180 training hours were completed in 2024, reflecting our growing commitment to continuous learning and professional development.

We also proactively identify opportunities for internal mobility, especially when roles become repetitive or no longer align with an employee's trajectory.

This agility allows us to retain top talent, promote transitions, and ensure our people work in roles where they thrive.

At Semtrio, we view talent development as a long-term investment. By aligning individual aspirations with our evolving business needs, we strengthen retention, enhance employee satisfaction, and cultivate a future-ready workforce prepared to lead in a constantly changing world.



D. Diversity, Equity, and Inclusion (DEI)

At Semtrio, we believe that our people are our greatest asset in creating a sustainable future. Our dedication to diversity, equity, and inclusion is deeply embedded in our values, shaping both our internal culture and our stakeholder engagement. We understand that building a truly sustainable and innovative organization requires a foundation rooted in equal rights, fair opportunities, and mutual respect.

We strive to cultivate a participatory and inclusive work environment where individuals from diverse cultures, backgrounds, and life experiences come together. Diversity in all its forms, including gender, age, ability, socioeconomic status, nationality, religion, and beyond, is embraced as a source of strength. We ensure that every voice is heard and that all individuals can thrive regardless of gender identity, disability status, or sociocultural background.

To further strengthen awareness across the organization, we provide regular training sessions on diversity, equity, and inclusion. These programs are designed to promote understanding, challenge unconscious biases, and foster inclusive behaviors at all levels.

These efforts to build awareness and foster inclusion are mirrored in the way we structure our teams and promote equity across the

organization. Our gender-balanced workforce, consisting of **21** women and 10 men in 2024, reflects our commitment to equality. **Women represent 68% of our total workforce in 2024, and 79% of our top management positions are held by women.** For us, equity is about more than representation.

All of our human resources practices, including recruitment, promotion, compensation, training, disciplinary procedures, and termination, are guided by principles of fairness, merit, and performance. In line with this approach, we follow a structured process to prevent discriminatory promotion practices and to ensure that all employees have equal opportunities for professional development. Our non-discrimination principle also guarantees that human rights are exercised without discrimination of any kind based on race, color, sex, language, religion, political or other opinion, national or social origin, property, birth or other status such as disability, age, marital and family status, sexual orientation and gender identity, health status, HIV status, place of residence, economic and social situation. We uphold the principle of equal work for equal pay with no tolerance for any form of discrimination or bias.

Our commitment to inclusion is reflected in how we design and operate our workplaces. The BÜDOTEK Campus, for example, is fully accessible and includes designated parking and charging areas that meet the needs of employees with disabilities. Additionally, our flexible remote work model supports equal participation by removing physical barriers and



enabling employees with mobility challenges to fully engage in professional life.

We place strong emphasis on advancing women's participation in the workforce, not only within our organization but also across our business network. Promoting gender equality in all areas of corporate life, including external stakeholder engagement, is a central value that guides our actions.

We are committed to providing a safe, respectful, and inclusive working environment where harassment of any kind, whether

verbal, physical, psychological, or associated with abuse of power, is never tolerated. **Our whistleblower policy plays a critical role in this approach by offering employees and stakeholders a secure and confidential channel to report misconduct, including harassment and retaliation.**

Every report is handled with care and confidentiality by our disciplinary committee, and appropriate action is taken when necessary. We ensure that no one who speaks up in good faith will face retaliation, discrimination, or stigma.



Concerns can be reported through our hotline at **+90 216 807 02 48** or by email at **ethics@semtrio.com**

These channels reflect our broader commitment to transparency and accountability and are essential to upholding our corporate values across all levels of the organization.

Our human resources practices are centered on supporting the growth, involvement, and overall well-being of our people. We are committed to fostering a culture that embraces diverse viewpoints as essential to driving creativity and innovation. By fostering an inclusive atmosphere, we empower every employee to bring their full self to work and contribute their talents and ideas.

Diversity, equity, and inclusion are not treated as isolated policies at Semtrio. They are embedded in who we are and how we operate. We imagine a future where social equality is fundamental to global sustainability. That is why we continue to shape our culture with no distinction based on religion, language, ethnicity, or gender. We believe that without equality, a sustainable world is not possible, and we are proud to contribute to building that world together.

ANNEXES

ENVIRONMENT PERFORMANCE INDICATORS

Climate Change*			
Reporting Year	2022	2023	2024
Total Energy Consumption (kWh)	-	8,166	12,263
Total Renewable Energy Consumption (kWh)	-	0	0
Total Gross Scope 1 Emission (tCO ₂ e)	42	7.6	7.3
Total Gross Scope 2 Emission (tCO ₂ e)	24	3.0	4.9
Total Gross Scope 3 Upstream Emission (tCO ₂ e)	25	37	30
Total Gross Scope 3 Downstream Emission (tCO ₂ e)	0	0	0
Total Gross Scope 3 Emission (tCO ₂ e)	25	37	30
Total Scope 1-2 Emissions (tCO ₂ e)	66	10.6	12.2
Total Scope 1-2-3 Emissions (tCO ₂ e)	91	47.6	42.2
Percentage of Employees Trained on Climate Change (%)	100%	100%	100%

Water and Waste Management			
Reporting Year	2022	2023	2024
Total Weight of Hazardous Waste (kg)	0	0	0
Total Weight of Non-Hazardous Waste (kg)	1,200	939	791
Total Weight of Waste Recovered (kg)	-	807	680
Water Consumption Per Capita (m ³ /person) **	50.5	173	146
Percentage of Employees Trained on Water and Waste Management (%)	100%	100%	100%

* GHG emissions for the year 2022 were calculated in accordance with ISO 14064. The calculations for 2023 and 2024 were conducted based on the GHG Protocol standards, and the values presented in the table are based on the GHG Protocol to ensure consistency and comparability.

** EF Reference, Defra, 2024, Water supply, D18" is used in the context of the Environmental Footprint (EF) method to assess water consumption.



ENVIRONMENT

PERFORMANCE INDICATORS

Other Environmental KPIs			
Reporting Year	2022	2023	2024
Percentage of Clients Trained on Sustainability & Climate Change (%)	100%	100%	100%
Number of Clients with Approved Science-Based Targets (SBTi)	-	2	2
GHG Emissions Reduction Achieved by Clients Receiving SBTi Advisory Services (tCO ₂ e)	-	9,750	51,069

SOCIAL PERFORMANCE INDICATORS

Career Management			
Reporting Year	2022	2023	2024
Total Training Cost (TRY)	5,827	20,000	84,000
Average Hours of Training per Employee	1.2	6	6
Employees who received Career or Skill-Related Training (%)	100%	100%	100%
Employees who received Performance and Career Development Reviews (%)	100%	100%	100%

Excellence in Work Conditions			
Reporting Year	2022	2023	2024
Total Number of Employees (#)	68	38	31
Women (#)	35	27	21
Men (#)	33	11	10
Total Percentage of Employees by Age (#)			
<30	40	25	20
30-50	19	12	11
>50	1	1	0
Employee Turnover Rate (%)	43%	58%	34%
Number of Employees on Maternal/Paternal Leave	0	3	2
Women (#)	0	1	2
Men (#)	0	2	0
Number of Employees Who Returned to Work After Maternal/Paternal Leave	0	2	2
Women (#)	0	0	2
Men (#)	0	2	0
Total Percentage of Employees receive Healthcare Coverage	100%	100%	100%



SOCIAL PERFORMANCE INDICATORS

Diversity, Equity and Inclusion (DEI)			
Reporting Year	2022	2023	2024
Percentage of Women Employees (%)	51%	71%	68%
Percentage of Women Employees in Top Management (%)	42%	58%	79%
Percentage of Minority or Underemployed Employees (%)	-	15.8%	16.1%
Average Unadjusted Gender Pay GAP (%)	99.9%	98.22%	102%
Employees who received DEI Training (%)	100%	100%	100%

Health, Safety and Wellbeing			
Reporting Year	2022	2023	2024
Number of Work-Related Ill Health (#)	0	0	0
Number of Work-Related Accidents (#)	0	0	0
Employees who received Health & Safety Training (%)	100%	100%	100%

GOVERNANCE PERFORMANCE INDICATORS

Client and Project Selection			
Reporting Year	2022	2023	2024
Customers who have Signed the Supplier & Customer Code of Conduct (%)	0%	100%	100%

Responsible and Sustainable Supply Chain Management			
Reporting Year	2022	2023	2024
Suppliers who have Signed the Supplier & Customer Code of Conduct (%)	0%	100%	100%
Suppliers with Contracts That Include Clauses on Environmental, Labor, and Human Rights Requirements (%)	0%	30%	100%
Suppliers Covered by an Online CSR Assessment (%)	0%	50%	100%
Suppliers Covered by a CSR On-Site Audit (%)	0%	0%	10%
Buyers who Received Training on Sustainable Procurement (%)	0%	100%	100%
Supplier Trainings for Capacity Building (%)	0%	0%	25%
Local Suppliers Percentage (%)	-	-	72%
Women-Owned Suppliers Percentage (%)	-	-	2%

GOVERNANCE PERFORMANCE INDICATORS

Business Ethics and Transparency				
Reporting Year	2022	2023	2024	
Number of Confirmed Corruption Incidents (#)	0	0	0	
Number of Reports Related to Whistleblower Procedure (#)	0	0	0	
Percentage of Employees Trained on Business Ethics (%)	-	100%	100%	
Training Hours per Employee on Business Ethics (hours)	0	3	3	

Data Security				
Reporting Year	2022	2023	2024	
Number of Confirmed Information Security Incidents (#)	0	0	0	
Percentage of Employees Trained on Information Security (%)	100%	100%	100%	
Training Hours per Employee on Information Security (hours)	2	2	2	

Client Satisfaction and Complaint Mechanism				
Reporting Year	2022	2023	2024	
Client Satisfaction Rate (%)	-	-	88%	

GRI CONTENT INDEX

Statement of use	Semtrio Eğitim ve Danışmanlık Hizmetleri A.Ş. has reported in accordance with the GRI Standards for the period of January 1, 2023 - December 31, 2024
GRI 1 used	GRI 1: Foundation 2021

GRI STANDARD	DISCLOSURE	SUBJECT HEADING	PAGE NUMBER, SOURCES AND/OR DIRECT ANSWERS	ADDITIONAL INFORMATION/ REASONS OF OMISSION
GRI 2: General Disclosures 2021	2-1 Organizational details	About the Report, About Semtrio	4, 8-11	
	2-2 Entities included in the organization's sustainability reporting	About the Report	4	
	2-3 Reporting period, frequency and contact point	About the Report	4	
	2-4 Restatements of information		There are no restatements of information from previous reporting periods.	
	2-5 External assurance		The sustainability report has not been externally assured.	
	2-6 Activities, value chain and other business relationships	Sustainable Collaborations	22-23	
	2-7 Employees	Employment	54-56	
	2-8 Workers who are not employees		The organization does not engage non-employee workers.	
	2-9 Governance structure and composition	Sustainable Governance	13-14	
	2-10 Nomination and selection of the highest governance body	Sustainable Governance	13-14	
	2-11 Chair of the highest governance body	Sustainable Governance	13-14	
	2-12 Role of the highest governance body in overseeing the management of impacts	Sustainable Governance	13-14	

GRI CONTENT INDEX

GRI STANDARD	DISCLOSURE	SUBJECT HEADING	PAGE NUMBER, SOURCES AND/OR DIRECT ANSWERS	ADDITIONAL INFORMATION/ REASONS OF OMISSION
GRI 2: General Disclosures 2021	2-13 Delegation of responsibility for managing impacts	Sustainable Governance	13-14	
	2-14 Role of the highest governance body in sustainability reporting	Sustainable Governance	13-14	
	2-15 Conflicts of interest	Business Ethics and Transparency	26-30	
	2-16 Communication of critical concerns	Notice of Violation	28-29	
	2-17 Collective knowledge of the highest governance body	Sustainable Governance	13-14	
	2-18 Evaluation of the performance of the highest governance body			There is currently no formal process in place to evaluate the performance of the highest governance body.
	2-19 Remuneration policies	Benefits Provided	57-58	
	2-20 Process to determine remuneration	Benefits Provided	57-58	
	2-21 Annual total compensation ratio	Social Performance Indicators	66-67	
	2-22 Statement on sustainable development strategy	Message From The CEO	5-6	
	2-23 Policy commitments	Business Ethics and Transparency, Data Security, Employment	26-30, 34-36, 54-56	
	2-24 Embedding policy commitments	Our Commitments	16-21	
	2-25 Processes to remediate negative impacts	Notice of Violation	28-29	
	2-26 Mechanisms for seeking advice and raising concerns	Business Ethics and Transparency	26-30	
	2-27 Compliance with laws and regulations	Compliance	28	

GRI CONTENT INDEX

GRI STANDARD	DISCLOSURE	SUBJECT HEADING	PAGE NUMBER, SOURCES AND/OR DIRECT ANSWERS	ADDITIONAL INFORMATION/ REASONS OF OMISSION
GRI 2: General Disclosures 2021	2-28 Membership associations	Our Commitments	16-21	
	2-29 Approach to stakeholder engagement	Business Continuity	37-39	
	2-30 Collective bargaining agreements	Business Continuity	37-39	
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Materiality Analysis	23-24	
	3-2 List of material topics	Materiality Analysis	24	
Responsible And Sustainable Supply Chain Management				
GRI 3: Material Topics 2021	3-3 Management of material topics	Responsible And Sustainable Supply Chain Management	42-44	
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	Responsible And Sustainable Supply Chain Management	42-44	
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	Responsible And Sustainable Supply Chain Management, Governance Performance Indicators	42-44, 68-69	
	308-2 Negative environmental impacts in the supply chain and actions taken	Responsible And Sustainable Supply Chain Management	42-44	
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	Responsible And Sustainable Supply Chain Management, Governance Performance Indicators	42-44, 68-69	
	414-2 Negative social impacts in the supply chain and actions taken	Responsible And Sustainable Supply Chain Management	42-44	

GRI CONTENT INDEX

GRI STANDARD	DISCLOSURE	SUBJECT HEADING	PAGE NUMBER, SOURCES AND/OR DIRECT ANSWERS	ADDITIONAL INFORMATION/ REASONS OF OMISSION
Business Ethics and Transparency				
GRI 3: Material Topics 2021	3-3 Management of material topics	Business Ethics and Transparency	26-30	
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	Business Ethics and Transparency	26-30	
	205-2 Communication and training about anti-corruption policies and procedures	Business Ethics and Transparency	26-30	
	205-3 Confirmed incidents of corruption and actions taken	Business Ethics and Transparency, Governance Performance Indicators	26-30, 68-69	
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Business Ethics and Transparency	26-30	
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	Business Ethics and Transparency, Client and project selection, Responsible And Sustainable Supply Chain Management, Employment	26-30, 41, 42-44, 54-56	
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	Business Ethics and Transparency, Client and project selection, Responsible And Sustainable Supply Chain Management, Employment	26-30, 41, 42-44, 54-56	

GRI CONTENT INDEX

GRI STANDARD	DISCLOSURE	SUBJECT HEADING	PAGE NUMBER, SOURCES AND/OR DIRECT ANSWERS	ADDITIONAL INFORMATION/ REASONS OF OMISSION
Climate Change				
GRI 3: Material Topics 2021	3-3 Management of material topics	Climate Change	46-48	
GRI 302: Energy 2016	302-1 Energy consumption within the organization	Environmental Performance Indicators	64-65	
	302-4 Reduction of energy consumption	Climate Change, Environmental Performance Indicators	46-48, 64-65	
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Climate Change, Environmental Performance Indicators	46-48, 64-65	
	305-2 Energy indirect (Scope 2) GHG emissions	Climate Change, Environmental Performance Indicators	46-48, 64-65	
	305-3 Other indirect (Scope 3) GHG emissions	Climate Change, Environmental Performance Indicators	46-48, 64-65	
	305-5 Reduction of GHG emissions	Climate Change	46-48	
Water And Waste Management				
GRI 3: Material Topics 2021	3-3 Management of material topics	Water And Waste Management	49-50	
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	Water And Waste Management	49-50	
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GRI STANDARD	DISCLOSURE	SUBJECT HEADING	PAGE NUMBER, SOURCES AND/OR DIRECT ANSWERS	ADDITIONAL INFORMATION/ REASONS OF OMISSION
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	Water And Waste Management	49-50	
	306-2 Management of significant waste-related impacts	Water And Waste Management	49-50	
GRI 306: Waste 2020	306-3 Waste generated	Water And Waste Management, Environmental Performance Indicators	49-50, 64-65	
	306-4 Waste diverted from disposal	Water And Waste Management	49-50	
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Excellence in Work Conditions				
GRI 3: Material Topics 2021	3-3 Management of material topics	Excellence in Work Conditions	54-59	
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Employment, Social Performance Indicators	54-56, 66-67	
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Excellence in Work Conditions	54-59	
	401-3 Parental leave	Benefits Provided, Social Performance Indicators	57-58, 66-67	
GRI 402: Labor/Management Relations 2016	402-1 Minimum notice periods regarding operational changes	Employer-Employee Relations	58-59	



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GRI STANDARD	DISCLOSURE	SUBJECT HEADING	PAGE NUMBER, SOURCES AND/OR DIRECT ANSWERS	ADDITIONAL INFORMATION/ REASONS OF OMISSION
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	Our Commitments, Employer-Employee Relations	16-21, 58-59	
Health, Safety and Well-Being				
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Health, Safety and Well-Being	52-54	
	403-2 Hazard identification, risk assessment, and incident investigation	Health, Safety and Well-Being	52-54	
	403-3 Occupational health services	Health, Safety and Well-Being	52-54	
	403-4 Worker participation, consultation, and communication on occupational health and safety	Health, Safety and Well-Being	52-54	
	403-5 Worker training on occupational health and safety	Health, Safety and Well-Being	52-54	
	403-6 Promotion of worker health	Health, Safety and Well-Being	52-54	
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Health, Safety and Well-Being	52-54	
	403-8 Workers covered by an occupational health and safety management system	Health, Safety and Well-Being	52-54	
	403-9 Work-related injuries	Social Performance Indicators	66-67	
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GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Social Performance Indicators	66-67	
	404-2 Programs for upgrading employee skills and transition assistance programs	Career Management	59-61	
	404-3 Percentage of employees receiving regular performance and career development reviews	Career Management, Social Performance Indicators	59-61, 66-67	
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GRI 3: Material Topics 2021	3-3 Management of material topics	Diversity, Equity, and Inclusion (DEI)	61-62	
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Diversity, Equity, and Inclusion (DEI)	61-62	
	405-2 Ratio of basic salary and remuneration of women to men	Social Performance Indicators	66-67	
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	Diversity, Equity, and Inclusion (DEI)	61-62	

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GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Data Security	34-36	
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GRI 3: Material Topics 2021	3-3 Management of material topics	Client and project selection	41	

