

W0. Introduction

W0.1

(W0.1) Give a general description of and introduction to your organization.

Limak Group of Companies entered into the cement sector when it took over Siirt Kurtalan Cement Plant in 2000. It acquired Ergani and Gaziantep Cement Plants in 2006 through asset sale from the Savings Deposit Insurance Fund (SDIF), and Urfa Cement Plant in 2007. Group has completed investments in Bitlis in 2008 and in Mardin-Derik in 2009. At the end of 2010, the market share of Limak reached 7% in Turkey. In 2011, Group took over 4 cement plants located in Ankara, Balıkesir, Trakya & Ambarlı and 12 ready-mixed concrete facilities from Set-İtalcementi, and market share reached to 11%. By the completion of modernizations studies in factories, the clinker and the cement capacities of the Group have been increased to 8,000 ktons/year and 14,800 ktons/year respectively. Group started a grinding & packaging cement plant investment in March 2015 in Matola port located in Maputo, capital city of Mozambique, which has a capacity of 700.000 tons/year. The plant became operational at the end of 2016 Q4. Group had commissioned the new integrated cement plant in Ankara, Temelli, in Q3 of 2018 which have 1,800 ktons/year cement capacity. The second investment in Africa, which is another grinding & packaging cement plant with ready- mix concrete plant in Abidjan, commercial capital city of Côte d'Ivoire, has a capacity of 1.000.000 tons cement/year and 1.000.000 m3 of ready-mix concrete. The plant was put into operation in 2018 Q4. Furthermore, Group decided to invest in a new integrated cement plant in Kilis with a cement capacity of 2,3 mtons/year which is located in South Anatolia. The plant was put into operation in Q4 of 2019 and started commercial activities in January 2020. Today, Limak Cement Group has the second biggest production capacity in Turkey and has 14 % of domestic market share. Since 2000, the major achievements of Limak Cement over the years are operations and investments continued in 4 different countries, largest Turkish investments in two different Sub-Saharan African countries, ranked 111th among all companies and first in the cement sector according to the Top 500 Industrial Organizations of Turkey researches prepared by İstanbul Chamber of Industry (ISO), received "Best Industrial Investment Made in 2014-2017 Award" in Mozambique, 3 ready-mixed concrete R&D centers with international accreditation certificates, first projects in the Turkish cement sector with the energy efficiency and clean technology funds of the World Bank and European Investment Bank, low NOx emission rotary kilns with calcinators taken into operation for the first time in the Turkish cement sector, first rank among integrated cement factories in Turkey in the low energy consumption listing, according to the Ministry of Energy and Natural Resources data, first integrated cement factory with a GOLD Certificate (2 GOLD and 1 SILVER certificates), full compliance with the Sustainable Growth Objectives published by United Nations, "Most Environment Friendly Firm" in Turkey in 2018 award by the Ministry of Energy and Natural Resources, In Cote d'Ivoire, Limak Africa SA rewarded with the only cement plant to be in the top 10 in the ranking of the most environmentally friendly companies. An Integrated Management System, including the ISO 45001 Occupational Health and Safety Standard, is implemented at all cement factories. The Group has continued to reinforce the significance it attaches to the health and safety of all permanent and subcontractor employees, who are directly or indirectly employed within its organization, with the "zero accident, zero fatality" objective. Limak Cement Group has adopted an Integrated Management System in the group in general, in order to make more effective planning, define common objectives that are measurable and have added value, identify strengths and weaknesses, share correct and incorrect practices over a single platform, minimize unnecessary resource use and increase employee motivation by corporate synergy and common objectives. Studies on compliance with the current versions of ISO 14001 Environment Management System and ISO 9001 Quality Management System, which have been issued in 2015, have also been carried out in the Group in general. Limak Cement Anka Plant, which has been taken into operation in 2018, has received the title of being the first cement factory in Turkey holding an ISO 45001 certificate. Limak Cement Group has an action agenda primarily in 5 fields within the scope of its sustainability activities. These could be classified as CO2 & Environment Protection, Responsible Fuel and Raw Material Use, Employee Safety and Health, Emission Monitoring and Reduction, Local Impact on Soil and Community, Limak Cement Group participated in Limak Holding's sustainability reporting process every year, in compliance with the "Core" option of the GRI Standards developed by Global Reporting Initiative (GRI) and continued its activities within this context.

W0.2

(W0.2) State the start and end date of the year for which you are reporting data.

	Start date	End date
Reporting year	January 1 2022	December 31 2022

W0.3

(W0.3) Select the countries/areas in which you operate.

Turkey

W0.4

(W0.4) Select the currency used for all financial information disclosed throughout your response.

TRY

W0.5

(W0.5) Select the option that best describes the reporting boundary for companies, entities, or groups for which water impacts on your business are being reported.

Companies, entities or groups over which operational control is exercised

W0.6

(W0.6) Within this boundary, are there any geographies, facilities, water aspects, or other exclusions from your disclosure?

Yes

W0.6a

(W0.6a) Please report the exclusions.

Exclusion	Please explain
Head Office	Since the amount of water consumption in our head office is negligible, it is not included in our disclosure. Also in our head office, great attention is paid to the water footprint and the faucets in the handwashing section of our toilets working automatically. This system contributes to less consumption of water.
Guest House	Since the amount of water consumption in our guest houses are negligible, it is not included in our disclosure. Also in our guest houses, great attention is paid to the water footprint and the faucets in the handwashing section of our toilets working automatically. This system contributes to less consumption of water.
Ready mixed concrete business	Our ready-mixed concrete facilities are excluded in our reporting. Water management is carried out in our ready-mixed concrete facilities and water data are constantly monitored. Although the income from cement production is higher, it is planned to be reported for the coming years.

W0.7

(W0.7) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?

Indicate whether you are able to provide a unique identifier for your organization.	Provide your unique identifier
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W1. Current state

W1.1

(W1.1) Rate the importance (current and future) of water quality and water quantity to the success of your business.

	Direct use importance rating	Indirect use importance rating	Please explain
Sufficient amounts of good quality freshwater available for use	Vital	Not very important	Mains water and ground water in our factories are basically used in cooling systems, purification, washing, providing safe and clean water to employees, etc. water is of vital importance. With the awareness that water is a limited resource, efficiency and recycling of water resources are prioritized. In this context, water resources in cooling processes have a high recovery rate since they are used as closed loops. The wastewater released during the cement production process is collected in pools and recycled after settling and leaching processes. Wastewater that cannot be recovered after consumption is processed in wastewater treatment plants and discharged to the receiving environment in accordance with the quality parameters and limit values specified in the discharge standards. It is among our priority operations to continuously monitor and develop water efficiency studies and to create the necessary infrastructure.
Sufficient amounts of recycled, brackish and/or produced water available for use	Not very important	Not very important	Indirect use of water in our factories is used in dedusting and concrete road irrigation works, after the surface water is collected in settling ponds during the cement production process, after going through the leaching and settling processes. There is no sea water treatment or domestic wastewater reuse. The water used in our factories is drawn from mains and underground water wells.

W1.2

(W1.2) Across all your operations, what proportion of the following water aspects are regularly measured and monitored?

	% of sites/facilities/operations	Frequency of measurement	Method of measurement	Please explain
Water withdrawals – total volumes	100%	Monthly	The water drawn from the well is monitored monthly with the help of meters.	As the Limak cement group we regularly monitor, measure and report the total volume of water withdrawals for all our plants. The amount of water withdrawal is indicated in our water footprint reports and helps us in water management. Since reducing water and water management consumption are very important to us, all data on water withdrawal are presented simply and clearly. Next year, we plan to establish a water management platform within the scope of environmental, social and corporate governance practices, green reconciliation and clean production practices, and the European water framework directive. Depending on this platform, our aim will be leak detection, daily, weekly and monthly reports, consumption analysis, full-time water consumption monitoring via the online platform.
Water withdrawals – volumes by source	100%	Monthly	The water drawn from the well is monitored monthly with the help of meters.	As the Limak cement group, the monthly monitoring of the water flow chart, water uses, meter indices, water usage dashboard is done by the maintenance and repair department. Consolidated tables are controlled by the sustainability and climate change department. The water withdrawn in all our factories is drawn from the underground deep water well line and monitored by meters. There is no water withdrawal from any source other than water wells. Only in our Ankara factory, together with the well water, water is also supplied from the municipal networks as a third party source

	% of sites/facilities/operations	Frequency of measurement	Method of measurement	Please explain
Entrained water associated with your metals & mining and/or coal sector activities - total volumes [only metals and mining and coal sectors]	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Produced water associated with your oil & gas sector activities - total volumes [only oil and gas sector]	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Water withdrawals quality	100%	Monthly	According to our treatment plant capacity, wastewater analysis is completed every two months in some of our plants and every four months in some of our plants.	In our factories, the waste water generated after use and from the process is given to the sewerage in case of a municipal sewer line. Our factories connected to the sewerage have obtained a discharge quality control license from the relevant municipality. A sample is taken every 6 months by the municipality officials, and the analysis values are appropriate. Within the scope of the Turkish Environmental permit and license regulation, the wastewater is treated in the treatment system in our factories and works in accordance with the limit values specified in the water pollution control regulation. In order to determine the effluent quality, KOI, BOI, PH and AKM analyzes are performed by accredited laboratories at the frequencies specified in the relevant regulation. According to our treatment facility capacity, wastewater analysis is carried out by accredited laboratories every two months in some of our plants and every four months in some of our plants.
Water discharges – total volumes	Not monitored	<Not Applicable>	<Not Applicable>	Since meters are not obligatory in wastewater discharges due to Turkish environmental legislation, there is no data record on wastewater outputs. Calculation of wastewater is calculated by assumptions and calculation method. In order to determine the amount of discharged wastewater, output meters will be added to our investment CAPEX plans and wastewater discharge amounts will be determined
Water discharges – volumes by destination	Not monitored	<Not Applicable>	<Not Applicable>	Since meters are not obligatory in wastewater discharges due to Turkish environmental legislation, there is no data record on wastewater outputs. Calculation of wastewater is calculated by assumptions and calculation method. In order to determine the amount of discharged wastewater, output meters will be added to our investment CAPEX plans and wastewater discharge amounts will be determined
Water discharges – volumes by treatment method	Not monitored	<Not Applicable>	<Not Applicable>	There are biological package treatment plants for domestic wastewater in our factories. The treated wastewater is discharged to the dry stream. In our factories with a municipal sewer line, domestic wastewater is discharged into the sewer line. There are settling pools for the purification of surface waters. The treated surface water is used for dedusting and irrigation in the facility. Since the water used in the process is used in high temperature cooling processes, it evaporates to a large extent. Since meters are not obligatory in wastewater discharges due to Turkish environmental legislation, there is no data record on wastewater outputs. Calculation of wastewater is calculated by assumptions and calculation method. In order to determine the amount of discharged wastewater, output meters will be added to our investment CAPEX plans and wastewater discharge amounts will be determined.
Water discharge quality – by standard effluent parameters	100%	Monthly	According to our treatment plant capacity, wastewater analysis is completed every two months in some of our plants and every four months in some of our plants.	Standard effluent parameters are measured regularly according to our regulation about wastewater treatment. In our factories, the waste water generated after use and from the process is given to the sewerage in case of a municipal sewer line. Our factories connected to the sewerage have obtained a discharge quality control license from the relevant municipality. A sample is taken every 6 months by the municipality officials, and the analysis values are appropriate. Within the scope of the Turkish Environmental permit and license regulation, the wastewater is treated in the treatment system in our factories and works in accordance with the limit values specified in the water pollution control regulation. In order to determine the effluent quality, KOI, BOI, PH and AKM analyzes are performed by accredited laboratories at the frequencies specified in the relevant regulation.
Water discharge quality – emissions to water (nitrites, phosphates, pesticides, and/or other priority substances)	100%	Monthly	According to our treatment plant capacity, wastewater analysis is completed every two months in some of our plants and every four months in some of our plants.	Receiving environment standards defined by relevant regulations also act as restrictive for maintaining the quality of water bodies. On the other hand, in the Water Pollution Control Regulation (OG dated 31.12.2004 and numbered 25687) prepared and in force for the protection of water bodies in our country, the limit value for any pesticide type is not included in the receiving environment discharge standards. Although there is no limit value in Turkish legislation, chlorination is carried out in our factories in order to purify the drinking water and to prevent the formation of living things such as bacteria and viruses. With the chlorine pump control chart, reverse osmosis inlet and outlet waters are monitored. In order to determine the effluent quality, KOI, BOI, PH and AKM analyzes are performed by accredited laboratories at the frequencies specified in the relevant regulation.
Water discharge quality – temperature	Not monitored	<Not Applicable>	<Not Applicable>	Since the water used in mills and rotary kiln bed cooling in our factories is in the closed circuit system, there is no water loss. Water is lost only as a result of evaporation. It is added from the well to replace the lost water. Surface water, on the other hand, is collected in sedimentation ponds with the help of the drainage system and after being treated, it is used in dedusting works, road washings and irrigation at the facility. Domestic wastewater is treated at the biological package treatment plant and discharged to a dry stream or given to the municipal sewage. Therefore, there is no system at the wastewater outlet that affects the wastewater temperature.
Water consumption – total volume	100%	Monthly	Water consumptions are determined monthly by meter indices in the processes.	Water consumptions are determined monthly by meter indices in the processes. The counter indices are established in the processes and their measurements are made. The values read are forwarded to the sustainability and climate change directorate and evaluated. They are monitored in units such as rotary kiln cooling tower, raw meal mill, clinker cooling, technological pool, boiler room, lodgings, hydrant line, water jet. Next year, we plan to establish a water management platform within the scope of environmental, social and corporate governance practices, green reconciliation and clean production practices, and the European water framework directive. Depending on this platform, our aim will be leak detection, daily, weekly and monthly reports, consumption analysis, full-time water consumption monitoring via the online platform.
Water recycled/reused	Not monitored	<Not Applicable>	<Not Applicable>	Since the water sources in the cooling processes are used as a closed loop, it has a high recovery rate. The wastewater released during the cement production process is collected in pools and recycled after settling and leaching processes. The recovered water is used for dedusting, road washing and irrigation at the facility.
The provision of fully-functioning, safely managed WASH services to all workers	100%	Quarterly	All of our employees are provided with healthy water consumption conditions specified within the scope of the ISO 45001 standard regarding health services. Accordingly, biological water analyzes are carried out at 3-month intervals and chemical water analyzes are performed at 6-month intervals in our factories.	All of our employees are provided with healthy water consumption conditions specified within the scope of the ISO 45001 standard regarding health services. Accordingly, biological water analyzes are carried out at 3-month intervals and chemical water analyzes are performed at 6-month intervals in our factories. To get rid of disease-causing microorganisms, the municipal water is disinfected.

(W1.2b) What are the total volumes of water withdrawn, discharged, and consumed across all your operations, how do they compare to the previous reporting year, and how are they forecasted to change?

	Volume (megaliters/year)	Comparison with previous reporting year	Primary reason for comparison with previous reporting year	Five-year forecast	Primary reason for forecast	Please explain
Total withdrawals	1203	About the same	Increase/decrease in business activity	About the same	Increase/decrease in business activity	The total amount of water withdrawn from the wells of all our factories in 2022 is calculated as megaliters/year. Compared to the first reporting year, the amount of water withdrawal is almost the same.
Total discharges	231	About the same	Increase/decrease in business activity	About the same	Increase/decrease in business activity	The total amount of water discharges of all our factories in 2022 is calculated as megaliters/year. Compared to the first reporting year, the amount of water discharges are almost the same
Total consumption	1203	About the same	Increase/decrease in business activity	About the same	Increase/decrease in business activity	The total amount of water consumption from the wells of all our factories in 2022 is calculated as megaliters/year. Compared to the first reporting year, the amount of water consumption is almost the same

W1.2d

(W1.2d) Indicate whether water is withdrawn from areas with water stress, provide the proportion, how it compares with the previous reporting year, and how it is forecasted to change.

	Withdrawals are from areas with water stress	% withdrawn from areas with water stress	Comparison with previous reporting year	Primary reason for comparison with previous reporting year	Five-year forecast	Primary reason for forecast	Identification tool	Please explain
Row 1	Yes	26-50	About the same	Increase/decrease in business activity	About the same	Increase/decrease in business activity	WWF Water Risk Filter	<p>According to WWF Water Risk Filter; Our Plants located in Şanlıurfa and Kilis have a very high risk of water stress.</p> <p>As Limak Cement group, we are working to use water resources more efficiently and not to face any water scarcity problem in the future. In this regard, we provide training to our employees on efficient use of resources and water management. In order to keep track of the amount of water drawn from the well, we place meters in all our wells to monitor them and look for ways to reduce water use.</p> <p>To give an example of our efforts to reduce water consumption as the Limak cement group;</p> <p>For our Anka factory;</p> <p>Backwash water is collected and used in the clinker cooling water spray system. Blowdown water of the bed cooling water pool will be collected and given to the clinker cooling water spray system. Meters will be installed and monitored for area irrigation, garden/lawn irrigation. There are batteries with sensors at the water consumption points of the Operation Building. Blue collar bathroom sinks will also be provided.</p> <p>For our Balıkesir factory;</p> <p>It was filling water from the water booster line with a meter in front of the warehouse to irrigate with the water truck belonging to the contractor company for dedusting the Storage yard. Then, instead of this process, the waste water of the technological pool was collected in the big pool, and a new water line was drawn from here, the water truck was filled with this water and the blowdown water utilization process has started. The amount of savings in the first 5 months of 2023 is 4,431 m3.</p> <p>For our Kurtalan Factory;</p> <p>The need for water to be used in the compressors will be reduced, as the main compressor (GA 250) to be connected will be air-cooled.</p> <p>One of the existing water-cooled compressors (GA160) was replaced with an air-cooled compressor, reducing the thermal load on the process water, and the system was improved by reducing the evaporation loss in the process water and the amount of new water added.</p> <p>For our Trakya Factory;</p> <p>In the past, sensor equipment was installed at the water consumption points in the guest house area. The same process can be done for operation and Admin buildings. Cost and suitability research will be conducted on the subject.</p> <p>Studies in areas with water stress;</p> <p>In our Kilis factory, studies are carried out to minimize the problem of water stress and reduce water consumption. A new 20 m3 capacity water tank has been placed to collect the backwash water coming out of the sand filter and water softening system. A system has been set up to transfer the water to the water tank with the help of the pump, and the field and quarry dedusting has been completed in this way. In addition, a new rainwater collection pool with a capacity of 388 m3 was built next to the coal stock area.</p> <p>In our Şanlıurfa plant, Backwash water coming out of the sand filter and water softening systems is stored and used when needed to dedust the mines where the raw material comes from and to fill the fire truck. Thus, 12 m³/day savings are achieved. It is also planned to work on issues such as the use of photocell and energy saving faucets in the common areas, and the capacity arrangements of siphon reservoir capacities suitable for use. Also, backwash water of 2 Rotary filters used in the technological water line is stored to be used for filling the water truck and filling the fire truck. Thus, 2m³/day is saved.</p>

W1.2h

(W1.2h) Provide total water withdrawal data by source.

	Relevance	Volume (megaliters/year)	Comparison with previous reporting year	Primary reason for comparison with previous reporting year	Please explain
Fresh surface water, including rainwater, water from wetlands, rivers, and lakes	Not relevant	<Not Applicable>	<Not Applicable>	<Not Applicable>	Water is not supplied from surface waters such as wetlands and lakes. Rain water is collected by the drainage system and conveyed to the sedimentation ponds, where it is used for dedusting and irrigation processes after being treated.
Brackish surface water/Seawater	Not relevant	<Not Applicable>	<Not Applicable>	<Not Applicable>	Water is not supplied from sources such as brackish water and seawater.
Groundwater – renewable	Relevant	1203	About the same	Increase/decrease in business activity	The amount of water supply from renewable groundwater for all of our plants in 2022 is calculated as megaliters/year. Compared to the first reporting year, the amount of water withdrawal is almost the same.
Groundwater – non-renewable	Not relevant	<Not Applicable>	<Not Applicable>	<Not Applicable>	There is no water supply from the non-renewable underground water well.
Produced/Entrained water	Not relevant	<Not Applicable>	<Not Applicable>	<Not Applicable>	There is no use of produced water.
Third party sources	Not relevant	<Not Applicable>	<Not Applicable>	<Not Applicable>	

W1.2k**(W1.2k) Provide details of your organization's emissions of nitrates, phosphates, pesticides, and other priority substances to water in the reporting year.**

	Emissions to water in the reporting year (metric tonnes)	Category(ies) of substances included	List the specific substances included	Please explain
Row 1	0	Please select	<Not Applicable>	Receiving environment standards defined by relevant regulations also act as restrictive for maintaining the quality of water bodies. On the other hand, in the Water Pollution Control Regulation (OG dated 31.12.2004 and numbered 25687) prepared and in force for the protection of water bodies in our country, the limit value for any pesticide type is not included in the receiving environment discharge standards. Although there is no limit value in Turkish legislation, chlorination is carried out in our factories in order to purify the drinking water and to prevent the formation of living things such as bacteria and viruses. With the chlorine pump control chart, reverse osmosis inlet and outlet waters are monitored.

W1.3**(W1.3) Provide a figure for your organization's total water withdrawal efficiency.**

	Revenue	Total water withdrawal volume (megaliters)	Total water withdrawal efficiency	Anticipated forward trend
Row 1	51477289	1218	42263.7840722496	In the coming years, we are making plans that will increase the total water withdrawal quality and enable us to use water resources more efficiently. We plan to establish a water management platform within the scope of ESG practices, green reconciliation and clean production practices, and the European water framework directive.

W1.4**(W1.4) Do any of your products contain substances classified as hazardous by a regulatory authority?**

	Products contain hazardous substances	Comment
Row 1	No	Cement production is carried out in our factories. Cement is basically defined as a hydraulic binder material obtained by grinding a mixture of natural limestone stones and clay after heating at high temperature.

W1.5**(W1.5) Do you engage with your value chain on water-related issues?**

	Engagement	Primary reason for no engagement	Please explain
Suppliers	Yes	<Not Applicable>	<Not Applicable>
Other value chain partners (e.g., customers)	Yes	<Not Applicable>	<Not Applicable>

W1.5a

(W1.5a) Do you assess your suppliers according to their impact on water security?

Row 1

Assessment of supplier impact

No, we do not currently assess the impact of our suppliers, but we plan to do so within the next two years

Considered in assessment

<Not Applicable>

Number of suppliers identified as having a substantive impact

<Not Applicable>

% of total suppliers identified as having a substantive impact

<Not Applicable>

Please explain

As Limak Cement, we adopt sustainability as a business model and strive to fulfill our responsibility for our planet and sustainable life in the best way possible. In this context, a sustainability survey was conducted for all our stakeholders in order to determine the priorities of our sustainability strategies. For example, a survey was conducted with 154 internal stakeholders and 79 external stakeholders. Online trainings have been determined through the Limak Cement Academy system in order to help our stakeholders adopt the most important sustainability issues today and in the future. Trainings will be given in 2023.

W1.5b

(W1.5b) Do your suppliers have to meet water-related requirements as part of your organization's purchasing process?

	Suppliers have to meet specific water-related requirements	Comment
Row 1	No, but we plan to introduce water-related requirements within the next two years	As Limak Cement, we adopt sustainability as a business model and strive to fulfill our responsibility for our planet and sustainable life in the best way possible. In this context, a sustainability survey was conducted for all our stakeholders in order to determine the priorities of our sustainability strategies. For example, a survey was conducted with 154 internal stakeholders and 79 external stakeholders. Online trainings have been determined through the Limak Cement Academy system in order to help our stakeholders adopt the most important sustainability issues today and in the future. Trainings will be given in 2023.

W1.5d

(W1.5d) Provide details of any other water-related supplier engagement activity.

Type of engagement

Incentivization

Details of engagement

Incentivize demonstrable progress against targets on water withdrawals in your supplier relationship management

Incentivize demonstrable progress against targets on water pollution in your supplier relationship management

% of suppliers by number

1-25

% of suppliers with a substantive impact

<Not Applicable>

Rationale for your engagement

Impact of the engagement and measures of success

As Limak Cement, we adopt sustainability as a business model and strive to fulfill our responsibility for our planet and sustainable life in the best way possible. In this context, a sustainability survey was conducted for all our stakeholders in order to determine the priorities of our sustainability strategies. For example, a survey was conducted with 154 internal stakeholders and 79 external stakeholders. Online trainings have been determined through the Limak Cement Academy system in order to help our stakeholders adopt the most important sustainability issues today and in the future. Trainings will be given in 2023.

Comment

W1.5e

(W1.5e) Provide details of any water-related engagement activity with customers or other value chain partners.

Type of stakeholder

Investors & shareholders

Type of engagement

Education / information sharing

Details of engagement

Educate and work with stakeholders on understanding and measuring exposure to water-related risks

Run an engagement campaign to educate stakeholders about your water-related performance and strategy

Rationale for your engagement

As Limak Cement, we adopt sustainability as a business model and strive to fulfill our responsibility for our planet and sustainable life in the best way possible. In this context, a sustainability survey was conducted for all our stakeholders in order to determine the priorities of our sustainability strategies. For example, a survey was conducted with 154 internal stakeholders and 79 external stakeholders. Online trainings have been determined through the Limak Cement Academy system in order to help our stakeholders adopt the most important sustainability issues today and in the future. Trainings will be given in 2023.

Impact of the engagement and measures of success

W2. Business impacts

W2.1

(W2.1) Has your organization experienced any detrimental water-related impacts?

No

W2.2

(W2.2) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for water-related regulatory violations?

	Water-related regulatory violations	Fines, enforcement orders, and/or other penalties	Comment
Row 1	No	<Not Applicable>	

W3. Procedures

W3.1

(W3.1) Does your organization identify and classify potential water pollutants associated with its activities that could have a detrimental impact on water ecosystems or human health?

	Identification and classification of potential water pollutants	How potential water pollutants are identified and classified	Please explain
Row 1	Yes, we identify and classify our potential water pollutants	Receiving environment standards defined by relevant regulations also act as restrictive for maintaining the quality of water bodies. On the other hand, in the Water Pollution Control Regulation (OG dated 31.12.2004 and numbered 25687) prepared and in force for the protection of water bodies in our country, the limit value for any pesticide type is not included in the receiving environment discharge standards. Although there is no limit value in Turkish legislation, chlorination is carried out in our factories in order to purify the drinking water and to prevent the formation of living things such as bacteria and viruses. With the chlorine pump control chart, reverse osmosis inlet and outlet waters are monitored. In our plants, the waste water generated after use and from the process is given to the sewerage in case of a municipal sewer line. Our factories connected to the sewerage have obtained a discharge quality control license from the relevant municipality. A sample is taken every 6 months by the municipality officials, and the analysis values are appropriate. Within the scope of the Turkish Environmental permit and license regulation, the wastewater is treated in the treatment system in our factories and works in accordance with the limit values specified in the water pollution control regulation. In order to determine the effluent quality, KOl, BOI, PH and AKM analyzes are performed by accredited laboratories at the frequencies specified in the relevant regulation.	<Not Applicable>

W3.1a

(W3.1a) Describe how your organization minimizes the adverse impacts of potential water pollutants on water ecosystems or human health associated with your activities.

Water pollutant category

Other, please specify

Description of water pollutant and potential impacts

Receiving environment standards defined by relevant regulations also act as restrictive for maintaining the quality of water bodies. On the other hand, in the Water Pollution Control Regulation (OG dated 31.12.2004 and numbered 25687) prepared and in force for the protection of water bodies in our country, the limit value for any pesticide type is not included in the receiving environment discharge standards. Although there is no limit value in Turkish legislation, chlorination is carried out in our factories in order to purify the drinking water and to prevent the formation of living things such as bacteria and viruses. With the chlorine pump control chart, reverse osmosis inlet and outlet waters are monitored.

Value chain stage

Direct operations

Actions and procedures to minimize adverse impacts

Assessment of critical infrastructure and storage condition (leakages, spillages, pipe erosion etc.) and their resilience

Beyond compliance with regulatory requirements

Water recycling

Please explain

In our factories, the waste water generated after use and from the process is given to the sewerage in case of a municipal sewer line. Our factories connected to the sewerage have obtained a discharge quality control license from the relevant municipality. A sample is taken every 6 months by the municipality officials, and the analysis values are appropriate. Within the scope of the Turkish Environmental permit and license regulation, the wastewater is treated in the treatment system in our factories and works in accordance with the limit values specified in the water pollution control regulation. In order to determine the effluent quality, KOI, BOI, PH and AKM analyzes are performed by accredited laboratories at the frequencies specified in the relevant regulation.

W3.3

(W3.3) Does your organization undertake a water-related risk assessment?

No, water risks-related are not assessed

W3.3c

(W3.3c) Why does your organization not undertake a water-related risk assessment?

	Primary reason	Please explain
Row 1	We are planning to introduce a risk assessment process within the next two years	Currently, SWOT Analysis method is applied in all our plants on water management issues. According to this method, the weaknesses and threats of water and other environmental factors are handled separately and possible risks are determined. After the risks are determined, the risk and opportunities table is filled. Measures to be implemented are determined and additional measures are expanded if necessary. The risk assessment method is defined in the risk opportunity assessment procedure and the decision matrix is applied. As Limak Cement Group, we have set targets to reduce the water used per cubic meter/ton for cement production. In order to achieve these targets, we make monthly controls. In this direction, water-related risks in our factories will be reviewed and studies will be expanded so that water risk analysis can be carried out. We are engaged in talks with the managers in our factories regarding the subject.

W4. Risks and opportunities

W4.1

(W4.1) Have you identified any inherent water-related risks with the potential to have a substantive financial or strategic impact on your business?

Yes, only within our direct operations

W4.1a

(W4.1a) How does your organization define substantive financial or strategic impact on your business?

As Limak Cement Group, SWOT Analysis method is applied on water management issues. This method deals with the natural risks associated with water. Budget agendas for water pollution and control are created for emerging risks. Actual budget items: Drinking water treatment expenses (such as pump, filter, chlorine, UV light), sewage and settling pool expenses (maintenance, repair, cleaning, technical report), well water and drinking water analysis, well water pump maintenance. The budget allocated for 2022 is 6.745.835,67 TL. In line with the water management standard requirement, which covers the activities and processes of the Limak Cement group locations, the important financial and strategic effects on the enterprise are defined as follows; Any impact that affects business activities and the system, disrupts business continuity and disrupts work. However, our company performs this process under more than one category while making a risk assessment. For example; all of our employees, visitors, subcontractor employees, supplier personnel from whom service is purchased, all related parties, risks that may arise and/or have potential during their activities within the enterprise.

W4.1b

(W4.1b) What is the total number of facilities exposed to water risks with the potential to have a substantive financial or strategic impact on your business, and what proportion of your company-wide facilities does this represent?

	Total number of facilities exposed to water risk	% company-wide facilities this represents	Comment
Row 1	2	26-50	<p>Our Kilis Cement Factory operating in Polateli, Kilis Region and our Şanlıurfa Cement Factory operating in Karaköprü, Şanlıurfa region are located in the region exposed to water risks according to the WWF Water scarcity report. Water is supplied from wells, and in this context, training on water management and water pollution is given to the staff in order to use water resources more efficiently. A target has been set to reduce the process water used in cement production, and the monthly monitoring of the water used per cubic meter/ton of cement is ensured and it is aimed to be reduced. Process-based studies are carried out to reduce the water used. In addition, since there is no sewerage line for the discharge of wastewater generated in our facilities, the used water is conveyed to the package treatment unit, where it is discharged to the receiving environment after biological treatment. This has a significant financial impact on our businesses.</p> <p>The following studies have been made for our factories experiencing water stress;</p> <p>In our Kilis factory, studies are carried out to minimize the problem of water stress and reduce water consumption. A new 20 m3 capacity water tank has been placed to collect the backwash water coming out of the sand filter and water softening system. A system has been set up to transfer the water to the water tank with the help of the pump, and the field and quarry dedusting has been completed in this way. In addition, a new rainwater collection pool with a capacity of 388 m3 was built next to the coal stock area.</p> <p>In our Şanlıurfa plant, Backwash water coming out of the sand filter and water softening systems is stored and used when needed to dedust the mines where the raw material comes from and to fill the fire truck. Thus, 12 m³/day savings are achieved. It is also planned to work on issues such as the use of photocell and energy saving faucets in the common areas, and the capacity arrangements of siphon reservoir capacities suitable for use. Also, backwash water of 2 Rotary filters used in the technological water line is stored to be used for filling the water truck and filling the fire truck. Thus, 2m³/day is saved</p>

W4.1c

(W4.1c) By river basin, what is the number and proportion of facilities exposed to water risks that could have a substantive financial or strategic impact on your business, and what is the potential business impact associated with those facilities?

Country/Area & River basin

Turkey	Asi (Orontes)
--------	---------------

Number of facilities exposed to water risk

1

% company-wide facilities this represents

1-25

Production value for the metals & mining activities associated with these facilities

<Not Applicable>

% company's annual electricity generation that could be affected by these facilities

<Not Applicable>

% company's global oil & gas production volume that could be affected by these facilities

<Not Applicable>

% company's total global revenue that could be affected

31-40

Comment

Our Kilis Cement factory, which is a Limak Cement establishment, has an important share in terms of export and import. In the cement production process, water is used for temperature control for dry systems. (Bed cooling, closed circuit water cooling systems, etc.) The water used for gas cooling is used in gas cooling towers and mills. If the water supply is interrupted, these processes will be out of operation and production will be interrupted. The inactivity of production and the search for new water resources cause an increase in operating costs.

Country/Area & River basin

Turkey	Other, please specify (Dicle Firat Basin)
--------	---

Number of facilities exposed to water risk

1

% company-wide facilities this represents

1-25

Production value for the metals & mining activities associated with these facilities

<Not Applicable>

% company's annual electricity generation that could be affected by these facilities

<Not Applicable>

% company's global oil & gas production volume that could be affected by these facilities

<Not Applicable>

% company's total global revenue that could be affected

21-30

Comment

Our Şanlıurfa Cement factory, which is a Limak Cement establishment, has an important share in terms of export and import. In the cement production process, water is used for temperature control for dry systems. (Bed cooling, closed circuit water cooling systems, etc.) The water used for gas cooling is used in gas cooling towers and mills. If the water supply is interrupted, these processes will be out of operation and production will be interrupted. The inactivity of production and the search for new water resources cause an increase in operating costs.

W4.2

(W4.2) Provide details of identified risks in your direct operations with the potential to have a substantive financial or strategic impact on your business, and your response to those risks.

Country/Area & River basin

Turkey	Asi (Orontes)
--------	---------------

Type of risk & Primary risk driver

Acute physical	Drought
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Primary potential impact

Increased operating costs

Company-specific description

Studies were done at our Kilis plant in order to take an important step towards protecting and improving existing water resources by transitioning to the green recovery process and implementing nature-based multi-solution applications.

Our Kilis factory is located in the Asi basin. In the WWF Water scarcity report, it is stated that there will be water scarcity in the basin in the long term. This risk is considered

as an important problem. As a result of water scarcity, the search for new water resources will begin, which will increase operating costs. In the Asi Basin Drought Analysis Report published by Artvin Coruh University in 2019, the drought risk was investigated for the Asi basin. In the search, it was observed that there is an increasing trend in the Asi Basin, although it is not statistically significant, at the 95% confidence level from the annual total precipitation. On the other hand, it is stated that there is a clear trend of increase in annual average temperatures both in sub-basin and basin basis.

Timeframe

More than 6 years

Magnitude of potential impact

Medium-low

Likelihood

Very likely

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact figure (currency)

4787667

Potential financial impact figure - minimum (currency)

<Not Applicable>

Potential financial impact figure - maximum (currency)

<Not Applicable>

Explanation of financial impact

In the cement production process, water is used for temperature control for dry systems. (Bed cooling, closed water cooling systems, etc.) The water used for gas cooling is used in gas cooling towers and mills. If the water supply is interrupted, these processes will be out of operation and production will be interrupted. The inactivity of production and the search for new water resources cause an increase in operating costs. This is approximately 4.787.667 TL.

Primary response to risk

Adopt water efficiency, water reuse, recycling and conservation practices

Description of response

The SWOT Analysis method has been applied on issues related to water management and the risks related to water have been discussed. In order to minimize the emerging risks, improvement and feasibility reports are prepared. The investment is added to the CAPEX plan. Water pollution and control budget agendas for 2022 have been established. Actual budget items: Drinking water treatment expenses (such as pump, filter, chlorine, UV light), sewage and settling pool expenses (maintenance, repair, cleaning, technical report), well water and drinking water analysis, well water pump maintenance. The actual budget cost for 2022 is 6.745.835,67 TL.

Cost of response

Explanation of cost of response

Our 2022 Water footprint report of all our integrated cement factories has been verified by a 3rd party verification body according to ISO 14046:2014 Standard. A technical report has been prepared for the water management of the year 2022 and a second settling pool mentioned in the 2021 water report. In section W1.2d, water management investments made in 2022 are mentioned.

In the control of Water Pollution, the maintenance and repair costs of the settling pools, the maintenance and repair costs of the rainwater and surface water line, the meter costs, the well water pump maintenance costs are handled.

Country/Area & River basin

Turkey	Other, please specify (Dicle Firat)
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Type of risk & Primary risk driver

Acute physical	Drought
----------------	---------

Primary potential impact

Increased operating costs

Company-specific description

Our Şanlıurfa factory is located in the Tigris Euphrates basin. In the WWF Water scarcity report, it is stated that there will be water scarcity in the basin in the long term. This risk is considered as an important problem. As a result of water scarcity, the search for new water resources will begin, which will increase operating costs. According to the Dicle-Euphrates Basin drought management plan, it is stated that the Euphrates and Tigris basins will be the basin that will be most affected by climate change.

Timeframe

More than 6 years

Magnitude of potential impact

Medium

Likelihood

Very likely

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact figure (currency)

4713672

Potential financial impact figure - minimum (currency)

<Not Applicable>

Potential financial impact figure - maximum (currency)

<Not Applicable>

Explanation of financial impact

In the cement production process, water is used for temperature control for dry systems. (Bed cooling, closed water cooling systems, etc.) The water used for gas cooling is used in gas cooling towers and mills. If the water supply is interrupted, these processes will be out of operation and production will be interrupted. The inactivity of production and the search for new water resources cause an increase in operating costs. This is approximately 4.713.672 TL.

Primary response to risk

Adopt water efficiency, water reuse, recycling and conservation practices

Description of response

Our 2022 Water footprint report of all our integrated cement factories has been verified by a 3rd party verification body according to ISO 14046:2014 Standard. A technical report has been prepared for the water management of the year 2022 and a second settling pool mentioned in the previous year water security report.

The SWOT Analysis method has been applied on issues related to water management and the risks related to water have been discussed. In order to minimize the emerging risks, improvement and feasibility reports are prepared. The investment is added to the CAPEX plan. Water pollution and control budget agendas for 2022 have been established. Actual budget items: Drinking water treatment expenses (such as pump, filter, chlorine, UV light), sewage and settling pool expenses (maintenance, repair, cleaning, technical report), well water and drinking water analysis, well water pump maintenance. The actual budget cost for 2022 is 6.745.835,67 TL.

Cost of response

Explanation of cost of response

Our 2022 Water footprint report of all our integrated cement factories has been verified by a 3rd party verification body according to ISO 14046:2014 Standard. A technical report has been prepared for the water management of the year 2022 and a second settling pool mentioned in the previous year water security report.

In the control of Water Pollution, the maintenance and repair costs of the settling pools, the maintenance and repair costs of the storm water and surface water line, the meter costs, the well water pump maintenance costs are handled. Investments made are mentioned in section W1.2d.

W4.2c

(W4.2c) Why does your organization not consider itself exposed to water risks in its value chain (beyond direct operations) with the potential to have a substantive financial or strategic impact?

	Primary reason	Please explain
Row 1	Evaluation in progress	As Limak Cement, we adopt sustainability as a business model and strive to fulfill our responsibility for our planet and sustainable life in the best way possible. In this context, a sustainability survey was conducted for all our stakeholders in order to determine the priorities of our sustainability strategies that we realized in 2022. For example, a survey was conducted with 154 internal stakeholders and 79 external stakeholders. Online trainings have been determined through the Limak Cement Academy system in order to help our stakeholders adopt the most important sustainability issues today and in the future. Trainings will be given in 2023. Studies are planned on behalf of our companies in our supply chain in order to achieve sustainable water management in our Kilis and Şanlıurfa Plants, which have water scarcity. The fact that our supplier companies experience water-related problems will directly affect our operations. In order to prevent this and to avoid problems in production, studies will be planned to prevent or reduce the problems that our suppliers will encounter in water-related issues.

W4.3

(W4.3) Have you identified any water-related opportunities with the potential to have a substantive financial or strategic impact on your business?

Yes, we have identified opportunities, and some/all are being realized

W4.3a

(W4.3a) Provide details of opportunities currently being realized that could have a substantive financial or strategic impact on your business.

Type of opportunity

Efficiency

Primary water-related opportunity

Water recovery from sewage management

Company-specific description & strategy to realize opportunity

In our factories, there is a gradual settling pool for the collection of surface water in the areas where the packaging unit is located. Suspended solids in the surface water coming into the pool are removed and the rinsed water is drawn with a pump and used for irrigation of impermeable concrete floors. There is a gradual settling pool for the collection of surface waters in the coal stock area. The suspended solids in the surface water coming into the pool are removed and the rinsed water is drawn by the pump and sprayed to the coal stock area and used back. The water reuse opportunity prevents additional water use for field irrigation or spraying operations. In this way, water wastage is prevented.

Estimated timeframe for realization

Current - up to 1 year

Magnitude of potential financial impact

Medium

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact figure (currency)

1286568

Potential financial impact figure – minimum (currency)

<Not Applicable>

Potential financial impact figure – maximum (currency)

<Not Applicable>

Explanation of financial impact

Under favour of the water recycling opportunity we have created in our factories, we reduce water consumption, prevent water waste and reduce water-related costs.

W5. Facility-level water accounting

W5.1

(W5.1) For each facility referenced in W4.1c, provide coordinates, water accounting data, and a comparison with the previous reporting year.

Facility reference number

Facility 1

Facility name (optional)

Limak Cement Industry and Trade Inc. Kilis Cement Plant

Country/Area & River basin

Turkey	Asi (Orontes)
--------	---------------

Latitude

36.799563

Longitude

37.021168

Located in area with water stress

Yes

Primary power generation source for your electricity generation at this facility

<Not Applicable>

Oil & gas sector business division

<Not Applicable>

Total water withdrawals at this facility (megaliters/year)

179

Comparison of total withdrawals with previous reporting year

Lower

Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

Withdrawals from brackish surface water/seawater

0

Withdrawals from groundwater - renewable

179

Withdrawals from groundwater - non-renewable

0

Withdrawals from produced/entrained water

0

Withdrawals from third party sources

0

Total water discharges at this facility (megaliters/year)

33.1

Comparison of total discharges with previous reporting year

Lower

Discharges to fresh surface water

33.1

Discharges to brackish surface water/seawater

0

Discharges to groundwater

0

Discharges to third party destinations

0

Total water consumption at this facility (megaliters/year)

179

Comparison of total consumption with previous reporting year

Lower

Please explain

In our Kilis factory, studies are carried out to minimize the problem of water stress and reduce water consumption. A new 20 m3 capacity water tank has been placed to collect the backwash water coming out of the sand filter and water softening system. A system has been set up to transfer the water to the water tank with the help of the pump, and the field and quarry dedusting has been completed in this way. In addition, a new rainwater collection pool with a capacity of 388 m3 was built next to the coal stock area.

Facility reference number

Facility 2

Facility name (optional)

Limak Cement Industry and Trade Inc. Şanlıurfa Cement Plant

Country/Area & River basin

Turkey	Other, please specify (Dicle Firat Basin)
--------	---

Latitude

37.2789

Longitude

38.7318

Located in area with water stress

Yes

Primary power generation source for your electricity generation at this facility

<Not Applicable>

Oil & gas sector business division

<Not Applicable>

Total water withdrawals at this facility (megaliters/year)

119

Comparison of total withdrawals with previous reporting year

Lower

Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

Withdrawals from brackish surface water/seawater

0

Withdrawals from groundwater - renewable

119

Withdrawals from groundwater - non-renewable

0

Withdrawals from produced/entrained water

0

Withdrawals from third party sources

0

Total water discharges at this facility (megaliters/year)

26.6

Comparison of total discharges with previous reporting year

Lower

Discharges to fresh surface water

26.6

Discharges to brackish surface water/seawater

0

Discharges to groundwater

0

Discharges to third party destinations

0

Total water consumption at this facility (megaliters/year)

119

Comparison of total consumption with previous reporting year

Lower

Please explain

In our Şanlıurfa plant, Backwash water coming out of the sand filter and water softening systems is stored and used when needed to dedust the mines where the raw material comes from and to fill the fire truck. Thus, 12 m³/day savings are achieved. It is also planned to work on issues such as the use of photocell and energy saving faucets in the common areas, and the capacity arrangements of siphon reservoir capacities suitable for use. Also, backwash water of 2 Rotary filters used in the technological water line is stored to be used for filling the water truck and filling the fire truck. Thus, 2m³/day is saved.

W5.1a

(W5.1a) For the facilities referenced in W5.1, what proportion of water accounting data has been third party verified?

Water withdrawals – total volumes

% verified

76-100

Verification standard used

Water footprint report for all of our integrated plats has been verified by a accredited 3rd party verification body according to ISO 14046 :2014 Standard.

Please explain

<Not Applicable>

Water withdrawals – volume by source

% verified

76-100

Verification standard used

Water footprint report for all of our integrated plats has been verified by a accredited 3rd party verification body according to ISO 14046 :2014 Standard.

Please explain

<Not Applicable>

Water withdrawals – quality by standard water quality parameters

% verified

76-100

Verification standard used

Water footprint report for all of our integrated plats has been verified by a accredited 3rd party verification body according to ISO 14046 :2014 Standard.

Please explain

<Not Applicable>

Water discharges – total volumes

% verified

76-100

Verification standard used

Water footprint report for all of our integrated plats has been verified by a accredited 3rd party verification body according to ISO 14046 :2014 Standard.

Please explain

<Not Applicable>

Water discharges – volume by destination

% verified

76-100

Verification standard used

Water footprint report for all of our integrated plats has been verified by a accredited 3rd party verification body according to ISO 14046 :2014 Standard.

Please explain

<Not Applicable>

Water discharges – volume by final treatment level

% verified

76-100

Verification standard used

Water footprint report for all of our integrated plats has been verified by a accredited 3rd party verification body according to ISO 14046 :2014 Standard.

Please explain

<Not Applicable>

Water discharges – quality by standard water quality parameters

% verified

76-100

Verification standard used

Water footprint report for all of our integrated plats has been verified by a accredited 3rd party verification body according to ISO 14046 :2014 Standard.

Please explain

<Not Applicable>

Water consumption – total volume

% verified

76-100

Verification standard used

Water footprint report for all of our integrated plats has been verified by a accredited 3rd party verification body according to ISO 14046 :2014 Standard.

Please explain

<Not Applicable>

W6. Governance

W6.1

(W6.1) Does your organization have a water policy?

Yes, we have a documented water policy that is publicly available

W6.1a

(W6.1a) Select the options that best describe the scope and content of your water policy.

	Scope	Content	Please explain
Row 1	Company-wide	Commitment to align with international frameworks, standards, and widely-recognized water initiatives Commitment to prevent, minimize, and control pollution Commitment to reduce water withdrawal and/or consumption volumes in direct operations Commitment to reduce water withdrawal and/or consumption volumes in supply chain Commitment to stakeholder education and capacity building on water security Commitment to the conservation of freshwater ecosystems Reference to company water-related targets Recognition of environmental linkages, for example, due to climate change	In order to leave a livable world to future generations, protection of natural water resources, reduction of water consumption, water recycling and reuse within the scope of water management; Within the scope of energy management, actions are taken to reduce energy consumption, increase energy efficiency and encourage the use of renewable energy sources as much as possible. Increasing profitability and competitiveness through cost-reducing practices and continuous improvements in inputs by using resources in the most efficient way is among our main goals. As Limak Cement Group, our integrated management system policy open to the public is ISO 45001 occupational health and safety management, ISO 14001 Environmental Management, ISO 9001 Quality Management and ISO 50001 Energy Management system. The policies followed on water-related issues are included in our Integrated Management System policy and encourage continuous improvement and development.

W6.2

(W6.2) Is there board level oversight of water-related issues within your organization?

Yes

W6.2a

(W6.2a) Identify the position(s) (do not include any names) of the individual(s) on the board with responsibility for water-related issues.

Position of individual or committee	Responsibilities for water-related issues
Director on board	As Limak Cement Group, water management issues are handled by the Maintenance team at our facilities, and they are followed up on a monthly basis with the objectives of the process criteria. The water parameters used in the process are followed by the production directorate. The Sustainability and Climate Change Manager, who is also the management representative, is directly responsible for water management, energy, work on reducing carbon emissions, research and all other environmental sustainability issues, and the policy followed is consolidated by the Sustainability and Climate Change unit. The investments made for water management are presented to the factory directors, the board of directors and the CEO by the Sustainability and Climate Change unit manager at monthly board meetings.
Other C-Suite Officer	The CTO is responsible for increasing energy efficiency, using alternative fuels and alternative raw materials, technological investment alternatives for less natural resource consumption, R&D projects for less carbon consumption, efficient use of water resources and alternative fuel studies in our company. Along with these studies, the CTO also takes an active role in environmental sustainability and water management.
Chief Operating Officer (COO)	It is the responsibility of the COO to ensure environmental, social and financial sustainability, to carry out studies to increase public and stakeholder awareness in the fight against climate change, making investments for the efficient use of water resources , invest in energy efficiency, renewable energy and recycling. All studies on water-related issues are included in the environmental sustainability policy.
Chief Executive Officer (CEO)	The CEO is informed by the Sustainability and Climate Change Unit Manager at monthly sustainability meetings on issues that pose a risk, require investment, and on the environment, occupational health and safety, quality and energy. The CEO is the highest level responsible for approving the appropriate projects and investments. He represents the company on environmental sustainability issues in public and international platforms. The budget to be set in order to use water resources more efficiently in our factories experiencing water stress and to prevent water shortages in the future depends directly on the approval of the CEO, and the work is reported to the CEO on a regular basis.

(W6.2b) Provide further details on the board's oversight of water-related issues.

	Frequency that water-related issues are a scheduled agenda item	Governance mechanisms into which water-related issues are integrated	Please explain
Row 1	Scheduled - some meetings	Monitoring implementation and performance Overseeing acquisitions, mergers, and divestitures Overseeing major capital expenditures Providing employee incentives Reviewing and guiding annual budgets Reviewing and guiding business plans Reviewing and guiding corporate responsibility strategy Reviewing and guiding major plans of action Reviewing and guiding risk management policies Reviewing and guiding strategy Reviewing innovation/R&D priorities Setting performance objectives	Issues related to water are discussed at monthly process criteria meetings. If there are deviations from the determined targets, the main reason is discussed at the meeting. Annually determined budgets are evaluated at the process criteria meeting and when necessary, CAPEX is created and presented to the senior management. In addition, at the monthly sustainability meetings, the company's water-related targets are revealed and how much progress has been made is discussed. In addition, in these meetings, the supporting projects developed for the efficient use of water resources are discussed and reported to the CEO. The main agenda items of the meeting are to provide incentives for employees and to raise awareness for the efficient use of water resources, as well as to review and manage the business plans that have been implemented so far and will be implemented in the future.

(W6.2d) Does your organization have at least one board member with competence on water-related issues?

	Board member(s) have competence on water-related issues	Criteria used to assess competence of board member(s) on water-related issues	Primary reason for no board-level competence on water-related issues	Explain why your organization does not have at least one board member with competence on water-related issues and any plans to address board-level competence in the future
Row 1	Yes	As Limak Cement Group, our company has members of the board of directors who are competent in water-related issues. Within the group, having knowledge of national and international standards and regulations on water management issues, having received training and experience in issues such as environmental sustainability, water treatment, efficient use of water resources, generally graduated from environmental engineering or related departments, took part in R&D studies on water-related issues. In addition, managers who can play a more active role in water management, determination of risks and measures to be taken accordingly, and who can offer faster solutions depending on their experience in water are assigned. Projects are being developed to ensure the efficient use of water and to raise awareness among all stakeholders, starting with the employees.	<Not Applicable>	<Not Applicable>

(W6.3) Provide the highest management-level position(s) or committee(s) with responsibility for water-related issues (do not include the names of individuals).

Name of the position(s) and/or committee(s)

Sustainability committee

Water-related responsibilities of this position

Please select

Frequency of reporting to the board on water-related issues

Annually

Please explain

As Limak Cement Group, the healthy planet committee on the sustainability management platform ensures that feasibility studies are carried out for the realization of sustainability goals related to water, sustainability targets are followed up and progress reports are prepared on the targets. Representatives of all our companies take part in the sustainability governance platform. Sustainability governance platform is responsible for determining strategic sustainable growth targets and submitting them to management approval, applying the sustainable approach in all activity groups and integrating it into all business processes, value propositions, corporate reputation and stakeholder communication strategies management, corporate compliance, risk, performance and motivation management, sustainability report, ensuring the publication of institutional reports such as the Global Compact Progress Report.

W6.4

(W6.4) Do you provide incentives to C-suite employees or board members for the management of water-related issues?

	Provide incentives for management of water-related issues	Comment
Row 1	No, not currently but we plan to introduce them in the next two years	Monitoring sustainability activities and performances, determining the performance indicators required for monitoring these performances, and reviewing the performance and practices within the scope of sustainability priorities, and accordingly, incentives will be provided to employees. This issue is on our agenda and will be implemented in the coming periods.

W6.5

(W6.5) Do you engage in activities that could either directly or indirectly influence public policy on water through any of the following?

Yes, direct engagement with policy makers

W6.5a

(W6.5a) What processes do you have in place to ensure that all of your direct and indirect activities seeking to influence policy are consistent with your water policy/water commitments?

The Limak cement group is aware of the fact that it is in a period where the whole world needs to work together to ensure the healthy continuity of human existence on a sustainable planet together with all the elements of nature. In this direction, it evaluates and manages all its activities by considering its business approach in three dimensions. Sustainability is built on three closely related focus areas: social people, inclusive development and healthy planet committees. The healthy planet committee aims to develop joint solutions on issues such as environmental sustainability, efficient use of water resources, energy efficiency and climate change.

A road map regarding water has been determined through the studies carried out with the committees, and as a result of the correct analysis of the water footprint, the amount of water withdrawn from nature and added to the system will be reduced by 15% until 2030. As Limak cement group, we participate in meetings and studies on issues such as environment, occupational safety, water safety and resource efficiency with the Ministry of Environment, Urbanization and Climate Change, municipalities, Universities, Turkish Cement Industrialists' Association (TÜRKÇİMENTO) and the Cement Industry Employers' Union (ÇEİS), of which we are member.

W6.6

(W6.6) Did your organization include information about its response to water-related risks in its most recent mainstream financial report?

No, but we plan to do so in the next two years

W7. Business strategy

W7.1

(W7.1) Are water-related issues integrated into any aspects of your long-term strategic business plan, and if so how?

	Are water-related issues integrated?	Long-term time horizon (years)	Please explain
Long-term business objectives	Yes, water-related issues are integrated	11-15	The 2022 water footprint reports of all our integrated cement plants has been verified by the 3rd party verification body according to ISO 14046:2014 Standard. As the Limak cement group, it is among our priority operations to constantly monitor water efficiency studies, develop them and renew the existing infrastructure in order to create the necessary infrastructure. In all of our group factories, trainings for the ISO 14046 water footprint standard were completed in 2021, and the group's near-term goals include the completion of the transition processes to the ISO 14046 water footprint standard in at least 30% of the factories. As a result of the correct analysis of the water footprint, the amount of water withdrawn from nature and added to the system will be reduced by 15% until 2030.
Strategy for achieving long-term objectives	Yes, water-related issues are integrated	11-15	Considering the perspective of continuous improvement, our strategic focus points are to make production that is safe and more respectful to the environment, to use resources in the most efficient way, to carry out activities in order to strengthen water management with our R&D group by following the appropriate scientific and technological developments and to bring the appropriate technology and to ensure the efficient use of water and to develop projects that will raise awareness among all stakeholders, starting with the employees.
Financial planning	No, water-related issues were reviewed but not considered as strategically relevant/significant	11-15	Mains and ground waters in our factories are mainly used for cooling, dust removal, washing and irrigation. With the awareness that water is a limited resource, efficiency and recycling of water resources are prioritized. In this context, the budget to be spent in line with the needs of water meters and increasing the settling pools in our Kilis plant, which is experiencing water stress, has a very small effect on our total income, so it does not have a strategic effect on our financial planning.

W7.2

(W7.2) What is the trend in your organization's water-related capital expenditure (CAPEX) and operating expenditure (OPEX) for the reporting year, and the anticipated trend for the next reporting year?

Row 1

Water-related CAPEX (+/- % change)

Anticipated forward trend for CAPEX (+/- % change)

100

Water-related OPEX (+/- % change)

5

Anticipated forward trend for OPEX (+/- % change)

40

Please explain

With the annual approved projects such as investment, improvement, modification and efficiency to be realized as a group, all kinds of investment and infrastructure projects, which are decided to be purchased after instantaneous situations outside the budget, and approved by the CAPEX commission, as well as maintenance, operation and fixture material, before purchasing activities. It covers budgeting and cash flow activities to be performed. Projects have been prepared in our factories for water recovery and efficient use of water, and investments will be started as a result of the technical compliance report. For example, to increase the number of settling basins for the collection and reuse of surface waters, and to design appropriate meters in order to use water efficiently. Training and projects are planned in 2022 and will be carried out in 2023. Due to the increase in the exchange rate and the increase in costs, the operational cost, which is planned as 5%, is considered to be 40%.

W7.3

(W7.3) Does your organization use scenario analysis to inform its business strategy?

	Use of scenario analysis	Comment
Row 1	Yes	Our Kilis Cement Factory operating in the Kilis Region and our Şanlıurfa Cement Factory operating in the Şanlıurfa region are located in the region exposed to water risks according to the WWF Water scarcity report. Scenario analysis has been created for the risks and opportunities determined in the SWOT analysis, especially in our plants that may experience water stress. According to this analysis, if the water withdrawn from the underground well water decreases in the current situation, water stress will be experienced and it will adversely affect the production activities.

W7.3a

(W7.3a) Provide details of the scenario analysis, what water-related outcomes were identified, and how they have influenced your organization's business strategy.

	Type of scenario analysis used	Parameters, assumptions, analytical choices	Description of possible water-related outcomes	Influence on business strategy
Row 1	Water-related	SWOT analysis has been applied as a risk opportunity assessment method for our factories and scenario analysis method has been used for actions.	According to this scenario analysis, if the water withdrawn from the underground well water in the current situation decreases, water stress will be experienced, it will negatively affect the production activities and the cost will increase. This has a significant financial impact on our businesses.	The 2022 water footprint reports of all our integrated cement plants has been verified by the 3rd party verification body according to ISO 14046:2014 Standard. As the Limak cement group, trainings on water management and water pollution have been given to the employees. A target has been set to reduce the process water used in cement production, and the monthly monitoring of the water used per cubic meter/ton of cement is ensured and it is aimed to be reduced. Process-based studies are carried out to reduce the water used. Water footprint reports in accordance with ISO 14046 standard have been carried out in all our factories.

W7.4

(W7.4) Does your company use an internal price on water?

Row 1

Does your company use an internal price on water?

No, and we do not anticipate doing so within the next two years

Please explain

As Limak cement group, we have a management system related to water management and there is no internal price using for this.

W7.5

(W7.5) Do you classify any of your current products and/or services as low water impact?

	Products and/or services classified as low water impact	Definition used to classify low water impact	Primary reason for not classifying any of your current products and/or services as low water impact	Please explain
Row 1	Yes	The 2022 water footprint reports of all our integrated cement plants has been verified by the 3rd party verification body according to ISO 14046:2014 Standard. In our Limak Cement factories, mains and ground water are basically used for cooling, dust removal, washing and irrigation. With the awareness that water is a limited resource, efficiency and recycling of water resources are at the forefront. Process water is used in cement mills, coal mills, rotary kilns and raw mills to cool bearings and bearing oils. Cooling water electrofilter is used in gas cooling towers to reduce the gas temperature and condition the gas, to reduce the cooling gas temperature in the clinker cooling system, to form the grinding bed form in raw mills and cement mills, to reduce the cement temperature in cement mills. Potable water is used as potable water in washbasins, bathrooms, social facilities, administrative and business buildings. In addition, dedusting works, concrete floor sweeping and irrigation, use as fire water are also carried out. In this context, water resources in process and cooling processes have a high recovery rate since they are used as closed loops. Since the process water used in the process stages of the produced cement and clinker is used in a closed loop, it has a low water effect on the ecosystem. Since cement and clinker production has low harmful effects on water resources, water quality and ecosystems, the final product obtained is also called low water impact product. To determine the environmental impacts of the raw materials used in cement and clinker production, in all relevant production, shipment, use by the consumer and post-use stages, Life cycle analyzes are carried out for reporting and management. The requirements of the ISO 14046 standard are implemented in our factories and an annual evaluation report is prepared.	<Not Applicable>	The 2022 water footprint reports of all our integrated cement plants has been verified by the 3rd party verification body according to ISO 14046:2014 Standard. The water consumed in our factories is followed up on a regular basis as process-based and utility water. Since cement and clinker production has low harmful effects on water resources, water quality and ecosystems, the final product obtained is also called low water impact product. Starting from the acquisition of raw materials used in cement and clinker production, life cycle analyzes are carried out to determine, report and manage the environmental impacts of all relevant production, shipment, use by the consumer and after use. The requirements of the ISO 14046 standard are implemented in our factories and an annual evaluation report is prepared.

W8. Targets

W8.1

(W8.1) Do you have any water-related targets?

Yes

W8.1a

(W8.1a) Indicate whether you have targets relating to water pollution, water withdrawals, WASH, or other water-related categories.

	Target set in this category	Please explain
Water pollution	Yes	<Not Applicable>
Water withdrawals	Yes	<Not Applicable>
Water, Sanitation, and Hygiene (WASH) services	No, but we plan to within the next two years	
Other	Please select	<Not Applicable>

W8.1b

(W8.1b) Provide details of your water-related targets and the progress made.

Target reference number

Target 1

Category of target

Water withdrawals

Target coverage

Company-wide (direct operations only)

Quantitative metric

Reduction in total water withdrawals

Year target was set

2021

Base year

2020

Base year figure

Target year

2030

Target year figure

Reporting year figure

0.11

% of target achieved relative to base year

<Calculated field>

Target status in reporting year

Underway

Please explain

The 2022 water footprint reports of all our integrated cement plants has been verified by the 3rd party verification body according to ISO 14046:2014 Standard.

In accordance with our performance monitoring and measurement procedure, the performance of environmental aspects, important energy uses, hazardous events within the scope of occupational health and safety, and related quality, environment, occupational health and safety management systems standards, water and carbon footprint standards are monitored. There is a system for monitoring and measuring the main characteristics of processes and activities that can have significant impacts on the environment, OHS and energy. In accordance with the sustainability environmental policy of the Limak cement group, As a result of the correct analysis of the water footprint, reducing the amount of water directly withdrawn and added to the system by 15% until 2030 is one of our company's goals. An integrated management system target tracking guide was created in 2017 by the sustainability team in order to follow the targets in accordance with the performance monitoring and measurement procedure at our plants. The targets are followed on a monthly basis from the process criteria table. The targets followed are the total water use amount of the total ton of cement produced (m3/ton of cement) and the total amount of water use of the total tonne of clinker. (m3/ton clinker)

The targets are followed on a monthly basis from the process criteria table. The targets followed are the total amount of water use of the total tons of cement produced (m3/ton of cement) and the total amount of water use of the total tons of clinker. (m3/tonne of clinker). The total water use (m3/ton) target determined in 2021, this target has been determined as 0.20 and the actual cumulative value is 0.17 m3/ton cement. In 2022, this target has been determined as 0.15 and the actual cumulative value is 0.11 m3/ton cement.

Target reference number

Target 2

Category of target

Water pollution

Target coverage

Site/facility

Quantitative metric

Reduction in water discharges per business unit

Year target was set

2021

Base year

2020

Base year figure

Target year

2030

Target year figure

Reporting year figure

% of target achieved relative to base year

<Calculated field>

Target status in reporting year

Underway

Please explain

The 2022 water footprint reports of all our integrated cement plants has been verified by the 3rd party verification body according to ISO 14046:2014 Standard.

In accordance with our performance monitoring and measurement procedure, the performance of environmental aspects, important energy uses, hazardous events within the scope of occupational health and safety, and related quality, environment, occupational health and safety management systems standards, water and carbon footprint standards are monitored. There is a system for monitoring and measuring the main characteristics of processes and activities that can have significant impacts on the environment, OHS and energy. In accordance with the sustainability environmental policy of the Limak cement group, As a result of the correct analysis of the water footprint, reducing the amount of water directly withdrawn and added to the system by 15% until 2030 is one of our company's goals. An integrated management system target tracking guide was created in 2017 by the sustainability team in order to follow the targets in accordance with the performance monitoring and measurement procedure at our plants. The targets are followed on a monthly basis from the process criteria table. The targets followed are the total water use amount of the total ton of cement produced (m3/ton of cement) and the total amount of water use of the total tonne of clinker. (m3/ton clinker)

W9. Verification

W9.1

(W9.1) Do you verify any other water information reported in your CDP disclosure (not already covered by W5.1a)?

Yes

Kurtalan ISO 14046 Assessment Report_EN.pdf

Kilis ISO 14046 Assessment Report_EN.pdf

Şanlıurfa ISO 14046 Assessment Report_EN.pdf

Trakya ISO 14046 Assessment Report_EN.pdf

Kurtalan Verification Statement- 14046 - en pdf.pdf

Balıkesir ISO 14046 Assessment Report_EN.pdf

Balıkesir Verification Statement- 14046 - en pdf.pdf

Limak Ankara_ISO 14046 Assessment Report_EN.pdf

Ergani ISO 14046 Assessment Report_EN.pdf

Ergani Verification Statement- 14046 - en pdf.pdf

Şanlıurfa Verification Statement - 14046 - en pdf.pdf

Kilis Verification Statement - 14046 - en pdf.pdf

Limak Ankara Verification Statement - 14046 - en pdf.pdf

Trakya Verification Statement- 14046 - en pdf.pdf

W9.1a

(W9.1a) Which data points within your CDP disclosure have been verified, and which standards were used?

Disclosure module	Data verified	Verification standard	Please explain
W1 Current state	The Water Footprint report of the Limak Cement group has been verified by a 3rd party organization according to the ISO 14046 Water Footprint Standard. In verification, the annual precipitation amount of the region, monthly water usage amounts of the facilities, drinking water amounts, water allocation, process and usage water amounts, flow rates, meter index tracking records, wastewater parameters, uncertainty calculations, blue water footprint type and sources, green water Footprint type and sources, gray water footprint type and sources were verified.	Other, please specify (ISO 14046 Water Footprint Standard)	The Water Footprint report of the Limak Cement group has been verified by a 3rd party organization according to the ISO 14046 Water Footprint Standard As a result of the correct analysis of the water footprint, the amount of water drawn directly and added to the system will be reduced by 15% until 2030. In order to reach our 2030 targets, water footprint reports were prepared and verified by 3rd parties.

W10. Plastics

W10.1

(W10.1) Have you mapped where in your value chain plastics are used and/or produced?

	Plastics mapping	Value chain stage	Please explain
Row 1	Yes	Direct operations	As Limak Cement, we attach great importance to waste separation at the source. All of our integrated factories have zero waste certificates and in accordance with the relevant regulation, all wastes generated within the factory are collected separately as plastic, glass, metal and paper and are sent to disposal by authorized municipal waste trucks.

W10.2

(W10.2) Across your value chain, have you assessed the potential environmental and human health impacts of your use and/or production of plastics?

	Impact assessment	Value chain stage	Please explain
Row 1	Yes	Direct operations	As Limak Cement Group, we do not manufacture plastics. We separate the plastics we use at the source in a way that minimizes the harmful effects on the environment and people and send them to disposal through authorized institutions. We provide information on how many kilograms of plastic waste we send each year through the Zero Waste Information System established by the Ministry of Environment, Urbanization and Climate Change.

W10.3

(W10.3) Across your value chain, are you exposed to plastics-related risks with the potential to have a substantive financial or strategic impact on your business? If so, provide details.

	Risk exposure	Value chain stage	Type of risk	Please explain
Row 1	Not assessed – but we plan to within the next two years	<Not Applicable>	<Not Applicable>	

W10.4

(W10.4) Do you have plastics-related targets, and if so what type?

	Targets in place	Target type	Target metric	Please explain
Row 1	Yes	Waste management	Increase the proportion of recyclable plastic waste that we collect, sort, and recycle	As Limak Cement Group, we do not manufacture plastics. We separate the plastics we use at the source in a way that minimizes the harmful effects on the environment and people and send them to disposal through authorized institutions. We provide information on how many kilograms of plastic waste we send each year through the Zero Waste Information System established by the Ministry of Environment, Urbanization and Climate Change.

W10.5

(W10.5) Indicate whether your organization engages in the following activities.

	Activity applies	Comment
Production of plastic polymers	No	
Production of durable plastic components	No	
Production / commercialization of durable plastic goods (including mixed materials)	No	
Production / commercialization of plastic packaging	No	
Production of goods packaged in plastics	No	
Provision / commercialization of services or goods that use plastic packaging (e.g., retail and food services)	Yes	As Limak Cement Group, we do not manufacture plastics. We separate the plastics we use at the source in a way that minimizes the harmful effects on the environment and people and send them to disposal through authorized institutions. We provide information on how many kilograms of plastic waste we send each year through the Zero Waste Information System established by the Ministry of Environment, Urbanization and Climate Change.

W10.8

(W10.8) Provide the total weight of plastic packaging sold and/or used, and indicate the raw material content.

	Total weight of plastic packaging sold / used during the reporting year (Metric tonnes)	Raw material content percentages available to report	% virgin fossil-based content	% virgin renewable content	% post-industrial recycled content	% post-consumer recycled content	Please explain
Plastic packaging sold	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Plastic packaging used	10	% post-consumer recycled content	<Not Applicable>	<Not Applicable>	<Not Applicable>		As Limak Cement Group, we do not manufacture plastics. We separate the plastics we use at the source in a way that minimizes the harmful effects on the environment and people and send them to disposal through authorized institutions. We provide information on how many kilograms of plastic waste we send each year through the Zero Waste Information System established by the Ministry of Environment, Urbanization and Climate Change.

W10.8a

(W10.8a) Indicate the circularity potential of the plastic packaging you sold and/or used.

	Percentages available to report for circularity potential	% of plastic packaging that is reusable	% of plastic packaging that is technically recyclable	% of plastic packaging that is recyclable in practice at scale	Please explain
Plastic packaging sold	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Plastic packaging used	% technically recyclable	<Not Applicable>	70	<Not Applicable>	As Limak Cement Group, we do not manufacture plastics. We separate the plastics we use at the source in a way that minimizes the harmful effects on the environment and people and send them to disposal through authorized institutions. We provide information on how many kilograms of plastic waste we send each year through the Zero Waste Information System established by the Ministry of Environment, Urbanization and Climate Change.

W11. Sign off

(W-FI) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

W11.1

(W11.1) Provide details for the person that has signed off (approved) your CDP water response.

	Job title	Corresponding job category
Row 1	Chief Executive Officer	Chief Executive Officer (CEO)

Submit your response

In which language are you submitting your response?

English

Please confirm how your response should be handled by CDP

	I understand that my response will be shared with all requesting stakeholders	Response permission
Please select your submission options	Yes	Public

Please indicate your consent for CDP to share contact details with the Pacific Institute to support content for its Water Action Hub website.

Yes, CDP may share our Main User contact details with the Pacific Institute

Please confirm below

I have read and accept the applicable Terms