

AGESA HAYAT VE EMEKLİLİK A.Ş.
2025 CLIMATE-RELATED DISCLOSURES



Table of Contents

About This Report	3
Connection with Financial Disclosures	4
Subsidiaries	4
Limited Assurance.....	4
Transition Reliefs.....	5
About AgeSA	5
Governance	8
Governance Bodies	9
Competencies and Capacity Building.....	13
Strategy	15
Transition Plan	23
AgeSA Climate Resilience Assessment.....	33
Risk Management	34
Risk Management Framework	34
Climate-Related Metrics	40
Climate-Related Targets	42
Appendix.....	44

About This Report

The climate-related consolidated disclosures presented in this report have been prepared for AgeSA Hayat ve Emeklilik A.Ş. ("AgeSA" or the "Company") and its subsidiaries and are presented in accordance with the Turkish Sustainability Reporting Standards (TSRS) issued by the Public Oversight, Accounting and Auditing Standards Authority (POA), which are effective for annual reporting periods beginning on or after January 1, 2024.

The report includes disclosures expected to be reported under four core pillars defined by the POA framework: Governance, Strategy, Risk Management, and Metrics and Targets.

TSRS refers to two sustainability reporting standards published by the POA, together with sector-specific implementation guidance:

TSRS 1: General Requirements for Disclosure of Sustainability-related Financial Information

TSRS 2: Climate-related Disclosures

Guidance on the Industry-based Application of TSRS 2: Volume 17 - Insurance

In preparing this report, AgeSA has considered the requirements of TSRS 1 General Requirements for Disclosure of Sustainability-related Financial Information, TSRS 2 Climate-related Disclosures, and the Guidance on the Industry-based Application of TSRS 2. Accordingly, the report provides information on climate-related risks and opportunities that could reasonably be expected to affect AgeSA's cash flows, access to finance, and cost of capital over the short, medium, and long-term, with the objective of supporting the decision-making processes of users of general-purpose financial reports.

These risks and opportunities are disclosed in the Strategy and Risk Management sections of this report in line with the materiality assessments conducted by the Company.

AgeSA adopts a proportionate approach based on its available skills, capabilities, and resources and incorporates all reasonable and supportable quantitative information available during the reporting period into this report.

This report has been approved by the Board of Directors of AgeSA. The financial and non-financial information presented herein has been prepared in accordance with the conceptual framework set out in TSRS and is designed to be fair, verifiable, timely, and understandable.

Connection with Financial Disclosures

The climate-related disclosures included in this report cover AgeSA and its subsidiaries and relate to the reporting period from January 1, 2025 to December 31, 2025.

The disclosures have been prepared using data, assumptions, and methodologies consistent with AgeSA's consolidated financial statements as of December 31, 2025, and the reporting currency used throughout the report is the Turkish lira (TRY).

Subsidiaries

Subsidiary	Ownership Interest (%) as of December 31, 2025
AgeSA Sigorta Aracılığı A.Ş.	100.00
Medisa Sigorta A.Ş.	100.00

Limited Assurance

As part of the mandatory sustainability assurance engagement conducted in accordance with the Turkish Sustainability Reporting Standards published by the Public Oversight, Accounting and Auditing Standards Authority (POA) in the Official Gazette dated December 29, 2023 and numbered 32414 (M), this report has been subject to a limited assurance engagement by DRT Bağımsız Denetim ve Serbest Muhasebeci Mali Müşavirlik A.Ş. (Deloitte Türkiye) in accordance with ISAE/GDS 3000 "Assurance Engagements Other Than Audits or Reviews of Historical Financial Information" and ISAE/GDS 3410 "Assurance Engagements on Greenhouse Gas Statements." The Limited Independent Assurance Statement is presented in the Appendices section of this report.

Transition Reliefs

AgeSA has elected to apply the following transition reliefs:

Scope 3 greenhouse gas emissions have not been disclosed in the current reporting period under the exemption available during the first two years of reporting.

During the reporting period, disclosures focused solely on climate-related risks and opportunities.

About AgeSA

AgeSA Hayat ve Emeklilik A.Ş. is a publicly listed company incorporated in Türkiye, with 20% of its shares traded on Borsa İstanbul (BIST). Established in 2007 as AvivaSA Emeklilik ve Hayat, the Company adopted the name AgeSA Hayat ve Emeklilik on July 1, 2021, following the decision of Sabancı Holding and Ageas, the Belgium-based insurance group with nearly two centuries of history, to continue their partnership under the principle of equal shareholding as of May 5, 2021. As of December 31, 2025, AgeSA's shareholder structure comprises Ageas Insurance International NV (40%), H.Ö. Sabancı Holding A.Ş. (40%), and publicly held shares (20%).

AgeSA provides innovative individual pension, life insurance, and personal accident insurance solutions to nearly four million customers. In addition to its direct sales force, the Company serves customers through a unique multi-channel distribution model consisting of a strong bancassurance network established through its collaboration with Akbank, agencies, the Tele-Sales Channel, and its corporate projects team.

With 2,122 employees as of year-end 2025, AgeSA held an 18.6% market share in the Turkish private pension market, including Auto-Enrolment, with TRY 402 billion in assets under management, according to data published by the Pension Monitoring Center (EGM) as of December 31, 2025. Based on assets under management, the Company maintained its position as the leading private-sector pension provider in Türkiye. According to data published by the Insurance Association of Türkiye (TSB) and HAYMER, AgeSA generated TRY

24 billion in total life and personal accident premiums in 2025, achieving a 13.4% market share in the direct premium production market among pension and/or life insurance companies.

In 2024, in line with its vision of addressing individuals' insurance needs through a holistic approach, AgeSA invested in the healthcare ecosystem by acquiring 100% of the shares representing the share capital of Medisa Sigorta A.Ş. Through its strong strategic ambitions, Medisa aims to deliver innovative and integrated solutions by combining health insurance products with digital healthcare applications and wellness programmes.

Under the Medisa umbrella, the Company seeks to offer a comprehensive and seamless healthcare experience through health insurance products, including Private Health Insurance (PHI) and Complementary Health Insurance (CHI), as well as digital health and telehealth services. This integrated approach supports AgeSA's ambition to enhance access to healthcare services while promoting preventive care and healthier lifestyles.

Value Chain Overview

When preparing its climate-related financial disclosures, AgeSA considered not only its own operations but also its entire value chain, including its subsidiaries. The reporting scope includes the direct operations of AgeSA and its subsidiaries, as well as upstream and downstream value chain activities.

Upstream Value Chain	Direct Operations	Downstream Value Chain
Service Providers	Services and Corporate Governance	Brand Management and Corporate Communications
Digital Platform and Software Providers	Senior Management and Decision-Making Bodies	Digital Marketing Campaigns
Audit and Legal Services	Customer Relationship Management (CRM)	Media and Press
Cybersecurity Services	Product Development Department	Sponsorships

Cloud-Based Server and Data Storage Providers	Employees	NGOs
Consultancy Services (HR, financial, and operational processes)	Sales Channels and Agencies (digital & physical)	Universities and Academics
Regulatory Bodies	Claims Management	Investment Portfolio
Regulatory Authorities (SEDDK, TSB, etc.)	Industry Legislation	Loss Adjusters
Contracted Service and Provider Networks	Claims Assessment and Payment Processes	Investment Strategy and Portfolio Management
Energy and Infrastructure	Financial Management	Investor Relations
Electricity and Natural Gas Suppliers	Insurance Profit/Loss Models	Investor Presentations and Reporting
Reinsurance and Advisory Services	Risk Assessment Systems	CMB and Other Regulatory Filings
Reinsurance Brokerage and Advisory Services	Tax, Accounting, and Compliance Functions	Public Disclosure Platform (KAP) Announcements
Sources of Finance	Subsidiaries	Customer Relations
Financial Instruments	AgeSA Sigorta Aracılığı A.Ş.	Customer Channels (Mobile Application, Web, Branch, Call Center)
Internal Investment and Capital Allocation Mechanisms	Medisa Sigorta A.Ş.	Customer Surveys and Feedback Systems

Governance

Sustainability- and climate change-related risks are integrated into the existing risk management framework and are addressed as strategic and business risks as well as operational risks. AgeSA evaluates the impacts of its sustainability- and climate change-related risks in conjunction with environmental, social and governance (ESG) considerations, taking into account developments that may arise in the short, medium and long-term, as well as their regulatory compliance, reputational, customer and financial dimensions.

At AgeSA, responsibilities related to the monitoring, management and oversight of sustainability- and climate change-related risks and opportunities are carried out under the coordination of the Audit Committee, the Early Detection of Risk Committee and the Sustainability Committee. Oversight of these responsibilities is provided by the Board of Directors, which holds ultimate accountability.

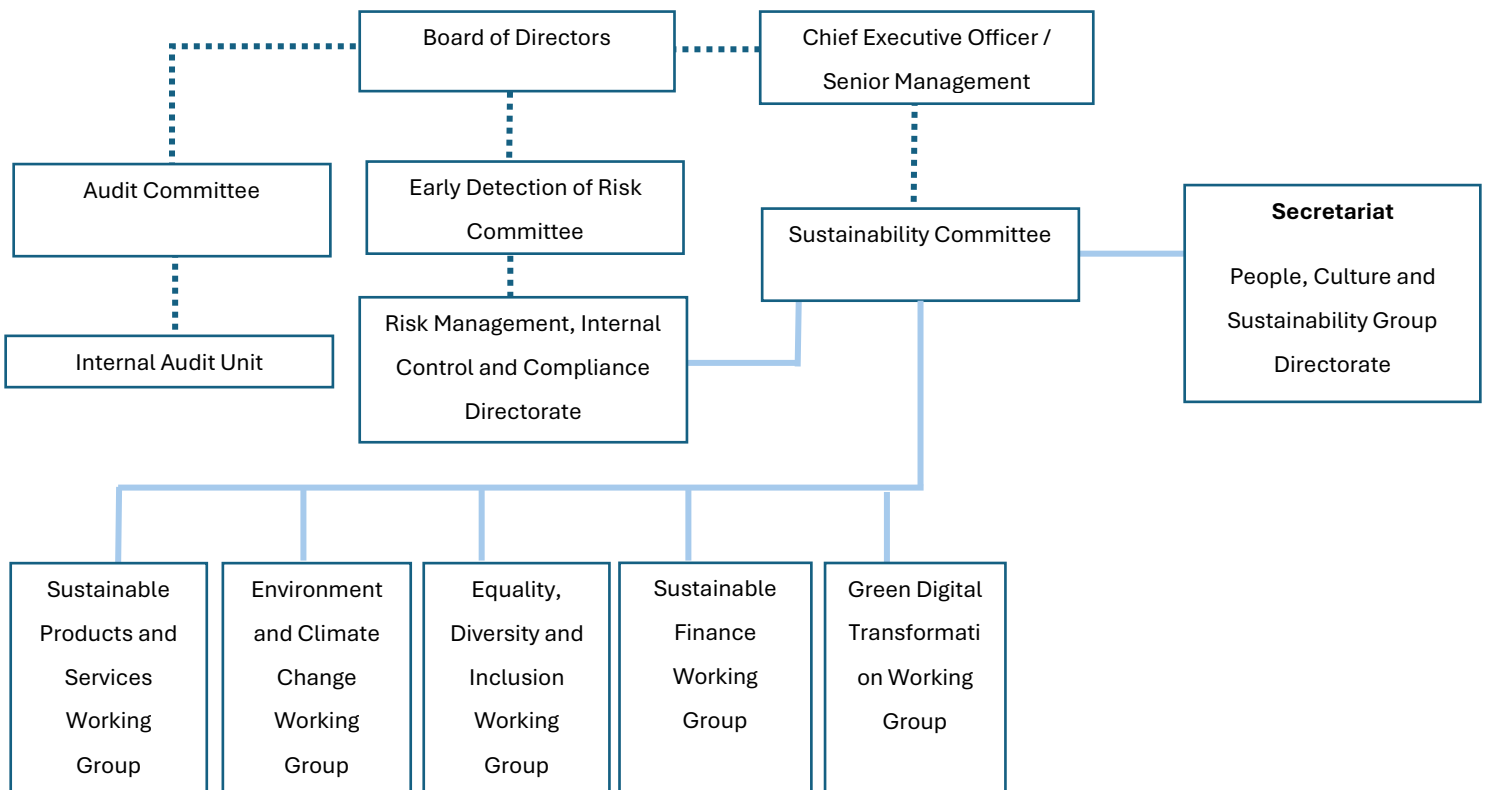


Figure 1 – AgeSA Sustainability Governance



Governance Bodies

Board of Directors

AgeSA's Board of Directors holds ultimate responsibility for sustainability management. The Board of Directors is responsible for evaluating and managing risks associated with the Company's activities by defining the level of risk the Company is willing to assume (risk appetite) and establishing an appropriate governance framework accordingly, determining the Company's overall risk management approach as well as the policies, strategies and implementation principles for each risk category, ensuring the establishment of an effective control framework, and overseeing its operation.

To support the oversight of sustainability-related risks and opportunities, the Board of Directors is guided by the Risk Management Framework Policy together with the Sustainability Policy. The Board of Directors is directly responsible for approving any structural amendments to these policies. It is also directly informed about the sustainability impacts considered during decision-making processes related to major transactions and strategic investments, as well as the outcomes of such assessments. In line with these responsibilities, the Board of Directors provides guidance on the sustainability vision, sustainability strategy and strategic decisions.

Audit Committee

The Audit Committee consists of two independent members of the Board of Directors. Within the organizational structure, the Internal Audit Department operates as a department that reports directly to the Board of Directors and is organized with administrative independence.

AgeSA aims, through its internal control system, to manage risk factors that may hinder the achievement of its strategic and operational objectives, including sustainability- and climate change-related risks and opportunities, within established risk limits. The activities of the risk management and internal audit functions are intended to support operational efficiency and effectiveness; ensure the timely, accurate and reliable production of financial

and managerial information; maintain compliance with applicable legal and regulatory requirements; safeguard shareholders' investments and the Company's assets; and facilitate the effective and efficient management of risks.

The scope of internal audit activities includes the review and evaluation of the effectiveness and adequacy of internal control, risk management and administrative processes. Based on these assessments, reliable, independent and objective opinions, together with recommendations for improvement and enhancement, are provided regarding these processes.

The Audit Committee convened four times in 2025.

Internal Audit Function

It is responsible for overseeing the strategies, policies and targets established in relation to sustainability- and climate change-related risks and opportunities. This structure ensures the holistic monitoring of progress towards sustainability objectives, reporting processes, and risk management practices.

Early Detection of Risk Committee

The Early Detection of Risk Committee monitors strategic, financial, insurance, compliance, operational, sustainability- and climate change-related risks that may endanger the Company's existence, development and continuity; evaluates processes related to the management of these risks; and regularly reports its assessments to the Board of Directors.

The Committee provides recommendations and advice to the Board of Directors regarding the timely identification and definition of such risks; the assessment and prioritization of their impacts and likelihoods; their monitoring and review; the evaluation of the effectiveness of the risk management framework; and the management, reporting and consideration of identified risks and opportunities in decision-making processes in line with the Company's risk profile and risk appetite. In addition, the establishment of risk management and internal control systems and ensuring their integration into the Company's corporate structure are among the Committee's responsibilities.

The Committee convened six times in 2025 to discuss these matters.

Sustainability risks are addressed within AgeSA's corporate risk framework under strategic and operational risks, and inherent and residual risk assessments are conducted. Depending on the priority level of the risk, climate-related risks assessed within the category of risks exceeding tolerance levels are included in the agenda of the Early Detection of Risk Committee.

The Early Detection of Risk Committee monitors significant risks to which the Company may be exposed, including sustainability-related risks, and informs the Board of Directors regarding such risks when the residual risk level exceeds the defined tolerance threshold. Comprehensive reports covering key risk areas, stress scenarios, scenario analyses, and compliance with established risk limits and risk appetite thresholds are submitted to the Board of Directors by the Early Detection of Risk Committee.

The Committee is chaired by an independent member of the Board of Directors.

Risk Management, Internal Control and Compliance Directorate

The Risk Management, Internal Control and Compliance Directorate is responsible for establishing and implementing the policies, procedures and tools required for the identification, assessment, management and reporting of risks, as well as monitoring the effectiveness of these processes. It also ensures the regular analysis and reporting of risk data to senior management and relevant committees, maintains the sustainable operation of internal control systems, and oversees the implementation of the AgeSA Risk Management Framework.

Climate-related risks that fall outside risk tolerance levels and are classified as high risks are escalated by the Risk Management, Internal Control and Compliance Directorate to the Early Detection of Risk Committee.

Sustainability Committee

The body responsible for determining AgeSA's sustainability strategy, policies and targets across environmental, social and governance (ESG) matters is the Sustainability Committee, which consists of the Chief Executive Officer, Executive Vice President of Finance, Executive Vice President of Direct Sales and Agencies, Executive Vice President of Bancassurance, Executive Vice President of Corporate Sales, Executive Vice President of Operations, Executive Vice President of Marketing and Strategy, Executive Vice President of Business Technologies, Executive Vice President of People, Culture and Sustainability, Director of Risk Management, Internal Control and Compliance, and Group Manager of People, Culture and Sustainability.

The roles, responsibilities and scope of authority of the Sustainability Committee are set out in the Sustainability Committee Roles and Responsibilities Policy.

The strategy established in line with the Company's sustainability objectives is designed to cover both upstream and downstream value chains and is subject to regular oversight by the Board of Directors. The Committee meets at least once a year to monitor and assess the impacts of sustainability-related risks and opportunities on the business model and value chain.

Where climate change- and sustainability-related risks require consideration at the management level, such risks are reported to the Committee by the People, Culture and Sustainability Group Management and the relevant business unit. Priority findings and decisions arising from Committee meetings are reported to the Board of Directors through the Chief Executive Officer, thereby ensuring that the Board of Directors has regular and up-to-date access to information on sustainability matters.

The Committee convened once during 2025, and the relevant information was reported once to the Board of Directors through the Chief Executive Officer.

People, Culture and Sustainability Group Management

The People, Culture and Sustainability Group Management and its affiliated working groups assume responsibilities for the management of risks and opportunities to support the implementation of AgeSA's sustainability- and climate change-related targets and strategies.

The process of identifying and assessing sustainability- and climate change-related risks and opportunities is carried out jointly by the relevant business units and the People, Culture and Sustainability Group Management. Where identified risks require action at the management level, such risks are escalated to the Sustainability Committee agenda. The Committee evaluates these risks within the framework of the Company's strategic objectives and sustainability policies and provides the necessary guidance. In addition, recent developments, regulations and trends related to climate change are regularly communicated to the Committee.

This structure, which enables a bottom-up flow of information, supports a multi-layered, systematic and collaborative process for reporting and decision-making on climate change-related risks and opportunities across operational, management and strategic levels.

Competencies and Capacity Building

The Sustainability Committee consists of members with diverse experience and capabilities. Committee members possess expertise across key business functions, including strategy, finance, risk management, people, culture, sustainability, operations and product development.

The members of the Sustainability Committee and their respective titles are presented in the table below.

Where necessary, teams with decision-making responsibilities on ESG matters or subject matter experts from various departments contribute to the Committee's work. To enhance the knowledge and competencies of teams involved in the implementation of sustainability-related strategies at AgeSA, various training and awareness-building initiatives are

conducted. These activities are generally delivered in a structured manner through coordination meetings with relevant business units, thereby ensuring a regular and systematic flow of information regarding sustainability strategies, current developments and implementation processes.

Within this scope, awareness, update and results presentations regarding TSRS were delivered to the relevant project team. This project team consists of representatives from the finance, product development, risk management, investor relations and fund management functions.

In addition, sustainability training is provided to all newly hired employees as part of the onboarding programme. Within this scope, a total of 108 hours of training was delivered to 12 newly hired employees.

These activities support the strengthening of institutional capacity on sustainability matters and facilitate the monitoring of current developments.

Performance Monitoring and Tracking of Progress

AgeSA's short-, medium- and long-term strategic targets related to sustainability and climate change risks and opportunities are integrated into the performance evaluation processes of the teams responsible for implementing, managing and monitoring related projects. In addition to the targets determined internally by AgeSA, there are also sustainability key performance indicators (KPIs) designated by Sabancı Holding and included in the Company Performance Scorecard. The year-end achievement levels of the sustainability KPIs included in the Company Performance Scorecard are closely monitored, reported and assessed based on objective criteria. In 2025, we achieved 200% of the targets included in our sustainability and climate change-related KPI set and incorporated into the senior management target scorecard.

Our sustainability and climate change-related KPI set for 2025 is presented below:

- Completion of internal TSRS trainings and establishment of the project team
- Completion and publication of the TSRS Report

- Development of the Nature-Related Targets Framework

These indicators form the basis of the analysis process conducted by Sabancı Holding regarding ESG matters. The Sustainability Committee determines and monitors annual performance indicators related to these targets in collaboration with the Sabancı Holding Sustainability Directorate. The results of these assessments are considered at the Board of Directors level, and the degree of achievement of climate-related risk and opportunity targets has a direct impact on the determination of senior management performance bonuses. Within the performance evaluation processes conducted at both Board of Directors and senior management levels, sustainability-related risks and opportunities, associated targets and progress against these targets are reviewed regularly. In this context, in addition to financial results, the alignment of long-term sustainable improvement targets with ESG policies is also taken into consideration.

Strategy

Climate-Related Risk Disclosures

AgeSA identifies sustainability- and climate change-related risks and opportunities that are reasonably expected to affect its future financial and non-financial position through its Risk and Opportunity Inventory, established in 2024. In developing the Inventory, AgeSA takes into consideration global developments related to climate change, national and international regulatory requirements, as well as the business and future strategies of its shareholders, Sabancı Holding and Ageas. Climate change-related risks classified under Operational Risks and Strategic and Business Risks are reviewed and assessed annually in line with the Company's risk management framework. Accordingly, an assessment was conducted in 2025, and no changes were identified in the residual risk impact and likelihood assessments compared to the previous year.

Sustainability-related risks included in the Risk and Opportunity Inventory are assessed under three categories: Environmental, Social, and Governance. Climate change-related

risks are identified and evaluated in alignment with the transition and physical risk categories defined under the TSRS Standards.

AgeSA assesses the impacts of sustainability- and climate change-related risks identified in its Risk and Opportunity Inventory separately across the short, medium, and long-term. The time horizons used in these assessments are defined in line with the Company's strategic planning and decision-making processes, as presented below:

Time Horizon	
Short-Term	0-1 year
Medium-Term	1-5 years
Long-Term	5 years and beyond

AgeSA defines the short-term time horizon in alignment with its annual financial reporting cycle, representing the period during which operational targets are established and annual budgets are prepared. This approach enables the timely and effective monitoring of financial impacts. Within this scope, the Company aims to divest, in the short term, all companies included in the list of prohibited sectors, companies, and activities defined under its Responsible Investment Statement.

The medium-term time horizon has been determined in line with AgeSA's Scope 1 and Scope 2 greenhouse gas emissions reduction targets and is aligned with the timeframe recommended by the Science Based Targets initiative (SBTi).

The long-term time horizon has been defined by considering the period over which the impacts of chronic physical risks associated with climate change are expected to materialize. In this context, AgeSA adopts a proactive engagement approach with companies classified as high-risk within its investment portfolio and shares improvement areas aimed at enhancing their ESG performance.

As of 2024, the Risk and Opportunity Inventory includes 13 sustainability- and climate change-related risks that have been subject to a prioritization assessment. Acute physical

risks include floods, landslides, and wildfires; chronic physical risks include increases in average air temperatures, sea level rise, and water stress; and transition risks include those arising from carbon pricing mechanisms and financed emissions.

While AgeSA has initiated an assessment of the potential impacts of climate change-related opportunities on its corporate strategy, product development activities, and value chain, no climate-related opportunities that are expected to have a material impact during the reporting period have been identified. Accordingly, detailed disclosures regarding climate-related opportunities have not yet been included as of the 2025 reporting period. AgeSA is continuing to deepen its assessment of climate-related opportunities and plans to provide further disclosures in the next reporting period once measurement uncertainties associated with estimating their impacts have been sufficiently addressed.

As a result of the prioritization assessment detailed in the “Risk Management” section of this Report, two climate change-related risks have been identified by AgeSA as material:

1. Increase in average air temperatures
2. Compliance with regulatory requirements

Risk 1: Increase in average air temperatures

Risk Information	Risk Description	Impact on the Business Model and Value Chain	Impact of the Risk on Cash Flows, Access to Finance and Cost of Capital	Actions Taken by AgeSA
Risk Type	An increase in average air temperatures resulting from climate change may lead to a higher prevalence of respiratory and cardiovascular diseases, the deterioration of existing health conditions, and	The adverse sectoral and economic impacts associated with increasing average air temperatures may negatively affect operating costs and employment conditions.	The primary financial impact of rising average air temperatures on life insurance operations is expected to be an increase in claims. Health issues, environmental risks, and social challenges associated with higher	AgeSA implements both direct and indirect mitigation and adaptation measures to address climate change-related risks. In the development of life and personal
Physical Risk				
Description				
Increase in Average Air Temperatures				
Time Horizon				
Long-Term				

Impact	an increase in the incidence of severe illnesses that may result in mortality, particularly chronic obstructive pulmonary disease (COPD), cerebrovascular diseases, and pneumonia.	Expected increases in average air temperatures due to climate change are projected to create health-related impacts, particularly for vulnerable groups such as older adults, children, individuals with chronic illnesses, and outdoor workers. In this context, higher claim levels under life insurance products offered by AgeSA may create pressure on claims-to-premium ratios. Furthermore, rising healthcare expenditures combined with the economic challenges associated with increasing average air temperatures may expose existing and prospective customers to greater income volatility.	temperatures may increase uncertainty and influence demand for life insurance products. In addition, participants may experience difficulties in maintaining regular contribution payments or may exit the pension system prematurely due to factors such as increasing healthcare expenditures and adverse employment conditions. This situation may reduce predictability in long-term fund management and planning.	accident insurance products, AgeSA evaluates the social benefits of flexible payment and premium structures designed for policyholders who may become more vulnerable to income fluctuations as a result of increasing insurance penetration and the economic impacts of rising average air temperatures. These assessments are considered alongside the contribution of risk premiums to maintaining a sustainable financial structure.
Low				
Likelihood				
Highly Likely				
Value Chain Stage Where the Risk Occurs				
Customers and Investment Portfolio				
Financial Impact				
Increase in claims and pressure on claims-to-premium ratios, as well as reduced predictability in long-term fund management.				Within products and services related to the private pension system, AgeSA aims to reduce the carbon footprint of its investment portfolios by directing investments toward low-carbon sectors. At the same time, the Company considers participants' long-term return expectations and the resilience of

				pension funds against market volatility.
--	--	--	--	--

Risk 2: Compliance with Regulatory Requirements

Risk Information	Risk Description	Impact on the Business Model and Value Chain	Impact of the Risk on Cash Flows, Access to Finance and Cost of Capital	Actions Taken by AgeSA
Risk Type	Global awareness of environmental and social issues, particularly climate change, continues to increase, while regulators are introducing more comprehensive disclosure requirements. In this context, expectations for insurance companies to transparently report their ESG strategies, risks, and impacts are increasing.	This risk may have both structural impacts that could increase direct operating expenses and social impacts that could weaken reputational capital. With the increasing number of ESG-related regulatory requirements, there is a risk that AgeSA's disclosures may be considered incomplete, inaccurate, or misleading, which could result in reputational risks and lead to adverse outcomes such as reduced customer confidence and negative public perception.	The increasing disclosure requirements, together with potential regulatory sanctions, growing needs for human resources and digital infrastructure in sustainability-related data collection, analysis, reporting, and assurance processes, and the possible introduction of carbon taxes in the long-term, may lead to an increase in operating costs. Incomplete, inaccurate, or misleading disclosures may reduce interest in and demand for life insurance, private pension, and personal	AgeSA considers the assessment, continuous improvement, and development of the social, economic, and environmental dimensions of its products, services, and operational processes as an integral part of its business strategy. In managing regulatory compliance risks, AgeSA relies on its established policies and internal systems, particularly its Sustainability Policy. To ensure compliance with regulatory requirements, maintain transparent communication with all
Transition Risk				
Description				
Compliance with Regulatory Requirements				
Time Horizon				
Long-Term				
Impact				
Low				
Likelihood				
Highly Likely				
Value Chain Stage Where the Risk Occurs				
Direct Operations, Customers, and Investment Portfolio				
Financial Impact				

Operational costs required to improve data collection infrastructure and costs arising from potential regulatory sanctions.		accident insurance products. This could result in a decline in sales revenues.	stakeholders, particularly customers, and respond to stakeholders' increasing expectations regarding climate action, AgeSA began reporting climate-related risks and opportunities in alignment with the TSRS Standards in 2024.
			AgeSA manages all strategically significant issues by considering not only applicable legal requirements but also international best practices and the expectations of its key stakeholders.

Impact of Climate-Related Risks on the Business Model and Value Chain

The Company’s historical loss events provide important insights into potential future loss risks. Accordingly, when determining the scope of risk impacts, both the current and anticipated impacts of risks are taken into consideration. In assessing the impacts of climate change-related risks on its business model and value chain, AgeSA considers historical claims data alongside projected risk trends.

In light of these impacts, reviewing the business model under different climate scenarios and restructuring product coverage where necessary are considered important for enhancing the long-term resilience of the business model.

AgeSA's core business activities include life insurance, private pension and savings products, personal accident insurance, asset management, and general insurance. Climate change-related risks that have the potential to affect AgeSA's business model are assessed based on portfolio exposure. Changes in customer behavior, particularly in relation to life insurance claims, may intensify the financial impacts of these risks. While the effects of extreme temperatures vary across regions, regulatory requirements continue to increase in parallel with global developments. This may necessitate the reassessment of risk premiums, coverage structures, and portfolio allocation across certain product groups. In addition, increasing physical risks may create upward pressure on reinsurance costs and risk transfer strategies. As a result, the impacts of these risks may differ across regions and business activities.

Climate change-related risks that may affect AgeSA's value chain are assessed based on the extent to which they impact stakeholders. Within this framework, the stakeholder group most significantly affected by each risk is identified. AgeSA's stakeholder groups are categorized into three groups* as follows:

- **Upstream value chain:** providers of goods, services, energy and infrastructure; reinsurance providers; consultants; and financing providers
- **Downstream value chain:** market and community stakeholders, regulatory authorities, customers, and investment portfolio stakeholders
- **Direct operations:** employees; product, service, and customer management functions; financial and corporate governance functions; subsidiaries; and agencies

* Detailed information on the value chain can be found in the "About the Report" section.

As the risk of increasing average air temperatures is considered a risk that directly affects customers within the downstream value chain, the product portfolio offered to customers is also expected to be directly affected. The risk related to compliance with regulatory requirements, on the other hand, is considered to have the potential to affect the entire value chain.

Strategy and Decision-Making

AgeSA continuously undertakes initiatives aimed at improving its direct and indirect sustainability performance. The Company evaluates climate change-related risks and opportunities based on their impact and priority levels and integrates them into its strategic decision-making processes. In this context, product development, portfolio management, and risk acceptance criteria are shaped in line with the outcomes of risk assessments and scenario analyses.

To address climate change-related risks and opportunities, AgeSA has established targets under the key topics of sustainable products and services, responsible investments, customer experience and satisfaction, and environmental performance, which are prioritized within its “Impact-Focused Organization” strategy. Metrics have been defined to monitor these targets, and the targets and action plans have been incorporated into the performance evaluation processes of the teams responsible for implementing, managing, and monitoring related projects.

Investments in digital infrastructure to comply with increasing ESG reporting requirements, directing private pension portfolios toward low-carbon investments, and expanding the coverage of insurance products to address the risks associated with increasing average air temperatures are among the transformations envisaged within the business model.

In line with its Sustainability Policy, AgeSA manages all strategically significant issues by considering not only applicable legal requirements but also international best practices and the expectations of its key stakeholders. The Company regards the assessment, continuous improvement, and development of the social, economic, and environmental dimensions of its products, services, and operational processes as an integral part of its business strategy. Accordingly, in managing risks related to compliance with regulatory requirements, AgeSA relies on its established policies and internal systems, particularly its Sustainability Policy.

When assessing climate-related risks and opportunities, AgeSA considers the balance between environmental, social, and financial impacts within its product development

processes. Decisions regarding coverage expansion in life and personal accident insurance products are made by jointly evaluating social benefits and financial risks. Within the private pension business, while the carbon footprint of investment portfolios is reduced through low-carbon investments, participant returns and fund resilience are also taken into consideration. Product strategies are designed to provide flexible payment structures that support social inclusion, while the impacts of these structures on financial sustainability are also evaluated. In this way, environmental, social, and economic factors are addressed within a holistic framework. Under this approach, sustainability-focused decision-making processes consider environmental benefits, social inclusion, customer trust, market risk, regulatory expectations, and reputation management in an integrated manner.

Transition Plan

AgeSA shapes its climate change-related transition plan in line with the Sabancı Group's Net Zero commitment, through its own Net Zero commitment submitted to the Science Based Targets initiative (SBTi) and its Responsible Investment Statement. The plan is primarily built upon emissions reduction targets, investment portfolio transformation, and sustainable product and service development strategies.

Key assumptions underlying the transition plan include: the target of reducing Scope 1 and Scope 2 emissions by 75% by 2030; the target of ensuring that 47% of the investment portfolio by 2030 and 100% by 2040 consists of companies with Science-Based Targets; the expectation of increasing demand for sustainable financial products; and the assumption that carbon-related regulations will become more stringent over time.

Climate Transition and Adaptation Efforts

Actions addressing climate change-related risks and opportunities are carried out under four main pillars: operational emissions reduction, adaptation through sustainable products and services, responsible investment practices, and stakeholder collaborations.

Direct Mitigation and Adaptation Efforts

Operational Emissions Reduction

Among the strategic targets established to improve environmental performance is the achievement of net zero emissions by 2050. In line with this objective, energy consumption and greenhouse gas emissions arising from AgeSA's operations are calculated, and plans are developed to reduce the Company's impacts on the climate and the environment.

As in 2023, AgeSA continued in 2025 to purchase renewable energy certificates equivalent to the total electricity consumed at its headquarters and sales offices, in line with its emission reduction targets, and documents these certificates through the International Renewable Energy Certificate (I-REC) system. To reduce the environmental impact of energy consumption, the vehicles used by AgeSA were replaced with hybrid vehicles in 2021. In addition, the Company aims to replace 50% of its corporate vehicle fleet with electric vehicles by 2030. Furthermore, digitalisation and remote working models contribute to reducing energy consumption and the carbon footprint associated with office operations. The hybrid working model decreases both travel requirements and in-building energy demand. As a result of initiatives implemented to achieve high performance in energy efficiency, water efficiency, acoustic insulation, material selection, and indoor environmental quality, AgeSA was awarded the LEED Gold Green Office Certification in 2022. Through digital transformation initiatives such as the mobile application, biometric signature, voice confirmation, and remote sales practices, approximately 31.5 million pages of paper printing and the felling of 1,434 trees were prevented in 2025. As a result, 590 tonnes of CO₂ emissions were avoided.

Indirect Mitigation and Adaptation Efforts

Adaptation Through Sustainable Products and Services

Climate change-related increases in average temperatures are expected to have health-related impacts, particularly on vulnerable groups such as the elderly, children, individuals with chronic illnesses, and outdoor workers. As this situation may lead to an increase in

claims, particularly under health and life insurance policies, AgeSA implements various adaptation measures across its product offerings and insured experience. In this context, the addition of the Critical Illness Coverage to the Kredim Güvende and VIP Hayat products provides long-term protection against the potential increase in cardiovascular, respiratory, and chronic diseases by covering 12 different illnesses. In addition, in 2025, unemployment coverage limits were updated in line with current market conditions, and the revolving unemployment coverage previously offered for loans with a minimum maturity of nine months was revised to six months. By simplifying the revolving coverage structure, the “Unemployment” coverage for salaried employees and the “Daily Hospitalisation” coverage, with an improved waiting period under a customer-centric approach, for other employment statuses were introduced.

In addition, preventive supplementary benefits such as check-up services, home care packages, and healthcare packages integrated into personal accident insurance products are designed to mitigate the effects of climate-related health risks.

Furthermore, flexible payment infrastructures and financial literacy programmes have been developed for policyholders whose income may become more vulnerable to fluctuations due to the economic impacts of rising average temperatures. Through these products and services, actions are taken to enhance portfolio activity. The Hayata Yatırım Insurance product increases resilience against economic shocks by providing customers with the flexibility to suspend premium payments, borrow against accumulated savings, or adjust the coverage coefficient. Similarly, the Her İhtimalin Sigortası and İyi İhtimaller Sigortası products offer restructuring options, such as premium reductions or extensions of payment terms within the policy period, for customers experiencing payment difficulties. Through Financial Therapy, designed to improve financial literacy and support individuals in achieving their financial goals, the “Your Financial Literacy Journey” YouTube series has helped individuals improve their financial well-being by examining their financial behaviours, attitudes, and habits. In addition, the digital fund advisory application FonPro enables individual pension customers with different fund management needs and expectations to manage their savings according to their financial literacy levels.

In line with its sustainable product and service development strategies, AgeSA has incorporated Sustainable Development Goal-related features into 18 products within its portfolio and, in 2025, increased the number of SDG-linked services to 8 and the share of revenue generated from SDG-linked products and services to 51%. These practices constitute direct adaptation strategies aimed at supporting policyholders' protection against the health and economic impacts of climate change.

The effectiveness of the products and services developed within this scope is monitored not only through financial and portfolio indicators but also through customer behaviour and feedback. AgeSA conducts awareness-raising communications and digital content initiatives to enhance customers' understanding of climate-related health and economic risks, thereby supporting more informed decision-making.

At the same time, changes in customer needs and expectations are analysed regularly, and the insights obtained are integrated into product development processes. This approach supports the development of products and services that are aligned with evolving risk profiles.

The effectiveness of the products and services offered is measured through customer experience indicators, and in 2025, the Relative Net Promoter Score (RNPS) reached 71. This performance is considered an indicator supporting AgeSA's capability to adapt to changing customer needs arising from climate change.

Responsible Investment

AgeSA considers the impacts of rising average temperatures and regulatory compliance risks on its investment portfolio. AgeSA's inclusion in the BIST Sustainability Index enhances the visibility of its long-term sustainability commitment in financial markets and directly contributes to the credibility and growth trend of its fund performance. Through this visibility, increased income generated through funds and sustained investor interest contribute to strengthening AgeSA's equity base and enhancing its investment capacity.

AgeSA has adopted an approach that places sustainability principles at the core of its investment decisions. Within this scope, a comprehensive due diligence process was conducted to assess the ESG risks of all companies included in the investment portfolio in line with the Sabancı Holding Responsible Investment Policy. Through AI-supported analyses based on publicly available data, companies within the investment portfolio were evaluated according to the countries and sectors in which they operate, as well as their alignment with the Ten Principles of the United Nations Global Compact. Based on the findings, an action plan was established. According to the action plan developed following the evaluation of the due diligence results, all companies included in the prohibited sectors, companies, and activities list are targeted to be removed from the investment portfolio by the end of 2025. By the end of 2030, a proactive engagement approach is planned for companies classified as high risk, involving the sharing of improvement areas to enhance their ESG performance, while the ESG performance of companies assessed as having medium and low risk levels will continue to be monitored and evaluated regularly.

Through the Sustainability Equity Pension Investment Fund, AgeSA offers individual pension participants a new investment opportunity while also enabling financial support and resources to be directed to companies investing in this area. By incorporating the Sustainability Equity Pension Investment Fund into FonPro's new recommendation packages and sending seed balls on behalf of customers choosing this fund, customers have been encouraged to invest in sustainable investments, supporting the fund's growth and wider adoption.

Among the eight new funds added to the fund portfolio to help individual pension participants make the most effective use of their savings, the energy fund supports companies operating in the clean energy sector, while the agriculture and food fund supports companies engaged in sustainable agriculture and food activities.

Stakeholder Engagement and Collaboration

AgeSA adopts a transparent and comparable reporting approach in its climate-related disclosures, taking stakeholder expectations into consideration. Within this scope,

sustainability performance is disclosed regularly in line with national and international standards, and open communication is maintained with stakeholders.

AgeSA reports its sustainability and climate performance through sustainability reports prepared in accordance with the GRI Standards, climate-related risk and opportunity disclosures aligned with the TCFD framework, and climate-related financial disclosures prepared in accordance with TSRS requirements.

In addition, AgeSA has continued to be included in the BIST Sustainability Index since 2022. Furthermore, AgeSA supports the sustainability-focused entrepreneurship ecosystem and, through the ITU Çekirdek program, provided a total of TRY 1 million in financial support to ventures creating environmental and social value in 2025.

Investments Made to Address Climate-Related Risks

AgeSA implements various innovations in its products and business processes and plans further improvements to make life easier for its customers who are expected to be most affected by climate change-related risks. Rising average temperatures may influence customers' healthcare expenditures and their preferences for long-term savings instruments. To facilitate and expand access to the Private Pension System (PPS), AgeSA launched end-to-end digital PPS sales through the AgeSA Mobile application as one of the most critical milestones of its multi-channel strategy. In line with its vision of addressing individuals' insurance needs through a holistic approach, AgeSA began offering the "Supplementary Health Insurance" product in collaboration with Medisa. Through this strategic initiative, the Company complemented its life and pension product family with health-related offerings and established a strong healthcare ecosystem that provides customers with 360-degree financial protection. AgeSA's new Supplementary Health Insurance product supports customers throughout their healthcare journey with its budget-friendly structure, flexible coverage options, and digital solutions.

AgeSA also introduced its internally developed artificial intelligence-based recommendation engine ("AI-based Recommender Engine"). Through this system, which

analyses customers' financial histories and digital footprints, AgeSA has started offering fully personalized proposals through the AgeSA Mobile application.

In addition, AgeSA prioritizes sustainability criteria in its investment decisions. As part of studies planned to be conducted every two years to perform ESG risk analyses of all companies within its investment portfolio, AgeSA has also addressed rising average temperatures and regulatory compliance risks, which are considered among climate change-related risks. In line with the action plan developed following the evaluation of the due diligence process results, all companies included in the prohibited sectors, companies, and activities list have been removed from the investment portfolio. Furthermore, by the end of 2030, AgeSA plans to adopt a proactive engagement approach with companies assessed as being in the high-risk category by sharing areas for improvement aimed at enhancing their ESG performance. The ESG performance of companies assessed as having medium and low risk levels continues to be monitored and evaluated regularly.

Financial Position, Financial Performance and Cash Flows

AgeSA has quantitatively assessed the impacts of the climate change-related risks it has identified on its financial position, financial performance, and cash flows, as well as the anticipated impacts over the short, medium, and long-term.

Accordingly, to identify the risk of rising average temperatures, which has been defined as a climate change-related risk, and to analyze its potential impacts on the customer portfolio, AgeSA used data published by the Turkish Statistical Institute (TurkStat) for the 2018-2024 period. Within the scope of the analysis, deaths expected to increase due to rising average temperatures were assessed based on circulatory system diseases (ischaemic heart disease, heart failure, and cerebrovascular diseases) and respiratory system diseases (pneumonia and COPD). In calculating temperature-related mortality, the proportion of deaths caused by these diseases within total deaths resulting from respiratory and circulatory system diseases was taken as the basis, and it was assumed that this proportion was similar across all geographical regions. In addition, in line with academic studies [1][2], it was assumed that 4.4% of circulatory system diseases and 5% of respiratory system

diseases were associated with extreme temperatures, and quantitative analyses were carried out based on these ratios.

In this study, projections for 2025 were developed using the Compound Annual Growth Rate (CAGR) method based on six years of historical data (2018-2024). It was also assumed that the regional distribution of death benefit coverages would remain applicable to 2025 death and disability claims. In order to estimate the medium and long-term impacts of the relevant risk, projections covering the years 2030, 2035, 2040, 2045, and 2050 were prepared, taking into consideration the RCP 2.6 and RCP 8.5 scenarios. Scenarios for Türkiye's seven geographical regions were developed based on the indicator "Change in the Proportion of Population Exposed to Extreme Heat Annually".

As a result of these analyses, the financial impacts of the risk associated with rising average temperatures were evaluated within the framework of the materiality criteria applied in financial reporting. The materiality threshold approved by Senior Management was determined as 5% of Profit Before Tax (PBT). Based on the assessment performed, as the expected impacts on the Company remained below the financial materiality threshold, it was concluded that the financial effects of climate change-related risks and opportunities would not be disclosed quantitatively, while their impacts would be explained qualitatively. Details regarding the quantitative financial impact calculations of the relevant risks and the scenarios used are disclosed in the Scenario Analysis section.

The analyses indicate that increasing average temperatures may create indirect financial impacts on the business lines in which AgeSA operates. These impacts arise through both insurance technical results and customer behavior.

In this context, health risks associated with rising temperatures may lead to an increase in claims under life insurance products. In addition, increasing healthcare expenditures may result in disruptions to participants' contribution payments or an increase in early withdrawals from the system. This may create risks related to fluctuations in income streams and reduced predictability in long-term fund management.

The impacts of climate change-related risks on the investment portfolio are also taken into consideration. Within this scope, ESG risk analyses are conducted for companies included in the investment portfolio, and action plans are developed according to risk levels. While engagement with high-risk companies is increased, the alignment of investment decisions with sustainability criteria is strengthened through targets aimed at removing prohibited activities from the portfolio. This approach is expected to contribute positively to long-term investment income and fund management.

The current effects of these impacts are monitored primarily through claims. In this context, AgeSA aims to provide fast and effective services to its customers and paid total claims of TRY 780 million in 2025, representing a 9% increase compared to the previous year. The short-term financial impacts of identified climate change-related risks and opportunities are defined as 0-1 year. Based on the assessments performed, it was determined that the short-term financial impacts of the risk associated with rising average temperatures remained below the established materiality threshold. Therefore, no quantitative financial impact has been disclosed for this risk; however, its potential impacts have been assessed qualitatively through factors such as increased costs, additional obligations, and income fluctuations.

The financial impacts of regulatory compliance risk cannot yet be estimated quantitatively in a reliable and decision-useful manner, as the currently available datasets are not sufficient to produce reliable quantitative forecasts. Accordingly, the financial impacts of this risk are addressed qualitatively, and developments are monitored regularly.

Scenario Analyses

AgeSA, manages climate change-related physical and transition risks, together with associated opportunities, through scenario analyses. In this context, the study initiated in 2022 based on the TCFD methodology was updated through the Risk and Opportunity Inventory conducted in 2024, and the resulting findings were integrated into strategy and risk management processes in line with the TSRS 2 framework. The analyses are conducted by considering international frameworks (Global

Risks Report, etc.), sectoral trends, national developments, stakeholder expectations, and the business and future strategies of our partners.

In the scenario analyses, internationally recognized reference scenarios covering both low-emission (aligned with the Paris Agreement) and high-emission pathways have been used. For the analysis of transition risks, the STEPS, APS, and NZE scenarios published by the IEA are used, while the RCP2.6 and RCP8.5 scenarios developed by the IPCC form the basis for the analysis of physical risks. In addition, NGFS scenarios enable the assessment of the potential impacts of physical and transition risks on the financial system. NGFS Below 2°C and RCP2.6 have been applied under low-emission scenarios, while NGFS Current Policies and RCP8.5 have been used under high-emission scenarios, with outcomes tested under varying levels of uncertainty throughout the 2020-2100 period.

The analyses take into consideration short-term (0-1 year), medium-term (1-5 years), and long-term (5 years and beyond) time horizons, with risks assessed as becoming more prominent particularly in the medium and long-term. Scenario analyses have been conducted to cover AgeSA's life insurance, personal accident insurance, and private pension activities.

In addition, the analyses consider the potential costs of carbon pricing and ETS mechanisms, the impacts of sustainability regulations on investment preferences, energy price fluctuations, technological developments, and the pace of sectoral transformation. National and regional variables, such as macroeconomic trends, population and urbanization dynamics, regional weather events, land use, infrastructure adequacy, and access to natural resources, have been incorporated in a manner consistent with IPCC AR6 and NGFS assumptions.

For Türkiye's Marmara, Aegean, Black Sea, Mediterranean, Central Anatolia, Eastern Anatolia, and Southeastern Anatolia regions, the impacts of hazards such as floods, wildfires, extreme weather events, and rising average temperatures have been monitored, and exposure assessments have been conducted using indicators such as the "change in the proportion of population exposed to extreme heat annually." These findings have been

used to understand potential impacts on customer behavior and health risks within our life insurance and personal accident portfolios.

The scenario analyses indicate that transition risks become more prominent under low-emission scenarios. Despite increasing carbon pricing and regulatory pressures, these impacts remain limited due to AgeSA's low-carbon operational structure. Under middle-path scenarios, both physical and transition risks are expected to evolve in a balanced manner, leading to increased uncertainties regarding customer behavior and financial decisions. Under high-emission scenarios, physical risks are projected to increase significantly, resulting in a higher likelihood of health risks, claim frequency, and changes in customer behavior.

The scenario analyses indicate that risks are expected to become more pronounced in the medium to long-term, while only limited impacts are anticipated on our product portfolio, investment portfolio, and financial performance in the short term. Details regarding the assessment of financial impacts are presented in the "Financial Position, Financial Performance and Cash Flows" section.

AgeSA Climate Resilience Assessment

Analyses conducted under different climate scenarios indicate that AgeSA's business model demonstrates overall resilience against climate change-related risks and opportunities. However, the intensity of risks and the nature of their impacts vary across scenarios. While transition risks become more prominent under low-emission scenarios, physical risks become more pronounced under high-emission scenarios. This assessment has been prepared based on the outputs of scenario analyses conducted using low-, medium-, and high-emission scenarios published by the IEA, NGFS, and IPCC.

When all scenarios are evaluated collectively, AgeSA's climate resilience is shaped around the following key elements:

Operational structure: Due to its low carbon intensity, level of digitalization, and cost-efficient business model, the impact of carbon pricing and regulatory changes on operational costs remains limited.

Products and services structure: Preventive services, expanded coverages, and flexible product structures developed in response to the expected increase in health-related risks and economic fluctuations contribute to managing potential impacts on customers and the portfolio.

Investment approach: The consideration of ESG criteria within the investment portfolio, the implementation of actions targeting high-risk assets, and the expansion of sustainable investment instruments support the limitation of the financial impacts of both transition and physical risks.

Customer behavior and portfolio dynamics: Through practices that provide financial flexibility and solutions that support customer loyalty, the impact of demand fluctuations on the portfolio during periods of economic uncertainty is mitigated.

At the same time, particularly under high-emission scenarios, it is assessed that there is potential for an increase in claims and compensation requests associated with health risks. This may create additional management requirements in terms of product pricing, risk selection, and reinsurance strategies. Overall, AgeSA's product design, investment management, and operational structure have been developed in a manner that can balance the impacts that may arise under different climate scenarios, thereby supporting the Company's resilience to climate change over the medium and long-term.

Risk Management

Risk Management Framework

The AgeSA Risk Management Framework includes the strategies, policies, models, processes, and reporting procedures required for the identification, measurement,

management, monitoring, and reporting of all risks. Within the scope of the Risk Management Framework, the Risk Management Framework Policy has been established to determine the fundamental principles and standards regarding the risk management system and processes, implement the risk management system and processes specified in the policy, and ensure compliance with the established risk limits.

AgeSA's Risk Management Framework consists of five core components structured on the basis of a corporate risk culture. From top to bottom, this structure comprises the following elements:

1. Risk Culture,
2. Risk Strategy, Objectives and Risk Appetite,
3. Risk Governance, Risk Classification, CRM Policy and Model Framework,
4. Risk Management Processes, and
5. Data, Information Technologies and Infrastructure.

Risk management processes cover the stages of risk identification, assessment and prioritization, risk response and control, and risk monitoring and reporting. In this process, both existing and emerging risks are systematically identified, and risks are classified according to their likelihood and impact levels. During the assessment stage, inherent risk, residual risk, and projected residual risk calculations are performed, and the potential impact of risks on the Company is used as the basis for prioritization decisions. Actions related to identified risks are managed through control strategies established using methods such as "avoidance," "mitigation," "acceptance," or "transfer." All processes are supported through continuous monitoring, assessment of risk exposure, and follow-up of actions.

The policies established to ensure effective risk management at AgeSA are monitored through a holistic approach and implemented within the scope of the risk management framework. In this context, in addition to the Risk Management Framework Policy prepared

specifically for each risk type to which AgeSA is exposed, there are a total of seven risk policies, namely the Life Insurance, Credit, Market, Liquidity, Conduct, and Operational Risk Policies.

Within the scope of its risk classification, AgeSA manages the risk categories it has defined through the three lines of defense framework. The duties and responsibilities of the three lines of defense are defined below:

Line of Defense	Responsible Parties	Authority and Responsibilities
1st Line of Defense	Company Management	Identification, assessment, management and reporting of risks in an effective manner and within the approved risk appetite; ensuring compliance with Company policies. Establishing and maintaining an effective internal control system.
2nd Line of Defense	Risk Management, Internal Control and Compliance Directorate	Supporting Company Management in the identification, assessment, management and reporting of risks; overseeing compliance with Company policies and the remediation of non-compliances; supporting the effectiveness of the AgeSA Risk Management Framework. Providing reasonable assurance that assets are safeguarded through the internal control structure, operations are conducted effectively and efficiently, financial reports are reliable, and the integrity of services and the timely availability of information are maintained.
3rd Line of Defense	Internal Audit	Providing assurance to the Board of Directors, from an objective and independent perspective,

		regarding the effectiveness of the Company's risk management and internal control environment.
--	--	--

Processes related to climate change risks are managed in line with the three lines of defense model.

Assessment and Prioritization of Risks and Opportunities

Impact and likelihood parameters are used in the assessment of risks. When conducting a risk assessment, the risk owner performs both an inherent risk assessment and a residual risk assessment. The threshold values to be used for impact and likelihood assessments are determined through the approved Company Materiality Framework.

The impact parameter used in the assessment and prioritization of risks is measured qualitatively through four impact dimensions: financial loss, non-compliance with legal regulations, customer detriment, and reputational damage.

In determining financial loss, direct costs are taken into consideration. These include cost items such as expenses and impairments affecting the income statement, payments made to compensate customer losses, and remediation costs incurred as a result of the realization of a risk. The rating of financial loss impact is determined according to the level of materiality, and this quantitative metric is defined in monetary terms. Customer impact is defined as the extent to which a risk results in customer losses and complaints. Reputational impact arises from the erosion of stakeholders' trust in AgeSA. The impact of non-compliance with legal regulations may result in sanctions or penalties arising from legal obligations or deficiencies in reporting.

Impact levels are scored on a scale of 1 to 5 as very low, low, medium, high, and very high. Accordingly, risks that may result in significant financial losses and require structural changes to the current business model if realized are defined as having a very high impact.

In contrast, risks that do not materially affect operating results and result in limited financial consequences that can be managed with ease are classified as low-impact risks.

The likelihood parameter refers to the frequency with which the events giving rise to a risk may occur. Likelihood assessment is based on defined time horizons, and likelihood levels are scored on a scale of 1 to 5 as remote, unlikely, possible, probable, and highly probable.

Risk Assessment Matrix

		Deemed not acceptable				
Impact	Very High	3	4	5	5	5
	High	2	3	4	5	5
	Medium	1	2	3	4	5
	Low	1	1	2	3	4
	Very Low	1	1	1	2	3
		Rare	Remote	Possible	Likely	Very Likely
		Probability				

Identified and assessed risks are submitted to the Risk Management, Internal Control and Compliance Directorate and reviewed within the scope of the existing Risk Management Framework.

Management of Sustainability and Climate-Related Risks and Opportunities

AgeSA manages sustainability- and climate change-related risks and opportunities as an integral part of its overall risk management system. Responsibilities related to the monitoring, management, and oversight of sustainability-related risks and opportunities at AgeSA are carried out under the coordination of the Audit Committee, the Early Detection of Risk Committee, and the Sustainability Committee. Oversight of these responsibilities is provided by the Board of Directors, which holds ultimate accountability. The responsibilities

of the governance bodies with respect to risk management are described in the “Governance” section of this report.

The processes for identifying, assessing, prioritizing, and monitoring sustainability- and climate change-related risks and opportunities are carried out with the participation of the relevant business units under the coordination of the People, Culture and Sustainability Group Directorate. Risks identified through this process are communicated to the Risk Management, Internal Control and Compliance Directorate and reviewed within the scope of the Company's existing Risk Management Framework.

Sustainability- and climate change-related risks are included within the Company's “Operational Risks” and “Strategic and Business Risks” categories. Emerging climate change-related risks and opportunities are detailed under environmental risks within the scope of “Emerging Risks.” These risks are elaborated as part of risk management activities and submitted to Company Management for information and evaluation. These risks are integrated into AgeSA’s overall risk management system.

AgeSA has developed a comprehensive Risk and Opportunity Inventory to systematically identify, assess, prioritize, and monitor sustainability- and climate change-related risks. These efforts, which were initiated within the scope of the TCFD¹ Report published in 2022, were updated and expanded as of 2024 in line with TSRS reporting requirements. The Risk and Opportunity Inventory specifies the stage of the value chain at which a risk is concentrated and whether the scope of the risk has a local, national, or global impact. Within this inventory, risk definitions are developed in accordance with the various scenario analyses included in the “Strategy” section of this report.

Key parameters used in the assessment of identified risks include the likelihood of occurrence, the potential impact on the Company (operational, financial, market, technology, compliance, and reputational), the impact on the value chain (direct operations, upstream value chain, and downstream value chain), and timing (short-, medium-, and long-

¹ As of 2024, it operates under the ISSB.

term). In addition, physical risks (such as climate events including floods, landslides, wildfires, increases in average air temperatures, sea level rise, and water stress risks) and transition risks (such as risks arising from carbon pricing mechanisms and financed emissions) are analyzed under separate categories and integrated into the risk matrix.

In line with its risk management framework, AgeSA uses a Risk Assessment Matrix that considers impact and likelihood criteria in the prioritization of climate-related risks and opportunities. Within the Risk Assessment Matrix, the red and orange zones are assessed as situations outside the tolerance level, while the green zones are assessed as situations within the tolerance level. This approach enables climate change-related risks to be addressed in a more detailed and analytical manner. Accordingly, these risks are monitored and action plans are developed to address them. As a result of this assessment, climate-related risks and opportunities that fall outside the tolerance level, based on the risk score obtained by multiplying the impact and likelihood scores, are prioritized within the scope of reporting.

Metrics and Targets

AgeSA regularly monitors and evaluates its exposure and performance in relation to climate change-related risks and opportunities to ensure their effective management. The metrics used for this purpose include greenhouse gas emissions, energy consumption, portfolio composition, and climate-related financial and operational indicators. These metrics are used to monitor AgeSA's resilience to climate change-related risks, support strategic decision-making processes, and assess progress toward established targets. This section presents climate-related metrics, as well as performance results and targets based on these metrics.

Climate-Related Metrics

When determining its organizational boundaries for greenhouse gas emissions reporting, AgeSA has adopted the operational control approach. Accordingly, AgeSA Sigorta Aracılığı

A.Ş. and Medisa Sigorta A.Ş., which are subsidiaries under AgeSA's operational control, have been included within the scope of the emissions inventory.

Greenhouse gas calculations are performed in accordance with the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard Methodology, using greenhouse gas emission factors published by the Turkish Electricity Transmission Corporation (TEİAŞ) and the Intergovernmental Panel on Climate Change (IPCC), and are verified by independent third parties.

Greenhouse Gas Emissions (tCO₂e)	2024*	2025
Scope 1	1.077	1.191
<i>Stationary Combustion</i>	38	36
<i>Mobile Combustion</i>	1.039	1.155
Scope 2 (Location based)	243	288
Scope 2 (Market based)	0	0

AgeSA's direct greenhouse gas emissions consist of emissions arising from natural gas used for heating systems and gasoline and diesel fuels consumed by vehicles in the Company's fleet.

Scope 2 (market-based) emissions have been reduced to zero through the offsetting of electricity consumption-related emissions with International Renewable Energy Certificate (I-REC) certification. In 2025, renewable energy consumption accounted for 100% of total electricity consumption.

No internal carbon price has been directly established for AgeSA. Nevertheless, AgeSA assesses its forward-looking plans by integrating into its processes the shadow carbon pricing approach followed by Sabancı Holding, of which it is a subsidiary.

AgeSA did not accumulate or purchase any carbon credits during the reporting period. As the achievement of greenhouse gas emissions targets does not rely on carbon credits, the use of any carbon credits verified or certified under third-party programmes is not currently planned. The assessment process for future periods remains ongoing.

AgeSA evaluates the TSRS 2 Insurance sector metrics in line with its business model. As the Company does not provide physical damage coverage for insured assets, it is not exposed to direct loss risks arising from natural disasters, and therefore metric FN-IN-450a.1 (PML) is not applicable. No monetary losses were incurred under this scope during the reporting period. Detailed explanations are provided in the "Appendices" section.

In this context, as an indicator of the magnitude of assets and activities vulnerable to climate-related physical risks, AgeSA assesses its exposure to physical risks associated with rising average temperatures through its life insurance portfolio, in line with its business model. Accordingly, the share of the life insurance and private pension portfolio within the total portfolio is monitored as an indicator of the magnitude of assets and activities vulnerable to climate-related physical risks. In addition to exposure indicators, the claims-to-premium ratio of the life insurance portfolio is monitored as one of the key performance indicators in order to track the potential impacts of physical risks on insurance operations. In this regard, the ratio was 10% in 2024 and 7% in 2025.

By evaluating indicators such as portfolio distribution and the claims-to-premium ratio together, AgeSA monitors both the exposure to and the potential impacts of physical risks associated with climate change through a holistic approach.

Climate-Related Targets

To enhance its resilience to climate change and support the transition to a low-carbon economy, AgeSA implements carbon reduction strategies in line with Sabancı Holding's Net Zero Carbon Footprint Project and aims to achieve Net Zero emissions by 2050 by establishing its emission reduction targets on a scientific basis in alignment with the SBTi. AgeSA's emission reduction and net-zero targets have been shaped in accordance with the

international framework established by the Paris Agreement and Türkiye's commitments within this framework.

In line with its 2050 net-zero target, AgeSA calculates the energy consumed and greenhouse gas emissions generated through its operations and develops plans to reduce them in order to lessen its impacts on the climate and the environment. For the combined total of Scope 1 and Scope 2 emissions, AgeSA targets a 75% reduction by 2030 compared with the 2019 baseline through measures including the transition to hybrid vehicles within the Company fleet, energy efficiency initiatives in offices, and remote working practices, in addition to replacing 50% of Company vehicles with electric vehicles. From the 2019 base year to 2025, Scope 1 and Scope 2 emissions decreased by 37%.

AgeSA's emissions reduction target primarily covers Scope 1 and Scope 2 emissions arising from office operations, building energy consumption, and Company vehicles, as well as a long-term portfolio alignment strategy for investment-related Scope 3 emissions.

Adopting a gradual divestment strategy from carbon-intensive sectors within its investment portfolio, AgeSA implements a comprehensive roadmap to align its portfolio with the Paris Agreement in line with Sabancı Holding's Responsible Investment Policy and SBTi targets. Within this framework, in accordance with the SBTi Portfolio Coverage methodology, AgeSA targets that 47% of the companies in its investment portfolio will have Science-Based Targets by 2030, based on the 2021 baseline year, and that all portfolio companies will have Science-Based Targets by 2040.

To this end, the following action plan is being implemented:

- Divestment, by the end of 2025, from all companies included in the list of prohibited sectors, companies, and activities under Sabancı Holding's Responsible Investment Policy;
- Proactive engagement with high-risk companies by the end of 2030 to identify and communicate areas for improvement in their ESG performance;

- Regular monitoring and assessment of the performance of medium- and low-risk companies.

Through this three-stage strategy, AgeSA aims to manage ESG risks within its investment portfolio more effectively and support portfolio companies throughout their sustainability journey.

Events After the Reporting Date

No event that would have a material impact on the Company within the scope of this TSRS Report occurred between the end of the reporting period and the date of approval of this report.

Appendix

Guidance on the Industry-based Application of IFRS S2 – Volume 17: Insurance

Table 1. Sustainability Disclosure Topics and Metrics

Topic	Metric	Category	Unit of Measure	Code	AgeSA's Response
Integration of ESG Factors into Investment Management	Description of the approach to incorporating ESG factors into investment management processes and strategies	Discussion and Analysis	N/A	FN-IN-410a.2	AgeSA aims to support the transition to a low-carbon economy and enhance its resilience to climate change by systematically integrating ESG factors into the management of its investment portfolio. This approach has been shaped in line with the carbon reduction strategies established under Sabancı Holding's Net Zero Carbon Footprint Project and its Responsible Investment Policy.

					A gradual divestment strategy from carbon-intensive sectors has been adopted in portfolio management, and investment assets are being aligned with the Paris Agreement and the SBTi. AgeSA conducts ESG risk analyses for all companies within its portfolio and implements a comprehensive roadmap based on these analyses. Within this process: 1. Portfolio companies are expected to establish net zero emissions targets by 2040, and progress against these commitments is monitored. 2. ESG standards have been established across the value chain, identified risks have been categorized, and root cause analyses have been conducted. 3. A risk map has been developed through AI-supported analyses using publicly available data, and the ESG alignment levels of portfolio companies have been assessed. 4. Compliance and non-compliance weightings relating to ESG violations have been calculated, and corrective action plans have been developed based on the results. In this context, a three-phase action plan has been adopted:
--	--	--	--	--	---

					1. By the end of 2025, sectors, companies, and activities prohibited under Sabancı Holding's Responsible Investment Policy will be excluded from the portfolio. 2. By 2030, engagement will be established with companies carrying high ESG risk, and concrete actions will be taken to improve their sustainability performance. 3. The performance of medium- and low-risk companies will be monitored regularly, and supportive interventions will be implemented where necessary. Through this multi-layered approach, AgeSA aims to effectively manage ESG risks within its investment portfolio, safeguard long-term financial stability, and contribute to the sustainability targets of portfolio companies.
Policies Designed to Incentivize Responsible Behavior	Net premiums written related to energy efficiency and low-carbon technology	Quantitative	Presentation currency	FN-IN-410b.1	AgeSA operates in the life insurance, personal accident insurance, and private pension business lines. Due to the nature of these lines of business, underwriting activities are not conducted for policies directly related to energy efficiency or low-carbon technologies. Accordingly, AgeSA does not offer products or services directly related to renewable

					energy insurance, energy savings guarantees, carbon capture, or carbon storage. Therefore, no net premiums were written from policies falling within this scope during the reporting period.
	Discussion of products or product features that incentivize health-, safety-, or environmentally responsible actions or behaviors.	Discussion and Analysis	N/A	FN-IN-410b.2	AgeSA develops SDG-linked products and services to support the transition to a low-carbon economy and enhance social well-being, thereby strengthening its value proposition to customers while transitioning to a more sustainable business model. As of year-end 2025, revenue generated from 18 SDG-linked products and 8 services reached 51% of total revenue. The size of AgeSA's sustainability fund, which invests in accordance with ESG criteria, reached TRY 1.8 billion as of year-end 2025. AgeSA delivers products, services, and initiatives that create value for the environment, society, and all stakeholders, including digital private pension products that support reductions in carbon footprint; audio guidance services for visually impaired customers and sign language-supported video call services for hearing-impaired customers through its digital platforms;

					unemployment and critical illness coverage offered under protected life insurance products; flexible payment infrastructures and financial literacy programmes for policyholders exposed to income volatility; preventive ancillary benefits integrated into personal accident insurance products such as check-up, home care, and healthcare packages; awareness-building information and digital content initiatives addressing climate-related health and economic risks; and fund options, including its sustainability fund, that support clean energy and sustainable agriculture and food sectors. As of year-end 2025, revenue generated from SDG-linked products and services amounted to TRY 15,377,604,905.
Exposure to Physical Risk	Probable Maximum Loss (PML) of insured products from weather-related natural catastrophes	Quantitative	Presentation currency	FN-IN-450a.1	AgeSA operates exclusively in the life insurance, personal accident insurance, and private pension businesses. Due to the nature of these business lines, no coverage is provided for insured physical assets, and therefore there is no direct insurance claims risk arising from weather-related natural catastrophes.

					Accordingly, the Probable Maximum Loss (PML) calculation under FN-IN-450a.1 is not applicable to AgeSA's product structure and business activities and has therefore been excluded from the scope of reporting.
	Total monetary losses attributable to insurance payouts from (1) modelled natural catastrophes and (2) unmodelled natural catastrophes, by event type and geographic segment (net and gross of reinsurance)	Quantitative	Presentation currency	FN-IN-450a.2	AgeSA operates exclusively in the life insurance, personal accident insurance, and private pension businesses. Insurance products offered under these business lines do not provide coverage for physical assets that may be directly affected by natural catastrophes. During the reporting period, no insurance payouts attributable to modelled or unmodelled natural catastrophes, disaggregated by event type and geographic segment, were recorded. Therefore, no monetary losses related to such catastrophes are reportable on a net or gross reinsurance basis.
	Description of the approach to incorporating environmental risks into (1) underwriting processes for individual contracts and (2)	Discussion and Analysis	N/A	FN-IN-450a.3	AgeSA operates exclusively in the life insurance, personal accident insurance, and private pension businesses. Due to the nature of these product groups, insurance coverage is not provided for physical assets, and therefore no underwriting practices directly incorporating

	enterprise-level risk management and capital adequacy management				environmental risks exist at the level of individual contracts. Nevertheless, environmental risks are considered holistically within the framework of enterprise-level sustainability and risk management practices. As part of its Risk and Opportunity Inventory study completed in 2025, AgeSA analyzed climate change-related physical and transition risks together with their short-, medium-, and long-term impacts. The results of these analyses are taken into account in long-term strategic planning, product development processes, and capital adequacy assessments. Furthermore, in line with Sabancı Holding's Responsible Investment Policy, environmental risks within the investment portfolio are regularly monitored and managed. In this context, the environmental performance of portfolio companies is assessed, and improvement measures are planned or high-risk assets are excluded from the portfolio where necessary. A gradual divestment strategy from carbon-intensive sectors is being pursued, and investment decisions are shaped in line with
--	--	--	--	--	---

					net zero target. AgeSA addresses environmental risks not directly at the product level, but through a holistic approach encompassing investment management, sustainability strategy, and enterprise risk management processes, while developing practices aimed at mitigating the impacts of these risks.
--	--	--	--	--	--

Operational Metric	2024	2025
Number of policies in force by segment: (1) Personal Accident, (2) Life	(1) Personal Accident: 218,517 (2) Life: 3,183,917	(1) Personal Accident: 206,247 (2) Life: 2,529,890

Comparative Information

Table 2. Comparative Information

Performance Indicator	2024 Performance	2025 Performance
Number of SDG-linked Products	18	18
Number of SDG-linked Services	6	8
Revenue Share from SDG-linked Products and Services (%)	47%	51%
Revenue from SDG-linked Products and Services (TRY)	TRY 8,440,508,383	TRY 15,377,604,905
Assets under Management in the Sustainability Fund (TRY)	TRY 2.6 billion	TRY 1.8 billion
Net Return of the Sustainability Fund (%)	45.83%	19%

Share of Hybrid Vehicles in the Vehicle Fleet	62%	38%
Carbon Emissions Avoided through Reduced Paper Consumption (tCO ₂ e)	766 tCO ₂ e	590 tCO ₂ e
Private Pension Fund Size (TRY billion)	TRY 228 billion	TRY 402 billion
Claims-to-Premium Ratio in Life Insurance	10%	7%