W0. Introduction

W0.1

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

Having commenced its operations in 1972 at the Mersin Plant, Çimsa today operates with five integrated plants in Mersin, Eskişehir, Kayseri, Niğde, and Afyonkarahisar (Afyon Cimento), as well as one grinding facility in Ankara. Since 2013 Çimsa has 51% share of Afyon Cimento and fully integrated into the management system of Çimsa in 2018 including water management.

In addition to grey cement, Çimsa also produces special products such as white cement and calcium aluminate cement as well as ready-mixed concrete. Exporting white cement and special products to more than 65 countries, mainly to markets in the Middle East, Europe, North Africa, and the United States, Çimsa increases the recognition of its brand on international platforms as well as increasingly contributing to its sector and the Turkish economy.

One of the world's three leading brands of white cement, Çimsa is a truly international cement producer with its terminals in Hamburg (Germany), Trieste (Italy), Seville, and Alicante (Spain), Famagusta (TRNC), Constanza (Romania) and Novorossiysk (Russia).

Çimsa maintains its stable growth process backed by its long-standing experience in global and local markets, its know-how, and its R&D work which shapes the sector and its identity as a reliable partner for its 1,148 employees and stakeholders.

In its 47th year of operation, Çimsa took significant steps forward in building a sustainable future. Çimsa's aim of global leadership came one step closer with the agreement to acquire the Buñol Factory in Spain. Following the testing and enhancement work, Çimsa Americas started selling products in the final quarter of 2019. Meanwhile, the Joint Cultural Management One Team-One Voice project was carried out.

The company is also one of the industrial companies of Sabancı Group. Hacı Ömer Sabancı Holding A.Ş., one of Turkey's leading conglomerates, is the parent company and manages the Sabancı Group's companies with a strategic portfolio approach. Turkey's rapidly growing sectors including banking, insurance, energy, cement, retail, and industrial are the main business areas of Sabancı Group. Sabancı Group companies are market leaders in their respective sectors and currently operate in 13 countries and market their products in regions across Europe, Middle East, Asia, North Africa, North, and South America.

Strategy:

Çimsa defined its strategic foundations as;

• Sustainability

• Being Human Oriented, Global Culture

• Digital Transformation

Based on strategic foundations, **Çimsa's Strategy** is to serve as guidance for its decision-making processes in the Company's operations carried out in the domestic and international markets. Strategical areas to guide are determined as follows;

• Growth and integration

• Cash management, operational and technical discipline

• Digital and cultural transformation

Priorities defined based on the company strategy and stakeholder consultations are;

• Occupational Health and Safety

• Growing in International Markets

• Profitability and Dividends

• Equality at Work

• Customer Loyalty

• Risk Management

• Digitalization

• Cultural and Technological Transformation

The company follows the capital management model. Six capitals defined and every project under priorities evaluated upon 6 capitals which are;
1. Financial
2. Manufactured
3. Intellectual
4. Human
5. Social and relational
6. Natural.

The Water Strategy of the company is to utilize water efficiently and reduce water consumption during the production phase of the products which is a clear indicator of the life cycle approach of the company.

In 2016, Çimsa started to apply the "ISO 14046 Water footprint" standard which provides transparency, consistency, and credibility for assessing and reporting the water footprint. ISO 14046 is an international standard that defines principles, requirements, and guidelines for conducting and reporting a water footprint assessment. For 4 years, third party verification studies carried out successfully, and since then each year including 2020, ÇİMSA has been awarded ISO 14046 Water Footprint Certificate. **ÇİMSA** have a standardized system for monitoring the water consumption and discharged wastewater, also to ensure the quality of wastewater discharged. This is achieved by ISO 14046 Certification and Çimsa the first company in the Turkish cement sector. One of the leading actors of the Turkish industry, as a corporate conscious company, ÇİMSA runs important projects in its plants in the area of water as well. The quantitative target of Çimsa about water is a 40% decrease in water consumption.

W0.2

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

	Start date	End date
Reporting year	January 1 2020	December 31 2020

W0.3

(W0.3) Select the countries/areas for which you will be supplying data.

Turkey

W0.4

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

TRY

W0.5

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

Companies, entities or groups over which operational control is exercised

W0.6

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

Yes

W0.6a

(W0.6a) Please report the exclusions.

Exclusion	Please explain
Ready mixed concrete business line is excluded.	Cement and ready-mixed concrete are 2 different business lines in Çimsa. As per revenues, cement is relevant than ready-mixed concrete. The ready-mixed concrete business line is excluded however it is planned to be reported in the next years and in the ready-mixed concrete business line the water data is strictly followed.

W1. Current state

W1.1

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

	Direct use importance rating	Indirect use importance rating	Please explain
Sufficient amounts of good quality freshwater available for use	Not very important	Neutral	The quality of water used during the process is not crucial as not incorporated into products. Water is mainly necessary for cooling mechanical equipment and kiln exhaust gas conditioning for cooling in the process and for domestic usage and WASH. While white cement production requires more water, thus the quantity of water is important. Water is important both for the customers using Çimsa products as the products require water and for production, as cement requires water to chemically react and function or to be used in cement-based other products. The need for water for the upstream value chain is limited. In the near future, as we believe water will be a more valuable asset and water focus will increase, we started to direct our focus on water to increase water efficiency and dependency. Similarly, the importance of indirect use will increase. In the WHR (Waste Heat Recovery) unit at the Mersin plant, water quality is important. Water is treated through the membrane filter to prevent corrosion in pipes of the Boiler system before usage. Thus, we are aware of the importance of having sufficient amounts of water in expected quality water for our operations.
Sufficient amounts of recycled, brackish and/or produced water available for use	Important	Neutral	The main water consumption during the processes is in the cooling process. The treated domestic wastewater is re-used in our process for cooling exhaust gases in Eskişehir Plant since 2015, in Kayseri Plant since 2016 May and Afyon Plant since 2018. Using more recycled water will result in reducing water consumption and dependency on water. As we are committed to the reduction of water both for direct and indirect usage purposes and increasing usage of recycled water, we are planning to apply this methodology for all of our plants to decrease of usage freshwater from groundwater. On the other hand; the artificial lake in Eskişehir plant, founded on the migration route of birds, during immigration, birds use drinking water from this lake.

W1.2

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

	% of sites/facilities/operations	Please explain
Water withdrawals – total volumes	100%	We apply the "ISO 14046 Water footprint -- Principles, requirements, and guidelines" standard, and the water footprint monitoring system is improved as a result of ISO 14046 implementation. 100% of water withdrawal is measured. Water withdrawals from wells are monitored continuously by the flow meters and recorded to the “Well Meter Index Reading Form” monthly at each plant. The data is monitored monthly and consolidated by the Environment and Sustainability department. We have usage permits for all of our groundwater wells from local governance. Water withdrawals from municipal water are invoiced based on flow meter readings monthly.
Water withdrawals – volumes by source	100%	In Mersin and Ankara Plants, both well and municipal waters are used. In Eskişehir, Kayseri, Niğde, and Afyon Plants water are supplied from only wells. 100% of water withdrawal is measured. %99 of total withdrawal water is supplied from groundwater wells which are monitored by flow meters, the rest of it is supplied from municipal water that is invoiced based on flow meter readings.
Entrained water associated with your metals & mining sector activities - total volumes [only metals and mining sector]	<Not Applicable>	<Not Applicable>
Produced water associated with your oil & gas sector activities - total volumes [only oil and gas sector]	<Not Applicable>	<Not Applicable>
Water withdrawals quality	100%	There is no discharge in Eskişehir, Kayseri, and Afyon Plants since all wastewater is reused at the gas conditioning towers. Mersin plant's treated wastewater is discharged into the dry river in line with the Discharge Permission Certificate. Niğde plant's domestic wastewater are connected to the sewage treatment plant. Ankara plant's domestic wastewater are transporting to the municipal wastewater treatment plant with a sewage truck. In Mersin, bimonthly, treated wastewater is analyzed periodically by an accredited laboratory to comply with Water Pollution Control Regulation. Total Suspended Solids (TSS), Biochemical Oxygen Demand (BOD), Chemical Oxygen Demand (COD), and pH parameters are determined as pollutant parameters by the Water Pollution Control Regulation. All related quality parameters are monitored since only Mersin Plant's wastewater is discharged to the receiving body.
Water discharges – total volumes	76-99	The discharged water in the cement sector consists of only domestic water usage as the process water (cooling purposes) is evaporated. Therefore, discharges volume is estimated according to the number of employees for Mersin and Ankara facilities. The specific discharge volume is accepted 60 liters/day per person which is based on İller Bank Technical Specification. All assumptions are verified and found acceptable by the third-party verification institution. For Niğde Plant, wastewater is discharged to the municipal wastewater treatment plant and monitored through flow meters and invoices. The data is consolidated by the Environment and Sustainability department. 78% of discharged water is monitored through meters and invoices.
Water discharges – volumes by destination	100%	There is no discharge in Eskişehir, Kayseri, and Afyon Plants since all wastewaters are reused at the gas conditioning towers. Mersin plant's treated wastewater is discharged into the dry river in line with the Discharge Permission Certificate. Niğde and Ankara plant's domestic wastewater are transporting to the municipal wastewater treatment plant with sewage truck.
Water discharges – volumes by treatment method	100%	There is no discharge in Eskişehir, Kayseri, and Afyon Plants. In Mersin Plant, wastewater is treated by the biological wastewater treatment method which corresponds to 49% of total discharged water. 51% of total wastewater is connected to the municipal wastewater treatment facility through the sewerage system.
Water discharge quality – by standard effluent parameters	100%	Bimonthly, 47% of the total treated wastewater is analyzed periodically by an accredited laboratory to comply with the Turkish Water Pollution Control Regulation. BOD, COD, TSS, and pH parameters were also analyzed. The remaining wastewater which is 53% of total discharged water is directly connected to the municipal wastewater treatment facility.
Water discharge quality – temperature	100%	The data is monitored monthly and consolidated by the Environment and Sustainability department. We measure discharge quality data as per the local regulations. If it is required by the regulation, the temperature of discharge is monitored.
Water consumption – total volume	76-99	The water consumption is equal to the difference between the withdrawal and the discharge. In our company, water consumption includes total water evaporated for cooling purposes. The water consumption is based on wells and municipal water which are already measured by the flow meters. In Afyon Plant, we have several sub-meters measuring water consumption of every process such as cooling, raw mill, boiler. As a short-term target, we are planning to install flow meters in the Mersin plant to measure continuously product based water consumption. We aim to measure product-based water consumption in Mersin, Eskişehir, and Niğde plants as a long-term target.
Water recycled/reused	100%	In our process, the main water consumption is in the cooling process. The treated domestic wastewater is reused in our process for cooling exhaust gases in Eskişehir, Kayseri, and Afyon Plants. The reused wastewater amount is monitored monthly.
The provision of fully-functioning, safely managed WASH services to all workers	100%	The health and safety of all workers is the most important issue for our company and all precautions are taken for workers' health and safety. Therefore, hygienic water is provided to all workers for domestic water usage. The workers are able to have clean drinking water at 100% of all sites.

W1.2b

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

	Volume (megaliters/year)	Comparison with previous reporting year	Please explain
Total withdrawals	2405.93	Much higher	The total withdrawn water amount is increased by 44% compared to the previous year. Due to the increase in kiln operating times in 2020, the determined water use increased in parallel with the clinker production amount. In addition, with the hygiene measures taken due to the Covid-19 pandemic conditions in 2020, water consumption for the personal cleaning of the space and for employees increased. In this report, our threshold for "much higher" and "much lower" is 20%.
Total discharges	48.26	Much higher	The total discharged water amount is increased by 48% compared to the previous year. The total discharged water amount is increased depending on the withdrawn water. In this report, our threshold for "much higher" and "much lower" is 20%.
Total consumption	2357.67	Much higher	The total consumption of water amount is increased by 44% compared to the previous year. Due to the increase in kiln operating times in 2020, the determined water use increased in parallel with the clinker production amount. In addition, with the hygiene measures taken due to the Covid-19 pandemic conditions in 2020, water consumption for the personal cleaning of the space and for employees increased. In this report, our threshold for "much higher" and "much lower" is 20%.

W1.2d

(W1.2d) Indicate whether water is withdrawn from areas with water stress and provide the proportion.

	Withdrawals are from areas with water stress	% withdrawn from areas with water stress	Comparison with previous reporting year	Identification tool	Please explain
Row 1	Yes	76-99	About the same	WRI Aqueduct	We have production sites on four different basins: East Mediterranean Basin, Sakarya Basin, Seyhan Basin, and Akarçay Basin. The share of withdrawal water from basins is as follows: 54% of water is withdrawal from the East Mediterranean Basin, 34% of water is withdrawal from the Sakarya Basin, 9% of water is withdrawal from the Seyhan Basin and 6% of water is withdrawal from Akarçay Basin. We define water stress by applying the WRI Aqueduct tool. The coordinates of each production site are entered into the tool and water stress is analyzed through the WRI Aqueduct Water Risk Atlas. The risk is defined as Extremely High (>80%) for all basins which shows that our operations are located in water-stressed areas which are the same as the previous year.

W1.2h

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

	Relevance	Volume (megaliters/year)	Comparison with previous reporting year	Please explain
Fresh surface water, including rainwater, water from wetlands, rivers, and lakes	Not relevant	<Not Applicable>	<Not Applicable>	Fresh surface water is not withdrawal.
Brackish surface water/Seawater	Not relevant	<Not Applicable>	<Not Applicable>	Brackish surface water or seawater is not withdrawal.
Groundwater – renewable	Not relevant	<Not Applicable>	<Not Applicable>	The renewable groundwater is not withdrawal.
Groundwater – non-renewable	Relevant	2377.66	Much higher	Total withdrawn water from wells is increased by 43% compared to the previous year. Due to the increase in kiln operating times in 2020, the determined water use increased in parallel with the clinker production amount. In this report, our threshold for "much higher" and "much lower" is 20%.
Produced/Entrained water	Not relevant	<Not Applicable>	<Not Applicable>	The wastewater is treated and reused for cooling in our plants. However, in line with the CDP explanation, this water is not counted as produced water.
Third party sources	Relevant	28.27	Much higher	Total withdrawn municipal water is increased compared to the previous year. With the hygiene measures taken due to the Covid-19 pandemic conditions in 2020, water consumption for the personal cleaning of the space and for employees increased. In this report, our threshold for "much higher" and "much lower" is 20%.

W1.2i

(W1.2i) Provide total water discharge data by destination.

	Relevance	Volume (megaliters/year)	Comparison with previous reporting year	Please explain
Fresh surface water	Relevant	14.62	Lower	Mersin plant's treated wastewater is discharged into the dry river. The discharged water to dry river is decreased by 4% compared to the previous year. In this report, our threshold for "higher" and "lower" is between 4% and 19%.
Brackish surface water/seawater	Not relevant	<Not Applicable>	<Not Applicable>	Our wastewater is not discharged to any brackish surface water or seawater.
Groundwater	Not relevant	<Not Applicable>	<Not Applicable>	Our wastewater is not discharged to any groundwater.
Third-party destinations	Relevant	33.64	Much higher	The total discharged water is increased compared to the previous year since the amount of withdrawal water is increased compared to the previous year due to the hygiene measures taken due to the Covid-19 pandemic conditions in 2020. Water consumption for the personal cleaning of the space and for employees increased. In this report, our threshold for "much higher" and "much lower" is 20%.

W1.2j

(W1.2j) Within your direct operations, indicate the highest level(s) to which you treat your discharge.

	Relevance of treatment level to discharge	Volume (megaliters/year)	Comparison of treated volume with previous reporting year	% of your sites/facilities/operations this volume applies to	Please explain
Tertiary treatment	Not relevant	<Not Applicable>	<Not Applicable>	<Not Applicable>	We don't have any tertiary treatment facility.
Secondary treatment	Relevant	20.26	Higher	11-20	In Mersin Plant, wastewater is treated by the biological wastewater treatment method. The figure is increased by 14% compared to the previous year. In this report, our threshold for "higher" and "lower" is between 4% and 19%.
Primary treatment only	Not relevant	<Not Applicable>	<Not Applicable>	<Not Applicable>	We don't have any primary treatment facility.
Discharge to the natural environment without treatment	Not relevant	<Not Applicable>	<Not Applicable>	<Not Applicable>	The water is not discharged to the natural environment without treatment.
Discharge to a third party without treatment	Relevant	28	Higher	41-50	In the Istanbul Headquarters office, wastewater is transferred to the municipal wastewater treatment plant through the sewerage system. Niğde and Ankara plant's domestic wastewater are transporting to the municipal wastewater treatment plant with sewage truck. The total amount of discharged water to the municipality wastewater treatment plant is increased by 34% compared to the previous year. In this report, our threshold for "much higher" and "much lower" is 20%.
Other	Not relevant	<Not Applicable>	<Not Applicable>	<Not Applicable>	

W1.4

(W1.4) Do you engage with your value chain on water-related issues?

Yes, our suppliers

Yes, our customers or other value chain partners

W1.4a

(W1.4a) What proportion of suppliers do you request to report on their water use, risks and/or management information and what proportion of your procurement spend does this represent?

Row 1

% of suppliers by number

1-25

% of total procurement spend

1-25

Rationale for this coverage

The life cycle approach starts with supplier engagement for Cimsa. ISO 14001 Environmental Management System applied in Cimsa since 2008 which creates maturity an environmental point of view. Third-party and internal audits covers our stakeholder engagement especially the supply chain. Supplier contracts items are reviewed in terms of environmental requirements and all feedback's are evaluated for improvement of the system. Where available, water data's are requesting from suppliers and if the water management system is not applying, our teams lead them about the application of ISO 14046. All Supplier contracts cover GCCA supply chain 10 principles which are related to Human Rights, Labour, Environment, Anti-Corruption. Besides getting data within the supply chain, Cimsa focus to share its water management and sustainability know-how. Through surveys, online and offline meetings information's are sharing to grow a strong and focused supply chain.

Impact of the engagement and measures of success

The engagement with our suppliers provides to work with a similar vision of companies and create a strong and sustainable supply chain. At the know-how sharing level, the first objective was creating the same understanding of water management and sustainability with our supply chain. Our critical suppliers in terms of water and sustainability are working in ready-mix concrete and aggregates. They are started to collect the data for water and in the next years, they will be obliged to present their water consumptions to be Cimsa suppliers. This engagement caused to monitor the suppliers more closely on their costs.

Comment

W1.4b

(W1.4b) Provide details of any other water-related supplier engagement activity.

Type of engagement
No other supplier engagements

Details of engagement
<Not Applicable>

% of suppliers by number
<Not Applicable>

% of total procurement spend
<Not Applicable>

Rationale for the coverage of your engagement
The life cycle approach starts with supplier engagement for Cimsa. ISO 14001 Environmental Management System applied in Cimsa since 2008 which creates maturity an environmental point of view. Third-party and internal audits cover our stakeholder engagement especially the supply chain. Supplier contracts items are reviewed in terms of environmental requirements and all feedback's are evaluated for improvement of the system. Where available, water data's are requesting from suppliers and if the water management system is not applying, our teams lead them about the application of ISO 14046. All Supplier contracts cover GCCA supply chain 10 principles which are related to Human Rights, Labour, Environment, Anti-Corruption. Besides getting data within the supply chain, Cimsa focus to share its water management and sustainability know-how. Through surveys, online and offline meetings information's are sharing to grow a strong and focused supply chain.

Impact of the engagement and measures of success
<Not Applicable>

Comment
<Not Applicable>

W1.4c

(W1.4c) What is your organization's rationale and strategy for prioritizing engagements with customers or other partners in its value chain?

The **rationale of engagement with customers** about water consumption is based on creating a financial advantage and using less natural sources at the use phase of the product. This **strategy is depent on our life cycle approach** to our products. UPCEM product has been developed, which will consume %20 less water during the cement use phase. That's the vision of the inclusion value chain to our risk assessment and strategy.

The **measure for the success** of the engagement is the increased sales of UPCEM.

As Per Products;

White Cement:

Cimsa also has direct contact with its clients about water consumption volume and share information about the management model of white cement. As it is shared with the clients Cimsa applies ISO 14046 Water Management System and calculates its water consumption based on the production lines.

Ready Concrete:

We as Cimsa produce ready mix concrete and also we have clients who produce ready mix concrete. For this product, we organize stakeholder meetings with our customers and suppliers and share information about sustainability including water management.

W2. Business impacts

W2.1

(W2.1) Has your organization experienced any detrimental water-related impacts?
No

W2.2

(W2.2) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for water-related regulatory violations?
No

W3. Procedures

W3.3

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

Yes, water-related risks are assessed

W3.3a

(W3.3a) Select the options that best describe your procedures for identifying and assessing water-related risks.

Direct operations

Coverage

Full

Risk assessment procedure

Water risks are assessed as part of an enterprise risk management framework

Frequency of assessment

More than once a year

How far into the future are risks considered?

More than 6 years

Type of tools and methods used

Tools on the market
Enterprise Risk Management
International methodologies
Databases

Tools and methods used

WRI Aqueduct
ISO 31000 Risk Management Standard
Life Cycle Assessment
IPCC Climate Change Projections
Regional government databases
Other, please specify (ISO 14046-1 Water Management Standard)

Comment

Each department and sustainability committee defines their risk as per Risk Management Procedure. All risks are first reviewed by department managers then shared by the Corporate Risk Department. High and very high risks with solution alternatives about water are shared with Management Committee and Sustainability Committee to evaluate the offered action plans in terms of company strategy and budget. The final approval for the action plan is under the CEO responsibility. Identification and assessment of the risk are under the control of departments. All risks defined are shared with the Corporate Risk Department and if the risk is defined under natural capital then the risk is shared with the management and sustainability committee and CEO who is also leading the sustainability committee approve the action plans for high and very high risks. As an example, we apply ISO 14046 Water Management System to manage our water-related risks. With the application of the standard, water consumption and discharge levels, water flow in the process, water measurement points have been identified and water-related risks have been decreased.

Supply chain

Coverage

Partial

Risk assessment procedure

Water risks are assessed as part of an enterprise risk management framework

Frequency of assessment

Annually

How far into the future are risks considered?

More than 6 years

Type of tools and methods used

Enterprise Risk Management
International methodologies
Databases

Tools and methods used

ISO 31000 Risk Management Standard
Life Cycle Assessment
IPCC Climate Change Projections
Regional government databases
Other, please specify (ISO 14046 Water Management System)

Comment

Each department and sustainability committee define their risk as per Risk Management Procedure. All risks are first reviewed by department managers then shared by the Corporate Risk Department. High and very high risks with solution alternatives about water are shared with Management Committee and Sustainability Committee to evaluate the offered action plans in terms of company strategy and budget. The final approval for the action plan is under the CEO responsibility. Besides this general application of risk management procedures upstream risks related to water consumption in our value chain are focused on Logistic Operational and System Development. For our ready mix concrete product each year we organize stakeholder meetings with our customers and suppliers and share information about sustainability and water management and ISO 14046. Our life cycle assessment approach creates this engagement need to decrease the water consumption levels and creating water-related awareness in our supply chain. We define customer behaviour change as a risk and when demand on our products change based on environmental impacts including water then we and our suppliers have to be ready for this change.

Other stages of the value chain

Coverage
Partial

Risk assessment procedure
Water risks are assessed as part of an enterprise risk management framework

Frequency of assessment
Annually

How far into the future are risks considered?
More than 6 years

Type of tools and methods used
Enterprise Risk Management
International methodologies
Databases

Tools and methods used
ISO 31000 Risk Management Standard
Life Cycle Assessment
IPCC Climate Change Projections
Regional government databases
Other, please specify (ISO 14046 Water Management System)

Comment
Each department and sustainability committee define their risk as per Risk Management Procedure. All risks are first reviewed by department managers then shared by the Corporate Risk Department. High and very high risks with solution alternatives about water are shared with Management Committee and Sustainability Committee to evaluate the offered action plans in terms of company strategy and budget. The final approval for the action plan is under the CEO responsibility. Besides this general application of risk management procedures downstream risks related to water in our value chain are focused by the Strategical department(SD), Sales & Marketing Department, and R&D. The consumer expectations are in a big transition and we invest in R&D developing less natural resource use products. Risks about new products identified by the sales and marketing department are reviewed by the SD and R&D in terms of cost and possibility of development of a product as a solution. As an example, a low water consumption product (FLUX) development has increased because of the demand from the sales teams, and with the research of R&D and strategical Department. FLUX consume 20% less water at the use phase of the cement. This product will be the preferred product for water-stressed areas. Production with high volumes is the target of the company.

W3.3b

(W3.3b) Which of the following contextual issues are considered in your organization's water-related risk assessments?

	Relevance & inclusion	Please explain
Water availability at a basin/catchment level	Relevant, always included	It is very important for the sustainability of our business, therefore while assessing water-related risks, we prioritize water availability at facilities that withdraw water from wells. We apply ISO 14046 Water Management System standard and impact assessment about availability has been done through WRI Aqueduct Water Risk Atlas. The coordinates of each production site are entered into the tool and water stress is analyzed. The risk is defined as Extremely High (>80%) for all basins which shows that our operations are located in water-stressed areas. In 2020 1,5 Degree Special Report revised its drought level in Mediterranean Region as high. This is under the control of the Environment and Sustainability Department.
Water quality at a basin/catchment level	Relevant, always included	In our process, the main water consumption is in the cooling process. Besides, keeping the wastewater quality for discharged water is important for us both for compliance and stakeholder engagement. We provide the discharge quality levels as required by the regulation. Any deviation may create a risk for our environmental permission. Every two months, discharge water quality is analysed and our environmental departments have KPI's to follow the discharge water quality criteria. In the Mersin plant, we have a deep-sea discharge system so the quality levels also affect the relationship with locals. This is important for Cimsa to manage the reputation risk.
Stakeholder conflicts concerning water resources at a basin/catchment level	Relevant, always included	Stakeholder conflicts could cause disruptions in our clinker and cement productions and adversely affect our brand value, community relations impairment, and possible risk for termination of the license to operate, therefore it is included. Impact assessment about resources has been done through WRI Aqueduct Water Risk Atlas. The coordinates of each production site are entered into the tool and water stress is analyzed. The risk is defined as Extremely High (>80%) for all basins. This situation may create risks with our stakeholders and we believe that communication is important at this stage. We organize local stakeholder consultation meetings both with locals and public enterprises.
Implications of water on your key commodities/raw materials	Relevant, always included	Water impact on our raw materials is considered because any disruption on raw material can affect our production capacity.
Water-related regulatory frameworks	Relevant, always included	Water is essential for us to keep going on our production and as we are fully compliant with regulations, the regulations are very important for us, as they could directly affect our operations and operation costs. Beyond that, to prevent pollution, taking necessary precautions in our wastewater treatment plants is also important for discharged water. We provide the discharge quality levels as required by the regulation. Any deviation may create a risk for our environmental permission. Every two months, discharge water quality is analysed and our environmental departments have KPI's to follow the discharge water quality criteria. In the Mersin plant, we have a deep-sea discharge system so the quality levels also affect the relationship with locals. This is important for Cimsa to manage both the reputation risk and the regulatory risk.
Status of ecosystems and habitats	Relevant, always included	The protection of the ecosystem is an essential environmental objective for all our operations. For each mining area, and production plant, Environmental Impact Assessment is applied which includes the stakeholder consultation process to discuss the impact of water and other environmental criteria's. If necessary, mitigation and rehabilitation actions are defined and implemented.
Access to fully-functioning, safely managed WASH services for all employees	Relevant, always included	Health and safety are one of the focused subjects in Cimsa. All of our facilities provide WASH services for all workers, we pay great importance to maintain hygiene and Health and Safety conditions for all of our workers. Therefore, it is factored in our water risk assessment.
Other contextual issues, please specify	Not relevant, explanation provided	There are no other contextual issues.

W3.3c

(W3.3c) Which of the following stakeholders are considered in your organization's water-related risk assessments?

	Relevance & inclusion	Please explain
Customers	Relevant, always included	Our customers are one of the most important stakeholders for us. We are a cement exporting company and a substantial amount of our production is carried out in developed countries. Therefore meeting their regulations requirements related to export are our priorities. Also with the life cycle approach, our R&D department developed EPD Certified products which use less water. Our product which consumes less water is developed to support water-focused regions and consumer needs. We also apply ISO 14046 Water Management System and through our stakeholder meetings, we share information about our management system and water consumption levels.
Employees	Relevant, always included	Health and Safety are one of the focused areas in Cimsa because that access to clean water by employees is very important. Especially in 2020 due to the Covid-19 pandemic the water availability and use was very important in terms of protection. Water footprint and reporting training have been organized for the selected employees. Employees participated in water monitoring and water efficiency activities. In Cimsa we have an "idea factory" to promote good ideas and if an employee shares an idea to decrease the water consumption it is gradated with high levels.
Investors	Relevant, always included	We are a publicly-traded, exporting company of a reputable group in Turkey, Sabancı Holding. In addition to that, we are operating in an energy-intensive industry focused on Sustainability issues. Therefore, we consider our water risk assessment for the investors.
Local communities	Relevant, always included	We do care about the local communities where our operations took place. Since the water is a local source, local communities with their needs and expectations are included in our risk assessment. We have three different communication channels with local communities to get their needs and expectations. One of them is stakeholder meetings, the second one is phone calls and the last one is mail communication. Our corporate communication mail address is available on our website for complaint management.
NGOs	Relevant, always included	We take into consideration the feedback of NGOs and engage with them through stakeholder consultation meetings or surveys at the operation phase. On-site meetings are organized at the investment phase with the participation of NGO's. NGO's are taken into account while assessing our water risks because we have operations in high risks basins.
Other water users at a basin/catchment level	Relevant, always included	Due to the cumulative effect on the water sources, we include other water users for each basin into account. This creates us to evaluate the possible collaborations and risks. This also covers investment plans in the region. For example, a nuclear power plant may be invested in Mersin and this is considered since it may have high water consumption levels.
Regulators	Relevant, always included	Water is essential for us to keep on our production and as Çimsa, we fully comply with regulations. As regulations could directly affect our operations, they are very important for us. Beyond that to prevent pollution, taking necessary precautions is also important for discharged water.
River basin management authorities	Relevant, always included	Water is essential for us to keep on our production and as Çimsa, we fully comply with regulations. Therefore, the river basin management authorities are very important for us, because they could directly affect our operations and cause a halt of production. Beyond that, to prevent pollution, taking necessary precautions is also important for discharged water.
Statutory special interest groups at a local level	Not relevant, explanation provided	There are no significant statutory special interest groups.
Suppliers	Relevant, always included	All the risks are assessed according to the life cycle approach including supply chain assessment. Each department defines its risk as per Risk Management Procedures. High risks are assessed by the Management Committee and action plans are approved by the Executive Board. Sustainability Committee is also discussing the risks from the sustainability point of view and inform the management committee.
Water utilities at a local level	Relevant, sometimes included	We use groundwater withdrawn from wells and fresh water supplied from municipal mains water. Municipal water treatment facilities could be considered as water utilities at the local level. Water availability of well and mains water have been assessed as a risk.
Other stakeholder, please specify	Not relevant, explanation provided	There are no other relevant stakeholders.

W3.3d

(W3.3d) Describe your organization's process for identifying, assessing, and responding to water-related risks within your direct operations and other stages of your value chain.

CIMSA General Risk Management Process Applied in Terms of Water Management:

Integrated risk management applied to all processes of Cimsa. For identification, assessment, and responding to water-related risks and opportunities, the highest level of committees are Sustainability Committee(SC) and Management Committee(MC) led by the CEO.

Sustainability Committee(SC) led by CEO consists of the members of ;
Vice General Managers,
Operational Excellence Group Manager,
Waste Management Manager,
Corporate Risk Manager,
Strategic Planning and Project Management Office Coordinator,
Corporate Communications Manager,
Financial Planning and Analysis Manager
and Environment and Sustainability Executive as a committee secretary.

The responsibility of the Sustainability Committee is to follow the expected regulations that might have a high financial impact on business, developments in less natural resource use products, and potential high impacts of global reports like IPCC and Global Cement Industry and international conferences. The members of SC have responsibilities about relations with policymakers and the NGO's who work about sustainability including water for the cement industry. Those responsibilities create the vision and give a clear picture of sustainability and the level of awareness. As one of the highest level committees in the company, the Sustainability Committee, with these responsibilities, review the action plans proposed to manage the risks including water-related risks with the vision of a high level of sustainability knowledge.

The second committee is the Management Committee(MC). Management Committee with Sustainability Committee has the responsibility to approve the budgets of the action plans proposed to manage the high and very high risks.

The Sustainability Committee has Working Groups(WG) from each department to identify the risks including water-related risks. For example, if the risk is about regulation its environment and sustainability department and CTO's responsibility to define the risk and follow the approved actions. If the risk is about customers its Marketing Department and R&D's responsibility, for technological risks, Plant Managers are responsible and for Opex, CTO is responsible to define the risk and follow the approved action plan.

Cimsa also applies ISO 9001&14001 management systems which refer to ISO 31000 risk management standard. Under leadership requirements, it is also each department's responsibility to define the risks at the process and asset level in line with the Sustainability Working Group(WG) responsibility. If a risk is identified by the department after reviewing of the manager of the department Corporate Risk Department, are informed about the risk. To define water-related regulatory risks are Environment & Sustainability Department responsibility and as per risk management procedure, all risks are shared with CTO and Risk and Internal Control Department after review of the department manager.

All risks that are shared with the Corporate Risk Department are grouped as per the risk procedure of the company within 6 risk capitals which are financial capital, manufactured capital, intellectual capital, human capital, social and relational capital, natural capital. Natural capital covers environmental and air emissions management, climate&energy, water management, waste management, biodiversity, and ecosystem development activities and recycling and circular economy. In the risk assessment procedure, the financial impact of the risk and cost of the risk management has to be identified to understand the potential size of the risk and to give a clear picture to the decision-makers. The degrees of very high and high impacts have been defined in question W4.1.a. Once the risk is identified as high or very high, it is shared with the Management Committee (MC) and Sustainability Committee(SC) which are the highest level of committees for sustainability including water, for the review and approval of proposed action plan budget.

Case study for physical risk/opp. in 2020 about water based on IPCC report and expect drought in Turkey is studied. We as Cimsa apply ISO 14046 Water Management System and follow water consumption in our manufacturing plants and develop improvement plans based on production capacity.

W4. Risks and opportunities

W4.1

(W4.1) Have you identified any inherent water-related risks with the potential to have a substantive financial or strategic impact on your business?
Yes, both in direct operations and the rest of our value chain

W4.1a

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

Risk management is a fundamental function for Çimsa, constituting a key foundation in the decision-making process. All risks and uncertainties, whether or not they come under the control of Çimsa, present dynamic and varying characteristics. Within the scope of its business cycle, the policies and approaches Çimsa has followed or will follow in tackling risks and uncertainties have a critical bearing on the sustainability of the business cycle.

Within the scope of its business cycle, the policies and approaches Çimsa has followed or will follow in tackling risks and uncertainties have a critical bearing on the sustainability of the business cycle. In order the minimize the possible impacts of these risk factors on the Company's operations, Çimsa has been elaborating policies and actions plans for each risk category and has been implementing these within the scope of its daily business cycle.

Çimsa's risk management framework defines and manages risks with an approach to support the Company's strategic priorities and maintain the Company's future financial health and flexibility. The risk management approach is shaped by the continuous tracking of the risks to which Çimsa is exposed, the risk appetite, and the changes in risks over time. In addition to defining the general limits of the Company's risk appetite, the Board of Directors of Çimsa periodically monitors the development of risks and shapes the guiding policies and decisions in this field. Strategical plans are supported with quantitative risk and opportunity evaluation reports.

A risk matrix where risks are placed by their impact and likelihood is used for the calculation. Çimsa applies integrated risk management and categorizes all its risks based on the capital management model in the company to monitor and diversify the risks better. Six capitals defined the company implements risk assessment which are financial capital, manufactured capital, intellectual capital, human capital, social and relational capital, natural capital. One of the most important things in risk assessment is to define the level of risk. For 2020, the substantive financial impacts are defined as risks more than 20,000,000 TL and 15,350 tonnes of production loss. Strategical impacts on the business are defined as;

- Effect 50% of Çimsa clients
- Loss of critical supplier and not creating an alternative supplier
- Effect 50% of Çimsa employees
- Bad reputation internationally and on digital platforms
- The operation shut down by official authorities

Çimsa use impact If the result of the risk assessment quantitatively or qualitatively contains one or more from the list above then it is decided as high risk that might have a strategical impact on our business. All related departments have to define the solution with its cost to provide a clear picture of risk management.

As per the risk management procedure of Çimsa , all risks defined by the department are reviewed by the department manager and submitted to the Corporate Risk Department. The Corporate Risk Department reviews the risk and if it is defined as high it is submitted to the related committees. For water-related risks-high risks are submitted to the Management Committee(MC) and Sustainability Committee(SC).

In 2020, in line with the Çimsa water strategy and life cycle approach, less water consumption at the use phase of the cement were focused and UPCEM which consumes around 20% less water cement is developed. Sustainability Committee also focused on internal water consumption and internal water efficiency plans.

Our customers are one of the most important stakeholders for us. We are a cement exporting company and a substantial amount of our exportation is made to developed countries. Therefore, compliance with their regulations and requirements is one of our top priorities.

Our employees are our valuable assets. Particularly at WASH services, providing hygiene and health aspects to our employees are one of our top priorities.

We are a publicly-traded, exporting company of a reputable group in Turkey, Sabancı Holding. In addition to that, we are operating in an energy-intensive industry focused on Sustainability issues. Therefore investors are considered at our water risk assessment. On the other hand application of sustainability and water consumption reduction initiatives provide access to green finance based on ESG ratings.

W4.1b

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

	Total number of facilities exposed to water risk	% company-wide facilities this represents	Comment
Row 1	1	51-75	This percentage is calculated by dividing the Mersin Facility water withdrawal ratio to the total withdrawal ratio for all our 6 facilities. Mersin Facility is using 54% of all withdrawal water of our company. The ratio was 70% last year but with the inclusion of the Afyon Plant, it is decreased.

W4.1c

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

Country/Area & River basin

Turkey	Other, please specify (East Mediterranean)

Number of facilities exposed to water risk
1

% company-wide facilities this represents
51-75

Production value for the metals & mining activities associated with these facilities
<Not Applicable>

% company's annual electricity generation that could be affected by these facilities
<Not Applicable>

% company's global oil & gas production volume that could be affected by these facilities
<Not Applicable>

% company's total global revenue that could be affected
Less than 1%

Comment
Mersin Facility is using 51% of the water from all our 6 facilities. However, its effect on our total revenue is lower than 1%. We follow the efficiency in the plant to decrease our water withdrawal in line with our sustainability strategy.

W4.2

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

Country/Area & River basin

Turkey	Other, please specify (East Mediterranean)

Type of risk & Primary risk driver

Physical	Drought

Primary potential impact
Increased production costs

Company-specific description
According to the IPCC 5. Assessment Report, extreme precipitation patterns, and droughts are expected to realize with medium confidence in our geography as it is also stated in IPCC 1.5 degree Special Report, water scarcity is a high risk for our Mediterranean basin. Considering the vital role of water availability in cement/concrete production, water scarcity is taken into account as a chronic physical risk to Çimsa's risk assessment. Çimsa also conducts R&D activities for low water consuming products and looks for decreasing the water footprint in its processes. In this regard, Çimsa strictly applies ISO 14046 - Water Management Standard in all manufacturing facilities and follows water consumption rates to reduce water consumption levels. The possible price of groundwater consumption is defined as risk.

Timeframe
More than 6 years

Magnitude of potential impact
Medium-low

Likelihood
About as likely as not

Are you able to provide a potential financial impact figure?
Yes, a single figure estimate

Potential financial impact figure (currency)
15000000

Potential financial impact figure - minimum (currency)
<Not Applicable>

Potential financial impact figure - maximum (currency)
<Not Applicable>

Explanation of financial impact
The financial impact of the water risk is calculated based on the water sales price in the Mersin region for the industry which is 12,56 TL /m3 and the amount of water we use in our facility. Normally we don't pay for the groundwater, however, if this risk occurs, it might increase our production cost by around 15 million TRY.

Primary response to risk
Establish site-specific targets

Description of response
We have ISO 14046 water management certificate. With the management system we define some facility level efficiency targets.

Cost of response
40000

Explanation of cost of response
The cost of managing our water risk is based on the ISO 14046 Water Footprint Certificate and also the efficiency project cost done by facility level.

W4.2a

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

Country/Area & River basin

Turkey	Other, please specify (Mediterranean)

Stage of value chain
Use phase

Type of risk & Primary risk driver

Physical	Increased water scarcity

Primary potential impact
Reduced demand for products and services

Company-specific description
According to the IPCC 5. Assessment Report, extreme precipitation patterns, and droughts are expected to realize with medium confidence in our geography as it is also stated in IPCC Special Report on Climate Change in 2020, IPCC 1.5 degree Special Report water scarcity is a high risk for our Mediterranean basin. Considering the vital role of water availability in cement/concrete production, water scarcity is taken into account as a chronic physical risk to Çimsa's risk assessment. Çimsa also conducts R&D activities for low water consuming products and looks for decreasing the water footprint in its processes. The high volume of water need at the use phase is defined as a risk because water scarcity may cause a decrease in the sales of traditional cement in some regions like the Mediterranean Region.

Timeframe
More than 6 years

Magnitude of potential impact
Low

Likelihood
About as likely as not

Are you able to provide a potential financial impact figure?
Yes, a single figure estimate

Potential financial impact figure (currency)
20760

Potential financial impact figure - minimum (currency)
<Not Applicable>

Potential financial impact figure - maximum (currency)
<Not Applicable>

Explanation of financial impact
0.001 % of revenue has been considered as a risk potential. 2020 revenue has been multiplied with the risk potential and the potential financial impact of the water scarcity in the use phase of the product has been calculated as 20,760 TRY.

Primary response to risk

Direct operations	Develop new products and/or markets

Description of response
R&D department of Cimsa invested in low carbon product development which is UPCEM. It is expected to consume 20% less water-cement and industrial production is under development.

Cost of response
450000

Explanation of cost of response
R&D budget for development of low water consume products has been defined for the cost of the response.

W4.3

(W4.3) Have you identified any water-related opportunities with the potential to have a substantive financial or strategic impact on your business?
Yes, we have identified opportunities, and some/all are being realized

W4.3a

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

Type of opportunity
Efficiency

Primary water-related opportunity
Improved water efficiency in operations

Company-specific description & strategy to realize opportunity
Çimsa applies water management system and this system helps to; -Increase our market (including brand) value, our company image and provides a competitive advantage, - Decrease operational costs with efficiency improvement, - Increase our revenues by increasing demand for our existing products and also by developing new products. Improved water quality opportunities are crucial for us to support our employees and to develop positive stakeholder relations. To realize the strategy we are engaging with our stakeholders, and beyond that we started to get consultancy on Water Management.

Estimated timeframe for realization
More than 6 years

Magnitude of potential financial impact
Low

Are you able to provide a potential financial impact figure?
Yes, a single figure estimate

Potential financial impact figure (currency)
86077

Potential financial impact figure – minimum (currency)
<Not Applicable>

Potential financial impact figure – maximum (currency)
<Not Applicable>

Explanation of financial impact
In our process, the main water consumption is in the cooling process. By treating domestic wastewater and reusing it in our process for cooling exhaust gases, we achieved to reduce water consumption and dependency on water. The saving we provided in Kayseri Plant is defined as potential financial impact.

W5. Facility-level water accounting

W5.1

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

Facility reference number
Facility 1

Facility name (optional)
Mersin Cement Plant

Country/Area & River basin

Turkey	Other, please specify (East Mediterranean Basin)

Latitude
36.8

Longitude
34.633333

Located in area with water stress
Yes

Primary power generation source for your electricity generation at this facility
<Not Applicable>

Oil & gas sector business division
<Not Applicable>

Total water withdrawals at this facility (megaliters/year)
1246.24

Comparison of total withdrawals with previous reporting year
Much higher

Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes
0

Withdrawals from brackish surface water/seawater
0

Withdrawals from groundwater - renewable
0

Withdrawals from groundwater - non-renewable

1243.15

Withdrawals from produced/entrained water
0

Withdrawals from third party sources
3.09

Total water discharges at this facility (megaliters/year)
20.26

Comparison of total discharges with previous reporting year
Much higher

Discharges to fresh surface water
14.62

Discharges to brackish surface water/seawater
0

Discharges to groundwater
0

Discharges to third party destinations
5.64

Total water consumption at this facility (megaliters/year)
1225.98

Comparison of total consumption with previous reporting year
Much higher

Please explain
In Mersin Plant, both grey and white cement is produced. White cement production that needs more water is increased this year compared to the previous year. Water consumption is increased by 45% compared to the previous year. In this report, our threshold for "much higher" and "much lower" is 20%. Our water consumption figure is a calculation using withdrawals minus discharges.

Facility reference number
Facility 2

Facility name (optional)
Eskişehir Cement Plant

Country/Area & River basin

Turkey	Sakarya

Latitude
39.78

Longitude
30.520556

Located in area with water stress
Yes

Primary power generation source for your electricity generation at this facility
<Not Applicable>

Oil & gas sector business division
<Not Applicable>

Total water withdrawals at this facility (megaliters/year)
864.94

Comparison of total withdrawals with previous reporting year
Much higher

Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes
0

Withdrawals from brackish surface water/seawater
0

Withdrawals from groundwater - renewable
0

Withdrawals from groundwater - non-renewable
864.94

Withdrawals from produced/entrained water
0

Withdrawals from third party sources
0

Total water discharges at this facility (megaliters/year)
0

Comparison of total discharges with previous reporting year
About the same

Discharges to fresh surface water
0

Discharges to brackish surface water/seawater
0

Discharges to groundwater
0

Discharges to third party destinations
0

Total water consumption at this facility (megaliters/year)
864.94

Comparison of total consumption with previous reporting year
Much higher

Please explain
White cement production that needs more water is increased water consumption this year compared to the previous year. As a result of white cement production, water consumption is increased by 52% compared to the previous year. Domestic wastewaters produced at the Eskişehir Plant are reused as gas cooling water after purification, therefore there is no discharge. With this method, not only the discharge of purified water is prevented, but natural water sources are also saved. In this report, our threshold for "much higher" and "much lower" is 20%. Our water consumption figure is a calculation using withdrawals minus discharges.

Facility reference number
Facility 3

Facility name (optional)
Kayseri Cement Plant

Country/Area & River basin

Turkey	Other, please specify (Seyhan Basin)

Latitude
38.75

Longitude
35.549791

Located in area with water stress
Yes

Primary power generation source for your electricity generation at this facility
<Not Applicable>

Oil & gas sector business division
<Not Applicable>

Total water withdrawals at this facility (megaliters/year)
101.84

Comparison of total withdrawals with previous reporting year
Much higher

Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes
0

Withdrawals from brackish surface water/seawater
0

Withdrawals from groundwater - renewable
0

Withdrawals from groundwater - non-renewable
101.84

Withdrawals from produced/entrained water
0

Withdrawals from third party sources
0

Total water discharges at this facility (megaliters/year)
0

Comparison of total discharges with previous reporting year
About the same

Discharges to fresh surface water
0

Discharges to brackish surface water/seawater
0

Discharges to groundwater

0

Discharges to third party destinations
0

Total water consumption at this facility (megaliters/year)
101.84

Comparison of total consumption with previous reporting year
Much higher

Please explain
The water consumption is increased by 35% compared to the previous year. Domestic wastewaters produced at the Kayseri Plant are reused as gas cooling water after purification, therefore there is no discharge. With this method, not only the discharge of purified water is prevented, but natural water sources are also saved. In this report, our threshold for "much higher" and "much lower" is 20%. Our water consumption figure is a calculation using withdrawals minus discharges.

Facility reference number
Facility 4

Facility name (optional)
Niğde Cement Plant

Country/Area & River basin

Turkey	Other, please specify (Seyhan Basin)

Latitude
37.95

Longitude
34.686367

Located in area with water stress
Yes

Primary power generation source for your electricity generation at this facility
<Not Applicable>

Oil & gas sector business division
<Not Applicable>

Total water withdrawals at this facility (megaliters/year)
72.11

Comparison of total withdrawals with previous reporting year
Higher

Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes
0

Withdrawals from brackish surface water/seawater
0

Withdrawals from groundwater - renewable
0

Withdrawals from groundwater - non-renewable
72.11

Withdrawals from produced/entrained water
0

Withdrawals from third party sources
0

Total water discharges at this facility (megaliters/year)
7.6

Comparison of total discharges with previous reporting year
Much higher

Discharges to fresh surface water
0

Discharges to brackish surface water/seawater
0

Discharges to groundwater
0

Discharges to third party destinations
7.6

Total water consumption at this facility (megaliters/year)
64.51

Comparison of total consumption with previous reporting year
Much higher

Please explain
With the capacity increase investment for Niğde Plant, a new calciner, a new vertical raw mill, and a new clinker cooler were installed and the preheater cyclones were replaced with the new ones to decrease CO2 emissions in last reporting year. The amount of production and therefore water consumption was increased by 27% compared to the previous year. In this report, our threshold for "much higher" and "much lower" is 20%. Our water consumption figure is a calculation using withdrawals minus discharges.

Facility reference number
Facility 5

Facility name (optional)
Ankara Clinker Grinding Plant

Country/Area & River basin

Turkey	Sakarya

Latitude
39.97

Longitude
33.11712

Located in area with water stress
Yes

Primary power generation source for your electricity generation at this facility
<Not Applicable>

Oil & gas sector business division
<Not Applicable>

Total water withdrawals at this facility (megaliters/year)
1.55

Comparison of total withdrawals with previous reporting year
Much lower

Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes
0

Withdrawals from brackish surface water/seawater
0

Withdrawals from groundwater - renewable
0

Withdrawals from groundwater - non-renewable
0.13

Withdrawals from produced/entrained water
0

Withdrawals from third party sources
1.42

Total water discharges at this facility (megaliters/year)
1.39

Comparison of total discharges with previous reporting year
Much higher

Discharges to fresh surface water
0

Discharges to brackish surface water/seawater
0

Discharges to groundwater
0

Discharges to third party destinations
1.39

Total water consumption at this facility (megaliters/year)
0.15

Comparison of total consumption with previous reporting year
Much lower

Please explain
Water discharge and therefore water consumption have decreased compared to the previous year. The ratio of water transmission losses is decreased and the efficiency is improved this year. As a result of efficiency studies, water consumption is decreased by 93% compared to the previous year. In this report, our threshold for "much higher" and "much lower" is 20%. Our water consumption figure is a calculation using withdrawals minus discharges.

Facility reference number
Facility 6

Facility name (optional)

Afyon Cement Plant

Country/Area & River basin

Turkey	Other, please specify (Akarcay Basin)

Latitude
38.66

Longitude
30.615968

Located in area with water stress
Yes

Primary power generation source for your electricity generation at this facility
<Not Applicable>

Oil & gas sector business division
<Not Applicable>

Total water withdrawals at this facility (megaliters/year)
95.49

Comparison of total withdrawals with previous reporting year
About the same

Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes
0

Withdrawals from brackish surface water/seawater
0

Withdrawals from groundwater - renewable
0

Withdrawals from groundwater - non-renewable
95.49

Withdrawals from produced/entrained water
0

Withdrawals from third party sources
0

Total water discharges at this facility (megaliters/year)
0

Comparison of total discharges with previous reporting year
About the same

Discharges to fresh surface water
0

Discharges to brackish surface water/seawater
0

Discharges to groundwater
0

Discharges to third party destinations
0

Total water consumption at this facility (megaliters/year)
95.49

Comparison of total consumption with previous reporting year
About the same

Please explain
Domestic wastewaters produced at the Afyon Plant are reused as gas cooling water after purification, therefore there is no discharge. With this method, not only the discharge of purified water is prevented, but natural water sources are also saved. As a result of efficiency studies, water consumption is decreased by 3% compared to the previous year. In this report, our threshold for "about the same" is 3%. Our water consumption figure is a calculation using withdrawals minus discharges."

Facility reference number
Facility 7

Facility name (optional)
Istanbul Headquarters Office

Country/Area & River basin

Turkey	Other, please specify (Marmara Basin)

Latitude
40.98109

Longitude

29.100788

Located in area with water stress
Yes

Primary power generation source for your electricity generation at this facility
<Not Applicable>

Oil & gas sector business division
<Not Applicable>

Total water withdrawals at this facility (megaliters/year)
23.76

Comparison of total withdrawals with previous reporting year
This is our first year of measurement

Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes
0

Withdrawals from brackish surface water/seawater
0

Withdrawals from groundwater - renewable
0

Withdrawals from groundwater - non-renewable
0

Withdrawals from produced/entrained water
0

Withdrawals from third party sources
23.76

Total water discharges at this facility (megaliters/year)
19.01

Comparison of total discharges with previous reporting year
This is our first year of measurement

Discharges to fresh surface water
0

Discharges to brackish surface water/seawater
0

Discharges to groundwater
0

Discharges to third party destinations
19.01

Total water consumption at this facility (megaliters/year)
4.75

Comparison of total consumption with previous reporting year
This is our first year of measurement

Please explain
The water data of the headquarters office located in Istanbul is disclosed starting from this year.

W5.1a

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

Water withdrawals – total volumes

% verified
76-100

What standard and methodology was used?
It has been verified according to the "ISO 14046:2014 Environmental management - Water footprint Standard" by an accredited third-party verification body. All data has been verified with reasonable assurance level.

Water withdrawals – volume by source

% verified
76-100

What standard and methodology was used?
It has been verified according to the "ISO 14046:2014 Environmental management - Water footprint Standard" by an accredited third-party verification body. All data has been verified with reasonable assurance level.

Water withdrawals – quality

% verified
76-100

What standard and methodology was used?
It has been verified according to the "ISO 14046:2014 Environmental management - Water footprint Standard" by an accredited third-party verification body. All data has been verified with reasonable assurance level.

Water discharges – total volumes

% verified
76-100

What standard and methodology was used?
It has been verified according to the "ISO 14046:2014 Environmental management - Water footprint Standard" by an accredited third-party verification body. All data has been verified with reasonable assurance level.

Water discharges – volume by destination

% verified
76-100

What standard and methodology was used?
It has been verified according to the "ISO 14046:2014 Environmental management - Water footprint Standard" by an accredited third-party verification body. All data has been verified with reasonable assurance level.

Water discharges – volume by treatment method

% verified
76-100

What standard and methodology was used?
It has been verified according to the "ISO 14046:2014 Environmental management - Water footprint Standard" by an accredited third-party verification body. All data has been verified with reasonable assurance level.

Water discharge quality – quality by standard effluent parameters

% verified
76-100

What standard and methodology was used?
It has been verified according to the "ISO 14046:2014 Environmental management - Water footprint Standard" by an accredited third-party verification body. All data has been verified with reasonable assurance level.

Water discharge quality – temperature

% verified
Not verified

What standard and methodology was used?
<Not Applicable>

Water consumption – total volume

% verified
76-100

What standard and methodology was used?
It has been verified according to the "ISO 14046:2014 Environmental management - Water footprint Standard" by an accredited third-party verification body. All data has been verified with reasonable assurance level.

Water recycled/reused

% verified
Not verified

What standard and methodology was used?
<Not Applicable>

W6. Governance

W6.1

(W6.1) Does your organization have a water policy?
Yes, we have a documented water policy that is publicly available

W6.1a

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

	Scope	Content	Please explain
Row 1	Company-wide	Description of business dependency on water Description of business impact on water Description of water-related performance standards for direct operations Description of water-related standards for procurement Reference to international standards and widely-recognized water initiatives Company water targets and goals Commitment to align with public policy initiatives, such as the SDGs Commitments beyond regulatory compliance Recognition of environmental linkages, for example, due to climate change	In 2016, ÇİMSA started to apply the "ISO 14046 Water footprint - Principles, requirements, and guidelines" standard which provides transparency, consistency, reproducibility, and credibility for assessing and reporting the water footprint. ISO 14046 is an international standard defining principles, requirements and guidelines for conducting and reporting a water footprint assessment. Verified by the third party, for 5 years including the data for 2020, successfully ÇİMSA has been awarded ISO 14046 Water Footprint Certificate. The major target of ÇİMSA is to have a standardized system for monitoring the water consumption and discharged wastewater as well as to ensure the quality of wastewater discharged. Çimsa also focuses on SDG Targets and projects to create value. The approach is applied company-wide and ensures the definition of water targets and performance monitoring. Beyond its own operations, Çimsa started to study its value chain through its customers. With the development of low carbon cement which will consume 20% less water- for the same amount of durability. It directly causes less water consumption in the use phase of the product.

W6.2

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

Yes

W6.2a

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

Position of individual	Please explain
Chief Executive Officer (CEO)	The responsibility of the CEO about water-related issues come from integrated risk management. High and very high level of risks with their alternative solutions and budgets shared with the CEO. The CEO is informed by the Corporate Risk Department. CEO is the highest level of responsibility to approve the action plan with its budget with the guidance of the Management Committee and Sustainability Committee. Water-related risks in the long term horizon may need a high budget of investments that has a long technical lifetime. R&D budget for less water consumption cement (UPCEM) is also developed by the approval of the CEO. CEO as a sustainability committee chair represents the company in NGO's and international platforms which focused on sustainability. Achievement of SDG targets defined in Cimsa is also reporting to the CEO.
Other C-Suite Officer	Chief Technical Officer (CTO) has responsibilities for water-related issues. CTO is also a member of the management committee and the sustainability committee. The alternative fuel and alternative raw materials use, energy efficiency, technological investment alternatives for less natural resource consumption in the company are under CTO's responsibility. R&D projects for less carbon consumption, energy efficiency projects, and alternative fuel studies were approved by the CTO. He also follows the progress in water consumption reduction targets. For the management of technological risks CTO also has the responsibility to review the alternative investments reported by Plant Managers to solve the technological risk.

W6.2b

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

	Frequency that water-related issues are a scheduled agenda item	Governance mechanisms into which water-related issues are integrated	Please explain
Row 1	Scheduled - some meetings	Monitoring implementation and performance Overseeing acquisitions and divestiture Providing employee incentives Reviewing and guiding annual budgets Reviewing and guiding business plans Reviewing and guiding major plans of action Reviewing and guiding risk management policies Reviewing and guiding strategy Reviewing and guiding corporate responsibility strategy Reviewing innovation/R&D priorities Setting performance objectives	Water policy & strategies, performance & targets are particularly managed by Sustainability Committee and it is led by CEO. In quarterly meetings, supporting projects to use less natural resources like water with inline its strategical areas to guide growth & integration are reviewed. Management Committee is also responsible for water related issues because the company applies integrated risk assessment and they issue the risk procedures and monitor the risks. If a very high and high risk is defined as related to water consumption then it's the management committee's responsibility with Sustainability Committee to approve the risk management alternative with its budget. The management committee meets every month. The highest water risks come from possible regulative changes and customer behavior change. Those risks are shared by the Risk and Internal Control Department to Sustainability Committee and Management Committee. The approved action to mitigate the effect of the risk was an acceleration of R&D in terms of new low carbon product development and technology. The budget for R&D in 2020 was 6,7 million TL. The objectives of the company related to water come from the decrease the use of natural resources like water for the further years. All technical data verified by the third party and managing the water consumption in the daily operation is one of the company priorities.

W6.3

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

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

Responsibility
Assessing water-related risks and opportunities

Frequency of reporting to the board on water-related issues
Quarterly

Please explain
Water security is one of the most important subjects in sustainability management at ÇİMSA. The sustainability performance and the targets are particularly managed by a Sustainability Committee . The committee is led by the CEO and meets quarterly. It is the sustainability committee's responsibility to follow identify and assess the water-related risks under the management of the Environment and Sustainability Executive via the information gained from the operation. CEO and Environment and Sustainability Executive have responsibilities to represent the company in the NGO's who works for sustainability, water, or cement. The wider perspective in the committee is important for identifying and assessing the water-related risks.

Name of the position(s) and/or committee(s)
Other, please specify (Management Committee)

Responsibility
Managing water-related risks and opportunities

Frequency of reporting to the board on water-related issues
More frequently than quarterly

Please explain
The second committee which is responsible for climate-related issues is the Management Committee(MC). Management Committee with Sustainability Committee has the responsibility to approve the budgets of the action plans proposed to manage the high and very high risks. Those committees give the final decision about climate-related risks and opportunities to the CEO. They approve the budget for the mitigation of climate-related risks and invest in climate-related opportunities.

W6.4

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

	Provide incentives for management of water-related issues	Comment
Row 1	Yes	Incentives applied by Cimsa to achieve the targets including climate-related performance indicators to accelerate the transition to a low carbon economy and strength responsible production practices.

W6.4a

(W6.4a) What incentives are provided to C-suite employees or board members for the management of water-related issues (do not include the names of individuals)?

	Role(s) entitled to incentive	Performance indicator	Please explain
Monetary reward	Chief Executive Officer (CEO) Other C-suite Officer (Chief Technical Officer)	Reduction in consumption volumes Improvements in efficiency - direct operations Implementation of employee awareness campaign or training program Supply chain engagement	The CEO is the main responsible of the performance, driven by ÇİMSA and defined KPIs. KPIs related to water comes from decreased use of natural resources that creates a decrease in operational costs and the second issue is creating environmental positive effect at the use phase of the product. Also, SDG target achievements are reporting to the CEO.
Non-monetary reward	Chief Executive Officer (CEO) Other C-suite Officer (Chief Technical Officer)	Reduction of water withdrawals Reduction in consumption volumes Improvements in efficiency - direct operations Supply chain engagement	"One Team" project for Cimsa employees continued in 2020. The project consists of the understanding of company culture and the low carbon transition for the future including less natural resource consumption. Especially supply chain engagement is focused based on a life cycle approach.

W6.5

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

Yes, direct engagement with policy makers

W6.5a

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

Our company strategy is to track the environment-related engagement activities across different business divisions continuously and attend platforms such as Climate Change Committees of Ministry of Environment and Urbanization, TCMA (Turkish Cement Manufacturers Association), and Association of Turkish Construction Material Producers (IMSAD).

We take an active role especially in associations on sustainability, water security, climate change, and environmental pillars. We develop common solutions about water security, climate change, and environmental issues, share studies, learnings, and enhancements in production processes; share targets about climate change inline with all companies related to the Sabancı Holding.

Turkish Cement Manufacturers Association, in the cement industry, efforts are driven to decrease GHG emissions.

Also, Çimsa became the first and only Turkish company joining the *Global Cement and Concrete Association*.. As sustainability committee members, we take part in task forces of GCCA related water issues since 2013. GCCA creates a unique platform where members can share information at national, regional, and international levels, discuss their best practices, and make decisions by taking advantage of their experiences. Through the annual forum meetings, GCCA members are able to discuss the current situation and development areas in various sustainability issues.

W6.6

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

Yes (you may attach the report - this is optional)

CIMSA_SD Rapor_2020.pdf

W7. Business strategy

W7.1

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

	Are water-related issues integrated?	Long-term time horizon (years)	Please explain
Long-term business objectives	Yes, water-related issues are integrated	16-20	Mersin Facility is the largest water consumer among all our 6 facilities with 54%. However, when we calculate the risk on our revenue it is less than 1% and it is not strategically significant as per our risk management procedure. Beyond our own operations, our main strategy about water is less water consumption at the use phase of the cement. Our R&D department developed 20% more efficient cement with the same durability. Besides 20% less water consumption, with the product, less raw material consumption is in place.
Strategy for achieving long-term objectives	Yes, water-related issues are integrated	16-20	Mersin Facility is the largest water consumer among all our 6 facilities with 54%. Beyond our own operations, Cimsa makes R&D investments to add value to the value chain. Less natural resource consumption is one of the policy items in our environmental management policy.
Financial planning	No, water-related issues were reviewed but not considered as strategically relevant/significant	16-20	Mersin Facility is the largest water consumer among all our 6 facilities with 54%. However, when we calculate the risk on our revenue it is less than 1% and it is not strategically significant as per our risk management procedure.

W7.2

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

Row 1

Water-related CAPEX (+/- % change)

0

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

0

Water-related OPEX (+/- % change)

0

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

0

Please explain

We had no water-related investments in 2020 so our water-related CAPEX and OPEX are the same as the previous year.

W7.3

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

	Use of climate-related scenario analysis	Comment
Row 1	Yes	ÇİMSA adopts the RCP 4.5 scenario while formulating the transition to a low carbon economy. The RCP4.5 scenario is defined by IPCC as an intermediate stabilization pathway with medium confidence projecting global surface temperature change for the end of the 21st century more likely than not to exceed 2°C relatives to 1850-1900. The highest negative impact scenario under these circumstances affecting our geography of operations is based on IPCC 5th assessment report pointing the increasing chronicle effects of extreme weather events IPCC 1.5 C Report, updated the increasing water scarcity risk for the Mediterranean basin in 2020. Even though water scarcity is indirectly affecting ÇİMSA's operations, ÇİMSA takes all potential climate change triggered risks into account with chronic risks in long term and the acute effects in a short term into account with increased frequencies are integrated to 15 years for scenario analysis.

W7.3a

(W7.3a) Has your organization identified any water-related outcomes from your climate-related scenario analysis?

Yes

W7.3b

(W7.3b) What water-related outcomes were identified from the use of climate-related scenario analysis, and what was your organization's response?

	Climate-related scenarios and models applied	Description of possible water-related outcomes	Company response to possible water-related outcomes
Row 1	2DS Other, please specify (IPCC Special report about 1,5 Degrees)	Cimsa used scenario analysis for defining risks and opportunities. The company-specific data used where possible and publicly available documents for the acceptances. We did our scenario analysis for 2 degrees as per IPCC 5th assessment report. It is expected to have drought except for northeast of Turkey with medium confidence. Business as usual scenario is using the groundwater however if 2 degrees path won't change we can not find the water in our facility and it may cause an increase in our production costs.	The water-related effect of the 2 degrees scenario is less than 1% of our revenue. However, we define facility-based efficiency targets and get ISO 14046 certification to manage water risk systematically.

W7.4

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

Row 1

Does your company use an internal price on water?

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

Please explain

Water-related risks are very low in our revenue however we still have systems to manage the water. But we don't use any internal pricing while we manage our water consumption.

W8. Targets

W8.1

(W8.1) Describe your approach to setting and monitoring water-related targets and/or goals.

	Levels for targets and/or goals	Monitoring at corporate level	Approach to setting and monitoring targets and/or goals
Row 1	Company-wide targets and goals	Targets are monitored at the corporate level	In 2016, we have started to apply ISO 14046 standard and the water footprint monitoring system is improved as a result of ISO 14046 implementation studies. 100% of water withdrawal is measured. Water withdrawals from wells are monitored continuously by the flow meters and recorded to the "Well Meter Index Reading Form" monthly at each plant. Our Management Committee has a systematic process, managing risks in accordance with the Company's corporate risk-taking profile, and assuring a reasonable level of assurance that the Company will achieve its objectives; and which is influenced by the Company's Board of Directors, senior management and all other employees to use in determining the strategies. Risk management covers sustainability-based risks. The highest level of the body responsible for corporate risk management is the Management Committee. The Committee is responsible for ensuring the effectiveness of institutional risk systems, risk perception, and preventive actions. It is the responsibility of the Institutional Risk Management Unit to pass the risk management system into life and to implement the defined processes. As a result of Sustainability Committee studies, water efficiency plans were suggested and some investments were made, such as reusing discharged wastewater and installing photocell water taps in Afyon Plant in 2018.

W8.1a

(W8.1a) Provide details of your water targets that are monitored at the corporate level, and the progress made.

Target reference number
Target 2

Category of target
Water withdrawals

Level
Company-wide

Primary motivation
Reduced environmental impact

Description of target
We aim to reduce our total water withdrawal by 25% until 2030 at company-wide.

Quantitative metric
% reduction in total water withdrawals

Baseline year
2019

Start year
2019

Target year
2030

% of target achieved
0

Please explain
Our total withdrawal water amount is 1,671,757 liters in 2019 that is defined as the base year. We aim to reduce our total water withdrawal by 25% until 2030 company-wide. In the reporting year, the total amount of withdrawn water is 2,382,167 liter. In 2020, the total capacity has increased, and consequently, water consumption increased. In addition, with the hygiene measures taken due to the Covid-19 pandemic conditions in 2020, water consumption for the personal cleaning of the space and for employees increased. It is aimed to reduce water amount by taking relevant actions.

Target reference number
Target 3

Category of target
Water withdrawals

Level
Company-wide

Primary motivation
Increase freshwater availability for users/natural environment within the basin

Description of target
Çimsa aims to reduce its water consumption per tonne of clinker by 20% by 2030 compared to its 2020 level. In 2020, 0.38 m3 of water was consumed per tonne of clinker produced; we aim to reduce this to 0.30 m3 by 2030.

Quantitative metric
% reduction per unit of production

Baseline year
2020

Start year
2020

Target year
2030

% of target achieved

Please explain
Since this is the first monitoring year of the defined target, "% of target achieved" is not applicable.

W9. Verification

W9.1

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

W9.1a

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

Disclosure module	Data verified	Verification standard	Please explain
W1 Current state	The following parameters have been verified by an accredited third party: - Water withdrawals – total volumes - Water withdrawals – volumes by source - Water discharges – total volumes - Water discharges – volumes by destination - Water discharges – volumes by treatment method - Water consumption – total volume - Water recycled/reused	Other, please specify (ISO 14046 Water Management Standard)	2020 water data of Çimsa is verified by a third party as per ISO 14046 Water Management Standard.
W1 Current state	The following parameters have been verified by an accredited third party: - Water consumption (m3) - Water recycled and reused (m3) - Total amount of discharged water (m3)	ISAE 3000	2020 water data of Çimsa is verified by a third party as per ISAE 3000.

W10. Sign off

W-FI

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

W10.1

(W10.1) Provide details for the person that has signed off (approved) your CDP water response.

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

W10.2

(W10.2) Please indicate whether your organization agrees for CDP to transfer your publicly disclosed data on your impact and risk response strategies to the CEO Water Mandate's Water Action Hub [applies only to W2.1a (response to impacts), W4.2 and W4.2a (response to risks)].

No

Submit your response

In which language are you submitting your response?

English

Please confirm how your response should be handled by CDP

	I am submitting to	Public or Non-Public Submission
I am submitting my response	Investors	Public

Please confirm below

I have read and accept the applicable Terms