

2023 SUSTAINABILITY REPORT

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The Sustainability Report has been prepared by the Project Team under the leadership of Prof. Dr. Eralp Ozil for LCM ROTA DENİZCİLİK **All rights reserved. No part of this work may be reproduced or used in any form or by any means – graphic, electronic, or mechanical, including photocopying, recording, taping or information storage and retrieval systems – without the written permission of the author and or the LCM ROTA DENİZCİLİK**, except in accordance with the provisions of the Turkish Intellectual Properties ACT (latest version of Law No. 5846), World Intellectual Property Organization, US Copyright Office and UK Copyright Designs and Patents Act of 1988.



1 Introduction

LCM ROTA DENİZCİLİK's founder, Kemal Akgün, started his career in 1986 in aggregate facility management and later, from 1991 onwards, undertook numerous deep-sea discharge and infrastructure projects. Recognizing the demand for marine construction, he established LCM ROTA DENİZCİLİK as a sole proprietorship in 2006, specializing in seabed surveys and coastal structures. The company was incorporated as a limited company in 2011.

Over time, LCM ROTA DENİZCİLİK has expanded its equipment capacity and completed many significant projects in Turkey and abroad. It is known as one of Turkey's leading marine dredging companies, achieving a daily dredging capacity of 18,000 cubic meters and an annual capacity of 2 million cubic meters with six mud vessels, three dredging vessels, and one bucket dredger.

With nearly 40 years in infrastructure and almost 20 years of marine dredging and coastal structures, LCM ROTA DENİZCİLİK provides services such as seabed dredging, underwater pipe laying, pier and breakwater constructions, and underwater concrete works.

In recent years, it has taken part in Turkey's leading projects with a dredging volume exceeding million cubic meters and has successfully completed and delivered many projects to date. Turkmenistan Türkmenbaşı Port Inshore Piling (2018), İGA 3rd Airport Fuel Supply Port Sea Bottom Dredging (2019), İçtaş Karasu Port Sea Bottom Dredging (2019), Filyos (Zonguldak) Port Sea Bottom Dredging (2020), İzmit Yarımca Oyakport Port Seabed Dredging (2021) and Mersin Ministry of National Defense Port Seabed Dredging and Pier Structures (2022), Sefine Shipyard Seabed Dredging (2023) are some of the projects completed by LCM ROTA DENİZCİLİK.

Headquartered in Tuzla, Istanbul, LCM ROTA DENİZCİLİK operates a facility in Tuzla Tepeören for repair, maintenance, and logistics support.



Additionally, it is currently engaged in a villa construction project in Tepeören, Tuzla, initiated in September 2022.

LCM ROTA DENİZCİLİK has ensured its existence in Turkey and some neighbouring countries for nearly forty years by basing its understanding of sustainability on solid foundations as a principle and is determined to continue to do so. LCM ROTA DENİZCİLİK shapes its sustainability vision with the commitment to leave a more liveable world to future generations. In other words, it shapes and carries the responsibility of tomorrow with the strength we draw from forty years of history.

This report comprehensively details our sustainability principles, goals, and the steps we are taking to align with them. Addressing global environmental challenges and combating climate change are among the foremost responsibilities of responsible production and service practices today, forming the cornerstone of our enduring and quality-driven business philosophy.



The report aims to share with stakeholders and the community our efforts to reduce carbon footprint, efficiently utilize natural resources, implement UN sustainability goals in production and service processes, minimize environmental impact through biodiversity conservation, and contribute economically, socially, and culturally. Transparency and accountability principles are central to building and reinforcing stakeholder trust.

LCM ROTA DENİZCİLİK's aim is not only to present a sustainability report, but also to reinforce the trust of our stakeholders by being transparent and accountable.

This report formalizes LCM ROTA DENİZCİLİK's sustainability journey and commitments. Senior management and all employees believe that every step taken towards building a better world for future generations is crucial.

VISION

Our vision is to be a respected and robust Turkish company that believes in the necessity of establishing and diligently working towards a creative governance system, especially in coastal structures and marine construction, where environmental, social, and corporate governance (ESG) are increasingly crucial for restoring ecological systems, social balance, and welfare in Turkey and globally. We commit to implementing the principles of sustainability in their entirety.

MISSION

Our mission is to reliably guide LCM ROTA DENİZCİLİK into the future, surpassing expectations with sustainable and energy-efficient new approaches, guided by universal values and principles established under the leadership of the UN. In this context, our mission is to strive for leadership in the sectors where we operate, both domestically and within the EU and third countries, and to establish our company as a magnet for talented professionals.

LCM ROTA DENİZCİLİK'S ADOPTION OF THE UN SUSTAINABLE DEVELOPMENT GOALS AND SUPPORT FOR THE UN GLOBAL COMPACT

LCM ROTA DENİZCİLİK supports the UN 2030 Sustainable Development Agenda through its activities and is committed to contributing to sustainable development through its daily operations. Figure 1-1, illustrates the 17 Sustainable Development Goals (SDGs) set by the United Nations to transform the world. Table 1.1 gives a brief description of all Goals.

Table 1.1 Brief Description of the UN's 17 Sustainable Development Goals

Goal 1. End poverty in all its forms everywhere
Goal 2. End hunger, achieve food security and improved nutrition, and promote sustainable agriculture
Goal 3. Ensure healthy lives and promote wellbeing for all at all ages
Goal 4. Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all
Goal 5. Achieve gender equality and empower all women and girls
Goal 6. Ensure availability and sustainable management of water and sanitation for all
Goal 7. Ensure access to affordable, reliable, sustainable, and modern energy for all
Goal 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment, and decent work for all
Goal 9. Build resilient infrastructure, promote inclusive and sustainable industrialisation, and foster innovation
Goal 10. Reduce inequality within and among countries
Goal 11. Make cities and human settlements inclusive, safe, resilient, and sustainable
Goal 12. Ensure sustainable consumption and production patterns



Figure 1.1 The Seventeen Sustainable Development Goals of the United Nations

Goal 13. Take urgent action to combat climate change and its impacts

Goal 14. Conserve and sustainably use the oceans, seas, and marine resources for sustainable development

Goal 15. Protect, restore, and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, halt and reverse land degradation, and halt biodiversity loss

Goal 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all, and build effective, accountable, and inclusive institutions at all levels

Goal 17. Strengthen the means of implementation and revitalise the global partnership for sustainable development

These goals directly impact LCM ROTA DENİZCİLİK's daily and annual operations. Some goals have an indirect effect on daily operations. LCM ROTA DENİZCİLİK acknowledges and accepts that it is deficient in one goal as of 2023 and commits to making corrections as soon as possible.

Below is the distribution of these seventeen goals among the three groups mentioned above:

Goals to which LCM ROTA DENİZCİLİK Directly Contributes:

Goal 1. End poverty in all its forms everywhere

Goal 2. End hunger, achieve food security and improved nutrition, and promote sustainable agriculture

Goal 5: Achieve gender equality and empower all women and girls

Goal 8: Promote sustained, inclusive and sustainable economic growth, full and productive employment, and decent work for all

Goal 9: Build resilient infrastructure, promote inclusive and sustainable industrialisation, and foster innovation

Goal 14: Conserve and sustainably use the oceans, seas, and marine resources for sustainable development

Goal 15. Protect, restore, and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, halt and reverse land degradation, and halt biodiversity loss



Targets to which LCM ROTA DENİZCİLİK Indirectly Contributed:

Goal 3. Ensure healthy lives and promote wellbeing for all at all ages
Goal 4. Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all
Goal 6. Ensure availability and sustainable management of water and sanitation for all
Goal 7. Ensure access to affordable, reliable, sustainable, and modern energy for all
Goal 10. Reduce inequality within and among countries
Goal 11. Make cities and human settlements inclusive, safe, resilient, and sustainable
Goal 12. Ensure sustainable consumption and production patterns
Goal 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all, and build effective, accountable, and inclusive institutions at all levels
Goal 17: Strengthen the means of implementation and revitalise the global partnership for sustainable development

Target to which LCM ROTA DENİZCİLİK could not contribute sufficiently:

Goal 5: Achieve gender equality and empower all women and girls
--

In 2023, LCM ROTA DENİZCİLİK employs a maximum of 101 staff members, with six female employees, constituting 6% of the total workforce. Similar deficiencies are also present among the Board of Directors. Starting in 2024, efforts will gradually begin to eliminate this inequality, indicating a shortfall in gender equality.

LCM ROTA DENİZCİLİK has prioritized UN Sustainable Development Goals 5 (Gender Equality), 8 (Decent Work and Economic Growth), 12 (Responsible Consumption and Production), and 14 (Life Below Water) as critical objectives. The company believes it has sufficient resources allocated to achieve these goals.

CONTRIBUTION OF LCM ROTA DENİZCİLİK TO THE UN SUSTAINABLE DEVELOPMENT GOALS AND SUPPORT FOR THE UN GLOBAL COMPACT PRINCIPLES

Since adopting the UN Global Principles, LCM ROTA DENİZCİLİK has been contributing to the UN 2030 Sustainable Development Agenda through its activities, operations, and management approach, and supports the UN Global Compact. The 2030 Sustainable Development Agenda was launched at the UN Summit held in New York from September 25-27, 2015, and fundamentally aims to end poverty in all its forms. The agenda envisions a world where universal respect for human rights and human dignity, the rule of law, justice, equality, and non-discrimination is upheld. LCM ROTA DENİZCİLİK fully supports the concept of ending poverty in all its forms and is ready to contribute in every possible way within its means.



The UN Global Compact should be regarded as a call to companies to align their strategies and operations with universal principles on human rights, labor, environment, and anti-corruption, and to take actions that advance societal goals and the full implementation of sustainable development goals. According to the UN, corporate sustainability means that a company has a value system and is based on a principles-driven approach to doing business. This means operating in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labor, environment, and anti-corruption. Responsible businesses enact the same values and principles wherever they have a presence, knowing that good practices in one area do not offset harm in another. By incorporating the “Ten Principles” of the UN Global Compact into their strategies, policies, and procedures, and establishing a culture of integrity, companies not only uphold their basic responsibilities to people and the planet but also set the stage for long-term success. These ten principles are given in Table 1.2.

Table 1.2 Ten Principles of the UN Global Compact

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights;
Principle 2: Businesses should make sure that they are not complicit in human rights abuses.
Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
Principle 4: The elimination of all forms of forced and compulsory labour;
Principle 5: The effective abolition of child labour.
Principle 6: The elimination of discrimination in respect of employment and occupation.
Principle 7: Businesses should support a precautionary approach to environmental challenges;
Principle 8: Undertake initiatives to promote greater environmental responsibility;
Principle 9: Encourage the development and diffusion of environmentally friendly technologies.
Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

Below are some examples of how LCM ROTA DENİZCİLİK aligns with the UN goals and the UN Global Compact Principles:

1. Fair Employment Practices: LCM ROTA DENİZCİLİK places great importance on hiring employees and assigning roles within the municipality based on relevant skills. Depending on their qualifications, most LCM ROTA DENİZCİLİK employees receive salaries above the country's minimum wage, significantly reducing the risk of human rights violations.
2. Legal Compliance and Ethics: LCM ROTA DENİZCİLİK is always a lawful, reliable, and fair institution. It recognizes and fully complies with the UN Guiding Principles on Business and Human Rights. All new employees are trained on the Code of Ethical Conduct as part of their introduction to LCM ROTA DENİZCİLİK activities and training. Additionally, all senior managers do everything possible to minimize risks in this area. Starting in 2025, a systematic plan for auditing suppliers will be implemented.



GRI CONTENT INDEX

Statement of use	LCM ROTA DENİZCİLİK has reported in accordance with the GRI Standards for the period 01.01.2023 and 31.12.2023
GRI 1 used	GRI 1: Foundation 2021
Applicable GRI Sector Standard(s)	-

GRI STANDARD / OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION		
			OMITTED	REASON	EXPLANATION
General disclosures					
GRI 2: General Disclosures 2021	2-1 Organizational details	11			
	2-2 Entities included in the organization's sustainability reporting	11			
	2-3 Reporting period, frequency and contact point	11			
	2-4 Restatements of information	11			
	2-5 External assurance	11			
	2-6 Activities, value chain and other business relationships	12			
	2-7 Employees	13			
	2-8 Workers who are not employees	13			

GRI STANDARD / OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION		
			OMITTED	REASON	EXPLANATION
GRI 2: General Disclosures 2021	2-9 Governance structure and composition	14			
	2-10 Nomination and selection of the highest governance body	15			
	2-11 Chair of the highest governance body	15			
	2-12 Role of the highest governance body in overseeing the management of impacts	15			
	2-13 Delegation of responsibility for managing impacts	15			
	2-14 Role of the highest governance body in sustainability reporting	15			
	2-15 Conflicts of interest	15			
	2-16 Communication of critical concerns	16			
	2-17 Collective knowledge of the highest governance body	16			

GRI STANDARD / OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION		
			OMITTED	REASON	EXPLANATION
GRI 2: General Disclosures 2021	2-18 Evaluation of the performance of the highest governance body	16			
	2-19 Remuneration policies	16			
	2-20 Process to determine remuneration	16			
	2-21 Annual total compensation ratio	17			
	2-22 Statement on sustainable development strategy	18			
	2-23 Policy commitments	19			
	2-24 Embedding policy commitments	19			
	2-25 Processes to remediate negative impacts	19			
	2-26 Mechanisms for seeking advice and raising concerns	20			
	2-27 Compliance with laws and regulations	20			
	2-28 Membership associations	20			
	2-29 Approach to stakeholder engagement	21			
2-30 Collective bargaining agreements	23				

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION		
			OMITTED	REASON	EXPLANATION
Material topics					
GRI 3: Material Topics 2021	3-1 Process to determine material topics	24			
	3-2 List of material topics	25			
Economic performance					
GRI 3: Material Topics 2021	3-3 Management of material topics	28			
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	28			
	201-2 Financial implications and other risks and opportunities due to climate change	-	X	Information unavailable / incomplete	This is the first year of the sustainability report and there is insufficient information for a study on climate change related risks and financial dimensions.
	201-3 Defined benefit plan obligations and other retirement plans	29			
	201-4 Financial assistance received from government	29			

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION		
			OMITTED	REASON	EXPLANATION
Market presence					
GRI 3: Material Topics 2021	3-3 Management of material topics	29	X	Not applicable	LCM ROTA DENİZCİLİK does not produce or market any products
GRI 202: Market Presence 2016	202-1 Ratios of standard entry level wage by gender compared to local minimum wage	29			
	202-2 Proportion of senior management hired from the local community	29			
Indirect economic impacts					
GRI 3: Material Topics 2021	3-3 Management of material topics	29			
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	30			
	203-2 Significant indirect economic impacts	30			
Procurement practices					
GRI 3: Material Topics 2021	3-3 Management of material topics	30			
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	30			

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION		
			OMITTED	REASON	EXPLANATION
Anti-corruption					
GRI 3: Material Topics 2021	3-3 Management of material topics	31			
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	31			
	205-2 Communication and training about anti-corruption policies and procedures	31			
	205-3 Confirmed incidents of corruption and actions taken	31			
Anti-competitive behavior					
GRI 3: Material Topics 2021	3-3 Management of material topics	31			
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	32			
Tax					
GRI 3: Material Topics 2021	3-3 Management of material topics	32			

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION		
			OMITTED	REASON	EXPLANATION
GRI 207: Tax 2019	207-1 Approach to tax	32			
	207-2 Tax governance, control, and risk management	32			
	207-3 Stakeholder engagement and management of concerns related to tax	32			
	207-4 Country-by-country reporting	-	X	Not applicable	LCM ROTA DENİZCİLİK did not make any tax payments arising from its own activities in 2023 and has no activities in another country.
Materials					
GRI 3: Material Topics 2021	3-3 Management of material topics	34			
GRI 301: Materials 2016	301-1 Materials used by weight or volume	34			
	301-2 Recycled input materials used	35			
	301-3 Reclaimed products and their packaging materials	35			

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION		
			OMITTED	REASON	EXPLANATION
Energy					
GRI 3: Material Topics 2021	3-3 Management of material topics	35			
GRI 302: Energy 2016	302-1 Energy consumption within the organization	35			
	302-2 Energy consumption outside of the organization	37			
	302-3 Energy intensity	37			
	302-4 Reduction of energy consumption	-	X	Not applicable	Since this sustainability report is the first sustainability report of LCM ROTA DENİZCİLİK, it has not been evaluated.
	302-5 Reductions in energy requirements of products and services	-	X	Not applicable	Since this sustainability report is the first sustainability report of LCM ROTA DENİZCİLİK, it has not been evaluated.
Water and effluents					
GRI 3: Material Topics 2021	3-3 Management of material topics	37			
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	38			
	303-2 Management of water discharge-related impacts	38			
	303-3 Water withdrawal	38			
	303-4 Water discharge	38			
	303-5 Water consumption	38			

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION		
			OMITTED	REASON	EXPLANATION
Biodiversity					
GRI 3: Material Topics 2021	3-3 Management of material topics	39			
GRI 304: Biodiversity 2016	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	39			
	304-2 Significant impacts of activities, products and services on biodiversity	39			
	304-3 Habitats protected or restored	-	X	Not applicable	Since the biodiversity protocol came into effect in 2023, no biodiversity-related inspections could be carried out in new constructions.
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	-	X	Not applicable	Since the biodiversity protocol came into effect in 2023, no biodiversity-related inspections could be carried out in new constructions.
Emissions					
GRI 3: Material Topics 2021	3-3 Management of material topics	39			

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION		
			OMITTED	REASON	EXPLANATION
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	40			
	305-2 Energy indirect (Scope 2) GHG emissions	40			
	305-3 Other indirect (Scope 3) GHG emissions	40			
	305-4 GHG emissions intensity	41			
	305-5 Reduction of GHG emissions	41			
	305-6 Emissions of ozone-depleting substances (ODS)	-	X	Information unavailable / incomplete	Information on air conditioning gases and refrigerators is not available.
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	-	X	Information unavailable / incomplete	Emission details not available.
Waste					
GRI 3: Material Topics 2021	3-3 Management of material topics	41			
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	41			
	306-2 Management of significant waste-related impacts	41			
	306-3 Waste generated	42			
	306-4 Waste diverted from disposal	42			
	306-5 Waste directed to disposal	-	X	Information unavailable / incomplete	Adequate records were not kept regarding waste. It will begin to be held in the coming years.

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION		
			OMITTED	REASON	EXPLANATION
Supplier environmental assessment					
GRI 3: Material Topics 2021	3-3 Management of material topics	42			
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	42			
	308-2 Negative environmental impacts in the supply chain and actions taken	42			
Employment					
GRI 3: Material Topics 2021	3-3 Management of material topics	44			
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	44			
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	44			
	401-3 Parental leave	45			

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION		
			OMITTED	REASON	EXPLANATION
Labor/management relations					
GRI 3: Material Topics 2021	3-3 Management of material topics	45			
GRI 402: Labor/ Management Relations 2016	402-1 Minimum notice periods regarding operational changes	45			
Occupational health and safety					
GRI 3: Material Topics 2021	3-3 Management of material topics	45			
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	45			
	403-2 Hazard identification, risk assessment, and incident investigation	46			
	403-3 Occupational health services	46			
	403-4 Worker participation, consultation, and communication on occupational health and safety	46			
	403-5 Worker training on occupational health and safety	47			
	403-6 Promotion of worker health	47			

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION		
			OMITTED	REASON	EXPLANATION
GRI 403: Occupational Health and Safety 2018	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	47			
	403-8 Workers covered by an occupational health and safety management system	47			
	403-9 Work-related injuries	47			
	403-10 Work-related ill health	48			
Training and education					
GRI 3: Material Topics 2021	3-3 Management of material topics	48			
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	48			
	404-2 Programs for upgrading employee skills and transition assistance programs	49			
	404-3 Percentage of employees receiving regular performance and career development reviews	49			
Diversity and equal opportunity					
GRI 3: Material Topics 2021	3-3 Management of material topics	49			

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION		
			OMITTED	REASON	EXPLANATION
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	49			
	405-2 Ratio of basic salary and remuneration of women to men	50			
Non-discrimination					
GRI 3: Material Topics 2021	3-3 Management of material topics	50			
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	50			
Freedom of association and collective bargaining					
GRI 3: Material Topics 2021	3-3 Management of material topics	50			
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	50			
Child labor					
GRI 3: Material Topics 2021	3-3 Management of material topics	50			
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	50			

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION		
			OMITTED	REASON	EXPLANATION
Forced or compulsory labor					
GRI 3: Material Topics 2021	3-3 Management of material topics	50			
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	50			
Security practices					
GRI 3: Material Topics 2021	3-3 Management of material topics	51			
GRI 410: Security Practices 2016	410-1 Security personnel trained in human rights policies or procedures	51			
Rights of indigenous peoples					
GRI 3: Material Topics 2021	3-3 Management of material topics	-	X	Not applicable	LCM ROTA DENİZCİLİK does not operate in any country or region where the rights of indigenous peoples are in danger.
GRI 411: Rights of Indigenous Peoples 2016	411-1 Incidents of violations involving rights of indigenous peoples	-	X	Not applicable	
Local communities					
GRI 3: Material Topics 2021	3-3 Management of material topics	-	X	Not applicable	LCM ROTA DENİZCİLİK's activities do not have any direct impact on local communities.
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	-	X	Not applicable	LCM ROTA DENİZCİLİK's activities do not have any direct impact on local communities.
	413-2 Operations with significant actual and potential negative impacts on local communities	-	X	Not applicable	LCM ROTA DENİZCİLİK's activities do not have any direct impact on local communities.

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION		
			OMITTED	REASON	EXPLANATION
Supplier social assessment					
GRI 3: Material Topics 2021	3-3 Management of material topics	51			
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	51			
	414-2 Negative social impacts in the supply chain and actions taken	51			
Public policy					
GRI 3: Material Topics 2021	3-3 Management of material topics	51			
GRI 415: Public Policy 2016	415-1 Political contributions	51			
Customer health and safety					
GRI 3: Material Topics 2021	3-3 Management of material topics	-	X	Not applicable	LCM ROTA DENİZCİLİK's activities do not have individual customers.
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories	-	X	Not applicable	LCM ROTA DENİZCİLİK's activities do not have individual customers.
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	-	X	Not applicable	LCM ROTA DENİZCİLİK's activities do not have individual customers.

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION		
			OMITTED	REASON	EXPLANATION
Marketing and labeling					
GRI 3: Material Topics 2021	3-3 Management of material topics	-	X	Not applicable	LCM ROTA DENİZCİLİK does not have any products to label among its activities and the company does not have individual customers.
GRI 417: Marketing and Labeling 2016	417-1 Requirements for product and service information and labeling	-	X	Not applicable	LCM ROTA DENİZCİLİK does not have any products to label among its activities and the company does not have individual customers.
	417-2 Incidents of non-compliance concerning product and service information and labeling	-	X	Not applicable	LCM ROTA DENİZCİLİK does not have any products to label among its activities and the company does not have individual customers.
	417-3 Incidents of non-compliance concerning marketing communications	-	X	Not applicable	Among the activities of LCM ROTA DENİZCİLİK, the company does not have individual customers.
Customer privacy					
GRI 3: Material Topics 2021	3-3 Management of material topics	51			
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	51			

