

A woman with blonde hair tied back, wearing a light-colored button-down shirt and blue jeans, stands with her back to the camera in a large greenhouse. She is holding a clipboard and looking down at it. The greenhouse is filled with rows of green plants. A large, stylized red circular graphic with multiple concentric lines is overlaid on the image, framing the woman and extending towards the top right corner.

**Together, we can build  
a sustainable life**

**Vodafone Turkey  
2022 Environmental,  
Social and Governance  
(ESG) Report**





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from CEO

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# Message from our CEO

In line with our vision to lead digitalization in Turkey, we continue to grow on our way to becoming new generation connection and digital services company. We believe that it is possible to connect people for a better future together with our stakeholders, and we continue to work to achieve this goal.

The effects of climate change are becoming increasingly concerning, and the new economic order that has emerged as a result of global major developments is compelling us to act now in order to build a sustainable future. At Vodafone Turkey, sustainability is an integral part of how we do business, and we are integrating the Vodafone Group's **Purpose-led approach to Environmental, Social, and Governance (ESG) focus areas**, thus strengthening the Vodafone Turkey Sustainability Discourse aimed at creating value for our stakeholders and Turkey and supporting a sustainable future.

Major ESG developments occurred for Vodafone Turkey in the 2021/22 fiscal year. With TL **2.6 billion in investment**, we remained one of Turkey's largest international direct investors, focusing on improving the community's quality of life, making life easier, and achieving full integration with the digital economic era through our products and services. We

created the **Vodafone Turkey ESG Committee** among employees of various departments to monitor our ESG performance and coordinate and align our objectives and efforts.

At Vodafone, we believe that it is possible to achieve economic success without an environmental cost. We have committed to reaching net zero target in our operations until 2030 and in our supply chain until 2040. As an important step towards fulfilling this commitment, we have supplied our entire consumption of 575.930 MWh from renewable resources in the 2021/22 fiscal year and **zeroed our Scope 2 emissions**. As part of our "Waste to Code" project that we developed to encourage e-waste recycling, we recycled more than **12 tons of e-waste with the support of our 41 business partners; and set up 8 coding classes**.

While we are growing our business, we are meeting individuals' need for continuous communication, preparing businesses for the new world shaped by technology, and connecting individuals and communities by providing fast data flow through our mobile and landline networks. We are helping our stakeholders to become more innovative and resilient and supporting them to switch to sustainable and circular business models. With our IoT service solutions,

we have supported our customers to reduce their carbon emissions by **158,552 tons of CO<sub>2</sub>e in total**.

We are supporting sustainable development and working to make the digital future we envisage more inclusive for everyone. During the fiscal year, we provided 24 hours of Digital Literacy and 40 hours of Digital Marketing training to more than 9 thousand women in 13 provinces with 140 trainers as part of the "Connected Women" project. We continued to support the empowerment of women with the Easy Rescue Application. **To date, we reached more than 280 thousand children in 81 provinces with our Coding Tomorrow project, deriving 14 million TL social value in the last year.**

We have been working to build a better future for the world and our communities by harnessing the power of digital technologies since the first day of our operations in Turkey, and we have been transparently sharing the value we create with all our stakeholders. I'd like to thank everyone who helped with the report's preparation, and I hope you find it enjoyable to read.

**Engin Aksoy**  
CEO



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# About the Report

At Vodafone Turkey<sup>1</sup>, we believe that social change is possible when technology and people come together. In our 2022 Environmental, Social, and Governance (ESG) Report, we share our ESG performance for the 1 April 2021 - 31 March 2022 fiscal year, and explain the environmental, social, and economic value we create through our Sustainable Business Strategy and Purpose-led Vodafone approach. We address sustainability in the ESG framework in parallel with global developments, adopting the Purpose-led Vodafone approach of the Vodafone Group, which embraces three pillars: Digital Society, Inclusion for All and, the Planet. In this report, we focused on our ESG strategy built on Purpose-led Vodafone, the material issues we have identified in line with this strategy, and the projects we

have developed. We shared the developments in ESG in 2022, the steps we have taken according to our strategy, and the progress achieved in respect of Vodafone Group's goals for 2030 and 2040. Our efforts directed towards the localization of Vodafone Group's goals and our associated performance are also covered in this report.

While the report which we have prepared in line with the "core" option of GRI Standards issued by the Global Reporting Initiative (GRI) is a progress statement for the United Nations Global Compact (UNGC) that we have signed, it also includes our contributions to Women's Empowerment Principles – WEPs and United Nations Sustainable Development Goals (UN SDGs).

## What is New?

This year, we have added new features to our report. We have integrated Vodafone Group's Purpose-led Sustainable Business Strategy with Vodafone Turkey's ESG approach. In the report, we used tracking icons and colors to indicate the purpose pillars and ESG focus areas matching the material issues and the projects we have carried out.



**Environmental:** Indicates our impact on combating the climate change.



**Social:** Indicates our impact on technological advancement and social development.



**Governance:** Indicates our impact on responsible business practices and economic development.



Indicates our impact focused on **Digital Society**.



Indicates our impact focused on the **Planet**.



Indicates our impact focused on **Inclusion for All**.



Indicates our impact focused on **Responsible Business Practices**.

As detailed in the ESG Approach and Material Issues section, we updated our materiality analysis. In order to give an insight on our approach to Risk and Crisis Management, which is one of the material issues for us, we evaluated sectorial risks and trends before the relevant sections.

Please share your questions and inputs on the report with us:  
[surdurulebilirlik@vodafone.com](mailto:surdurulebilirlik@vodafone.com)

<sup>1</sup>Vodafone Turkey refers to the following companies: Vodafone Telekomünikasyon A.Ş., Vodafone Net İletişim Hizmetleri A.Ş., Vodafone Holding A.Ş., Vodafone Teknoloji Hizmetleri A.Ş., Vodafone Dağıtım Servis ve İçerik Hizmetleri A.Ş., Vodafone Bilgi ve İletişim Hizmetleri A.Ş., Vodafone Elektronik Para ve Ödeme Hizmetleri A.Ş., Vodafone Dijital Yayıncılık Hizmetleri A.Ş., Vodafone Medya İçerik Hizmetleri A.Ş., Vodafone Sigorta Aracılık Hizmetleri A.Ş., Vodafone Kule ve Altyapı Hizmetleri A.Ş., Vodafone Finansman A.Ş., Turkey Vodafone Vakfı and Vodafone Mobile Operations Limited. Vodafone Mobile Operations Limited (Turkish Republic of Northern Cyprus) is only included in the Report when sharing financial performance.



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# Vodafone Turkey



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# Vodafone Turkey at a Glance

At Vodafone Turkey, we do not only offer communication services but also solutions that change lives for various businesses from finance to insurance. Our goal is to become the fastest growing new generation connection and digital services provider in Turkey until 2025. We are offering services to 81 provinces in Turkey with 4.5G communication points and We continue to be the operator with the widest 4.5G coverage in Turkey. Thanks to our services, we are fully meeting needs of our individual and corporate clients and providing uninterrupted technological and digital support.

At Vodafone, we are committed to provide services to all segments of the society, and we are known for the technologies we offer; however, we believe that what makes these technologies meaningful and help us to move our business forward is the stories that all our stakeholders create in their lives using these technologies. We are aware that we have to play an inclusive, effective, and responsible role in this changing world. We have been creating value in Turkey for the last 16 years believing that everything is possible when our values, technology, and people come together.

## Vision

To lead digitalization in Turkey.

## Mission

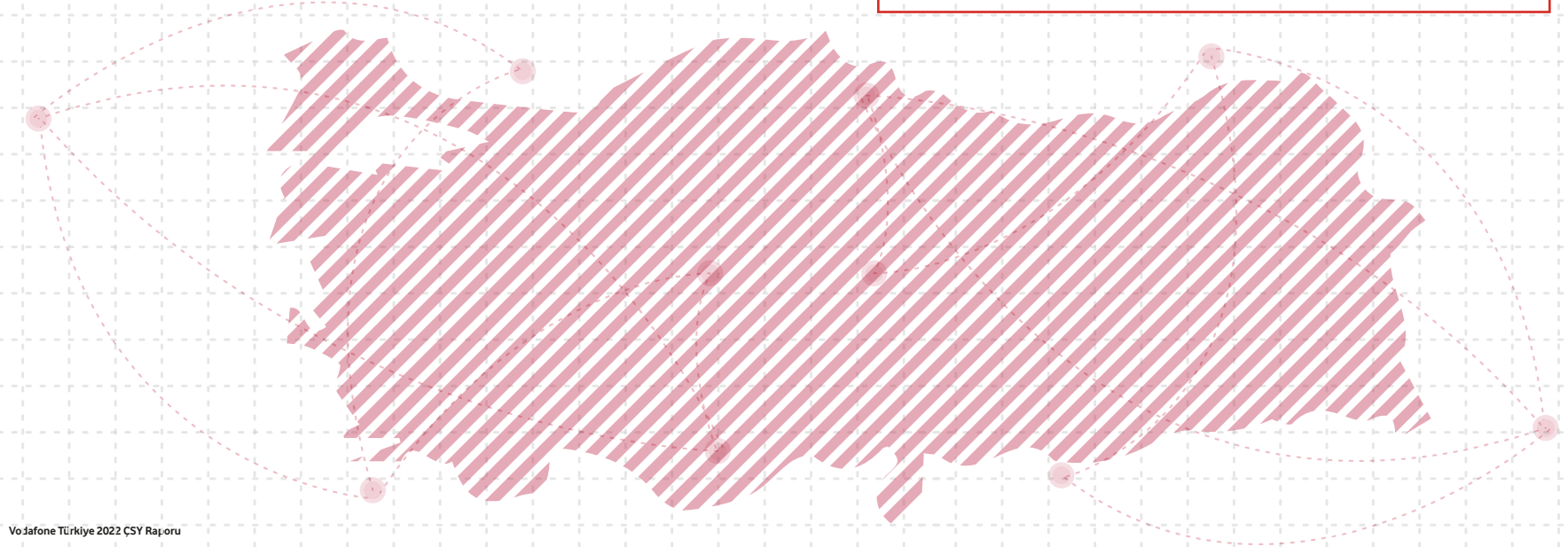
To be a more agile and fast-paced company that is also lean and digital future-ready in regard to our employees and customers.

## Values

We offer fast, high-quality, simple and reliable services to enhance our customers' lives and support them in benefiting from diverse opportunities and fulfill their potential.

As an international company loyal to its local roots, we are a part of the Vodafone Group, one of the largest telecom and technology providers across the globe.

We are a customer-oriented, innovative and competitive corporation.



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# Vodafone in Figures



**24.4 Million**  
Mobile Subscribers



**18.8 Million**  
Digital Customers



**2.959**  
Employees



**946**  
Stores



**90**  
Next Generation  
Stores

**17.2 Billion**  
Service Income

With  
**21.4%**  
Organic Growth

**5.7 Billion**  
EBITDA

With  
**23.8%**  
Organic Growth

**We zeroed** our **Scope 2** emissions by **100%** renewable energy.

We reduced  
our **Scope 1**  
emissions by

**9%**

compared to  
baseline year  
FY 2019/20.

With the **"Waste to  
Code"** Project  
we established

**8**

coding classes  
by recycling

**more than  
12 thousand  
of waste.**

With our **IoT**,  
service solutions,  
we avoided

**158.552**  
tons of CO<sub>2</sub>e

emissions.

Our **Easy Rescue App**  
was downloaded

**372 thousand times.**

We reached

**more than  
280 thousand**

children with the  
**"Coding Tomorrow"**  
project.

We reached

**more than  
9 thousand**

women with the  
**"Connected Woman"**  
project.



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# Our Impact Along the Value Chain Model



**We are creating sustainable value for all our stakeholders and contributing to the society.**



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# Sustainable Business Strategy: Purpose- Led Vodafone



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## We Define Our Strategy with the ESG Perspective

# E



In order to take urgent action to combat the climate crisis, we develop new technologies by using the power of our industry, set competitive targets and work to reduce the environmental impact of our entire value chain beyond Vodafone Turkey by saying "Together We Can".

# S



On the one hand, the solutions we provide change and improve the lives of our customers, on the other hand, we work hard with all of our employees to create an equitable structure for access to technology and to support social development.

# G



We follow effective governance methods while conducting our business and manage our impact on our value chain with same perspective. We know the importance of the value of data and work without compromise to maintain our ethical, respectful and value-creating business model.

## Under the guidance of our Group's Purpose-Led Approach

### Digital Society

With our gigabit networks, IoT and mobile financial services, we connect people and enable the development of new technologies.

### Inclusion for All

Through our technology, we ensure that a better digital future and opportunities are accessible to all, and we work for a more equitable society.

### Planet

We work with the belief that business success should not come at a cost to the environment, and we reduce our environmental impact on our planet to combat climate change.

### Responsible Business Practices

**In cooperation with our stakeholders, we aim to create comprehensive value for environment, social and economic development through our effective governance model and our material issues.**





# ESG Approach and Material Issues

We are guiding digital transformation on the way we set out to connect our stakeholders to live a better today and build a better tomorrow. We are playing a significant role in social transformation and development by focusing on areas where we can effectively use the potential of our industry to create value.

Under the guidance of the Purpose-led Vodafone approach developed by the Vodafone Group, Vodafone Turkey adopts and localizes the Group objectives. We address **Digital Society, Inclusion for All, and Planet** purpose pillars through Environmental, Social, and Governance focus areas. Thus, we are strengthening the Vodafone Turkey Sustainability Discourse aiming to create value for our stakeholders and Turkey and supporting a sustainable future.

With our ESG approach we have a direct and indirect impact on the lives of individuals and organizations, while preparing the

society for a better future.

We strive to improve our performance even further in the context of the material issues in the **Environmental, Social, and Governance** focus areas, and we will continue to create value through our projects. Within the scope of Vodafone Turkey's ESG strategy, we localize global objectives, and we review our ESG material topics every year to see where our future strategy intersects with stakeholder expectations.

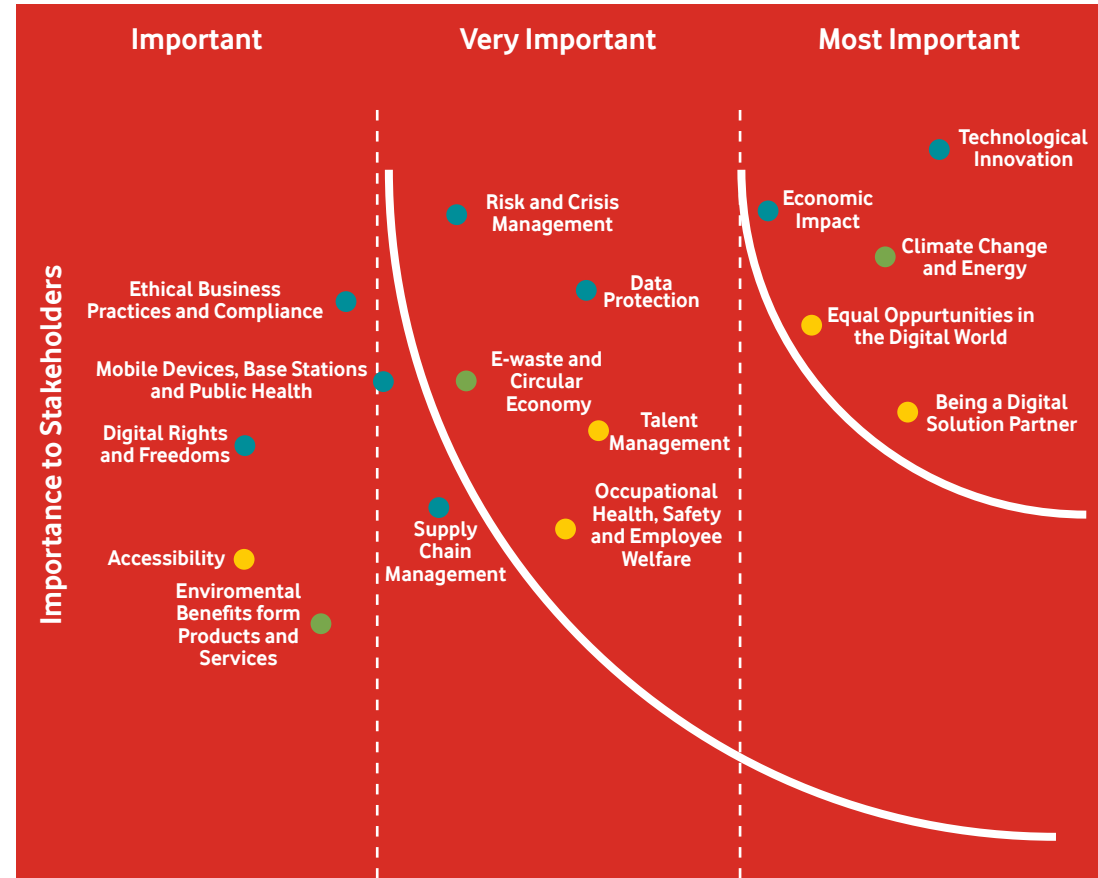
We used global trends and sectoral developments as inputs in our materiality analysis, in addition to the Stakeholder Workshop outputs. As a result of our analyses, we made minor changes in the scope of certain material issues. These changes are summarized as follows:



# ESG Approach and Material Issues

- The “Responsible Products and Accessibility” is now divided into two material issues: “Accessibility” and “Environmental Benefits from Products and Services”. Thanks to many of our products that create environmental benefits, we reduce the environmental impact and carbon footprint of our customers. In order to better pursue our objectives, we have identified “Environmental Benefits from Products and Services” as an individual material issue.
- “Transparency, Ethics and Human Rights” is renamed as “Ethical Business Conduct and Compliance” to reflect the Sustainable Business Strategy of the Vodafone Group.
- “Being a Digital Solution Partner, Digital Customer Experience and Satisfaction” is renamed as “Being a Digital Solution Partner” since customer experience and satisfaction constitutes an integral part of our business.
- Since we support our stakeholders in our value chain in different areas through the material issues we have identified, and supplier management is becoming even more important with the developments in the industry, we have renamed the “Responsible Value Chain” as “Supply Chain Management”.
- “Inclusion and Equal Opportunities” is now renamed as “Equal Opportunities in the Digital World” in order to reinforce the impact of this topic on the entire value chain.
- “Occupational Health and Safety” is renamed as “Occupational Health, Safety and Employee Wellbeing,” with an emphasis on the actions we have taken and the projects we have undertaken for the welfare of the workforce.

## Materiality Matrix



## Importance to Vodafone Turkey

● Environment ● Social ● Governance



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# Contribution to Sustainable Development Goals



**Vodafone Turkey contributes directly to 5 SDGs and indirectly to 5 SDGs\***

\*Sustainable Development Goals to which we contribute as Vodafone Turkey are colored in the graphic.

In today's world when global problems need global solutions, we contribute to the UN Sustainable Development Goals (SDGs), which were put forward with the slogan of "leaving no one behind", in line with the focus areas and material issues. Our business is to connect people for a better future, and we contribute directly and indirectly to the achievement of 10 SDGs through our business activities carried out in line with the identified material issues.

We **directly contribute to SDG 13** with our energy efficiency projects and IoT solutions in pursuit of our net zero target by 2040, and **indirectly to SDG 7** with our transition to 100% renewable energy.

We **indirectly contribute to SDG 3** by diligently monitoring the occupational health and safety practices of our workforce and suppliers; to **SDG 4** with our training programs that provide benefits to our employees and the society as a whole; and to **SDG 5** with our projects focused on providing equal opportunities in the digital world and aimed at women

empowerment and participation of young people in the labor market.

We contribute **directly to SDG 9** and **indirectly to SDG 11** by expanding access to IoT technologies and developing infrastructure with mobile communication technologies and base stations; and we contribute **directly to SDG 12** by supporting sustainable consumption through technological innovations that will develop Industry 4.0, IoT applications, and next generation payment systems.

We **directly contribute to SDG 8** through our vision of creating positive economic impact and supporting social development with every step we take in our business, and to **SDG 17** through the collaborations we realize around our focus areas and with the support of our stakeholders.

In the [Annexes](#), you can find our mapping study on the SDGs that we contributed to with our projects in 2022.



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# Contribution to Sustainable Development Goals

Material Issue	Vodafone Turkey Focus Area	Vodafone Group Purpose Pillar	KPI's	SDG Relationship	Relevant Section
Technological Innovation			The number of users and visitors of My Vodafone App		Technological Innovation
Climate Change and Energy			GHS emissions, amount of emission by source, energy consumption, number of hybrid vehicles		Climate Change and Energy
Equal Opportunities in the Digital World			Number of individuals reached with the projects conducted for young people and empowerment of women		Equal Opportunities in the Digital World
Being a Digital Solution Partner			Number of individuals benefitted from our digital solutions		Digital Solutions That Transform Lives
Economic Impact			Economic value created (over GDP), annual investment amount		Economic Impact
Risk and Crisis Management			Continuous monitoring of sectorial risks and mega trends		ESG Trends and Risks
Data Protection			Compliance with Information Security Management Standards, uninterrupted connection and internet use ratio		Data Protection
E-waste and Circular Economy			Ratio of e-waste recycled/reused/sold, the amount of office waste		E-waste and Circular Economy
Talent Management			Employee training hours, employee turnover rate, positions filled with internal candidates		Talent Management
Occupational Health, Safety and Employee Welfare			Number of accidents involving our employees and subcontractors, OHS training hours		Occupational Health, Safety and Employee Wellbeing

[Click to see Vodafone value area and ESG focus area icon and coloring details.](#)





# Stakeholder Engagement

One of the main contributors to the long-term sustainability of the companies is their relations with their stakeholders. Policies including all stakeholders and creating common values are needed for a sustainable success. At Vodafone, we attach importance to receiving feedback from our stakeholders, listening to their expectations and taking actions to meet such expectations.

We regularly communicate with our stakeholders through various channels, understand their priorities and expectations, and strive to develop projects and services to meet these expectations. In this process, we convey our ESG vision, with all its dimensions, to our stakeholders in our ecosystem. We use the most appropriate and effective communication tools to learn about the expectations, needs, and priorities of our different stakeholders; we come together with our key stakeholders at Stakeholder Workshops that we organize every year to have long-term and efficient relations. In these workshops we share our ESG performance, collect their inputs on our activities, and we collaborate with them. Please see [Annexes](#) for the more information on our stakeholder engagement.



## 2022 Stakeholder Workshop

This year, we held our stakeholder workshop in April in order to consult with our stakeholders, make our ESG activities more effective, and to increase the positive impact of the on-going and future activities. There were almost 30 stakeholders in the workshop including NGOs, representatives from the public sector, academics, media representatives, Vodafone employees, suppliers, and business partners. The workshop was held on-line

with 7 facilitators, and we asked our stakeholders to propose solutions to 6 different questions related to three purpose pillars: Digital Society, Inclusion for All, and Planet. We listened our stakeholders' expectations and their feedbacks during the workshop and exchanged ideas with them. Our goal was to have an in-depth discussion of the Sustainable Business Strategy of Vodafone Turkey, and to develop sustainable cooperation models that could create a positive impact on different areas.

# ESG Governance

When conducting our business in line with our Purpose-led Approach, we aim to create value under our Environmental, Social and Governance focus areas and the associated material topics. We are aware of the importance of sustainable development for today and for our future. This understanding shapes our activities and governance approach, and we channel what we do to contribute to socioeconomic development by developing impact-oriented products, services, programs, and projects.

## Vodafone Group's Goals to:

- Fight against the climate crisis and e-waste
- Support construction of the digital society
- Promote women's empowerment and provide equal opportunities to young people
- Support women's empowerment in the workplace by having a diverse and inclusive workforce.

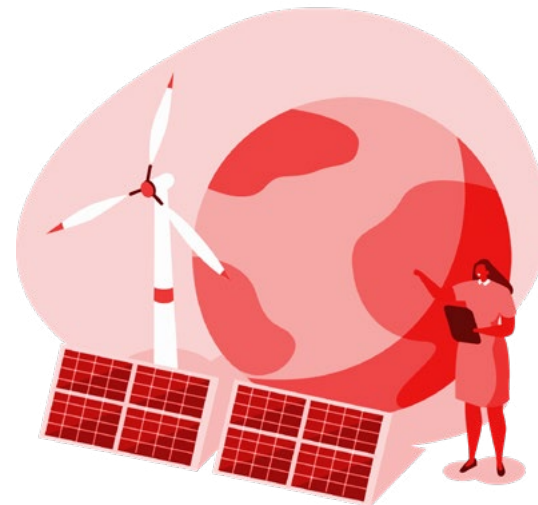
## At Vodafone Turkey

We adopt all global commitments and continue our localization efforts for the relevant targets. As a result of our work, we achieved to clarify our local diversity and inclusion targets. In this context, our goal is to

- Develop a digital culture,
- Increase female employment rate above 40%
- Provide the opportunity to our employees to manage their own future as part of the internal performance and talent management efforts.

We adopt global commitments made by the Vodafone Group in relation to Digital Society, Inclusion for All and Planet, and we localize them as Vodafone Turkey's goals in line with our ESG approach and priorities. We identify our performance indicators when pursuing our targets and seek to improve our performance even further. Our strong ESG management guides us in this process.

We believe that ESG issues, which are critical to preventing serious environmental threats to our planet and building a more inclusive and just society, must be addressed through concrete action, effective reporting, and transparency. Based on this insight, we established Vodafone Turkey ESG Committee in 2022, taking a structural step toward making ESG performance monitoring more measurable and implementing cutting-edge projects and practices that will inspire our industry and the business world. In this regard, we monitor our ESG performance by coordinating our sustainability activities with Vodafone Group through this committee, and we make our goals and efforts more coordinated and focused.

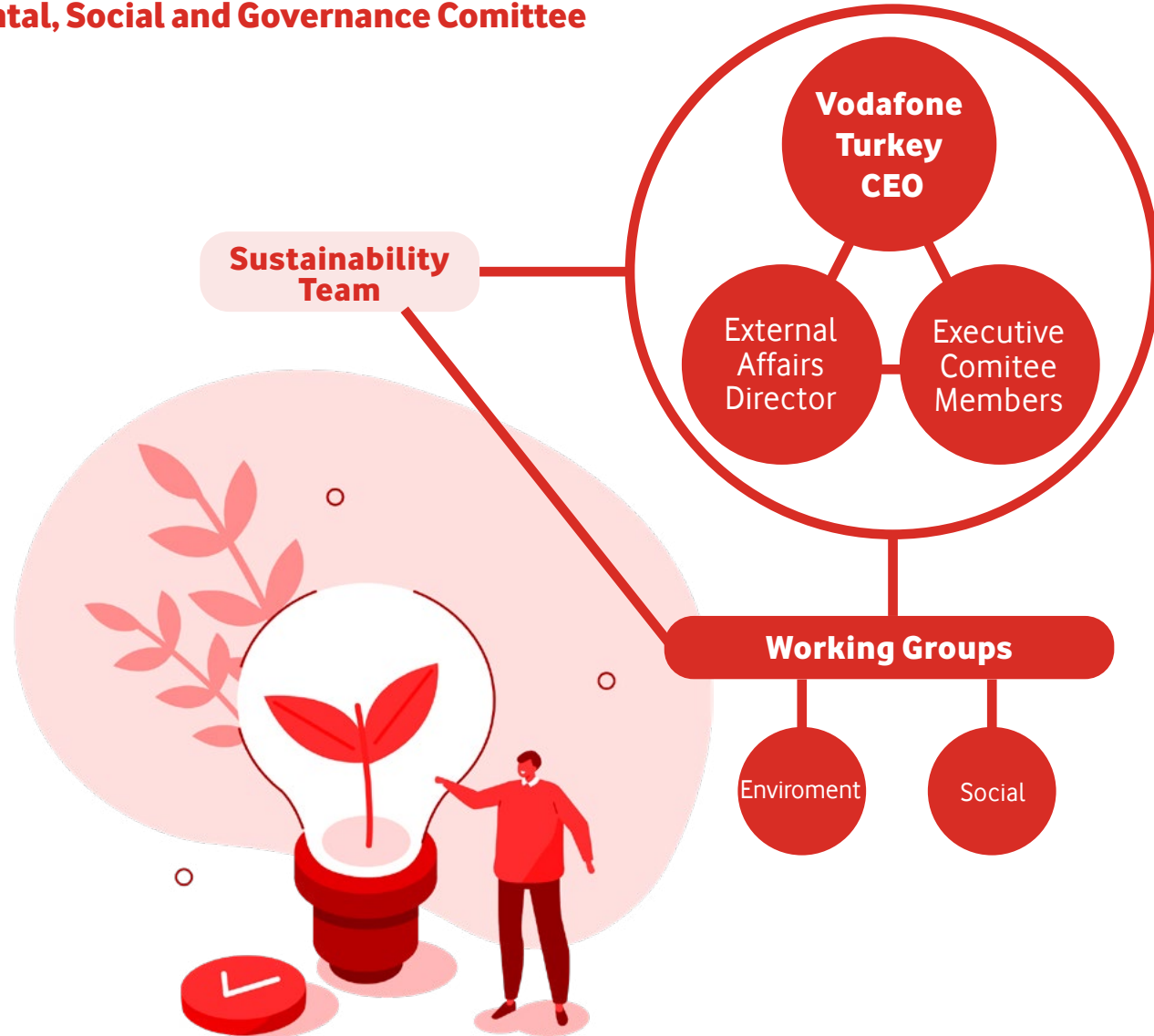




# ESG Governance

## Vodafone Turkey Enviromental, Social and Governance Comittee

The ESG Committee chaired by our CEO is composed of two working groups: Environmental and Social, whereas governance activities are monitored by the entire committee. The working groups, which include 35 employees from various departments ranging from procurement to human resources, technology to sustainability, meet every three months to monitor development in their target areas and develop effective projects in line with Vodafone Group and Turkey's goals. The working groups report the latest progress in the pursuit of the targets, ESG risks and opportunities, performance and activities to the senior management twice a year. On the other hand, Vodafone Turkey Sustainability Team, which is in charge of ensuring coordination within the Committee and strengthening communication between working groups, actively contributes to the work of the ESG Committee established across the Vodafone Group in 2020 and encourages the dissemination of good practices from Turkey in other countries.





# Environment:

Acting responsibly  
for a sustainable  
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## Environmental Risks and Sectorial Trends

According to the World Economic Forum's (WEF) Global Risks Perception survey, the top three most severe global risks over the next 10 years are expected to be the climate action failure, extreme weather events, and biodiversity loss. In 2021-2022, many events were organized to assess the potential impact of these risks on the countries and the business world.

At the end of 2021, important steps were taken to **limit the rise in the global average temperature to 1.5°C** with the Glasgow Climate Pact, one of the outputs of the Glasgow Climate Summit. 153 countries were asked to strengthen their nationally determined contributions to fight against climate change, the finance industry pledged to support climate adaptation efforts, and steps were taken to mobilize funds allocated by private institutions and central banks towards global net zero.

Once more the role of the telecommunications industry in the pursuit of net zero target was emphasized. Telecommunications industry has a transformative and energy efficiency-enhancing effect on many different sectors through its technology and communication tools provided by the sector. The industry has a multiplier effect in the fight against climate change, as 5G technology is much more energy efficient than 4G, and the fact that the sector develops tools to be used by different sectors to ensure energy efficiency, management and carbon emission optimization.

### Impact Factors

EU Green Deal	Market-based incentives such as carbon pricing and tax	Increasing investor support for Net Zero transformation
Continuous increase in sustainable financial products		Sustainability oriented customer expectation



We recognize the importance of understanding sector-specific environmental risks and focus areas and accurately assessing their impact on our business. As a result of the analysis conducted with SASB Materiality Map, S&P Risk Atlas and MSCI ESG Industry Materiality Map, the following are considered to be sector-specific environmental risks:

- **Climate Crisis - Extreme Weather Events**
- **Carbon Emission**
- **Efficient Energy Management**

### Assessment of International Initiatives in Terms of Environmental Risk and Focus Area

Sustainability Initiatives	Climate Crisis Extreme Weather Events	Carbon Emission	Efficient Energy Management
SASB Materiality Map			✓
S&P Risk Atlas	✓	✓	
MSCI ESG Industry Materiality Map		✓	



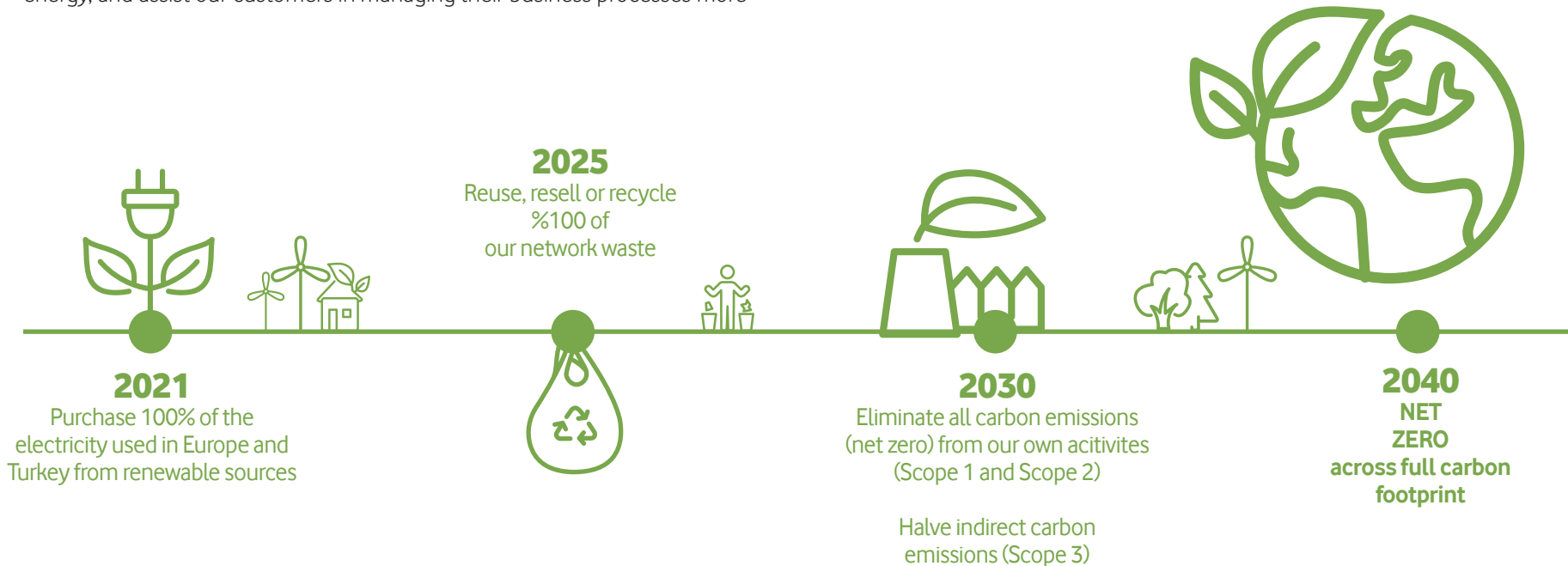
# Climate Change and Energy

Climate change, one of the century's most serious threats to society and the environment, requires immediate and sustained action. Digital needs, data use, and energy needs are increasing in tandem with population growth and improved quality of life, and the telecommunications sector is expected to meet these demands while minimizing the environmental impact. At Vodafone, we believe that economic success should not come at a cost to the environment, and that economic sustainability and social welfare can coexist with environmental sustainability. In accordance with the recommendations of Vodafone Group's Task Force on Climate-related Financial Disclosures and climate strategy, we assess the risks and opportunities posed by the climate crisis, carry out energy efficiency activities through the use of our digital competencies, reduce greenhouse gas emissions from our operations through generation and use of renewable energy, and assist our customers in managing their business processes more

efficiently and reduce their carbon footprint with our IoT solutions and smart applications.

## Reducing Carbon Emissions of our Operations

Vodafone Group committed to reach net zero in its operations by 2030 and in its supply chain by 2040. Our emission reduction targets for 2030 have been approved by the Science Based Targets initiative in line with the reductions required for limiting the rise in the global average temperature to 1.5°C, which is the most ambitious target of the Paris Agreement. Vodafone Turkey is supporting and pursuing this commitment. In this context, we monitor and report our carbon emission sources and carry out mitigation efforts.



# Climate Change and Energy

At Vodafone Turkey, we reduced our total carbon emissions in the 2021/22 financial year.

- Our Scope 1 emissions was reduced by **9%** compared to the 2019/20 baseline year, amounting to 12,723 tons of CO<sub>2</sub>e.

- **575.930 MWh<sup>2</sup>** of electricity consumed in 12 data centers, 16 office buildings and more than 25 thousand base stations was purchased entirely from renewable energy sources, **zeroing our Scope 2 emissions.**

- We expanded the scope of our Scope 3 emissions to cover employee commuting, air and train travels, as well as downstream transportation and office waste. Our Scope 3 emissions was 51.883 tons of CO<sub>2</sub>e.

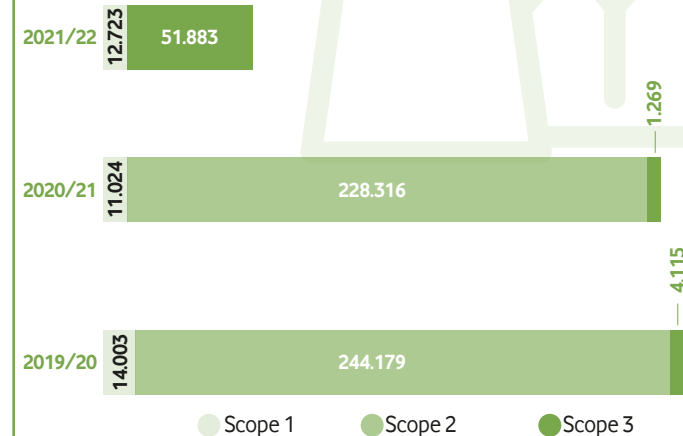
## Transition to Hybrid Vehicles

At Vodafone Turkey, 22% of our Scope 1 emissions, and 67% of our energy consumption in Scope 1 is from vehicle fuels. In order to reduce the emissions from our company vehicles, we replaced a part of our fleet with hybrid vehicles in FY2021/22. This helped us to save 3 kg tons of CO<sub>2</sub>e per km of hybrid vehicles, which translated to 67 tons of CO<sub>2</sub>e emission savings in total. We will continue to increase the number of hybrid vehicles in our fleet in the coming year.

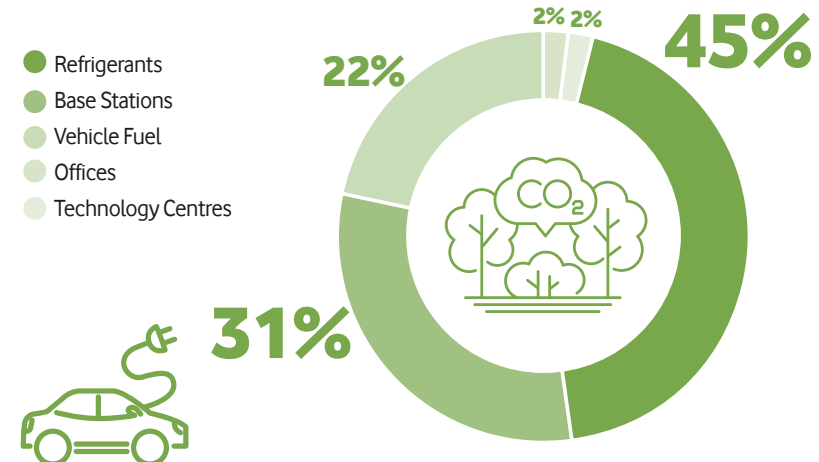
## Business Travels Ready for the Future

Although face-to-face communication remains important, with the pandemic, we have recently experienced that we can conduct our business by traveling less. We have updated our Global Travel and Event Management Policy to reflect our Group goal of reducing Scope 3 emissions **by 50% by 2030 and reaching net zero by 2040**, believing that it is possible to come together without negatively impacting the environment. In this context, we have made changes to ensure that travel is primarily used to develop new relationships and grow our business, and that digital tools are used for other interactions. Furthermore, we now send warning messages to our employees via the App we use for our travels, encouraging them to choose the most environmentally friendly travel options (e.g., low CO<sub>2</sub> emission flights). Through all these efforts, in addition to reducing costs, we hope to improve the overall quality of life of our employees by reducing the time spent on travel, minimize our environmental impact and move one step closer to our net zero target.

GHG Emissions (ton CO<sub>2</sub>e)



Emissions by Source (ton CO<sub>2</sub>e)



<sup>2</sup>Grid electricity consumption is included and renewable energy generated at Vodafone sites is excluded.

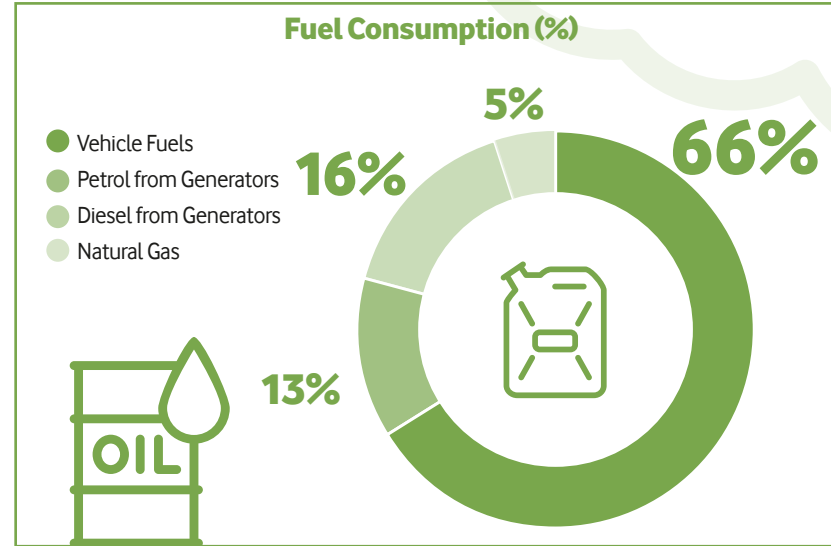


# Energy Use in Vodafone Turkey

The energy demand of the telecommunications sector, which currently consumes 2% to 3% of global energy, is rising as a result of increased mobile data usage and data traffic caused by digitalization. For the future of the industry and the planet; it is necessary to meet the high energy needs, due to growing demand, from renewable energy sources, and to adopt energy management systems based on high energy efficiency through optimizing operational processes.

We are committed to continuously improving the energy efficiency of our base stations and technology centers, which account for 96% of our total energy consumption. Reduced energy consumption (and associated carbon emissions) through energy efficiency projects is the top priority in

our hierarchy of actions to achieve our environmental goals. As a result, we implemented the “**best-in-class**” ISO 50001 Energy Management System in our main technology centers in Esenyurt, Tuzla, Izmir, Ankara, and Adana, as well as in our approximately 25 thousand base stations; becoming the first country in the Vodafone Group to implement ISO 50001 Energy Management System in all of its base stations and main technology centers. In FY2021/22, we reduced the energy intensity per base station by **3%** and the energy intensity per mobile data by **26%**. In addition, we reduced the greenhouse gas intensity per base station - which has the greatest impact on carbon emissions - and greenhouse gas intensity per unit of data by **99%** by zeroing Scope 2 emissions.



## Energy Management in Vodafone Turkey

Energy management approach in Vodafone Turkey is led by the Energy Management System (EnYS) Policy and Energy Team. The Energy Team, which consist of employees from various departments, is in charge of following and adapting to global energy management trends as well as operating in accordance with energy policies. The Energy Team plays an important role in setting targets and implementing actions regarding the climate crisis and carbon management, especially our 2040 Net Zero target.



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# Energy Use in Vodafone Turkey



Base Stations  
**487.832 MWh**  
**82%**

Technology Centers  
**85.498 MWh**  
**14.4%**

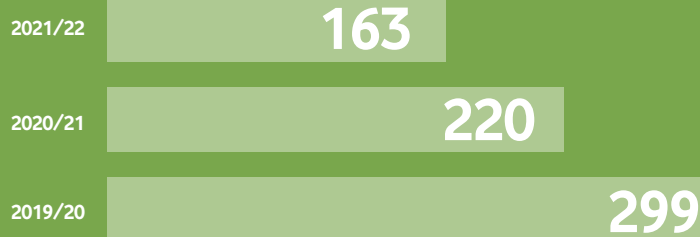
Offices  
**9.563 MWh**  
**1.6%**

Vehicle Fuels  
**11.745 MWh**  
**2%**

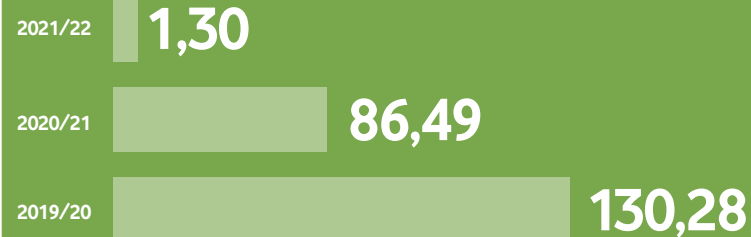
Total Energy Consumption  
**594.638 MWh**

\*Total energy consumption of the locations includes electricity consumption.

## Base Station Energy Intensity (MWh/Petabayt)



## Base Station GHG Intensity (ton CO<sub>2</sub>e /Petabayt)



## Artificial Intelligence in the Conditioning Infrastructure of the Data Center

At Vodafone, as part of our efforts to achieve energy efficiency, we focus on procuring more efficient network equipment, reducing energy demand by installing lower energy power and cooling technologies, and reducing energy use by replacing old equipment. Accordingly, we are managing the air-conditioning infrastructure of our technology centers with Artificial Intelligence Supported Digital Thermal Management Application. This application allows us to monitor the ambient temperature, determine the cooling needs of the systems, and ensure that the air-conditioning units operate in the most efficient range. Thus, we improve Power Utilization Efficiency (PUE) at our

technology centers by 10%, save 30% energy in average in the air-conditioning infrastructure, and save more than 8 GWh energy annually.

## Variable Frequency Driver Application

We provide energy efficiency with the Variable Frequency Driver (VFD) application by allowing on-off air conditioning unit fans to operate at variable capacities and in limited ranges for maximum efficiency. Thanks to this application, which we implemented in 4 data centers in total until today, we aim to save approximately 1,100 MWh energy annually.



# 100% Renewable Energy

Supplying electricity, one of the biggest emission sources of the telecommunications sector, from renewable sources is not only important for achieving our net zero goal in our operations by 2030, but also critical for the decarbonization of the entire sector. At Vodafone Turkey, **we zeroed our Scope 2 emissions** as of FY2021/22,

by sourcing **575,930 MWh** of electricity consumed in 12 data centers, 16 office buildings and more than 25 thousand base stations entirely from renewable energy sources and we continue to invest in renewable energy projects to reduce our environmental impact.

## Renewable Energy Generation at Vodafone Facilities

As part of our transition to net zero, we prioritize generating our own energy from renewable sources, for instance, we are using solar panels in the regions that we operate. As of FY2021/22, we increased our **renewable energy generation by 49%, generating a total of 1,047 MWh of electricity.** Renewable

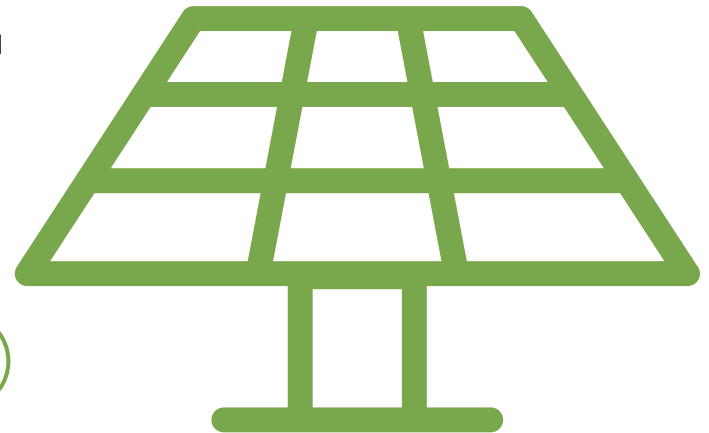
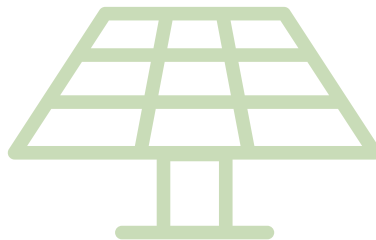
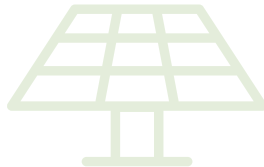
electricity generation at our own facilities currently accounts for less than 1% of our total electricity consumption. We aim to continue our renewable energy investments in the coming years in our technology centers in Izmir, Tuzla and Diyarbakır to generate more green energy and prevent carbon emissions.

### Esenyurt Technology Center Solar Power System

The rooftop solar power system, which we implemented at the Esenyurt Technology Center with an investment of TL 3.2 million, is the largest solar energy system installed in a technology center in Turkey and Vodafone Group countries, with an installed capacity of 475 kWh. In FY2021/22, we prevented 306.5 tons CO<sub>2</sub>e of carbon emissions, generating 472.9 MWh of renewable energy.

### Adana Technology Center Solar Power System

In the Vodafone Adana Cloud Technology Center Solar Power Plant, one of our five largest cloud technology centers in Turkey, we prevented 221.1 tons of CO<sub>2</sub>e carbon emissionsv this year, by generating 341.1 MWh renewable energy.



# E-waste and Circular Economy

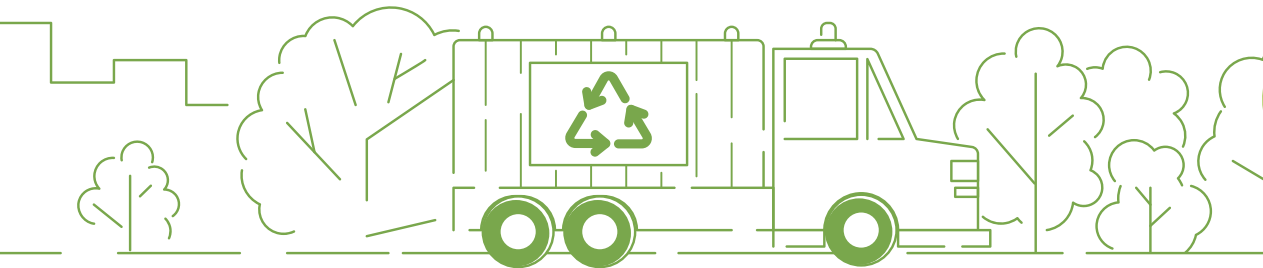
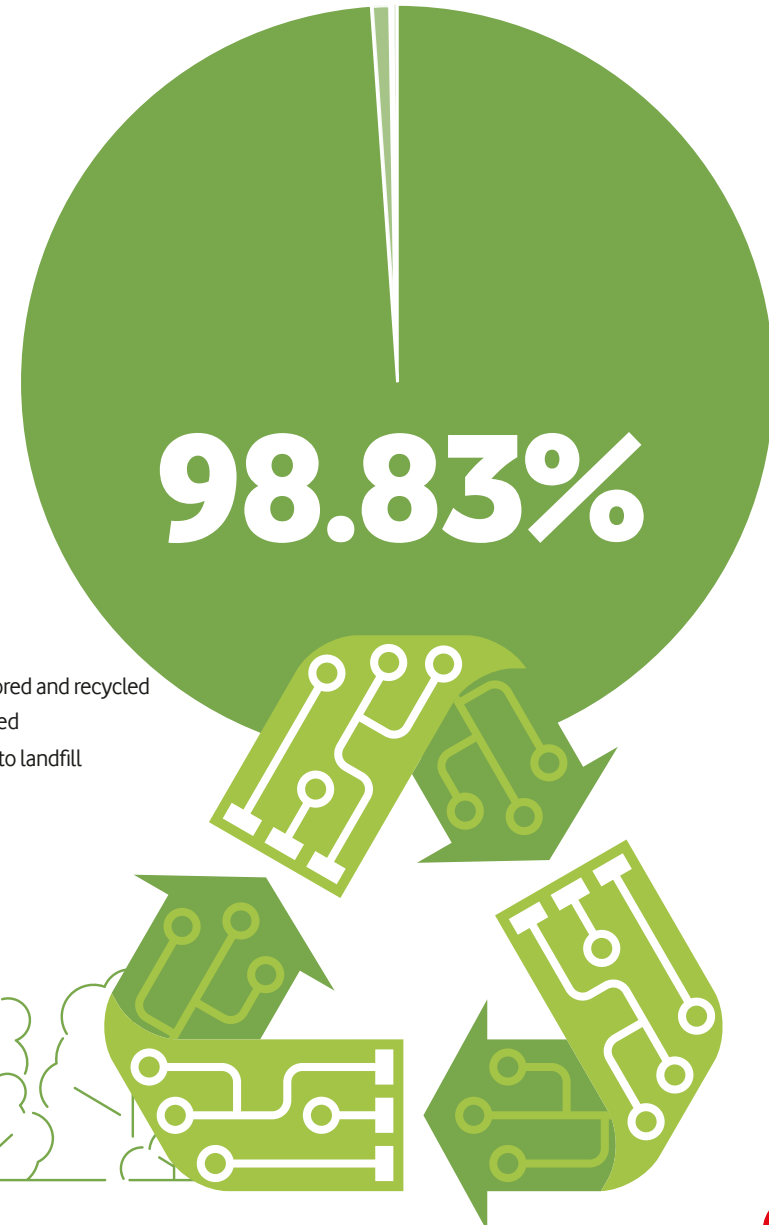
With rapid population growth, technological advancements, and rising standard of living, one of the environmental issues that the world is facing is electronic waste. As technology evolves faster than ever, the devices we use are rapidly becoming obsolete, and e-waste is becoming an increasingly visible aspect of the waste problem of our planet. When disposed of conventionally, these wastes aggravate the negative effects of the climate crisis due to emission of greenhouse gases and harmful gases, as well as threaten human health and natural life.

At Vodafone Turkey, eliminating generation of e-waste and adopting circular economy models that focus on efficiency is a material issue for us. To this end, we embrace Vodafone Group's commitment to **reduce e-waste**

**and reuse, resell or recycle 100% of our network-generated e-waste by 2025**, and we are implementing circular economy models that also bring economic opportunities to prevent the environmental problems that e-waste can cause.

To solve the e-waste problem, we prioritize reusing, reselling, or recycling equipment as part of our waste management policy; aiming to keep resources in use for as long as possible, extract the maximum value from the equipment while in use, and then responsibly recover and reuse materials. In 2022 fiscal year, 99% of the total 3,262 tons of e-waste generated by our operations was circled back to the economy by recovering and recycling.

E-wastes 1.03% 0.05%





# E-waste and Circular Economy

## Waste to Code

This year, we continued the "Waste to Code" project that we've developed to encourage recycling of e-waste. Within the scope of this project, we aim to convert e-waste to added value, thus creating a social and environmental impact. We collect electronic waste that our employees and the employees of our business partners and customers bring from their houses and ensure that these wastes are recycled by the licensed recycling company Akademi Çevre. We have recycled more than **12 tons of e-waste** to date in the project, where we collect a wide range of e-waste from small household appliances to IT equipment, toys to entertainment and sports equipment in cooperation

with our **41 business partners** who support the project. With the economic income generated by recycling, we are establishing coding classes in schools as part of the "Coding Tomorrow" project, which is being carried out in collaboration with the Vodafone Turkey Foundation and the Habitat Association. This project, which began in May 2019, has resulted in the establishment of **8 coding classes** in primary and secondary schools in the provinces of Mardin, Samsun, Adana, Gaziantep, Bingöl, Çanakkale, Uşak, and Bursa. In the coming months, we hope to expand our project with the help of more business partners and increase the number of classes by recycling more e-waste.



## Green Planet

We implemented the "Green Planet" project in collaboration with the Vodafone Foundation and the Habitat Association in order to raise environmentally conscious and sustainable generations. During the Green Planet project, which is designed as a sub-project under the Coding Tomorrow project, children aged 7-14 living in different provinces of Turkey receive training. The training sessions include subjects such as "What is the Environment?", "Sustainability and Climate Change", "Waste, Recycling and Electronic Waste", "Disaster Training" and after the training sessions, we offer the "Coding Tomorrow" sessions. When all the training sessions are completed, children can watch the contents shared on the on-line platform called "So what can I do now?", which enhances their awareness on sustainability and disasters.

In the last stage of the project, we organize idea marathons, which we call "kidathon", among the project participants. In the competition, which we organize in two stages, we expect students, who previously participated in awareness training, to come up with solutions to environmental problems such as climate change, electronic waste recycling, recycling, sustainability, and disasters. In the end, we present technology vouchers to the teams selected by the jury. We have reached **4,200** children in the project so far and we are continuing our efforts to expand our project throughout Turkey in the upcoming period.

[Please click for more information about the trainings.](#)

You can click to watch the video.



You can click to watch the video.



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# E-waste and Circular Economy

## Green Offices

Our headquarters in Maslak, Istanbul; is one of Turkey's oldest Green Office buildings, holding the WWF's Green Office Certificate, which promotes carbon emission reduction, energy conservation, renewable and responsible use of natural resources. Furthermore, we are continuing our efforts to reduce the environmental impact of our offices through initiatives such as "Vodafone without Plastic" and "Go Green", which we have implemented to make environmental awareness a part of our

corporate culture. To make our offices plastic-free; we eliminate the use of unnecessary plastic and disposable products, favor environmentally friendly and recyclable products such as paper cups, glass bottles, cloth bags, and eco-friendly packaging and strive to recycle waste generated from our office activities and bring them back into the economy, using circular economy principles. We reduced the amount of paper waste in our offices by **9%** in FY2021/22 compared to the previous year, while reducing the amount of plastic waste by **56%**.



Office Waste (kg)	FY19-20	FY20-21	FY21-22
Paper	450	2450	2218
Plastics	250	2430	1070
Vegetable oil	0	0	140
Glass	28	0	0
Battery	374	0	0
Waste Mineral Oil	4110	0	0
<b>Total Waste</b>	<b>5212</b>	<b>4880</b>	<b>3428</b>



## Next Generation Environment-Friendly Stores

As Vodafone, we value the green transformation of our stores, which we renovate using the next generation retail approach. Ceiling panels, in our next generation sustainable stores, are made of 100% recycled materials, and the flooring is 97% natural

linoleum. Mummified plants, that do not require watering, were used on the green wall created with the environmental concept. We aim to reach a recycling rate close to 100% by using the old furniture from the decorated stores in the digital business partner channel.

We are committed to the circular economy approach and recognize that we must not

only utilize the waste generated within our company but also the waste generated by the electronic devices. We are providing various services to our stakeholders to make the devices a part of the circular economy. By **collecting, repairing, reselling, and fully recycling** the devices, we ensure resource efficiency and reduce our environmental footprint caused by waste.



# E-waste and Circular Economy



## Repair

We take a life cycle management approach, which includes extending device life through repair, refurbishment, and resale before encouraging responsible recycling of devices at the end of their life cycle.



## Resell

To encourage customers to repair or sell their old devices, we run device buy-back schemes and repair services such as **"Refurbished Second-Hand Device Campaign"** and "Reuse, Resell, Recycle".



## Refurbish

We ensure monetary savings and reduce our environmental impact by refurbishing and reusing landline equipment.

## Reuse, Resell, Recycle

In line with our target to reuse, resell or recycle 100% of our network waste, we adopt a "Reuse, Resell, Recycle" approach. To address the e-waste problem, we refurbish and reuse old equipment, resell and utilize the surplus, and recycle waste that cannot be resold or utilized, bringing them into the circular

economy as secondary raw material. Thus, we utilize idle, operational, or defective electronic equipment on sites and in warehouses without reducing their added value. In the 2021/22 fiscal year, 3,227 tons of e-waste was recovered/recycled, and 33.4 tons of e-waste was reused. As a result, **99.95% of our total e-waste was made a part of the circular economy.**

## Refurbished Second-Hand Device Campaign

At Vodafone, for about a year, we have been offering our customers the opportunity to utilize their old phones in our stores with the refurbished second-hand device campaign. We expanded this experience this year to the Vodafone Online Store, where unused or outdated devices are prepared to be reused and delivered to users, while devices that cannot

be used are dismantled for spare part services or recycled. With this project, we contribute to environmental sustainability by reducing electronic waste generation, based on the circular economy approach. Furthermore, we sell defective or damaged unused network equipment as second-hand, and we maintain initiatives such as the smartphone rental service and mobile phone exchange campaign.



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# Environmental Benefits from Products and Services

According to the Intergovernmental Panel on Climate Change (‘IPCC’) report<sup>3</sup>, digital technologies support the creation of a carbon-free economic model by increasing energy and material efficiency. At Vodafone, we believe that one of our important contributions to the fight against climate change is enabling our customers to reduce their environmental footprint by using our digital technologies and services. In line with

Vodafone Group’s commitment to assist customers in reducing carbon emissions by 350 million tons until 2030, we, as Vodafone Turkey, assist customers in reducing emissions through our IoT service solutions.

## Supporting Our Clients to Reduce Their Carbon Emissions

Our IoT solutions have the potential to assist

individuals, and small and medium-sized businesses in quickly adapting to the structural changes they will face in the upcoming years as a result of the climate crisis. Thereby, preventing social injustices in the transition to a green and carbon-free economy. With these solutions, we are helping our stakeholders to become more innovative and resilient, and supporting them to switch to sustainable and circular business models.

### IoT solutions that Vodafone Turkey offers to its customers:

In 2022, we helped our customers to avoid a total of 158. 552 tons of CO<sub>2</sub>e emissions with our IoT service solutions such as telematics for logistics and fleet management for buses, taxis and cars; smart devices that prevent waste collection vehicles from making unnecessary trips by alerting them when the

bins are full; smart meters that routinely monitor consumption (gas, electricity or water) and thus enable more efficient management; electric vehicle charging points; and smart devices that reduce trips to and from hospitals by allowing chronic or high-risk patients to be monitored in their own homes. **This saving is equivalent of planting almost 990 thousand trees.**<sup>4</sup>

#### Smart Metering

- **Transparency** by regularly monitoring consumption
- **Energy savings** by remotely optimizing consumption
- **Saving awareness** with regular follow-up

#### Smart Logistics and Fleet Management

- **Route optimization and emission** reduction by avoiding traffic
- **Real-time feedback** on driving performances and behaviors
- **Fuel efficiency** with optimized delivery and shipping route for logistics vehicles

#### Electric Vehicle Charging

- IoT-enabled EV charging points interact with electric vehicles or driver mobile apps to direct drivers to the most appropriate EV charging point, **giving drivers the confidence to carry out more journeys in electric vehicles.**



#### Smart Bin

- IoT-enabled units within smart bins communicate with waste collection services to **prevent unnecessary journeys being made by waste collection vehicles.**

#### Health Care

- **Reducing travel to and from hospitals** by allowing chronic or high-risk patients to be monitored in their own homes through connected devices.

### Reducing Carbon Emissions

<b>Total emissions prevented as a result of IoT technologies and services (ton CO<sub>2</sub>e)</b>	<b>158.552</b>
Scope 1 and Scope 2 Emissions (ton CO <sub>2</sub> e)	12.723
<b>Ratio of emissions avoided by our customers to our own greenhouse gas emissions (%)</b>	<b>12.4619887</b>

<sup>3</sup>IPCC, 2022.  
<sup>4</sup>According to Trees for Life, planting 6 trees is equivalent of 1 ton of CO<sub>2</sub>e emission (www.treesforlife.com).



# Environmental Benefits from Products and Services

## Eco Rating

Together with Europe’s leading mobile operators, Vodafone Group has launched the Eco Rating initiative to help consumers identify and compare the most sustainable mobile phones and to encourage suppliers to offer devices with lower environmental impact. Eco Rating uses information provided by device manufacturers to apply a uniform and objectively consistent assessment methodology across 19 different criteria, resulting

in each device being given an overall environmental rating score out of 100, indicating how well it performs environmentally throughout its whole life cycle. [Please click here for more information on Eco Rating.](#)

## Eco-SIM Card

As Vodafone Turkey, we switched to half-size SIM cards in 2014 and halved the amount of plastic our customers use. As part of our environmental

commitments, we introduced Eco-SIM cards made from recycled plastic in FY22, removing the need for plastic SIMs entirely. Customers can replace their SIM cards at their local Vodafone store with Eco-SIM cards, which come in recyclable paper envelopes. Also, when it is necessary to replace a SIM card, we offer our customers Eco-SIM cards. As Vodafone Group, we hope to minimize the amount of pure plastic consumed each year and help our customers to reduce their environmental footprint, by gradually boosting the use of Eco-SIM cards.





# Social: With Technology and Humanity, Together We Can



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# Social Risk and Sectorial Trends

The COVID-19 crisis has had a significant impact on numerous industries, but it has also given the global economy's digital revolution a huge boost. Changes in consumer behavior brought on by the digital transformation have increased data traffic and sharpened the focus on data privacy and security.

Another impact of the COVID-19 crisis has been the shift in the way of doing business. Flexible working practices, remote working management and many other practices that transform the workforce became one of the areas that the telecommunications sector must adapt, both in terms of the services it provides and its own employees. Moreover, in the post-pandemic world, employee health and wellbeing became one of the most questioned issues in the workforce.

Finally, looking at the services needed within the sector, even though we have been in the Information Age for more than 50 years, processes are continuing to be digitized and further innovation categories are still being created to increase efficiency. This is an important indicator of the fact that the products and services offered by the telecommunications sector are likely to diversify and increase competition.

## Impact Factors

**Workforce transformation**

**Customer expectation in privacy, access and transparency**

**Customer demand shifting towards innovative high-end,high-tech products**

**Potential health impact from telecom equipment and devices**

We recognize the importance of understanding sector-specific social risks and focus areas, and accurately assessing their impact on our business. As a result of the analysis conducted with SASB Materiality Map, S&P Risk Atlas and MSCI ESG Industry Materiality Map, the following are considered to be sector-specific social risks:

- **Data Security and Privacy**
- **Workforce Management**
- **Health and Safety**
- **Social Cohesion and Accessibility**

## Assessment of International Initiatives in Terms of Social Risk and Focus Area

Sustainability Initiatives	Data Security and Privacy	Workforce Management	Health and Safety	Social Cohesion and Accessibility
SASB Materiality Map	✓			
S&P Risk Atlas	✓	✓	✓	
MSCI ESG Industry Materiality Map	✓	✓		✓

# Digital Solutions That Transform Lives

We believe in the power of uninterrupted connection and digital services to strengthen economic and environmental performance while leading the transformation of lives and digitalization of businesses. We are connecting individuals and communities by providing fast data flow with our mobile and land-line networks.

We are supporting agricultural productivity in Turkey with the **Digital Agriculture Solution**. We offer efficiency-oriented solutions for agricultural companies by analyzing the data obtained from air and soil via sensors and modules and prevent damage, especially to agricultural products and equipment with early warnings. Thanks to these applications, we ensure efficiency in production and improvement in

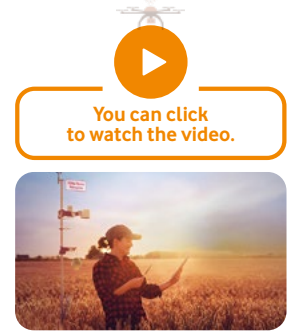
quality. In addition, with the **Red Energy IoT** solution, we respond to the needs of businesses to control their energy consumption and ensure energy efficiency. With the **V-Hub** platform, we inform SMEs about digital solutions and offer them digital solutions that transform lives by providing consultancy with the aim of preparing them for the future.

## Digital Agriculture Solution

As part of the Digital Agriculture Project carried out by Vodafone Business, the digital business partner of businesses, and Türkiye İş Bankası, the number of Digital Agriculture Stations established across Turkey to benefit producers of various crops such as olives, tomatoes, cherries, strawberries, and potatoes has reached 27 since September 2019.

Digital Agriculture Stations, which analyze the moisture and quality of the soil by calculating the evaporation in the field while instantly monitoring the weather, also provide early warnings for pests, frost, storms and natural disasters. This product, which recommends the best times for agricultural procedures to farmers, including irrigation and fertilization, also suggests seed planting time based on soil temperature and moisture, and helps to create fertilization, spraying, pruning and harvesting plans. With the Digital Agriculture Station, agricultural data can be instantly monitored, stored, analyzed and reliably reported. The system, which generates a 14-day weather forecast report specific to the land, and sends early warnings to farmers online, ensures increase in productivity and savings by enabling timely interventions.

In total 57 million TL economic contribution was achieved by providing services to 12,700 producers in the geographies covered by our Digital Agriculture Stations. 23 million TL of the cost saving came from the correct use of fertilization, spraying and irrigation with instant alerts provided by the digital agriculture station, while 34 million TL of the cost saving came from the increase in yield created by the regular analysis of data from digital agricultural station sensors related to soil, air and pests and taking action against diseases and crop loss beforehand. The economic contribution from Digital Agriculture was generated from tomato, olive, cherry, peach, plum, vineyard, field crops, strawberry, lemon and potato grown in Bursa, İzmir, Mersin and Afyon.



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# Digital Solutions That Transform Lives

## V-hub

We introduced a new service to support SMEs in the business world where digital transformation is accelerating and the hybrid working model has become permanent with the vision of leading the digitalization of businesses. We launched the new digital consultancy platform V-Hub with the aim of informing SMEs about today's digital needs and preparing them for the future.

We will provide services to SMEs in 3 different areas: "Digital Competencies and Productivity", "Digital Security", and "Remote Working". In the "Digital Competencies and Productivity" area, SMEs will receive information on key elements such as ensuring productivity, attracting customers to the website, providing online services and improving existing propositions. In the "Digital Security" area, SMEs will attain information on online security and cyber fraud, with advice on what kind of protection they need, how to stay safe online and how to communicate risks to employees.

In the area of "Remote Working", SMEs will be guided on how their employees can work collaboratively, how to keep them motivated and what positive steps can support employee well-being. We are aiming to contribute to 50 thousand people in 1 year with the V-Hub platform.

## Red Energy

In line with our vision of leading digitalization, we started to offer the Red Energy solution to companies that need to remotely control their energy-consuming devices. Red Energy is as an end-to-end IoT solution that allows companies to remotely control their energy consumption data using a single screen. The solution collects electricity consumption data, transmits the collected information to the central software, creates instant or historical reports, generates alarms, makes comparisons, and informs the user.

Thanks to Red Energy, **which reduces electricity consumption by up to**

**30%**, we help businesses to accurately report and control their energy consumption instantly. We respond to businesses' needs such as reducing energy consumption through proper resource management and remote control of equipment such as ventilation and lighting.

With the Red Energy solution, we work with businesses with high energy consumption such as air conditioners, lighting, coolers/freezers, production machines, electronic devices. The solution enables companies to remotely control air conditioners, automatically adjusting to the desired temperature, and also to remotely control indoor and outdoor lighting with a single button. We help businesses to monitor the energy of electricity consuming devices, to make comparative reports between branches and machines, to monitor the current and historical energy consumption of machines remotely, to prevent unwanted consumption with reactive energy tracking and alarm systems.



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# Technological Innovation

In a world where new technologies such as artificial intelligence, robotics, and virtual reality are rapidly emerging, automation and digital solutions are an indispensable part of technology-oriented industries like ours. We are aware that digital technology plays a key role for sustainability and we are committed to the digitalization of the customer experience. Technology has a significant multiplier effect in transition to low carbon economy. Technological advancements create a wide range of growth opportunities, including finding solutions to simplify the customer experience, making continuous and integrated demand planning, and creating new business areas.

## My Vodafone App

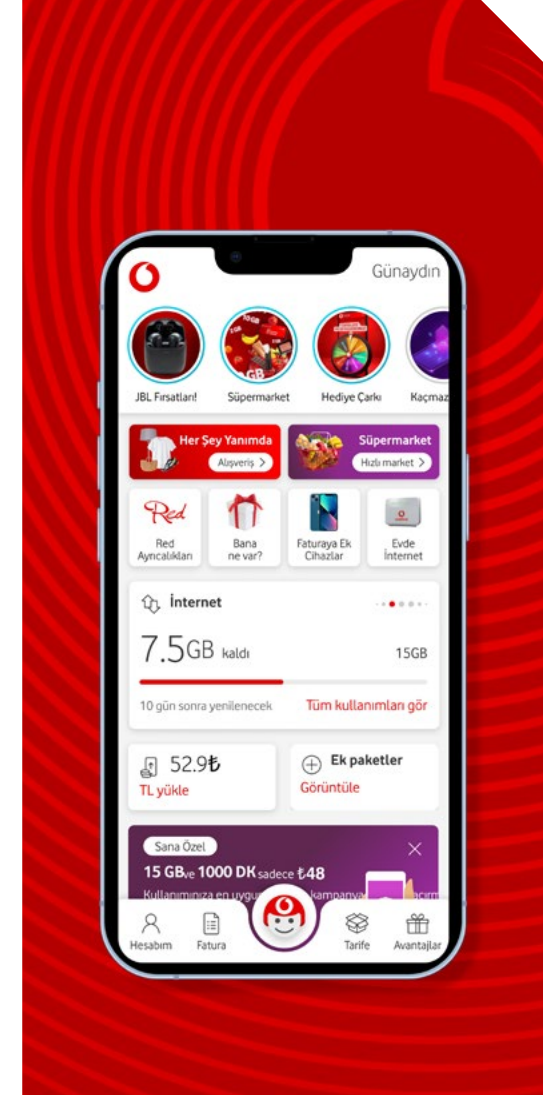
My Vodafone App, which enables our users to easily satisfy all of their demands from a single platform, continues to make our users' life easier while gaining more and more attention each day. My Vodafone App reached **15 million monthly active**

**users and 245 million visitor traffic in the last 5 years.**

The App allows our customers to perform many digital transactions instantly. With the application, our subscribers can achieve the mobile transactions they need without going to dealers or using the call center, enabling them to digitalize, save time and reduce costs. Vodafone's mobile customers can use the application for many transactions such as paying bills, inquiring bill details, loading TL, learning about tariffs and packages that are used and available, and checking remaining minutes and data in their package. Home internet customers can also use the app's many features such as bill viewing and payment, reviewing commitment details, and easy and fast wireless connection sharing via QR code. My Vodafone App provides access to many services such as My Vodafone App World of Opportunities, Supermarket Yanımda, Her Şey Yanımda, Gift Wheel and Vodafone Insurance.

Vodafone's personal digital assistant TOBİ also provides instant support to My Vodafone App users.

We have also launched a new era in digital customer experience. Users who want to transfer their postpaid line to Vodafone or apply for a new postpaid line can do these transactions with face recognition and Near Field Communication (NFC) technology via the My Vodafone App. This technology, which was previously available to Vodafone Simple customers, can now be used by anyone who wants to switch to Vodafone. **Offering our customers, a 100% digital and paperless experience,** we also provide special privileges for online applications. We continue our efforts to make My Vodafone App, a dynamic, super app that can be accessed and used for any transaction, from e-commerce to insurance, and from finance to gaming.



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# Technological Innovation

## Vodafone Pay and Mobile Payment with Her Şey Yanımda

We developed Vodafone Pay, a mobile wallet application that is not actively involved in the banking ecosystem and that users can use independently of the operator. We aim to implement innovative ideas in financial technology, and develop innovative financial services such as expanding the use of open banking systems with this App. At the same time, we facilitate our customers' payment experience and offer them the opportunity to add their expenses to their mobile bills. Thanks to mobile payment feature, we aim to be a platform that will be preferred by users who do not have or use credit cards and who need different payment methods.



We started mobile payment for the Vodafone online shopping platform: Her Şey Yanımda. Users do not have to use a credit card when shopping on Her Şey Yanımda and can pay for all their purchases by adding them to their invoices with a single click. Her Şey Yanımda is also the first purpose-led online shopping platform. In this context, Vodafone donates 3 TL from every purchase made by its customers on Her Şey Yanımda to TOÇEV to contribute to the education expenses of a child.

## TOBI

Our artificial intelligence based personal digital assistant, TOBI, developed to provide our customers with the best digital experience, is now serving Vodafone Home Internet customers. TOBI, which understands natural speech and enables users to carry out transactions by chatting within digital channels, **reached 4 million unique users monthly and engaged in a total of 10 million chats.** The digital assistant, which can respond to all kinds of expectations and questions, performs most of the transactions requested by customers quickly and without any error. Through TOBI, our customers can obtain information about their invoice details, current tariffs, tariff changes or additional package purchases, dates of current campaigns, remaining usage and usage details. Following our individual and corporate customers, TOBI has now begun to serve our home Internet customers, making it the first and only digital assistant capable of providing end-to-end support for home Internet service.



## Vodafone Electronic Agreement (VES) Platform

With our vision of leading Turkey's digitalization, we moved our legal and commercial processes to the electronic environment. With the Vodafone Electronic Agreement (VES) platform, which was developed in collaboration with Inovaktif

Information Systems and Vodafone teams and whose intellectual property rights and source codes belong to Vodafone Turkey, we carry out all kinds of agreement request, preparation, negotiation and post-agreement processes digitally. VES, which has a user-friendly structure that can be accessed from anywhere, serves as an innovative platform that Vodafone Turkey uses itself and offers as a product to its customers. VES offers its users an eco-friendly, secure and paperless process experience where they can log in and work from any device. VES also helps us and our customers to reduce our carbon footprint by eliminating the use of paper, courier service and stationery.



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# Accessibility

To accomplish our ambition to connect everyone to a sustainable future, we believe in investing in digital participation and accessibility of our products and services. With our uninterrupted Internet network, we help millions of people make the most of life in the digital world. We contribute to sustainable development with the technologies and applications that 4.5G enables today and 5G will make possible in the future.

To close the digital divide, we are working to provide accessible mobile devices and services for everyone, ensuring inclusive coverage and enabling the adaptation of people who are not currently using the Internet. We offer broad coverage and uninterrupted connectivity on 4.5G, ensuring fair access for both our individual and corporate customers.

## High Performance in 4.5G

We use technology effectively to provide our customers with high-quality connectivity experience without any interruption. The test results of the German independent consulting and engineering company Umlaut in its 2022 report also support us. **According to the report, we offer our customers wide coverage and uninterrupted connectivity with our superior quality 4.5G infrastructure, with a total score of 862 out of 1000.** This enables us to offer a competitive performance with a 91% reliability rate on the chosen route, and in addition to offering the best 4.5G experience based on anonymized data collected from all over Turkey, we can guarantee the lowest ping in mobile games. We will continue to work to meet our customers' needs in the best way possible.



# Equal Opportunities in the Digital World

We are striving to provide equal opportunities by utilizing advantages of the digital world. We contribute to equal opportunities by developing digital solutions and projects that will help women and young people. We continue to pursue our target to become a pioneer of social change and development with the projects we carry out at Vodafone through Vodafone Turkey Foundation.

## Women's Empowerment

In line with our goal of becoming a pioneer of social change and development, we support women's empowerment by using mobile technologies to improve their quality of life through programs that contribute to socio-economic development, improve health and well-being, and advance education, skills and entrepreneurship.

### Connected Women

We launched the Connected Women project in cooperation with Vodafone Turkey Foundation, General Directorate of Lifelong Learning and General Directorate of Turkish Employment Agency. We aim to increase the digital skills of women over the age of 18, bringing together the power of technology and women's potential. Last year, we provided 24 hours of Digital Literacy and 40 hours of Digital Marketing training to more than 9 thousand women in 13 provinces with 140 trainers. 63 female trainees completed their basic and orientation trainings at Vodafone Customer Services and started to work remotely and received their first calls. We aim to provide training to 12 thousand female trainees until the end of March 2023 through this project.

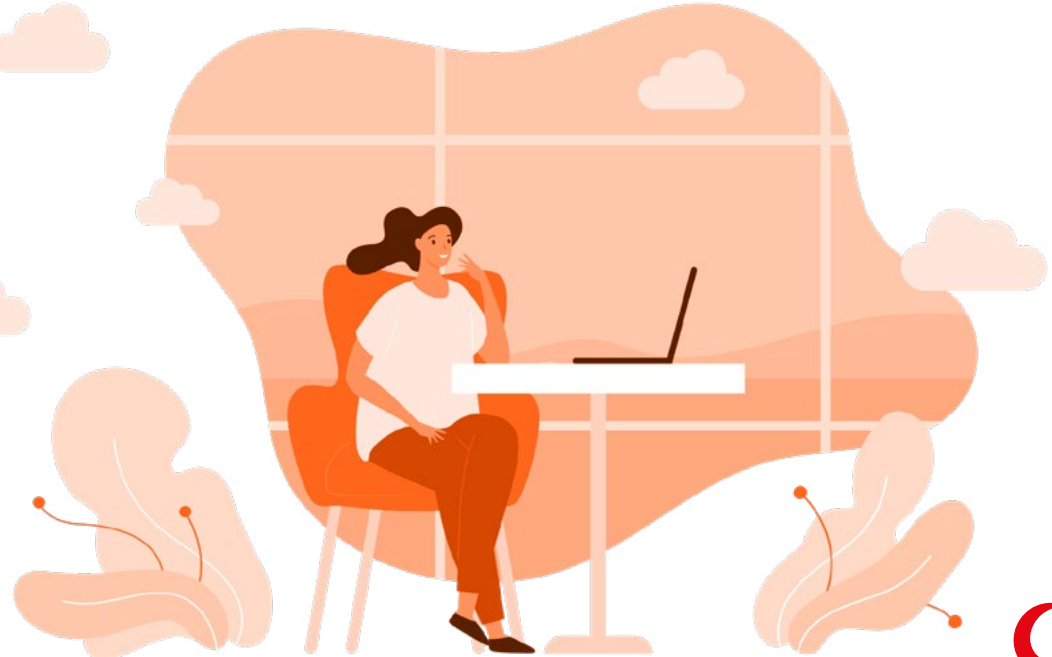
### Easy Rescue App

The Vodafone Turkey Foundation, which works to pioneer social change and development, launched the Easy Rescue smartphone application in 2014 with the help of the Ministry of Family and Social Services. The app has now become a crucial weapon in the battle against violence against women. Easy Rescue, which enables

women to easily alert law enforcement or their relatives when they are victims of violence, has been downloaded 372 thousand times to date and reached 1,000 monthly active users. "Gender equality" themed training videos and the Violence Awareness Test, prepared in consultation with experts, were added to the application. In the training videos, each lasting 1-3 minutes, women are informed on topics such as "Why Gender Equality", "What is Gender Equality", "Biological Sex and Gender", "Stereotypes" and "What Can I Do?". The Violence Awareness Test aims to provide women with information on types of violence.



You can click to watch the video.



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# Equal Opportunities in the Digital World

## #BenVarım

We strive to show that women also exist in fields that are typically associated with men and assumed to be dominated by men through the "Ben Varım" movement. Aiming to dispel sexist stereotypes, we encourage women to say "Ben Varım" (I am here) in any field they want to be. In a short period of 3 months, we achieved an awareness score of 33% "#BenVarım" with our call for "100% equality with #BenVarım". Moreover, we have been supporting Beşiktaş Vodafone Women's Football Team for the last 10 years; aiming to raise awareness about women's football, which includes front-of-shirt sponsorship. The documentary "Ben Varım", in which we featured the stories of Beşiktaş women soccer players, achieved a significant success by reaching more than 3.3 million views on YouTube. In addition, we will contribute to the football education of a total of 200 girls with the proceeds from the sale of the jerseys we have specially designed and produced for our 10th year anniversary.

## Youth Skills and Employment

We focus our efforts on providing young people with opportunities that integrate technology and learning in the

workplace. We encourage young people and endeavor to create a workplace where they can be themselves in line with our guiding principles: "Invest in yourself, generate new ideas, try-error, and question."

## Coding Tomorrow

Within the scope of the project carried out in cooperation with the Vodafone Turkey Foundation and Habitat Association, children aged between 7 and 14 in Turkey are given theoretical and practical training on topics such as introduction to programming, algorithm logic, developing applications, creating stories and developing games under the supervision of volunteer trainers. As part of the Coding Tomorrow project, which aims to prepare young generations for the digital future, this year we focused on equal opportunities in education. To increase access to technology for students in rural areas, we established fully equipped technology classrooms in 30 village schools with 550 volunteers. We started to give trainings on technology, especially coding, in classrooms with projectors, 3D pens, computers, 3D printers, STEM kits, Zoom communication and activity tools. The technology classrooms established in village schools can also be used as EBA (Education Information Network) Support Points. At the World Information Society

Summit, organized by the UN, we made a presentation, telling the five-year journey of the project. To date, the project has reached over 280 thousand children in 81 provinces, with a total social value of approximately 14 million TL in the last year. For every 1 TL invested in the project, 7.7 TL worth of social benefit was created.

## Discover Young Talent Program

Since 2008, the Discover Young Talent Program gives young people the opportunity to work full-time in Vodafone Turkey's sales, marketing, technology, finance and human resources functions. This year, more than 7 thousand young people from all over Turkey applied to the program, and the selected new graduates joined work life. This year, for the first time, we have designed a program in which the specialization pathways we created with a skill-oriented approach are enriched with rotations and training. As Vodafone, we say, 'invest in yourself, generate new ideas, try-error, and question' and we attach importance to the development of skills. We support our new graduates to acquire new skills with 14 development journeys on 14 pathways and 2 different routes along this journey.



You can click to watch the video.



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# Investing in Society

## Vodafone Turkey Foundation

Vodafone contributes to social development through the foundations it has established in the countries where it operates. Since 2007, through the Vodafone Turkey Foundation, one of the 27 Vodafone Foundations, we contribute to socioeconomic development and support societal progress by using the power of communication.

For a more equal and just future, we harness the potential of communication technologies, and create value by using technology to serve to everyday life. For 15 years, we have been serving the society by supporting projects that generate social benefit.

We have funded a total of 16 projects with

a real value of 105 million TL over the course of 15 years by developing various initiatives with an emphasis on entrepreneurial projects, and technology and digitalization-based training for women and children.

As Vodafone Turkey Foundation, we have been successfully carrying out projects for women's empowerment for 11 years. In this process, we reached nearly 61 thousand women through Vodafone Turkey Foundation projects such as Women in Technology Movement, Women First in Soma, Easy Rescue, Women First in Entrepreneurship and Connected Women, and invested a total of 8.7 million TL.

You can find more information on Turkey Vodafone Foundation projects in the [Environment](#) and [Social](#) sections.

### Vodafone Turkey Foundation Advisory Board

The Advisory Board of Vodafone Turkey Foundation is comprised of Leyla Alaton, Yavuz Canevi, Üstün Ergüder, Ebru Özdemir, Hüsnü Özyeğin, Ali Sabancı, Serpil Timuray, Arzuhan Doğan Yalçındağ and Meral İnci Zaim and convenes twice a year to exchange the activities carried out within the foundation, improve these practices and guide future efforts. We would like to thank our advisory board members who share their valuable knowledge and ideas with us to develop the Foundation's projects, create its strategies and draw a roadmap for the future.



### Volunteering

We carry out the Vodafone Volunteers program to improve volunteering awareness in employees, and to encourage participation in corporate social responsibility events. We give two days off per year for our employees to enable them to support projects, particularly those developed by the Vodafone Turkey Foundation. In 2021, 230 employees worked as volunteers in the activities carried out by the Foundation.



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# Acting with Dedication for a Diverse and Inclusive Workforce



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# Diversity and Inclusion

Our employees play an important role in keeping our operations on track with our vision of leading Turkey's digital transformation and providing a high-quality experience to our customers. As Vodafone Turkey, we will continue to be a company that is built on happy and competent employees.

To this end, we offer an inclusive, equal and fair working environment where everyone has the opportunity to develop, and we stand by our employees every step of the way to help them realize their potential. **You can access our Diversity and Inclusion Guide [here](#)**, which we have developed to strengthen the Diversity and Inclusion culture, which is the assurance of a professional and fair working environment where all individuals are treated with respect.

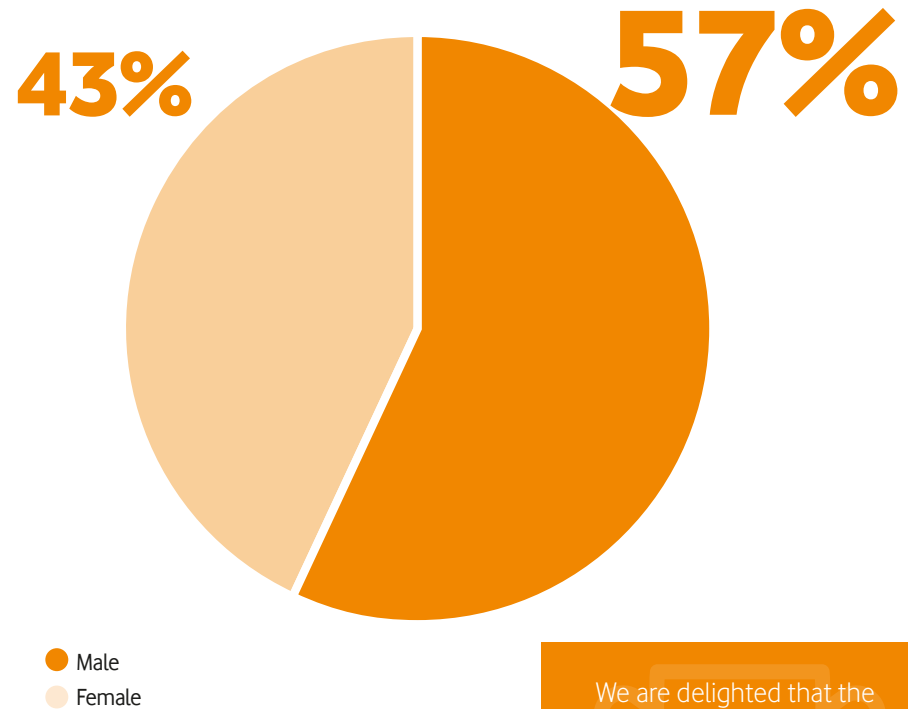
At Vodafone Turkey, we say, "Inclusion for All" and we adopt a work culture that does not discriminate based on religion, language, culture, gender, sexual orientation, race, or ethnicity, and that provides equal opportunities to everyone in the Vodafone Turkey team consisting of 2,959 people. We believe in the power of diversity and we know that diversity is only possible by building an inclusive culture where everyone can be themselves. We

embrace gender equality in all areas and maintain our goal of keeping the ratio of female employees above 40%. With our female employee ratio of 43% in the 2021/2022 fiscal year, we have been achieving this target for the last 5 years.

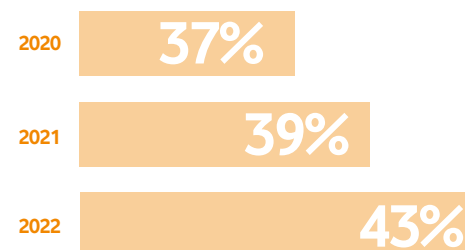
Women make up 51% of the new hires this year. We also have a target of hiring 60% women in technology functions and 50% women in other functions for all young talent and internship programs.

We are aware that one of the biggest problems particularly experienced by women in their careers is the glass ceiling. We know that providing equal opportunities to women in the business world plays an important role in the development of a sustainable economy and, in parallel, in strengthening our company. Therefore, one of our main objectives is to increase the proportion of women in management and to shatter the glass ceiling in accordance with our principle for ensuring equal opportunity, not only in recruitment processes, but also throughout the entire careers of our employees. Striving in line with this purpose, **we increased the ratio of women in management from 39% in 2021 to 43% in 2022.**

## Employee Ratio by Gender



## The Ratio of Women in Management



We are delighted that the innovative practices we have developed in the field of Human Resources have been recognized with an award by the Great Place to Work Institute, one of the world's most respected research institutions.



# Acting with Dedication for a Diverse and Inclusive Workforce

## Global Parental Leave Policy

We prevent women from experiencing difficulties in the working environment due to parenthood and support them to continue their careers uninterrupted after their maternity leave. In addition, we have expanded the scope of the global parental leave policy to cover both spouses in order to contribute to the work-life balance of all employees regardless of their gender. Accordingly, since 2020, we have been granting 16 weeks of paid leave to our employees who have children regardless of their gender. In the fiscal year 2021/22, a total of 124 employees benefited from parental leave, 118 of whom returned to work after their leave ended.

## Supporting Employment of Women In Technology

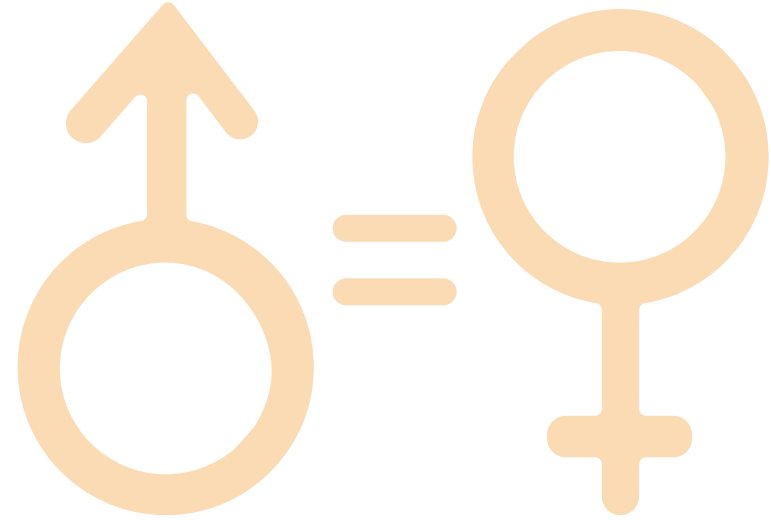
As in every field, we are working to increase women's employment in technology roles. We started the Women in Sales Internship Program for female senior university students who wish to pursue their career in sales in the technology sector, as well as the Women in Technology Internship Program to boost the proportion of female employees in the

technology functions. This year, 61% of the 74 students who started the internship programs in February were women.

## Equalmeter

With the Equalmeter project, which is a language transformation project implemented to prevent use of sexist language, we draw a red line over the use of language that is biased against women in digital publications. Equalmeter is a technology that understands both word-based and text-based Turkish. 2,800 columns have been analyzed so far with Equalmeter, and we have reduced the rate of sexist words in these columns from 11% to 0%. We integrated the Equalmeter into the e-mail system of our company, which helps us to raise awareness by sharing instant feedback with all our employees regarding discriminatory discourse in business correspondence.

We received an award in the "Gender Equality Awareness" category of the Women-Friendly Brands 2022 Awareness Awards with our Equalmeter language transformation project.





# Talent Management

Talent management is crucial to achieve our company's strategic goals. At Vodafone Turkey, we put an emphasis on investing in talent management to recruit new talents and retain existing talents, we focus on supporting the development of our existing employees and working on retaining high-potential talents. Please [click here](#) for more information on Vodafone Turkey's talent management approach.

We take pride in helping our employees to reach their full potential and build their careers with us and strive to offer a happy and productive work environment. Approximately 47% of our existing employees have been with our company for at least 5 years. In addition, one of the key indicators we monitor is our employee turnover rate, which stood at 21% in FY21/22.

We attach high importance to nurture future leaders among our own team members who are used to our business practices. We give priority to our employees by first announcing open positions within the company through the Red Experience application. Accordingly, in FY21/22,

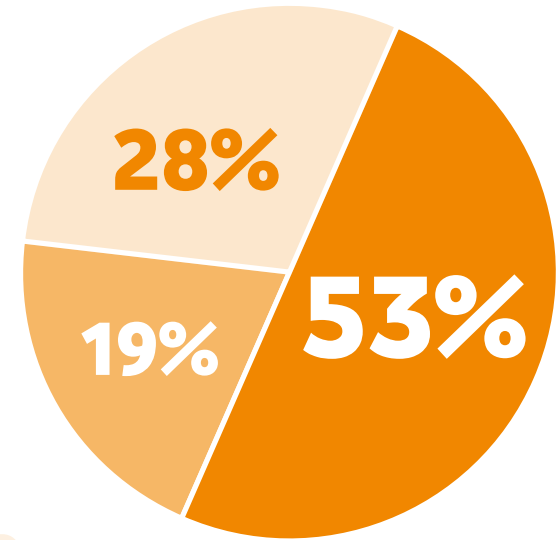
53% of positions were filled with internal candidates.

## Performance Management

We believe that performance management is as important as talent management to promote a corporate culture where high performance and talent are acknowledged and nurtured for leadership positions. Vodafone Performance Improvement process is composed of four main steps: target setting, quarterly interviews, half-year review and end-of-the-year review. During the process, employees and managers convene regularly throughout the year, reviewing the employees' strengths and areas of development. Personal development plans for long-term career goals are determined and employees' individual performance is evaluated in the light of the targets set at the beginning of the year. The outputs of the performance process provide input to other critical human resources processes such as training and development, talent management, remuneration management and rewarding, and career management. Furthermore, we use a common performance

management system at the global level, which we call Performance Development. Our performance management system enables our employees to set clear and well-defined personal goals in parallel with their strategic goals and guides employees in ensuring that the path they follow towards the achievement of these goals is in line with Vodafone's work principles. Please [click here](#) for more information on Vodafone Turkey's performance management approach.

We believe that a well-executed compensation system will directly contribute to talent and performance management, and we consider the compensation model as a tool for recruiting suitable talents, retaining existing talents and rewarding our employees fairly. In Vodafone Turkey, compensation includes a base salary, a bonus system in line with the position (based on sales, annually and quarterly), a comprehensive and flexible benefits package and an instant rewarding system. Please [click here](#) for more information about the compensation system of Vodafone Turkey.



### Employees per Work Time

- 0-5 years
- 5-10 years
- 10 years and more



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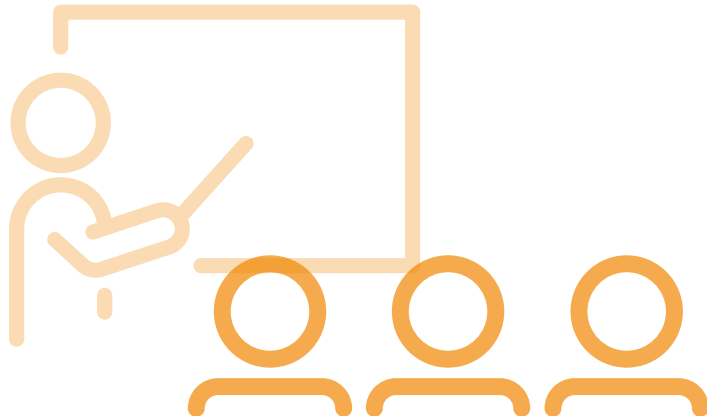
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# Talent Management

## Red Academy

Thanks to Red Academy, which serves as Vodafone Turkey's development center, we provide development opportunities in mobile technologies and digital fields to many stakeholder groups, including our employees, dealers, business partners and customers. During the reporting period, we provided 89,253 person\*hours of training to Vodafone employees in total, corresponding to 26.28 hours per employee. In addition, we provided a total of 348,713 hours of training to more than 9,000 employees working in our dealers and customer services, reaching more than 38 hours of training per employee.



## Coaching Programs

As Vodafone Turkey, we have been supporting the development of our employees with coaching programs since 2017 and mentoring programs since 2014. As a result of the evaluations conducted together with our business partners in Human Resources, we provide internal or external coaching and mentoring support to our employees according to their needs. Within the scope of the coaching program, which falls under two main headings as External Coaching and Internal Coaching Programs, we carried out approximately 30 External Coaching and 25 Internal Coaching processes in the fiscal year 2021/22.

## ReConnect

Vodafone Turkey has recruited a total of 27 female employees as part of the Vodafone Group ReConnect program, which is launched globally to support the return to work for women who took a career break. With the program, we create an opportunity for women who take a career break to adapt to corporate life more easily with the buddy system, coaching, and mentoring support, as well as give them the ability to balance work and personal life with flexible working hours and support their return to corporate life and their career goals.



### Red Academy Development Programs

Onboarding programs	Technical training programs
Leadership training	Competency trainings
Culture and exchange programs	Agile development programs
Team coaching programs	Online development resources
Upskilling and Reskilling Academy programs	Other development solutions



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# Occupational Health, Safety and Employee Wellbeing

Providing a healthy and safe work environment to our employees and business partners is among our fundamental duties. In line with our commitment to "Excellence in Occupational Safety and Zero Accidents", we implement practices that will set an example for the telecommunications industry in the field of occupational health and safety (OHS).

We encourage all stakeholders in the value chain to practice high safety standards and to act responsibly at all times.

## OHS Practices at Vodafone

Occupational Health and Safety Senior Manager, the top executive in the field of OHS, serves only two reporting levels below the CEO. There are 60 representatives in the 71 OHS boards in total, which are located at our headquarters and other regions where we carry out our operations in Turkey. The boards convene regularly in every two months. We track OHS targets at senior management and Group level by preparing annual plans.

We have established occupational safety standards in the telecommunication sector based on our belief that human life is incomparable to any other business target. These standards which are compatible with

international systems such as the International Safety Rating System (ISRS) and ISO 39001 Road Traffic Safety Management System, guide many organizations in other sectors in terms of occupational safety.

We provided 49,384 employee\*hour OHS training in total to our employees in the reporting period, corresponding to 8 hours per person. We inform all our employees about traffic accidents and take action to minimize accidents with the DrIVeSafe application launched by Vodafone Group. We investigate all accidents and near misses within 24 hours at the latest and enter them into the system. This global system enables us to continuously improve accident investigation processes and increase the efficiency of reporting processes. Please [click here](#) for more information about the OHS approach of Vodafone Turkey.





# Occupational Health, Safety and Employee Wellbeing

## OHS for the Contractors

In addition to the importance we attach to occupational health and safety at Vodafone, we also focus on ensuring that the employees in our entire value chain work in a safe environment. We develop and regularly monitor the standards for all our business partners, contractors and their subcontractors. Before deciding to work with contractors, we evaluate them in detail in terms of their OHS adequacy. In the contracts we make with the contractors we decide to work with, we require compliance with Vodafone OHS standards, and we include sanctions against OHS non-compliances and field work safety audits in the contracts. We also provide OHS training to contractors. In the reporting period, we provided 37,416\*hour OHS training in total to our contractors. Through site visits to the base stations, we evaluated 33 contractors and identified 73 violations.

**The number of violations decreased by 26% compared to 2021.**



# Occupational Health, Safety and Employee Wellbeing

## Employee Wellbeing

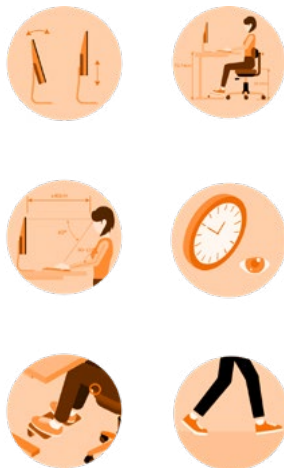
### Wellbeing Program

We value psychological health and wellbeing of our employees in addition to their physical health, making sure that they feel happy and good. With the "Hepli" Program, we carry out different activities to ensure that employees are better in mental, physical, social, financial and environmental aspects. During the year, we carried out activities such as ergonomics and exercise videos, interviews with the expert guests, and a psychological support line. We continue to encourage our employees in sports and health topics with the good life competition we organize every year in October and offer the winners of the competition the opportunity to work with a nutritionist and personal trainer.

### Next Generation Working

We aim to implement a model that prioritizes employee experience and flexibility, combining the efficiency of remote work with the synergy of office work. We believe that by using this model, we can combine the freedom

and efficiency of remote work with the shared work culture and social environment that comes with being in an office. We switched to a hybrid working model in September 2021 and began to offer our employees the opportunity to experience the benefits of working both remotely and in the office. In our hybrid working model, 40% of the total working time is spent in offices, and 60% is spent working remotely. In addition, we offer various benefits ranging from digital meal cards to transportation allowances and ergonomics support to improve our hybrid model in line with the needs of our employees.





# Governance:

Acting ethically,  
lawfully and with  
integrity



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# Governance Risk and Sectorial Trends

Companies must keep up with social, environmental, economic, and technological changes and regulations to maintain success in a rapidly changing world. Adopting an ethical and transparent management approach has become another necessity due to the impact of transparency and accountability principles on economic performance and brand values of companies.

Companies today are expected to be in constant communication with their employees and stakeholders, to leverage the power of open communication, and to incorporate ethical and transparent management into their governance approach.

According to the World Economic Forum's The Global Risks Report, risks must be addressed, identified, and managed in an integrated manner that includes economic, social, and environmental components. Therefore, crisis management should be prioritized, potential threats to brand and reputation should be identified, and solutions to eliminate such threats should be devised. Identification and prevention of any misconduct, anti-corruption, anti-money laundering, supplier due diligence, information security, confidentiality, business continuity, physical security, and security awareness should all be managed effectively.

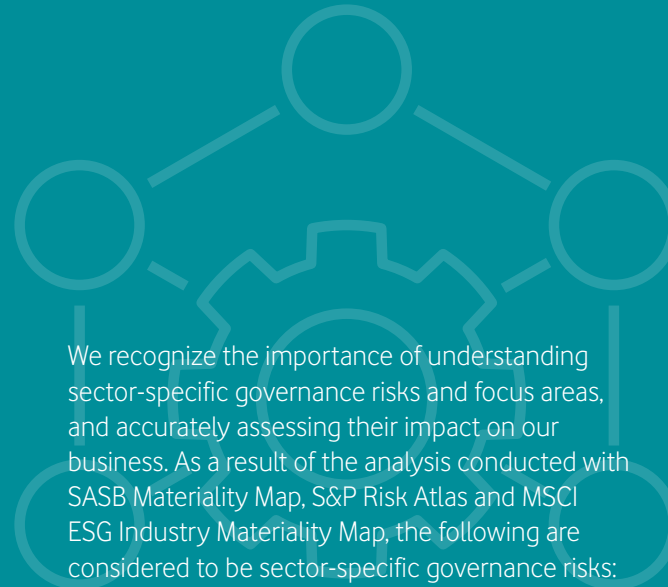
## Etki Faktörleri

**ESG Based Regulations**

**Ethical Business Practices**

**The Role of ESG in Corporate Governance**

**Transparent Governance**



- **Corporate Governance**
- **Customer Behavior Management**
- **Crisis Management**

## Assessment of International Initiatives in Terms of Governance Risk and Focus Area

	Sustainability Initiatives	Corporate Governance	Customer Behavior & Management	Crisis Management
SASB Materiality Map			✓	✓
S&P Risk Atlas			✓	
MSCI ESG Industry Materiality Map		✓		



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# Economic Impact

## Our Contribution to the Economy

**We are one of the largest direct foreign investors in Turkey.**

In line with our vision to lead digitalization in Turkey, Vodafone Turkey continues its growth in the last 16 years on its way to become a new generation connection and digital services company.

In FY21/22  
we invested

# 2.6 billion TL

Our total investments reached 28.6 billion TL since 2006, when we first started to operate in Turkey. We continued to contribute to the economic development of Turkey with taxes through our customers using our services (VAT, special communications tax etc.). Organic service income reached 17.2 billion TL by increasing 21.4 % compared to the previous year. EBIDTA reached 5.7 billion TL with a 23.8 % increase.

# 17.2

billion TL  
service revenues

# 5.7

billion TL  
EBIDTA

## Our Contribution to Local Development

While providing benefits to the society with our products and services, we also contribute to the economy. Local employment is an important part of the economic impact we create. Vodafone Turkey directly employs 2,959 employees and we support local economic development with our operations in different parts of Turkey.

## Our Contribution to Public Policies

Public policies in the regulated telecommunications sector must be developed in line with technological developments to ensure a healthy competitive environment. Vodafone accepts this responsibility, closely monitors global and national regulations, and regularly exchanges information with key stakeholders such as regulatory bodies, public institutions, non-governmental organizations, and the general public.

## Our Contribution to Local Technology System

We conduct R&D activities such as smart network systems, 5G technology and preparation for its localization, and support the local economy through local product purchases. In the last 6 years, the rate of our domestic product purchases has increased from 1.6% to 49.9%, and in FY21/22, our procurement of domestic certified products reached 648 million TL.



# Risk and Crisis Management

The risks must be addressed, identified, and managed in an integrated manner that includes economic, social, and environmental components. At Vodafone Turkey, we identify potential threats that may harm our brand and reputation and we develop solutions to eliminate such threats.

We prioritize providing uninterrupted communication in all circumstances. In this context, we diligently manage identification and prevention of misconduct, anti-corruption, anti-money laundering; supplier due diligence, information security, confidentiality, business continuity, physical security, and security awareness. In this context, we conduct business continuity management and emergency preparations. By receiving the international ISO 22320 Emergency Management Standard Certificate, we have documented our efforts to provide uninterrupted communication services under possible disaster conditions. By passing the international audit successfully, we became the first company receiving this certificate both in the Vodafone Group and the Turkish telecommunication sector. As a result, we have increased our capacity to cope with emergencies and to ensure business continuity by addressing the consequences of natural or man-made disasters at world standards.

## Data Protection

The development of a culture of remote working and increasing desire to access information, public services and education has led to a sharp increase in demand for connectivity. Thus, while the number of Internet users around the world has increased significantly, data security and privacy issues have gained more prominence.

As geopolitical, economic, and social inequalities grow, we need to develop inclusive and accessible digital solutions, and of course to guarantee data privacy and protection.

Millions of people, who trust Vodafone in protection of their personal data, are communicating over our networks. The monthly active customers using our digital channels reached 18.8 million in FY21/22. We are managing data privacy and security risks to sustain and reinforce this trust. We are protecting customer data with advanced systems. To ensure data security, we comply with ISO 27001 Information Security Management System Standard, Personal Data Protection Law and applicable regulations. We protect customers' personal data, mobile communications and credit card information in compliance with the International Information Security Management Standard ISO/IEC 27001 and PCI-DSS security standards as defined by the PCI Security Standards Council.

We are providing information on protection of personal data to the customers through our website, sales channels, and customer services in compliance with the Law on Protection of Personal Data. The customers use the same channels to give us feedback and make requests.

We do not only provide training to our employees on protection of personal data; we also add Data Processing Protocols (DPA) to the contracts of our suppliers and business partners to improve and audit their data security performance. We are categorizing suppliers based on the nature of their services, and audit them once a year to assess their information and technology security performance.





# Ethical Business Practices and Compliance

Fair, transparent, and accountable corporate governance underpins our responsible business practices. We carry out our activities with the goal of providing a safe environment and tools from our value chain to our employees and customers, and we back this up with effective corporate management. Strong corporate management allows us to implement our business strategy, and to be resilient and adapt immediately to changing conditions. Chairman and CEO roles are carried out by different individuals in line with the principle of separation of power. [Vodafone Turkey Board of Directors](#) is composed of five members; three of whom are women; while the Executive Board is composed of ten members, five of whom are women.

## Business Ethics and Human Rights

Doing the right thing means that we must always act with integrity to earn the trust of our customers, colleagues, business partners and the communities in which we operate. Guided by international principles on human rights, our business principles cover all parties working with Vodafone, including employees, contractors, subsidiaries, joint ventures and suppliers. We comply with all national and international laws and regulations and Vodafone Group's policies, and manage all our processes, including our relationships with our stakeholders in a fair, transparent and honest manner that respects human rights.

We respect the human rights of our employees in our operations, our suppliers in the entire value chain, our

business partners that we work together, and of the communities affected from our activities. The United Nations (UN) Human Rights Declaration, the UN Business World and Human Rights Guiding Principles, and the International Labor Organization Conventions guides us in this regard. We offer a work environment in line with ethical principles, human rights, OHS principles and environment protection standards to our employees. With Ethical Purchasing Rules, we guarantee that the conduct of activities is in line with these standards by all our suppliers and business partners.

## Anti-Bribery and Anti-Corruption

We do not tolerate corruption and bribery under any circumstances. We are the first technology and telecommunications company with ISO 37001 Certification for Anti-Bribery and Anti-Corruption Management Systems Standard, and we assess and take measures against corruption risks. We constantly monitor for potential corruption in the sales channel and the performance of the suppliers with our scoring system. This system helps us to prevent occurrence of any corruption incident and minimize potential damage. We are providing various anti-bribery and anti-corruption training to our employees through e-learning and virtual classes under the title of "Doing the Right Thing". We assess prospective suppliers and business partners under our anti-bribery and anti-corruption policy. In case of violations of ethical principles, anti-bribery and anti-corruption policies and human rights, internal and external stakeholders can report anonymously via the website and telephone.



Our ISO Certificates	
ISO 50001 Energy Management System	ISO 37001 Anti-Bribery and Anti-Corruption Management System
ISO 39001 Road Traffic Safety, Management, Systems	ISO 27001 Information Security Management System
ISO 22320 Emergency Management Systems	ISO 9001 Quality Management System

In the 2021/2022 fiscal year, we more than doubled the total amount of anti-bribery and anti-corruption training provided to our employees and raised it to 1,871 hours and increased the training per employee from 0.2 hours to 0.55 hours.



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We are not only focused on profit and job creation, but also on creating value for the environment and

society, and we extend a purpose-led procurement approach and transparency to all parts of our supply chain. The procurement processes of Vodafone Group companies are conducted by the Vodafone Procurement Company (VPC). Vodafone Turkey Supply Chain Management represents the VPC organization in Turkey.

The proportion of Vodafone's purchases that fall within the scope of domestic products increased from 1.6% to 49.9% in the last 6 years. We have

the highest amount of investment in the domestic goods in our industry, and we purchased 647 million TL worth of domestic certified products in the last 6 years. We expect our suppliers to meet the standards that we have defined in environmental, social and ethical areas in Vodafone Code of Conduct and Vodafone Ethical Purchasing Conduct. We are carrying out different activities to help our 524 suppliers to adopt these standards.

- In the fight against Modern Slavery, we take various actions as Vodafone

Group and publish the Modern Slavery Statement regularly every year. We provide online training to fight Modern Slavery.

- Our suppliers play an important role in our goal of positioning Turkey as an excellence center. Accordingly, we support the development of domestic products by our suppliers.
- We conduct the Vodafone Supplier Performance Program. We identify development areas of the suppliers and guide them to improve their performance.

## Supplier Day

We organize Supplier Day every year, welcoming more than 100 suppliers. We provide training in various subjects, including Ethics and Anti-Corruption Practices, Trade and Network Operations, OHS, and receive feedback from our suppliers.

## Supplier Forum

At the Vodafone Supplier Forum, which we organize with the participation of hundreds of suppliers across the country, we evaluate the previous year and talk about how we see the future and what we can do together.



# Supply Chain Management

## Purpose-led Procurement

We restructured the supply chain in Turkey in line with the purpose-led vision. In our ongoing efforts to create a digital society that supports socioeconomic development, embraces everyone and aims to preserve the world's resources by using technology, we have designed the supplier ecosystem to stand by us in our journey. While diversity, environment, occupational safety and health constitute 20% of our bid request evaluation criteria, occupational health and safety is considered as 10% and diversity, inclusion and environmental criteria are each considered as 5% in tenders.

Diversity, which forms a part of our way of doing business, is not limited only to our HR policies; we also want our entire ecosystem of business partners and suppliers to embrace diversity. Diversity is not an option in our selection criteria anymore, it is an indispensable part of our daily decision-making mechanisms. Thus, we want to join our forces with our suppliers in our purpose-led journey. Fundamentally, we include our purpose-led vision to our tender and bid evaluation processes. In the period ahead, our suppliers' performance and commitments on issues such as environment, inclusion and diversity, occupational safety, health and well-being will be more valuable to us than ever. In this direction, we aim that all these steps will strengthen our suppliers who want to expand globally.

## Plogging at the Belgrade Forest

We organized a plogging event to raise awareness on environmental and recycling issues across the supplier network. Approximately 100 people participated in the event organized in the Belgrade Forest in cooperation with Green Heroes Turkey on the Forest Week occasion. With the volunteer team, consisting of Vodafone employees, suppliers and their families, we both walked and collected waste on the 4-kilometer-long K  m  rc   Bendi track. A total of 110 kg of garbage was collected during the event, including 52 kg of glass, 30 kg of household waste and 28 kg of plastic. We sent the waste we collected to recycling, and plastic caps to the Spinal Cord Paralytics Association of Turkey.





# Mobile Devices, Base Stations and Public Health

## Mobile Devices and Base Stations

Base stations and mobile devices that we provide to our customers are installed, operated and supervised in compliance with the laws and regulations determined by the Information and Communication Technologies Authority (BTK). We take into account the reference values determined by an independent advisory institution, International Commission on Non-Ionizing Radiation Protection (ICNIRP<sup>5</sup>), respond transparently to social concerns over mobile devices and base stations, and comply with all the applicable legislation.

At Vodafone Group, we take great care of electric/electromagnetic field limit values, which are lower in Turkey than many other countries, and install and operate systems in full compliance. Mobile devices use radio waves to make calls, send and receive data from a base station, creating a kind of electric and electromagnetic field (EMF). Under our EMF policies, we do not allow the use of devices with a Specific Absorption Rate (SAR) value higher than the ICNIRP standard, which are not approved or do not offer information about SAR value in their manuals.

According to research, there is no evidence that mobile devices and base stations used within the international science-based guideline compliance limits of WHO and ICNIRP adversely affect human health. In order to eliminate concerns on mobile devices and base stations and ensure correct information flow:

- We publish the latest scientific studies on our website.
- We provide mandatory EMF training to our employees and suppliers.
- We apply a standard operating procedure in all networks in the scope of Vodafone's specific EMF Policy.
- We place warning signs about EMF at our sites.
- We install stations with the Security Certificate issued by the BTK.
- We carry out regular site visits to base stations.
- We do not allow access by unauthorized persons.

Investments we make in energy efficiency in our network and data centers to meet the growing data demand of our customers are available in the [Environment](#) section.

<sup>5</sup>4 ICNIRP works in cooperation with the World Health Organization (WHO), which is also used as a reference in the regulation issued by the Turkish regulatory authority.



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# Mobile Devices, Base Stations and Public Health

## Cyber Wellness and Online Safety

Cyber wellness refers to wellbeing and welfare of Internet users including understanding of online behaviors and how users can protect themselves online. In other words, it helps users to be more responsible digital learners and to manage their online relations more correctly and safely. Digital life may impact mental and physical health of individuals through concerns over information, safety, privacy and interpersonal interactions. For the cyber wellness of the society, users need to have the right knowledge, awareness and decision-making skills about the digital world.

Online safety means individuals protect themselves and others from online harms and risks that can jeopardize their personal information, lead to unsafe communications and even affect their mental health and well-being.

These risks can be listed as threats related to issues such as security, protection and management of personal data, reputation management, and avoidance of harmful and illegal content. Online security, also known as internet security, e-security and cyber security, covers all technological devices that have access to the internet, from desktop and laptop computers to smartphones and tablets.

Safe Internet Service, which is among Vodafone Online Transactions, is a security service that consists of two options, Child Profile and Family Profile and aims to protect users from harmful content on the Internet. To benefit from the Secure Internet Service, the service can be activated by contacting the dealer, call center, short message service (SMS) or online transaction center of the operator providing internet access and profiles can be changed or disabled at any time. Detailed information is available at [www.guvenlinet.org](http://www.guvenlinet.org).



# Annexes

## Environmental Performance Indicators

<b>Energy Consumption (MWh)</b>	<b>2019/20</b>	<b>2020/21</b>	<b>2021/22</b>
<b>Buildings - Fuel</b>	<b>6.789</b>	<b>4.514</b>	<b>5.916</b>
Base Stations	4.339	3.716	4.729
Technology Centers	535	227	238
Offices	1.914	571	950
<b>Vehicle Fuels</b>	<b>14.297</b>	<b>9.220</b>	<b>11.745</b>
<b>Electricity Consumption</b>	<b>515.478</b>	<b>535.525</b>	<b>576.976</b>
Non-Renewable Resources	515.036	534.823	-
Renewable Resources	-	-	575.930
Electricity Generated from Renewable Sources at Vodafone Facilities	442	703	1.047
<b>Total Energy Consumption</b>	<b>536.564</b>	<b>549.260</b>	<b>594.638</b>

<b>GHG Emissions (ton CO<sub>2</sub>e)</b>			
<b>Scope 1</b>	<b>14.003</b>	<b>11.024*</b>	<b>12.723</b>
Fuels	4.441	3.373	4.304
Vehicles	3.487	2.207	2.755
F-gases	6.075	5.444*	5.664
<b>Scope 2</b>	<b>244.179</b>	<b>228.316</b>	<b>-</b>
Base Stations	204.076	193.146	-
Technology Centers	33.602	31.787	-
Offices	6.501	3.382	-
<b>Scope 1+2</b>	<b>258.181</b>	<b>239.340</b>	<b>12.723</b>
<b>Scope 3</b>	<b>4.115</b>	<b>1.269</b>	<b>51.883**</b>
<b>Total</b>	<b>262.296</b>	<b>240.609</b>	<b>64.606</b>

<b>Water Withdrawal (m<sup>3</sup>)</b>			
Municipal water	41.960	11.223	11.070

<b>E-waste (kg)</b>			
Recovered and recycled	1.291.447	1.384.535	3.227.128
Reused	117.097	43.681	33.484
Sent to Landfill	1.385	3.890	1.540
<b>Total</b>	<b>1.409.929</b>	<b>1.432.106</b>	<b>3.262.152</b>

\*As a result of internal audit findings, adjustments were made in the amount of emission from refrigerating gases for the FY2020/21. Total scope 1 emissions for FY20/201 have been adjusted accordingly.

\*\*We expanded the scope of our Scope 3 emissions in the FY2021/22 to cover employee shuttle vehicles, flights and train travels, and downstream transportation and office waste



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# Social Performance Indicators

	2019/20		2020/21		2021/22	
	Female	Male	Female	Male	Female	Male
<b>Employees by Gender</b>						
Number of employees	1.286	1.730	1.346	1.727	1.294	1.665
Total	3.016		3.073		2.959	
<b>Employees by Term of Employment</b>						
0-5 Years	681	817	670	725	758	811
5-10 Years	291	437	282	395	221	344
10+ Years	314	476	394	607	315	510
<b>Number of New Recruits</b>						
Below 30 years old	116	124	99	87	130	97
31-49 years old	61	99	63	87	84	112
50+ years old	0	1	1	0	1	0
Total number of employees recruited during the year	177	224	163	174	215	209
<b>Employee Turnover</b>						
Below 30 years old	94	87	31	53	109	93
31-49 years old	159	235	81	134	190	210
50+ years old	0	9	2	3	4	7
Total number of employees who left within the year	253	331	114	190	303	310
<b>Performance Review</b>						
Number of employees subject to performance review	1.281	1.723	1.346	1.727	1.294	1.665
<b>Number of Employees at Senior Management by Gender and Age</b>						
Below 30 years old	0	0	0	0	1	0
31-49 years old	62	99	59	92	70	89
50+ years old	1	8	5	9	6	14
<b>Parental Leave</b>						
Number of male employees on parental leave	40	90	55	38	55	69
Number of employees returned from parental leave	40	89	53	37	48	70
<b>Employee Training</b>						
Total training hours	105.677		74.209		89.253	
OHS training	6.470		988		49.385	
<b>Occupational Health and Safety</b>						
Number of accidents	2		3		5	
Number of accidents involving death	0		1		0	
Number of occupational diseases	0		0		0	
<b>Occupational Health and Safety - Contractors</b>						
Number of contractor OHS violations	156		99		73	
Number of contractors evaluated regarding OHS	56		27		33	
Number of site audits at base stations	1.407		1.442		1.223	



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# Stakeholder Engagement

We attach importance to having regular communication with our stakeholders and value their priorities and expectations. We categorize different stakeholder groups according to their impact on Vodafone Turkey and use the most appropriate communication method. You can access the actions we have taken and the activities we have accomplished according to the priorities of our stakeholders under the relevant headings in our report.

Sphere of Influence	Stakeholders	Communication Method	Communication Frequency	Priorities and Expectations of the Stakeholders
Direct Impact	Employees	Sustainability Report, Red Loves Green Internal Communication Channel, Digital Office Screen, Orientation Program	Periodical/Daily	Talent Management, Diversity and Inclusiveness, Occupational Health and Safety and Employee Wellbeing, Economic Impact
	Customers	Call Centers, Sales Channels and Dealers, Sustainability Report, Vodafone Media Center, Vodafone Turkey Social Media Accounts, My VF App	Periodical/Daily	Technological Innovation, Being a Digital Solution Partner, Accessibility, Digital Rights and Freedoms, Data Protection
	Suppliers	Sustainability Report, Supplier Performance Management, Vodafone Media Center, Supplier Day	Periodical/Daily	Technological Innovation, Supply Chain Management, Occupational Health, Safety and Employee Wellbeing, Economic Impact
Indirect Impact	Public Institutions and Regulatory Authorities	Information Reports, Sustainability Report, consultation meetings and interviews	At Least Once a Week	Technological Innovation, Ethical Business Practices and Compliance, Management of Risk and Crisis, Mobile Devices, Base Stations and Public Health, Data Protection
	Business Partners and Initiatives	Dealer Portal, V-Star App, Sustainability Report, Vodafone Media Center	At Least Once a Week	Technological Innovation, Supply Chain Management, Economic Impact
	Non-Governmental and International Organizations	Sustainability Report, Vodafone Media Center, Stakeholder Engagements, E-Mails, Sponsorships, Conferences	At least once a month	Technological Innovation, Ethical Business Practices and Compliance, Mobile Devices, Base Stations and Public Health, Accessibility, E-waste and Circular Economy, Equal Opportunities in the Digital World, Climate Change and Energy
	Media	Website, Sustainability Report, Vodafone Media Center, Vodafone Turkey Social Media Accounts	At Least Once a Week	Driving Sectorial Development, Evaluation of Current Issues, Transparency
	Universities	Sustainability Report, Stakeholder Engagement E-Mails, Conferences, University Career Days	At least once a month	Technological Innovation, Mobile Devices, Base Stations and Public Health, Accessibility, E-Waste and Circular Economy, Equal Opportunities in the Digital World, Climate Change and Energy
	Those Bringing New Opportunities, Knowledge and Insight	Think Tanks	Periodical	Digital Rights and Freedoms, Climate Change and Energy, Technological Innovation, Accessibility





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# Projects and Sustainable Development Goals Map

Material Issue	Project Title	SDG	Objective	Vodafone Turkey Focus Area	Vodafone Group Purpose Pillar
Climate Change	Transition to Hybrid Vehicles				
	Business Travels Ready for the Future				
	Artificial Intelligence in the Air-Conditioning Infrastructure of the Data Center				
	Variable Frequency Driver Application				
	Esenyurt and Adana Technology Center Solar Power System				
E-waste and Circular Economy	Green Offices				
	New Generation Environment-Friendly Stores				
	Reuse, Resell, Recycle				
	Renewed Second-Hand Device Campaign				
	Waste to Code				
	Green Planet				
Environmental Benefits from Products and Services	Supporting Our Clients to Reduce Their Carbon Emissions				
	Eco Rating				
	Eco SIM-Card				







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# Projects and Sustainable Development Goals Map

Material Issue	Project Title	SDG	Objective	Vodafone Turkey Focus Area	Vodafone Group Purpose Pillar
Being a Digital Solution Partner	Digital Agriculture Solution				
	Digital Society - V-hub				
	Red Energy				
Technological Innovation	My Vodafone				
	Vodafone Pay and Mobile Payment and Her Şey Yanımda Mobile Payment Feature				
	Vodafone TOBI				
	Vodafone Electronic Agreement (VES) Platform				
Equal Opportunities in the Digital World	Connected Women				
	Easy Rescue Application				
	#BenVarım				
	Coding Tomorrow				
	Young Talents Program				
Investing in Society	Vodafone Turkey Foundation				
Diversity and Inclusion	Global Parental Leave Policy				
	Supporting Employment of Women in Technology				
	Equalmeter				





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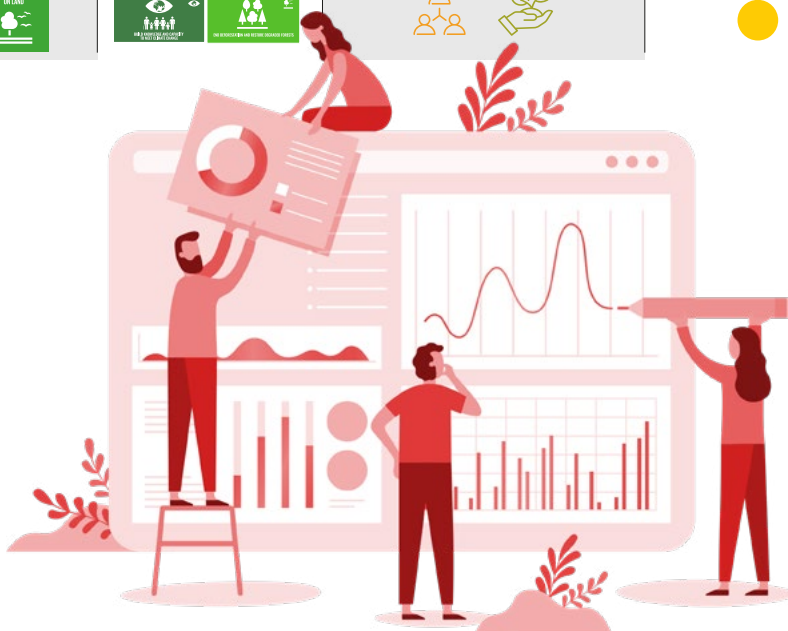
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# Projects and Sustainable Development Goals Map

Material Issue	Project Title	SDG	Objective	Vodafone Turkey Focus Area	Vodafone Group Purpose Pillar
Talent Management	Red Academy				
	Coaching Programs				
	ReConnect				
	International Development Program				
Occupational Health, Safety and Employee Wellbeing	Wellbeing Program				
Supply Chain Management	Purpose-led Procurement				
	Plogging in the Belgrade Forest				



# Memberships and Collaborations

## Enviroment



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# UNGC Progress Report

Area	Principles	Respective Section of the Report
Human Rights	Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.	Ethical Business Practices and Compliance
	Principle 2: Businesses should make sure that they are not complicit in human rights abuses.	Ethical Business Practices and Compliance
Work Standards	Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.	Acting with dedication for a diverse and inclusive workforce
	Principle 4: Businesses should uphold the elimination of all forms of forced and compulsory labor.	Ethical Business Practices and Compliance Supply Chain Management
	Principle 5: Businesses should uphold the effective abolition of child labor.	Supply Chain Management
	Principle 6: Businesses should uphold the elimination of discrimination in respect of employment and occupation.	Acting with Dedication for a Diverse and Inclusive Workforce
Environment	Principle 7: Businesses should support a precautionary approach to environmental challenges.	Environment
	Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility.	Environment
	Principle 9: Businesses should encourage the development and diffusion of environmentally friendly technologies.	Environment
Anti-corruption	Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.	Ethical Business Practices and Compliance



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# UN Women's Empowerment Principles

Principles	Respective Section
<b>Principle 1:</b> Establish high-level corporate leadership for gender equality	Diversity and Inclusion
<b>Principle 2:</b> Treat all women and men fairly at work - respect and support human rights and nondiscrimination; promote these principles	Diversity and Inclusion
<b>Principle 3:</b> Ensure the health, safety, and well-being of all female and male employees	Diversity and Inclusion Occupational Health, Safety and Employee Wellbeing
<b>Principle 4:</b> Promote education, training, and professional development for women	Talent Management
<b>Principle 5:</b> Implement enterprise development, supply chain, and marketing practices that empower women	Diversity and Inclusion Equal Opportunities in the Digital World
<b>Principle 6:</b> Promote equality through community initiatives and advocacy	Diversity and Inclusion Equal Opportunities in the Digital World
<b>Principle 7:</b> Measure and publicly report on progress to achieve gender equality	Diversity and Inclusion

# GRI Content Index

GRI Standard	Indicators	References
<b>GRI 101: Foundation 2016</b>		
<b>Organisational Profile</b>		
	102-1	4
	102-2	4
	102-3	Vodafone Plaza, Büyükdere Cad. No: 251, Maslak 34398, İstanbul
	102-4	4
	102-5	All shares of Vodafone Turkey Group of Companies are owned by Vodafone Group Plc
	102-6	4, 6, 51
	102-7	6, 7, 51
	102-8	42, 58
	102-9	54, 55
	102-10	During 2021/22 fiscal year, there were no significant changes regarding size, structure, ownership or supply chain in Vodafone Turkey.
	102-11	52
	102-12	64
	102-13	64
<b>Strategy</b>		
	102-14	3
	102-15	19, 32, 50, 52
<b>Ethics and Integrity</b>		
	102-16	6, 53
	102-17	53
<b>Governance</b>		
	102-18	17
	102-19	17
	102-20	17
<b>Stakeholder Engagement</b>		
	102-40	60
	102-41	Although Vodafone Turkey employees are not unionised, we respect the right of collective bargaining.
	102-42	15, 60
	102-43	15
	102-44	15, 60
<b>Reporting Practice</b>		
	102-45	4
	102-46	4
	102-47	12, 14
	102-48	There were no restatements.
	102-49	4
	102-50	4
	102-51	April 1, 2021 – March 31, 2022
	102-52	Sustainability Report is published annually.
	102-53	4
	102-54	4
	102-55	67, 68
	102-56	No assurance obtained.

GRI 102:  
General  
Disclosure  
2016

GRI Standard	Indicators	References
<b>GRI 200: Economic Standard Series 2016</b>		
<b>Economic Performance</b>		
GRI 103: Management Approach 2016	103-1	51
	103-2	51
	103-3	51
GRI 201: Economic Performance 2016	201-1	51
<b>Indirect Economic Impact</b>		
GRI 103: Management Approach 2016	103-1	51
	103-2	51
	103-3	51
GRI 203: Indirect Economic Impact 2016	203-1	51, 33-40
	203-2	51, 33-40
<b>Procurement Practices</b>		
GRI 103: Management Approach 2016	103-1	54, 55
	103-2	54, 55
	103-3	54, 55
GRI 204: Procurement Practices 2016	204-1	54, 55
<b>Anti-Corruption</b>		
GRI 103: Management Approach 2016	103-1	53
	103-2	53
	103-3	53
GRI 205: Anti-Corruption 2016	205-1	53
	205-2	53
<b>GRI 300: Environmental Standard Series 2016</b>		
<b>Energy</b>		
GRI 103: Management Approach 2016	103-1	20, 22, 24
	103-2	20, 22, 24
	103-3	20, 22, 24
GRI 302: Energy 2016	302-1	21, 22, 23, 58
	302-2	21, 22, 23, 58
	302-3	23
	302-4	21, 22, 23, 24
<b>Water</b>		
GRI 303: Water 2016	303-1	58

GRI Standard	Indicators	References
<b>GRI 300: Çevresel Standart Serileri 2016</b>		
<b>Effluents</b>		
GRI 103: Management Approach 2016	103-1	25
	103-2	25
	103-3	25
GRI 306: Effluents 2016	306-1	58
<b>Environmental Compliance</b>		
GRI 103: Management Approach 2016	103-1	16, 20
	103-2	16, 20
	103-3	16, 20
GRI 307: Environmental Compliance 2016	307-1	20
<b>Supplier Environmental Assessment</b>		
GRI 103: Management Approach 2016	103-1	54
	103-2	54
	103-3	54
GRI 308: Supplier Environmental Assessment 2016	308-1	55
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<b>Occupational Health and Safety</b>		
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<b>Diversity and Equal Opportunity</b>		
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<b>Non-discrimination</b>		
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