



United Nations
Global Compact

We thank you for your time spent taking this survey.
Your response has been recorded.

CEO Statement of Continued Support

To our stakeholders,

I am pleased to confirm that SMART GÜNEŞ ENERJİSİ TEKNOLOJİLERİ ARAŞTIRMA GELİŞTİRME ÜRETİM SANAYİ VE TİCARET ANONİM ŞİRKETİ reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment, and Anti-Corruption.

In this annual Communication on Progress, we disclose our continuous efforts to integrate the Ten Principles into our business strategy, culture, and daily operations, and contribute to United Nations goals, particularly the Sustainable Development Goals.

Sincerely yours,

C1. Please complete the following information:

CEO/Highest-level executive name: Halil DEMİRDAĞ

CEO/Highest-level executive full title: Chairperson of the Board

Company name: SMART GÜNEŞ ENERJİSİ TEKNOLOJİLERİ ARAŞTIRMA GELİŞTİRME ÜRETİM SANAYİ VE TİCARET ANONİM ŞİRKETİ

C2. Please confirm:

- ☐ I am the CEO or highest-level executive.
- ☒ **I have received permission to sign on behalf of the CEO or highest-level executive.**

C2.1. If applicable, form completed on behalf of the CEO or highest-level executive by:

Filiz AVŞAR AKTAŞ

R1. How will you complete the CoP reporting requirement?

(Select one)

- ☒ Complete the digital questionnaire with the option to also add a sustainability report (Recommended)
- ☐ Only upload a sustainability report

R2. What is the time period covered by your Communication on Progress? (MM/YYYY – MM/YYYY)

Please share the date range of the reporting period used for the Communication on Progress option you select.[i](#)

01/2024 – 12/2024

R3. (Optional) Please clarify the scope of reporting covered by your Communication on Progress. For example, please describe the operational scope of your CoP, (e.g., corporate office, investments, subsidiaries) as needed.[i](#)

Operational scope of this CoP covers corporate office and production facilities located in Gebze-Kocaeli and Aliağa-İzmir

Success Stories & Future Priorities

SI. (Optional) Within the reporting period, is there an initiative(s), project(s), and/or policy(ies) of which your company is particularly proud?

Disclaimer: These initiatives are self-reported and have not been independently verified by the UN Global Compact. By responding to this question, you consent to being contacted by the UN Global Compact regarding these initiatives for potential inclusion as examples in UN Global Compact resources.

This stand-out effort relates to:

(Select all that apply) 

- ☐ Governance
- ☐ Human Rights
- ☐ Labour
- ☒ **Environment**
- ☐ Anti-Corruption

SI.A. Please provide a link and/or provide additional information:

Calculating the carbon footprint of the locations indicated in the scope of the CoP and verified it via ISO 14064 certification.

(Optional) Please upload an outcome-focused document:

Drop files or click here to upload

S2. Which of the five issue areas does the company plan to prioritize in the next two years?

(Select all that apply) [i](#)

- ☐ Governance
- ☒ **Human Rights**
- ☐ Labour
- ☒ **Environment**
- ☐ Anti-Corruption
- ☐ None

S2A. (Optional) Please provide additional information:

For the environment section, we plan to measure water footprint due to new process in the production activities. After measuring our water footprint, we aim to take measures to reduce our footprint and conduct efficiency studies. For human rights section, we already developed a sustainable supply chain strategy. We aim to implement this strategy to our sub-tier suppliers within next two years.

[Click for additional guidance](#)

G1. Does the board/highest governance body or most senior executive of the company:

(Select all that apply) [i](#)

- ☒ **Issue an annual statement about the relevance of sustainable development to the company**
- ☒ **Issue an annual statement that addresses impacts on both people and the environment**
- ☒ **Issue an annual statement highlighting a zero tolerance for corruption**
- ☒ **Sign off on organizational sustainability targets**
- ☒ **Supervise Environmental, Social, and Governance reporting**
- ☒ **Regularly review potential risks related to the business model**
- ☐ None of the above

G1A. (Optional) Please provide additional information:

G2. Does the company have a code of conduct in place regarding each of the following sustainability topics?

(Select one answer option per line) 

	No, this is not a current priority	No, but we plan to within the next two years	Yes, focused on employees	Yes, focused on employees and suppliers	Yes, focused on our own operations and the value chain (e.g., suppliers, consumers, communities, other business relationships)
Human Rights	☐	☐	☐	☐	☒
Labour Rights/Decent Work	☐	☐	☐	☐	☒
Environment	☐	☐	☐	☐	☒
Anti-Corruption	☐	☐	☐	☐	☒

G2A. (Optional) Please provide additional information:

We have related policies published on company website. Please see <https://www.smartsolar.com.tr/en/companypolicies.html> for further details.

G3. Has the company appointed an individual or group responsible for each of the following sustainability topics?

(Select one answer option per line) i

	No one is specifically responsible for this topic	Yes, with limited influence on outcomes (e.g., limited access to internal information, limited decision-making authority)	Yes, with moderate influence on outcomes (e.g., has access to relevant information, reports to senior manager)	Yes, with direct influence of some outcomes (e.g., has access to relevant information, includes one or more senior manager with decision making rights)	Yes, with direct influence at the highest levels of the company (e.g., has access to relevant information, includes most senior members of company)
Human Rights	☐	☐	☐	☐	☒
Labour Rights/Decent Work	☐	☐	☐	☐	☒
Environment	☐	☐	☐	☐	☒
Anti-Corruption	☐	☐	☐	☐	☒

G3A. (Optional) Please provide additional information:

G3.1. If yes, does the company also have formal governance structures (e.g., committees or governance bodies) in place to provide strategic oversight and support for these sustainability topics?

(Select one answer option per line) **i**

	No formal structure	Yes, with limited influence on outcomes (e.g., limited access to internal information necessary to understand risks, poor representation from relevant departments or functions)	Yes, with moderate influence on outcomes (e.g., includes representatives of some functions, departments, or business units most relevant for addressing the risks concerned, has access to relevant information, reports to senior manager)	Yes, with direct influence on some outcomes (e.g., includes representatives of functions, departments, or business units most relevant for addressing the risks concerned, has access to relevant information, involves one or more members of senior management)	Yes, with direct influence at the highest level of the company (e.g., full access to relevant information, involves members at highest level of company)
Human Rights	☐	☐	☐	☐	☒
Labour Rights / Decent Work	☐	☐	☐	☐	☒
Environment	☐	☐	☐	☐	☒
Anti-Corruption	☐	☐	☐	☐	☒

G3.1A (Optional) Please provide additional information:

G4. Does the company have a process to identify, assess and mitigate risks related to the following sustainability topics?

(Select one answer option per line) **i**

	No, this is not a current priority	No, but we plan to within the next two years	Yes, conducted by a designated individual or group	Yes, engaging employees across the company	Yes, engaging employees and business partners	Yes, engaging employees, business partners and external stakeholders
Human rights risks	☐	☐	☐	☐	☐	☒
Labour rights risks	☐	☐	☐	☐	☐	☒
Environmental risks	☐	☐	☐	☐	☐	☒
Corruption risks	☐	☐	☐	☐	☐	☒

G4A. (Optional) Please provide additional information:

G4.1. As part of the risk identification, assessment and mitigation process, has the company identified business partners and external stakeholders where the risk related to human rights, labour, environment and/or corruption may be particularly severe?

(Select one answer option per line) i

	Yes	No
Human rights risks	☒	☐
Labour rights risks	☒	☐
Environmental risks	☒	☐
Corruption risks	☒	☐

G4.1A. (Optional) Please provide additional information:

G5. Does the company have a due diligence process through which it identifies, prevents, mitigates and accounts for actual and potential negative impacts on sustainability topics?

(Select one answer option per line) 

	No, this is not a current priority	No, but we plan to within the next two years	Yes, related to our own operations	Yes, related to our own operations and suppliers	Yes, related to our own operations and the value chain (including suppliers, consumers, communities, other business relationships)
Human rights risks	☐	☐	☐	☐	☒
Labour rights risks	☐	☐	☐	☐	☒
Environmental risks	☐	☐	☐	☐	☒
Corruption risks	☐	☐	☐	☐	☒

G5A. (Optional) Please provide additional information:

G5.1. During the due diligence process, has the company identified those suppliers and/or other business relationships where the risk of adverse impacts on human rights, labour, environment and/or anti-corruption may be particularly severe?

(Select one answer option per line) 

	Yes	No
Human rights risks	☒	☐
Labour rights risks	☒	☐
Environmental risks	☒	☐
Corruption risks	☒	☐

G5.1A. (Optional) Please provide additional information:

G6. Does the company have a process(es) through which members of the company's workforce can raise concerns about the company's conduct on sustainability topics?

(Select one answer option per line) i

	No, this is not a current priority	No, but we plan to within two years	Yes, we have an informal process (e.g., through supervisors, others)	Yes, we have a formal process
Human Rights	☐	☐	☐	☒
Labour Rights / Decent Work	☐	☐	☐	☒
Environment	☐	☐	☐	☒
Anti-Corruption	☐	☐	☐	☒

G6A. (Optional) Please provide additional information:

For this purpose, internal and external grievance mechanisms were implemented.

G6.1. Please provide additional detail regarding the process(es) the company has through which members of the company’s workforce can raise concerns about the company’s conduct.

(Select one answer option per line) i

	Yes	No
Is the process communicated to all employees/workers in local languages?	☒	☐
Is the process available to non-employees (e.g., suppliers, consumers, communities, and other business relationships)?	☒	☐
Is the process confidential (e.g., whistleblowing process)?	☒	☐
Are there processes in place to avoid retaliation?	☐	☒
Can concerns be raised about suppliers or other business relationships (e.g., clients, partners, etc.)?	☒	☐
Other (Please provide additional information)	☐	☒

G6.1A. (Optional) Please provide additional information:

G7. How does the company track the effectiveness of its actions, and the related impacts, of the following sustainability topics?

(Select one answer option per line) i

	No actions and related impacts are systematically tracked	Conducts investigation reviews of incidents on an as-needed basis	Conducts investigation/review of incidents and changes organizational policies, processes, and practices accordingly	Conducts investigation reviews and leverages learnings to influence both internal and external affairs
Human Rights	☐	☐	☐	☒
Labour Rights/Decent Work	☐	☐	☐	☒
Environment	☐	☐	☐	☒
Anti-Corruption	☐	☐	☐	☒

G7A. (Optional) Please provide additional information:

G8. Is executive pay linked to performance on one or more of the following sustainability topics?

(Select one answer option per line) i

	No, this is not a current priority	No, but we plan to within the next two years	Yes
Human Rights	☐	☒	☐
Labour Rights / Decent Work	☐	☒	☐
Environment	☐	☒	☐
Anti-Corruption	☐	☒	☐

G8A. (Optional) Please provide additional information:

G9. Please provide details regarding the company's board/highest governance body. ⓘ

(Please enter only whole numbers rounded to the nearest whole number. Do not use decimals, fractions, special characters, spaces, or leading zeros. For 'Male, Female, Other', 'Under 30 years old, 30–50 years old, Above 50 years old' and 'Executive, Independent' please enter only whole numbers from 0 to 100, inclusive ensuring the values in the column sum to 100 to move on.)

(Text box with option for 'Not applicable')

	Known	Number (Please input a whole number)	Not applicable
Total number of board members (#)	☒	11	☐
	Known	Number (Please input a whole number e.g., 50% = 50)	Not applicable
Male (%)	☒	55	☐
Female (%)	☒	45	☐
Other (%)	☐		☒

	Known	Number (Please input a whole number e.g., 50% = 50)	Not applicable
Under 30 years old (%)	☒	0	☐
30-50 years old (%)	☒	18	☐
Above 50 years old (%)	☒	82	☐

	Known	Number (Please input a whole number e.g., 50% = 50)	Not applicable
From minority or vulnerable groups (%)	☒	0	☐

	Known	Number (Please input a whole number e.g., 50% = 50)	Not applicable
Executive (%)	☒	64	☐
Independent (%)	☒	36	☐

G9A. (Optional) Please provide additional information:

G10. Within the reporting period, what was the percentage of women in managerial positions?

(Select one answer option per line, if 'Known', include the value. Please enter only whole numbers from 0 to 100, inclusive, rounded to the nearest whole number. Do not use decimals, fractions, special characters, spaces, or leading zeros.) 

	Known	Percentage of women (%) (Please input a whole number e.g., 50% = 50)	Unknown
Managerial positions	☒	13	☐

G10A. (Optional) Please provide additional information:

G11. What is the gender representation of the company's C-suite or equivalent executive leadership positions?

(Select all that apply for each line) 

	Women	Men	Other (e.g., non-binary)	Not applicable (e.g., the company does not have this position)	Choose not to disclose
Chief Executive Officer	☐	☒	☐	☐	☐
Chief Financial Officer	☐	☒	☐	☐	☐
Chief Procurement Officer	☐	☒	☐	☐	☐
Chief Technology Officer	☒	☐	☐	☐	☐
Chief Marketing Officer	☐	☒	☐	☐	☐
Chief Operations Officer	☐	☒	☐	☐	☐
Chief Sustainability Officer	☒	☐	☐	☐	☐
Chief Legal Officer/General Counsel	☐	☒	☐	☐	☐
Chief Human Resources Officer	☐	☒	☐	☐	☐
Other (Please provide additional information)	☐	☐	☐	☒	☐

G11A. (Optional) Please provide additional information:

G12. Do you produce sustainability reporting according to:

(Select all that apply) **i**

☒ **National/local regulation on sustainability**

☐ Security exchange regulations

☐ Non-Financial Reporting Directive of the European Union (NFRD)/Corporate Sustainability Reporting Directive (CSRD)

☒ **Global Reporting Initiative (GRI)**

☒ **Sustainability Accounting Standards Board (SASB, now consolidated into the IFRS Foundation)**

☒ **International Integrated Reporting Council (IIRC, now consolidated into the IFRS Foundation)**

☒ **Climate Disclosure Standards Board (CDSB, now consolidated into the IFRS Foundation)**

☐ Task Force on Climate-related Financial Disclosures (TCFD)

☒ **Carbon Disclosure Project (CDP)**

☐ Science Based Targets initiative (SBTi)

☐ Other voluntary frameworks (Please provide additional information)

☐ No sustainability reporting according to any frameworks nor regulations outside of this Communication on Progress

G12A. (Optional) Please provide additional information:

G13. Is some or all of the information disclosed in this questionnaire assured by a third-party?

(Select one that applies) [i](#)

☐ Yes

☒ **No**

G13A. (Optional) Please provide additional information:

Human Rights and Labour

[Click for additional guidance](#)

NOTE: Regardless of whether the following labour rights and gender topics are marked as material in questions HR/L1 and HR/L1.1, all UN Global Compact participants must provide additional details on these topics in subsequent HR/L questions:

- Freedom of association and the right to collective bargaining
- Child labour
- Forced labour
- Non-discrimination in employment and occupation
- A safe and healthy working environment
- Gender equality and women's rights

For all other human rights topics listed in question HR/L1, additional details will only be required if they are selected as material in question HR/L1.1.

HR/LI. Which of the following has the company identified as material human and labour rights topics connected with its operations and/or value chain?

(Select all that apply) 

- ☒ **Freedom of association and the right to collective bargaining**
- ☒ **Child labour**
- ☒ **Forced labour**
- ☒ **Non-discrimination in respect of employment and occupation**
- ☒ **Safe and healthy working environment**
- ☒ **Wages**
- ☒ **Working hours**
- ☒ **Gender equality and women's rights**
- ☐ Freedom of expression
- ☐ Digital security and privacy
- ☐ Product and service end-user rights
- ☐ Security arrangements
- ☒ **Right to clean and healthy environment: pollution, water, air, and land**
- ☐ Land rights and rights of Indigenous Peoples
- ☐ Rights of vulnerable groups and minorities
- ☒ **Raw material sourcing**
- ☐ Other

HR/LIA. (Optional) Please provide additional information:

HR/L1.1. From the identified topics, please select up to six that are considered most material to the company's operations and/or its value chain.

(Select all that apply, maximum six)

- ☒ **Freedom of association and the right to collective bargaining**
- ☒ **Child labour**
- ☒ **Forced labour**
- ☒ **Non-discrimination in respect of employment and occupation**
- ☒ **Safe and healthy working environment**
- ☐ Wages
- ☐ Working hours
- ☒ **Gender equality and women's rights**
- ☐ Right to clean and healthy environment: pollution, water, air, and land
- ☐ Raw material sourcing

HR/L1.1A. (Optional) Please provide additional information:

HR/L2. Does the company have a policy commitment in relation to the following human rights & labour rights topics?

(Select one answer option per line, if 'Yes', include the value) 

	No, and we have no plans to develop a policy	No, but we plan to within the next two years	Yes, included within a broader policy or as a stand-alone policy	Not applicable (Please provide additional information)
Freedom of association and the right to collective bargaining	☐	☐	☒	☐
Child labour	☐	☐	☒	☐
Forced labour	☐	☐	☒	☐
Non-discrimination in respect of employment and occupation	☐	☐	☒	☐
Safe and healthy working environment	☐	☐	☒	☐
Gender equality and women's rights	☐	☐	☒	☐

Please input the year the relevant human rights and labour rights policy was last reviewed (YYYY)

Freedom of association and the right to collective bargaining

2022

Child labour

2022

Forced labour

2022

Non-discrimination in respect of employment and occupation

2022

Safe and healthy working environment

2022

Gender equality and women's rights

2024

HR/L2A. (Optional) Please provide additional information:

related policies are linked below:

https://www.smartsolar.com.tr/pdf/Diversity_Equity_and_Inclusion_Policy.pdf

<https://www.smartsolar.com.tr/pdf/HUMAN-RIGHTS-POLICY.pdf>

<https://www.smartsolar.com.tr/pdf/HUMAN-RESOURCES-POLICY.pdf>

<https://www.smartsolar.com.tr/pdf/OCCUPATIONAL-HEALTH-AND-SAFETY-POLICY.pdf>

<https://www.smartsolar.com.tr/pdf/Supplier-Code-of-Conduct.pdf>

HR/L2A. (Optional) Please upload supporting documentation if applicable (1/2):

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

HR/L2A. (Optional) Please upload supporting documentation if applicable (2/2):

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

HR/L2.1. For each human rights & labour rights policy commitment, is it:

(Select all that apply for each line) 

	Aligned with international human rights/labour standards	Publicly available	Approved at most senior level of the company	Applied to the company's own operations	Applied to the company's own operations and suppliers
Freedom of association and the right to collective bargaining	☒	☒	☒	☒	☒
Child labour	☒	☒	☒	☒	☒
Forced labour	☒	☒	☒	☒	☒
Non-discrimination in respect of employment and occupation	☒	☒	☒	☒	☒
Safe and healthy working environment	☒	☒	☒	☒	☒
Gender equality and women's rights	☒	☒	☒	☒	☒

	Applied to the company's own operations and the value chain (e.g., suppliers, consumers, communities, other business relationships)	Developed involving human rights/labour expertise from outside the company	Other (Please provide additional information)
· Freedom of association and the right to collective bargaining	☒	☒	☐
· Child labour	☒	☒	☐
· Forced labour	☒	☒	☐
· Non-discrimination in respect of employment and occupation	☒	☒	☐
· Safe and healthy working environment	☒	☒	☐
· Gender equality and women's rights	☒	☒	☐

HR/L2.1A. (Optional) Please provide additional information:

HR/L2.2. Does the company's policy on freedom of association and collective bargaining:

(Select all that apply) i

- ☒ **Reference the respect for the right of all workers to form and join a trade union of their choice without fear of intimidation or reprisal and protect workers against acts of anti-union discrimination**
- ☒ **Prohibit any acts of interference in trade unions**
- ☐ Facilitate collective bargaining with the trade union representatives
- ☐ Provide trade union representatives with the information required for meaningful bargaining in the context of bona fide negotiations
- ☒ **Reference the respect for the right of workers to submit grievances without suffering**
- ☐ We do have a policy on freedom of association or collective bargaining but it does not include any of these details

HR/L2.2A. (Optional) Please provide additional information:

HR/L2.3. Do(es) the existing collective bargaining agreement(s) provide(s) more favourable rights than those provided in legislation, where appropriate?

(Select all that apply) i

- ☒ **Yes, by providing more favourable conditions related to wages**
- ☐ Yes, by providing more favourable conditions related to working hours
- ☒ **Yes, by providing more favourable conditions related to health coverage and/or sick leave**
- ☒ **Yes, by providing additional rights not otherwise provided (Please provide additional information)**
- ☐ There is (are) no existing collective bargaining agreement(s)
- ☐ No

HR/L2.3A. (Optional) Please provide additional information:

HR/L2.3A. Yes, by providing additional rights not otherwise provided (Please provide additional information):

As an additional rights monthly energy benefit provided.

HR/L3. Within the reporting period, has the company engaged with potentially affected stakeholders or their legitimate representatives in relation to the following human rights & labour rights topics?

(Select all that apply for each line) 

	No engagement on this topic	To better understand the risks/impacts in question	To discuss potential ways to prevent or mitigate the risks/impacts in question	To agree on a way to prevent/mitigate the risks/impacts in question	To assess progress in preventing/mitigating the risks/impacts in question
Freedom of association and the right to collective bargaining	☐	☒	☒	☒	☒
Child labour	☐	☒	☒	☒	☒
Forced labour	☐	☒	☒	☒	☒
Non-discrimination in respect of employment and occupation	☐	☒	☒	☒	☒
Safe and healthy working environment	☐	☒	☒	☒	☒
Gender equality and women's rights	☐	☒	☒	☒	☒

To collaborate in the prevention/
mitigation of the risks/ impacts in
question

· Freedom of association and the right to collective bargaining	☒
· Child labour	☒
· Forced labour	☒
· Non-discrimination in respect of employment and occupation	☒
· Safe and healthy working environment	☒
· Gender equality and women's rights	☒

HR/L3A. (Optional) Please provide additional information:

HR/L4. What type of action has the company taken within the reporting period with the aim of preventing/mitigating the risks/impacts associated with the following human rights & labour rights topics?

(Select all that apply for each line) **i**

	No action within reporting period	Provided internal training/ capacity building for the direct workforce	Built capacity among relevant business relationships (e.g., suppliers, consumers, communities)	Conducted an audit process and/or corrective action plan	Collective action with peers or other stakeholders to address the issue
Freedom of association and the right to collective bargaining	☐	☒	☒	☒	☐
Child labour	☐	☒	☒	☒	☐
Forced labour	☐	☒	☒	☒	☐
Non-discrimination in respect of employment and occupation	☐	☒	☒	☒	☐
Safe and healthy working environment	☐	☒	☒	☒	☐
Gender equality and women's rights	☐	☒	☒	☒	☐

	Collaborated with governmental or regulatory bodies	Other (Please provide additional information)
· Freedom of association and the right to collective bargaining	☐	☐
· Child labour	☐	☐
· Forced labour	☐	☐
· Non-discrimination in respect of employment and occupation	☐	☐
· Safe and healthy working environment	☐	☐
· Gender equality and women's rights	☐	☐

HR/L4A. (Optional) Please provide additional information:

HR/L4.1. How does the company assess progress in preventing/mitigating the risks/impacts associated with the following human rights & labour rights topics?

(Select one answer per line) 

	No monitoring of progress	Review topics on an ad hoc basis	Set annual targets/ goals, track progress over time (internal programmes only)	Set annual targets/ goals, track progress over time (internal and external programmes)	Other (Please provide additional information)
Freedom of association and the right to collective bargaining	☐	☐	☐	☒	☐
Child labour	☐	☐	☐	☒	☐
Forced labour	☐	☐	☐	☒	☐
Non-discrimination in respect of employment and occupation	☐	☐	☐	☒	☐
Safe and healthy working environment	☐	☐	☐	☒	☐
Gender equality and women's rights	☐	☐	☐	☒	☐

HR/L4.1A. (Optional) Please provide additional information:

HR/L4.1.1. (Optional) For relevant human rights & labourrights topics for which the company sets timebound goals/targets, what targets has the company set? i

Freedom of association and the right to collective bargaining

Child labour

Forced labour

Non-discrimination in respect of employment and occupation

Safe and healthy working environment

Gender equality and women's rights

HR/L4.1.1A. (Optional) Please provide additional information:

HR/L5. Within the reporting period, has the company been involved in providing or enabling remedy where it has caused or contributed to adverse impact(s) associated with the following human rights & labour topic(s)?

(Select one answer per line) 

	No adverse impact identified or caused	Yes, adverse impact(s) identified, but no remedy provided/enabled	Yes, adverse impact(s) identified, and remedy provided/enabled	Choose not to disclose
Freedom of association and the right to collective bargaining	☒	☐	☐	☐
Child labour	☒	☐	☐	☐
Forced labour	☒	☐	☐	☐
Non-discrimination in respect of employment and occupation	☒	☐	☐	☐
Safe and healthy working environment	☒	☐	☐	☐
Gender equality and women's rights	☒	☐	☐	☐

HR/L5A. (Optional) Please provide additional information:

(Please enter only whole numbers from 0 to 100, inclusive, rounded to the nearest whole number. Do not use decimals, fractions, special characters, spaces, or leading zeros.)



C

Choose to not disclose

0

HR/L7. Within the reporting period, what was the rate of recordable work-related accidents for employees? ⓘ

Guidance for work-related accidents rate: companies should calculate the work-related accidents rate by dividing the total number of work-related accidents in the reporting year by the total number of hours worked by all employees during the same period. The result should then be multiplied by 200,000. Please refer to the CoP guidebook for additional information on the work-related accidents rate formula.

Rate of work-related accidents (Please input a whole number):

○ Unknown

☐ Choose to not disclose

HR/L7A. (Optional) Please provide additional information:

HR/L8. (Optional) Briefly describe additional relevant, practical actions the company has taken within the reporting period and/or plans to take to implement the human rights and labour principles, including goals set and any challenges faced and actions taken towards prevention and/or remediation.[i](#)

Environment

[Click for additional guidance](#)

E1. Does the company have a policy commitment in relation to the following environmental topics?

(Select one answer per line, if 'Yes', include the value) 

	No, and we have no plans to develop a policy	No, but we plan to within the next two years	Yes, included within a broader policy or as a stand-alone policy	Not applicable (Please provide additional information)	Please input the year the relevant environmental policy was last reviewed (
Climate change	☐	☐	☒	☐	2022
Water	☐	☐	☒	☐	2022
Oceans	☐	☐	☐	☒	
Nature and biodiversity	☐	☐	☒	☐	2022
Air pollution	☐	☐	☒	☐	2022
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	☐	☐	☒	☐	2022
Energy & resource use	☐	☐	☒	☐	2022

No, and we have no plans to develop a policy	No, but we plan to within the next two years	Yes, included within a broader policy or as a stand-alone policy	Not applicable (Please provide additional information)	Please input the year the relevant environmental policy was last reviewed (
--	--	--	--	---

Other environmental topic(s)
(Please provide additional information)

☐
☐
☐
☒

EIA. (Optional) Please provide additional information:

please see the related policies linked below:

<https://www.smartsolar.com.tr/pdf/ENVIRONMENTAL-AND-CLIMATE-CHANGE-POLICY.pdf>

https://www.smartsolar.com.tr/pdf/Energy_and_Resource_Efficiency_Policy.pdf

EIA. Not applicable (Please provide additional information):

Our company's operations have no impact on the oceans.

EIA. (Optional) Please upload supporting documentation if applicable (1/2):

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

EIA. (Optional) Please upload supporting documentation if applicable (2/2):

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

E1.1. For each environmental policy commitment, is it:

(Select all that apply for each line) 

	Aligned with international environmental standards	Publicly available	Approved at most senior level of the company	Applied to the company's own operations	Applied to the company's own operations and suppliers
Climate change	☒	☒	☒	☒	☒
Water	☒	☒	☒	☒	☒
Nature and biodiversity	☒	☒	☒	☒	☒
Air pollution	☒	☒	☒	☒	☒
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	☒	☒	☒	☒	☒
Energy & resource use	☒	☒	☒	☒	☒

	Applied to the company's own operations and the value chain (e.g., suppliers, consumers, communities, other business relationships)	Developed involving environmental expertise from inside and outside the company	Other (Please provide additional information)
Climate change	☒	☒	☐
Water	☒	☒	☐
Nature and biodiversity	☒	☒	☐
Air pollution	☒	☒	☐
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	☒	☒	☐
Energy & resource use	☒	☒	☐

E1.1A. (Optional) Please provide additional information:

E2. Within the reporting period, has the company engaged with potentially affected stakeholders or their legitimate representatives in relation to the following environmental topics?

(Select all that apply for each line) **i**

	No engagement on this topic	To better understand the risks/impacts in question	To discuss potential ways to prevent/mitigate the risks/impacts in question	To agree on a way to prevent/mitigate the risks/impacts in question
Climate change	☐	☒	☒	☒
Water	☐	☒	☒	☒
Oceans	☒	☐	☐	☐
Nature and biodiversity	☐	☒	☒	☒
Air pollution	☐	☒	☒	☒
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	☐	☒	☒	☒
Energy & resource use	☐	☒	☒	☒
Other environmental topic(s)	☒	☐	☐	☐

	To assess progress in preventing/mitigating the risks/impacts in question	To collaborate in the prevention/mitigation of the risks/impacts in question	Other (Please provide additional information)
Climate change	☒	☒	☐
Water	☒	☒	☐
Oceans	☐	☐	☐
Nature and biodiversity	☒	☒	☐
Air pollution	☒	☒	☐
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	☒	☒	☐
Energy & resource use	☒	☒	☐
Other environmental topic(s)	☐	☐	☐

E2A. (Optional) Please provide additional information:

E3. What type of action has the company taken within the reporting period with the aim of preventing/mitigating the risks/impacts associated with the following environmental topics?

(Select all that apply) 

	No action within reporting period	Provided internal training/capacity building for the direct workforce	Built capacity among relevant business relationships (e.g. suppliers, consumers, communities)	Conducted an audit process and/or corrective action plan	Collective action with peers or other stakeholders to address the issue
Climate change	☐	☒	☒	☐	☐
Water	☐	☒	☐	☐	☐
Oceans	☒	☐	☐	☐	☐
Nature and biodiversity	☐	☒	☐	☒	☐
Air pollution	☐	☒	☐	☐	☐
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	☐	☒	☐	☐	☐
Energy & resource use	☐	☒	☐	☐	☐
Other environmental topic(s)	☒	☐	☐	☐	☐

	Collaborated with governmental or regulatory bodies	Other (Please provide additional information)
Climate change	☒	☐
Water	☐	☐
Oceans	☐	☐
Nature and biodiversity	☐	☐
Air pollution	☐	☐
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	☒	☐
Energy & resource use	☐	☐
Other environmental topic(s)	☐	☐

E3A. (Optional) Please provide additional information:

E3.1. How does the company assess progress in preventing/mitigating the risks/impacts associated with the following environmental topics?

(Select one answer option per line) 

	No monitoring of progress	Review topics on ad hoc basis	Set annual targets/goals, track progress over time (internal programmes only)	Set annual targets/goals, track progress over time (internal and external programmes)	Other (Please provide additional information)
Climate change	☐	☐	☐	☒	☐
Water	☐	☐	☐	☒	☐
Nature and biodiversity	☐	☒	☐	☐	☐
Air pollution	☐	☐	☐	☒	☐
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	☐	☐	☐	☒	☐
Energy & resource use	☐	☐	☐	☒	☐

E3.1A. (Optional) Please provide additional information:

E3.1.1. (Optional) For relevant environmental topics for which the company sets timebound goals/targets, what targets has the company set?

(Please provide a description of targets (e.g., what is the target, absolute vs. intensity, externally verified, on track, etc.)

Climate change	Our 2040 Net Zero target includes a 30% reduction in Scope 1 emissions and a 50% reduction in Scope 2 emissions by 2030, and a 90% reduction in Scope 1 and 100% in Scope 2 by 2040.
Water	By 2025, water efficiency improvement projects in production will be completed and all new facilities will be designed with water consumption intensity reduction targets.
Air pollution	Full compliance with the requirements of the Environmental Impact Assessment Regulation is targeted. The transition to a low-emission vehicle fleet and travel policy aim to reduce emissions that impact air quality.
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	"Zero Waste" certification will be maintained and strengthened at all facilities. The waste inventory was completed in 2024, and type-based waste management plans were implemented.
Energy & resource use	100% of electricity consumption comes from renewable energy certified sources (I-REC). The 128 MW solar power plant investment in Niğde Bor and the 4 MW solar power plant investment in Kahramanmaraş aim to meet all of the production facilities' electricity needs from renewable sources.

E3.1.1A. (Optional) Please provide additional information:

E3.1.2. For each environmental topic in which the company sets timebound goals/targets, how is progress against goal/target tracked?

(Select all that apply for each line) 

	Progress is not tracked	Progress is reviewed against goals annually or more frequently	Progress is reported internally to the most senior level	Progress is reported externally	Other (Please provide additional information)
Climate change	☐	☒	☒	☒	☐
Water	☐	☒	☒	☒	☐
Air pollution	☐	☒	☒	☒	☐
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	☐	☒	☒	☒	☐
Energy & resource use	☐	☒	☒	☒	☐

E3.1.2A. (Optional) Please provide additional information:

E4. Within the reporting period, has the company been involved in providing or enabling remedy where it has caused or contributed to adverse impact(s) associated with the following environmental topics?

(Select one answer option per line) i

	No adverse impact identified or caused	Yes, adverse impact(s) identified, but no remedy provided/enabled	Yes, adverse impact(s) identified, and remedy provided/enabled	Choose not to disclose
Climate change	☐	☐	☒	☐
Water	☒	☐	☐	☐
Oceans	☒	☐	☐	☐
Nature and biodiversity	☐	☐	☒	☐
Air pollution	☒	☐	☐	☐
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	☒	☐	☐	☐
Energy & resource use	☒	☐	☐	☐
Other environmental topic(s)	☒	☐	☐	☐

E4A. (Optional) Please provide additional information:

E5. Does the company have a target(s), validated by a third-party, relating to the reduction of greenhouse gas (GHG) emissions?

(Text box with option for "No targets set") 

	Known	Baseline year (YYYY)	Target year (YYYY)	No targets set
Scope 1 targets validated by a third-party	☐			☒
Scope 2 targets (market-based) validated by a third-party	☐			☒
Scope 2 targets (location-based) validated by a third-party	☐			☒
Scope 3 targets validated by a third-party	☐			☒
Set targets are not validated by a third-party	☐			☒

E5A. (Optional) Please provide additional information:

E6. Within the reporting period, did the company measure Scope 3 global greenhouse gas (GHG) emissions?

(Select one answer per line, if "Known", include the value. Please enter only whole numbers, rounded to the nearest whole number. Do not use decimals, fractions, special characters, spaces, or leading zeros.) [i](#)

	Known	Measured total emissions (tCO2e)	Yes, partially measured	We did not measure Scope 3 emissions (Please provide additional information)
Scope 3 emissions	☒	58323	☐	☐

E6A. (Optional) Please provide additional information:

E6.1. Which Scope 3 categories are included in the company's Scope 3 emissions calculation?

(Select all that apply) i

- ☒ **Purchased goods and services**
- ☒ **Capital goods**
- ☒ **Fuel- and energy-related activities**
- ☒ **Upstream transportation and distribution**
- ☒ **Waste generated in operations**
- ☒ **Business travel**
- ☒ **Employee commuting**
- ☐ Upstream leased assets
- ☒ **Downstream transportation and distribution**
- ☐ Processing of sold products
- ☐ Use of sold products
- ☒ **End-of-life treatment of sold products**
- ☐ Downstream leased assets
- ☐ Franchises
- ☐ Investments
- ☒ **Other - upstream**
- ☒ **Other - downstream**

E6.1A. (Optional) Please provide additional information:

E7. Does the company have a climate adaptation plan?

(Select all that apply) 

☐ Yes, and it includes physical risk assessments

☒ **Yes, and it includes a physical climate risk scenario analysis**

☐ Yes, and it includes actions to increase adaptation and resilience in the communities in which we operate

☐ No, but we plan to within the next two years

☐ No

E7A. (Optional) Please provide additional information:

E8. Has your company taken steps to reduce its fossil fuel consumption within the reporting period?

(Select one that applies) 

☐ Yes

☒ **No**

E8A. Please provide additional information:

E9. Has the company increased its direct/indirect investment in low-carbon technologies (e.g., renewable energy, nuclear energy, carbon capture and storage (CCS)) during the reporting period?

(Select all that apply) 

☒ **Yes, we have increased direct/indirect investment in renewable energy**

☐ Yes, we have increased direct/indirect investment in nuclear energy

☐ Yes, we have increased direct/indirect investment in carbon capture and storage (CCS)

☐ Yes, we have increased direct/indirect investment in other low-carbon technologies

☐ No change – direct/indirect investment in low-carbon technologies remained the same

☐ No, we have decreased direct/indirect investment in low-carbon technologies

E9A. (Optional) Please provide additional information:

E10. Which of the following has the company identified as material environmental topics connected with its operations and/or value chain (e.g., based on the most severe actual or potential negative impacts on people and/or the environment)?

(Select all that apply) **i**

☒ **Climate change**

☐ Oceans

☒ **Energy & resource use**

☒ **Water**

☐ Nature and biodiversity

☐ Air pollution

☒ **Waste**

☐ None of the topics have been identified as material by the company

E10A. (Optional) Please provide additional information:

E11. Please provide details regarding the company's water withdrawal and consumption (own operations) within the reporting period.

(Select one answer per line, if "Known", include the value. Please enter only whole numbers, rounded to the nearest whole number. Do not use decimals, fractions, special characters, spaces, or leading zeros.) 

	Known	Unknown
Total water withdrawal (Volume of water in megaliters):	☐	☐
Percentage of water withdrawn in regions with high or extremely high water stress (%):	☐	☐
Total water consumption (Volume of water in megaliters):	☒	☐
Percentage of water consumed in regions with high or extremely high water stress (%):	☐	☐

	Not applicable (Please provide additional information)	Number
Total water withdrawal (Volume of water in megaliters):	☒	
Percentage of water withdrawn in regions with high or extremely high water stress (%):	☒	
Total water consumption (Volume of water in megaliters):	☐	81
Percentage of water consumed in regions with high or extremely high water stress (%):	☒	

E11A. (Optional) Please provide additional information:

E11A. Not applicable (Please provide additional information):

E12. Please indicate the water basins of highest priority for engagement based on your direct operations and/or supply chains (up to 10).

If you select 'Not applicable' and move to the next page, you will not report on water basin locations.

☐ Known

☒ **Not Applicable**

E15. Within the reporting period, has the company acted to reduce waste generated by its operations?

(Select all that apply) **i**

- ☐ Yes, through the implementation of circular and/or reuse initiatives
- ☐ Yes, through investment in alternative materials
- ☐ Yes, through recycling measures
- ☒ **No, we are not actively reducing waste**

E15A. (Optional) Please provide additional information:

E16. (Optional) Briefly describe additional relevant, practical actions the company has taken within the reporting period and/or plans to take to implement the environment principles, including any challenges faced and actions taken towards prevention and/or remediation. i

At Smart Solar Technologies, we are committed to a system where resources are used efficiently and waste is transformed into valuable inputs. We embrace the circular economy approach as a core element of our sustainability strategy. In line with this vision, we continue to develop versatile applications that minimize environmental impacts, retain resources longer in the system, and increase operational efficiency. • In this context, we plan to implement Life Cycle Assessment (LCA) processes to assess the environmental impacts of our products with a holistic approach. If our application, submitted on December 12, 2024, under the Izmir Development Agency's "Green Transformation in Industry Technical Support Program," is awarded support in 2025, the first LCA study will be conducted on our solar panels, and the project is expected to be completed within the same year. The data obtained from these studies will aim to provide improvement opportunities, particularly in priority areas such as increasing energy efficiency, reducing carbon emissions, and developing sustainable production processes. These analyses are expected to enable us to assess the environmental impacts of our production processes from raw material procurement to the end of their lifespan. This will yield concrete environmental outcomes related to our production processes, identify areas for improvement using scientific data, and develop resource-efficient production models with lower carbon footprints based on these findings. By 2026, we aim to expand the LCA approach to various product groups and integrate our circular economy approach into all production processes. • Our circular approach is not limited to product design and production processes; it is based on traceability and efficiency in resource use. In this regard, thanks to the integrated production infrastructure currently being established at our Aliağa facility, we plan to transition to a structure that allows us to manage panel, cell, and wafer production processes together. Water efficiency studies, which will encompass all stages of production, aim to make water consumption traceable, measurable, and continuously improveable. • In line with the steps we have taken to prevent waste generation, increase recycling rates, and extend the retention time of resources in the system, our Izmir factory has been awarded the "Zero Waste Certificate" by 2024. At our Gebze facility, which previously received a zero-waste certificate, the process is effectively maintained. These certificates demonstrate our corporate commitment to

the zero-waste goal across all our operations; details of these practices are transparently accessible on our corporate website. • We are also implementing our circular economy approach as an operational system that produces measurable environmental and economic outcomes. The recycling activities we carried out at our Aliğa and Gebze facilities throughout 2024 enabled waste to be transformed into valuable inputs and reintegrated into the system, creating significant impacts on natural resource use, greenhouse gas emissions, and energy consumption.

Anti-Corruption

[Click for additional guidance](#)

AC1. Does the company have an anti-corruption compliance programme?

(Select one that applies) **i**

- ☐ No, this is not a current priority
- ☐ No, but we plan to within the next two years
- ☒ **Yes**

AC1A. (Optional) Please provide additional information:

AC1.1. Is the anti-corruption compliance programme:

(Select all that apply) **i**

- ☒ **Publicly available**
- ☒ **Approved at most senior level of the company**
- ☒ **Applied to the company's own operations**
- ☒ **Applied to the company's own operations and suppliers**
- ☒ **Applied to the company's own operations and the value chain**
- ☒ **(e.g., suppliers, consumers, communities, other business relationships)**
- ☐ Other (Please provide additional information)

AC1.1A. (Optional) Please provide additional information:

for the further details please see the link below:

<https://www.smartsolar.com.tr/pdf/ANTI-BRIBERY-AND-CORRUPTION-POLICY.pdf>

AC1.2. Does the company monitor its anti-corruption compliance programme?

(Select all that apply) 

- ☒ **Yes, through review on an adhoc basis**
- ☒ **Yes, through internal employee self-evaluations**
- ☐ Yes, through automated controls monitoring
- ☐ Yes, through external independent monitoring
- ☐ Yes, through other mechanisms (Please provide additional information)
- ☐ No, we do not monitor the anti-corruption compliance programme
(Please provide additional information)

AC1.2A. (Optional) Please provide additional information:

AC2. Does the company have policies and recommendations for employee procedures in case of doubt and/or in situations that may represent a conflict of interest, e.g. with regard to gifts and hospitality, donations, sponsorship, or interactions with public officials?

(Select one that applies) 

- ☐ No, and we have no plans to develop any policy/recommendation
- ☐ No, but we plan to within the next two years
- ☒ **Yes, included within a broader policy or as a standalone policy**

AC2A. (Optional) Please provide additional information:

AC3. Does the company engage in collective action against corruption?

(Select one that applies) [i](#)

- ☒ **No, this is not a current priority**
- ☐ No, but we plan to in the next two years
- ☐ Yes (Please provide additional information)

AC3A. (Optional) Please provide additional information:

AC4. Who receives training on anti-corruption and integrity?

(Select all that apply) [i](#)

- ☒ **Selected employees (Please provide additional information)**
- ☐ All employees
- ☐ Third-party suppliers, contractors and/or consultants
- ☐ No training provided

AC4A. (Optional) Please provide additional information:

AC4A. Selected employees (Please provide additional information):

Awareness was significantly strengthened by ensuring that 12 employees from the sustainability, purchasing and human resources departments participated in the 32-hour social compliance lead auditor training program for each employee.

AC4.1. How often is such training provided?

(Select one answer option per line)**i**

	One time only	Every two or more years	Every year	Unknown
Selected employees	☐	☒	☐	☐

AC4.1A. (Optional) Please provide additional information:

AC5. Within the reporting period, have there been any suspected incidents of corruption?

(Select one that applies) [i](#)

☐ Yes

☒ **No**

AC5A. (Optional) Please provide additional information:

AC6. (Optional) Briefly describe additional relevant practical actions the company has taken within the reporting period and/or plans to take to implement the anti-corruption principle, including any challenges faced and actions taken towards prevention and/or remediation. [i](#)

R5. (Optional) Please upload the sustainability report for your company

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

R5.1. (Optional) Please upload another document if applicable

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

R5.2. (Optional) Please upload another document if applicable

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