



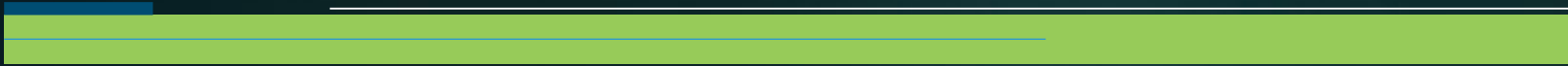
DEVA HOLDİNG A.Ş.
2025 TSRS Compliant Sustainability Report

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ABOUT THE REPORT



About the Report

This report presents the climate-related disclosures of DEVA Holding A.Ş. (referred to as “DEVA” or “the Company” in this report) and covers its activities for the financial period from January 1 to December 31, 2025. The report was prepared in accordance with the Turkish Sustainability Reporting Standards (TSRS) published by the Public Oversight, Accounting, and Auditing Standards Authority (KGK). The disclosures were prepared under the headings of Governance, Strategy, Risk Management, and Metrics and Targets, in line with the reporting principles established by the KGK. Potential financial impacts related to sustainability and climate issues have been assessed within the framework of TSRS 1 “General Provisions on the Disclosure of Sustainability-related Financial Information” and TSRS 2 “Climate-related Disclosures.” The TSRS 2 Sector-Based Implementation Guides have been reviewed, and it has been determined that, given the Company’s field of activity and the nature of its operations, there is no guide that is directly applicable.

The climate-related information included in this report has been presented in a manner that will be useful to users of general purpose financial reports when making decisions regarding the provision of resources to the Company.

As part of this report, DEVA discloses information regarding climate-related risks and opportunities that can reasonably be expected to affect its cash flows, access to financing, and cost of capital in the short, medium, and long term.

The scope of this report has been determined by taking into account the Company’s current areas of operation and its data collection infrastructure. In this regard, Devatis LTD, Devatis GmbH, and Devatis Inc., which are consolidated in DEVA’s financial statements, have been included in the scope of this report.

To ensure consistency and comparability across DEVA’s published reports, the financial disclosures in this report are based on the accounting policies, calculation methods and estimates used in the Company’s 2025 financial reports, with TL used as the reporting currency. The financial and non-financial information presented in this report is relevant, verifiable, timely and faithfully represented.

Assurance

In accordance with the TSRS published by the KGK in the Official Gazette dated December 29, 2023, No. 32414(M), and as part of the mandatory independent audit, DRT Bağımsız Denetim ve Serbest Muhasebeci Mali Müşavirlik A.Ş. (Deloitte) conducted an assurance engagement in accordance with ISAE 3000 “Assurance Engagements Other than Audits or Reviews of Historical Financial Information” and ISAE 3410 “Assurance Engagements on Greenhouse Gas Statements”, and a limited assurance statement is included in the section titled “**Limited Assurance Statement on the TSRS-Compliant Sustainability Report**” of the report.



About the Report

Transitional Exemptions

DEVA benefits from the decision to extend for one year the transitional exemptions granted by the KGK to companies that complied with the TSRS for the first time and prepared sustainability reports during the 2024 reporting period, as published in the Official Gazette dated 30 December 2025 and numbered 33123. The Company is therefore taking into account the transitional exemptions under articles E4, E5 and E6 of TSRS 1, as well as transitional provision 3 of the Board Decision on the Scope of Application of TSRS.

- TSRS 1 E4: “In the first annual reporting period in which an undertaking applies this Standard, it is permitted to report its sustainability-related financial disclosures after publishing its related financial statements. When applying this transitional exemption, the undertaking shall report its sustainability-related financial disclosures,
 - (a) At the same time as the undertaking’s next second-quarter or half-year interim general purpose financial report, if it is required to present such interim financial report.

(b) At the same time as the undertaking’s next second-quarter or half-year interim general purpose financial report, if it voluntarily presents such report, provided that it is within nine months from the end of the first annual reporting period in which this Standard is applied.

(c) If the undertaking is neither required nor chooses voluntarily to present an interim general-purpose financial report, it shall report within nine months from the end of the annual reporting period in which this Standard is applied for the first time.”

- TSRS 1 E5: “In the first annual reporting period in which an undertaking applies this Standard, it is permitted to disclose only information on climate-related risks and opportunities (in accordance with TSRS 2) and, therefore, to apply the provisions of this Standard only to the extent that they relate to the disclosure of information on climate-related risks and opportunities. If the undertaking uses this transitional exemption, it shall disclose that fact.”

- TSRS 1 E6: “If the undertaking uses the transitional exemption in article E5:

(a) In the first annual reporting period in which the undertaking applies this Standard, it is not required to disclose comparative information on climate-related risks and opportunities (see article E3), and
 (b) In the second annual reporting period in which the undertaking applies this Standard, it is not required to disclose comparative information on sustainability-related risks and opportunities other than climate-related risks and opportunities.”

- Transitional Provision 3: “Undertakings are not required to disclose Scope 3 greenhouse gas emissions during the first two reporting periods in which they implement the TSRS within the scope of the regulation.”



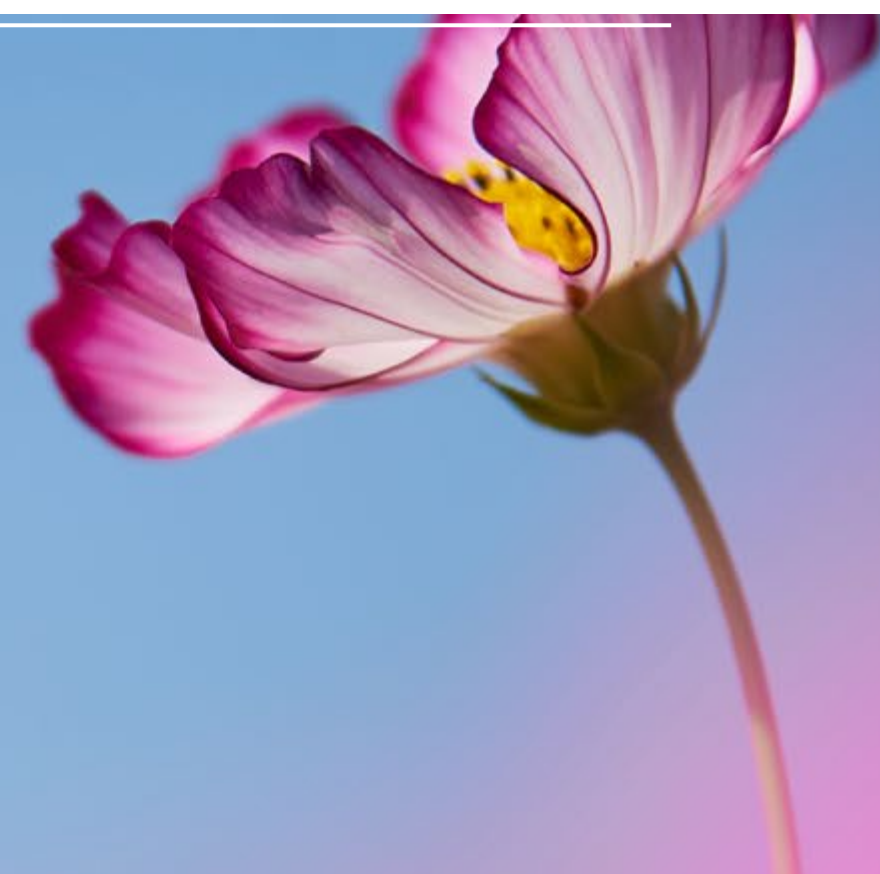
About the Report

Reporting Boundaries and Measurement Approach

The significance of DEVA's climate-related risks and opportunities has been determined based on the potential impacts these risks and opportunities could have on the Company's financial performance and strategy, within the framework of its strategic planning. The quantitative threshold used in this assessment has been defined as 5% of pre-tax net income, in accordance with TFRS, to ensure consistency with the financial audit approach.

During the reporting period, DEVA assessed the impacts of climate-related risks and opportunities on its business model and value chain. Based on quantitative calculations performed using all reasonable and supportable information available as of the reporting date, DEVA provides qualitative disclosures in accordance with TSRS 1, Article 38, and TSRS 2, Article 19, as the projected financial impacts of climate-related risks remain below the financial threshold.

The Company plans to report on the financial impacts of climate-related opportunities to the extent it possesses the skills, capabilities, or resources to provide quantitative information regarding such impacts; during the reporting period, it has included qualitative disclosures regarding the financial impact of these opportunities in accordance with TSRS 2, paragraph 20. However, in the Company's greenhouse gas emissions calculations, affiliated companies have been included in the calculations based on their ownership percentage using the equity share approach..



About the Report

Value Chain

Upstream	Suppliers	Procurement of Raw Materials and Auxiliary Materials (API, Packaging Materials) Selection, Inspection, and Compliance of Suppliers
	Procurement	
	Service Providers	Consultancy and Audit Services
Direct Operations	Manufacturing	Çerkezköy and Kartepe Production Facilities
	R&D	DEVARGE
	Employees	
	Logistics	Product Distribution and Logistics Operations
Downstream	Customers	Promotional Activities Post-Use Pharmaceutical Waste Management
	Subsidiaries	Devatis LTD, Devatis GmbH, Devatis Inc.

ÇERKEZKÖY I
Production Facility



ÇERKEZKÖY II
Production Facility and R&D Center



ÇERKEZKÖY IV
Logistics Center



KARTEPE
Production Facility



ISTANBUL
Headquarters



About the Report

About DEVA

Founded in 1958, DEVA operates in Türkiye’s pharmaceutical sector with a long-standing history and proven manufacturing expertise. The Company manufactures and markets human pharmaceuticals and pharmaceutical raw materials, as well as veterinary medicines, cologne, medical ampoules, and dietary supplements. Its broad and diversified product portfolio, combined with a robust production infrastructure, supports DEVA’s position in the healthcare sector. The Company’s majority shareholder is EastPharma S.a.r.l., based in Luxembourg, which holds an 82.20% stake. DEVA, which is listed on Borsa Istanbul (BIST), conducts its operations in accordance with the principles of transparency and sustainable growth,

consistent with its status as a publicly traded company.

DEVA expands its portfolio with new treatment options every year and currently offers over 675 products across 15 therapeutic areas, including oncology, cardiology, respiratory, and ophthalmology. The production facilities in Çerkezköy and Kartepe provide a critical infrastructure supporting the Company’s growing product diversity, with an annual production capacity of 620 million units.

In pursuit of its goal to contribute to public health and improve access to medicines, R&D activities are a strategic priority, and high-value-added products

are being developed at the DEVARGE R&D Center, which is equipped with advanced technological infrastructure.

All production facilities operate in compliance with EU GMP and US FDA standards. DEVA maintains a strong presence in international markets with a total of 1,863 licensed products across 86 countries and exports pharmaceuticals and pharmaceutical raw materials to more than 60 countries, including the United States, Switzerland, and Germany.

The ownership percentages of DEVA’s subsidiaries included in the financial consolidation are listed below:

Table 1: Subsidiaries Included in Financial Consolidation

Subsidiaries	Location	Share (%)
Devatis LTD	New Zealand	100%
Devatis GmbH	Germany	100%
Devatis Inc.	United States of America	100%



An aerial photograph of a lush green forested island in the middle of a deep blue lake. Sunlight filters through the trees, creating a warm, golden glow. A large white circle is positioned at the top center, partially overlapping the forest. The word "GOVERNANCE" is written in large, white, bold, sans-serif capital letters across the middle of the image, centered over the island. Below the text is a thick green horizontal bar.

GOVERNANCE

Governance

DEVA addresses its sustainability approach within the framework of best practices developed in accordance with company policies and principles that define sustainability and climate-related risks and opportunities. Within the scope of its Sustainability Policy, DEVA assesses sustainability and climate-related risks and opportunities as part of its sustainability governance, in accordance with established core principles and guidelines.

DEVA has established a governance structure for sustainability and climate change to ensure the effective management of risks and opportunities associated with these areas, and has assigned responsibilities for the monitoring, assessment, and management of such risks and opportunities to the relevant bodies and committees.

The bodies and committees responsible for sustainability governance include the Board of Directors, which is primarily responsible for the Company's sustainability management, as well as the Sustainability Subcommittee, the Early Detection of Risk Committee, and the Audit Committee. The Corporate Governance Committee is responsible for establishing the reporting and oversight relationship between the Sustainability Subcommittee and the Board of Directors.

DEVA's Board of Directors, through strategic decisions made in accordance with the Capital Markets Board's Communiqué on Corporate Governance (II-17.1) safeguards the Company's balance of risk, growth, and returns, and manages

and represents the Company in accordance with its long-term interests through a rational approach to risk management.

In this regard, sustainability and climate-related risks and opportunities are addressed within the scope of the responsibilities of the relevant committees; their potential impacts on the Company's strategy, financial planning, and access to capital are also monitored under the supervision of the Board of Directors.



Governance

Board of Directors

The DEVA Board of Directors is composed of members with many years of experience in the pharmaceutical industry. As the Company’s highest decision-making body responsible for sustainability governance, the Board of Directors monitors the Company’s sustainability activities, as well as sustainability and climate-related risks and opportunities, through the Sustainability Subcommittee and the Early Detection of Risk Committee. The Board of Directors monitors and evaluates the activities of the Sustainability Subcommittee through the Corporate Governance Committee, which reports to it.

The identification and assessment of sustainability and climate-related risks and opportunities fall within the scope of the duties and responsibilities

of the Sustainability Subcommittee and the Early Detection of Risk Committee, and the results of these committees’ meetings are presented to the Board of Directors. The Sustainability Subcommittee reports to the Board of Directors at least twice a year; the Early Detection of Risk Committee reports the results of its meetings to the Board of Directors following each meeting or at least twice a year.

In addition, the Audit Committee, which oversees the effectiveness of the Company’s internal control and internal audit mechanisms, collaborates with the Internal Auditing Department and the Early Detection of Risk Committee to implement risk management processes related to sustainability and climate change. The Board of Directors monitors the findings and assessments reached by the Committee through written resolutions and minutes.

As of this reporting period, the DEVA Board of Directors is monitoring sustainability and climate-related risks and opportunities in accordance with the collaboration framework established between the Sustainability Subcommittee and the Early Detection of Risk Committee **working principles.**

In comparison to the previous reporting period, at the Company’s annual General Meeting held on April 14, 2025, elections were held for Board of Directors members whose terms had expired, and new members were appointed to serve for a three-year term. Additionally, following the passing of Sengül Soytaş, who had been elected as an Independent Board Member, Mehmet Baş was appointed to the vacant independent board membership to serve for the remaining term.

Table 2: Board of Directors

Name - Surname	Title
Philipp Daniel Haas	Chairman of the Board and CEO
Tuncay Cem Akkuş	Member of the Board of Directors
Ayşecik Haas	Member of the Board of Directors
Cüneyt Demirgüreş	Independent Member of the Board of Directors
Mehmet Baş	Independent Member of the Board of Directors

Governance

Sustainability Subcommittee

DEVA's Sustainability Subcommittee was established within the Company under the Corporate Governance Committee to define the sustainability strategy in the areas of environmental, social, and corporate governance, and to oversee the implementation of the policies, objectives, and practices developed within this framework.

The Sustainability Subcommittee convenes at least twice a year to assess the Company's sustainability performance and presents the resulting outputs, such as sustainability reports, to the Board of Directors. In parallel, it evaluates sustainability- and climate-related risks and opportunities as part of its collaborative efforts with the Early Detection of Risk Committee and submits these alongside the risk reports prepared by the Early Detection of Risk Committee to the Board of Directors.

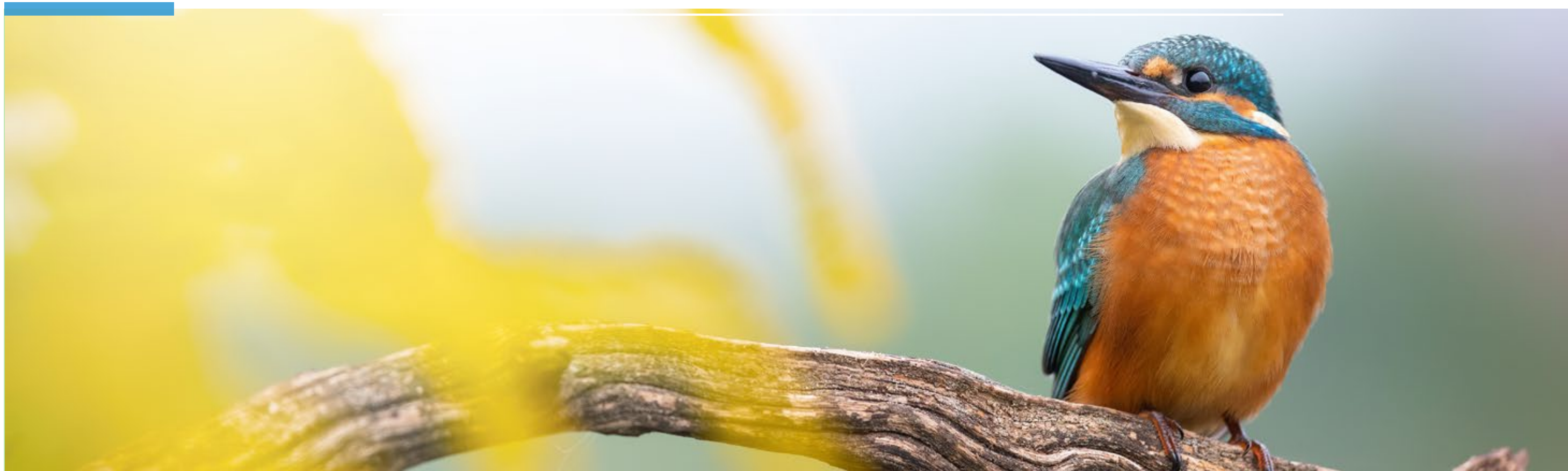
The Sustainability Subcommittee reported twice to the Board of Directors on the activities it carried out in 2025.

The Committee was established with the participation of representatives from key business functions that support the Company's sustainability approach, to ensure that the Company can monitor its sustainability performance as well as sustainability and climate-related risks and opportunities using an approach that takes sector-specific dynamics into account. The Committee is chaired by the Company's CFO, with the Head of Türkiye and International Markets serving as Vice Chair.

The Committee members include: Communications, Investor Relations, Human Resources and Development, Legal, Finance, Occupational Health,

Safety and Environment (HSE), Production, Quality Operations, Licensing, Purchasing, Planning and Logistics, International Markets, Biotechnology, Engineering Projects Coordination, Strategic Planning & Corporate Communications.

The duties and authorities of the Sustainability Subcommittee are defined within the framework of DEVA's **Sustainability Policy and the Committee's working principles**. As of this reporting period, the Sustainability Subcommittee's working principles have been updated to include duties and responsibilities that will ensure the monitoring of sustainability and climate-related risks through a holistic approach integrated with existing risk management.



Governance

Table 3: Sustainability Subcommittee

Name – Surname	Title
Mesut Çetin	Chairman (CFO)
Doğan Varinlioğlu	Vice Chair (Head of Türkiye and International Markets)
Emine Seçil Yüksel	Secretary / Member (Communications)
Gülseren Mahmutoglu	Member (Investor Relations)
Gülcan Gümüş	Member (Human Resources and Development)
Aytaç Aysuna Erden	Member (Legal)
Alper Acındı	Member (Finance)
Sibel Kayaoğlu	Member (Occupational Health, Safety and Environment)
Fatma Yanbasan Turp	Member (Quality Operations)
Gökhan Kaba	Member (Purchasing)
Murat Aksoy	Member (Production Planning & Logistics)
Serkan Varlık	Member (International Markets)
Mert Uz	Member (International Markets)
Şerifenur Taşkiran	Member (Regulatory Affairs)
İrfan Çinkaya	Member (Biotechnology)
Suat Cingiler	Member (Engineering Projects Coordination)
Emre Günaydın	Member (Strategic Planning & Corporate Communications)

During the reporting period, Finance Director Alper Acındı began serving as a member of the Sustainability Subcommittee.

Governance

Early Detection of Risk Committee

The Early Detection of Risk Committee, which operates under the DEVA Board of Directors, is responsible for the early detection of all types of risk, including strategic, operational, financial, legal, sustainability, and climate-related risks that could jeopardize the Company’s existence, growth, and business continuity.

The Early Detection of Risk Committee evaluates the risks it identifies within the scope of its duties and responsibilities, in accordance with the Company’s organizational risk limits. The Committee prioritizes risks that exceed these limits by classifying them low, medium, and high based on their impact and likelihood.

As of the current reporting period, in line with the updates made to the Committee’s working principles, processes related to the identification, monitoring, management, and prioritization of sustainability and climate-related risks and opportunities have been comprehensively addressed. In accordance with these changes, these processes are carried out in collaboration with the Sustainability Subcommittee.

The Early Detection of Risk Committee, which reviews existing risk management systems at least once a year, meets at least six times a year, with meetings held every two months. The decisions made at these meetings are documented, and the findings and assessments obtained within the scope

of the Committee’s duties and responsibilities are reported to the Board of Directors. The Early Detection of Risk Committee, acting under the authority of the Board of Directors, has the authority to assign tasks to the relevant departments of the company, review business processes, and monitor and verify whether the identified actions have been implemented.

In addition, the Committee conducts a situation assessment based on the risk reports prepared following its meetings, evaluates any identified risks and recommended actions, and informs the Board of Directors in writing. The Board of Directors reviews the recommendations of the Early Detection of Risk Committee regarding its decision-making processes and provides the necessary resources and support to ensure the Committee can operate effectively.

Table 4: Early Detection of Risk Committee

Name – Surname	Title
Cüneyt Demirgüreş	Chairman (Independent Board Member)
Mehmet Baş	Member (Independent Board Member)
Tuncay Cem Akkuş	Member (Board Member)

Governance

Audit Committee

At DEVA, the Audit Committee oversees the public disclosure of financial information, the accounting system, independent audits, and the operation and effectiveness of the Company’s internal control and internal audit systems. The Committee works in coordination with the Internal Auditing Department and the Early Detection of Risk Committee to implement risk management processes related to sustainability and climate change.

The effectiveness of risk management and internal control mechanisms at DEVA is assessed through

monitoring and reporting activities conducted by the Internal Auditing Department. The Committee conducts process analyses in collaboration with the Internal Auditing Department to audit risk-focused processes. The Internal Auditing Department monitors risk management processes and conducts audits to ensure that the Company’s operations comply with the principles and relevant policies of the Institute of Internal Auditors, thereby working to control and improve these processes. All departments are evaluated from a risk management perspective, and the audit results are presented to the Audit Committee.

The Audit Committee consists of at least two members selected by the Board of Directors from among its independent members. The Committee meets four times a year, at least once every three months. Decisions made at Committee meetings are documented in writing, and the minutes, signed by the Committee members, are regularly maintained. The Committee presents its findings and assessments, within the scope of its duties and responsibilities, to the Board of Directors.

Table 5: Audit Committee

Name – Surname	Title
Cüneyt Demircü	Chairman (Independent Board Member)
Mehmet Baş	Member (Independent Board Member)



Governance

Competencies and Capacity

DEVA's Board of Directors possesses the expertise to assess the potential impacts of sustainability and climate-related risks and opportunities on the Company, taking into account the industry in which it operates, its business model, value chain, geographic location, and emerging technologies. Information regarding the education and qualifications of Board members is available on the Company's [website](#). Additionally, the committee members responsible for overseeing and monitoring the strategies developed to address these risks and opportunities possess the necessary skills and experience to effectively fulfill their duties:

- Members of the Early Detection of Risk Committee are selected from among the independent members of the Board of Directors and non-executive members of the Board of Directors. It is essential that committee members possess sufficient business experience and industry expertise to effectively identify and assess risks that may arise in the sectors in which the Company operates.
- In determining the chairman of the Audit Committee, preference is given to highly qualified candidates who have held similar positions and possess expertise in the analysis of financial statements and accounting standards. Additionally, at least one member of the Committee is expected to have a minimum of five years of experience in the fields of auditing, accounting, or finance.

DEVA informs its employees about sustainability and climate-related risks and supports the development of competencies in these areas. The Company mandates "Occupational Health, Safety, and

Environment" and "Zero Waste Management" training for employees and managers through the Devakademi platform. Through training conducted within the framework of occupational health, safety, and environmental management systems established in accordance with ISO 14001 and ISO 45001 standards, the goal is to increase employees' knowledge and awareness of relevant topics at all levels. The effectiveness of the policies and training implemented in this context is evaluated through annual Management Review Meetings and OHS Committees. Competency needs and areas for development are identified through these processes.

DEVA fosters internal communication by preparing weekly articles aimed at raising employee awareness about sustainability issues. The content of these articles is determined based on the agenda for the relevant week and primary sustainability topics. Examples of these articles include "August 6: World Clean Air Day" and "Sustainable Living: Easy-to-Implement Methods at Home."

Philipp Daniel Haas, Chairman of the Board and CEO of DEVA, has several years of international experience in the pharmaceutical industry, particularly in the field of generic drugs. With his experience gained in pharmaceutical markets across various countries, particularly in Türkiye and Eastern Europe, he has held senior management positions at leading companies in the industry.

Tuncay Cem Akkuş, a non-executive member of the DEVA Board of Directors, has held positions throughout his career in engineering-based

infrastructure, operations, and process management. He has served in engineering, managerial, and consulting roles for large-scale infrastructure projects at organizations operating across various sectors. He currently serves as a senior executive in the field of technology and systems infrastructure.

Ayşecik Haas, a non-executive board member at DEVA, has a background in engineering and business development and has previously held management positions in the electrical, electronics, and consumer products sectors.

Cüneyt Demirgüreş, an independent member of the DEVA Board of Directors, has held senior executive positions at financial institutions throughout his career. Demirgüreş also serves as a senior lecturer at Koç University.

Prof. Dr. Mehmet Baş, an Independent Board Member of DEVA, holds bachelor's, master's, and PhD degrees in business administration. Prof. Dr. Baş, who continues his academic career in the Department of Business at the Faculty of Economics and Administrative Sciences at Ankara Hacı Bayram Veli University, continues to make scientific contributions through his publications in international peer-reviewed journals.

Governance

Remuneration Processes

DEVA's remuneration processes are managed by the Corporate Governance Committee. Fixed remuneration (attendance fees) to be paid to members of the Board of Directors is addressed under the Company's Remuneration Policy and is determined in accordance with shareholder proposals at General Meeting sessions. The remuneration of senior executives, on the other hand, consists of fixed and performance-based components.

In this reporting period, as in the previous one, DEVA continues its infrastructure efforts to integrate key sustainability and climate-related performance indicators into its performance evaluation processes. In this regard, the Company plans to link the remuneration and bonus systems of senior executives to the efficient use of resources such as water and energy, occupational health and safety performance, employee development, operational excellence, digital transformation, and sustainable

governance practices, in line with its sustainability vision and mission. Once the targets established under these headings are implemented in the next reporting period, the results of performance evaluations, which are weighted based on relevant performance indicators, will influence the remuneration and bonuses of senior executives.





STRATEGY

Strategy

As part of the work it carried out during the reporting period, DEVA assesses the anticipated impacts of climate-related risks and opportunities on its business model and the entire value chain. Under the “Strategy” section, the report includes scenario analyses, the risks and opportunities addressed in this context, and their relationship to the Company’s financial performance, strategy, and climate resilience.

The Company presents these assessments in accordance with international standards within a short-, medium-, and long-term framework; accordingly, it monitors climate-related risks and opportunities in alignment with the previous reporting period, using timeframes of 0-1 year, 1-5 years, and over 5 years.

As a result of the work carried out, the impacts of the opportunity presented by advanced water management practices, which emerged in the context of water stress risks and the actions taken to mitigate these risks, on DEVA’s financial position, strategy, and climate resilience were assessed.

Table 6: Timeframes

Timeframes	Explanation
Short-term	0-1 year
Medium-term	1-5 years
Long-term	5 years and more

Scenario Analyses

DEVA has employed scenario analyses to demonstrate climate resilience within the timeframes it has identified by assessing the potential impacts of climate-related risks and opportunities on its business model and entire value chain. In addition to the RCP scenario analyses aligned with the IPCC Sixth Assessment Report, the Company has included SSP scenarios and the International Energy Agency’s NZE and STEPS scenarios in its assessments, consistent with the previous reporting period.

In addition to the RCP2.6 and RCP8.5 scenarios, SSP scenarios address climate change within the framework of socioeconomic developments such as population, economic growth, technology,

governance, inequalities, and resource use, thereby contributing to the assessment of sustainability and climate-related risks and opportunities.

The IEA’s NZE and STEPS scenarios, meanwhile, support this framework in terms of energy system transformation, policy outlook, access to technology, and market conditions. In this context, sustainability and climate-related risks and opportunities are assessed by considering the social, economic, and sectoral conditions in which potential impacts may emerge.

Through this approach, DEVA addresses climate-related risks and opportunities, as well as their potential impacts, across the entire value chain

using various consistent and mutually reinforcing methodologies within the framework of the RCP, the SSP, and IEA scenarios, which take into account socio-economic developments, temperature increase projections, and assumptions regarding energy policies. This enables a comprehensive assessment of the Company’s climate resilience in the short, medium, and long term.

Strategy

Table 7: Scenario Analyses

Scenario Analyses	Explanation
RCP2.6	This scenario is evaluated in line with the Paris Agreement’s goals, which aim to limit global temperature rise to well below 2°C above pre-industrial levels by the year 2100.
RCP8.5	This is a scenario that projects global temperature increases of up to 4°C by the year 2100.
SSP1	SSP1 scenario represents a future in which sustainable development is prioritized, climate policies are strengthened, international cooperation increases, and the low-carbon transition accelerates. In this scenario, it is assumed that the scope and impact of sustainability expectations, including environmental regulations, transparency, and the supply chain, will increase.
SSP5	SSP5 scenario represents a future in which economic growth and fossil fuel use are prioritized, and competition and geopolitical tensions are on the rise. In this scenario, while climate policies across countries and sectors proceed at different paces and with varying scopes, it is assumed that the likelihood and impact of high emissions and physical climate risks will increase.
IEA NZE	This is the scenario predicted by the International Energy Agency, which aims to limit global temperature rise to 1.5°C by achieving net-zero emissions by 2050.
IEA STEPS	This is a scenario developed by the International Energy Agency that outlines how the global energy system and emissions might evolve, based on countries’ current and officially announced energy and climate policies.

Strategy

Climate-related Risks and Opportunities

DEVA assessed its climate-related risks and opportunities using a comprehensive inventory of risks and opportunities categorized as physical and transition risks. The risk and opportunity categories were tracked within a framework compliant with IFRS¹. Accordingly:

- Physical risks encompass both the sudden, event-driven impacts caused by climate change and the risks arising from long-term changes in climate conditions. Acute physical risks refer to those that arise in response to specific events, while chronic physical risks refer to those that are likely to affect companies over extended periods of time.

¹ The TCFD completed its mandate and ceased operations in 2023. The FSB announced that the task of monitoring progress in companies' climate-related disclosures has been taken over by the IFRS Foundation.

- Transition risk refers to the policy, legal, technological, market, and reputational risks that arise during the transition to a low-carbon economy and could have potential financial implications for companies.

- Climate-related opportunities are defined as the potential positive impacts that may arise for companies as part of their efforts to mitigate and adapt to climate change.

DEVA assessed climate-related risks and opportunities within the framework of IFRS, evaluating their potential impact on the Company's financial planning, climate resilience, and current

and planned strategies in light of physical, economic, technological, regulatory, and reputational dynamics. As a result of this study, the risk of water stress and the opportunities presented by advanced water management practices were identified as key priorities.

The methods and activities used to prioritize and assess climate-related risks and opportunities are detailed in the **Risk Management** section of the report.



Strategy

Risks and Opportunities Related to Water Stress

As part of its ongoing efforts, DEVA conducted qualitative assessments of climate-related risks and opportunities and, consistent with the previous reporting period, prioritized water stress as a high-priority risk. The Company analyzed the potential impacts of the water stress risk it identified through scenario analyses on its operational processes using quantitative assessments.

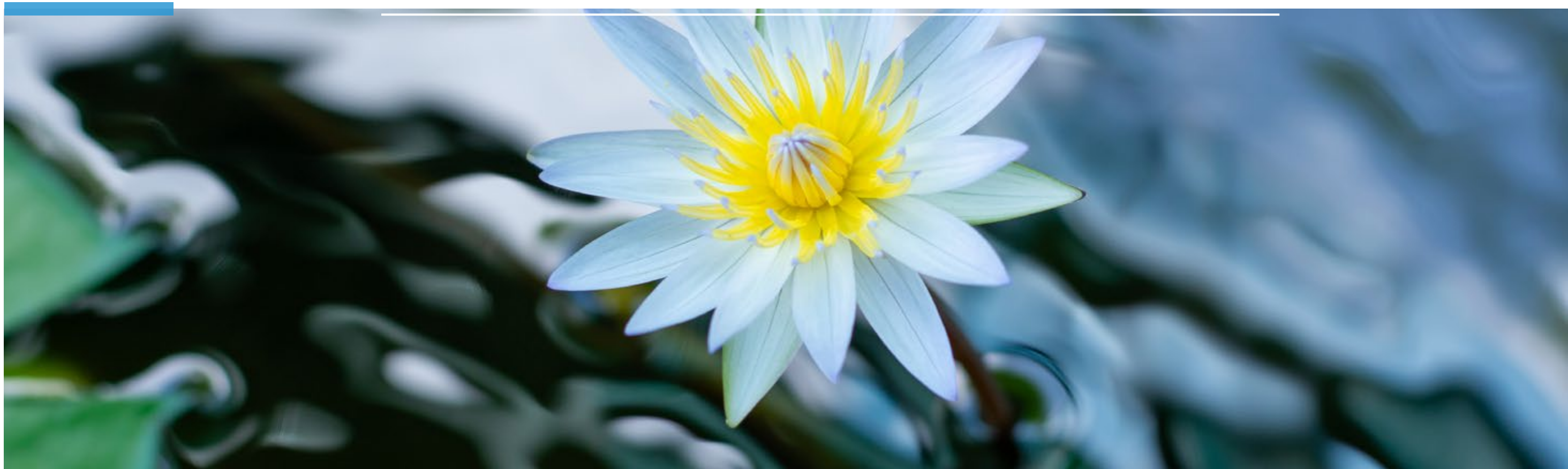
The financial impact of the risk was assessed using methods consistent with those outlined in the 2024 TSRS Compliant Sustainability Report. The analysis was based on the scenario where DEVA is unable to access water, and the potential financial impacts on production activities were calculated using variables such as monthly water consumption, unit sales price, unit water price, and monthly production volume. To measure the financial impact of water stress on

operational processes, water access projections for the Company's production facilities in Çerkezköy and Kartepe were analyzed using the WRI - Aqueduct Water Stress Atlas database.

In addition, it has been assumed that potential constraints on water access could lead to a reduction in water supply and result in additional water costs due to regulatory measures. Accordingly, NiGEM-based macroeconomic trends were taken into account when assessing the short-, medium-, and long-term financial impacts of potential additional water costs; to reduce measurement uncertainty, medium- and long-term projections were analyzed using the exchange rate inflation rate rather than the consumer price index.

In line with measures developed to address the potential impacts of water stress, DEVA implements water conservation and leak prevention initiatives through waste steam recovery projects, the

overhaul of water-cooling systems, the use of sensor-equipped and aerator-fitted faucets, and on-site inspections. In this context, advanced water management practices aimed at reducing water withdrawal and consumption, improving process water efficiency, and increasing reuse rates stand out as a climate-related opportunity area that supports the Company's direct adaptation efforts to climate change and its strategic approach in this field. However, since the effects of advanced water management practices may arise in conjunction with initiatives such as equipment or operational process improvements and resource efficiency, the current or expected financial impacts of these practices cannot be identified separately.



Strategy

Table 8: Risk Table

Risk Information	
Type of Risk	Description of Risk
Physical Risk	Chronic Physical Risk – Water Stress
Definition of Risk	
The decrease in water resources and the spread of prolonged droughts due to climate change restrict access to clean water used in production processes.	
Type of Effect	Timeframe of the Risk
Expected	Medium–Long Term
Affected Value Chain	Country/Region Where the Risk Occurred
Direct Operations	Çerkezköy (Tekirdağ, Türkiye) Kartepe (Kocaeli, Türkiye)
Anticipated Financial Impact	Constraints or interruptions in water supply due to declining water availability and regulatory developments may disrupt production plans and reduce capacity utilization rates, potentially affecting sales and increasing the risk of revenue loss.
Impact on Financial Position, Financial Performance and Cash Flows	Scenarios referencing NiGEM and WRI Aqueduct sources were used to calculate the anticipated financial impact. It has been assessed that the financial impact of water stress risk on the Company’s financial position, financial performance and cash flows is not expected to create a significant effect exceeding 5% of profit before tax in the short, medium and long term.
Actions Taken	The Company carries out practices to reduce the potential impacts that may arise from water stress risk. Within this scope, waste steam recovery projects, revision of water-cooling systems, use of sensor- and aerator-equipped faucets, field controls for water saving and leak prevention activities are carried out. These practices support the Company’s efforts to improve water efficiency.
Impact on Strategy and Decision-Making Processes	Within the scope of the impact of water stress risk on strategy and decision-making processes, climate-focused performance indicators are included in decision-making mechanisms and in the targets of the HSE unit. Regular monitoring of metrics such as water efficiency, water recovery and water consumption per unit of production enables the Company to identify water-related risks at an early stage and determine investment priorities more effectively. The Company plans to implement its sustainability strategy, including short-, medium- and long-term targets, in the next reporting period.

Strategy

Table 9: Opportunity Table

Opportunity Information	
Definition of Opportunity	
Increasing drought risk, infrastructure inadequacies and fluctuations in regional water supply may create a critical risk for production continuity due to potential water interruptions. In this context, DEVA gains the opportunity to enhance its operational resilience through practices that strengthen water management, increase reuse capacity and improve process efficiency.	
Type of Effect	Time Horizon of Opportunity
Expected	Medium–Long Term
Affected Value Chain	Country/Region Where the Opportunity Occurs
Direct Operations	Çerkezköy (Tekirdağ, Türkiye) Kartepe (Kocaeli, Türkiye)
Anticipated Financial Impact	Water efficiency practices are expected to create a positive financial impact by reducing water cost per unit of production through cost optimization, while also creating a positive financial impact through cost optimization by reducing water costs per unit of production, while also supporting revenue protection by keeping operational expenses under control.
Impact on Financial Position, Financial Performance and Cash Flows	The potential financial impact of the opportunity is linked to operational process improvements, increased resource efficiency, and equipment investments or modernization. DEVA provides qualitative information on the potential impact of the opportunity on its financial position, financial performance and cash flows by using an approach proportionate to its skills, capabilities and resources, due to the uncertainties related to future financial revenue potential.
Actions Taken	Project designs that may be implemented in the future to improve energy and resource use, new equipment investments, system improvements, capital expenditure investments and practices aimed at increasing operational efficiency are being evaluated.
Impact on Strategy and Decision-Making Processes	DEVA continues its existing water efficiency efforts by considering them from a strategic perspective that may affect its business model and value chain, and positions practices that increase investment and operational efficiency among the priority targets of the HSE department, which supports sustainability performance. In this way, the evaluation of investment decisions, water efficiency and alternative water use criteria contributes to the more predictable management of operational costs.

Strategy

Financial Position, Financial Performance and Cash Flows

Within the scope of its efforts during the reporting period, DEVA analyzed the potential impact of water stress, identified as a climate-related risk, and the advanced water management practices resulting from actions taken to mitigate this risk on financial position, performance, and cash flows. Based on the assessments conducted, it was determined that the short-, medium-, and long-term effects of water stress risk on operational processes and water costs remained below 5% of pre-tax net income, which was used as the financial threshold. Furthermore, assessments based on different projections in the calculation of financial impact increase the level of measurement uncertainty regarding the estimation of that impact. For this reason, the Company provides qualitative disclosures regarding the effects of this risk on its financial position, performance, and cash flows. In this context, no significant changes are anticipated in the carrying amounts of the Company's assets and liabilities, as well as in its short-, medium-, and long-term cash flows based on estimated calculations, depending on the risk.

It has been determined that the potential financial impact of the opportunity presented by advanced water management practices cannot be calculated separately for each component, as it is linked to variables such as operational process improvements, resource efficiency, and the purchase or upgrading of new equipment. Consequently, DEVA provides qualitative information regarding the impact of this opportunity on financial position, financial performance, and cash flows.

DEVA's current water management practices include new project designs, equipment purchases, system improvements, capital expenditures, and initiatives that support operational efficiency in the coming periods.

Strategy and Decision-Making

As part of its assessment of risks and opportunities that could potentially impact the DEVA business model and value chain, the company continues its current water efficiency initiatives and includes the evaluation of practices that support investment and operational efficiency among the objectives of the HSE department, which plays a key role in enhancing sustainability performance.

In addition, efforts to incorporate climate-related targets into performance indicators help integrate climate-related issues into decision-making processes, alongside the associated risks and opportunities.

As of the DEVA reporting period, the Company has launched efforts to develop a sustainability strategy that will include short-, medium-, and long-term metrics and targets. It is anticipated that these initiatives will be implemented during the next reporting period, taking into account industry trends and the Company's specific practices. The aim is to support the Company's strategic priorities, including combating climate change, emissions management, and water and wastewater management, as well as its long-term value creation and climate resilience.

Climate Resilience

In its assessments conducted as of the reporting period, DEVA has assessed the water stress risk, which may affect the Company's operational processes, cost structure and business continuity, together with opportunity areas such as advanced water management practices. The analyses indicate that these risks and opportunities do not constitute a level of vulnerability that could be considered significant, either currently or in the future.

In addition, in line with the actions developed to address the potential impacts of water stress, the Company's current water management practices support the opportunities identified in relation to climate change. As part of energy and resource management, the HSE unit's objectives for the upcoming reporting period include regularly monitoring electricity, natural gas, and water consumption; designing new projects to improve existing processes and systems; and overseeing equipment procurement and supply chain processes. This reflects the Company's assessments regarding its direct and indirect adaptation efforts in future periods. Additionally, as part of the energy management system established in 2023 to improve energy efficiency at its production facilities, the Company continues to maintain the effectiveness of its ISO 50001 Energy Management System.



RISK MANAGEMENT

Risk Management

Risk Management Approach

DEVA evaluates the processes of identifying, assessing, prioritizing, and monitoring climate-related risks and opportunities in a manner that is integrated with its current risk management framework. The Company evaluates sustainability and climate-related risks and opportunities within the framework of its Sustainability Policy and ensures the sustainability of its operations by taking into account physical and transition risks related to climate change.

Current risk management processes are updated at least once a year by the Early Detection of Risk Committee. Risks identified by the committee are assessed and monitored within the framework of the Company's corporate risk limits. The results of committee meetings, which highlight potential risks and propose solutions, are reported to the Board of Directors.

In line with the updates made during this reporting period, sustainability and climate-related risks and opportunities are being managed under the coordination of the Sustainability Subcommittee and the Early Detection of Risk Committee.

Information regarding the committees' responsibilities concerning sustainability and climate-related risks and opportunities, as well as the reporting frequency to the Board of Directors, which serves as the Company's strategic decision-making body on these matters, is provided under the **Governance** section of the report.

Identification and Assessment of Climate-Related Risks and Opportunities

DEVA has identified and assessed climate-related risks and opportunities using a comprehensive inventory of risks and opportunities, taking into account the Company's business model, financials, and strategy.

In this regard, the Company organized a risk and opportunity workshop with the participation of various departments. The participating departments include R&D and Clinical Development, Finance, Investor Relations, Internal Audit, Human Resources, Training and Development, Communications, Strategic Planning & Corporate Communications, Occupational Health, Safety, and Environment, Support Services, Information Technology, Purchasing, and Production Planning & Logistics. Through the involvement of various business functions, sustainability and climate-related risks and opportunities were assessed, taking into account their potential impact on the Company's operations, financial performance, and strategic objectives. In this inventory, the Company also examined its sustainability-related risks and opportunities with the aim of establishing a foundation for future reporting periods. However, in accordance with transitional exemptions, information regarding these risks and opportunities is not provided.

Prioritizing Climate-related Risks and Opportunities

The impacts of sustainability and climate-related risks and opportunities on DEVA's business model, strategy, and value chain were analyzed by evaluating the impact-probability dimensions using a 5x5 matrix. In the scoring of risks and opportunities, scores of 8 or below were classified as low priority, 8-12 as medium priority, and 12 or above as high priority. These thresholds were determined by considering the Company's strategic priorities and the historical occurrence of risks and opportunities or their assessment within the industry.

The Company's climate-related risks and opportunities were examined in accordance with the defined time horizons and within the framework of scenario analyses. In addition to the IPCC RCP2.6 and RCP8.5 scenario analyses used in the previous reporting period, this assessment incorporated the IEA's NZE and STEPS scenarios, which include current global energy and policy projections. In addition, the SSP1 and SSP5 scenarios based on the SSP framework were considered. This approach supports the consideration of assumptions regarding energy transition, carbon pricing mechanisms, regulatory developments, and physical climate impacts within a current framework, alongside sustainability risks and opportunities. Detailed information on the scenario analyses and timeframes used in the process of prioritizing climate-related risks and opportunities is provided in the **Strategy** section of the report.

Risk Management

Table 10: Assessed Climate-related Risks and Opportunities

Category	Climate-Related Risks and Opportunities	Upstream	Direct Operations	Downstream
Risks	Water stress		✓	
	Increase in average air temperatures		✓	
	Extreme weather events		✓	
	Carbon pricing mechanisms			✓
	Environmental compliance and continuity through the supply chain	✓		
Opportunities	Public support and incentives for low-carbon production investments		✓	✓
	Advanced water management practices		✓	
	Increasing healthcare needs and access to medicine due to climate change			✓



Risk Management

Table 11: Risk Assessment Criteria

RISK		
Scoring Factor	Scale	Definition
Likelihood	5	The event has already occurred, and/or it is almost certain that the risk will occur within a specific time frame.
	4	The event has occurred multiple times in the past and/or the risk is reasonably expected to occur within a specific time frame.
	3	The event has rarely been observed in the past and/or has a moderate probability of occurring within a specific time frame.
	2	The event has limited or no history of occurrence and/or is unlikely to occur within a specific time frame.
	1	The event has not occurred in the past and/or is highly unlikely or almost impossible to occur within a specific time frame.
Impact	5	The risk has a very high level of impact on the Company’s business model and strategy.
	4	The risk has a high level of impact on the Company’s business model and strategy.
	3	The risk has a moderate impact on the Company’s business model and strategy.
	2	The risk has a low level of impact on the Company’s business model and strategy.
	1	The risk has a very low level of impact on the Company’s business model and strategy.
Risk Materiality	High	For 12 and above, the impact of risk on the business model and value chain is high.
	Medium	The impact of risk on the business model and value chain is moderate for 8 to 12.
	Low	For 8 and below, the impact of risk on the business model and value chain is low.

Table 12: Opportunity Assessment Criteria

OPPORTUNITY		
Scoring Factor	Scale	Definition
Likelihood	5	The opportunity has been realized in a specific context in the past and/or it is almost certain to be realized within a specific time frame.
	4	The opportunity has been realized multiple times in the past and/or it is highly likely to be realized within a specific time frame.
	3	The opportunity has rarely been observed in the past and/or has a moderate probability of being realized.
	2	The opportunity has limited or no history of realization and/or has a low probability of being realized.
	1	The opportunity has not been realized in the past and/or has a very low probability of being realized or is almost impossible to realize.
Impact	5	The opportunity has a very high level of potential impact on the Company’s business model and strategy.
	4	The opportunity has a high level of potential impact on the Company’s business model and strategy.
	3	The opportunity has a moderate level of potential impact on the Company’s business model and strategy.
	2	The opportunity has a low level of potential impact on the Company’s business model and strategy.
	1	The opportunity has a very low level of potential impact on the Company’s business model and strategy.
Opportunity Materiality	High	For 12 and above, the impact of the opportunity on the business model and value chain is high.
	Medium	For scores between 8 and 12, the impact of the opportunity on the business model and value chain is moderate.
	Low	For 8 and below, the impact of the opportunity on the business model and value chain is low.



METRICS AND TARGETS

Metrics and Targets

Climate-related Metrics

As for the reporting period, DEVA presents its reasonable, verifiable, and substantiated information regarding climate-related metrics alongside comparable data and forward-looking action plans. Due to the fact that the Company’s operational structure does not fully align with the existing definitions of the sector classifications covered under TSRS 2, the sector-based implementation guidance provided in TSRS 2 or sectoral metric frameworks outside TSRS were not used in the reporting process.

The water stress risk, identified as having a high priority level as part of the climate risk assessment conducted by DEVA, is addressed through calculations performed within the framework of scenario analyses to assess its potential impacts on the Company’s operational continuity and financial performance.

Within this scope, the model analysis developed to assess the financial impact of the risk uses metrics based on potential revenue loss arising from possible disruptions in production processes and increases in water costs. In addition, the ratio of water demand to water supply, annual total water consumption (megaliters/year), the unit price of municipal water, and the assumed rate of increase in water prices due to rising water stress levels, determined in line with Aqueduct Water Stress Atlas data, are considered as key indicators.

In assessing the risk of climate-related water stress, DEVA analyzes production processes, relevant equipment, and the characteristics of production outputs within the framework of scenario analyses, adopting a comprehensive approach that covers the short, medium, and long term. Based on the

modeling conducted to assess the potential impacts of water stress and in light of current information, no vulnerable asset has been identified. In this regard, the Company’s current operational capacity, technical capabilities, and resources are being evaluated through qualitative analyses.

The scenario analyses, calculation framework and qualitative analyses included in the modelling are presented in the **Strategy** section of the report.

DEVA discloses the metrics used to calculate the financial impacts of risks within the scope of climate-related metrics, as well as greenhouse gas emission metrics, for this reporting period. DEVA does not currently use, nor does it plan to use, carbon credits during or beyond the reporting period to offset greenhouse gas emissions for the purpose of achieving any net greenhouse gas emissions target. In addition, as the Company does not have an existing internal carbon pricing practice, no disclosure is provided regarding internal carbon pricing.



Metrics and Targets

Greenhouse Gas Emissions

DEVA calculates and reports its greenhouse gas emissions in accordance with the GHG Protocol Corporate Accounting and Reporting Standard. Emission calculations are carried out using the equity share approach and also include subsidiaries that are included in the financial consolidation.

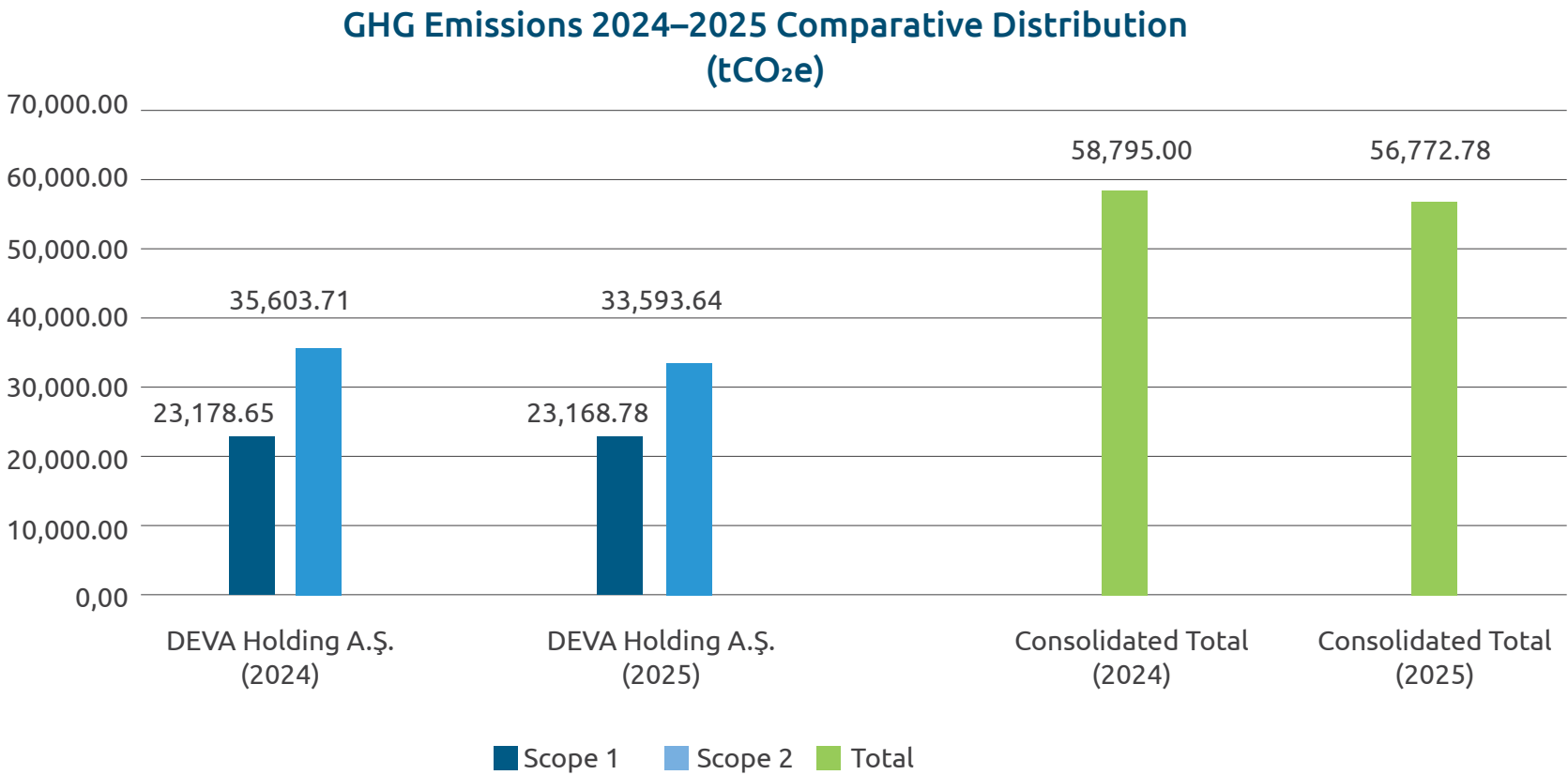
Emissions calculations take into account CO₂, CH₄, N₂O, and HFC gases, and the CO₂ equivalents of these gases are calculated using the IPCC 6th Assessment Report and local global warming potential factors. The greenhouse gas emissions metrics include Scope 1 emissions resulting from the consumption of natural gas, diesel, and gasoline, as well as emissions from fire suppression systems and refrigeration equipment. For the calculation of Scope 2 emissions,

electricity consumption data from the Company’s operations was used.

As DEVA did not have any renewable energy certificates or contractual energy procurement agreements for its energy supply during the reporting period, Scope 2 emissions were calculated using the location-based approach.

For DEVA Holding A.Ş., Scope 1 greenhouse gas emissions stood at 23,178.65 tCO₂e in 2024 and decreased to 23,168.78 tCO₂e in 2025, representing a 0.04% decrease. During the same period, Scope 2 emissions decreased from 35,603.71 tCO₂e to 33,593.64 tCO₂e, representing a 5.65% decline. For subsidiaries, Scope 1 emissions decreased by 16.62%

from 10.35 tCO₂e in 2024 to 8.63 tCO₂e in 2025. Similarly, Scope 2 emissions also decreased from 2.29 tCO₂e to 1.73 tCO₂e, representing a 24.45% decline. In light of these developments, total greenhouse gas emissions, which was 58,795.00 tCO₂e in 2024, fell to 56,772.78 tCO₂e in 2025, representing a 3.44% decrease. While the decrease in Scope 1 emissions is attributed to a reduction in stationary combustion emissions resulting from lower natural gas consumption, the decrease in Scope 2 emissions is linked to lower consumption during the reporting period.



Metrics and Targets

Climate-related Targets

DEVA has adopted a management approach aimed at reducing its environmental impact and continuously improving its climate-related performance under the ISO 14001 Environmental Management System and the ISO 50001 Energy Management System. In this regard, the Company is integrating climate-related targets into executive performance metrics. The performance targets related to remuneration are included under the “Governance” section of the report. In setting these targets, Türkiye, as a party to the Paris Agreement, plays a key role through its Nationally Determined Contribution submitted	under the United Nations Framework Convention on Climate Change, which outlines its 2053 emissions targets. The Company aims to reduce greenhouse gas emissions, improve energy efficiency, and promote the use of renewable energy. In line with this approach, the key components of the Company’s climate and environment-focused strategy include enhancing waste management, ensuring the sustainability of recycling and zero-waste initiatives, developing environmental awareness and education	programs, and regularly monitoring and transparently reporting emissions. DEVA plans to conduct studies aimed at defining short-, medium-, and long-term goals for future periods to strengthen the connection between climate-related risks and opportunities and the Company’s strategy, as well as to reinforce its sustainability vision.
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DEVA has set targets for this reporting period that will be effective in the coming period for the HSE unit, which plays an important role in supporting its sustainability performance. Within this scope, the defined targets include:

- Carrying out at least “1” project for the calculation, monitoring and reduction of the carbon footprint to protect the environment and natural resources,
- Developing practices to improve energy efficiency, improving existing processes and systems, designing new projects, and making energy-efficient choices in equipment purchases and procurement processes in order to regularly monitor and control consumption such as electricity, natural gas and water within the scope of energy and resource use,
- The continuous improvement of environmental and energy management performance by reviewing company policies and utilizing relevant management systems.
- Minimizing waste to the lowest possible level for a sustainable environment, supporting recycling, and using energy and natural resources efficiently,
- Organizing training activities to raise the awareness of employees and stakeholders regarding the environment, occupational health and safety, and energy, and to foster a sense of individual responsibility,
- Assessing environmental impacts, managing potential risks under control and using appropriate technologies to minimize risks.



APPENDICES

Appendices

Events After the Reporting Period

Geopolitical developments in nearby regions may create uncertainty over global economic conditions. As of the reporting date, these developments have no impact on the Company's operations, financial position, cash flows, or going concern; however, their potential effects are closely monitored and evaluated by management.



Appendices

Glossary

BIST	:	Borsa Istanbul
CO₂	:	Carbon Dioxide
CH₄	:	Methane
HFC	:	Hydrofluorocarbons
EU	:	European Union
GMP	:	Good Manufacturing Practices
HSE	:	Health, Safety and Environment
IEA	:	International Energy Agency
IFRS	:	International Financial Reporting Standards
IPCC	:	Intergovernmental Panel on Climate Change
ISO	:	International Organization for Standardization
OHS	:	Occupational Health and Safety
KGK	:	Public Oversight Accounting and Auditing Standards Authority
NiGEM	:	National Institute Global Econometric Model
NZE	:	Net Zero Emissions
N₂O	:	Nitrous Oxide
RCP	:	Representative Concentration Pathways
SSP	:	Shared Socioeconomic Pathways
SPK	:	Capital Markets Board of Turkey
STEPS	:	Stated Policies Scenario
TFRS	:	Turkish Financial Reporting Standards
TL	:	Turkish lira
TSRS	:	Turkish Sustainability Reporting Standards
tCO₂e	:	Tonnes of Carbon Dioxide Equivalent
WRI	:	World Resources Institute



Appendices

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DEVA HOLDİNG A.Ş. ve BAĞLI ORTAKLIKLARININ TÜRKİYE SÜRDÜRÜLEBİLİRLİK RAPORLAMA STANDARTLARI KAPSAMINDA SUNULAN BİLGİLER HAKKINDA BAĞIMSIZ DENETÇİNİN SINIRLI GÜVENCE RAPORU

Deva Holding A.Ş. Genel Kurulu'na,

Deva Holding A.Ş. ve bağlı ortaklıklarının ("Grup") 31 Aralık 2025 tarihinde sona eren yıla ait, Türkiye Sürdürülebilirlik Raporlama Standartları 1 "Sürdürülebilirlikle İlgili Finansal Bilgilerin Açıklanmasına İlişkin Genel Hükümler" ve Türkiye Sürdürülebilirlik Raporlama Standartları 2 "İklimle İlgili Açıklamalar"a uygun olarak sunulan bilgiler ("Sürdürülebilirlik Bilgileri") hakkında sınırlı güvence denetimini üstlendik.

Güvence denetimimiz, Sürdürülebilirlik Bilgileri ile ilişkilendirilen diğer bilgileri (herhangi bir resim, ses dosyası, internet sitesi bağlantısındaki doküman veya yerleştirilen videolar dâhil) kapsamaz.

Sınırlı Güvence Sonucu

"Güvence sonucuna dayanak olarak yaptığımız çalışmanın özeti" başlığı altında açıklanan şekilde gerçekleştirdiğimiz prosedürlere ve elde ettiğimiz kanıtlara dayanarak, Grup'un 31 Aralık 2025 tarihinde sona eren yıla ait Sürdürülebilirlik Bilgileri'nin, tüm önemli yönleriyle Kamu Gözetimi Muhasebe ve Denetim Standartları Kurumu ("KGK") tarafından 29 Aralık 2023 tarihli ve 32414(M) sayılı Resmi Gazete'de yayımlanan Türkiye Sürdürülebilirlik Raporlama Standartları ("TSRS")'na göre hazırlanmadığı kanaatine varmamıza sebep olan herhangi bir husus dikkatimizi çekmemiştir.

Sürdürülebilirlik Bilgileri ile ilişkilendirilmiş diğer herhangi bir bilgi (herhangi bir resim, ses dosyası, internet sitesi bağlantısındaki doküman veya yerleştirilen veya yerleşik videolar dâhil) hakkında bir güvence sonucu açıklamamaktayız.

Sürdürülebilirlik Bilgilerinin Hazırlanmasında Yapısal Kısıtlamalar

Sürdürülebilirlik Bilgileri, bilimsel ve ekonomik bilgi eksikliklerinden kaynaklanan yapısal belirsizliklere maruz kalmaktadır. Sera gazı emisyonlarının hesaplanmasında bilimsel bilginin yetersizliği belirsizliğe yol açmaktadır. Ayrıca, gelecekteki muhtemel fiziksel ve geçiş dönemi iklim risklerinin olasılığı, zamanlaması ve etkilerine ilişkin veri eksikliği nedeniyle, Sürdürülebilirlik Bilgileri iklimle ilgili senaryolara dayalı belirsizlikler içermektedir.

Deloitte, Deloitte Touche Tohmatsu Limited ("DTTL"), onun küresel üye firma ağı ve ilgili kuruluşlarından bir veya daha fazlasını ifade eder. DTTL üye firmalarının her biri yasal olarak ayrı ve bağımsız kuruluşlardır. DTTL müşterilere hizmet sunmamaktadır. Daha fazla bilgi almak için www.deloitte.com/about adresini ziyaret ediniz.
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Yönetimin ve Üst Yönetimden Sorumlu Olanların Sürdürülebilirlik Bilgileri'ne İlişkin Sorumlulukları

Grup Yönetimi aşağıdakilerden sorumludur:

- Sürdürülebilirlik Bilgileri'nin Türkiye Sürdürülebilirlik Raporlama Standartları esaslarına uygun olarak hazırlanması;
- Hata veya hile kaynaklı önemli yanlışlıklar içermeyen Sürdürülebilirlik Bilgilerinin hazırlanmasıyla ilgili iç kontrolün tasarlanması, uygulanması ve sürdürülmesi;
- İlaveten Grup Yönetimi uygun sürdürülebilirlik raporlama yöntemlerinin seçimi ve uygulanması ile koşullara uygun makul varsayımlar ve tahminler yapılmasından da sorumludur.

Üst yönetimden sorumlu olanlar, Grup'un sürdürülebilirlik raporlama sürecinin gözetiminden sorumludur.

Bağımsız Denetçinin Sürdürülebilirlik Bilgilerinin Sınırlı Güvence Denetimine İlişkin Sorumlulukları

Aşağıdaki hususlardan sorumluyuz:

- Sürdürülebilirlik Bilgileri'nin hata veya hile kaynaklı önemli yanlışlıklar içerip içermediği hakkında sınırlı bir güvence elde etmek için güvence çalışmasını planlamak ve yürütmek;
- Elde ettiğimiz kanıtlara ve uyguladığımız prosedürlere dayanarak bağımsız bir sonuca ulaşmak ve Grup yönetimine ulaştığımız sonucu bildirmek.
- Grup'un iç kontrolünün etkinliği hakkında bir güvence sonucu bildirmek amacıyla değil ama iç kontrol yapısını anlamak ve sürdürülebilirlik bilgilerinin hata ve hile kaynaklı önemli yanlışlık risklerini tanımlamak ve değerlendirmek amacıyla risk değerlendirme prosedürleri yerine getirilmiştir.
- Sürdürülebilirlik Bilgileri'nin önemli yanlışlık içerebilecek alanları belirlemek ve bu alanlara yönelik prosedürler tasarlanmış ve uygulanmıştır. Hile; muvazaalı işlemler, sahtekârlık, işlemlerin kasıtlı olarak kayda geçirilmemesi veya denetçiye kasten gerçeğe aykırı beyanlarda bulunulması veya iç kontrolün ihlali gibi konuları içerebilmesi sebebiyle hile kaynaklı önemli bir yanlışlığı tespit edememe riski, hata kaynaklı önemli bir yanlışlığı tespit edememe riskinden daha yüksektir.

Yanlışlıklar hata veya hile kaynaklı olabilir. Yanlışlıkların, tek başına veya toplu olarak, Sürdürülebilirlik Bilgileri kullanıcılarının buna istinaden alacakları ekonomik kararları etkilemesi makul ölçüde bekleniyorsa bu yanlışlıklar önemli olarak kabul edilir.

Yönetim tarafından hazırlanan Sürdürülebilirlik Bilgileri hakkında bağımsız bir sonuç bildirmekle sorumlu olduğumuz için, bağımsızlığımızın tehlikeye girmemesi adına Sürdürülebilirlik Bilgileri'nin hazırlanma sürecine dâhil olmamıza izin verilmemektedir.

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Mesleki Standartların Uygulanması

KGK tarafından yayımlanan Güvence Denetimi Standardı 3000 “Tarihi Finansal Bilgilerin Bağımsız Denetimi veya Sınırlı Bağımsız Denetimi Dışındaki Diğer Güvence Denetimleri” ve Sürdürülebilirlik Bilgileri’nde yer alan sera gazı emisyonlarına ilişkin olarak Güvence Denetimi Standardı 3410 “Sera Gazı Beyanlarına İlişkin Güvence Denetimleri” ne uygun olarak sınırlı güvence denetimini gerçekleştirdik.

Bağımsızlık ve Kalite Yönetimi

KGK tarafından yayımlanan ve dürüstlük, tarafsızlık, mesleki yeterlik ve özen, sır saklama ve mesleğe uygun davranış temel ilkeleri üzerine bina edilmiş olan Bağımsız Denetçiler İçin Etik Kurallar’daki (Bağımsızlık Standartları Dâhil) (“Etik Kurallar”) bağımsızlık hükümlerine ve diğer etik hükümlere uygun davranmış bulunmaktayız. Şirketimiz, Kalite Yönetim Standardı 1 hükümlerini uygulamakta ve bu doğrultuda etik hükümler, mesleki standartlar ve geçerli mevzuat hükümlerine uygunluk konusunda yazılı politika ve prosedürler dâhil, kapsamlı bir kalite yönetim sistemi sürdürmektedir. Çalışmalarımız, denetçiler ve sürdürülebilirlik ve risk uzmanlarından oluşan bağımsız ve çok disiplinli bir ekip tarafından yürütülmüştür. Grup’un iklim ve sürdürülebilirlikle ilişkili risk ve fırsatlara yönelik bilgilerin ve varsayımların makuliyetini değerlendirmeye yardımcı olmak için uzman ekibimizin çalışmalarını kullandık. Verdiğimiz güvence sonucundan tek başımıza sorumluyuz.

Güvence Sonucuna Dayanak Olarak Yürütülen Çalışmanın Özeti

Sürdürülebilirlik Bilgileri’nde önemli yanlışlıkların ortaya çıkma olasılığının yüksek olduğunu belirlediğimiz alanları ele almak için çalışmalarımızı planlamamız ve yerine getirmemiz gerekmektedir. Uyguladığımız prosedürler mesleki muhakememize dayanır. Sürdürülebilirlik Bilgileri’ne ilişkin sınırlı güvence denetimini yürütürken:

- Grup’un anahtar konumdaki kıdemli personeli ile raporlama dönemine ait Sürdürülebilirlik Bilgileri’nin elde edilmesi için uygulamada olan süreçleri anlamak için görüşmeler yapılmıştır.
- Sürdürülebilirlik ile ilgili bilgileri değerlendirmek ve incelemek için Grup’un iç dokümantasyonu kullanılmıştır.
- Sürdürülebilirlik ile ilgili bilgilerin açıklanmasının ve sunumunun değerlendirilmesi gerçekleştirilmiştir.
- Sorgulamalar yoluyla, Sürdürülebilirlik Bilgileri’nin hazırlanmasıyla ilgili Grup’un kontrol çevresi ve bilgi sistemleri konusunda kanaat edinilmiştir. Ancak, belirli kontrol faaliyetlerinin tasarımı değerlendirilmemiş, bunların uygulanmasıyla ilgili kanıt elde edilmemiş ve işleyiş etkinlikleri test edilmemiştir.
- Grup’un tahmin geliştirme yöntemlerinin uygun olup olmadığı ve tutarlı bir şekilde uygulanıp uygulanmadığı değerlendirilmiştir. Ancak prosedürlerimiz, tahminlerin dayandığı verilerin test edilmesini veya Grup’un tahminlerini değerlendirmek için kendi tahminlerimizin geliştirilmesini içermemektedir.
- Grup’un sürdürülebilirlik raporlama süreçleriyle birlikte finansal olarak önemli olduğu tespit edilen risk ve fırsatların belirlenmesine ilişkin süreçler anlaşılmıştır.

Appendices

Limited Assurance Statement within the Scope of TSRS

Deloitte.

Güvence Sonucuna Dayanak Olarak Yürütülen Çalışmanın Özeti (Devamı)

Sınırlı güvence denetiminde uygulanan prosedürler, nitelik ve zamanlama açısından makul güvence denetiminden farklıdır ve kapsamı daha dardır. Sonuç olarak, sınırlı güvence denetimi sonucunda sağlanan güvence seviyesi, makul güvence denetimi yürütülmüş olsaydı elde edilecek güvence seviyesinden önemli ölçüde daha düşüktür.

DRT BAĞIMSIZ DENETİM VE SERBEST MUHASEBECİ MALİ MÜŞAVİRLİK A.Ş.
Member of **DELOITTE TOUCHE TOHMATSU LIMITED**



Zere Gaye Şentürk, SMMM
Sorumlu Denetçi

İstanbul, 16 Nisan 2026

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